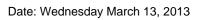
Farm 219 EMP 10318

Our Ref: NO 30/5/1/3/3/2/1/10318

Enquiries: Jenna Lavin Tel: 021 462 4502

Email: jlavin@sahra.org.za

CaseID: 792



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Letter

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

Attention: The Jaspairs Trading and Projects (Pty) Ltd

55 Wedgewood Green

1 Smith Street

Bedfordview Ext 291

2007 CONSULTATION IN TERMS OF SECTION 40 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT 2002, (ACT 28 OF 2002) FOR THE APPROVAL OF AN ENVIRONMENTAL MANAGEMENT PLAN FOR PROSPECTING RIGHT ON THE FARM NO.219, SITUATED IN THE MAGISTERIAL DISTRICT OF KURUMAN, NORTHERN CAPE REGION.

Tomose, N. G. (No date provided). JASPAIRS TRADING AND PROJECTS (PTY) LIMITED HERITAGE ASSESSMENT ON THE FARM 219 DMR FILE REFERENCE NUMBER: NC30/5/1/1/2/10318PR

The above report has reference. The SAHRA Archaeology, Palaeontology and Meteorites Unit is concerned that the report does not fulfil the requirements of the Minimum Standards for Archaeological and Palaeontological Impact Assessments, that have been circulated to all ASAPA members; we further drew attention to this matter in a recent letter to all ASAPA members (12 September 2012). These Minimum Standards are endorsed by ASAPA.

SAHRA has indicated to ASAPA members that we will no longer accept reports that do not comply with the Minimum Standards set out for AIA report writing.

This report met very few of the Minimum Standards, but the lack of a reference list or bibliography, a map of the project area, track paths and images of the heritage material identified in the area and described in the text are particularly disconcerting. Much of the report was dedicated to establishing whether or not diamonds exist on the property which is of limited heritage concern. The heritage resources identified were not photographed and the mitigation measures proposed are unclear. Although geology is discussed, it is not clearly established whether the proposed development will impact on palaeontological resources.

The majority of the report contained information not pertinent to the heritage process and the many errors in the report in terms of content and structure resulted in the report being largely incomprehensible. The submitted report fails to provide SAHRA with sufficient information to make an informed comment regarding the proposed development.

SAHRA therefore requests that a new HIA be compiled that incorporates all aspects of the heritage resources on the property, adequately described, recorded and mapped, and includes an assessment of impacts to archaeology, palaeontology, cultural landscapes, intangible and living heritage. If this report was intended as a Notification of Intent to Develop as implied by the letter of endorsement on the last two pages of the submitted report, it should be clearly indicated as such, and not submitted as a Heritage Impact Assessment.



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Date: Wednesday March 13, 2013

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We trust that you understand and support the need to adhere to professional standards and to protect our non renewable heritage. SAHRA requests adherence to the Minimum Standards in all future reports.

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

Yours faithfully

Jenna Lavin

Heritage Officer

South African Heritage Resources Agency

Colette Scheermeyer

SAHRA Head Archaeologist

South African Heritage Resources Agency

ADMIN:

(DMR, Ref: NO 30/5/1/3/3/2/1/10318 EM)

