



PROJECT NAME:

THE PROPOSED WILD Coast SPECIAL ECONOMIC ZONE, MTHATHA IN THE EASTERN CAPE PROVINCE OF SOUTH AFRICA

REPORT TITLE:

PHASE 1 HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED WILD Coast SPECIAL ECONOMIC ZONE, MTHATHA IN THE EASTERN CAPE PROVINCE OF SOUTH AFRICA

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EXECUTIVE SUMMARY

This executive summary aims to facilitate management decisions and provide specific results quickly. Rather than repeating all the information in the report, the summary focuses on its conclusions. The study focuses on the proposed Wildcoast Special Economic Zone located in Mthatha in the Eastern Cape province.

SCOPE OF WORK

This heritage impact investigation was conducted to determine the impacts on heritage resources within the study area. The following objectives structured the assessment:

- To produce a desk-top investigation in the area.
- To complete a site inspection of the proposed area of development.
- To identify possible archaeological, cultural, and historical sites within the proposed area of development.
- To evaluate the potential impacts of construction and operation of the proposed development on archaeological, cultural, built and historical sites within the proposed area and,
- To recommend mitigation measures to alleviate any negative impacts on areas of archaeological, cultural, built and historical importance.
- To conduct public participation for the discovered heritage materials.

The study's primary purpose is to determine the possible occurrence of cultural heritage significance within the proposed development area. This study is based on archival or document searches combined with fieldwork investigations.

FINDINGS

The field investigation discovered six fenced informal graveyards containing a total of seven marked by headstones graves and 4 unmarked graves. The specifications and more information of the graveyards will be discussed in the findings chapter.

RECOMMENDATION

The assessment of the impact of the construction on the graves will be detrimental and it is therefore recommended that they get relocated to a much safer place to allow for the proposed development.



Table 1: Requirements for specialist reports, as detailed in the NEMA Act No. 25 of 2014.

NEMA Regulation (2014)	Relevant section in the report
Details of the specialist who prepared the report	Page (vii) of the report- Project management
The expertise of that person to compile a specialist report, including a curriculum vitae	Section 1.5
A declaration that the person is independent in a form as may be specified by the competent authority	Page (vi) of the report
An indication of the scope of, and the purpose for which the report was prepared	Section 1.4
The date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 4.3
A description of the methodology adopted in preparing the report or carrying out the specialized process	Section 4
The specific identified sensitivity of the site related to the activity and its associated structures and infrastructure	Not applicable
An identification of any areas to be avoided, including buffer	Section 5

NEMA Regulation (2014)	Relevant section in the report
A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Section 5
A description of any assumptions made and any uncertainties or gaps in knowledge	Section 3



NEMA Regulation (2014)	Relevant section in the report
Any mitigation measures for inclusion in the EMPr	Section 5
Any conditions for inclusion in the environmental authorization	Section 11
Any monitoring requirements for inclusion in the EMPr or environmental authorization	None
A reasoned opinion as to whether the proposed activity or portions thereof should be authorized and	Section 11
If the opinion is that the proposed activity or portions thereof should be authorized, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	
A description of any consultation process that was undertaken during the course of carrying out the study	Section 8
A summary and copies if any comments that were received during any consultation process	None Formal consultation was conducted by the Environmental consultants and the heritage aspects were covered. No comments were made by the public
Any other information requested by the competent authority	None



DECLARATION OF INDEPENDENCE

I, **Jennifer Munyai neé Mokakabye**, declare that –

- I act as the independent heritage practitioner in this application
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favorable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting heritage impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity
- I will comply with the Act, Regulations, and all other applicable legislation.
- I will consider, to the extent possible, the matters listed in section 38 of the NHRA when preparing the application and any report relating to the application
- I have no, and will not engage in, conflicting interests in the undertaking of the activity.
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority.
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favorable to the applicant or not
- All the particulars furnished by me in this form are true and correct;
- I will perform all other obligations as expected from a heritage practitioner in terms of the Act and the constitutions of my affiliated professional bodies; and
- I acknowledge that a false declaration is an offence in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the NEMA.



DISCLOSURE OF VESTED INTEREST

I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the regulations.

PROJECT MANAGEMENT

Site name and location: Proposed Wild coast Special Economic Zone

Municipal Area: King Sabata Dalindyebo Local Municipality in the O.T Tambo District Municipality

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GLOSSARY OF TERMS

The following terms used in this Archaeology are defined in the National Heritage Resources Act [NHRA], Act Nr. 25 of 1999, South African Heritage Resources Agency [SAHRA] Policies as well as the Australia ICOMOS Charter (*Burra Charter*):

Archaeological Material: remains resulting from human activities, 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.

Artifact: Any movable object that has been used, modified, or manufactured by humans.

Conservation: All the processes of looking after a site/heritage place or landscape including maintenance, preservation, restoration, reconstruction, and adaptation.

Cultural Heritage Resources: refers to physical cultural properties such as archaeological sites, palaeontological sites, historic and prehistorical places, buildings, structures, and material remains cultural sites such as places of rituals, burial sites or graves and their associated materials, geological or natural features of cultural importance or scientific significance. This includes intangible resources such as religious practices, ritual ceremonies, oral histories, memories indigenous knowledge.

Cultural landscape: “the combined works of nature and man” and demonstrate “the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both internal and external”.

Cultural Resources Management (CRM): the conservation of cultural heritage resources, management, and sustainable utilization and present for present and for the future generations

Cultural Significance: is the aesthetic, historical, scientific, and social value for past, present and future generations.

Chance Finds: means Archaeological artifacts, features, structures, or historical cultural remains such as human burials that are found accidentally in context previously not identified during cultural heritage scoping, screening and assessment studies. Such finds are usually found during earthmoving activities such as water pipeline trench excavations.

Compatible use: means a use, which respects the cultural significance of a place. Such use



involves no, or minimal, impact on cultural significance.

Conservation means all the processes of looking after a place so as to retain its cultural significance.

Expansion: means the modification, extension, alteration or upgrading of a facility, structure, or infrastructure at which an activity takes place in such a manner that the capacity of the facility or the footprint of the activity is increased.

Grave: A place of interment (variably referred to as burial), including the contents, headstone, or other markers of such a place, and any other structure on or associated with such a place.

Heritage Impact Assessment (HIA): Refers to the process of identifying, predicting and assessing the potential positive and negative cultural, social, economic and biophysical impacts of any proposed project, plan, program or policy which requires the authorization of permission by law and which may significantly affect the cultural and natural heritage resources. The HIA includes recommendations for appropriate mitigation measures for minimizing or avoiding negative impacts, measures enhancing the positive aspects of the proposal and heritage management and monitoring measures.

Historic Material: remains resulting from human activities, which are younger than 100 years, but no longer in use, including artefacts, human remains, and artificial features and structures.

Impact: the positive or negative effects on human well-being and/or on the environment.

In situ material: means material culture and surrounding deposits in their original location and context, for instance, archaeological remains that have not been disturbed.

Interested and Affected Parties: Individuals, communities, or groups, other than the proponent or the authorities, whose interests may be positively or negatively affected by the proposal or activity and/ or who are concerned with a proposal or activity and its consequences.

Interpretation: means all the ways of presenting the cultural significance of a place.

Late Iron Age: this period is associated with the development of complex societies and state systems in southern Africa.

Material Culture means buildings, structure, features, tools, and other artifacts that constitute the remains from past societies.



Mitigate The implementation of practical measures to reduce adverse impacts or enhance beneficial impacts of an action.

Place: means site, area, land, landscape, building or other work, a group of buildings or other works, and may include components, contents, spaces, and views.

Protected Area: means those protected areas contemplated in section 9 of the NEMPAA and the core area of a biosphere reserve and shall include their buffers.

Public Participation Process: A process of involving the public to identify issues and concerns and obtain feedback on options and impacts associated with a proposed project, program, or development. Public Participation Process in terms of NEMA refers to a process in which potential interested and affected parties are given an opportunity to comment on or raise issues relevant to specific matters.

Setting: means the area around a place, which may include the visual catchment.

Significance: can be differentiated into impact magnitude and impact significance. Impact magnitude is the measurable change (i.e. intensity, duration, and likelihood). Impact significance is the value placed on the change by different affected parties (i.e. the level of significance and acceptability). It is an anthropocentric concept, which makes use of value judgments and science-based criteria (i.e. biophysical, physical cultural, social and economic).

Site: a spatial cluster of artifacts, structures, and organic and environmental remains, as residues of past human activity.

