

# HERITAGE IMPACT ASSESSMENT

(REQUIRED UNDER SECTION 38(8) OF THE NHRA (No. 25 OF 1999))

FOR THE PROPOSED INZALO CRUSHING AND AGGREGATES MINING PERMIT  
CLOSE TO ERMELO, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA  
PROVINCE.

**Type of development:**

Mining

**Client:**

Greenmined Environmental (Pty) Ltd

**Developer:**

Inzalo Crushing and Aggregates (Pty) Ltd



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*Heritage*

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Project Reference:

Project number 2229

Report date:

March 2022

## APPROVAL PAGE

<b>Project Name</b>	Inzalo Crushing and Aggregates Mining Permit
<b>Report Title</b>	Heritage Impact Assessment for the proposed Inzalo Crushing and Aggregates Mining Permit on a portion of Portion 15 on Farm Rietspruit 437, IS, Msukaligwa Local Municipality, Mpumalanga Province.
<b>Authority Reference Number</b>	TBC
<b>Report Status</b>	Draft Report
<b>Applicant Name</b>	Inzalo Crushing and Aggregates (Pty) Ltd

<b>Responsibility</b>	<b>Name</b>	<b>Qualifications and Certifications</b>	<b>Date</b>
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<b>Palaeontological Assessment</b>	Prof Marion Bamford – Palaeontologist	PhD Palaeobotany	March 2022

## DOCUMENT PROGRESS

## Distribution List

Date	Report Reference Number	Document Distribution	Number of Copies
10 March 2022	2229	Greenmined Environmental (Pty) Ltd	Electronic Copy

## Amendments on Document

Date	Report Reference Number	Description of Amendment

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## REPORT OUTLINE

Appendix 6 of the GNR 326 EIA Regulations published on 7 April 2017 provides the requirements for specialist reports undertaken as part of the environmental authorisation process. In line with this, Table 1 provides an overview of Appendix 6 together with information on how these requirements have been met.

**Table 1. Specialist Report Requirements.**

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of - (i) the specialist who prepared the report; and (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae	Section a Section 12
(b) Declaration that the specialist is independent in a form as may be specified by the competent authority	<i>Declaration of Independence</i>
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 1
(cA) an indication of the quality and age of base data used for the specialist report	Section 3.4 and 7.1.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	9
(d) Duration, Date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3.4
(e) Description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of site plan identifying site alternatives;	Section 8 and 9
(g) Identification of any areas to be avoided, including buffers	Section 8 and 9
(h) Map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers	Section 8
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 3.7
(j) a description of the findings and potential implications of such findings on the impact of the proposed activity including identified alternatives on the environment or activities;	Section 1.3
(k) Mitigation measures for inclusion in the EMPr	Section 10.1
(l) Conditions for inclusion in the environmental authorisation	Section 10. 1.
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 10. 5.
(n) Reasoned opinion - (i) as to whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and (ii) if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 10.3
(o) Description of any consultation process that was undertaken during the course of preparing the specialist report	Section 6
(p) A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Refer to BAR report
(q) Any other information requested by the competent authority	N.A

## Executive Summary

Greenmined Environmental (Pty) Ltd was appointed as the Environmental Assessment Practitioner (EAP) by Inzalo Crushing and Aggregates (Pty) Ltd to undertake the required Environmental Authorisation Process for the mining permit to mine stone aggregate/ gravel on a portion of Portion 15 on Farm Rietspruit 437, IS, Msukaligwa Local Municipality, Mpumalanga Province. Beyond Heritage was appointed to conduct a Heritage Impact Assessment (HIA) for the project and the study area was assessed on desktop level and by a non-intrusive pedestrian field survey. Key findings of the assessment include:


- The surrounding area is characterised by cultivated fields and other agricultural activities, while existing mining activities occur adjacent to the study area;
- The study area is located on a rocky ridge characterised by large dolerite boulders and dense vegetation cover that limited heritage visibility;
- Examination of historical topographic maps and aerial images showed no structures or stone walled settlements in the study area and the impact footprint is considered to be of low heritage potential. This was confirmed during the site visit and no heritage finds of significance was recorded during the survey;
- The palaeontological sensitivity of the study area is insignificant, but the study area is adjacent to an area of very high significance and this was addressed in an independent study. Bamford (2022) concluded that the proposed site lies on the non-fossiliferous Jurassic dolerite but is very close to the very highly sensitive Vryheid Formation that could preserve fossil plants of the Glossopteris flora. No fossils were found during the site visit. Nonetheless a Fossil Chance Find Protocol should be added to the EMPr.

The impact to heritage resources is low and the project can commence provided that the recommendations in this report are adhered to, based on the South African Heritage Resource Authority (SAHRA) 's approval.

## Recommendations:

- Implementation of a chance find procedure for the project.

**Declaration of Independence**

<b>Specialist Name</b>	Jaco van der Walt
<b>Declaration of Independence</b>	<p>I declare, as a specialist appointed in terms of the National Environmental Management Act (Act No 108 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations, that I:</p> <ul style="list-style-type: none"> <li>• I act as the independent specialist in this application;</li> <li>• I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;</li> <li>• I declare that there are no circumstances that may compromise my objectivity in performing such work;</li> <li>• I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;</li> <li>• I will comply with the Act, Regulations and all other applicable legislation;</li> <li>• I have no, and will not engage in, conflicting interests in the undertaking of the activity;</li> <li>• I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;</li> <li>• All the particulars furnished by me in this form are true and correct; and</li> <li>• I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.</li> </ul>
<b>Signature</b>	
<b>Date</b>	8/03/2022

**a) Expertise of the specialist**

Jaco van der Walt has been practising as a CRM archaeologist for 15 years. He obtained an MA degree in Archaeology from the University of the Witwatersrand focussing on the Iron Age in 2012 and is a PhD candidate at the University of Johannesburg focussing on Stone Age Archaeology with specific interest in the Middle Stone Age (MSA) and Later Stone Age (LSA). Jaco is an accredited member of ASAPA (#159) and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, KZN as well as he Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, DRC Zambia, Guinea and Tanzania. Through this, he has a sound understanding of the IFC Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage.

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**ABBREVIATIONS**

ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
BIA: Basic Impact Assessment
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DEA: Department of Environmental Affairs
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMPr: Environmental Management Programme
ESA: Early Stone Age
ESIA: Environmental and Social Impact Assessment
GIS Geographical Information System
GPS: Global Positioning System
GRP Grave Relocation Plan
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)
MSA: Middle Stone Age
NEMA National Environmental Management Act, 1998 (Act No. 107 of 1998)
NHRA National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NID Notification of Intent to Develop
NoK Next-of-Kin
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

*\*Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

**GLOSSARY**

Archaeological site (remains of human activity over 100 years old)

Early Stone Age (~ 2.6 million to 250 000 years ago)

Middle Stone Age (~ 250 000 to 40-25 000 years ago)

Later Stone Age (~ 40-25 000, to recently, 100 years ago)

The Iron Age (~ AD 400 to 1840)

Historic (~ AD 1840 to 1950)

Historic building (over 60 years old)

## 1 Introduction and Terms of Reference:

Beyond Heritage was appointed to conduct a HIA for the mining permit to mine stone aggregate/ gravel on a portion of Portion 15 on Farm Rietspruit 437, IS, Msukaligwa Local Municipality, Mpumalanga Province. (Figure 1.1 to 1.4). The report forms part of the Basic Assessment Report (BAR) and Environmental Management Programme Report (EMPr) for the development.

