

Date: 2016/10/11
Your Reference: CaselD: 4576
Ref: 9/2/074/0001
Attention: Natasha Higgitt
South African Heritage Resources Agency
PO Box 46378
Cape Town, 8001

Dear Natasha

RESPONSE TO INTERIM COMMENT ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORTS
ENVIRONMENTAL ASSESSMENT PROCESSES FOR THE KOLOMELA EXPANSION PROJECT AT THE KOLOMELA MINE, NEAR POSTMASBURG, NORTHERN CAPE PROVINCE

With reference to the interim comments made by the SAHRA Archaeology, Palaeontology and Meteorites (APM) unit on the environmental assessment process for the Kolomela Expansion Project, the following response is given:

(1) Palaeontological Impact Assessment

The requirement for a Palaeontological Impact Assessment (PIA) has already been included in Part B, Section 5.1.9.1 of the Environmental Impact Assessment (EIA) as part of the actions to be undertaken in the Planning & Design/Pre-Construction Phase:

“An accredited palaeontologist must be appointed to do a Phase Palaeontological Impact Assessment (PIA) to confirm the presence of significant fossils of stromatolites and possible cave breccia deposits in areas underlain by dolomite of the Ghaap Group, as well as areas underlain by surface limestone, where these limestones are exposed or where they are planned to be exposed during mining operations. The palaeontologist must make the necessary recommendations regarding a possible Phase 2 PIA during the initial mining operations.”

The PIA will be completed in the first quarter of 2017 and will be forwarded to SAHRA APM for comment. The competent authority will be requested to include this as a condition of the authorisation.

(2) Permits in terms of section 35 of the National Heritage Resources Act are to be applied for sites KOL1, KOL3, KOL5, KOL6 and KOL7 prior to construction.

This requirement for permits has not been specifically included in the Environmental Management Programme (EMPr) and the final EMPr will be updated to include this and/or the Competent Authority will be requested to include this as a condition of the authorisation.

(3) Phase 2 mitigation to be undertaken for Site KOL3.

KOL3 will not be destroyed by the development and a Phase 2 excavation is thus not necessary at this stage. A 400 m buffer has been maintained for the site. Refer to Part A, Section 8.3.8 and Figure 8.3.8 which refers to the revised layout to avoid the site.

(4) Phase 2 representative sampling to be undertaken for KOL5, KOL6 and KOL7.

The requirement for Phase 2 mitigation is included in the Part B, Section 5.1.9.1 of the EIA reports:

“Phase 2 mitigation (sampling) of a significant number of pans is to be undertaken in areas where such pans containing artefacts are to be destroyed by mining activities. This will require a permit issued by the South African Heritage Resources Agency (SAHRA) (African Heritage Consultants 2011:20).”

(5) Amendments to the KKS Waste Rock Dump and the Aquifer Recharge Project for the Protection of KOL4

The layout of the KKS waste rock dump and the Aquifer Recharge Project Infrastructure has been amended in accordance with the recommendations set out in the Heritage Impact Assessment. The revised layout is included in the reports. Refer to Part A, Section 8.3.8 and Figure 8.3.8.

(6) Should archaeological sites or remains, fossils or other categories of heritage as well as graves be unearthed, the relevant department of SAHRA is to be notified. Phase 2 recuse is to be carried out, if required.

This commitment is included as Action 8.5.13 of the existing Kolomela Mine EMPr, which is referenced as being application under Part B, Section 5.2.9.2 and 5.2.9.3. of this amendment. The existing condition has been expanded to include:

“If an unknown grave or artefact is unearthed during earthworks reasonable measures are to be implemented to prevent damage to the artefact or grave. Work is to be stopped and the Kolomela Environmental Manager notified. Works is only to proceed on instruction of the Kolomela Environmental Manager.

The Environmental Manager must be informed of the possible presence of fossils. If fossils are observed, the Environmental Manager must be notified and the fossils recorded by the palaeontologist according to SAHRA specifications.”

(7) The final EIA/EMPr and all appendices will be submitted and uploaded to the case file once authorisation has been received from the Competent Authority.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kerry Fairley'. The signature is fluid and cursive, with the first name 'Kerry' written in a larger, more prominent script than the last name 'Fairley'.

Kerry Fairley

Environmental Assessment Practitioner

Kolomela Expansion Project

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On behalf of Synergistics Environmental Services