LIST OF ABBREVIATIONS

BP.....	Before Present
EIA.....	Early Iron Age
ESA.....	Early Stone Age
GPS.....	Geographic Positioning System
HIA.....	Heritage Impact Assessment
LIA.....	Late Iron Age
LSA.....	Late Stone Age
MYA.....	Million Years Ago
MSA.....	Middle Stone Age



NWPHRA.....Northwest Provincial Heritage Resource Authority
NHRA.....National Heritage Resources Act no 22 of 1999
SAHRA.....South African Heritage Resource Agency
S&EIR..... Scoping & Environmental Impact Reporting



1. INTRODUCTION

Abantu Environmental Services was appointed by Coega Development Corporation (CDC) to undertake a Phase I Heritage Impact Assessment (HIA) investigation for the proposed Wildcoast Special Economic Zone for the Northern Section located at the King Sabata Dalindyebo Local Municipality of O.R Tambo District Municipality in the Eastern Cape province of South Africa. The investigation was designed to identify the possible occurrence of cultural heritage resources/materials within the proposed development area. The study results were gathered through archival or document searches together with fieldwork investigations.

In support of the Environmental Impact Assessment that was conducted on the 28th of October 2018 (**REF:14/12/16/3/3/2/1064**) conducted an HIA study to ensure compliance with section 38(1) of the South African Heritage Resources Act (SAHRA) (25 of 1999) and section 38(8) of the National Heritage Resource Act, 1999 (Act 25 of 1999) (NHRA). Furthermore, for Coega Development Corporation to obtain the necessary heritage permit for the proposed project.

1.1 Project background

1.1.1 Project Overview

The Department of Trade and Industry (DTI) developed the SEZ Policy to support and accelerate industrial development in target regions where socio-economic growth has been problematic. The intended development will be agricultural land use and a mixed use development comprising: hotel and conferences, commercial land, industrial land use and intensive farming and business process outsourcing. This would be achieved by providing specific measures needed to develop targeted industrial and agricultural capabilities and to attract targeted foreign and domestic direct investment. The SEZ Policy has four (4) specific objectives:

- Support the development of targeted industrial capabilities and attract foreign and domestic direct investment in support of the Industrial Policy Action Plan (IPAP) and Provincial Industrial Development Strategies (PIDSs) under the overarching National Development Plan (NDP)
- Develop world class of industrial infrastructure in line with requirements the target industries and investments;
- Promoting the processing and further value creation of the country's mineral and agricultural resources and
- Contributing to the creation of sustainable jobs and increasing exports of processed raw



materials in the target regions

The Wild Coast Special Economic Zone (WCSEZ) is intended to address the under-development of industry and agriculture in the Wild Coast region, the elevated unemployment levels, particularly among the youth, and unacceptable high levels of poverty. The viability of the proposed WCSEZ will depend on the suggested approach, which will be phased.

1) Phase 1 mainly Sector development cluster (Agro-processing Sector) housing facilities to unlock the primary sector with the hub near Mthatha Airport.

2) Phase 2 Services Sector that will focus on the support industries for Agro-processing. This could include Logistics and Distribution, Business Process Outsourcing (BPO), Call Centres and others.

Further investigations need to be done to enhance the value proposition and viability of this Sector. This second Phase will also contain value added support infrastructure such as accommodation, skills and training centre, a commercial node and innovation and industrial services nodes.

It is envisioned that increased commercial activity in the area will assist in the development of the tourism sector.

1.1.2 Project Location

The proposed development is located immediately adjacent to the existing Mthatha Airport, northwest of the city of Mthatha in South Africa's Eastern Cape province (figure 1). The entire proposed area of development is surrounded by vegetation. Due to the wetland that has occupied almost 80% of the proposed development, the area is concentrated by water reeds and water grass (Figure 3). The area is surrounded by houses on the Northern and western side (figure 4) as well as the Mthatha dam (figure 5).

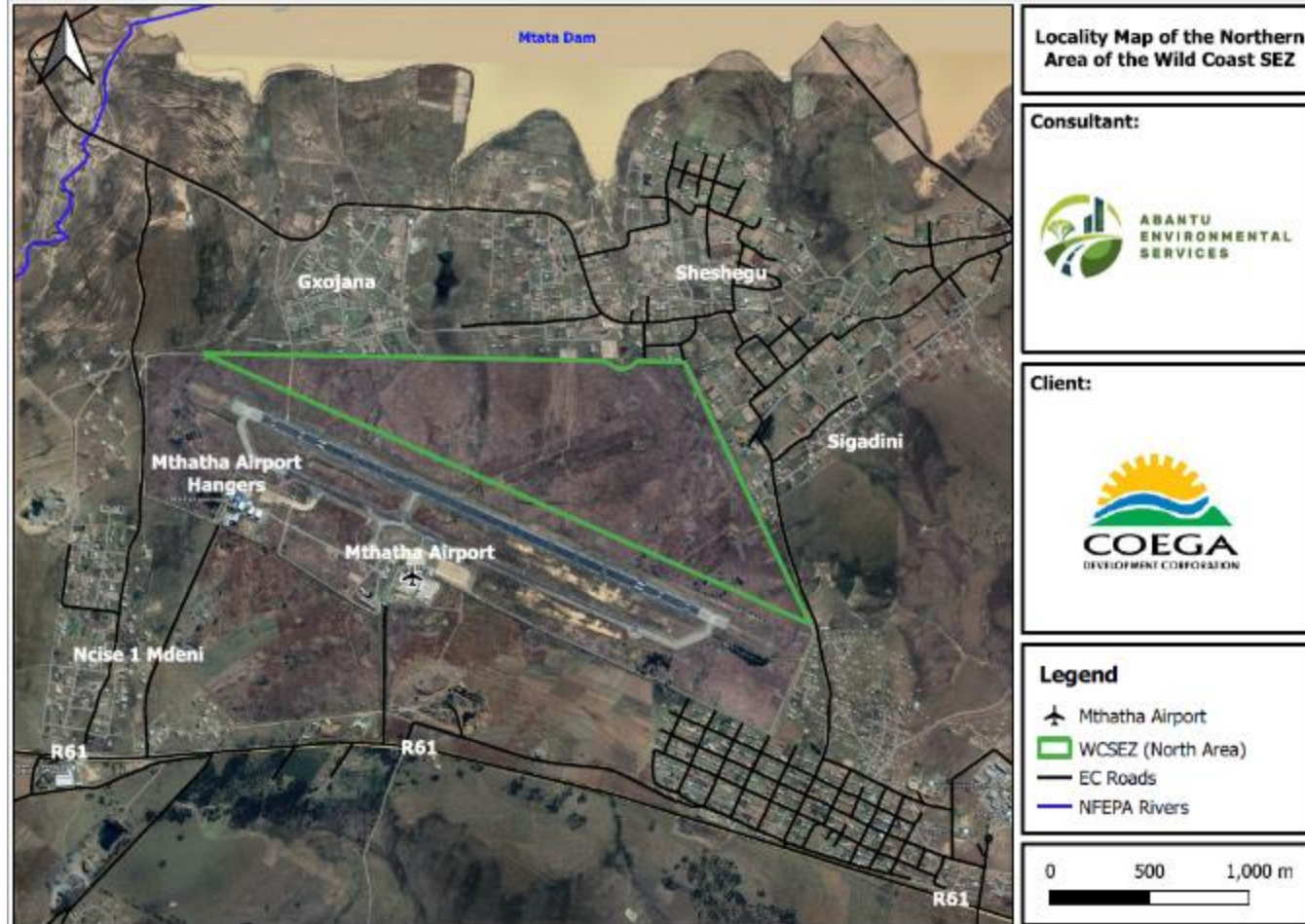


Figure 1: Locality map of the proposed area of development



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Figure 2: Overview of the proposed area of development



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Figure 3: View of the water reeds and water grass



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Figure 4: Overview of the houses surrounding the proposed area of development



