

Date: 6 August 2018

Attention: Natasha Higgitt
South African Heritage Resources Agency (SAHRA)
111 Harrington Street
Cape Town
8001

Tel: 021 462 4502
Email: nhiggitt@sahra.org.za

Dear Mrs Higgitt;

RE: INTERIM COMMENT – PROPOSED PROSPECTING RIGHT APPLICATION WITH BULK SAMPLING ON UNSURVEYED STATED OWNED LAND 440MT & 442MT, AREA OF GUMBU/MASISI, MUSINA LOCAL MUNICIPALITY, VHEMBE DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

DMR REF: LP30/5/1/1/2/13050 EM

SAHRA's comment on the on draft Environmental Impact Assessment Report and Environmental Management Programme dated 3 July 2018 for the above mentioned project refers.

We would like to take this opportunity to thank you for taking the time to provide comments on the above mentioned project. SAHRA's comments inclusive of this response from Naledzi Environmental Consultants CC will be submitted to the Department of Mineral Resources for review and decision making.

We herewith would also like to provide some clarification on the project scope. Please note the proposed prospecting and bulk sampling activities will not include a water pipeline as referred to in paragraph two of the SAHRA comment. The prospecting crew will obtain water from existing boreholes in the surrounding villages in agreement with the traditional leadership.

Response to Interim Comment:

Herewith please find attached the amended Heritage Impact Assessment (HIA) Report from Millenium Heritage Group Pty Ltd as requested.

The following recommendations were reached in the revised HIA Report:

- Planning of prospecting sites including the design and siting of access routes must be done where possible to avoid heritage sites. Where this is not possible, proper impact and mitigation studies must be performed as per the requirements of the NHRA of 1999;
- Due to high value of graves, these must be avoided and protected in situ. In cases where it is not possible, it must be exhumed by qualified professionals.
- Should the prospecting programme affect hut floors, great caution is required because previously these were used as burial sites for infants and still born babies in Vha-Venda.

- Consulted heritage records showed that mineshafts were last worked in during 1976. This means that they are not older than 60 years. Based on the provisions of the NHRA, the shafts are very recent and fall outside the protected time bracket;
- **Importantly, based on the above a full heritage including Paleontological Impact Assessment must be conducted should the applicant proceed to apply for a mining license.**
- Should chance finds be recovered in the process of prospecting, work must be stopped immediately. A report must be made to the nearest heritage authority;
- Notwithstanding the limitations of the study, it is recommended that the prospecting be authorised subject to the proviso that a management plan is put in place to minimize unforeseen impacts on the heritage.

We highlight that the community verbally queried the HIA Report and age of the mineshafts at old Gumbu Graphite Mine. They indicated that the shafts could not be older than 60 years as they were last worked on in 1976.

Thank you in advance for your participation.

Regards,



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Also sent to:

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 Eric Mathoho
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