

**Our Ref:**



an agency of the  
Department of Arts and Culture

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CaseID: 12324

Date: Thursday April 26, 2018  
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## **Interim Comment**

### **In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Mr Sechaba Letaba  
Assmang Ltd - Manganese Black Rock Mine Operations  
P O Box 187  
SANTOY  
8491

### **Assmang Black Rock Mining Operations, Northern Cape has applied for amendment of their EMPR which was approved by the DMR:NC30/5/1/2/3/2/1/203MR**

EScience Associates (Pty) Ltd were appointed by Assmang (Pty) Ltd – Black Rock Mine Operations (BRMO) to conduct an updated Environmental Management Programme (EMPr) for the Black Rock Mine Operations near Hotazel, Northern Cape Province. Black Rock Mine Gloria complex has been in operation since 1975, while the Nchwaning II and III complexes have been operational since 1981 and 2004 respectively. Authorised planned activities incorporated into the updated EMPr include expansion of the mines manganese production capacity through provision of facilities and activities such as new mine shafts, head gear and winder house, processing facilities, access roads, conveyor, workshops etc. Additional planned authorised activities include a sinter plant complex, product stockpile floors, tailing storage dams (TSF), sewage treatment plant, bulk fuel storage, salvage yard and waste storage, water storage and treatment, borrow pit establishment, and a railway upgrade.

The EMPr noted a Heritage Impact Assessment (HIA) conducted in 2011 that identified Stone Age sites, and an old railway bridge and provided recommendations for mitigation, however the HIA has not been submitted as part of the application. Additionally, it is noted on page 122 of the EMPr that the mine works at the Black Rock Koppie may be considered as a heritage site. It is recommended in the EMPr that BRMO must establish whether the site must be declared and managed as such, or whether rehabilitation may proceed. It is further noted that the EMPr Amendment Authorisation granted on the 13/02/2018 notes the above as one of the conditions of approval (Condition 4a).

In an Interim Comment issued on 05/04/2018, SAHRA requested the following information:

- The HIA conducted in 2011 must be submitted to the case application;
- All EMPr appendices must be submitted to the case application;
- And clarity is sought in the form of a HIA regarding the significance of and the impact to the historical



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BRMO operations as noted on page 122 of the EMPr.

*Küsel, U. 2009. Cultural Heritage Impact Assessment of Manganese Mining Areas on the farms Belgravia 264, Santoy 230, Gloria 226 and Nchwaning 267, at Black Rock, North of Kuruman, Kgalagadi District Municipality, Northern Cape Province.*

A total of four heritage resources were assessed as part of the 2009 study for the previous revision of the EMPr. These include two cemeteries, one Stone Age site and the historical Black Rock Mining works.

Recommendations provided in the report included the following:

- The cemeteries should be maintained;
- A Watching Brief is recommended for the Stone Age site;
- No development, mining or quarrying should take place within 100 m from the middle of the Ga-Mogare River;
- If any development should take place in the 100 m zone, a full phase 2 Archaeological assessment must be undertaken;
- Declared the historical Black Rock Mine a National Heritage Site;
- The original mine be made assessable to the public;
- The history of the mine and its structures be fully documented in a Phase II cultural heritage resources impact assessment;
- A heritage management plan be compiled for the original mine;
- Geological specimens of associated mines be collected, preserved and exhibited in a mine building converted into a safe place as a museum. This exhibition facility can also exhibit the Stone Age and mining history of the area.

*Pelser, A. J and Van Vollenhoven, A. C. 2011. A Report on a Heritage Impact Assessment (HIA) for a Proposed New Rail Crossing over the Gamagara River for the Gloria Mine Operations, Assmang Black Rock, on Gloria 266, north of Hotazel, Northern Cape.*

A total of 15 heritage resources were identified within the then proposed rail crossing development area including 14 Early Stone Age (ESA), Middle Stone Age (MSA) and Later Stone Age (LSA) lithic scatters and a rail bridge.

Recommendations provided in the report included the following:

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- A Phase 2 mitigation be undertaken on some of the identified Stone Age sites, inclusive of mapping and controlled sampling;
- Care should be taken during development activities that if any historical sites, features or artifacts are accidentally discovered, a qualified archaeologist be called to investigate.

### Interim Comment

A previous SAHRIS application regarding the previous EMPr revision (SAHRIS Case ID 807 - <http://sahra.org.za/sahris/cases/nchwaning-emp-203>) has reference. A letter issued on the 13/03/2013 notes the following outstanding matters:

- *Given the historical significance of the site, the original Black Rock Mine, it should not be disturbed by the development and the mining. An application may be presented to apply for declaring the site National Heritage and the boundaries of this explored during the declaration process;*
- *No development or mining may occur within 100 m distance from the centre of the Go-Mogara river. If this is absolutely necessary, then a complete Phase II must be carried out. Mitigation in the form of systematic excavation and sampling must be undertaken before trenching and any other earth-moving activity resulting from this proposed project. A photographic record must be established immediately before, during and after mitigation. The archaeologist will require a mitigation permit from SAHRA in terms of s. 35 of the National Heritage Resources Act (Act 25 of 1999). On receipt of a satisfactory mitigation (Phase 2) permit report from the archaeologist, SAHRA will make further recommendations in terms of the report such as its final destruction or additional sampling;*
- *Site 6 must be properly mapped and recorded; SAHRA requires that, in terms of s. 38(4)(b&c) of the National Heritage Resources Act, the provisions of s. 35 apply as appropriate and a collection permit be submitted;*
- *It is noted that two grave sites were identified. The SAHRA Burial Grounds and Graves Unit supports the continued protection and management of the two graveyards and notes that any proposed declaration of the mine as a heritage site at any level should include the protection, management and interpretation of the two graveyards (especially the mineworkers' cemetery);*
- *A Palaeontological Study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary.*

It must also be noted that the recommended Heritage Management Plan (HMP) is also outstanding as per the recommendations of the 2009 report.

# Assmang Black Rock Mining Operations, Northern Cape: Notification of Updated EMPR

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Therefore, SAHRA awaits the requested information and studies as noted as part of the previous EMPR revision to be completed before further comments can be issued.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/488845>  
(DMR - NC, Ref: NC30/5/1/2/3/2/1/203MR)