CULTURAL HERITAGE IMPACT ASSESSMENT OF DISTRICT ROAD D 1851 NDUMO, NORTHERN KWAZULU-NATAL.



ACTIVE HERITAGE cc.

Frans Prins MA (Archaeology)

P.O. Box 947 Howick 3290

Activeheritage@gmail.com

Fax: 0867636380

www.activeheritage.webs.com

27 October 2014

TABLE OF CONTENTS

1	BACKGROUND INFORMATION ON THE PROJECT	T
•	1.1. Details of the area surveyed:	
2	BACKGROUND TO ARCHAEOLOGICAL HISTORY OF AREA	2
3	BACKGROUND INFORMATION OF THE SURVEY	6
	3.1 Methodology	
	3.2 Restrictions encountered during the survey	7
	3.2.1 Visibility	7
	3.2.2 Disturbance	
	3.3 Details of equipment used in the survey	7
4	DESCRIPTION OF SITES AND MATERIAL OBSERVED	7
	4.1 Locational data	7
	4.2 Description of heritage resources located during the survey	7
5	STATEMENT OF SIGNIFICANCE (HERITAGE VALUE)	8
	5.1 Field Rating	8
6	RECOMMENDATIONS	9
7	RISK PREVENTATIVE MEASURES ASSOCIATED WITH CONSTRUCTION	9
8	MAPS AND PHOTOGRAPHS	. 10
9	REFERENCES	. 12
Α	NPPENDIX 1	D PHOTOGRAPHS
L	IST OF TABLES	
	able 1. Background information	
T	able 2. Field rating and recommended grading of sites (SAHRA 2005)	8

LIST OF ABBREVIATIONS AND ACRONYMS

EIA	Early Iron Age
ESA	Early Stone Age
HISTORIC PERIOD	Since the arrival of the white settlers - c. AD 1820 in this part of the country
IRON AGE	Early Iron Age AD 200 - AD 1000 Late Iron Age AD 1000 - AD 1830
IIA	Intermediate Iron Age
ISA	Intermediate Stone Age
LIA	Late Iron Age
LSA	Late Stone Age
MSA	Middle Stone Age
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998 and associated regulations (2006).
NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999) and associated regulations (2000)
SAHRA	South African Heritage Resources Agency
STONE AGE	Early Stone Age 2 000 000 - 250 000 BP Middle Stone Age 250 000 - 25 000 BP Late Stone Age 30 000 - until c. AD 200

EXECUTIVE SUMMARY

A cultural heritage survey of a proposed upgrade of the District Road D 1851 in Ndumo, northern KwaZulu-Natal located one heritage site on the footprint. This Middle Stone Age surface occurrence is situated approximately 50m to the north of the proposed road upgrade. It would be possible to maintain a buffer zone of 10 m around the site. There is no known archaeological reason why the development may not proceed as planned for the remainder of the study area. However, it should be noted that the general area is rich in archaeological and contemporary grave sites. Construction work may expose material and attention is drawn to the South African Heritage Resources Act, 1999 (Act No. 25 of 1999) and the KwaZulu-Natal Heritage Act (Act no 4 of 2008) which, requires that operations that expose archaeological or historical remains should cease immediately, pending evaluation by the provincial heritage agency.

1 BACKGROUND INFORMATION ON THE PROJECT

Table 1. Background information

Consultant:	Frans Prins (Active Heritage) for Terratest	
Type of development:	The project forms part of the Inkululeko Development Programme in the Ndumo region, initiated by the Province of KwaZulu Natal. The proposed upgrade extends for approximately 10, 0 km, from km 0.0 at the P435 Intersection at Ndumo through to the end at the concrete strip road at the military base. The road is located in a region of KwaZulu-Natal that has been historically impoverished by a lack of infrastructure. The proposed road upgrade serves to complete the ring road that traverses through the Ndumo village (Figs 1 and 2).	
	The existing D 1851 road will be widened from approximately 5 m to 7 m. Sidewalks may be incorporated where appropriate, and will generally be located remotely from the road prism. The existing D 1851 road is an unsurfaced sand road which will be surfaced during the upgrade. It is anticipated that existing pipe and box culverts will be rehabilitated or replaced.	
Rezoning or subdivision:	Not applicable	
Terms of reference	To carry out a Heritage Impact Assessment as subcontracted by Terratest.	

