

Our Ref: 16609



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: 16609

Date: Wednesday September 08, 2021  
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## Final Comment

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

Attention: PalRho Exploration (Pty) Ltd

**PalRho Exploration (Pty) Ltd, a subsidiary of Ivanhoe Mines Ltd, intends to obtain a Prospecting Right (PR) and undertake prospecting activities on three adjacent properties near Mokopane in the Limpopo Province. This process is applicable to the PR application on the farm Lisbon 288 KR. The application includes several portions of the farm comprising 2 543 hectares. PalRho will use invasive and non-invasive prospecting methods. The invasive prospecting methods will include drilling approximately 10 cores.**

PalRho (Pty) Ltd a subsidiary of Ivanhoe Mines (Pty) Ltd have appointed Digby Wells Environmental (Pty) Ltd to undertake a Basic Assessment application process in support for an Environmental Authorisation (EA) in terms of the National Environmental Management Act, Act no 107 of 1998 (NEMA) as amended, for activities that trigger the NEMA Environmental Impact Assessment (EIA) 2014 Regulations, as amended. As well as the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

PalRho are also proposing to prospect for Platinum Group Metals (PGMs) on the farm Lisbon 288 KR, Mogalakwena Local Municipalities of Limpopo Province. The prospecting programme will include invasive activities with 10 boreholes locations identified as part of the programme, and each borehole requires land clearance of 20 by 25m.

This case is linked to case ID 16608: <https://sahris.sahra.org.za/cases/pal6882-prospecting-right-application-...>

A Heritage Impact Assessment (HIA) by Digby Wells Environmental (Pty) Ltd has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

*Hardwick, S. May 2021. Environmental Authorisation Process for the Lisbon Prospecting Right Application Heritage Basic Assessment Report.*

The study area is underlain by sedimentary rocks of the Chuniespoort Group, Waterberg Group, and Pretoria Group (Transvaal Supergroup), and igneous rocks of the Northern limb of the Bushveld Complex. The former



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two groups have a very high palaeo sensitivity for the Malmani Subgroup, Chuniespoort Group, and the Makgabeng Formation, Waterberg Group are known to contain stromatolites and organic-walled microfossils representing the oldest fossil evidence of cyanobacteria. The later is intrusive igneous rocks that have no palaeontological potential. The site specific study area has negligible, high and moderate palaeo sensitivity and is located in a grey, orange and green zones on the SAHRIS palaeomap.

The heritage specialist were unable to undertake a field survey of the prospecting area as such a desktop study was undertaken. From the study, the author found a potential 56 heritage receptors that may be of heritage significance in the general region and recommends a field survey to identify if there are any heritage resources in the study area.

*Hardwick, S. and Nel, J. May 2021. Environmental Authorisation Process for the Lisbon Prospecting Right Application Heritage Basic Assessment Report Addendum.*

The author undertook a predisturbance survey and did not identify any heritage resources that may be impacted by the proposed development activities. The author recommends chance finds procedures during ground clearance of the drilling pads.

### **Final Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the HBAR and the heritage addendum report. The SAHRA has no objection to the development going ahead on the following conditions:

If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Officer (EO) in charge of these developments must be informed. These discoveries ought to be protected and the ECO must report to SAHRA.

A Chance Finds Fossil Procedures must be developed by a palaeontologist and it must be included in the EMPr.

The ECO, mine manager and mine workers must obtain training in identifying fossils that may occur in the region.

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

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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).

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 012 320 8490).

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

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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

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**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/575471>  
(DMR, Ref: )

**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.