



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: 13393

Date: Wednesday February 13, 2019

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## Interim Comment

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

Attention: Razorbill Properties 12 (Pty) Limited

PO. Box 95037, Waterkloof, Pretoria, 0145 Nr 8 Lightning Shot Rd, Mooikloof, Pretoria, 0059

### **Proposed prospecting on the Remainder, Portion 6, 7 8, 10, 11 and 29 Farm Meinhardskraal 61 KS in the Capricorn District Municipality and Polokwane Local Municipality of the Limpopo Province**

Razorbill Properties 12 (Pty) Ltd is proposing to prospect for Kimberlite pipes on the Portion 6; 7; 8; 10; 11; and 29 and the remainder of the farm Meinhardskraal 61 KS in the Polokwane Local Municipality of the Limpopo Province. The extent of the application area is 462 ha, the prospecting programme consists of five phases. Invasive activities will be initiated from phase two, whereby 20 drill holes (165mm in diameter each) will be drilled with each drill site being 160m<sup>2</sup>.

They have submitted a Background Information Document (BID) and a draft Basic Assessment report (BAR) to inform the South African Heritage Resources Agency (SAHRA) of the Environmental Authorisation application, made on behalf of the applicant, Razobill Properties 12 (Pty) Ltd. The BAR process is in respect of listed activities in the EIA Regulations 2014, as amended, that require an application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (NEMA).

In terms of the National Heritage Resources Act, no 25 of 1999 (NHRA), heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are generally protected. They may not be disturbed without a permit from the relevant heritage resources authority. In contexts of development applications, the developer must ensure that no heritage resources will be impacted by the proposed development, by lodging an application to SAHRA and submitting detailed development specifications as a notification of intent to develop. If the application is made in terms of s. 38 (8) of the NHRA then it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is undertaken, as s. 38(2)a does not apply. Such a study should follow the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports and section 38(3) of the NHRA.

It is noted that a Heritage Impact Assessment and Palaeontological Impact Assessment of the proposed development area will be undertaken by a qualified archaeologist and palaeontologists, and the reports will be

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submitted to SAHRA prior to any drilling in the prospecting programme.

### Interim Comment

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit requires that a HIA and a PIA is conducted by a suitably qualified archaeologist and palaeontologist respectively, and the reports must be submitted to the case prior to the submission of the Final Bar to the competent authority.

SAHRA APM unit will process the case further once the above requested reports are submitted to the case. Furthermore, SAHRA recommends that the applicant applies for an extension of the BAR application in terms of section 19 (1)b of NEMA, Act, 1998, to allow for the assessment of heritage.

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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Nokukhanya Khumalo  
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/520248>  
(, Ref: LP30/5/1/1/2/13305PR )