

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
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CaseID: 19334

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: Trentra (Pty) Ltd

Trentra (Pty) Ltd (Reg. No.:2017/540167/07) applied for a prospecting right and is also applying for authorization of listed activities. The above-mentioned application involves the prospecting for coal. These activities will occur on a portion of portion 21 of the farm Roodepoort 40 IS, situated in the Magisterial District of Ga-Nala, Mpumalanga Province.

Geovicon Environmental (Pty) Ltd have been appointed by Trentra (Pty) Ltd to undertake an Environmental Authorisation Application for proposed prospecting activities on portion 21 of the farm Roodepoort 40 IS, near Kriel, Mpumalanga Province (MP 30/5/1/1/2/17279 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 boreholes, sumps (1 m³ each), topsoil stockpiles, access tracks, hazardous and general waste storage, covering an application area of 247 ha.

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 and very high Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a field-based 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

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/603702>
(DMR-MP, Ref: MP 30/5/1/1/2/17279 PR.)