

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
Email: nhiggitt@sahra.org.za
CaseID: 15975

Date: Thursday March 11, 2021
Page No: 1

Final Comment

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

Attention: Prescali Environmental Consultants (pty) Ltd

P.O. Box 2544
Montana Park
0159

Salene Manganese (Pty) Ltd prospecting Right application. For the following Minerals: Aluminium, Silver, Arsenic, Barium, Bismuth, Cerium, Cobalt, Copper, Potassium, Lanthanum, Nickel, Phosphorus, Lead, Rubidium, Sulphur, Scandium, Silicon, Strontium, Titanium, Vanadium, Zink, Rare Earth Elements, Lithium Located on: Jenkins 562, Gappenpin Reserve 670, Msahwening 557 (vanadium excluded), Helpebietjie 738, Kadgame 558, Bishop 671, Morokwa 672, Lomoteng 669, Magoloring 668, Vlakfontein 433, Doornfontein 446 (vanadium excluded), Farm 447, Farm 476, Lohathla 673, Goucester 674, Driehoekspan 435, Farm 434, Kapstewel 436, Farm 445, Farm 450, Beesthoek 448, Olkynfontein 475, Mokaneing 560, Farm 431, Farm 478, Farm 477, Farm 485, Farm 486, Ploegfontein 487, Leeuwfontein 488, Strydfontein 614, Klipbank 489, Kapstewel 541, portion of Pensfontein 449, Portion 1 and the remainder of Macarthy 559 within the administrative district of Postmasburg, Northern Cape Province DMRE Reference Number: NC30/5/1/1/2/12630 PR

Prescali Environmental Consultants (Pty) Ltd have been appointed by Salene Manganese (Pty) Ltd to conduct an Environmental Authorisation Application for proposed prospecting activities on various properties near Postmasburg, Northern Cape Province (NC 30/5/1/1/2/1/ 12630PR).

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 right application area will cover approximately 115 333.338 ha and will include 25 borehole sites with 10 boreholes each located in existing dumps, tailings and disturbed areas.

In an Interim Comment issued on the 11/02/2021, SAHRA requested that an assessment of the impact to heritage resources be conducted as per section 24(4)b(iii) of the NEMA and section 38(3) and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). The Interim Comment made reference to the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment



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
Email: nhiggitt@sahra.org.za
CaseID: 15975

Date: Thursday March 11, 2021
Page No: 2

Reports which notes that a Letter of Exemption for Further Studies to be completed by a qualified archaeologist must be submitted should the area be highly disturbed. Additionally, as the location of the prospecting had not been mapped, it was unclear regarding the palaeontological sensitivity of the prospecting area and the applicant was advised of the way forward.

Since the issuing of the Interim Comment, a response by the applicant has been submitted to the SAHRIS application. The applicant is of the opinion that an assessment of the impact to heritage resources is not required as the prospecting is to occur in highly disturbed areas and assumes that previous heritage impact assessments were conducted as part of the previous mining activities.

In a second Interim Comment issued on the 02/03/2021, SAHRA noted that the development footprint was located in an area of very high palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map and requested that a field-based Palaeontological Impact Assessment must be conducted as part of the EA process. Either a desktop Heritage Impact Assessment or a Letter of Exemption from Further Studies may be provided for the archaeological component taking note of previous impact assessments conducted within the prospecting footprint.

In a response to the second Interim Comment, the applicant noted that no drilling would take place and the samples would be collected using shovels. The DBAR noted that should drilling or bulk sample be found feasible, an EA amendment application process would be conducted.

Final Comment

The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The above statement is on the condition that the proposed activities will not constitute more than shovel sample tests of residue tailings and stockpiles only;
- 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

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
Email: nhiggitt@sahra.org.za

Date: Thursday March 11, 2021
Page No: 3

CaseID: 15975

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 BAR must be submitted to the SAHRIS application for record purposes;
 - The decision regarding the EA application and PR application must be submitted to the SAHRIS application for record purposes;
 - Should drilling or other bulk sampling activities be found feasible, assessments of the impacts to heritage resources will be required as part of the EA Amendment application process.

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

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
Email: nhiggitt@sahra.org.za
CaseID: 15975

Date: Thursday March 11, 2021
Page No: 4

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/553215>
(DMR - NC, Ref: NC 30/5/1/1/2/1/ 12630PR)

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.