HERITAGE IMPACT ASSESSMENT

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

FOR THE PROPOSED KHUMANI IRON ORE MINE PROJECT, SISHEN, NORTHERN CAPE

Type of development:

Mine infrastructure development

Client:

Envirogistics

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Project Reference:
HCAC Project number 2170511
Report date:
May 2017

APPROVAL PAGE

Project Name	Khumani Mine	
Report Title	Heritage Impact Assessment Khumani Mine	
Authority Reference Number	TBC	
Report Status	Final Report	
Applicant Name	DRA Khumani	

	Name	Signature	Qualifications and Certifications	Date
Document Compilation	Jaco van der Walt	Walt.	MA Archaeology ASAPA #159	May 2017

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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 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 and 10
(I) Conditions for inclusion in the environmental authorisation	Section 9 and 10
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 9 and 10
(n) Reasoned opinion -	Section 10.2
(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	
(q) Any other information requested by the competent authority	Section 10



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Executive Summary

DRA Khumani appointed Envirogistics to conduct a Basic Assessment for a new Sorter Plant and the establishment of two new Silos/Magazines (King and Bruce Silos) at Khumani Mine, in the Northern Cape. HCAC was appointed to conduct a Heritage Impact Assessment of these three project components to determine the presence of cultural heritage sites and the impact of the proposed development on these non-renewable resources. The study areas were 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.

No archaeological sites or material of significance was recorded during the survey and an independent paleontological study has been commissioned. No further mitigation prior to construction is recommended in terms of the archaeological component 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 study area is surrounded by existing mining developments and infrastructure and the proposed development 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.

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Declaration of Independence

Specialist Name	Jaco van der Walt	
Declaration of Indonesians	Lideslave, an a presiglist appointed in terms of the National Environmental Management Act (Act	
Declaration of Independence Signature	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.	
Date	25/05/2017	

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 BG 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 Impact Assessment* EIA: Early Iron Age* EIA: Early Iron Age* EIA: Early Stone Age ESIA: Environmental Management Programme ESA: Early Stone Age ESIA: Environmental and Social Impact Assessment GIS Geographical Information System GRP Grave Relocation Plan HIA: Heritage Impact Assessment LIA: Late Iron 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
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ALIZAL A CIZ
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 infrastructure (plant and two silos) at the exisiting Khumani Mine. The report forms part of the Basic Assessment Report (BAR) and Environmental Management Programme Report (EMPR) for these additional activities at the existing Khumani Mine.

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 Regs 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 additional activities will be situated on the RE Portion
	of the Farm King 561, Portion 1 of the Farm Mokaning 260,
	RE Portion of the Farm Parson 564 and the RE of the
	Portion of the Farm Bruce 544 (Figure 1 and 2)
Magisterial District	Gamagara Local Municipality which forms part of the John
	Taolo Gaetsewe Districts Municipality
1: 50 000 map sheet number	2722DD
Central co-ordinate of the	Plant 27° 50' 56.9845" S, 23° 00' 10.0585" E
development	Bruce Silo 27° 48' 40.1111" S, 23° 01' 10.5022" E
	King Silo 27° 53' 12.2659" S, 23° 00' 17.2975" E

Table 3: Infrastructure and project activities

Type of development	Mining infrastructure developments		
Project size	Less than 5 hectares		
Project Components	It is the intention of the mine to initiate certain additional activities on site. These will include the establishment of a Low		
	Grade ROM (Run of Mine) Sorter Plant south west of the existing King		
	Plant, the decommissioning of the existing Magazines		
	and Silos on site, and the establishment of two new Silos/Magazines areas on site.		
	The first project: The mine intends to establish a new Low Grade ROM Sorter Plant to beneficiate the low grade ROM from		
	the Khumani Opencast Pit operations at the King Mine. The project will be developed in a phased approach. Phase 1 will involve the processing of		
	700tph ROM through a sorter plant. Phase 2 will be the doubling-up of Phase 1, with the addition of another 700tph ROM along with a second		
	sorter plant. During Phase 3, the -32mm size fraction will be processed.		
	The intention is to beneficiate a product which is currently not being		
	processed by the current plant at Khumani Iron Ore		
	The second project: The mine will decommission the existing silos at King		
	and Parson Mines. The purpose of the decommissioning is:		
	At King Mine, the Silos will be moved away from the mining infrastructure and encroaching mining activities. The new silos will be established on		
	the Mokaning farm, which forms part of the King Mining area. This area		
	will comprise of an Emulsion Silo [capacity of approximately 67 cubic		
	meters (89 tons)] and a second Silo, which will house ammonium nitrate		
	[approximately 65 cubic meters (52 tons)]. Two magazines will also be		
	established at this area with 200 cases at each magazine.		



