

Attention:  
Mr. C. Delpont  
BECS Services (Pty) Ltd  
358 Serene Street  
Garsfontein  
0081

17/08/2022

## **RECOMMENDED EXEMPTION FROM ARCHAEOLOGICAL IMPACT ASSESSMENT**

### **STUDY: QUARRY 3 AT THE ANNESLEY ANDALUSITE MINE TO THE NORTH OF BURGERSFORT, LIMPOPO**

BECS Environmental (Pty) Ltd have been appointed by the applicant, Annesley Andalusite Mine, to undertake an environmental assessment as part of the Scoping and Environmental Impact Assessment application process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations. As well as the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA) (As amended).

Imerys Refractory Minerals South Africa (Pty) Ltd proposes to rehabilitate Quarry 3 at the Annesley Andalusite Mine that is located on the Remaining Extents of the Farms Annesley 109 KT and Holfontein 126 KT within the Limpopo Province. The quarry is located approximately 30 km north-northwest of Burgersfort and 38 km north of Steelpoort (**Figures 1 & 2; Table 1**). The project area measures approximately 4.53 ha and the proposed rehabilitation, that will consist of the eventual filling of the quarry, will be confined to the already disturbed extent of Quarry 3 only.

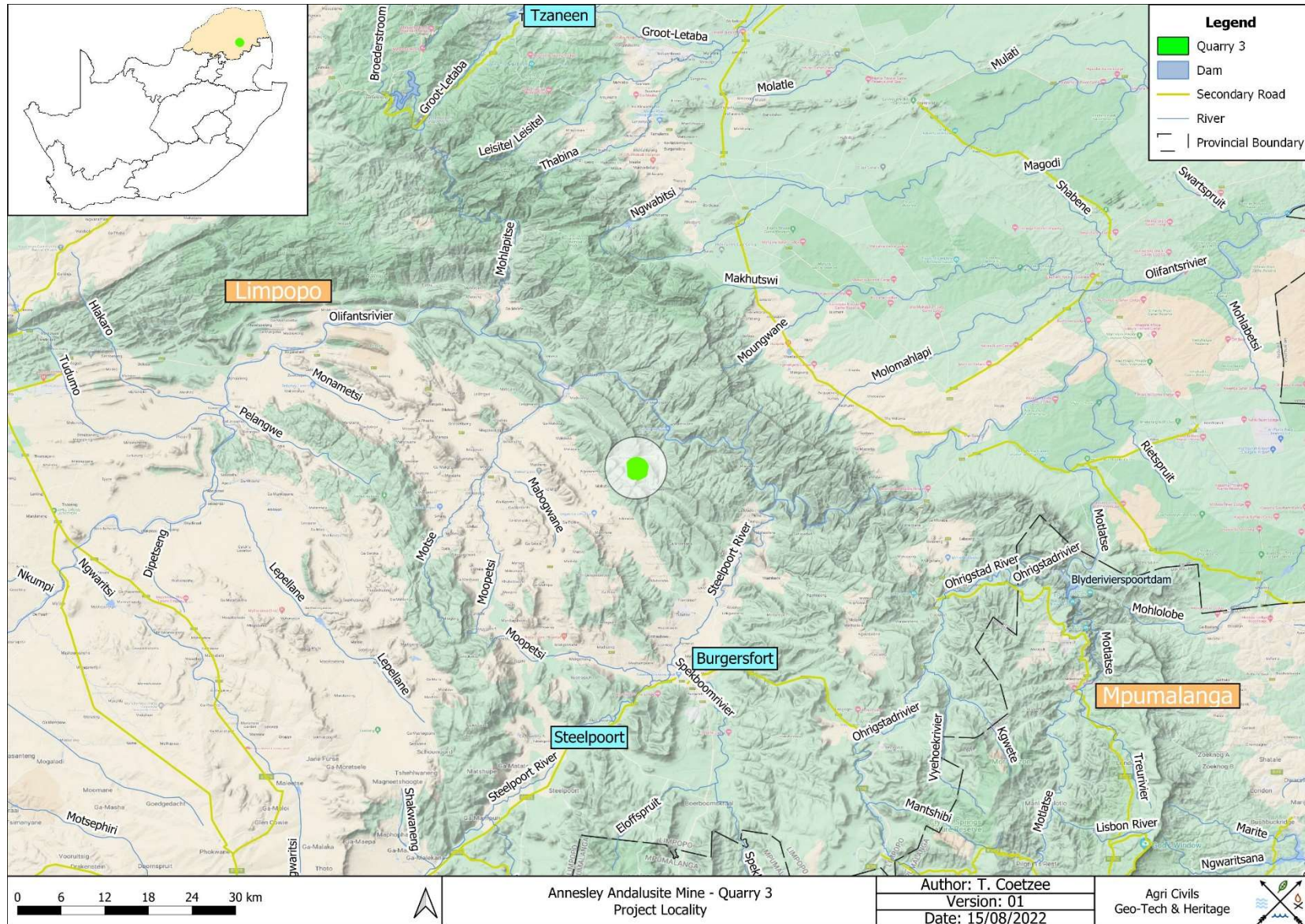


Figure 1: Regional location of the study area.

