



25 March 2019

To whom it may concern

LETTER FOR HIA EXEMPTION REQUEST: PROPOSED ASSSSMANG BLACK ROCK MINING OPERATIONS (BRMO) ALTERATIONS TO THE RAILWAY TRACK BETWEEN GLORIA MINE AND HOTAZEL, NORTHERN CAPE PROVINCE

The above-mentioned project refers. 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 (km) 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).

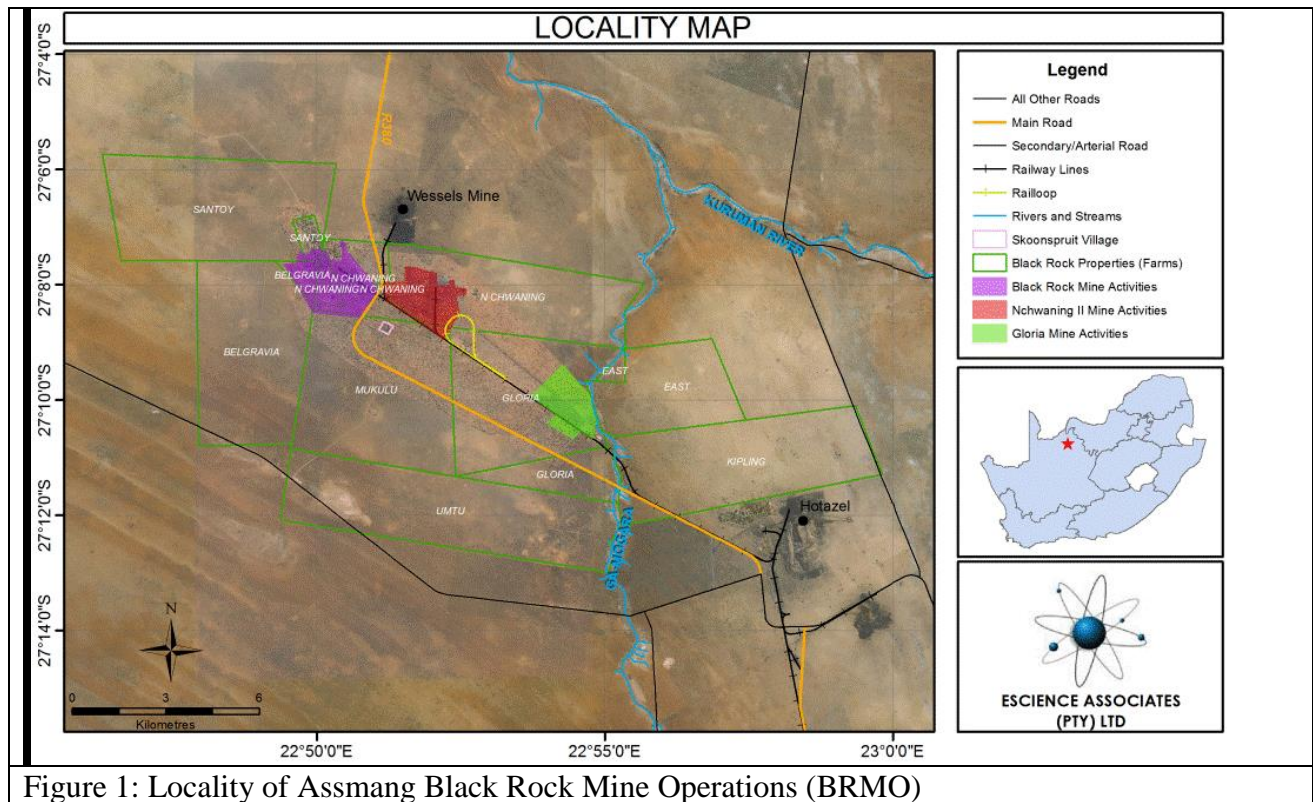


Figure 1: Locality of Assmang Black Rock Mine Operations (BRMO)

The 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. The rail bridge over the Gamagara river is lower than the surrounding land and therefore trains run through a dip as they cross the river. This significant change in elevation restricts the loads that can practically be transported by the mine due to the train engine power required to push trains through the dip.

