



AFRICAN HERITAGE CONSULTANTS CC

2001/077745/23

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A. PHASE I CULTURAL HERITAGE RESOURCES IMPACT ASSESSMENT

(a) PHASE I CULTURAL HERITAGE RESOURCES IMPACT ASSESSMENT FOR THE EXPROPOSED NEW TYGERKLOOF MINE AN EXTENSION OF THE EXISTING RHINO ANDALUSITE MINE ON PORTION 5 OF THE FARM TYGERKLOOF 354 KQ THABAZIMBE DISTRICT LIMPOPO PROVINCE

(b) REPORT COMPILED BY

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(c) DEVELOPER AND CONSULTANT INFORMATION

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Date of report: 20 February 2015

B. EXECUTIVE SUMMARY

The site was inspected on foot and by vehicle. All appropriate reports on the area were studied. The area is mixed bushveld. A large section of the area is so overgrown with sicklebush (*Dichrostachys cinerea*) that walking through this section is impossible. On the development area no important cultural heritage resources or graves were found.

Just west of the proposed development area is a large rock shelter where Later Stone Age and Iron Age material is present. To the north of this site lies the best preserved Iron Age Ancient mine.

- There is no objection to the development of the new mine on Tygerpoort as none important Cultural Heritage resources or graves are present. If the area is cleared for mining purposes an archaeologist should be present to identify and mitigate any possible archaeology sites.

- Rock Shelter

This is a sensitive site which may contain important archaeology material and is next to the proposed new mining site. For this reason it needs a proper Heritage Management Plan to safeguard it from vandalism.

- Ancient Mine on Buffelsfontein

The collapse of a section of the ancient mine was most probably the result of recent mining and blasting. This site urgently needs a Heritage Management Plan which should include measurements to prevent water entering the old shafts as well as a detail survey and mapping of the ancient mine and surface area in a phase II heritage investigation

If during construction any cultural heritage resources or graves are unearthed all work has to be stopped until the site has been inspected and mitigated by a cultural heritage practitioner.

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D. BACKGROUND INFORMATION ON PROJECT

(a) Whether the report is part of a scoping report EIA/HIA or not

Report will form part of an EIA, Mining right and associated Water use licence

(b) Type of Development (e.g. low cost housing project, mining etc.)

Mining – open cast

(c) Whether re-zoning and/or subdivision of land is involved

No re-zoning

(d) Developer and consultants and owner contact details

Prepared for:

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(e) Terms and Reference

The broad generic term *Cultural Heritage Resources* refers to any physical and spiritual property associated with past and present human use or occupation of the environment, cultural activities and history. The term includes sites, structures, places, natural features and material of paleontological, archaeological, historical, aesthetic, scientific, architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.

(f) Legislative requirements of Act 25 of 1999.

Protected sites in terms of the National Heritage Resources Act, Act No. 25 of 1999

The following are the most important sites and objects protected by the National Heritage Act:

- Structures or parts of structures older than 60 years.
 - Archaeological sites and objects.
 - Paleontological sites.
 - Meteorites.
 - Ship wrecks.
 - Burial grounds.
 - Graves of victims of conflict.
 - Public monuments and memorials.
 - Structures, places and objects protected through the publication of notices in the Gazette and Provincial Gazette.
 - Any other places or objects, which are considered to be of interest or of historical or cultural significance.
 - Geological sites of scientific or cultural importance.
 - Sites of significance relating to the history of slavery in South Africa.
 - Objects to which oral traditions are attached.
 - Sites of cultural significance or other value to a community or pattern of South African history
- Mining rights reference: DMR ref: LP30/5/1/2/2/10093MR
EIA Reference 12/1/9/2-W83
Water use reference: none allocated
 - Mining right: Minerals and Petroleum Resources Development Act no 28 of 2002
 - National Water Act no 36 of 1998
 - EIA: National Environmental Management Act no 107 of 1998

E. BACKGROUND TO THE ARCHAEOLOGICAL AND HISTORY OF THE AREA

Resources, and in particular the mineral resources (Küsel 1998), in what is now known as the Thabazimbi region have been extensively utilised by prehistoric and historic groups. The greater region has several important Stone Age localities with deep occupation deposits and importantly, a widespread occurrence of open-air sites. The shelter site of Olieboomspoort near Lephalale show a succession from the Earlier, Middle and Later Stone Ages (ESA, MSA and LSA) and up to historic times (van der Ryst 2006). Early Iron Age (EIA) localities such as Diamant are particular important. At this locality in the western Waterberg the EIA facies of Diamant was first identified at the eponymous locality (Huffman 1990). This site has also delivered the earliest evidence for glass trade beads and domesticated dogs in the Limpopo

Province (van der Ryst 2006). The movement of African farmers into this region is documented by their ceramics and settlements (Huffman 2007b). The later occupations of agropastoralists groups are complex (Schapera 1942, 1965; Breutz 1953, 1989; Bergh 1998). The accounts of early travellers provide important data on the fauna, flora and inhabitants of the Waterberg. The observations of travellers, missionaries and hunters who traversed the region throughout the 18th and the 19th centuries constitute a source of implicit ethnography on the late presence of hunting and gathering groups, the African farmers and inmoving colonists (Baines 1872, 1877; Smith 1836; Schlömann 1896; Wallis [Baines] 1946; Burke [Mauch's journals] 1969). The region is also rich in rock art (Eastwood and Eastwood 2006).

