HERITAGE IMPACT ASSESSMENT

(REQUIRED UNDER SECTION 38(8) OF THE NHRA (No. 25 OF 1999)

FOR THE PROPOSED DWARSRIVIER CHROME MINE EXPANSION, STEELPOORT, LIMPOPO PROVINCE

Type of development:

Mining development

Client:

Dwarsrivier Chrome Mine (Pty) Ltd

Client info:

Tanja Bekker - Envirogistics

E - mail: tanja@envirogistics.co.za

Developer: Dwarsrivier Chrome Mine (Pty) Ltd



HCAC - Heritage Consultants

Private Bag X 1049 Suite 34 Modimolle 0510

Tel: 082 373 8491 Fax: 086 691 6461

E-Mail: jaco.heritage@gmail.com

Report Author:

Mr. J. van der Walt

Project Reference:

HCAC Project number 217128

Report date:

December 2017

APPROVAL PAGE

Project Name	Dwarsrivier Chrome Mine
Report Title	Heritage Impact Assessment Dwarsrivier Chrome Mine
Authority Reference Number	SAHRA Case Number 11804
Report Status	Draft Report
Applicant Name	Dwarsrivier Chrome Mine (Pty) Ltd

	Name	Signature	Qualifications and Certifications	Date
Document Compilation	Jaco van der Walt	Walt.	MA Archaeology ASAPA #159	December 2017
	Liesl Bester	Jer.	BHCS Honours	December 2017

DOCUMENT PROGRESS

Distribution List

Date	Report Reference Number	Document Distribution	Number of Copies
18 December 2017	217128	Envirogistics	Electronic Copy

Amendments on Document

Date	Report Reference Number	Description of Amendment

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REPORT OUTLINE

Appendix 6 of the GNR 326 EIA Regulations published on 7 April 2017 provides the requirements for specialist reports undertaken as part of the environmental authorisation process. In line with this, Table 1 provides an overview of Appendix 6 together with information on how these requirements have been met.

Table 1. Specialist Report Requirements.

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of -	Section a
(i) the specialist who prepared the report; and	Section 12
(ii) the expertise of that specialist to compile a specialist report including a	
curriculum vitae	
(b) Declaration that the specialist is independent in a form as may be specified by the	Declaration of
competent authority	Independence
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 1
(cA)an indication of the quality and age of base data used for the specialist report	Section 3.4 and 7.1.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed	9
development and levels of acceptable change;	
(d) Duration, Date and season of the site investigation and the relevance of the season	Section 3.4
to the outcome of the assessment	
(e) Description of the methodology adopted in preparing the report or carrying out the	Section 3
specialised process inclusive of equipment and modelling used	
(f) details of an assessment of the specific identified sensitivity of the site related to	Section 8 and 9
the proposed activity or activities and its associated structures and infrastructure,	
inclusive of a site plan identifying site alternatives;	
(g) Identification of any areas to be avoided, including buffers	Section 8 and 9
(h) Map superimposing the activity including the associated structures and	Section 8
infrastructure on the environmental sensitivities of the site including areas to be	
avoided, including buffers	
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 3.7
(j) a description of the findings and potential implications of such findings on the impact	Section 9
of the proposed activity including identified alternatives on the environment or	
activities;	
(k) Mitigation measures for inclusion in the EMPr	Section 9
(I) Conditions for inclusion in the environmental authorisation	Section 9
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 9
(n) Reasoned opinion -	Section 9.2
(i) as to whether the proposed activity, activities or portions thereof should be	
authorised;	
(iA) regarding the acceptability of the proposed activity or activities; and	
(ii) if the opinion is that the proposed activity, activities or portions thereof	
should be authorised, any avoidance, management and mitigation measures	
that should be included in the EMPr, and where applicable, the closure plan	
(o) Description of any consultation process that was undertaken during the course of	Section 6
preparing the specialist report	
(p) A summary and copies of any comments received during any consultation process	Refer to BA report
and where applicable all responses thereto; and	0 11 12
(q) Any other information requested by the competent authority	Section 10



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Executive Summary

Envirogistics are conducting a Basic Assessment for the Dwarsrivier Chrome Mine (Pty) Ltd situated approximately 60km northwest of Lydenburg, 25km south of Steelpoort and 63km northeast of Roossenekal in the Limpopo Province. HCAC was appointed to conduct a Heritage Impact Assessment for the proposed expansion activities to determine the presence of cultural heritage sites and the impact of the proposed development on these non-renewable resources. The study area was assessed both on desktop level and by a field survey. The field survey was conducted as a non-intrusive pedestrian survey to cover the extent of the proposed development.

No archaeological sites or material of significance was recorded during the survey. A paleontological desktop study found that the proposed impact area is underlain by palaeontologically insignificant intrusive igneous rocks and there is little chance of finding fossil material (Rossouw 2017). No further mitigation prior to construction is recommended in terms of the archaeological and paleontological components of Section 35 for the proposed development to proceed.

In terms of the built environment of the area (Section 34), no standing structures older than 60 years occur within the study areas. In terms of Section 36 of the Act no burial sites were recorded. If any graves are located in future they should ideally be preserved *in-situ* or alternatively relocated according to existing legislation. No public monuments are located within or close to the study area. The area is extensively mined and the proposed project is in line with the current land use and will not impact negatively on significant cultural landscapes or viewscapes. During the public participation process conducted for the project no heritage concerns was raised.

Due to the lack of significant heritage resources in the study area the impact of the proposed project on heritage resources is considered low and it is recommended that the proposed project can commence on the condition that the following recommendations are implemented as part of the EMPr and based on approval from SAHRA:

Implementation of a chance find procedure that include a protocol for palaeontological finds.

