Heritage Assessment

HERITAGE UNIT

Lime-Chem Mining on portions of Portion 6, 17 and 26 of the farm Scherp Arabie 743 KS, District Marble Hall, Limpopo

Version 1.0

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The Client, on acceptance of any submission by PGS and on condition that the Client pays to Professional Grave Solutions (Pty) Ltd the full price for the work as agreed, shall be entitled to use for its own benefit and for the specified project only:

i. The results of the project;
ii. The technology described in any report ; and,
iii. The recommendations delivered to the Client.

EXECUTIVE SUMMARY

Professional Grave Solutions Heritage Unit was appointed by Digby Wells & Associates (Pty) Ltd to undertake an Archaeological Impact Assessment that forms part of the Environmental Management Plan for the Lime-Chem mine on portions of Portion 6, 17 and 26 of the farm Scherp Arabie 743 KS, District Marble Hall, Limpopo.

During the survey one site of heritage significance was found.

Site 1

The site consist of approximately 50 unmarked graves aligned east-west.

- A buffer of 20 metres must be left between the mining activities and the graves. It must however be considered that mining can impact on the site and in such a case the graves must be relocated.

- In the event of the relocation of the graves are considered it must be taken into account that the graves are protected under the NHRA Section 36, and will require an approved grave relocation process.

- This process must include:
    - Social consultation, with a concerted effort to located the families of the graves;
    - Advertisements on site, local newspapers and radio notices;
    - Application for permits to exhume the graves that include Local Government, Provincial Health Departments and the South African Heritage Resources Agency.
    - The exhumation must be done by a company with a proven track record of handling exhumations in a respectful and skilled manner.

If this issue has been mitigated, there will be from a Heritage point of view no reason why the development can not commence.

General

If during mining any possible finds are made, the operations must be stopped and a qualified archaeologist be contacted for an assessment of the find.

CONTENTS

ANNEXURE

Figures

1. INTRODUCTION

Professional Grave Solutions Heritage Unit was appointed by Digby Wells & Associates (Pty) Ltd to undertake an Archaeological Impact Assessment that forms part of the Environmental Management Plan for the Lime-Chem mine on portions of Portion 6, 17 and 26 of the farm Scherp Arabie 743 KS, District Marble Hall, Limpopo.

The aim of the study is to identify all heritage sites, document, and assess their importance within Local, Provincial and national context. From this we aim to assist the developer in managing the discovered heritage resources in a responsible manner, in order to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999).

The report outlines the approach and methodology utilised before and during the survey, which includes in Phase 1: Information collection from various sources and public consultations; Phase 2: Physical surveying of the area on foot and by vehicle; and Phase 3: Reporting the outcome of the study.

During the survey, one cultural heritage site was identified.

General site conditions and features on site were recorded by means of photos, GPS location, and description. Possible impacts were identified and mitigation measures are proposed in the following report.

This report must also be submitted to SAHRA provincial office for scrutiny.

2. APPROACH AND METHODOLOGY

The aim of the study is to extensively cover all data available to compile a background history of the study area; this was accomplished by means of the following phases.

2.1. PROJECT DESCRIPTION

Lime-Chem's limestone mine is located approximately 2 km from Marble Hall in the Limpopo Province. The mine commenced in the early seventies and Lime-Chem purchased the quarry in 1985 as Lime-Chem CC and converted to Lime-Chem (Pty) Ltd in 1996. The property occurs on Portion 2 of the farm Scherp Arabie 743 KS and the 35 ha surface rights are held by Lime-Chem. The mine has an existing Environmental Management Program Report (EMPR) which was submitted in 1993 and is now applying

for a mineral right conversion to new order rights to comply with the Minerals and Petroleum Resource Development Act (MPRDA, Act 28 of 2002). The Lime-Chem quarry is an existing opencast mine with no expansion expected in the immediate future. Infrastructure is concentrated on the southern portions of the property near to the dirt road, with fewer disturbances in the northern portions of the property. Limestone is mined in the form of calcite from a quarry pit and processed at one of two crusher plants on site. Limestone is temporarily stored on site and trucked from site to various local markets, predominantly metallurgical.

