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**Assessment and comments on the illegal destruction of site 4L as addendum to
the**

1st PHASE

CULTURAL HERITAGE IMPACT ASSESSEMENT

FOR THE FARMS

**DONKERPOORT 448 KQ, RANDSTEPHNE 455 KQ AND WATERVAL 443 KQ, THABAZIMBI,
LIMPOPO PROVINCE.**

January 2015

REPORT PREPARED BY

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1. Background.

During 2011 African Heritage Consultants prepared a first phase cultural heritage impact assessment for Aquila for the proposed development of a new iron ore mine near Thabazimbi. This report was submitted in June 2011 and was edited in February 2014 owing to proposed alterations in mining pit, dumping sites and infrastructure. It was appended in May 2014 with specific risk assessments for each individual site.

The above report clearly indicated all protected sites with special mention of the Gatkop cave spiritual site, the Randstephne Farm Dwelling, the labourers' graves and all the Later Iron Age archaeological sites, and what mitigation procedures were appropriate.

All the Later Iron age sites were field rated according to the SAHRA system and were all classed under: -

“General protection” A (Field Rating IV A): (sites that should be mitigated before destruction.

Even though these sites are individually of low rating, as a group they are of significance. This is owing to the fact that Later Iron Age activities in the specific area are not well understood or researched at present.

It was clearly pointed out in the report that not only the sites that were proposed to be impacted upon should be mitigated before mining commences, but all of the known sites. The reason for this being that once mining commences no further study on the non-impacted sites will be possible and an important archaeological resource will have gone astray.

Site 4L.

The existence of this site was pointed out to the investigator by the field geologist at the time of the first phase assessment, and this was confirmed by Google Earth imagery at the time. It was not visited by the investigator owing to its remoteness and high altitude but was earmarked for second phase assessment in the original report.

During the 2014 re-evaluation of the first phase report it became clear that roads had been built to the site and that it had been destroyed by the clearance of an area of approximately one hectare in extent.

It was also established that no environmental or heritage impact assessment was compiled for this road building enterprise.

Inquiries by the investigator at Aquila's offices provisionally indicated that the roads were built by the farmer and owner of Waterval 443 KQ, Mr. Venter. At that time Mr. Bronkhorst the exploration manager, Thabazimbi region, of Aquila emphatically related to the investigator that the Aquila exploration team had ***“improved”*** and ***“extended”*** the roads made by Mr. Venter. The reason for this given at the time was ***“for invasive exploration”*** on the mountain.

During a site visit to 4L on the 11th August 2014 by the archaeologist and the acting exploration manager, Thabazimbi region, Mr J Bronkhorst it was established that site 4L, was destroyed by the clearance of a level area, one hectare in extent, effectively destroying the whole of site 4L. The

purpose of this clearing cannot be established at this point. (*See addendum 1 for report on the site visit.*)

Contention.

After Aquila received the site visit report in August 2014 Mr Johan van Breda of Aquila approached the author through a meeting at the offices of Shangoni to alter report and stating that Aquila “improved” the roads to gain access to areas for prospecting (drilling) purposes. Aquila was however not responsible for the destruction of site 4L.

This request was denied as it was not clear to the investigator who was responsible or not for the building and improvement of the roads and the destruction of the site, as all that he could rely on was his personal observations.

Mr Van Breda then, during the meeting, stated that Aquila will provide a statutory declaration to the effect that Aquila had in fact not participated in the destruction of site 4L. (*see addendum 2.*)

The affidavit dated 29/9/2014 made by Mr Bronkhorst was duly received in which it states that: -

“The track running through site 4L is a pre-existing farm road and was not constructed by Aquila nor was this area of track improved by Aquila”

This statement by Aquila then clearly puts the responsibility of the destruction of the site on the owner of the farm as there was as far as known no other agents involved with any road building on the farm.

As neither African Heritage Consultants nor Shangoni Management Services have judiciary functions this case must now be resolved by SAHRA.



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ADDENDUM 1:-

Site 4L. Visit on 11th August 2014.

