



SOUTH AFRICAN HERITAGE RESOURCES AGENCY
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FOR ATTENTION: **SAHRA** Mr. J. Sinthumule
Northern Cape PHRA

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SAHRA File No: 9/2/023/0001

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SAHRA Contact Person: Ms. Mariagrazia Galimberti

DME Ref No:

REVIEW COMMENT ON PALAEOLOGICAL IMPACT ASSESSMENT

BY ARCHAEOLOGY/ PALAEOLOGY UNIT OF THE HERITAGE RESOURCES AGENCY

South Africa has a unique and non-renewable archaeological and palaeontological heritage. Archaeological and palaeontological sites are protected in terms of the National Heritage Resources Act (Act No 25 of 1999) and may not be disturbed without a permit. Archaeological Impact Assessments (AIAs) and Palaeontological Impact Assessments (PIAs) identify and assess the significance of the sites, assess the potential impact of developments upon such sites, and make recommendations concerning mitigation and management of these sites. On the basis of satisfactory specialist reports SAHRA or the relevant heritage resources agency can assess whether or not it has objection to a development and indicate the conditions upon which such development might proceed and assess whether or not to issue permission to destroy such sites.

AIAs and PIAs often form part of the heritage component of an Environmental Impact Assessment or Environmental Management Plan. They may also form part of a Heritage Impact Assessment called for in terms of section 38 of the National Heritage Resources Act, Act No. 25, 1999. They may have other origins. In any event they should comply with basic minimum standards of reporting as indicated in SAHRA Regulations and Guidelines.

This form provides review comment from the Archaeologist of the relevant heritage resources authority for use by Heritage Managers, for example, when informing authorities that have applied to SAHRA for comment and for inclusion in documentation sent to environmental authorities. It may be used in conjunction with Form B, which provides relevant peer review comment.

- A. PROVINCIAL HERITAGE RESOURCES AUTHORITY: **Northern Cape PHRA**
- B. SAHRA PROVINCIAL MANAGER NORTHERN CAPE : **Att: Ms Rose Rose Cwangae** .
- C. AUTHOR(S) OF REPORT: **Dr John E. Almond**
- D. PALAEOLOGY CONTRACT GROUP: **Natura Viva**
- E. CONTACT DETAILS: **P.O. Box 12410 Mill St, Cape Town**
- F. DATE OF REPORT: **May 2008**
- G. TITLE OF REPORT: **COLESBERG ROAD UPGRADE PROJECT:
PALAEOLOGICAL IMPACT ASSESSMENT**.....
- H. Please circle as relevant: Palaeontological component of EIA / EMP / **HIA** / CMP
- I. REPORT COMMISSIONED BY (CONSULTANT OR DEVELOPER): **CCA ENVIRONMENTAL (Pty) Ltd, Unit 35 Roeland Square, 30 Drury lane, Cape Town 8001**
- J. CONTACT DETAILS: **tel: 0214622228, eloise@ccaenvironmental.co.za**
- K. COMMENTS:
- Please see comment on next page*

REVIEW COMMENT ON PALAEOLOGICAL IMPACT ASSESSMENT

Author: **Dr. John E. Almond**

Date received: **4 February 2010**, Commented: **9th February 2010** (received before but not recorded).

COLESBERG ROAD UPGRADE PROJECT: PALAEOLOGICAL IMPACT ASSESSMENT

INTRODUCTION

The development for which this Palaeontological Impact Assessment (PIA) was carried out aims to rehabilitate and upgrade section 7 of the N9 between Colesberg and Wolwefontein (32 km) and upgrade of the N1/N9 intersection at Colesberg

Four of the eight borrow pits were excavated, three into the dolerite (unfossiliferous) and one into distal floodplain sediment, to identify possible fossil evidences. Given the absence of any palaeontological interest in the area, the author decided not to pursue the excavation of the other pits and suggests that no objections are raised on palaeontological ground for the completion of the development.

SAHRA RECOMMENDATIONS

According to this PIA the proposed upgrade and rehabilitation proposed by South African National Roads Agency Limited (SANRAL) will not impact the palaeontological heritage of the area.