Legislative requirements:	The Heritage Impact Assessment was carried out in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and following the requirements of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) and the KwaZulu-Natal Heritage Act, 1997 (Act No. 4 of 2008)
---------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

1.1. Details of the area surveyed:

The study area is situated along the District Road D 1851 near Ndumo in northern KwaZulu-Natal (Fig 1). The proposed upgrade extends for approximately 10, 0 km, from km 0.0 at the P435 intersection at Ndumo through to the end at the concrete strip road at the military base. The GPS coordinates for the footprint is as follows:

Start point: S 26° 55' 27.71" E 32° 15 05.55" Mid-point: S 26° 56' 49.20" E 32° 17' 10.90" End point: S 26° 55' 27.69" E 32° 15' 05.83"

2 BACKGROUND TO ARCHAEOLOGICAL HISTORY OF AREA

The greater Maputaland is endowed with heritage sites of various traditions and periods spanning the Stone Ages, Iron Ages and the historical period. However, the majority of these occur to the west of the Phongola River in the foothills of the Lebombo Mountains. A second large concentration occurs adjacent to and on the dune gordon along the coastline. The coastal plain, by contrast to the rest of Maputaland, is devoid of known archaeological sites. Oliver Davies, an archaeologist who conducted pioneer research and surveys in northern KwaZulu Natal in the 1960's and 1970's, commented that the coastal plain was unpromising for archaeological research due to its being covered by superficial sands and bush coverage which affect preservation and visibility (Avery, 1980). By contrast, the foothills of the Lebombo in the vicinity of Ingwavuma is well endowed with archaeological sites. The provincial heritage data base of the KwaZulu-Natal Museum lists twenty nine sites in the Ingwavuma magisterial district. These include Early Stone Age, Middle Stone Age, Later Stone Age and Later Iron Age sites.

Based on typological criteria it can be speculated that the known Early Stone Age sites in the greater Ingwavuma area most probably dates back to between 300 000 and 1.7 million years ago. Some of the stone tools have been identified as belonging to the Acheulian tradition and it is therefore possible that these sites were occupied by an early hominin such as *Homo erectus* or *Homo ergaster*. Middle Stone Age Sites dates back

to ca. 40 000 - 200 000 BP. These sites relate to the first anatomically modern people in the world namely *Homo sapiens sapiens*. Most of the Middle Stone Age sites in the greater Maputaland are open air stone tool scatters with little archaeological context. However, some notable cave deposits do occur. The world renowned Border Cave Site, situated approximately 65km to the north of the town of Ingwavuma, is a good example. Humans lived at Border Cave over a period of 200 000 years. The human skeletal remains found in the cave are believed to be some of the oldest evidence of anatomically modern human beings. Various radiometric-dating techniques suggest that Middle Stone Age people were living at Border Cave more than 110 000 years ago. More than a million stone artefacts have been excavated in the cave and an enormous amount of animal material has been recovered from the site as well (Derwent 2006).

Only a handful of Later Stone Age sites have been recorded in the greater Maputaland. These relate to San hunter-gatherers or their immediate ancestors. The stone tool technology are smaller and more diverse and specialised than those made during the Middle Stone Age.

The Early Iron Age of the coastal zone in Maputaland contains ceramic fragments identified as belonging to the Matola phase. The Matola phase sites can be identified with the very first Bantu-speaking agriculturists that entered KwaZulu-Natal approximately 1 600 years ago from Eastern Africa (Maggs 1989). Although oral history indicates that the area was occupied in more recent centuries times by the Thembe-Thonga or their immediate ancestors, archaeological sites belonging to this period have not yet been identified. Nevertheless, the present African inhabitants of the area, the Thembe-Thonga and the Swazi, have a rich oral history and culture relating to their intimate relationship with the environment spanning many centuries. Aspects of their cultural heritage identified by community representatives as being important include the following:

- Relationship of the local community with the physical environment
- Traditional fishing practises (fonya basket fishing)
- The indawo spirit possession cult
- Wild fruit utilisation
- The significance of the mothers brother in Thembe-Thonga social organisation
- Settlement rules and history
- Thonga language
- Issues relating to cross border identities

- Trade across the border
- History of various traditional authorities in the area
- Occupation of some areas by refugees of the Zulu wars
- Influence on local customs by refugees of the Mozambican War of 1975-1990

