

**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  
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CaseID: 15370

Date: Friday April 22, 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: United Manganese of Kalahari (Pty) Ltd

**United Manganese of Kalahari (Pty) Ltd (UMK) is an opencast manganese mine located on farm Botha 313, the remaining extent (RE) of the lies on farm Smartt 314, and portion 1 and RE of the farm Rissik 330 near Hotazel in the Northern Cape Province and lies directly adjacent and to the west of the R380 provincial road. UMK currently holds the following authorisations: • A mining right (30/5/1/2/3/2/1(113) MR) issued by the Department of Mineral Resources and Energy (DMRE); • An Environmental Management Programme report (EMPr) approved by DMR; • Environmental Authorisations (NC/KGA/HOT7/15/2006 & NC 30/5/1/2/2/113 MR) issued by the Department of Environment and Nature Conservation (DENC) and the DMR respectively; and • A Water Use License (IWUL) (10/D41K/ABEGJ/2814) issued by the Department of Water and Sanitation (DWS).**

SLR Consulting (Pty) Ltd has been appointed by United Manganese of Kalahari (Pty) Ltd to conduct an Environmental Authorisation Application for the proposed amendment of the Environmental Management Programme and related Environmental Authorisations at the UMK Mine, near Hotazel, Northern Cape Province.

A draft Scoping Report (DSR) 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 amendments include the extension of the EME workshop, development of hard park areas, expansion of the road truck staging area, development of Barlows Store, pit expansion and the establishment of four Waste Rock Dumps.

The DSR notes heritage desktop reports are being conducted (see page 9-4 of the DSR) and will be submitted during the EIA phase of the application.

In an Interim Comment issued on the 18/09/2020, SAHRA noted the pending heritage reports. Since the issuing of the comment, the draft EIA, HIA and PIA have been submitted to SAHRA for review (25/03/2022).

*Bamford, M. 2022. Palaeontological Impact Assessment for the proposed Surface Infrastructure changes at the UMK Mine on Farm Botha 313, the Remaining Extent (Re) of the Farm Smartt 314, and Portion 1 and*



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*Remaining Extent (RE) of the Farm Rissik 330, Northern Cape Province.*

The proposed development area is underlain by banded iron formations that do not contain fossils with overlying aeolian Kalahari Group sands that do not preserve fossils very well. The area has been disturbed by previous mining operations. A Fossil Chance Finds Procedure is recommended to be followed and is provided in the report.

*Van der Walt, 2022. Heritage Impact Assessment for new surface infrastructure at United Manganese Kalahari, Hotazel, Northern Cape Province.*

Three isolated, out-of-context surface scatters of Stone Age lithics of low heritage significance were identified within calcrete patches in the proposed development area.

Recommendations provided in the report include the following:

- Implementation of a chance find procedure for both the archaeological and paleontological components;
- Excavations through aeolian sands to the calcrete layer especially in the pit should be monitored by an archaeologist or by an EO trained by an archaeologist.

## **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 EMPr:

- 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. Further additional specific conditions are provided for the development as follows:
  - Monitoring reports of the excavations of the aeolian sands that contain calcrete layers must be submitted to SAHRA upon completion of 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

# Amendment of The Environmental Management Programme and Related Environmental Authorisation for UMK Mine

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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/ 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 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

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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

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## ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/538892>

## 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.