

**McGregor Museum
Department of Archaeology**



**Archaeological Impact Assessment
Phase 1 for inclusion in Basic
Assessment Report 25/2011:
Proposed upgrading of Goegap Nature
Reserve, near Springbok, Northern
Cape.**

David Morris
McGregor Museum, Kimberley
February 2012

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Introduction

This report is commissioned by Irmé van Zyl of Van Zyl Environmental Consultants cc (+2772 222 6194; fax 086 624 0306; tel +2754 338 0722 ; email ibvanzyl@telkomsa.net, P.O. Box 567, Upington, 8800, South Africa). It provides a Phase 1 Archaeological Impact Assessment for inclusion in Basic Assessment Report 25/2011: Proposed upgrading of Goegap Nature Reserve, near Springbok, Northern Cape.

The upgrading is to include:

The demolition of the existing guesthouse, the trails camp hut, the guardhouse, the group camp, the administration offices and staff accommodation; the construction of two new family camps, a guard house, additions to the new guard house including paving, a new group camp, new trails camp hut, administration office, conference venue, staff accommodation facilities and a game fence with a height of 2.4 m; and the reticulation of all electrical and water supplies that are required for the works, as well as all other engineering services.

The terms of reference for this study include specifying legislation and permit requirements that are relevant to this project; a general description of both the colonial era and the precolonial era heritage resources, including elements of the built environment as well as cultural landscapes and living heritage, found in, or in the area surrounding the various development sites within the greater Goegap Nature Reserve; coordinates of areas of interest, where relevant; a table identifying all possible direct, indirect and cumulative heritage-related impacts that could result from the proposed project, indicating whether these impacts are related to the design, construction or operational phases of the proposed project, and recommending measures aimed at avoiding and/or mitigating each potential impact; an assessment of the significance of the identified impacts both before and after mitigation; a statement regarding the specialist's level of confidence with regard to the recommendations and predictions made in respect of the mitigation and resulting intensity of each impact, depending on the specialist's knowledge as well as the availability of information.

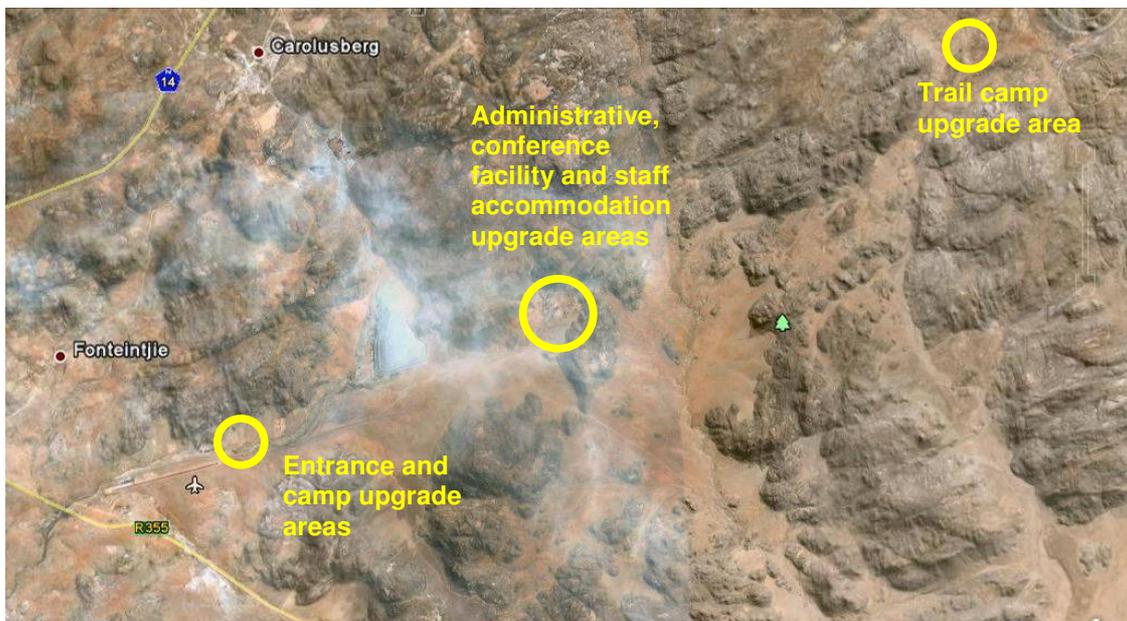
Specialist and legislative framework

The author of this report is an archaeologist (PhD) accredited as a Principal Investigator by the Association of Southern African Professional Archaeologists, having previously carried out surveys and fieldwork on sites throughout the Northern Cape including Namaqualand. The author works independently of the organization commissioning this specialist input, and provides this report within the framework of the National Heritage Resources Act (No 25 of 1999).

