

**APPENDIX F: COMMENTS AND RESPONSE FROM
IAPS RELATING TO HERITAGE**



**INTEGRATED HERITAGE IMPACT
ASSESSMENT AS PART OF THE
FINAL ENVIRONMENTAL IMPACT
ASSESSMENT AND
MANAGEMENT PROGRAMME
REPORT**

**HERITAGE RELATED EIA/EMPr
COMMENTS AND RESPONSE
REPORT**

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1 PROJECT AREA: LANDOWNERS, OCCUPANTS AND COMMUNITIES

NO	COMMENT	STAKEHOLDER	RESPONSE
	Disseldorp / Ketting Comments		
1.	In this area we have a lot of informal graves and cemeteries, are you going to respect them because they are not fenced?	Jeremy Makgwadi Ketting / Disseldorp – Lewaneng Community Member 29 September 2018 Scoping Phase	Part form the specialist studies is a Cultural and Heritage Resources Impact Assessment, who will come here for you to show them where the graves are, and we will also recommend if the they need to be fenced. The most important is to show them where this graves are, and when we come back we will indicate if they are affected.
2.	A cemetery must be built.	Harry Rapheeha Lanny Rapheeha Written submission 7 August 2019 EIA Phase	Various heritage sites which include graves, historical residential sites, Iron Age pottery and grinding stones were identified by the Heritage Specialist on Ketting and Disseldorp. There are no indications that these structures could be problematic in terms of potential structural damage. The mine will undertake the relevant mitigation as required by the Heritage Specialist. At this stage, there is no project in the Waterberg JVCo's SLP for to build a cemetery. The projects are based on consultations with the local municipality as to what is most needed. This will however be considered going forward.
	Goedetrouw / Kgatlu Comments		
3.	Will there be an impact on graves?	Community members Community meeting 3 August 2019 EIA Phase	Regarding the graves, a specialist surveyed the graves and identified the graves. Old housing kraals were also identified. The sites were used to plan the infrastructure so that none of the infrastructure will be placed at the gravesites. We are drafting a procedure to determine what to do if graves are found irrespective of the age of the grave.
4.	What is going to happen with the trees?	Manamela Manamela Community meeting 3 August 2019 EIA Phase	Biodiversity study was done and indicated that the area has good biodiversity in the mountains but not in the valleys. When they construct there will be surveyors that will determine where everything is. In terms of EIA we have determined that big trees will be left, but where there will be big infrastructure all trees will be cleared.
5.	All measures should be taken to ensure that blasting should not damage the graves and graveyard. The community wish to have further discussions with the applicant for monitoring on blasting on the graveyard.	Lawyers for Human Rights Kgatlu Community Goedetrouw 18 September 2019 Post EIA Phase	All graves and graveyards were identified prior to the mining layout being determined. Infrastructure was thus not placed in close proximity to any graves. The graves were also taken into consideration during the Blasting Impact Assessment - the assessment determined that the influence on graves are negligible. The EIAR indicated that Communities may hear and feel slight vibrations during blasting, but there should not be any damage to structures. We acknowledge that, generally, all houses have cracks due to seasonal changes in temperature, water and wind. As a precautionary measure all houses around the mine within a 1500m radius will be photographed, and their status checked before blasting commences. Sufficient notice will be given prior to each blast, so there will be no unexpected blasts. Surface blasting will only be conducted during the development of the access portals. In the unlikely event that damages occur, the damages will be evaluated and the WaterbergJVCo would be liable to pay damages it caused due to its blasting activities. Waterberg JVCo will also implement blasting control, design and charging methodology to reduce the impact. Monitoring will be done during blasting to measure vibrations and record fly rock. Scientifically there is no evidence that the blasting and vibrations will lead to earthquakes.

