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10 November 2014

Attention Bernadet Pawandiwa

Dear Ms Pawandiwa

Application for Exemption from a Phase 1 Heritage Impact Assessment

**Proposed Richards Bay Industrial Development Zone (RBIDZ),
Mbonambi Local Municipality, KwaZulu-Natal**

Project description

The strategic intent of the Richards Bay Industrial Development Company (IDC) is to create the RBIDZ in fulfilment of the fundamental objectives of the National Cabinet as proposed in September 2000, namely:

- ◆ to develop and establish a purpose built, world-class industrial park incorporating a delimited Customs Controlled Area and linked to the Richards Bay International Port,
- ◆ to provide quality infrastructure including transport, business and utility services,
- ◆ to attract foreign and local sustainable investment projects which create employment and export opportunities and,
- ◆ to promote foster and mentor BEE and SMME business opportunities around the zone.

The Richards Bay IDC has earmarked Phase 2A for future industrial development (Figure 1). The area measures approximately 1000 ha in extent and is currently planted to eucalyptus plantation in its entirety (Figure 2). Application is underway for its conversion from agriculture to industrial use.

[Figs loaded to SAHRIS]

Site assessment and observations

eThembeni staff conducted a field inspection of the proposed area between 28 and 31 August 2014. The greatest part of the study area is currently planted to eucalyptus plantation and has been for more than 35 years (pers.ob). In the course of silviculture practice forests are cyclically de-stumped when coppice regeneration is no longer viable. The consequence of mechanical de-stumping is massive soil upheaval and disturbance to the surface and root zone of the forest. Consequently, any archaeological remains within the study area will have been displaced out of their primary contexts.

The study area is underlain by deep aeolian sands and palaeo- dune fields, the consequence of advancing and receding shorelines during the course of the Pleistocene. Historically, the vegetation would have comprised a mosaic of sour grassland and riparian forest corridors between stands of swamp and coastal forest, seasonal pans and *Phragmites / Cyperus* lined lagoons, typical of the Indian Ocean Coastal Biome.

Iron Age farming community sites have been identified within the adjacent Richards Bay Minerals mining areas and there is no reason to suggest that they did occur within the current study area. However, an Iron Age archaeological footprint is to all intents and purposes invisible due to cyclical forest de-stumping and prevailing silviculture practices.

The SAHRIS Palaeontology Sensitivity Map places the scheme within a blue delimitation and thus of low palaeontological potential. No further palaeontological mitigation is required.

The heritage resource of prime concern is unmarked ancestral graves. All graves are accorded the highest level of protection and may not be disturbed without both family consent and a permit from Amafa. During the field inspection, no graves were observed. Burials may have taken place in proximity to Forestry labour compounds in the recent past and would be the subject of the graves protocol as described below.

Recommendations

With regard to the possibility of graves being discovered in the course of development activities it is recommended that the following protocol be made binding in the Record of Decision (R.o.D.):

“During the Public Participation Processes, the project Community Liaison Officer (CLO) and the Environmental Control Officer (ECO) shall engage with stakeholders to ascertain the presence of unmarked or invisible grave sites. Local Mbonambi and Sokhulu traditional leadership should also be participant in these engagements or at least informed.

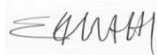
Any identified grave sites should ideally be left with a twenty metre (20m) buffer from construction activities and be fenced pending engagement with the relevant Authorities and any identified family members having an association or interest in the grave. In the event of unintentional exposure of a grave or a request from a family for exhumation and re-interment the CLO/ECO shall immediately contact Amafa/KZN Heritage to obtain the necessary protocols and procedures for the management of such human remains”.

It is our considered opinion that the potential impact to heritage resources through implementation of the IDZ is very low. On the basis of the foregoing it is requested that the proposed project area be exempt from the requirements of a full Phase 1 Heritage Impact Assessment.

Please could you convey Amafa’s decision on this matter to the appointed Environmental Assessment Practitioner, Ms. Kathryn de Jong, of **GIBB Science and Engineering**.

Email: kdejong@gibb.co.za

Yours sincerely



Len van Schalkwyk and Elizabeth Wahl