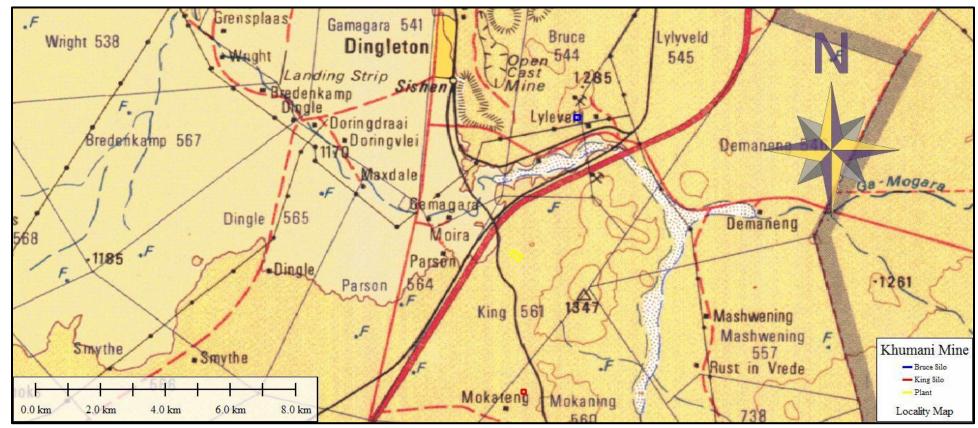


Figure 1. Provincial locality map (1: 250 000 topographical map)



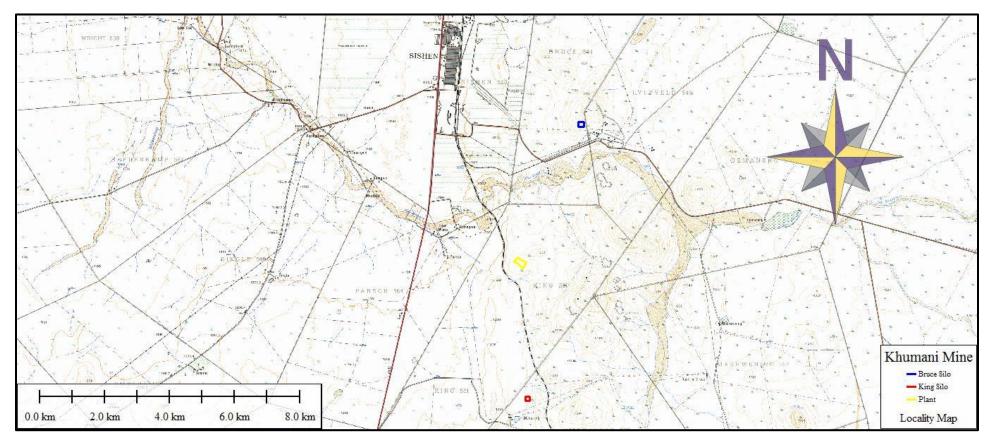


Figure 2: Regional locality map (1:50 000 topographical map).





Figure 3. Satellite image indicating Bruce Silo (Google Earth 2016).





Figure 4. Satellite image of the King Silo study area.





Figure 5. Satellite image indicating the plant area



HIA – Khumani Mine May 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.