No palaeontological material was so far identified in the surveyed area. This does not exclude though the possibility to identify in the area impacted by the development palaeontological remains. The borrow pit 3 and the area interested by the new intersection are in fact excavated into the distal floodplain sediment of the Beaufort Group, which might be of palaeontological interest.

SAHRA therefore supports the recommendations of the author and requires that: the proposed development activity is carried out with no further mitigation.

CONCLUSION

As there is apparently no evidence of any significant palaeontological material in this area, the SAHRA Archaeology, Palaeontology and Meteorite Unit has no objection to the development (in terms of the archaeological and palaeontological component of the heritage resources) on condition that, if any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during development, construction or mining, SAHRA or an archaeologist must be alerted immediately.

In particular, where bedrock or river gravels are to be affected by mining, it is the responsibility of the developer to ensure that a Palaeontological Desk Top study is undertaken to assess whether or not the development will impact upon palaeontological resources, or at least a letter of exemption from an accredited

palaeontologist is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary.

For any possible decisions in terms of section 34 of the **NHRA on the Built Environment** must be made by SAHRA Provincial Heritage office (*Ms Rose Cwangae - Secretary: rcwangae@nc.sahra.org.za*) and the Provincial Heritage Resources Authority of the Northern Cape (*Mr. Joas Sinthumule: jsinthumule@bp.ncape.gov.za*).

SIGNATURE OF ARCHAEOLOGIST PROCESSING REPORT: *M. Galimberti*

EMAIL: *mgalimberti@sahra.org.za*

SIGNATURE OF SAHRA HEAD ARCHAEOLOGIST:

EMAIL: *mleslie@sahra.org.za*

NAME OF HERITAGE RESOURCES AGENCY: SAHRA *..... M. Galimberti*

PLEASE NOTE THAT THE COMMENT (ABOVE OR APPENDED) CONSTITUTES THE COMMENT OF THE HERITAGE RESOURCES AGENCY ARCHAEOLOGIST AND THAT ANY DEVELOPMENT THAT INVOLVES DESTRUCTION OF ANY ARCHAEOLOGICAL/PALAEONTOLOGICAL SITE IS STILL SUBJECT TO A PERMIT/PERMISSION FOR DESTRUCTION OF SUCH SITE GIVEN TO THE DEVELOPER BY THE RELEVANT HERITAGE RESOURCES AGENCY ARCHAEOLOGICAL AND PALAEONTOLOGICAL PERMIT COMMITTEE (THIS WILL BE SUBJECT TO APPROVAL OF THE PHASE 2 OR ARCHAEOLOGICAL/ PALAEONTOLOGICAL MITIGATION AS NECESSARY). THIS REPORT MAY BE TAKEN ONLY AS APPROVAL IN TERMS OF SECTION 35 OF THE NATIONAL HERITAGE RESOURCES ACT. THE PROVINCIAL MANAGER OF THE HERITAGE RESOURCES AUTHORITY MUST ADVISE AS TO APPROVAL IN TERMS OF HERITAGE ISSUES ENCOMPASSED BY OTHER ASPECTS OF THE LEGISLATION, SUCH AS ISSUES OF THE BUILT ENVIRONMENT (STRUCTURES (E.G. FARM HOUSES), OVER 60 YEARS), INDIGENOUS KNOWLEDGE SYSTEMS OR OF CULTURAL LANDSCAPES AS THIS IS NOT WITHIN THE SCOPE OF THE ARCHAEOLOGIST.

PLEASE NOTE THAT SAHRA IS NOW RESPONSIBLE FOR GRADE I HERITAGE RESOURCES (AND EXPORT) AND THE PROVINCIAL HERITAGE RESOURCES ARE RESPONSIBLE FOR GRADE II AND GRADE III HERITAGE RESOURCES, EXCEPT WHERE THERE IS AN AGENCY ARRANGEMENT WITH THE PROVINCIAL HERITAGE RESOURCES AUTHORITY.

COLESBERG ROAD UPGRADE PROJECT: PALAEOLOGICAL IMPACT ASSESSMENT



Colesberg Kop viewed from the south (N1 / N9 interchange construction site) showing lenticular channel sandstone halfway up slope and thick dolerite sill towards the crest

JOHN E. ALMOND PhD (Cantab.)

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