

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Natasha Higgitt  
Tel: 021 202 8660  
Email: nhiggitt@sahra.org.za  
CaseID: 21815

Date: Monday August 07, 2023  
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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: Willie Oosthuizen  
Wadala Mining and Consulting Pty Ltd

### Mining Right application

Wadala Mining and Consulting Pty Ltd has been appointed by ALS Mining (Pty) Ltd to undertake an Environmental Authorisation (EA) Application in support of a Mining Right on various properties, near Deelpan, Northern Cape Province (NC 30/5/1/2/2/10227 MR).

A Draft Scoping Report (DSR) 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 activities include alluvial diamond mining, screening, water distribution pipelines, clean and dirty water system, possible storage dam and tanks, possible excavation within the 1:100 year flood line, access and haul roads, diesel tanks, clearance of indigenous vegetation, stockpiles, office complex, temporary workshop facilities, storage facilities, concrete bund walls and diesel depot, ablution facilities, salvage yard, waste disposal site

Archaetnos Culture and Cultural Resource Consultants have been appointed to provide heritage specialist input as required by 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 Vollenhoven, A. 2018. A Report on a Cultural Heritage Impact Assessment for a proposed Mining Rights Application on the Farms Folmink 331, Klooffontein 332, Middelwater 18 and Farm 597, close to Prieska, Northern Cape Province*

It is noted that no access to the farm Middlewater 18 was granted. A total of six (6) heritage resources were identified however, none of the identified sites will be directly impacted by the proposed development. These include a stone wall, a lower grinding stone, a whetstone, and a historical farmstead of low heritage significance, a farmstead and kraal of medium heritage significance, and a burial ground consisting of at least three graves of high heritage significance.

Recommendations provided in the report include the following:

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- The farm Middelwater 18 could not be surveyed, since access was not allowed. Therefore no mining or prospecting activities may be undertaken here until such time as an HIA has been done;
- Site no. 5 (graves) is regarded as an extremely sensitive site, and although it does not fall within the area of impact, the developer should ensure its protection. Therefore the site should be fenced in, a buffer zone of 20 m kept at all times and a management plan drafted to ensure the sustainable preservation of the graves;
- A Chance Finds Procedure is recommended to be implemented.

### Interim Comment

The SAHRA Development Applications Unit (DAU) requests that an updated survey of the proposed development areas be undertaken as the previous survey was undertaken in 2018 and access to Middlewater 18 was not previously allowed.

Additionally, a desktop Palaeontological Impact Assessment must be conducted as part of the EA application as the proposed development activities are located within areas of moderate sensitivity for fossil material. The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

Further comments will be issued upon receipt of the above requested reports and draft EIA inclusive of appendices.

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  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/620089>