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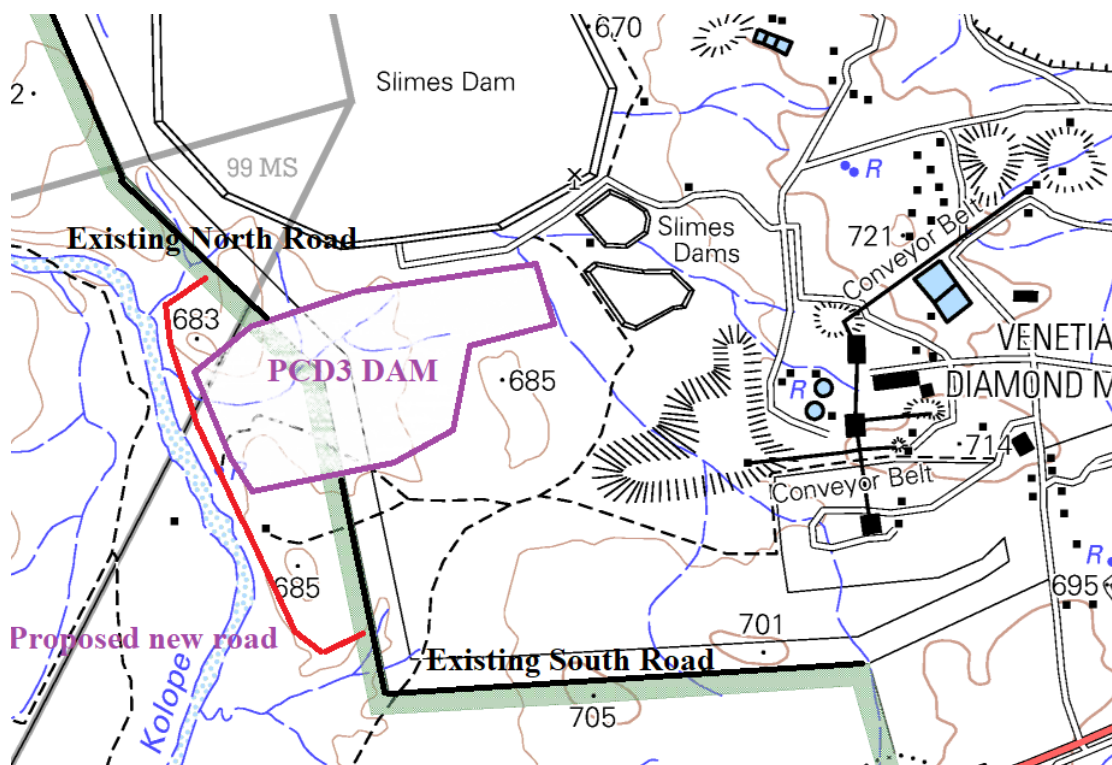
**2<sup>nd</sup> Addendum to the**

**1<sup>st</sup> phase H.I.A. of a proposed upgrading and extension of the proposed storm-water management project at Venetia Mine, Limpopo Province, South Africa**

**For De Beers Consolidated Mines (Pty) Ltd.**

**Project number DEB-VEN-21-02-03**

**(Amendment 2 on new request from Venetia for new bypass road for PCD3.**



Report prepared by: -

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**SIDNEY MILLER.**

*B.Sc (Engineering) Civil, M. (Architecture) Conservation. Asapa member no 087.*

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**1. Executive summary.**

**1.1.** Owing to the necessity to add a proposed new road for the De Beers Consolidated Mines (Pty) Ltd. Project number DEB-VEN-21-02-03, this Addendum to the original report of May 2021 and its first Addendum of September 2021 is prepared.

**1.2.** Shangoni remains the mandated environmental company to procure the necessary HIA.

**1.3.** It is the intent of Venetia Diamond mine to add a proposed new road to the previously sanctioned project number DEB-VEN-21-02-03 along the proposed western border of the mine.

**1.4.** The HIA assessment was undertaken on the 5<sup>th</sup> November 2021.

**1.5.** The only possible Later Iron Age site that was identified is an “unnatural” cluster of *Euphorbia ingens* as reported below. It is of no significance.

**1.6.** There is no encumbrance to mitigate any heritage resources relating to Act 25 of 1999. .



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## 2. Past occupation of the Landscape.

