

Letter

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

Attention: Mr Mzamani Mdaka
Wide Investments 100 (Pty) Ltd
Edit view PO Box 2449
HOUGHTON
2041

Consultation in terms of Section 40 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) in respect of mine establishment/Mining Right Application on the remaining extent of the farm Mashwening 557, situated in the Magisterial District of Kuruman, Northern Cape Province.

Thank you for your informing SAHRA of the proposed establishment of the Mashwening Iron Ore Mine. According to the submitted documentation, it is the intention of the applicants for the DMR application in terms of the MPRDA to run in conjunction with the EIA process in terms of NEMA.

In terms of Section 38(8) of the NHRA, any application process being followed in terms of either NEMA or the MPRDA must allow for SAHRA to determine whether or not the evaluation done in terms of impacts to heritage resources fills SAHRA's requirements. Any comments and recommendations of the heritage authority must be taken into consideration by the permitting authority before permission is granted. As such, only one process need be followed for this proposed development of the Mashwening Mine in terms of impact to heritage resources.

The proposed mine development requires approximately 320ha for open-cast mining and an additional 53ha for infrastructure including drip irrigation infrastructure, haul roads, a tailings facility, a power supply substation, water supply, an office, processing facilities and workshops. The project area has previously been prospected for manganese and as such, a number of historical sampling pits are located within the project area.

According to the submitted Scoping Report, a Heritage Impact Assessment was completed for the prospecting phase of this application. No details of the author, name or date of this report have yet been provided to SAHRA. According to this report, the area surrounding the farm has been disturbed by mining activities and industrial development. The heritage report indicated that Middle Stone Age scatters and structures older than 60 years are present on the property. These heritage resources are likely to be impacted by the proposed development.

As such, SAHRA requires that a new Heritage Impact Assessment be conducted that assesses the impact of the proposed development of the Mashwening Iron Ore Mine on all heritage resources. These resources must be mapped overlaid with the proposed mine layout plan so that direct and indirect impacts can be identified.

The submitted heritage impact assessment must satisfy SAHRA's minimum standards as well as Section 38(3) of the NHRA and must assess impacts to all heritage resources. Please also note that that clearing of vegetation and building for access roads may also destroy or damage archaeological and/or palaeontological

Proposed Mashwening Iron Ore Mine

Our Ref: 9/2/055/0002

Enquiries: Jenna Lavin
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CaseID: 3955

Date: Tuesday November 05, 2013

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sites. SAHRA therefore requests that a full Heritage Impact Assessment is conducted prior to any mining related activities occurring on site.

The requested HIA must include an assessment of impacts to archaeological resources. The quickest process to follow for the archaeological component would be to contract a specialist (see www.asapa.org.za) to provide a Phase 1 Archaeological Impact Assessment Report. This must be done before any prospecting drilling, trenching or mining takes place. The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38 of the NHRA) about the process to be followed. For example, there may need to be a mitigation phase (Phase 2) where the specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of the sites.

A Palaeontological study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter from a Palaeontologist motivating for an exemption is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary (see www.palaeontologicalsociety.co.za).

Any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

SAHRA looks forward to receiving this additional information before commenting further.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Jenna Lavin
Heritage Officer
South African Heritage Resources Agency



The South African Heritage Resources Agency

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Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/137408>

Edit view (DMR - NC, Ref: NC 30//5/1/2/2/10037 MR) (DENC, Ref: NC/EIA/12/JTG/GAE/KAT2/2013)



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