

Agency for Cultural Resource Management

Specialists in Archaeological Studies and Heritage Resource Management

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15 February, 2013

Att: Mr Andrew Salomon
Archaeological Heritage Impact Assessor
South African Heritage Resources Agency
237 Lynnwood Road
Brooklyn
Pretoria

Dear Mr Salomon,

RECOMMENDED EXEMPTION FROM HAVING TO CONDUCT AN ARCHAEOLOGICAL IMPACT STUDY: THE PROPOSED IMPALA PLATINUM PRECIOUS METALS REFINERY EXPANSION PROJECT IN SPRINGS, GAUTENG PROVINCE

1. Introduction

Your email to Mr Mark Woods, of Mark Woods Consultants, dated 30 July 2012, refers.

The proposed development entails the expansion of the existing Impala Platinum Refinery in Springs in Gauteng Province (Figures 1 & 2).

A previous application to expand the facility was supported by stakeholders during a public participation process in 2006 and 2007.

However, the proposed revised plan now entails changes to the location of the main buildings. In addition, new packing and dispatch buildings are also envisaged, including a new ablution block, construction and contractors yards, security and control rooms, and a new substation. Parking facilities and security layout will also be revised (Figure 3). The revised plan also entails moving to a new location in the precious metal refinery. All proposed activities will, however, take place within the footprint area of the existing facility.

2. Description of the receiving environment.

The Impala Platinum Refinery has been in existence since the early 1960s (Mark Wood pers. comm.). There is an old (decommissioned) mine shaft north of the existing mine dump. The receiving environment constitutes a severely disturbed and transformed industrial landscape. Most of the housing units in East Geduld was built by the mines in the 1960s (refer to Figure 2), and was owned by Implats before they sold the houses to their employees. Surrounding land use comprises residential suburbs, slimes dam, waste water treatment works, dams and limited agriculture.

3. Archaeological potential

According to Gavin Whitelaw (email correspondence dated 15 February, 2013), who is an authority on the Southern African Iron Age, the probability of locating any significant surface archaeological heritage within the footprint area of the existing facility is likely to be very low. There is however, according to Whitelaw, a 'possibility' of sub surface heritage, such as unmarked human remains and pits, being encountered during bulk earthworks and preparation of the site for development.

4. Conclusion

It is the archaeologist's professional opinion, that the proposed expansion of the Impala Platinum Precious Metals Refinery in Springs is not considered to pose a serious threat to the archaeological heritage for the following reasons:

- Indications are that the receiving environment is not a sensitive archaeological landscape, and is in fact a severely degraded industrial landscape.

5. Recommendations

With regard to the proposed Impala Platinum Precious Metal Refinery Expansion Project in Springs, the following recommendations are made:

1. No archaeological mitigation is required.
2. In the unlikely event of any unmarked human burials, buried pits or potsherds being uncovered during earthworks, these must immediately be reported to the South African Heritage Resources Agency (Mr Andrew Salomon 012 362 2535).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jonathan Kaplan', with a stylized, cursive script.