The National Heritage Resources Act No. 25 of 1999 (NHRA) protects heritage resources which include archaeological and palaeontological objects/sites older than 100 years, graves older than 60 years, structures older than 60 years, as well as intangible values attached to places. The Act requires that anyone intending to disturb, destroy or damage such sites, objects and/or structures may not do so without a permit from the relevant heritage resources authority. This means that a Heritage Impact Assessment should be performed, resulting in a specialist report as required by the relevant heritage resources authority/ies to assess whether authorisation may be granted for the disturbance or alteration, or destruction of heritage resources.

Environmental and heritage context

The environment in question is dominated by granite mountains interspersed by drainage lines and slopes and sub-horizontal sandy plains, situated about 15 km south east of the town of Springbok in Namaqualand. It is set aside as a Nature Reserve administered by the Northern Cape Provincial Administration.



The map indicates the three main focus areas of intended upgrade.

The archaeology of the Northern Cape is rich and varied, covering long spans of human history (Beaumont & Morris 1990; Morris & Beaumont 2004). Stone Age material found in the wider region spans the Earlier, Middle and Later Stone Ages through Pleistocene and Holocene times. Of particular significance in the local environment would be any evidence bearing on the introduction of a herding way of life, which was well established at the time of first colonial contact from the late seventeenth century (e.g. Webley 2007). There are in addition ample traces locally of the colonial era reflecting the extension of a colonial farming frontier as well as the major mid-nineteenth and subsequent exploitation of copper, which gave rise to the local towns.

Some areas in any given environment would be richer than others, and not all sites are equally significant. Heritage impact assessments are a means to facilitate development while ensuring that what should be conserved is saved from destruction, or adequately mitigated and/or managed.

Methods and limitations

The site was visited on 7 February 2012 when Goegap Reserve personnel assisted in taking the author to the sites of intended upgrade. Those sites were examined in detail on foot. In addition nearby sites of known or suspected heritage value were inspected.

The local context in each case suggested that there were not likely to be major sub-surface occurrences of cultural heritage (archaeological or colonial), and hence that traces visible (or absent) at the surface would be a fair reflection of likely heritage significance in each instance. However, there is always a possibility of subsurface features such as graves not being visible at the surface and hence a proviso is routinely included that in the event of any such feature being found work should halt immediately and relevant authorities be contacted to establish significance and recommend mitigation where necessary.

Anticipated impacts

The major destructive impacts of the proposed upgrades as far as archaeological and cultural heritage sites are concerned would tend to be direct, once-off events during construction. Access roads/servitudes already exist so that secondary impacts from such sources would be minimal or ruled out. Longer term secondary impacts from increased visitor numbers at localities of upgrade may need to be considered in at least one instance.

With respect to the magnitude and extent of potential impacts, anticipated construction would involve modification of the landscape surface within limited areas involving up to total surface disturbance corresponding with the relatively limited footprint of upgrade components.