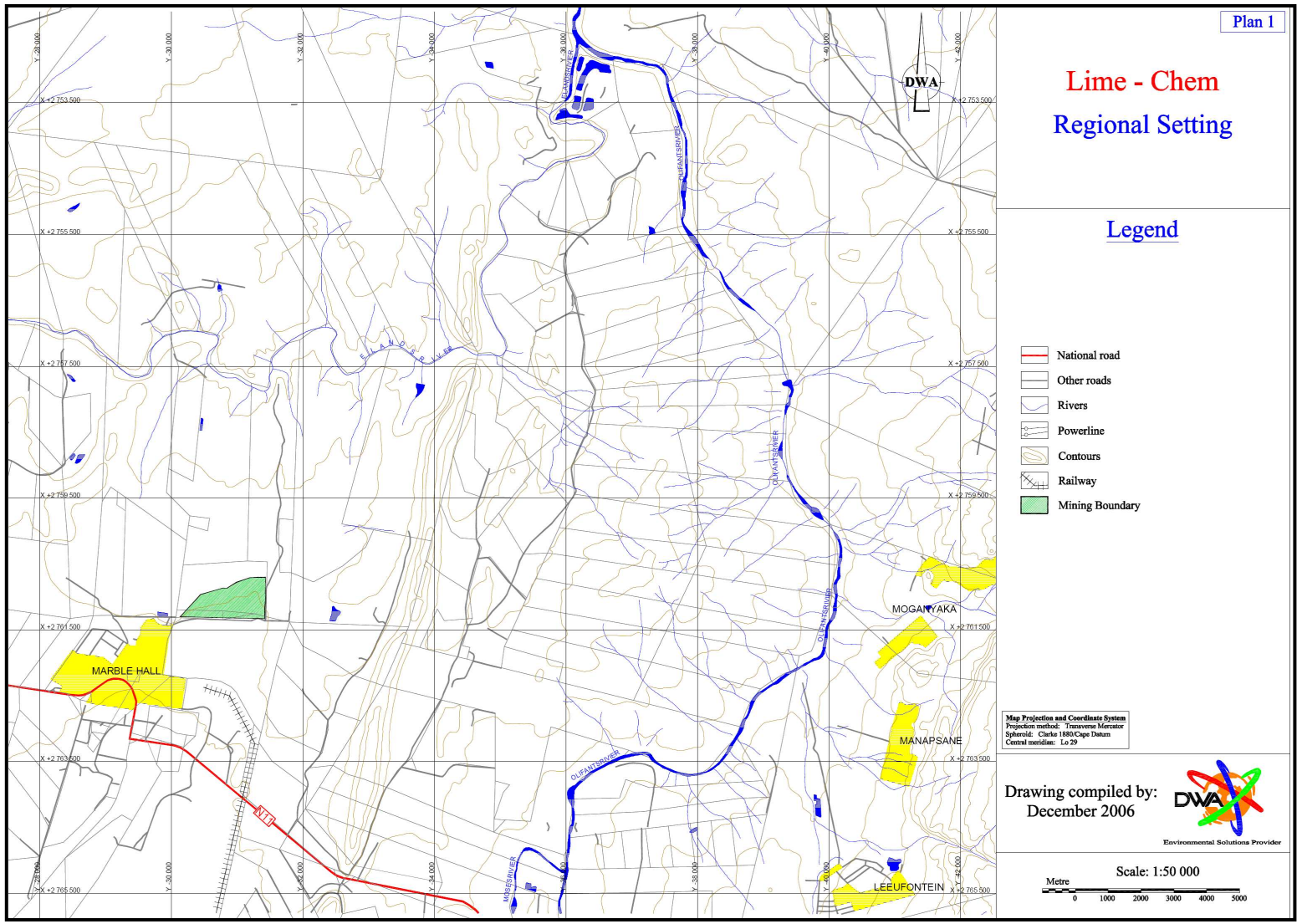

Figure 1 – Locality Map

2.2 PHYSICAL SURVEYING

Due to the nature of cultural remains, the majority that occur below surface, a physical walk through of the study area was conducted. The total area of impact comprised an area of approximately 250 ha in total. The study area was surveyed over two days, by means of vehicle and extensive surveys on foot by PGS.

