



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: 20075

Date: Tuesday December 20, 2022

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Final Comment

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

Attention: Ivanplats (Pty) Ltd

HERITAGE ASPECTS ON PORTIONS OF TURFSPRUIT 241 KR FOR THE DEVELOPMENT OF THE IVANPLATS PLATREEF SOLAR PROJECT, THE WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE

Ivanplats (Pty) Ltd's Platreef Mine is proposing to reduce their carbon footprint and construct a Solar PV facility. The development will be undertaken in a phased approach, commencing with the initial phase yielding a 3MW power supply from Area 2 and 2MW power supply from Area 3. In total these areas can yield up to 7MW of electricity supply. Area 3 has been identified as a parking area and will have solar panels mounted on the roof of the carports. Area 2 will comprise of fixed structures anchored to the ground and mounted with the latest N-type TopCON, bi-facial, double glass solar modules. The entire solar facility will supply up to 19MW of electricity for private consumption at the mine operations. In total, the solar PV facility will encompass an area of 19.59 hectares.

OMI Solutions (Pty) Ltd has been appointed by Platreef Mine to undertake an environmental assessment 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.

The Final BAR, and Heritage Impact Assessment (HIA) by have been submitted to SAHRA in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999 for commenting.

Kruger, N. August 2022. MEMORANDUM IN TERMS OF HERITAGE ASPECTS ON PORTIONS OF TURFSPRUIT 241 KR FOR THE DEVELOPMENT OF THE IVANPLATS PLATREEF SOLAR PROJECT, THE WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE.

The mine right area has been subjected to many Heritage Impact Assessments, this statement summarises the findings of the various assessments in the area proposed for the Solar PV project. There were 10 sites that were identified for further investigation for potential graves. Further investigation took place and sites where graves were positively identified, they were relocated and sites where no graves were identified, they were noted down. There was one site where it was inconclusive (Site 012A_05) and still requires additional



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investigation, and another site mentioned in the later GPR study by PGS (PLR70) that did not indicate a burial ground. The author recommends the following:

- Site 012A_05 must be investigated further to determine if there is a burial or not.
- An archaeologist must be appointed to undertake a watching brief during ground clearance activities to monitor if any heritage resources are uncovered during construction.
- The relevant families must be informed of the proposed development.
- Any grave relocations must be undertaken by a qualified archaeologist and
- Any palaeontological and archaeological material uncovered during construction must be kept in situ and the ECO must be informed of the findings.

The area has negligible sensitivity and there SAHRIS palaeomap policy exempts the development from undertaking a palaeontological impact assessment.

Final Comment

The SAHRA Archaeology, Palaeontology, and Meteorites (APM) Unit notes and accepts the submission of the Final BAR, and HIA reports. SAHRA has no objections to the proposed development on the following conditions:

38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit and the Burial Grounds and Graves (BGG) Unit has no objections to the proposed development;

38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. These further additional comments apply:

An archaeologist must be appointed to undertake a watching brief during ground clearance activities to monitor if any heritage resources are uncovered during construction.

BGG Comments:

Site 012A_05 must be investigated further to determine if there is a burial or not.

Due to historical issues we have encountered with the Ivanplats community, we fully support the proposal for further investigations to confirm/ rule out the existence of graves at the site in question.

A section 35 of the NHRA permit application in terms of Chapter IV of the NHRA 2000 Regulations must be applied for any test excavations for further investigation activities that involve test excavations.

A section 36 of the NHRA permit application in terms of Chapter XI of the NHRA 2000 Regulations must be applied for by a suitably qualified archaeologist if a grave is confirmed at the site.

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The relevant families must be informed of the proposed development prior to the commencement of construction activities.

Any grave relocations must be undertaken by a qualified archaeologist

38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Nokukhanya Khumalo/Phillip Hine 021 202 8654) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqalabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

38(4)d – See section 51(1) of the NHRA;

38(4)e – The following conditions apply with regards to the appointment of specialists:

i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

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South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/608794>

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.