



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 14694

Date: Thursday October 29, 2020
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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Vedanta Resources

Proposed new zinc smelter and associated infrastructure to beneficiate the 250 000 to 300 000 tpa of zinc concentrate produced at the Gamsberg Zinc Mine Phase-1 concentrator plant into final metal on the farms Bloemhoek 61 Portion ,Gams 60 Portion 1 & Aroams 57 RE near the town Aggeneys, Khai-Ma Local Municipality, Namakwa District Municipality, Northern Cape Province.

SLR Consulting has been appointed by Black Mountain Mining (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for the proposed Gamsberg Smelter Project, at the Gamsberg Zinc Mine, Northern Cape Province.

A draft Scoping Report has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will be constructed with the mining area (EA received in 2014) and will include a landfill facility, new 7 km water pipeline, laydown area and contractor camp, new roads and transmission line.

The DSR notes that a Heritage Impact Assessment (HIA) and Palaeontological Impact Assessment (PIA) was conducted as part of the Mine EA process in 2013, and that the findings of these reports remain valid for the current development application. These reports have been submitted to the SAHRIS application.

In an Interim Comment issued on the 07/02/2020, SAHRA requested that letters from the specialists who drafted the original Heritage Reports be submitted, that motivate the validity of the results of the previous reports to the current development application. These letters must form part of the EIA process of the EA application.

Since the issuing of the Interim Comment, the specialist letters have been submitted to the case (01/10/2020) along with the EIA documents.

Pether, J. 2020. Letter of Recommendation for Exemption from further Palaeontological Studies: Proposed New Zinc Smelter and Associated Infrastructure at Gamsberg Zinc Mine.



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The specialist confirmed that the results of the 2013 report remain valid i.e. the proposed development footprint is underlain by unfossiliferous Bushmandland Group bedrock and later Quaternary deposits that do not preserve fossils well. A Fossil Finds Procedure is recommended to be incorporated into the Environmental Management Plan.

Morris, D. 2020. Case ID 14694: Gamsberg – proposed new zinc smelter and associated infrastructure: HIA Exemption Letter.

The specialist confirmed that the results of the 2013 report remain valid. No archaeological resources were identified within the vicinity of the Gamsberg Smelter project site. Recommendations provided include a Chance Finds Procedure.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EIA and EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No additional specific conditions are provided for the development;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional

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archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

- The Final EIA and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/532468>

Terms & Conditions:

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1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.