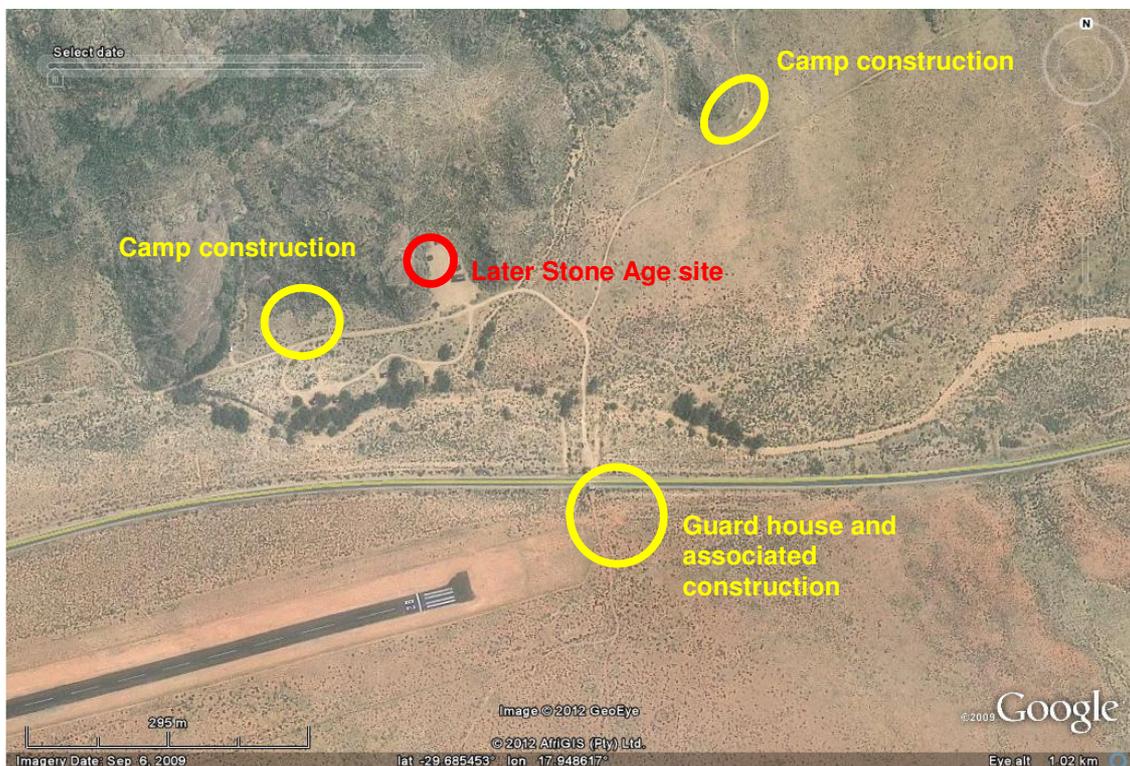
Relevant observations

The areas of proposed disturbance were each investigated on foot.

1. At and near the Reserve entrance.

Three areas were indicated for new constructions – of a new guardhouse and adjacent infrastructure and at two camp site locales below hills north west and north east of there, shown in yellow in the map below.

With the exception of a few sherds of colonial era, probably twentieth century, ceramics near the proposed camp site north west of the guard house, no archaeological or cultural heritage traces of note were located on any of the footprint areas of proposed upgrading.





Above: View north westwards towards the current guard house at entrance (at left in picture). No artefacts occur on the area examined (foreground). Below: Area for proposed camp site at base of granite hill: no artefacts noted. A few sherds of ceramics noted at second camp site.



Of significance is a small rock shelter immediately west of and above a day visitor picnic facility indicated by the red circle in the above map. The shelter, at 29.684125° S 17.946909° E, has what could be colonial era stone walling partly across the entrance, behind which there is archaeological deposit containing stone artefacts. There are also artefacts on the talus slope below the shelter.



Small shelter with stone walling (above) and stone artefacts and ostrich eggshell water flask fragments in the deposit (below).



The site appears to be regularly visited. Measures should be investigated to control access and/or protect the deposit which could be of significance for the

regional archaeology. The ceiling of the shelter is blackened from fires. It is not known if finger paintings, such as those documented at Kangnas and at sites south west of Springbok, might have existed beneath the layer of soot.

2. In and around the administrative area

A relatively undisturbed area downslope from the administrative offices was indicated, as also the on-going upgrading of staff quarters (as shown in the map).



No archaeological or cultural heritage traces were noted in the area downslope from the administrative offices; and no significant features requiring modification of plans or mitigation were in evidence at the existing staff housing site.

