

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: 19193

Date: Wednesday August 24, 2022  
Page No: 1

## Interim Comment

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Georgia Avenue Investments 128 (Pty) Ltd

**Prospecting Activities within the Prospecting Right Area, Using Desktop Study, Geological Mapping, Geophysical Survey, Diamond Core Drilling together with all associated infrastructure and activities. These include site establishment (access to site and campsite), pegging of drilling sites, drilling of exploration boreholes with associated sumps, logging and sampling of drilled cores and site rehabilitation.**

Crysol (Pty) Ltd has been appointed by Georgia Avenue Investments 128 (Pty) Ltd to undertake an Environmental Authorisation Application for proposed prospecting activities on Portion R of the farm Onder Plaats 401, near Upington, Northern Cape Province (NC 30/5/1/1/2/12698 PR).

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 activities include 10 drill holes, access tracks, campsite, topsoil storage and site rehabilitation.

No assessment of the impact to heritage resources has been conducted 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.

### Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an field-based assessment of the impact to heritage resources 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 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).

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The proposed development is located within an area of moderate Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a desktop Palaeontological Impact Assessment (PIA) 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 location of the development must be mapped on the GIS section of the SAHRIS application (page 3).

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 DBAR 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 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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/602496>  
(DMR - NC, Ref: NC30/5/1/1/2/12698PR)