

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](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15850

Date: Tuesday November 22, 2022  
Page No: 1

## Final Comment

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

Attention: Mr Wilmot Prusent  
Transalt (Pty) Ltd  
7 Clarke Street  
South Alrode  
Alberton  
1451

### **Upgrade and consolidation of more than one existing salt mining operations under one Mining Right. Portions 10, 13, 18 and 20 of Farm Groot Witpan 327 Gordonia RD Northern Cape**

Site Plan Consulting has been appointed by Industrial Salt (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Upgrade and consolidation of more than one existing salt mining operations under one Mining Right. Portions 10, 13, 18 and 20 of Farm Groot Witpan 327 Gordonia RD Northern Cape (NC 30/5/1/1/2/1/ 219MR).

A Final Scoping Report (FSR) 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 upgrades will include clearing of logistical area outside of pan edge, establishment of logistical facility including residences, office, generator facility, establishment of plant and stock area on pan, and development of dam walls.

Two heritage reports were submitted with the application, however it is noted that these report assessed an application to the south-east of the current application. SAHRIS Case ID 13104 refers (<https://sahris.sahra.org.za/cases/gemsbok-horn-prospect>). The FSR notes that it is anticipated that a Heritage Impact Assessment will be required.

In an Interim Comment issued on the 15/12/2020, SAHRA requested that the pending HIA must comply with section 38(3) of the NHRA. Since the issuing of the Interim Comment, Heritage specialist reports and the EIA has been submitted (27/10/2022).

*Pether, J. 2022. Basic Palaeontological Assessment Letter of Recommendation for Exemption from further Palaeontological Studies Consolidation of Salt Pan Mining Rights on Groot Witpan 327 Industrial Salt (Pty)*

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](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15850

Date: Tuesday November 22, 2022  
Page No: 2

*Ltd.*

The proposed development area is underlain by the Mbizane Formation of the Karoo Supergroup and fossils that may be present include trace fossils, plant material and a low diversity of invertebrates and fish remains. Some excavations in pans have also uncovered fossil bones and Stone Age artefacts. The pans are rimmed by sand-covered calcrete pedocretes of the Mokalanen Formation that may contain fossil root casts and other trace fossils. A Chance Finds Procedure is recommended. The palaeontologist proposes that no further assessment of the impact to heritage resources need be undertaken.

*Kaplan, J. 2022. Recommended Exemption from Further Archaeological Studies, Consolidation of Salt Mining Rights under One Mining Right: Portions 10, 13 18 & 20 of the Farm Groot Witpan No. 327, Gordonia RD, Dawid Kruiper Local Municipality, Northern Cape Province.*

The heritage specialist proposes that no further assessment of the impact to heritage resources need be undertaken as the area is highly disturbed and that only heritage resources such as low density scatters of Stone Age lithics of low heritage significance have been previously been identified in the surrounding areas and pans.

## Final Comment

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 EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 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)

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](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15850

Date: Tuesday November 22, 2022  
Page No: 3

Unit (Thingahangwi Tshivhase/ Ngqabutho Madida 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 regarding offences;
- 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 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.

Yours faithfully

---

Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

---

Phillip Hine  
Manager: Archaeology, Palaeontology and Meteorites Unit

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](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 15850

Date: Tuesday November 22, 2022  
Page No: 4

South African Heritage Resources Agency

---

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/546884>  
(DMR - NC, Ref: NC 30/5/1/1/2/1/ 219MR)

**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.