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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	23 May 2017
Season	Early winter –vegetation in the study area is low with good archaeological visibility. The impact area was sufficiently covered (Figure 6 - 8) to adequately record the presence of heritage resources.





Figure 6: Track logs of the survey in black (Bruce Silo area)





Figure 7. Track logs of the survey in the King Silo area.





Figure 8. Track logs of the survey in the plant 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),</p>
- 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

The following information was obtained from an EIA conducted in 2015 by GCS:

"Population and Household

The population size (persons) for the Gamagara District Municipality increased by 25.47% over the 1995 to 2011 time period, whereas the John Taolo Gaetsewe District Municipality only grew by 12.49% over the same period. Households have also grown over the 1995 to 2011 time period, with the Gamagara Local Municipality showing a 30.36% increase and the John Taolo Gaetsewe District Municipality by 27.23%.

Age

It is important to assess the age distribution of persons in order to determine both the current and future needs of an area. Age is an important indicator as it relates to education, skills and dependency. A young population may require an improved educational system, whereas an older society may need an accented focus on healthcare. The largest percentage of people in the Gamagara Local Municipality, 71.9% fall within the working age category (16-64 years of age). 25.5% of the population are between the age of 0 and 14. And the elderly population forms 2.5% of the municipality's population. (Statistics South Africa, census 2011) Persons younger than 15 years of age do not form part of the Economically Active Population (EAP) of the area.

Education

The largest percentage (89,5%) of the Gamagara Local Municipality population has obtained some form of primary schooling. 24.9% of the population has attained matric and a further 3.6% with higher education.

Employment and Labour

The largest sector of employment in the Local Municipality is the mining sector, supplying just over a third of the jobs in the area. Followed by wholesale and retail trade jobs, which make up around 12% of the total employment. The main reason for this distribution are mines, like Sishen and Khumani in the area that are the largest employers in the municipality. The main average income of households in the Gamagara Local Municipality is between R9,601 and R307,600 as derived from the census 2011 data. It should however be noted that around 10% of the population in the municipality do not earn an income."



5 Description of the Physical Environment:

The plant area measures approximately 5 ha in size and is situated to the south of the existing King Mine operations. The site is relatively flat and covered with grass and bushes. The site is disturbed by mining related activities and the establishment of infrastructure like sewer pipes, roads and power lines (Figure 9 & 10).

Bruce Silo measures less than 1 hectare in size and is situated to the east of the existing Bruce Mine operations. The proposed site is relatively flat and located at the foot of a low ridge. The site is partially impacted on by what could have been exploration roads. The site is highly overgrown with *Senegalia erubescens* (Figure 11 & 12).

King Silo measures less than 1 hectare in size and is situated well to the south of the existing King Mine operations. The proposed site is relatively flat and located to the west of a low ridge. The site is characterised by Aeolian sand with sparse grass cover and a few low bushes (Figure 13 & 14).

The vegetation and landscape is described by Mucina and Rutherford (*The Vegetation of South Africa, Lesotho and Swaziland*, South African National Biodiversity Institute, Kirstenbosch, August 2006) as Kuruman Mountain Bushveld. The geological forms in the study area is described as Transvaal, Rooiberg and Griqualand-West





Figure 9. General Site conditions in the plant area.



Figure 10. General site conditions in the plant area.



Figure 11. General site conditions – Bruce Silo



Figure 12. General site conditions – Bruce silo





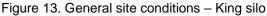




Figure 14. General site conditions – King silo.

6 Results of Public Consultation and Stakeholder Engagement:

6.1.1 Stakeholder Identification

The current Stakeholder Database on the mine was utilised as a basis for the development of the consultation register for this project. In addition, relevant government departments, municipalities and affected ward councillors were contacted to inform them of the proposed project and to obtain their issues and comments in this regard. The following stakeholders were consulted as part of the project:

- DWS;
- DMR;
- NCDENC;
- Local Municipality;
- Districts Municipality;
- Ward Councillor;
- Surrounding Landowners; and
- Other Identified Stakeholders.

6.1.2 Notification

Stakeholders were notified by means of the following systems:

- Notices
- Background Information Documents (BIDs); and
- Advertisements.

