

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: 14734

Date: Friday February 14, 2020
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Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr G B Simelane

Farm In-Die-Kom 345 JQ (applied area) is located on the Western side and North west of the Buffelspoort Dam. It is approximately 12.16 km from Marikana and approximately 22.15 km South East of Rustenburg town. There is an operating mine on the other side of Marikana which is approximately 1.6 km from the proposed area. The agricultural land which share the boundary with the proposed project is currently used for agricultural purposes.

Singo Consulting (Pty) Ltd has been appointed by Niche-Mining to conduct an Environmental Authorisation Application for proposed prospecting activities on the farm In-Die-Kom 345 JQ near Buffelspoort, North West Province (NW 30/5/1/1/2/12709 PR).

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2014 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed prospecting right application area will cover approximately 956.53 ha and will include activities such as vegetation clearance, percussion or diamond core drilling (20 boreholes in total), site camp, equipment storage, sample storage temporary ablution facilities.

The DBAR notes that no heritage resources will be impacted by the proposed development activities however, no assessment of heritage resources has been undertaken as part of the EA application 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.

The DBAR notes that a Heritage Impact Assessment will be conducted once the drill sites have been identified.

Interim Comment

As the location of the drill sites are not determined as of yet, SAHRA requests that a Desktop HIA be conducted as part of the EA Application as to determine the impact to heritage resources at a landscape level.

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Several Boer War skirmishes took place in the area and landscape sites such as battlefields must be assessed (<https://www.angloboerwar.com/forum/13-miscellany/27071-the-rustenberg-commando>). The HIA must be conducted by a qualified archaeologist and the report must comply with the 2007 SAHRA Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments.

Additionally, as the proposed prospecting footprint is location in an area of moderate palaeontological sensitivity as per the SAHRIS PalaeoSensitivity Map, a desktop Palaeontological Impact Assessment must be undertaken by a qualified palaeontologist as part of the EA application.

The desktop PIA must be conducted by a qualified palaeontologist and the report must comply with the 2012 SAHRA Minimum Standards: Palaeontological Component of Heritage Impact Assessments. The draft BAR must be amended to include the results of the desktop PIA and the desktop HIA.

The applicant is advised to extend the EA application process in terms of section 19(1)b of the NEMA regulations in order to comply with this comment.

Further comments will be issued upon receipt of the above requested reports.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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/533256>
(, Ref:)