eTHEMBENI CULTURAL HERITAGE

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16 January 2016

Attention Bernadet Pawandiwa

Dear Ms Pawandiwa

Application for Exemption from a Phase 1 Heritage Impact Assessment

Proposed cultivation of 19,5 ha of fallow land for maize and bean production
Khanyani Agricultural Co-operative
KwaMkhize Traditional Council, Imbabazane LM, KwaZulu-Natal.

Project Area and Project description[1]

Khanyani Agricultural Cooperative is a crop producing community owned enterprise, located on a portion of land owned by KwaMkhize Traditional Council, in the Imbabazane local municipality, KwaZulu Natal. The Agricultural Cooperative consists of twelve community members and is led by Bongani Mnculwane. Khanyani Agricultural Cooperative proposes to farm 10 ha of maize and 9.5 ha of bean crops thus making it 19.5 ha of the farm which was given to them by KwaMkhize traditional Council for the purpose of farming.

There is a guaranteed market for maize and bean crops in the area in which the Agricultural Cooperative operates. The crops grown are not only for consumption but the surplus will be sold to make a profit. The Agricultural Cooperative currently has a written off-take agreement with a local buyer, Macksons, to buy their produce as well as there is demand from surrounding villages.

Khanyani Agricultural Cooperative will employ a total of twelve employees, nine of which will be responsible for the crops and three of which will be responsible for the administration of the Agricultural Cooperative. In terms of capacity building, the employees will undergo training for crop production and gain skills in monitoring and harvesting crops. Khanyani Agricultural Cooperative could contribute to the viability of the crop to the local community.

Observations

The Basic Assessment for this project is triggered by NEMA EIA Regulations in terms of GN. R 983, 8 (27): the clearance of more than 1 ha of indigenous vegetation, in this case within the grassland biome.

The proposed maize and bean production is in keeping with the current agrarian landscape and associated activities.

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CSIR Reference Number:CSIR/CAS/EMS/IR/2015/00011/A

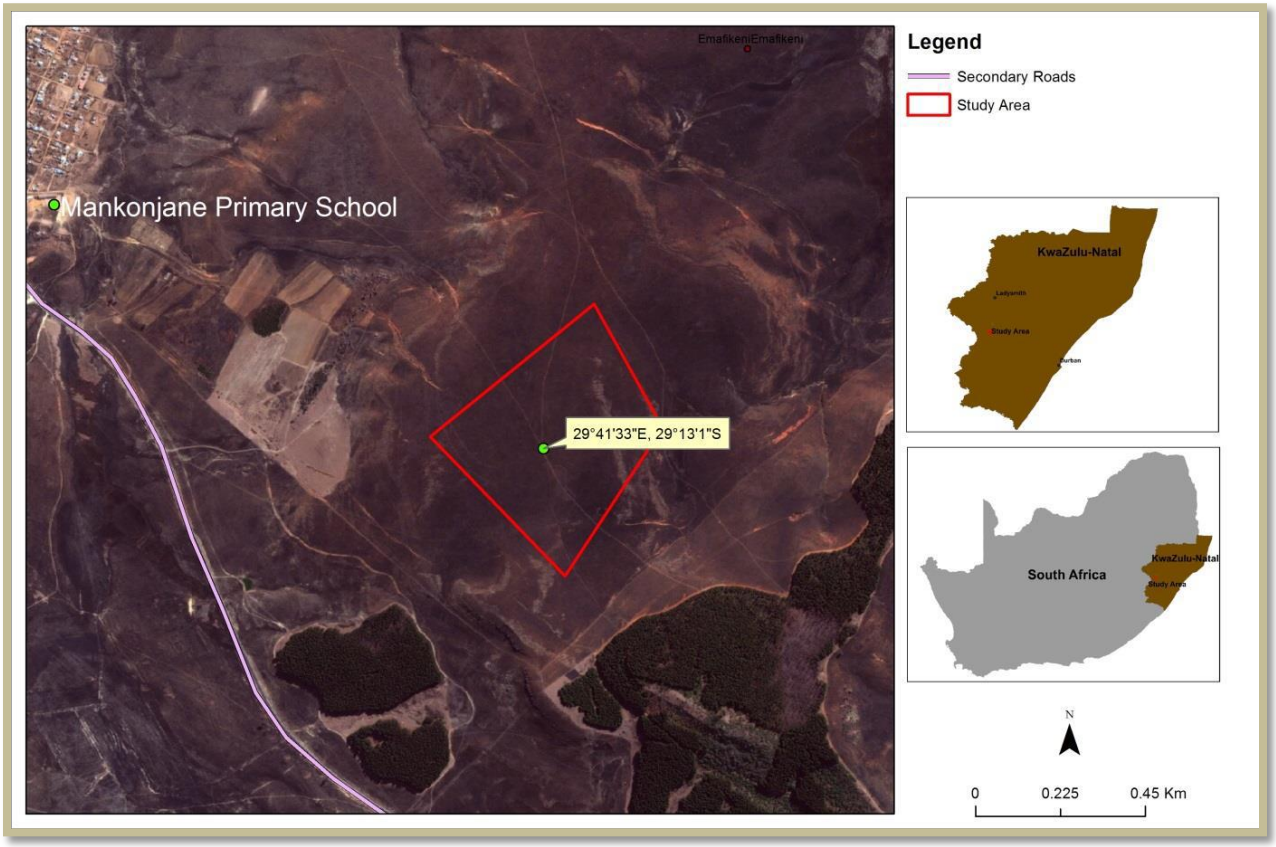
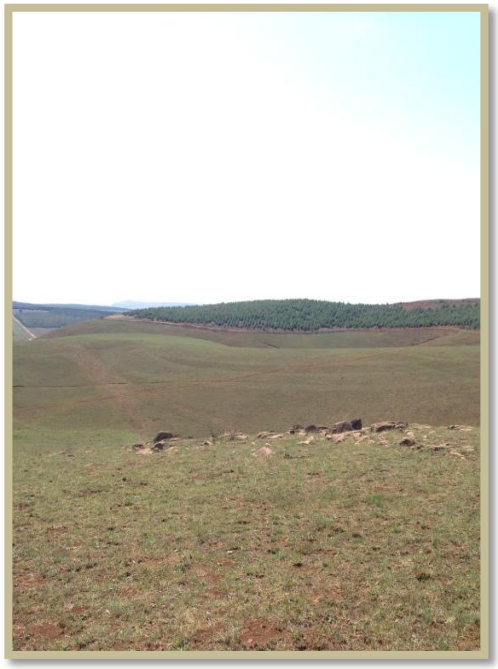


