



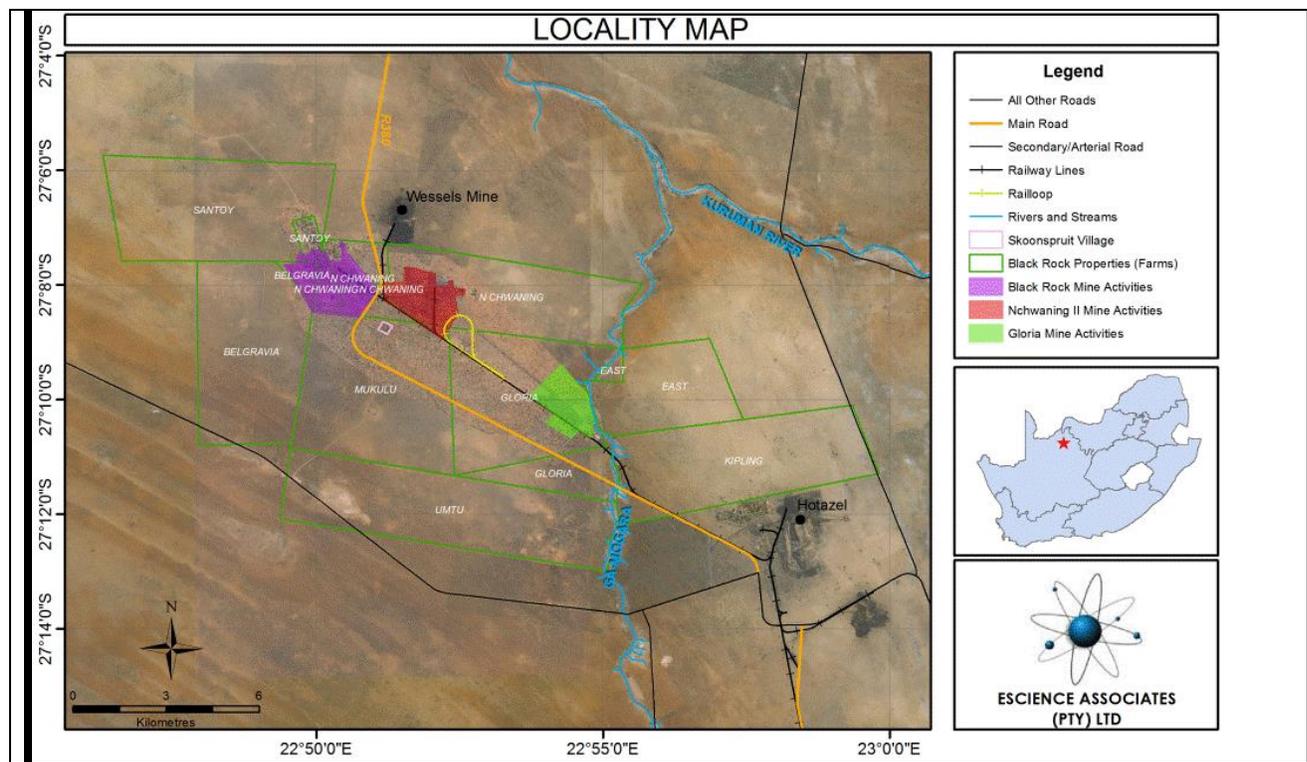
1 June 2020

**To whom it may concern**

**LETTER FOR HIA EXEMPTION REQUEST: PROPOSED ASSSSMANG BLACK ROCK MINING OPERATIONS (BRMO) RAIL LOOP TURNOUT EXTENSIONS, NORTHERN CAPE PROVINCE**

The above-mentioned project refers. Archaetnos CC was requested by E-Science Associated, on behalf of BRMO, to do an exemption request for the doing of an HIA for the project.

