

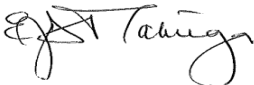


Heritage Impact Assessment for the proposed Bethal – Emzinoni 88kV Powerline and 40MVA Substation

Sunday, 13 March 2022

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DECLARATION OF INDEPENDENCE

We hereby declare that we have no interest, be it business, financial, personal or other vested interest in the undertaking of the proposed activity, other than fair remuneration for work performed, in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999).

DISCLAIMER

All possible care was taken to identify and document heritage resources during the survey in accordance with best practices in archaeology and heritage management. However, it is always possible that some hidden or subterranean sites are overlooked during a survey. The researcher will not be held liable for such oversights and additional costs thereof.

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Title / Position: Principal Researcher

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EXECUTIVE SUMMARY

1. This document is a Heritage Impact Assessment (HIA) prepared to fulfil the requirements of Section 38(8) of the National Heritage Resources Act (25 of 1999) (NHRA) for the proposed construction of a 38kV powerline from an existing substation situated on the northern outskirts of Bethal to a substation to be built at Emzinoni Township south of Bethal.
2. An HIA is based on an understanding of heritage significance, and if heritage is found in the area of the proposed development, mitigation options are considered and recommendations made on a conservation strategy that best protects the resources within the context of the proposed development.
3. A ground survey was conducted on 7 February 2022 and the following is a summary of the study:
4. The heritage sensitivity of the property is summarised as follows:
 5. *The Stone Age*
No Stone Age sites or relics were found.
 6. *The Iron Age*
No Iron Age sites or relics were found.
 7. *Buildings*
There are no buildings in the servitude of the proposed power line.
 8. *Burial Ground*
 9. There is large cemetery on the eastern outskirts of Emzinoni Township in which there are thousands of grave. The buffer separating the graves from the proposed substation is estimated to be more than 200 m which is twice the minimum breadth of the servitude regulated. It is also noted that the R35 Road from Bethal to Mogenzon which passes between the cemetery and the proposed substation site will act as a buffer as the development of the substation east of the road will not encroach into the buffer zone.
 10. *Mitigation for the burial ground*
All feeder lines from the substation to Emzinoni Township and supporting infrastructure must avoid the cemetery with the application of a 100 m buffer zone as a minimum standard. The developer must be informed about this regulation before the location of the substation is confirmed.
 11. *Conclusion and recommendations*
The project must be allowed to go ahead with the following recommendation being made:
All feeder lines from the substation at Emzinoni into the township and other supporting infrastructure must avoid the cemetery with the application of a 100 m buffer zone as a

minimum standard. The developer must be informed about this regulation before the location of the substation is confirmed.

GLOSSARY

Archaeology: The study of the humans' past through their material remains.

Archaeological material: remains resulting from human activity left as evidence of their presence which, as proscribed by South African heritage legislation, are older than 100 years, which are in the form of artefacts, food remains and other traces such as rock paintings or engravings, burials, fireplaces and structures.

Artefact/ Ecofact: Any movable object that has been used, modified or manufactured by humans.

Assemblage: A group of artefacts recurring together at a particular time and place, and representing the sum of human activities.

Catalogue: An inventory or register of artefacts and/or sites.

Conservation: All the processes of looking after a site/heritage place or landscape including maintenance, preservation, restoration, reconstruction and adaptation.

Culture: A contested term, "culture" could minimally be defined as the learned and shared things that people have, do and think.

Cultural Heritage Resources: refers to physical cultural properties such as archaeological sites, palaeontological sites, historic and prehistorical places, buildings, structures and material remains, cultural sites such as places of rituals, burial sites or graves and their associated materials, geological or natural features of cultural importance or scientific significance. This include intangible resources such religion practices, ritual ceremonies, oral histories, memories indigenous knowledge.

Cultural landscape: "the combined works of nature and man" and demonstrate "the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both internal and external".

Cultural Significance: is the aesthetic, historical, scientific and social value for past, present and future generations.

Early Stone Age: Predominantly the Oldowan and Acheulean hand axe industry complex dating to ± 2.6 Myrs – 250 000 yrs. before present.

Early Iron Age: Refers cultural period of the first millennium AD associated with the introduction of metallurgy and agriculture in Eastern and Southern Africa

Later Iron Age: Refers to the period after 1000AD marked by increasing social and political complexity. Evidence of economic wealth through trade and livestock keeping especially cattle

Excavation: A method in which archaeological materials are extracted, involving systematic recovery of archaeological remains and their context by removing soil and any other material covering them.

