

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 20232

Date: Thursday January 12, 2023  
Page No: 1

## Interim Comment

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

Attention: DNA RESOURCES (PTY) LTD

### **Proposed geological and drilling activities on the farms Commissioners Vley 196, Wolfkop 1141, Wolfkop 1186, Bitter Puts 205, Bitter Puts 207, Botter Puts 231 and Bitter Puts 233, situated in the magisterial district of Calvinia, Northern Cape Province**

Lindie Wiehahn Consulting has been appointed by DNA Resources (Pty) Ltd to undertake an Environmental Authorisation Application for proposed prospecting activities on the farms Commissioners Vley 196, Wolfkop 1141, Wolfkop 1186, Bitter Puts 205, Bitter Puts 207, Botter Puts 231 and Bitter Puts 233, near Brandvlei, Northern Cape Province (NC 30/5/1/1/2/13283 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 20 drilled boreholes (900 m<sup>2</sup> each) and access roads within an application area of 65 647.3754 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](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, high 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

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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

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/609768>  
(DMR - NC, Ref: NC 30/5/1/1/2/13283 PR)