

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  
P.O. Box 4637 | Cape Town | 8001  
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CaseID: 16339

Date: Friday December 03, 2021  
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## Final Comment

**In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: CJ Mulke  
Willet Boerdery Pty Ltd

**Willet Boerdery (Pty) Ltd has appointed Environmental Impact Management Services (Pty) Ltd (EIMS) as the Environmental Assessment Practitioner (EAP) to assist with undertaking the required application processes (including the statutory public participation), and to compile and submit the required documentation in support of application for: • Environmental Authorisation (EA) in accordance with the National Environmental Management Act (NEMA)- Listed activity: o GNR 984: Activity 15: the clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- (i) The undertaking of a linear activity; or (ii) Maintenance purposed undertaken in accordance with a maintenance management plan**

Environmental Impact Management Services (Pty) Ltd has been appointed by Willet Boerdery (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed expansion of farming activities in the form of additional pivots on the remaining extent of the farm Olie Rivier near Douglas, Northern Cape Province.

A Draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the clearance of 70 ha of indigenous vegetation.

Banzai Environmental (Pty) Ltd and PGS Heritage (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).

*Butler, E. 2020. Palaeontological Desktop Assessment for the Proposed Pivot Irrigation Expansion on Olie Rivier near Douglas, Northern Cape.*

The proposed development area is underlain by Late Caenozoic superficial sediments which are generally of low sensitivity but locally are of high sensitivity. It is considered that the proposed development will not lead to detrimental impacts to palaeontological resources of the area. A Chance Finds Protocol is recommended and is provided in the report.

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*Fourie, W. 2020. Heritage Impact Assessment: The Proposed New Cultivation (Pivot) areas on the remainder of the farm Olie Rivier, Douglas, Sol Plaatje Local Municipality, Frances Baard District Municipality, Northern Cape Province.*

No heritage resources were identified within the proposed development area. A Chance Finds Procedure is recommended and provided in the report.

In an Interim Comment issued on the 17/05/2021, SAHRA requested that the draft EIA with associated appendices be submitted before further comments could be issued. Since the issuing of the Interim Comment, the draft EIA with appendices has been submitted to the application (11/11/2021).

The draft EIA has included the results and recommendations of the heritage specialists.

## Final Comment

The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EIA and EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - i) If heritage resources are uncovered during the course of the development, a professional

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archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

- The Final EIA and EMPr must be submitted to the SAHRIS application for record purposes;
- The decision regarding the EA application must be submitted to the SAHRIS application for record purposes.

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://sahrissahra.org.za/node/569639>

Terms & Conditions:

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1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.