During the first phase heritage impact assessment of the farms DONKERPOORT 448 KQ, RANDSTEPHNE 455 KQ and WATERVAL 443 KQ, THABAZIMBI, LIMPOPO PROVINCE in 2011 a number of *Later Iron Age* sites were identified on the farm Waterval. One of these, site 4L was pointed out to the archaeologist, by the on-site geologists that was busy with a grid search of the property to establish its geological under-built. Owing to Site 4L's location some 300 meters above the valley floor and only accessible on foot, the site was not visited by the archaeologist at that time. It was only noted as a heritage site in the first phase survey that had to be re-investigated if so required by the future location of the mine and its infrastructure.¹

Eventually it was proposed that the proposed new mine were to be located some 5 kilometres to the east of site 4L. This implied that the farm Waterval were not to be impacted on at all by the new Meletse Iron Ore Mine.

Owing to the fact that the establishment of the mine was strongly opposed by the community, it was necessary for the main environmental management company, Shangoni Management Services, to revisit all impact studies, including the heritage study, in August 2014.

During this re-evaluation it became clear that two new roads were built from the valley floor to the position of site 4L during the intervening period. One from the east and one from the west. Aquila maintains that these roads were built by the owner of the farm, Mr Venter. Aquila maintains that Aquila's exploration group "*had but improved these roads*" (after being granted access by the farmer) "*for invasive exploration*" on the mountain. The appearance of these roads and their "improvement" is clearly mapped by Google Earth images as can be seen in figures 13 to 16 at the end of this report.

During a site visit to 4L on the 11th August 2014 by the archaeologist and the acting exploration manager, Thabazimbi region, Mr J Bronkhorst it was established that site 4L, was destroyed by the clearance of a level area, one hectare in extent, effectively destroying the whole of site 4L. The purpose of this clearing cannot be established at this point.

However one section of wall was not destroyed. This section then possibly indicates the eastern perimeter of the site. With this one may estimate its evident original extremity. The existence of this site and its approximate limits is then also indicated by the localized occurrence of the grass type known as *Cenchrus ciliaris*². (See figures 7 to 11 below).

¹ See page 32 of the first phase report where site 4L's field rating is given as

4L	EARLY 19 TH CENTURY VILLAGE.	"General protection" A (Field Rating IV A): this site should be mitigated before destruction.
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² In *Later Iron Age* archaeological sites of the region *Cenchrus ciliaris* (buffelgrass or African foxtail grass) is always associated with cattle kraals owing to the concentration of nutrients (dung) and seed of this grass as preferred feeding by stock in general. *Cenchrus ciliaris* (buffelgrass or African foxtail grass; *syn.* *Pennisetum ciliare* (L.) Link) is a species of *grass* native to most of *Africa*, southern *Asia* (east to *India*), southern *Iran*, and the extreme south of *Europe* (*Sicily*). It is a *perennial* grass growing to 50 cm tall. *Cenchrus ciliaris* has become *naturalised* and often an *invasive species* in *Australia*, the southwestern *United States*, *Hawaii*, *Mexico*, *Central America*, *South America*, and

It is not clear for the investigator who is accountable for the destruction of the archaeological site, as Aquila astutely denies being responsible and no interview with Mr. Venter could be obtained. From a legal point of view, the building of the road and the clearance of the site and the “improvement” of the road and the “extension” of the road has been executed without the procurement of the necessary impact assessment and the adherence to the recommendations of such a report.



Fig. 01 - 04. From the above it is clear that this perimeter wall is “substantial” in character. From site evaluation it may have been at least 900 mm wide and may also have been as high as 1100 mm. A section of at least 25 meter has been preserved.

Macaronesia. In the Sonoran Desert it was introduced for erosion control. In the Mexican part of the Sonoran Desert, it is still being planted and irrigated for livestock grazing.



Fig. 05. Acting exploration manager, Thabazimbi region, Mr. J Bronkhorst, busy mapping the remaining wall with a Trimble GPS pathfinder.

