



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto: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](http://www.sahra.org.za)

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)

CaseID: 20490

Date: Wednesday February 15, 2023

Page No: 1

## Final Comment

### In terms of Section 38(2) 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 submitted an application to the Department of Mineral Resources and Energy (DMRE) for the amendment of its Mining Right in terms of Section 102 of the Mineral and Petroleum Resources Development Act (MPRDA). The Section 102 triggers an amendment of the Environmental Authorisation in terms of the 2014 EIA Regulations, as amended. The amendment entails the extension of the Mining Right Area with the inclusion of two additional farms, namely Bonne Esperance 356 LR and Too Late 359 LR, which is located to the north west of the existing Mining Right as indicated in the figure below. It amendment application does not include any additional infrastructure and/or disturbances on the two farms.**

Bateleur Environmental and Monitoring Services has been appointed by Waterberg JVC Resources (Pty) Ltd, to undertake an EMPr amendment application. It is noted that this is a non substantive application.

The draft BAR and EMPr have been submitted to SAHRA in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999 for commenting. This amendment application relates to the initial Mining Right application on SAHRIS case ID

12878, <https://sahris.sahra.org.za/cases/waterberg-platinum-mine-mining-right-a...>

### Final Comment

The SAHRA Development Applications Unit (DAU) notes the submission of the draft BAR and EMPr reports however, as there has been no assessment of impacts to the heritage landscape by mining and blasting activities on heritage resources/sites sensitive to these activities located on the farms Bonne Esperance 356 LR and Too Late 359 LR, the SAHRA cannot make an informed decision on this application. There is still the risk of subsidence, vibrations and blasting on highly significant surface heritage resources.

Our Ref: 20490



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto: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](http://www.sahra.org.za)

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)

CaseID: 20490

Date: Wednesday February 15, 2023

Page No: 2

Due to the very sensitive nature of the Makgabeng Plateau, an assessment of impacts to heritage and palaeontology must be undertaken by the relevant heritage and palaeontological specialists as part of the Amendment Application. All heritage assessments (a total of 4) for the original Mine Right Application (Case ID 12878) did not assess the farms Too Late 359 LR and Bonne Esperance 356 LR and as such the significance ratings provided in the EMPr is based off of insufficient information. The application for non substantive amendment is recommended to be reconsidered due to the lack of previous assessment on heritage resources on the affected properties. Rather that a section 32 amendment application process be undertaken.

Therefore, the SAHRA objects to this proposed development and advises the Department of Mineral Resources and Energy (DMRE) to reject the amendment application for the extension of the Mining Right Area with the inclusion of two additional farms, namely Bonne Esperance 356 LR and Too Late 359 LR (LP30/5/1/2/2/10161MR) as the impact to heritage resources as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the NHRA has not been conducted as part of the EA process.

This comment must be forwarded directly to the competent authorities and proof of the submission and receipt thereof must be provided to SAHRA.

It should be noted that the Heritage Management Plan has not been submitted to SAHRA as per the EA granted to the mine under condition 8.

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



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto: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](http://www.sahra.org.za)

Enquiries: Nokukhanya Khumalo  
Tel: 021 462 4502  
Email: [nkhumalo@sahra.org.za](mailto:nkhumalo@sahra.org.za)  
CaseID: 20490

Date: Wednesday February 15, 2023  
Page No: 3

---

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

---

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/611802>  
(, Ref: LP30/5/1/2/2/10161MR)

**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.