

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 11053

Date: Friday June 02, 2017  
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## Interim Comment

### In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)

Attention: Adomamanzi Pty Ltd

**Adomamanzi Pty (Ltd) (Adomamanzi) has commenced with a process to apply for prospecting rights over a total area of approximately 230 hectares in the Northern Cape, South Africa. The prospecting application is located approximately 54 kilometres west of Garies, and 122 kilometres southwest of Komaggas, within the Kamiesberg Local Municipality which falls under the Namaqua District Municipality. Adomamanzi is investigating and exploring the feasibility of a diamond mine and bulk sampling across an area that covers portions of land in the Northern Cape. Prospecting activities will be undertaken over a period of 60 months and the application is for both invasive and non-invasive methods.**

The South African Heritage Resources Agency would like to thank you for submitting the scoping report for the Admiralty Reserve Prospecting Right Application in the Kamiesberg Local Municipality in the Namaqua District, Northern Cape. The proposed prospecting for diamonds will entail activities in the sea and on land and will be located from the area which extends from the western boundary of Farm Eiland Punt Noord No 549 to the eastern boundary of Concession Area 9A.

In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years and any wreck being any vessel or aircraft or any part thereof older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that before such sites are disturbed by development 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 NHRA. This must include archaeological, maritime archaeological and palaeontological components. The HIA must be conducted as part of the of the Environmental Authorisation Application in terms of the National Environmental Management Act, No 107 of 1998 (NEMA) and the NEMA EIA Regulations 2014 for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

The quickest process to follow for the archaeological component would be to contract a specialist (see [www.asapa.org.za](http://www.asapa.org.za)) to provide a Phase 1 Archaeological Impact Assessment Report. The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make

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recommendations (as indicated in section 38) about the process to be followed. For example, there may need to be a mitigation phase (Phase 2) where the specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of the sites. If the property is very small or disturbed and there is no significant site the specialist may choose to send a letter to the heritage authority to indicate that there is no necessity for any further assessment.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary (see [www.palaeontologicalsociety.co.za](http://www.palaeontologicalsociety.co.za) for qualified palaeontologists). Any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed. All environmental reports and appendices produced as part of the EA application process must be submitted to the SAHRIS Case file in order for an informed comment to be issued.

With regard to maritime and underwater cultural heritage it is important to note that the number of known shipwrecks along the South African coast is approximately 2500, the positions of the large majority of these are not known, only that they occurred and an approximate location. The nearest recorded wreck is that of the Namaqua 1 which lies just south of the development area off Island Point. While there are no known shipwrecks within the development area there is always the potential for unknown wrecks to be present on the seabed, so if anything of archaeological or paleontological significance is exposed either during survey work or work on the seabed SAHRA requests to be informed of its discovery. The scoping report was not clear on the level of geophysical survey to be undertaken of the seabed, it is recommended that multibeam or sidescan sonar surveys be conducted before any work commences and that these results are made available to an archaeologist for viewing.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Briege Williams  
Heritage Officer  
South African Heritage Resources Agency

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John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/398563>  
(DMR, Ref: NC/2017/11935)

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.