The aim of the study is to survey the proposed development footprint to identify cultural heritage sites, document, and assess their importance within local, provincial, and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999). The report outlines the approach and methodology utilized before and during the survey, which includes Phase 1, review of relevant literature; Phase 2, the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

During the survey, no sites of significance were recorded. General site conditions and features on sites were recorded by means of photographs, GPS locations and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report. SAHRA as a commenting authority under section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) require all environmental documents, compiled in support of an Environmental Authorisation application as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA for commenting. Upon submission to SAHRA the project will be automatically given a case number as reference. As such the EIA report and its appendices must be submitted to the case as well as the EMPr, once it's completed by the Environmental Assessment Practitioner (EAP).

### 1.1 Terms of Reference

#### Field study

Conduct a field study to: (a) locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources affected by the proposed development.

#### Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with the relevant legislation, SAHRA minimum standards and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999).

## 1.2 Project Description

Project components and the location of the proposed mining right are outlined under Table 2 and 3.

**Table 2: Project Description**

<b>Farm and Magisterial District</b>	A portion of Portion 15 on Farm Rietspruit 437, IS, Msukaligwa Local Municipality, Mpumalanga Province.
<b>Central co-ordinate of the development</b>	26°34'0.56"S and 29°56'4.45"E
<b>Topographic Map Number</b>	2629BD

**Table 3: Infrastructure and project activities**

<b>Type of development</b>	Mining
<b>Size of development</b>	4,9 hectares

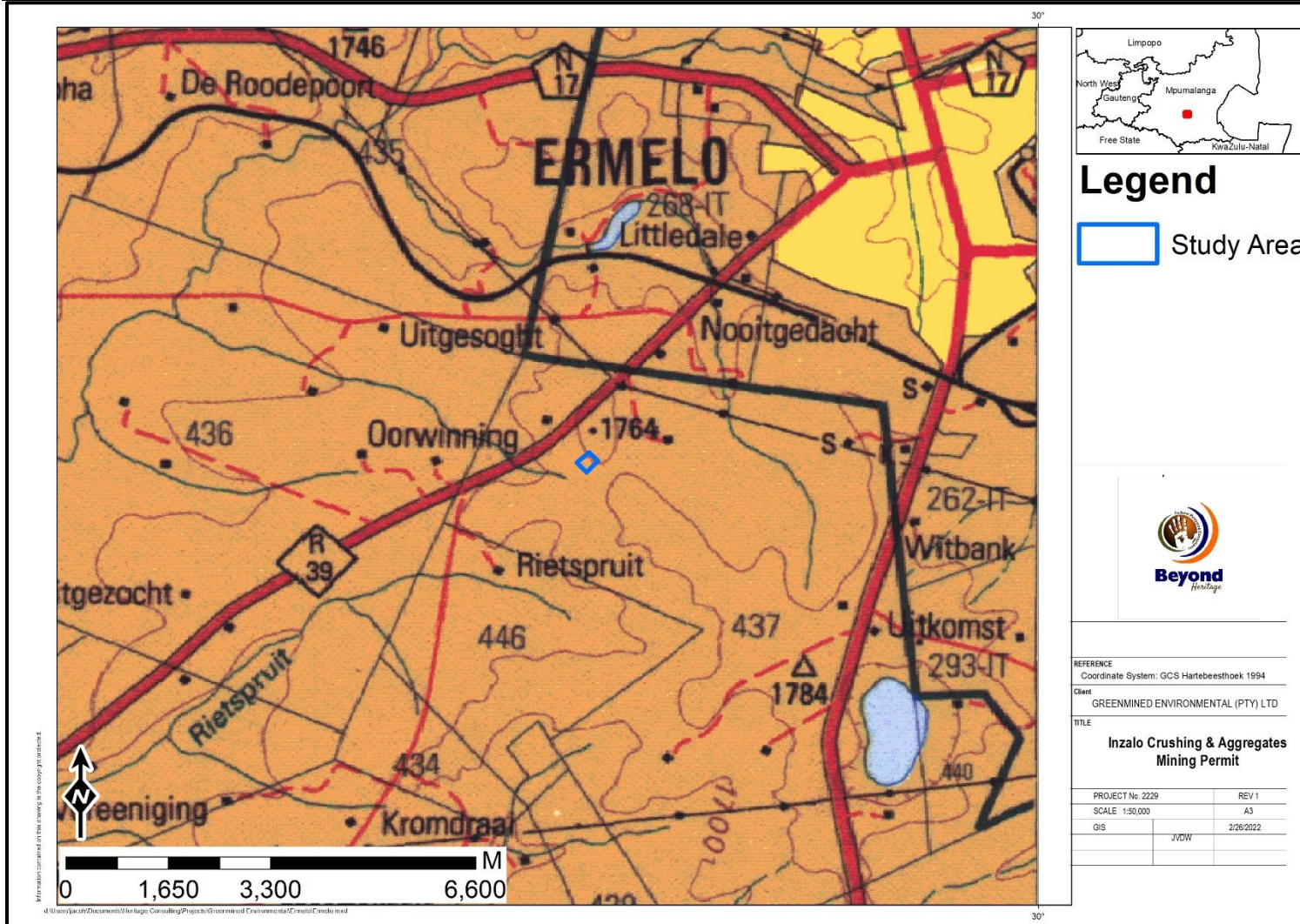
<p><b>Project Components</b></p>	<p>The applicant intends to win material from the area for at least 2 years with a possible extension of another 3 years. The aggregate to be removed from the quarry will be used local construction and building projects in the vicinity. The proposed quarry will therefore contribute to the upgrading / maintenance of road infrastructure and building contracts in and around the Ermelo area.</p> <p>The mining activities will consist out of the following:</p> <ul style="list-style-type: none"> <li>• Stripping and stockpiling of topsoil;</li> <li>• Blasting</li> <li>• Excavating;</li> <li>• Crushing &amp; Screening;</li> <li>• Stockpiling and transporting;</li> <li>• Sloping and landscaping upon closure of the site; and</li> <li>• Replacing the topsoil and vegetation the disturbed area.</li> </ul> <p>The mining site will contain the following:</p> <ul style="list-style-type: none"> <li>• Drilling equipment;</li> <li>• Excavating equipment;</li> <li>• Earth moving equipment</li> </ul> <p>Static crushing and screening plants</p> <ul style="list-style-type: none"> <li>• Access Roads;</li> <li>• Site Office (Containers);</li> <li>• Site vehicles;</li> <li>• Parking area for visitors and site vehicles;</li> <li>• Vehicle service area;</li> <li>• Wash bay;</li> <li>• Workshop (Containers);</li> <li>• Salvage Yard;</li> <li>• Bunded diesel and oil storage facilities;</li> <li>• Generator on bunded area;</li> <li>• Ablution Facilities (Chemical Toilets);</li> <li>• Weigh Bridge; and</li> <li>• Demarcated general and hazardous waste area.</li> </ul> <p><b>ACCESS ROUTE:</b> Access to the proposed mining area will be via the R39, making use of the new internal/haul roads to access the mining area. Haul roads will be extended as the open cast mining progress, and will be rehabilitated as part of the final reinstatement of the area. Trucks delivering the materials to the destinations will take the R39 provincial route.</p> <p><b>WATER USE:</b> Any water required for the implementation of the project will be bought and transported to site.</p> <p><b>ELECTRICITY:</b> Generators will be used to power the plant on site, if a connection to the existing power infrastructure cannot be secured. Mobile containers will be placed inside the mining footprint that will serve as offices and storage units. A weighbridge will be added to the site and the crushing and screening plant will operate within a designated processing area (within the 5 ha permit footprint).</p>
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### 1.3 Alternatives

Two alternatives were initially proposed but only one area was provided for consideration in the HIA by the Environmental Practitioner. The extent of the area assessed allows for siting of the development within this alternative to minimize impacts to heritage resources.

