



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: 15643

Date: Wednesday March 24, 2021
Page No: 1

Final Comment

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

Attention: Imvubu Berries

Imvubu Berries (Pty) Ltd (the applicant) appointed Setala Environmental (Pty) Ltd as the independent environmental assessment practitioner (EAP) to undertake the Environmental Impact Assessment (EIA) for the proposed project. The project involves the upgrade of existing in-channel farm dams and the construction of a new off-channel farm dam for the existing lawful water use(s): Surface water abstraction and storage; and for the abstraction of groundwater at Elandsbosch 122-KR for domestic purposes. The scope of the project includes application for environmental authorisation and a water use licence for the use of water for irrigation purposes.

Setala Environmental (Pty) Ltd has been appointed by Imvubu Berries (Pty) Ltd to undertake an environmental assessment as part of a Basic Assessment application process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations.

Imvubu Berries (Pty) Ltd is proposing to upgrade existing dams on the farm located Elandsbosch 122 KR, in the Lephalalae Local Municipality of Limpopo Province, and to construct a new dam.

The area is of moderate palaeontological significance according to the SAHRIS palaeomap, and as per the policy, a desktop assessment of palaeontological resources are required.

Archaetnos Culture and Cultural Resources Consultants cc has submitted a Letter of Recommendation for an Exemption from undertaking a Heritage Impact Assessment to SAHRA for commenting.

Van Vollenhoven, A.C. October 2020. LETTER FOR HIA EXEMPTION REQUEST: IMVUBU BERRIES, MODIMOLLE-MOOKGOPONG LOCAL MUNICIPALITY, LIMPOPO PROVINCE.

Assessed the proposed developments and the known heritage and history of the area, and determines that there will be no impact to any heritage resources by the proposed development activities.

The SAHRA issued an Interim Comment dated 27 November 2020 requesting an assessment of impacts to

Our Ref: 15643



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: 15643

Date: Wednesday March 24, 2021

Page No: 2

palaeontological resources by a suitably qualified palaeontologist. The Palaeontological Impact Assessment was submitted to SAHRA on 23 February 2021.

Bamford, M. February 2021. Palaeontological Impact Assessment for the proposed three dam project on Portions 6 and 8, Elandsbosch 122 KR, Naboomspruit for Imvubu Berries, Limpopo Province.

The area is underlain by arenites, sandstones and rudites of the Mogalakwena Formation, Kransberg Subgroup, Waterberg Group, Transvaal Supergroup. These coarse grained sediments are indicative of high energy riverine environment that is not suitable for fossil preservation and therefore has *low* palaeontological significance. Fossilised microbial mats would occur in low energy riverine areas common to the underlying Makgabeng Formation. The author provides no further mitigation measures.

Final Comment

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA and the PIA reports submitted to the case for commenting, and has no objection to the development going ahead on the following conditions.

In the event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.

If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8654).

The Burial Grounds and Graves (BGG) Unit accepts the recommendations provided in the HIA report. If the mine is unable to retain site BGG-001 in situ then a social consultation process in terms of Chapter XI of the NHRA Regulations, must be carried out to identify the descendants of the burials in the cemetery. If the

Our Ref: 15643



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: 15643

Date: Wednesday March 24, 2021

Page No: 3

families of the deceased agree to a grave relocation then a section 34 of the NHRA permit application must be logged on SAHRIS.

If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves, then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivase/Mimi Seetelo 072 802 1251).

The Final BAR and its appendices must be submitted to the case and once a Record of Decision from the competent authority is issued, it must also be 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

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

ADMIN:

Our Ref: 15643



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: 15643

Date: Wednesday March 24, 2021

Page No: 4

Direct URL to case: <https://sahris.sahra.org.za/node/542134>

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.