It is well known, as discussed in the 1<sup>st</sup> phase assessment, that owing to the geology, yearly precipitation and vegetative matters men and women have for a very long time settled permanently in this region along the river complexes and in the fertile valleys. The landscape abounded with all types of game, birds, reptiles and insects as well with a bounty of a variety of edible fruits, berries and plants, as well as for medicinal use. With the arrival of the Agro Pastoralists, the soils also proved to be productive and during the first 1500 years AD the yearly precipitation allowed sufficient crop yields. In due course, with the continuous climate change, the yearly precipitation fell to the region of 250 mm per year that is insufficient for dry-land agriculture.

This existence of this extensive population is also underscored by the myriads of rock shelters in the sandstone hillsides that was intensely utilised by Stone Age peoples. The heritage estate of South Africa also have here one of the most concentrated rock-art ensembles in Southern Africa, often including engravings and paintings in the same shelters. (One of the very special features in this region is the use of green as a colour in some of the images that is apparently due to the occurrence of copper at Musina.) This occurrence of rock-art in the region is extensively discussed by the likes of Schoonraad, Pager, Eastwood, Cnoops, Blundell,

Regarding the Iron Age period one may assume that from as early as the fourth century they also appear in this landscape, as proven by the Klein Africa site only some 80 kilometres to the south of Venetia, excavated by H.P. Prinsloo in the 1970's. Then for 10 more centuries the Iron Age population waxed and waned around the highpoint of the Mapungubwe culture.

## 3. Geology and vegetation.

But, as all over the world, societies depended on grains as a central food source needs soils to cultivate these grains in. Soils on their turn is either a direct derivative from the geological substructure of the region, or is/was deposited by either ice, water or wind born sources. This was then the basis for the thriving Iron Age occupation of the Vhembe district.

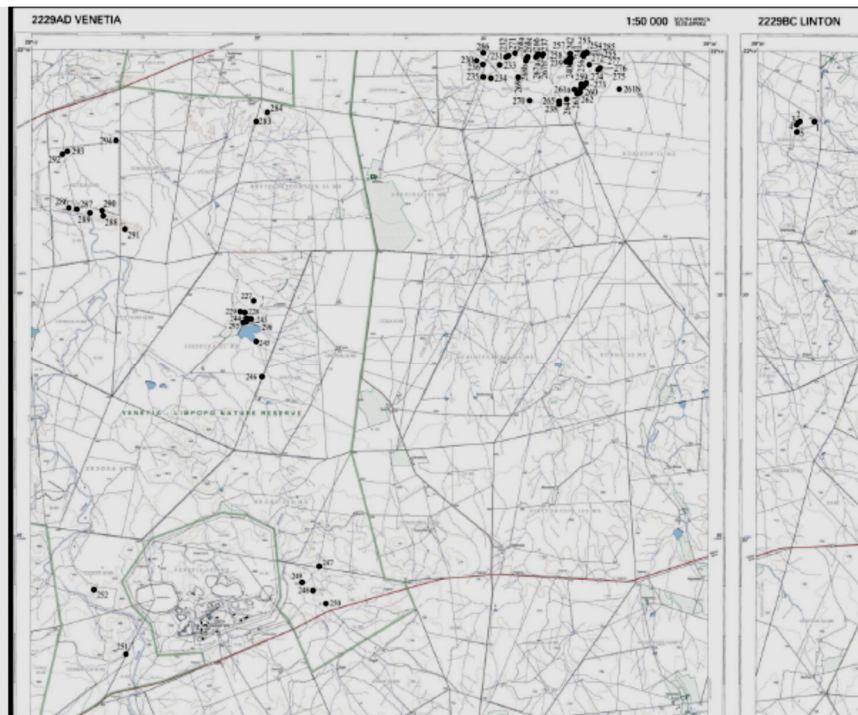


BUT.....The formation of the multifaceted kimberlite core of the Venetia mine also transformed the geology around its epicentre leaving behind a very hard calcite geological sub stratum for the formation of soils, which did not really occur. This resulted in the very stunted mopani-veld surrounding the mine, as well as nearly no soils suitable for cultivation. This very basic tool of archaeological investigation then leads the investigator to the hypothesis that the probability of finding any significant archaeological remains are very low and then also low risk in missing any sites that might be detected.

**Fig. 01.** The landscape in the areas of investigation consists of a calcite substructure inhibiting growth in vegetation, both trees and grass species. This substructure supports mainly two indigenous tree species of, namely *Colophospermum mopane* (Mopani tree) in the dry veld and *Lonchocarpus capassa* (Apple leaf tree) along drainage lines. On most portions of the site under investigation it is possible to do an on-foot survey owing to the scarcity of vegetation. This is then also a clear indication of the soils not being capable to support grain based societies. (Photo S.M. Miller 2021.)



