

South African Heritage Resources Agency
PO Box 4637
Cape Town
8000

19 May 2020

RE: APPLICATION FOR A PROSPECTING RIGHT – RESPONSE TO INTERIM COMMENT (CaseID: 14942)

Dear Sir/Madam

Menar Capital (Pty) Ltd (“Menar”) submitted a Prospecting Right Application to the Department of Mineral Resources (“DMR”) on 5 August 2020. The application has since been accepted by the DMR, Menar has been instructed to proceed with the PP and relevant environmental processes.

Menar submits the following in response to the interim comment for CaseID: 14942:

1. During the desktop assessment conducted in order to compile the Basic Assessment Report all SAHRA sites, as per the SAHRA spatial data, have been mapped and been given a 50m buffer. While the size of the property is large, invasive prospecting is not expected to exceed 2.88 hectares and existing roads will be used insofar as possible. In addition to the abovementioned mitigation measures, the Project Manager and Environmental Control Officer will screen drill sites for any potential heritage artifacts or remains prior to drilling.
2. The land use within the prospecting area is predominantly already altered by agricultural activities. The proposed prospecting activity is not anticipated to result in a change in character of the site. Prospecting activities footprints are limited to 10m² per boreholes with a total of 100 boreholes being planned (1000 m²), a potential site camp/ office of 0.05ha is anticipated, hence the impact has been classified as low. Existing gravel and farm roads will be utilised where possible.
3. No specialist studies were deemed necessary at this phase of the project as the project sensitivity is seen to be Moderate to low. The management plan has made allowance for mitigation measures to ensure avoidance of these sites should they be encountered, as the prospecting locations will have some degree of flexibility. Where unavoidable, the EMP stipulates that the permits must be obtained under SAHRA.
4. During the desktop assessment conducted in order to compile the Basic Assessment Report all SAHRA sites, as per the SAHRA spatial data, have been mapped and no SAHRA public sites are situated within the Prospecting Right Area. Should sites be found or noted during prospecting activities, a 50m buffer will be applied and no invasive prospecting will occur within these buffer zones unless a permit is obtained to do so.



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5. A report was generated using the Environmental Impact Assessment Screening tool and the Prospecting Right area is classified as “High” in terms of “Archaeological and Cultural Heritage Combined Sensitivity” as it falls within 1km of a protected area (Nederwelt Private Nature Reserve). During the site visit it was noted that the prospecting area has been highly disturbed, due to intensive cropland agriculture, and it isn’t anticipated that any sites of the Archaeological and Cultural Heritage remain.

APPLICABILITY OF SECTION 38(1) OF THE NATIONAL HERITAGE ACT

Section 38(1) Activities		
Activity:	Applicable:	Comment:
(a) The construction of a road, wall, powerline, pipeline, canal or other similar form of liner development or barrier exceeding 300m in length;	N/A	
(b) The construction of a bridge or similar structure exceeding 50m in length;	N/A	
(c) And development of other activity which will change the character of a site – i. Exceeding 5000m ² in extent; or ii. Involving three or more existing erven or subdivisions thereof; or iii. Involving three or more erven of division thereof which have been consolidated within the past five years; or iv. The costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority	N/A	<p>The proposed prospecting activity is not anticipated to result in a change in character of the site.</p> <p>Prospecting activities footprints are limited to 10m² per boreholes with a total of 100 boreholes being planned (1000m²) and a potential temporary site camp of 0.05 Ha (500m²).</p> <p>Existing gravel and farm roads will be utilised where possible</p>
(d) The re-zoning of a site exceeding 10 000m ² in extent	N/A	
(e) Any other category of development provided for in regulations by SHRA or a provincial heritage resources authority	X	It should be noted that, should the prospecting right be granted, the prospecting activities will commence with a desktop study of the available data. Only if deemed necessary and feasible, will further site work be undertaken. Only then will target prospecting sites within the prospecting right area be identified.



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		<p>Those sites contained in the BID are indicative only in terms of the number of holes and buffers</p> <p>identified during the Basic Assessment Report ("BAR"). It was noted in the Basic Assessment Report that the proposed boreholes were likely to change based on Desktop work. This Desktop work would be undertaken in consultation with the Council for Geosciences and the landowners to identify locations for proposed boreholes. As per the BAR the sites would then be scouted by an EAP, or suitably qualified specialist, prior to finalisation of the drilling plan to ensure that no protected species, dwellings, wetlands, gravesites and buildings, regardless of age, would be buffered to at least 100m and up to 500m if possible, to ensure that no damage to property or undue disturbance would take place on site. Invasive prospecting would entail only boreholes, which have a limited footprint and will not include trenching or other excavations.</p> <p>Heritage sites and 50m buffer zones will be preserved at all times unless the necessary permits are obtained under SAHRA.</p>
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Should you have any further queries please do not hesitate to contact the undersigned on sw@menar.com or on 011-783-7996.

Yours sincerely,

Sarah Wanless
Environmental Officer
Menar Capital