

Our Ref:



an agency of the
Department of Arts and Culture

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CaseID: 16491

Date: Friday June 11, 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: Mr Humbulani Mashau
Department of Mineral Resources - Northern Cape
65 Phakamile Mabija Street
Perm Building
Kimberley

Mbeu Ntsu (Pty) Ltd has applied for Iron Ore & Manganese in Hotazel area in farm Goold 329 portion 1 & 2, Simondium 308 and Constantia 309 which is in Northern Cape Province.

MNB Holdings (Pty) Ltd have been appointed by Mbeu Ntsu (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on farm Goold 329 portion 1 & 2, Simondium 308 and Constantia 309, Northern Cape (NC30/5/1/1/2/12479PR).

A draft Basic Assessment Report (BAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed prospecting will include site clearance, 10 boreholes (120 m² each), accommodation and ablutions, equipment and storage, and access roads. It is noted that the exact locations of the boreholes will be decided once desktop studies and field mapping has ben completed.

A report dated 2012 has been submitted to address the 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. 2012. Archaeological Scoping Report for the Proposed Prospecting for Iron Ore and Manganese Ore for Amari Manganese (Pty) Ltd on the Farms Constantia 309, Simondium 308 and Portions 1, 2, 3 and 8 of the Farm Goold 329.

It is noted that field work was conducted as part of the assessment, however, no access to the farm Constantia was provided. A total of six (6) heritage resources were identified within the affected farm portions. These include three (3) homesteads of high significance, one (1) structure of high/medium significance and two(2) burial grounds of high significance. A burial ground is located near to the modern homestead on the



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farm Simondium, but no exact location was provided. Several surface scatters of Stone Age lithics were identified on farm Goold

Recommendations provided in the report include the following:

- It is recommended that prospecting sites be visited by a qualified archaeologist prior to any activity in order to deliver specialist input and ensure that heritage resources are not impacted on.
- A full Phase 1 Archaeological Impact Assessment (AIA) should be performed preceding any development, as required by Heritage Legislation.
- In this area, archaeological remains generally occur along drainage lines, water sources and rocky outcrops (e.g. Stone Age Material and Rock Art) and these natural features should be regarded as potentially sensitive. It is recommended that development / construction activities near such areas be carefully monitored by a professional archaeologist in order to minimise impact on heritage resources.
- Farmsteads on farms in this section of the Northern Cape generally date to the Historical Period and in most cases family graves and burials occur within the context of farmsteads. These areas are therefore sensitive and should be excluded from development as far as possible. This is particularly relevant in connection with the farm Constantia 309 since a site visit could not be arranged.
- It is recommended that the homestead on Simondium 308 be retained as it appears to be older than 60 years and is consequently protected under the National Heritage and Resources Act (25 of 1999). Another structure of which the age could not be determined, but may date to historical times, is located on the southern boundary. A qualified archaeologist would also have to record the structure and obtain a destruction permit should the need arise to demolish the structure
- According to the farm owner of Simondium 308 one grave is located within a two kilometre radius of the homestead, but the exact location is unknown. It is therefore recommended that a sufficient study be carried out to determine the location of this grave in order to avoid possible damage during construction phases should development occur in this area. Should the grave be located a 100m conservation buffer will be placed around it.
- It is recommended that the homesteads on portions one and two of the farm Goold 329 and Simondium 308 be retained as they appear to be older than 60 years and is consequently protected under the National Heritage and Resources Act (25 of 1999). A qualified archaeologist would also have to record the structure and obtain a destruction permit should the need arise to demolish the structure.
- It is recommended that a conservation buffer of 100m be placed around the two graveyards located on portion one of the farm Goold 329 as graves are protected under the Human Tissue Act (65 of 1983) and Ordinance on the Removal of Graves and Dead Bodies (Ordinance 7 of 1925) while graves older

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than 60 years are protected under the National Heritage and Resources Act (25 of 1999).

- Because archaeological artefacts generally occur below surface, the possibility exists that other culturally significant material and skeletal remains may be exposed during development and construction phases, in which case all activities must be suspended pending further archaeological investigations by a qualified archaeologist (See National Heritage and Resources Act, 25 of 1999 section 36 (6)). From a heritage point of view development may proceed subject to the abovementioned conditions and recommendations.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an updated desktop assessment of the impact to heritage resources be conducted as part of the EA process. The assessment must comply with section 38(3) of the NHRA and the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessments. Additionally, the development footprint is located in an area of moderate palaeontological sensitivity as per the SAHRIS PalaeoSensitivity map. Therefore, a desktop Palaeontological Impact Assessment must be conducted as part of the updated HIA. The PIA must be conducted by a qualified palaeontologist and must comply with the 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments.

The applicant is advised to extend the BAR process in terms of section 19(1)b of the NEMA EIA regulations in order to comply with this comment.

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

Prospecting Right Application by Mbeu Ntsu (Pty) Ltd for Iron Ore & Manganese in Hotazel

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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/574396>
(DMR - NC, Ref: NC30/5/1/1/2/12479PR)

Terms & Conditions:

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.