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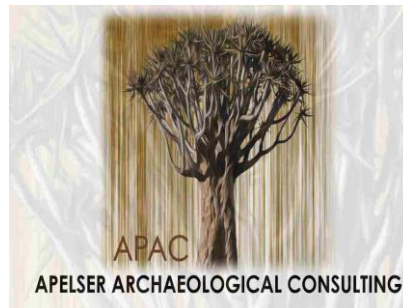
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**2022-11-05**

To: Whom it May Concern  
**South African Heritage Resource Agency**  
**P O Box 4637**  
**Cape Town**  
**8000**

**RE: Motivation for Exemption from a full Phase I Heritage Impact Assessment – Proposed Excelsior Abattoir Expansion on Erven 4051 & 4052 in Kuruman, Northern Cape Province**

APelser Archaeological Consulting cc (APAC cc) was appointed by EarthnSky Environmental to provide a motivation for Exemption from a Full Phase 1 HIA for the proposed expansion of the existing Excelsior Abattoir in the Northern Cape town of Kuruman.

### ***Background to the Project***

The proposed expansion of the existing Excelsior Abattoir aims to increase the cattle (red meat) slaughtering capacity of the abattoir from 50 to 200 heads of cattle per day. The expansion will include internal changes to the abattoir as well as the expansion of the abattoir building to accommodate an additional cold storage room with three product loading bays. The main abattoir building will be extended to the north-west and the offices will be extended to the north east.

According to the developer (Excelsior Abattoir) the site is underlain by rocks that cannot be excavated into (the natural bed-rock or "klip bank"). Building is therefore done on top of the rocks/surface and no foundations are dug for the proposed expansion work.

*"In terms of the National Heritage Resources Act, no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that prior to development it is incumbent on the developer to ensure that a Heritage Impact Assessment is done. This must include the archaeological component (Phase 1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required.*

*The quickest process to follow for the archaeological component is to contract an accredited specialist (see the web site of the Association of Southern African Professional Archaeologists [www.asapa.org.za](http://www.asapa.org.za))*

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to provide a Phase 1 Archaeological Impact Assessment Report. This must be done before any large development takes place. The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38) about the process to be followed. For example, there may need to be a mitigation phase (Phase 2) where the specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of the sites.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary. Please note that a nationwide fossil sensitivity map is available on SAHRIS to assist applicants with determining the fossil sensitivity of a study area.

**If the property is very small or disturbed and there is no significant site the heritage specialist may choose to send a letter to the heritage authority motivating for exemption from having to undertake further heritage assessments. Any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed."**

Last mentioned option was decided on for this project which entailed desktop research as part of the assessment. No fieldwork was undertaken and the photographic images of the site and existing structures here that are included in the document were provided to the Heritage Specialist by the Environmental Assessment Practitioner.

### **Relevant Legislation**

Aspects concerning the conservation of cultural resources are dealt with mainly in two Acts. These are the National Heritage Resources Act (Act 25 of 1999) and the National Environmental Management Act (Act 107 of 1998).

### **The National Heritage Resources Act**

According to the Act the following is protected as cultural heritage resources:

- a. Archaeological artefacts, structures and sites older than 100 years;
- b. Ethnographic art objects (e.g. prehistoric rock art) and ethnography;
- c. Objects of decorative and visual arts;
- d. Military objects, structures and sites older than 75 years;
- e. Historical objects, structures and sites older than 60 years;
- f. Proclaimed heritage sites;
- g. Grave yards and graves older than 60 years;
- h. Meteorites and fossils; and
- i. Objects, structures and sites of scientific or technological value.

### **The National Estate includes the following:**

- 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 features of cultural significance;
- e. Geological sites of scientific or cultural importance;
- f. Sites of Archaeological and palaeontological importance;
- g. Graves and burial grounds;
- h. Sites of significance relating to the history of slavery; and

- i. Movable objects (e.g. archaeological, palaeontological, meteorites, geological specimens, military, ethnographic, books etc.).

A Heritage Impact Assessment (HIA) is the process to be followed in order to determine whether any heritage resources are located within the area to be developed as well as the possible impact of the proposed development thereon. An Archaeological Impact Assessment (AIA) only looks at archaeological resources. According to Section 38 (1) of the Act an HIA must be done under the following circumstances:

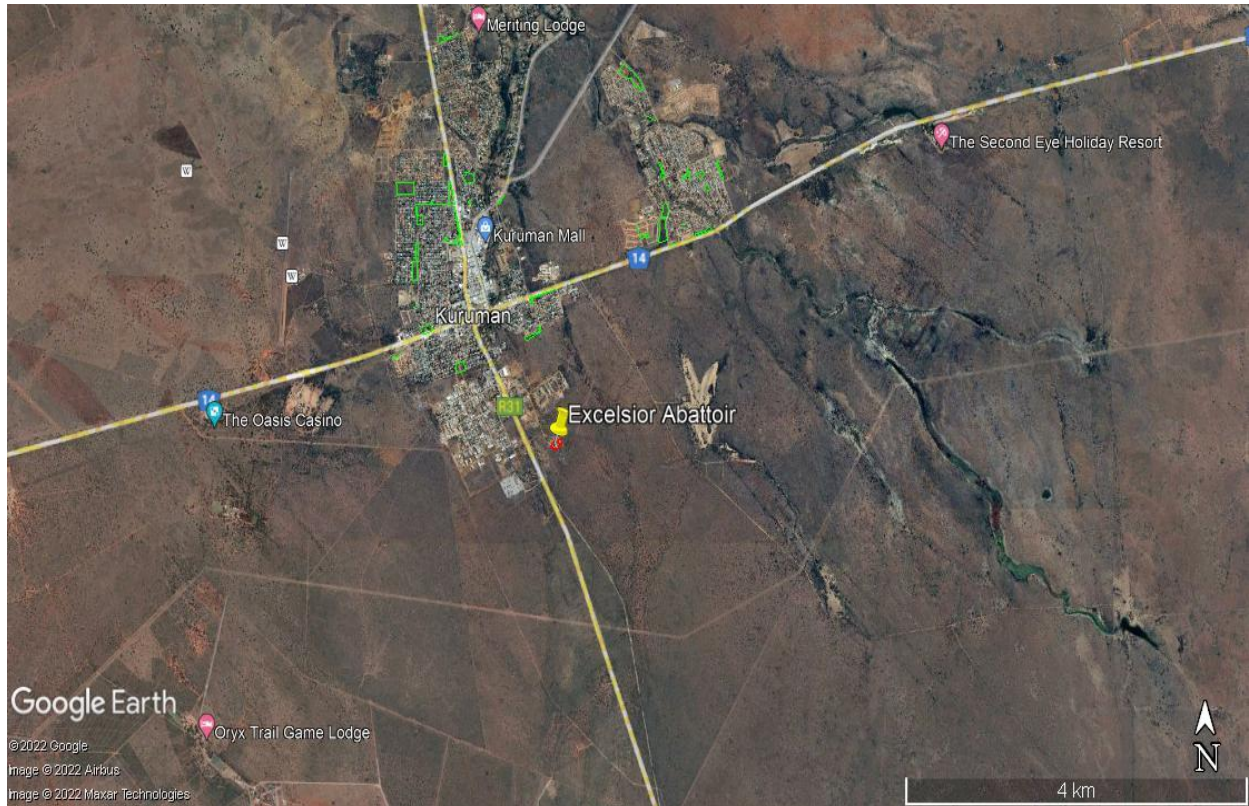
- a. The construction of a linear development (road, wall, power line, canal etc.) exceeding 300m in length.
- b. The construction of a bridge or similar structure exceeding 50m in length.
- c. Any development or other activity that will change the character of a site and exceed 5 000m<sup>2</sup> or involve three or more existing erven or subdivisions thereof.
- d. Re-zoning of a site exceeding 10 000m<sup>2</sup>.
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority.

***Results of Desktop Heritage Assessment: Motivation for Exemption from a full Phase I Heritage Impact Assessment for the proposed Expansion of the existing Excelsior Abattoir***

The study and proposed development area is located on Erven 4051 & 4052, in the town of Kuruman in the Northern Cape Province.

The study & proposed development area is located in an area surrounded by both urban residential settlement and industrial developments, and is situated just to the south of the centre of Kuruman and the N14 and east of the R31 road.

The specific area itself would have been heavily disturbed in the recent past, mainly through agricultural activities (livestock) and the development of the existing Excelsior Abattoir. The original natural and historical landscape in the Abattoir area has been completely altered through these activities, and as a result if any cultural heritage (archaeological and/or historical) sites or features existed here in the past it would have been fairly extensively disturbed or even destroyed. The topography of the study area is also flat and open, with no rocky outcrops, ridges or hills present.



**Figure 1: General location of the study & proposed development area (Google Earth 2022).**



**Figure 2: Closer view of the study & proposed development area (expansion of the existing Excelsior Abattoir). The area has been heavily impacted by the existing Abattoir development and related activities (Google Earth 2022).**

The Stone Age is the period in human history when lithic (stone) material was mainly used to produce tools. In South Africa the Stone Age can be divided in basically into three periods. It is however important to note that dates are relative and only provide a broad framework for interpretation. A basic sequence for the South African Stone Age (Lombard et.al 2012) is as follows:

Earlier Stone Age (ESA) up to 2 million – more than 200 000 years ago  
Middle Stone Age (MSA) less than 300 000 – 20 000 years ago  
Later Stone Age (LSA) 40 000 years ago – 2000 years ago

It should also be noted that these dates are not a neat fit because of variability and overlapping ages between sites (Lombard et.al 2012: 125).