Heritage resources

Huffman (2004, 2006a, 2007a, 2009a) in surveys for Rhino Minerals Andalusite Mine on the Farm Buffelsfontein 353 KQ recorded an EIA village on red colluvial/alluvial deposits and several grainbins. The LIA homesteads contained several burnt houses. He ascribed the burning to a severe drought (Huffman 2009b). He also noted MSA lithics but not of any significance. In a subsequent AIA no settlements were recorded but isolated fragments of pottery and slag suggest a buried occupation (Huffman 2009a).

Van Schalkwyk (2007) in an assessment for cultural heritage resources on sections of the farms Amandelbult 383KQ and Elandsfontein 386KQ in the Thabazimbi District recorded surface MSA and LSA lithics. He also noted two possible EIA sites whereas most of the others that were identified are from the Late Iron Age/early Historical period, the latter features assigned Medium significance. A buffer zone is already in place following on previous recommendations on Iron Age remains within this general area (Van Schalkwyk 1994, 2001, 2003, 2004; Van Schalkwyk et al. 2004).

Coetzee (2008) in a report for the PPC expansion project recorded only a small Stone Age lithic scatter from the prehistoric period. However, 10 historical houses from the 1930s to 1940s have been documented as well as several graves. He provides a synthesis of the Stone Age and Iron Age (IA) sequences. In the latter the different settlement phases of the Early Iron Age (EIA) are defined, namely Happy Rest, Diamant and Eiland. The Late Iron Age(LIA) sequence is much more complex, with numerous groups moving into the region. The mainly stone-walled settlements are also more visible. Based on ethnographic accounts (Schapera 1942, 1965; Breutz 1953, 1989; Bergh 1998) he provides an overview of the ethnographic sequence of groups who occupied the region, such as the Bakgatla baga Kgafela, and the Batlokwa ba Kgosi and provides detail on the trust farms occupied. In the greater region Dreyer (2011) in an assessment for proposed chrome mining developments found no heritage remains at Hartbeestkopje 367KQ, Schilpadnest 385KQ and Moddergat 389KQ, in the Northam District but recorded historical material at Zwartkop 369KQ.

At Boikarabelo excavations of an extensive grainbin-site and surface collections of around 12 IA settlements demonstrated Tswana settlement sequences that include a probable early Moloko (probably Icon) facies and at least one site had been identified to the Letsibogo facies. The relative age of the sites were therefore inferred to range from the late 17th to late 18th centuries (Digby Wells Environmental 2011).

An HIA for the proposed development of the Kambaku Private School on the farm Vlakplaats 137 KQ yielded no evidence for heritage resources (Hutten 2012). Hutten (2013a, 2013b, 2013c) in several assessments for solar developments noted that there was an absence of heritage resources on the farms Liverpool and Aapiesdaai near Koedoeskop, whereas a historic structure, outside the developments, was recorded at Grootkuil. Coetzee (2014) in an assessment for the Marakele Park on the northern

edge of the Waterberg Plateau similarly found no heritage resources. The area is some distance from Thabazimbi. However the Waterberg region abounds in heritage and archaeological resources and forms part of the broader study region.

Van Vollenhoven in an HIA for the proposed development of a limestone mine on Portion 1 of the farm Nooitgedacht 136 JQ, Portion 1 of the farm Buffelskraal 545 KQ and Portions 3, 4, 5, 6 and the Remainder of Krokodilkraal 545 KQ in the Thabazimbi District reported that no heritage resources have been identified and that the surveyed properties have been used for cattle farming and extensive agriculture. In a draft scoping report for the proposed township on Portion 20 and 22 of the farm Theunispan 293 LQ, Portion 1-4 and a portion of the remainder of the Farm Grootdoorn 292 LQ, portion 3 of the Farm Steenbokpan 295 seven heritage sites of significance or value were identified within the area proposed for the development of the Steenbokpan Extension 3 Township. These comprise five informal cemeteries, all on portions of Grootdoorn and two historic structures of the Harmse family homestead (Ila 2014; PGS 2014).

In an extension of a mining licence for clay extraction on the farm Nooitgedacht 436 JR Portion 25 an informal cemetery with 15 graves was identified (African Heritage Consultants 2013). African Heritage Consultants (2011, 2014) in a Phase 1 AIA identified numerous stone-walled enclosures, a pre-colonial mine, graves, and historic structures that include a weir and bridge at the Sondagsriver. A Phase 2 mitigation was recommended.

