

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: 18481

Date: Friday May 27, 2022  
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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: Ms Yvette Mmanasoe  
GEOVICON ENVIRONMENTAL (PTY) LTD  
42 AG Visser  
Gholfsig  
Middelburg  
1050

**National Treasure Minerals (Pty) Ltd (Reg. No. 2016/265134/07:) applied for a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) (MPRDA) and is also applying for authorisation of listed activities in terms of sections 24 and 24D of the National Environmental Management Act, 1998 (Act no. 107 of 1998) (NEMA), read together with Regulations 19 & 20 of the amended Environmental Impact Assessment Regulations, 2014 (Government Notice No. 982).**

Geovicon Environmental (Pty) Ltd has been appointed by National Treasure Minerals (Pty) Ltd to undertake an Environmental Authorisation Application for proposed prospecting activities on portions 29, 30 and 7 of farm Kafferstad 195 IS near Hendrina, Mpumalanga Province (MP 30/5/1/1/2/16892PR).

A Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed prospecting application area will cover 5 ha and include 10 drill holes, bulk sampling (3 x 200 m x 200 m) access tracks, haul roads, water tank, hazardous and general waste storage, stockpiles, storm water infrastructure and rehabilitation.

No assessment of the impact to heritage resources has been conducted as part of the EA application 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) that complies with section 38(3) of the NHRA.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an assessment of the impact to heritage resources be completed as required by section 24(4)b(iii) of NEMA that complies with

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section 38(3) of the NHRA as required by section 38(8) of the NHRA. The HIA must include an archaeological and palaeontological component.

The archaeological component of the HIA must be conducted by a qualified archaeologist and must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see [www.asapa.co.za](http://www.asapa.co.za) or [www.aphp.org.za](http://www.aphp.org.za) for a list of qualified archaeologists).

The proposed prospecting footprint is located in an area of very high sensitivity as per the SAHRIS PalaeoSensitivity Map. Therefore, a field-based Palaeontological Impact Assessment must 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.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

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. A revised BAR with the results of the above requested specialist studies must be completed.

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

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**ADMIN:**  
Direct URL to case: <https://sahris.sahra.org.za/node/596441>  
(DMR-MP, Ref: MP 30/5/1/1/2/16892 PR)