

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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CaseID: 22399

Date: Friday October 06, 2023  
Page No: 1

## Interim Comment

**In terms of Section 38(8), 38(3) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: J Hugo t/a Limestone Mining (Pty) Ltd

**Limestone Mining (Pty) Ltd (the applicant) has applied for a prospecting right for dolomitic limestone and limestone to the Regional Department of Mineral Resources and Energy (“DMRE” Free State Region) in respect of portion 1 and 3 of the farm Witkraal 878 and the farm Standard Salt Pan 1959 situated in the Xhariep District Municipality within the Letsemeng Local Municipality, Free State Province, South Africa.**

Eco Elementum (Pty) Ltd has been appointed by Limestone Mining (Pty) Ltd to undertake the Environmental Authorisation (EA) Application for the proposed prospecting for dolomitic limestone and limestone on Portion 1 and 3 of the farm Witkraal 878 and the farm Standard Salt Pan 1959, situated in the Xhariep District Municipality within the Letsemeng Local Municipality, Free State Province (DMRE REF: FS 30/5/1/1/2/10679 PR).

The Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2017 amended NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act (MPRDA 2002). The proposed project will include the drilling of several geotechnical drilling on a surface area of 693 hectares. The site be fenced and no drilling will occur outside of the fenced site. Ten trenches are planned along the salt pan and sub outcrops of possible limestone during several phases. The dimensions of the trenches will be 10 meters long by 2 meter wide, the depth will be 2 meters (depending on overburden depth).

Tobias Coetzee was appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Coetzee, T. 2023. Archaeological Desktop Study For The Application Of A Prospecting Right On The Farm Standard Salt Pan 1959 And Portions 1 & 3 Of The Farm Witkraal 878, Petrusburg, Free State*

Eight potential sites (B01 - B08) were identified on the historical aerial images and topographical maps. Four of the sites are located on the Farm Standard Salt Pan 1959 and four on Portion 1 of the Farm Witkraal 878.

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All the observed sites are associated with buildings, however five of the sites (B02, B04, B05, B06, B07) appear to have been demolished as no surface features are noted on contemporary satellite imagery.

## Recommendations

- The three sites (B01, B03, B08) associated with surface remains (Table 2) 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 the demarcated 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.
- 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.

## Interim Comment

The SAHRA Development Application Unit (DAU) notes the heritage studies along with the recommendations provided therein. A Phase 1 Archaeological Impact Assessment (AIA) must be undertaken for the proposed study area and the report must be submitted to SAHRA.

The proposed development area is located mostly within an area of high sensitivity in terms of palaeontological resources as per the SAHRIS PalaeoSensitivity map. As such, desktop Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist (See <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.

Further comments will be issued upon submission of the desktop PIA and field based AIA reports.

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

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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/625054>  
(, Ref: FS 30/5/1/1/2/10679 PR)

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.