

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: 16961

Date: Friday September 10, 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: Barzani Mining (Pty) Ltd

Barzani Mining (Pty) Ltd is applying to prospect for Copper, Iron, Lead, Zinc, Manganese and Nickel on the remaining extent of Barst Vley Farm No. 192, portions 1 and remaining extent of Doorn Knie Farm N0.193, portions 1, 3,4,5 and 6 of Sand Kolkjes Farm No.194 and the remaining extent of Sandkolk Farm No.159 near Kenhardt Town, within the Kai !Garib Municipality.

Basia Environmental Consultants has been appointed by Barzani Mining (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on the remaining extent of Barst Vley Farm No. 192, portions 1 and remaining extent of Doorn Knie Farm N0.193, portions 1, 3,4,5 and 6 of Sand Kolkjes Farm No.194 and the remaining extent of Sandkolk Farm No.159 near Kenhardt Town, within the Kai !Garib Municipality (NCS 30/5/1/1/2/ 12750 PR).

A draft Basic Assessment Report (DBAR) 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). It must be noted that the public review process was concluded on the 16 July 2021 as per page vi of the DBAR, however, the application was only created on SAHRIS on the 12 August 2021. The proposed prospecting activities will include 15 boreholes. The location of the boreholes is known as described on page 37 and 38 of the DBAR.

No assessment of the impact to heritage resources has been provided in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an assessment of the impact to heritage resources be conducted as part of the EA application process and requests that the assessment comply with section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). Additionally, the assessment of the impact to archaeological resources must be conducted by a qualified archaeologist and comply with the 2007 SAHRA Minimum Standards: Archaeological and Palaeontological Components of Impact Assessments.

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As the prospecting rights application area is located in an area of moderate sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map, a desktop Palaeontological Impact Assessment (PIA) must be required to be undertaken by a qualified palaeontologist. (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

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 this comment.

Further comments will be issued upon receipt of the above requested reports and a revised DBAR that includes the results of the heritage assessments.

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

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/580054>
(DMR - NC, Ref: NCS 30/5/1/1/2/ 12750 PR)