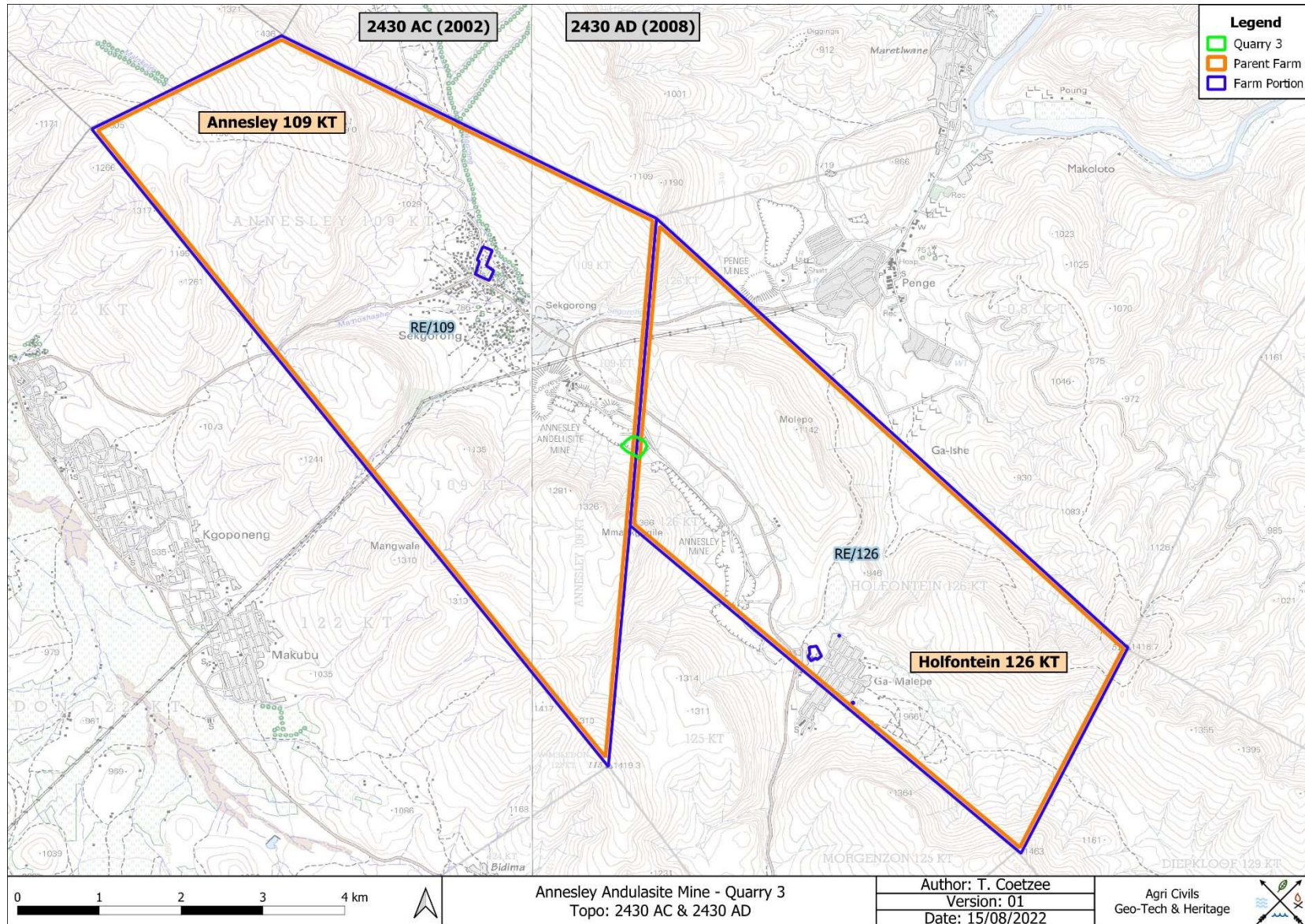


Figure 2: Segments of SA 1: 50 000 2430 AC & AD indicating the study area.

**Table 1: Location & Extent**

Farm Portion	Parent Farm	Lat	Lon	Project Extent
Remaining Extent	Annesley 109 KT	S: -24.403099	E: 30.260907	4.53 ha
Remaining Extent	Holfontein 126 KT	S: -24.403132	E: 30.262129	

The Appendix A maps (**Appendix A: Figures 3 – 13**) indicate the Quarry 3 area on 1938, 1954, 1970, 1986 and 2002 aerial images, as well as on 1964, 1975, 1997, 2002 and 2008 topographical maps, while the 2021 satellite image shows the most recent state of the quarry.

The 1938, 1954 and 1970 aerial images, as well as the 1964 and 1975 topographical maps show that the Quarry 3 area used to be associated with dense tree cover and that no development occurred within the boundary (**Appendix A: Figures 3 – 7**). Homesteads and small cultivated fields, however, are visible to the east of the Quarry 3 area when the 1954 and 1970 aerial images are inspected (**Appendix A: Figures 4 & 6**). The same detail is also noted on the 1975 topographical map (**Appendix A: Figure 7**). The first mining activity in the vicinity of the quarry occurred to the northwest and is visible on the 1970 aerial image and on the 1975 topographical map (**Appendix A: Figures 6 & 7**). By 1986 mining development in the area had expanded significantly, but the Quarry 3 area remained untouched (**Appendix A: Figure 8**). Based on the 1997 topographical map, and the 2002 aerial image and topographical map, the mining of Quarry 3 occurred between 1997 and 2002 (**Appendix A: Figures 9 – 11**).

Historical aerial images, topographical maps and contemporary satellite imagery prove that the entire Quarry 3 area was completely disturbed by mining development and is not considered to be sensitive from a heritage perspective (**Appendix A: Figures 12 & 13**). It should also be noted that no potential heritage sites falling within the Quarry 3 boundary were noted on any of the historical aerial images and maps prior to the commencement of mining activities. Therefore, it is recommended that the area associated with Quarry 3 as per the indicated boundary be exempted from further Phases of archaeological impact assessments, subject to minimum standards: Archaeological and Palaeontological Components of Impact Assessments as set out by the South African Heritage Resources Agency (SAHRA) which states that:

*When a property is either very disturbed (e.g. has been quarried or mined) or is very small and the archaeologist can see that it is highly unlikely that any archaeological remains will be found, a 'Letter of Recommendation for Exemption' from a full Phase 1 report may be supplied.*

The following recommendation is made in order to avoid/limit the destruction of heritage remains regarding the concerned project:

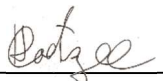
- Should culturally significant material may be discovered by chance, all activities must be suspended pending further archaeological investigations by a qualified archaeologist. Also, should skeletal remains be exposed, all activities must be suspended and the relevant heritage resources authority must be contacted (See National Heritage Resources Act, 25 of 1999 section 36 (6)).

