

**APPENDIX M: HERITAGE EXEMPTION LETTER**



# McGregor Museum

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## Archaeology Department

31 March 2020

The CEO  
South African Heritage Resources Agency  
P.O. Box 4637  
Cape Town  
8000  
Attn: Ms Natasha Higgitt

Dear Natasha Higgitt,

### **Case ID 14694: Gamsberg – proposed new zinc smelter and associated infrastructure: HIA Exemption Letter**

SLR Consulting (South Africa) (Pty) Ltd (P.O. Box 1596 Cramerview 2060), on behalf of Black Mountain Mining (Pty) Ltd, requested that an Heritage Impact Assessment (HIA) exemption be sought in the case of proposed Gamsberg Smelter Project (the Project) and associated infrastructure development at the Gamsberg Zinc Mine.

This letter serves to confirm the following:

- The original 2013 HIA undertaken by Dr David Morris of the McGregor Museum remains pertinent to the Project.
- The area of the proposed smelter and associated infrastructure including a smelter complex footprint, switch yard, powerline and secured landfill facility (Figure 1) falls within the area that was investigated as part of the 2013 HIA (Figure 2). I am confident that the findings made and reported in the 2013 archaeological impact assessment remain valid and that no further HIA would be required for the proposed Project.

Paragraph 5.2.1 of the 2013 report summarises the limited archaeological occurrences observed in the area designated 'North of Gamsberg' (Figure 2). It was noted that: "Survey of land surfaces north of Gamsberg and on the northern slope of the inselberg itself on the farms Gams and Aroams revealed minimal archaeological traces, namely a few isolated stone flakes. Where erosion had cut into the surface there was no indication of any artefacts below the surface there either." Only three specific 'sites' were described, one, north of the proposed development, relating to mid-twentieth century prospecting (NG1), scatters of Ceramic Later Stone Age material around dome-shaped bedrock exposures and water hollows, and grinding hollows on the bedrock, north east of the proposed development, and north of the national road (NG2), and a single isolated Earlier Stone Age cleaver, west of the proposed development (NG3). The vicinity of the proposed zinc smelter and

associated infrastructure development yielded no archaeological traces during surveys reported in Morris (2000)<sup>1</sup> and Morris (2013)<sup>2</sup>.



Figure 1. A. Proposed new zinc smelter complex footprint; B. Switch yard; C. Powerline; D. Secured (preferred) landfill site; E. & F. Non-preferred alternative landfill sites.