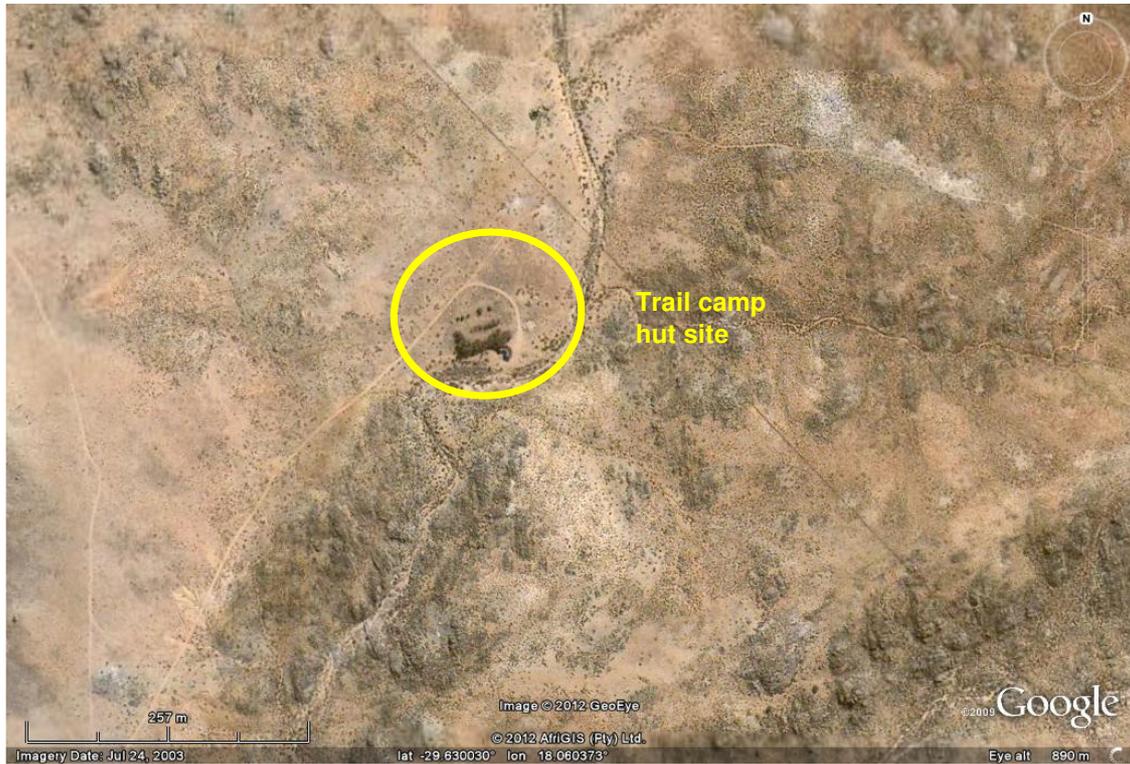


Area downslope from administrative offices. Some degree of previous disturbance was noted, while no artefacts were evident. The upgrading of staff housing has no heritage impact (below).



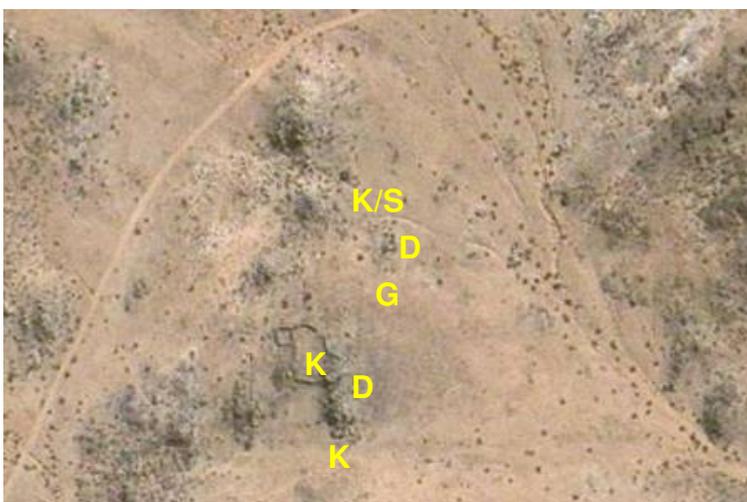
3. Trail camp hut

The vicinity of the trail camp hut – the existing one to be demolished and replaced – was examined. Again no artefacts or heritage features were found in the immediate locale which would be impacted by the proposed upgrade.



Existing trail camp hut – no artefacts or heritage features in the immediate vicinity.

Along the trail towards the camp hut, about 1.9 km SSW of the hut, there is a significant colonial era settlement, possibly a *veepos*, consisting of at least one, perhaps two dwelling units, several kraals, a kook skerm and other elements (perhaps including two graves). Situated at 29.645293° S 17.051150° E, this may represent part of a seasonal transhumance cycle when stock farmers in the past would trek between summer and winter grazing. The site shows skilled use of environmental features in construction, with the dwelling and kraal elements maximizing natural rock formations for economy of materials and shelter from prevailing winds and weather.



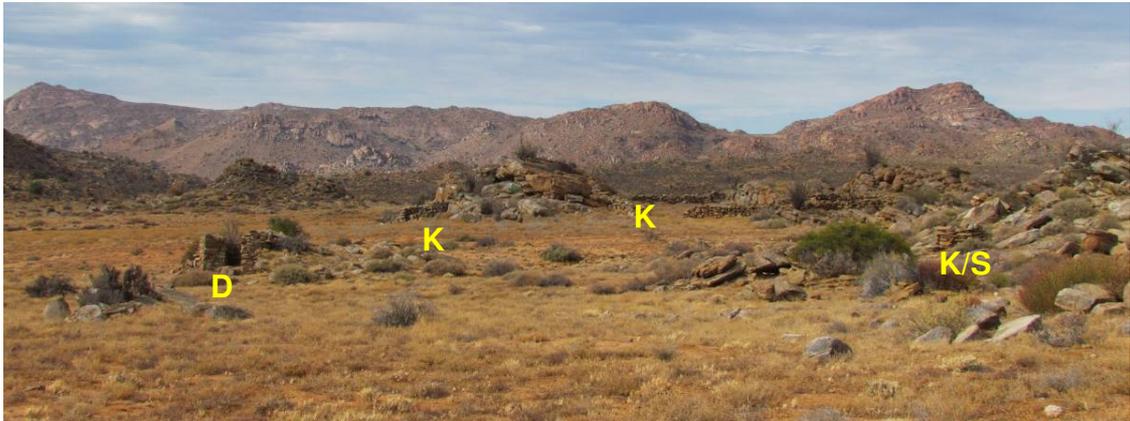
Veepos features:

K Kraal walling

D Dwelling unit

K/S Kookskerm/oven

G Possible graves



View of *Veepos* from north: dwelling at left, kraals in middle, *bakoond* (oven) at right.