The scoping report on heritage for Project Infinity Sishen Iron Ore Thabazimbi Mine (Shangoni Management Services 2013) noted that MSA lithics were present in an area with sheet erosion. The Mine has in the past encouraged research on the IA stone-walled enclosures on their property, and further research is supported. Mitigation of historical buildings, including the Du Randt Homestead, was also addressed. The proposed mining on Wachsteenbietjesdraai 350 KQ and Kwaggashoek 345 KQ is in close proximity from the Mostert Tunnel Cave south of Thabazimbi that has significant geological formations. Appropriate mitigation measures will be recommended (PGS 2012).

Gatkop Cave on the farm Randstephane 455 KQ ESE of Thabazimbi was also investigated. The locality lies within an area with rich iron ore deposits that are currently being explored by Aquila Resources in view of future extraction. It is an important heritage resource of high cultural significance that is still being used for ritual ceremonies and constitutes a contentious issue in view of the developments. This locality also has potentially high palaeontological heritage significance (Almond 2013). Madimatle Mountain at Donkerpoort 448 KQ and Gatkop Cave on Randstephane 455 KQ hold significant spiritual, ancestral and cultural heritage importance to the local community, local traditional healers, local traditional leaders, persons that practice and belong to certain African Christian denominations (van Vuuren 2014; SAHRA Statement of Significance, accessed SAHRIS 11 February 2015). Acting on the recommendations SAHRA has appointed an anthropologist who compiled a report on the significance of this locality (van Vuuren 2014). Madematle/Mletse Mountain and the Gatkop caves described as the Remainder of the Farm Randstephane 455 KQ and the Remainder of the Farm Donkerpoort 448 KQ have now been nominated as a Provincial Heritage Site (SAHRA 2014; SAHRIS database accessed February 2015).

F. DESCRIPTION OF THE PROPERTY OF AFFECTED ENVIRONMENT

(a) Detail of area surveyed:

- Full location Data for Province, Magisterial District/Local Authority and property (e.g. Farm erf) name and number etc.;

Environmental Impact Assessment for the expansion of the Tygerkloof Mine apart of the existing Rhino Andalusite Mine on Portion 5 of the farm Tygerkloof 354 KQ Thabazimbi District Limpopo Province

Thabazimbi Municipality
7 Rietbok Street
0380 Thabazimbi, Limpopo
South Africa
Phone: 014 777 1525
Fax: 014 777 1531

- Location map(s)/orthophotos of the general area. These must include the map name and number (e.g. 3313 DC Bellville). Maps must include at least a 1:50 000 and (if) available also a 1:10 000 (i.e. most detail possible). Large scale colour satellite photos make a useful addition. Maps should be preferable at least A4 size.

1/50 000 Map: Kaaldraai 2427CA

- Either the Location Map or the Site Map must have the polygon of the area surveyed marked on it and full geographical co-ordinates for all relevant points and where applicable, indication of the area to be developed (footprint).

Attached: pages 19 - 25

(b) Description of the Methodology

All documents on the area where studied. The site was visited together with another archaeologist and inspected on foot and by vehicle. The area is mainly mixed bushveld with very dense sicklebush near the foot of the mountain. This section is so dense that it can't be walked. To the east the bushveld is less dense but the lush grass cover made visibility bad.

G. DESCRIPTION OF SITES MAPPED

The proposed development area lies at the foot of a mountain range which runs from north to south. The area is mixed bushveld. The north western section is thick sicklebush (*Dichrostachys cenera*). It is so thick that walking through it is impossible – see photograph.



The dense growth of sicklebush is an indication of over grazing and utilisation. In this area archaeological sites should be present but will only be found if the area is cleared of sicklebush. When the mine cleans the area for mining an archaeologist should be present to identify possible archaeological sites.

The eastern section is more open bushveld with dense grass cover because of the good rains which also made surface inspection very difficult – see photograph.



Most of the inspection was on the road surface and eroded areas, which normally give a good indication of what Heritage remains are present – see photographs.



At some localities the bush was less dense because of cattle farming and watering. Here remains of farming activities were found – see photographs.





The area at present is used for game farming. The owner who knows the area well assured us that there are no graves present. He has worked in the area for many years.

Just west of the northern section of the development area is a large rock shelter. The floor of this shelter has a good archaeological deposit with Late Stone Age and Iron Age material present (Madikwe Facies). At the roof of the shelter small stalactites' are forming. On the floor is a single very large stalagmite – see photographs and map on pages 22 & 25.



Rock Shelter



Stalactites'



Very large Stalagmite



Late Stone Age and Iron Age remains

To the north of the development site on the farm Buffelsfontein 353 KQ is an ancient mine recorded by Küsel US (2003) at S24° 42' 40.5" & E27° 16' 00.9". At that stage Küsel informed SAHRA that the proposed mining activities would possible damage the ancient mine. The mining company undertook to fence the area in and to install instruments to monitor shock waves from blasting. The entrance to the mine has collapsed probable because of blasting. Rainwater also now runs into the underground section of the ancient mine - see photographs below and maps on pages 22, 23 & 24.



Collapsed Mine entrance



The inside of the mine

Roger Summons who has made a detail study of the ancient mining in Zimbabwe could find not a single complete mine as all the mines were destroyed by modern mining.