### General Legislation

The National Heritage Resources Act (Act No. 25 of 1999, section 38) provides guidelines for Cultural Resources Management and prospective developments:

*“38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as:*

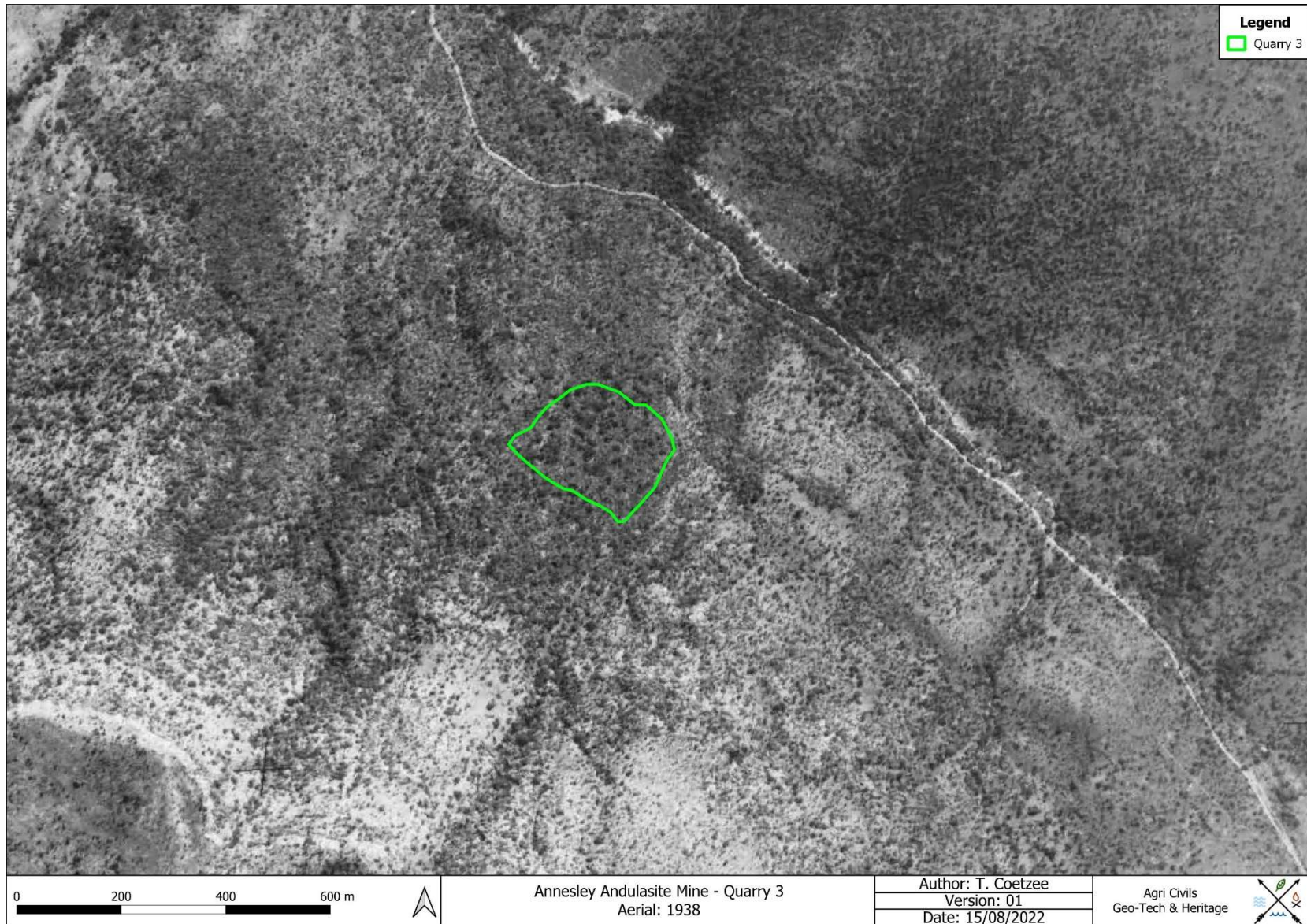
- (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*
- (b) the construction of a bridge or similar structure exceeding 50m in length;*
- (c) any development or other activity which will change the character of a site-*
  - i. exceeding 5000m<sup>2</sup> in extent; or*
  - ii. involving three or more existing erven or subdivisions thereof; or*
  - iii. involving three or more erven or divisions thereof which have been consolidated within the past five years; or*
  - iv. the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;*
- (d) the re-zoning of a site exceeding 10000m<sup>2</sup> in extent; or*
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.” (38. [1] 1999:62-64)*



