

GRAVE MANAGEMENT PLAN

FOR SOUTHERN PROTEINS, DRYDEN, MPUMALANGA PROVINCE

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Abbreviations

ASAPA: Association of South African Professional Archaeologists
GP: Generally Protected
HSMP: Heritage Site Management Plan
HCAC: Heritage Contracts and Archaeological Consulting CC
LS: Local Significance
NHRA: National Heritage Resources Act
SAHRA: South African Heritage Resources Agency

Executive Summary

Southern Proteins is a rendering facility that processes waste from the poultry abattoirs. The facility reprocesses the abattoir waste (intestine, chicken feathers, full chickens, etc.) obtained from the local abattoirs using high steam pressure to produce high protein meals for animal feeds, which is their final product. The facility is situated just 8km outside Delmas in Mpumalanga Province. The site is situated within 500m radius of a wetland zone, further there is an artificial wetland which Southern Proteins discharges into, and further release to a trench that flows to the nearby stream. Water samples are collected at different sites as identified by the Department of water affairs and during the water sampling around 75 graves were discovered.

The graves were not identified by the previous consultant during the EIA in 2012, Southern Proteins is in the position of the SAHRA comments and reported the find to an archaeologist who assessed the site. Southern Proteins seeks to ensure the sustainable protection of the cemetery as well as other possible graves/ burial sites on their properties. HCAC was appointed to develop a Heritage Site Management Plan (HSMP) for the cemetery. The objective and purpose of the HSMP can be summarised as follows.

Objective and Purpose of the HSMP	
Objective:	1. Define management and mitigation measures for <i>in situ</i> conservation of the cemetery.
Purpose	1. Recognise the significance and sensitivity of the identified and potential unidentified cemeteries/burial grounds; 2. Understand the potential risks to cemeteries from operations at the rendering facility; and 3. Ensure that the potential risks are assessed and controlled to an acceptable level.

The preservation mechanism defined in this HSMP for implementation include:

Preventative protection	Clearly determine extent of the cemetery and delineate boundaries
	Replace the existing trench with a pipe to ensure that the overflow of discharge is channelled away from the grave sites to avoid direct or indirect impacts.
	Establish fencing with access gate to provide physical barrier.
	Establish a 30 m buffer zone around the cemetery
	Complete annual maintenance to remove overgrowth and reduce intensity of natural degradation processes.
Monitoring	Quarterly monitoring.

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1. INTRODUCTION

Southern Proteins is a rendering facility that processes waste from the poultry abattoirs. The facility reprocesses the abattoir waste (intestine, chicken feathers, full chickens, etc.) obtained from the local abattoirs using high steam pressure to produce high protein meals for animal feeds, which is their final product. The facility is situated just 8km outside Delmas in Mpumalanga Province. The plant is in the position of both an Environmental authorization and all relevant Licences, i.e., the Waste management licence, Water use licence and the Air Emission Licence. As part of these processes a Heritage Impact Assessment (HIA) was conducted and SAHRA subsequently commented on the project (Case 773 and 9670) – Annexure A. .

The site is situated within a 500m radius of wetland zone, further there is an artificial wetland which Southern Proteins discharges into, the manmade further release to a trench that flows to the nearby stream. Water samples are collected in different sites as identified by the Department of water affairs; it is during the water sampling that graves were discovered.

The graves that were visible counted to 73- 75. The graves were not identified by the previous consultant during the EIA in 2012, Southern Proteins is in the position of the SAHRA letter of authorization. This document serves as a Heritage Site Management Plan (HSMP) for the cemetery. The objective, purpose and goal of the HSMP is briefly outlined below:

1.1 Document Objective

Develop an implementable HSMP to comply with Section 38(3)(g) of the National Heritage Resources Act (NHRA) that defines management and mitigation measures for *in situ* conservation of cemeteries that aims to remove/reduce the risk to the heritage resource.

1.2 Purpose

The purpose of the HSMP is to:

1. Recognise the significance and sensitivity of the identified and potential unidentified cemetery/ burial grounds;
2. Understand the potential risks to the cemetery from the operations of the rendering facility;
and
3. Ensure that the potential risks are assessed and controlled to an acceptable level.

1.3. Goals and aims of the HSMP

1.3.1. Goals

The goals of the HSMP for the project are to ensure the following:

- » Increased general awareness of the the identified and potential unidentified cemetery/ burial grounds;
- » A balanced approach between development, conservation and utilization;
- » Easy, clear guidelines on cost effective maintenance and management of the identified and potential unidentified cemetery/ burial grounds in the project area.