The ancient mine and surroundings were investigated by Prof Tom Huffman (2006) when the mine requested a second opinion after the author's original report. Huffman found a number of Early Sotho (Tswana) settlements at the foot of the mountain on Buffelsfontein and Tygerkloof as well as two iron smelting sites. He identified the pottery as Madikwe facies of the Moloko cluster. He had the sites dated which gave a date of 1485 -1615.

As far as the ancient mine is concerned he came to the conclusion that red ochre was mined. Unfortunately he did not investigate the mine itself. The author and his team entered the mine during our current visit and found no red ochre inside.

Huffman (2006) came to the conclusion that the settlements and the mine are interrelated. Huffman also suggested that the mine should be investigated. This is strongly supported as this mine is probably the most complete ancient mine in Southern Africa found up to date.

H. DESCRIPTION OF THE ARTEFACTS, FAUNA, BOTANICAL OR OTHER FINDS AND FEATURES

None

I. CLEAR DESCRIPTION OF BURIAL GROUNDS AND GRAVES

None founded

J. EVALUATION AND RATING (FIELD RATING)

Not applicable

K. STATEMENT OF SIGNIFICANCE (heritage value)

Not applicable

L. RECOMMENDATIONS AND CONCLUSION

- There is no objection to the development of the new mine on Tygerpoort as none important Cultural Heritage resources or graves are present. If the area is cleared for mining purposes an archaeologist should be present to identify and mitigate any possible archaeology sites, which might be exposed.

- Rock Shelter

This is a sensitive site which may contain important archaeology material and is next to the proposed new mining site. For this reason it needs a proper Heritage Management Plan to safeguard it from vandalism and a 50 meter buffer area around the site.

- Ancient Mine on Buffelsfontein

The collapse of a section of the ancient mine was most probably the result of recent mining and blasting. This site urgently needs a Heritage Management Plan which should include measurements to prevent water entering the old shafts as well as a detail survey and mapping of the ancient mine and surface area in a phase II heritage investigation

M. BIBLIOGRAPHY

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of the Farm Grootdoorn 292 LQ, Portions 20, 22 and 25 of the Farm Theunispan 293 LQ and Portion 3 of the Farm Steenbokpan 295 LQ at Steenbokpan, west of Lephalale in the Lephalale Local Municipality, Waterberg District, Limpopo Province. Client: Flexilor Properties (Pty) Ltd

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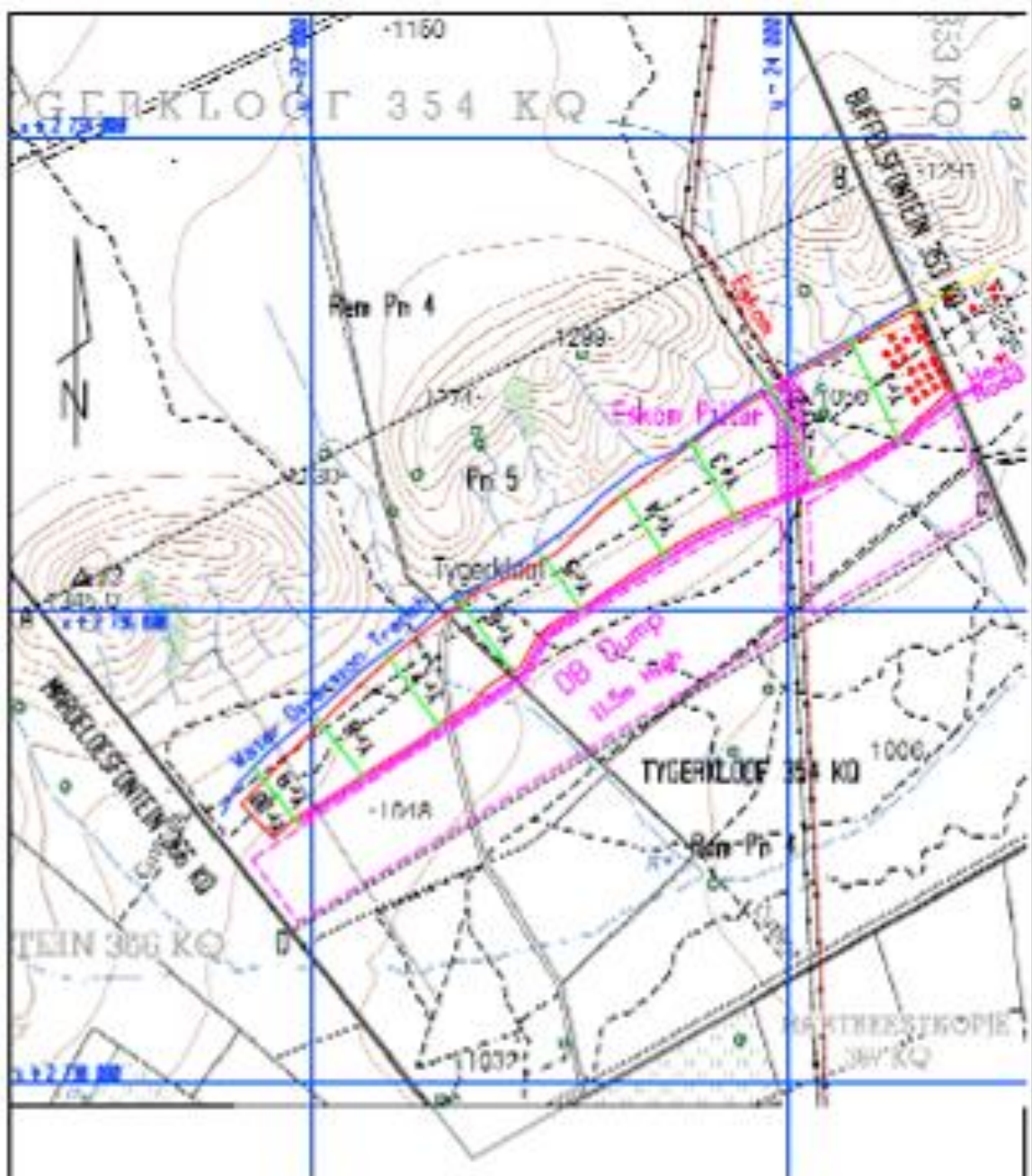
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N. APPENDIX

