



## Interim Comment

### In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the KwaZulu-Natal Heritage Act (Act 4 of 2008)

Attention: SLR Consulting (Africa)  
P O Box 1596

Cramerview, 2060, South Africa

**Rhino Oil and Gas Exploration South Africa (Pty) Ltd has lodged an application for an exploration right with the Petroleum Agency South Africa (PASA) in terms of section 79 of the Minerals and Petroleum Resources Development Act, 28 of 2002 (MPRDA). Minerals included in the application are oil, gas, condensate, coal bed methane, helium and biogenic gas. The exploration area is broad and encompasses large parts of the central KwaZulu-Natal (see attached list of farm names)**

Thank you for the opportunity to comment on the proposed exploration that is planned to occur in the following areas :

Harry Gwala (Sisonke) District Municipality; Umgungundlovu District Municipality; Umzinyathi District Municipality; Uthukela District Municipality; Uthungulu District Municipality; and Zululand District Municipality. The Environmental Impact Report (EIR) indicates that the application covers the early stages of an exploration application, that is , the long drawn initial non invasive stage which will help determine the sites for future on-site exploration involving core hole drilling and seismic survey. As outlined in the EIR of September 2016 the current focus of the application and the related environmental assessment work is now only on remote exploration techniques (including analysis of existing data and an aerial full tensor gradiometry gravity survey), the activity will be restricted to the flying of a light aircraft to undertake an FTG survey. Amafa also notes that at this early stage of exploration Rhino Oil and Gas is not able to specify exactly where within the ER application area future ground-based exploration activities would be undertaken.

While the specific impact area cannot be stated at this stage and non-invasive methods of exploration are going to be utilised, the developer should note that the proposed development is located in a region that's associated with significant historical ,archaeological and palaeontological finds. Once the stage at which there is intrusion of the ground is reached, the development is likely to impact on heritage resources .

For this reason a Heritage Impact Assessment of this area will automatically be required to ensure that heritage resources; features, landscapes or objects are not disturbed in any way by the proposed development. This should cover a field-based survey of archaeological features and sites as well as paleontological sites . Any other heritage resources 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, natural and cultural landscapes or viewsapes must also be assessed.

The Study should cover:

- Identification of all heritage resources in the development area and its surroundings -50m
- Assessment of the impact of the development on such heritage
- Evaluation of the impact of the development on heritage resources relative to the sustainable social





and economic benefits to be derived from the development

- Results of consultation with communities affected by the proposed development and other interested and affected parties regarding the impact of the development on heritage resources.
- Consideration of alternatives if heritage resources are affected by the development
- Mitigation plans for any adverse effects during and after completion of the project
- Table of all heritage resources identified. This should show Heritage resource type, description, location, significance and reasons for this rating.

Please download our list of Heritage Practitioners from our website [www.heritagekzn.co.za](http://www.heritagekzn.co.za).

The proposed non-invasive survey using a light aircraft can proceed as planned. The aerial photos and maps resulting from this survey should be submitted to Amafa when the intrusive survey application is lodged.

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

Yours faithfully

Bernadet Pawandiwa  
Senior Heritage Officer  
Amafa/Heritage KwaZulu Natal

Annie van de Venter Radford  
Deputy Director: Research, Professional Services and Compliance  
Amafa/Heritage KwaZulu Natal

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/367395>  
(PETROSA, Ref: 12/3/291)

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 Amafa immediately.
3. Amafa reserves the right to request additional information as required.