Grave: a place of burial which include materials such as tombstone or other marker such as cross etc.

Historic material: means remains resulting from human activities, which are younger than 100 years and no longer in use, which include artefacts, human remains and artificial features and structures.

Intangible heritage: Something of cultural value that is not primarily expressed in a material form e.g. rituals, knowledge systems, oral traditions, transmitted between people and within communities.

Historical archaeology: the study of material remains from both the remote and recent past in relationship to documentary history and the stratigraphy of the ground in which they are found; or archaeological investigation on sites of the historic period. In South Africa it refers to the immediate pre-colonial period, contact with European colonists and the modern industrial period.

In situ material: means material culture and surrounding deposits in their original location and context, for instance archaeological remains that have not been disturbed.

Later Iron Age: The period from the beginning of the 2nd millennium AD marked by the emergence of complex state society and long-distance trade contacts.

Late Stone Age: The period from ± 30 000-yr. to the introduction of metals and farming technology

Middle Stone Age: Various stone using industries dating from ± 250 000 yr. - 30 000 yrs. ago

Monuments: architectural works, buildings, sites, sculpture, elements or structures of an archaeological nature, inscriptions, cave dwellings which are outstanding from the point of view of history, art and science.

Place: means site, area, building or other work, group of buildings or other works, together with pertinent contents, surroundings and historical and archaeological deposits.

Preservation: means protecting and maintaining the fabric of a place in its existing state and retarding deterioration or change, and may include stabilization where necessary.

Sherd: ceramic fragment.

Significance grading: Grading of sites or artefacts according to their historical, cultural or scientific value.

Site: a spatial cluster of artefacts, structures, organic and environmental remains, as residues of past human activity.

Site Recoding Template: Site recording form.

1. INTRODUCTION

This Heritage Impact Assessment (HIA) report has been prepared to fulfil the requirements of Section 38(8) of the National Heritage Resources Act (25 of 1999) (NHRA) for the proposed construction of a 38kV powerline from an existing substation situated on the northern outskirts of Bethal to a substation to be built at Emzinoni Township south of Bethal. An HIA is based on an understanding of heritage significance, and if heritage is found in the area of the proposed development, mitigation options are considered and recommendations made on a conservation strategy that best protects the resources within the context of the proposed development.

Location and Physical Setting

Setting out from the existing substation the proposed line will be laid within an existing servitude trending east beyond the limits of the built area. After 3 km the line will make a right-angle turn south traversing grazing land, and crossing the Bleksbokspruit which is flanked by a wetland. A few hundred metres before an isolated lodge, the line makes a wide angle turn southeast still skirting the built-up area, and crosses the N17 before its terminal point where a new substation will be construction for the augmentation of power supply in Emzinoni Township.

Bethal is situated on the eastern Highveld, the eastern part of the plateau which rises from the Drakensberg escarpment. This is a watershed sitting between streams that feed into the Vaal River to the South and those that in the Olifants River basin which is part of the Limpopo Basin. The area is characterised by rolling plains covered with Savana grass. Woodland cover tended to be confined to sheltered river valleys.