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NO	COMMENT	STAKEHOLDER	RESPONSE
6.	Our Graveyard: We as community of Kgatlu we say no to relocation of our graves, to avoid conflict they must play far away to our graveyard, it's our forefathers heritage and the mining company must not tempered with that. Any blast not aware of our graveyard can cause damage, the investigation team must ensure that they entertain the matter as soon as possible. The community oppose relocation of the graves. It is its heritage and the mining company should not tamper with them	Michael Choshi Goedetrouw 8 September 2019 Lawyers for Human Rights Kgatlu Community Goedetrouw 18 September 2019	No graves will be relocated. All graves were identified prior to the mining layout being determined. Infrastructure was thus not placed in close proximity to any graves. The graves were also taken into consideration during the Blasting Impact Assessment, the assessment determined that the influence on graves are negligible. Also refer to the response in item 5 below.
Early Dawn / Ga-Ngwepe Comments			
7.	When people talk about mining they humble themselves and make promises. We are telling you we do not want grave exhumation here.	Julius Molokomme Early Dawn – Ga-Ngwepe Community Member Meeting 27 September 2018 Scoping Phase	Mining at Early Dawn will be underground you can continue with surface activities; graves will not be affected.
8.	All the places where you will be working you must take care of graves. If you do not do so this matter will cause strife between us. Do not move graves.	Frans Malose Rammutla Rev. Mmaphuti Ezekiel Morifi Written submission 7 August 2019 EIA Phase	A heritage impact assessment has been undertaken, and all graves identified. The only infrastructure potentially planned on Early Dawn is one vent shaft in 20 – 25 years time. The HIA noted that there will be no impacts on graves at Early Dawn.
9.	I know of a place where children lived, now I recall it was a built heritage site.	Mr Kgabo Mack Ramoroka	A specialist has been instructed to conduct a historical built environment assessment. This information should be provided to the specialist.
10.	What will happen when the mine starts and the community gets affected, for examples houses or tombstones get damaged. I request that photos be taken before mining commences so that we can have evidence of our issues / matters.	Written submission 7 August 2019 EIA Phase	For the reasons set out above, it is very unlikely that houses will be impacted by blasting or tombstones impacted on. The EMP includes a mitigation measure as a precautionary measure, that photographic survey is done surrounding the mine area before such blasting occurs.
11.	Is there no other way that can safeguard graves from exhumation because the strife between the community and the mine is brought on by the issue of graves?	Mrs Raesetja Florah Mphahlele Written submission 7 August 2019 EIA Phase	A heritage impact assessment has been undertaken, and all graves identified. The only infrastructure potentially planned on Early Dawn is one vent shaft in 20 – 25 years time. The HIA noted that there will be no impacts on graves at Early Dawn.
12.	The issue of graves. Traditionally exhumation is not permitted.	France Ramotla Community meeting 2 August 2019 EIA Phase	Studies have been done to determine where the graves are, therefore no graves will be affected.
Old Langsine / Makgabeng Community Comments			
13.	How are the following be protected- Horses; Boreholes: Life stock and Cemeteries. Wish my 8 double garage room heavy burgundy tiled house be safely protected during the process of the project. Additional 5 roomed in the same yard also be taken care of. Rondavel	Malokane Joel Komane	The full impacts on surrounding land uses and properties are still being investigated and will be communicated to all I&AP's during the EIA phase meetings.