Aerial photographs and 1:50 000 maps of the area were consulted and literature of the area were studied before undertaking the survey. The purpose of this was to identify topographical areas of possible historic and pre-historic activity. All sites discovered both inside and bordering the proposed development area was plotted on 1:50 000 maps and their GPS co-ordinates noted. 35mm photographs on digital film were taken at all the sites.

3. LEGISLATIVE REQUIREMENTS AND TERMINOLOGY

3.1 Legislation

The identification, evaluation and assessment of any cultural heritage site, artefact or find in the South African context is required and governed by the following legislation:

i. National Environmental Management Act (NEMA) Act 107 of 1998
ii. National Heritage Resources Act (NHRA) Act 25 of 1999
iii. Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
iv. Development Facilitation Act (DFA) Act 67 of 1995

The following sections in each Act refer directly to the identification, evaluation and assessment of cultural heritage resources.

i. National Environmental Management Act (NEMA) Act 107 of 1998
    a. Basic Environmental Assessment (BEA) – Section (23)(2)(d)
    b. Environmental Scoping Report (ESR) – Section (29)(1)(d)
    c. Environmental Impacts Assessment (EIA) – Section (32)(2)(d)
    d. Environmental Management Plan (EMP) – Section (34)(b)
ii. National Heritage Resources Act (NHRA) Act 25 of 1999
    a. Protection of Heritage resources – Sections 34 to 36; and
    b. Heritage Resources Management – Section 38
iii. Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
    a. Section 39(3)

iv. Development Facilitation Act (DFA) Act 67 of 1995
    a. The GNR.1 of 7 January 2000: Regulations and rules in terms of the Development Facilitation Act, 1995. Section 31.

3.2 Terminology

ASAPA: Association of South African Professional Archaeologists
CRM: Cultural Resource Management
DEAT: Department of Environmental Affairs and Tourism
DWAF: Department of Water Affairs and Forestry
EIA practitioner: Environmental Impact Assessment Practitioner
EIA: Environmental Impact Assessment
EIA: Early Iron Age
ESA: Early Stone Age
GPS: Global Positioning System
HIA: Heritage Impact Assessment
I&AP: Interested & Affected Party
LSA: Late Stone Age
LIA: Late Iron Age
MSA: Middle Stone Age
MIA: Middle Iron Age
NEMA: National Environmental Management Act
NHRA: National Heritage Resources Act
PHRA: Provincial Heritage Resources Agency
PSSA: Palaeontological Society of South Africa
ROD: Record of Decision
SAHRA: South African Heritage Resources Agency

Archaeological resources

This includes:

i. material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years including artefacts, human and hominid remains and artificial features and structures;
ii. rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
iii. wrecks, being any vessel or aircraft, or any part thereof which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in

the maritime culture zone of the republic as defined in the Maritimes Zones Act, and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation;

iv. features, structures and artefacts associated with military history which are older than 75 years and the site on which they are found.

Cultural significance

This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance

Development

This means any physical intervention, excavation, or action, other than those caused by natural forces, which may in the opinion of the heritage authority in any way result in the change to the nature, appearance or physical nature of a place or influence its stability and future well-being, including:

i. construction, alteration, demolition, removal or change in use of a place or a structure at a place;
ii. carrying out any works on or over or under a place;
iii. subdivision or consolidation of land comprising a place, including the structures or airspace of a place;
iv. constructing or putting up for display signs or boards;
any change to the natural or existing condition or topography of land;
v. any removal or destruction of trees, or removal of vegetation or topsoil

Heritage resources

This means any place or object of cultural significance

4. ASSESSMENT CRITERIA

This chapter describes the evaluation criteria used for the sites listed below.

The significance of archaeological sites was based on four main criteria:

- **site integrity** (i.e. primary vs. secondary context),
- **amount of deposit, range of features** (e.g., stonewalling, stone tools and enclosures),
- **uniqueness** and
- **potential** to answer present research questions.

