

Siyathembana Trading 293: Project Report

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**Project Name:** HIA AND BURIAL GROUND HERITAGE STUDY FOR  
SIMMER & JAKE LANDFILL, CITY OF EKURHULENI

**Department:** City of Ekurhuleni

**Focus Area:** HIA & Burial Ground Heritage

**Product/Process:** Heritage Impact Assessment, Burial Ground and Graves  
Heritage Study & Heritage Permits Applications

## Project Report

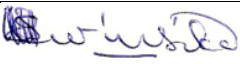
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### Project Report Version Control

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<b>PHASE</b>	<b>PROJECT REPORT ON THE ASSESSMENT OF SIMMER AND JACK BURIAL AND HIA EKURHULENI MUNICIPALITY</b>		
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## 1 PROJECT REPORT PURPOSE

### Project Report Purpose

This project Report presents results of the multi-stage Simmer and Jack Landfill Heritage Impact Assessment study covering the historic Burial Grounds and Graves HIA as well as buildings. The project site, Simmer and Jack Landfill, is an Ekurhuleni owned solid waste disposal landfill site situated on the corner of Johan and Rissik and Meade Crescent in Germiston, east of the N3 highway on portion 2 of the Elandsfontein 90IR in Primrose, Germiston, City of Ekurhuleni. The site services the southern and parts of Northern areas, notably Germiston, Bedfordview and Edenvale. The landfill is located next to the disused Simmer and Jack gold mine that was closed in 1969.

The study was conducted as part of the exercise to resolve the challenge related to the proposed expansion of the Simmer and Jack Landfill. Currently the landfill has limited airspace left of use leaving the Waste Management Services Department of CoE (City of Ekurhuleni) with problems regarding solid waste disposal processing and management for the affected service areas. It is in this context that the CoE (City of Ekurhuleni) has proposed to extend the current landfill. As part of the impact assessment study for the proposed development, a heritage and historic assessment was commissioned to assess impact of historic buildings and burial ground located on portion of proposed additional receiving area. However, the proposed extension will flow into an existing historic site dating back to pre-1887 period. The historical sites are associated with the active days of Simmer and Jack Mine operational period dating back to the early 1887s until 1969 when the mine closed.

#### **The stated aims of the project are:**

- Provision of Heritage Services – site condition survey, assess impact of the landfill development and operation on heritage resources and significance, Mapping and Reporting on heritage resources including all buildings older than 60 years that are protected by the National Heritage Resources Act (NHRA) Act 25 of 1999.
- Burial Ground and Graves Impact assessment study and Application for Exhumation and Relocation Heritage Permit to SAHRA BG&G Unit
- Historic Buildings Impact Assessment study, Site Condition Survey and Application for Destruction Heritage Permit to G-PHRA.
- Ecological Assessment for Simmer and Jack Landfill site

## 2 PROJECT REPORT GOALS

### Project Report Goals

This Project Report is filed after a series of project landmarks were achieved. From the CoE SLA with Siyathembana Pty. Ltd. and the subsequent project schedules, the following activities and deliverables were archived:

SIYATHEMBANA Pty Ltd, undertook and completed:

1. Burial Ground and Graves Impact assessment study and HIA Report produced and submitted
2. Application for Exhumation and Relocation Heritage Permit to SAHRA BG&G Unit and Permit was issued to exhume and relocate the affected burials from Simmer and Jake.
3. Historic Buildings Impact Assessment study, Site Condition Survey studies completed and reports issued.
4. Application for Destruction Heritage Permit to G-PHRA submitted and response issued to CoE.
5. Ecological Assessment for Simmer and Jack Landfill site study conducted and completed. Report issued and submitted to Ekurhuleni Waste Management for further process.

