

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 14467

Date: Tuesday March 29, 2022
Page No: 1

Final Comment

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

Attention: Botshelo T and G Mining Resources (Pty) Ltd

An application to prospect for Manganese Ore, Iron Ore and Diamond (Alluvial, General and in Kimberlite) has been accepted by the Department of Mineral Resources and Energy. The applicant intends to prospect with Bulk Sampling. Heritage Impact Assessments in respect of this application have been conducted. Comment is hereby invited from the SAHRA.

Zandile Dwane has been appointed as an Environmental Assessment Practitioner (EAP) by Botshelo T and G Mining Resources (Pty) Ltd to conduct an Environmental Authorisation (EA) Application and Prospecting Right (PR) Application for proposed prospecting activities on farm Gamolilo 72 near Hotazel, Northern Cape Province (NC 30/5/1/1/2/12365PR).

A draft Scoping Report has been submitted 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, 28 of 2002 (MPRDA)(As amended). The proposed prospecting activities include 20 trenches (50 m x 25 m x 200 m deep), 200 pits (3 m x 2 m 500 m deep) temporary structures, temporary dump site, residue dam, oil storage facility, topsoil stockpiles, 3 km water pipeline and ±3 km of roads.

The FSR notes that an assessment of heritage resources may be required.

In an Interim Comment issued on the 20/11/2019, SAHRA requested that an assessment of the impacts of all planned invasive activities on heritage resources that complies with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as part of the EA process.

Since the issuing of the Interim Comment, an amended Scoping Report has been submitted. This report does not reflect the Interim Comment provided by SAHRA and it does not appear that the impact to heritage resources will be assessed during the EIA phase of the project.

In an Interim Comment issued on the 13/12/2019, SAHRA requested that an assessment of the impacts of all

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 14467

Date: Tuesday March 29, 2022
Page No: 2

planned invasive activities on heritage resources that complies with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA and section 24(4)(b)(iii) of NEMA be conducted as part of the EA process. Since the issuing of the Interim Comment, the EIAR dated September 2021, the PIA and HIA have been submitted for review (28/02/2022).

Bamford, M. 2020. Palaeontological Impact Assessment for the proposed Gamolilo Prospecting/Mining Rights Application, northwest of Kuruman, North West Province.

The proposed prospecting area is underlain by banded ironstone of the Danielskuil and Kuruman Formations that do not preserve fossils. These rocks are overlain by Quaternary aeolian sands and tertiary surface limestones that may contain fossils, however only in pan silcretes or limestone tufas which are not present in the study area. A Fossil Chance Finds Protocol is recommended to be added to the EMPr and is provided in the report.

Matenga, E. 2022. Phase 1 Heritage Impact Assessment Requested in Terms of Section 38 of the National Heritage Resources Act No 25/1999 for the Proposed Prospecting and Mining Right on the Farm Gamolilo 72 near Kuruman, Northern Cape Province.

A total of 22 heritage resources were identified within the proposed development area. These include 17 surface scatters of Stone Age lithics of medium B significance, two farmsteads with associated structures of medium B significance and one rock engraving site of high heritage significance. No heritage resources will be impacted by the proposed development.

Recommendations provided in the report include the following:

- The rock engravings must be protected with a proposed 200 m buffer zone;
- A Chance Finds Procedure is recommended to be followed.

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 EIA and EMPr:

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za

Date: Tuesday March 29, 2022
Page No: 3

CaseID: 14467

- 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. Further specific conditions are provided for the development as follows:
- A 50 m buffer around the identified rock engraving site is sufficient as the activities are prospecting only. No activities, including roads or vegetation clearance is permitted within 50 m of the rock engravings;
- 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/Ngqabutho Madida 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 regarding offences;
- 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

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 14467

Date: Tuesday March 29, 2022
Page No: 4

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/530350>
(DMR - NC, Ref: 12366PR)

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.