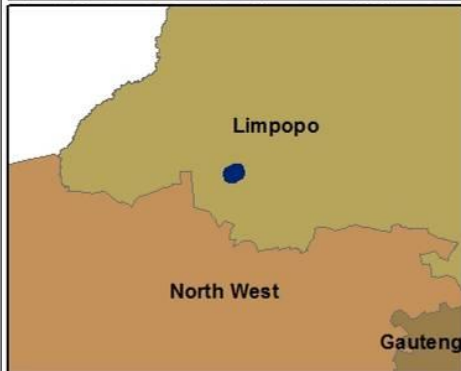
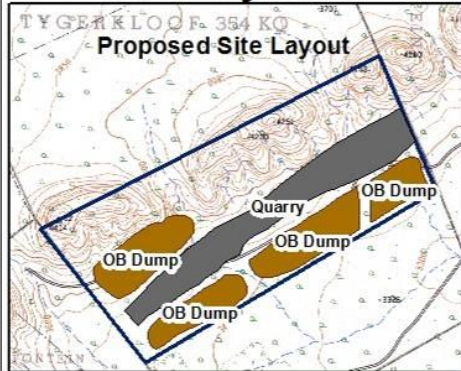
- Maps: page 19 - 25
- Significance document - Addendum A page: 26
- Declaration of independence Addendum B page: 30



RHINO ANDALUSITE MINE
12-Year Mining Plan for Tygerkloof Pit
SCALE: A3 = 1:15 000

