



an agency of the
Department of Arts and Culture

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CaseID: 13947

Date: Monday September 09, 2019

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Final Comment

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

Attention: Emross Consulting (Pty) Ltd

Proposed installation of a Fibre Optic Cable, development of ablution facilities, the activation of a borehole with associated electrical and water reticulation, construction of an evaporation pond and various renovations and additions at Ravencourt Ranch, Sabi Sands

Ravencourt Ranch (Pty) Ltd are proposing to construct a new underground water pipeline, underground fibre optic line, 22kV transformer and underground power line. As well as new staff ablution facilities, houses, new gym, boutique shop and other lodge facilities. The Ranch is located within the Sabi Sands Game Reserve, on the farms Ravencourt 257 KU and Castleton 260 KU, in the Bushbuckridge Local Municipality of the Mpumalanga Province.

Emross Consulting (Pty) Ltd have submitted a draft Background Information Document (BID) on behalf of the applicant, Ravencourt Ranch (Pty) Ltd. In support of an application for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (NEMA) for listed activities in the NEMA 2014 EIA Regulations as amended.

In order to meet the requirements of SAHRA for commenting in terms of section 38(8) of the National Heritage Resources Act, no. 25 of 1999 (NHRA), a Heritage Impact Assessment by African Conservation Trust (ACT) has been submitted to SAHRA for commenting. In an Interim Comment issued on 11/07/2019, SAHRA summarised the HIA report as follows:

Radford van De Venter, A. and Grossman, C. June 2019. Heritage Impact Assessment Report for the Installation of a Fibre Optic Cable, Development of Ablution Facilities, the Activation of a Borehole with Associated Electrical and Water Reticulation, Construction of an Evaporation Pond and Various Renovations and Additions, Ravencourt Ranch, Sabi Sands Game Reserve (Mpumalanga Province).

The author undertook a field survey of the proposed development areas and identified 3 heritage sites (SS-01;



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SS-02; and SS-03) that will be directly impacted by the proposed development. The author rates SS-1 and SS-02 are isolated MSA stone tool finds along the road cutting, that are of low significance and the author recommends that the development may proceed without further intervention for these sites. SS-03 is Early Iron Age site of medium significance. The author recommends monitored during construction, to avoid potential impacts due to its proximity to the proposed development activities.

SAHRA could not process the case to its conclusion until the accompanying environmental documents (BAR and appendices) were submitted to the case. The Final BAR has since been submitted and on page 42 the report mentions mitigation measures that must be included as part of the conditions of the EA.

Final Comment

South African Heritage Resources Agency (SAHRA) Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA report and the recommendations provided therein. SAHRA has no objection to the development going ahead. However as the EA has been granted without SAHRA's final comments being considered, SAHRA requires the EA to be amended to include the following conditions above EA condition 3.53:

- Site SS-03 must be demarcated temporarily by an archaeologist with a 50 m boundary, and preliminary pre-construction photographs must be taken to be used as a baseline for monitoring by the ECO during construction.
- A Monitoring report of the monitoring undertaken during construction must be submitted to SAHRA after construction.
- SAHRA supports the undertaking to apply for a section 35 destruction permit application, in terms of NHRA and Chapter IV NHRA Regulations for sites SS-1 and SS-02.

In the unlikely event that fossils are uncovered during construction then construction must cease within the

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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).

This comment must be forwarded to the competent authority and proof of submission must be uploaded to the case.

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

Yours faithfully

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Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:
Direct URL to case: <http://www.sahra.org.za/node/524503>
(, Ref:)