



**SOUTH AFRICAN HERITAGE  
RESOURCES AGENCY**

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DATE: 23 June 2010  
ENQUIRIES: Ms Mariagrazia Galimberti  
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DME REF: NC 30/5/1/3/3/2/1/1826 EM  
OUR REF: 9/2/008/0001

Mr John Edward Mann  
PO Box 29039  
Danhof  
9310

Dear Mr Mann,

**REQUEST FOR A HERITAGE IMPACT ASSESSMENT: CONSULTATION IN TERMS OF SECTION 40 OF THE MINERALS AND PETROLEUM RESOURCES ACT 2002 (ACT 28 OF 2002), FOR THE APPROVAL OF AN ENVIRONMENTAL MANAGEMENT PLAN FOR MINING PERMIT ON THE FARM BARKLY WEST COMMONAGE SITUATED IN THE MAGISTERIAL DISTRICT OF BARKLY WEST, NORTHERN CAPE REGION.**

We have received notification of your application for an environmental management plan in respect of mining permit for diamond (general).

In terms of the National Heritage Resources Act (NHRA), no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that before such sites are disturbed by development it is incumbent on the developer (or mine) to ensure that a **Heritage Impact Assessment** is done. This must include the archaeological component (Phase 1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required.

Although it is stated in section C5 of the EMP form that no graveyards or sites of historical significance are located within a kilometer of the affected environment, no the indication of a professional assessment is given. Also, other categories of

possible heritage resources, such as archaeological and palaeontological sites need to be assessed by a specialist. Please also note that clearing of vegetation and building for access roads may also destroy or damage archaeological and/or palaeontological sites. Consequently, we are looking forward to receiving the Heritage Impact Assessment as specified in section C5.1 **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.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top 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 attached list of accredited Palaeontologists).

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.

Attached please find a list of accredited palaeontological specialists who may be contacted to undertake the necessary palaeontological impact assessments. For a list of CRM archaeologists who may be contacted to undertake the necessary archaeological impact assessments please visit [www.asapa.org.za](http://www.asapa.org.za).

Yours sincerely



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SAHRA: Archaeology, Palaeontology and Meteorite Unit  
For: CHIEF EXECUTIVE OFFICER

Copies: SAHRA Northern Cape  
PHRA Northern Cape  
Mrs Sekepane (DME)

Appendices: SAHRA's Mining Pamphlet  
List of accredited palaeontologists