Draft





### Legend

Study Area



REFERENCE	
Coordinate System: GCS Hartebeesthoek 1994	
Client	
GREENMINED ENVIRONMENTAL (PTY) LTD	
TITLE	
<b>Inzalo Crushing &amp; Aggregates Mining Permit</b>	
PROJECT No: 2229	REV 1
SCALE 1:50,000	A3
GIS	JVDW 2/26/2022

Figure 1.1. Regional setting of the project (1: 250 000 topographical map).



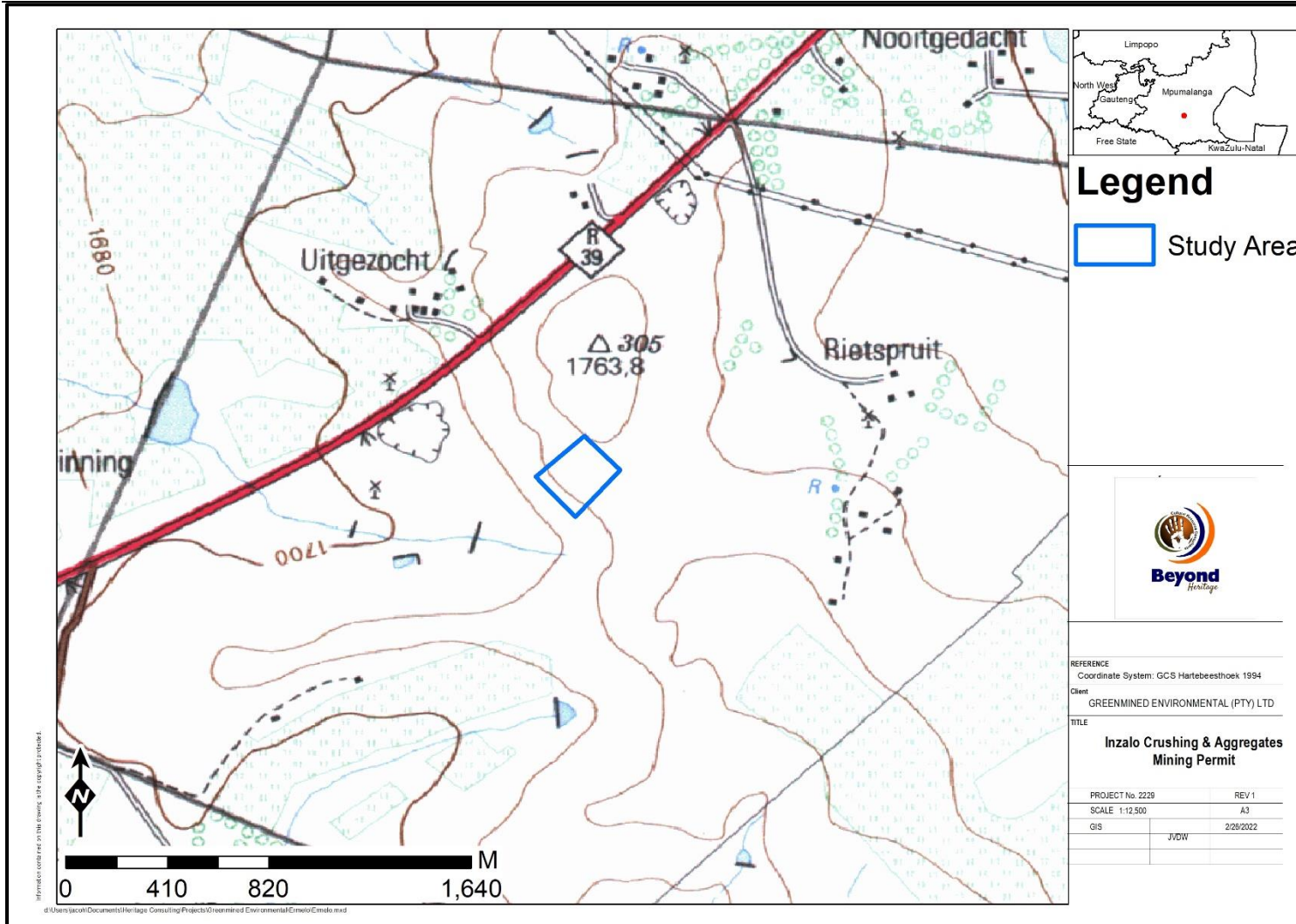


Figure 1.2. Local setting of the project (1: 50 000 topographical map).

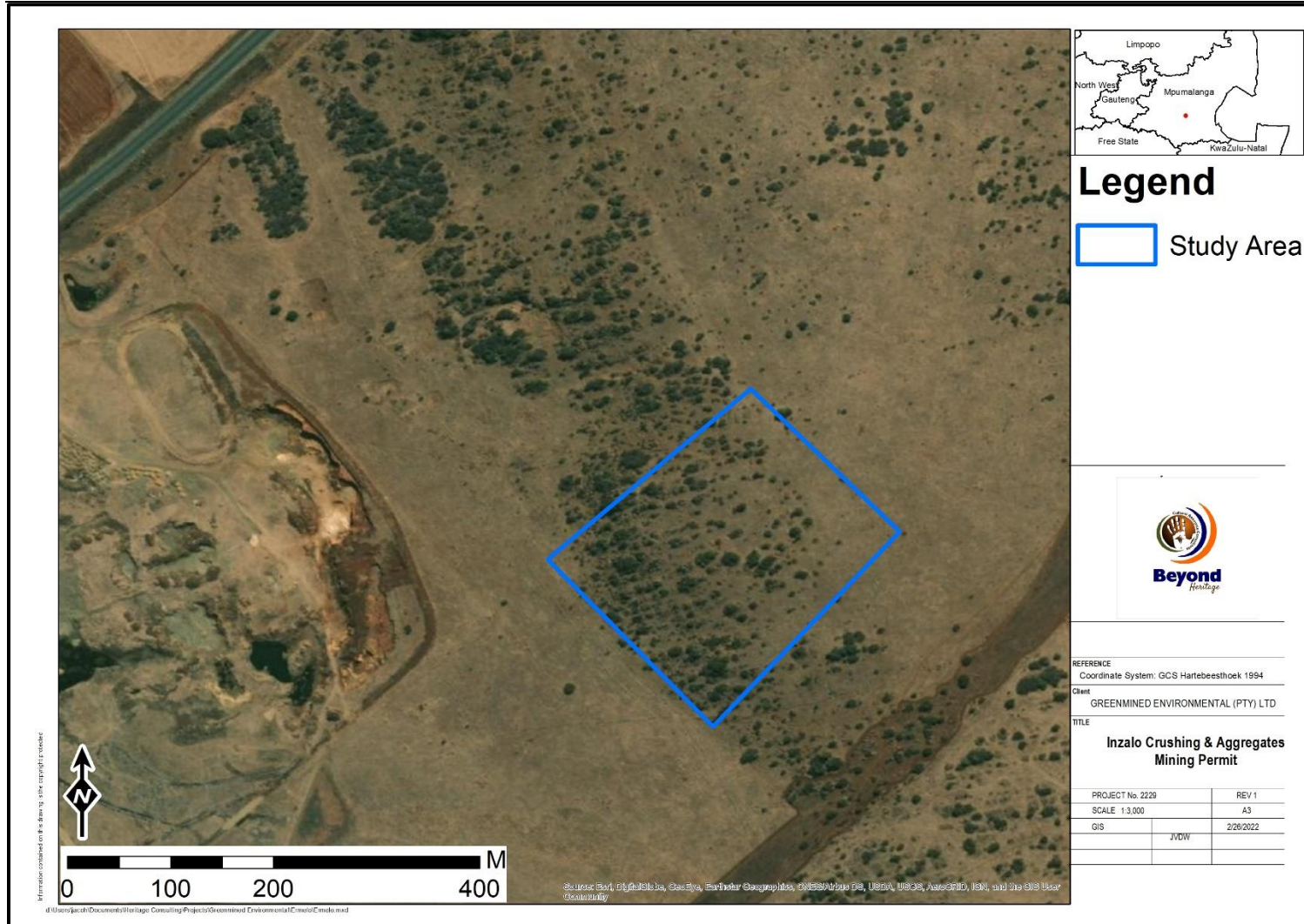


Figure 1.3. Aerial image showing the existing quarry adjacent to the study area.

