



SOUTH AFRICAN HERITAGE RESOURCES AGENCY
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FOR ATTENTION: PHRA: Mpumalanga

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SAHRA File No 9/2/242/0018
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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: **Küsel, U**
- C. ARCHAEOLOGY CONTRACT GROUP: **African Heritage Consultants CC**
- D. CONTACT DETAILS: **P.O. Box 652, Magalieskruin 0150**.....
- E. DATE OF REPORT: **February 2010**
- F. TITLE OF REPORT: **Cultural heritage Resources Impact Assessment for proposed new 400Kv Eskom power line between Hendrina Power Station and Gumeni.**
- G. Please circle as relevant: Archaeological component of EIA / EMP / HIA / CMP Other (Specify)
- H. REPORT COMMISSIONED BY (CONSULTANT OR DEVELOPER): **Strategic Environmental Focus, Mr. Quintin Roodt**
- I. CONTACT DETAILS: **P.O. Box 74785, Lynwood Ridge 0040, email: Quintin@sefsa.co.za**
- J. COMMENTS:

Please see comment on next page.....

REVIEW COMMENT ON ARCAHEOLOGICAL IMPACT ASSESSMENT

Kusel, U

Date Received: 24/08/2010 Comment: 01/06/2011

Cultural Heritage Impact Assessment of the proposed new Denmark Colliery Evaporation Pond, Mpumalanga Province.**INTRODUCTION**

An Archaeological Impact Assessment was conducted for the Gumeni-Hendrina power line project. According to the specialist report 10 sites of heritage significance were identified during site visit. However, the author noted that visibility in the area during the survey was poor due to tall grass cover. It is therefore possible that more archaeological and other heritage resources may be present. The following type of heritage resources was identified during the survey.

- Two graves at the Gumeni substation site believed to be older than 60 years.
- A cattle enclosure between waypoints T200 to T199 associated with farmstead T201.
- An early farmstead with graves at waypoint T201 dating to the early 20th century.
- A Late Iron Age site situated between waypoints T197 and T196.
- Another large Late Iron Age site situated between waypoints T191 and T190.
- A Late Iron Age site between waypoints T189 and T188
- A Late Iron Age site between waypoint T176 and 175.
- A circular stone structure and walling possibility dating to the South African War located between waypoints T149 and T148.
- The ruins of an old building located between waypoints T132 and T131.
- The ruins of an old farmstead located between waypoints T101 and T100.
- According to the report, google maps indicated the presence of stone walls between waypoints T47 and T46. However, these were identified later in the field as cosmos flowers.

SAHRA RECOMMENDATIONS


SAHRA APM Unit does not object to the proposed project provided the following recommendations are adhered to:

- The specialist recommended that the LIA sites located between waypoints T197-T196 and T191-T190, be demarcated for the entire duration of the period of construction. If this is not possible then Phase 2 mitigation was recommended. However, since there is likelihood that archaeological sites could be damaged underneath the power line, SAHRA APM Unit recommends that the power line must be realigned to avoid the two LIA sites. A buffer zone of 50 meters must be maintained and the sites demarcated to prevent any damage. If this is not feasible then Phase 2 mitigation

impact assessments must be conducted. The Phase 2 assessments must include amongst others, proper mapping of the LIA sites, site photography and archaeological excavations.

- The APM Unit supports the recommendation of the specialist that Pylon T188 must be moved towards the east so that impacts on the LIA site can be avoided. It is recommended that a buffer zone of 50 meters must be maintained between the power line and the archaeological sites. The sites must also be demarcated during construction to avoid accidental impacts on the site.
- The APM Unit Supports the recommendation that the LIA site between waypoint T176 – TT175 must be demarcated to avoid any accidental impacts on the site.
- Several old farmsteads were identified during the impact assessment. Please see the last paragraph of this ARC for any decision making arrangements regarding these heritage resources.
- SAHRA Burial Grounds and Graves Unit support the recommendation of the specialist regarding the graves at Gumeni Substation Site and the farmyard with graves Waypoint/Pylon T201. The BGG Unit further recommends a watching brief by a qualified archaeologists during ground clearance at the farmstead sites due to the likelihood of the presence of graves at these sites.
- If any evidence of archaeological sites or artefacts, or other heritage resources are found during construction activities, the SAHRA APM Unit (**Mrs. Nonofho Ndobochani, Mr. Phillip Hine, tel: 021-462 4502**), must be alerted immediately, and a professional archaeologist/palaeontologist must be contacted as soon as possible to inspect the findings at the cost of the developer. If the newly discovered heritage resources prove to be of archaeological/palaeontological significance, then a Phase 2 rescue operation might be necessary at the cost of the developer.
- Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, the developer must ensure that a professional Palaeontological Desk Top study is undertaken to assess whether or not the development will impact upon palaeontological resources. If this is deemed unnecessary, a letter of recommendation for exemption from a professional Palaeontologist is needed. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary (see attached list of accredited Palaeontologists).

Decisions on Built Environment (e.g. structures over 60 years) and Cultural Landscapes are not the function of this unit. Please refer to Mpumalanga Provincial Heritage Authority (Mr. Benjamin Moduka bmoduka@mpg.gov.za) to whom we will send the Impact Assessment Report and this Comment.

SIGNATURE OF ARCHAEOLOGIST PROCESSING REPORT:.....
 EMAIL: *phine@sahra.org.za*.....
 SIGNATURE OF SAHRA HEAD ARCHAEOLOGIST: 
 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.