Dwns RC Date: November 2014 Refs: TygPlan_Rev83.dgn

Rhino Andalusite Mine Locality Plan



Legend

- Tygerkloof 354KQ Portion 5
- Mine Access road

Date: 2014/08/14
 Coordinate System:
 Hartebeesthoek94 Lo27

rational environmental



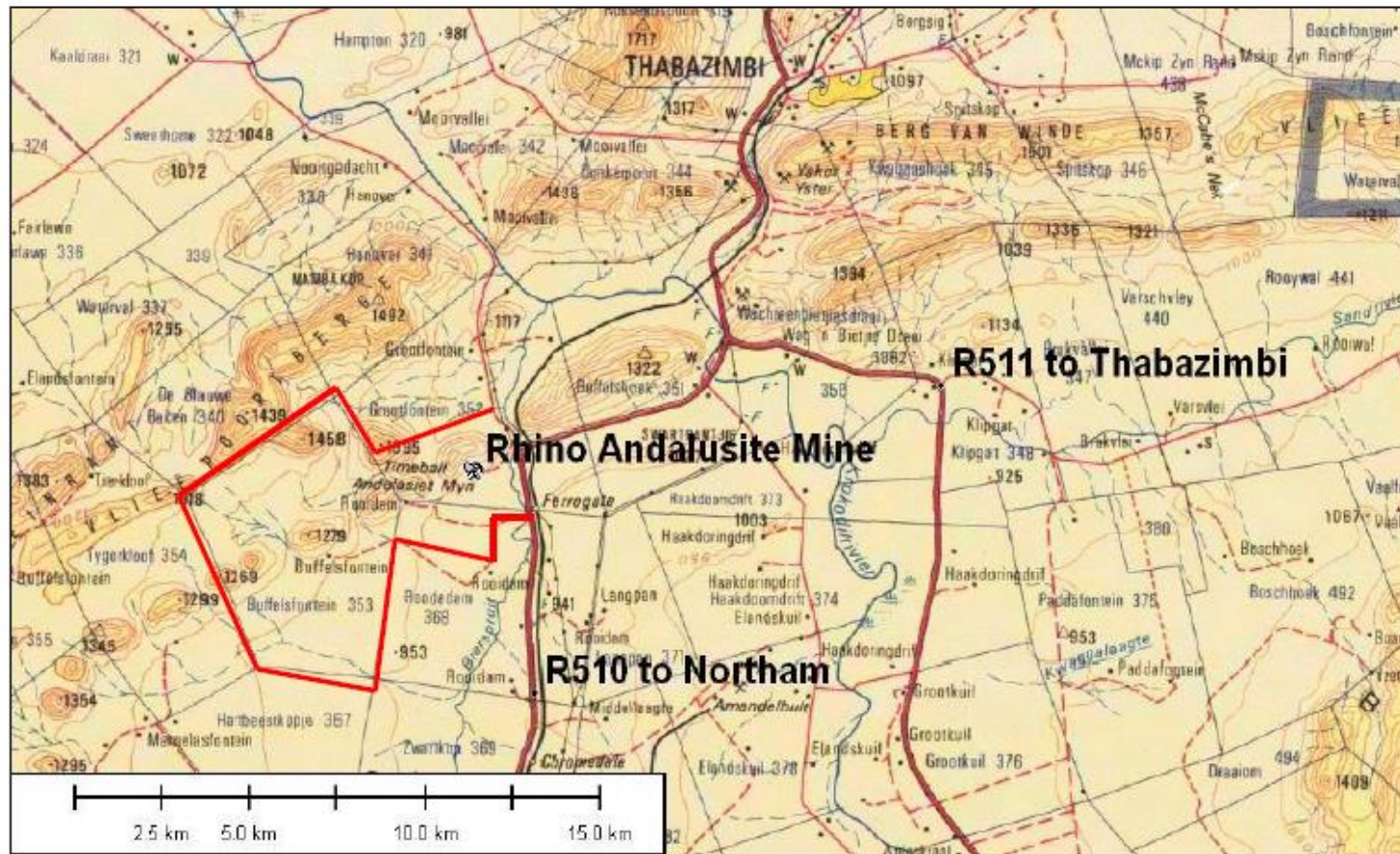
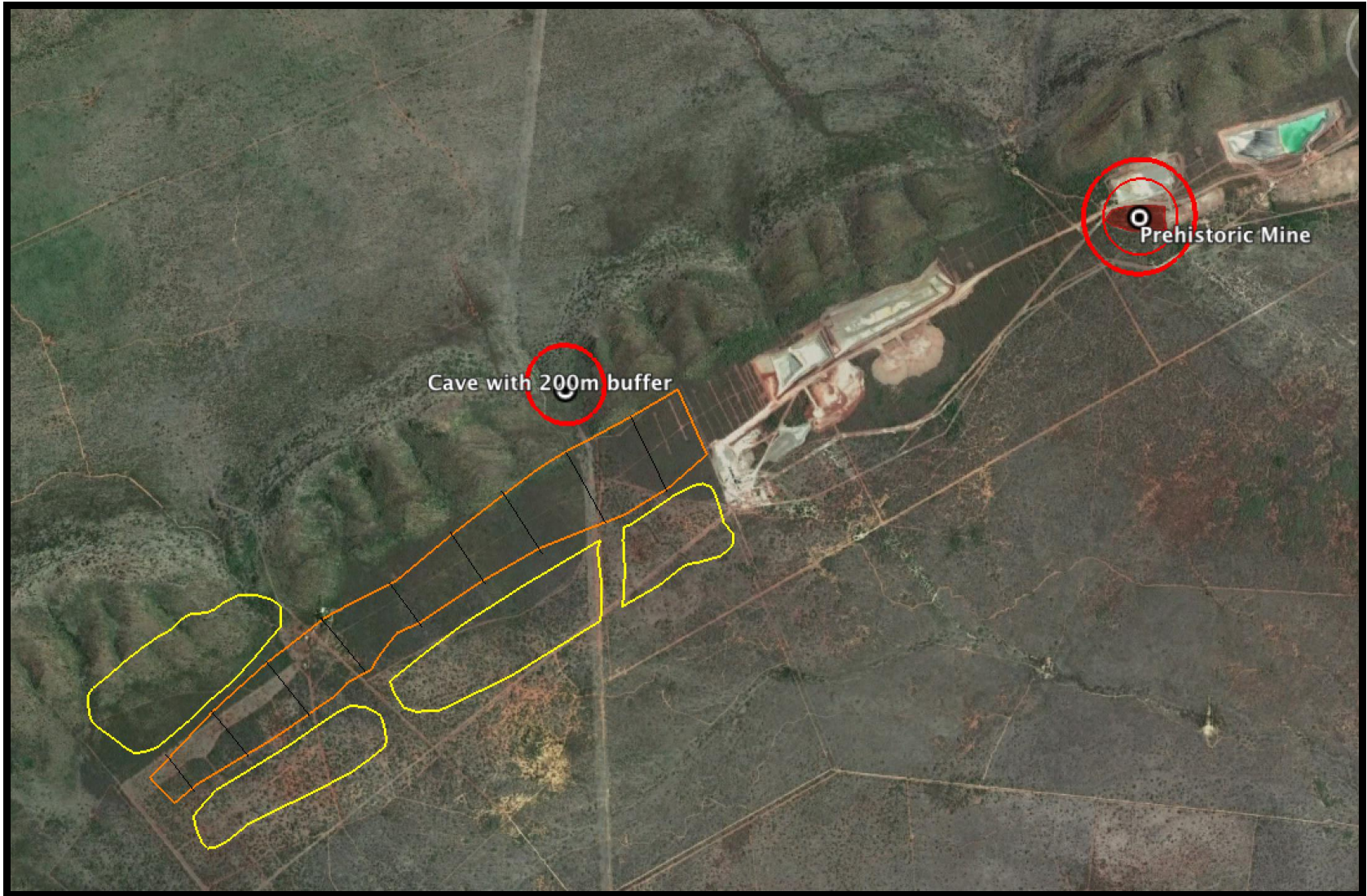
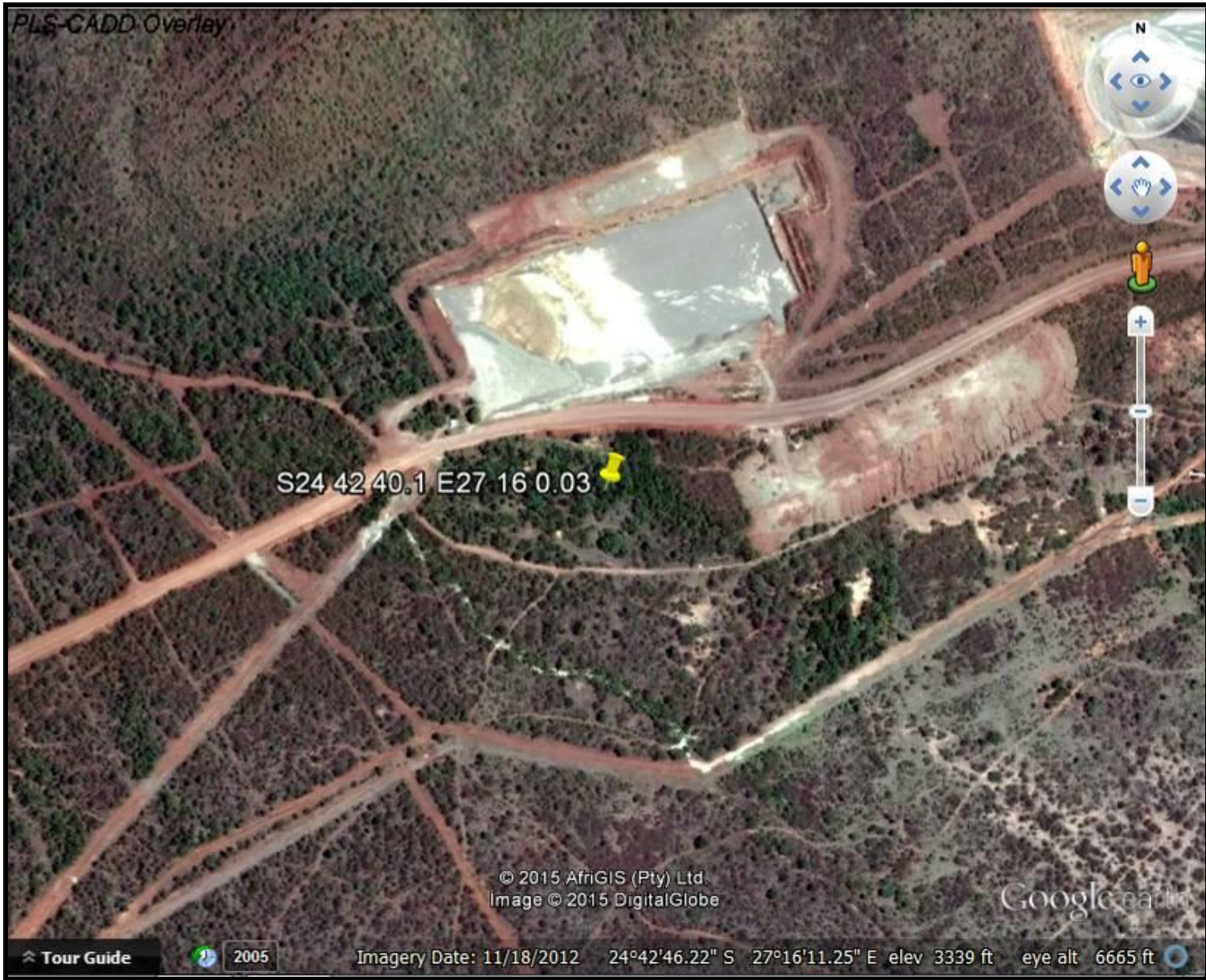