## 2 Legislative Requirements

The HIA, as a specialist sub-section of the EIA, is required under the following legislation:

- National Heritage Resources Act (NHRA), Act No. 25 of 1999)
- National Environmental Management Act (NEMA), Act No. 107 of 1998 - Section 23(2)(b)
- Mineral and Petroleum Resources Development Act (MPRDA), Act No. 28 of 2002 - Section 39(3)(b)(iii)

A Phase 1 HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation.

The overall purpose of heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources; and
- Make recommendations for the appropriate heritage management of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMPr, to the PHRA if established in the province or to SAHRA. SAHRA will ultimately be responsible for the evaluation of Phase 1 HIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 HIA reports and additional development information, as per the impact assessment report and/or EMPr, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 HIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level). Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 HIA's are primarily concerned with the location and identification of heritage sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision-making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for with SAHRA by the applicant before development may proceed.



Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance No. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

### 3 METHODOLOGY

#### 3.1 Literature Review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

#### 3.2 Genealogical Society and Google Earth Monuments

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located; these locations were marked and visited during the fieldwork phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

#### 3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any EA process, it involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern (for the purposes of this report only heritage related issues will be included). The aim of the public consultation process was to capture and address any issues raised by community members and other stakeholders during key stakeholder and public meetings.

### 3.4 Site Investigation

The aim of the site visit was to:

- a) survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest;
- b) record GPS points of sites/areas identified as significant areas;
- c) determine the levels of significance of the various types of heritage resources recorded in the project area.

**Table 4: Site Investigation Details**

	Site Investigation
Date	24 February 2022
Season	Summer – Grass cover limited archaeological visibility but the development footprint was sufficiently covered to understand the heritage character of the area (Figure 3.1).

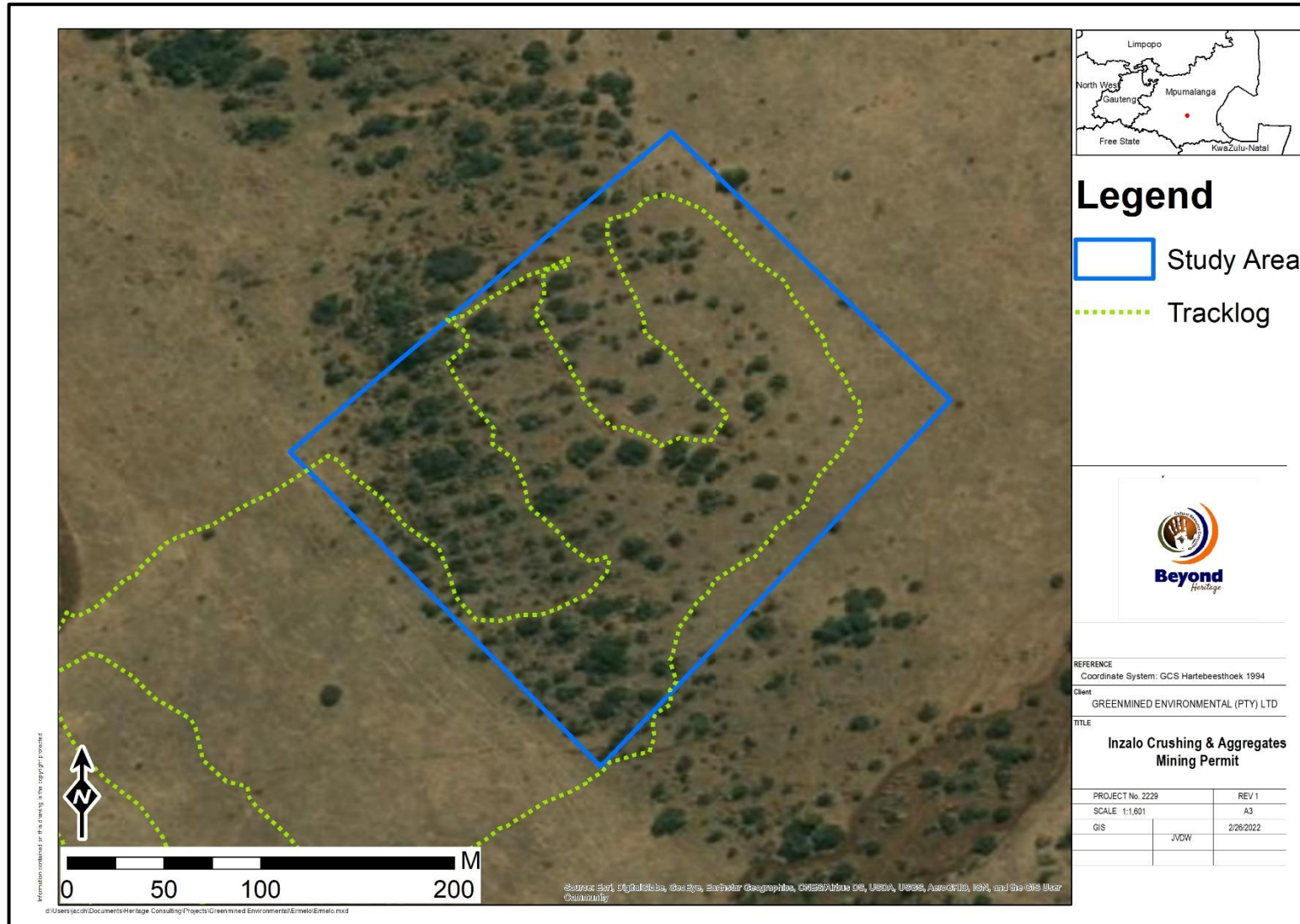


Figure 3.1. Tracklog of the survey path in green.

### 3.5 Site Significance and Field Rating

Section 3 of the NHRA distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa's history;
- Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface. This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance with cognisance of Section 3 of the NHRA:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- The wider historic, archaeological and geographic context of the site;
- The location of the site in relation to other similar sites or features;
- The depth of the archaeological deposit (when it can be determined/is known);
- The preservation condition of the sites; and
- Potential to answer present research questions.

In addition to this criteria field ratings prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 10 of this report.