**Fig. 02.** Drainage lines such as the **Kolope** in this image here on the western side and the on the **Matotwane** on the eastern side of the mine may have had some suitable soils for limited cultivation. That is why the **Kolope** area was investigated by on-foot survey where other limitation factors dictated otherwise. Note the stunted *Colophospermum mopane* (Mopani trees) growing right up to the drainage line, with the *Lonchocarpus capassa* (Apple leaf trees) surviving in the little soil available along its banks. . (Photo S.M. Miller 2021.)



**Fig. 03.** The hypothesis of settlement distribution in relation to geology and vegetation is then also underlined by this map kindly supplied by Tom Huffman which is the result of years of research in the Vhembe district by the Wits Department of Archaeology (Map Tom Huffman.<sup>1</sup>)

<sup>1</sup> This is the intellectual property of the University of the Witwatersrand and its researchers and may not be used in publications without their consent

#### **4. Previous Archaeological Impact Assessments.**

##### **4.1. The 2000 Hanish Report.**

The whole site within the security fences of the Venetia mine has been assessed and mitigated by H.O.M. Hanish between 1989 and 2000. This is described in the *Environmental Management Report for Venetia Mine* of July 2000, Appendix 3.

##### **4.2. The 2012 Pistorius Report.**

In an extensive report covering 58 pages Pistorius verbally describes the finding of six Iron Age sites, a graveyard and a MSA in one page. The information regarding these sites are only descriptive, with only two photographs of the grave site and what appears to be some bulldozed rocks.

1. There is no track record of how these sites were identified, and no GPS reading to locate or re-locate them are available.
2. The one Iron Age site on the west of the mine at the foot of the dump and the MSA site ought to have been immediately mitigated in 2012 according to the mine's Heritage Management Plan and SAHRA directives.
3. The wall in the photograph has no characteristics of a Khami Period wall and Pistorius describes the ceramics as "un-diagnostic". So it is difficult to understand the site being described a "Khami-Period site?"
4. The MSA site Pistorius described as a small ensemble of stone artefacts. If they were left in place there is no chance that they would have survived 9 years of mine traffic over PCD1. <sup>2</sup>
5. It is also noted that in August 2015 excavation permits were issued to Dr Shadreck Chirikuri by SAHRA for possibly the mitigation of the 7 sites mentioned in the 2011 report. As there is no record of these permits being utilised, it must be assumed that the sites were not mitigated, or could not be found?
6. As these sites fall outside the designated areas for the present H.I.A. no further attention were allocated to them. If SAHRA is in a quandary regarding the sites, maybe Chirikuri is the responsible person to communicate with.

As one site of Pistorius's report (depicted as JP1 with a green icon on the Google Earth Images) falls within range of the present investigation its uncertain position was investigated.

#### **5. Mine and Game Farm Security.**

The final and one of the most inhibiting factors to consider doing HIA work on mining property is rules, regulations and restriction to certain areas on site.

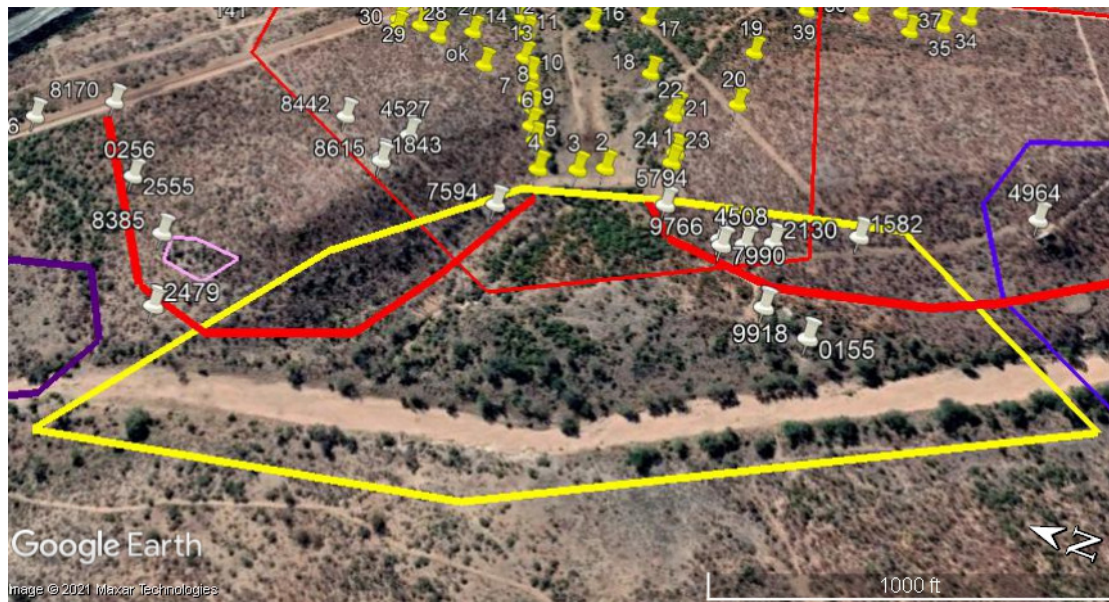
In the case of the present investigation the "site" is located outside of the "Mine" and inside the massive Venetia Game Reserve that hosts a large number of game that inhibits the free movement of personnel on the ground outside of vehicles. Therefore all reconnaissance have to be conducted under armed guidance of local rangers.