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NO	COMMENT	STAKEHOLDER	RESPONSE
	<p>which is used for cultural purposes, e.g. consultations, ext. Be save. Family cemetery which is within a 9-hectare field surrounding the above houses be protected. Our cultural activities are respected by other races working in the mine. A 15-hectare field for growing maize, pumpkins, groundnuts, butternuts. Cow beans and green beans be saved from any harmful factors during the process. A borehole from which the family depends on is saving. Our life stock which grazes within the community is safe from any dangerous effects like holes. A guesthouse and tuck shop next to the above-named houses also be given a response.</p> <p>Why Langbryde 324LR is prospected without agreement lease between Old Langsyne community and Waterberg Platinum Mine? When is Old Langsyne community to be paid mining fee, because it is within the prospected area? What process for the approval of mining fee? Is it not possible for the mine to extract resources underground without the concern of the community? How is the community benefit from job creations? Will there be a learner training for those who wish to work in the mine?</p>	<p>Old Langsyne Community Member Written comment 1 October 2018</p> <p>Scoping Phase</p>	<p>Various specialist reports were conducted in order to assess the impacts with regards to the concerns raised, these include-</p> <ul style="list-style-type: none"> • Heritage Impact Assessment in terms of cemeteries and cultural purposes; <p>With regards to the Goedetrouw assessment, Twenty-seven sites of cultural importance were identified in the study area. Some of these sites will be impacted on and therefore mitigation measures are proposed. (Sites as referenced in the Report):</p> <p>No impact is foreseen at Harriet’s Wish. No sites were identified, but it needs to be indicated that only a desktop study was done here. No new infrastructure is however proposed here.</p> <ul style="list-style-type: none"> • No impact is foreseen at Disseldorp. No sites were identified. It needs to be mentioned that only a small section of the (eastern side) was surveyed since the mining infrastructure is limited to this area. • No impact is foreseen at Old Langsyne. The two sites on this farm are no. 12 and 13 (graves), both identified during the 2018 survey. • No impact is foreseen at Goedetrouw. There are two sites on this farm, namely no. 25 and 26 (graves). • No impact is foreseen at Norma. There is one known site, namely no. 27 (graves). However, should it be decided that the Tailings Storage Facility be moved here, a site assessment will be needed as this farm was only investigated via a desktop study. It is therefore possible that more sites may become known. • No impact is foreseen at Early Dawn. The sites on this farm are sites no. 14-22 (graves), site 23 (historical residential remains) and site no. 24 (Iron Age pottery). However for Alternative 2 direct impact is foreseen for site 16 (graves). • Impact is mainly foreseen on the farm Ketting, but not on all the sites. <ul style="list-style-type: none"> - no direct impact is expected at the following sites - no. 4 (graves) and 10 (historical remains). Definite indirect impact is expected on the following sites – 1-2, 6-9 and 11 (graves), as well as no. 3 (Iron Age) and no. 5 (historical remains). <p>Ketting Assessment (as referenced in the Report) Impact is foreseen on the following sites:</p> <ul style="list-style-type: none"> • Grave sites – <ul style="list-style-type: none"> - Ketting – 2, 6, 8-9 and 19-21 • Historical remains – <ul style="list-style-type: none"> - Ketting – 5, 7, 17 and 30 • Iron Age – <ul style="list-style-type: none"> - Ketting – 3 • No (or secondary) impact is foreseen on the following sites: • Grave sites – <ul style="list-style-type: none"> - Ketting – 1, 13-16, 18 and 22 - Disseldorp – 24, 26-29 - Goedetrouw – 25-26 - Early Dawn – 14-22 - Old Langsyne – 12-13 - Norma – 27 • Historical remains – <ul style="list-style-type: none"> - Ketting – 4, 10-12, 23 and 25 - Disseldorp – 23 and 25 - Early Dawn – 23

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NO	COMMENT	STAKEHOLDER	RESPONSE
			<p>Both Assessments indicated that the Project may continue if the mitigation measures proposed were undertaken.</p> <ul style="list-style-type: none"> • Groundwater Impact Assessment in terms of boreholes <ul style="list-style-type: none"> - it is stated on page xiii for the Goedetrouw Assessment that "no water supply boreholes are under threat during the [life of mine]" and the same as concluded upon in terms of the Ketting location on page xi. • Blasting in terms of infrastructure (as above). <p>These specialist reports will be made available during the EIA PPP and will be incorporated into the EIA which will also be made available.</p> <p>Under the MPRDA a lease agreement is only required where the mining company will use the surface of the land and in that case compensation for the use of the land will be agreed in accordance with the requirements of the MPRDA. No mining fee is prescribed. No Surface Infrastructure nor activities are contemplated on the Langbryde property.</p> <p>An SLP will need to be approved prior to the grant of the MRA. Under the MPRDA this must include commitment to local procurement and learnerships.</p>
	Lomondside / Lekgware Community Comments		
14.	No heritage related comments received		
	Norma A & B Comments		
15.	No heritage related comments received		

2 TRADITIONAL AUTHORITIES

NO	COMMENT	STAKEHOLDER	RESPONSE
	Bahananwa Traditional Authority		
16.	Our graveyard sites and heritage sites must be respected in terms of National Heritage Resource Act 25 of 1999 (NHRA) Republic of South Africa.	Bahananwa Tribal Council 15 July 2019 EIA Phase	Impacts on heritage resources are expected to be low, and will be mitigated and managed.
	Bakone Matlala Traditional Authority		
17.	No heritage related comments received		

3 LOCAL AUTHORITIES

NO	COMMENT	STAKEHOLDER	RESPONSE
	Capricorn District Municipality		
18.	No heritage related comments received		
	Blouberg Local Municipality		