Figure 1 **Location of the Khanyani Agricultural Cooperative Project Site**



Figures 2 and 3 **Virgin grassland proposed for maize and bean cultivation**

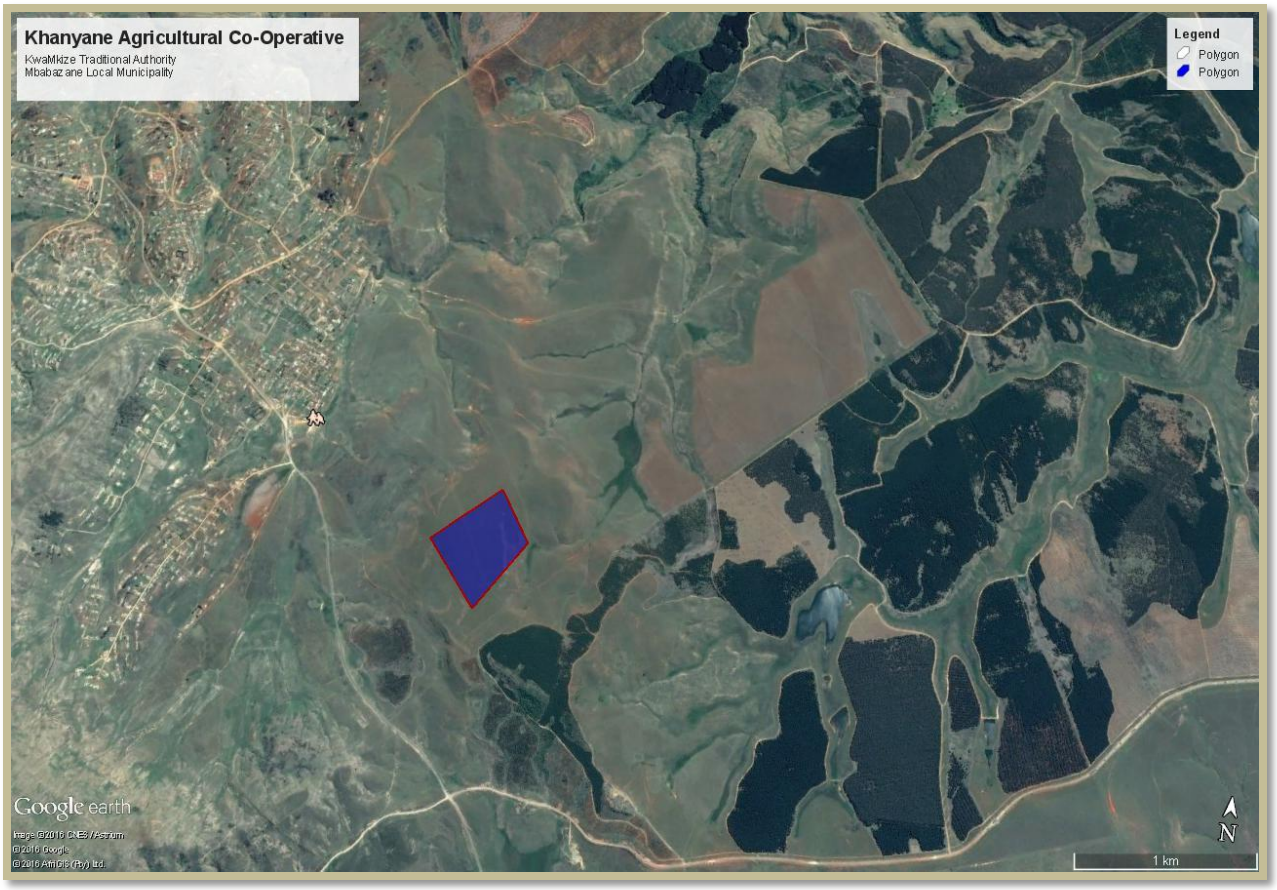


FIGURE 4 **Khanyani land allocation within the local environment**

The archaeological footprint of the Drakensberg Foothill Moist Grasslands themselves (*sensu* Mucina and Rutherford 2006)[2] is understood to be low (KZN Museum Archaeology Data Base). Whilst Stone Age hunter gatherer sites abound in the adjacent Stormberg Group lithology of the lower Drakensberg, Iron Age settlement of the central Drakensberg grasslands only occurred to any extent in the mid to late 19th Century. This was largely due to the settlement actions of Theophilus Shepstone[3] and his establishment of Native Reserves for tribal groups displaced by expansion of the Zulu Kingdom and the effects of the *mfecane*[4]. The immediate area around the land allocated to the Khanyani Co-operative is extensively underlain with dolerite sills which present at the surface as contiguous boulder beds. Such exposed dolerite is eschewed for settlement in traditional society due to the incidence of lightning strikes. Consequently, no significant archaeological remains were anticipated..

No historical graves are reported by the project proponents, who are residents of the adjacent local communities.

The SAHRIS Palaeontology sensitivity map indicates the area to be of insignificant sensitivity (grey). The Khanyani land allocation lies on Beaufort Group basement (comprising mud and sandstones that are

[2] 2006. Mucina, L., Rutherford, M.C. (Eds.), The vegetation of South Africa, Lesotho and Swaziland.SANBI. Pretoria
[3] 2013. Jeff Guy. Theophilus Shepstone and the Forging of Natal: UKZN Natal Press. Pietermaritzburg
[4] 1979. Jeff Guy.The Destruction of the Zulu Kingdom. UKZN Press. Pietermaritzburg

potentially fossil rich). However, the extensive underlay of intrusive dolerite sills[5] has negated the possibility of significant fossil remains. Weathering of the dolerite basement has produced the relatively deep red soils sought after for the proposed agricultural activities. Consequently no further palaeontology assessment or monitoring is recommended.

Recommendations

Accordingly, we request that Amafa grant an exemption from an HIA for the proposed agricultural activities and local community upliftment project, allowing the enterprise to proceed with no further heritage resource mitigation.

In this regard, please can you notify us timeously via the loaded SAHRIS case file as to the decision of Amafa.

Yours sincerely

Len van Schalkwyk
Principle Investigator.

[5] Groenewald. G. 2012. Palaeontological Technical Report for KwaZulu-Natal. Unpublished. Amafa aKwaZulu-Natali.