



**Case ID: 19755**

21 July 2023

Natasha Higgitt

Manager

South African Heritage Resources Agency

P.O Box 4637

Cape Town

8001

**Dear Natasha Higgitt**

**Singo Consulting (Pty) Ltd** on behalf of **Kabken Mining (Pty) Ltd** formally request an exemption from conducting the assessment of impacts to heritage resources that complies with Section 38(3) of the National Health Act (NHRA) as required by Section 38(8) of the NHRA and Section 24(4)(b)(iii) of the National Environmental Management Act (NEMA) as part of the Environmental Assessment (EA) process.

Although Singo Consulting (Pty) Ltd understands that assessing the impact on heritage resources is an important part of the EA process and is required by both the NHRA and NEMA, I believe that an exemption is justified in this case for the following reasons:

- As per the results of Screening Tool and SAHRIS PalaeoSensitivity map showing that the area has Low Palaeontological Sensitivity, the proposed activity is unlikely to have any significant impact on archaeological and palaeontological resources (See Appendix 1).
- The proposed prospecting right project area is fully covered with natural vegetation however no signs of Paleontological, Archaeological components or any other Heritage components that were observed during the conducted site assessment
- Given the fact that Prospecting Right is not a complex project and it consists of shorter and small scale activities that will result in impacts that would be easily controlled. It will be highly unlikely for the proposed process to affect any heritage resources even after the prohibitive procedures; alternative measures have been implemented to minimize or mitigate any potential impacts on heritage resources
- A buffer of 200m from any water course and 500m from any wetland areas will be implemented during the the operational phase (See Appendix 2) for an amended borehole map and final sensitivity map for this proposed prospecting right area.



Please note that if any evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit will be alerted as per section 35(3) of the NHRA.

Singo Consulting (Pty) Ltd would like to emphasize that it takes its responsibility to protect heritage resources and comply with relevant legislation very seriously. However, given the circumstances outlined above, we believe that an exemption from the assessment of impacts to heritage resources is appropriate in this case.

Please let me know if you require any further information or clarification in support of our request.

Thank you for your consideration of this matter.

Sincerely,



**Singo Consulting (Pty) Ltd**

**Public Participation Officer**

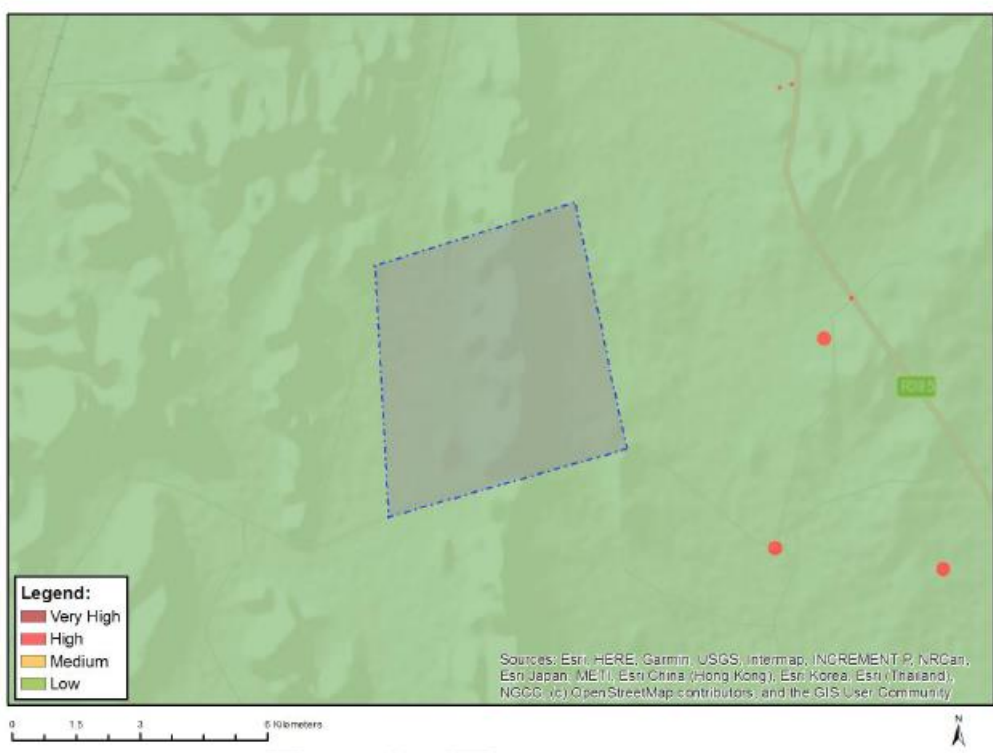
N Dip: Environmental Science  
Office No. 870, 5 Balalaika Street  
Tasbet Park Ext 2  
eMalahleni  
1040  
Tel.: +27 13 692 0041  
Cell: +27 84 948 5793  
Fax: +27 86 5144 103  
Email: ayanda@singoconsulting.co.za