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NO	COMMENT	STAKEHOLDER	RESPONSE
19.	How does the mine coexist with heritage, especially when one looks at the Makgabela plateau.	Jonas Tlouamma Meeting 31 July 2019 EIA Phase	A heritage impact assessment was done as well as a visual impact assessment, which has indicated a very low to no impact on these heritage resources.
20.	How can the mine assist in making this heritage area a tourism destination	Jonas Tlouamma Meeting 31 July 2019 EIA Phase	This can be considered as part of the Waterberg JVCo's, further discussion will be held in this regard.
21.	<p>Based on the mining proposal for Waterberg JVCo regarding the development of the Waterberg Platinum Mine, the Blouberg Local Municipality comments as follows: The Makgabeng plateau has over 600 rock-art sites excluding Iron Age sites and historical burials. The Makgabeng plateau forms part of the Vhembe Biosphere reserve, the sixth South African Reserve and the third in Limpopo Province. The Makgabeng plateau consists of the following properties: Bayswater No 370 LR, Morgen 3070, Square roads 383, Bonna Esperance No 356 LR, Morgen 2334, Square Roods 61, De La Roche No 353 LR, Morgen 2321, Square Roods 122, Disseldorp No 369 LR, Morgen 3308, Square Roods 116, Early Dawn No 361, Morgen 3522, Square Roods 413, Groenepunt No 354 LR, Morgen 1514, Square Roods 62, Harrietswish No 393 LR, Morgen 2740, Square Roods 165, Ketting No 368 LR, Morgen 2196, Square Roods 424, Langbryde No 324 LR, Morgen 1815, Square Roods 65, Lomonside No 323 LR, Morgen 2364, Square Roods 188, Millbank No 325 LR, Morgen 2680, Square Roods 238, Millstream No 358 LR, Morgen 2738, Square Roods 184, Normandy No 312 LR, Morgen 3421, Square Roods 439, Old Langsyne No 360, Morgen 3016, Square Roods 339, Rosamond No 357 LR, Morgen 3054, Square Roods 532, Too Late No 359 LR, Morgen 2906, Square Roods 521, ... to mention but a few.</p> <p>Given the rich culture and natural heritage of the Makgabeng, the plateau is currently undergoing a nomination process which will ultimately see it declared a National Heritage site. Given the sensitivity, significance and the current status of the plateau as it forms part of the Vhembe Biosphere Reserve, the Municipality hereby advises the Waterberg JVCo to hire a competent heritage experts to carry out a Heritage Impact Assessment on and around the plateau BEFORE any mining activity is conducted. Such assessment must be finalised and made available to all relevant stakeholders to study and discuss before commencement.</p>	NJ Tlouamma Blouberg Local Municipality Dated 5 Aug 2019 Received 19 Aug 2019 Post EIA Phase	Your comments are noted. Waterberg JVCo has met with SAHRA in respect of additional studies required relating to any potential impacts that mining may have on rock art sites. The following was agreed: <ul style="list-style-type: none"> • an overarching / integrated Heritage Impact Assessment will be compiled, which will source information from various existing specialist studies such as the Air Quality Impact Assessment, Blasting Impact Assessment, Social Impact Assessment, Archeological Impact Assessment and Palaeontological Impact Assessment; • due to point data of existing rock-art and other heritage sensitive sites within the broader area is not available, it was agreed that a Heritage Sensitive area would be utilised and the methodology of determining this area will be clearly described in the report above; • additional assessment of potential blasting impacts on sensitive heritage areas will be included in the above mentioned report; • additional assessment of potential tourism impacts will be included in the above mentioned report; and the applicant will make the DMR aware of the outstanding matters in terms of SAHRA's comments

4 ORGANS OF STATE

NO	COMMENT	STAKEHOLDER	RESPONSE
	Limpopo Department of Economic Development, Environment and Tourism (LEDET)		
22.	Mining operations must be suspended and a representative of the South African Heritage Resources Agency (SAHRA) and/ or Limpopo Heritage Resources Agency (LIHRA) be contacted immediately in the event of finding or uncovering any subterranean (middens, graves, etc.) as suspected from the information provided on page 77 of the SR.	MT Mamashela LEDET Written submission 18 Oct 2018	The EIA specifically includes as a condition for inclusion in the EA that A Chance Find Procedure for heritage resources and artefacts needs to be in place. This will ensure that in the event of finding or uncovering any subterranean (middens, graves, etc.) the mining operations be be

