

# ESTABLISHMENT OF TWO ADDITIONAL VENTILATION SHAFTS, ASSOCIATED INFRASTRUCTURE UPGRADES AND CHANGES TO THE APPROVED SURFACE INFRASTRUCTURE

Our Ref: 15966



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

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CaseID: 15966

Date: Tuesday February 08, 2022

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## Interim Comment

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

Attention: Impala Platinum Limited

PO Box 5683  
RUSTENBURG  
0300

### **Marula Platinum (Pty) Ltd is proposing the establishment of two additional ventilation shafts, associated infrastructure upgrades and changes to the approved surface infrastructure layout at the Marula Platinum (Pty) Ltd mine on the farms Clapham, Winnarshoek and Driekop (Limpopo province)**

Marula Platinum (Pty) Ltd received their mining right in 2001 and are now proposing to amend their mine right in order to construct two additional ventilation shafts for the underground mine as well as amendments to the existing infrastructure at the approved ventilation shaft and additional water pipelines and power lines to the ventilation shafts. The mine is also proposing to establish an additional stockpile area, and make upgrades to the existing TSF plume. The ventilation shafts will be constructed on the farm Winnarshoek 250 KT and Clapham 118 KT, Greater Tubatse Local Municipality of Limpopo Province.

Diphororo Developments (Pty) Ltd have been appointed to undertake an environmental assessment as part of the Scoping and Environmental Impact Reporting 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. As well as an Environmental Management Plan as per the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

A Background Information Document (BID) was submitted to the South African Heritage Resources Agency (SAHRA) for commenting in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). The SAHRA issued an Interim Comment dated 26/02/2021 requesting the assessment of impacts on heritage and palaeontological resources in accordance with section 38(3) of the NHRA by experienced and qualified archaeologist and palaeontologist.

A second BID has been submitted to the case for the construction of two additional ventilation shafts, upgrade of existing water infrastructure and pipeline to the approved TSF, new change house, stockpile area and

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tailings dam. No other studies as requested were included.

## Interim Comment

As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA) (As amended), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the NEMA EIA Regulations.

The archaeological component of the HIA should follow the SAHRA 2007 Minimum Standards: Archaeological Component of Impact Assessment Report. The quickest process to follow for the archaeological component would be to contract a qualified archaeologist (see [www.asapa.co.za](http://www.asapa.co.za) or [www.aphp.org.za](http://www.aphp.org.za)). The Minimum Standards refers to a Letter of Recommendation for Exemption from further studies, that may be submitted should the archaeologist deem it appropriate.

The proposed development area is located within an area of low and very low sensitivity in terms of palaeontological resources as per the SAHRIS PalaeoSensitivity map. As such, a Fossil Finds Procedure must be drafted by a qualified palaeontologist (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The procedure or letter of exemption must be included in the HIA report and the EMP. Please also ensure that the appointed palaeontologists declaration of interest is accompanies the letter.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

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Further comments will be issued upon receipt of the aforementioned specialist study.

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

Yours faithfully

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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/552405>  
(, Ref: )