The conventional view is that that the historical occupants of Maputaland, the Tembe-Thonga, migrated from Karanga in the present day Zimbabwe in the middle of the seventeenth century Junod (1962:23). However, the theory that the African societies of south-east Africa migrated there in fixed ethnic units, as in the case of the Tembe-Thonga, has been questioned by archaeological research and recent research on oral traditions of Zululand and Natal (Maggs 1989). Instead of migrating there in fixed ethnic groups, it is now argued that the African societies of south-east Africa emerged locally from long established communities of diverse origins and diverse cultures and languages. Nevertheless, whether the Tembe came from Karanga to establish their authority over the people of south-east Africa, or whether they emerged locally, reports from Portuguese sailors indicate that a chief Tembe was in control of the ruling chiefdom in the Delagoa Bay hinterland in the mid-1600s (Wright & C. Hamilton 1989:46-64 and Kuper 1997:74). Tembe and his followers gradually established their authority over the people who lived in this hinterland including the area to the immediate east of the study area. Due to the abilities of their strong and charismatic leaders, the Tembe-Thonga remained a unified chiefdom and gradually extended their influence. This unity was upset in the middle of the eighteenth century when a split in the ruling lineage led to the fragmentation of the chiefdom. The division came after the death of Silamboya in 1746. The descendants of Silamboya's oldest son, Muhali, settled west of the Maputo River and north of the Usuthu River. This group, the senior branch of the Tembe-Thonga, became known as the Mututwen-Tembe. The other part of the Tembe-Thonga followed a junior son of Silamboya, Mangobe, and settled east of the Maputo River. This branch would later become known as the Mabudu or Maputo (Bryant 1965:290). The imposed international border of 1875 bisected the area where the Mabudu branch settled. Being unable to control the vast area under his control, the chief of the junior branch, Mangobe, placed his sons in strategic positions so as to ensure his control. When Mangobe died, his first son, Nkupo, was named chief. However, his younger son, Mabudu, soon established himself as the stronger leader and took the chieftainship from his older brother (Hedges 1978:137). With the army now at his disposal Mabudu was able to dominate all trade between Europeans who landed at Delagoa Bay and local people living in the hinterland. Through this domination the Mabudu became, by the middle of the eighteenth century, the strongest political and economic unit in south-east Africa (Smith 1972:178-184). The people under his authority, which gradually increased, became known as the *abakwaMabudu* or the people of Mabudu's land (Webb and Wright 1979:157). By the early 1800s the Mabudu chiefdom stretched from the Maputo River in the west to the Indian Ocean in the east, and from Delagoa (Maputo) Bay in the north to as far south as Lake St. Lucia (Felgate 1982:1). This extensive area included the present-day Ingwavuma..

During the early 1800s similar processes of political centralisation were taking place amongst the Mthetwa, Ndwandwe and later the Zulu chiefdoms to the immediate south east of Ingwavuma. The Zulu eventually defeated the other groups and established themselves as the dominant power in south-east Africa (Wright & Hamilton 1989:67 and Laband 1995). The Mabudu were never attacked by, nor directly involved in any war with the Zulu. They were, however, indirectly affected by wars of conquest the Zulu waged in the northern part of Zululand in the first half of the nineteenth century (Omer-Cooper 1975:57). Various groups of refugees passed through the Mabudu chiefdom during the reign of Shaka. Many of them settled among the Mabudu. The people who crossed the southern boundary of the Mabudu chiefdom brought with them languages and customs foreign to the Mabudu. Over time, Mabudu identity became less distinctive as people adopted many customs of those living south of them (Bryant 1964:292). As more and more people from the southern chiefdoms crossed into the Mabudu chiefdom, an increasing amount of prestige was attached to being Zulu and speaking isiZulu, since the Zulu were the dominant political force. The Zulu cultural influence in the greater Ingwavuma area was, however, not complete. People who fled the onslaught of the Zulu only stayed in the area for a short period before they moved on (Felgate 1982:11). Furthermore, in exchange for tribute paid, the Zulu recognised the Mabudu as leaders of a vast territory. This, to an extent, secured their sovereignty (Bradley 1974). The relationship between the Mabudu and the Zulu differed markedly from that which the Zulu instituted with other chiefdoms. Ballard (1978) states that although the Mabudu 'paid tribute to the Zulu kings and cooperated on a military and economic level, they enjoyed much greater independence than the chiefdoms south of St. Lucia. Despite the Zulu influence, Maputaland, remained politically and culturally distinct from areas to the north, south and west. The people of the area spoke a unified language - xiRonga (Thonga). With some exceptions, notably the Ngubane and Khumalo, they accepted the rule of Mabudu chiefs (Felgate 1982:11). They practised customs that were unique to the area and differed from those of their Zulu, Swazi and Tsonga neighbours (Webster