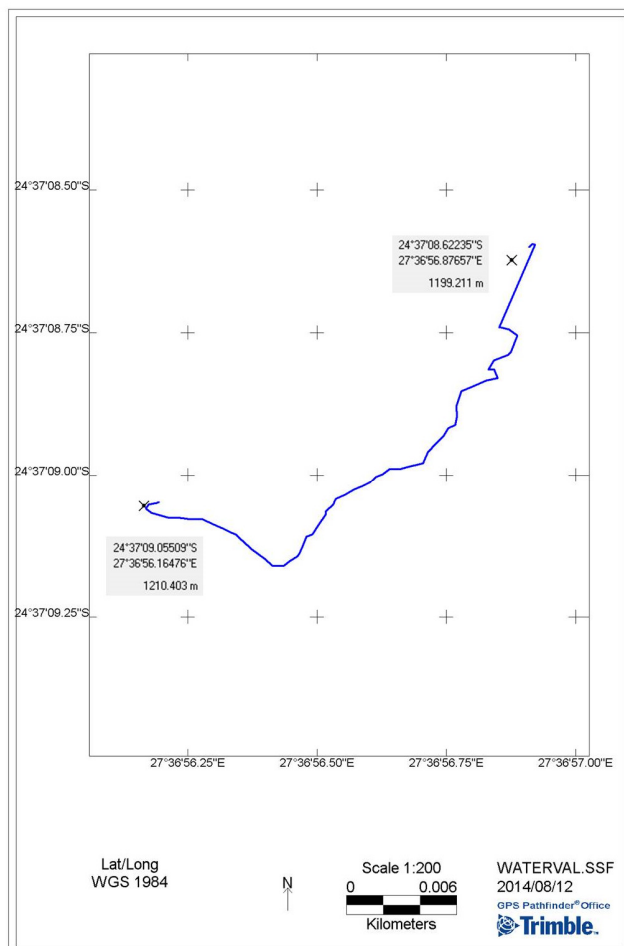


Fig. 06. Plot of the route of wall as recorded by Mr. Bronkhorst.



Fig. 07 - 09. General views of the “cleared” site 4L showing the coverage of the site by *Cenchrus ciliaris*.



Fig. 10 - 11. General views of *Cenchrus ciliaris* t on the left, and the “normal” grass in the general area.



Fig. 12. General views from site 4L towards the west showing its extreme elevation above the valley floor (approximately 300 meter)

