

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Natasha Higgitt
Tel: 021 462 4502
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CaseID: 15975

Date: Tuesday March 02, 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: 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

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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 conducted as part of the previous mining activities.

Interim Comment

The SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports provides for a Letter of Exemption for Further Studies to be provided as part of a development application, where the development area is highly disturbed. Additionally, it is now clear that the prospecting activities will be located in areas of very high palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map.

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit reiterates the need for an assessment of the impact to heritage resources. Either a desktop Heritage Impact Assessment or a Letter of Exemption for Further Studies may be provided for the archaeological component taking note of previous impact assessments conducted within the prospecting footprint. However, as the boreholes will be drilled into highly palaeontological sensitive strata, a field-based Palaeontological Impact Assessment must be conducted as part of the EA process. The reports must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists).

Further comments will be issued upon receipt of the above reports.

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

Yours faithfully

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Natasha Higgitt
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: <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.