

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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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
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CaseID: 12973

Date: Thursday July 04, 2019  
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## Final Comment

### In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Berend van Deventer  
Alidabix (Pty) Ltd

**Alidabix (Pty) Ltd has applied for a Prospecting Right to prospect for Copper, Zinc, Gold, Silver, Diamonds General, Diamonds Alluvial, Diamond in Kimberlite, Molybdenum, Nickel and Platinum Group Metals over Portion 3 (a portion of Portion 1 - Stomp Oor A) of the Farm Stomp Oor 109, Prieska District, Northern Cape Province.**

M and S Consulting (Pty) Ltd has been appointed by Alidabix (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for a Prospecting Right Application for prospecting activities on Portion 3 (a portion of Portion 1 - Stomp Oor A) of the Farm Stomp Oor 109, Prieska District, Northern Cape Province. A Basic Assessment Report (BAR) and Environmental Management Programme (EMPr) has been submitted in terms of the National Environmental Management Act, 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 activities include 25 percussion boreholes and 15 core boreholes with a 10m<sup>2</sup> disturbance around each hole, and access tracks. Final borehole locations will only be finalised after initial non-invasive studies are completed.

G & A Heritage has been appointed to provide a heritage assessment as per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as part of the BAR.

*Gaigher, S. 2018. Desktop Heritage Impact Assessment Report for the Prospecting Right Application: On the Farm Stompoor 109 near Prieska in the Northern Cape Province.*

Several significant palaeontological resources have previously been identified on the farm Stompoor which include fossiliferous sediments accumulations of a Late Cretaceous crater lake with fossils of fish, frogs, bivalve, gastropod and ostracode shells, leaf impressions, insect wings and possible bird bones. The surrounding area is also known to contain Stone Age lithics, rock engravings sites, possible Tswana Iron Age sites, Boer War sites and war graves, and historical structures.

Recommendations provided in the report include the following:



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- Once the specific borehole sites have been determined, they must be subjected to a surface investigation to determine if any sites of heritage significance will be affected;
- Due to the high palaeontological value of the area, it is suggested that a palaeontological study lead the placement of the boreholes to minimize their impact.

In an Interim Comment issued on the 25/10/2018, SAHRA requested that a desktop Palaeontological Assessment be conducted as part of the BAR and EA Application due to the presence of significant palaeontological resources within the development area.

A desktop Palaeontological was submitted on the 21/11/2018. SAHRA was in the process of reviewing the report when the approved EA was uploaded to the case on the 28/11/2018. SAHRA proceeded to appeal the granting of the EA on the grounds that the EA had been granted without a Final Comment with heritage specific conditions from SAHRA, therefore not complying with section 38(8) of the NHRA. The appeal was submitted on the 20/12/2018 to the Department of Environmental Affairs Appeals Directorate. The appeal submitted by SAHRA was upheld in a decision provided on the 30/04/2019. As a result of the decision, a revised BAR has been submitted to all Interested and Affected Parties for comment and review.

Natura Viva CC was appointed to provide palaeontological specialist input as per the Interim Comment issued on the 25/10/2018.

*Almond, J. E. 2018. Palaeontological Heritage Report: Desktop Study. Mineral prospecting on the farm Stomp Oor 109 (Portion 3), Prieska District, Northern Cape Province.*

The proposed development area is underlain at depth by Precambrian rocks of the Namaqua-Natal Province that are of no palaeontological sensitivity. Sediments that overly this formation in the southern portions of the development area include the Mbizane Formation (Dwyka Group, Karoo Supergroup), which may contain fossilised plant remains and trace fossils, and therefore are considered to be of medium sensitivity. The majority of the proposed development area is capped by superficial deposits of the Late Caenozoic Kalahari Group, which are of low palaeontological sensitivity.

Highly fossiliferous crater lake deposits have been recorded within the development area, which contain very highly significant terrestrial and freshwater fossils. These deposits have been covered by at least 40 m deep of Kalahari Group sands, and well preserved fossils have been recovered from trenches and borehole cores at depths of only 1-3 m beneath the present surface. It is concluded that invasive activities of the proposed

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prospecting will have a negative impact to fossil heritage resources.

Recommendations provided in the report include the following:

- A site visit by a professional palaeontologist be commissioned by the developer well before the commencement of the invasive phases of the prospecting programme. The resulting palaeontological heritage assessment report should make recommendations for any mitigation or monitoring measures to be following during siting, drilling and rehabilitation of the boreholes as well as for conservation of sedimentary borehole core material for future palaeontological analysis;
- The ECO responsible for the mineral prospecting project should be aware of the potential for important fossil occurrences within near-surface or buried crater lake deposits and the necessity to conserve them for possible professional mitigation. A Chance Fossil Finds Procedure for the non-invasive phases of the prospecting programme is outlined in tabular form at the end of this report;
- Recommended mitigation of chance fossil finds involves safeguarding of the fossils (preferably in situ) by the responsible ECO and reporting of all significant finds to the South African Heritage Resources Agency, SAHRA. Where appropriate, judicious sampling and recording of fossil material and associated geological data by a qualified palaeontologist, appointed by the developer, may be required. Any fossil material collected should be curated within an approved repository (museum / university fossil collection);
- These recommendations should be included within the Environmental Management Programme (EMPr) for the proposed mineral prospecting programme.

## Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. Specific conditions provided for the development include the following;
  - i) – Once the locations of the boreholes are finalised (including the placement of any associated infrastructure or activities such as roads, office areas etc), the locations must be physically assessed

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by a qualified archaeologist and palaeontologist. A report detailing the results of these assessments must be drafted by the appointed heritage specialists and submitted to SAHRA for comment prior to the commencement of any invasive activities. No invasive activities may commence without comment from SAHRA;

- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
  - The Final BAR and EMPr must be submitted to SAHRA for record purposes;
  - The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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/512960>  
(DMR - NC, Ref: NC30/5/1/1/2/12131 PR)

**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.