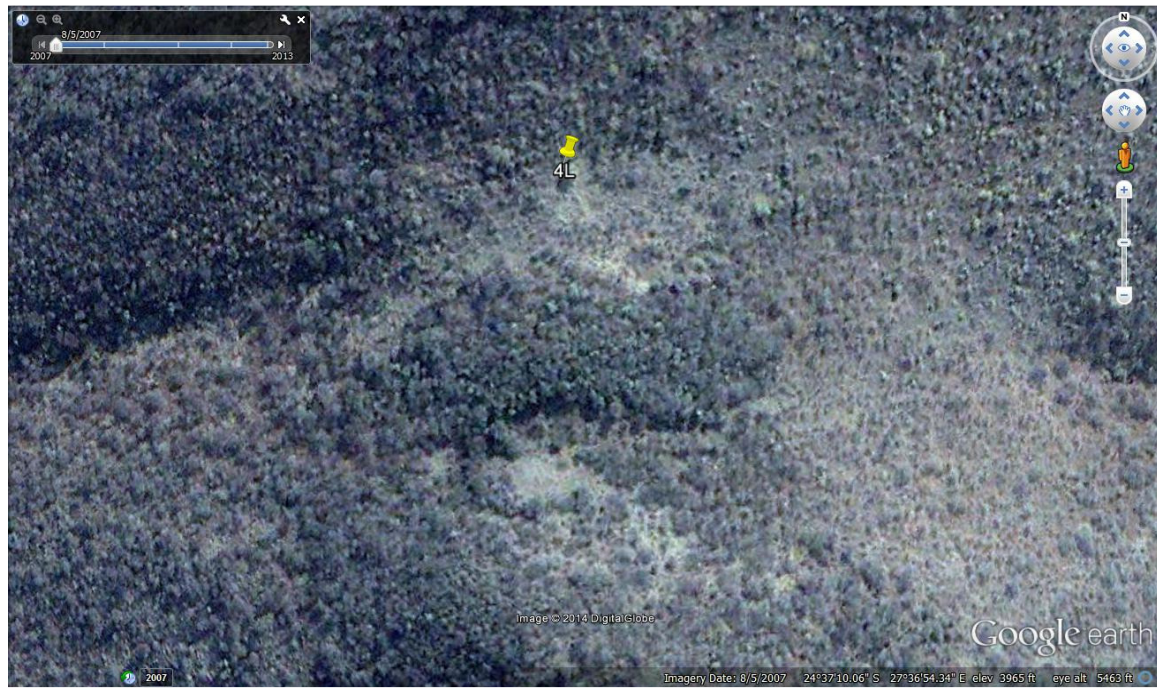


Fig. 13. 2007 image of Google earth showing undisturbed condition of site 4L in particular and the mountain in general.

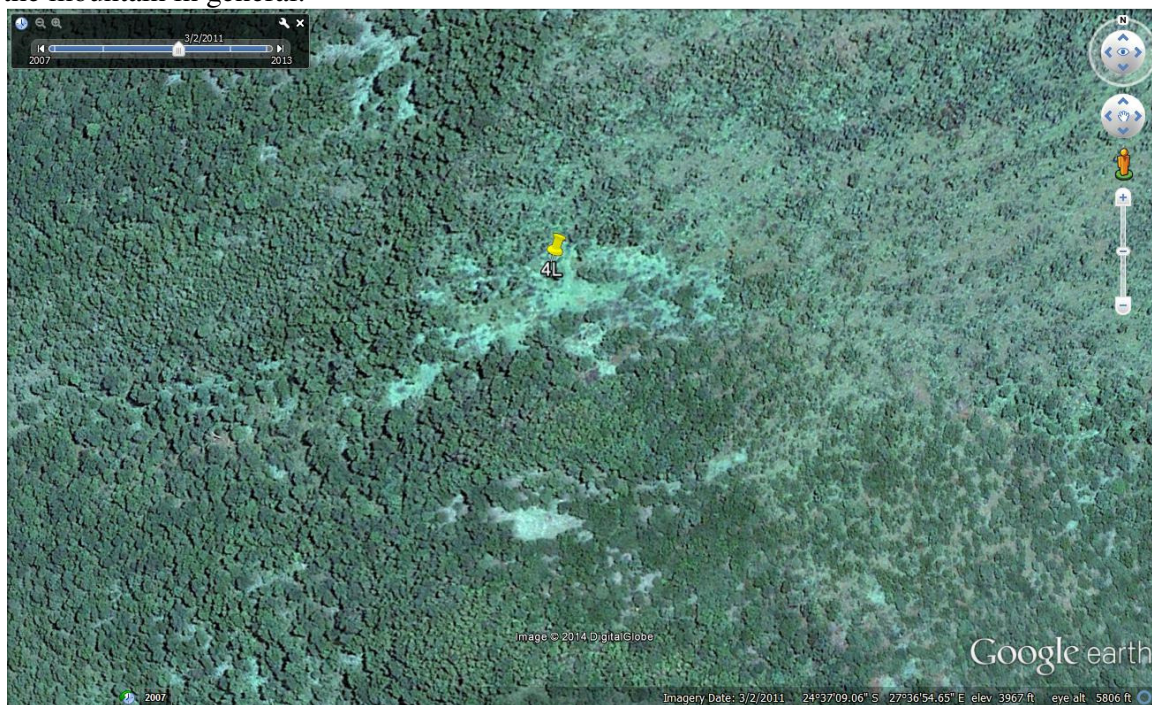


Fig. 14. 2011 image of Google earth showing undisturbed condition of site 4L in particular and the mountain in general. It was in this year that the first heritage impact assessment was conducted.