1.3.2. Aims

The aims of the HSMP for the project include:

- » To define management responsibilities for the identified graves.
- » To provide clear management actions for the identified graves as well as chance finds.

- » To provide a management framework to monitor and define the success of the HSMP.

1.4 Scope

Applies to all Southern Proteins employees and contractors as well as business partners.

1.4. Principles and legal framework

The principles of this document are informed by the following legislative framework.

Table 1. Legal guidelines considered.

Applicable guidelines considered	Reference where applied
Development of an HSMP as provided for in Section 47 (3) of the National Heritage Resources Act No 25 of 1999 (NHRA)	Compilation of a HSMP was commissioned to ensure the responsible management of identified and potentially unidentified grave sites on the properties earmarked for agricultural development.
The Extension of Security of Tenure Act, 1997. Chapter III Section 6(4)	Any person shall have the right to visit and maintain his or her family graves on land which belongs to another person, subject to any reasonable condition imposed by the owner or person in charge of such land in order to safeguard life or property or to prevent the undue disruption of work on the land.
National Heritage Resource Act 25 of 1999	<p>(3) No person may, without a permit issued by the South African Heritage Resource Agency (SAHRA) or a provincial heritage resources authority—</p> <p>(d) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;</p> <p>(e) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or</p> <p>(f) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.</p>

2. BACKGROUND TO THE PROJECT

HCAC was requested to assist with a management plan for the *in-situ* preservation of a cemetery on the property owned by Southern Proteins on the farm Weltevreden, in the Dryden area. This included a site visit to assess site conditions and subsequently to develop a HSMP to ensure the continued *in-situ* protection of the identified cemetery.

2.1 Location

The study area is located on the Remainder of Portion 45 of the Farm Weltevreden, Mpumalanga Province at the following coordinates (Lat/Lon: 26° 06' 49.3703" S, 28° 44' 47.7745" E). The site is located close to Eloff (Figure 1 & 2).

2.2. Nature of the development

The site is situated within a 500m radius of a wetland zone, further there is an artificial wetland which Southern Proteins discharges into, from the artificial wetland the water is further release to a trench that flows to the nearby stream. Water samples are collected in different sites as identified by the Department of water affairs; it is during the water sampling that graves were discovered. Although the cemetery will not be directly impacted on by the planned development the client seeks to ensure the correct way to protect and manage the cemetery and it is imperative to implement management measures that will ensure that no indirect impacts occur on the graves due to the water surrounding the cemetery.