### 3 PROJECT REPORT SUMMARY

#### 3.1 Project Background Overview

##### Project Background Overview

Simmer and Jack Landfill site is an Ekurhuleni Municipality owned solid waste disposal site which is situated on the corner of Johan and Rissik and Meade Crescent in Germiston, east of the N3 highway on portion 2 of the Elandsfontein 90IR in Primrose, Germiston. The site services the southern and parts of Northern areas, notably Germiston, Bedfordview and Edenvale. The landfill is located at the disused Simmer and Jack gold mine that was closed in 1969. Portions of the historic village have since been lost prior to the development of the landfill cells in the early 1990s. The affected burial ground for which we are applying for permit to relocate is currently under the custodianship of the City of Ekurhuleni who retained our services to seek relocation of the cemetery from an active landfill site. The cemetery in question, dating from 1901 to the late 1940s, consists of burials associated with migrant labourers from across South Africa, southern Africa and probably parts of Asia such as Chinese labourers who died while working at the mine. The archival records indicate that the mine was closed in 1969, about 20 years after the cemetery was closed by the then Simmer and Jake Mine Management. No communities have lived in the area since the mine was closed. Research has failed to locate any previous residents at this mine settlement. The historic mine site has been under the local authority since and was approved for waste transfer and landfill use in the 1980s.

The development of the landfill cells from the 1992 destroyed undetermined portion of the burials. From the mid 2000s, the Ekurhuleni Metropolitan Municipality Council has been seeking to protect or rescue the burials from further destruction. All notices and request for information on potential custodians have not received any feedback since the first drive in 2007. The nearest communities are informal

settlement whose community members are also currently involved in destroying the affected graves by collecting stones from the burial ground and using them for informal building construction nearby.

Given the circumstances, and high improbability of identifying individual custodians of individual graves in the affected cemetery, we have consulted with the City of Ekurhuleni authorities as the current custodians of both the cemetery and the landfill sites and secured the city's consent to relocate the entire cemetery as a collective of graves to a secure site.

Currently the landfill has limited airspace left of use leaving the Waste Management Services Department of the City of Ekurhuleni (CoE) with problems regarding solid waste disposal processing and management for the affected service areas. It is in this context that the CoE has proposed to extend the current landfill by building an additional receiving area. However, the proposed extension will flow into an existing historic cemetery of former mine workers and portion of historic buildings on site.

CoE retained Siyathembana to conduct the necessary heritage studies for the affected burial grounds and buildings on the projects area. The stated aims of the project are:

- Assessing cultural significance of identified sites, places, buildings, structures, objectives, burial grounds, grave sites, etc. involving site inspections and establishing a broad chronology of the site through further research
- the identification and mapping of all heritage resources in the area affected;
- an assessment of the significance of such resources in terms of heritage assessment criteria set out in regulations;

an assessment of the impact of the development on heritage resources;

- an evaluation of the impact of the development on heritage resources

relative to the sustainable social and economic benefits to be derived from the development;

- the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;
- if heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and plans for mitigation of any adverse effects during and after completion of the proposed development.
- Member of the public and potential interested and affected parties were invited to comment or submit their concerns regarding the heritage site. The Simmer and Jake Mine trust was consulted. Public notices were placed on site and an advert was placed in Germiston News newspaper

### **3.2 Project Highlights and Best Practices**

#### **Project Highlights and Best Practices**



This project was conducted under the regulations, guidelines and best practice stipulated and provided for under the National Heritage Resources Act, Act 25 of 1999. The NHRA is concerned with all heritage resources, providing general protection for structures older than 60 years. Section 34 states that *No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant Provincial Heritage Resources Authority.*

The heritage fabric at the Simmer and Jack Mine is from various periods, with the oldest features being more than 100 years old since the mine opened 1887. Therefore any proposed development automatically requires an approved permit for any changes and demolition. Buildings that do not fall in the category of general protection can however, still be classed as heritage resources under Section 2 (vi) and 2 (xvi). For such resources a permit for possible demolition, alterations, additions, damage or other changes can only be granted if it does not have substantial aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance as provided for under Section 2( Vi) and 2 (xvi).

### 3.3 Project Closure Synopsis

#### Project Closure Synopsis

The final project deliverables were:

1. Burial Ground and Graves Impact Assessment study and HIA Report
2. Application for Exhumation and Relocation Heritage Permit to SAHRA BG&G Unit
3. Permit was issued to exhume and relocate the affected burials from Simmer and Jake.
4. Historic Buildings Impact Assessment study, Site Condition Survey studies completed and reports issued.
5. Application for Destruction Heritage Permit to G-PHRA submitted and response will be issued to CoE.
6. Ecological Assessment for Simmer and Jack Landfill site study conducted and completed. Report issued and submitted to Ekurhuleni Waste Management for further process.

