

Attention:

Me. C. Lambrechts
Enviridi Environment (Pty) Ltd
Pretoria

04/11/2018

RECOMMENDED EXEMPTION FROM ARCHAEOLOGICAL IMPACT ASSESSMENT

STUDY: EXTENSION OF THE TWO RIVERS PLATINUM MINING RIGHT AREA, STEELPOORT, LIMPOPO PROVINCE

Two Rivers Platinum (Pty) Ltd appointed Malan Scholes Consulting (Pty) Ltd to undertake the environmental authorisation process to extend the Two Rivers Platinum (TRP) mining right to include the Tamboti Mining Right Area and Prospecting Right Areas. The mine of Two Rivers Platinum, who forms a Joint Venture between African Rainbow Minerals (ARM) and Impala Platinum, is located roughly 20km southwest of Steelpoort and falls within the Greater Tubatse Local and Sekhukhune District Municipalities (**Figure 1**).

A New Order Mining Right (LP 178 MR) and Environmental Management Programme (approved 30 July 2015) allows TRP to explore and mine the Platinum Group Metals (PGM's), chrome and other precious metals (gold and silver), and associated base metals and ores thereof on portions of the farm Dwarsrivier 373 KT, Tweefontein 360 KT, Buffelshoek 368 KT and Kalkfontein 367 KT. The mine intends to extent the current mining area into the Tamboti Mining Right (LP 165 MR) located on Remaining Extent of the Farm Kalkfontein 367KT and the Tamboti Prospecting Right (LP 2125 PR) located on Portion 1,2,3,4,5,6,8,9,10 and 11 of the Farm Kalkfontein 367 KT (**Figure 2**). The inclusion of the proposed areas will allow the existing underground workings to be extended, therefore increasing the current Life of Mine (Mushiana 2018).