2.3 Location Map

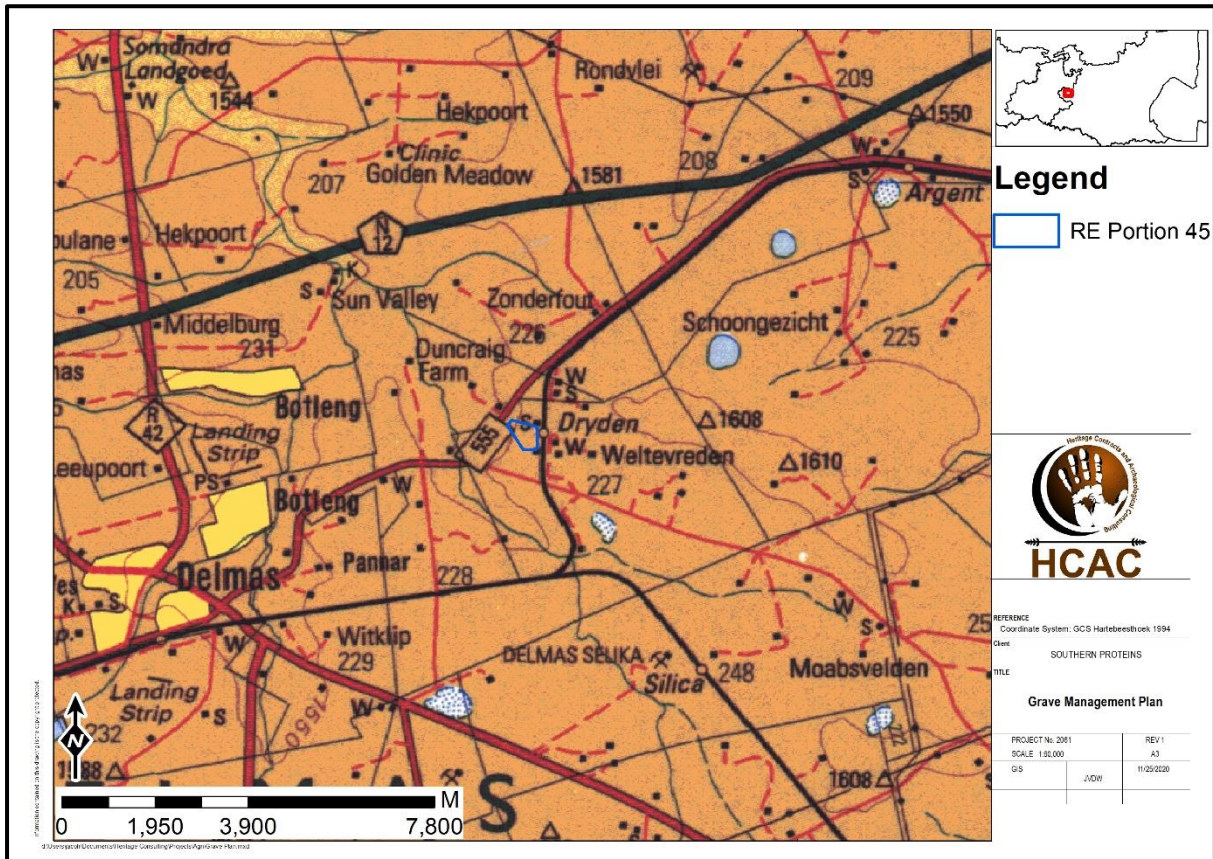


Figure 1. Regional locality map indicating the study area.