Figure 2: Locality map of already existing RAM (map attached as Addendum 1B) taken from Shangoni Management Services, 2011







50m buffer zone: Any activities in the zone must note the presence of the heritage resource and consider the impact on the resource e.g. emptying of the slimes dam flood the underground mine .

Prehistoric Mine: This is the remaining relatively undisturbed area and must be protected .



Addendum A

Heritage Resources

Activity: Any potential impacts including uncontrolled access to heritage resources or mining activities creeping into in buffer zones

Nature and extent: Permanent and site specific including uncontrolled access to or disturbance of the identified buffer zones, spillage of material, stockpiling, traversing by services, spillage of silt from slimes dams, flooding...

Consequence: In term of the South African Heritage Resources Act, 1999 (Act 25 of 1999) the following applies:

Structures

34. (1) *No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.*

Archaeology, palaeontology and meteorites

35.(4) *No person may, without a permit issued by the responsible heritage resources authority—*

(a) *destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;*

(b) *destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;*

(c) *trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or*

(d) *bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.*

Burial grounds and graves

36.(3) *No person may, without a permit issued by SAHRA or a provincial heritage resources authority—*

(a) *destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;*

(b) *destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or*

(c) *bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.*

Impact phase: Impact can take place throughout the project cycle, pre during and post

Description		Rating before management	Rating with management
Quantity or size of disturbance			
Significant (large)	Heritage Resources are protected as indicated above	3	2
Severity or destruction effect			
Significant (large)	A risk cautious approach must be applied at all times, any disturbance or impact is regarded as significant	3	2
Extent			
Site specific	Site and locality specific	3	2
Duration			
Permanent	Heritage resources are non renewable and all impacts are permanent	3	2
Probability			
Probably	Highly likely, once people know of the resource they tend to want to visit it. Mining activities will likely impact on the resources without constant management	3	2
Reversibility			
Permanent	Once the resources are negatively impacted it is permanent	3	2
Irreplaceability of resources			
Resource is irreplaceable	Access to the site and buffer must be controlled	3	2
Degree to which can be avoided			
Somewhat avoidable with management measures	Impact avoidable with management measures, but must be monitored from time to time	3	2
Significance			
High:	High significance prior to management, and medium significance with management	24	16

Management:

1. General awareness

Heritage awareness must be included in normal site **induction** for all employees, contractors and visitors to the subject properties. This will ensure that the general level of heritage awareness is raised and that there is compliance with the act.

The following sections of the South African Heritage Resources Act, 1999 (Act 25 of 1999) must be highlighted to each visitor, contactor and employee or any other person acting on the sites or immediate surrounds:

In term of the South African Heritage Resources Act, 1999 (Act 25 of 1999) the following applies:

Structures

34. (1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

Archaeology, palaeontology and meteorites

35.(4) No person may, without a permit issued by the responsible heritage resources authority—

(a) *destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;*

(b) *destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;*

Description	Rating before management	Rating with management
<p>(c) <i>trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or</i></p> <p>(d) <i>bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.</i></p> <p>Burial grounds and graves 36.(3) No person may, without a permit issued by SAHRA or a provincial heritage resources authority—</p> <p>(a) <i>destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;</i></p> <p>(b) <i>destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or</i></p> <p>(c) <i>bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.</i></p>		
<p style="text-align: center;">2. General Heritage Management pointers:</p> <ul style="list-style-type: none"> • All actions on the property will be subject to the provisions of the South African Heritage Resources Act (Act 25 of 1999) and any transgressions of the act will make the transgressor liable in terms of the act. • Archaeological deposits can occur below ground level. Should any archaeological artefacts or skeletal material be revealed in the area during construction activities, such activities should be halted, and a university or museum notified in order for an investigation and evaluation of the find(s) to take place (<i>cf.</i> National Heritage Resources Act (NHRA) (Act No. 25 of 1999, Section 36(6)). • Prior to the commencement of any work or action that will impact or effect a heritage resource, the relevant authorization must be obtained from the South African Heritage Resources Agency. • Where there is uncertainty with regard to the status of a heritage resource, object, place or artefact, or any legislative or other policy issue the South African Heritage Resources Agency can be contacted for clarity: <p style="text-align: center;">South African Heritage Resources Agency P.O. Box 2771 CAPE TOWN 8000 Tel: (021) 465 2198 Fax: (021) 465 5789 Email: info@sahra.org.za</p> <p style="text-align: center;">3. Specific Heritage Management pointers:</p>		

Description	Rating before management	Rating with management
<p>The following Heritage Management Actions are required on site :</p> <ul style="list-style-type: none"> • To protect the integrity of the heritage resources it is recommended that the works / mining area be demarcated to limit the footprint of the mining activities and limit creep of activities outside the impact area • During the stripping of topsoil from the mining area a suitably qualified professional must inspect the area for any potential archaeological or heritage resources • Should any archaeological or heritage resources be exposed during the mining activities all activities must be suspended to allow for a investigation by a suitably qualified professional. 		

Addendum B

DECLARATION OF INDEPENDENCE

I, Udo S. Küsel (African Heritage Consultants CC) declare that:

- *I act as the independent specialist in this application to BECS Environmental;*
- *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 no vested financial, personal or any other interest in the application;*
- *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; and*
- *All the particulars furnished by me in this form are true and correct.*

A handwritten signature in black ink, appearing to read 'Udo S. Küsel', with a large, stylized flourish extending from the bottom left.

Udo S. Küsel
20 February 2015