

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: 12819

Date: Tuesday September 18, 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: Miss yvonne gutoona

**The proposed Ilmenite, Zircon, Rutile, Spinel, Monazite, Garnet, Leucosene, phosphate and potassium prospecting will be on the farms Portion 0 of Twee Pad 176, Portion 0 of Dreyers Pan 192 and Portion 5 of Annex Kleinzee B 193 Namakwaland Magisterial District, Western Cape trending from immediately north of Kleinzee to 20km south of Port Nolloth**

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 prospecting on portion 0 of Twee Pad 176, Portion 0 of Dreyers Pan 192 and Portion 5 of Annex Kleinzee B 193, near Kleinzee, Northern Cape Province.

This case is related to SAHRIS Case ID 12370 (<https://www.sahra.org.za/sahris/cases/ncs-3051121-12133pr>) 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 (100 samples), reconnaissance drilling (150 holes), temporary access roads, and a temporary office area.

Dr John Pether was appointed to provide the palaeontological 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 Annex Kleinzee 193, Dreyers Pan 192 and Tweepad 176.*

The proposed prospecting area is underlain by the Hondeklipbaai Formation, Olifantsrivier Formation, Avontuur Formation, Graauw Duinen Formation, and Kleinzee Formation with compacted aeolianite and pan deposits, while late Quaternary sands covering the majority of the area. The drilling will have a low to marginal impact to fossil material.

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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 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.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a Heritage Impact Assessment (HIA) that assesses the impact of the proposed prospecting on archaeological resources be submitted as part of the BAR process. The HIA must comply with section 38(3) of the NHRA.

Additionally, the BAR and appendices be uploaded to the case so that an informed comment may be issued.

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/510970>  
(DMR - NC, Ref: NCS 30/5/1/1/2/1 12133PR)