HCAC

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Declaration of Independence

Specialist Name	Jaco van der Walt
Declaration of Independence	I declare, as a specialist appointed in terms of the National Environmental Management Act (Act No 108 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations, that I: • I act as the independent specialist in this application;
	 I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant; I declare that there are no circumstances that may compromise my objectivity in
	 performing such work; I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
	 I will comply with the Act, Regulations and all other applicable legislation; I have no, and will not engage in, conflicting interests in the undertaking of the activity; I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
	 All the particulars furnished by me in this form are true and correct; and I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.
Signature	Walt.
Date	18/12/2017

a) Expertise of the specialist

Jaco van der Walt has been practising as a CRM archaeologist for 15 years. He obtained an MA degree in Archaeology from the University of the Witwatersrand focussing on the Iron Age in 2012 and is a PhD candidate at the University of Johannesburg focussing on Stone Age Archaeology with specific interest in the Middle Stone Age (MSA) and Later Stone Age (LSA). Jaco is an accredited member of ASAPA (#159) and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, KZN as well as he Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, DRC Zambia and Tanzania. Through this he has a sound understanding of the IFC Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage.



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ABBREVIATIONS

AIA: Archaeological Impact Assessment
ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
BIA: Basic Impact Assessment
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DEA: Department of Environmental Affairs
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMP: Environmental Management Programme
ESA: Early Stone Age
ESIA: Environmental and Social Impact Assessment
GIS Geographical Information System
GPS: Global Positioning System
GRP Grave Relocation Plan
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act
MSA: Middle Stone Age
NEMA National Environmental Management Act, 1998 (Act No. 107 of 1998)
NHRA National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NID Notification of Intent to Develop
NoK Next-of-Kin
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

^{*}Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.

GLOSSARY

Archaeological site (remains of human activity over 100 years old)
Early Stone Age (~ 2.6 million to 250 000 years ago)
Middle Stone Age (~ 250 000 to 40-25 000 years ago)
Later Stone Age (~ 40-25 000, to recently, 100 years ago)
The Iron Age (~ AD 400 to 1840)
Historic (~ AD 1840 to 1950)
Historic building (over 60 years old)



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1 Introduction and Terms of Reference:

Heritage Contracts and Archaeological Consulting CC (**HCAC**) has been contracted by Envirogistics to conduct a heritage impact assessment of the proposed expansion of the Dwarsrivier Mine. The report forms part of the Basic Assessment Report (BAR) and Environmental Management Programme Report (EMPR) for the development.

The aim of the study is to survey the proposed development footprint to identify cultural heritage sites, document, and assess their importance within local, provincial and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999). The report outlines the approach and methodology utilized before and during the survey, which includes: Phase 1, review of relevant literature; Phase 2, the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

During the survey, no heritage sites were identified. General site conditions and features on sites were recorded by means of photographs, GPS locations, and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report. SAHRA as a commenting authority under section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) require all environmental documents, complied in support of an Environmental Authorisation application as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA. As such the Basic Assessment report and its appendices must be submitted to the case as well as the EMPr, once it's completed by the Environmental Assessment Practitioner (EAP).

1.1 Terms of Reference

Field study

Conduct a field study to: (a) locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources affected by the proposed development.

Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with the relevant legislation, SAHRA minimum standards and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999).



Table 2: Project Description

Size of farm and portions	The total extent of the proposed project activities will be 15
	ha located on Portion 1 and the remainder of the farm
	Dwarsrivier 372 KT
Magisterial District	Greater Tubatse Local Municipality
1: 50 000 map sheet number	1:50 000 topographical map 2430 CC
Central co-ordinate of the development	24° 55' 17.7769" S, 30° 06' 45.6062" E

Table 3: Infrastructure and project activities

Type of development	Mining development	
Project size	15 hectares	
Project Components	The proposed surface expansion activities include the discard dump	
	by 13 ha; the metallurgical plant stockpile area by 0.7 ha; a new	
	sewerage treatment plant will be constructed and it will be 0.06 ha; a	
	workshop area will be 0.2 ha; and the loadout area will be 0.9 ha. The	
	total extent of the proposed project activities will be 15 ha	



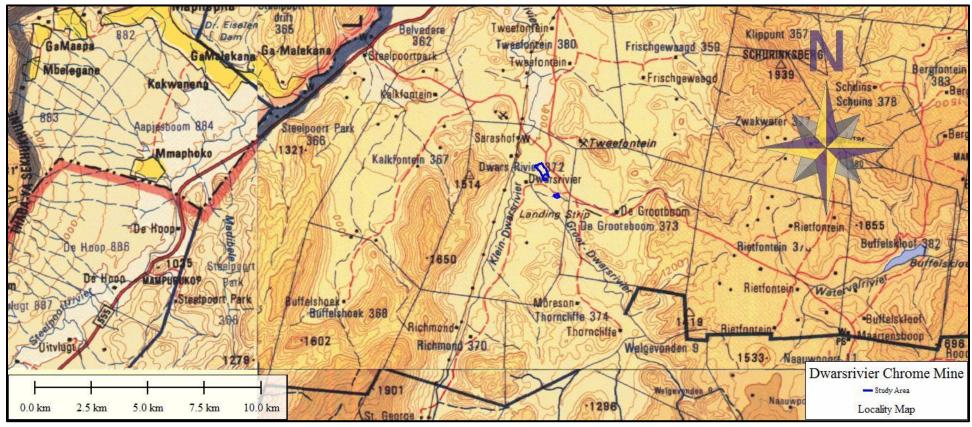


Figure 1. Provincial locality map (1: 250 000 topographical map).



