



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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CaseID: 12878

Date: Thursday October 04, 2018

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Interim Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Waterberg JV Resources (Pty) Ltd

1st Floor, Platinum House
24 Sturdee Avenue
Rosebank, Johannesburg
2196

Waterberg JV Resources (Pty) Ltd holds various prospecting rights for platinum group metals and other minerals. Applications has been made for a Mining Right , Environmental Authorisation, Waste Management License and Water Use License Application in due course. The Project area is located 13km west of Senwabarwana, 74km north-west of Polokwane, 63km south of All Days and 83km west of Louis Trichardt, within the Blouberg Local Municipal area, Capricorn District. The properties include Rosamund 357 LR, Disseldorp 369 LR, Millstream 358 LR, Ketting 368 LR, Portion 1 of Goedetrouw 366 LR, Goedetrouw 366 LR, Early Dawn 361 LR, Old Langsine 360 LR, Langbryde 324 LR Lomondside 323 LR, Portion 1 of Norma 365 LR, Remaining Extent of Norma 365 LR and Portion 10, 12, 13 & 14 of Harriets Wish 393 LR.

Waterberg JV Resources (Pty) Ltd are proposing to establish a new Platinum Group Metal (PGM) Mine in Makgabeng Plateau of the Blouberg Local Municipality in the Limpopo Province.

The mine right area will be 20 482 ha in extent, using underground mining methods to mine out palladium and rhodium ore from depths of 170 and 350 down, with the ore body proposed to be 2.5m in depth. The affected farms will be Rosamond 357 LR; Millstream 358 LR; Disseldorp 369 LR; Ketting 368 LR; Goedetrouw 366 LR; Early Dawn 361 LR; Old Langsine 360 LR; Langbryde 324 LR; Lomondside 323 LR; Portions 10, 12, 13, 14 of Harriets Wish 393 LR. Surface infrastructure will be 630 ha in extent located on the farm Ketting 368 LR with the TSF's (409 ha in extent) Alternatives on Portion 1 and remainder of Norma 365 LR, and the construction camp on Harriets Wish 393 LR. Infrastructure to be constructed will consist of the Northern WRD (55 ha); TSF; Vent Fans, Tailings Pipeline, Return Water Pipeline, Service Road all 7.8 ha; Magazine (3 460 m²); Helipad; Telecommunications Tower; Three Pollution Control Dams; Return Water Dam; Balancing Dam; and Access Road (55 743 m²).

Bataleur Environment Consultants (Pty) Ltd is undertaking a Scoping and Environmental Impact Assessment



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(S&EIA) process on behalf of Waterberg JV Resources (Pty) Ltd, in respect of listed activities in the EIA Regulations 2017, that require an application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (NEMA), a Water Use License in terms of the Water Use Licence Regulations, March 2017 in terms of the National Water Act, 36 of 1998 and a mine right in terms of section 22 of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As amended). A Public Participation Notice and Scoping Report has been submitted to SAHRA in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999 for commenting.

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.

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

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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:

- An assessment of the Historical Built Environment and a cultural landscape assessment must be



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- 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.

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.

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).

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.

SAHRA will comment further on this proposed development once the requested reports are submitted to the

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case.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/511704>
(, Ref: LP 30/5/1/2/2/10161MR)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.