

Our Ref:



an agency of the
Department of Arts and Culture

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CaseID: 15819

Date: Friday March 26, 2021
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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: Lushika Services

Prospecting right application- Traditional drilling and prospecting methods will be implemented

Lushika Services has been appointed by Daqlas Minerals and Resources (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on various properties within the Gordonia District, Northern Cape Province (NC 30/5/1/1/2/12550 PR).

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed prospecting will include 300 borehole locations with a footprint of approximately 300m² each with access roads (2.5 km and 3 m wide), covering an application area of 31 202 ha.

The DBAR notes risks to heritage resources and provides mitigation measures, but no assessment of the impact to heritage resources has been submitted as part of the DBAR as required by section 24(4)b(iii) of NEMA and section 38(8) and 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Interim Comment

SAHRA requests that an assessment of heritage resources inclusive of a field survey be conducted as part of the DBAR and EA process. The Heritage Impact Assessment (HIA) must comply with section 38(3) of the NHRA. The assessment of archaeological resources must be completed by a qualified archaeologist comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports.

A field-based Palaeontological Impact Assessment (PIA) must be completed for the proposed development as the footprint is located within an area of moderate and very high palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map. The assessment of palaeontological resources must be completed by a qualified palaeontologist and must comply with the 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessment Reports.

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Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

The applicant is advised to extend the EA application process in terms of section 19(1)b of the NEMA EIA regulations to comply with this comment and allow for the relevant public participation process for the HIA, and to provide SAHRA an opportunity to provide comments in terms of section 38(8) of the NHRA, that can be included in the Final BAR for decision making to the competent authority.

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

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

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Direct URL to case: <https://sahris.sahra.org.za/node/546487>
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