

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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Enquiries: Natasha Higgitt
Tel: 021 462 4502
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CaseID: 17327

Date: Thursday November 11, 2021
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Final Comment

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

Attention: Kasimira Trading 82 (Pty) Ltd

P O Box 19728
TESCOMA
5214

PROPOSED MINING RIGHT ON WOLFBERG 187/RE, NAMAKWALAND MAGISTERIAL DISTRICT, NORTHERN CAPE

Groenberg Enviro (Pty) Ltd has been appointed by Kasimira Trading 82 (Pty) Ltd to conduct an Environmental Authorisation Application for proposed Mining Right activities on the farm Wolfberg 187/Re, Namakwaland Magisterial District, Northern Cape (NC30/5/1/2/2/10194MR).

A draft Environmental Impact Assessment Report (DEIAR) 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 that will cover 2 199.574 ha include blasting, crushing at processing plant, scraping together of pebble conglomerate, topsoil stockpiles, administration building, workshops, waste management areas, upgrading of sewage plant, storm water infrastructure, fencing and access control.

John Pether and ASHA Consulting (Pty) Ltd have been appointed to provide heritage specialist input into the EA process as per section 24(4)b(iii) of the NEMA and section 38(3) and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Pether, J. 2019. Palaeontological Impact Assessment: Mining Right Application for the farm Wolfberg 187 by Kasimira Trading 82 (Pty) Ltd.

The proposed development footprint is underlain by basal gravels of the older Buffelsrivier fluvial formation that have been correlated with the fossiliferous Arrisdrift Formation. No fossils have been reported from the fluvial terrace deposits and the previous mining activities would have disturbed and destroyed any potential fossils. A Chance Finds Procedure is recommended to be implemented.

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Orton, J. 2020. Heritage Impact Assessment: Proposed Mining Right on Wolfberg 187/RE, Namakwaland Magisterial District, Northern Cape.

A total of 55 heritage resources were identified within the proposed development area. These include sites of low to negligible significance such as surface scatters of Stone Age lithics and pottery, flaked quartz outcrops, ostrich eggshell fragments, historical scatters of metal, glass and porcelain. Two sites were rated as heritage resources of Grade IIIB significance, these include a large Later Stone Age site containing lithics, grooved lower grindstone, hammer stone, ostrich eggshell fragments and pottery, and another site containing pottery, marine shell, bone and ostrich eggshell. One burial ground of Grade IIIA significance was identified. A copper mining complex consisting of several sites of Grade IIIA significance was recorded.

Recommendations provided in the report include the following:

- The identified significant archaeological sites and their buffers must be included on mine maps and if any are to be disturbed for any reason then archaeological mitigation must be effected (under a permit issued by SAHRA) and approved by SAHRA prior to commencement of mining work;
- The historic copper mining complex and grave site should be avoided altogether (See Grade IIIA sites on figure 50 of the HIA);
- A Chance Finds Procedure is recommended.

Final Comment

The following comments are made as a requirement in terms of 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 EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit and the Burial Grounds and Graves (BGG) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- APM Unit conditions: The buffers as provided in Figure 50 must be adhered to. If it is not possible to avoid impact to the archaeological sites, permits in terms of section 35 of the NHRA must be applied for prior to any construction activities;
- BGG Unit conditions: The identified burial ground must be conserved in-situ with a 100m buffer-zone and a fence (access gate inclusive). A HMP must be developed for effective management of the site.

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Should it prove impossible to retain the burial ground, a permit in terms of S35 must be sought for their relocation to a local municipal cemetery.

- 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/Mimi Seetelo 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 must be submitted to the SAHRIS application for record purposes;
 - The decision regarding the EA application and MR application must be submitted to the SAHRIS application for record purposes.

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

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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/585362>
(DMR - NC, Ref: NC30/5/1/2/2/10194MR)

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.