According to David Morris of the McGregor Museum in Kimberley the archaeology of the Northern Cape is rich and varied, covering long spans of human history. The Karoo is particularly bountiful. Some areas are richer than others, and not all sites are equally significant. The significance of sites encountered in the study area may be assessed against previous research in the region and subcontinent. The region's remoteness from research institutions accounts for a relative lack of archaeological research in the area. The area has probably been relatively marginal to human settlement for most of its history, yet it is in fact exceptionally rich in terms of Stone Age sites and rock art, as a relatively few but important studies have shown (Morris 2006).

Stone Age sites are known to occur in the larger geographical area, including the well-known Wonderwerk Cave in the Kuruman Hills, Tsantsabane, an ancient specularite working on the eastern side of Postmasburg, Doornfontein, another specularite working north of Beeshoek and a cluster of important Stone Age sites near Kathu. Additional specularite workings with associated Ceramic Later Stone Age material and older Fauresmith sites (early Middle Stone Age) are known from Lylyfeld, Demaneng, Mashwening, King, Rust & Vrede, Paling, Gloucester and Mount Huxley to the north. Rock engraving sites are known from Beeshoek and Bruce (Morris 2005: 3).

Studies done by Kusel (2009) and by Pelsler & Van Vollenhoven (2011) at Black Rock and Gloria Mines near Hotazel, revealed a number of Early to Later Stone Age artefacts and sites in the larger area.

***No Stone Age sites or material are known to exist in the specific study area. It is envisaged that if any are to be found there it would be single out of context artefacts, or small scatters of material, on the surface of the area.***

The Iron Age is the name given to the period of human history when metal was mainly used to produce metal artefacts. In South Africa it can be divided in two separate phases (Bergh 1999: 96-98), namely:

Early Iron Age (EIA) 200 – 1000 A.D.  
Late Iron Age (LIA) 1000 – 1850 A.D.

Huffman (2007: xiii) however indicates that a Middle Iron Age should be included. His dates, which now seem to be widely accepted in archaeological circles, are:

Early Iron Age (EIA) 250 – 900 A.D.  
Middle Iron Age (MIA) 900 – 1300 A.D.  
Late Iron Age (LIA) 1300 – 1840 A.D.

The expansion of early farmers, who, among other things, cultivated crops, raised livestock, made ceramic containers (pots), mined ore and smelted metals, occurred in this area between AD 400 and AD 1100 and brought the Early Iron Age (EIA) to South Africa. They settled in semi-permanent villages (De Jong 2010: 35).

While there is some evidence that the EIA continued into the 15th century in the South African Lowveld, on the escarpment it had ended by AD1100. The Highveld became active again from the 15th century

onwards due to a gradually warmer and wetter climate. From here communities spread to other parts of the interior. This later phase, termed the Late Iron Age (LIA), was accompanied by extensive stonewalled settlements, such as the Thlaping capital Dithakong, 40 km north of Kuruman (De Jong 2010: 35-36).

Sotho-Tswana and Nguni societies, the descendants of the LIA mixed farming communities, found the region already sparsely inhabited by the Late Stone Age (LSA) Khoisan groups, the so-called 'first people'. Most of them were eventually assimilated by LIA communities and only a few managed to survive, such as the Korana and Griqua. This period of contact is sometimes known as the Ceramic Late Stone Age and is represented by the Blinkklipkop specularite mine near Postmasburg and finds at the Kathu Pan (De Jong 2010: 36).

Factors such as population expansion, increasing pressure on natural resources, the emergence of power blocs, attempts to control trade and penetration by Griquas, Korana and white communities from the south-west resulted in a period of instability in Southern Africa that began in the late 18th century and effectively ended with the settlement of white farmers in the interior. This period, known as the *difaqane* or *mfecane*, also affected the Northern Cape Province, although at a relatively late stage compared to the rest of Southern Africa. Here, the period of instability, beginning in the mid-1820s, was triggered by the incursion of displaced refugees associated with the Tlokwa, Fokeng, Hlakwa and Phuting tribal groups.

The *difaqane* coincided with the penetration of the interior of South Africa by white traders, hunters, explorers and missionaries. The first was PJ Truter's and William Somerville's journey of 1801, which reached Dithakong at Kuruman. They were followed by Cowan, Donovan, Burchell and Campbell and resulted in the establishment of a London Mission Society station near Kuruman in 1817 by James Read. Robert Moffat and his wife Mary came to Kuruman in 1820 and the mission has been known as The Moffat Mission Station ever since.

