



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: John Pakwe  
Tel: (063) 894-1979  
Email: [jpakwe@sahra.org.za](mailto:jpakwe@sahra.org.za)  
Case ID: 25624

Date: Friday, 18 July, 2025

## Interim Comment

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

ALOMABEX (PTY) LTD  
ALOMABEX (PTY) LTD  
LYTTELTON, PRETORIA  
LYTTELTON, PRETORIA  
LYTTELTON, PRETORIA  
0140

Eco Elementum (Pty) Ltd was appointed by Alomabex (Pty) Ltd to undertake an Environmental Authorisation (EA) application for the proposed Prospecting Rights Application on a Portion of Portion 18 and a Portion of Portion 97 of the Farm Heuvelfontein 215 IR within the eMalahleni Local Municipality, Mpumalanga Province. Ref: MP 30/5/1/1/2/19269 PR.

A desktop Basic Assessment Report was submitted in terms of the National Environmental Management Act, Act No. 107 Of 1998 (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 as amended, for activities that trigger the Minerals and Petroleum Resources Development Act, Act No. 28 of 2002 (MPRDA).

The proposed prospecting rights will include geophysical survey and geotechnical drilling. After each survey and drilling, a determination will be made on the nature of further prospecting if any. Core drilling and sampling will form part of such prospecting nature depending on the results of Phase 2 of the proposed prospecting activities.

#### Interim Comment:

**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 Impact Assessment and Palaeontological 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



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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.
- 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/383259>