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.

Project proposal:

BRMO proposes to build a new rail bridge adjacent to the existing bridge that will enable heavier loads to be transported via the rail link. For this an HIA is being prepared. The rail link will also be upgraded by building a new adjacent line within the existing rail line servitude of the link line (Figure 2). This exemption request is related to the latter.

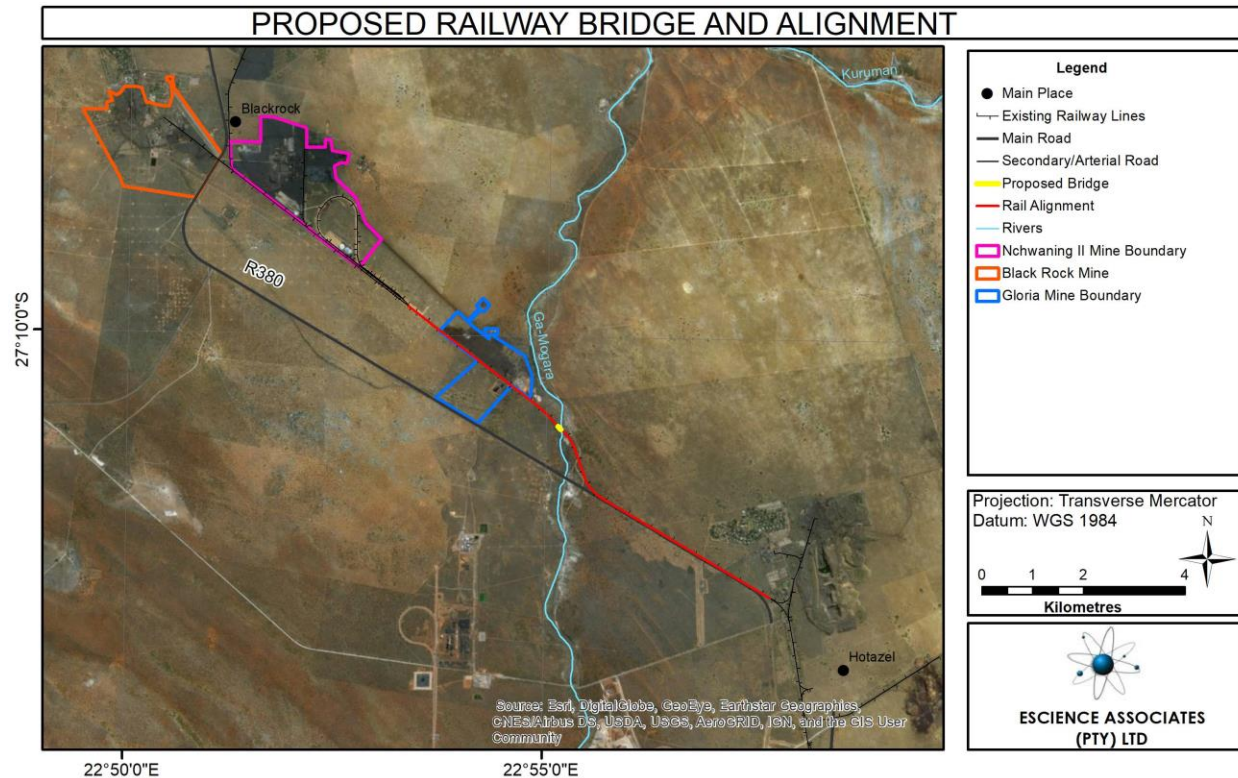


Figure 2: Proposed railway bridge and alignment.