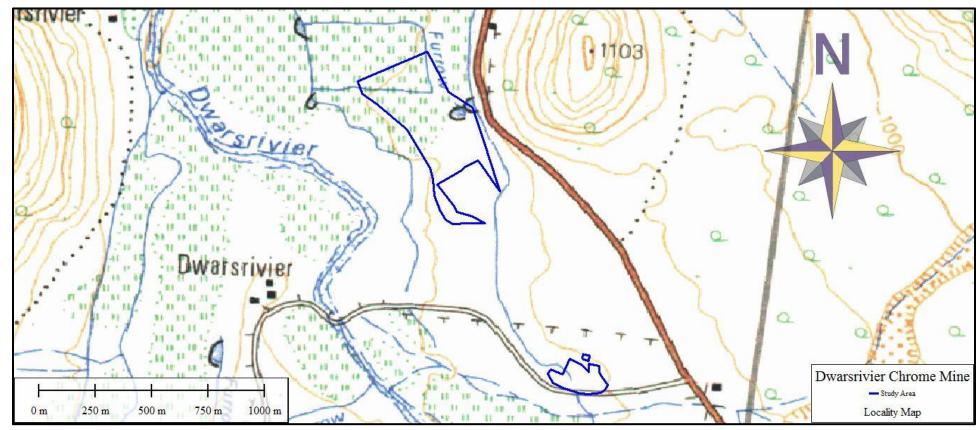


Figure 2. Regional locality map (1:50 000 topographical map).





Figure 3: Satellite image indicating the development footprint (Google Earth 2017).



2 Legislative Requirements

The HIA, as a specialist sub-section of the EIA, is required under the following legislation:

- National Heritage Resources Act (NHRA), Act No. 25 of 1999)
- National Environmental Management Act (NEMA), Act No. 107 of 1998 Section 23(2)(b)
- Mineral and Petroleum Resources Development Act (MPRDA), Act No. 28 of 2002 Section 39(3)(b)(iii)

A Phase 1 HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources; and
- Make recommendations for the appropriate heritage management of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMPr, to the PHRA if established in the province or to SAHRA. SAHRA will ultimately be responsible for the professional evaluation of Phase 1 AIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 AIA reports and additional development information, as per the impact assessment report and/or EMPr, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 AIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years postuniversity CRM experience (field supervisor level). Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 AlA's are primarily concerned with the location and identification of heritage sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision-making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for with SAHRA by the applicant before development may proceed.



Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance No. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).



3 METHODOLOGY

3.1 Literature Review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

3.2 Genealogical Society and Google Earth Monuments

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located; these locations were marked and visited during the field work phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any BAR process, it involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern (for the purposes of this report only heritage related issues will be included). The aim of the public consultation process was to capture and address any issues raised by community members and other stakeholders during key stakeholder and public meetings. The process involved:

- Placement of advertisements and site notices
- Stakeholder notification (through the dissemination of information and meeting invitations);
- Stakeholder meetings undertaken with I&APs;
- Authority Consultation
- The compilation of a Basic Assessment Report (BAR).

Please refer to section 6 for more detail.

3.4 Site Investigation

Conduct a field study to: a) systematically survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources recorded in the project area.

Table 4: Site Investigation Details

	Site Investigation
Date	13 December 2017
Season	Summer. Vegetation is high however the development footprint was adequately surveyed to record the presence of heritage sites (Figure 4 & 5).





Figure 4: Track logs of the survey in black at the discard dump.





Figure 5: Track logs of the survey in black at the Met Grade expansion area.





3.5 Site Significance and Field Rating

Section 3 of the NHRA distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa's history;
- Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface. This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance with cognisance of Section 3 of the NHRA:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- The wider historic, archaeological and geographic context of the site;
- The location of the site in relation to other similar sites or features;
- The depth of the archaeological deposit (when it can be determined/is known);
- The preservation condition of the sites; and
- Potential to answer present research questions.

In addition to this criteria field ratings prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 10 of this report.



FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	-	Conservation; national site
			nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site
			nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be
			retained)
Generally Protected A (GP.A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP.B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

3.6 Impact Assessment Methodology

The criteria below are used to establish the impact rating on sites:

- The nature, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The extent, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- The duration, wherein it will be indicated whether:
 - * the lifetime of the impact will be of a very short duration (0-1 years), assigned a score of 1;
 - * the lifetime of the impact will be of a short duration (2-5 years), assigned a score of 2;
 - * medium-term (5-15 years), assigned a score of 3;
 - * long term (> 15 years), assigned a score of 4; or
 - permanent, assigned a score of 5;
 - The **magnitude**, quantified on a scale from 0-10 where; 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
 - The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1-5 where; 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
 - The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
 - the status, which will be described as either positive, negative or neutral.
 - the degree to which the impact can be reversed.
 - the degree to which the impact may cause irreplaceable loss of resources.
 - the *degree* to which the impact can be mitigated.



The **significance** is calculated by combining the criteria in the following formula:

S=(E+D+M)P

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is
 effectively mitigated),
- 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

3.7 Limitations and Constraints of the study

The authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the subsurface nature of archaeological artefacts, the possibility exists that some features or artefacts may not have been discovered/recorded during the survey and the possible occurrence of unmarked graves and other cultural material cannot be excluded. Similarly, the depth of the deposit of heritage sites cannot be accurately determined due its subsurface nature. This report only deals with the footprint area of the proposed development and consisted of non-intrusive surface surveys. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components would have been highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this Impact Assessment.

