



an agency of the  
Department of Arts and Culture

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CaseID: 20298

Date: Wednesday March 01, 2023

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## Final Comment

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

Attention: De Beers Consolidated Mines - Venetia Mine

**The De Beers Group appointed Digby Wells Environmental to complete an Integrated Regulatory Process (IRP) to obtain the necessary Environmental Authorisation (EA) for additional infrastructure required for the proposed conversion from an open pit to underground mining operation. De Beers received the EA for the proposed conversion prior to this application. As part of the IRP, Digby Wells compiled a consolidated Heritage Impact Assessment (HIA) based on the results of previous heritage assessments within the Venetia Mining Right (MR) and assessed impacts that may present risk of impact to identified heritage resources posed by the additional infrastructure only.**

It is noted that proposed amendments under application include a decline shaft as one of two shafts approved in the initial underground mining application; expansion of the waste rock dump and tailings area; pipelines to transport dangerous goods; small underground dams and a clean water attenuation pond; and amendment of the EMP boundary to align with mining operations area and exclude Diamcor Mining Right area.

The Venetia Mine is located on various portions of the farm Venetia 103 MS, Krone 104 MS, Rugen 105 MS, Drumsheugh 99 MS, Schroda 46 MS and a portion of Greefswald 37 MS, in the Musina Local Municipality of Limpopo Province.

A Heritage Impact Assessment (HIA) by Digby Wells inhouse heritage consultants was submitted to the South African Heritage Resources Agency (SAHRA) for commenting in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Hardwick, S. and Nel, J. October 2022. Integrated Regulatory Process for the De Beers Group Venetia Mine near Alldays, Limpopo Province: Consolidated Heritage Impact Assessment.*

The study area has been subject to various heritage assessments since the mines establishment and this current HIA report is a review of the available assessments without conducting site verification. The mine right area is known to have several heritage sites, 7 are known heritage sites of which 5 (remains of Iron Age village) have been mitigated and one graveyard is conserved *in situ*. All proposed construction activities will be located within already disturbed areas. There is an overall low potential impact to sites in the study area and



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slightly low to medium chance of impact to previously unknown sites that may be uncovered during construction.

The author recommends the following:

Previous recommendations still stand and must be carried forth into the amended EMPr.

Undisturbed areas must be monitored during ground clearance and construction activities.

The heritage management plan must be amended to be relevant to the additional changes.

The chance finds procedures to be included in the amended EMPr.

It is noted that the HIA report (pg 32) mentions the fossil chance finds procedures developed by Rubidge (2021) will also be included in the amended EMPr.

## Final Comment

The SAHRA Development Applications Unit notes and accepts the submission of the draft BAR and HIA report. SAHRA has no objections to the proposed development on the following conditions:

38(4)a – The SAHRA Development Applications Unit (DAU) and the Burial Grounds and Graves (BGG) Unit has no objections to the proposed development;

38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. No other additional specific conditions are provided for the development,

There must be a buffer zone of a 100m maintained around identified burial site(s) and a 30m buffer for all other sites during construction activities;

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 DAU (Nokukhanya Khumalo/Natasha Higgitt 021 202 8660) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offence 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/Ngqalabutho 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 offence 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

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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 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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Nokukhanya Khumalo  
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: <https://sahrissahra.org.za/node/610275>  
(DMR, Ref: )

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.