Office 870  
 5 Balalaika Street  
 Tasbet Park Ext 2  
 Witbank

**Appendix 1: Screening Tool**

**MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY**



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

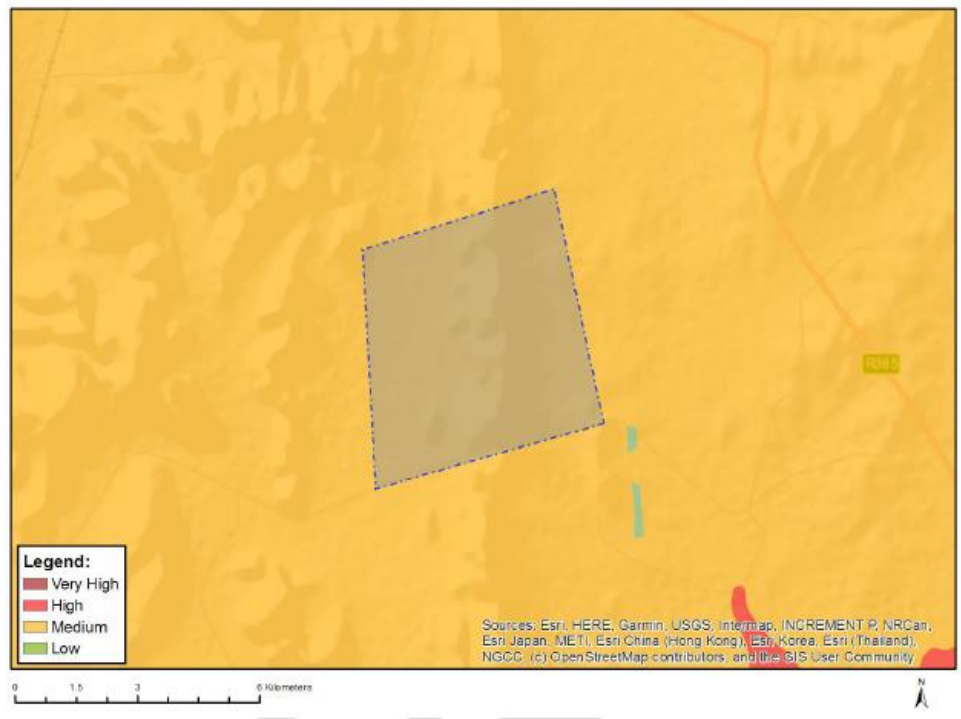
**Sensitivity Features:**

Sensitivity	Feature(s)
Low	Low sensitivity



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MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