**Table 5. Heritage significance and field ratings**

<b>FIELD RATING</b>	<b>GRADE</b>	<b>SIGNIFICANCE</b>	<b>RECOMMENDED MITIGATION</b>
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be retained)
Generally Protected A (GP. A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP. B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

### 3.6 Impact Assessment Methodology

The criteria below are used to establish the impact rating on sites:

- The **nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- The **duration**, wherein it will be indicated whether:
  - \* the lifetime of the impact will be of a very short duration (0-1 years), assigned a score of 1;
  - \* the lifetime of the impact will be of a short duration (2-5 years), assigned a score of 2;
  - \* medium-term (5-15 years), assigned a score of 3;
  - \* long term (> 15 years), assigned a score of 4; or
  - \* permanent, assigned a score of 5;
- The **magnitude**, quantified on a scale from 0-10 where; 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale of 1-5 where; 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
- The **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
- the **status**, which will be described as either positive, negative or neutral.
- the degree to which the impact can be reversed.
- the degree to which the impact may cause irreplaceable loss of resources.
- the *degree* to which the impact can be mitigated.



The **significance** is calculated by combining the criteria in the following formula:

$$S=(E+D+M) P$$

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- < 30 points: Low (i.e., where this impact would not have a direct influence on the decision to develop in the area),
- 30-60 points: Medium (i.e., where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- 60 points: High (i.e., where the impact must have an influence on the decision process to develop in the area).

### 3.7 Limitations and Constraints of the study

The authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the nature of heritage resources and pedestrian surveys, the possibility exists that some features or artefacts may not have been discovered/recorded and the possible occurrence of graves and other cultural material cannot be excluded. This report only deals with the footprint area of the proposed development and consisted of non-intrusive surface surveys. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components would have been highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this Impact Assessment.

## 4 Description of Socio-Economic Environment

According to Census 2011, Msukaligwa Local Municipality has a total population of 149 377 people, of which 88,1% are black African, 9,8% are white, 1,1% are Indian/Asian, and 0,6% are coloured. The other population groups make up the remaining 0,3%. Of those aged 20 years and older, 4,5% have completed primary school, 32,7% have some secondary education, 29,3% have completed matric, 9,6% have some form of higher education, and 12,3% have no form of schooling.

According to Census 2011, 41 698 are employed whereas 5 311 are discouraged work-seekers. The unemployment rate is 26,8%. There are 15 267 unemployed people. Of the youth aged 15–34, 20 261 are employed while 10 679 are unemployed. The unemployment rate for the youth is 34,5%.

## 5 Results of Public Consultation and Stakeholder Engagement:

### 5.1.1 Stakeholder Identification

Adjacent landowners and the public at large were informed of the proposed activity as part of the BA process by the EAP. Site notices and advertisements notifying interested and affected parties were placed at strategic points and in local newspapers as part of the process. No heritage concerns was raised.

## 6 Literature / Background Study:

### 6.1 Literature Review (SAHRIS)

The reports indicated in Table 6 were conducted in the immediate vicinity of the study area and were consulted for this report:

**Table 6. Studies conducted in the surrounding area.**

Author	Year	Project	Findings
Van Schalkwyk, L.	2006	Heritage Impact Assessment for the Majuba-Umfolozi 765 KV Transmission Line in Mpumalanga and KwaZulu-Natal, South Africa, Pietermaritzburg: eThembeni Cultural Heritage	Ancestral graves; Rock painting sites that were recorded along and below the eastern uKhahlamba escarpment; Stone Age open air sites; Stone walled settlements dating to the Late Iron Age; Battlefields of: - Majuba (1887); - Hlobane (1879); - Holkrantz (1879); - Khambula (1879)
Fourie, W.	2008	Camden Power Station Rail expansion project on portions of the farm Mooiplaats 290 IT and the farm Camden Power Station 329 IT, District Ermelo, Mpumalanga	The remains of a stone ruin were identified at this location. The structure consists of two rooms. Only the foundations and rubble remain of the structure. Recent historic
Gaigher, S.	2011	First Phase Heritage Impact Assessment for the Proposed Extension to the Camden Ash Disposal Facilities	Small graveyard (5 graves), historic farmland reservoirs, furrows, pathways.
Pistorius, J.C.C.	2011	Kusipongo Expansion Project: A Heritage Baseline Study for Proposed Adit Positions in a Project Area near the Heyshope Dam to the West of Piet Retief in the Mpumalanga Province of South Africa, KwaZulu-Natal: Environmental Resources Management (South Africa) Pty Ltd (ERM)	A single, historic informal grave with stone dressing. A single square cattle enclosure. Late Iron Age site with stone wall enclosures. historical graveyard demarcated with stone walling. A sandstone bank that may be associated with Stone Age sites.
Van Schalkwyk, J.	2012	Basic assessment and environmental management programme: Construction of a 132kV transmission Line from the Kliphoek to Panbult Substation and Kliphoek to Uitkoms Substation: Mpumalanga Province	Some farmsteads and other farming related features. A number of formal and informal cemeteries
Nel, J. & Karodia, S.	2013	Heritage Impact Assessment Report Kangra Coal	Historical structures and associated trees, cemeteries, sandstone outcrop with potential for Rock Art
Van der Walt, J.	2015	Camden Ash Disposal – Grave confirmation study	Four cemeteries and two historical structures as well as stone cairns.
Gaigher, S.	2015	Report on the Social Consultation Regarding the Relocation of Graves within the Proposed Development Area for the Camden Ash Disposal Facilities	Burial sites (19 graves, 7 graves 2 graves and 5 graves respectively).
Van Schalkwyk, J.	2016	Cultural Heritage Impact assessment for the planned borrow pits and quarries for the improvement of the national route N2, km 60 (Leiden) to km 87.4 (Camden), Gert Sibande District Municipality, Mpumalanga Province	Historic informal cemetery with more than 35 graves. Three old railway culverts that formed part of the original railroad alignment which was constructed in 1911.

			An old sheep dip constructed from concrete.
Matenga, E.	2020	Heritage Impact Assessment for the proposed improvements to the existing waste reticulation system at Camden power station in Ermelo, Mpumalanga Province	None

### 6.1.1 Google Earth and The Genealogical Society of South Africa (Graves and burial sites)

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where archaeological and historical sites might be located. The database of the Genealogical Society of South Africa indicated no known grave sites within the study area

## 6.2 Archaeological Background

The archaeological record for the greater study area consists of the Stone Age and Iron Age.

### 6.2.1 Stone Age

The Stone Age of southern Africa starts when hominins (ancestral to modern-day humans) first started to produce crude tools made with stone. The Earlier Stone Age (2 million - 200 000 years ago) is associated with hominins such as *Homo habilis* and *Homo erectus* (Dusseldorp *et al.* 2013). Mpumalanga currently does not have an extensive ESA archaeological record, at Maleoskop on the farm Rietkloof, only a few ESA artefacts have been found and stone tools consisted of choppers (Oldowan), hand axes, and cleavers (Acheulean) (Esterhuysen & Smith 2007) and some surface scatters have been recorded near Piet Retief (Nel & Karodia 2013).

Middle Stone Age artefacts represents archaic and modern humans that occupied the landscape between 300 000 to 40 000 before present. Later Stone Age occupational sequences reflect San and Khoisan communities from 40 000 years ago until recently (Dusseldorp *et al.* 2013). Although the MSA and LSA has not been extensively studied in Mpumalanga, evidence for these periods has been excavated from Bushman Rock Shelter in the Ohrigstad District (Esterhuysen & Smith 2007; Lombard *et al.* 2012) and it is known that San communities lived near Lake Chrissie as recently as the 1950s (e.g., Schlebusch *et al.* 2016). MSA and LSA surface scatters have also been investigated in the vicinity of Piet Retief, and De Wittekrans nearby Camden is a Later Stone Age archaeological rock art site complex (Nel & Karodia 2013).