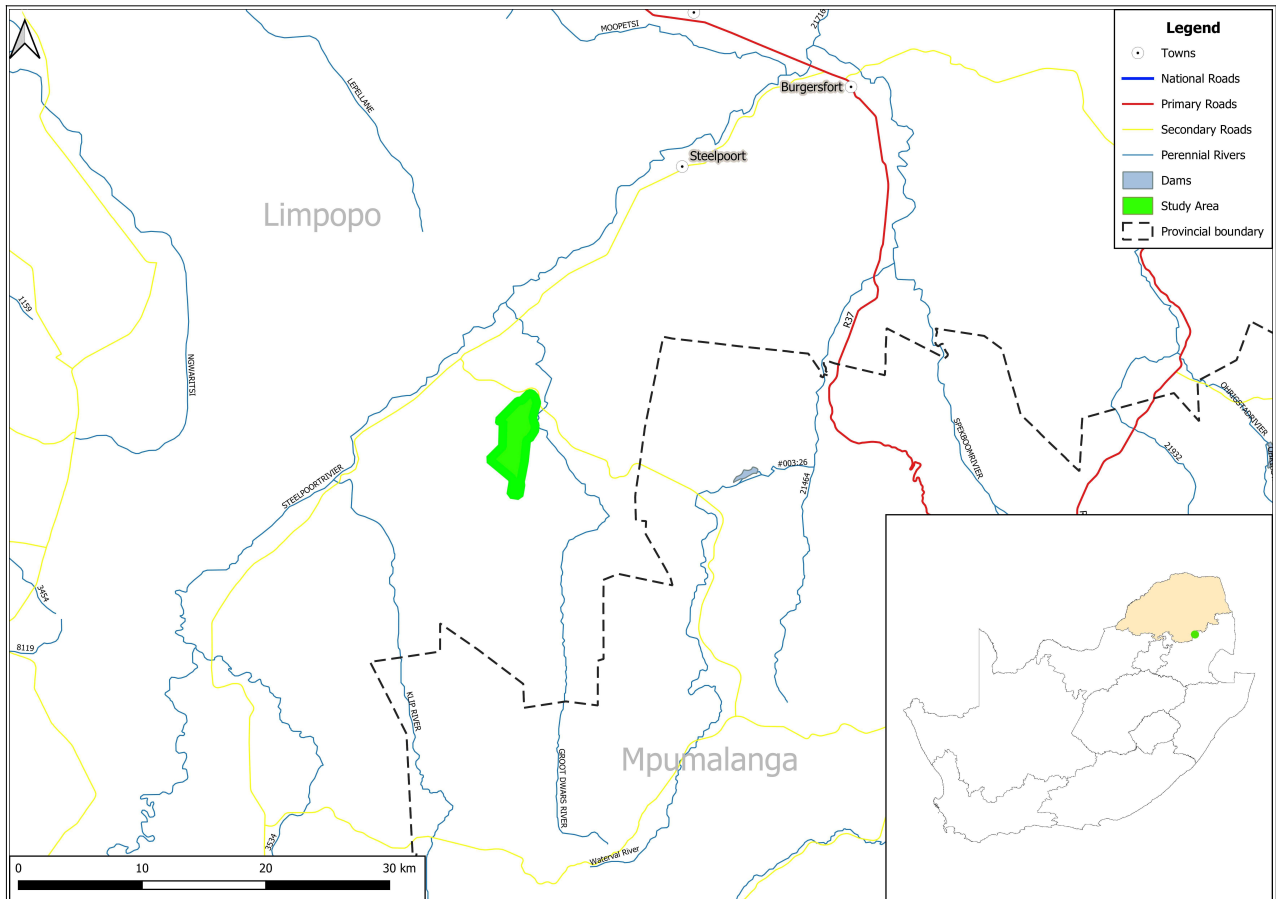


Figure 1: Regional and Provincial location of the study area.

