



Prescali Environmental Consultants (Pty) Ltd
P.O Box 2544
Montana Park
0159
Tel: 012 543 3808
Fax: 086 621 0294
www.prescali.co.za
Date: 24 February 2021

South African Heritage Resource Agency
111 Harrington Street
Cape Town
P.O Box 4637
Cape Town
8001

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za

Case ID: 15975

RE: Comments on Salene Manganese (Pty) Ltd prospecting Right application. For the following Minerals: Aluminium, Silver, Arsenic, Barium, Bismuth, Cerium, Cobalt, Copper, Potassium, Lanthanum, Nickel, Phosphorus, Lead, Rubidium, Sulphur, Scandium, Silicon, Strontium, Titanium, Vanadium, Zink, Rare Earth Elements, Lithium Located on: Jenkins 562, Gappenpin Reserve 670,, Mashwening 557 (vanadium excluded), Helpebietjie 738, Kadgame 558, Bishop 671, Morokwa 672, Lomoteng 669, Magoloring 668, Vlakfontein 433, Doornfontein 446 (vanadium excluded), Farm 447, Farm 476, Lohathla 673, Goucester 674, Driehoekspan 435, Farm 434, Kapstewel 436, Farm 445, Farm 450, Beesthoek 448, Olkynfontein 475, Mokinging 560, Farm 431, Farm 478, Farm 477, Farm 485, Farm 486, Ploegfontein 487, Leeuwfontein 488, Strydfontein 614, Klipbank 489, Kapstewel 541, portion of \ Pensfontein 449, Portion 1 and the remainder of Macarthy 559 within the administrative district of Postmasburg, Northern Cape Province DMRE Reference Number: NC30/5/1/1/2/12630 PR

Dear Natasha

We would like to acknowledge and note comments received from the South African Heritage Resources Agency (SAHRA) dated 11 February 2021 for Salene Manganese (Pty) Ltd for the proposed prospecting activities for various minerals on various properties within the Postmasburg area with DMRE reference number: NC 30/5/1/1/2/12630 PR.

Summary of comments.

*As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations as amended, it is incumbent on the developer to ensure that a **Heritage Impact Assessment (HIA)** is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA. This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted **as part of the EA Application** in terms of NEMA and the NEMA EIA Regulations.*

SAHRA requests that an assessment of the impacts to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as part of the EA process.

The assessment must include an assessment of the impact to archaeological and palaeontological resources. The assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological



Components of Impact Assessment Reports (see www.asapa.co.za or www.aphp.org.za for a list of qualified archaeologists).

Response

As the appointed Environmental Assessment Practitioners for this project, Prescali Environmental Consultant is of the opinion that a heritage impact assessment is not necessary for phase one of the proposed prospecting activities due to the following reasons we would like for you to consider:

- The area that will be sampled has already disturbed, samples that will be collected was mined previously and stockpiled as residue deposit.
- It is assumed that the respective mining companies have conducted heritage studies in their properties before commencing with mining activities, it is therefore not necessary to conduct another study for the proposed sampling activities.
- The combined footprint that will be disturbed by the sampling activities will be about 250-500 m². In terms of the National Heritage Resources Act Section 38 (1) (c) (i) which states that any activity exceeding 5 000 m² in extent.
- Should Phase 2 of the proposed prospecting activities be necessary (i.e., drilling and bulk sampling) a Heritage Impact Assessment will be conducted on the affected properties.

In conclusion, we request that you re-evaluate the request for the HIA which include an archaeological and paleontological assessment based on the above reasons and recommend that should phase 2 of the prospecting be implemented as part of the EMPr the HIA must be conducted.