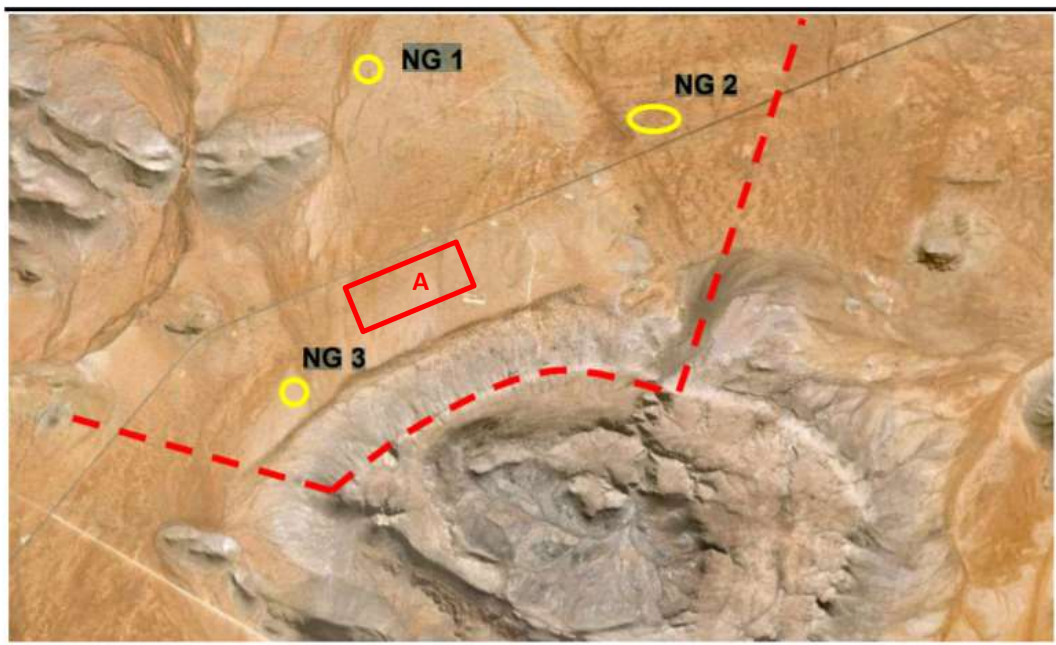


Figure 2. 'North of Gamsberg' archaeological observations (Morris 2013) indicating the location of sites NG1-3 relative to the present project's footprint (red rectangle designated 'A' – see Figure 1).

<sup>1</sup> Morris, D. 2000. Gamsberg Zinc Project Environmental Impact Assessment Specialist Report: Archaeology.

<sup>2</sup> Morris, D. 2013. Archaeological and Cultural Heritage Investigation for the Environmental and Social Impact Assessment (ESIA) for the Gamsberg Zinc Mine and Associated Infrastructure in Northern Cape, South Africa.

Construction and Operational Phase Mitigation: Recommendations as per the Morris (2013)<sup>3</sup> report pertain:

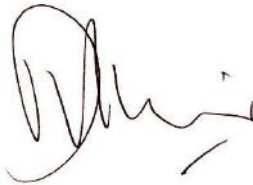
1. Construction phase:

- Minimise the development footprint to only what is actually needed.
- Restrict all construction activities to designated working areas with all work areas and access areas clearly demarcated and signposted.
  - Immediately report any heritage trace that may come to light during the construction phase. (Contact the construction Environmental Control Officer who must report chance finds to SAHRA).

2. Operational phase:

- Restrict operational activities to designated working areas with all work areas and access areas clearly demarcated and signposted.
- Immediately report any heritage trace that may come to light during the operation phase. (Contact the construction Environmental Control Officer who must report chance finds to SAHRA).

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Morris', with a horizontal line underneath.

David Morris  
Head of Archaeology: McGregor Museum

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<sup>3</sup> Morris, D. 2013. Archaeological and Cultural Heritage Investigation for the Environmental and Social Impact Assessment (ESIA) for the Gamsberg Zinc Mine and Associated Infrastructure in Northern Cape, South Africa.

Our Ref:



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Department of Arts and Culture

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CaseID: 14694

Date: Friday February 07, 2020  
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## Interim Comment

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Vedanta Resources

**Proposed new zinc smelter and associated infrastructure to beneficiate the 250 000 to 300 000 tpa of zinc concentrate produced at the Gamsberg Zinc Mine Phase-1 concentrator plant into final metal on the farms Bloemhoek 61 Portion ,Gams 60 Portion 1 & Aroams 57 RE near the town Aggeneys, Khai-Ma Local Municipality, Namakwa District Municipality, Northern Cape Province.**

SLR Consulting has been appointed by Black Mountain Mining (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for the proposed Gamsberg Smelter Project, at the Gamsberg Zinc Mine, Northern Cape Province.

A draft Scoping Report has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will be constructed with the mining area (EA received in 2014) and will include a landfill facility, new 7 km water pipeline, laydown area and contractor camp, new roads and transmission line.

The DSR notes that a Heritage Impact Assessment (HIA) and Palaeontological Impact Assessment (PIA) was conducted as part of the original EA process in 2013, and that the findings of these reports remain valid for the current development application. These reports have been submitted to the SAHRIS application.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that letters from the specialists who drafted the original Heritage Reports be submitted, that motivate the validity of the results of the previous reports to the current development application. These letters must form part of the EIA process of the EA application.

SAHRA will issue further comments upon receipt of the requested letters, Draft EIA and appendices.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

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Department of Arts and Culture

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CaseID: 14694

Date: Friday February 07, 2020  
Page No: 2

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/532468>