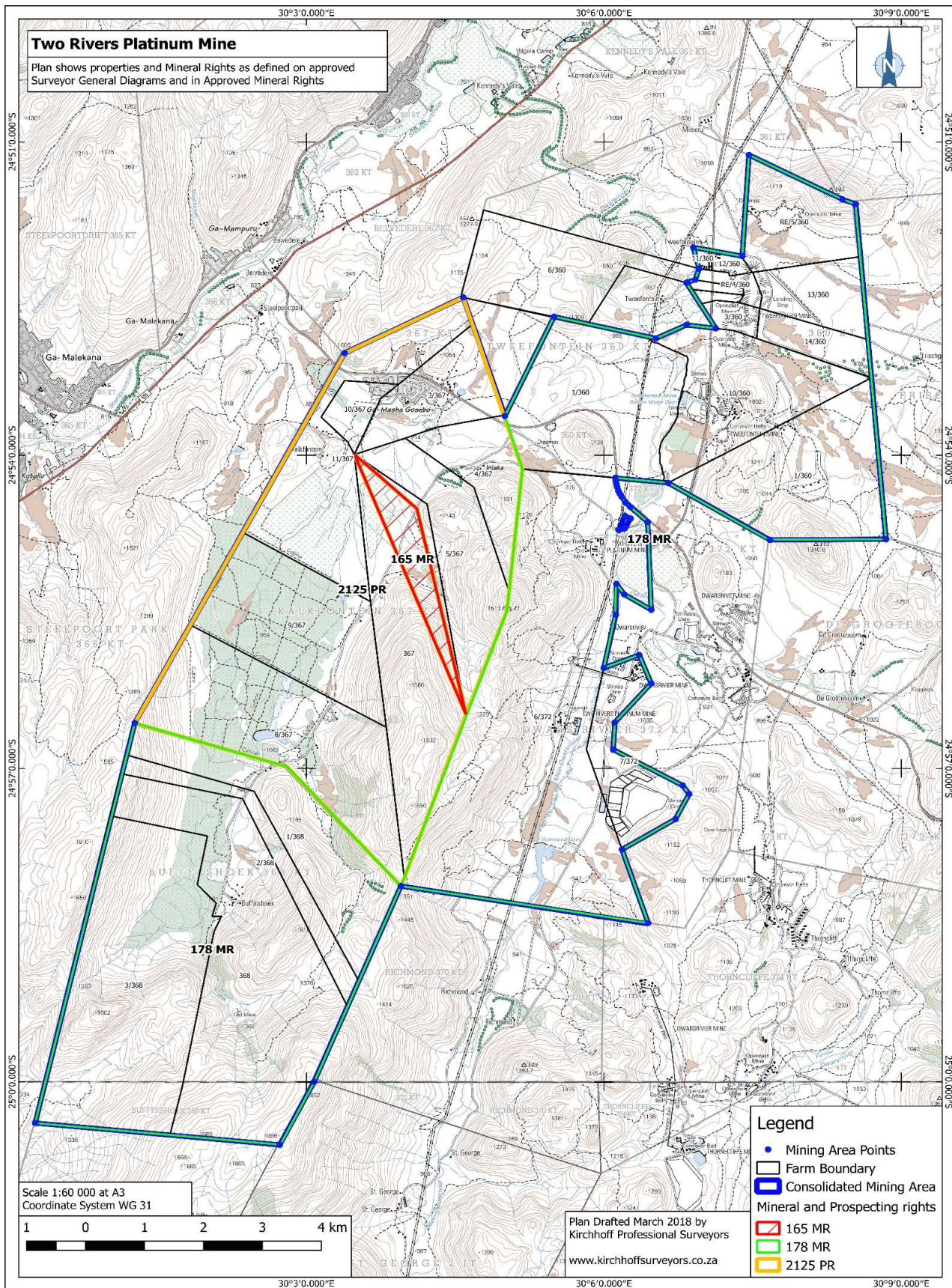


Figure 2: Mining Right Area. After Mushiana (2018)

The proposed extension of Two Rivers Platinum's underground mining activities to the Tamboti Mining Right Area and Prospecting areas will not include any surface construction activities, only the expansion of underground workings. The existing surface infrastructure will be used to store the ore body and dispose of the waste rock (**Figures 3 & 4**). In terms of heritage, a Heritage Impact Assessment was done by Pistorius (2009) on various portions of the of the Farms Kalkfontein 367KT and on Buffelshoek 368 KT. It is therefore important that this report be read in conjunction with the existing HIA. The HIA survey revealed several graveyards on Portion 8 of the Farm Kalkfontein 367 KT, located about 1.1 km west of the boundary of the 2017-2022 mining schedule. The previously identified heritage sites (**Table 1**), as well as the rough extent of the current mining infrastructure, were plotted on a topographical map (**Figure 4**).

Because the proposed expansion will consist of underground mining only, it is recommended that the applicant applying for the extension of the underground mining area be exempted from further Phases of archaeological impact assessments, subject to minimum standards: Archaeological and Palaeontological Components of Impact Assessments as set out by the South African Heritage Resources Agency (SAHRA) which states that:

When a property is either very disturbed (e.g. has been quarried or mined) or is very small and the archaeologist can see that it is highly unlikely that any archaeological remains will be found, a 'Letter of Recommendation for Exemption' from a full Phase 1 report may be supplied.

The following recommendations are made in order to avoid the destruction of heritage remains in the demarcated areas:

- Should the need arise to develop any additional surface areas, it is recommended that the area be inspected by a qualified archaeologist. This stems from the fact that Pistorius (2009) stated that additional burial sites that were not observed during the survey, might exist within the study area.
- Because only existing mining infrastructure will be utilised for the proposed mining activities, no additional impacts should occur. Therefore, the proposed development may continue, subject to the abovementioned conditions.
- Should culturally significant material may be exposed, all activities must be suspended pending further archaeological investigations by a qualified archaeologist. Also, should skeletal remains be exposed, all activities must be suspended and the relevant heritage resources authority contacted (See National Heritage Resources Act, 25 of 1999 section 36 (6)).

