



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: 14119

Date: Monday October 21, 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: Ditukus Projects (Pty) Ltd

#### **Prospecting Right including bulk sampling**

M and S Consulting have been appointed by Ditukus Projects (Pty) Ltd to conduct an Environmental Authorisation (EA) and Prospecting Right (PR) Application on the remaining extent and portion 1 of the farm Demaneng 546 near Kathu, Northern Cape Province (NC 30/5/1/1/2/11686 PR).

A Scoping Report 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 prospecting activities will include 20 boreholes with blasting, bulk sampling in the form of 10 trenches, ablution facilities, diesel tanks, generator site, offices, workshop, processing plants, roads, salvage yard, stockpile area, wash bay, waste rock dumps, water tank, weighbridge and control room over 2 073 ha.

G & A Heritage Management Properties (Pty) Ltd has been appointed to provide heritage specialist input as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA.

*Gaigher, S. 2019. Heritage Impact Assessment (HIA) Report. Demaneng: Prospecting Boreholes and Trenches.*

Several Stone Age lithics were identified within the proposed area for the prospecting activities, but no sites were identified. The report noted that the proposed development area is underlain by the Kalahari Group and does not contain fossils. A Chance Finds Procedure is recommended.

In an Interim Comment issued on the 26/08/2019, SAHRA had requested that a Palaeontological Impact Assessment (PIA) inclusive a field visit be conducted during the EIA phase of the EA process as the proposed footprint for the prospecting activities is located within an area of very high palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map.



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Since the issuing of the Interim Comment, a PIA has been submitted to SAHRA including a revised EIA.

*Almond, J. 2019. Palaeontological Heritage Report Desktop Study: Proposed mineral prospecting on the remaining extent and portion 1 of the farm Demaneng 546, Gamagara Local Municipality, Kuruman Magisterial District, Northern Cape Province.*

The proposed project area is underlain by Precambrian Manganore Formation and Wolhaarkop breccia that do not contain fossils with the possible exception of microfossil assemblages in ironstone facies. Possible stromatolites may be present within the Campbellrand Subgroup rocks and the late Caenozoic superficial deposits are sparsely fossiliferous.

As the footprint of the prospecting will be small and the overall palaeontological sensitivity of the area is generally low, it is assumed that the proposed development will have a low impact on palaeontological heritage of the area.

Recommendations provided in the report include the following:

- The ECO responsible for the mineral prospecting programme on Demaneng 546 should be aware of the potential for exposure of well-preserved stromatolites through trenching and in borehole cores;
- A Chance Fossil Finds Procedure for this development is outlined in tabular form at the end of this report. Recommended mitigation of chance fossil finds during prospecting involves safeguarding of the fossils (preferably in situ) by the responsible ECO and reporting of all significant finds to the 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 project.

## 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



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**Final EIA 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. No further specific conditions are provided for the development;
- 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 EIA 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  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/526634>  
(DMR - NC, Ref: NC 30/5/1/1/2/11686 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.