## 4 PROJECT METRICS PERFORMANCE

### 4.1 Goals and Objectives Performance

#### Goals and Objectives Performance

The goals and objectives of the project were met. All commissioned reports were produced and submitted to the heritage authorities and the CoE client department – Waste Management.

1. The Ecology report was produced and submitted to CoE Waste Management Unit.
2. Burial Ground and Graves exhumation and relocation Permit issued by SAHRA and submitted to CoE Waste Management Unit.
3. Building HIA and Site Condition Survey Report Produces, Historic Buildings Destruction Permit Application submitted to Gauteng Provincial Heritage Resources Agency (G-PHRA) (Awaiting G-PRHA ROD)

### 4.2 Milestone and Deliverables Performance

#### Success Criteria & Milestones and Deliverables Performance

1. The Ecology report was produced and submitted to CoE Waste Management Unit.
2. Burial Ground HIA Report Produced and submitted to SAHRA BGGU and CoE Waste Management Unit.
3. Burial Ground and Graves exhumation and relocation Permit issued by SAHRA and submitted to CoE Waste Management Unit.
4. Building HIA and Site Condition Survey Report Produced and submitted to CoE Waste Management Unit.
5. Historic Buildings Destruction Permit Application submitted to Gauteng Provincial Heritage Resources Agency (G-PHRA) (received G-PRHA ROD)

### 4.3 Metrics Performance Recommendations

#### Metrics Performance Recommendations

In line with the issued permit , it is recommended that:

- Ekurhuleni should proceed to exhume and relocate the affected Simmer and Jake historic burial ground and graves to a safe site in line with the SAHRA BGG Unit Permit.
- CoE to mobilise resources to implement the ROD / Historic Buildings Permit issued by from the Gauteng Provincial Heritage Agency.

## 5 DELAY OF RELOCATION

### 5.1 Resource Management

#### Resource Management

COE is busy mobilising more financial and network resources to implement the next phases of the:

- Proposed exhumation and relocation of the Burial ground and graves from Simmer & Jake Landfill Site
- Demolition and removal of dilapidated historic buildings affected by the developments at the Simmer & Jake Landfill Site

### 5.2 Issue Management

#### Issue Management

- The critical outstanding issues will relate to seeking acceptable reburial site or mode of relocation of the affected burial ground since the City of Ekurhuleni does not have enough burial ground to re-bury the estimated hundreds of the human remains.
- A potential public interest management matter to arise relates to the handling of the affected human remains that originates from the colonial and apartheid migrant labor practices where the ceased buried on site were not all buried properly or are identifiable both in records and on site.

### 5.3 Risk Management

#### Risk Management

- The next phase faces the challenges of meeting deadlines and minimum standard as per SAHRA and G-PHRA Operational Guidelines and permit validity periods.

### 5.4 Quality Management

#### Quality Management

All draft reports and final reports that were submitted to compliance authorities were submitted to CoE Waste Management Unit. The unit subjected the draft documents to multiple reviews before the final reports were drafted and submitted to authorities.

## 5.5 Post Project Tasks

### Post Project Tasks

**The following are the outstanding issues.**

- Burial Ground and Graves Exhumation and Relocation Plan
- Historic Buildings Record of Decision and Building Management and or demolition Plan

## 5.6 Project plan and way forward

### Project Closure Recommendations

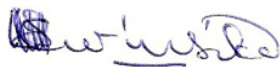
- City of Ekurhuleni (COE) to sponsor the exhumation and relocation of the affected graves and burials from Simmer and Jake Landfill. CoE in so planning and doing must take into consideration the challenge of alternative burial sites since the human remains may number into thousands requiring vast reburial space with the city may not have.
- As such, alternative burial modes such as cremation should be considered.
- Given the observation that majority of the deceased buried at the site were victims of colonial mine labour system accidents, exhuming these remains without due acknowledgement may turn out to be second victimization of the deceased.
- There is a case for the CoE to make a heritage memorial of victims of the migrant labour such those to be moved at Simmer and Jake Landfill site.
- CoE to mobilise resources for either heritage management plan or historic building demolition subject to the conditions to be issued in the G-PHRA ROD or Heritage Permit.