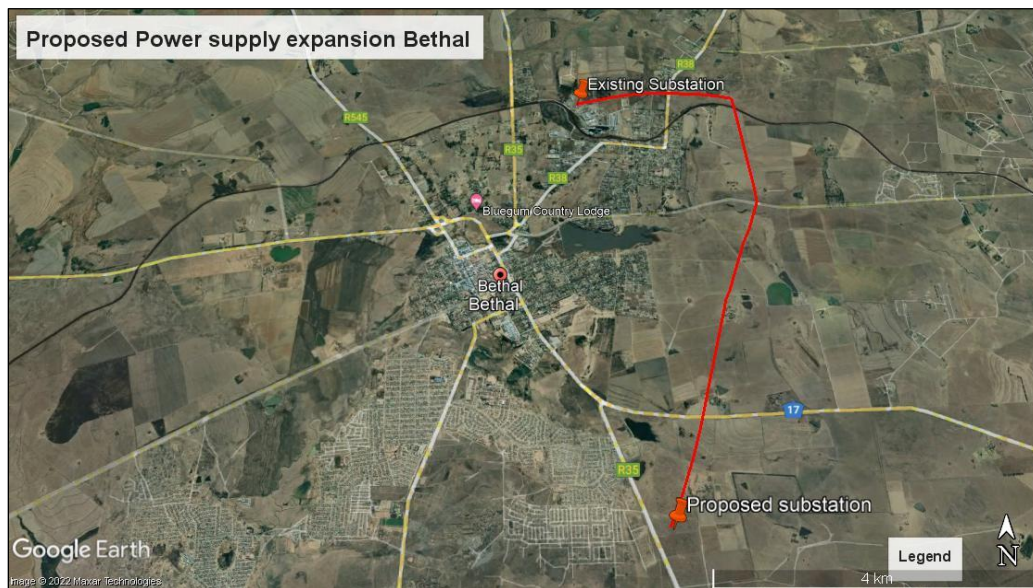


Figure 1: Google Earth map shows the route of the proposed powerline and the location of the substation near Emzinoni Township in Bethal.



Figure 2: Power will be drawn from an existing substation on the northern outskirts of Bethal



Figure 3: The line follows an existing powerline servitude trending west-east on the northern outskirts of Bethal. This photo was taken from the point where the line crosses the R38 Rd from Bethal to Hendrina



Figure 4: View east from the R38 Rd shows the powerline servitude



Figure 5. View north from the edge of the wetland flanking the Blesbokspruit on the eastern outskirts of Bethal (new servitude)



Figure 6: The powerline crosses the wetland and Blesbokspruit



Figure 7: View north of the powerline route from the site of the proposed substation on the outskirts of Emzinoni Township



Figure 8: View west of the Emzinoni Township in the background and the cemetery in the foreground



Figure 8: Emzinoni cemetery

2. NATURE OF PROPOSED DEVELOPMENT

The project entails the following:

- Clearance of vegetation along the powerline route and servitude
- Excavations for the construction of transmission of towers
- Clearance for the placement of temporary offices and labour camps
- Construction of temporary roads

3. LEGAL FRAMEWORK

A Heritage Impact Assessment is governed by the NHRA and of particular relevant application are Sections 38, 34, 35, and 36. In this instance it is necessary to provide details of the legal provisions.

3.1. Heritage Impact Assessment

Section 38 of the NHRA specifies the nature and scale of development projects which require a Heritage Impact Assessment as mitigation:

38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as—

(a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;

(b) the construction of a bridge or similar structure exceeding 50m in length;

(c) any development or other activity which will change the character of a site—

(i) exceeding 5 000m² in extent; or

(ii) involving three or more existing erven or subdivisions thereof; or

(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or

(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;

(d) the re-zoning of a site exceeding 10 000 m² in extent; or

(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority.

An Impact assessment is necessary in view of the distance threshold set in Section 38(1)(a).

3.2. Protection of Historic Buildings

Section 34 of the NHRA provides for automatic provisional protection of all structures/buildings and features older than 60 years unless proof can be furnished that they do not carry heritage value.

3.3. Protection of Archaeological and Palaeontological Sites

Section 35 (4) of the NHRA prohibits the destruction of archaeological, palaeontological and meteorite sites. A palaeontological desktop survey was undertaken and a report is appended to the heritage report.

3.4. Protection of Graves and Burial Grounds

Section 36 of the NHRA gives priority for the protection of Graves and Burial Grounds of victims of conflict and graves and burial grounds more than 60 years old. Within this frame cautious approaches are considered including managed exhumations and re-interment to pave way for development.

. Graves are generally classified under the following categories:

- Graves younger than 60 years;
- Graves older than 60 years, but younger than 100 years;
- Graves older than 100 years; and
- Graves of victims of conflict
- Graves of individuals of royal descent
- Graves that have been specified as important by the Ministers of Arts and Culture.

This study is however mindful of public sensibilities about the sanctity of graves and burial grounds whether they are protected by the law or not.

The **World Archaeological Congress (WAC)** has set international ethical standards for the treatment of human remains. In 1989 the WAC Inter-Congress in South Dakota (USA) adopted the **Vermillion Accord on Human Remains**. Accordingly respect for the mortal remains of the dead shall be accorded to all, irrespective of origin, race, religion, nationality, custom and tradition.

