



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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[www.sahra.org.za](http://www.sahra.org.za)

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Email: [BMotsodisa@sahra.org.za](mailto:BMotsodisa@sahra.org.za)  
Case ID: 25191

Date: Friday, 4 July, 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)

Lionel Koster  
Strata Energy Minerals & Resources (Pty) Ltd  
2.1 On The Greens, Golf Village  
2 de Beers Avenue  
Somerset West  
7130

Greenmined Environmental (Pty) Ltd has been appointed by Strata Energy Minerals & Resources (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for proposed prospecting activities of base and industrial minerals including Copper (Cu), Zinc (Zn), Lead (Pb), Silver (Ag), Lithium (Li), Baryte (BaSO<sub>4</sub>), Sillimanite-corundum (Al<sub>2</sub>SiO<sub>5</sub>), Wolframite (W)/Tungsten, and Feldspar (Fsp) on 21 217 Ha located on farms Tusschen-In No. 143, portion 1 and remaining extent of Aardvark No. 164, Steenbok No. 165, and Farm No. 166 (Gifkop) in the Namakwa Magisterial District, Northern Cape Province.

A Draft Basic Assessment Report (DBAR) and Environmental Management Programme report (EMPr) has been submitted in terms of the National Environmental Management Act, 1998 and the National Environmental Management Waste Act, 2008 in respect of listed activities that have been triggered by applications in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (as amended). The proposed prospecting activities will consist of non-invasive (desktop studies, field mapping, geophysical surveys) and invasive (exploratory drilling) components. No bulk sampling will take place, temporary infrastructure including mobile containers and chemical ablutions will be constructed.

As evident in the previous image the proposed PR footprint does not extend into any protected areas. The Richtersveld World Heritage Site and the Nababeep Protected Area lies ±25 km north of the farm Tusschen-In No 143, while the Richtersveld National Park is ±21 km north-west of Aardvark No 164 and Steenbok No 165 with the nearest point is ±13 km from the park. The farms Aardvark No 164, Steenbok No 165 and Farm No 166 (Gifkop) are also within the National Protected Area Expansion Strategy (NPAES) area.

Beyond heritage has been appointed by Greenmined Environmental (Pty) Ltd to provide heritage specialist input into the EA process in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage



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Resources Act, Act 25 of 1999 (NHRA).

*Kraljevic, L. 2025. Heritage Impact Assessment for the Prospecting Application on 21 217.1756 Hectares near Steinkopf in the Northern Cape.*

The site was subjected to a desktop study. It is recommended that this will be done when the actual exploration (invasive prospecting activities) localities are fixed.

The various farms earmarked for prospecting are situated within a larger sphere of significant archaeological sites. Stone Age sites and artefacts can be expected across the entirety of the landscape with more significant sites clustered expected on rocky outcrops, hills, and watercourses. Low density scatters relating to the ESA, MSA, and MSA can also be expected in flat plains

The HIA recommends as follows;

- Once the drill sites have been confirmed these areas have to be subjected to a heritage walk down, this should be conducted prior to the commencement of prospecting activities;
- Drill sites must be kept as close as possible to existing roads in order to minimise the impact on the landscape;
- Focal points on the landscape like rocky outcrops or pans must be avoided as far as possible as these areas could be sensitive from a heritage point of view;
- Monitoring of the Project area by the ECO during the exploration phase for heritage and palaeontology chance finds, if chance finds are encountered to implement the Chance Find Procedure.

Prof. Marion Bamford has been appointed to provide Palaeontological specialist input.

*Bamford, M. 2025. Palaeontological Impact Assessment for four prospecting right applications near Steinkopf, Namaqualand, Northern Cape Province.*

The prospecting sites lie on the non-fossiliferous metamorphosed igneous rocks of the Namaqualand-Natal Metamorphic Suite and Quaternary sands and alluvium. No fossils are known from this region

The PIA recommends the following;



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There is a very small chance that fragments of transported fossils may occur in the sands and alluvium so a Fossil Chance Find Protocol should be added to the EMPr.

On 02/07/2025, a Letter of Undertaking was uploaded to SAHRIS indicating that a field-based HIA will be conducted prior to any invasive prospecting. Following which, the results thereof will be submitted to SAHRIS for review and approval before ground disturbance.

#### Interim Comment

The SAHRA DAU acknowledges receipt of the The Letter of Undertaking from the EAP and the Applicant. However, the Interim Comment issued 24/06/2025 is upheld. A field-based assessment must be conducted to identify no-go areas and areas to avoid.

Further comments will be issued upon receipt of the above requested report and a revised BAR and EMPr that incorporates the results of the specialist assessment. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations in order to address this comment.

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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Boitshepo Motsodisa  
Heritage Officer: Development Applications Unit



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South African Heritage Resources Agency

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/380612>