REF NO: NCS 30/5/1/1/2/ 12750 PR

Our Ref:



an agency of the Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za South African Heritage Resources Agency | 111 Harrington Street | Cape Town P.O. Box 4637 | Cape Town | 8001 www.sahra.org.za

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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 No.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 No.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).

In an Interim Comment issued on the 10/09/2021, SAHRA requested 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). Since the issuing of the Interim Comment, an HIA and PIA have been submitted for review (23/05/2022).

Bamford, M. 2022. Desktop Study: Palaeontological Impact Assessment for the proposed Prospecting Right Application for the remainder of Farm Barst Vley 192, west of Kenhardt, Northern Cape Province.

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The proposed development area is underlain by the potentially fossiliferous Dwyka Group diamictites and tillites which may contain fragmentary plant fossils, silicified wood or invertebrates of Late Carboniferous to early Permian age. Aeolian Quaternary sands are also present that may cover trapped fossils in palaeo-pans and palaeo-springs, and Miocene palaeo-channels may also trap silicified wood. A Fossil Chance Find

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Protocol is recommended to be implemented.

Matenga, E. 2022. Phase 1 Heritage Impact Desktop Assessment & Palaeontological Desktop Assessment for a Mine Prospecting Right Application on the Remainder of Barst Vley 192 near Kenhardt Town, in the Kai !Garib Municipality, Northern Cape.

No field-assessment was undertaken for the proposed prospecting. The specialist has provided an indication of the probability for the occurrence of several heritage resources within the proposed development area. These include a 50% probability of the occurrence of burial grounds, 10% probability of sites of Grade 3A and Grade 3B heritage significance such as farmsteads and rock art, and a 99,99% probability of sites of Grade 3C heritage significance such as Stone Age lithic scatters.

Recommendations provided in the report include the need for a Heritage Chance Finds Procedure.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) requests that an assessment of the impact to heritage resources be conducted for the entire prospecting rights area, as currently only the farm Barst Vley has been assessed by both heritage specialists. Additionally, as the locations of the boreholes are known, a field-assessment HIA must be undertaken.

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

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

Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit

South African Heritage Resources Agency

ADMIN:

Direct URL to case: https://sahris.sahra.org.za/node/580054

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