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NO	COMMENT	STAKEHOLDER	RESPONSE
		<p align="center">EIA Phase</p>	<p>suspended and a representative of the South African Heritage Resources Agency (SAHRA) and/ or Limpopo Heritage Resources Agency (LIHRA) be contacted immediately.</p>
	<p>South African Heritage Resources Agency</p>		
23.	<p>In terms of the National Heritage Resources Act, no 25 of 1999 (NHRA), heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are generally protected. They may not be disturbed without a permit from the relevant heritage resources authority. In contexts of development applications, the developer must ensure that no heritage resources will be impacted by the proposed development, by lodging an application to SAHRA and submitting detailed development specifications as a notification of intent to develop. If the application is made in terms of s. 38 (8) of the NHRA then it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is undertaken, as s. 38(2)a does not apply. Such a study should follow the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports and section 38(3) of the NHRA.</p>	<p>Nokukhanya Khumalo Heritage Officer South African Heritage Resource Agency Written comment 4 October 2018</p> <p align="center">Scoping Phase</p>	<p>Heritage impact assessments for both the Goedetrouw and Ketting surface infrastructure alternatives have been conducted and impacts have been assessed therewith. See above. It has been indicated in these reports which graves are older than 60 years and where disturbance thereof will require a permit. In terms of the Ketting, heritage impact assessment, this would be for the following sites, all on Ketting: 2, 6, 8-9 and 19-21 9 (as referenced within the report). In terms of the Goedetrouw, this would be for grave sites 9 and 16 on Ketting and Early Dawn respectively (as referenced in the report). These reports will be made available during the EIA PPP and will further be incorporated into the EIA.</p>
24.	<p>This proposed mine will have significant impacts to the Highly Significant Makgabeng cultural landscape located within the Critical Biodiversity Area of the Vhembe Biosphere Reserve. This historical landscape spans thousands of years with evidence of various contact periods between various people groups. Even millennia considering there are recorded trace fossil of Cyanobacteria occurrences within the sedimentary rocks. The Makgabeng Plateau contains over 1000 rock art sites of the Hunter-Gatherer, Khwe and Bantu traditions, numerous significant stone walled settlements built during the Malebogo Rebellion. The proposed mining activities may have the potential to impact on significant rock art sites.</p>	<p>Nokukhanya Khumalo Heritage Officer South African Heritage Resource Agency Written comment 4 October 2018</p> <p align="center">Scoping Phase</p>	<p>Heritage Impact Assessments for both the Goedetrouw and Ketting surface infrastructure alternatives have been conducted and impacts have been assessed therewith. Rock art was assessed and identified within these reports for both Goedetrouw and Ketting. These reports will be made available during the EIA PPP and will further be incorporated into the EIA.</p>
25.	<p>Due to the Highly sensitive nature of the region, SAHRA requires that a detailed HIA is undertaken by a suitably qualified Heritage Specialist in terms section 38(3) of the NHRA. The Heritage Specialist must facilitate the undertaking of the following heritage specialist reports that must be components of the HIA report:</p> <p>An assessment of the Historical Built Environment and a cultural landscape assessment must be undertaken by a historical built environment specialist or a historical architect;</p> <p>All Visual Impacts to the stone walled sites and rock art sites must be assessed in the Visual Impact Assessment and the results must form part of the HIA and considered in the Heritage Impacts and Mitigation measures;</p> <p>The results of the dust impacts in the air quality assessment must consider the dust impacts to the rock art sites and a summary of those results must form part of the HIA and considered in the Heritage Impacts and Mitigation measures;</p> <p>The results of the impacts of blasting and vibrations must consider potential impacts to the stability of the stone walled sites and those results must form part of the HIA and considered in the Heritage Impacts and Mitigation measures;</p> <p>Tourism and the economic impacts must also be assessed due to potential restrictions of access to archaeological sites;</p>	<p>Nokukhanya Khumalo Heritage Officer South African Heritage Resource Agency Written comment 4 October 2018</p> <p align="center">Scoping Phase</p>	<p>Heritage Impact Assessments for both the Goedetrouw and Ketting surface infrastructure alternatives have been conducted and impacts have been assessed therewith. These reports will be made available during the EIA PPP and will further be incorporated into the EIA.</p>

