

Our Ref:



an agency of the
Department of Arts and Culture

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CaseID: 15223

Date: Wednesday March 31, 2021
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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: Willie Oosthuizen
Wadala Mining and Consulting Pty Ltd

Opencast mining for Diamonds

Wadala Mining and Consulting Pty Ltd has been appointed by Roodam Plaas (Pty) Ltd to conduct an Environmental Authorisation Application in support of a Mining Right Application for proposed mining activities on portion 1 and remaining extent of the farm Roodam 101, near Kimberley, Northern Cape Province (NC 30/5/1/2/2/10157 MR).

A Scoping Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed mining right application area covers 1 934.8367 ha with activities that will include strip mining with infrastructure such as a processing plant, conveyor belt, topsoil stockpiles, fuel storage tanks, mine residue dam, office complex, temporary workshop facilities, storage facilities, ablution facilities, water tanks and overburden stockpiles.

Dr Lloyd Rossouw was appointed to provide a heritage specialist input as part of the EA application in terms of section 24(4)b(iii) of NEMA and section 38 of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Rossouw, L. 2016. Phase 1 Heritage Impact Assessment of the farm Roodam 101, near Windsorton, Northern Cape Province.

The submitted report assessed the development area for a prospecting application. As part of the assessment, two specific areas were assessed i.e. Area 1 and Area 2. Area 1 is underlain by Ventersdorp andesites. One Later Stone Age core was identified. The Koranna mission station is located 700 m from the study area. Area 2 is underlain by cobble grade conglomerate and has been degraded by previous prospecting activities. A large rectangular stone-walled structure was identified on the riverbank, and circular stone walled structure was identified higher up, 650 m west of the riverbank. No fossil heritage was identified.

Recommendations provided in the report include the following:



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- The graves and structural remains of the Koranna Mission Station be fenced off and avoided;
- A 10 m wide buffer zone to be adhered to around the two stone walled structures in Area 2;
- A Chance Fossil Finds Procedure be implemented.

In an Interim Comment issued on the 31/07/2020, SAHRA requested that an application specific HIA be conducted for the Mining Right application. Since the issuing of the Interim Comment, an HIA and PIA have been uploaded to the application, including the EIA (uploaded on the 08/03/2021).

Bamford, M. 2020. Palaeontological Impact Assessment for the Roodam 101 PR Application, near Windsorton, Barkly West District, Northern Cape Province.

**It must be noted that the Mining Right application footprint is located in an area of low palaeontological sensitivity as per the PalaeoSensitivity map on SAHRIS, and therefore no palaeontological studies were required for this application, however a Chance Finds Protocol is required.*

The specialist report notes that the development footprint is located in an area of low palaeontological sensitivity as the underlying rocks comprise the volcanic Allanridge formation which do not contain fossils. Recommendations provided in the report include that if transported fossils are found, they should be rescued, and a palaeontologist called to assess and collect a representative sample.

Matenga, E. 2020. Heritage Impact Assessment and Palaeontological Desktop Assessment for a Prospecting Right Application on the Remaining Extent of the Farm Roodam 101 and Portion 101/1 of the Farm Roodam near Windsorton, Barkly West District, Northern Cape Province.

A total of eight heritage resources were identified as part of the specialist's report. These include four Stone Age surface lithic scatters, one cattle enclosure site, one foundation, one rectangular stone walled structure and the graves and remains of the old Morija Mission station.

Recommendations provided in the report include the following:

- Site RDM04 must be fenced off and a 10 m buffer maintained around the site;
- The graves and remains of the old Morija Mission Station must be fenced off and a 100 m buffer maintained around the graves;
- If archaeological or other heritage relics are found during the construction phase, heritage authorities

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will be advised immediately, and a heritage specialist will be called to attend.

It must be noted that both specialist reports did not seem to take into account the Interim Comment and assessed prospecting activities, and not mining right activities as stated in the EIA.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot endorse this proposed development and advises the Department of Mineral Resources and Energy (DMRE) to reject the application for Mining Rights activities on portion 1 and remaining extent of the farm Roodam 101, near Kimberley, Northern Cape Province (NC 30/5/1/2/2/10157 MR) as the activities described in the EIA have not been assessed as part of the specialist reports. The specialist reports assessed the impacts of the previous a prospecting rights application which was highlighted in the Interim Comment.

This comment must be forwarded directly to competent authorities and proof of the submission and receipt thereof must be provided to SAHRA.

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

**Mining Right for Diamonds by Roodam Plaas (Pty) Ltd with opencast mining.
(NC 10157 MR)**

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/537832>