4 Description of Socio Economic Environmental

According to Stats Sa the following applies to the Thubatse Municipality: "The population size is 335 676. The population in the municipality is constituted by 97,8% black African, 1,6% white people, with other population groups making up the remaining 0,7. The sex ratio in the municipality is 88, meaning that for every 100 women there are 88 men. Languages spoken in the municipality include Sepedi (78,6%), Tsonga (6,9%), isiNdebele (3,8%), isiZulu (2,1%) and other languages make up 8,6%. Of those aged 20 years and older, 22,6% have completed matric and 6,6% have some form of higher education.... The municipality has a weak economic base and high poverty levels. The Burgersfort town in the municipality has been identified as a growth point in the province because of its mining activities. A potential to grow the economic base in the municipality, through tourism, has been brought by the availability of natural resources. Poverty alleviation projects implemented by the municipality have improved the socio-economic conditions."



5 Description of the Physical Environment

The study area is situated approximately 60km northwest of Lydenburg, 25km south of Steelpoort and 63km northeast of Roossenekal in the Limpopo Province. The study area forms part of the Dwarsrivier Valley part of the Bushveld Igneous Complex. The area has been transformed over the years firstly by agricultural fields (Figure 2) especially at the discard dump expansion area and more recently by mining related activities like roads (Figure 6), water pipelines (Figure 7) and power lines.

The proposed discard dump is located adjacent and to the north of the existing dump and is bordered by the tar road to Twin river mine on the west and by an internal excess road on the east. A large quarry (Figure 8) is located in the southern portion of the proposed expansion. The Met Grade expansion site is bordered by the existing sewerage works and mine (figure 9) on the north and a gravel road to the south and the west.





Figure 6. Existing roads at the Met grade expansion area.



Figure 7. Existing pipelines at the Met grade expansion area.



Figure 8. Quarry next to existing dump.



Figure 9. Existing mine next to Met Grade expansion area.





Figure 10. Met Grade Expansion area general site conditions.



Figure 11. Met Grade Expansion area general site conditions.



Figure 12. Discard dump expansion area general site conditions.



Figure 13. Discard dump expansion area general site conditions.



6 Results of Public Consultation and Stakeholder Engagement:

6.1.1 Stakeholder Identification

Adjacent landowners and the public at large were informed of the proposed activity as part of the BA process. Site notices and advertisements notifying interested and affected parties were placed at strategic points and in local newspapers as part of the process.

7 Literature / Background Study:

7.1 Literature Review

In anticipation of other mining activities in the greater study area, archaeologists have completed numerous heritage surveys including Huffman & Schoeman 2001, 2002 a and b; van Schalkwyk 2005; Roodt 2003a, 2003b, 2003c, 2005, 2008a, 2008b; Van der Walt & Fourie 2006; Van der Walt & Celliers 2009; Van der Walt 2009; 2016 and Pistorius 2007, 2010, 2011 for various Environmental Impact Assessment Reports (EIAs) and Environmental Management Programmes (EMPs). These studies provide a good understanding of the archaeology of the area and use of the wider landscape. Since 2001, heritage surveys have recorded more than 240 sites in the greater study area, ranging from the Middle Stone Age to the recent households of farm labourers.

The distribution of the sites on the landscape show different land use patterns. Many agriculturally-orientated societies (making Eiland, Leolo and Marateng pottery) built their villages in the valleys near cultivatable alluvium. Others (probably Ndebele) built terraced-settlements on basal slopes of the valley edge, while farm labourers usually lived in the valleys as well.

During the 19th Century, farmers lived around the edge of high meadows as a measure of protection. A few Middle Iron Age Eiland sites were also cited in this plateau environment. Grave sites can be expected anywhere on the landscape.

7.1.1 Genealogical Society and Google Earth Monuments

No known grave sites are indicated in the study area.



7.2 General History of the area

7.2.1 Archaeology of the area

The archaeological record for the greater study area consists of the Stone Age and Iron Age.

7.2.1.1 Stone Age

South Africa has a long and complex Stone Age sequence of more than 2 million years. The broad sequence includes the Later Stone Age, the Middle Stone Age and the Earlier Stone Age. Each of these phases contains sub-phases or industrial complexes, and within these we can expect regional variation regarding characteristics and time ranges. For Cultural Resources Management (CRM) purposes it is often only expected/ possible to identify the presence of the three main phases.

Yet sometimes the recognition of cultural groups, affinities or trends in technology and/or subsistence practices, as represented by the sub-phases or industrial complexes, is achievable (Lombard 2012). The three main phases can be divided as follows:

- Later Stone Age: associated with Khoi and San societies and their immediate predecessors. Recently to ~30 thousand years ago
- Middle Stone Age: associated with Homo sapiens and archaic modern humans. 30-300 thousand years ago.
- Earlier Stone Age: associated with early Homo groups such as Homo habilis and Homo erectus. 400 000-> 2 million years ago.

Middle Stone Age isolated artefacts are found scattered over the landscape. Finds typically include radial cores, triangular points and flakes. These artefacts are scattered too sparsely to be of any significance (Van der Walt 2016).

7.2.1.2 The Iron Age

The Iron Age as a whole represents the spread of Bantu speaking people and includes both the pre-Historic and Historic periods. It can be divided into three distinct periods:

- The Early Iron Age: Most of the first millennium AD.
- The Middle Iron Age: 10th to 13th centuries AD
- The Late Iron Age: 14th century to colonial period.

The Iron Age is characterised by the ability of these early people to manipulate and work Iron ore into implements that assisted them in creating a favourable environment to make a better living. Most of the decorated pottery found in the study area belongs to the stylistic facies known as *Eiland*. This style dates to between 1550 AD and 1750 AD and was made by Sotho-Tswana people (Huffman 2007: 186-189). These Middle Iron Age Sites do not have any stone walling associated with them and is found close to cultivatable soil. Some stylistic *Marateng* pottery were also recorded presumably in association with Late Iron Age stone walled settlements. *Marateng* pottery dates to between 1650 AD and 1840 AD (Huffman 2007: 207).

