

REF: 230HIA

15 August 2019

Att: Ms Natasha Higgitt

Archaeological Heritage Impact Assessor
South African Heritage Resources Agency
PO Box 4637
Cape Town
8000

By email: nhiggitt@sahra.org.za

Dear Ms Higgitt,

**RECOMMENDATION FOR EXEMPTION FROM HERITAGE AND PALAEOLOGICAL
IMPACT STUDIES: ENVIRONMENTAL AUTHORISATION (EA) AND CLOSURE AND
REHABILITATION OPTIMISATION PROJECT AT THE TSHIPI BORWA MINE, NEAR
HOTAZEL, NORTHERN CAPE PROVINCE - CASEID: 13996**

Your letter dated 30 July 2019 refers.

1. Introduction

As noted in your letter and the submission by SLR Consulting regarding the change in the current closure commitments requires an amendment to the EMPr (**Figure 1**). Considering the proposed changes:

- Concurrent backfill (in-pit dumping) during mining operations only;
- Sloping and rehabilitation of waste rock dumps remaining on surface, concurrent with mining operations;
- Future access to readily available water supply in a pit lake; and
- Optimisation of the surface landforms and partially backfilled pit from a biodiversity, rehabilitation, land use and pollution prevention perspective,

It is evident that the main project component areas have already been assessed and included in previous heritage and palaeontological studies.



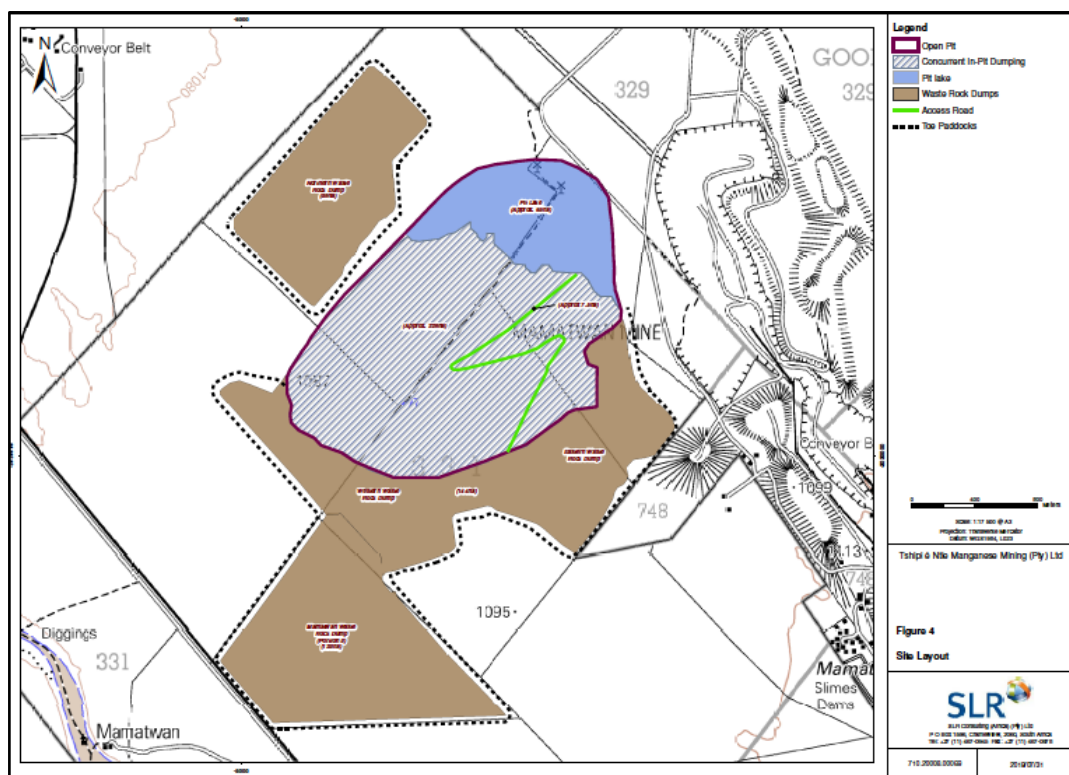


Figure 1 - Proposed closure layout

2. Previous heritage related studies

PGS Heritage and its specialist have conducted numerous HIA and PIA studies for the Tshipi Ntle Mine and surrounds. Listed below an extract of some of the studies conducted.

- 2009 - Heritage Impact Assessment: Ntsimbintle Mining (Pty) Ltd on Portions 1, 2, 3 and 8 of the Farm Mamatwan 331 and the Farm Moab 700 in the Kgalagadi District Municipality of the Northern Cape Province
- 2017 – Heritage Opinion - Heritage Impact Assessment for the Environmental Impact Assessment and Environmental Management Programme Amendment Report for the Tshipi Borwa Mine
- 2018 - Proposed Waste Rock Dump Project at Tshipi Borwa Mine, Near Hotazel, Northern Cape Province. Phase 1 – Heritage Impact Assessment.
- 2019 - Palaeontological Desktop Assessment for the Proposed Waste Rock Dump Project at Tshipi Borwa Mine, Near Hotazel, Sahra CaseID: 12573
- 2019 - Request for exemption from a Heritage Impact Study: Mamatwan Mine Waste Rock Dump Extension, Hotazel, Joe Morolong Local Municipality, Northern Cape Province.
- 2019 - An 18m Wide (On Surface) Boundary Is Located Between The Mamatwan Mine And The Tshipi Borwa Mine. Tshipi and Mamatwan Mine Have Approval to Mine the 18m Wide Boundary Pillar. Additional Capacity Is Required to Store Waste

Rock Generated as part of Mining the Boundary Pillar. To cater for The Additional Storage, it is proposed that the Mamatwan Sinterfontein and the Tshipi eastern waste rock dumps are merged to fill the void between the two dumps. MMT is proposing on amending their approved EMP to cater for the merging of the waste rock dumps- Case Id: 13652

Our studies have concluded that no heritage resources were present in the development of the Tshipi mine and the current expansion into the highly disturbed mine infrastructure as well as the proposed changes to the rehabilitation activities as listed in the EMPr will not have impact heritage resources.

Our palaeontological desktop assessments did however identify the possibility of stromatolites present in the mining area. However, it was rated as having a very low possibility and mining activities will have a low probability of impacting on the palaeontological resources of the area.

3. Conclusions and Recommendations

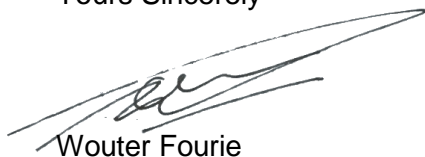
With regard to the proposed process, the following recommendations are made:

1. The findings of the HIAs concluded confirmed that no impacts on heritage resources are foreseen. Our observation and considered opinion on this remains.
2. The palaeontological studies conducted observed that, but it is considered that existing activities at the Tshipi Borwa Mine, near Hotazel, Northern Cape is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area.

It is thus our opinion and recommendation and opinion that the proposed amendments to the EMPr should be exempted from any further heritage or palaeontological studies.

Should you have any queries, please contact Wouter Fourie (email: wouter@pgsheritage.com; Tel: (012) 332 5305).

Yours Sincerely



Wouter Fourie

Accredited Professional Archaeologist (ASAPA)/Accredited Professional Heritage Practitioner (APHP)

PGS Heritage (Pty) Ltd