



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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Enquiries: John Pakwe  
Tel: (063) 894-1979  
Email: [jpakwe@sahra.org.za](mailto:jpakwe@sahra.org.za)  
Case ID: 25134

Date: Tuesday, 3 June, 2025

## Interim Comment

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

Lizanne Esterhuizen  
Milnex 189 CC  
Waterberry Street  
Waterberry Square  
1st floor, Office 7  
Potchefstroom  
2520

Milnex CC was appointed by Whalbosch (Pty) Ltd to undertake an Environmental Authorization (EA) for the proposed Prospecting Right and Associated Infrastructure Application. The proposal includes prospecting of Diamond Alluvial, Diamonds General, Diamonds and earthworkds such as vegetation clearance, road construction, storage and operational facilities, establishment of stockpile areas, trial pits, trenches, water infrastructure and ablution facilities.

These activities are proposed on the Remaining Extent Of The Farm Avondster 120, Portion 3 Of The Farm Avondster 120, Portion 4 Of The Farm Avondster 120, Portion 10 (Portion Of Portion 2) Of The Farm Avondster 120, Remaining Extent Of Portion 14 Of The Farm Avondster 120, Remaining Extent Of Portion 1 Of The Farm Schoongezicht 102, Remaining Extent Of Portion 3 (Portion Of Portion 1) Of The Farm Schoongezicht 102, Portion 4 (Portion Of Portion 3) Of The Farm Schoongezicht 102, Portion 5 (Portion Of Portion 2) Of The Farm Schoongezicht 102, Portion 6 (Portion Of Portion 1) Of The Farm Twyfel 121 & Remaining Extent Of The Farm Twyfel 115.

A Scoping Report was submitted in terms of the National Environmental Management Act, Act 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 28 of 2002 (MPRDA). DMRE REF: NW30/5/1/1/2/14624PR.

**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(ii) of NEMA:**

- The SAHRA DAU is requesting field-based Heritage Impact Assessment and desktop Palaeontological



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Impact Assessment reports for the proposed developments 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 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.
- 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.
- A BAR/EIA report is required.
- 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:**

Direct URL to case: <https://sahris.org.za/node/379855>