Archaetnos



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To whom it may concern

LETTER FOR HIA EXEMPTION REQUEST: PROPOSED EXPANSION OF A FEEDLOT FOR CATTLE ON PORTION 4 OF THE FARM VLAKNEK 472 JP, DITSOBOTLA LOCAL MUNICIPALITY, NORTH WEST PROVINCE

The above-mentioned project refers. Hydro Science was appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the Environmental Impact Assessment (EIA) for the proposed development. They have appointed Archaetnos CC to do a heritage exemption application.

The proposed project is located on Portion 4 of the farm Vlaknek 472 JP, Ditsobotla Local Municipality, North West Province. The said property is located towards the south west of the town of Koster (Figure 1-4).



Figure 1: Location of Koster in the North West Province.

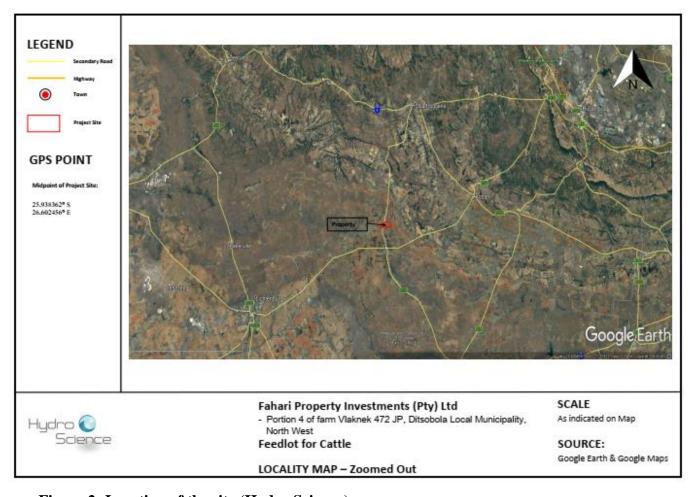


Figure 2: Location of the site (Hydro Science).

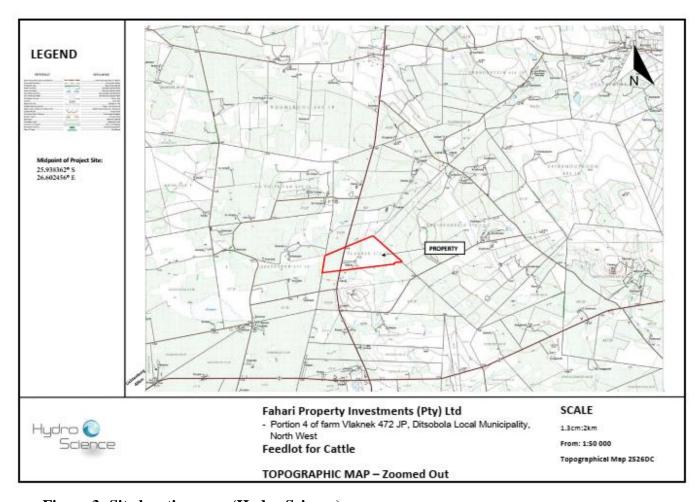


Figure 3: Site location map (Hydro Science).

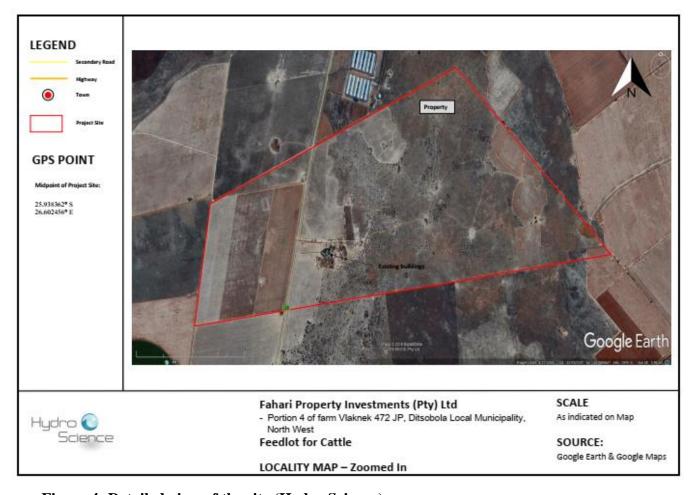


Figure 4: Detailed view of the site (Hydro Science).

A feedlot is a type of animal feeding operation, which is used in intensive animal farming for finishing livestock such as cattle, prior to slaughter. A small feedlot (300 - 500 cattle) currently exists on the property and the owner wants to expand the existing feedlot and operate it to accommodate 5 000 cattle (Government Notice Regulation (GNR) 983 of 4 December 2014 as amended in 2017 in GNR 327, Activity 39). In order to expand the feedlot, an area of more than 300m^2 of indigenous vegetation will be cleared in an area classified as a Critical Biodiversity Area (CBA) 1 and Ecological Support Area (ESA) 1 in certain sections (GNR 985 of 4 December 2014 as amended in 2017 in GNR 324, Activity 12). Each head of cattle requires 10m^2 , therefore the expansion will be $\pm 45~000\text{m}^2$ with 200 head of cattle / kraal.

The R53 cuts through the property and the portion of the property to the west of the R53 is used for maize farming. The borehole, which supplies water to the farm and operations, is also located west of the R53. Cattle require 7 litres of water / head of cattle / day. All other structures and operations, including the existing feedlot, are located east of the R53.

There are no wastewater dams and dry manure is used for fertilizing agricultural fields and donated for garden fertilizing (high demand). There are therefore limited quantities of manure on

site. Except for the feedlot no further structures will be built and existing farm structures (house, workers accommodation, stores, workshop etc.) will remain.