Figure 5: View of of Mthatha dam

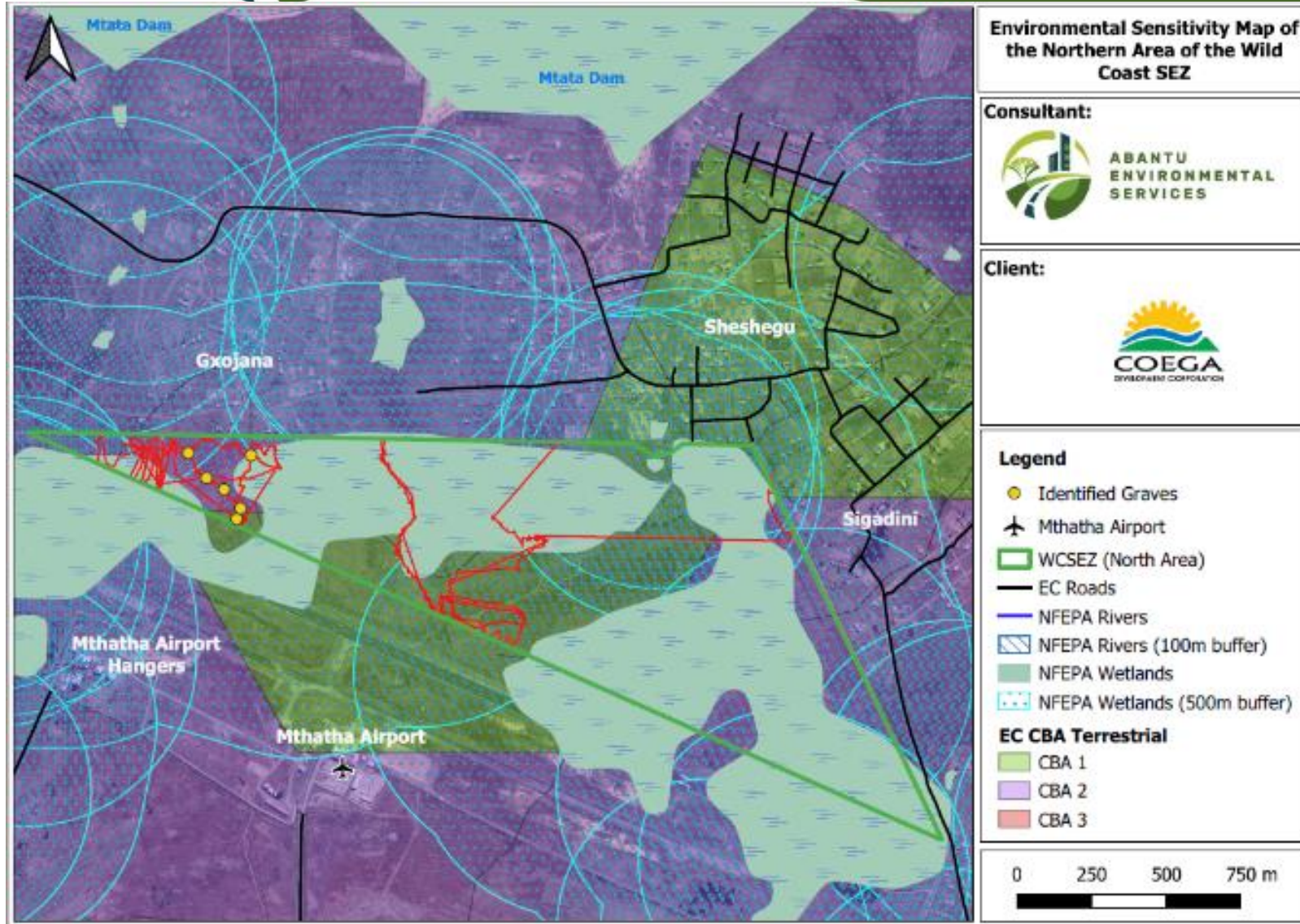


Figure 6: Environmental sensitivity map of the proposed area of development

1.2 GPS track path

GPS track path is used to provide proof of the areas traversed during the field survey. Due to the wetland that has covered almost 80% of the area, some areas were not accessed.

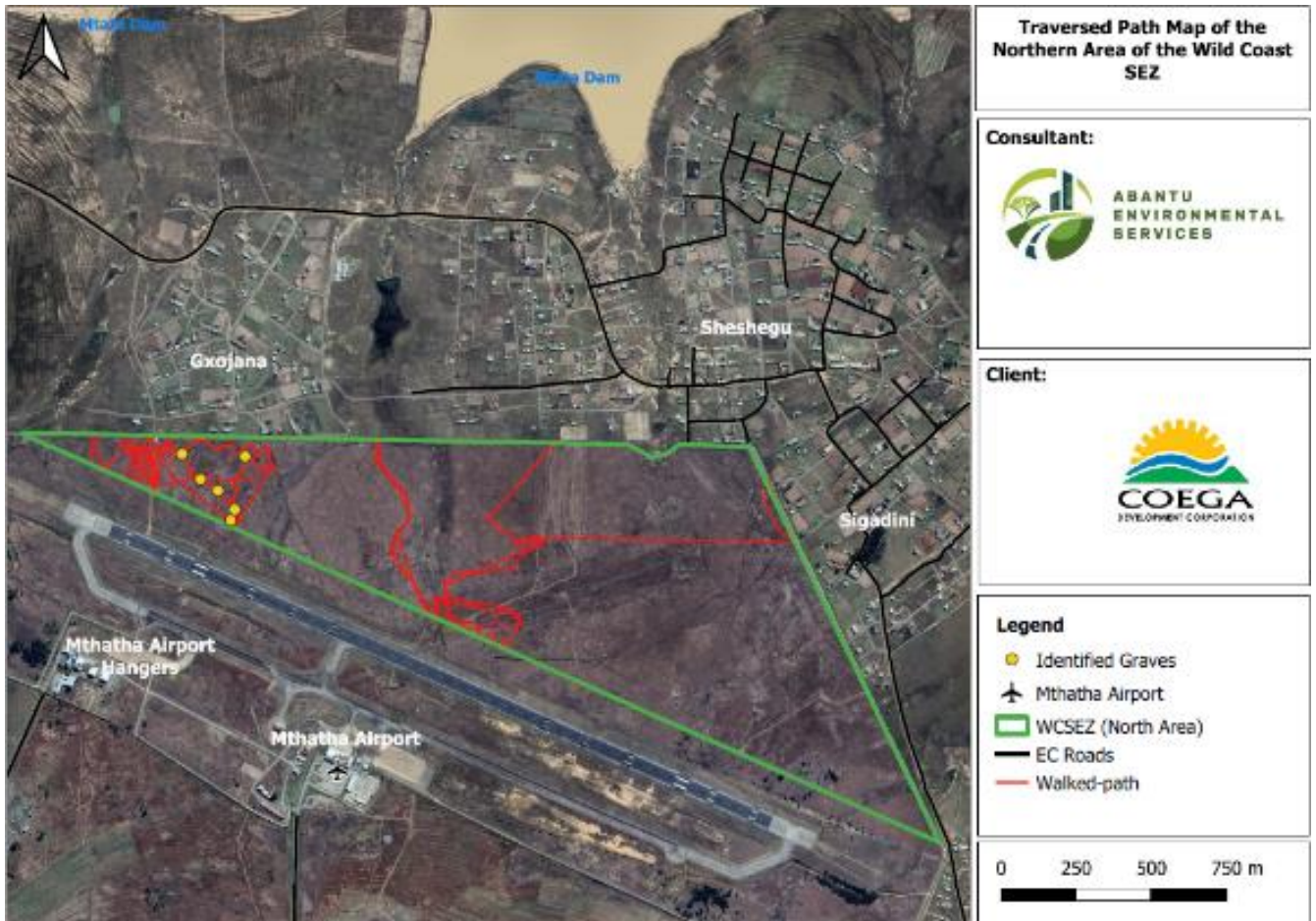


Figure 7: Walk path traversed during the field survey

1.3 Terms of reference

Coega Development Corporation appointed Abantu Environmental Services as the specialist heritage practitioners to undertake HIA studies to comply with the requirements for section 38(1) of the South African Heritage Resources Act (SAHRA) (25 of 1999) and Section 38(8) of the National Heritage Resource Act, 1999 (Act 25 of 1999) (NHRA). As well as for Coega Development Corporation to comply with Environment Conservation Act, 1989 (Act 73 of 1989), or the integrated environmental management guidelines issued by the Department of Environment Affairs and Tourism, or the Minerals Act, 1991 (Act 50 of 1991), or any other legislation.



1.4 Scope of work

A Heritage Impact Assessment study was conducted to determine the impacts on heritage resources within the study area. Below are the tasks that were conducted as part of the investigation:

- A desk-top investigation of the area.
- A site inspection of the proposed area of development.
- Identification of possible archaeological, cultural, and historical sites within the proposed area of development.
- An evaluation of the potential impacts of construction and operation of the proposed development on archaeological, cultural, built, and historical sites within the proposed area and
- A recommendation of measures to mitigate any negative impacts on areas of archaeological, cultural, built, and historical importance.
- Conduct public participation to address the issues of graves found in the proposed development.

1.5 Expertise of the Specialist

Jennifer Munyai neé Mokakabye has nine years' experience in the heritage sector. Previously employed by several consulting companies, she is highly experienced in terms of heritage assessment, archaeological mitigation, grave relocations, rescue excavation and the application of the NHRA section.

