

**Umlando: Archaeological Surveys &
Heritage Management**

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8 April 2013

Re: Blanket permit application

Attention Bernadet Pawandiwa

Hi Bernadet

Thank you for the feedback regarding our permit application regarding RBM Zulti North. We did not insert a reason for the blanket permit since the RBM archaeological permit has been a blanket permit since it was first issued in 1995. We have also spoken to Amafa KZAN about this during the last two permit applications and had thought that this was by now sorted out. Nonetheless, here are the reasons for a blanket permit:

1. We record at least two sites per month in the dune system, sometimes more than five, of which 90% get sampled. Sampling happens immediately as the site will either be mined or cleared shortly after its recording due to the nature of mining. Permit applications for every site will thus be cumbersome.
2. Due to the nature of mining activity, that cannot be stopped, we need to sample and/or excavate sites immediately, and cannot be delayed by permit applications.
3. Most of the human skeletal remains are over 100 years in age. When these are uncovered, it is normally due to bush clearance, mine face slumping, or similar mining activity. Only on a few occasions are human remains found in an excavation. These remains need to be removed immediately, normally within 24 hours of being notified by RBM. If they are not removed, they would be lost due to the nature of mining activity and movement of dune sands. Even demarcation does not assist entirely, as sand movement in high winds could remove the signage/demarcation.
4. Human remains less than 60 years old would be treated in a different manner as per legislation. Remember that the area was cleared for afforestation in 1940 and we thus have a relatively set date for minimum ages of human remains. The SOP5 for RBM, produced by Umlando and RBM in the early part of the 2000s has set out the process of

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- how to deal with human remains that may be claimed by the community. Amafa is familiar with the SOP5.
5. Permit applications for large scale mining sites such as these are best dealt with as a blanket permit due to the number of sites recorded per annum, and excavated/sampled. Applying for a permit for each site will be cumbersome, and the site would have been removed by the time a permit is given.
 6. Our monthly and annual reports list each site in detail, as well as providing site record details, photographs, and a list of diagnostic artefacts. These are also placed on a spreadsheet and handed to RBM on an annual basis, as it was with Amafa KZN prior to SAHRIS. These reports clearly show that sites are not missed or omitted from surveys, and that our work meets the basic requirements of AIAs.

Your sincerely

A handwritten signature in black ink, appearing to read 'Gavin Anderson'. The signature is stylized with a large, sweeping initial 'G' and 'A'. Below the signature, there are two short horizontal lines.

Gavin Anderson