

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



27 February 2014

**Attention Andrew Salomon**  
Tel: 021 462 4502  
Email: [asolomon@sahra.org](mailto:asolomon@sahra.org)

SAHRA Case Reference: 9/2/228/0001  
EIMS Reference Number: 1003

**RE: SAHRA's request for West Wits to undertake an HIA**

In reference to your letter dated 13<sup>th</sup> of February 2014, EIMS wishes to provide motivation for exemption from a Heritage Impact Assessment.

**Motivation for Exemption from specialist Palaeontological Study**

Thank you for your comment requesting that West Wits MLI (Pty) Ltd undertake a Heritage Impact Assessment (HIA) for both the Florida and Roodepoort applications respectively. Your recommendation has been noted and has been forwarded to the client.

However, we would like to take the opportunity to provide you with more detailed information which we believe would exempt the applicant from undertaking a HIA.

Firstly, the proposed prospecting areas are small, the applicant has designed a Prospecting Works Programme (PWP) that aims to utilize borehole drilling, trenching and excavation techniques. The invasive prospecting activities are to be limited to the designated areas indicated on the maps uploaded to SAHRIS. The invasive prospecting work is not scheduled to occur anywhere else on the applications area even though the entire farm portions have been applied for.

At this stage the Roodepoort application is scheduled to have 6 boreholes drilled (at 60° to the north up to a depth of 150 m) and 3 trenches (at 150 m long by 1.5 m wide by 3 m deep) = a total surface area of 375 m<sup>2</sup> to be disturbed. The Florida application invasive prospecting is scheduled to employ excavating and trenching techniques (of 100m by 100 m with a depth of 3 m) = a total surface area of 100 m<sup>2</sup>.

It is vital to remember that these projects are in an already highly disturbed old mine working areas. Any heritage features or artefacts that may have been located within the prospecting area would have already been found or destroyed. However, our EMP will stipulate as a minimum that in the event any artefacts or heritage features are located on site, prospecting will cease and SAHRA will be notified immediately, prospecting will only recommence once SAHRA approves the activities commencement.

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The proposed areas to be disturbed will be stipulated in the EMP which we are busy compiling and are legally binding. The EMP is likely to be completed by the 10<sup>th</sup> March 2014. Once the draft is available we will provide it to SAHRA for comment. Please could you provide your comment by no later than 20<sup>th</sup> March 2014 due to MPRDA stipulated deadlines, for inclusion into our submission to Department of Mineral Resources (DMR).

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

