

**Our Ref:**



an agency of the  
Department of Arts and Culture

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Enquiries: Natasha Higgitt  
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CaseID: 15412

Date: Tuesday September 06, 2022  
Page No: 1

## **Interim Comment**

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

Attention: Willie Oosthuizen  
Wadala Mining and Consulting Pty Ltd

#### **Opencast Mining for Tin, Zinc and Tungsten ore.**

Wadala Mining and Consulting (Pty) Ltd has been appointed by Renosterkop Mining Company (Pty) Ltd to conduct an Environmental Authorisation Application for proposed mining activities on remaining extent of Lot 1726, Lot 1288 and Lot 1279, near Kakamas, Northern Cape Province (NC 30/5/1/2/2/10172 MR).

A draft Scoping Report (DSR) 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 mining right application area will cover 540,1145 ha and will include opencast mining with associated activities and infrastructure such as blasting, sewage facilities, stormwater dam, fuel storage facility, powerlines, office area, parking bay, crushing and screening plant, access roads and a haul road, salvage yard, security gate and guard house, various stockpiles, storage facility, topsoil storage area, waste disposal site, waste rock dump, workshop and wash bay, water pipeline, water tanks, weighbridge and weighbridge control room.

The DSR notes heritage desktop reports are being conducted (see page 44 and 69 of the DSR) and will be submitted during the EIA phase of the application.

In an Interim Comment issued on the 02/10/2020, SAHRA noted the pending heritage reports and requested that the reports comply with certain requirements such as field-based assessments. Since the issuing of the Interim Comment, the Draft EIA, Heritage Impact Assessment and Palaeontological Impact Assessment have been submitted for review (05/08/2022).

*Bamford, M. 2022. Palaeontological Impact Assessment for the Mining Right application on several lots on Farm Kakamas South Settlements, northwest of Kakamas, Northern Cape Province.*

The proposed development area is underlain by non-fossiliferous metamorphic rocks of the Riemvasmaak Gneiss that are overlain by Quaternary fluvial gravels that are moderately sensitive, however, no palaeo-channels are evident that would have trapped fossils. A Fossil Chance Finds Procedure is

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recommended to be followed.

*Matenga, E. 2022. Heritage Impact Assessment & Palaeontological Desk Assessment for a Mining Right on Lot 1288, Lot 1279 and Remainder Lot 1726 (Portion of Lot 1177) Kakamas South Settlement (Renosterkop) near Kakamas, Kai !Garib Municipality Northern Cape.*

A total of 27 heritage resources were identified as part of the field-assessment. These include Stone Age lithics scatters of low heritage significance, a cement floor with associated historical artefacts of low heritage significance, stone revetment walls and enclosures of low heritage significance associated with earlier mining activities, a trigonometrical beacon of low heritage significance, a stone revetment wall of good workmanship of medium B heritage significance, a shelter with associated artefacts of Medium A heritage significance and a stone packed burial of High heritage significance. Renosterkop Hill (Nawaptana) is noted to be a significant feature in the landscape, which was visited by hunter-gatherer communities based on the excavations conducted in 1991, while also attracting historical travellers, the Namakwas Khoi communities, Tswana groups and Afrikaner communities who settled in the area. The cultural landscape of the hill is rated to be of GRADE 3A Local High heritage significance. It is noted in the EIA that the entire hill will be mined.

Recommendations provided in the report include the following:

- The cairn burial must be protected with a 100 m servitude in which physical works are not allowed without a permit from SAHRA or the provincial heritage resources authority;
- The rock shelter on the crest of the hill must be protected;
- Mining by opencast methods on the southern, western and northern slopes of Renosterkop will impact negatively on the structural integrity of Renosterkop as a cultural landscape. The impact will be largely visual affecting the tourist value of the hill. The impact may be severe during the life of the mine. Backfilling will mitigate the visual impact although full restoration might not be possible;
- A Chance Finds Procedure is appended to this Report and will be used by the Environmental Control Officer as a manual to curate chance finds;
- A Conservation Management Plan (CMP) must be prepared for the protection and sustainable management of heritage resources. A CMP will contribute significantly to lowering the risk of uncertainty inherently present in ad hoc decision making and reactive interventions.

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The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the HIA be revised to include the following:

- A map showing the location of all identified heritage sites (the current map does not show all the sites). The map must include the location of the excavations conducted in 1991;
- A tracklog of the conducted survey;
- The impact to the shelter must be reassessed taking into account the blasting activities of the proposed mine;
- A targeted public consultation regarding the heritage significance of Renosterkop Hill. This consultation must include the local community, tourist businesses who rely on the attraction of the hill, representatives of any remaining Namakwa Khoi groups, and researchers such as Prof David Morris regarding the impact of the development on the hill as per section 38(3)e of the NHRA; and
- A revised evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefit to be derived from the development, once the consultation requested above has been completed.

Further comments will be issued upon receipt of the above requested report and revised EIA that includes the results of the revised HIA. The applicant is advised to extend the EA process in terms of section 23(1)b of the NEMA EIA Regulations in order to comply with this comment.

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

**Mining Right for Tin, Zinc and Tungsten ore by Renosterkop Mining Company  
(Pty) Ltd with Opencast Mining. NC 10172 MR**

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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: <https://sahris.sahra.org.za/node/539188>