Dwelling built against rock outcrop (above); oven (below).





Kraals maximizing natural rock outcrops. This complex of features is close to the trail but well clear of any of the planned infrastructure upgrades.

Assessment and Recommendations

Few and often zero heritage traces were found on the specific sites intended for upgrade and no mitigation at those particular places is regarded as necessary.

However, close to the camp site development locales near the entrance to the reserve, and immediately adjacent to the day visitor picnic site, there is a shelter in the hillside with potentially significant Later Stone Age material. It is recommended that some measure of access control and/or protection of this site should be built into the management plan for this part of the Reserve.

Secondly, the Veepos site which is situated just under 2 km from the camp trail hut and close to the trail itself, is a significant colonial era site which also requires a management plan, but is probably less exposed to frequent visits. It is unlikely to be affected in any direct way by the proposed upgrade – although the latter could result in increased numbers of visitors.

In the unlikely event of any further site/feature (such as an unmarked grave or an ostrich eggshell cache) being found in the course of the proposed upgrading, SAHRA should be contacted immediately (021-4624502: Mrs Colette Scheermeyer), so that the find can be investigated and mitigation measures recommended. The Northern Cape PHRA (Ngwao Bošwa ya Kapa Bokone), to which a copy of this report is also being sent, will assume responsibility for archaeological resources in the province when it is accredited to deal with this

aspect of heritage. Bošwa (053-8312537: Mr Ratha Timothy) should be contacted in respect of the built environment.

Records

The archive of field notes and images resulting from this study is preserved at the McGregor Museum in Kimberley.

Acknowledgements

I thank Mrs Irme van Zyl for information and Mrs Maxie Jonk and her staff at Goegap for transport and indication of sites during the survey.

References

Beaumont, P.B. & Morris, D. 1990. *Guide to archaeological sites in the Northern Cape*. Kimberley: McGregor Museum.

Morris, D. & Beaumont, P. 2004. *Archaeology in the Northern Cape: some key sites*. Kimberley: McGregor Museum.

Webley, L. 2007. Archaeological evidence for pastoralist land-use and settlement over the last 2000 years. *Journal of Arid Environments* 70: 629–640.

Determining archaeological significance

In addition to guidelines provided by the National Heritage Resources Act (Act No. 25 of 1999), a set of criteria based on Deacon (nd) and Whitelaw (1997) for assessing archaeological significance has been developed for Northern Cape settings (Morris 2000a). These criteria include estimation of landform potential (in terms of its capacity to contain archaeological traces) and assessing the value to any archaeological traces (in terms of their attributes or their capacity to be construed as evidence, given that evidence is not given but constructed by the investigator).

Estimating site potential

Table 1 (below) is a classification of landforms and visible archaeological traces used for estimating the potential of archaeological sites (after J. Deacon nd, National Monuments Council). Type 3 sites tend to be those with higher archaeological potential, but there are notable exceptions to this rule, for example the renowned rock engravings site Driekopseiland near Kimberley which is on landform L1 Type 1 – normally a setting of lowest expected potential. It should also be noted that, generally, the older a site the poorer the preservation, so that sometimes any trace, even of only Type 1 quality, can be of exceptional significance. In light of this, estimation of potential will always be a matter for archaeological observation and interpretation.

Assessing site value by attribute

Table 2 is adapted from Whitelaw (1997), who developed an approach for selecting sites meriting heritage recognition status in KwaZulu-Natal. It is a means of judging a site's archaeological value by ranking the relative strengths of a range of attributes (given in the second column of the table). While aspects of this matrix remain qualitative, attribute assessment is a good indicator of the general archaeological significance of a site, with Type 3 attributes being those of highest significance.

Table 1: Classification of landforms and visible archaeological traces for estimating the potential for archaeological sites (after J. Deacon, National Monuments Council).