She holds a Bachelor of Environmental Sciences degree, Bachelor of Arts Honors in Archaeology (*Cum-laude*) and Master of Arts in Ethno-Archaeology, all of which were obtained from the University of Venda. Jennifer also completed various short courses such as Forensic Anthropology and Archaeology from Durham University (2020), How to do Archaeology from DigVentures (2020) and Heritage Resource Management course with the University of Cape Town (2021).

She is a published author of ten peer-reviewed articles, three non reviewed as well as a chapter in a book. She is a professional member of the Association of Southern African Archaeologist (ASAPA) and accredited by the association's Cultural Resources Management (CRM). Jennifer is also affiliated



with AMAFA as a professional heritage specialist and is a member of the South African Archaeologist Society, KZN region.

2. LEGISLATIVE AND POLICY FRAMEWORK

The identification, evaluation and assessment of any cultural heritage site, artefact or find in the South African context is required and governed by the following legislation:

- National Environmental Management Act (NEMA) Act 107 of 1998
- National Heritage Resources Act (NHRA) Act 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
- Development Facilitation Act (DFA) Act 67 of 1995

The following sections in each Act refer directly to identifying, evaluating, and assessing cultural heritage resources.

- National Environmental Management Act (NEMA) Act 107 of 1998
 - a. Basic Environmental Assessment (BEA) – Section (23) (2)(d)
 - b. Environmental Scoping Report (ESR) – Section (29) (1)(d)
 - c. Environmental Impacts Assessment (EIA) – Section (32) (2)(d)
 - d. Environmental Management Plan (EMP) – Section (34) (b)
- National Heritage Resources Act (NHRA) Act 25 of 1999
 - a. Protection of Heritage Resources – Sections 34 to 36; and
 - b. Heritage Resources Management – Section 38
- Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002a. Section 39(3)

As per the NHRA, it is prohibited to disturb cultural heritage resources without the permission of the relevant heritage authority. The NHRA states in Section 34 (1) that "no building or part of a building which is older than 60 years may be altered or demolished without a permit from the relevant provincial heritage authority...". According to the NEMA (Act No 107 of 1998), an integrated EMP should (23: 2 (b)) identify, predict and evaluate the impact on the environment, socio-economic conditions and cultural heritage. In addition to incorporating legislative requirements and EIA rating criteria, the regulations of SAHRA and



ASAPA have also been incorporated to ensure a comprehensive, legally compatible HIA report.

3. ASSUMPTIONS AND LIMITATIONS

The limitations and assumptions associated with this heritage impact assessment are as follows:

- Whilst every attempt was made to obtain the latest available information. The reviewed literature does not represent an exhaustive list of information sources for the various study areas.
- Archaeological materials commonly occur at subsurface levels. The assessors may not adequately record or document these types of materials without destructive and intrusive methodologies. Therefore, the reviewed literature, previously completed assessments, and the field survey results are in themselves limited to surface observations.
- It is assumed that the information provided by the client is correct and up to date.
- Field investigations were executed on foot by an archaeologist from Abantu Environmental Services in the proposed development area.
- Accessibility to most parts of the proposed development area were a challenge due to water while few parts were easily accessed.
- The field survey and archival search did not include the paleontological aspect.

4. METHODOLOGY

4.1 Inventory

Inventory studies involve the in-field survey and recording of archaeological resources within a proposed development. The nature and scope of this type of study is defined predominantly by the results of the overview study. In the case of site-specific developments, direct implementation of an inventory study may preclude the need for an overview.

There are several different methodological approaches of conducting inventory studies. Therefore, in collaboration with the Heritage consultant, the developer should develop an inventory plan for review and approval by the SAHRA prior to implementation

4.2 Evaluating Heritage Impacts

A combination of document research and the determination of the geographic suitability of areas and



the evaluation of aerial photographs determined which areas could and should be accessed. After plotting the site on a GPS, the area was accessed by foot. The site was documented by digital photographs using Canon EOS 1300D, and geo-located with GPS reading using GPS application downloaded on an Android phone.

All this information was combined with information from an extensive literature review and the result of archival studies based on SAHRIS database. This HIA relies heavily on the analysis of written documents, maps, aerial photographs, and other archival sources combined with the results of site investigations.

4.3 Fieldwork and Report Compilation

Fieldwork investigation was conducted from the 29th of September to the 2nd October 2022 by an archaeologist from Abantu Environmental Services accompanied by the Abantu intern as well as the airport personnel. The fieldwork was conducted on foot in the proposed development footprint of Wild coast Special Economic Zone located at the King Sabata Dalindyebo Local Municipality of O.R Tambo District Municipality in the Eastern Cape province of South Africa with the aim of identifying any heritage and cultural related materials/artifacts. The survey was tracked using GPS and a path tracking app (Figure 6). The study area was surveyed using standard archaeological surveying methods. The gathered information from archival and site surveys was then merged and compiled into this report.

5. FIELD FINDINGS

Field survey was only limited to the proposed Wild coast Special Economic Zone located under the King Sabata Dalindyebo local municipality situated under O.R Tambo district municipality in the Eastern Cape province. In terms of the area's-built environment (Section 34), no standing structures older than 60 years occur within the study area. Before construction, no further mitigation is recommended in terms of Section 34 for the proposed development to proceed.



In terms of Section 36 of the Act, six fenced graveyards were discovered on site, some with more than one headstone. The informal graveyard had a total of 7 marked graves and 4 unmarked graves making them 11 in total. The graveyards are a bit scattered around the proposed area of development. The below table indicates the graves along with their co-ordinates.



Table 2: Field findings

Finding name	Coordinates	Description	Image
Abantu 01	31°32'22.83"S 28°39'58.14"E	This informal graveyard is fenced with two graves inside. The graves are marked by single stones facing the Southern direction (the airport)	 Figure 8: First fenced informal graveyard 





Finding name	Coordinates	Description	Image
Abantu 02	31°32'22.53"S 28°39'58.02"E	This is the second fenced informal graveyard. The graveyard only has one grave marked by the stone representing a stonehead like the previous one.	<p>Figure 9: The two graves marked by two stones</p>  <p>Figure 10: One grave marked by one stone</p>
Abantu 03	31°32'26.60"S 28°40'2.73"E	This informal fenced graveyard contains only one grave with one visible headstone represented by a rock	 <p>Figure 11: One grave marked by stone</p>



Finding name	Coordinates	Description	Image
Abantu 04	31°32'28.47"S 28°40'4.72"E	The forth informal graveyard has three graves all marked by rocks facing the Mthatha airport. The graves are a bit apart from each other.	 <p>Figure 12: Fenced forth informal graveyard</p>  <p>Figure 13: The first of the three grave</p>



Finding name	Coordinates	Description	Image
Abantu 05	31°32'29.77"S 28°40'4.36"E	This fenced informal graveyard possesses no informal markings. The possibility of the fencing been a graveyard was relied upon by the INFORMATION GIVEN BY Coega personnel.	 <p data-bbox="1106 745 1554 772">Figure 14: Informal grave with no marking</p>
Abantu 06	31°32'23.00"S 28°40'6.07"E	The sixth fenced informal graveyard has no markings to indicated the number of graves. It is assumed to be a graveyard because the informal consultation with the guards as well as Coega personnel had indicated so.	 <p data-bbox="1106 1240 1659 1267">Figure 15: Assumed to be a grave with no markings</p>



6. APPLICABLE HERITAGE LEGISLATION

Several legislations provide the legal basis for protecting and preserving cultural and natural resources. These include the National Environment Management Act (No. 107 of 1998); Mineral Amendment Act (No 103 of 1993); Tourism Act (No. 72 of 1993); Cultural Institution Act (No. 119 of 1998), and the National Heritage Resources Act (Act 25 of 1999). Section 38 (1) of the National Heritage Resources Act requires that where relevant, an Impact Assessment is undertaken in the case where a listed activity is triggered. Such activities include:

- (a) *the construction of a road, wall, powerline, pipeline, canal or other similar forms of linear development or barrier exceeding 300m in length.*
- (b) *the construction of a bridge or similar structure exceeding 50 m in length; and*
- (c) *any development or other activity which will change the character of an area of land, or water -*
 - (i) *exceeding 5 000 m² in extent.*
 - (ii) *involving three or more existing erven or subdivisions thereof; or*
 - (iii) *involving three or more erven or divisions thereof which have been consolidated within the past five years; or*
 - (iv) *the costs of which will exceed a sum set in terms of regulations by SAHRA or a Provincial Heritage Resources Authority.*
- (d) *the re-zoning 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.*

Section 3 of the National Heritage Resources Act (25 of 1999) lists a wide range of national resources protected under the act as they are deemed to be a national estate. When conducting Heritage Impact Assessment (HIA) the following heritage resources have to be identified:

