



Final Comment

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

Attention: Mr Ralton Maree
De Beers Consolidated Mines
P.O. Box 616
Kimberley
8300

Environmental Management Plan for prospecting right on Portions 1, 2, 3, 4, 5, and Remaining Extent of Venetia 103 MS, Musina District, Limpopo Province.

Gaigher, S. November 2009 (Amended). Heritage Impact Assessment for a prospecting application- Alldays, Limpopo Province.

De Beers Consolidated Mines Limited proposes the establishment of a prospecting programme for copper ore, cobalt, zinc ore, lead, nickel ore, sulphur, silver ore and gold ore on Portions 1, 2, 3, 4, 5, and remaining extent of the farm Venetia 103 MS, in the Musina District, Limpopo Province. The site is currently an established Diamond Mine. The Mapungubwe World and National Heritage Site is situated near the Venetia Diamond Mine and within the Buffer Zone of the World Heritage Site.

A previous heritage report was submitted to SAHRA APM Unit in 2010. SAHRA requested that the report be updated since it did not reflect the significance of the broader Mapungubwe Cultural Landscape. The exact nature of the prospecting plan was also not adequately summarized in the specialist report. SAHRA highlighted the following concerns regarding the specialist report:

- It does not cover all aspects of heritage;
- No Palaeontological Impact Assessment component has been included.
- There has not been any discussion concerning the potential current/long term and individual/cumulative impact of the proposed development activities on all aspects of heritage in and immediately around the project area;
- It does not provide clarity on how the expansion of mining activities in close proximity to the Mapungubwe World and National Heritage Site will impact on the integrity and authenticity of the site.

The report has since been updated and resubmitted to SAHRA. The updated report provides a brief analysis of the Mapungubwe Cultural Landscape and includes a monitoring plan. The report states that the project area is within 10km of the significant archaeological sites such as Mapungubwe Hill, K2, Schroda etc, although SAHRA believes this statement to be factually incorrect. This will need to be clarified. It is also of concern that the author did not update the date of the report, it still reads November 2009. This must also be corrected.





Although no heritage resources were identified during the field assessment, the increase of mining activities and related infrastructure development in the area and how this will affect the future status of Mapungubwe, is a major concern to SAHRA. The updated report does not properly address the concerns raised by SAHRA APM Review Comment dated May 2011.

SAHRA APM Unit is aware that the proposed prospecting activities will take place within the footprint of the existing Venetia Diamond Mine. According to the EMP submitted prospecting will include a total of 25 boreholes, 1600 meters of trenches and two pits. It is noted that further prospecting is dependent on the results of the initial geochemical sampling, mapping and geophysical surveying. If the proposed prospecting matures to drilling and trenching, work may take up to 18 months to complete and this may be spread over a five year period.

Decision:

- the report submitted is not a full Heritage Impact Assessment as it only relates to archaeology;
- the exact distance of the proposed project in relation to K2/Schroda must be provided to SAHRA and the archaeology report amended to reflect the true distance;
- the date of the archaeological report must be corrected to reflect the recent update since it was amended and resubmitted to SAHRA APM;
- since the development is at the initial phase of prospecting and it is not clear at this stage if the project will move beyond this phase, SAHRA APM Unit is of the opinion that the proposed prospecting may proceed. However, if the project moves forward to a mining right or mining permit phase, a detailed Heritage Impact Assessment will be required as outlined in the recommendation of the SAHRA Review Comment dated 24 May 2011;
- The monitoring plan submitted as part of the heritage report relates to a mining phase but the application received by SAHRA is only for prospecting. SAHRA requires clarification on this;
- the location of trenches and pits must be examined by an appropriately qualified archaeologist as it relates to the current prospecting application. The ECO must also be acquainted with the types of heritage resources likely to be encountered in the area. This should include palaeontological resources and in particular vertebrate fossils that are known to occur within the Clarens formation;
- If any archaeological or other heritage resources are found SAHRA APM Unit (Mr Phillip Hine/Mrs Colette Scheermeyer) must be notified immediately and an archaeologist may be required to undertake a phase 2 rescue excavation if the identified heritage resource is deemed to be significant. This will be done at the cost of the developer.





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

Yours faithfully

Phillip Hine
Heritage Officer

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:
(DMR, Ref: LP30/5/1/1/2/2394PR)

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.