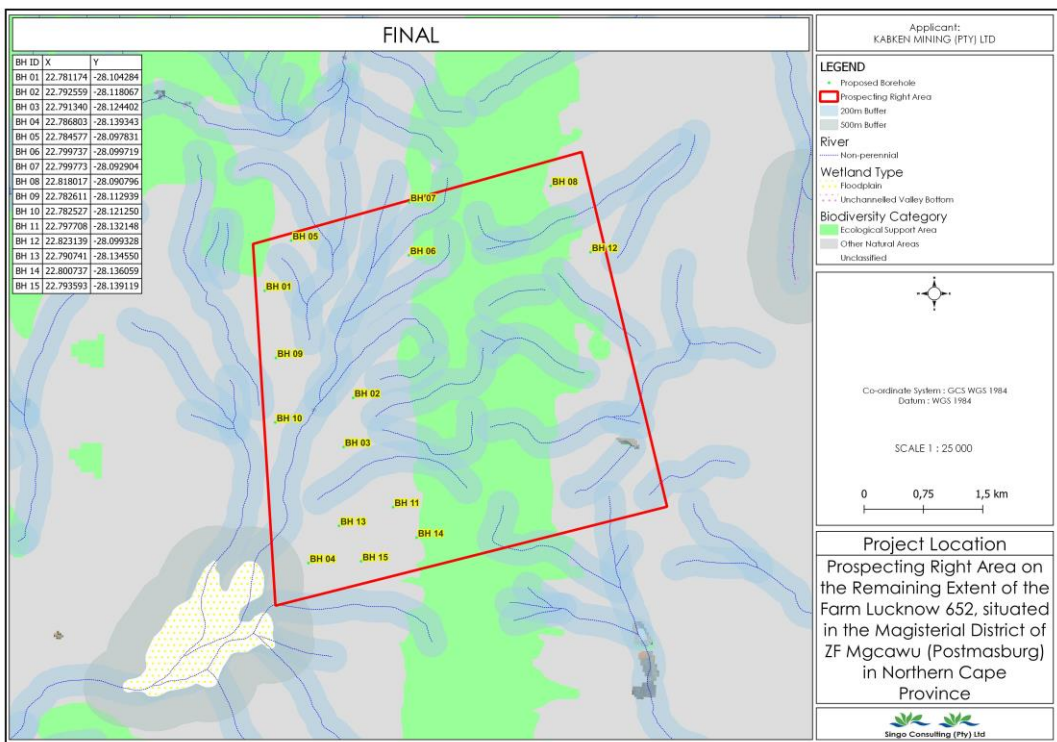
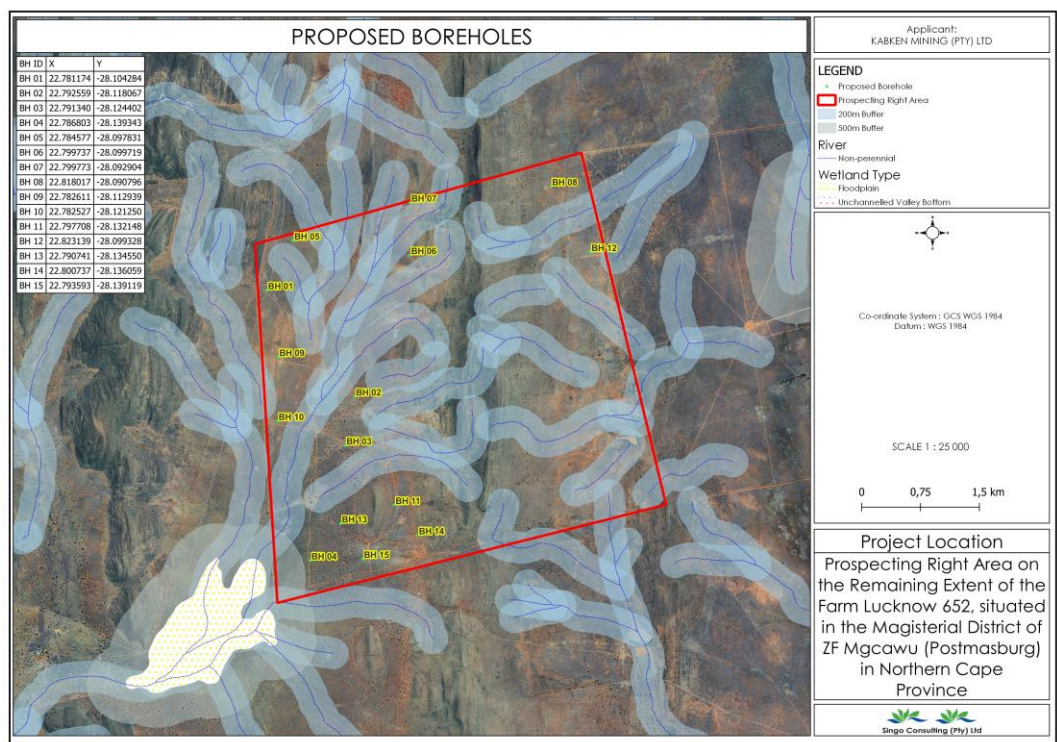
Sensitivity Features:

Sensitivity	Feature(s)
Medium	Features with a Medium paleontological sensitivity



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5 Balalaika Street  
Tasbet Park Ext 2  
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### Appendix 3: Maps





### Appendix 3: PROJECT AREA





# Singo Consulting (Pty) Ltd

To manage & protect the best remaining environment



Office 870  
5 Balalaika Street  
Tasbet Park Ext 2  
Witbank



+27 13 692 0041



+27 78 2727 839  
+27 72 081 6682



kenneth@singoconsulting.co.za



www.singoconsulting.co.za



+27 86 514 4103