Then there are also restrictions to access of areas where special conditions exist regarding animals such as leopard females with cubs. This condition was then in play with a certain area shown in *Fig. 04* below.

All of the above then does impact on how this present assessment was conducted at Venetia Mine.

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<sup>2</sup> *The present author did visit the proximity of the site (as indicated on Pistorius's 2012 map,) but without a GPS reading there was no chance of finding it.*



**Fig. 04.** The yellow line demarcates an “area of respect” owing to the presence of a leopard with young cubs. This was then confirmed by the fresh tracks of adult and sub-adult leopards identified by Ibart Jansen Van Rensburg (the armed security person that escorted the author) on the South Road at the southern entrance to the study area. (*Google Earth 2021*)

## 6. Methodology.

With all the above in mind, and to address the concerns of SAHRA, the present investigator acquired a system of GPS track logging that also allows the user to take digital photographs that are four dimensionally recorded and labelled. With this system the area of interest was documented as can be seen in **Fig. 06** below (white icons) and recorded in the track log record table **Fig.05**.

During two visits to the Venetia Mine in September and November 2021 some limitations to the present system was identified: -

- a. Owing to the topography and the large dumping mounds there are sometimes loss of contact with roving satellites that provide accurate GPS coordinates.
- b. With temperatures, such as experienced during this investigation, of over 40 degrees Celsius, electronic equipment tend to overheat. This implies special care of the equipment utilised for global positioning.

The present author then visited the site on the 5<sup>th</sup> of November 2021 with Mr Cecil Cloete from the Environmental Office as main host. He is well conversant with the site and the challenges surrounding access and recording on site but was not qualified to escort the present author on foot outside of a vehicle. As the person normally escorting the author on foot inside the game farm, Trevor Tshivanandalani was not available, Mr Ibart Jansen Van Rensburg of the Environmental Office took over that role.

A total of 35 points were logged and photographed, covering as much as humanely possible of the proposed new road area.

The photographs are not included in this document but is presented in a separate file for the perusal of interested parties.

