



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: nhiggitt@sahra.org.za  
CaseID: 10726

Date: Friday October 06, 2017  
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## Interim Comment

### In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: SLR Consulting (Africa)

P O Box 1596  
Cramerview, 2060, South Africa

**The mine holds a mining right (NC/30/5/1/2/2/0206MR) and an Environmental Management Programme (EMP) issued and approved by the Department of Minerals and Energy (currently the Department of Mineral Resources), an environmental authorisation (EA) (NC/KGA/KATHU/37/2008) issued by the Department of Tourism, Environment and Conservation (currently the Department of Environment and Nature Conservation) and an Integrated Water Use License (IWUL) (10/D41K/AGJ/1735) issued by the Department of Water Affairs (currently the Department of Water and Sanitation). In terms of environmental law, the approved EMP is now deemed to be an EA. Tshipi is in the process of amending its approved EMP to cater for changes to its approved infrastructure layout. In accordance with Section 21 of the National Water Act (No 36 of 1998), the existing IWUL will also need to be amended to cater for the proposed changes.**

SLR Consulting (Africa) has been appointed by Tshipi é Ntle Manganese Mining (Pty) Ltd to manage the Environmental Management Programme (EMPr) amendment process for the operational Tshipi Borwa Mine located on the farms Mamatwan 331 and Moab 700, near Hotazel, Northern Cape Province.

A Scoping and Environmental Impact Assessment (S&EIA) process will be followed in terms of the Environmental Authorisation Application in terms of the National Environmental Management Act, 1998 (NEMA) 2014 Environmental Impact Assessment (EIA) Regulations, for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (as amended). The EMPr /Environmental Authorisation (EA) amendment process will cater for changes to infrastructure layouts at the Tshipi Borwa Mine including changes to the waste rock dumps, stormwater dams, stockpiles, expansion of approved topsoil stockpile and extension of approved railway siding.

In an Interim Comment issued on 27 March 2017, SAHRA requested that a Desktop HIA inclusive of a Palaeontological Desktop Assessment be conducted for the project.

*Fourie, W. 2017. Opinion pertaining to the infrastructure changes to the surface infrastructure layout for the Tshipi Borwa Mine near Hotazel, in the John Toalo Gaetsewe District Municipality, Northern Cape Province.*

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The heritage specialist stated that the proposed changes to the mine surface layout pose no impact to heritage resources, as the only heritage resource identified within the footprint has since been removed as per recommendations in 2009.

*Butler, E. 2017. Palaeontological Desktop Assessment for surface and infrastructure layout changes (EMP Amendment Process) for the Tshipi Borwamine near Hotazel, in the John Toalo Gaetsewe District Municipality in the Northern Cape Province.*

The development area is underlain by the Late Cenozoic Kalahari Formation. No known fossil sites are located near the proposed development. The amendment to the mine infrastructure will not impact the Kalahari Formation and is unlikely to pose a threat to palaeontological heritage.

Recommendations provided in the report include the following:

- However, should fossil remains be discovered during any phase of construction, either on the surface or exposed by fresh excavations, the ECO responsible for these developments should be alerted immediately. Such discoveries ought to be protected (preferably in situ) and the ECO should alert SAHRA (South African Heritage Research Agency) so that appropriate mitigation (e.g. recording, sampling or collection) can be taken by a professional paleontologist;
- The specialist involved would require a collection permit from SAHRA. Fossil material must be curated in an approved collection (e.g. museum or university collection) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA.

## Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the PIA be amended to include an official Council of Geoscience map of the geology of the development area. Further comments will be issued upon receipt of the above.

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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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/387782>  
(DMR, Ref: )