



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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CaseID: 13451

Date: Monday April 15, 2019  
Page No: 1

## Final Comment

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

Attention: Dr Farai Tererai  
Working for Wetlands Programme

**Working for Wetlands (WfWetlands) is a government programme mandated to protect pristine wetlands, promote their wise-use and rehabilitate those that are damaged throughout South Africa, with an emphasis on complying with the principles of the Expanded Public Works Programme (EPWP) and using only local Small, Medium and Micro Enterprises (SMMEs). Due to the nature of the project, it is important to note that the very objectives of the WfWetlands Programme are to improve both environmental and social circumstances**

Working for Wetlands is proposing to rehabilitate the wetland area within the Baleni nature reserve located in the Greater Giyane Local Municipality of the Limpopo Province. They plan on accomplishing this by constructing weirs/gabions that will create a barrier that will allow for sedimentation build-up to slow the water flow and re-wet the wetland area. There will be 28 intervention areas in the wetland including a 325m cattle fence.

Aurecon South Africa (Pty) Ltd is undertaking a Basic Assessment process on behalf of Working for Wetlands, in respect of listed activities in the Environmental Impact Assessment (EIA) Regulations 2014, as amended, that require an application for Environmental Authorisation, in terms of the National Environmental Management Act, 1998 (NEMA), as amended.

To meet the requirements of section 38(8) of the National Heritage Resources Act, no 25 of 1999, a Heritage Impact Assessment (HIA) Report by G&A Heritage Management Consultants (Pty) Ltd had been submitted to South African Heritage Resources Agency (SAHRA) for commenting on 11/02/2019. In an Interim Comment issued on 18/03/2019, SAHRA summarised the HIA report as follows:

*Gaigher, S. December 2018. Phase 1 Heritage Impact Assessment Report for the Proposed Anti-Erosion Measures at the Baleni Salt Works Provincial Heritage Site, Limpopo Province.*

*The author undertook a field assessment of the proposed wetland area and identified two heritage sites that may be impacted by the proposed intervention areas. The first site, Site 1 in the HIA is the same site that was described in a Masters research paper as site BS04; it consists of hut floor remains, ash deposits, and*



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Page No: 2

*potsherds of which some are diagnostic. This site will be partially impacted by trenching to install intervention measures to curb continued erosion. The author assessed the disturbance as beneficial to the long conservation of other archaeological sites downstream.*

*The second site, Site 2 is a single grave site located outside the proposed rehabilitation intervention areas. Both sites are of high heritage significance. As well as all other sites located within the entire wetland area is the Baleni Salt-works as it is a Provincial Heritage Site (PHS).*

*The author recommends:*

*No assessment of impacts on palaeontological resources because the study area is located in the grey zone in the SAHRA palaeo-map.*

*Site 1 must be mitigated by a qualified archaeologist in the area that will be disturbed by the installation of a gabions at Intervention B82G-01-213-00. In order to carry out the mitigations, a section 35 of the NHRA permit application must be applied for to SAHRA.*

*The cemetery must be protected by a 25 m buffer zone during construction.*

*The Chance Finds procedures provided in the report must be included in the EMPr for all intervention measures as well as the cattle fence construction.*

SAHRA could not process the case to its conclusion until the accompanying environmental documents (BAR and appendices) were submitted to the case. The BAR has since been submitted and within section 7.1.4, it states that an archaeological excavation must be undertaken for site at 23°25'13" S 30°54'52" E (under a permit issued by SAHRA). The grave site at 23°25'13" S 30°54'52" E will not be directly impacted but it may be impacted indirectly by construction activities. A buffer of 25 m radius must be applied to the grave site as a no-go area.

## **Final Comment**

The South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit accepts the recommendations provided in the HIA report however, the buffer zone around the grave must be increased to 30m.



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Page No: 3

The following additional recommendations must also be included as part of the EMP for implementation during construction:

- An archaeologist must be appointed to undertake a weekly monitoring programme of all construction activities and develop a heritage training manual for the induction of the construction crew and ECO.
- All access points to the construction site, construction camps, laydown areas and stockpile areas must be assessed by an archaeologist prior to the construction phase. A report of the walk down assessment must be submitted to SAHRA.
- Once the design of the weir is finalised the potential extent of flooding must be determined and the potential impacts to the surrounding heritage sites must be assessed. This assessment must be included in the walk-down report.
- A CMP must be developed from the findings of this assessment, the CMP must also address any monitoring measures required for the long-term maintenance of the weirs.
- In the unlikely event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.
- If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.
- If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8654).
- If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves, then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivase/Mimi Seetelo 072 802 1251).
- The Final BAR and its appendices must be uploaded to the case on SAHRIS.
- Once a decision on the EA application is reached, the record of decision must be uploaded to the case on SAHRIS.

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

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Page No: 4

above in the case header.

Yours faithfully

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Nokukhanya Khumalo  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/520847>

**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.