

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: 13213

Date: Tuesday November 27, 2018  
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## Interim Comment

### In terms of Section 38(2), 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Percy Ngidi  
Eco-compliance

### **Proposed establishment of greenhouses to cultivate cannabis related product for medicinal purposes on Portion 3 of Farm Paarde Valley 145 in De Aar, Emthanjeni Local Municipality, Northern Cape Province**

Eco Compliance has been appointed by Project Flower Pty Ltd to manage the permitting process for the establishment of proposed greenhouses and associated infrastructure on portion 3 of the Farm Paarde Valley 145, near De Aar, Northern Cape Province. The proposed development does not trigger the National Environmental Management Act, no 107 of 1998 (NEMA), therefore the application is made to SAHRA as per section 38(1) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

A Background Information Document (BID) has been submitted that states that the Heritage Impact Assessment (HIA) conducted as part of the original Environmental Authorisation (EA) Application for the Ilanga Lethemba Solar PV Project (of which the current proposed development falls within) has been submitted as part of the section 38(1) application.

*Morris, D. 2011. Archaeology Specialist Input for the Environmental Impact Assessment Phase and Environmental Management Programme for the Proposed Ilanga Lethemba Solar Energy Facility, Near De Aar, Northern Cape Province.*

Several heritage resources were identified within the development area such as Stone Age lithics, ostrich eggshell waterflasks, burial grounds, stockpost or Anglo Boer blockhouse, historical farmhouse complex, a spring site with extensive peat deposits.

Recommendations provided in the report include the following:

- No-go buffers around two sites (co-ordinates supplied); and
- Surface sampling and documentation of several “hotspots”.

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The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an assessment of palaeontological resources is completed as the proposed development footprint is located in an area of High and Moderate sensitivity as per the SAHRIS PalaeoSensitivity map. The assessment must comply with the SAHRA 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments and it must be completed by a qualified palaeontologist.

Additionally, the SAHRA APM Unit does not accept the 2011 HIA as it is unclear whether the area currently proposed for development was surveyed, nor has an assessment of the impacts of the proposed development on heritage resources been undertaken. Therefore, a new HIA must be undertaken and must comply with the 2007 SAHRA Minimum Standards: Archaeological and Palaeontological Components of Impact Assessments and section 38(3) 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/515007>