



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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Email: [jpakwe@sahra.org.za](mailto:jpakwe@sahra.org.za)  
Case ID: 25054

Date: Tuesday, 24 June, 2025

## Interim Comment

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

Nicholus Maloba  
Alidafor (Pty) Ltd  
Postnet Suite x1007  
Lyttelton  
Pretoria  
0140

Eco Elementum (Pty) Ltd was appointed by Alidafor (Pty) Ltd to undertake an Environmental Authorisation (EA) application submission for the proposed Prospecting Rights (PR) on the Remaining Extent of Portions 4 and 5 of the farm Bankpan 225 IS within the Govan Mbeki Local Municipality, Mpumalanga Province. DMRE Ref: MP 30/5/1/1/2/19117 PR.

A draft Basic Assessment Report (dBAR) was submitted in terms of the National Environmental Management Act, Act No. 107 of 1998 (NEMA) and the Environmental Impact Assessment Regulations, 2014 as amended (EIA) for activities that trigger the Minerals and Petroleum Resources Development Act, Act No. 28 of 2002 as amended (MPRDA). The proposed mineral exploration project will use Geophysical Surveys, Geotechnical Drilling, sampling and chemical analysis.

**The SAHRA Development Applications Unit (DAU) is making the following comments in terms of section 38(8) of the National Heritage Resources Act as contemplated by the EIA process in terms of section 24(4)b(iii) of NEMA:**

- The SAHRA DAU is requesting field-based Heritage and Palaeontological Impact Assessments for the proposed development in terms of section 38(8) of the NHRA.
- The field-based archaeological component of the HIA must be conducted by a qualified archaeologist and must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see [www.asapa.co.za](http://www.asapa.co.za) or [www.aphp.org.za](http://www.aphp.org.za) for a list of qualified archaeologists).
- The field-based 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.



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- The Minimum Standards refer to a Letter of Recommendation for Exemption for further studies should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.
- Further comments will be issued upon submission of these further requirements.

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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John Pakwe  
Heritage Officer: Development Applications Unit  
South African Heritage Resources Agency

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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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**ADMIN:**



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Direct URL to case: <https://sahris.org.za/node/378952>