Management actions and recommended mitigation, which will result in a reduction in the impact on the sites, will be expressed as follows:

A - No further action necessary;

B - Mapping of the site and controlled sampling required;
C - Preserve site, or extensive data collection and mapping of the site; and
D - Preserve site

Impacts on these sites by the development will be evaluated as follows

4.1 IMPACT

The potential environmental impacts that may result from the proposed development activities.

4.1.1 Nature and existing mitigation

Natural conditions and conditions inherent in the project design that alleviate (control, moderate, curb) impacts. All management actions, which are presently implemented, are considered part of the project design and therefore mitigate against impacts.

4.2 EVALUATION

4.2.1 Site Significance

Site significance classification standards prescribed by the South African Heritage Resources Agency (2006) and approved by the Association for Southern African Professional Archaeologists (ASAPA) for the Southern African Development Community (SADC) region, were used for the purpose 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

4.2.2 Impact Rating

VERY HIGH

These impacts would be considered by society as constituting a major and usually permanent change to the (natural and/or social) environment, and usually result in **severe** or **very severe** effects, or **beneficial** or **very beneficial** effects.

Example: The loss of a species would be viewed by informed society as being of VERY HIGH significance.

Example: The establishment of a large amount of infrastructure in a rural area, which previously had very few services, would be regarded by the affected parties as resulting in benefits with a VERY HIGH significance.

HIGH

These impacts will usually result in long term effects on the social and/or natural environment. Impacts rated as HIGH will need to be considered by society as constituting an important and usually long term change to the (natural and/or social) environment. Society would probably view these impacts in a serious light.

Example: The loss of a diverse vegetation type, which is fairly common elsewhere, would have a significance rating of HIGH over the long term, as the area could be rehabilitated.

Example: The change to soil conditions will impact the natural system, and the impact on affected parties (in this case people growing crops on the soil) would be HIGH.

MODERATE

These impacts will usually result in medium- to long-term effects on the social and/or natural environment. Impacts rated as MODERATE will need to be considered by society as constituting a fairly important and usually medium term change to the (natural and/or social) environment. These impacts are real but not substantial.

Example: The loss of a sparse, open vegetation type of low diversity may be regarded as MODERATELY significant.

Example: The provision of a clinic in a rural area would result in a benefit of MODERATE significance.

LOW

These impacts will usually result in medium to short term effects on the social and/or natural environment. Impacts rated as LOW will need to be considered by the public

and/or the specialist as constituting a fairly unimportant and usually short term change to the (natural and/or social) environment. These impacts are not substantial and are likely to have little real effect.

Example: The temporary change in the water table of a wetland habitat, as these systems are adapted to fluctuating water levels.

Example: The increased earning potential of people employed as a result of a development would only result in benefits of LOW significance to people who live some distance away.

NO SIGNIFICANCE

There are no primary or secondary effects at all that are important to scientists or the public.

Example: A change to the geology of a particular formation may be regarded as severe from a geological perspective, but is of NO significance in the overall context.

4.2.3 Certainty

DEFINITE: More than 90% sure of a particular fact. Substantial supportive data exist to verify the assessment.

PROBABLE: Over 70% sure of a particular fact, or of the likelihood of impact occurring.

POSSIBLE: Only over 40% sure of a particular fact or of the likelihood of an impact occurring.

UNSURE: Less than 40% sure of a particular fact or likelihood of an impact occurring.

4.2.4 Duration

SHORT TERM: 0 to 5 years

MEDIUM: 6 to 20 years

LONG TERM: more than 20 years

DEMOLISHED: site will be demolished or is already demolished

Example

Evaluation

Impact	Impact Significance	Heritage Significance	Certainty	Duration	Mitigation
Negative	Moderate	Grade GP.B	Possible	Short term	B

5. HISTORICAL BACKGROUND OF AREA

5.1 ARCHAEOLOGICAL BACKGROUND

The Stone Age is divided in Earlier; Middle and Later Stone Age and refers to the earliest people of South Africa who mainly relied on stone for their tools.

Earlier Stone Age: The period from ± 2.5 million yrs - ± 250 000 yrs ago. Acheulean stone tools are dominant.

Middle Stone Age: Various lithic industries in SA dating from ± 250 000 yrs – 22 000 yrs before present.