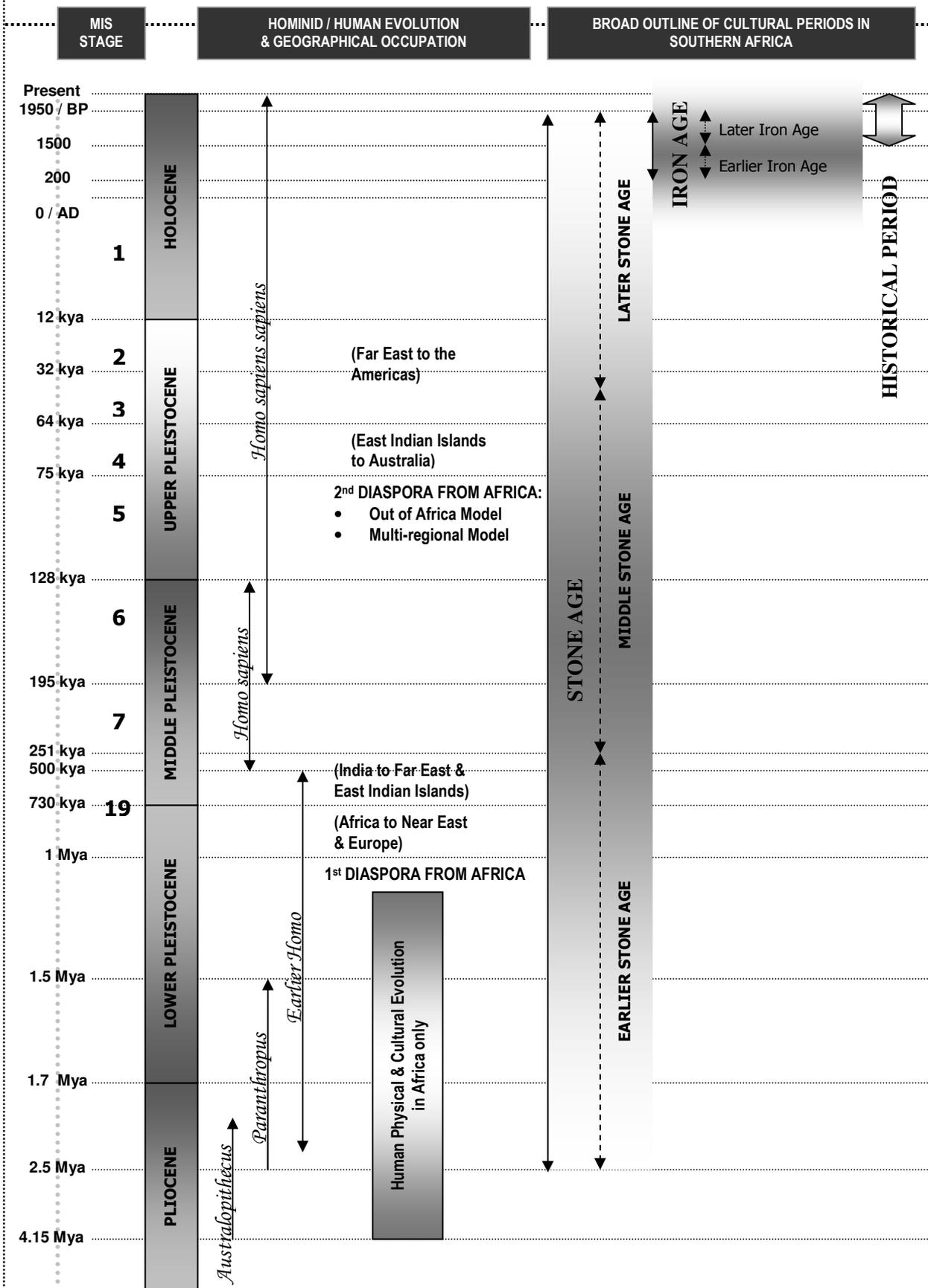
Class	Landform	Type 1	Type 2	Type 3
L1	Rocky surface	Bedrock exposed	Some soil patches	Sandy/grassy patches
L2	Ploughed land	Far from water	In floodplain	On old river terrace
L3	Sandy ground, inland	Far from water	In floodplain or near feature such as hill	On old river terrace
L4	Sandy ground, Coastal	>1 km from sea	Inland of dune cordon	Near rocky shore
L5	Water-logged deposit	Heavily vegetated	Running water	Sedimentary basin

Class	Landform	Type 1	Type 2	Type 3
L6	Developed urban	Heavily built-up with no known record of early settlement	Known early settlement, but buildings have basements	Buildings without extensive basements over known historical sites
L7	Lime/dolomite	>5 myrs	<5000 yrs	Between 5000 yrs and 5 myrs
L8	Rock shelter	Rocky floor	Sloping floor or small area	Flat floor, high ceiling
Class	Archaeo-logical traces	Type 1	Type 2	Type 3
A1	Area previously excavated	Little deposit remaining	More than half deposit remaining	High profile site
A2	Shell or bones visible	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick; shell and bone dense
A3	Stone artefacts or stone walling or other feature visible	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick

Table 2: Site attributes and value assessment (adapted from Whitelaw 1997)

