



SOUTH AFRICAN HERITAGE RESOURCES AGENCY
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FOR ATTENTION: PHRA: Mpumalanga

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SAHRA File No 9/2/236/0032
Date Received: 01 December 2010
Date of Comment: 05 October 2011
Sent to Peer Review:
Date to Peer Review:
SAHRA Contact Person: Mr. Phillip Hine
DME Ref No:

REVIEW COMMENT ON ARCHAEOLOGICAL IMPACT ASSESSMENT

BY ARCHAEOLOGY/ PALAEOLOGY UNIT OF THE HERITAGE RESOURCES AGENCY

South Africa has a unique and non-renewable archaeological and palaeontological heritage. Archaeological and palaeontological sites are protected in terms of the National Heritage Resources Act (Act No 25 of 1999) and may not be disturbed without a permit. Archaeological Impact Assessments (AIAs) and Palaeontological Impact Assessments (PIAs) identify and assess the significance of the sites, assess the potential impact of developments upon such sites, and make recommendations concerning mitigation and management of these sites. On the basis of satisfactory specialist reports SAHRA or the relevant heritage resources agency can assess whether or not it has objection to a development and indicate the conditions upon which such development might proceed and assess whether or not to issue permission to destroy such sites.

AIAs and PIAs often form part of the heritage component of an Environmental Impact Assessment or Environmental Management Plan. They may also form part of a Heritage Impact Assessment called for in terms of section 38 of the National Heritage Resources Act, Act No. 25, 1999. They may have other origins. In any event they should comply with basic minimum standards of reporting as indicated in SAHRA Regulations and Guidelines.

This form provides review comment from the Archaeologist of the relevant heritage resources authority for use by Heritage Managers, for example, when informing authorities that have applied to SAHRA for comment and for inclusion in documentation sent to environmental authorities. It may be used in conjunction with Form B, which provides relevant peer review comment.

- A. PROVINCIAL HERITAGE RESOURCES AUTHORITY: **Mr. Benjamin Moduka**
- B. AUTHOR(S) OF REPORT: **Hutten, L & Hutten, M**
- C. ARCHAEOLOGY CONTRACT GROUP: **GEM-Science**
- D. CONTACT DETAILS: **P.O. Box 32748, Glenstantia 0010**
- E. DATE OF REPORT: **November 2010**
- F. TITLE OF REPORT: **Heritage Impact Assessment for the farm Buffelskloof 141JS, Steelpoort River Valley, Mpumalanga**
- G. Please circle as relevant: Archaeological component of EIA / EMP / HIA / CMP Other (Specify).....
- H. REPORT COMMISSIONED BY (CONSULTANT OR DEVELOPER): **GEM-Science**
- I. CONTACT DETAILS: **P.O. Box 32748, Glenstantia 0010**
- J. COMMENTS:

Please see comment on next page.....

REVIEW COMMENT ON ARCHAEOLOGICAL IMPACT ASSESSMENT

Pelser, A.

Date Received: 1 December 2010 Comment: 5 October 2011

Heritage Impact Assessment for the farm Buffelskloof 141JS, Steelpoort River Valley, Mpumalanga

INTRODUCTION

An Archaeological Impact Assessment was conducted for proposed mining activities on the farm Buffelskloof 141JS, Steelpoort, Mpumalanga Province. A range of heritage resources were identified in the proposed area to be developed. These include a number of male and female initiation sites, cemeteries, historical homesteads, and two Stone Age spot finds.

- Twelve cemeteries consisting from anywhere between 5 to 44 graves.
- Several ruined historical clay and mortar structures which represents abandoned homesteads. The specialist indicated that these are likely younger than 60 years of age.
- A number of male and females initiation sites
- Two Stone Age spot finds consisting of blade fragments.