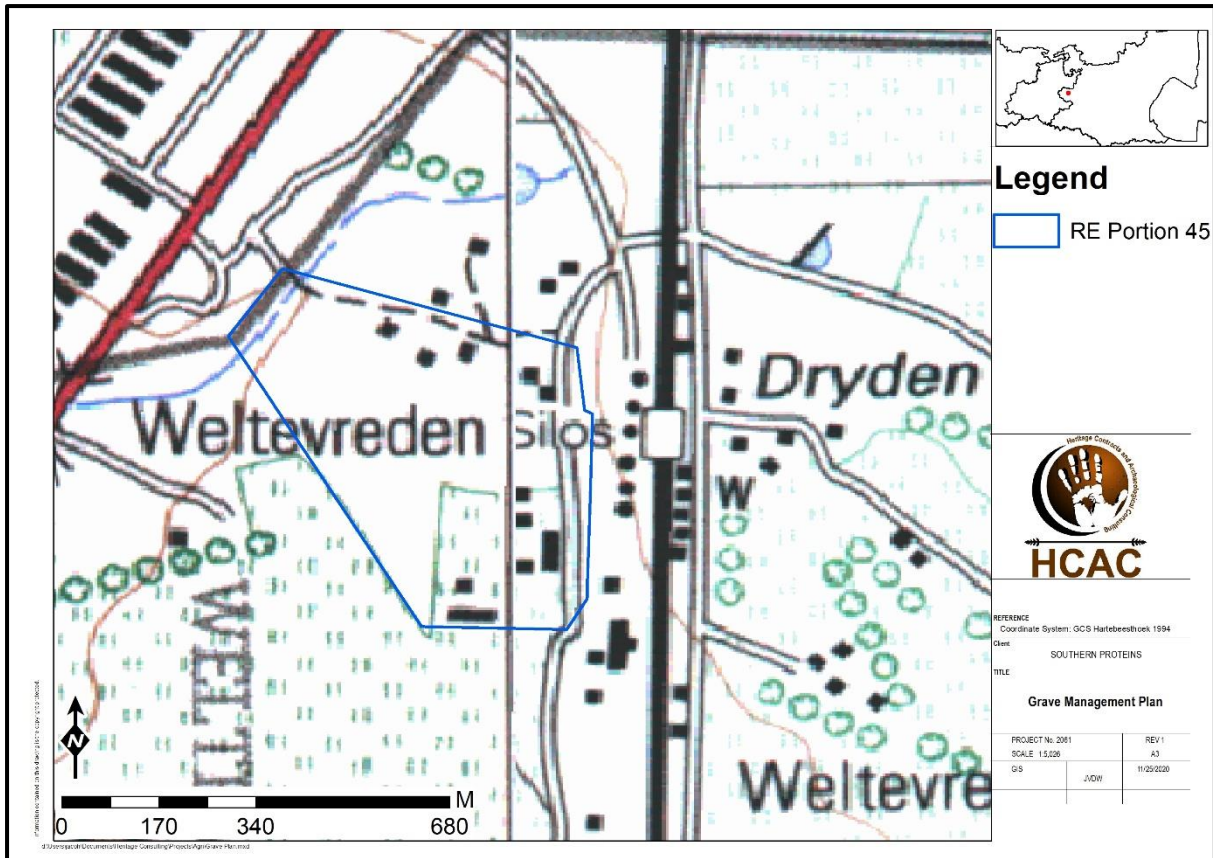


Figure 2. 1: 50 000 Locality map indicating the study area.

3. PROJECT SCOPE

HCAC was appointed to develop a HSMP for Southern Proteins for a known cemetery on the farm Weltevreden, Dryden to ensure the ongoing protection and management of the cemetery as well as unidentified grave sites that might occur throughout the Southern Proteins operation that can have an impact on both known and unknown graves. It is therefore important that the HSMP includes the development of preservation mechanisms that will minimise and avoid negative changes/impacts to cemeteries.

4. SITE DEFINITION

The recorded heritage site comprises an established cemetery on the Remainder of Portion 45 of the Farm Weltevreden, Dryden (Figure 3). The cemetery is not fenced but the graves are clearly marked and grave dressings consist mostly of stone packed graves (Figure 4 – 5). The site is situated within a 500m radius of a wetland zone, further there is an artificial wetland which Southern Proteins discharges into, from the artificial wetland the water is further release to a trench that flows to the nearby stream. Water from the wetlands are now seeping into the cemetery. The cemetery was visited in October 2020 and the area was extremely wet after heavy rains further compounding the problem of run off water (Figure 6 -9), during the dry season the graves are not water flooded (Figure 10 - 11).

During the site visit it was clear that the graves are not maintained and the site is overrun with effluent, to such an extent that an accurate count of the graves was not possible (Figure 4 – 9).



Figure 4. Current site conditions at cemetery.



Figure 5. Current site conditions at cemetery



Figure 6. Wetland area with the Protein feeds operation in the background.



Figure 7. Existing trench for channeling water into the nearby stream.



Figure 8. Trench from the protein feeds operations to channel water to the nearby stream.



Figure 9. General site conditions (wetland)



Figure 10. General site conditions during the dry season (2017).



Figure 11. General site conditions.

5. DATA INTERPRETATION: ASSESSMENT OF SIGNIFICANCE

5.1 Significance of Sites

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface.

This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites that will be impacted on. The following criteria were used to establish site significance:

- » The unique nature of a site;
- » The integrity of the archaeological/cultural heritage deposits;
- » The wider historic, archaeological and geographic context of the site;
- » The location of the site in relation to other similar sites or features;
- » The depth of the archaeological deposit (when it can be determined/is known);
- » The preservation condition of the sites;
- » Potential to answer present research questions.

Furthermore, The National Heritage Resources Act (Act No 25 of 1999, Sec 3) distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- » Its importance in/to the community, or pattern of South Africa's history;
- » Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- » Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- » Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- » Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- » Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- » **Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;**
- » Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- » Sites of significance relating to the history of slavery in South Africa.

Although the Graves in the cemetery were not assessed against historic criteria as defined in Section 3(3) of the NHRA, it should be noted that graves and burial sites have specific connections to communities or groups for spiritual reasons. The significance is universally accepted. The cemetery is well preserved and the integrity of the cemetery is considered to be excellent.

5.2. Field Rating of Sites

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

FIELD RATING	GRADE	SIGNIFICANCE	RECOMMENDED MITIGATION
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site 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)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP. B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

Graves are considered to be of high social significance and based on this is given a **Generally Protected A** field rating.