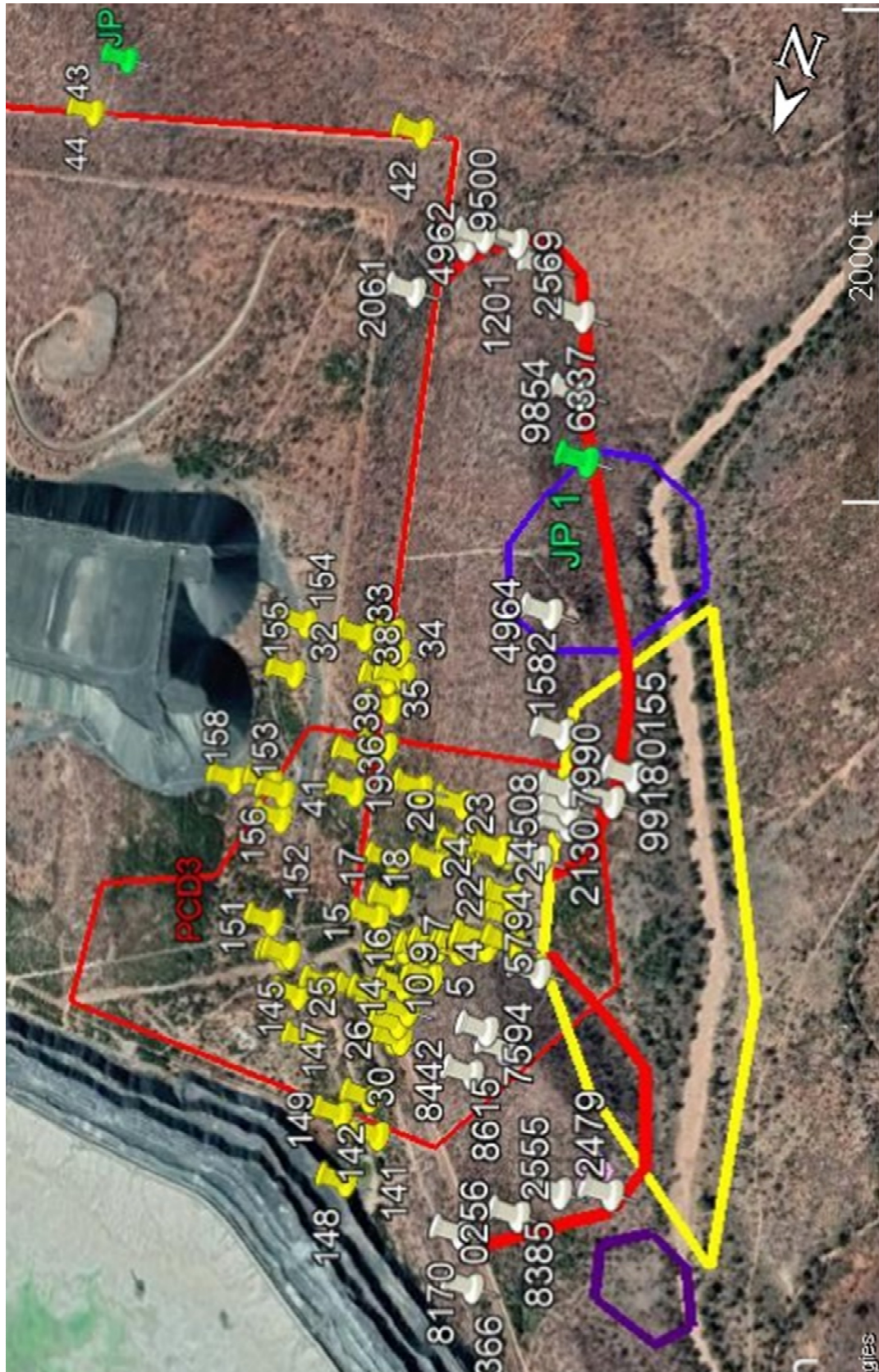
7. Track Log. (See google earth image on page 10.)

No	Latitude	Longitude	Day	Time	Photo ID	Comment
The digital photos have a typical 13 digit identification number. For the purpose of avoiding confusion only the last four digits were used for ID in this track log.						
<b>PCD3 Outside mine</b>						
1	23°27'36.28"S	29°20'40.28"E	11/05	08:15	3367	On the road testing unreliable reading
2	22°50'32.80"S	29°12'25.95"E	11/05	09:15	7261	On the road testing
3	22°49'2.38"S	29°12'42.53"E	11/05	09:17	1037	On the road testing
4	22°48'9.93"S	29°12'32.36"E	11/05	09:18	1855	On the road testing
5	22°35'45.08"S	29°9'19.22"E	11/05	09:42	5616	On the road testing
6	22°29'56.60"S	29°12'31.29"E	11/05	09:50	6108	On the road testing
7	22°27'0.64"S	29°17'26.97"E	11/05	10:55	0155	Kolope drainage line. Apple leaf trees
8	22°26'59.25"S	29°17'27.86"E	11/05	10:56	9918	Kolope drainage line
9	22°26'58.76"S	29°17'29.10"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°26'58.19"S	29°17'29.59"E	11/05	10:58	4508	Facing east, disturbance, geology, vegetation.
10	22°26'58.86"S	29°17'29.10"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°26'58.97"S	29°17'29.95"E	11/05	10:59	2130	Facing south-southeast, old disused road up to exploration dwelling
11	22°26'57.47"S	29°17'29.50"E	11/05	11:01	9766	Old pump and DB Boxes for exploration dwelling
12	22°26'57.56"S	29°17'29.30"E	11/05	11:01	7990	Facing west on proposed new road.
13	22°26'55.58"S	29°17'30.17"E	11/05	11:02	5794	Facing northeast. Existing Dam
14	22°26'46.83"S	29°17'28.58"E	11/05	11:09	8615	Facing southwest over landscape disturbance and area of leopard with cubs.
15	22°26'46.81"S	29°17'28.64"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°26'47.21"S	29°17'29.91"E	11/05	11:10	4527	Facing south, viable road to Kolope area of leopard with cubs.
16	22°26'46.78"S	29°17'28.71"E	11/05	11:11	1843	Old fencing and new survey beacons.
17	22°26'45.99"S	29°17'29.40"E	11/05	11:14	8442	Facing north from viable road to Kolope area of leopard with cubs.
18	22°26'35.70"S	29°17'26.15"E	11/05	11:16	2366	Survey beacon in stunted <i>Mopane</i> veld
19	22°27'6.16"S	29°17'33.81"E	11/05	11:24	4964	Facing southwest over mining disturbance from exploration dwelling
20	22°27'18.48"S	29°17'47.06"E	11/05	12:55	2061	Facing southwest
21	22°27'20.94"S	29°17'44.80"E	11/05	12:59	9500	Facing north vegetation/geology
22	22°27'21.50"S	29°17'43.95"E	11/05	13:00	4962	Facing north vegetation

