

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 18998

Date: Wednesday August 03, 2022

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Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Glencore Operations South Africa (Ptd) Ltd

The applicant wishes to develop a Solar Photovoltaic (PV) Energy Generation Facility at the Rhovan Vanadium Mine. The generation capacity will be 25 megawatts (MW). The Project is located in North West, South Africa

Environmental Impact Management Services (EIMS) has been appointed by Glencore (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed development of a Solar PV Energy Generation Facility at the Rhovan Vanadium Mine (within the mining right boundary) on Portion 0 of the Farm Leeuwpen 403 JQ, Portion 0 of the Farm Beestkraal 397 JQ and RE of Portion 2 of the Farm Losperfontein 405 JQ within the Rustenburg Local Municipality, Bojanala Platinum District, North West Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will entail the construction of a 25 MW PV facility with associated infrastructure which will include a 11kV power line, access roads, vegetation clearance.

The application relates to the following previous application for the Rhovan Vanadium Operations on SAHRIS (<https://sahris.sahra.org.za/cases/glencore-operations-south-africa-pty-l...> and <https://sahris.sahra.org.za/cases/rhovan-mine-back-filling-opencast-pits...>). The original application which the revised HIA was submitted for in 2005/6 was not located on SAHRIS.

Dr. Julius CC Pistorius has been appointed to provide heritage specialist input as part of the EIA process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Pistorius, J. An Updated Phase 1 Heritage Impact Assessment (HIA) Study for Rhovan Operations in the Central Bankeveld of the North-West Province of South Africa.

This Phase 1 Heritage Impact Assessment study was conducted in September 2013 for Rhovan Operations in order to update the earliest Phase 1 Heritage Impact Assessment study which was done for Xstrata Alloys



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Rhovon Vanadium Mine in 2005. Heritage resources identified in the 2005 assessment were revisited, documented and re-assessed as part of the 2013 survey. The 2013 survey identified an additional site and this site was added to the list of sites within the Rhovan Mining Operations area. In total seven sites were identified in the Rhovan Mining Operations area, all of which are described as archaeological sites relating to the Late Iron Age, although some doubts exist about site MIA/LIA03 which may have dated to the Middle Iron Age.

During the earliest survey it was reported that Site MIA/LIA01, Site MIA/LIA02 and Site MIA/LIA03 may have dated to the Middle Iron Age. However, this updated report which entailed a more thorough investigation of the archaeological sites has confirmed that the first two sites date from the Late Iron Age. It is therefore possible that Site MIA/LIA03 may also have dated from the LIA although no stone walls were found in association with this site.

Sites **LIA01**, Site **LIA02**, and Site **LIA05** have High significance as the first two sites are clearly associated with specialist metal working such as possible iron smelting and even with the forging of iron. Site **LIA05** was either part of a large village or may have served as a cattle station where large numbers of cattle were kept. These sites are located on the western perimeter of the Rhovan mining area. The location of these sites mean that it is not expected that they may be affected or impacted by expanding mining activities in the near future.

Sites **LIA06** and Site **LIA07** have little significance as these sites are simple in appearance whilst site **LIA07** also has been affected by development activities in the past. Site **MIA/LIA03** has been destroyed when the wall of an open pit collapsed. These sites occur in the immediate proximity where Rhovan is focusing some of their mining activities. These sites therefore may be affected by mining activities in the short, medium or long term.

The specialist has recommended the following:

- Sites **LIA01**, **LIA02** and **LIA05** are classified as significant it is recommended that the sites be conserved. However, if these sites are inevitably being threatened by expanding mining activities it is recommended that these sites are subjected to a Phase 2 investigation prior to them being affected by the expanding mining activities.

Sites **LIA04**, **LIA06** and **LIA07** are considered to be of Low significance these sites can be destroyed by future mining activities as they have been adequately described and documented in this report.

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Sites LIA01, Site LIA02 and LIA05 will not be affected by expanding mining activities during the short term. Consequently, these sites have to be monitored every six months to determine the state of preservation (condition) of these sites.

The Rhovan mine operations are located in an area of insignificant Palaeontological Sensitivity according to the PalaeoSensitivity Map on SAHRIS.

Interim Comment

The SAHRA's APM Unit acknowledges receipt of the DSR and the attached specialist heritage report as well as the recommendation contained therein. SAHRA has noticed that the submitted HIA reported was initially conducted in 2005 and updated in 2013. The 2005/6 report was submitted for a Rhovan mine back-filling application in 2019 (<https://sahris.sahra.org.za/cases/rhovan-mine-back-filling-opencast-pits...>) which was left in DRAFT and SAHRA never provided comments on.

As the submitted HIA report is almost 10 years old and it is noted that Site MIA/LIA03 was destroyed by mining activities it is clear that site conditions have changed and the threat to heritage is high. SAHRA request that the applicant undertakes a new field-assessment to assess the impact of the proposed Solar Energy Generation Facility at the Rhovan mining Operations as the submitted report was conducted for Mining activities and not the proposed solar projects. As such a project specific field-based HIA is required.

As the proposed development is located in an area of insignificant palaeontological significance no further assessment of the impact to palaeontological resources is required.

Further comments will be issued upon receipt of the above requested report and the submission of the draft EIA with appendices.

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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Elijah Dumisani Katsetse
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahr.is.sahra.org.za/node/600513>