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## 6 PROJECT REPORT APPROVALS

**Prepared by:** M Murimbika (Ph.D.) (SIYATHEMBANA Pty. Ltd. Project Lead)

**Approved:**



**Approval Date** 22 February 2018

## **7 APPENDICES**

### **APPENDIX 1: BURIAL RELOCATION PROJECT METHOD STATEMENT**

#### **1. DISCOVERY AND NOTIFICATION**

If human burial remains are accidentally discovered during development at Simmer and Jack landfill expansion site, the following guidelines apply:

- a) The finder will immediately cease any further activity at the site and report the site to the EMM ECO. The ECO will notify the heritage expert (Archaeologist) and authorities.

#### **2. SITE PROTECTION AND IDENTIFICATION**

- a) The ECO and the Archaeologist and the permitting authority shall take reasonable measures to protect the site from environmental factors and any form of unauthorized interference or disturbance.
- b) Based on the evidence reported at the scene, the Archaeologist will investigate the site and make a preliminary determination as to the nature of the remains.
- c) Existing site inventories, land use records, and community, and authorities, should be consulted as soon as possible about possible identification of the remains. Some examination of the site/remains may be required to determine its cultural affiliation and age, and whether or not the site is modern or historic.
- d) The Archaeologist shall apply and acquire the relevant exhumation and rescue Permit from SAHRA Graves and Burial Unit.

### **3. INVESTIGATION AND REPORTING**

a) The ECO will direct the Archaeologist to carry out an investigation under any required permits, in consultation with the affected custodians (if available) and other affected parties, to make an initial report citing, if possible, the cultural affiliation of the human remains.

b) Within a reasonable time to be specified by the EO, and the affected parties, the Archaeologist shall deliver a written report and any notification not yet made, to:

- the ECO, and the affected custodians if appropriate;
- the SAHRA;
- the permitting authority of SAHRA Graves and Burials Unit
- any other representative of the interred, if known.

c) The written report shall attempt to identify:

- the representative group of the interred;
- the geographic boundaries of the site;
- the grave offerings or other heritage resources that may be associated with the remains or the site.

d) The Archaeologist may, with the agreement of the proper authority and the representative of the interred, if known, remove all or part of the human remains for temporary custody where the remains may otherwise be at risk prior to their re-burial at a safe site.

#### **3.1 REPORTING**

a) If the site is determined to be a contemporary burial site, the appropriate representative will be contacted in writing to provide further direction on the disposition of the remains.

b) EMM contractors carrying out authorized activity where a historic or archaeological burial site is discovered can continue that activity with the consent of the EO, where appropriate. The activity must stay 150 meters away from the grave while further



arrangements are made by the Archaeologist to rescue and relocate the remains to a safe cemetery.

d) The Archaeologist may publish notice of the discovery in a newspaper or other public notice seeking information on the remains and alerting members of the public about the impending relocation of the remains to a predetermined formal cemetery or burial ground.

#### **4. SITE DISPOSITION AGREEMENT (MANAGEMENT PLAN)**

4.1 When the site or remains are identified

- a) The site shall not be disturbed and the EO, if on direct path of EMM development work, shall initiate discussions towards entering into a site disposition agreement with the representative of the interred where applicable.
- b) If the site is a historic or archaeological burial site, there must be joint approval of the site management plan on reburial as stated in the scope of services in terms of contract between EMM.
- c) Decisions regarding reburial, relocation or other disposition should be determined on a case by case basis in consultation with those concerned and in a timely manner.

Site disposition agreements shall determine such things as:

1. the interim care of the human remains;
2. the scope and extent of analysis to be performed on the human remains, if any;
3. the exact location of the place where the human remains are to remain or to be interred;
4. the style and manner of disinterment, if applicable;
5. the style and manner of reinterment, if applicable;
6. the time period in which disinterment and reinterment is to take place;
7. the procedures relating to, and the final disposition of any grave offerings discovered with the human remains and any additional analysis of them;

8. the provision for future maintenance of the cemetery or site where the human remains are to be located;
9. access to the site and ways to prevent disturbance;
10. any other issue agreed upon.

#### 4.2 When no representative is identified or no disposition is specified:

If disposition is not specified by a representative, or the remains are not claimed or no affiliation is established within a reasonable time, the Archaeologist shall with the necessary SAHRA permits and approvals provide for the following disposition:

- a) cover and leave the remains where they were found and have the site recorded as a burial site/heritage site, if on land suitable for a burial site; or
- b) have the remains disinterred and reinterred in the nearest appropriate cemetery; or
- c) remove the remains from the site for analysis and may have them reinterred in a recognized cemetery or;
- d) may act as the temporary repository of the remains until they are re-located for reburial at designated cemetery.

