



an agency of the  
Department of Arts and Culture

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CaseID: 16734

Date: Friday July 30, 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: Kamgab Minerals

#### Update of existing EMP for Swartberg Mine. Northern Cape

Site Plan Consulting have been appointed by Kamgab Minerale (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed mining activities at the Swartberg Feldspar Mine near Violsdrift, Northern Cape Province (NC30/5/1/2/3/2/1(552)MR).

A draft Scoping Report (DSR) 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 mining activities will include an amendment to the existing EMP to allow for continued mining and backfill the main (old) excavation with all waste rock material and to explore new section within the 401.7 ha mining right area.

The DSR notes that no heritage assessment should be required as the area is extensively disturbed, however new areas in the Kloof section are to be explored. It is also unclear if any assessment of the impact to heritage resources was conducted as part of the original Mining Right application.

#### Interim Comment

The assessment of the impact to heritage resources is a requirement in terms of section 24(4)(b)(iii) of NEMA. Additionally, any EA application must comply with section 38(8) and 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

However, as the area is highly disturbed and the area to be explored in the Kloof section is small, a Letter of Recommendation for Exemption for Further Studies may be provided as per the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessments. This report must be compiled by a qualified archaeologist and submitted as part of the EIA phase of the EA application.

No further assessment of the impact to palaeontological heritage is required as the proposed development footprint is located in an area of low to negligible sensitivity for palaeontological resources as per the SAHRIS

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PalaeoSensitivity map.

The draft EIA and appendices must be submitted in order for an informed comment to be issued.

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

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/577186>  
(DMR - NC, Ref: NCS30/5/1/2/3/2/1(552)MR)