



15 March 2019

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**To whom it may concern**

**LETTER FOR HIA EXEMPTION REQUEST: PROPOSED ASSSSMANG BLACK ROCK MINING OPERATIONS (BRMO) ALTERATIONS TO THEIR GLORIA MINE PROCESS WATER MANAGEMENT SYSTEM, NORTHERN CAPE PROVINCE**

The above-mentioned project refers. Assmang's Black Rock Mining Operations (BRMO) proposes to make alterations to their Gloria Mine process water management system, which will consist in the main of:

- Construction of a 2.5ML process water reservoir at their Gloria Mine facility located near Hotazel, in the Northern Cape.
- Installation of related piping and water reticulation equipment.

Assmang (Pty) Ltd mines manganese ore in the Black Rock area of the Kalahari, in the Northern Cape Province. The Black Rock Mine Operations (BRMO) are approximately 80 kilometres (km) north-west of the town of Kuruman, in close proximity to the town of Hotazel. The proposed site for the 2.5ML reservoir is within the Gloria mine boundary, located on Portion 1 of the farm Gloria No. 226 (Figure 1-2).

The Reservoir will be approximately 30m in diameter. It will be constructed of concrete and steel. Piping from existing plant and infrastructure will be joined to the reservoir. The entire development will occur within the existing disturbed footprint of the Gloria mine surface processing plant and stockpiling area.

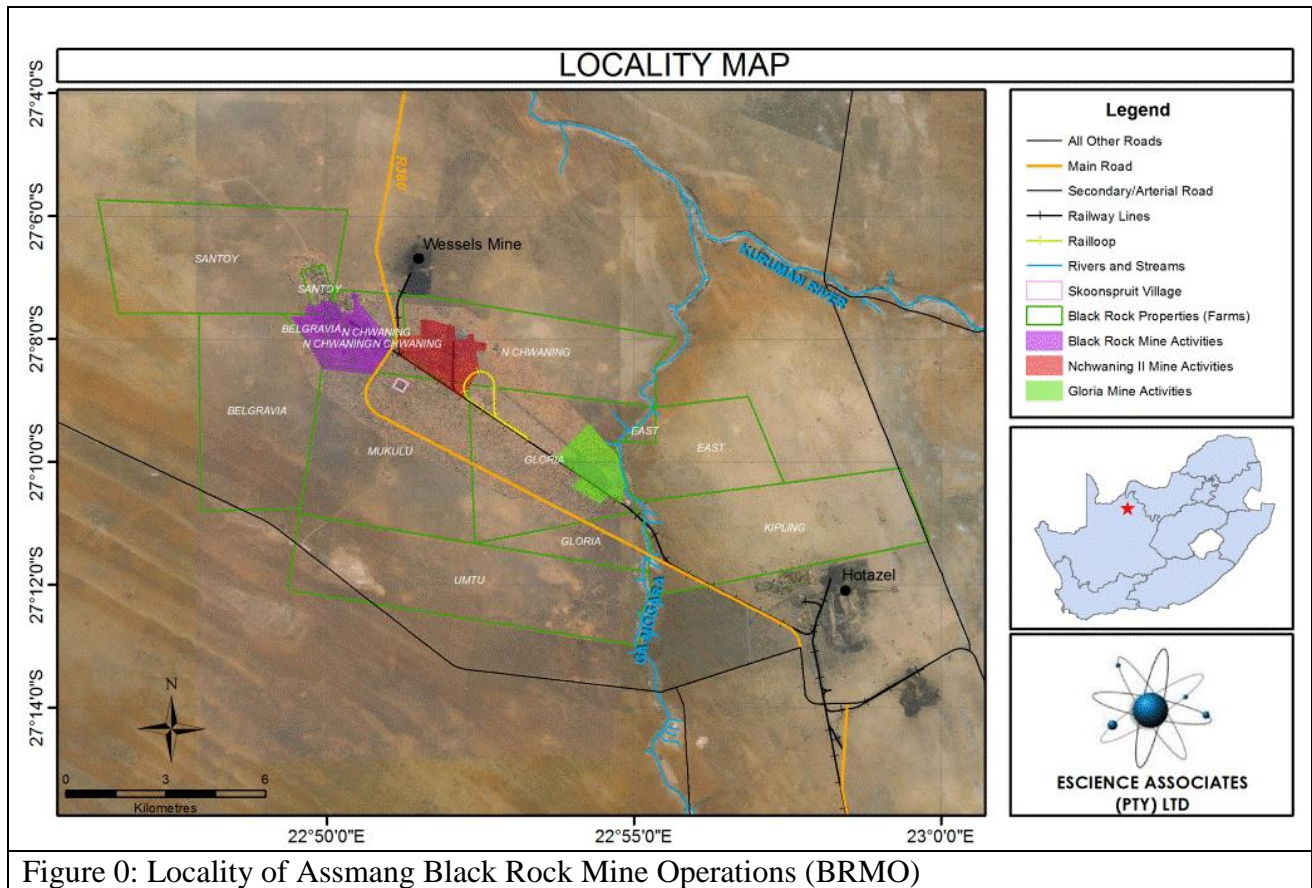


Figure 0: Locality of Assmang Black Rock Mine Operations (BRMO)