23	22°27'18.81"S	29°17'45.22"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°27'21.52"S	29°17'41.99"E	11/05	13:04	1201	Vegetation/ Security with rifle
24	22°27'18.70"S	29°17'42.88"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°27'20.76"S	29°17'39.78"E	11/05	13:07	2569	Facing north, Geology vegetation
25	22°27'18.25"S	29°17'42.85"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°27'18.99"S	29°17'37.18"E	11/05	13:07	6337	Facing north, Geology vegetation
26	22°27'15.73"S	29°17'35.98"E	11/05	13:09	9854	Facing north, Exploration house and mining disturbance
27	22°27'17.51"S	29°17'40.78"E	11/05	13:13	0080	unreliable reading
28	22°27'15.92"S	29°17'36.42"E	11/05	13:13	0395	unreliable reading
29	22°26'37.74"S	29°17'27.66"E	11/05	13:31	8170	Geology
30	22°26'39.97"S	29°17'25.11"E	11/05	13:35	0256	Facing southwest, vegetation/geology
31	22°26'39.97"S	29°17'25.11"E	11/05	13:36	2555	Facing southwest, vegetation/geology
32	22°26'40.81"S	29°17'24.25"E	11/05	13:39	8385	Facing southwest, vegetation/geology. <i>Euphorbia ingens</i>
33	22°26'41.66"S	29°17'23.45"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°26'43.07"S	29°17'21.07"E	11/05	13:39	2479	Facing west. Stunted <i>Mopane</i>
34	22°26'55.61"S	29°17'30.19"E	<b>Incorrect GPS reading owing to loss of satellite signals. Estimated position below</b>			
	22°26'50.79"S	29°17'28.26"E	11/05	13:52	7594	Facing west. Stunted <i>Mopane</i>
35	22°26'57.36"S	29°17'29.58"E	11/05	13:55	1582	Infrastructure, disturbed areas

**Fig. 05.** All the points with GPS information (white icons) in **Fig. 06** below, visited during the investigation recorded by four dimensionally verified photographs. (Google Earth 2021.)

