Our Ref:



an agency of the Department of Arts and Culture

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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: Electri City Mining (Pty) Ltd

The prospecting phase will only be: Phase 1 – Geological desktop studies and surveys, Phase 2 – Test pits and Phase 3 – Bulk Sampling.

DERA Environmental Consultants (Pty) Ltd has been appointed by Electri City Mining (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on the remaining extent of the farm Waaihoek 392, near Griekwastad, Northern Cape Province (NC 30/5/1/1/2/12454 PR).

A draft Scoping Report and has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed prospecting right application area will cover 1 011.5145 ha and will include an unknown number of test pits (2 m x 2 m x 5 m deep) with areas around each pit to be cleared of topsoil and grass (2 m x 2 m x 3.5 m), and an unknown number of trenches (10 x 6 x 5 m deep). Associated infrastructure will include a washing plant and stockpiles.

A desktop heritage study is recommended to be conducted (see page 18 of the DSR). There is also a mention of a graveyard that will require preservation and management. However, it is also noted on page 39 of the DSR that there will be no heritage specialist studies conducted.

## **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a desktop Heritage Impact Assessment be conducted as part of the EA application. The assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see <a href="https://www.asapa.co.za">www.asapa.co.za</a> or <a href="https://www.asapa.co.za">www.asapa.co.za</a> for a list of qualified archaeologists).

The proposed development is located within an area of moderate and high Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map, and therefore a desktop Palaeontological Impact Assessment (PIA) must be required to be undertaken by a qualified palaeontologist. (See Our Ref:



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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.

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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 viewscapes must also be assessed.

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

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

Yours faithfully

Natasha Higgitt Heritage Officer

South African Heritage Resources Agency

Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit

South African Heritage Resources Agency

ADMIN:

Direct URL to case: https://sahris.sahra.org.za/node/557812

## Application for Prospecting Right NC30/5/1/1/2/12454PR

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(DMR - NC, Ref: NC30/5/1/1/2/12454PR)

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