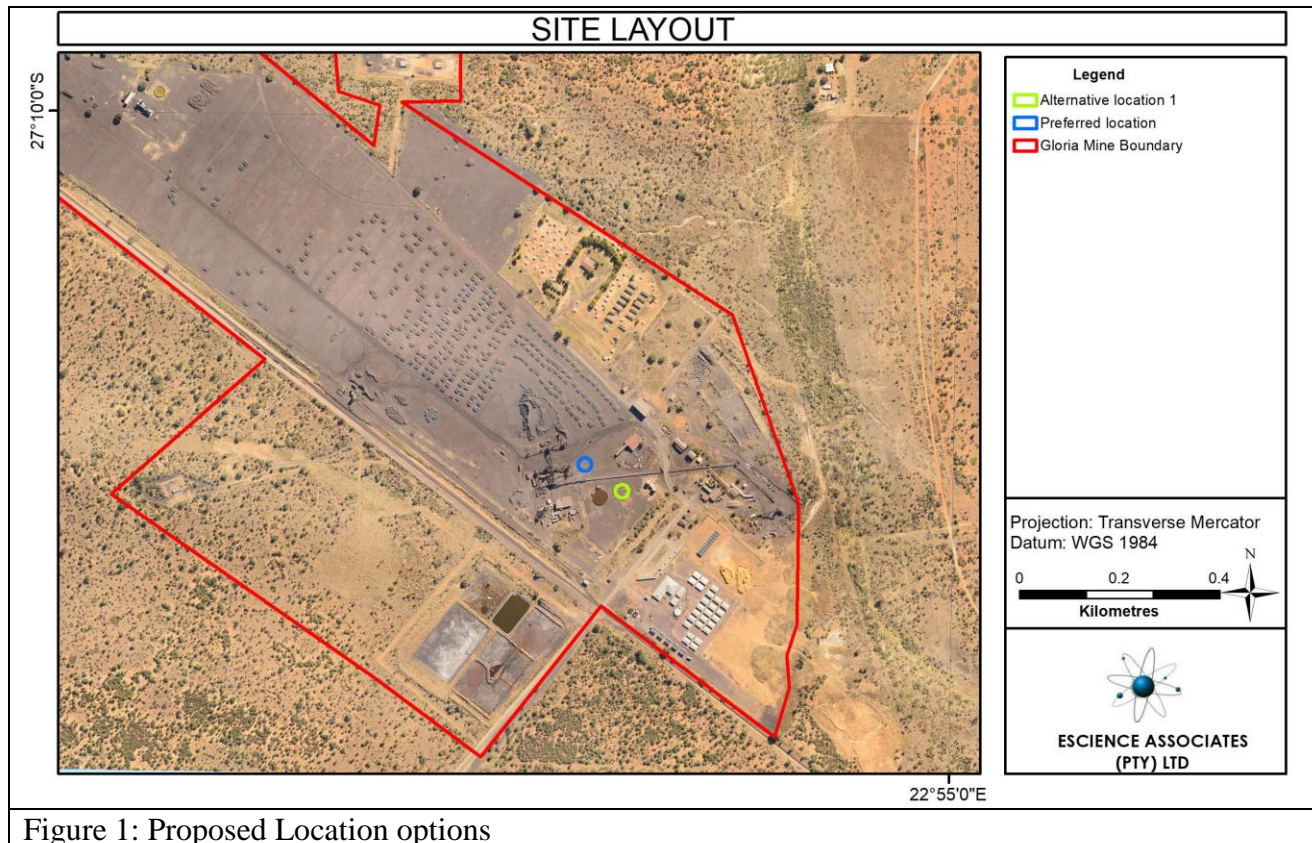


Figure 1: Proposed Location options

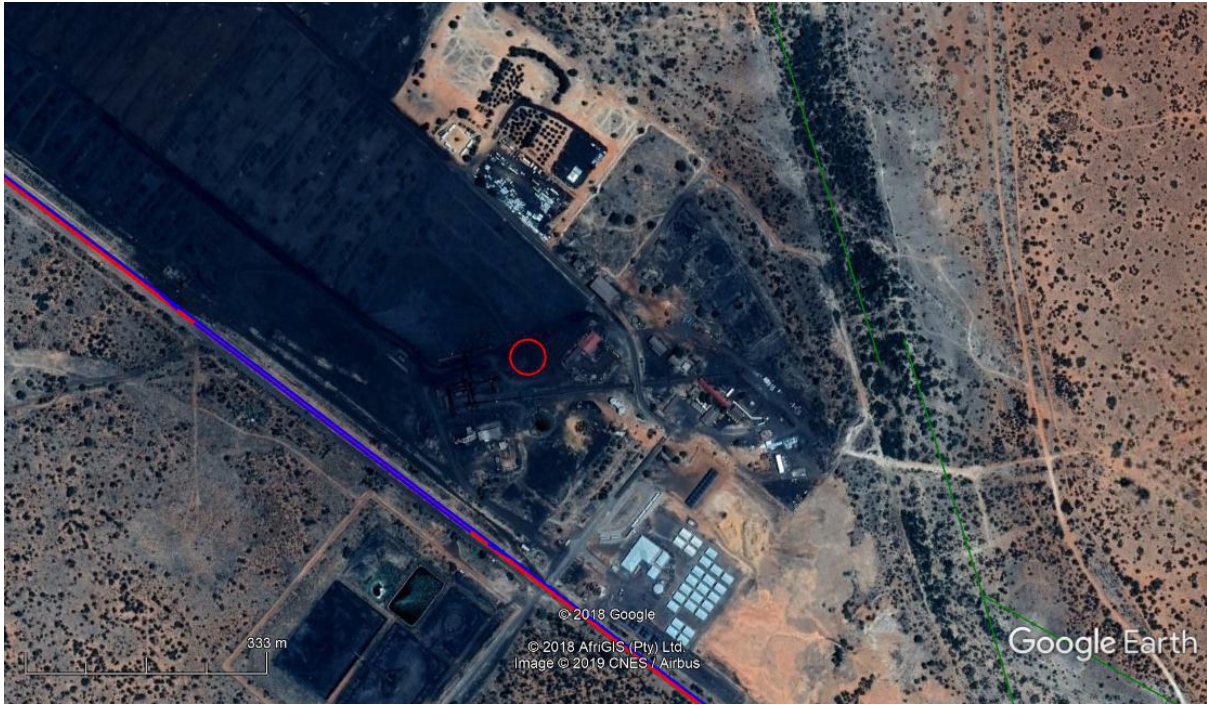
The site was visited on 11 March 2019 and the entire area was found to be disturbed (Figure 3-5). It also needs to be noted that an HIA had been done here in 2009 (Küsel<sup>1</sup>) as well as various reports by Van Vollenhoven between 2014 and 2016<sup>2</sup>. Although some Stone Age sites and two cemeteries were identified, these are outside of the perimeter of the proposed development.

It therefore is my opinion that the project may be exempted from doing a Heritage Impact Assessment (HIA). The following is applicable:

- The proposed development is within an area already entirely disturbed by mining activities.
- An HIA was conducted in 2009 as well as between 2014 and 2016 in the wider area and although sites were identified these are not to be impacted on.
- There are no natural vegetation on the site.

<sup>1</sup> Küsel, U.S. et.al. 2009. **Cultural Heritage Impact Assessment of Manganese Mining areas on the farms Belgravia, 264, Santoy 230, Gloria 226 and Nchwaning 267, at Black Rock, north of Kuruman, Kgalagadi District Municipality, Northern Cape Province.** (Unpublished report, African Heritage Consultants, Magalieskruin).

<sup>2</sup> See Archaetnos database.



**Figure 3: Google Earth view of the site indicating the disturbance.**



**Figure 4: General view of the impacted area.**



**Figure 5: View indicating the disturbance.**

Due to the mentioned factors, the chances therefore of finding any heritage related features are indeed extremely slim. It is therefore believed that an additional Heritage Impact Assessment (HIA) is not needed for this project and any of the alternatives can be used. This letter serves as an exemption request to the relevant heritage authority.

The developer should however note that due to the nature of archaeological material, such sites, objects or features, as well as graves and burials may be uncovered during construction activities on site. In such a case work should cease immediately and an archaeologist should be contacted as a matter of urgency to assess such occurrences.

**Recommendation:**

**That the development be exempted from doing an HIA.**

I trust that you will find this in order.

Yours faithfully

Prof AC van Vollenhoven: Director