7.3 Historical Information

European occupation began in 1845 when trekkers established Ohrigstad and then Lydenburg a few years later. Originally, the trekkers were interested in ivory, but they also needed land and labour for agriculture. Tensions with African communities over these needs rose to such a point that the Trekkers attacked the Pedi capital in 1852. They failed, however, to destroy



Pedi authority. Somewhat later, they negotiated a peace with Sekwati and traded cattle for land. Boers then started to establish farms in the region. GS Maree, for example, settled on Mareesburg in 1871. Tensions over land and labour increased again until the ZAR attacked the Pedi capital in 1876: this battle also failed to break Pedi resistance.

This brief historical outline helps to date some other sites in the study area. In particular, a number of settlements located around high meadows probably date from 1860 to 1880, when tensions were high but before major European occupation of local farms

7.3.1 Anglo-Boer War

The Anglo-Boer War was the greatest conflict that had taken place in South Africa up to date. No sites relating to the war are known to occur in the study area.

7.3.2 Cultural Landscape

The site under investigation is located about 14 kilometres south west of Steelpoort, and about 13 km east of the R555 Main Road in Mpumalanga Province in an area that is extensively mined.



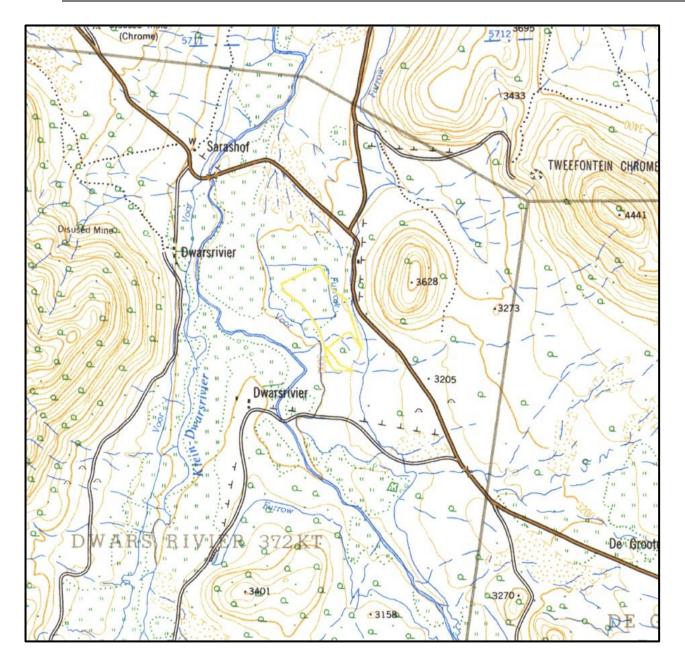


Figure 14. 1963 Topographical map of the site under investigation. The approximate study area is indicated with a yellow border. The study area was used as cultivated lands at the time, and some streams and a furrow went through the area. A secondary road can be seen to the east of the study area. (Topographical Map 1966)



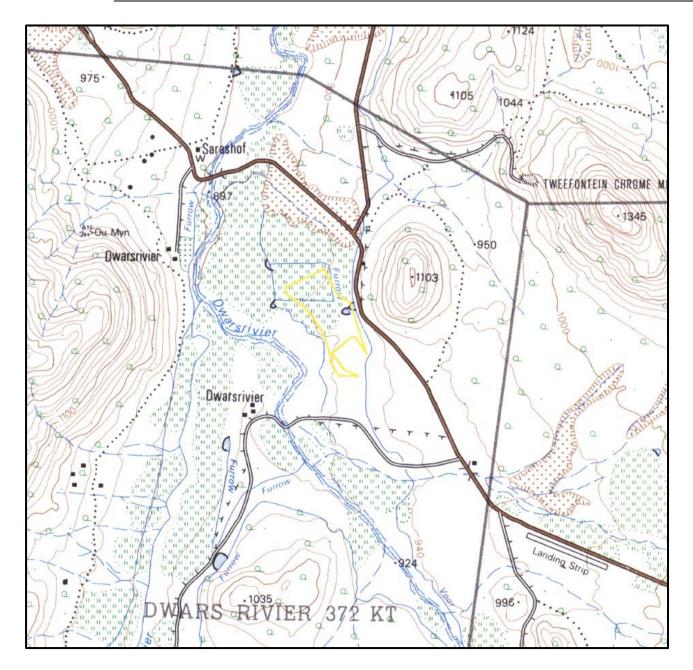


Figure 15. 1976 Topographical map of the site under investigation. The approximate study area is indicated with a yellow border. A large part of the site was used as cultivated lands, and a small dam and a water furrow can be seen in the area under investigation. (Topographical Map 1976)



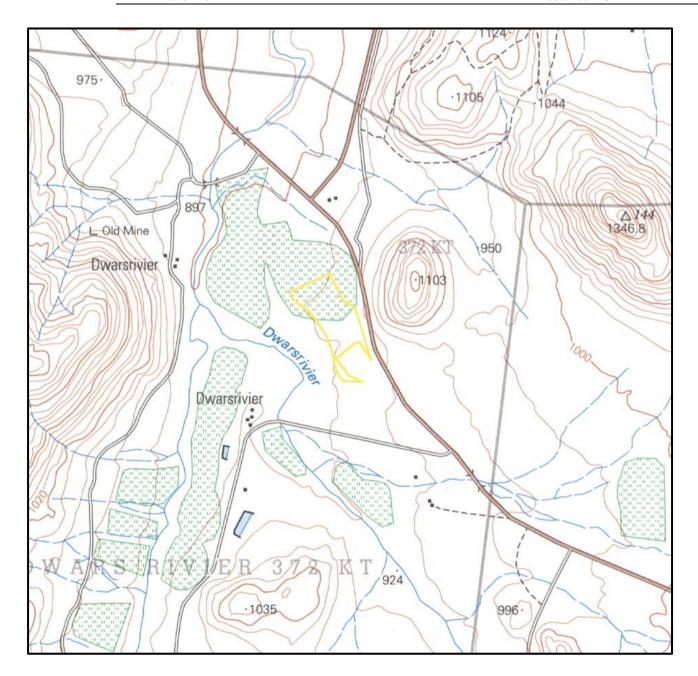


Figure 16. 1997 Topographical map of the site under investigation. The approximate study area is indicated with a yellow border. A large part of the study area was still used as cultivated lands. No other developments are visible. (Topographical Map 1997)



