



Letter

In terms of Section 35(4) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Dr Heidi Fourie
Ditsong Museums of South Africa
Edit view P.O. Box 413
Pretoria
0001

Removal of fossils from the riverbed for research purposes in the Middelburg magisterial district, Eastern Cape.

Many thanks for the submission of your interim permit report via email on 6 March 2014 for the above permit.

It is noted that since SAHRA issued this permit in July 2012, the Eastern Cape Provincial Heritage Authority has taken on full competency in terms of Section 35 of the National Heritage Resources Act, the section relevant to this report. However, as the permit was issued by SAHRA and is still valid, it has been determined that SAHRA is the correct authority to assess the submitted permit report.

SAHRA has identified a number of concerns with regard to the submitted report. As per the SAHRA regulations and the SAHRA "Guidelines to Palaeontological Permitting Policy", interim permit reports must include details of;

- *The name and geographical location of the site or sites (with GPS co-ordinates and magisterial districts)*

While you have provided the name of the farm and the GPS co-ordinates of the farm house, you have not provided SAHRA with the names of the sites from which fossils were collected, nor the GPS co-ordinates of these localities.

- *A map (at least 1:10 000 or 1:50 000) indicating the location of the site(s) and, if a survey is involved, exactly what areas on the map were searched and by what means this was done.*

In the submitted report, you have included a 1:250 000 geological map and a 1:250 000 drawn map of a river and farms indicating the approximate location of outcrops. Neither of these maps meets the criteria established above.

- *A diagram showing where material was collected or excavations were located.*

In the text of the document, you indicate that this project which began in 2005 has yielded over 22 fossils. No detail is given regarding the number of fossils collected during the period under review in this report, nor is any detail provided regarding the location of excavations or where material was collected.

- *A description of the work*

In the description of work provided, only general information seems to be provided. SAHRA requests further detail regarding the number of fossils collected, a brief field description of these fossils and details of the





techniques used to collect these fossils.

- *The name of the institution curating this material*

Many thanks for providing this information

- *The permit number*

Many thanks for providing this information

In the email containing this permit report, it was requested that the report not be uploaded onto SAHRIS. However, no reason was provided for this request.

SAHRA understands the concerns of researchers in terms of the privacy of sensitive scientific information, however the report as submitted does not seem to contain any such sensitive information. In addition, SAHRA has provided a mechanism for keeping sensitive information regarding the location and content of heritage resources out of the public domain by using the Site Recording system on SAHRIS.

Although not included in any policy or regulation documents as yet, it is proposed that in the future, it will be required that all sensitive location information and detail be excluded from the permit report document, and instead be submitted to SAHRA via the SAHRIS Site Recording system where it can be retained for future reference but remains out of the public domain.

SAHRA is therefore unable to accept the submitted permit report as it stands and requests that;

- A revised permit report be submitted that includes the outstanding information identified above. Please include written motivation providing detail as to why this resubmitted report should not be uploaded to the SAHRIS system.

- Alternatively, please record the requested site information using the SAHRIS Site Recording system and amend the submitted report to include general information about methodology and the techniques used.

It is required that this requested information be submitted to SAHRA within two months of the date of this correspondence being 17 May 2014. Please note that failure to comply is in contravention of the requirements of the issued permit.

SAHRA looks forward to receiving the requested information before commenting further.

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

Yours faithfully





Jenna Lavin
Heritage Officer
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/26755>