Field work:

The site was visited on 12 March 2019 and the entire area was found to be disturbed (Figure 3-10). It also needs to be noted that an HIA had been done here in 2009 (Küsel¹) as well as various reports by Van Vollenhoven between 2014 and 2016². 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
- It will be within the existing railway servitude
- 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 mostly no natural vegetation on the route.
- Areas with vegetation is limited, but vegetation also is minimal.

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226 and Nchwaniing 267, at Black Rock, north of Kuruman, Kgalagadi District Municipality, Northern Cape Province.** (Unpublished report, African Heritage Consultants, Magalieskruin).

² See Archaeos database.

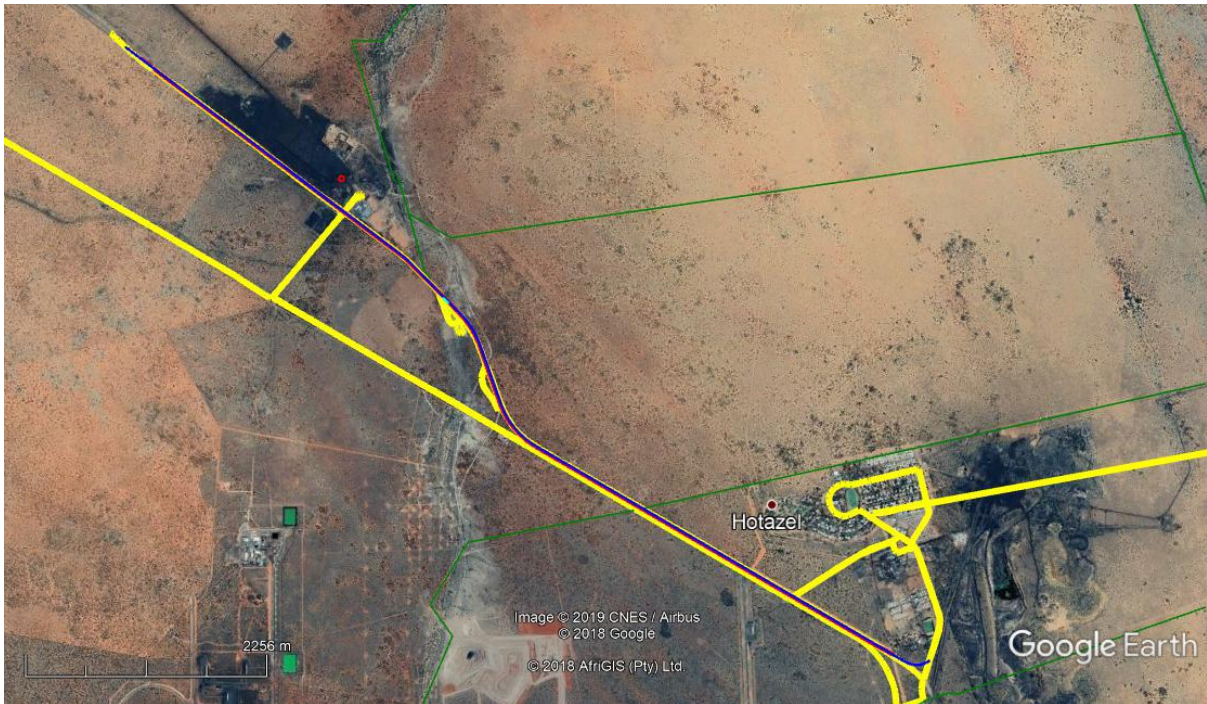


Figure 3: Track route of the survey done along the railway line.



Figure 4: General view of the current railway and servitude close to Gloria Mine.



Figure 5: View along the proposed railway alignment, central area.



Figure 6: View of limited vegetation along the proposed railway alignment.



Figure 7: Another view along the proposed railway alignment.



Figure 8: Proposed route alignment between provincial road and current railway.



Figure 9: View of area close to Hotazel.

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