

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: 16720

Date: Tuesday April 26, 2022  
Page No: 1

## Interim Comment

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

Attention: Golden Tropic Mining (Pty) Ltd

Postal: 304 Manhattan Quarter, Esplanade Road, Century City 7441  
Physical: 4 Penning Road, Century City, Milnerton 7441

**Tropic Mining (Pty) Ltd (Golden Tropic) is applying for a mining right and associated Environmental Authorisation (EA) and Waste Management Licence (WML) in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), the National Environmental Management Waste Act (Act No. 59 of 2008) (NEM: WA) and the section 22 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) (MPRDA), as amended. The proposed mining project will cover an area of 2 627.28 hectares and is located on a Portion of Zwart Modder Mountain No. 446 (445) approximately ±45km North East of Pofadder Kai! Garib Local Municipality situated in the ZF Mgcawu District Municipality, Northern Cape Province.**

Ndi Geological Consulting Services (Pty) Ltd have been appointed by Golden Tropic Mining to conduct an Environmental Authorisation (EA) Application for proposed mining activities on Portion of Zwart Modder Mountain No. 446 (445), near Pofadder, Northern Cape Province (NC 30/5/1/2/2/10193 MR).

A draft Scoping Report (DSR) 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 mining activities will include cutting and dressing of bedrock, access roads and explosives within an application area of 2 627.28 ha.

The DSR notes that an assessment of the impact to heritage inclusive of a palaeontological study will be undertaken during the EIA phase.

In an Interim Comment issued on the 30/07/2021, SAHRA noted the pending heritage reports and awaited their submission before further comments would be issued. Since the issuing of the Interim Comment, the heritage reports have been submitted for review (11/04/2022) and the DEIA.

*Durand, J. F. 2021. Desktop Study: Palaeontology. Proposed Mining Right and Waste Management Licence for the Proposed Mining of Granite on a Portion of Zwart Modder Mountain No. 446 (445) in the Kai! Garib*

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*Local Municipality, Northern Cape Province.*

The proposed development area is underlain by igneous and metamorphic rocks of the Namaqua-Natal Province that do not contain fossils, which are overlain by Quaternary aged sand, scree, gravelly and sandy soil that may contain fossils such as mollusc shells, isolated bones, root casts and ostrich eggshells. A Chance Finds Procedure is recommended to be implemented.

*Miilo, T. 2022. Phase 1 Archaeological and Heritage Impact Assessment Report for the Proposed Mining Right and Associated Environmental Authorisation and Waste Management Licence (WML) for the Proposed Mining of Granite on a Portion of Zwart Modder Mountain No. 446 (445) in the Kai! Garib Local Municipality, Northern Cape Province.*

A total of three heritage resources that we previously identified in a 2013 HIA are located within or just outside of the mining right area. These include a small rock shelter with artefacts of low heritage significance within the mining right area, one early 20<sup>th</sup> century house of low heritage significance outside of the mining right area and one burial ground consists of six burials outside of the mining right area. No additional heritage resources were identified.

Recommendations provided in the report include the following:

- If the already known sites cannot be protected, then they should be mitigated prior to approval of a mining right;
- A Chance Finds Procedure must be implemented.

### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the HIA be revised to include a tracklog of the survey conducted as part of this HIA, the distance of the two heritage sites from the boundary of the development and recent photographs of the identified heritage resources be provided.

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

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

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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/577135>  
(DMR - NC, Ref: NC 30/5/1/2/2/10193 MR)