1991:250). Nevertheless, many siSwati-speaking people crossed the nearby border and settled at Ingwavuma. Today a large percentage of the inhabitants in the immediate vicinity of Ingwavuma are Swazi people with social and political ties to Swaziland in the west.

During the colonial period the area was frequented by hunters, traders, and later missionaries (Bruton *et al* 1980). However, sites and structures associated with these activities need to be identified and placed in an inventory. Likewise during the more recent past, many refugees of Mozambique crossed the international border and settled in the area (Klopper 2004). Sites belonging to this more recent "struggle era history" are also protected by national heritage legislation and needs to be surveyed and placed in an inventory.

Apart from human history the greater Maputaland also has extensive fossil deposits and geomorphology dating back to the Cretaceous, Tertiary and Quaternary periods. The Cretaceous fauna yielded by sequences includes ammonites, bivalves, gastropods, and nautiloids in abundance. Vertebrates are uncommon, only fish and reptiles being noted so far. Plant remains are relatively abundant in the form of logs and lignite chips. The Tertiary limestone deposits contain marine macro-fossils, calcareous nanno-fossils and planktic foraminifers (Avery 1980). Shell imprints have been found imprinted in concretions to the immediate south of Thembe Elephant Park and may therefore hold palaeontological significance (Anderson 2008).

3 BACKGROUND INFORMATION OF THE SURVEY

3.1 Methodology

A desktop study was conducted of the archaeological databases housed in the KwaZulu-Natal Museum. The SAHRIS website was consulted to obtain information on past heritage surveys in the area and on heritage site particulars. In addition, the available archaeological literature covering the greater Ingwavuma area was also consulted. A ground survey of the footprint, following standard and accepted archaeological procedures, was conducted. An area of 50m was surveyed on either side of the existing District Road D 1851. Although contemporary rural homesteads occur at various localities adjacent to the D 1851, no graves were observed on the footprint.

D 1851

Restrictions encountered during the survey

3.2.1 Visibility

Visibility was good although the vegetation was dense at places. It must also be

mentioned that Anderson (2008) found various heritage sites buried below sand in the

greater Maputaland area. He noted that these sites would have been archaeologically

invisible, had it not been that the developers excavated a long and deep trench that

exposed some of these deposits. It is therefore entirely possible those archaeological

sites may also be covered in sand in the study area and that they are invisible due to

geomorphological factors.

3.2.2 Disturbance

No disturbance of any potential heritage features was noted.

3.3 Details of equipment used in the survey

GPS: Garmin Etrek

Digital cameras: Canon Powershot A460

All readings were taken using the GPS. Accuracy was to a level of 5 m.

DESCRIPTION OF SITES AND MATERIAL OBSERVED

4.1 Locational data

Province: KwaZulu-Natal

Town: Ndumo

4.2 Description of heritage resources located during the survey

Contemporary rural homesteads occur at various locations adjacent to the proposed

road upgrade, however, none of these contained any visible graves. The study area is

also not part of any known cultural landscape. However, one archaeological site was

located in the study area during the survey.

The archaeological site, a Middle Stone Age occurrence, is situated approximately 500m

to the north of the western section of the D 1851 (Figs 2 & 3). This is an open air site

and consisted of a few stone flakes and typical Middle Stone Age points made from

indurated shale (Figs 4 & 5). No bones or other archaeobotanical material occur on the

Active Heritage cc for Terratest

7

site. There is no archaeological deposit associated with the site and the archaeological artefacts are all situated out of contexts. None of the present remains are in any archaeological context and the site has little research potential. The site covers an area of approximately 15m². The GPS coordinates for this site is: S 26° 55' 30" E 32° 15' 15" E (Figs 2 & 3).