- (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 paleontological 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 by 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) moveable objects, including -*
 - (i) objects recovered from the soil or waters of South Africa, including archaeological and paleontological 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 of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996).*

Other sections of the Act with direct relevance to the AIA are the following:

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.*

Section 35(4) *No person may, without a permit issued by the responsible heritage resources*



authority:

- *destroy, damage, excavate, alter, deface, or otherwise disturb any archaeological or paleontological site or any meteorite*

Section 36 (3) *No person may, without a permit issued by SAHRA or a provincial heritage resources authority:*

- *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 formal cemetery administered by a local authority; or*
- *bring onto or use at a burial ground or grave any excavation equipment, or any equipment which assists in detection or recovery of metals.*

7. DEGREE OF SIGNIFICANCE

The Heritage Impact Assessment (HIA) report was compiled Abantu Environmental Services in the proposed Wild coast Special Economic Zone located at the King Sabata Dalindyebo Local Municipality of O.R Tambo District Municipality in the Eastern Cape province of South Africa. Relevant maps, tables and figures are included, as stipulated in the NHRA (no 25 of 1999) and the National Environmental Management Act (NEMA) (no 107 of 1998). The HIA process consisted of three steps:

- **Literature Review:** The background information to the field survey relies greatly on the heritage background research. This is obtained through SAHRIS website, journals, books etc.
- **Physical Survey:** Field survey was conducted from the 29th of September to the 2nd of October 2022 on foot by an archaeologist from Abantu Environmental Services accompanied by the Abantu intern as well as the airport personnel in the area of development. The survey was aimed at locating and documenting sites falling within and adjacent to the proposed development footprint.
- The final step involved the **recording and documentation** of relevant archaeological resources, the assessment of resources in terms of the HIA criteria and report writing, as well as mapping and constructive recommendations.

The significance of identified heritage sites was based on four main criteria:



- Site integrity (i.e., primary vs. secondary context),
- Amount of deposit, range of features (e.g., stonewalling, stone tools, and enclosures),
- Density of scatter (dispersed scatter)
 - ✓ Low - <10/50m²
 - ✓ Medium - 10-50/50m²
 - ✓ High - >50/50m²
- Uniqueness; and
- Potential to answer present research questions.

Management actions and recommended mitigation, which will result in a reduction in the impact on the sites, will be expressed as follows:

A - No further action necessary.

B - Mapping of the site and controlled sampling required.

C - No-go or relocate development activity position.

D - Preserve site, or extensive data collection and mapping of the site; and

E - Preserve site.

Impacts on these sites by the development will be evaluated as follows:

Site Significance

Site significance classification standards prescribed by the SAHRA (2006) and approved by the ASAPA for the Southern African Development Community (SADC) region, were used for the purpose of this report.

Table 3: Site significance classification standards as prescribed by SAHRA.

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1		Conservation; National Site Nomination
Provincial Significance	Grade 2		Conservation; Provincial Site



FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
(PS)			Nomination
Local Significance (LS)	Grade 3A	High Significance	Conservation: Mitigation not advised
Local Significance (LS)	Grade 3B	High Significance	Mitigation (Part of site should be retained)
Generally Protected A (GP.A)	Grade 4A	High / Medium Significance	Mitigation before destruction
Generally Protected B (GP.B)	Grade 4B	Medium Significance	Recording before destruction
Generally Protected C (GP. A)	Grade 4C	Low Significance	Destruction

Standard impact assessment methodologies have been used to ensure consistency and to evaluate a wide variety of impacts. In line with the methodology for assessing impacts, the following criteria are considered:

- Significance.
- Spatial scale.
- Temporal scale.
- Probability; and
- Degree of certainty

The impacts of each of the above assessment criteria were described using a combination of quantitative and qualitative methods. Below is a synopsis of and quantitative rating scale for each of the qualitative descriptors:



Table 4: Impact Assessment Criteria

CRITERIA	CATEGORIES	EXPLANATION
Overall nature	Negative	Negative impact on affected biophysical or human environment.
	Positive	Benefit to the affected biophysical or human environment.
Spatial Extent over which impact may be experienced	Site	Immediate area of activity incorporating the 20m zone which extends from the edge of the afforestation area.
	Local	Area up to and/or within 10km of the 'Site' as defined above.
	Regional	Entire community, drainage basin, landscape etc.
	National	South Africa
Duration of impact	Short-term	Impact would last for the duration of the activity – e.g., activities: Land clearing. Quickly reversible.
	Medium-term	Impact would dissipate after the Project activity. E.g., activity: harvesting. Reversible over time.
	Long-term	Impact would persist. E.g., operational period the growth periods between each 'short term' activity.
	Permanent	It would continue to have an impact after the proposed development is complete. The process of harvesting and removing the trees.
Probability of occurrence	Unlikely	<40% probability.
	Possible	40% - 70% probability.
	Probable	>70% probability.
	Definite	>90% probability.
Mitigation Potential [i.e., the ability to manage or mitigate an impact given the necessary resources and feasibility of application]	High	Easy and cheap to manage. It is not generally necessary to have specialized equipment or expertise. By implementing management plans or undergoing good housekeeping, the potential impacts can be mitigated. It is necessary to monitor any negative effects regularly in order to maintain appropriate levels. The likelihood of an adverse impact remains low or negligible after mitigation.
	Moderate	To maintain acceptable levels of impacts, higher levels of expertise and resources are needed. Project design can incorporate mitigation measures. After mitigation, impacts will likely be moderate to low. Possibly impossible to mitigate the effects completely, with a residual impact.
	Low	Will not be possible to mitigate this impact entirely regardless of teexpertise and resources applied. The potential to manage the impact may be beyond the scope of the Project.
		Management of this impact is not likely to result in a measurable change in the level of significance.
Significance of Impact (preliminary only)	Slight	Largely of HIGH mitigation potential.
	Moderate	Largely of MODERATE mitigation potential.
	Substantial	Largely of LOW mitigation potential.



Table 5: Possibility of archaeological materials on site

Landscape type	Description	Occurrence still possible	Likely occurrence
Archaeology	Early, Middle and Late Stone Age; Iron Age;	None	Likely
Burial and Graves	Pre-colonial burials. Graves of victims of conflict; Graves older than 100 years; Graves older than 60 years; Graves younger than 60 years;	Yes	Likely
Built Environment	Formal public spaces; Historical structures. Area associated with social identity/displacement;	None	Unlikely
Historic Farmland	Historical farm yards. Historical farm workers villages; Irrigation furrows. Historical routes. Distinctive types of planting;	None	Likely
Landscape usage	Sites associated with living heritage e.g., initiation school sites. Sites of political conflict. Sites associated with a historic event/person;	None	Likely
Historic Town	Historic mission settlements;	None	Likely

8. CONSULTATION

There are two types of consultations that normally take place on site during a development: informal and formal consultation. As part of an informal site survey, key stakeholders, such as farm managers and employees, bystanders on the road, and sometimes older community citizens, can be interviewed. A consultation of this kind can lead to the identification of burial grounds and graves. Graveyards without visible markers or informal graveyards may fall into this category. In addition, informal consultation, several sacred places that may otherwise go unnoticed.



Formal consultation includes advertisement and project announcement through newspaper ads, site notices, emails, and phone calls. This usually happens at an arranged venue where the community, interested parties, and affected parties are informed of the project and can give their input. Abantu Environmental Services undertook the consultation process with the traditional leadership and the community on the 27th of January 2023 which was then followed by the site notices and newspaper advert (Appendix A).

9. SOCIO-CULTURAL AND HISTORICAL BACKGROUND

This section provides insights into the archaeology and cultural heritage of the receiving environment. Where necessary, reference to archaeology and other heritage resources found within the broader region of Eastern Cape will be added.

Archaeology in Southern Africa is divided into the Stone Age, Iron Age, and the Historical Period. During these periods, diverse groups of people settled on the Southern African landscape. Majority of the research on the culture, archaeology, rock art in Southern Africa has been conducted by Huffman (2002; 2007); Mason (1968; 1982; 1986); Sutton (2012), Kuman & Field (2009) Kuman et al. (1997).

OR Tambo district municipality occupies the entire coastline and contains major historical and cultural archaeological and historical events which are important to the heritage of the nation. Among the heritage sites in the district are fish traps, shell middens and caves from the Stone and Iron Ages. A large part of Eastern Cape province has previously been studied and found to be potentially a source of Stone Age period sites. These are evident in this district as well. The heritage data for OR Tambo District Municipality has been thoroughly investigated through the review of existing heritage resource databases (SAHRIS), literature, and expert knowledge.

