



Permit Committee of the Free State Provincial Heritage Resources Authority

Ref: EIA Maluti-a-Phofung Landfill site
15 April 2015
Enquiries: Ntando Mbatha

**DRAFT SCOPING REPORT
FOR
THE PROPOSED MALUTI-A-PHOFUNG LANDFILL SITE (WML/EIA/10/2014)**

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Dear Mr Hlatshwayo

We thank you for submitting the documents for the abovementioned development project for commenting.

Please note that a Palaeontological Impact Assessment (PIA) is a standard requirement in the Free State. In this particular case we would like to emphasize that the proposed area of development falls within a highly sensitive palaeontological area and do we urge you to submit a palaeontological assessment from a suitably qualified professional at your earliest convenience.

Accordingly, herewith our comment on the Phase I Archaeological Impact Assessment compiled by Vhufa Hashu Heritage Consultants:

In terms of the Minimum Standard Guidelines for Phase I Archaeological Impact Assessments as referred to on page 2 of their report, we would like to point out that

the report does not meet the required standards in terms of the following of these guidelines. Please refer to Point 7, pages 6-11, of the attached document.

1. Point 7.1(E) – refer to comments below in this regard
2. Point 7.1(F)(a)(ii) and (iii)
3. Point 7.1(G)(a) & (b) including all sub-points of each
4. Point 7.1(H)(e)

We wish to make specific mention of the poor quality of the report in terms of the background to the archaeological history. Although we welcome all suitably qualified specialists to report on issues in the Free State, we require they should ensure that they are well acquainted with the history and geography of this province, especially the areas they report on. That is indeed the purpose for Point 7.1(E) in the document referred to above.

The Phuthaditjhaba/Witsieshoek/QuaQua area has a rich and diverse history dating as far back as the early 1800s (referring to the historical period alone) of which no mention is made in this report. Should the specialist have been aware of this, it would've resulted in social consultation with, at the minimum, the traditional leaders of various well-recorded groups in the area to ensure that development of this area does not endanger areas of cultural significance. This is of particular importance because the report claims that from an archaeological and cultural heritage resources (own emphasis) perspective, there are no objections to the proposed development.

Most of the historical references in the report refer to the southern (Xhariep district) and south-eastern (Motheo district) regions of the Free State in particular. This area under investigation is situated in the eastern Free State which reverts back to the earlier comment that specialists should ensure they are well acquainted with the geography of a province.

The vagueness of the references to the earlier archaeological periods in this report is also not conducive to good reporting. Although it is indeed good practice to provide a broader background to each specific archaeological period under discussion, it should always be done in relation to the area under investigation.

We, therefore, recommend that you request that the Archaeological Impact Assessment report be amended accordingly before the final scoping phase of this EIA process.

Should you have any further queries, please do not hesitate to contact us.

Yours faithfully



LOUDINE PHILIP
CHAIRPERSON : PERMIT COMMITTEE
HERITAGE FREE STATE