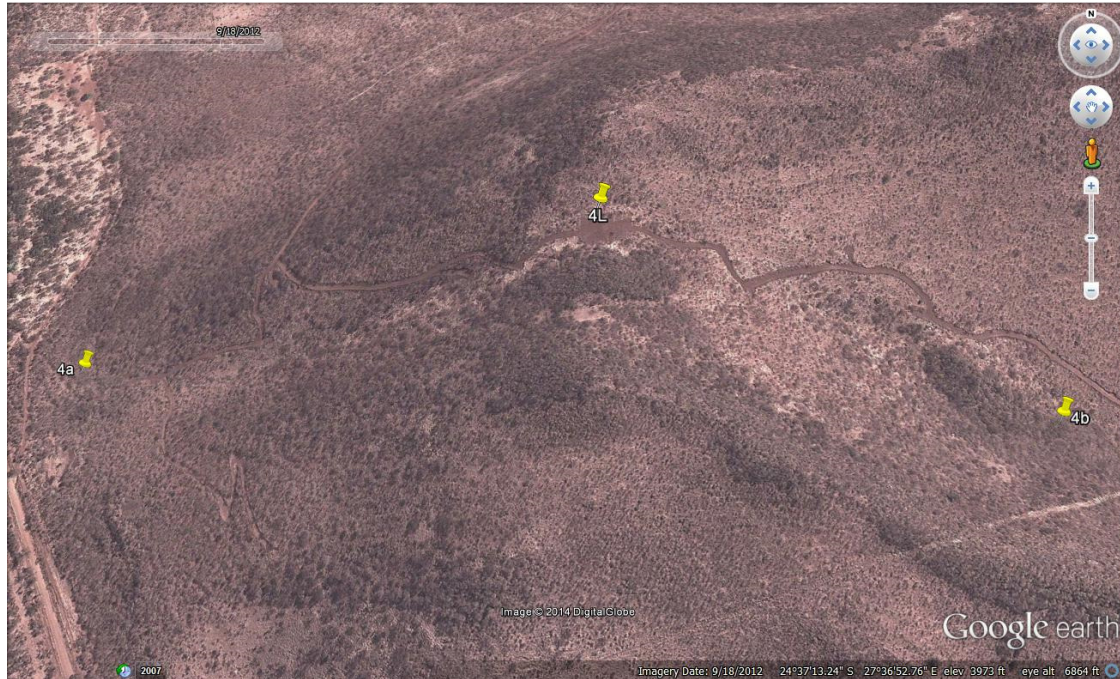


Fig. 15. 2012 image of Google earth. In this period the farmer, Mr. Venter, apparently decided to construct a substantial road network on the farm Waterval. According to Mr. Johann Van Breda Aquila then assisted the farmer to “*improve*” some of his roads for the purpose of “*invasive exploration*”.



Fig. 16. 2013 image of Google earth. Here is plotted the remaining perimeter wall and the possible extent of the destroyed site. Also note new road leading along the contour of the mountain. (Not made by Mr. Venter)

Addendum 2



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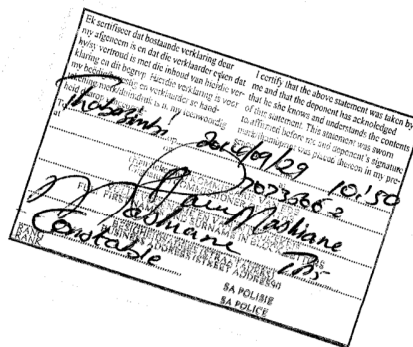
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STATUTORY DECLARATION

FROM: Senior Geologist
DATE: 29 September 2014
SUBJECT: STATUTORY DECLARATION: SITE 4L

I, Jacques Bronkhorst, Senior Geologist for Aquila Steel (S.Africa) PTY LTD, Based in Thabazimbi, declare that:

The track running through site 4L is a pre-existing farm road and was **not constructed** by Aquila nor was **this area of track improved** by Aquila. The track running through the site was only accessed by light vehicles for geological mapping.




J Bronkhorst
Senior Geologist

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