3.5. The National Environmental Management Act (No 107 / 1998)

This act states that a survey and evaluation of cultural resources must be done in areas where development projects that will affect the environment will be undertaken. The impact of the development on these resources should be determined and proposals for the mitigation thereof are made. Environmental management is a much broader undertaking to cater for cultural and social needs of people. Any disturbance of landscapes and sites that constitute the nation's cultural heritage should

be avoided as far as possible and where this is not possible the disturbance should be minimized and remedied.

3.6. The Burra Charter on Conservation of Places of Cultural Significance

Some generic principles and standards for the protection of heritage resources in South Africa are drawn from international charters and conventions. In particular South Africa has adopted the **Australia Charter for the Conservation of Places of Cultural Significance (the Burra Charter 1999)** as a benchmark best practice in heritage management.

4. APPROACH AND METHODOLOGY

International best practice in archaeology and heritage management underpin our theoretical approach and methodology. The following tasks define the streams of work which were undertaken:

4.1. Literature Study

A desktop study means a literature review which is critical in all types of research in order to provide an initial understanding of a subject or situation, identify potential risks and inform the detail, scope and methodology of subsequent investigations. To build context a variety of data is needed, including physical and human geography, as well as archaeology and history. Documentary analysis encompassed a wide range of sources including books, reports, articles, and previous impact assessments in the broader area. The internet is an important portal for accessing reports of previous research in the broader area. In particular heritage impact assessment reports are published on the SAHRIS platform managed by the South African Resources Agency (SAHRA). An outline of the cultural sequence in South Africa based on available literature provided context for the identification of heritage resources in the study area.

Coetzee, F. 2017. *Cultural Heritage Impact Assessment: Phase 1 Investigation for a Proposed Extension of Pit 1 and Pipeline from Dorstfontein West to Dorstfontein East and the Disposal of Discard into the Opencast Pit, north east of Kriel, eMalaheni Local Municipality, Nkangala District Municipality, Mpumalanga.*

No Stone Age or Iron Age settlements, structures, features, assemblages or artefacts were recorded during the survey. Four graveyards were recorded and a number of farmhouses were recognised for the architectural and historical value (page 2).

Coetzee, T. 2018. *Phase 1 archaeological impact assessment for the proposed tala Bethal Coal project between Hendrina and Bethal, Mpumalanga*

No material dating to the Stone Age or Iron Age were found. Remains of buildings of a relatively recent date were considered of low significance.

Gaigher, S. 2011. *First Phase Heritage Impact Assessment for the Proposed Extension to the Camden Ash Disposal Facilities.* Gaigher noted the built environment including the Camden Power Plant itself dominated by the three cooling towers. No sites of archaeological or historical significance were found.

Hussain, Z & J Bedford-Owen. 2014. *Final Scoping Report for the Proposed Block Z Project at Isibonelo colliery (MDEDET Reference: 17/2/3N-362) Anglo Operations Limited.*

No Stone Age or Iron Age sites were recorded during the site. A burial ground with 9 graves was reported in an adjacent area (page 91).

Schalkwyk, J. 2014. *Cultural Heritage Impact Assessment for the Proposed Swaziland Rail Link, Western Section, Mpumalanga Region.* In this study a number of buildings and historical structures of the modern industrial age were recorded as significant.

Van Vollenhoven, A, C, 2016. *A Report on a Heritage Impact Assessment for the Schurvekop Coal Mine Project near Bethal in the Mpumalanga Province.*

No Stone Age or Iron Age settlements, structures, features, assemblages or artefacts were recorded during the survey. Four grave sites were recorded (Page 5).

4.2. Ground Survey

A ground survey was conducted on 7 February 2022 with the aim to locate and document heritage elements of the receiving environment. A ground survey is a systematic procedure for the identification and documentation of archaeological, historical and heritage sites. Systematic foot surveys were combined with windscreen survey with the aid of a vehicle.

4.3. Ranking of Finds

The Table below is used for ranking the significance of the findings.

	RANKING	TOPOLOGY AND SIGNIFICANCE	NO OF SITES
1	High	National and Provincial heritage sites (Section 7 of NHRA). All burials including those protected under Section 36 of NHRA. They must be protected.	
2	Medium A	Substantial archaeological deposits, buildings protected under Section 34 of NHRA. Footprint of early modern mining. These may be protected at the recommendations of a heritage expert.	
3	Medium B	Sites exhibiting archaeological characteristics of the area, but do not warrant further action after they have been documented.	
4	Low	Heritage sites which have been recorded, but considered of minor value relative to the proposed development.	
		TOTAL	

4.4. Limitations of the study

Ground visibility was poor due to cover of thick summer grass.