### 6.2.2 Iron Age

The archaeology of farming communities of southern Africa encompasses three phases. The Early Iron Age (200-900 CE) represents the arrival of Bantu-speaking farmers in southern Africa. Living in sedentary settlements often located next to rivers, these farmers cultivated sorghum, beans, cowpeas, and kept livestock. The Middle Iron Age (900-1300 CE) is mostly confined to the Limpopo Valley in southern Africa with Mapungubwe Hill probably representing the earliest 'state' in this region (Huffman 2007).

The Late Iron Age (1300-1840s CE) marks the arrival and spread of ancestral Eastern Bantu-speaking Nguni and Sotho-Tswana communities into southern Africa. The location of Late Iron Age settlements is usually on or near hilltops for defensive purposes. The Late Iron Age as an archaeological period ended by 1840 CE, when the Mfecane caused major socio-political disruptions in southern Africa (Huffman 2007).

Dates from Early Iron Age sites indicated that by the beginning of the 5<sup>th</sup> century CE Bantu-speaking farmers had settled in the Mpumalanga lowveld. Subsequently, farmers continued to move into and between the lowveld and highveld of Mpumalanga. Iron Age sites such as Welgelegen Shelter, Robertsdrift and Tafelkop situated 50-100 km west of the study area dates from the 12<sup>th</sup> to the 18<sup>th</sup> century (Derricourt & Evers 1973; Esterhuysen & Smith 2007).

### 6.2.3 Historical context of Camden

The town of Ermelo has a rich history. The earliest record for settlers in Ermelo is from 1860, when the area was under the jurisdiction of Zulu-speaking Nhlapo communities (Nhlapo 1945). The construction of the town of Ermelo was initiated by the Dutch Reformed Church, which purchased the eastern part of the farm Nooitgedacht on 26 May 1879. The town was officially proclaimed on 12 February 1880 by William Owen Lanyon, the Administrator of the Transvaal (Greyling 2017).

### 6.2.4 Battlefields and war history

Due to the proximity of Ermelo to the Nederlandsche Zuid-Afrikaansche Spoorweg-Maatskappij railway line linking Pretoria with Lourenço Marques (Maputo), the area was subject to various skirmishes during the Anglo-Boer War of 1899-1902. At the time there were about 100 families residing in the town and many women and children were sent to British concentration camps. In 1901, British troops burnt the town down due to their scorched earth policy, and Ermelo was rebuilt in 1903 (Moody 1977; Pretorius 2000; Van Schalkwyk 2012; Greyling 2017).

## 7 Description of the Physical Environment

The project area is in the jurisdiction of the Msukaligwa Local Municipality, with Ermelo being the nearest town. The study area is fallow, and the surrounding properties are used for mixed agricultural purposes as well as mining and industrial activities. According to Mucina and Rutherford (2012) the area is characterised by undulating grassland plains, with small, scattered patches of dolerite outcrops in areas. The vegetation is comprised of grassland cover, largely dominated by a dense *Themeda triandra* sward. No structures or features occur in the study area that is marked by a small ridge. General site conditions are illustrated in Figure 7.1 to 7.2.





Figure 7.1. General site conditions indicating vegetation cover in the surrounding area.



Figure 7.2. General site conditions with thickets of on the ridge.



Figure 7.3. General site conditions on the ridge – note the large boulders and vegetation cover.



Figure 7.4. Existing access roads in the study area.



## 8 Findings of the Survey

### 8.1 Heritage Resources

The proposed project area is situated about 5km southwest of Ermelo along the R39 heading towards Morgenzon. The project area is located within an active mining property on a rocky ridge running across the landscape. The proposed footprint of the project is located on a slope against the rocky ridge marked by large boulders.

The surrounding area is characterised by cultivated fields and other agricultural activities, while the adjacent area is used for mining activities. During the survey no structures, graves or heritage finds of significance was recorded.

### 8.2 Cultural Landscape

The study area is rural in character with no developments older than 60 years within the impact area (Figure 8.6 & 8.7).

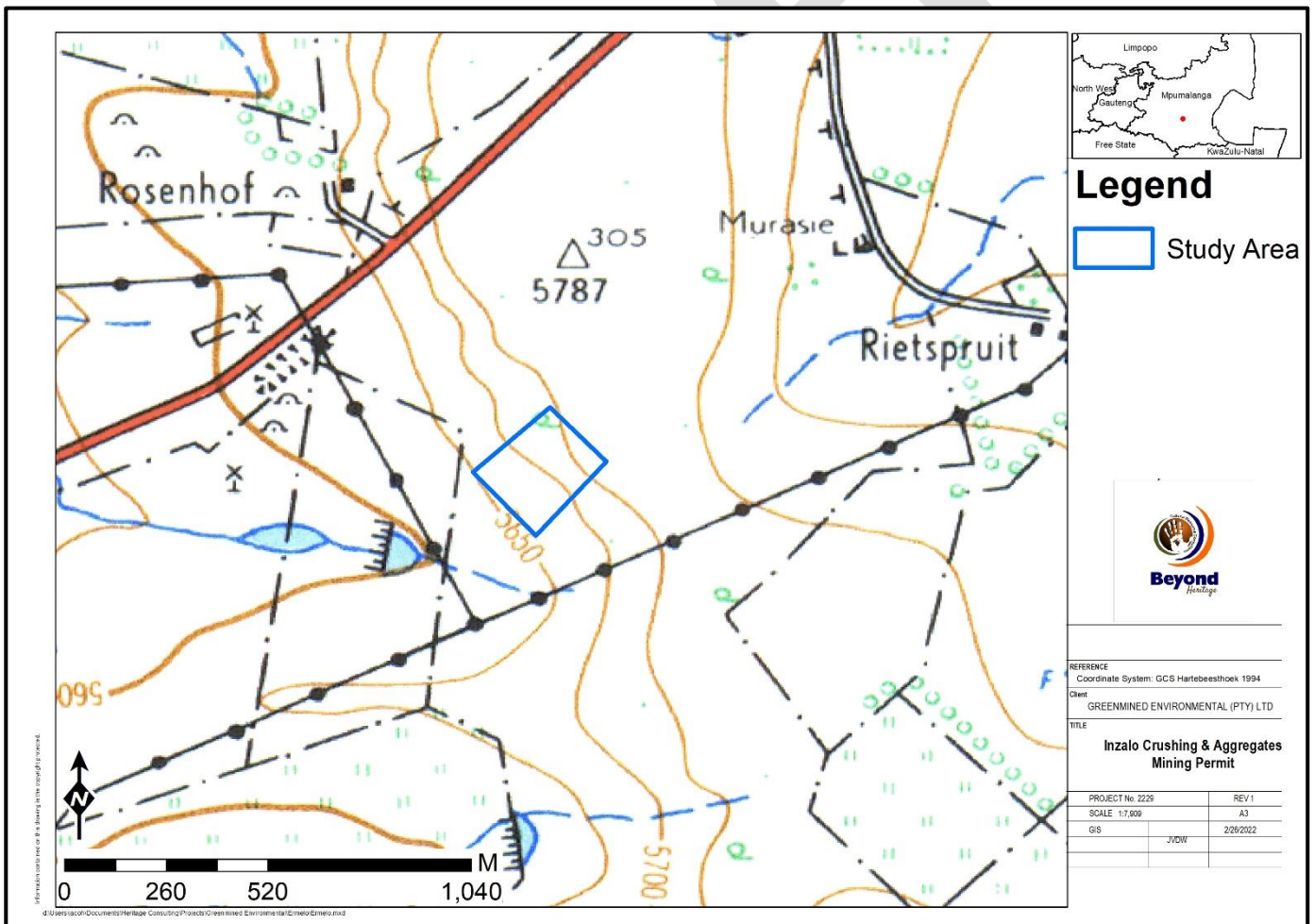


Figure 8.1. 1964 Aerial image of the study area showing no development in the study area.

