

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 14934

Date: Friday March 13, 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 John Leask Gates Firth

**Prospecting Right Application for alluvial diamonds and diamonds general on Farm Highlands 392 HO and Portions 4 and 6 of the Farm Roodepoort 206 HO. The proposed prospecting site is situated in Maquassi Hills local Municipality, within Dr Kenneth Kaunda District municipality in North West Province**

Terra Africa Consult CC has been appointed by Highlands Farm Trust to conduct an Environmental Authorisation Application for proposed prospecting activities on Farm Highlands 392 HO and Portions 4 and 6 of the Farm Roodepoort 206 HO, Maquassi Hills local Municipality, within Dr Kenneth Kaunda District municipality in North West Province (NW30/5/1/1/2/12618PR).

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 980 ha and will include 11 pits (2 m x 3 m x 2 m deep) and 10 trenches (10 m x 30 m 2 m deep), plant site, ablution facility, sorting facility and parking area, diesel storage, domestic waste facility, access road and topsoil stockpiles. It is noted that the location of the pits and trenches will be finalised after Phase 2 of the project.

Mr. Tobias Coetzee has been appointed to provide heritage input into the BAR process 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.

*Coetzee, T. 2020. Archaeological Desktop Study for the application of a Prospecting Right on the farm Highlands 392 HO and Portions 4 and 6 of the Farm Roodepoort 206 HO, Wolmaransstad, North West.*

The desktop study highlighted areas where heritage resources, such as historical structures, may possibly occur (see Figure 4 on page 18).

*Recommendations provided in the report include the following:*

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- It is recommended that the demarcated 'Potential Heritage Sites' areas on Figure 4 be avoided by the proposed prospecting activities due to the possible presence of surface/subsurface culturally significant material. Should this not be possible, a qualified archaeologist should be present on-site during prospecting in order to limit potential impact on heritage resources and provide the required input;
- It is advised that a qualified archaeologist be contacted whenever uncertainty regarding potential heritage remains are encountered;
- Prospecting should not take place in the vicinity of stone cairns, potential burial sites, stone-walling, building ruins or any other heritage material or structures;
- Should the prospecting outcome result in further development or construction, a full Phase 1 Archaeological Impact Assessment must be conducted on the affected area if triggered. Also, a full Phase 1 AIA must be done should the cumulative impact of the proposed prospecting exceed 0.5 ha;
- Because archaeological artefacts generally occur below surface, the possibility exists that culturally significant material may be exposed during the prospecting phase, in which case all activities must be suspended pending further archaeological investigations by a qualified archaeologist. Also, should skeletal remains be exposed, all activities must be suspended and the relevant heritage resources authority contacted (See National Heritage Resources Act, 25 of 1999 section 36 (6));
- From a heritage point of view, prospecting may proceed on the demarcated portions, subject to the abovementioned conditions and recommendations.

## Interim Comment

The SAHRA Archaeological, Palaeontological and Meteorites (APM) Unit requests that a Desktop Palaeontological Assessment be undertaken as part of the EIA phase of the EA application process as the development footprint is located within areas of moderate sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map. This desktop PIA must be conducted by a qualified palaeontologist and comply with the 2012 SAHRA Minimum Standards: Palaeontological Component of Heritage Impact Assessments.

SAHRA advises the applicant to apply for an extension of the EA process in terms of section 19(1)b of the NEMA EIA Regulations in order to address this comment.

Additionally, the DBAR appendices must be submitted so that an informed comment may be issued.

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

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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

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/534918>  
(, Ref: NW30/5/1/1/2/12618PR)