The Great Trek of the Boers from the Cape in 1836 brought large numbers of Voortrekkers up to the borders of large regions known as Bechuanaland and Griqualand West, thereby coming into conflict with many Tswana groups and also the missionaries of the London Mission Society. The conflict between Boer and Tswana communities escalated in the 1860s and 1870s when the Korana and Griqua communities became involved and later also the British government. The conflict mainly centered on land claims by various communities. For decades the western border of the Transvaal Boer republic was not fixed. Only through arbitration (the Keate Arbitration), triggered by the discovery of gold at Tati (1866) and diamonds at Hopetown (1867) was part of the western border finally determined in 1871. Ten years later, the Pretoria Convention fixed the entire western border, thereby finally excluding Bechuanaland and Griqualand West from Boer domination (De Jong 2010: 36).

Kuruman's name is thought to be derived from the name of an 18th century San leader Kudumane (Kalahari Tourism Information Booklet p.32).

### **Information from Wikipedia**

Kuruman is a town with just over 13,000 inhabitants in the Northern Cape province of South Africa. It is known for its scenic beauty and the Eye of Kuruman, a geological feature that brings water from deep underground. It was at first a mission station of the London Missionary Society founded by Robert Moffat in 1821. It was also the place where David Livingstone arrived for his first position as a missionary in 1841. The Kuruman River, which is dry except for flash floods after heavy rain, is named after the town.

Kuruman is regarded as the "Oasis of the Kalahari". It is set out on the Ghaap Plateau and receives its water source from a spring called "The Eye" which rises in a cave in the semi-desert thornveld area in the Kalahari region. Kuruman is the main town in the area and the spring gives about 20 to 30 million litres of water daily to approximately 10 000 inhabitants. It is also known as "Die Oog" or "Gasegonyane" in the Kalahari region.

The name Kuruman is derived from the Chief who lived in the area, named Kudumane. Robert Moffat, a missionary from the London Missionary Society, also lived there from 1820 to 1870. Moffat helped build the famous Moffat Church which was completed in 1838 and is still used for regular church services.

While living in Kuruman, Moffat translated the bible into the Tswana language: this was the first bible in an indigenous southern African language.

The Eye was claimed to have been discovered in 1801 and this led to the establishment of the mission station in the early 19th century. The Eye then came to be described as “The fountain of Christianity”. It is the biggest natural fountain in the Southern Hemisphere. In the early years, Tswana people called this fountain “Gasegonyane” which means “small water calabash with bubbling water”.

The aerial images (Google Earth) of the study area clearly show the extensive impact caused by the development of the existing Abattoir and its related infrastructure, as well as the sections into which the intended expansion is planned. It is therefore deemed highly unlikely that any significant sites, features or material of cultural heritage (archaeological and/or historical) origin and/or significance will exist in the study area & proposed development area. The desktop study did however show that a number of known archaeological and historical sites, features and material have been identified in the larger geographical area and this needs to be taken into consideration during the proposed expansion activities.

The existing Excelsior Abattoir, with its related infrastructure has not been assessed in the field, but based on the images provided by the Environmental Assessment Practitioner, the Abattoir and the various structures here are modern and less than 60 years of age. These are therefore not protected under the National Heritage Resources Act and no further assessments are required. No demolition will in any case be undertaken with only internal changes to and extensions of the existing buildings that will be undertaken. Also, no excavations (trenching or digging of foundations etc.) will be undertaken as part of the extension work.



**Figure 3: A view of part of the existing Excelsior Abattoir.**



**Figure 4: Another view of a section of the area of the Abattoir into which the proposed expansion will take place.**



**Figure 5: Another section of the area. If any sites or material of archaeological and/or historical nature existed here in the past it would be have been extensively disturbed or destroyed.**





**Figure 6: One of the related structures at the Abattoir. All of the buildings are constructed in the same style with modern materials and face-brick.**



**Figure 7: More structures at the Abattoir showing the modern nature of the structures.**



**Figure 8: View of the specific area where the existing structures here will be extended.**



**Figure 9: The existing structures seen here will also be extended. As with the structures in Figures 6-8 these are all modern and less than 60 years of age.**

Finally, based on all the evidence obtained during the desktop study and the information provided, it is therefore recommended that Exemption from undertaking a full Phase I Heritage Impact Assessment for the proposed Expansion of the existing Excelsior Abattoir be granted to the applicants. The study and development area is located on Erven 4051 & 4052 in Kuruman, Northern Cape Province.

The following needs to be taken into consideration however:

**The subterranean nature of cultural heritage (archaeological and/or historical) resources must always be kept in mind. Should any previously unknown or invisible sites, features or material be uncovered during any development actions then an expert should be contacted to investigate and provide recommendations on the way forward. This could include previously unknown and unmarked graves and/or cemeteries.**

Should there be any questions or comments on the contents of this document please contact the author as soon as possible.

Kind regards



Anton Pelser

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