

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Natasha Higgitt
Tel: 021 462 4502
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CaseID: 15223

Date: Monday May 16, 2022
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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).

In a Final Comment issued on 31/03/2021, SAHRA objected to the proposed development as the submitted heritage reports had not assessed the mining activities as presented in the EIA documents (<https://sahris.sahra.org.za/node/564537>).

Since the issuing of the Final Comment, a new Heritage Impact Assessment (HIA) and Palaeontological Impact Assessment (PIA) have been submitted for review (11/04/2022).

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. 2022. Heritage Impact Assessment and Palaeontological Desktop Assessment for a Mining 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.

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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 on page 24 include the following:

- Site RDM04 must be fenced off and a 30 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 will be advised immediately, and a heritage specialist will be called to attend.

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 and Burial Grounds and Graves (BGG) Unit objects 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 Heritage Management Plan (HMP) must be developed for the on-going management of site RDM04 and the graves and remains of the old Morija Mission Station. The HMP must be submitted to SAHRA for review and approval prior to the construction phase;
- 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/ Ngqabutho Madida 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

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- 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA with regards to offences;
 - 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 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

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

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ADMIN:

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

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.