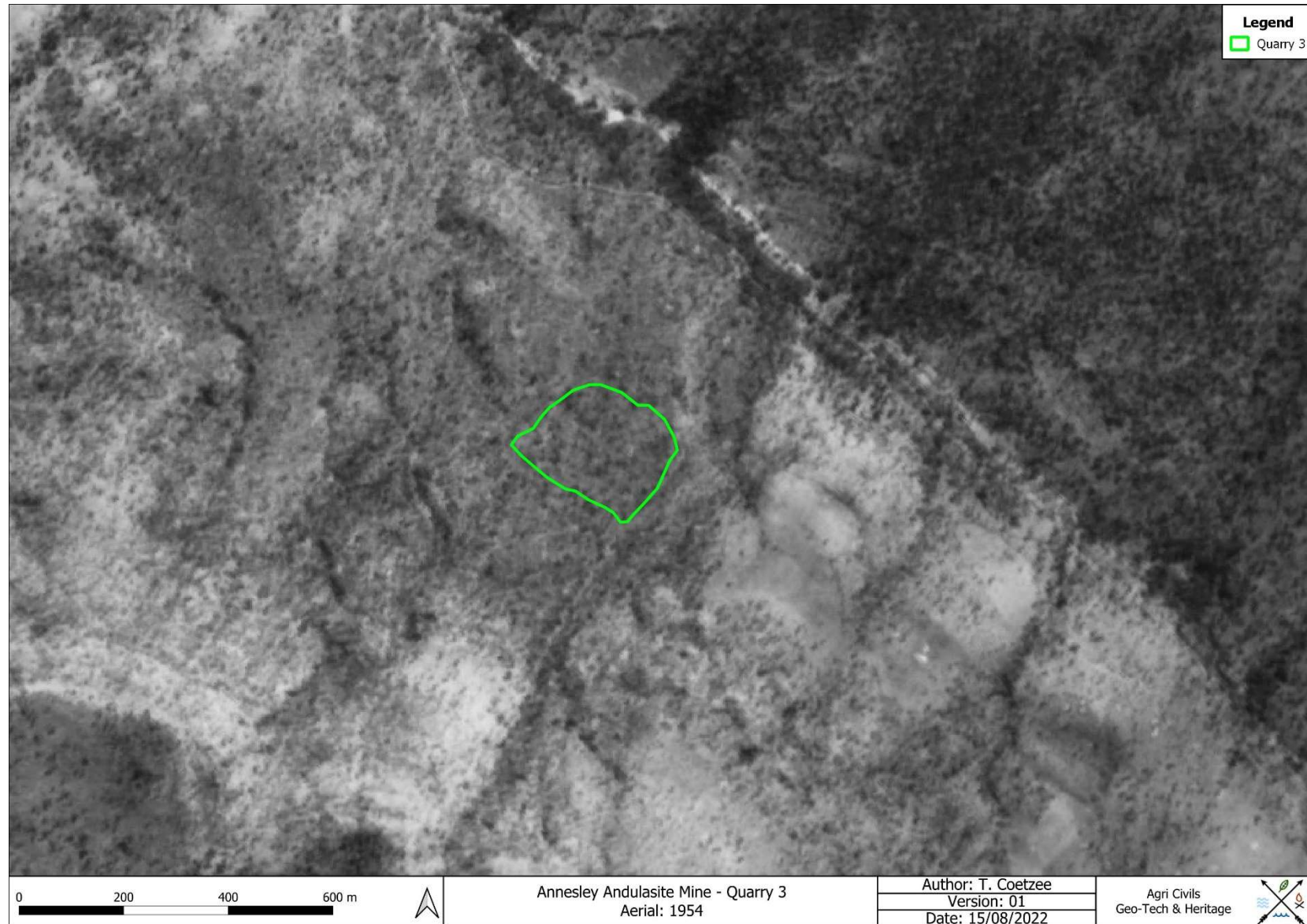
Tobias Coetzee  
MA (Archaeology)