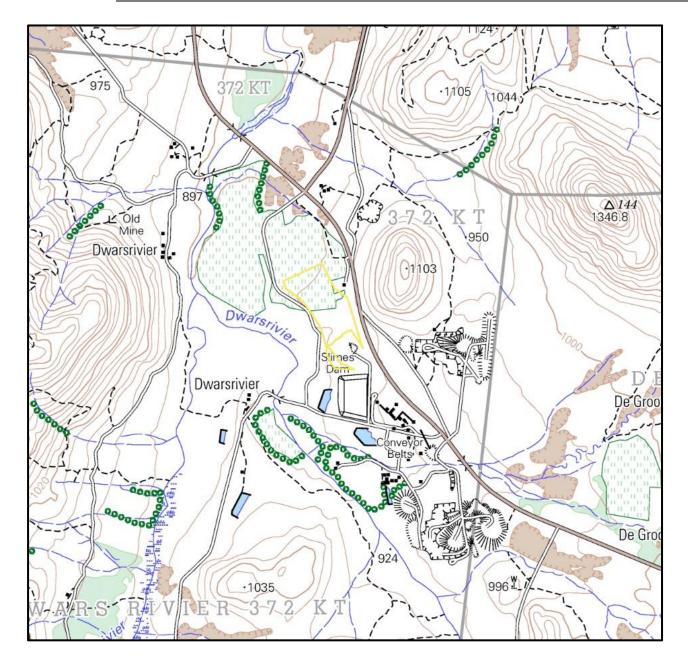


Figure 17. 2002 Topographical map of the site under investigation. The approximate study area is indicated with a yellow border. A large part of the study area was still used as cultivated lands. A farm road had been constructed along the western border of the site. A building can be seen between the site and the main road, on the eastern side of the property. A mine dump and a slimes dam are visible to the south of the site under investigation. (Topographical Map 2002)





Figure 18. 2017 Google Earth image showing the study area in relation to Steelpoort and the R555. (Google Earth 2017)

8 Findings of the Survey

It is important to note that only the footprint of the proposed Discard dump, Met Grade expansion area, new sewage treatment plant, workshop and load out was surveyed. These areas were surveyed over a period of 1 day.

The previous agricultural activities at the proposed discard dump expansion area (approximately 15 ha) is still evident as most of the area is still devoid of trees as it was cleared for fields to be ploughed and planted. These old fields are now covered with a lush presence of various grass types. This area is also impacted on by an old quarry, gravel access roads and a powerline. The Met Grade expansion area, new sewage treatment plant, workshop and load out measures approximately 3 hectares. This area is situated adjacent to the existing mine and is impacted on by roads, earthworks, power lines and water pipelines.

Most of the areas assessed were previously disturbed. No sites or finds of heritage value or significance were identified within the investigated areas.



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8.1 Built Environment (Section 34 of the NHRA)

No standing structures older than 60 years occur in the study area.

8.2 Archaeological and palaeontological resources (Section 35 of the NHRA)

No archaeological sites or material was recorded during the survey. Rossouw (2017) conducted an independent paleontological study and provided a protocol for finds. He concluded that: "The proposed impact area is underlain by palaeontologically insignificant intrusive igneous rocks and there is also little chance of finding fossil material within intact superficial (geologically recent) overburden, mainly because of a lack of suitable alluvium in the area. However, any development occurring within 50 m of a river bank may affect suitably developed overbank sediments (superficial alluvial deposits) with a low to moderate likelihood that it could yield Quaternary vertebrate fossil remains. If, in the event that localized fossil material is discovered exposed or eroding out of intact superficial overburden during the development phase, it will in all probability resemble modern looking, but more or less lithified animal bones and teeth and it will most likely be those belonging to bovids (Bovidae: the biological family of ruminant mammals that includes wildebeest, buffalo, antelopes, etc.)."

Therefore, no further mitigation prior to construction is recommended in terms of the archaeological component of Section 35 of the NHRA for the proposed development to proceed.

8.3 Burial Grounds and Graves (Section 36 of the NHRA)

In terms of Section 36 of the Act no burial sites were recorded.

8.4 Cultural Landscapes, Intangible and Living Heritage.

Long term impact on the cultural landscape is considered to be low as the surrounding area is extensively mined. Visual impacts to scenic routes and sense of place are also considered to be low as the development is in line with the existing mining character of the area.

8.5 Battlefields and Concentration Camps

There are no battlefields or concentration camp sites in the study area.

8.6 Potential Impact

The chances of impacting unknown archaeological sites in the study area is considered to be negligible. Any direct impacts that did occur would be during the construction phase only and would be of low significance. Cumulative impacts occur from the combination of effects of various impacts on heritage resources. The importance of identifying and assessing cumulative impacts is that the whole is greater than the sum of its parts. In the case of the development, it will, with the recommended mitigation measures and management actions, not impact any heritage resources directly. However, this and other projects in the area could have an indirect impact on the larger heritage landscape. The lack of any heritage resources in the immediate area and the extensive existing development surrounding the study area minimises additional impact on the landscape.