5. ARCHAEOLOGICAL AND HISTORICAL CONTEXT

The cultural sequence in South Africa begins with the Stone Age and spans nearly 4 million years. The cultural sequence has specific attributes or identifiers that we look for in an HIA such as stone tools (Stone Age) and pottery and metal implements (Iron Age).

5.1. Cultural Sequence Summary

Table 1: Cultural Sequence Summary

PERIOD	EPOCH	ASSOCIATED CULTURAL GROUPS	TYPICAL MATERIAL EXPRESSIONS
Early Stone Age 2.5m – 250 000 YCE	Pleistocene	Early Hominids: <i>Australopithecines</i> <i>Homo habilis</i> <i>Homo erectus</i>	Typically large stone tools such as hand axes, choppers and cleavers.
Middle Stone Age 250 000 – 25 000 YCE	Pleistocene	First <i>Homo sapiens</i> species	Typically smaller stone tools such as scrapers, blades and points.
Late Stone Age 20 000 BC – present	Pleistocene / Holocene	<i>Homo sapiens</i> including San people	Typically small to minute stone tools such as arrow heads, points and bladelets.
Early Iron Age / Early Farmer Period c300 – 900 AD (or earlier)	Holocene	Iron Age Farmers	Typically distinct ceramics, bead ware, iron objects, grinding stones.
Ntshekane Facies (950 to 1050 AD)	Holocene	Iron Age Farmers, emergence of complex state systems	Typically distinct ceramics, evidence of long-distance trade and contacts
Blackburn Facies	1050 – 700AD		Defined by ceramics
Moor Park Facies	1350 – 700AD		Defined by ceramics
(ii) Historical period	Nguni / Sotho people	Iron Age Farmers	Mfecance / Difaqane

(iii) Colonial period	19 th Century	European settlers / farmers / missionaries / industrialisation	Buildings, Missions, Mines, metals, glass, ceramics
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5.2. Hominids

South Africa's human history and heritage span more than 3 million years. The stage is set with the appearance of hominids in the proto-Stone Age era. Hominid sites and their fossil remains are found in limestone caves on the highveld in Gauteng, Limpopo and Northwest Provinces.¹ Hominid refers to primate species which are the immediate ancestors of man. These sites in the Sterkfontein Caves, Makapansgat and Taung respectively have been inscribed on the UNESCO World Heritage List in a serial nomination.

5.3. The Stone Age

5.3.1. Early Stone Age [c. 2 million – 250 000 yrs BP]

The Early Stone Age marks the earliest appearance of stone artefacts about 1.4 million years ago. Such tools bore a consistent shape such as the pear-shaped handaxe, cleavers and core tools (Deacon & Deacon, 1999). These tools, which have been called Acheulian after a site in France, were probably used to butcher large animals such as elephants, rhinoceros and hippopotamus. Acheulian artefacts are usually found near sites where they were manufactured and thus in close proximity to the raw material or at butchering sites. The early hunters are classified as hominids meaning that they had not evolved to the present human form. No ESA sites have been recorded in around Ermelo (Gaigher 2011, p7).

5.3.2. Middle Stone Age (MSA) [250 000yrs – 40 000yrs BP]

The Middle Stone Age (MSA), which appeared 200 000 years ago, is marked by the introduction of a new tool kit which included prepared cores, parallel-sided blades and triangular points hafted to make spears. By then humans had become skilful hunters, especially of large grazers such as wildebeest, hartebeest and eland. It is also believed that by then, humans had evolved significantly to become anatomically modern. Caves were used for shelter suggesting permanent or semi-permanent settlement. Furthermore, there is archaeological evidence from some of the caves indicating that people had mastered the art of making fire. These were two remarkable steps in human cultural advancement.²

¹ Deacon, J. and N. Lancaster. 1986. *Later Quaternary Palaeo-environments of Southern Africa*. Oxford: Oxford University Press.

² Deacon, J & H. Deacon. 1999. *Human Beginnings in South Africa*. Cape Town: David Philip.