5 STATEMENT OF SIGNIFICANCE (HERITAGE VALUE)

Only one heritage site of any significance was located during this survey. However, this site, a Middle Stone Age Site, is located more than 50m from the existing D 1851 (Figs 2 & 3). Although situated within the planned development zone it would be possible to maintain a buffer zone of approximately 10m around the site. As such it is not threatened by the proposed development.

5.1 Field Rating

The Middle Stone Age Site is rated as Generally Protected C with a low significance.

Table 2. Field rating and recommended grading of sites (SAHRA 2005)

Level	Details	Action
National (Grade I)	The site is considered to be of National Significance	Nominated to be declared by SAHRA
Provincial (Grade II)	This site is considered to be of Provincial significance	Nominated to be declared by Provincial Heritage Authority
Local Grade IIIA	This site is considered to be of HIGH significance locally	The site should be retained as a heritage site
Local Grade IIIB	This site is considered to be of HIGH significance locally	The site should be mitigated, and part retained as a heritage site
Generally Protected A	High to medium significance	Mitigation necessary before destruction
Generally Protected B	Medium significance	The site needs to be recorded before destruction
Generally Protected C	Low significance	No further recording is required before destruction

6 RECOMMENDATIONS

The proposed upgrading of District Road D 1851 may proceed in terms of heritage values, however, the following rules me adhered to:

- Strictly maintain a buffer zone of 10m around the Middle Stone Age Site. No development or removal of artefacts may take place within this zone.
- Alternatively, the developer may request a Second Phase Heritage Impact
 Assessment in order to arrange for mitigation and the destruction of the site. The
 application of a permit from the provincial heritage agency Amafa will be part of
 the process.
- Although no graves were observed adjacent to the D 1851 is nevertheless a good
 policy to avoid contemporary homesteads in terms of development initiatives as
 family graves are often associated with them. Should the developer decide to
 translocate homesteads then a process of community consultation and
 negotiation must be initiated to facilitate such process (Appendix 1).
- It must also be pointed out that the KwaZulu-Natal Heritage Act requires that operations exposing graves, as well as archaeological and historical residues, should cease immediately pending an evaluation by the heritage authorities.

7 RISK PREVENTATIVE MEASURES ASSOCIATED WITH CONSTRUCTION

Maputaland has a rich archaeological history. Construction work and excavations may yield archaeological and/or cultural material. If any heritage features are exposed by construction work then all work should stop immediately and the provincial heritage agency, Amafa, should be contacted for further evaluation. Attention is drawn to the South African Heritage Resources Act, 1999 (Act No. 25 of 1999) and the KwaZulu-Natal Heritage Act (Act no 4 of 2008) which, requires that operations that expose archaeological or historical remains should cease immediately, pending evaluation by the provincial heritage agency.

8 MAPS AND PHOTOGRAPHS

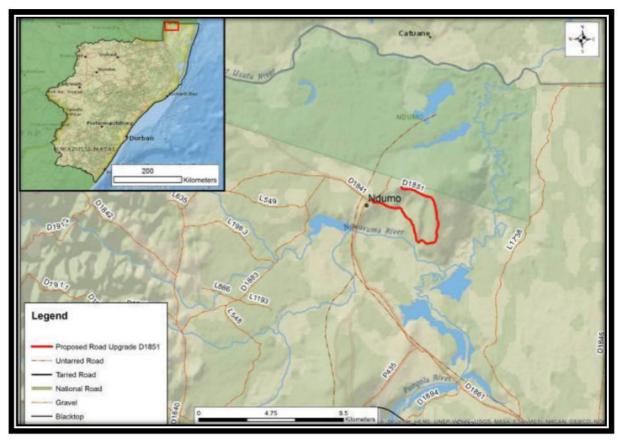


Figure 1. Locality Map showing the extent of the proposed road upgrade (Source: Terratest).



Figure 2. Google aerial photograph showing the location of the Middle Stone Age occurrence adjacent to the D 1851.



Figure 3. Location of the Middle Stone Age Site situated approximately 50m from the D 1851.



Figure 4. Middle Stone Age flakes and a point visible on the surface.

9 REFERENCES

Anderson, G. 2008. Heritage survey of the Proposed Thembe Masizwane Lodge, KwaZulu-Natal (for Exigent Environmental). Unpublished Report.