Archaeological Sites

The remnants of Stone Age hunter-gatherer's activities are customarily divided into the Early, Middle and Late Stone Age. According to Klein (2000) and Mitchell (2002), the ESA is comprised of the Oldowan stone tool complex (2 and 1.7-1.5 million years ago), and the Acheulean stone tool complex (1.7-1.5 million years ago and 250-200 thousand years ago). And is characterized by small flakes, flaked cobbles, and percussive tools (Klein 2000; Mitchell 2002; Diez-Martin et al., 2015; De La Torre 2016). Stone Age sites are usually associated with stone artefacts found scattered on the surface or



as part of deposits in caves and rock shelters.

Across the Eastern Cape, human habitation dates back as far as the earlier Stone Age. Early humans lived in the area for thousands of years from the Early Stone Age, through what is known as the Middle Stone Age and well into the Late Stone Age (Klein 1983). According to Klein (2000) and Mitchell (2002), the ESA is comprised of the Oldowan stone tool complex (2 and 1.7-1.5 million years ago), and the Acheulean stone tool complex (1.7-1.5 million years ago and 250-200 thousand years ago). And is characterized by small flakes, flaked cobbles and percussive tools (Diez-Martín et al., 2015; De La Torre 2016).

Approximately 20 sites in the Transkei, now known as Mthatha (in the King Sabata Dalindyebo Local M municipality), have been reported to contain ESA material (Derricourt 1977: Feely 1987). There are few other archaeological remains on the ESA sites in the Transkei, aside from stone artefacts. This has made it difficult to infer the economic dynamics of the ESA people in the region (Mazel 1989).

Several types of small, highly effective tools were made during the late Stone Age, including arrowheads and knives. Later Stone Age (LSA) sites are found along the coast as well as inland as cave deposits, rock shelters, and open sites. Nearly all the LSA archaeological sites in the Eastern Cape region date from the past 10 000 years, when San hunters and gatherers inhabited the landscape, living in rock shelters, caves, and on the open landscape.

Around the third century AD, a new Bantu speaking population group arrived in southern Africa, marking the beginning of the Iron Age (Farmer Period). As they settled in areas that hunter-gatherers had occupied in the Later Stone Age and Khoekhoe herders, they introduced a new way of life. The Iron Age was characterized by settled village life, food production (agriculture and animal husbandry) and metallurgy (the mining, smelting, and working of metals such as iron, copper, and gold). Many Iron Age communities inhabited the eastern half of southern Africa due to the summer-rainfall climate that was conducive to growing millet and sorghum. A relatively small portion of the Iron Age (IA) research has focused on the Eastern Cape.

Among the most important Early Iron Age (EIA) sites of the Eastern Cape are Kulubele located in the Kei River Valley, near Khomga (Binneman 1996), Ntsitsana situated in the interior of Transkei, on the banks of Mzimvubu River, 70km west of the coast (Prins & Granger 1993), and Canasta Place located in the



Buffalo River Valley (Nogwaza 1994).

Several EIA studies have previously been conducted in the Transkei and Ciskei, including the one conducted at Buffalo River Mouth (Wells 1934; Laidler 1935), at Chalumna River Mouth (Derricourt 1977), as well as further research by Feely (1987) and Prins (1989). The only prominent EIA site in the district is the one found at Mzimvubu River in the Port St Johns local municipality. Even though several studies have been conducted at Transkie, now known as Mthatha in the King Sabata Dalindyebo Local Municipality, nothing worth noting was recorded. **The proposed site development did not record any materials belonging to either Stone Age or Iron Age**

Military History

Historiographically, the Eastern Cape region is considered a frontier zone based on the several wars for power that took place in the province. The province was the meeting place of an aggressively expanding colonial frontier and the southernmost concentration of Bantu-speaking farming communities in Africa (Huffman 2007). It is well known in historical literature for having seen nine frontier wars between the Cape colonists and the Xhosa people in its history from 1779 to 1879. In contrast to white colonial settlement, which expanded east and north from Table Bay, in modern Cape Town, Bantu-speaking agropastoralists, the ancestors of the Xhosa nation, inhabited areas to the east of the Sundays River some 1300 years ago (Binneman et al., 1992).

It is believed that the Mthatha town of King Sabata Dalindyebo originated from colonial villages dating from the mid-1800s. Consequently, successive Afrikaans and British colonial administrators effectively implemented a new era of colonial occupation through the last half of the 1800s and into the late 1900s. Around the 1850s, more settler communities began to arrive in the region, which led to a clash between African chiefdoms and the incoming settlers. Several of these colonial wars and battles continued into the Anglo-Boer wars of 1899-1902.

Buildings and Structures

The National Heritage Resource Act prohibits destroying or altering any structure older than 60 years old without following the proper procedures. The district is likely to have older buildings and structures, considering many areas have been inhabited since the early 1800s. Due to the long history of war in this area, there are a lot of buildings and structures, such as churches, schools, hospitals, and the typical homes of both indigenous and white settlers which are not yet recorded in the SAHRIS website. However,



not every building is associated with negative events; some have peaceful tales to tell. Other buildings were used as meeting places for strategizing against the oppressive government during the liberation struggle.

The SAHRIS database, however, has recorded and documented over 25 structures, 16 buildings and three bridges in the O.R. Tambo district. Most of these are found in Mthatha, King Sabata Dalindyebo Local Municipality.

Monuments and memorials

Often monuments and memorials are erected as an honour of remembrance for the fallen heroes who fought in the wars. Taking into account the number of warfare that had taken place in the Eastern Cape as a whole, which are well documented in the history and archaeology books. Due to this reason, it should therefore be noted that the province as a whole will have a lot of monuments and memorials to commemorate those who lost their lives in the warfare. There are prominent monuments and memorials in the province such as the Mendi memorial which commemorates the lives of the South African Native Labour contingent who died on the troopship "SS Mendi" after sinking off the Isle of Wight, near St. Catherine's Point in 1917.

The Horse memorial which was erected in honour of the horses killed during the Anglo Boer War (1899-1902). This magnificent statue is one of only three memorials in the world dedicated to horses. Fort Frederick monument represent the first permanent military outpost in the Eastern Cape province that was established in 1799 and named after the Frederick, Duke of York. The stone building was erected in order to stop the French from conquering the Cape Colony during the Napoleonic wars and played a vital role in establishing British rule in South Africa in combination with the Battle of Blaauwberg.

The 1820 Settlers National Monument that was established to honor the contribution to South African society made by the first big influx of British settlers. Originally erected in 1974, It is a living monument commemorating the English language as much as the original Settlers (Navilile 1992). The Provost Prison was built in 1838 as a military prison in the Drostdy grounds as instructed by Sir Benjamin d'Urban, Governor of the Cape Colony at the time. It was nominated as a National Monument in 1937.

Originally dedicated to those who died in World War I, Cenotaph memorial panels were added later to



commemorate those who died in World War II. The Cenotaph is defined as a memorial erected in honour of the people whose physical remains are elsewhere. It should be noted that the above mentioned monuments and memorials do not fall under O.R Tambo district.

The OR Tambo Memorial Site, for example, is located at OR Tambo's father's homestead, in KwaMzimeli, at Nkantolo. This site is associated with oral, traditional, and living heritage as Nkantolo was O.R Tambo's natal home and a place where he grew up. Further located within the site are the graves of Mzimeli, his two wives, MaNjijela (first wife) and MaNzala (second wife), O.R Tambo's mother and Mzimeli's brother Sighetshe Mpu (Wahl and Schalkwyk, 2013). These are areas of cultural significance for those interested in the history of the icon and those invested in the liberation history of South Africa.

The OR Tambo District Municipality is also home to royal Mtirara, a homestead to the Regent King Jongintaba Dalindyebo and known to the abaThembu community as a grooming place for the future amaXhosa chiefs. This site is also known for grooming former South African President Mr Nelson Mandela.

The infamous Bullhoek Massacre, where police killed 163 Xhosa civilians from the Union of South Africa, was fought within the O.R Tambo District Municipality. The massacre occurred on 24 May 1921 in the village of Ntabelanga in the Cape Province (today's Eastern Cape). Unfortunately, some parts of the larger OR Tambo District Municipality has no recordings of some of these monuments and memorials on the SAHRIS. The only recorded monument in the SAHRIS database belonging to the O R Tambo district is the Ngquza Hill. This monument commemorates the eleven Pondo tribesmen who the apartheid policemen massacred at the Ngquza Hill in 1960.

Burial Grounds and Graves

As a result of prehistoric activity or as victims of conflict or crime, human remains and burials are commonly found near archaeological sites. They may also occur in abandoned and neglected burial sites. Often, it is difficult to detect the presence of archaeological human remains on the landscape as these burials, in most cases, are not marked at the surface. Archaeological and historical burials are usually found when they have been exposed by erosion and earth moving activities during infrastructure projects, such as power lines and roads. The presence of packed stones or stones may indicate that informal burials occurred before colonization.