## **Appendix A: Historical Aerial Images & Topographical Maps**

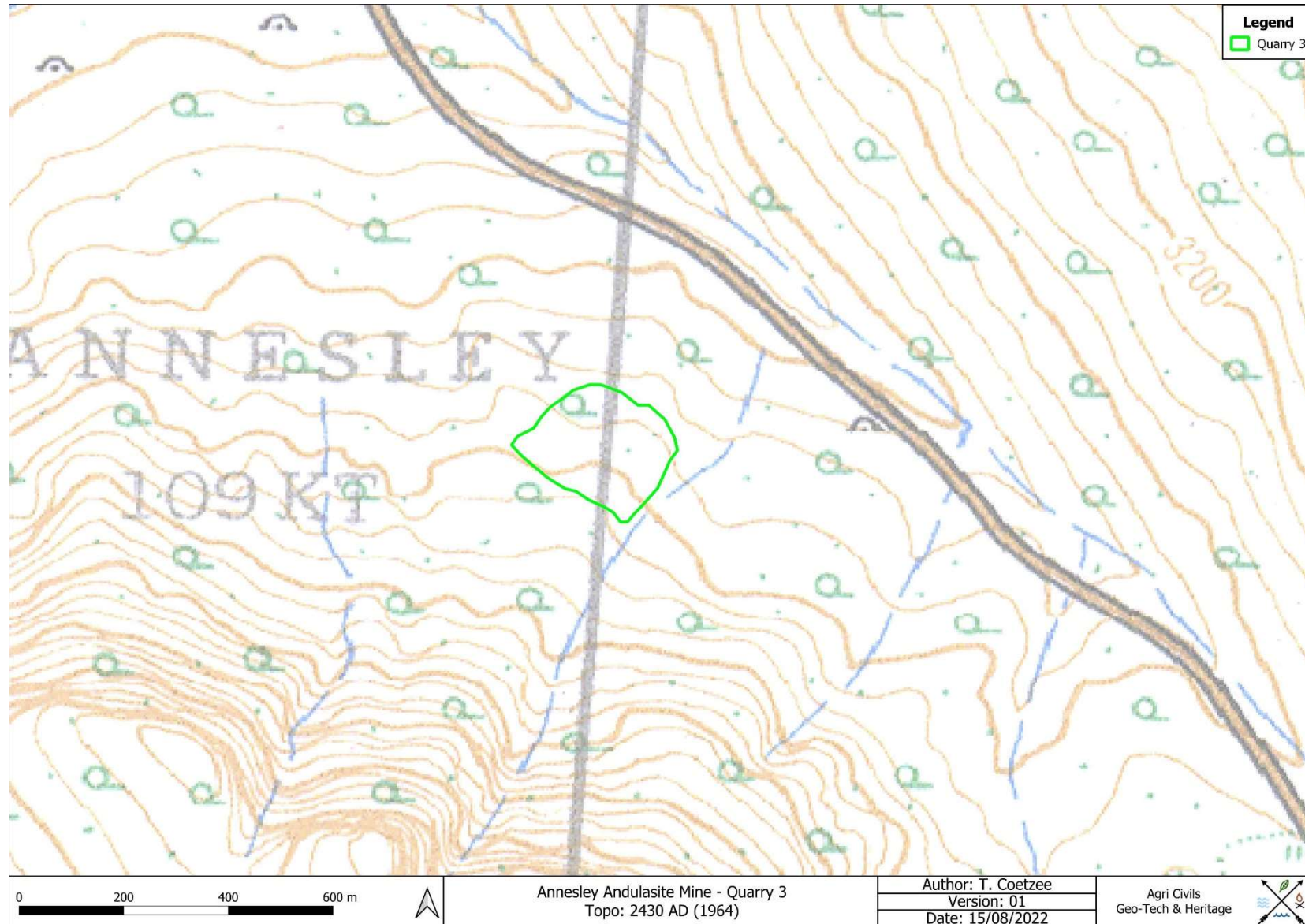


**Figure 3:** Study area superimposed on a 1938 aerial image.

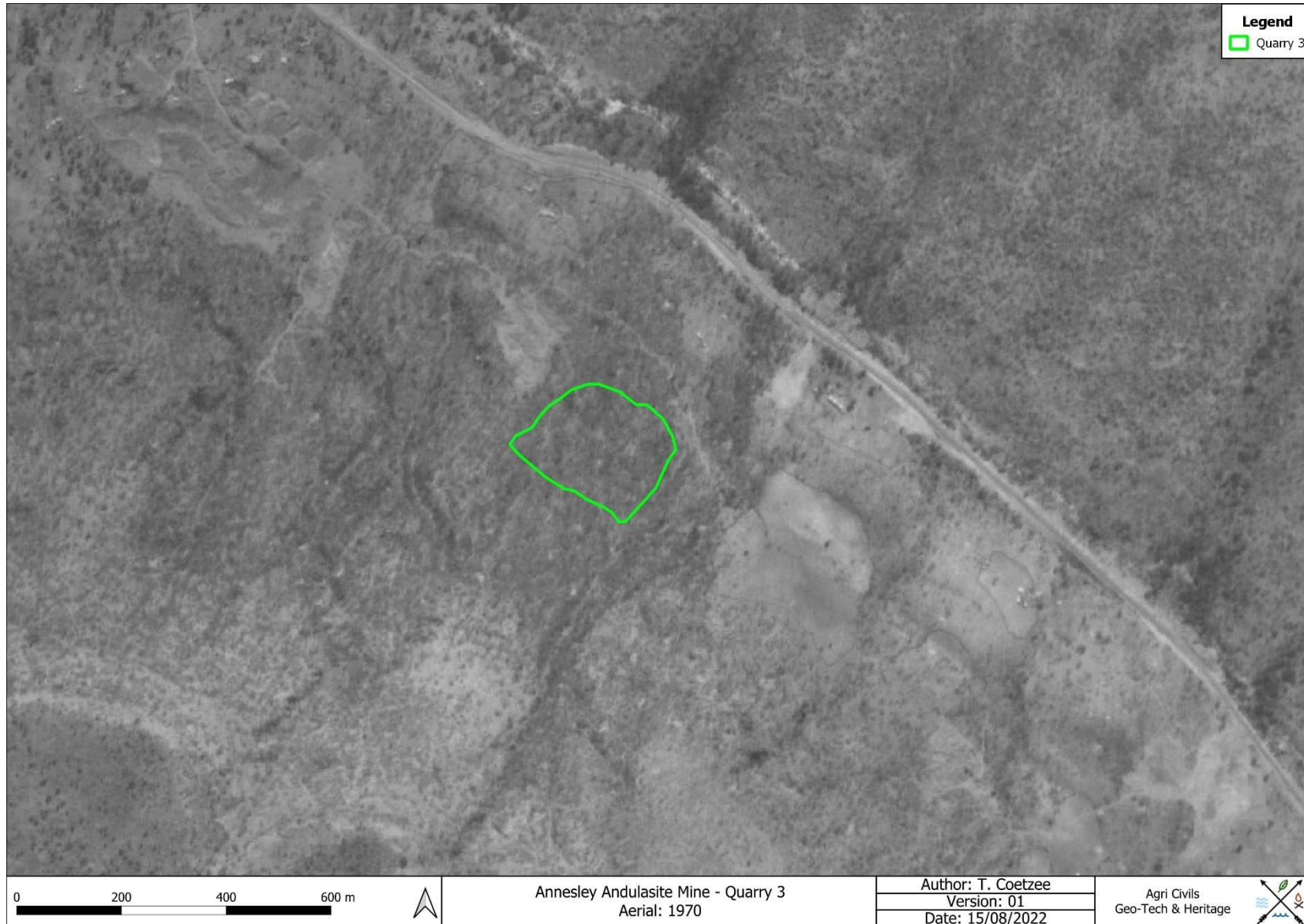


**Figure 4:** Study area superimposed on a 1954 aerial image.

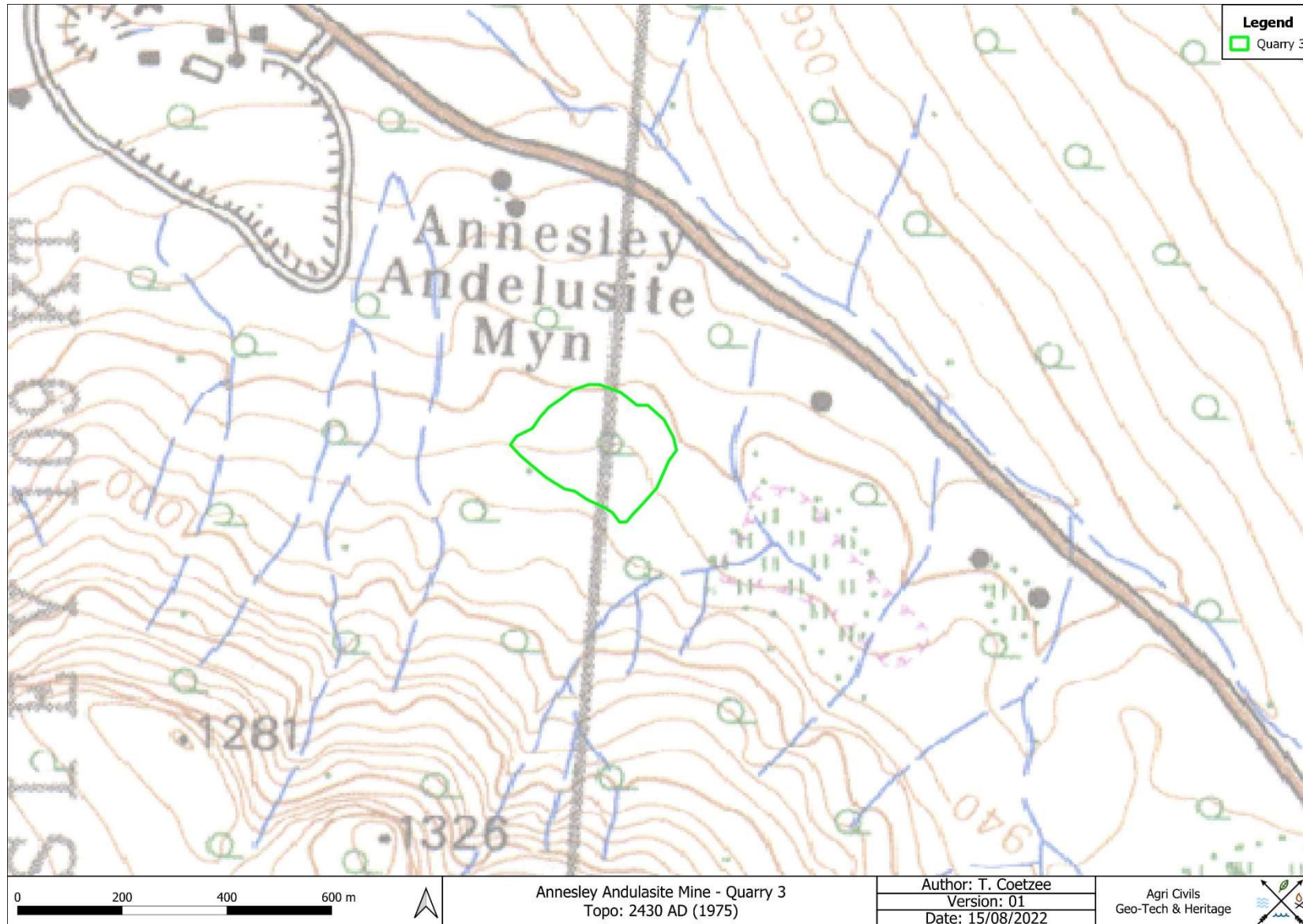