Proof of email submissions can be requested from the EAP.



6.1.3 Site Notices

In order to inform surrounding communities and adjacent landowners of the proposed project, five (5) site notices were erected on site (on 8 May 2017) and at visible locations close to the site.

Site Notices were place at the following locations:

- King Mine Entrance;
- Bruce Mine Entrance:
- Parson Silo Entrance;
- Kathu Municipality; and
- Olifantshoek Municipality.

6.1.4 Background Information Documents

Background Information Documents were distributed via email to all parties on the database on 12 May 2017.

6.1.5 Advertisements

The formal announcement of the proposed project was undertaken by placing an advertisement in the Kathu Gazette on 13 May 2017 to invite all Interested and Affected (I&APs) to register. The advertisements were published in both Afrikaans and English. The objective of this newspaper advertisement was to:

Inform I&APs of the proposed project;

Inform I&APs of the Environmental Impact Assessment procedure and the way in which I&APs could lodge any objections to the proposed development and provide comments; and

Invite I&APs to become involved in the proposed project by registering as I&APs.

6.1.6 Document Review

All registered stakeholders were informed of the availability of the draft BAR for the opportunity to review this document. No comments outside of those presented in the draft reports were received.



7 Literature / Background Study:

7.1 Literature Review

The following reports were conducted in the immediate vicinity of the study area and were consulted for this report:

Author	Year	Project	Findings
Kruger, N.	2015	Sishen Iron Ore Company (SIOC): Proposed Lyleveld North Waste Rock Dump Expansion and Lyleveld South Haul Road Extension Project, Sishen Mine, Northern Cape Province	2 Stone Age occurrences and 1 site attributed to mechanical weathering.
Morris, D.	2005	Archaeological Impact assessment of mining areas on the farms Bruce, King, Mokaning and Parson between Postmasburg and Kathu in the Northern Cape.	Age artefacts were
Beaumont, P.	2005	Heritage Assessment for an EMPR amendment relating to a proposed crusher at Sishen Iron Ore Mine near Kathu in the Northern Cape province.	No sites were identified.

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.

7.3. 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 2011). 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.

The larger study area has a wealth of pre-colonial archaeological sites (Morris & Beaumont 2004). Famous sites in the region include the world renowned Wonderwerk Cave to the north of the study area. Closer to Kuruman two shelters on the northern and southern faces of GaMohaan (in the Kuruman Hills north west of the town) contain Later Stone Age remains and rock paintings. Rock art is known to occur at Danielskuil to the north east and on Carter Block (Morris 2008). Middle Stone Age material is on record around the study area.

Archaeological surveys have shown rocky outcrops and hills, drainage lines, riverbanks and confluences to be prime localities for archaeological finds and specifically Stone Age sites, as these areas where utilized for settlement of base camps close to water and hunting ranges.



7.4. Iron Age

Iron Age expansion southwards past Kuruman into the Ghaap plato and towards Postmasburg dates to the 1600's (Humphreys, 1976 and Thackeray, 1983). Definite dates for Tswana presence in the Postmasburg area are around 1805 when Lichtenstein visited the area and noted the mining activities of the Tswana (probably the Thlaping) tribes in the area. The Thlaro and Thlaping settled the area from Campbell in the east to Postmasburg and towards the Langeberg close to Olifantshoek in the north west before 1770 (Snyman, 1988). The Korana expansion after 1770 started to drive the Thlaro and Thlaping further north towards Kuruman (Shillington, 1985).

7.4.1. Anglo-Boer War

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

7.4.2. Cultural Landscape

The Khumani mine was constructed from October 2006 (http://www.assmang.co.za/content.asp?pg=7), prior to this the area was undeveloped and characterised by sparse vegetation. The surrounding area have been characterised by intensive mining activities.



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3. Findings of the Survey

It is important to note that only the development footprint of each project was surveyed. The study area was surveyed over a period of 1 day in the company of mine officials. The proposed plant area is situated to the south and adjacent to the existing King Mine operations. The site is relatively flat and covered with grass and bushes. The site is disturbed by mining related activities and the establishment of infrastructure like sewer pipes, roads and power lines that would have impacted on any surface indications of heritage sites.

