

Our Ref:



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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CaseID: 12241

Date: Friday March 02, 2018  
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## Interim Comment

### In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Saxon Heavy Minerals (Pty) Ltd

Office 301 3rd Floor Eikestad Mall 43 Andringa Street  
Stellenbosch  
7599

**This application relates to the Prospecting Right Application in terms of the Mineral and Petroleum Resources Development Act, Act 28 of 2002 (MPRDA) by Saxon Heavy Minerals (Pty) Ltd. The purpose of the prospecting programme is to establish the presence of economic deposits of heavy minerals on three farms located in the Namakwa Registration District, namely the Remainders of Farms No. 495, 496 and 489, Hondeklipbaai, Northern Cape**

CTS Heritage has been appointed by PHS Consulting to conduct a Heritage Impact Assessment (HIA) as part of an Environmental Authorisation (EA) application and Prospecting Rights Application on the Remainders of Farms No. 495, 496 and 489, Hondeklipbaai, Northern Cape. The HIA will form part of a Environmental Impact Assessment (EIA) process as per section 38(8) the National Heritage Resources Act, Act 25 of 1999 (NHRA), the National Environmental Management Act, 1998 (NEMA) and the NEMA EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The application area is 7 437, 21 ha and will include hand augering and RC Drilling on previously mined areas. Access to the drill sites will be made via existing farm roads or fence line tracks wherever possible.

*Pether, J. 2018. Palaeontological Assessment (Desktop Study) Saxon Heavy Minerals (Pty) Ltd. Proposed Heavy Mineral Sand Prospecting on the Namaqualand Coastal Farms Lang Klip 489, Mitchells Bay 495 and farm 496.*

The proposed drilling will impact coastal-plain aeolian and marine formations of the West Coast Group of various Miocene, Pliocene and Quaternary ages.

Fossils most likely to occur include land snails, tortoise bones and mole bones. Some fossil shells that may be diagnostic of the marine formation encountered may be present in some drill holes. Other possible fossils include shark, fish teeth and casts of shells. Displaced fossil bones may be found on the overburden dumps or eroding out of the mine pits. The overall impact of the prospecting is considered to be low.



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Recommendations provided in the report include the following:

- It is recommended that a requirement to be alert for possible fossil materials and archaeological material be included in the Environmental Management Plan (EMP) for the proposed prospecting operations;
- Additional requirements include the implementation of an archaeological and palaeontological awareness programme;
- Implementation of the Fossil Finds Procedure (FFP) in the event of fossil bone material being encountered on overburden dumps or in mine pits;
- In addition to the above proposed mitigatory measures, all core samples will be sifted on site to separate heavy minerals from the matrix. At this point, all palaeontological or archaeological material contained in the cores will be identified by the on-site geologist who will bag the finds, recording the GPS co-ordinates of the core sample from which they are derived. This material will then be sent to Cape Town for analysis by professional researchers. In the event that subsurface archaeological deposits are encountered, these can be red flagged, and then avoided to prevent further damage. For the palaeontological samples, this coring will serve to positively identify the location of sensitive fossils within a landscape of highly sensitivity geological deposits;
- Upon notification of a potential fossil find, SAHRA and an appropriate specialist palaeontologist will assess the information and liaise with the developer, the environmental consultants and the ECO and a suitable response will be established.

*Wiltshire, N. 2018. Desktop Heritage Impact Assessment in terms of section 38(8) of the NHRA for the Mitchell's Bay Minerals Prospecting Rights Application, south of Hondeklipbaai, Northern Cape.*

A total of 370 heritage resources are located within the proposed prospecting area. These include shell middens, occupation sites and artefact scatters. The Spoegrivier Cave, where extensive research has been undertaken since 1997 until 2002, is located within the prospecting area. A total of 52 drill sites are planned for the Spoegrivier bufferzone.

Recommendations provided in the report include the following:

- Restrict coring to previously disturbed areas;
- A red flag area of 300 m from the high water mark and 2 km around the Spoegrivier Cave is imposed where extra care is taken in terms of avoiding impacts to significant archaeological resources. This includes restricting prospecting to hand augering (only 52 holes in this area); a no prospecting area of 1.5 km around Spoegrivier Cave; and the inclusions of an archaeological and palaeontological

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- awareness programme should be implemented prior to prospecting taking place on site;
- A Fossil Finds Procedure must be implemented for the Prospecting Phase;
  - It is also recommended that a detailed HIA be required before any bulk sampling, mining or RC Drilling in undisturbed areas can take place during subsequent phases of the project and that a site management plan be drawn up specifically dealing with heritage impacts in the integration of the EMP;
  - If *in situ* archaeological resources or human burials are found, work must cease and these findings must be reported to the Northern Cape Provincial Heritage Resources Authority and SAHRA, and a suitably qualified archaeologist must be contacted.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests draft Basic Assessment and all appendices must be submitted along with the above reports so that an informed comment may be issued. Additionally, Appendix 1-3 of the HIA must be uploaded.

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

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

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/488407>  
(DMR - NC, Ref: )