**Figure 5:** Study area superimposed on a 1964 topographical map.



**Figure 6:** Study area superimposed on a 1970 aerial image.



**Figure 7:** Study area superimposed on a 1975 topographical map.



**Figure 8:** Study area superimposed on a 1986 aerial image.

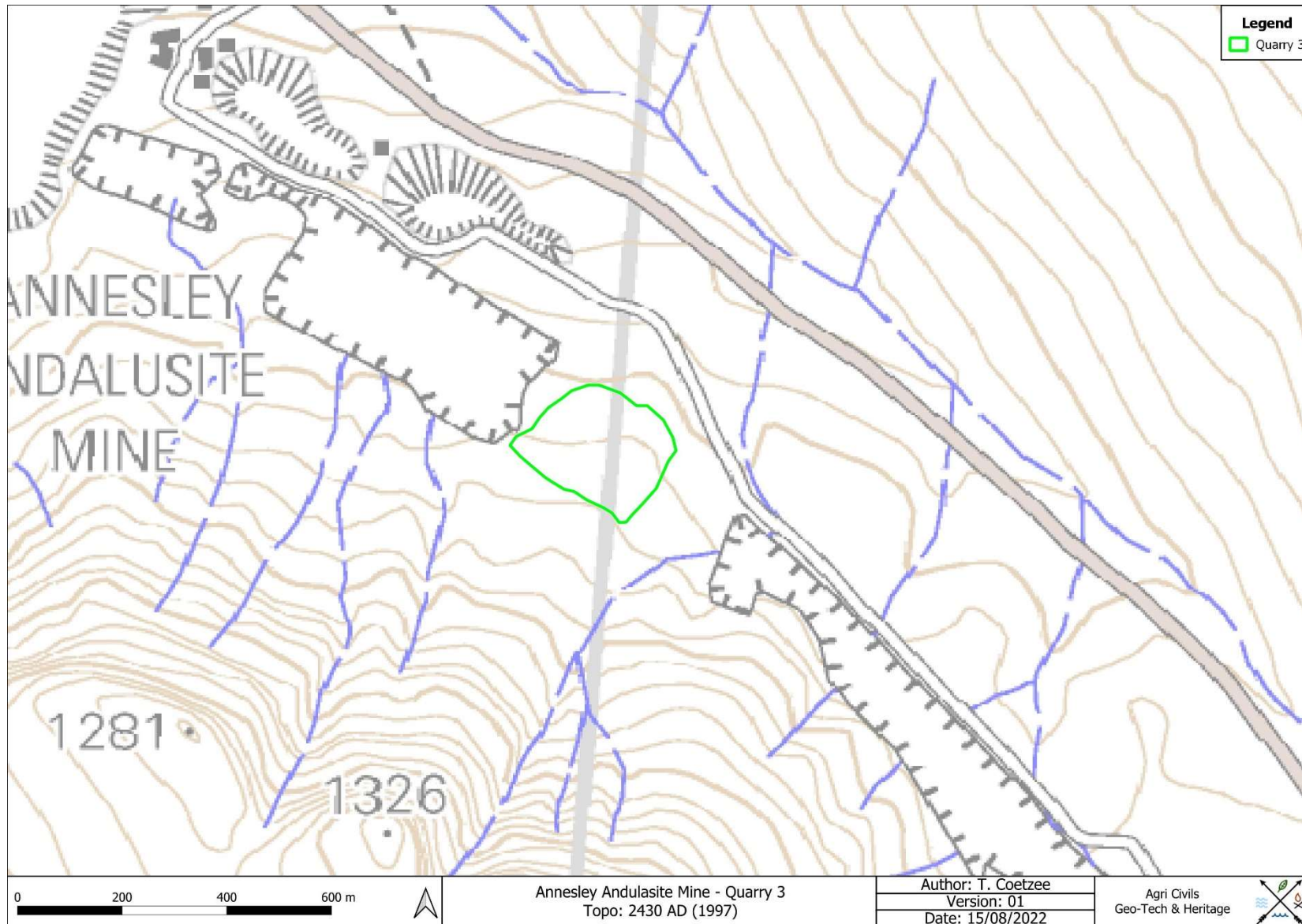


Figure 9: Study area superimposed on a 1997 topographical map.



