

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: 16177

Date: Thursday May 26, 2022  
Page No: 1

## Interim Comment

### In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Willie Oosthuizen  
Wadala Mining and Consulting Pty Ltd

**DJ de Smidt (“The applicant”) has applied for a Mining Right on Remaining Extent of Portion 1 (Paals Werf) of the Farm Saxendrift 20 situated in the Magisterial District of Hopetown, Northern Cape Province to mine for Diamonds (alluvial); Diamonds (General). The farm Saxendrift 20 is situated in the Northern Cape about 80 km south west of Douglas along the R357 tar road to Prieska. The farm borders on the Orange River to the South West. The property is accessible via good roads from different directions.**

Wadala Mining and Consulting (Pty) Ltd has been appointed by David John de Smidt to conduct an Environmental Authorisation (EA) Application for a proposed Mining Right application on the remaining extent of portion 1 (Paals Werf) of the farm Saxendrift 20, near Douglas, Northern Cape Province (NC 30/5/1/2/2/10175 MR).

A draft Scoping Report 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 mining right application area will cover 1 323,7453 ha and will include activities and infrastructure such as open cast alluvial diamond mining, water distribution pipeline, storm water control berms, possible storage dam and tanks, possible excavation within the 1:100 year floodline, access and haul roads, diesel storage, the clearance of ± 436 ha, residue deposits, office complex, workshop, storage facilities, diesel depot, ablution facilities, topsoil stockpiles, overburden stockpiles, water tanks and waste disposal site.

The DSR notes that a Heritage specialist study will be conducted (pg 99 of the DSR). In an Interim Comment issued on the 26/03/2021, SAHRA requested that the HIA comply with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and that a field-based PIA be conducted as part of the HIA. Since the issuing of the Interim Comment, the DEIA, HIA and PIA have been submitted for review (25/04/2022).

Prof Marion Bamford and Archaeological and Heritage Services Africa (Pty) Ltd were appointed to provide heritage specialist input as part of the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

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: 16177

Date: Thursday May 26, 2022  
Page No: 2

*Bamford, M. 2022. Palaeontological Impact Assessment for the proposed Mining Right Application on the remaining extent of portion 1 (Paals Werf) of the farm Saxendrift 20, near Prieska, Northern Cape Province.*

The proposed development area is underlain by potentially fossiliferous Dwyka Group rocks, Tertiary calcretes and Quaternary alluvium. Fossils that might be present in the development area include silicified wood, invertebrate remains and fossilised flora. A Fossil Chance Finds Procedure is recommended to be implemented as part of the EMPr.

*Matenga, E. 2022. Heritage Impact Assessment (including Palaeontological Desk Assessment) for a Mining Right Application on the Remaining Extent of Portion 1 (Paals Werf) of the farm Saxendrift 20, near Prieska, Northern Cape.*

A total of 18 heritage sites were identified within the proposed development footprint. These include one isolated Early Stone Age handaxe, surface scatters of Middle Stone Age and Later Stone Age lithics of low heritage significance, a historical trigonometrical beacon and a stone walled feature, both of low heritage significance. No mitigation actions were recommended for the identified heritage sites. A Chance Finds Procedure is recommended.

## Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) unit request that the PIA be revised to include a field work component as requested in the Interim Comment. Additionally, the survey conducted during the HIA as shown in figures on page 46 and 47 of the HIA show that limited field walking was conducted and that the survey was conducted on roads. Thus the field work component of the HIA is insufficient. SAHRA requests that a more comprehensive survey be undertaken, taking into account the layout of the development as shown on page 6 of the DEIA.

SAHRA advises the applicant to extend the EA process in terms of section 23(1)b of the NEMA EIA regulations in order to comply with this comment. A revised DEIA should be submitted that includes the results of the revised PIA and HIA. Further comments will be issued upon receipt of the revised reports.

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

Yours faithfully

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: 16177

Date: Thursday May 26, 2022

Page No: 3

---

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://sahr.is.sahra.org.za/node/561413>