



DIGBY WELLS
ENVIRONMENTAL



Environmental Authorisation for the Pamish Magnetite Project

Notification of Intent to Develop

Project Number:

VMC3049

Prepared for:

Pamish Investment No. 39 (Pty) Ltd

March 2015


Digby Wells and Associates (South Africa) (Pty) Ltd
(Subsidiary of Digby Wells & Associates (Pty) Ltd). Co. Reg. No. 2010/008577/07. Fern Isle, Section 10, 359
Pretoria Ave Randburg Private Bag X10046, Randburg, 2125, South Africa
Tel: +27 11 789 9495, Fax: +27 11 789 9498, info@digbywells.com, www.digbywells.com

Directors: AR Wilke, DJ Otto, GB Beringer, LF Koeslag, AJ Reynolds (Chairman) (British)*, J Leaver*, GE
Trusler (C.E.O)
*Non-Executive



This document has been prepared by Digby Wells Environmental.

Report Type:	Notification of Intent to Develop
Project Name:	Environmental Authorisation for the Pamish Magnetite Project
Project Code:	VMC3049

Name	Responsibility	Signature	Date
Justin du Piesanie Heritage Management Consultant: Archaeologist ASAPA Member 270	NID Compilation		11 March 2015

This report is provided solely for the purposes set out in it and may not, in whole or in part, be used for any other purpose without Digby Wells Environmental prior written consent.

TABLE OF CONTENTS

1	Introduction	1
1.1	Project Location.....	1
2	Project / Development Details	2
2.1	NHRA Section 38 Triggers	2
2.2	Activities.....	2
2.3	Additional Impact Assessment Process	3
3	Identified / Known Heritage Resources and Potential Impacts	3
3.1	Illustrative Material	6
4	Recommendation	6

1 Introduction

Pamish Investments No. 39 (Pty) Ltd (Pamish) are proposing to develop a new open pit Magnetite mine approximately 45 kilometres (km) northwest of Mokopane in the Limpopo Province (i.e. the Magnetite Project). The applicant is bound by national legislation to submit a Mining Right Application (MRA) to the Department of Mineral Resources (DMR), and simultaneously apply for Environmental Authorisation (EA) from the Department of Environmental Affairs (DEA). Digby Wells Environmental (Digby Wells) was appointed to undertake the environmental and social baseline studies required for the MRA and EA, according to national legislative requirements and international best practices standards and principles.

1.1 Project Location

Name of property/ies	Vogelstruisfontein 765 LR Vriesland 781 LR Vleigekraal 783 LR Schoonoord 786 LR Bellevue 808 LR
Street address or location	5 km east of the N11 2.5 km south of the R518
Erf or farm number/s	Vogelstruisfontein 765 LR Vriesland 781 LR Vleigekraal 783 LR Schoonoord 786 LR Bellevue 808 LR
Coordinates of approximate centre of project area	S 23° 53' 21.21" E 28° 47' 55.83"
Town or District	Mokopane
Responsible Municipality	Mogalakwena Local Municipality
Maximum extent of proposed development	10 109 ha
Current use	Tribal land
Predominant land use/s of surrounding properties	Residential, Agricultural, Mining



2 Project / Development Details

The proposed Magnetite Project is a greenfields operation situated approximately 33 km north-west of Mokopane, within a rural setting. The prospecting right area comprises several farms, namely Vogelstruisfontein 765 LR, Vriesland 781 LR, Vleigekraal 783 LR, Schoonoord 786 LR and portions Re/1, Re/2, 3, 4, 5 and 6 of the farm Bellevue 808 LR. Probable project- affected villages include Ditlotswana, Malokong, Mosate and Sepharane.

The Pamish Investment No. 39 (Pty) Ltd has to date undertaken the following activities within the limits of the EMP approved in accordance with the MPRDA.

2.1 NHRA Section 38 Triggers

The following aspects of Section 38 of the NHRA may be triggered by the proposed project.

		NHRA Section 38 (1) Activities / Triggers	Summary description (e.g. 500 m conveyor belt, open cast pit, etc.)	
<input checked="" type="checkbox"/>	a	Any linear development or barrier >300 m	Development and use of access routes and pipelines.	
<input type="checkbox"/>	b	Any bridge or similar structure >50 m		
<input checked="" type="checkbox"/>	c	Any development or activity that will change the character of a site:		
	<input checked="" type="checkbox"/>	i	≥5 000m ² in extent	Development of two open pits, waste rock dumps, tailings dams, pollution control dams and water storage
	<input type="checkbox"/>	ii	Involving ≥3 existing erven/ subdivisions	
	<input type="checkbox"/>	iii	Involving ≥3 or more erven/ divisions consolidated within past 5 years.	
<input checked="" type="checkbox"/>	d	Rezoning of a site ≥10 000 m ² in extent.	Rezoning of agricultural land for mining purposes.	
<input checked="" type="checkbox"/>	e	Other triggers, e.g.: in terms of other legislation, (i.e.: National Environment Management Act, etc.)	MPRDA, NEMA, NWA NEMA EIA Regulation 2014	

2.2 Activities

The following activities will take place during the lifespan of the proposed project.