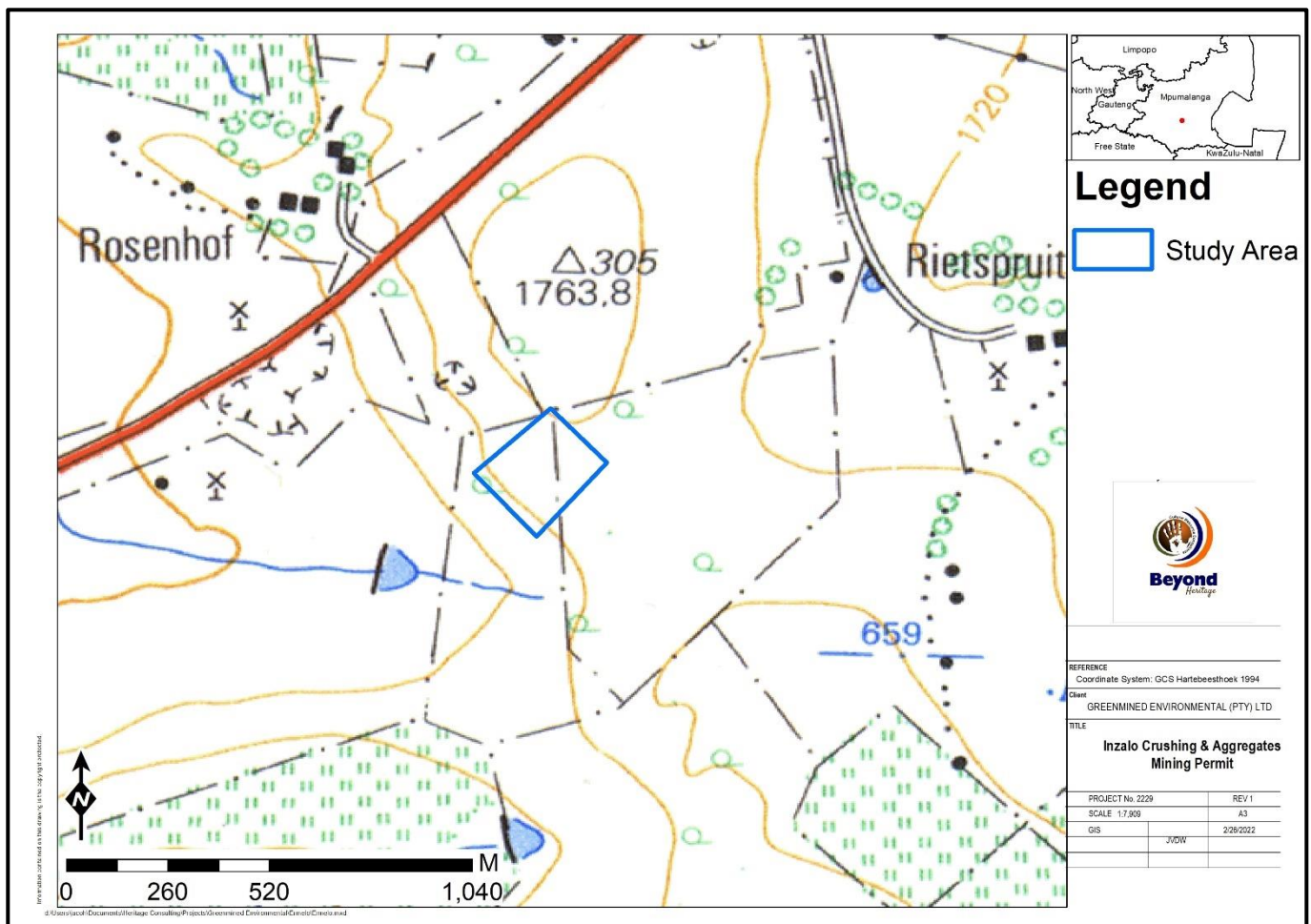
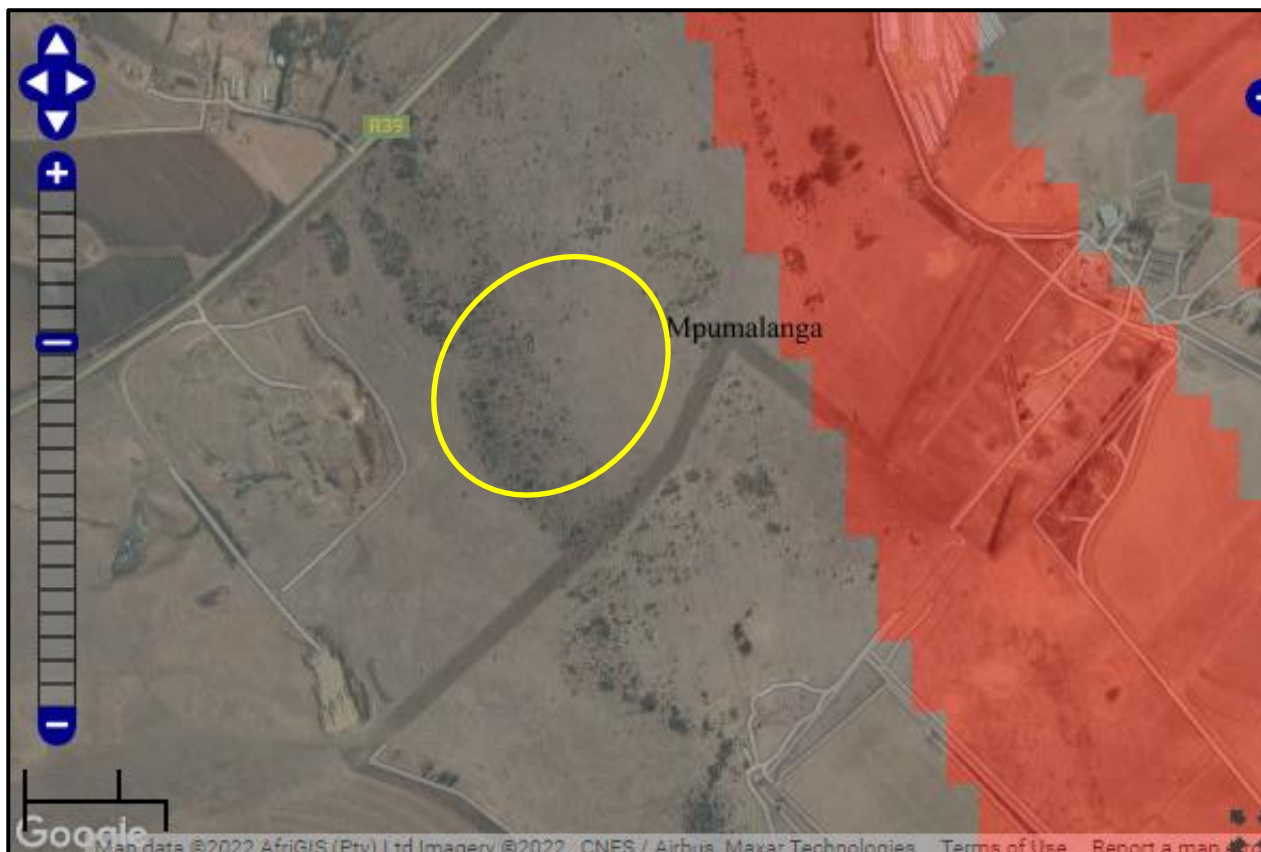


Figure 8.2. 1969 Aerial image of the study area indicating no developments in the study area and cultivation in the surrounding areas.