8.6.1 Pre-Construction phase:

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure needed for the construction phase. These activities can have a negative and irreversible impact on heritage sites. Impacts include destruction or partial destruction of non-renewable heritage resources.



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8.6.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. These activities can have a negative and irreversible impact on heritage sites. Impacts include destruction or partial destruction of non-renewable heritage resources.

8.6.3 Operation Phase:

No impact is envisaged during this phase.

Table 5. Impact Assessment table.

Nature: During the construction phase activities resulting in disturbance of surfaces and/or sub-surfaces may destroy, damage, alter, or remove from its original position archaeological material or objects.

	Without mitigation	With mitigation (Preservation/ excavation of site)
Extent	Local (1)	Local (1)
Duration	Permanent (5)	Permanent (5)
Magnitude	Low (2)	Low (2)
Probability	Not probable (2)	Not probable (2)
Significance	16 (Low)	16 (Low)
Status (positive or negative)	Negative	Negative
Reversibility	Not reversible	Not reversible
Irreplaceable loss of resources?	No resources were recorded	No resources were recorded.
Can impacts be mitigated?	Yes, a chance find procedure should be implemented.	Yes

Mitigation:

A chance find procedure should be implemented as well as a protocol for fossil finds.

Cumulative impacts:

Since no heritage significant resources occur in the study area cumulative impacts are considered to be low.

Residual Impacts:

If sites are destroyed this results in the depletion of archaeological record of the area.

However, if sites are recorded and preserved or mitigated this adds to the record of the area.



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9 Conclusion and recommendations

HCAC was appointed to conduct a Heritage Impact Assessment to determine the presence of cultural heritage sites and the impact of the proposed development on these non-renewable resources. The study area was assessed both on desktop level and by a field survey. The field survey was conducted as a non-intrusive pedestrian survey to cover the extent of the development footprint.

Most of the areas assessed were previously disturbed. The previous agricultural activities at the proposed discard dump expansion area (approximately 15 ha) is still evident as most of the area is still devoid of trees as it was cleared for fields to be ploughed and planted. This area is also impacted on by an old quarry, gravel access roads and a powerline. The Met Grade expansion area, new sewage treatment plant, workshop and load out area measures approximately 3 hectares. This area is situated adjacent to the existing mine and is also impacted on by roads, earthworks, power lines and water pipelines.

These activities would have impacted on surface indictors of heritage sites and no sites or finds of heritage value or significance were identified within the investigated areas.

No archaeological sites or material of significance was recorded during the survey. A paleontological desktop study found that the proposed impact area is underlain by palaeontologically insignificant intrusive igneous rocks and there is little chance of finding fossil material (Rossouw 2017). No further mitigation prior to construction is recommended in terms of the archaeological and paleontological components of Section 35 for the proposed development to proceed.

In terms of the built environment of the area (Section 34), no standing structures older than 60 years occur within the study areas. In terms of Section 36 of the Act no burial sites were recorded. If any graves are located in future they should ideally be preserved *in-situ* or alternatively relocated according to existing legislation. No public monuments are located within or close to the study area. The area is extensively mined and the proposed project is in line with the current land use and will not impact negatively on significant cultural landscapes or viewscapes. During the public participation process conducted for the project no heritage concerns was raised.

Due to the lack of significant heritage resources in the study area the impact of the proposed project on heritage resources is considered low and it is recommended that the proposed project can commence on the condition that the following chance find procedure and fossil find protocol are implemented as part of the EMPr and based on approval from SAHRA



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9.1. Chance Find Procedures

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist must be contacted for an assessment of the find and therefor chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below.

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find, and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

Rossouw (2017) recommended that the following protocol for paleontological finds should be implemented as part of the EMPr: "In the unlikely event of fossil discovery within previously undisturbed Quaternary overburden, a professional palaeontologist must be called in immediately to confirm and record the finds. In the meantime, ex situ remains must be wrapped in paper towels or heavy-duty tin foil and stored in a safe place. The material should not be washed or cleaned in any way. In situ material must be kept in place and protected from further damage by covering it with light but rigid object like a box, bucket or metal sheet until further confirmation by the palaeontologist" Rossouw (2017).

9.2 Reasoned Opinion

The impact of the proposed project on heritage resources is considered low and no further preconstruction mitigation in terms of archaeological resources is required based on approval from SAHRA. Furthermore, the socio-economic benefits also outweigh the possible impacts of the development if the correct mitigation measures (i.e. chance find procedure) are implemented for the project.



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11. Appendices:

Curriculum Vitae of Specialist

Jaco van der Walt Archaeologist

jaco.heritage@gmail.com +27 82 373 8491 +27 86 691 6461

Education:

Particulars of degrees/diplomas and/or other qualifications:

Name of University or Institution: University of Pretoria

Degree obtained : BA Heritage Tourism & Archaeology

Year of graduation : 2001

Name of University or Institution: University of the Witwatersrand

Degree obtained : BA Hons Archaeology

Year of graduation : 2002

Name of University or Institution : University of the Witwatersrand

Degree Obtained : MA (Archaeology) **Year of Graduation** : 2012

Name of University or Institution : University of Johannesburg

Degree : PhD

Year : Currently Enrolled

EMPLOYMENT HISTORY:

2011 – Present: Owner – HCAC (Heritage Contracts and Archaeological Consulting CC).

2007 – 2010 : CRM Archaeologist, Managed the Heritage Contracts Unit at the

University of the Witwatersrand.

2005 - 2007: CRM Archaeologist, Director of Matakoma Heritage Consultants
2004: Technical Assistant, Department of Anatomy University of Pretoria

2003: Archaeologist, Mapungubwe World Heritage Site

2001 - 2002: CRM Archaeologists, For R & R Cultural Resource Consultants,

Polokwane

2000: **Museum Assistant**, Fort Klapperkop.



