

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
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CaseID: 16195

Date: Friday March 26, 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: Legacy Box Holdings (Pty) Ltd

Draft Basic Assessment and Environmental Management Programme (BAR/EMPr) Report for the proposed prospecting of Manganese Ore on Portion 1 of Farm Lizbeth 325 in Joe Morolong Local Municipality, Northern Cape Province.

Ndi Geological Consulting Services (Pty) Ltd have been appointed by Legacy Box Holdings (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on Portion 1 of Farm Lizbeth 325 in Joe Morolong Local Municipality, Northern Cape Province (NC30/5/1/1/2/12658PR).

A draft Basic Assessment 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 209.859489 ha and will include 13 during phase 2 and a further four boreholes during phase 3.

The DBAR notes that a Heritage Impact Assessment must be undertaken where infrastructure and drilling sites will be located, prior to the commencement of the prospecting activities (page 89).

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a Heritage Impact Assessment be conducted as part of the EA application that complies with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA. The assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see www.asapa.co.za or www.aphp.org.za for a list of qualified archaeologists).

The proposed development is located within an area of moderate Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map, and therefore a desktop Palaeontological Impact Assessment (PIA) must be

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required to 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 EA 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 above requested reports.

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

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/561850>
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