



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 12878

Date: Monday September 16, 2019

Page No: 1

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.

Platinum Group Metals (Pty) Ltd Waterberg JVC Resources are proposing to convert their existing prospecting rights into a new order Mine Right, to establish an underground mine to mine PGM group metals. The application area is 20 482 ha, located in the Blouberg Local Municipality of the Limpopo Province. The proposed surface infrastructure will be located on Portion 1 of the Goedetrouw and Goedetrouw and alternative 1 will be located on the farm Ketting. The TSF alternative 1 is proposed at the farm Ketting and Disseldorp, alternative 2 is proposed on Portion 1 and remainder of the farm Norma.

Bataleur Environment Consultants (Pty) Ltd have submitted a draft Environmental Impact Assessment report (EIAR) on behalf of the applicant, Platinum Group Metals (Pty) Ltd Waterberg JVC Resources, in support of an integrated Environmental Authorisation application in terms of the National Environmental Management Act, 1998 (NEMA) and the NEMA 2017 EIA Regulations. That includes a Water Use License in terms of the Water Use Licence Regulations, March 2017, 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 Heritage Impact Assessment (HIA) report by A. Pelsler Archaeological Consulting (APAC) and an additional



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

AIA for prospecting activities was been submitted to SAHRA for commenting in terms of section 38(8) of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

Van Vollenhoven, A.C. March 2019 and April 2019. A report on an Additional Cultural Heritage Impact Assessment done for the Platinum Group Metals Waterberg Prospecting area, Limpopo Province.

The author undertook a field assessment to identify heritage resources within the proposed mine right area. The field survey identified 46 heritage sites of medium heritage significance, located within the proposed mine right area. Of the 46 identified sites, 30 of them were identified on the farms Ketting and Disseldorp. The author recommends mitigation of the sites located on the farms that will need to be mitigated due to impacts from the proposed mine surface infrastructure. Then a Heritage Site Management Plan must be developed for long term monitoring of the remaining sites in the mine right area.

The South African Heritage Resources Agency (SAHRA) issued an Interim Comment dated 04/10/2018, and a second Interim Comment dated 07/08/2019, whereby SAHRA requested an integrated HIA report to be submitted to the case as part of the EIA application process. Subsequently the EIA specialist studies have been submitted to the case along with a palaeontological desktop study by Dr H. Fourie.

Fourie, H. July 2019. Waterberg Project Blouberg Local Municipality, Capricorn District Municipality, Limpopo Province. Farm: Rosamund 357-LR, Disseldorp 369-LR, Millstream 358-LR, Ketting 368-LR, Portion 1 Goedetrouw 366-LR, Goedetrouw 366-LR, Early Dawn 361-JR, Old Langsine 360-LR, Langbryde 324-LR, and Lomondside 323-LR. Palaeontological Impact Assessment: Desktop Study.

The author analysed the available geological literature of the area and assessed that the study area is underlain by sedimentary rocks of the Makgabeng Formation, Matlabas Subgroup of the Waterberg group, Karoo Supergroup, and by Quaternary aged sediments of low and moderate palaeontological sensitivity respectively. Underlying these formations is the Bushveld Igneous Complex, the will be mined. The author recommended the following:

1. Mitigation may be needed (Appendix 2) if fossils are found.
2. No consultation with parties was necessary. The Environmental Control Officer must familiarise him-or-herself with the formation present and its fossils and obtain training pre-construction (one day).
3. The development may go ahead.
4. The EMPr already covers the conservation of heritage and palaeontological material that may be exposed

Our Ref: 12878



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 12878

Date: Monday September 16, 2019

Page No: 3

during construction activities. For a chance fossil find, the protocol is to immediately cease all construction activities, construct a 30 m no-go barrier, and contact SAHRA for further investigation. It is recommended that the EMPr be updated to include the involvement of a palaeontologist (pre-construction training of ECO) and the ECO together with the mine geologist must visit and survey the site after blasting and excavating, alternatively visit the site once a month.

Interim Comment

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.

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

Our Ref: 12878



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Nokukhanya Khumalo
Tel: 021 462 4502
Email: nkhumalo@sahra.org.za
CaseID: 12878

Date: Monday September 16, 2019
Page No: 4

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)