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NO	COMMENT	STAKEHOLDER	RESPONSE
	<p>An Archaeological Impact Assessment (AIA), that complies with the 2007 Minimum Standards for the Archaeological Component in a Heritage Impact Assessment Report, must be undertaken by a suitably qualified archaeologist. The AIA must also obtain a review of the rock art sections by a rock art specialist if they are not specialised in southern African rock art research;</p> <p>A Palaeontological Impact Assessment (PIA), that complies with the 2012 Minimum Standards for the Palaeontological Component in a Heritage Impact Assessment Report, must also be undertaken by a suitably qualified palaeontologist.</p> <p>All these reports must be submitted to the relevant case on SAHRIS, and a summary of the reports must be included in the HIA report along with an assessment of the cumulative impacts to the heritage resources within the Makgabeng Cultural Landscape. Furthermore, the HIA must consider the results of the Public Consultation, as well as the Social Impact Assessment in relation to the identified heritage resources as per the requirements of section 38(3) of the NHRA.</p>		
26.	<p>If you are unaware of any archaeologists and palaeontologists a list of them working within the Heritage Resources Management field are provided in the following websites: (see www.asapa.org.za) and (see www.palaeontologicalsociety.co.za).</p>	<p>Nokukhanya Khumalo Heritage Officer South African Heritage Resource Agency Written comment 4 October 2018</p> <p>Scoping Phase</p>	<p>Noted.</p>
27.	<p>All the Scoping Report Appendices must be submitted to the case on SAHRIA, once the Final Scoping Report and the EIAR are available for public review, they must also be submitted to the case.</p>	<p>Nokukhanya Khumalo Heritage Officer South African Heritage Resource Agency Written comment 4 October 2018</p> <p>Scoping Phase</p>	<p>Noted.</p>
28.	<p>The South African Heritage Resources Agency (SAHRA) issued an Interim Comment dated 04/10/2019, whereby SAHRA stated the following: This proposed mine will have significant impacts to the Highly Significant Makgabeng cultural landscape located within the Critical Biodiversity Area of the Vhembe Biosphere Reserve. This historical landscape spans thousands of years with evidence of various contact periods between various people groups. Even millennia considering there are recorded trace fossil of Cyanobacteria occurrences within the sedimentary rocks. The Makgabeng Plateau contains over 1000 rock art sites of the Hunter-Gatherer, Khwe and Bantu traditions, numerous significant stone walled settlements built during the Malebogo Rebellion. The proposed mining activities may have the potential to impact on significant rock art sites. Due to the sensitive nature of the proposed mine right application, in order for this application to meet the requirements of section 38(8) and 38(3) of the NHRA, the following independent specialist studies must be undertaken and included in the HIA:</p> <ul style="list-style-type: none"> The Heritage Specialist must facilitate the undertaking of the following heritage specialist reports that must be components of the HIA report: 	<p>Nokukhanya Khumalo Heritage Officer South African Heritage Resource Agency Written comment 7 August 2019</p> <p>EIA Phase</p>	<p>Historical Built Environment: The Heritage Impact Assessment has identified historical building remains within the project area. There will be no direct impact on these remains, and very low indirect impact caused by dust and blasting. A Heritage Management Plan has been included in the EMPr.</p> <p>Visual Impact Assessments: A visual impact assessment has been conducted that indicates no impact on the rock art sites.</p> <p>Air Quality: There will be no dust or air quality impact on the rock-art sites</p> <p>Blasting: It is expected that there will be an indirect impact at site 7 on the farm Ketting (historical stone walling) if no mitigation is implemented. It is recommended that blasting design and management is refined and only a minimum charge utilised. This will ensure that no impact at this site. Blasting monitoring will however be conducted close to the site.</p>

