

Environmental Impact Management Services (Pty) Ltd
Registration Number: 1992/005927/07
Directors: T. Nkhahle, A. Smith, L. Whitlow



6 March 2014

Attention Andrew Salomon
Tel: 021 462 4502
Email: asolomon@sahra.org
Case ID 4774

SAHRA Case Reference: 9/2/217/001
EIMS Reference Number: 1002
DMR (GP) 30/5/1/2/2/ (10018MR)

RE: Resubmission of Mining Right Application for the proposed Delf Cullinan Silica Mine

In reference to your letter dated 23rd of February 2014, EIMS wishes to provide motivation for exemption from a specialist palaeontological study.

Motivation for Exemption from specialist Palaeontological Study

As per our telephonic discussion on the 27th February 2014 with Mr Salomon, clarification was provided by SAHRA that a Palaeontological study would not be required if the Palaeo Sensitivity of the project area is of low significance in terms of Palaeontological sensitivity.

EIMS have determined by utilising the Palaeo Sensitivity layer on the South African Heritage Resource Information Systems (SAHRIS) that the project area is indeed of low Palaeontological significance. Further confirmation is provided by the specialist study undertaken by N. Kruger of AGES in 2011 which indicates that no paleontological occurrences are expected to occur in the study area. In light of the above, and considering the nature of the proposed mining activities (sand mining), it is therefore considered highly unlikely that any Palaeontological features will be discovered during the sand mining operation. As such, EIMS respectfully request that SAHRA provide exemption from the requirement for a Palaeontological study for the proposed Delf Cullinan Silica Mine Project.

Notwithstanding the above, please note that appropriate mitigation measures, as suggested by the specialist, have been included in the EMPR. The applicant is required to maintain a watching brief monitoring process throughout the project. In

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the unlikely event that any subsurface Palaeontological material is exposed during construction or mining activities, all activities must be suspended and the archaeological specialist along with SAHRA shall be notified immediately.

We trust you will find the above in order and await your response. Please do not hesitate to contact the undersigned should you have any further comments or concerns.

Kind Regards,
Kelly Nesbitt

