

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  
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CaseID: 15458

Date: Wednesday March 24, 2021  
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## Final Comment

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

Attention: Sishen Iron Ore Company (Pty) Ltd

Private Bag X 506  
KATHU  
8446

### **Kolomela mine is proposing the development of a new airport on the farm Kalkfontein 474 south of Postmasburg in the Tsantsabane Local Municipality, Northern Cape.**

EXM Advisory Services have been appointed by Sishen Iron Ore Company (Pty) Ltd to conduct an Environmental Authorisation Application for a proposed airport near Postmasburg, Northern Cape (NC/EIA/06/ZFM/TSA/POS1/2020).

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 EIA Regulations. The proposed development will include a new runway, helipad, fuel farm, water storage tanks, access road, septic tank system, terminal building and supporting facilities, waste management area and powerlines (11kV). The proposed development will cover approximately 80 ha.

The DSR notes that a Heritage Impact Assessment (HIA) and Palaeontological Impact Assessment (PIA) are being conducted (see page 24 of the DSR) and will be submitted during the EIA phase of the application.

In an Interim Comment issued on the 18/09/2020, SAHRA noted the pending assessment of heritage resources and requested that the reports comply with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports and 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

Since the issuing of the Interim Comment, the Draft EIA, HIA and PIA have been submitted to the SAHRIS application (23/02/2021).

Banzai Environmental (Pty) Ltd and PGS Heritage (Pty) Ltd were appointed to provide specialist heritage input as part of the EA process as per section 24(4)b(iii) of NEMA and in terms of section 38(3) and 38(8) of the

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NHRA.

*Butler, E. 2020. Phase 1 PIA completed in support of EIA for the development of the Kolomela Airfield.*

The proposed development footprint is underlain by Quaternary aged sediments of the Kalahari Group and Griqualand West Basin rocks that includes the Campbell and Griquastad Group sediments. Trace fossils, bivalves, gastropod shells and diatoms are known to be present within the Kalahari Group rocks, while stromatolites are known to occur in the Griqualand West Basin rocks. No fossiliferous outcrops were identified during the field survey nor any fossils found in the pans. The proposed development will not lead to detrimental impacts to palaeontological resources. A Chance Fossils Finds Protocol is recommended to be implemented and is provided in the report.

*De Bruyn, C. 2020. Phase 1 HIA in support of the EIA for the Kolomela Airfield.*

A total of 11 heritage resources were identified within the proposed development footprint. These include 10 surface scatters of Stone Age lithics of medium significance and one possible grave site of high heritage significance. It must be noted that the grave site is located outside of the project footprint.

Recommendations provided in the report include the following:

- The site should be demarcated with a 30-meter buffer and that the graves should be avoided and left in situ;
- A Grave Management Plan should be developed for the graves which also need to be approved by SAHRA, if graves are to be relocated;
- If the site is going to be impacted and the graves need to be removed, a grave relocation process for site PMB-11 is recommended as a mitigation and management measure;
- Should it not be possible to avoid damage to site PMB-06, a Phase 2 archaeological mitigation process must be implemented. This will include surface collections, test excavations and analysis of recovered material. A permit issued under section 35 of the NHRA will be required to conduct such work. This applies to all identified Stone Age heritage sites within the development area i.e. PMB-01 – PMB-10;
- A Chance Finds Procedure is recommended to be implemented and is provided in the report.

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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:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows;
- Should it not be possible to avoid impacts to the identified Stone Age lithics sites, a permit in terms of section 35 of the NHRA and Chapter II and IV of the 2000 NHRA Regulations must be applied for from SAHRA. No mitigation work may commence without a permit issued in this regard;
- 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/Mimi Seetelo 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;
- 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 report 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.

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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: <https://sahris.sahra.org.za/node/539662>

**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.