Construction	Operation	Decommissioning and Closure
Site clearance and vegetation removal	Development of two open pits	Rehabilitation of project area
Topsoil removal and stockpiling	Development of Waste Rock Dumps	



Construction	Operation	Decommissioning and Closure
Development and use of access	Mine operation	
Construction of infrastructure	Mineral processing	
	Operation of tailings dams, pollution control dam, water storage and associated pipelines	
	Storage of fuels, process concentrate and maintenance oils	
	Waste generation, storage and disposal	
	Product storage	
	Rail siding for transport of product	
	Employment of construction and operational mine workers	

2.3 Additional Impact Assessment Process

The following impact assessment process/es are currently being undertaken for the proposed project.

Legislation, i.e. NEMA, MPRDA, etc.	NEMA, MPRDA, NWA
Consenting Authority that has/will receive information	Department of Mineral Resources (DMR)
Present phase of process at Authority, e.g. Draft Scoping Report	Draft Scoping Report

3 Identified / Known Heritage Resources and Potential Impacts

The following categories of heritage resources as defined in Section 3 of the NHRA are known to occur within the proposed project area.

<input checked="" type="checkbox"/>	3(2)(a)	Places, buildings, structures and equipment of cultural significance
		<u>Description of resource:</u> Although no such resources have yet been identified, there is a likelihood that such resources may exist within the project area.

