

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 15004

Date: Monday May 11, 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: Saxon Heavy Minerals (Pty) Ltd

**The proposed Prospecting Right application without Bulk Samples, combined with a Waste Licence Application for the mining of Heavy Minerals (General), Rutile (Heavy Mineral), Ilmenite (Heavy Mineral), Zircon (Heavy Mineral), Monazite (Heavy Mineral) and Leucosene (Heavy Mineral) near Springbok on the Farm Nuttabooi 199, Registration Division: Namaqualand, Northern Cape Province**

Milnex CC has been appointed by Saxon Heavy Minerals (Pty) Ltd to conduct an Environmental Authorisation Application for proposed prospecting activities on the farm Nuttabooi 199, Registration Division: Namaqualand, Northern Cape Province (NC30/5/1/1/2/12378PR).

A Basic Assessment Report (BAR) 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 4 872.98 ha and will include 68 RC drilled boreholes as part of Phase 2A and possible additional boreholes in Phase 2B and residue stockpiles.

The BAR notes that it is not foreseen that the proposed activity will impact on heritage resources, and notes that an investigation report was conducted (see page 80 of the report).

In an Interim Comment issued on the 24/03/2020, SAHRA requested that the heritage report be submitted to the SAHRIS Case application for review.

Since the issuing of the Interim Comment, a report has been submitted regarding the impact to heritage resources.

*Lavin, J. 2020. Desktop Heritage Screening Assessment: Prospecting Right without bulk samples, combined with a Waste Licence Application for Saxon Heavy Minerals (Pty) Ltd for the mining of heavy minerals (General), Rutile (Heavy Mineral), Ilmenite (Heavy Mineral), Zircon (Heavy Mineral), Monazite (Heavy Mineral) and Leucosene (Heavy Mineral) near Springbok on the Farm Nuttabooi 199, Registration Division: Namaqualand, Northern Cape Province - Bar 15*

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The report notes that the proposed project is unlikely to impact significant palaeontological heritage. Recommendations provided in the report include that a Heritage Impact Assessment should be conducted that assesses the impact to archaeological heritage.

#### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an HIA inclusive of an Archaeological Impact Assessment (AIA) be conducted as part of the EA process for the proposed development in terms of section 38(3) of the NHRA. The AIA must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports. No further assessment of the impact to palaeontological resources is required.

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 comply with this comment.

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

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/535581>  
(DMR - NC, Ref: NC30/5/1/1/2/12378PR)