

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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Date: Thursday November 25, 2021

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CaseID: 17420

Interim Comment

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

Attention: Anchor Environmental Consultants (Pty) Ltd

Trans Atlantic Diamonds applied for Environmental Authorisation and Prospecting Rights with the Department of Mineral Resources and Energy (DMRE), to prospect for diamonds; gemstones and precious minerals and metals in South African Sea Concession Areas 14A. Concession Area 14A is an inshore sea concession located between Groothoekbaai and Doringbaai on the West Coast of South Africa.

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Basic Assessment Report (DBAR) for the proposed prospecting in sea concession 14A By Trans Atlantic Diamonds (Pty) Ltd.

In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural zone is protected and falls under the jurisdiction of SAHRA's Maritime and Underwater Cultural Heritage Unit. These heritage sites or objects may not be disturbed without a permit from the relevant heritage resources authority.

The prospecting activities described in the report are a geophysical survey, core sampling, grab sampling and gravel dredging using a specialised drilling tool. The geophysical survey is non-invasive and it is proposed that both a multibeam echosounder and sub-bottom profiler will be used. The core sampling is invasive and will disturb a total surface area of approx. 1.57m. The grab sampling will take between 20-50 samples and will disturb a total surface area of approx. 5m². The most invasive sampling technique will be undertaken by a specially designed drill tool that will dredge gravel from the seabed. This will be used to target certain identified areas and it is proposed that a total area of 1500m² will be sampled using this method.

A maritime heritage study has already been undertaken as part of the application process and is included in the DBAR. The specialist study was informed by desktop research and has identified that the potential for disturbing maritime cultural heritage is low. However, records do indicate the possible presence of two wrecks



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in the concession area. *Girl Devon* sank off Doringbaai in January 1971 with the loss of 19 lives, while the *Elizabeth* sank at Mietjie Frans se Baai, north of Doringbaai in either late 1817 or early 1818, though their locations are not known. It must be noted that although the wreck of *Girl Devon* is currently not old enough to be protected by the NHRA, it should still be reported to the authorities if it is discovered as it will be a sensitive site due to the unfortunate loss of life.

The heritage study has made recommendations and mitigation measures that should be adhered to during the project, these are:

- Areas where shipwreck sites are identified during the geophysical surveys must be excluded prior to undertaking sampling activities.
- The contractor must be notified that archaeological sites could be exposed during sampling activities, as well as the procedure to follow should archaeological material be encountered during sampling.
- Any core sample sections which contain alluvial material, particularly where organic remains are present, are retained and are subject to paleo-environmental assessment.
- Any fossils found during the processing of cores must have the details of context recorded, must be kept for identification by an appropriate specialist and, if significant, be deposited in an appropriate institution.
- If shipwreck material is encountered during the course of sampling in any of the concession areas, the following mitigation measure should be applied:
 - Cease work in the directly affected area to avoid damage to the wreck until the South African Heritage Resources Agency (SAHRA) has been notified and the contractor has complied with any additional mitigation as specified by SAHRA; and
 - Where possible, take photographs of them, noting the date, time, location and types of artefacts found. Under no circumstances may any artefacts be removed, destroyed or interfered on the site, unless under permit from SAHRA.

The study has also recommended that the onboard Trans Atlantic representative must undergo a short induction on archaeological site and artefact recognition, as well as the procedure to follow should archaeological material be encountered during sampling. SAHRA supports the recommendations and

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proposed mitigation measures outlined in the heritage study.

While there are no known shipwreck sites within the proposed prospecting areas there is always the potential for unknown wrecks or shipwreck material to be uncovered during the works. Should anything of archaeological or paleontological significance be exposed during the proposed project, work must cease immediately and SAHRA must be informed of its discovery without delay. In this event, work may not commence until feedback has been received from SAHRA.

Please note that all updates and/or changes to the project, supporting documentation, correspondence, reports, or any other work relating to the project must be uploaded to the case on SAHRIS to provide SAHRA with the opportunity to comment. SAHRA does not accept emailed documents or hard-copy documents received via post.

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

Yours faithfully

Briege Williams
Heritage Officer
South African Heritage Resources Agency

Lesla la Grange
Manager: Maritime and Underwater Cultural Heritage
South African Heritage Resources Agency

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/587996>

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.