

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  
Tel: 021 462 4502  
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CaseID: 9798

Date: Thursday August 04, 2016  
Page No: 1

## Interim Comment

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

Attention: Minerano Resources (Pty) Ltd  
4th Floor, Fredman Twoers, 13 Fredan Drive, Santon, 2196

**Minerano Resources (Pty) Ltd (“Minerao”) submitted a Prospecting Right Application to the Department of Mineral Resources (“DMR”) on 1 April 2015. The application has since been accepted by the DMR, and Minerano has been instructed to proceed with the PPP and relevant environmental processes. The Prospecting Right application has been submitted to prospect for Manganese and Iron Ore on portions 1,2,3,4,5,6,7,8 and 9 of the farm Rhenosterdrift 172. The proposed Prospecting Right area is approximately 6473.3 ha and is located 44 km South West of Bela Bela.**

Thank you for the response to comments issued on the 28 July 2016 for the proposed prospecting activities on portions 1-9 of the farm Rhenosterdrift, North West.

Minerano Resources (Pty) Ltd appointed Menar Holding to undertake an Environmental Impact Assessment Process for the proposed prospecting activities on farm Rhenosterdrift. Menar Holding completed a Final Basic Assessment Report in terms of the National Environmental Management Act, 1998 (NEMA) and the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) in support of an Environmental Authorisation for the Prospecting Right Application. A total of 10 prospecting boreholes will be dug on the farm and associated infrastructure includes a temporary camp site and hydrocarbon storage area. It is noted that existing farm roads and tracks will be used and that no additional roads will be constructed. The page 18 of the final BAR notes that a desktop study was completed for the heritage baseline of the proposed project area; however, the heritage of the area is not discussed. It is also noted that the Final BAR section of aspects for inclusion as conditions of Authorisation states heritage sites and 50 m buffer zones will be preserved at all times unless the necessary permits are obtained under SAHRA.

It must be noted that the Draft Basic Assessment Report (DBAR) was not submitted to SAHRA during the 30 day public review period, so that SAHRA could issue comments to be included in the Final BAR for submission to the Department of Mineral Resources (DMR).

In your response dated 29 July 2016, to issued comments, it is stated that the prospecting activities will commence with a desktop study of available data and that this would be completed through consultation with the Council of Geosciences and landowners. All gravesites and buildings will be buffered with at least 100 m

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Page No: 2

and up to 500 m to ensure no damage or undue disturbance occurs. Should invasive prospecting activities be required, Minerano (Pty) Ltd has committed to the following:

1. A Phase 1 Heritage Impact Assessment that focused on targeted prospecting sites;
2. A desktop Palaeontological Assessment to identify potential palaeontological sensitive's within the disturbance areas;
3. If deemed necessary from the outcomes of (2), a Palaeontological Impact Assessment;
4. Heritage sites identified in (1) and (2) will be avoided where practicable and mitigation measures implemented in accordance with the specialist recommendations;
5. In the unlikely event of a heritage sites needing to be disturbed, a Phase 2 Assessment will be undertaken in accordance with the requirements of the National Heritage Resources Act and prior to any disturbances;
6. No sites will be disturbed without the necessary permits issued by the relevant heritage authority; and
7. The above commitments are included in the Environmental Management Programme to be approved by the Department of Mineral Resources which was submitted on 27 June 2016.

### Interim Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit thanks Minerano Resources for their commitment in terms of heritage as described in the response to comments letter dated 29 July 2016. SAHRA agrees to the commitments and notes that they will be included in the EMPr for the project. The following additional comments apply and must be included in the EMPr for the project:

- The desktop study completed for the heritage baseline section of the BAR must be submitted to SAHRA for comment;
- SAHRA reserves the right to approve the proposed prospecting activities until the completion of the HIA and Palaeontological Desktop Study;
- The HIA and Palaeontological Desktop Study to be completed prior to invasive activities must be submitted to SAHRA for comment before invasive activities may commence. No ground clearance or invasive prospecting activities may commence without comments from SAHRA.

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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Page No: 3

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and  
Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/365411>  
(DMR, Ref: NW 30/5/1/1/3/11848 PR)