Class	Attribute	Type 1	Type 2	Type 3
1	Length of sequence/context	No sequence Poor context Dispersed distribution	Limited sequence	Long sequence Favourable context High density of arte/ecofacts
2	Presence of exceptional items (incl regional rarity)	Absent	Present	Major element
3	Organic preservation	Absent	Present	Major element
4	Potential for future archaeological investigation	Low	Medium	High
5	Potential for public display	Low	Medium	High
6	Aesthetic appeal	Low	Medium	High
7	Potential for implementation of a long-term management plan	Low	Medium	High

Schematic Human Physical and Cultural Evolution in Africa



Extracts from the
National Heritage Resources Act (No 25 of 1999)

DEFINITIONS

Section 2

In this Act, unless the context requires otherwise:

- ii. “*Archaeological*” means –
 - a) material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures;
 - b) rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10 m of such representation;
 - c) wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the Republic,... and any cargo, debris, or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation.
- viii. “*Development*” means any physical intervention, excavation or action, other than those caused by natural forces, which may in the opinion of a heritage authority in any way result in a change to the nature, appearance or physical nature of a place, or influence its stability and future well-being, including –
 - a) construction, alteration, demolition, removal or change of use of a place or structure at a place;
 - b) carrying out any works on or over or under a place;
 - c) subdivision or consolidation of land comprising, a place, including the structures or airspace of a place;
 - d) constructing or putting up for display signs or hoardings;
 - e) any change to the natural or existing condition or topography of land; and
 - f) any removal or destruction of trees, or removal of vegetation or topsoil;
- xiii. “*Grave*” means a place of interment and includes the contents, headstone or other marker of such a place, and any other structure on or associated with such place;
- xxi. “*Living heritage*” means the intangible aspects of inherited culture, and may include –
 - a) cultural tradition;

- b) oral history;
 - c) performance;
 - d) ritual;
 - e) popular memory;
 - f) skills and techniques;
 - g) indigenous knowledge systems; and
 - h) the holistic approach to nature, society and social relationships.
- xxxi. “*Palaeontological*” means any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trances;
- xli. “*Site*” means any area of land, including land covered by water, and including any structures or objects thereon;
- xliv. “*Structure*” means any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith;

NATIONAL ESTATE

Section 3

- 1) For the purposes of this Act, those heritage resources of South Africa which are of cultural significance or other special value for the present community and for future generations must be considered part of the national estate and fall within the sphere of operations of heritage resources authorities.
- 2) Without limiting the generality of subsection 1), the national estate may include –
 - a) places, buildings, structures and equipment of cultural significance;
 - b) places to which oral traditions are attached or which are associated with living heritage;
 - c) historical settlements and townscapes;
 - d) landscapes and natural features of cultural significance;
 - e) geological sites of scientific or cultural importance
 - f) archaeological and palaeontological sites;
 - g) graves and burial grounds, including –
 - i. ancestral graves;
 - ii. royal graves and graves of traditional leaders;
 - iii. graves of victims of conflict
 - iv. graves of individuals designated by the Minister by notice in the Gazette;
 - v. historical graves and cemeteries; and
 - vi. other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No 65 of 1983)
 - h) sites of significance relating to the history of slavery in South Africa;
 - i) movable objects, including –

- i. objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
- ii. objects to which oral traditions are attached or which are associated with living heritage;
- iii. ethnographic art and objects;
- iv. military objects;
- v. objects of decorative or fine art;
- vi. objects of scientific or technological interest; and
- vii. books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1 xiv) of the National Archives of South Africa Act, 1996 (Act No 43 of 1996).

STRUCTURES

Section 34

- 1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

ARCHAEOLOGY, PALAEOLOGY AND METEORITES

Section 35

- 3) Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority.
- 4) No person may, without a permit issued by the responsible heritage resources authority –
 - a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
 - b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
 - c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or
 - d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assists in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.

- 5) When the responsible heritage resources authority has reasonable cause to believe that any activity or development which will destroy, damage or alter any archaeological or palaeontological site is under way, and where no application for a permit has been submitted and no heritage resources management procedure in terms of section 38 has been followed, it may –
 - a) serve on the owner or occupier of the site or on the person undertaking such development an order for the development to cease immediately for such period as is specified in the order;
 - b) carry out an investigation for the purpose of obtaining information on whether or not an archaeological or palaeontological site exists and whether mitigation is necessary;
 - c) if mitigation is deemed by the heritage resources authority to be necessary, assist the person on whom the order has been served under paragraph a) to apply for a permit as required in subsection 4); and
 - d) recover the costs of such investigation from the owner or occupier of the land on which it is believed an archaeological or palaeontological site is located or from the person proposing to undertake the development if no application for a permit is received within two weeks of the order being served.
- 6) The responsible heritage resources authority may, after consultation with the owner of the land on which an archaeological or palaeontological site or meteorite is situated, serve a notice on the owner or any other controlling authority, to prevent activities within a specified distance from such site or meteorite.

