



an agency of the
Department of Arts and Culture

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CaseID: 12878

Date: Friday May 08, 2020

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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.

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



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section 22 of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As amended).

A Heritage Impact Assessment (HIA) report by and an additional AIA for prospecting activities, and a desktop Palaeontological Impact Assessment (PIA) were been submitted to SAHRA for commenting in terms of section 38(8) of the National Heritage Resources Act, no. 25 of 1999 (NHRA). SAHRA last issued an Interim Comment dated 16/09/2019, requesting a complete HIA in terms of section 38(3) that assesses all potential impacts to the significant Makgabeng Plateau. An integrated HIA has since been submitted along with all heritage related comments and responses report.

Van Vollenhoven, A.C., Pretorius, G., Eksteen, and M. Dickson, L. February 2020. Waterberg JV Mine Integrated Cultural and Heritage Impact Assessment.

The author assessed the conclusions provided in the Air Quality, Blasting and Visual Impact assessment reports and included in the integrated report. The proposed surface infrastructure will not impact on all identified heritage resources in the low-lying areas. No infrastructure is planned in the high lying areas on the farms Early Dawn, Disseldorp and on the Makgabeng Plateau (Old Langsyne, Langbyrde, Rosamund, Disseldorp, Ketting and Millstream), within the current proposed mine right area. The visual impact on the sites on the plateau is negligible.

The author recommends the following:

A buffer zone of 20 metres around the identified burial grounds and graves as well as the historical sites and the three archaeological sites.

All burial grounds and graves must be fenced in and with an access gate for families to gain access to.

A burial grounds and graves specific management plan must be developed for the long term management of graves in the mine right area.

An archaeologist must be appointed to draw up a comprehensive Heritage Management Plan with a monitoring programme. The monitoring programme must include monitoring of all activities by an archaeologist in the construction phase.

The management plan must also include the monitoring of potential impacts of mining activities on the Makgabeng Plateau.

The Comments and Response Report notes that the communities are not in favour of the relocation of graves and that the mine must respect their culture.

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SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes all the studies undertaken for this project, and the heritage specific comments and responses report. However, SAHRA requires that the EAP submits all proof of correspondence with the Rock Art Research Institute, or any attempts made to reach them for comment in this application process.

It should be noted that SAHRA has since received a nomination from the Rock Art Research Institute to declare Makgabeng Plateau as a Nation Heritage Site. The nomination will include but not limited to the following farms:

Rosamund 357 LR

Disseldorp 369 LR

Millstream 358 LR

Ketting 368 LR

Early Dawn 361 LR

Old Langsine 360 LR

Langbryde 324 LR

Lomonside 323 LR

Formal communication will be circulated to the mine in due course.

SAHRA will comment further once the above requested information is uploaded to the case.

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

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above in the case header.

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
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)