

**Our Ref:**



an agency of the  
Department of Arts and Culture

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CaseID: 21320

Date: Friday August 25, 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: MaCarthy Zama Mining Resources

**Zama Mining Resources (Pty) Ltd (Zama Mining) is applying for a mining right for iron ore, manganese, and other minerals on the properties listed in the expanded motivation below. The application area is located approximately 24 km south of Kathu, immediately east of Olifantshoek and 35 km north of Postmasburg, Northern Cape in the Gamagara and Tsantsabane Local Municipal areas.**

EXM Advisory Services (Pty) Ltd have been appointed by Zama Mining Resources (Pty) Ltd to undertake an Environmental Authorisation Application for proposed mining activities on various properties, near Kathu, Northern Cape Province (NC30/5/1/2/2/10219MR).

A Draft Environmental Impact Assessment (EIA) Report 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). It must be noted that while the draft Scoping had been uploaded to the SAHRIS Case, the status of the case had not been changed to SUBMITTED, and therefore SAHRA did not provide comments during the Scoping Phase. The proposed activities include open pit mining, waste rock dumps, workshops, administrative areas, roads, pipelines, sewage treatment and PV solar facilities with prospecting in the western section of the development.

Dr Van Schalkwyk has been appointed to provide specialist heritage input into the EA application in terms of section 24(4)b(iii) of the NEMA EIA Regulations and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Van Schalkwyk, J. A. 2022. Phase I Heritage Impact Assessment: The Proposed Macarthy-Zama Mining Project to be located on the Remainder of the Farm Macarthy 559, in the Siyanda District Municipality, Northern Cape Province*

Three heritage resources were identified within the proposed development area. These include a low-density Stone Age lithic scatter of low heritage significance, an old farmstead and features of medium heritage significance and a burial ground of high heritage significance.

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Recommendations provided in the report include the following:

- A 100 m buffer must be maintained around the farmhouse and burial ground;
- A Chance Finds Procedure is recommended to be implemented;
- A Palaeontological Assessment must be completed.

*Van Schalkwyk, J. A. 2023. Phase I Heritage Impact Assessment: Application for Environmental Authorisation for Open Pit Mining and Prospecting Activities in the Siyanda District Municipality, Northern Cape Province*

A total of 21 heritage resources were identified within the proposed development area. These include Stone Age lithic scatters of low heritage significance, historical structures of medium heritage significance, and burial grounds of high heritage significance. Two modern structures such as a chapel and memorial of medium heritage significance were also identified.

Recommendations provided in the report include the following:

- A 100 m buffer must be maintained around the burial grounds;
- The historical and modern structures must be avoided, or if not possible, the sites should be mitigated with a permit;
- A Chance Finds Procedure is recommended to be implemented;
- A Palaeontological Assessment must be completed.

### **Interim Comment**

SAHRA requests that a field-based Palaeontological Impact Assessment be conducted for the McCarthy project and a desktop PIA for the Western Project. The PIAs must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments and be conducted as part of the EA application. The applicant is advised to extend the EA process in terms of section 23(1)b of the NEMA EIA Regulations in order to address this comment. Further comments will be issued upon receipt of the above requested studies.

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

Yours faithfully

# Environmental Authorisation for Open Pit Mining and Prospecting Activities- Zama Mining Resources

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Natasha Higgitt  
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South African Heritage Resources Agency

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**ADMIN:**  
Direct URL to case: <https://sahris.sahra.org.za/node/617332>  
(DMR - NC, Ref: NC30/5/1/2/2/10219MR)