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

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CaseID: 17113

Date: Tuesday November 30, 2021

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Interim Comment

In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Isago Multi Projects (Pty) & Oraodira Trading (Pty) Ltd

PROSPECTING RIGHTS APPLICATION IN VARIOUS PORTIONS OF FARM TURFBULT ALIAS KANAAN 10 JP

Basia Environmental Consultants (Pty) Ltd have been appointed by Oraodira Trading (Pty) Ltd and Isago Multi Project (Pty) to conduct an Environmental Authorisation (EA) application for Prospecting Rights of rare earths on Portion of Portion 2 and 8 of the Farm TurfBult Alias Kanaan 10 JP. Oraodira Trading (Pty) Ltd is applying for Prospecting Rights of rare earths ore, cobalt, copper ore, gold ore, nickel ore, platinum group metals, silver ore, Sulphur and Vanadium ore on Portion of Portions 2 and 3 of the Farm TurfBult Alias Kanaan 10 JP. Both applications are situated in Ramotshere Moiloa Local Municipality under the District of Ngaka Modiri Molema Municipality, North West Province.

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA). The scope of work entails the .

Section 7.2.1. of the BAR covers aspects of the human environment including cultural heritage. It is stated in the BAR that "there are no artefacts of cultural or heritage significance at the site. If any artefacts are discovered construction will seize and a heritage specialist contacted.

Interim Comment

The SAHRA acknowledges receipt of the BAR and notes the statement contained in therein with regards to heritage resources. The SAHRA's APM Unit requests that an HIA be undertaken in terms of section 38(3) of the NHRa (25 of 1999) as part of the EA process.

The prospecting has the potential to impact negatively on heritage and/or cultural resources, therefore a heritage impact assessment must be conducted. A field-based assessment of the impact to archaeological resources must be conducted by a qualified archaeologist. The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Archaeological Component of Heritage Impact

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Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified archaeologist should they deem it appropriate.

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The prospecting is in an area moderate palaeontological sensitivity to the east, a desktop assessment of the impact to palaeontological resources must be undertaken. The assessment must be conducted by a qualified palaeontologist. The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified palaeontologist should they deem it appropriate.

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, and graves of victims of conflict must also be assessed.

Further comments will be issued upon submission of the above. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations.

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

Yours faithfully

Elijah Dumisani Katsetse

Heritage Officer

South African Heritage Resources Agency

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Enquiries: Elijah Dumisani Katsetse Date: Tuesday November 30, 2021

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Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit

South African Heritage Resources Agency

ADMIN:

Direct URL to case: https://sahris.sahra.org.za/node/582582

(, Ref:)