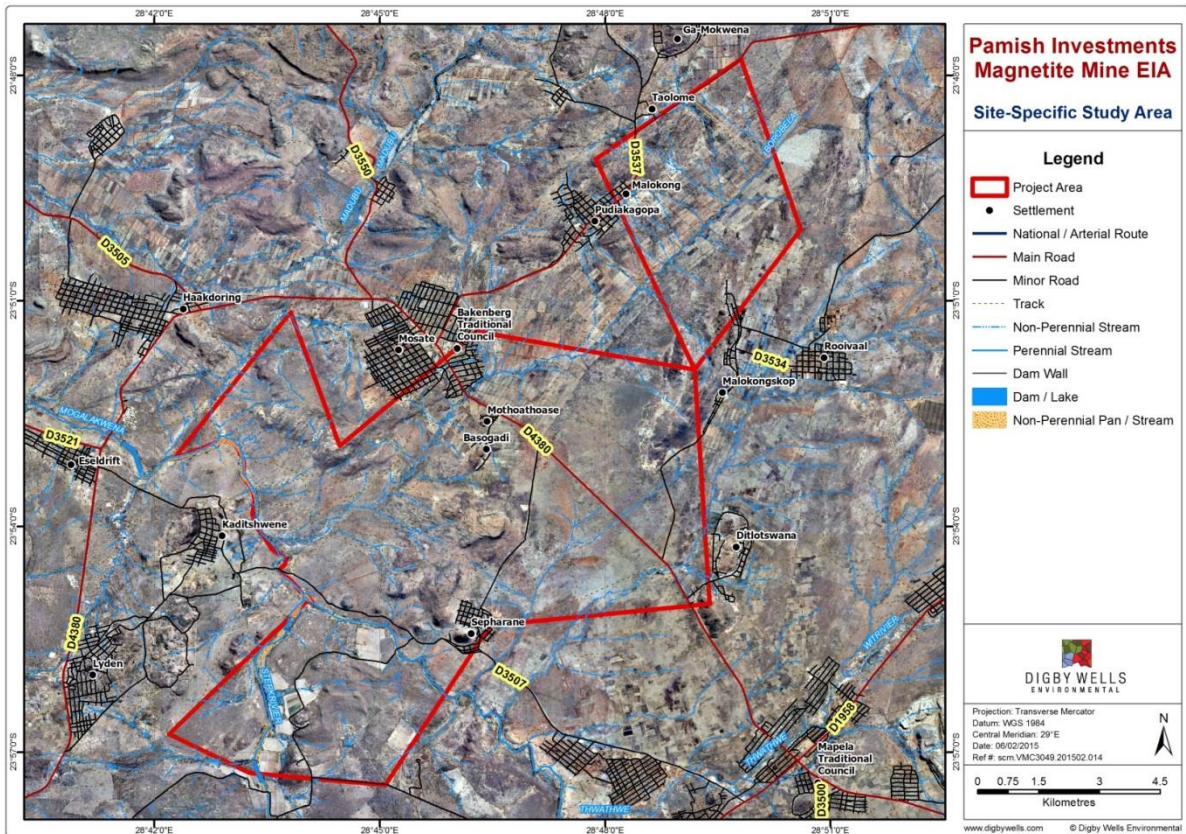


		<u>Potential impact:</u> Undetermined at present.
☒	3(2)(b)	Places to which oral traditions are attached or which are associated with living heritage
		<u>Description of resource:</u> The project area is situated within rural tribal land. Various places and spaces with possible intangible heritage may be present, such as ancestral settlement sites and places where rites of passage take place.
		<u>Potential impact:</u> Undetermined at present, but may include restricted access, loss of sites and natural resources associated with living heritage that may lead to degradation of cultural significance of places.
☒	3(2)(c)	Historical settlements and townscapes
		<u>Description of resource:</u> Area is associated with the historic settlement and movements of the Langa and Kekana Ndelebe, as well as various conflict episodes.
		<u>Potential impact:</u> Changes to historic settlements that could change the sense of place and significance to descendant communities.
☒	3(2)(d)	Landscapes and natural features of cultural significance
		<u>Description of resource:</u> Descendant communities residing in the area may attach cultural significance to various landscape features including hills and spaces associated with their ancestral history. Possible palaeo-surface water features such as palaeo pans and river courses that may contain significant Stone Age material and sites.
		<u>Potential impact:</u> Possible restricted, or loss of, access to such features; possible changes in perception of significance among descendant and local communities. Changes to the integrity of in situ deposits in palaeo-surface water features.
☒	3(2)(e)	Geological resources of scientific or cultural importance
		<u>Description of resource:</u> Limited extent of karst geology
		<u>Potential impact:</u> No impact is envisaged on the karst geology.
☒	3(2)(f)	Archaeology and/or palaeontology (<i>Including archaeological sites and material, fossils, rock art, battlefields & wrecks</i>)



		<p><u>Description of resource:</u> Heritage resources spanning from the Stone Age through to the historic period have been identified in the study area.</p>
		<p><u>Potential impact:</u> Changes to the current conservation status and integrity of <i>in situ</i> sites, features and artefacts.</p>
<input checked="" type="checkbox"/>	3(2)(g)	<p>Graves and burial grounds</p> <p><u>Description of resource:</u> Burial grounds and graves have been recorded within the project area.</p> <p><u>Potential impact:</u> Changes to the current conservation status and cultural significance of gravesites, that may also result in social repercussions associated with descendants of the deceased.</p>
<input checked="" type="checkbox"/>	3(2)(a)	<p>Other human remains</p> <p><u>Description of resource:</u> None identified, but likelihood that human remains associated with archaeological sites may be found during the course of project development.</p> <p><u>Potential impact:</u> Accidental exposure and possible destruction of archaeological burials and remains.</p>
<input type="checkbox"/>	3(2)(h)	<p>Sites of significance relating to the history of slavery in South Africa</p> <p><u>Description of resource:</u> No concrete evidence of the accepted definition of South African slavery exists in the region.</p> <p><u>Potential impact:</u> None</p>
<input type="checkbox"/>	3(2)(i)	<p>Movable objects</p> <p><u>Description of resource:</u> No culturally significant moveable objects other than artefacts associated with archaeological sites have been identified.</p> <p><u>Potential impact:</u> None</p>

3.1 Illustrative Material



4 Recommendation

Is a Heritage Impact Assessment required?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If NO, provide motivation:			
If YES, provide suggested components that may be required or undertaken during HIA.			
<input checked="" type="checkbox"/>	Archaeology	<input type="checkbox"/>	Architecture
<input checked="" type="checkbox"/>	Built Environment	<input checked="" type="checkbox"/>	Burial Grounds and Graves
<input type="checkbox"/>	Palaeontology	<input checked="" type="checkbox"/>	Public Participation
<input type="checkbox"/>	Townscapes	<input checked="" type="checkbox"/>	Visual Impact
<input type="checkbox"/>	Other:		
<p>Based on our understanding of the cultural landscape and the identified heritage resources within the project area, Digby Wells recommends the following:</p> <ul style="list-style-type: none"> ■ Exemption from further palaeontological assessments for the proposed infrastructure 			



footprint as the palaeo-sensitivity is insignificant. However, specialist geohydrological studies should be integrated into the HIA to determine if the potential karst topography could be affected.

- An HIA be undertaken that includes the following heritage components:
 - An Archaeological Impact Assessment including reconnaissance to identify and record archaeological resources within the impact footprint;
 - An assessment of burial grounds and graves including reconnaissance to identify, record and document all burials that may exist in the impact footprint;
 - Integration of additional specialist studies to determine any possible living heritage in the project area. Studies that may be considered for integration include Social Impact Assessment, Biophysical Assessment and Visual Assessment.

Recommendation made by:

Name: Justin du Piesanie

Capacity: Heritage Management Consultant: Archaeologist