

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 12818

Date: Tuesday December 18, 2018  
Page No: 1

## Interim Comment

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

Attention: Miss yvonne guтона

**Ilmenite, Zircon, Rutile, Spinel, Monazite, Garnet, Leucoxene, phosphate and potassium Prospecting is proposed to take place on the farms Koingnaas 475, Zwart Lintjes Rivier 484, Hondeklipbaai and Lang Klip 489 Namakwaland Magisterial District, Western Cape trending from 15km South of Hondeklipbaai to 15km North of Hondeklipbaai.**

Archean Resources (Pty) Ltd have been appointed by West Coast Resources (Pty) Ltd to conduct an Environmental Authorisation (EA) Application and Prospecting Right Application for proposed heavy mineral sand prospecting on Koingnaas 475, Zwart Lintjes Rivier 484, Hondeklipbaai and Lang Klip 489 Namakwaland Magisterial District, Northern Cape Province.

This case is related to SAHRIS Case ID 12371 (<https://www.sahra.org.za/sahris/cases/ncs-3051121-12135pr>) which was refused by SAHRA on the 28/05/2018.

A Basic Assessment Report (BAR) will be conducted in terms of the National Environmental Management Act, No 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended). The proposed prospecting will include surface sampling (65 samples), reconnaissance drilling (220 holes), temporary access roads, and a temporary office area.

ACO Associates cc and Dr John Pether were appointed to provide the heritage specialist component as part of the BAR in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Pether, J. 2018. Palaeontological Assessment (Desktop Assessment): Proposed Heavy Mineral Sand Prospecting on the Namaqualand Coastal Farms Koingnaas 475, Zwart Lintjes River 484, Hondeklipbaai State Land, Avontuur 488 Ptns 1, 2 &5, Lang Klip 489 Mine Area.*

The proposed prospecting area is underlain the Dorbank Formation, Olifantsrivier Formation, Graauw Duinen Formation, Miocene aeolianite formation, and the Koingnaas Formation, with late Quaternary sands covering the majority of the area. The proposed prospecting will sample the above mentioned formations. The drilling



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will have a low to marginal impact to fossil material.

Recommendations provided in the report include the following:

- It is recommended that a requirement to be alert for possible fossil materials and archaeological material exposed in interdune blowouts, or in areas disturbed by mining (deflating dumps, eroding sides of excavations), be included in the Environmental Management Plan (EMP) for the proposed prospecting operations;
- Due to the scarcity of fossils in the Project Area it is important that such ephemeral opportunities to rescue fossil bones and buried archaeology must not be overlooked. Such discoveries will result in a positive impact for palaeontology arising from the proposed prospecting operation;
- Implementation of an archaeological and palaeontological awareness programme;
- Implementation of the Fossil Finds Procedure;
- Small fossils or archaeological finds may be encountered when sieving the sand samples prior to analysis. It is recommended that such material be kept and bagged, recording the details of the sample as for a fossil find. These samples should be examined by a specialist and possible finds of importance deposited in a curatorial institution.

*Hart, T. 2018. Heritage Impact Assessment: Contribution to Basic Assessment for heavy minerals Prospecting Rights, West Coast Resources Namaqualand Mines.*

The report notes that the proposed prospecting area contains Early Stone Age, Middle Stone Age and Later Stone Age sites including shell middens and open air sites, colonial period sites and historical mining sites. The report indicated that proposed prospecting is unlikely to impact archaeological sites due to the small size of the area of disturbance.

Recommendations provided in the report include the following:

- In the layout of the prospecting areas, technicians should try to avoid any areas where there a scatter of piles of marine shell and stones which indicate a midden. Any such occurrences should be avoided, the position logged and photographed.

In an Interim Comment issued on 18/09/2018, SAHRA requested that a list of all identified heritage sites located within the proposed prospecting area be submitted to the case as noted in the submitted report. The

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list must include an assessment of the site's significance and the impact of the development of these sites. A map showing the location of the sites in relation to the proposed prospecting areas as shown on page 3 of the report must also be provided. All other requirements of section 38(3) must be complied with, as the prospecting application falls under section 38(8) of the NHRA, and therefore section 38(1) triggers do not apply in this case.

In a response letter to SAHRAs Interim Comment, the heritage specialist requested that SAHRA reconsider the need for a list of heritage sites, citing high costs to complete the task.

#### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has considered the letter the specialist submitted to the case and has decided not to retract the Interim Comment issued on the 18/09/2018. Considering the fact that the application does not trigger section 38(1), it is a section 38(8) application, and therefore the size of the project has no bearing on the application. The applicant must comply with the comment as per section 38(3) and section 38(8) of the NHRA.

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/510969>  
(DMR - NC, Ref: )