Background document

ACO Associates has been appointed to examine the following quarries and associated areas:

Core Area 2 - Kalahari Galaxy, Cape Spring, Ivory (1) Yellow, Ocean Green; Core area 1 – (Mining Area A) - Ivory (2), Desert Flame, Cape Autumn, Ocean Blue, Black, Red 1, Red 2, Red 3, Pink.

Some quarries already exist and the application is to extend mining at those sites. Other quarry sites are new and no quarrying has been carried out there before.

Some Archaeological Assessment was previously undertaken by Mr Jayson Orton of ACO Associates in 2012/2013. We note that a number of areas north east of Core Area 2 previously assessed by Orton, are excluded from this application.

The following quarries namely Kalahari Galaxy, Cape Spring, Ocean Green, Ivory (2), Desert Flame, Ocean Blue, Red 2, Red 3, Pink were not previously assessed by Orton while quarry sites Ivory (1) Yellow, Cape Autumn, Black and Red 1 were assessed to some degree

The South African Heritage Resources Agency (SAHRA) previously issued an interim comment based on the Orton 2013 report to Million Rise Trading (Pty) Ltd (Case 4310, 16 January 2014, DMR Ref: NC 30/5/1/1/2/10232 MP).

The interim comment was as follows: "As such, SAHRA agrees with the recommendations of the consultant on page 30 of the submitted report that; "...an impact assessment be carried out for the proposed mining right application and it seems likely, given the peripheral damage that has already resulted, that archaeological mitigation of the identified sites will be required. SAHRA therefore requires that an HIA be completed that assesses the impacts of the proposed mining activities on heritage resources including but not limited to Later Stone Age artefact scatters, lower grindstones and associated deposit, possible and known burials and cairns, as well as stone features and structures older than 60 years. Appropriate conservation management protocols and mitigation proposals must be included in the requested HIA. The HIA must also include a detailed map of the location of the identified heritage resources in relation to the proposed and existing mining activities".

In order to satisfy the SAHRA requirements, and to update the mining area and application referred to in the SAHRA correspondence, ACO Associates will undertake a site visit to assess the existing and proposed quarries in terms of establishing what heritage resources exist at the sites that may be impacted by the activities.

As the activities do not appear to be in Paleontologically sensitive zones, we have provided a letter from a registered Palaeontologist (see in the attached documents) with respect to not requiring a Palaeontological Impact Assessment.

Following the site visit we will compile a Heritage Impact Assessment documenting our findings and including recommendations for mitigation (that will include mitigation already proposed by Orton). We will also compile an integrated Heritage Impact Assessment which will include the summarised findings of an AIA, and that discusses any built environment that may exist in the area.

Mitigation would only be undertaken once the full extent of impacts are established. Permits would be required from SAHRA in order to do mitigation and would be the subject of a separate application in future based on the findings of the forthcoming assessment.