Majority of the archaeological artefacts in the district are in the form of graves and burial sites. It is assumed that this is the case mainly because of the homestead burial tradition amongst the Xhosa people. Also, because the entire province was a war zone, most people lost their lives during that period. Graves and burial sites are allocated Grade IIIa as their grading status. The entire Eastern Cape province was a war zone during various periods of occupation by different clans and cultural groups. These skirmishes, as well as the recent historic European wars, where most people lost their lives during that period. According to the NHRA Regulations, the graves, burial grounds and sites are allocated a Grade IIIa, heritage grading status due to their sensitivity and significance.

As such, no graves, burial grounds, or human remains may be damaged, altered, exhumed, or removed from their original position without the relevant permits, authorisations and permission of the heritage authority concerned, i.e. Eastern Cape Provincial Heritage Resources Agency (ECPHRA). Human remains are also allotted a HIGH heritage significance rating at all Grading levels for their spiritual, social, and cultural values. They may not be altered in any way without the permission of the Provincial Heritage Resource Authority and the next-of-kin and/or direct descendants.

Due to the density of rural settlements and farmsteads in the OR Tambo district, there are likely many traditional burial sites and ancestral burial sites outside formal municipal cemeteries. Customarily, these burial places are found within homesteads and are managed by the next-of-kin and/or direct descendants. Nevertheless, social processes such as forced removals resulted in many people abandoning their homesteads or inadvertently being alienated from their traditional burial sites.

As a result, it should be recognised that informal, traditional burials are likely to be found in the larger area. It should be recognised that informal, traditional burials are likely to be found in this area dating back to the Iron Age periods of site occupation in the larger area. The likelihood of the disturbance of sub-surface grave goods and/or the identification of individual burials or graves remains HIGH due to the sub-terrain nature of burial practices of the indigenous isiXhosa speaking population groups that dominate the Eastern Cape province of South Africa. **The proposed area of development had a total of 11 graves that would likely be impacted by the development.**

Early History

The settlement area existed in the 1870s as a buffer zone in response to reported tensions between



Pondo and neighboring Thembu groups, and a magistrates' court opened in 1875. The first magistrate to be appointed that year was a man named JF Boyes. The settlement developed over the next few years and in 1882 became a military post for British colonial troops. The city itself was founded in 1883 on the banks of the Mthatha River. Almost a century later, the Mthatha Dam was built about five miles upstream from the city. Mthatha became the region's leading administrative center, with both Anglican and Catholic cathedrals.

Evidence for sociopolitical organization in the study area and the Transkei from the middle of the eighteenth to the beginning of the nineteenth century indicates that the inhabitants lived in a variety of small-scale political units with various populations, sizes, and political structures (Feely 1987; Wright & Hamilton, 1989). Rage and instability predominated throughout this time period as political conflicts broke out as a result of chiefdoms' competing for control of resources and authority. The second half of the eighteenth century saw the rise of stronger chiefdoms and aramouncies. Yet, due to the absence of an established official central governmental entity, these states were not completely developed. This altered in the 1780s when portions of northern KwaZulu-Natal underwent a move toward a more centralized governmental entity.

However, the Zulu kingdom founded by King Shaka rose to prominence in KwaZulu-Natal in the early 19th century and had a significant impact on the nearby Nguni chiefdoms in the project area (Feely 1987). The Bhaca and Qwabe tribes, refugees from tribes living north of the Umtavuna River, migrated into the Transkei and requested permission from the Mpondo chief to settle in nearby areas.

Refugees at Qumbu requested the Mpondomise chief's approval to settle in specific areas of the region. Known collectively as amaMfengu, many of these refugees established themselves in the project area and its surrounding areas to the north of Mthatha. The amaNgwane, a party of northern refugees, crossed the Mthatha River and engaged British colonial forces and their Thembu and Xhosa allies in a bloody fight at Mbholompo Point in 1828. The amaNgwane was vanquished during this incident, and the tribe was dispersed (Peires 1981).

Black homeland leaders decided to federate their different states following independence during a summit meeting held in 1973 at Umtata. As a bantustan—a nominally independent state not recognized outside of South Africa, Transkei won independence in 1976. Mthatha served as the capital under the name "Umtata" Under the Transkei regime, an airport named after the then ruler of Transkei KD Matanzima



was built, which was later renamed to Mthatha Airport.

10. RECOMMENDATIONS AND CONCLUSIONS

The proposed development area was surveyed on foot by an archaeologist from Abantu Environmental Services to identify and record all archaeological materials found on site. The survey was only limited to the proposed Wildcoast Special Economic Zone located on the Northern Section under the King Sabata Dalindyebo local municipality situated under O.R Tambo district municipality in the Eastern Cape province.

The physical survey of the site as well as the consultation with Coega personel resulted in the discovery of six fenced informal graveyards that contains a total of seven possible graves marked by stone representing stoneheads. The remaining informal graveyards (5 and 6) have no stone marking resulting in the uncertanities of the number of graves, consultation however suggested that they could be four graves which makes a total of 11graves.

Based on the proposed development plans, the graves will be negatively impacted during the construction phase. All options to protected the graves at their original location and not withholding the proposed development were taken into consideration. Unfortunately, the construction phase will damage the graves, visitation to the graves by the families will be minimal due to the security measures of the Airport and fencing them all off will not surface as they are scattered around the proposed development area. Abantu Environmental Services recommends that after taking into consideration the importance of human remains, not stading in front of development while protecting the remains that the identified and recorded human remains should be relocated to a safer place. It should be noted that based on the history of the area and the forced removals that took place in the 1970's, there are higher chances of discovering more graves and heritage materials during the construction phase. In the case that such are discovered, the developer should barricade the area with 30m buffer zone, contact /PHRA of Eastern Cape/SAHRA as well as the heritage specialist to advice further. It is recommended that the PHRA of Easter Cape allow the proposed development to proceed adhering to the recommendations above.



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12. APPENDIX A: PROOF OF PUBLIC PARTICIPATION

1. Meeting minutes between the traditional leadership and Abantu Environmental Services
HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED NORTHERN AREA OF THE WILD COAST
SEZ, MTHATHA AIRPORT, IN THE KING SABATA DALINDYEBE LOCAL MUNICIPALITY, O. R.
TAMBO DISTRICT MUNICIPALITY, EASTERN CAPE PROVINCE

MEETING MINUTES

DATE : 27 January 2023

TIME : 09h00

VENUE: Ncise, Mthatha - Traditional Leaders' place

Coordinates: Lat: 31°30'11.79"S

Long: 28°40'8.21"E

ITEMS	MINUTES
1. Opening and welcome	Opening. The Traditional Leader welcome the attendees and introductions were made. Mr Pango introduced Abantu Environmental Services
2. Meeting Attendees	Traditional Leadership Mr S. Thokozani Makaula – Traditional Leader Ms N. Makaula – Secretary Ms Nobuhle Gxagxisa - Ward committee member Coega Development Cooperation Mr Daniel Pango – Social Development Facilitator



ITEMS	MINUTES
	<p>Abantu Environmental Services</p> <p>Mr Sive Mlamla (Pr.Sci.Nat, Reg. EAP (EAPASA)) – Lead Environmental Scientist</p> <p>Mr Thembani Phakade – Stakeholder Engagement Manager</p>
<p>3. Discussion</p>	<p>Mr Thembani Phakade:</p> <p>Gave background into the project and explained to the purpose of the meeting.</p> <p>Solicit comments and advice from the traditional leadership and community tackling the matter of the identified graves within the airport and to inform a potential relocation process or any other recommendation which may arise from the Heritage Impact Assessment Process (HIA).</p> <p>Asked whether the families of the graves are known to enable capturing their details and feelings on the proposed development impacts on the graves.</p> <p>Mr Phakade explained that prior to taking any of the possible recommendations from the HIA, locals' inputs are required to inform the conclusion of the process of the Heritage Impact Assessment.</p> <p>Ms Makula:</p> <p>Pointed out that there was a ceremony for the spiritual relocation of the graves which was held in consensus with the traditional leadership, the community, certain government departments and affected families. The matter of all the graves in the airport has been a long-known issue that was eventually resolved through the initiative above.</p>