Later Stone Age: The period from ± 22 000-yrs before present to the period of contact with either Iron Age farmers or European colonists.

The Iron Age as a whole represents the spread of Bantu speaking people and includes both the Pre-Historic and Historic periods. Similar to the Stone Age it to can be divided into three 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 Wits ARM database indicates no known archaeological sites in the area.

5.2 HISTORICAL BACKGROUND

In 1914, Mr. Stoffel Visagie and his wife Maria, discovered the marble deposits at what is today Marble Hall, while on a hunting trip from Pretoria to the Bushveld. Mr. Visagie took some English speaking people to the site because they wanted to see the "Marble Hole".

Mr. Visagie's English was not very good and he spoke of "Marble Hol" instead of "Marble Hole". This became "Marble Hall" - although there had originally been no mention of a "hall".

The farm Marble Hall was proclaimed as public diggings in 1916.

Italian prisoners of war used white marble from Marble Hall to construct the laager wall at the Voortrekker Monument during late 1945 to 49 (Blumberg).

In 1919 a geological survey by T G Trevor, a mining inspector, was published, dealing with marble deposits on the farms Marble Hall and Scherp Arabic, in the Transvaal. The report concludes with the observation that the deposits at Marble Hall were a great national asset and a future source of wealth for the government. (Supreme Court, 1998).

6. SITES OF SIGNIFICANCE

The study area, located on topographical sheet 2429CD. The proposed site is approximately 250ha in size. The area of concern falls within the mixed bushveld and is a component of the savanna biome. Within the mining boundary lack of fires and grazing appears to be decreasing the grass sword and benefiting the encroachment of woody species. Bush encroachment was more evident in some of the more disturbed areas within the mining boundary.

Figure 2: General photo of study area

The following sites were found in the area.

6.1 SITE 1

Description of Site: ***Site Number***	Site 1		
Map reference	***Topo-sheet number***	***Number of Map in report***	
	2429CD	***Annexure A***	
GPS coordinates: *Indicate Model and datum - WGS 84*	X	Y	
Garmin 60Csx, WGS 84	S24 57 22.7	E29 18 39	
Site Data	***Description***		
Type of site *(e.g. open scatter; shell midden, cave /shelter);*	The site consists of approximately 50 graves aligned in two rows north south. All the graves are individually aligned east-west. None have headstones with inscriptions on. All excluding one is stone packed.		
Site categories *(e.g. Earlier Stone Age, Late Iron Age);*	Recent Historic		
Context *(i.e. primary or secondary);*	Primary		
Cultural affinities, approximate age and significant features of the site;	None		
Estimation or measurement of the extent *(maximum dimensions) and orientation of the site(s);*	50x20m		
Depth and stratification of the site *(where shovel test permits have been given), both in the text and through photographs of the sections;*	None visible		
Possible sources of information about past environments, such as stalactites/ stalagmites, flowstone, dassie middens, peat or organic rich deposits.	None		

Photographs and diagrams *(Figure numbers)*

Figure 3: Photo of cemetery

Figure 4: Photo of grave

Statement of Significance *(Heritage Value)*	The site is of high significance.				
Field Rating *(Recommended grading or field significance)* of the site:	Generally protected (GP.A)				
Impact Evaluation *of development on site*	Impact on site is seen as high negative, through possible destruction of site during mining activities.				
Recommendations *including:*	The cemetery falls within the mining area. It is recommended that a buffer of 20 metres must be kept between any mining activities and the cemetery. It must however be considered that open cast mining can be extended at a later stage and impact on the site and in such a case the graves must be relocated**.** In the event of the relocation of the graves are considered it must be taken into account that the graves are protected under the NHRA Section 36, and will require an approved grave relocation process.				
Summary					
Field Rating	**Impact**	**Impact Significance**	**Certainty**	**Duration**	**Mitigation**
Grade GP.A	Negative	High	Possible	Long term	B

7. ASSUMPTIONS AND LIMITATIONS

Not subtracting in any way from the comprehensiveness of the fieldwork undertaken, it is necessary to realise that the heritage resources located during the fieldwork do not necessarily represent all the heritage resources located there. This may be due to various reasons, including the subterranean nature of some archaeological sites and dense vegetation cover. As such, should any heritage features and/or objects not included in the present inventory be located or observed, a heritage specialist must immediately be contacted. Such observed or located heritage features and/or objects may not be disturbed or removed in any way until such time that the heritage specialist has been able to make an assessment as to the significance of the site (or material) in question. This is true for graves and cemeteries as well.