(Where the remains were found on dam raising site but are not historic or archaeological remains, the Archaeologist may remove the remains in consultation with the EO and the affected parties.)

### 5. ARBITRATION

- a) If no disposition or reburial agreement or management plan is reached within a reasonable time the matter may be referred to arbitration for settlement.

### 6. RECORDS

- a) A record of the site and a report of the discovery and disposition plan shall be kept by the Archaeologist, for future reference to protect the site or identify the re-burial site.

- b) Access to information about discovered sites will be addressed in any site management plan developed under these guidelines, and will be protected under the Access to Information and Protection of Privacy legislations, and the NHRA.

## 7. BURIAL RELOCATION & REBURIAL

- Burial Relocation involves the identification of each grave and the manual excavation of the interred remains. Human remains, coffin features, and grave goods are exposed, their positions in the grave are carefully recorded, and maps and photographs of each grave are made following standard archaeological recovery techniques.
- Once excavation and examination are completed, the interred along with their grave goods are inventoried and carefully wrapped in acid-free tissue. Human remains are arranged anatomically and all materials are placed in specially designed containers, specified by the laws and regulations governed by the state where the re-interment location has been determined. The goal of re-interment is to restore as much of the original mortuary meaning as possible.
- Burial relocation is extremely culturally sensitive and EMM and contractors/service provider staff understands that the utmost respect must be shown to the interred, as well as the descendant communities. We advocate respectful involvement of descendent communities in the relocation process, whenever possible, and have an excellent reputation for communicating with descendant groups.
- Siyathembana Trading has extensive experience conducting cemetery relocations for government agencies, other cultural resource firms, developers and private citizens in South Africa. We assure our clients as well as the descendent communities that the greatest amount of respect and care is taken when excavating and relocating these cemeteries.

## 8. RISKS

### 1. Legal Risks

EMM is exposed to a myriad of legal requirements on the local and national level when having to relocate burials. Burial relocation can infringe a number of human rights enshrined in the Constitution and legislations such the NHRA. If not carried out properly, grave relocation can impact the right to burial and dignity. Community opposition may result in protests and delays on development.

#### Mitigation

When human remains are identified during the development, all measures must be taken to ensure the law and applicable regulations are enforced including mandatory public notifications.

### 2. Reputational risk

Relocation of human burials in particular also brings with it high risks for the EMM's reputation which is exacerbated by the instantaneous spread of news across the world via the internet. Lack of proper planning and management may lead to negative consequences, which in turn may affect the EMM reputation.

#### Mitigation

Human remains identified in development contexts should be handled with utter most care to ensure the exhumation and relocation takes place in accordance with the law.

### 3. Operational risks

Legal action arising from the inadequate planning and implementation of burial relocation may result in EMM permission to expand the Landfill via preliminary injunctions.

Operational risks may also arise from community protests directly. Cases of community opposition and protests, has previously disrupted work for days and weeks, involving,

for example, the blockage of construction sites and vital roads and infrastructure.

Construction may be delayed or disrupted.

Protests may be violent and impact on the health and safety of EMM staff perpetuating work delays in construction and operations. EMM facilities, machinery, housing and other assets may be damaged and rendered unusable.

### Mitigation

Simmer and Jack Landfill project site should have adequate security. All burials related matters should be held by the professional heritage team and reburial specialists.

Human remains discovered during development should be reported to the ECO urgently and the Archaeologist notified in time to avoid any delays with the remains exposed on site. All exhumations and reburial exercises should be handled or schedule in a manner that does not require the remains to be held elsewhere temporarily.

### 4. Financial risks

Legal, reputational and operational risks may also lead other financial costs to the project. Moreover, costs may arise from legal action or disruptions in operations and work delays. Additional costs may be incurred when public protests require work to stop on site as a result of human remains discovery on site.

### 5. Human Remains Handling Risks

Exhumation, handling, transportation and reburial of human remains also pose a threat to public health if not handled to strict protocols. This risk is particularly highest in contemporary burials.

