



## Final Comment

**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the KwaZulu-Natal Heritage Act (Act 4 of 2008)**

Attention: Sappi Saiccoris

The proposal is to raise the dam wall by 4.5m which will result in the inundation of an additional area of approximately 10 ha. However, the area of proposed inundation lies entirely within an extant wetland and the immediate land use surrounding the dam site comprises long term commercial afforestation, which has fundamentally transformed the previous mist-belt grasslands and attendant landscape. Given the nature of the project and the environment, including a long history of commercial forestry, we believe that there is no need for a Phase 1 HIA for this project. Accordingly, we propose to submit an application for exemption from an HIA for the project to Amafa, including exemption of a Palaeontology Assessment. Comrie Dam is situated within the Sisonke District Municipality approximately 7 km north east of Donnybrooke. The current dam wall is located at 29°52'30.94"S 29°55'34.57"E.

We acknowledge receipt of your request for amendment to the comment/rod with regards to the proposed development.

In addition to the Amafa comment of 27 July 2015 on the Exemption Motivation Letter by Len Schalkwyk of eThembeni with the recommendation that the development should proceed as planned considering that the proposed area of development involving raising of a dam-wall will inundate an area that has been subjected to decades of severe environmental disturbance, we note the additional information provided to us by eThembeni in a letter dated 1 October 2015 indicating that the dam will inundate some of the existing roads and lead to the construction of a new road in a largely disturbed environment as captured below:

- “due to the raised water level the existing Plantation Road will be inundated. Three new roads will be developed to enable access and to accommodate Sappi forestry activities. This comprises the rerouting of two existing roads over a distance of 1.5km each and a new long haul road of approximately 4.5km. All the new alignments are through areas of existing afforestation (See SAHRIS Case Image # 1). No impact to discrete heritage resources is reported or anticipated.”In addition the letter requesting amendment to the Amafa ROD states that the area of inundation as per the supplied maps and diagrams is 79.2 ha and not 10 hectares as erroneously stated in the Exemption motivation of 5 June 2015.

A study of the Basic Assessment Report submitted in support of this application shows that there is presence of small patches of natural / indigenous vegetation between plantations and cultivated land. While we are aware that eThembeni conducted a foot survey on 15 May 2015, the developer should note that these patches



Our Ref: SAH15/8170

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could be associated with unmarked graves. The developer should take cognisance of the possibility of encountering sub-surface finds and informal or unmarked graves during site clearance and earth-moving activities. For this reason, the developer should ensure that the construction team is on the look-out for any possible stone-age and iron age resources during the entire process of construction of the dam.

Amafa, the KwaZulu Natal Heritage Authority has considered the reasons put forward by eThembeni and has no objection to the development provided that Amafa is provided with evidence of community consultative process around issues of graves/burial ground in the area to be inundated before any construction activities commence.

You are also required to adhere to the below-mentioned standard conditions:

Conditions:

1. Amafa should be contacted if any heritage objects are identified during earthmoving activities and all development should cease until further notice.
2. No structures older than sixty years or parts thereof are allowed to be demolished altered or extended without a permit from Amafa.
3. No activities are allowed within 50m of a site, which contains rock art.
4. Sources of all natural materials (including topsoil, sands, natural gravels, crushed stone, asphalt, etc.) must be obtained in a sustainable manner and in compliance with the heritage legislation.

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

Yours faithfully

Bernadet Pawandiwa  
Senior Heritage Officer  
Amafa/Heritage KwaZulu Natal

Annie van de Venter Radford



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Deputy Director: Research, Professional Services and Compliance  
Amafa/Heritage KwaZulu Natal

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/317288>  
(, Ref: )

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 Amafa immediately.
3. Amafa reserves the right to request additional information as required.



Amafa AkwaZulu-Natali  
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