8. LEGAL AND POLICY REQUIREMENTS

8.1 General principles

In areas where there has not yet been a systematic survey to identify conservation worthy places, a permit is required to alter or demolish any structure older than 60 years. This will apply until a survey has been done and identified heritage resources are formally protected.

Archaeological and palaeontological sites, materials, and meteorites are the source of our understanding of the evolution of the earth, life on earth and the history of people. In the new legislation, permits are required to damage, destroy, alter, or disturb them. People who already possess material are required to register it.

The management of heritage resources are integrated with environmental resources and this means that before development takes place heritage resources are assessed and, if necessary, rescued.

In addition to the formal protection of culturally significant graves, all graves, which are older than 60 years and are not in a cemetery (such as ancestral graves in rural areas), are protected. The legislation protects the interests of communities that have interest in the graves: they may be consulted before any disturbance takes place.

The graves of victims of conflict and those associated with the liberation struggle will be identified, cared for, protected and memorials erected in their honour.

Anyone who intends to undertake a development must notify the heritage resource authority and if there is reason to believe that heritage resources will be affected, an impact assessment report must be compiled at the developer's cost. Thus developers will be able to proceed without uncertainty about whether work will have to be stopped if a heritage resource is discovered.

According to the National Heritage Act (Act 25 of 1999 section 32) it is stated that:

An object or collection of objects, or a type of object or a list of objects, whether specific or generic, that is part of the national estate and the export of which SAHRA deems it necessary to control, may be declared a heritage object, including –

- objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects, meteorites and rare geological specimens;
- visual art objects;
- military objects;
- numismatic objects;
- objects of cultural and historical significance;
- objects to which oral traditions are attached and which are associated with living heritage;

- objects of scientific or technological interest;
- books, records, documents, photographic positives and negatives, graphic material, film or video or sound recordings, excluding those that are public records as defined in section 1 (xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996), or in a provincial law pertaining to records or archives; and
- any other prescribed category.

Under the National Heritage Resources Act (Act No. 25 of 1999), provisions are made that deal with, and offer protection, to all historic and pre-historic cultural remains, including graves and human remains.

8.1 Graves and cemeteries

Graves younger than 60 years fall 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 reinterment 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. In order 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).

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 the South African Heritage Resource Agency (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 the category located inside a formal cemetery administrated by a local authority will also require the same authorisation as set out for graves younger than 60 years over and above 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.

9. ASSESSMENT AND RECOMMENDATIONS

*A locality map is provided in **Annexure A***

During the survey six sites were found of which one has higher heritage significance value

Site 1

The site consist of 50 unmarked graves aligned east-west.

- A buffer of 20 metres must be left between the mining activities and the graves. It must however be considered that mining can impact on the site and in such a case the graves must be relocated.

- In the event of the relocation of the graves are considered it must be taken into account that the graves are protected under the NHRA Section 36, and will require an approved grave relocation process.

- This process must include:
    - Social consultation, with a concerted effort to located the families of the graves;
    - Advertisements on site, local newspapers and radio notices;
    - Application for permits to exhume the graves that include Local Government, Provincial Health Departments and the South African Heritage Resources Agency.
    - The exhumation must be done by a company with a proven track record of handling exhumations in a respectful and skilled manner.

If this issue has been mitigated, there will be from a Heritage point of view no reason why the development can not commence.

General

If during mining any possible finds are made, the operations must be stopped and a qualified archaeologist be contacted for an assessment of the find.

10. LIST OF PREPARES

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11. REFERENCES

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ANNEXURE A:

Heritage Sites

Drawing compiled by:
March 2007

Environmental Solutions Provider

Scale: 1:500 000

Metre
0 500 1000 1500 2000 2500

Plan 3

Lime - Chem

Heritage Sites