6. HERITAGE MANAGEMENT ACTIONS

6.1. Heritage Management Actions

In terms of the day to day management of cemeteries in the project area the following preservation mechanisms are suggested:

Table 2. Management Actions

Objective	Action	Responsible Party
Avoid accidental damage or destruction of the cemetery during agricultural activities	<ul style="list-style-type: none"> • Increase awareness of the site (training and indication on development plans) • Indicate the cemetery on all development plans • Fence the cemetery • Maintain a 30 m buffer zone around the cemetery 	Management
Ensure continuous protection of the cemetery	<ul style="list-style-type: none"> • Future developments in these areas should be limited and if development cannot be avoided in these areas, the development will be subject to SAHRA approval and the correct permit application procedure. • The site should be monitored and maintained (cleaned) on an ongoing basis. 	Management

6.2. Heritage Awareness

It is important to ensure that all employees and contractors working within the Southern Properties operations are aware of the applicable heritage legislation and how to identify possible grave sites as well as what heritage resources are. It is recommended that this is communicated during induction training as well as through notices placed in strategic places.

Should it not be possible to retain the burial sites, the graves should be relocated with the required permits from the SAHRA and according to the required process from the NHRA but must be seen as a last resort. This process should be overseen by a qualified archaeologist. The grave relocation process must include as a minimum:

- » A detailed social consultation process, that will trace the next-of-kin and obtain their consent for the relocation of the graves, that will be at least 60 days in length;
- » Site notices and newspaper advertisements indicating the intent of the relocation;
- » Relevant permits from the local authority and Provincial Department of health as well as a permit from the SAHRA for graves older than 60 years or unidentified and presumed older than 60 years;
- » An exhumation process that demonstrates respect for the remains and family;

- » The whole process must be managed preferably by a company that has a proven track record in grave relocations;
- » The process must be conducted in such a manner as to safeguard the legal rights of all parties involved

7. Chance Find Procedures

The following procedural guidelines must be considered in the event that previously unknown heritage resources or burial grounds and graves are exposed or found during the life of the project by activities such as bush clearing:

Chance Find Procedures: Burials and Graves

In the event that previously unidentified burial grounds and graves are identified and/or exposed during construction or operation of the Project, the following steps must be implemented subsequent to those outlined above:

- The project archaeologist must immediately be notified of the discovery in order to take the required further steps:
 - The local South African Police Service (SAPS) will be notified on behalf of the client;
 - The project archaeologist will inspect the exposed burial and determine in consultation with the SAPS if any additional graves may exist in the vicinity as well as the temporal context of the remains, i.e.:
 - forensic
 - authentic burial grave (informal or older than 60 years, NHRA (1999) Section 36); or
 - archaeological (older than 100 years, NHRA (1999) Section 38);
- Should the specialist conclude that the find is a heritage resource protected in terms of the NHRA (1999) Section 36 and NHRA (1999) Regulations (Regulation 38, 39, 40), the project archaeologist will notify SAHRA and/or LIHRA on behalf of client;
- SAHRA/LIHRA may require that an identification of interested parties, consultation and /or grave relocation take place;
- Consultation must take place in terms of NHRA (1999) Regulations 39, 40, 42; and 5. Grave relocation must take place in terms of NHRA (1999) Regulations 34.

8. CONCLUSION

Southern Proteins should be commended for recognising that graves are special places that link communities to the past, memorialise deceased and serve as sacred places to remember and celebrate their lives and as owners of the property will endeavor to maintain *in situ* conservation of the site and also for their swift management of the find. A summary of recommended mitigation measures for cemetery's are included in Table 3.

Table 3. Mitigation Measures

Phase	Aspect	Management and Mitigation Measures	Timeframe
Operation Phase	Graves and burial sites	<ul style="list-style-type: none"> It is recommended that the current trench should be replaced with a pipe to discharge the effluent and ensure that the overflow is limited to an area away from the graves. The area should be monitored weekly to ensure that the graves remain in tact and dry; Preservation of graves <i>in situ</i>; Indicate the known cemetery on development plans; Graves should be demarcated with an access gate for family members and a 30 m buffer zone; 	Ongoing
All phases of the project	All heritage sites	<ul style="list-style-type: none"> Increasing heritage awareness Implementation of a chance find procedure 	Ongoing

The Chance Find Procedures presented in this document serve as best practice policy for the accidental discovery of burial grounds and graves. Based on the principles provided within this document and the proposed lines of communication, Southern Proteins will be able to mitigate the accidental discovery of heritage resources and burial grounds and graves throughout the various phases of the project.

9 REFERENCES

National Heritage Resource Act 25 of 1999

The Extension of Security of Tenure Act, 1997. Chapter III Section 6(4)