Assmang (Pty) Ltd mines manganese ore in the Black Rock area of the Kalahari, in the Northern Cape Province. The ore is mined from the Kalahari Manganese field. The Black Rock Mine Operations (BRMO) are approximately 80 kilometres north west of the town of Kuruman, and 12 kilometres north west of Hotazel. BRMO falls within the jurisdiction of the John Taolo Gaetsewe District Municipality (Figure 1).



**Figure 1: Locality of Assmang Black Rock Mine Operations (BRMO).**

The operations consist in the main of 3 mines and ancillary activities and developments related thereto. The three mines are:

- Black Rock mine
- Gloria mine, and
- Nchwaning mine

Black Rock mine consists mainly of supporting and ancillary services for the active mining and ore processing facilities at the Gloria and Nchwaning mines. Operations at Gloria were commissioned in 1975. Gloria complex is comprised of several mining and mining related activities. Operations at Nchwaning II were first commissioned in 1981. The Nchwaning II complex is comprised of several mining and mining related activities. Surface operations at Nchwaning III occur within the Black Rock operations.

The mined ore is processed at the Gloria and Nchwaning II surface plants prior to being transferred to product stockpiles for transportation. Product is loaded from the stockpiles onto train wagons and transported by rail to the market. An existing rail link line runs from BRMO to the Hotazel mainline. The link line passes over the Gamagara river to the south east of the Gloria mine.

**Project proposal:**

BRMO proposes to extend the turnouts at the Nchwaning II rail loop. The rail extension on the south side will exceed 300m. The extension on the northern side will exceed 300m, but the switchover will be less than 300m (Figure 2-3).

For this an HIA is needed, but since the area is entirely disturbed by past mining and infrastructure, it is believed that the project qualifies to be exempted from doing an HIA. Therefore, this exemption request was prepared.



