



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: Nokukhanya Khumalo
Tel: 021 462 4502
Email: nkhumalo@sahra.org.za
CaseID: 15865

Date: Friday January 08, 2021
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Interim Comment

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

Attention: Mr Lesego Mathebula

Prospecting Right Application has been submitted for the prospecting of Coal and Pseudocoal on the Remaining Extent, Remaining Extent of Portion 1, Portions 2, 3 and 6 of Farm Trekpad 455 MS, situated in the Local Municipality of Makhado, under Soutpansberg Magisterial District, Limpopo Province, (DMRE Ref: LP 30/5/1/1/2/ 13823 PR).Area of Application is Approximately 1 130.09 Ha.

Raycom Resources (Pty) Ltd are proposing to prospect for coal and pseudocoal resources on all Portions of the farm Trekpad 445 MS, Makhado Local Municipality, Limpopo Province. As part of their prospecting work programme, they are proposing to drill 10 boreholes. Each drill pad for the borehole will be 0.6ha in extent.

Singo Consulting (Pty) Ltd have been appointed to undertake an environmental assessment as part of the Scoping and Environmental Impact Reporting process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations. As well as an Environmental Management Plan as per the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

A Basic Assessment report was submitted to the South African Heritage Resources Agency (SAHRA) for commenting in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). The report states that they will actively identify any heritage resources during the prospecting activities. However, they do not state the qualifications of the person who will be undertaking the identification process. The report further states that already noted the presence of graves on Portion 3 of the farm Trekpad 445 MS.

Interim Comment

As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include an archaeological component, palaeontological component and any other applicable heritage components. The

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HIA must be conducted as part of the EA Application in terms of NEMA and the NEMA EIA Regulations.

The archaeological component of the HIA should follow the SAHRA 2007 Minimum Standards: Archaeological Component of Impact Assessment Report. The quickest process to follow for the archaeological component would be to contract a qualified archaeologist (see www.asapa.co.za or www.aphp.org.za). The Minimum Standards refers to a Letter of Recommendation for Exemption from further studies, that may be submitted should the archaeologist deem it appropriate.

The proposed development area is located within an area of very high sensitivity in terms of palaeontological resources as per the SAHRIS PalaeoSensitivity. The dBAR notes that the development area is underlain by the highly fossiliferous Karoo Supergroup formations, as such, a field-based Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

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 BAR 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 requested.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokukhanya Khumalo

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Heritage Officer
South African Heritage Resources Agency

Phillip Hine

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

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/547579>

(, Ref:)