



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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Tel: (063) 894-1979  
Email: [jpakwe@sahra.org.za](mailto:jpakwe@sahra.org.za)  
Case ID: 25352

Date: Monday, 14 July, 2025

### Final Comment

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

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39 Melrose Boulevard  
Birnam  
Johannesburg  
2076

WSP Group Africa (Pty) Ltd was appointed by Glencore Operations South Africa (Pty) (GOSA) Ltd to undertake an Environmental Authorisation (EA) for the proposed Lakenvlei Wetland Rehabilitation Project-Phase 2 on Portions 7,18 and 19 of Farm Middlepunt 320 JT, Portion 7 of Farm Zwartkoppies 316 JT and Portions 2, 4 and 6 of farm Lakenvlei 355 JT within the eMakhazeni Local Municipality, Mpumalanga Province.

A draft Basic Assessment Report (dBAR) was submitted in terms of the National Environmental Management Act, Act No. 107 of 1998 (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 as amended. The application is to satisfy a condition imposed onto GOSA for the issued WUL license (Ref: 24084063 issued on 19 April 2007), a condition to rehabilitate a wetland at the existing and authorised GGV. The application is, therefore, the maintenance of existing wetland rehabilitation structures, repairing and formalisation of damaged spillways, stabilising head cuts and repairing a dam wall and the formalisation of the existing wetland crossing/access route.

Dr. Heidie Fourie and Apelser Archaeological Consulting cc were appointed to undertake specialist Palaeontological and Heritage Impact Assessments for input in the EIA process in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act No. 25 of 1999 (NHRA).

Fourie, H., 2025. Glencore Lakenvlei WULA BAR, eMakhazeni Local Municipality, Nkangala District Municipality, Mpumalanga Province, Palaeontological Impact Assessment: Phase 1: Field Study.

The proposed development footprint is underlain by the Pretoria Group of the Transvaal Supergroup. No fossil heritage resources were identified during the field study.

*Pelser, A., 2025. A Phase 1 Heritage Desktop Report & Impact Assessment for the Proposed Lakenvlei*



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*Wetland Rehabilitation Project – Phase 2 (Proposed Lakenvlei Wetland Rehabilitation Project – Phase 2 Between Belfast & Dullstroom, Wards 4&6 of Emakhazeni Local Municipality, Nkangala District Municipality, Mpumalanga Province.*

No significant heritage resources were identified in the desktop study and given the nature of the project area, no heritage resources can be expected to be found.

Recommendations made by the specialist report:

- Chance Finds Protocols must be implemented as proposed in the reports.

### Final Comment:

**The following comments are made as requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the final EIA and EMP**

- 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to;
- 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 DAU (John Pakwe 0638941979 / [jpakwe@sahra.org.za](mailto:jpakwe@sahra.org.za)) must be alerted as per section 35(3) of the NHRA. Non-compliance with this 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 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists: 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.



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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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John Pakwe  
Heritage Officer: Development Applications Unit  
South African Heritage Resources Agency

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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

**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.

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**ADMIN:**

Direct URL to case: <https://sahris.org.za/node/382215>