5.3.3. Later Stone Age (LSA) [40 000 yrs to c. 2000 yrs BP]

By the beginning of the LSA, humans are classified as *Homo sapiens* which refer to the modern physical form and thinking capabilities. Several behavioural traits are exhibited, such as rock art and purposeful burials with ornaments, became a regular practice. The practitioners of the rock art are definitely the ancestors of the San and sites abound in the whole of Southern Africa. LSA technology is characterised by microlithic scrapers and segments made from very fine-grained rock. Spear hunting continued, but LSA people also hunted small game with bows and poisoned arrows. Because of poor preservation, open sites become of less value compared to rock shelters.

5.4. The Iron Age Culture [ca 2000 years BP]

5.4.1. Early Iron Age Culture

The Iron Age culture, which supplanted the Stone Age at least 2000 years ago, is associated with the introduction of farming and the use of several metals and pottery, with one of the oldest better-known sites at Silver Leaves south east of Tzaneen dating to AD 270.³

Popular theory tends to see rapid north-south movement of speakers of Bantu languages into eastern and southern Africa from a hypothetical source in West Africa.⁴ The concept of migration itself has been vehemently questioned, since these people are indigenous to Africa. An alternative position is in favour of a gradual “expansion” or “spread” theory (rather than a migration in the strict sense). Pottery classification has been used to characterize and identify archaeological traditions within the broad Iron-using culture and to further isolate geographical variations, which have been called *facies*.⁵

Metal working represented a new technology not found among the Stone Age hunters.

As mixed farmers, iron-using peoples practiced agriculture and kept domestic animals such as cattle, sheep, goat and chicken amongst others. There is however increasing evidence that sheep might have moved into the area much earlier than the Iron Age.

According to Huffman (2007) there were two streams of Early Iron Age (EIA) expansion converging in South Africa, one originating in eastern Africa which has been called the *Urewe-Kwale Tradition* (or the

³ Schalkwyk, J. 2014. Cultural Heritage Impact Assessment for the Proposed Swaziland Rail Link, Western Section, Mpumalanga Region. p13.

⁴ Phillipson, D. W. 2005. *African Archaeology*. Cambridge: University of Cambridge Press. p249.

⁵ Evers, T. M. 1988. *Recognition of Groups in the Iron Age of Southern Africa*. Unpublished PhD Thesis, University of Witwatersrand. Huffman 2007. *A Handbook on the Iron Age*. Scottsville: UKZN Press

eastern stream) and another from the west, spreading through Zambia and Angola, which he termed the *Kalundu Tradition* (or western stream).

5.5. The Mfecane (the upheavals)

The Mfecane triggered migrations culminating in the establishment of the Swati Kingdom in present day eSwatini, formerly the Kingdom of Swaziland (east of the study area). Historically the area is home to the Swati with their territory contiguous with present day eSwatini. It is believed that Mzilikazi's Ndebele passed through the region of Ermelo and Carolina in their great flight from the reach of Tshaka's *impis* following the historic fallout around 1820/1821. Sotho Speakers were located to the south and west. The Ndebele of Ndzundza occupied territory to the north with a wedge extending to present day Leandra, Secunda and Bethal.

5.5. The Potato boycott 1959

The potato boycott, June to September 1959, was sparked by the brutal treatment of workers on potato farms around Bethal. The expose was made by Ruth First, Michael Scott and Henry Nxumalo, which Gert Sibande a trade union was in the vanguard of organising the boycott. Farmers targeted pass law offenders including young people who were recruited to the farms to work without pay and lived in subhuman conditions. The boycott was one in a series of boycotts since the launch of the defiance campaign in 1952.

Many of the farmers compelled their workers to dig up the potato harvest with their bare hands, and those who could not keep up, or became exhausted, were beaten unmercifully. The men and women who died, either from the beatings or the cruel manual labour, were mostly buried out in the open fields, with members of their own families sometimes having to load their bodies into the earth.

The consumer boycotts in South Africa gained international attention from anti-apartheid groups in Britain, Canada, Australia and New Zealand who also started boycotting Rembrandt cigarette products.⁶

5.6. Brief History of Bethal

Bethal was found in 1880 and the major attraction was stream, the Blesbokspruit, where a farms of the same name had been established. The Potato Boycott and the human rights scandal it caused cast a shadow in the history of the town. The black township of Emzinoni was an active theatre of the struggle in the 1980s and from 1990 in the runup to the first democratic elections in 1994. A number safe house of struggle activists were recorded in a previous heritage study (Khensani Heritage Consulting 2009).