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NO	COMMENT	STAKEHOLDER	RESPONSE
	<ul style="list-style-type: none"> - An assessment of the Historical Built Environment and a cultural landscape assessment must be undertaken by a historical built environment specialist or a historical architect; - All Visual Impacts to the stone walled sites and rock art sites must be assessed in the Visual Impact Assessment and the results must form part of the HIA and considered in the Heritage Impacts and Mitigation measures; - The results of the dust impacts in the air quality assessment must consider the dust impacts to the rock art sites and a summary of those results must form part of the HIA and considered in the Heritage Impacts and Mitigation measures; - The results of the impacts of blasting and vibrations must consider potential impacts to the stability of the stone walled sites and those results must form part of the HIA and considered in the Heritage Impacts and Mitigation measures; - Tourism and the economic impacts must also be assessed due to potential restrictions of access to archaeological sites; - An Archaeological Impact Assessment (AIA), that complies with the 2007 Minimum Standards for the Archaeological Component in a Heritage Impact Assessment Report, must be undertaken by a suitably qualified archaeologist. The AIA must also obtain a review of the rock art sections by a rock art specialist if they are not specialised in southern African rock art research; - A Palaeontological Impact Assessment (PIA), that complies with the 2012 Minimum Standards for the Palaeontological Component in a Heritage Impact Assessment Report, must also be undertaken by a suitably qualified palaeontologist. <p>The only independent heritage specialist report that was submitted to the case was the Archaeological Impact Assessment.</p>		<p>Tourism Impact: Tourism Impacts have been assessed as part of the Social Impact Assessment.</p> <p>The Surface Infrastructure is only located on the farm Ketting and Goedetrouw. There is no anticipated impact on rock art sites located in and around the escarpment.</p> <p>A palaeontological assessment has been completed and is included as Appendix 7-5</p>
29.	<p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit cannot accept the HIA report submitted to the case in support of this EA application due to the following:</p> <ul style="list-style-type: none"> • The HIA does not assess all types of heritage as per section 38(3)a of the NHRA; • The SAHRA issued an Interim Comment dated 18/10/2019, where SAHRA requested several heritage studies that should form part of the HIA. This has not been complied with; • The HIA submitted to the case only contains an Archaeological Impact Assessment. • Therefore, SAHRA requires that the HIA is amended to include all the specialist studies requested in the Interim Comment issued on the 18/10/2019. The Palaeontological Impact Assessment and cultural landscape assessment must be undertaken by suitably qualified palaeontologist and heritage built environment specialist/architectural historian respectively. An assessment of the potential impacts to existing research and tourism in the Makgabeng due to the establishment of the mine must be included in the HIA; • The reports of the assessment must be submitted to SAHRA, as well as included in the HIA. The HIA has to combine the impact assessment results for the various heritage studies as per section 38(3). • All the specialists who contributed to the HIA must also sign a declaration of independence and include it in the individual reports. • The HIA report must be submitted to SAHRA as part of the EA application and before final submission to the competent authority. 	<p>Nokukhanya Khumalo Heritage Officer South African Heritage Resource Agency Written comment 7 August 2019</p> <p>EIA Phase</p>	<p>We take note of your comments and would like to arrange a meeting to discuss the mine development, the expected impacts and clarify any further work that would be required.</p> <p>Also see comments above</p>

INTEGRATED HERITAGE ASSESSMENT - COMMENTS AND RESPONSE REPORT: WATERBERG JV RESOURCES – WATERBERG PLATINUM MINE PROJECT

NO	COMMENT	STAKEHOLDER	RESPONSE
	Should you have any further queries, please contact the designated official using the case number quoted above in the case header.		
30.	Following a meeting held with the EAP, the Heritage Specialist and the SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit, the SAHRA APM Unit notes that the integrated HIA, that takes into account the SAHRA requirements mentioned in previous Interim Comments, will be submitted to SAHRA for consideration as part of the current EA application. It is also understood that an extension of the EA application process will be made to the competent authority in order to accommodate the necessary studies. Given the above conditions, the SAHRA will provide further comments on the case once the amended HIA report is submitted to the case.	South African Heritage Resources Agency 16 September 2019	Waterberg JvCo has met with SAHRA in respect of additional studies required relating to any potential impacts that mining may have on rock art sites. The following was agreed: <ul style="list-style-type: none"> • an overarching / integrated Heritage Impact Assessment will be conducted, which will source information from various existing specialist studies such as the Air Quality Impact Assessment, Blasting Impact Assessment, Social Impact Assessment, Archeological Impact Assessment and Palaeontological Impact Assessment; • due to point data of existing rock-art and other heritage sensitive sites within the broader area is not available, it was agreed that a Heritage Sensitive area would be utilised and the methodology of determining this area will be clearly described in the report above; • additional assessment of potential blasting impacts on sensitive heritage areas will be included in the above mentioned report; • additional assessment of potential tourism impacts will be included in the above mentioned report; and • the applicant will make the DMR aware of the outstanding matters in terms of SAHRA's comments