**Figure 10:** Study area superimposed on a 2002 aerial image.

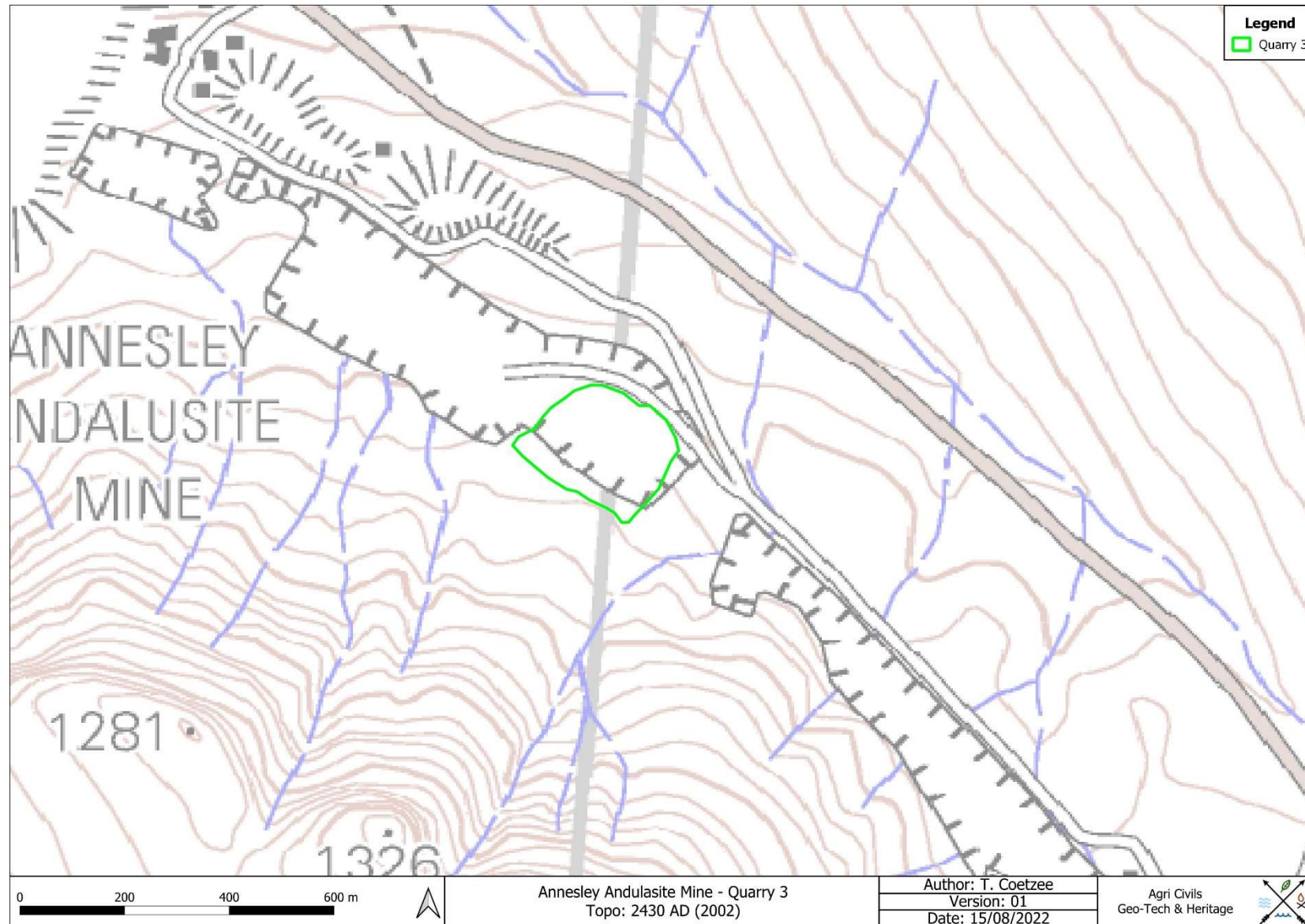
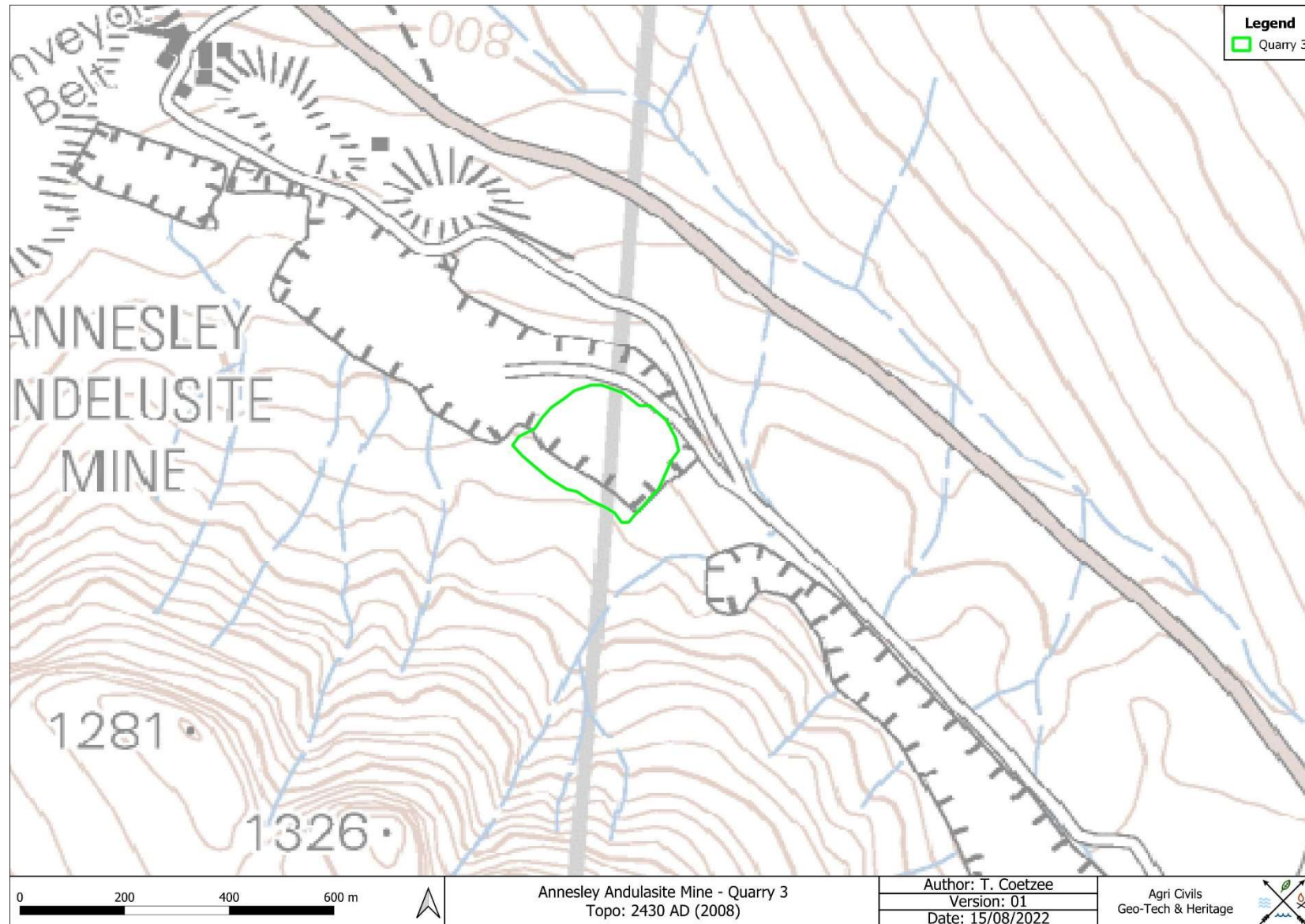
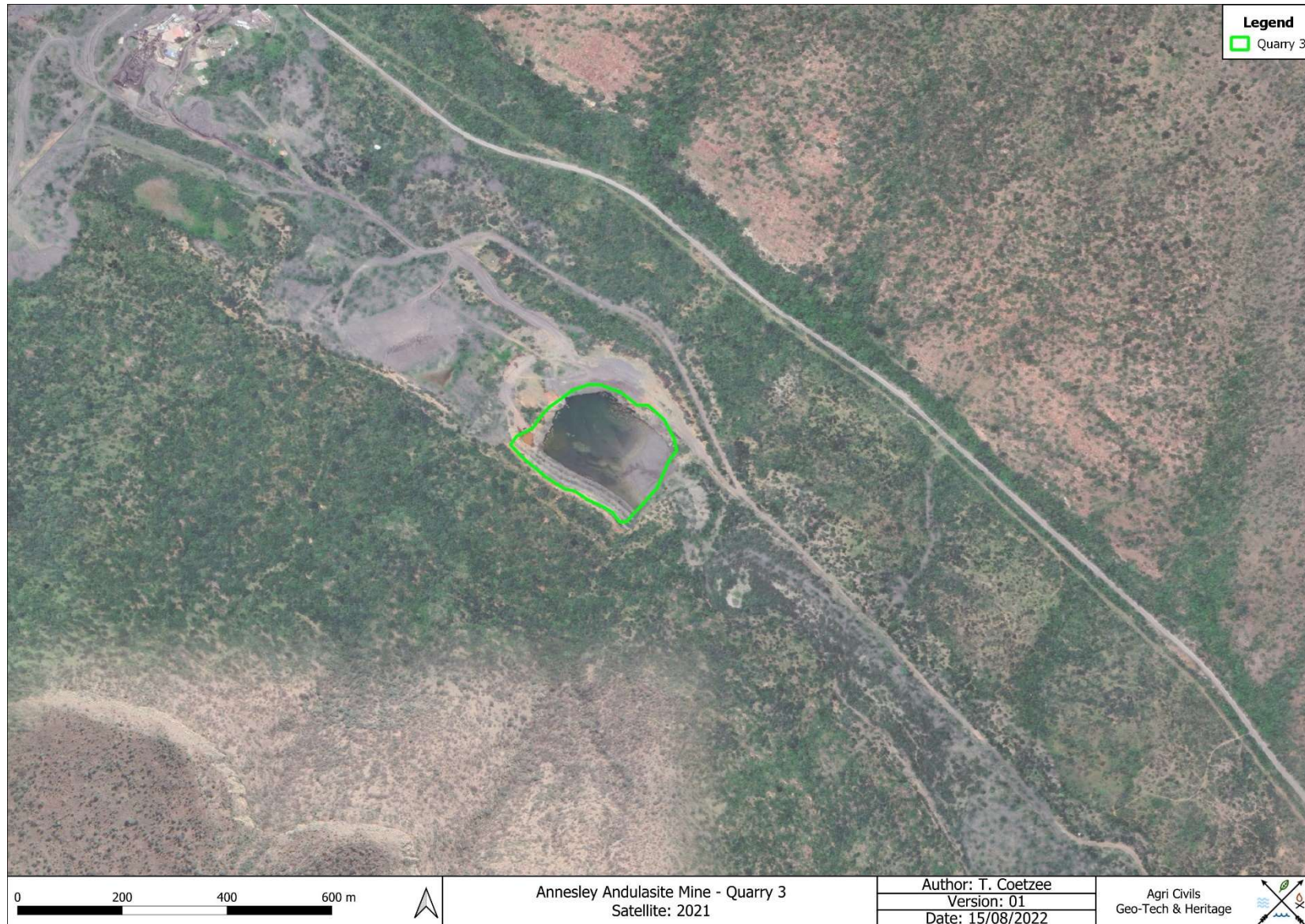


Figure 11: Study area superimposed on a 2002 topographical map.



**Figure 12:** Study area superimposed on a 2008 topographical map.





**Figure 13:** Study area superimposed on a 2021 satellite image.