

**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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[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 16938

Date: Tuesday February 08, 2022  
Page No: 1

## **Final Comment**

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

Attention: Tawana Hotazel Mining (Pty) Ltd

**The proposed Tawana Hotazel Mine (THM) is located approximately 1 km south-east of the town of Hotazel in the Northern Cape Province. The THM largely incorporates the historical Hotazel Manganese Mine (HMM), including the residual opencast void, surface dumps of low-grade material and the mothballed processing plant and rail loadout facility. HMM stopped production in 1989. The area was historically mined by both opencast and underground means and yielded high grade manganese ore. All current plans for the project specifically exclude underground mining. The overall area applied for is approximately 154 Ha (inclusive of the MR application area and access road). Surface infrastructure will include the opencast pit (incorporating the historical HMM void and further expansion of the opencast footprint), in-pit waste dumps (residue material), surface residue handling / storage, vehicle yard, workshop, access and haul roads, offices, stores, processing plant for the crushing and screening of mined ore, product stockpile area, run of mine pad, refuel bay and water management infrastructure.**

Prime Resources (Pty) Ltd has been appointed by Tawana Hotazel Mining (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed mining activities on portion of portion 1 (RE) of the farm York A 279 and RE Farm Hotazel 280 (Portion of RE), near Hotazel, Northern Cape Province (NC 30/5/1/2/2/10197MR).

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 incorporate the historical Hotazel Manganese Mine. Surface infrastructure will include the open cast pit, in-pit waste dumps, surface residue handling/storage, vehicle yard, workshop, access and haul roads, widening of existing access roads, offices, stores, processing plant, product stockpile area, run of mine pad, refuel bay and water management infrastructure.

Archaetnos Culture and Cultural Resource Consultants has been appointed to provide heritage specialist input into 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).

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*Van Vollenhoven, A. C. 2020. Baseline Report for the Heritage Impact Assessment related to the Proposed Tawane Hotazel Mine, Northern Cape Province.*

The desktop study found that heritage in the surrounding area includes highly significant Stone Age sites, historical structures associated with colonial settlements and early mining activities, and graves. The proposed mining area is almost entirely disturbed and thus no finds are expected. A Chance Finds Procedure is recommended.

The draft Scoping report refers to a Palaeontological Impact Assessment (PIA), however, no assessment has been submitted to SAHRA for review and comment.

In an Interim Comment issued on the 03/09/2021, SAHRA requested clarity on the age and significance of the "historical Hotazel Manganese Mine (HMM)" and any associated historical mining structures within the proposed development area. If the historical HMM proved to be defined as a heritage resource, a revised HIA inclusive of field-survey must be conducted as part of the DEIA phase of the EA application process. The conducted PIA must be submitted to SAHRA for review and comment. Since the issuing of the Interim Comment, the PIA, revised HIA and DEIA have been submitted for review (10/01/2022).

*Bamford, M. 2021. Palaeontological Impact Assessment for the proposed Tawana Hotazel Mine, Northern Cape Province.*

The proposed development footprint is underlain by aeolian sands of the Kalahari Group that do not preserve fossils and no palaeo-pans or palaeo-springs are present in the area. A Fossil Chance Finds Protocol should be added to the EMPr.

*Van Vollenhoven, A and Smit, J. 2022. A Revised Report on a Heritage Impact Assessment for the Proposed Tawana Hotazel Mine, Hotazel, Northern Cape Province.*

The revised report states that the historical mine dates to 1959 noting that it is unknown when the infrastructure was added to the mining area, however, some infrastructure may be older than 60 years. There are several similar mining shafts in the area and will have limited heritage significance, and the historical mine infrastructure will not be impacted by the proposed development. No other heritage resources are located within the application area. Recommendations provided in the report include a Chance Finds Procedure.

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The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and 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 EMPr:

- 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/ Ngqalabutho Madida 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 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 SAHRA for record purposes;
  - The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

Yours faithfully

**Mining Right Application and Environmental Authorisation process on farm  
Hotazel 280 and York 279**

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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/579757>  
(DMR - NC, Ref: NC 30/5/1/2/2/10197MR)

**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.