

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 19139

Date: Wednesday August 24, 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: Morgenson Mining (Pty) Ltd

**Environmental Authorisation Application for the proposed Prospecting Right without bulk sampling application for the prospecting of Diamonds Alluvial (DA), Diamonds General (D), Diamonds in Kimberlite (DK) and Diamonds (DIA) including associated infrastructure, structure and earthworks on Portion 1 of the Farm Korridor 21, Registration Division: Namaqualand RD, Northern Cape Province. The property is located approximately 53km North East of Port Nolloth in the Northern Cape Province.**

Milnex Environmental Consultants CC have been appointed by Morgenson Mining (Pty) Ltd to undertake an Environmental Authorisation Application for proposed prospecting activities on Portion 1 of the Farm Korridor 21, near Nababeep, Northern Cape Province (NCS 30/5/1/1/2/1/1260PR).

A draft Basic Assessment Report (DBAR) and Environmental Management Programme (EMPr) 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 activities include 300 boreholes and 200 pits (3 m x 2 m x 4 m deep).

Banzai Environmental (Pty) Ltd and Francois Coetzee were appointed to provide heritage specialist input into the EA process as per 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.

*Butler, E. 2022. Palaeontological Desktop Assessment for the Proposed Prospecting Right Application without Bulk Sampling for the Prospecting of Diamonds Alluvial (Da), Diamonds General (D), Diamonds in Kimberlite (Dk) & Diamonds (Dia) on Portion 1 of the Farm Korridor 21, Registration Division: Namaqualand Rd, within the Northern Cape Province.*

The proposed development area is underlain by sediments of the Orange River Group, Vioolsdrift and Richtersveld Suite that do not contain fossils, while the Nama Group sediments may contain microbialites, metazoans, thrombolite and stromatolites, and Ediacaran shelly invertebrates and trace fossils. A Chance Find Protocol is recommended to be implemented.

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*Coetzee, F. 2022. Desktop Cultural Heritage Assessment: Proposed Prospecting Application for Diamonds Alluvial, Diamonds General, Diamonds in Kimberlite and Diamonds near Vioolsdrift, Namaqualand, Namakwa District Municipality, Nama Khoi Local Municipality, Northern Cape.*

It is noted that a desktop assessment was conducted, and no site visit was undertaken. The report notes that low density Middle Stone Age and Later Stone Age lithic scatters, rock art sites (engravings) and graves may be present in the proposed development area.

In addition, the report noted that the proposed development is located within the buffer of the Richtersveld Cultural and Botanical Landscape World Heritage site and a heritage survey will be mandatory.

Recommendations provided in the report include the following:

- A Phase 1 Heritage Assessment be conducted of the proposed areas earmarked for prospecting;
- A Chance Finds Procedure should be implemented.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a field-based HIA be undertaken as part of the EA process that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA.

The Richtersveld Cultural and Botanical Landscape World Heritage Site is protected by the National Environmental Management: Protected Areas Act, Act 57 of 2003 (NEMPAA) which is administered by the Department of Forestry, Fisheries and the Environment (DFFE) and therefore should be consulted.

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

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

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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/601958>