Figure 5: Location of the proposed feedlot on the farm.

It is my opinion that the project may be exempted from doing a Heritage Impact Assessment (HIA). The following is applicable:

- The section of land on which the feedlot is planned, is entirely disturbed and consist of almost no vegetation (Figure 5).
- All existing buildings and structures on the site is less than 60 years of age (Figure 6-7). These will not be impacted on by the development.
- It is clear that the site had been extensively disturbed due to infrastructure for either agricultural purposes, the current feedlot and associated buildings (Figure 7-10).
- The remaining vegetation is low and mainly consist of pioneer species (Figure 8, 11-12).

- Open areas, cleared from vegetation is present (Figure 8, 11-12).
- Alien trees were planted previously in certain sections

Due to the mentioned factors, the chances therefore of finding any heritage related features are indeed extremely slim. It is therefore believed that an additional Heritage Impact Assessment (HIA) is not needed for this project. This letter serves as an exemption request to the relevant heritage authority.

The developer should however note that due to the nature of archaeological material, such sites, objects or features, as well as graves and burials may be uncovered during construction activities on site. In such a case work should cease immediately and an archaeologist should be contacted as a matter of urgency to assess such occurrences.

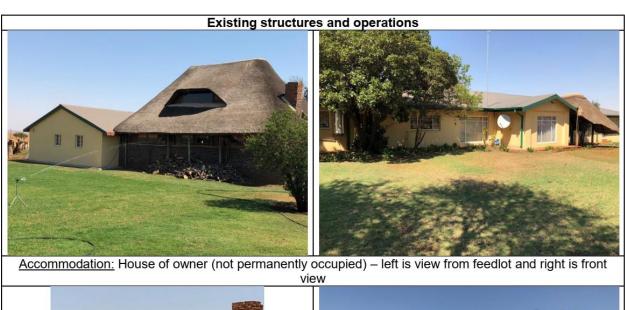
Recommendation:

That the development be exempted from doing an HIA.

I trust that you will find this in order.

Yours faithfully

Prof AC van Vollenhoven: Director







Accommodation: Workers – only six (6) workers stay on this farm; other workers stay on other farms in the area also belonging to the owner

Figure 6: Existing buildings and structures on the site.



Figure 7: More structures and features on site, including the existing feedlot.



Figure 8: Views of the site showing, lack of vegetation and operational activities linked to the feedlot on site.





West of R53: The portion of the property located to the west of the R53 is used for maize growing and contains the water supply borehole. Borehole location: 25° 56' 07.1" South; 26° 35" 37.3" East





Water reservoirs at house (left) and at feedlot (right)





Farm equipment

Loading bank - to take cattle off site to abattoir

Figure 9: View of current infrastructure.



Figure 10: Feedlots.

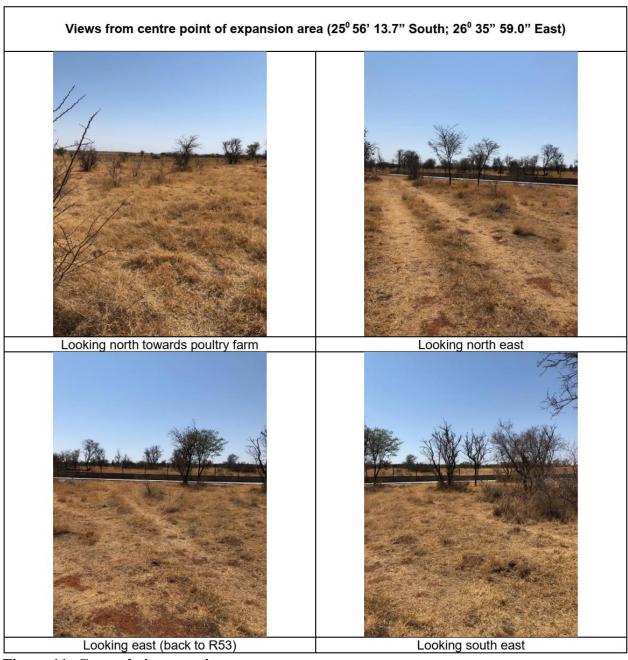


Figure 11: General views on site.

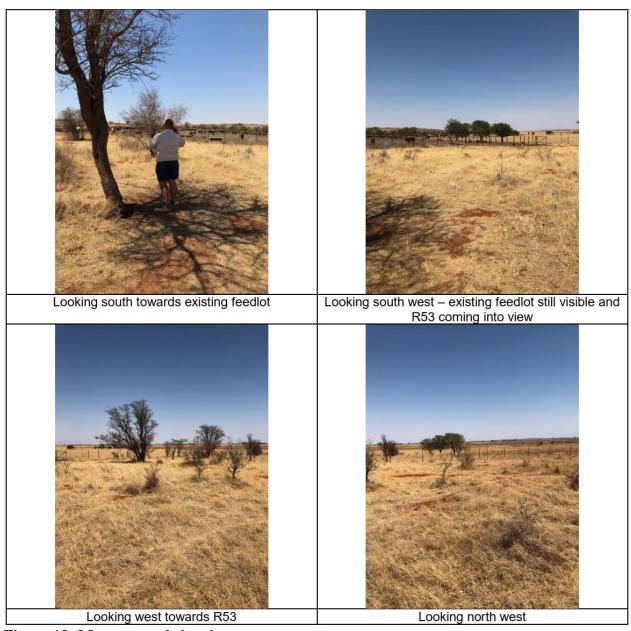


Figure 12: More general site views.