⁶ South African potato boycott. Found at: https://en.wikipedia.org/wiki/South_African_potato_boycott March 2022.

The bronze statue of the MK heroine Nokuthula Simelane is located in the Bethal CBD (Figure).

Nokuthula Simelane was born near Bethal, joined the MK as a courier while studying at the University of Swaziland in the early 1980s. In 1983 she set out on a mission to South Africa on the pretext of purchasing clothing for her up-coming graduation. Simelane was however abducted, and has since not been heard from nor has her body been found.⁷ In 2016 four former apartheid-era policemen went on trial today for the murder of Nokuthula Simelane. The allegation were that Simelane was abducted and tortured in 1983. The four concede that they arrested and detained her for three weeks. After being repeatedly assaulted she was then recruited by the security police and dropped off close to the Swaziland border.⁸



Figure 9: Photograph of Nokhutula Simelane Memorial by David Goldblatt, 2013⁹

⁷ Unfinished lives: The biographies of Nokuthula Simelane. Found at: <http://etd.uwc.ac.za/xmlui/handle/11394/6246>

⁸ Apartheid-era Policemen to go on Trial over Nokuthula Simelane's Disappearance. Found at: <https://ewn.co.za/2016/07/25/Apartheid-era-policemen-to-go-on-trial-over-Nokuthula-Simelane-disappearance>

⁹ Memorial to Nokuthula Simelane. Found at: <https://www.sahistory.org.za/node/122949>

6. FINDINGS OF THE SURVEY

The heritage sensitivity of the property is summarised as follows:

6.1. The Stone Age

No Stone Age sites or relics were found.

6.2. The Iron Age

No Iron Age sites or relics were found.

6.3. Buildings

There are no buildings in the servitude of the proposed power line.

6.5. Burial Ground

There is large cemetery on the eastern outskirts of Emzisoni Township in which there are thousands of grave. The buffer separating the graves from the proposed substation is estimated to be more than 200 m which is twice the minimum breadth of the servitude regulated. It is also noted that the R35 Road from Bethal to Mogenzon which passes between the cemetery and the proposed substation site will act as a buffer as the development of the substation east of the road will not encroach into the buffer zone.

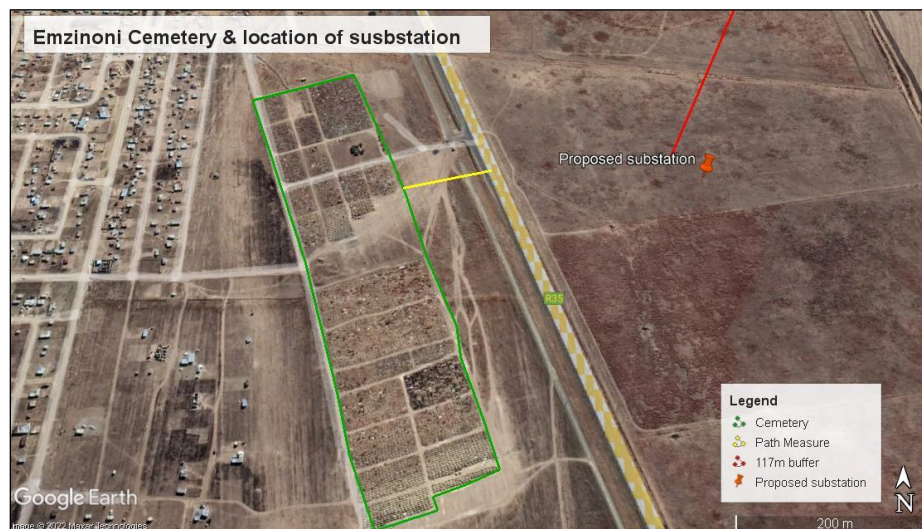


Figure 10: Google Earth Map of Emzisoni Cemetery

6.5.1. Mitigation for the burial ground

All feeder lines from the substation to Emzisoni Township and supporting infrastructure must avoid the cemetery with the application of a 100 m buffer zone as a minimum standard. The developer must be informed about this regulation before the location of the substation is confirmed.

7. CONCLUSION AND RECOMMENDATIONS

The project must be allowed to go ahead with the following recommendation being made:

All feeder lines from the substation at Emzisoni into the township and other supporting infrastructure must avoid the cemetery with the application of a 100 m buffer zone as a minimum

standard. The developer must be informed about this regulation before the location of the substation is confirmed.

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