BURIAL GROUNDS AND GRAVES

Section 36

- 3) No person may, without a permit issued by SAHRA or a provincial heritage resources authority –
 - a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;
 - b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
 - c) bring onto or use at a burial ground or grave referred to in paragraph a) or b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.
- 4) SAHRA or a provincial heritage resources authority may not issue a permit for the destruction of any burial ground or grave referred to in subsection 3a) unless it is satisfied that the applicant has made satisfactory arrangements for the exhumation and re-interment of the contents of such

- graves, at the cost of the applicant and in accordance with any regulations made by the responsible heritage resources authority.
- 5) SAHRA or a provincial heritage resources authority may not issue a permit for any activity under subsection 3b) unless it is satisfied that the applicant has, in accordance with regulations made by the responsible heritage resources authority –
 - a) made a concerted effort to contact and consult communities and individuals who by tradition have an interest in such grave or burial ground; and
 - b) reached agreements with such communities and individuals regarding the future of such grave or burial ground.
 - 6) Subject to the provision of any other law, any person who in the course of development or any other activity discovers the location of a grave, the existence of which was previously unknown, must immediately cease such activity and report the discovery to the responsible heritage resources authority which must, in co-operation with the South African Police Service and in accordance with regulations of the responsible heritage resources authority –
 - a) carry out an investigation for the purpose of obtaining information on whether or not such grave is protected in terms of this Act or is of significance to any community; and
 - b) if such grave is protected or is of significance, assist any person who or community which is a direct descendant to make arrangements for the exhumation and re-internment of the contents of such grave or, in the absence of such person or community, make any such arrangements as it deems fit.

HERITAGE RESOURCES MANAGEMENT

Section 38

- 1) Subject to the provisions of subsections 7), 8) and 9), any person who intends to undertake a development categorised as –
 - a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
 - b) the construction of a bridge or similar structure exceeding 50 m in length;
 - c) any development or other activity which will change the character of a site –
 - i. exceeding 5 000 m² in extent; or
 - ii. involving three or more existing erven or subdivisions thereof; or
 - iii. involving three or more erven or subdivisions thereof which have been consolidated within the past five years; or

- iv. the costs which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
 - d) the rezoning of a site exceeding 10 000 m² in extent; or
 - e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority,
- must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.
- 2) The responsible heritage resources authority must, within 14 days of receipt of a notification in terms of subsection 1) –
 - a) if there is reason to believe that heritage resources will be affected by such development, notify the person who intends to undertake the development to submit an impact assessment report. Such report must be compiled at the cost of the person proposing the development, by a person or persons approved by the responsible heritage resources authority with relevant qualifications and experience and professional standing in heritage resources management; or
 - b) notify the person concerned that this section does not apply.
 - 3) The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection 2a) ...
 - 4) The report must be considered timeously by the responsible heritage resources authority which must, after consultation with the person proposing the development decide –
 - a) whether or not the development may proceed;
 - b) any limitations or conditions to be applied to the development;
 - c) what general protections in terms of this Act apply, and what formal protections may be applied, to such heritage resources;
 - d) whether compensatory action is required in respect of any heritage resources damaged or destroyed as a result of the development; and
 - e) whether the appointment of specialists is required as a condition of approval of the proposal.

APPOINTMENT AND POWERS OF HERITAGE INSPECTORS

Section 50

- 7) Subject to the provision of any other law, a heritage inspector or any other person authorised by a heritage resources authority in writing, may at all reasonable times enter upon any land or premises for the purpose of inspecting any heritage resource protected in terms of the provisions of this Act, or any other property in respect of which the heritage resources authority is exercising its functions and powers in terms of this Act, and may take photographs, make measurements and sketches and use any

other means of recording information necessary for the purposes of this Act.

- 8) A heritage inspector may at any time inspect work being done under a permit issued in terms of this Act and may for that purpose at all reasonable times enter any place protected in terms of this Act.
- 9) Where a heritage inspector has reasonable grounds to suspect that an offence in terms of this Act has been, is being, or is about to be committed, the heritage inspector may with such assistance as he or she thinks necessary –
 - a) enter and search any place, premises, vehicle, vessel or craft, and for that purpose stop and detain any vehicle, vessel or craft, in or on which the heritage inspector believes, on reasonable grounds, there is evidence related to that offence;
 - b) confiscate and detain any heritage resource or evidence concerned with the commission of the offence pending any further order from the responsible heritage resources authority; and
 - c) take such action as is reasonably necessary to prevent the commission of an offence in terms of this Act.

A heritage inspector may, if there is reason to believe that any work is being done or any action is being taken in contravention of this Act or the conditions of a permit issued in terms of this Act, order the immediate cessation of such work or action pending any further order from the responsible heritage resources authority.