Jonathan Kaplan

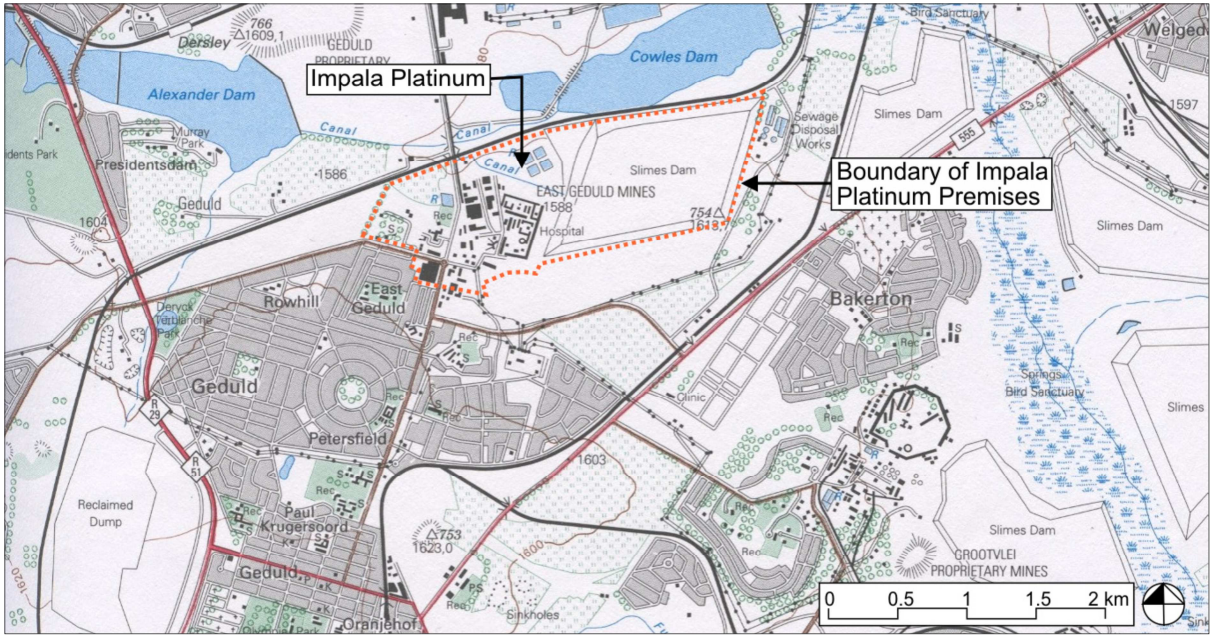


Figure 1. Locality map

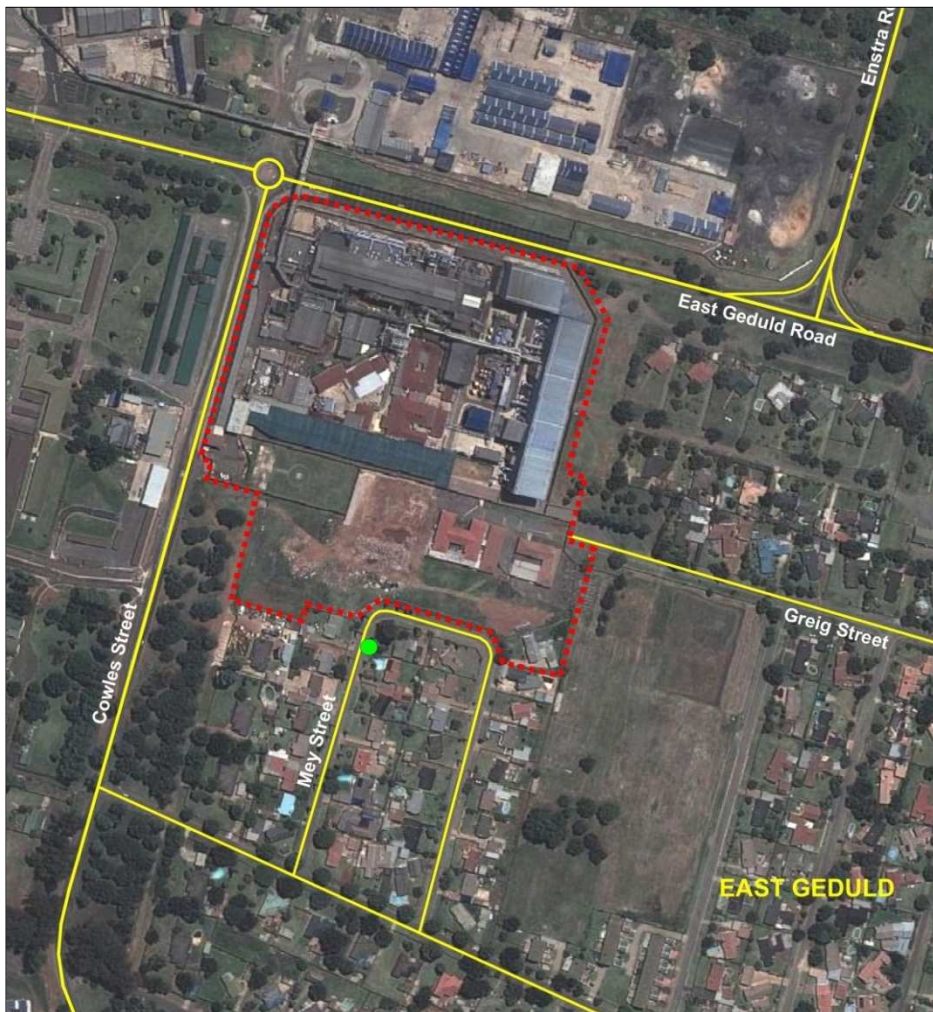


Figure 2. Google aerial photograph illustrating the existing Impala Platinum facility

