



CTS HERITAGE

Ms N. Higgitt  
SAHRA  
111 Harrington Street  
Cape Town  
09 June 2017

Dear Natasha,

**RE: APPLICATION MADE IN TERMS OF SECTION 38(8) FOR PROSPECTING APPLICATION IN TERMS OF THE MPRDA, NAMAKWALAND, SAHRIS CASE ID 10914**

Many thanks for taking the time to meet with CTS Heritage and Paul Slabbert at the SAHRA offices on Tuesday 6 June. As relayed in this meeting, we have some concerns with regard to SAHRA's response to SAHRIS Case ID 10914.

Firstly, we would like to note the following:

- The prospecting proposed is minimally invasive - only hand and RC drilling are permitted
- The sensitive area close to the shoreline identified in Kaplan's report (2008) will be subject only to hand drilling (300m buffer zone)
- The areas preferentially targeted for prospecting will be those already disturbed by diamond mining as this is the location of the heavy minerals. The prospecting phase will focus on the dumps resulting from diamond mining
- The application does not include bulk sampling, it is therefore regarded as a feasibility exercise collecting samples only and will therefore have a low impact
- The ecological constraints resulted in avoidance of the river riparian zones and intact pristine areas
- The CTS Screener recommended that an HIA be completed prior to the commencement of full scale mining
- Cores will be processed on site. On site processing will allow for the precise geolocation of core samples where sensitive palaeontology might be impacted, affording insight into the location of fossils within sensitive geological strata.
- The anticipated impact to significant archaeological heritage resources is expected to be low, as a result both of the method and location of prospecting, and the generally disturbed environment

Furthermore, SAHRA has requested that site photographs be included in the required HIA. Unfortunately, the inclusion of site photos is not possible due to the tight security constraints in place on site.

With regard to palaeontology, as the study area is already known to include areas of high fossil sensitivity, a field assessment is unlikely to add anything of significance to what we already know of the affected area. While we acknowledge SAHRA's point of view that investigation of modern and ancient watercourses can yield palaeontological material, the provenance of this material would not be as specific as could be ascertained from analysing any fossil material contained in geolocated core samples. In addition, a strict monitoring protocol has been recommended during the prospecting phase.

For these reasons, CTS Heritage requests that SAHRA reconsider their interim comment, and support the call made in the Heritage Screener for a comprehensive HIA only prior to full scale mining activities, rather than the Desktop HIA that has been requested.



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The Heritage Screener submitted provides mapping and thorough analysis of all known heritage resources within, and in the vicinity of, the proposed development area. The Heritage Screener provides the requisite information for inclusion in an HIA in sections 38(3)(a), (b), (c), (f) and (g) of the NHRA, while the results of the BAR provide the information required in sections (d) and (e). Should SAHRA maintain that a Desktop HIA is required, CTS Heritage requests that SAHRA provide clarity regarding what information should be included in the requested Desktop HIA that is not already included in the Heritage Screener.

We are firmly of the opinion that the prospecting phase of this proposed mining activity will have a minimal impact on significant heritage resources however, should SAHRA have information to the contrary, we will gladly comply with all of SAHRA's requirements. We are, further, in full support of the palaeontological aspects being sent for review by professional palaeontological impact assessors, and will, similarly, comply with any recommendations that arise from that process.

Please feel free to contact us should you have any queries or concerns in this regard. We look forward to a response at your earliest convenience.

Kind regards

Katie Smuts  
Jenna Lavin  
Paul Slabbert