



7 December 2021

South African Heritage Resources Agency

111 Harrington Street, Cape Town

P.O Box 4637, Cape Town, 8001

**Attention:** Elijah Dumisani Katsetse

**Tel:** 0214624502

**Email:** ekatsetse@sahra.org.za

**RE: INTERIM COMMENT IN TERMS OF SECTION 38(3) OF THE NHRA (ACT 25 OF 1999)  
ON THE S24G RECTIFICATION APPLICATION FOR HENWIL CHICKENS (PTY) LTD  
(CaseID: 16876)**

Good day,

This letter is drafted as a response to the interim comment for the attention of Henwil Chickens dated 12 September and received via email notification from the online system on 4 November 2021.

**Comment:**

The SAHRA APM Unit acknowledges receipt your S24G rectification application and request that the following is undertaken in terms of section 38(3) of the National Heritage Resources Act (25 of 1999) as part of the EA application process.

The proposed development has the potential and may have possibly impacted negatively on heritage and/or cultural resources, therefore a heritage impact assessment must be conducted. A field-based assessment of the impact to archaeological resources must be conducted by a qualified archaeologist. The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Archaeological

Director: Salome Beeslaar

Environmental assessment practitioner: Chris Delport

Telephone: 012 361 9970, Facsimile: 012 361 0645

Email: salome@becsenv.co.za, miles@becsenv.co.za, chris@becsenv.co.za



Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified archaeologist should they deem it appropriate.

**Response:**

It must be noted that the expansion activity for which this application is made (the addition of a cooker) took place on foundations which have been in place since approximately 2003, if not earlier (using google earth imagery). The disturbances associated with the construction of the original foundations had thus already taken place prior to 2003 and is not considered as part of the activities. The red area indicates the rendering facility, which is area considered for the section 24G rectification.

Refer to the google earth images below for the development footprint in 2003 and the development footprint in 2021. No other **listed activities**, which trigger an EIA or BA have taken place, as far as the EAP is aware. Considering this, it is envisaged that no significant negative impacts have occurred on heritage and/or cultural resources of the region due to the activities at the abattoir.



**2003 GOOGLE EARTH IMAGERY**

Director: Salome Beeslaar  
Environmental assessment practitioner: Chris Delport  
Telephone: 012 361 9970, Facsimile: 012 361 0645  
Email: salome@becsenv.co.za, miles@becsenv.co.za, chris@becsenv.co.za





## 2021 GOOGLE EARTH IMAGERY

Director: Salome Beeslaar  
Environmental assessment practitioner: Chris Delport  
Telephone: 012 361 9970, Facsimile: 012 361 0645  
Email: salome@becsenv.co.za, miles@becsenv.co.za, chris@becsenv.co.za



**Comment:**

The proposed development is largely located in an area of moderate palaeosensitivity to the east and a small portion of low palaeosensitivity to the west. Therefore, a desktop Palaeontological Impact Assessment (PIA) must be undertaken to assess the potential impact of the proposed development of Palaeo-Heritage. The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified archaeologist should they deem it appropriate. Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

**Response:**

As mentioned above, the existing development has been in place since approximately 2003 and is thus not likely to have made any new impact on cultural and or heritage resources of the area.

Regards,

7 December 2021

Chris Delport | Environmental Assessment Practitioner