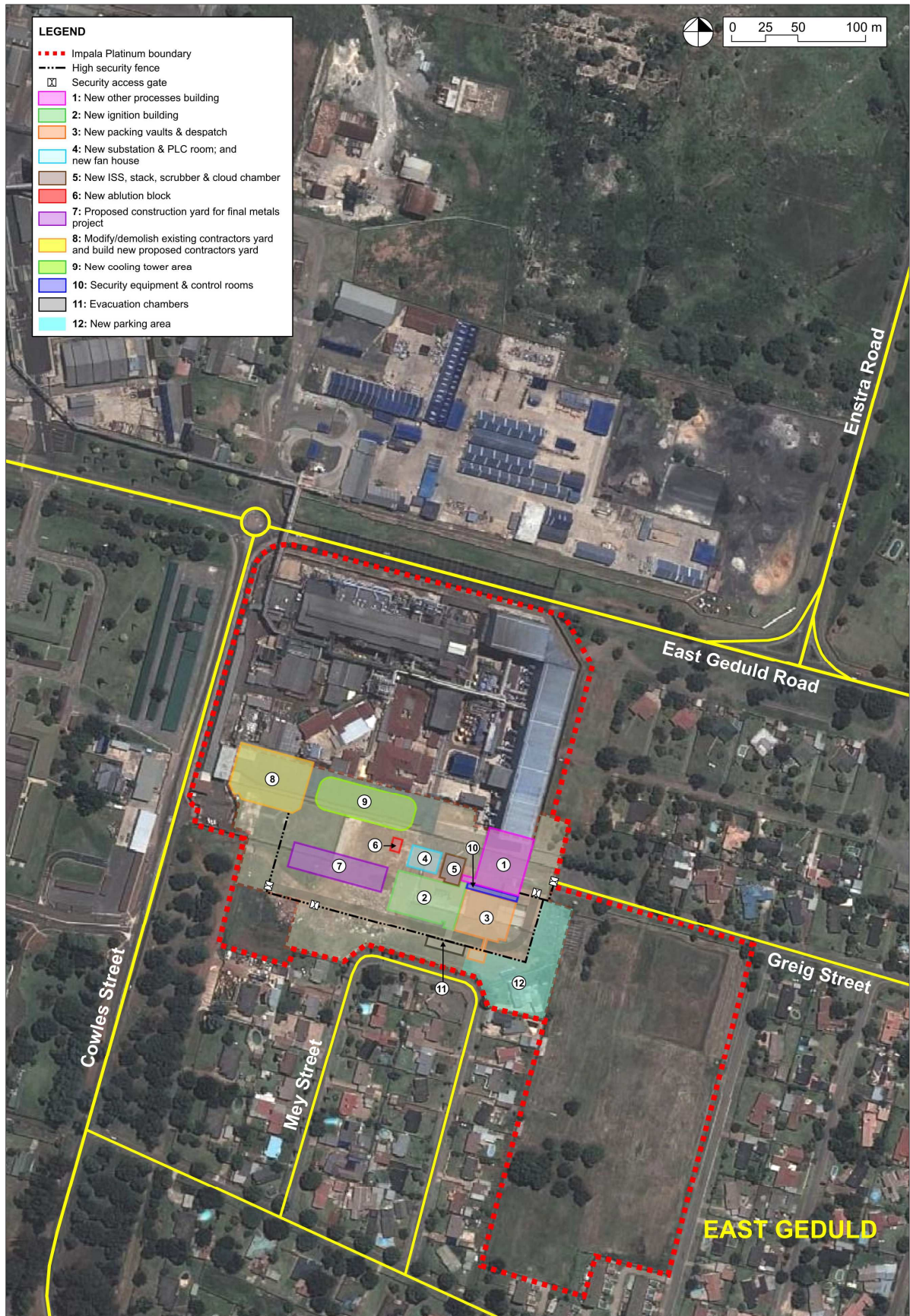


Figure 3. The existing facility indicating the proposed revised expansion plan