



**SOUTH AFRICAN HERITAGE  
RESOURCES AGENCY**

111 HARRINGTON STREET, CAPE TOWN, 8000  
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DATE: 25 February 2010

ENQUIRIES: Ms Mariagrazia Galimberti  
Archaeology, Palaeontology and Meteorite Unit  
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DME REF: NC 30/5/1/3/3/2/1/1710 EM  
OUR REF: 9/2/008/0001

Ms Margeret K. Swarts  
New site Longlands  
Longlands  
8376

Dear Ms Swarts,

**REQUEST FOR A HERITAGE IMPACT ASSESSMENT: CONSULTATION IN  
TERMS OF SECTION 40 OF THE MINERAL AND PETROLEUM RESOURCES  
DEVELOPMENT ACT, 2002 (ACT 28 OF 2002) FOR THE APPROVAL OF AN  
ENVIRONMENTAL MANAGEMENT PLAN FOR MINING PERMIT ON  
LONGLANDS 250, SITUATED IN THE MAGISTERIAL DISTRICT OF BARKLY  
WEST, NORTHERN CAPE REGION**

We have received notification of your application for an environmental management plan in respect of mining permit for alluvial diamonds. The SAHRA APM unit apologises for the delay in response, and will respond more promptly in the future.

In terms of the National Heritage Resources Act (NHRA), no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that before such sites are disturbed by development it is incumbent on the developer (or mine) to ensure that a **Heritage Impact Assessment** is done. This must include the archaeological component (Phase 1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required.

Although it is stated in section C5 of the EMP form that no graveyards or sites of historical significance are located within a kilometer of the affected environment, no

indication of a professional assessment is given. Also, other categories of possible heritage resources, such as archaeological and palaeontological sites need to be assessed by a specialist. Please also note that **clearing of vegetation and building for access roads may also destroy or damage archaeological and/or palaeontological sites**. Consequently, the quickest process to follow for the archaeological component would be to contract an accredited specialist (see attached accreditation lists) to provide a Phase 1 Archaeological Impact Assessment Report. This must be done before any prospecting drilling, trenching or mining takes place.

The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38 of the NHRA) about the process to be followed. For example, there may need to be a mitigation phase (Phase 2) where the specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of the sites.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter from a Palaeontologist motivating for an exemption is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary (see attached list of accredited Palaeontologists).

Any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewscapes must also be assessed.

Attached please find a list of palaeontological specialists who may be contacted to undertake the necessary palaeontological impact assessment. Please visit [www.asapa.co.za](http://www.asapa.co.za) for a list of CRM archaeologists to undertake the necessary archaeological impact assessment.

Yours sincerely



pp Mary Leslie  
SAHRA: Archaeology, Palaeontology and Meteorite Unit  
For: CHIEF EXECUTIVE OFFICER

Copies: SAHRA Northern Cape  
PHRA Northern Cape  
Mr Muila (DME)

Appendices: List of accredited Palaeontologists  
SAHRA's Mining Pamphlet



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YOUR REF: NC 30/5/1/3/3/2/1/1710 EM  
OUR REF: 9/2/008/0001

Mr Muila  
Department of Minerals & Energy  
Private Bag X6093  
Kimberley  
8300

Dear Mr Muila

**REQUEST FOR A HERITAGE IMPACT ASSESSMENT: CONSULTATION IN TERMS OF SECTION 40 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (ACT 28 OF 2002) FOR THE APPROVAL OF AN ENVIRONMENTAL MANAGEMENT PLAN FOR MINING PERMIT ON LONGLANDS 250, SITUATED IN THE MAGISTERIAL DISTRICT OF BARKLY WEST, NORTHERN CAPE REGION**

Please find attached copy of our letter to Ms Swarts requesting a heritage impact assessment in connection with the above application to the DME.

Many thanks for your co-operation.

Yours sincerely

pp. Mary Leslie

SAHRA: Archaeology, Palaeontology and Meteorite Unit  
For: CHIEF EXECUTIVE OFFICER

Copy: SAHRA Northern Cape  
PHRA Northern Cape