



## Final Comment

### In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Department of Roads and Public Works, Eastern Cape  
Private Bag X 0023  
BISHO  
5605

### Utilization of eleven existing gravel borrow pits, Cacadu District, Eastern Cape

*van Ryneveld, K., April 2012. Phase 1 AIA. Utilization of existing gravel borrow pits, Cacadu District, Eastern Cape, South Africa.*

BKS was commissioned by the Department of Works and Public Works to undertake the Environmental Management Programme for the establishment and re-opening of 11 borrow pits to be used for the maintenance of roads between Graaff-Reinet, Willowmore and Port Elizabeth.

Each of the eleven borrow pits is proposed to be up to 1.5ha in size. The archaeologist surveyed ten of the proposed borrow pits and recorded two structures from the colonial period and three Stone Age occurrences. The specialist also recorded the presence of a modern memorial structure in proximity of one of the borrow pits, which, although not directly protected under the National Heritage Resources Act, should be respected and as such preserved.

The two colonial period sites are a residence close to borrow pit TR43.1, apparently in disuse, and a railway station building in proximity of borrow pit TR43/2, which is still in use.

According to the author the three Stone Age sites are dated to the Middle and Later Stone Age, TR43/1, and only to the Middle Stone Age, MR407 and DR2006. MSA artefacts were mostly in quartz, whereas LSA tools were also shaped in fine grained granite. They are mostly limited to the top 10cm of the surface and they are not *in situ*. According to the specialist because of the low significance of the findings, no further mitigation of the sites is necessary.

SAHRA APM Unit requires that:

- the three Stone Age occurrences identified by the archaeologist be described and recorded including extent of the sites, typology and relative density of the typology of the artefacts identified. After the report has been submitted to the Eastern Cape Provincial Heritage Resources Authority (ECPHRA) for record, the sites can be destroyed without the developer having to apply for a destruction permit.
- the two buildings are generally protected under s. 34 of the NHRA. According to the specialist they are not going to be affected by the borrow pits and therefore no further mitigation measures are required. No alteration or impact on these structures may occur without prior authorization from the ECPHRA.
- since no palaeontological impact assessment was undertaken for this project, SAHRA recommends





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CaseID: 299

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- that a palaeontologist inspects the fresh rock exposure of the borrow pits before rehabilitation occurs.
- if any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, marine shell and charcoal/ash concentrations), unmarked human burials, fossils or other categories of heritage resources are found during mining activities, the ECPHRA (Tel: 0436422811) must be alerted immediately, and an accredited professional archaeologist or palaeontologist according to the nature of the findings must be contacted as soon as possible. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance a Phase 2 rescue operation might be necessary.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Mariagrazia Galimberti  
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South African Heritage Resources Agency

Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency

**ADMIN:**

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.



The South African Heritage Resources Agency

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