

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: 16233

Date: Friday April 16, 2021
Page No: 1

Interim Comment

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

Attention: Mr Trust Mlilo

Sativa Travel and Environmental Consultants
Head Office/Gauteng Office 135 Pitzer Road Glen Austin Midrand 1685

Prospecting Right Application on the farm: Berrange, 35/31, 35/30, Thackery, 35/33, Pringle, 35/53, 35/51, 35/40, 35/52, 35/37, 35/32, 35, 49, 35/39, Glynn 35/34, Dickerson 35/6, 35/4, 35/59, 35/50, Cowan 35/7, 35/3, 35/36, 35/38, Rush 35/8, 35/35, Campbell 35/12, 35/58, 35, 57, Cummings 35/9, 35/41, Prairie Glen 35/10, Cullinan 35/42, Sonning 35/60, Millar 35/11, Welgevonden 35/62, 35/44, Gillanders 35/18, Pearce 35/17, 35/43, Mons 35/15, Hugh Legg 35/64, Davidson 45/16, Hugh Legg 35/64, 35/45, Van Der Hoff 35/21, Bryant 35/22, Norris 35/23, Tom Brown 35/27, Chapman 35/26, 35/46, Jones 35/24, De Klerk 35/25, 35/67, VAN Der Venter 35/29, 35/66 in Magisterial District in the John Taolo Gaetsewe District Municipality in the Northern Cape Province.

Joan Consulting (Pty) Ltd has been appointed by Pan African Minerals Development Company (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on several farm portions in the John Taolo Gaetsewe District Municipality in the Northern Cape Province (NC30/5/1/1/2/12531 PR).

A Basic Assessment Report (BAR) dated November 2020 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 151 237 ha and will include 20 borehole sites (100m² each between 50 and 150m deep) with a site office and ablutions (2000m²), water sumps per borehole, workshop and storage yard.

Integrated Specialist Services (Pty) Ltd have been appointed to provide heritage specialist input into the EA process 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).

Mlilo, T. 2020. Phase 1 Archaeological and Heritage Impact Assessment Report for Prospecting Right Application on several farms in the Kuruman Magisterial District, Northern Cape Province.

The report notes that structures were identified, but did not state the age of these structures. One burial

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ground of high heritage significance was identified containing six (6) graves of unknown age.

The table on page 56 of the report refers to an LIA (Late Iron Age) site which is not described in the report.

Recommendations contained within the report include the following:

- The proposed prospecting right application may be allowed to proceed subject to monitoring by a professional archaeologist during prospecting
- Known burial sites must be marked and protected during prospecting
- There is a possibility of encountering unknown burial sites, it is thus advised to seek information about burial sites from farmers and farm workers.
- It is also advised that the Archaeology, Palaeontology and SAHRA Meteorites Unit is alerted when site work begins.
- Strict and clear reporting procedures for chance findings must be followed by Pan African Mineral Development Company (Pty) Ltd and its contractors throughout the whole period of prospecting.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot accept the submitted HIA as various information requirements are not present or ill-defined.

Section 38(3)a of the NHRA requires that the identified heritage resources be mapped in the area affected. This must include the tracklogs of the survey completed as per the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessments.

Additionally, the age of the structures or significance assessment of these structures is absent, and the LIA site referred to in the table on page 56 is not described.

Therefore, the SAHRA APM Unit requests that a revised HIA be conducted and submitted for comments as part of the EA process. Additionally, as the prospecting rights application area is located in an area of moderate sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map, a desktop Palaeontological Impact Assessment (PIA) must be 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.

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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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/564669>