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Countries of work experience include:

Republic of South Africa, Botswana, Zimbabwe, Mozambique, Tanzania, The Democratic Republic of the Congo, Lesotho and Zambia.

SELECTED PROJECTS INCLUDE:

Archaeological Impact Assessments (Phase 1)

Heritage Impact Assessment Proposed Discharge Of Treated Mine Water Via The Wonderfontein Spruit Receiving Water Body Specialist as part of team conducting an Archaeological Assessment for the Mmamabula mining project and power supply, Botswana

Archaeological Impact Assessment Mmamethlake Landfill

Archaeological Impact Assessment Libangeni Landfill

Linear Developments

Archaeological Impact Assessment Link Northern Waterline Project At The Suikerbosrand Nature Reserve Archaeological Impact Assessment Medupi – Spitskop Power Line, Archaeological Impact Assessment Nelspruit Road Development

Renewable Energy developments

Archaeological Impact Assessment Karoshoek Solar Project

Grave Relocation Projects

Relocation of graves and site monitoring at Chloorkop as well as permit application and liaison with local authorities and social processes with local stakeholders, Gauteng Province.

Relocation of the grave of Rifle Man Maritz as well as permit application and liaison with local authorities and social processes with local stakeholders, Ndumo, Kwa Zulu Natal.

Relocation of the Magolwane graves for the office of the premier, Kwa Zulu Natal

Relocation of the OSuthu Royal Graves office of the premier, Kwa Zulu Natal

Phase 2 Mitigation Projects

Field Director for the Archaeological Mitigation For Booysendal Platinum Mine, Steelpoort, Limpopo Province. Principle investigator Prof. T. Huffman

Monitoring of heritage sites affected by the ARUP Transnet Multipurpose Pipeline under directorship of Gavin Anderson.

Field Director for the Phase 2 mapping of a late Iron Age site located on the farm Kameelbult, Zeerust, North West Province. Under directorship of Prof T. Huffman.

Field Director for the Phase 2 surface sampling of Stone Age sites effected by the Medupi – Spitskop Power Line, Limpopo Province

Heritage management projects

Platreef Mitigation project – mitigation of heritage sites and compilation of conservation management plan.



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MEMBERSHIP OF PROFESSIONAL ASSOCIATIONS:

Association of Southern African Professional Archaeologists. Member number 159 Accreditation:

> Field Director Iron Age Archaeology

Colonial Period Archaeology, Stone Age Field Supervisor Archaeology and Grave Relocation

Accredited CRM Archaeologist with SAHRA

Accredited CRM Archaeologist with AMAFA

Co-opted council member for the CRM Section of the Association of Southern African Association Professional Archaeologists (2011 – 2012)

PUBLICATIONS AND PRESENTATIONS

- A Culture Historical Interpretation, Aimed at Site Visitors, of the Exposed Eastern Profile of K8 on the Southern terrace at Mapungubwe.
 - J van der Walt, A Meyer, WC Nienaber
 - Poster presented at Faculty day, Faculty of Medicine University of Pretoria 2003
- 'n Reddingsondersoek na Anglo-Boereoorlog-ammunisie, gevind by Ifafi, Noordwes-Provinsie. South-African Journal for Cultural History 16(1) June 2002, with A. van Vollenhoven as co-writer.
- Fieldwork Report: Mapungubwe Stabilization Project.
 - WC Nienaber, M Hutten, S Gaigher, J van der Walt
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2004
- A War Uncovered: Human Remains from Thabantšho Hill (South Africa), 10 May 1864.
 - M. Steyn, WS Boshoff, WC Nienaber, J van der Walt
 - Paper read at the 12th Congress of the Pan-African Archaeological Association for Prehistory and Related Studies 2005
- Field Report on the mitigation measures conducted on the farm Bokfontein, Brits, North West Province.
 - J van der Walt, P Birkholtz, W. Fourie
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2007
- Field report on the mitigation measures employed at Early Farmer sites threatened by development in the Greater Sekhukhune area, Limpopo Province. J van der Walt
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2008
- Ceramic analysis of an Early Iron Age Site with vitrified dung, Limpopo Province South Africa.
 - J van der Walt. Poster presented at SAFA, Frankfurt Germany 2008



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• Bantu Speaker Rock Engravings in the Schoemanskloof Valley, Lydenburg District, Mpumalanga (In Prep)

- J van der Walt and J.P Celliers
- Sterkspruit: Micro-layout of late Iron Age stone walling, Lydenburg, Mpumalanga. W. Fourie and J van der Walt. A Poster presented at the Southern African Association of Archaeologists Biennial Conference 2011
- Detailed mapping of LIA stone-walled settlements' in Lydenburg, Mpumalanga. J van der Walt and J.P Celliers
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2011
- Bantu-Speaker Rock engravings in the Schoemanskloof Valley, Lydenburg District, Mpumalanga. J.P Celliers and J van der Walt
 - Paper read at the Southern African Association of Archaeologists Biennial Conference 2011
- Pleistocene hominin land use on the western trans-Vaal Highveld ecoregion, South Africa, Jaco van der Walt.
 - J van der Walt. Poster presented at SAFA, Toulouse, France.
 Biennial Conference 2016

REFERENCES:

1. Prof Marlize Lombard Senior Lecturer, University of Johannesburg, South Africa

E-mail: mlombard@uj.ac.za

2. Prof TN Huffman Department of Archaeology Tel: (011) 717 6040

University of the Witwatersrand

3. Alex Schoeman University of the Witwatersrand

E-mail:Alex.Schoeman@wits.ac.za