ITEMS	MINUTES
	<p>Prior to the ceremony, word of mouth estimated 200 graves which were proven to be untrue because some of the allegedly affect families were looking at land claim benefit pay-outs from the government, which at the time were around R15K per grave.</p> <p>Exact estimate turned to be 67 graves which were located within the airport and the ceremony was done.</p> <p>Explained that families agreed that the graves would be relocated spiritually, coffins were available, and re-buried to a designated grave site. A cow was slaughtered by the chief for <i>ukubahlamba</i>.</p> <p>Families kept on coming to the chief for visiting graves. The instruction was that visits need to be made to the actual cemetery were the graves were agreed to be re-buried at. That's the status quo.</p> <p>Advised that the airport should possible have the names and records of the deceased and affected families. There is a designated grave site for all those who were relocated.</p> <p>Mr Makaula:</p> <p>Further explained that most graves are under the run-away. He further pointed out that there used to be traditional herbs within the airport but they have ceased collecting owing to comply with airport safety regulations.</p> <p>The chief also shared there were once motions that as opposed to relocation of the graves there should be one memorial stone with all the names, however the suggestion was disputed. The chief noted that invoking the process is not advisable as the matter was holistically addressed in consultative and inclusive process.</p>



ITEMS	MINUTES
	<p>Mr Thembani Phakade and Mr Sive Mlamla: Thanked the Traditional Leadership and community for the valuable background on the issue of the graves but however advised that the spiritual relocation is not supported by Section 36 of NHRA 25 of 1999 and the Tissue Act thereof. They further advised the stakeholders that the previous process went about the wrong way in terms of paying the deceased families. And for the protection of the remaining graves and for COEGA to comply with the Heritage Legislation, the actual physical relocations of the graves should be undertaken.</p> <p>Mr Makaula:</p> <p>Indicated that the distinguished Professor Somadoda Fikeni was the leader of the ceremony and must be approached to source record or guide on where these can be found.</p>
4. Conclusion	<p>Chief revisited and re-iterated that land claims where paid and the processes where followed. Therefore, the matter was concluded in harmony. He however understood the explanation given by Abantu personnel and stated that the matter should be revisited with the affected families and his team before the process could be undertaken again.</p>



2. Meeting Attendance Register

**HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED NORTHERN AREA OF THE WILD COAST SEZ,
MTHATHA AIRPORT, IN THE KING SABATA DALINDYEBO LOCAL MUNICIPALITY, O. R. TAMBO
DISTRICT MUNICIPALITY, EASTERN CAPE PROVINCE ATTENDANCE REGISTER**

NCISE A/A NO. 1
MTHATHA
5099

NCISE COMMITTEE MEETING
DATE: 27-01-23
TIME:
VENUE:

NAME & SURNAME	DESIGNATION	CONTACTS	SIGNATURE
Sive Mlamla	Environmental Specialist	078 207 8278	
DANIEL PANGO	COESA	082 99 87546	
Thembani Phakane	Environmentalist	076 924 1383	
Nobuhle Sinqoqiso	W/committee	083 816 9182	
M. MAKAULA	SECRETARY	078 358 9576	
STHOKOZANI MAKAULA	T/L	073 711 7372	

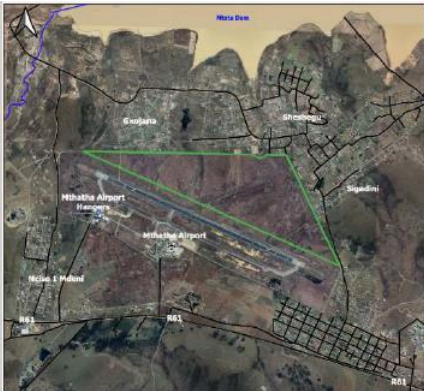


3. Site Notices

NOTICE OF PHASE 1 HERITAGE IMPACT ASSESSMENT (HIA) APPLICATION


Notice is hereby given that an application for a Phase 1 Heritage Impact Assessment (HIA) in terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999) will be lodged with the Provincial Heritage Resources Authority of Eastern Cape (Eastern Cape Provincial Heritage Resource Authority) by Abantu Environmental Services (Pty) Ltd on behalf of Coega Development Corporation (CDC).

PROJECT NAME: Heritage Impact Assessment for the proposed Northern area of the Wild Coast SEZ, located directly adjacent to the Mthatha Airport, in the King Sabata Dalindyebo Local Municipality, O. R. Tambo District Municipality, Eastern Cape Province.




Locality Map of the Northern Area of the Wild Coast SEZ





Consultant:



Client:



Legend

-  Mthatha Airport
-  WCSEZ (North Area)
-  EC Roads
-  NFEPA Rivers

0 500 1,000 m

All Interested and Affected Parties (I&APs) are invited to lodge written comments during the 30-day comment period (16 February 2023 - 17 March 2023).

ANY COMMENTS/ENQUIRIES SHOULD BE ADDRESSED TO:

Mr. Sive Mlamla (Pr.Sci.Nat, Reg. EAP (EAPASA))
 533 Masincedane Location
 Keiskammahoek
 5670
 Cell: 078 207 8278
 Email: info@abantuenvironmental.co.za



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SERVICES**



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Fax : 086 685 9536





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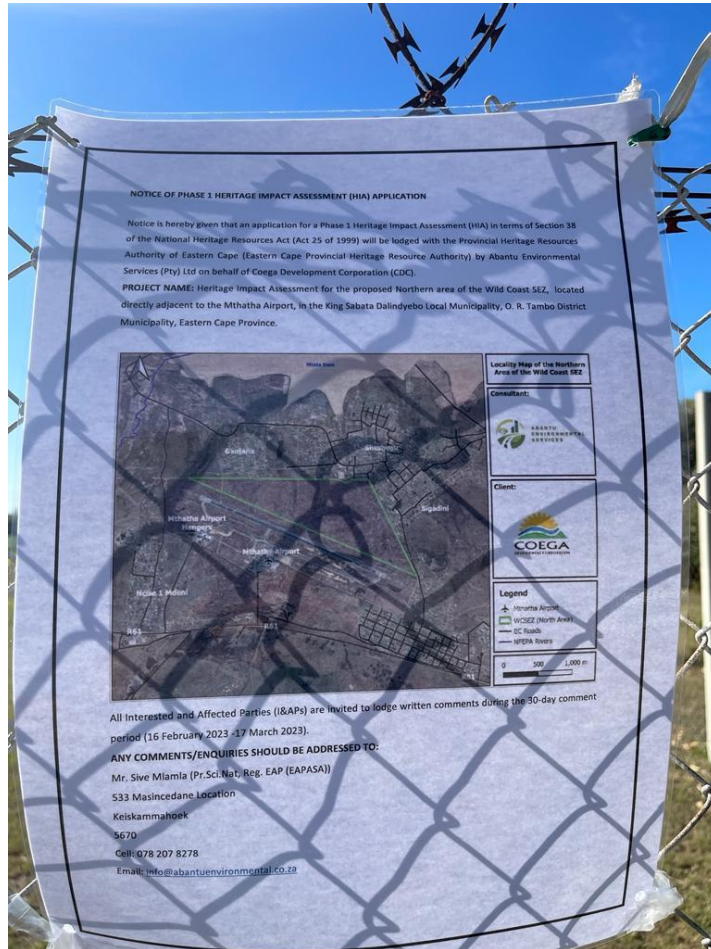


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4. Newspaper Advert

Thursday February 16 2023 CLASSIFIEDS 'SOLEZWE LISIXHOSA

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DR GWENEMBE
072 550 224

DR JONGWE
072 550 224

BABA DUMA
072 550 224

MKHULU MASONDO
072 550 224

BABA LISAKA
0720549789 / 0788774034

MKHULU MASONDO
063 051 3722

MKHULU MASONDO
063 051 3722

KING MINSI
063 422 2217

NOTICE OF PHASE 1 HERITAGE IMPACT ASSESSMENT (HIA) APPLICATION

Notice is hereby given that an application for a Phase 1 Heritage Impact Assessment (HIA) in terms of Section 21 of the National Heritage Resources Act (Act 25 of 1999) will be lodged with the Provincial Heritage Resources Authority of Eastern Cape (Eastern Cape Provincial Heritage Resource Authority) by Assanti Environmental Services (Pty) Ltd on behalf of Coega Development Corporation (CDC).

PROJECT NAME: Heritage Impact Assessment for the proposed Northern area of the Vred Coast SEZ, located directly adjacent to the Mthatha Airport, in the King Sabata Dalindyebo Local Municipality, O. R. Tambo District Municipality, Eastern Cape Province. All Interested and Affected Parties (I&APs) are invited to lodge written comments during the 30-day comment period (16 February 2023 - 17 March 2023).

ANY COMMENTS/ENQUIRIES SHOULD BE ADDRESSED TO:
Mr. Sive Mntshali (Project Manager, EAP) (EAPASA)
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