



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Nokusho Ngobeni
Tel:
Email: nngobeni@sahra.org.za
Case ID: 25573

Date: Monday, 21 July, 2025

Final Comment

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)/In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Tintswalo Kanyongolo
Two Rivers Platinum Mine
Two Rivers Platinum Mine
Dwarsrivier Farm 372KT
Steelpoort
1133

Interdesign Landscape Architects was appointed by Two Rivers Platinum Mine to undertake a Basic Assessment (BA) process for the proposed development of a cemetery site on Portion 6 of the Farm Dwarsrivier 372 kt, within Fetakgomo - Tubatse Local Municipality, Limpopo Province.

A Draft Basic Assessment Report (DBAR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the Environmental Impact Assessment Regulations, 2014 as amended (EIA). The applicant proposes the relocation and reburial of human remains to a newly identified site located within Portion 6 of the Farm Dwarsrivier 372 KT. the total application area encompasses approximately 1 hectare.

(AHSA) Archaeological and Heritage Services Africa (Pty) Ltd has been appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Matenga, E. 2014. Heritage Impact Assessment for New Burial Ground at Two Rivers Platinum Mine

The author undertook a field assessment, and nine sites were recorded all of which are of low cultural significance.

Recommendation

Monitoring during excavations. If archaeological or other heritage relics are found during the construction phase, heritage authorities will be advised, and a heritage specialist will be called to attend.



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Matenga, E. 2022. Heritage Management Plan for Graves and Burial Grounds at Two Rivers Platinum Mine in the Fetakgomo Tubatse Local Municipality, Limpopo Province

The Heritage Management Plan provide a framework for both the Mine and Community. It establishes a common understanding of key grievance elements and how to resolve them. The plan addresses grievances related to grave maintenance, conservation, and consultation with families concerning the treatment of graves and human remains in the footprint of the Mine

Final Comment

The following comments are made as a 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 BAR and EMP:

- 38(4)a – The SAHRA Development Application Unit (DAU) has no objections to the proposed development.
- 38(4)b – The recommendations provided by the heritage 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 (Nokusho Ngobeni/Natasha Higgitt 021 202 8660) 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)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (Nokusho Ngobeni/Natasha Higgitt 021 202 8660), must be alerted immediately as per section 36(6) 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(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 proposed development of a cemetery site on Portion 6 of the Farm
Dwarsrivier 372 KT**



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- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the case file.
- The Final BAR and EMPr must be submitted to SAHRA for record purposes.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokusho Ngobeni

South African Heritage Resources Agency

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.

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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.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/382968>