

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 16375

Date: Thursday May 27, 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: Trentra (Pty) Ltd

**Trentra (Pty) Ltd has applied for Prospecting Right for manganese in respect of the remaining extent of farm Adams NO.328: within the administrative district of Kuruman, Joe Morolong Local Municipality.**

Eco Elementum (Pty) Ltd has been appointed by Trentra (Pty) Ltd to conduct an Environmental Authorisation Application for proposed prospecting activities on the remaining extent of farm Adams NO.328: within the administrative district of Kuruman, Joe Morolong Local Municipality (NC 30/5/1/1/2/12586 PR).

A draft Basic Assessment Report (BAR) 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 activities will cover 1 651 ha and include 20 boreholes (footprint of between 250m<sup>2</sup> and 640m<sup>2</sup> each) with an average depth of 100 m – 150 m, an unknown number of trenches with a maximum depth of 2 m, a 5 km long 3 m wide access road, potential water boreholes, ablution facilities, and temporary camp site.

Mr Coetzee has been appointed to provide heritage input into the EA process as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA.

*Coetzee, T. 2020. Archaeological Desktop Study for the application of a Prospecting Right on the Remaining Extent of the Farm Adams 328, Kuruman, Northern Cape.*

The desktop study noted that the development footprint is likely to include burial sites, Stone Age material, historical buildings and Iron Age settlements near riverbanks. Sensitive areas provided in Figure 4 should be excluded when selecting prospecting locations.

Recommendations provided in the report include the following:

- It is recommended that the areas demarcated as 'Sensitive Areas' on Figure 4 be excluded from potential prospecting sites due to the possible presence of surface/subsurface culturally significant material;

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- It is advised that a qualified archaeologist be contacted whenever uncertainty regarding potential heritage remains are encountered;
- Should the prospecting outcome result in further development or construction, a full Phase 1 Archaeological Impact Assessment must be conducted on the affected area if triggered;
- A Chance Finds Procedure is recommended.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requested that a field-based HIA be undertaken of the proposed prospecting area. The HIA must comply with section 38(3) of the NHRA and be conducted as part of the EA application for the prospecting activities. The archaeological component of the HIA must comply with the 2007 SAHRA Minimum Standards: Archaeological and Palaeontological Components of Impact Assessments and be conducted by a qualified archaeologist. No further assessment of the impacts to palaeontological resources are required as the development footprint is located within an area of negligible sensitivity as per the SAHRIS PalaeoSensitivity Map.

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 the comment.

Further comments will be issued upon receipt of the above requested report and updated BAR with appendices that includes the results of the field-based HIA.

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

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**ADMIN:**  
Direct URL to case: <https://sahris.sahra.org.za/node/571675>