SAHRA RECOMMENDATIONS

SAHRA Archaeology, Palaeontology and Meteorites Unit have no objection to the proposed development in terms of the archaeological resources identified. However, the following recommendations must be implemented:

- SAHRA Burial Grounds and Graves (BGG) Unit recommends that all graves/grave yards that are outside the immediate area to be affected by the mining be retained in situ. A proper fence with access gates must be erected. The boundary of the fence must be at least 2 meters from the graves, and no development may proceed with 15 meters of the graves.
- The BGG Unit have no objection to the removal of graves/ grave yards within the mining activity area provided that the families give consent and that the permit application process is followed. The developer will require a permit in terms of section 36 of the National Heritage Resources Act (Act no. 25 of 1999).
- The BGG Unit have no objection to the demolition of the ruins of the homesteads but a suitably qualified and experienced archaeologist should be appointed to undertake a watching brief due to the possibility of infant burials being disturbed.
- A map showing the heritage sites clearly in relation to the proposed mining area must be submitted to SAHRA for its records.
- Please note that the above comments relate to those graves and graveyards that are definitely or likely to be 60 years or older and that other legislation applies to any graves that are less than 60 years old.
- No further mitigation is required in terms of the two archaeological spot finds identified.
- A number of male and female initiation sites have been identified on the property and must be properly documented. Please note that any Decisions in terms of Cultural Landscapes and Built Environment must be forwarded to the Mpumalanga Provincial Heritage Resources (Mr. Benjamin Moduka, bmoduka@mpg.gov.za).

- Please note that no development must proceed before a Palaeontological Impact Assessment is undertaken to assess whether or not the development will impact upon palaeontological resources. Should this be deemed unnecessary by the palaeontologist, a letter of recommendation for exemption will be required.

SIGNATURE OF ARCHAEOLOGIST PROCESSING REPORT:
 EMAIL: *phine@sahra.org.za*
 SIGNATURE OF SAHRA HEAD ARCHAEOLOGIST: *PP Mjathimberti*
 EMAIL: *nndobochani@sahra.org.za*
 NAME OF HERITAGE RESOURCES AGENCY: *SAHRA*

PLEASE NOTE THAT THE COMMENT (ABOVE OR APPENDED) CONSTITUTES THE COMMENT OF THE HERITAGE RESOURCES AGENCY ARCHAEOLOGIST AND THAT ANY DEVELOPMENT THAT INVOLVES DESTRUCTION OF ANY ARCHAEOLOGICAL/PALAEONTOLOGICAL SITE IS STILL SUBJECT TO A PERMIT/PERMISSION FOR DESTRUCTION OF SUCH SITE GIVEN TO THE DEVELOPER BY THE RELEVANT HERITAGE RESOURCES AGENCY ARCHAEOLOGICAL AND PALAEONTOLOGICAL PERMIT COMMITTEE (THIS WILL BE SUBJECT TO APPROVAL OF THE PHASE 2 OR ARCHAEOLOGICAL/ PALAEONTOLOGICAL MITIGATION AS NECESSARY). THIS REPORT MAY BE TAKEN ONLY AS APPROVAL IN TERMS OF SECTION 35 OF THE NATIONAL HERITAGE RESOURCES ACT. THE PROVINCIAL MANAGER OF THE HERITAGE RESOURCES AUTHORITY MUST ADVISE AS TO APPROVAL IN TERMS OF HERITAGE ISSUES ENCOMPASSED BY OTHER ASPECTS OF THE LEGISLATION, SUCH AS ISSUES OF THE BUILT ENVIRONMENT (STRUCTURES (E.G. FARM HOUSES), OVER 60 YEARS), INDIGENOUS KNOWLEDGE SYSTEMS OR OF CULTURAL LANDSCAPES AS THIS IS NOT WITHIN THE SCOPE OF THE ARCHAEOLOGIST.

PLEASE NOTE THAT SAHRA IS NOW RESPONSIBLE FOR GRADE I HERITAGE RESOURCES (AND EXPORT) AND THE PROVINCIAL HERITAGE RESOURCES ARE RESPONSIBLE FOR GRADE II AND GRADE III HERITAGE RESOURCES, EXCEPT WHERE THERE IS AN AGENCY ARRANGEMENT WITH THE PROVINCIAL HERITAGE RESOURCES AUTHORITY.