

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 16951

Date: Tuesday August 24, 2021  
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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: National Treasure Minerals (Pty) Ltd

**National treasure minerals (pty) ltd has applied for the proposed prospecting right application for heavy minerals, sand, monazite, rare earths, rutile, zirconium ore, zircon (gemstone), titanium, leucoxene and garnet in respect of remaining extent of the farm Nederlanden 32, remaining extent of the farm Bowie 621, remaining extent of the farm Stillrustig 548, remaining extent of the farm Jacoba 878, remaining extent of the farm Zandfonteinpan 472, remaining extent of the farm Schiedam 124, remaining extent of the farm Onzerust 557 and the remaining extent of the farm Rebelfort 288, situated in the Lejweleputswa District Municipality Within The Nala Local Municipality, Free State Province.**

National Treasure Minerals (Pty) Ltd appointed Eco Elementum (Pty) Ltd to undertake the Environmental Authorisation Application for the proposed prospecting for heavy minerals, sand, monazite, rare earths, rutile, zirconium ore, zircon (gemstone), titanium, leucoxene and garnet in the remaining extent of the farm Nederlanden 32, remaining extent of the farm Bowie 621, remaining extent of the farm Stillrustig 548, remaining extent of the farm Jacoba 878, remaining extent of the farm Zandfonteinpan 472, remaining extent of the farm Schiedam 124, remaining extent of the farm Onzerust 557 and the remaining extent of the farm Rebelfort 288, situated in the Lejweleputswa District Municipality within the Nala Local Municipality, Free State Province (FS 30/5/1/1/2/10599PR).

The draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act (NEMA, Act No. 107 of 1998) and the NEMA EIA Regulation in respect of listed activities that have been triggered in terms of the Mineral and Petroleum Resources Development Act (MPRDA, Act No.28 of 2002). No other infrastructure, offices or housing, will be present within the prospecting area and existing roads will be used as far as possible. The application area is about 1900 Hectares (ha) in extent and 20 boreholes are planned along with roads and a temporary camp site.

*Coetzee, T. 2021. Draft Archaeological Desktop Study for the Application of a Prospecting Right on Several Portions of the Farms Zandfonteinpan 472, Nederlanden 32, Rebelfort 288, Bowie 621, Schiedam 124, Jacoba 878 and Stillerustig 548, Bothaville, Free State*

A total of 26 sites consisting of a combination of buildings, huts and graves/cemeteries were noted on

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historical topographical maps. Based on contemporary satellite imagery, two of these sites are graves and the status of the two cemeteries/graves are unknown. Six of the sites are associated with intact buildings, while the remaining 18 appear to have been demolished as no surface remains are visible on satellite imagery.

The grave/cemetery sites, as well as the demolished sites and sites associated with surface remains should be avoided by the proposed prospecting activities. A full Phase 1 AIA (Archaeological Impact Assessment) must be done should any development that triggers an AIA result from the prospecting project, including if the cumulative impact of the proposed prospecting exceeds 0.5 ha.

## Recommendations

- Although the demolished sites appear not to be associated with surface remains, subsurface culturally significant material might be present. Therefore, it is recommended that these sites be avoided by the proposed prospecting activities. Should this not be possible, a qualified archaeologist should be present on-site during prospecting in order to limit potential impact on heritage resources.
- The intact sites might be of cultural significance as the possibility exists that the associated buildings and structures exceed 60 years of age. It is therefore recommended that these areas be avoided by the proposed prospecting activities. Should this not be possible, a qualified archaeologist should be present on-site during prospecting in order to limit potential impact on heritage resources.
- The areas associated with graves (B08 & B09) should be avoided by the proposed prospecting activities
- It is advised that a qualified archaeologist be contacted whenever uncertainty regarding potential heritage remains are encountered.
- Prospecting should not take place in the vicinity of stone cairns, potential burial sites, stone-walling, building ruins or any other heritage material or structures.
- Should the prospecting outcome result in further development or construction, a full Phase 1 Archaeological Impact Assessment must be conducted on the affected area if triggered. Also, a full Phase 1 AIA must be done should the cumulative impact of the proposed prospecting exceed 0.5 ha.
- Because archaeological artefacts generally occur below surface, the possibility exists that culturally significant material may be exposed during the prospecting phase, in which case all activities must be suspended pending further archaeological investigations by a qualified archaeologist. Also, should skeletal remains be exposed, all activities must be suspended and the relevant heritage resources authority contacted (See National Heritage Resources Act, 25 of 1999 section 36 (6)).

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The desktop AIA and the recommendations provided therein are noted, however SAHRA request that a field-based Heritage Impact Assessment inclusive of a desktop Palaeontological Impact Assessment (PIA) must be conducted as part of the Environmental Impact Assessment process as the development footprint is located in an area of moderate sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity Map.

The archaeological component of the HIA should follow the SAHRA 2007 Minimum Standards: Archaeological Component of Impact Assessment Report.

The desktop PIA must be undertaken by a qualified palaeontologist (See [www.palaeosa.org/heritage-practitioners.html](http://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.

Further comments will be issued upon submission of the HIA. 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

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Sityhilelo Ngcatsha  
Archaeology, Palaeontology, Meteorite Assistant  
South African Heritage Resources Agency

**PROSPECTING RIGHT APPLICATION FOR HEAVY MINERALS (FS  
30/5/1/1/2/10599 PR)**

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Phillip Hine  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/580003>