

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: 16240

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 farms: farm 1 (Compton 169, Crofton 170 and Mooilaagte 759), farm 2 (Ormskirk 180), farm 3 (Toxteth 173) 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 the farms farm 1 (Compton 169, Crofton 170 and Mooilaagte 759), farm 2 (Ormskirk 180), farm 3 (Toxteth 173), in the Kuruman Magisterial District near Kuruman in the Northern Cape Province (NC30/5/1/1/2/12536 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 15 560 ha and will include 10 borehole sites (100m<sup>2</sup> each between 50 and 150m deep) with a site office and ablutions (2000m<sup>2</sup>), water sumps per borehole, workshop and storage yard. It is noted that the layout of the proposed development provided in the BAR (page 4) differs to that provided on page 19 of the HIA.

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 the farms Farm 1 (Compton 169, Crofton 170, Mooilaagte 759), Farm 2 (Ormskirk 180), Farm 3 (Toxteth 173), Kuruman Magisterial District in the John Taolo Gaetsewe District Municipality, Northern Cape Province.*

The report notes that structures were identified, however were deemed to be younger than 60 years. In the table on page 41/42, it is noted that one burial ground was recorded however no details are provided in the report. The bale on page 47 of the report refers to a LIA (Late Iron Age) site, however no other details are

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provided 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, no details on the structures are provided.

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 and very high sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map, a field-based 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.

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.

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

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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

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Phillip Hine  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/564683>