**Figure 2: The railway loop indicating the three proposed changes in red.**



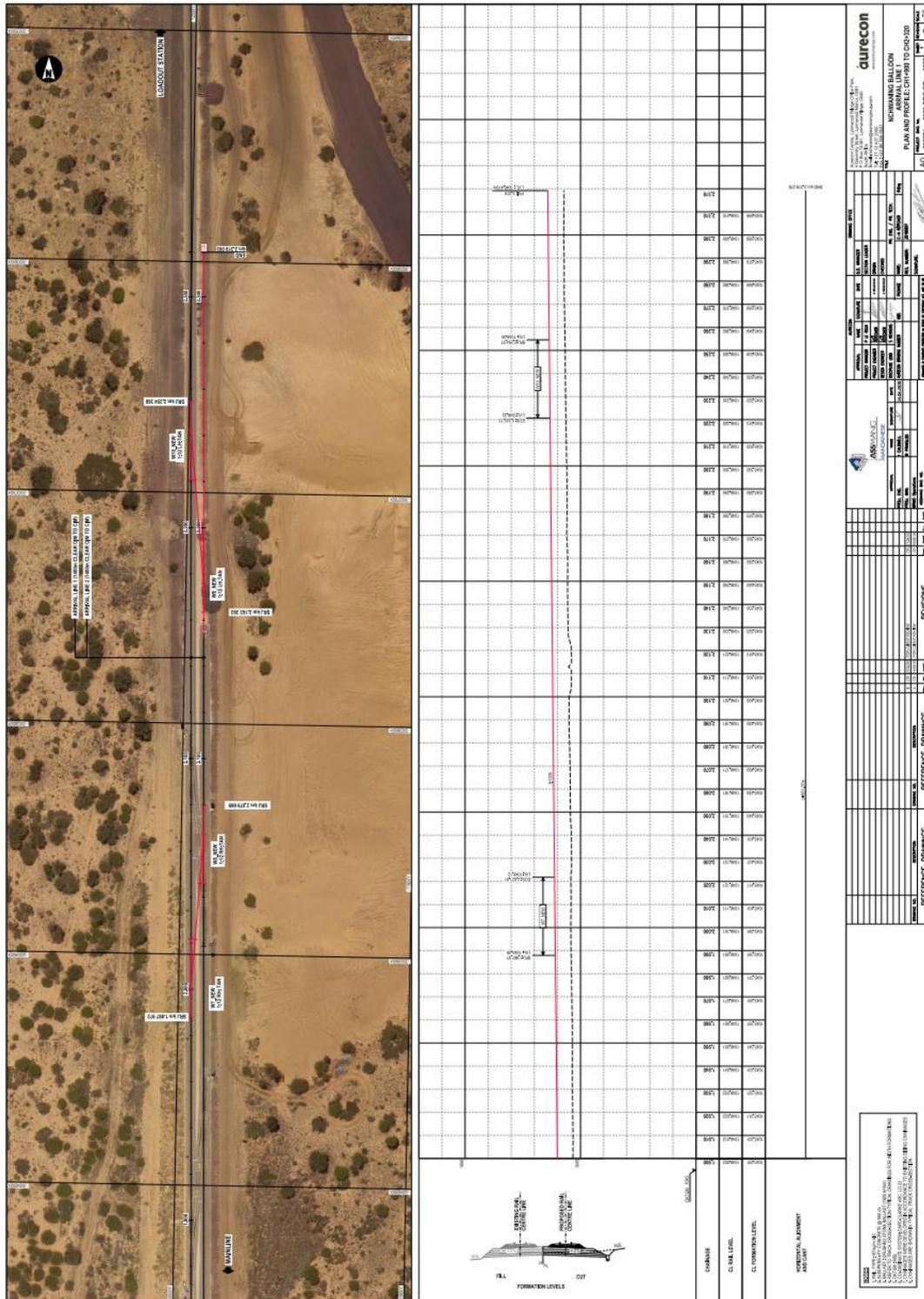


Figure 4: Detailed plan of the northern section of the proposed development (E-Science Associated).

