

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: 19309

Date: Tuesday September 13, 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: Mr Ronald Ramagwedzha
Mavu Group (Pty) Ltd

Mavu Group (Pty) Ltd has lodged a prospecting right application that requires statutory comments from the Heritage Agency.

Thevha Sustainable Services have been appointed by Mavu Group (Pty) Ltd to undertake an Environmental Authorisation Application for proposed prospecting activities on Farm Koegas 324 situated within the Magisterial District of Prieska, Northern Cape Province (NC/30/5/1/1/2/13019PR).

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 an initial 30 RC drilled holes and thereafter 25 diamond drilled holes, with a current eight (8) drill holes that have been targeted, possible trenches (2 m x 2 m), site camp, ablution facilities, sample and equipment storage, and temporary site offices, covering an application area of 3 161 ha.

It is noted that the DBAR refers to an identified burial site, however, no assessment of the impact to heritage resources as 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 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 or 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 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

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit

Prospecting Right Application on Koegas Farm

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/603221>