

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 15118

Date: Monday August 17, 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: Mr Markus Schaefer
Vedanta Resources

Environmental Impact Management Services (Pty) Ltd (EIMS) has been appointed by Black Mountain Mining (Pty) Ltd – hereafter referred to as the applicant – to prepare and submit a Basic Assessment Report (BAR), Environmental Management Programme (EMPR), as well as an Integrated Interested and Affected Party (I&AP) Consultation process, in support of a prospecting right application and Environmental Authorisation. The prospecting right application will be undertaken in accordance with the requirements of the Minerals and Petroleum Resources Development Act (Act 28 of 2002, as amended) (MPRDA) and the associated regulations, and the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the associated regulations, and has been lodged at the Department of Mineral Resources (DMR) – Northern Cape. The applicant, Black Mountain Mining (Pty) Ltd, is applying for a prospecting right application in order to ascertain if economically viable mineral deposits exist within the application area for the following: Ferrous & base metals (Copper, Iron, Lead, Zinc, Manganese, Nickel, Molybdenum) and all associated metals and minerals, precious metals (Gold, Silver) and all associated metals and minerals. Both non-invasive and invasive prospecting techniques will be utilized. The Koa South Application Area covers an area of approximately 9234.1442 hectares. The area is located approximately 77,3 km South-West of Prieska and 166 km North-West of De Aar, Pixley Ka Seme District in the Northern Cape Province. The application area includes portions 1 and 2 of the Farm Kalkfontein A 131 and portions 3 and 4 of the Farm Roode Draai 134. Die geographical centre point of the proposed project area is: 30°19'38.77" S and 22°36'17.72" E The application for a prospecting right and environmental authorisation process will be carried out as stipulated in Section 16 of the MPRDA and Chapter 4 of the Environmental Impact Assessment (EIA) Regulations, 2014 (GNR 326) promulgated under the NEMA.

Environmental Impact Management Services (Pty) Ltd has been appointed by Black Mountain Mining (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on the portions 1 and 2 of the Farm Kalkfontein A 131 and portions 3 and 4 of the Farm Roode Draai 134, near Vosburg, Northern Cape Province (NC30/5/1/1/2/12541PR).

A Basic Assessment Report (BAR) process will be followed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations for activities that trigger the Mineral and



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Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed prospecting right application area will cover 9234.1442. The DBAR has not been submitted to the SAHRIS application.

Banzai Environmental (Pty) Ltd and PGS Heritage (Pty) Ltd have been appointed to provide heritage specialist input as part of the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) and 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Butler, E. 2020. Palaeontological Desktop Assessment for Black Mountain Koa South Prospecting Right Application without Bulk Sampling in the Northern Cape.

The proposed prospecting area is underlain by basement bedrock of the Bushmanland Group, igneous Karoo Dolerit, Prince Albert, White Hill and Volksrust formations with Quaternary to recent aeolian sediments of the Gordonia Formation. The White Hill Formation has a very high sensitivity known for fossil remains such as insects, trace fossils, petrified wood, sparse vascular plant remains, and mesosaurid reptiles. Prince Albert and Volksrust Formations have a high sensitivity which are known to contain plant fossils, insects, spores and invertebrates, while the Gordonia formation sediments are of moderate sensitivity. The remaining formations are not sensitive for palaeontological resources.

A Chance Fossil Finds Procedure is recommended and provided in the report.

Kitto, J. 2020. Heritage Impact Assessment: Koa South Prospecting Right Application for Black Mountain Mining, Northern Cape Province.

A summary of this report will not be discussed below as the report is still in draft with review comments visible within the report.

In an Interim Comment issued on the 27/05/2020, SAHRA requested that the HIA be finalised and that the DBAR and appendices be submitted for review.

Since the issuing of the Interim Comment, a finalised HIA has been submitted, along with the DABR and appendices.

Kitto, J. 2020. Heritage Impact Assessment: Koa South Prospecting Right Application for Black Mountain Mining, Northern Cape Province.

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The desktop HIA found that heritage resources such as archaeological artefact scatters and rock art sites may be located within the proposed development area, a low possibility for burial grounds and historical structures.

Recommendations provided in the report include the following:

- Any identified historical structures should be avoided with a buffer of 30m to avoid damage during the prospecting activities;
- When physical prospecting is planned an archaeologist must first visit and assess the areas of impact and make recommendations on any finds made;
- If any archaeological artefacts are discovered during any phase of the proposed prospecting activities, the Chance Find Protocol must be implemented by the ECO in charge of these developments;
- In the event that heritage resources are discovered during site clearance or prospecting activities, such activities must stop and a qualified archaeologist must be appointed to evaluate and make recommendations on mitigation measures.

The DBAR notes that the EA process was undertaken during the national lockdown period during the State of Disaster due to COVID-19. A total of 10 boreholes will be drilled with a footprint of 300m² each, with a 5km access route.

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 BAR and EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- A site visit must be conducted by an archaeologist once the location of the boreholes and the access route has been finalised. A report on the result of the assessment must be submitted to SAHRA prior to construction for review and comment. No construction may occur without comments from SAHRA in this regard;
- 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

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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 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 BAR 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

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/537126>
(DMR - NC, Ref: NC30/5/1/1/2/12541PR)

Terms & Conditions:

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.