Bruce Silo is situated to the east of the existing Bruce Mine operations. The proposed site is relatively flat and located at the foot of a low ridge. The site is partially impacted on by what could have been exploration roads and is highly overgrown with *Senegalia erubescens*. King Silo is situated well to the south of the existing King Mine operations in a green field's area. The proposed site is relatively flat and located to the west of a low ridge. The site is characterised by Aeolian sand with sparse grass cover and a few low bushes with no raw material suitable for knapping.

In terms of the national estate as defined by the NHRA no sites of significance were found during the survey as described below.



8.3. Built Environment (Section 34 of the NHRA)

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

8.4. Archaeological and palaeontological resources (Section 35 of the NHRA)

No archaeological sites or material was recorded during the survey. 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. According to the SAHRIS palaeontological sensitivity map the study area is of palaeontological sensitivity and a Paleontological study was commissioned for the study area.

8.5. Burial Grounds and Graves (Section 36 of the NHRA)

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

8.6. Cultural Landscapes, Intangible and Living Heritage.

Long term impact on the cultural landscape is considered to be negligible as the surrounding area consists of an area that has been subjected to extensive mining activities from 2006 onwards. Visual impacts to scenic routes and sense of place are also considered to be low due to the extensive developments in the area.

8.7. Battlefields and Concentration Camps

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



8.8. 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 very 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 mining activities minimises additional impact on the landscape.

8.8.1. 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.

8.8.2. 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.

8.8.3. Operation Phase:

No impact is envisaged for the recorded heritage resources 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	No resources were recorded No resources were reco	
resources?		
Can impacts be	Yes, a chance find procedure	Yes
mitigated?	should be implemented.	
A4141 41	·	

Mitigation:

Due to the lack of apparent significant archaeological resources no further mitigation is required prior to construction.

Cumulative impacts:

A Chance Find Procedure should be implemented for the project should any sites be identified during the construction process.



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.

9. Conclusion and recommendations

HCAC was appointed to conduct a Heritage Impact Assessment for a new Sorter Plant and the establishment of two new Silos/Magazines (King and Bruce Silos) at Khumani Mine, close to Sishen in the Northern Cape. The proposed plant area is situated to the south and adjacent to the existing King Mine operations. The site is relatively flat and covered with grass and bushes. The site is disturbed by mining related activities and the establishment of infrastructure like sewer pipes, roads and power lines that would have impacted on any surface indications of heritage sites. Bruce Silo is situated to the east of the existing Bruce Mine operations. The proposed site is relatively flat and located at the foot of a low ridge. The site is partially impacted on by what could have been exploration roads and is highly overgrown. King Silo is situated well to the south of the existing King Mine operations in a green field's area. The proposed site is relatively flat and located to the west of a low ridge. The site is characterised by Aeolian sand with sparse grass cover and a few low bushes with no raw material suitable for knapping.

During the survey, no archaeological sites or material was recorded. Therefore, no further mitigation prior to construction is recommended in terms of the archaeological component of Section 35 for the proposed development to proceed. According to the SAHRIS palaeontological sensitivity map the study area is of palaeontological sensitivity and a Paleontological study was commissioned for the study area.

In terms of the built environment of the area (Section 34), no standing structures older than 60 years occur within the study area. 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 study area is surrounded by mining developments and infrastructure and the proposed development 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 are implemented as part of the EMPr and based on approval from SAHRA

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.



10. References

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11. Appendices:

Curriculum Vitae of Specialist

Jaco van der Walt Archaeologist

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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.



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.



MEMBERSHIP OF PROFESSIONAL ASSOCIATIONS:

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

Field Director
 Iron Age Archaeology

 Field Supervisor Colonial Period Archaeology, Stone Age 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



- 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, Jacovan 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

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University of the Witwatersrand

3. Alex Schoeman University of the Witwatersrand

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