### 8.3 Paleontological Heritage

According to the SAHRA Paleontological map the study area is of insignificant paleontological significance (Figure 8.1) but it is very close to an area of very high significance and an independent study was conducted for this aspect. Bamford (2022) concluded that the proposed site lies on the non-fossiliferous Jurassic dolerite but is very close to the very highly sensitive Vryheid Formation that could preserve fossil plants of the Glossopteris flora. No fossils were found during the site visit. Nonetheless a Fossil Chance Find Protocol should be added to the EMPr.



Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	Desktop study is required
BLUE	LOW	No palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	No palaeontological studies are required
WHITE/CLEAR	UNKNOWN	These areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map

Table 7. Paleontological sensitivity of the approximate study area (yellow polygon) as indicated on the SAHRA Palaeontological sensitivity map.



## 9 Potential Impact

No heritage sites of significance occur within the impact area and no adverse impact to heritage resources is expected. Any additional effects to subsurface heritage resources can be successfully mitigated by implementing a chance find procedure. Mitigation measures as recommended in this report should be implemented during all phases of the project. Impacts of the project on heritage resources is expected to be low during all phases of the development (Table 8).

### 9.1.1 Pre-Construction phase

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure. These activities can have a negative and irreversible impact on heritage features if any occur. Impacts include destruction or partial destruction of non-renewable heritage resources.

### 9.1.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. Potential impacts include destruction or partial destruction of non-renewable heritage resources.

### 9.1.3 Operation Phase

No impacts are expected during the operation phase.

### 9.1.4 Impact Assessment for the Project

**Table 8.** Impact assessment of the proposed project.

	Without mitigation	With mitigation (Preservation/ excavation of site)
<b>Nature:</b> During the construction phase activities resulting in disturbance of surfaces and/or sub-surfaces may destroy, damage, alter, or remove from its original position archaeological and paleontological material or objects.		
<b>Extent</b>	Local (2)	Local (2)
<b>Duration</b>	Permanent (5)	Permanent (5)
<b>Magnitude</b>	Minor (2)	Minor (2)
<b>Probability</b>	Improbable (2)	Improbable (2)
<b>Significance</b>	<b>18 (Low)</b>	<b>18 (Low)</b>
<b>Status (positive or negative)</b>	Negative	Negative
<b>Reversibility</b>	Not reversible	Not reversible
<b>Irreplaceable loss of resources?</b>	Yes	Yes
<b>Can impacts be mitigated?</b>	NA	NA
<b>Mitigation:</b>		
<ul style="list-style-type: none"> <li>Implementation of a chance find procedure for the project;</li> </ul>		
<b>Cumulative impacts:</b>		
The proposed project will have a low cumulative impact as no known heritage resources will be adversely affected.		
<b>Residual Impacts:</b>		
Although surface sites can be avoided or mitigated, there is a chance that completely buried sites would still be impacted on, but this cannot be quantified.		

## 10 Conclusion and recommendations

The study area is fallow and has not been developed or impacted on by adjacent mining activities. Examination of historical topographic maps and aerial images showed no structures or stone walled settlements in the study area and the impact footprint is considered to be of low heritage potential. This was confirmed during the site visit and no heritage finds of significance was recorded during the survey.

According to the SAHRA Paleontological sensitivity map the study area is of insignificant paleontological significance, but very close to an area of very high sensitivity and an independent study was conducted for this aspect. Bamford (2022) concluded that the proposed site lies on the non-fossiliferous Jurassic dolerite but is very close to the very highly sensitive Vryheid Formation that could preserve fossil plants of the Glossopteris flora. No fossils were found during the site visit. Nonetheless a Fossil Chance Find Protocol should be added to the EMPr.

No adverse impact on heritage resources is expected by the project and it is recommended that the project can commence on the condition that the following recommendations (Section 10) are implemented as part of the EMPr and based on approval from SAHRA.

### 10.1 Recommendations for condition of authorisation

The following recommendations for Environmental Authorisation apply and the project may only proceed based on approval from SAHRA:

#### Recommendations:

- Implementation of a chance find procedure for the project (as outlined in Section 10.2).

### 10.2 Chance Find Procedures

#### 10.2.1 Heritage Resources

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped, and a qualified archaeologist must be contacted for an assessment of the find and therefore chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below and monitoring guidelines for this procedure are provided in Section 10.5.

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

### **10.2.2 Chance find protocol for Paleontology – to commence once the excavations / mining activities begin.**

1. The following procedure is only required if fossils are seen on the surface and when mining commences.
2. When excavations begin the sand must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone, coal) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
3. Photographs of similar fossils must be provided to the developer to assist in recognizing the fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones. This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the environmental officer/miners then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil plants or vertebrates that are of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
7. If no good fossil material is recovered, then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.
8. If no fossils are found and the excavations have finished, then no further monitoring is required.

### **10.3 Reasoned Opinion**

The overall impact of the project is considered to be low and residual impacts can be managed to an acceptable level through implementation of the recommendations made in this report. The socio-economic benefits also outweigh the possible impacts of the development if the correct mitigation measures are implemented for the project.

### **10.4 Potential risk**

Potential risks to the proposed project are the occurrence of intangible features and unrecorded cultural resources (of which graves are the highest risk). This can cause delays during construction, as well as additional costs involved in mitigation, as well as additional layout changes.

**10.5 Monitoring Requirements**

Day to day monitoring can be conducted by the Environmental Control Officers (ECO). The ECO or other responsible persons should be trained along the following lines:

- *Induction training:* Responsible staff identified by the developer should attend a short course on heritage management and identification of heritage resources.
- *Site monitoring and watching brief:* As most heritage resources occur below surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are from pre-construction and construction activities. The ECO should monitor all such activities daily. If any heritage resources are found, the chance finds procedure must be followed as outlined above.

Table 9. Monitoring requirements for the project

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
Entire site	Entire project area	ECO	Weekly (Pre construction and construction phase)	Proactively	<ul style="list-style-type: none"> <li>• If risks are manifested (accidental discovery of heritage resources) the chance find procedure should be implemented:                             <ol style="list-style-type: none"> <li>1. Cease all works immediately;</li> <li>2. Report incident to the Sustainability Manager;</li> <li>3. Contact an archaeologist/ palaeontologist to inspect the site;</li> <li>4. Report incident to the competent authority; and</li> <li>5. Employ reasonable mitigation measures in accordance with the requirements of the relevant authorities.</li> </ol> </li> </ul>

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
					<ul style="list-style-type: none"> <li>• Only recommence operations once impacts have been mitigated.</li> </ul>

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10.6 Management Measures for inclusion in the EMPr

Table 10. Heritage Management Plan for EMPr implementation

Area	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Target	Performance indicators (Monitoring tool)
General project area	Implement chance find procedures in case possible heritage finds are uncovered	Mining	Throughout the project	Applicant EAP	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 35, 36 and 38 of NHRA	ECO Checklist/Report

### **10.7 Knowledge Gaps**

Due to the dense vegetation in study area and the often-ephemeral nature of heritage resources, the possibility of discovery of heritage resources during the construction phase cannot be excluded. This limitation is successfully mitigated with the implementation of a chance find procedure and monitoring of the study area by the ECO.

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