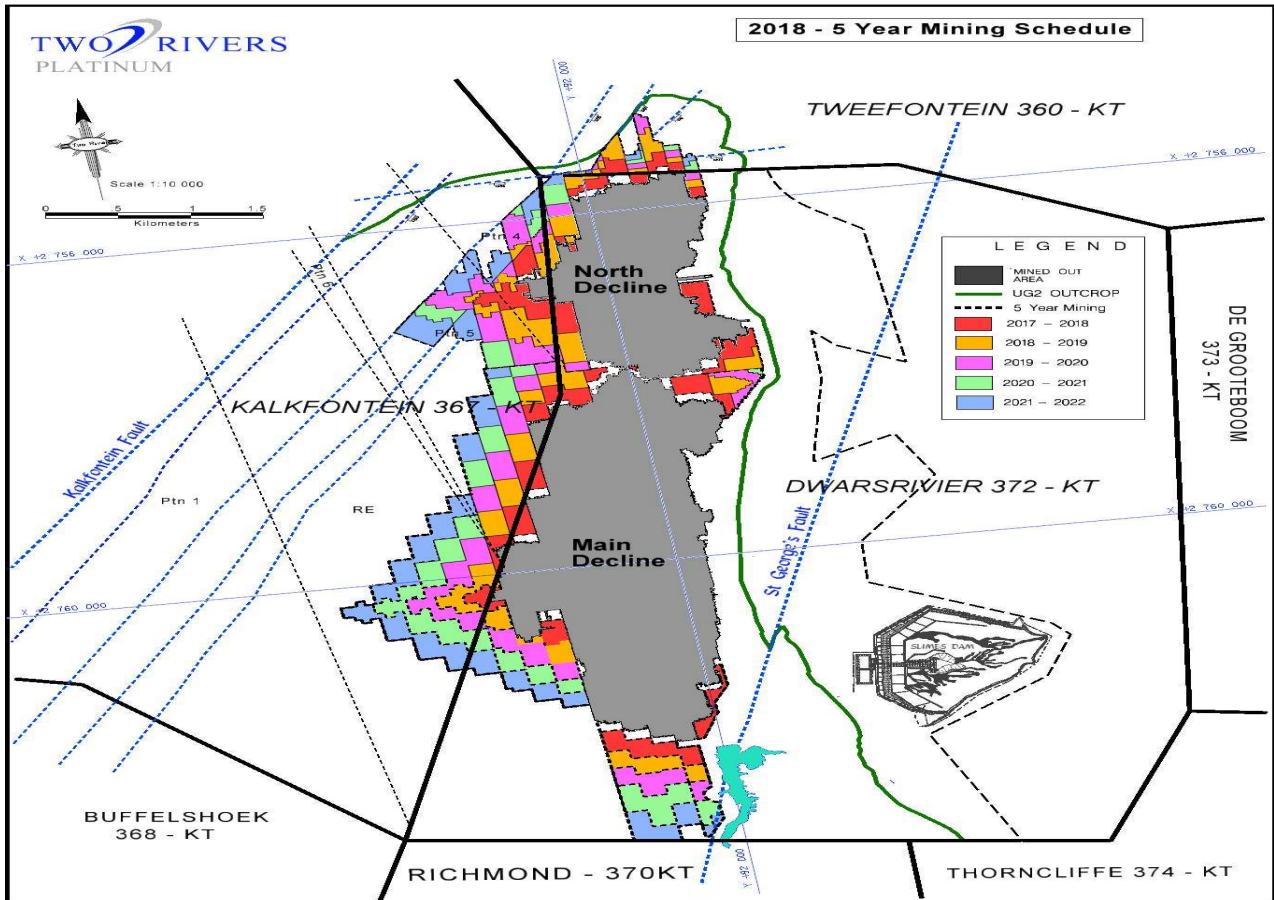


Figure 3: Mining Schedule and infrastructure. After Mushiana (2018)

