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

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CaseID: 16102

Date: Tuesday February 15, 2022

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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: Electri City Mining (Pty) Ltd

The prospecting phase will only be: Phase 1 – Geological desktop studies and surveys, Phase 2 – Test pits and Phase 3 – Bulk Sampling.

DERA Environmental Consultants (Pty) Ltd has been appointed by Electri City Mining (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on the remaining extent of the farm Waaihoek 392, near Griekwastad, Northern Cape Province (NC 30/5/1/1/2/12454 PR).

A draft Scoping Report and 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 1 011.5145 ha and will include an unknown number of test pits (2 m x 2 m x 5 m deep) with areas around each pit to be cleared of topsoil and grass (2 m x 2 m x 3.5 m), and an unknown number of trenches (10 x 6 x 5 m deep). Associated infrastructure will include a washing plant and stockpiles.

A desktop heritage study is recommended to be conducted (see page 18 of the DSR). There is also a mention of a graveyard that will require preservation and management. However, it is also noted on page 39 of the DSR that there will be no heritage specialist studies conducted.

In an Interim Comment issued on the 12/03/2021, SAHRA requested that a desktop Heritage Impact Assessment inclusive of a desktop PIA be conducted as part of the EA application. Further comments would be issued upon receipt of the above requested reports and the draft EIA documents with associated appendices. Since the issuing of the Interim Comment, the HIA has been submitted (25/01/2022) and the DEIA with appendices (08/02/2022).

Rossouw, L. 2021. Phase 1 Heritage Impact Assessment proposed prospecting right over the Remaining Extent of Farm Waaihoek 392 near Douglas, Hay District, Northern Cape Province.

A small cemetery was identified within the proposed development area. A Chance Fossil Finds Procedure is recommended to be implemented.

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Interim Comment

The HIA must be revised to include a significance and impact assessment as per section 38(3)b and c of the NHRA, with appropriate mitigation measures to be provided as per section 38(3)g of the NHRA. Additionally, the cemetery must be mapped, and track-logs of the completed field survey must be included in the revised HIA.

Further comments will be issued upon receipt of a revised HIA. The applicant is advised to extend the EA process in terms of section 23(1)b of the NEMA EIA regulations in order to comply with this comment.

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:

Application for Prospecting Right NC30/5/1/1/2/12454PR

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Direct URL to case: https://sahris.sahra.org.za/node/557812

(DMR - NC, Ref: NC30/5/1/1/2/12454PR)