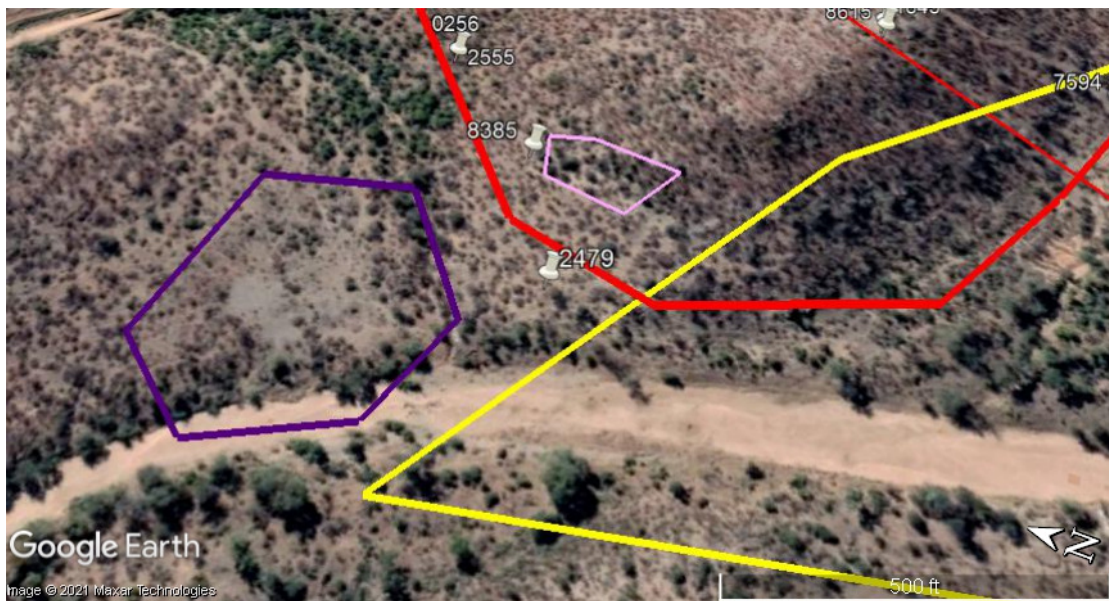




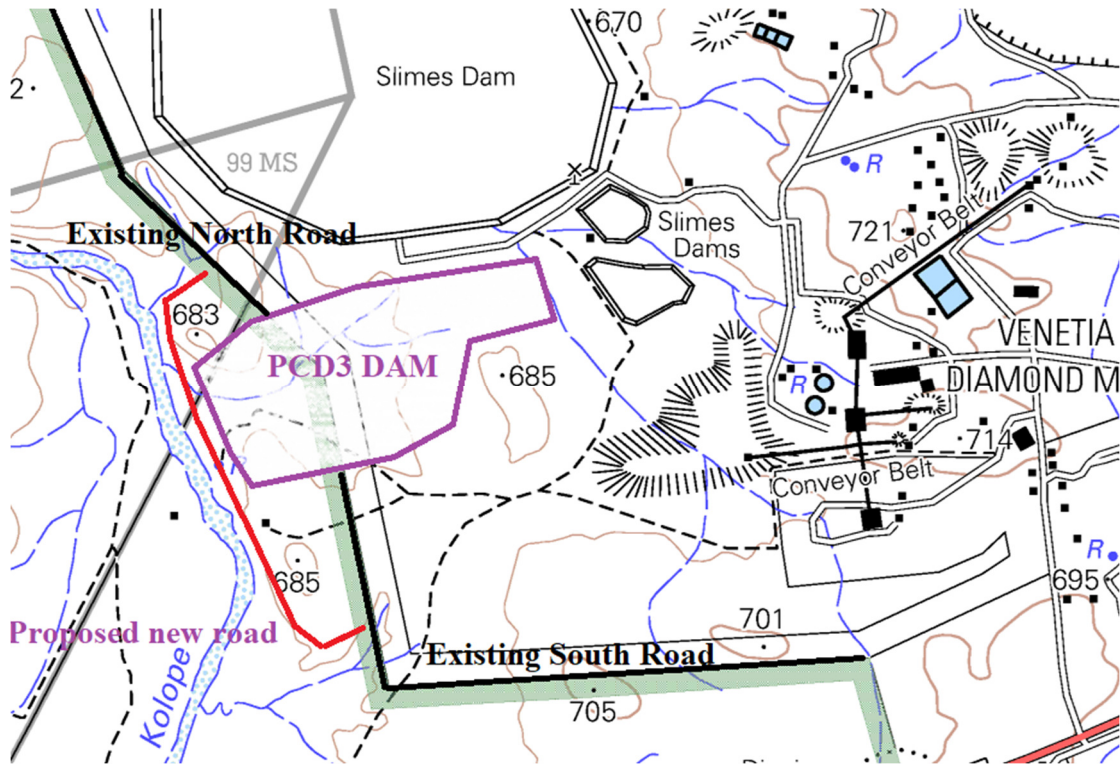
**Fig. 06.** All the points (white Icons) visited during the investigation. The dark red line is the route of the proposed new road. The light red line is PCD3 covered in the main report (May 2021) and the September (2021) track logging Addendum. . (Google Earth 2021.)



**Fig. 07.** In the southern areas of the investigation area the purple line demarcates areas of mining exploration impact surrounding the exploration dwelling (marker 4964). (Google Earth 2021.)



**Fig. 08.** In the northern areas of the investigation area the purple line demarcates areas of mining exploration impact. The pink line indicates a cluster of *Euphorbia ingens* (marker 8385) that may represent Late Iron Age occupation. (Google Earth 2021.)