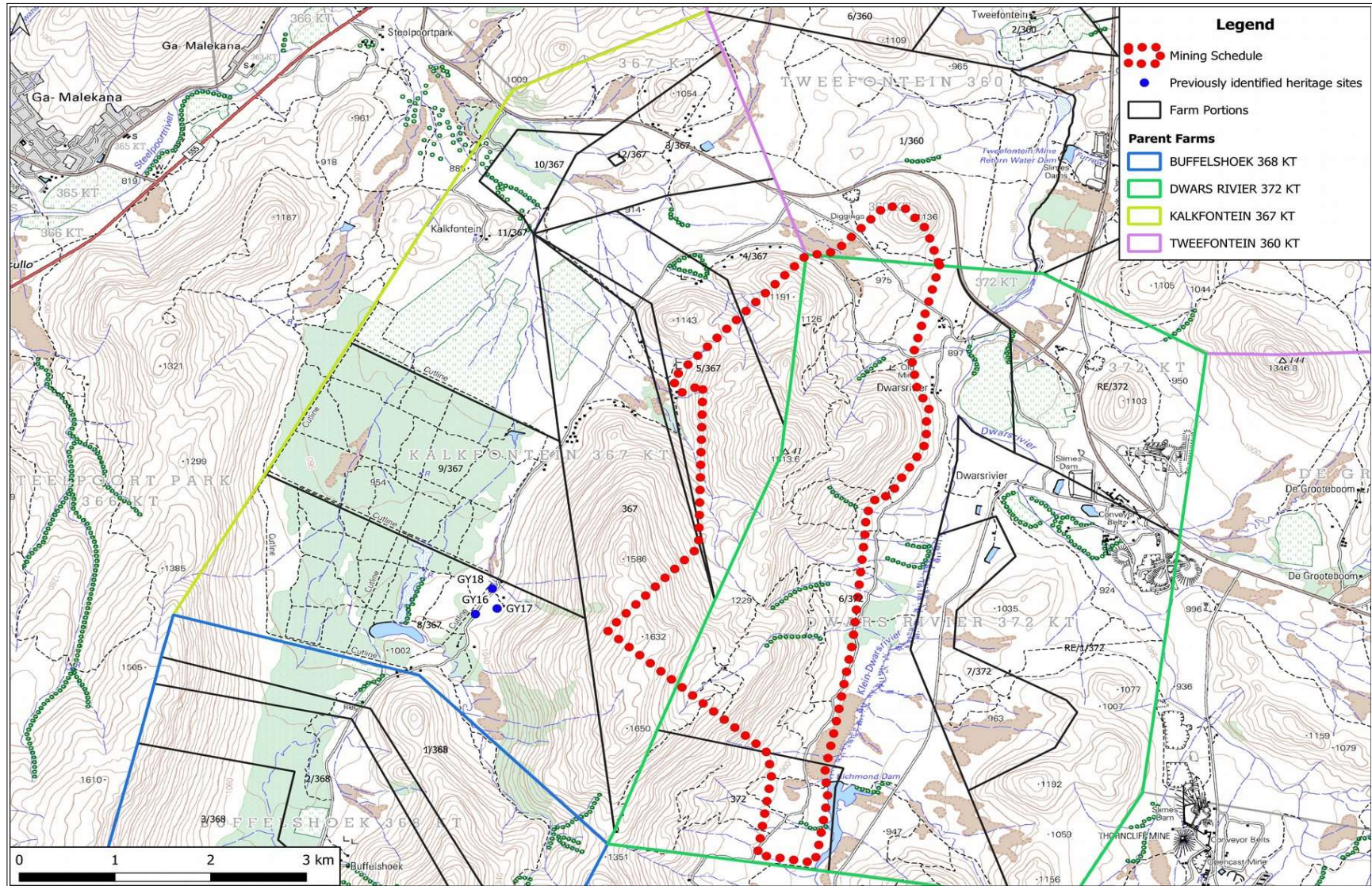


Figure 4: Segment of SA 1: 50 000 2430 CC indicating the study area and previously identified heritage sites.

Table 1: Previously identified heritage sites

Site	Farm Portion	Location
GY16	8 of the Farm Kalkfontein 367 KT	S: -24.94295 E: 30.05206
GY17	8 of the Farm Kalkfontein 367 KT	S: -24.94231 E: 30.05431
GY18	8 of the Farm Kalkfontein 367 KT	S: -24.94006 E: 30.05381

General Legislation

The National Heritage Resources Act (Act No. 25 of 1999, section 38) provides guidelines for Cultural Resources Management and prospective developments:

“38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as:

- (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*

- (a) the construction of a bridge or similar structure exceeding 50m in length;*

- (b) any development or other activity which will change the character of a site-*
 - i. exceeding 5000m² in extent; or*

 - ii. involving three or more existing erven or subdivisions thereof; or*

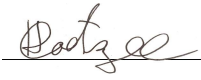
 - iii. involving three or more erven or divisions thereof which have been consolidated within the past five years; or*

 - iv. the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;*

- (c) the re-zoning of a site exceeding 10000m² in extent; or*

- (d) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the*

responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.” (38. [1] 1999:62-64)

A handwritten signature in black ink, appearing to read 'Tobias Coetzee', written over a horizontal line.

Tobias Coetzee

MA (Archaeology)

References

- Mushiana, V. 2018. Scoping Report for the Proposed Extension of the Two Rivers Platinum Mining Right Area, Steelpoort, Limpopo Province. Limpopo: Two Rivers Platinum
- Pistorius, J. 2009. A Phase 1 Heritage Impact Assessment (HIA) Study for Proposed Prospecting and Mining Activities on Various Portions of the Farm Kalkfontein 367KT and on Buffelshoek 368KT in the Steelpoort Valley in the Limpopo Province of South Africa. Pretoria: Dr Julius CC Pistorius