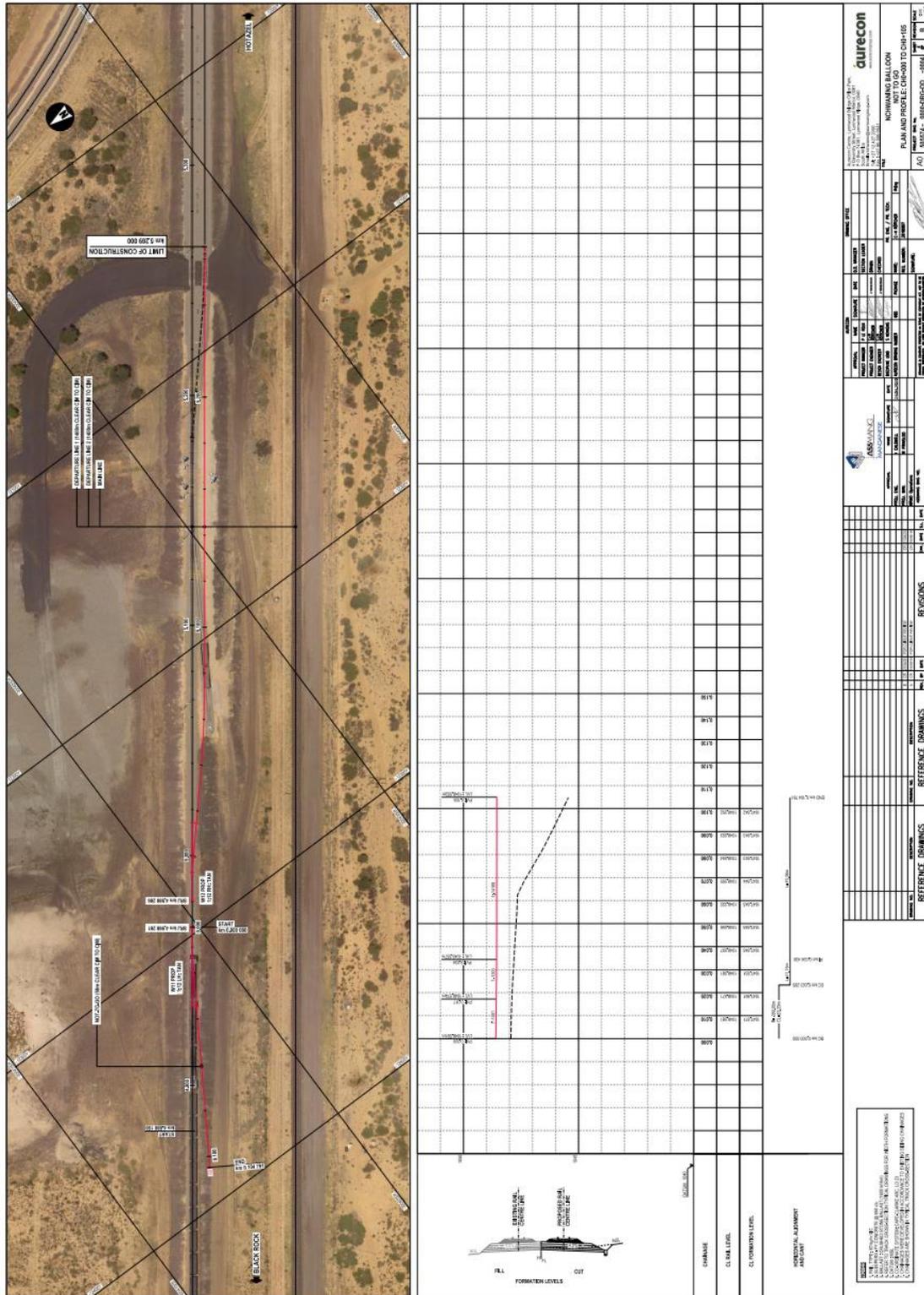


Figure 5: Detailed plan of the proposed development – southern section (E-Science Associated).

### Site study:

The site was studied via Google Earth images (Figure 6). However, Archaetnos has done extensive surveys over the last 6 years in the Hotazel area, including some studies along the railway line (Figure 7-8) and including an area around the rail loop.<sup>1</sup> It also needs to be noted that an HIA had been done here in 2009 by Küsel.<sup>2</sup> Although some Stone Age sites and two cemeteries were identified, these are outside of the perimeter of the proposed development.



**Figure 6: Clear Google Earth image indicating the site to be entirely disturbed.**

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<sup>1</sup> See Archaetnos database.

<sup>2</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).



**Figure 7: Track route of a survey done along the railway line by Archaetnos in 2019.<sup>3</sup> It covers the southern change to the railway loop.**



**Figure 8: Track route of a survey done along the railway line by Archaetnos in 2015.<sup>4</sup> It covers the area around and including the railway loop.**

<sup>3</sup> Van Vollenhoven, A.C & Smit, J. 2019. A report on a Heritage Impact Assessment for a proposed new overhead powerline from the Black Rock Mine to the Gloria Mine, close to Hotazel. Northern Cape Province. (Unpublished report, Groenkloof, Archaetnos).

<sup>4</sup> Van Vollenhoven, A.C & Collins, Z. 2015. A report on a Heritage Impact Assessment for the proposed Main

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 (Figure 9)
- It will be within the existing railway servitude
- An HIA was conducted in 2009 as well as between 2014 and 2019 in the wider area and although sites were identified these are not to be impacted on.
- There are mostly no natural vegetation on the route.
- Areas with vegetation is limited, but vegetation also is minimal.



**Figure 9: General view of the current railway and servitude close to Gloria Mine.**

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

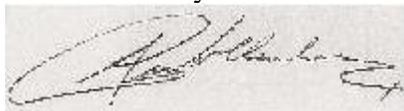
on site. In such a case work should cease immediately and an archaeologist should be contacted as a matter of urgency to assess such occurrences.

**Recommendation:**

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

I trust that you will find this in order.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A.C. van Vollenhoven', written over a light-colored rectangular background.

Prof AC van Vollenhoven: Director