**Fig. 09.** 1 : 50 000 map showing route of proposed new road around PCD3 that has to form a new link between the South Road and the North Road after completion of PCD3. (2229AD VENITIA.)

## 8. Summary of findings.

8.1. The investigation was undertaken on the 5<sup>th</sup> November 2021. The environmental circumstances was challenging with temperature exceeding 40 degrees Celsius after mid-day.

8.2. Access to certain restricted areas could only be achieved by vehicle.

8.3. Where armed escort was available there was still a restriction on access to certain areas (See Fig 04.)

8.4. In the southern area that was inspected on foot no heritage remains occur. Here there can also be seen in Fig 07 previous mining exploration to the west and south of the exploration dwelling situated at icon 4964.

8.5. The green icon JP1 is an approximation of the so-called Pistorius “Khami-type site” in his 2012 report. The area was visited on foot but no evidence of a heritage site could be identified.

8.6. The areas to the north of the mining exploration designation below the exploration dwelling was visited by vehicle. There exist a number of disturbances relating to road, water and electricity services to the exploration dwelling. The environmental realities of geology and vegetation and flood-plain related effects also places the site in a rating of low probability for heritage remains.

8.7. In the northern area places surveyed by vehicle revealed no heritage remains that could be identified.

8.8. The area to the south of the hill was not investigated owing to restriction related to female leopard and cubs. Taking into account this is mainly a floodplain area of the Kolope, places it in a rating of low probability for heritage remains.

8.9. The only area of interest that was revealed during the on-foot survey is outlined by a pink line near the white icon numbers 8385 and 2479 in Fig. 08. In this area an “unnatural grouping” of *Euphorbia ingens* occur that are often an indication of “Later Iron Age” occupation in the region. A walk-through revealed no walling or sherds or building remains or midden material. It may imply a possible site of a few herders related to a “cattle outpost” that created the site owing to burning available firewood to the benefit of the *Euphorbia ingens*. However it is out of the range of the proposed new road.



Fig. 10. Collection of *Euphorbia ingens*. No evidence of occupation. Possibly habitation of herders for a “cattle outpost” (Photo S.M. Miller 2021.)

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## **Appendix 1: Declaration of Independence.**

**I, Sidney Mears Miller (ID 5412135029082) declare that:**  
**I act as an independent environmental practitioner in this application;**  
**I will perform the work relating to the application in an objective manner, even if this result in views and findings that is not favourable to the applicant;**  
**I declare that there are no circumstances that may compromise my objectivity in performing such work;**  
**I have expertise in conducting environmental impact assessments, including knowledge of the National Heritage Resources Act (No 25 of 1999) and any guidelines that have relevance to the proposed activity;**  
**I will comply with the Act, regulations and all other applicable legislation;**  
**I will take into account, to the extent possible, the matters listed in regulation 8 of the regulations when preparing the application and any report relating to the application;**  
**I have no, and will not engage in, conflicting interests in the undertaking of the activity;**  
**I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing**  
**- any decision to be taken with respect to the application by the competent authority; and**  
**- the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;**  
**I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;**  
**I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;**  
**I will keep a register of all interested and affected parties that participated in a public participation process;**  
**I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not;**  
**all the particulars furnished by me in this form are true and correct;**  
**will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations;**  
**I realize that a false declaration is an offence in terms of regulation 71 and is punishable in terms of section 24F of the Act.**

### **Disclosure of Vested Interest**

**I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity AND OR proceeding other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations.**



**SIDNEY MEARS MILLER.**

**Appendix 2: Provisional indemnity.**

**Declaration by author.**

I Sidney Miller hereby declare that all reasonable steps were taken to identify the heritage resources on the property under investigation. For obvious reasons heritage remains that occurred underground cannot be vouched for. In the event of such remains being uncovered during the mining operations work should be stopped and a heritage practitioner or the heritage authorities must be informed. The cost of such new investigation will be for the account of the client.



**SIDNEY MEARS MILLER.**



**Appendix 3: Shangoni impact and mitigation monitoring analysis.**

No.	Aspect affected	Activity	Potential Impact	Phase	Mitigation type	Impact management actions / Mitigation measures	Impact management outcome	Standard to be Achieved	Time period for implementation
<b>Venetia proposed new road PCD3</b>	No aspects affected	Proposed new road	No Impact	As per engineering specifications	No Mitigation	No Impact Management actions or Mitigation measures	No Impact Management applicable	As per engineering specifications	As per engineering/contractor time line agreement specifications