Avery, G. 1980. Palaeontology and archaeology of Maputaland. In Bruton, M. N. and Cooper, K. H. (eds). *Studies on the Ecology of Maputaland*. Rhodes University. Pg: 346-357.

Ballard, C. 1978. 'Migrant labour in Natal 1860-1879: with special reference to Zululand and the Delagoa Bay hinterland.' *Journal of Natal and Zulu History*, I, 25-42.

Bryant, A. T. 1965. Olden times in Zululand and Natal. Cape Town: C. Struik.

Bruton, M.N, Smith. M, Taylor, R. H. 1980. A Brief History of Human Involvement in Maputaland. In Bruton, M. N. & Cooper, K. H. (eds). *Studies on the Ecology of Maputaland*. Pg 432-459. Rhodes University: Grahamstown.

Derwent, S. 2006. *KwaZulu-Natal Heritage Sites: A Guide to Some Great Places*. David Phillips: Cape Town

Feely, J. 1980. Archaeological survey Mfolozi Park. Unpublished Report.

Felgate, W. S. 1982. The Tembe Thonga of Natal and Mozambique: An Ecological Approach.

Occasional Publications Number 1. Department of African Studies. University of Natal, Durban.

Hall, M. 1980. Field Survey: The Ecology of the Iron Age. Unpublished report

Hedges, D.W. 1978. *Trade and Politics in Southern Mozambique and Zululand in the Eighteenth and Early Nineteenth Centuries*. Unpublished PhD thesis, School of Oriental and African Studies, University of London: Department of History.

Junod, H.A. 1962. *The Life of a South Africa Tribe*. New York:Two Volumes, University Books Inc.

Kuper, A. 1997. 'The academic frontier: History and Social Anthropology in South Africa.' In P. McAllister (ed) *Culture and the Commonplace. Anthropological Essays in Honour of David Hammond-Tooke.* Johannesburg: Witwatersrand University Press, 69-84.

Huffman, T. N. 2007. Handbook to the Iron Age: The Archaeology of Pre-colonial Farming Societies in Southern Africa. University of KwaZulu-Natal Press. Pietermaritzburg.

Klopper, R. 2004. *Border Crossings: life in the Mozambique/South African Borderland*. Unpublished PhD thesis. University of Pretoria: Pretoria.

Maggs, T. The Iron Age farming communities. In Duminy, A. and Guest, B. 1989. *Natal and Zululand: from Earliest Times to 1910. A New History*. Pg. 28-46. University of Natal Press. Pietermaritzburg.

Mitchell, P. 2002. *The Archaeology of Southern Africa*. Cambridge University Press: Cambridge

Omer-Cooper, J.D. 1975. The Zulu Aftermath. A Nineteenth-Century Revolution in Bantu

Africa. Norfolk: Lowe & Brydone Ltd.

Penner, D. 1970. Archaeological Survey in Zululand Game Reserves. Natal Parks Board. Unpublished Report.

SAHRA, 2005. Minimum Standards for the Archaeological and the Palaeontological Components of Impact Assessment Reports, Draft version 1.4.

Smith, A. 1972. 'The trade of Delagoa Bay as a factor of Nguni politics 1750-1835.' In L. Thompson (ed) *African Societies in Southern Africa*. London: Heinemann Educational Books, 171-189.

Webb, C. and J.B. Wright (eds.) 1979. The James Stuart Archive of Recorded Oral Evidence Relating to the History of the Zulu and Neighbouring Peoples. Volume 2. University

of Natal (Pietermaritzburg) and Killie Cambell Africana Library (Durban).

Webster, D.J. 1991. 'Abafazi baThonga bafihlakala. Ethnicity and Gender in a KwaZulu border community.' In A.D. Spiegel and P.A. Mcallister (eds.), *Tradition and transition in Southern Africa: Festschrift for Phillip and Iona Mayer.* Johannesburg: Witwatersrand University Press, 243-271.

Wright, J. & C. Hamilton 1989. 'Tradition and transformations. The Phongolo-Mzimkhulu region in the late eighteenth and early nineteenth centuries.' In A. Duminy and BGuest (eds.) *Natal and Zululand from Earliest Times to 1910. A New History.*Pietermaritzburg: University of Natal, 49-82.

APPENDIX 1

RELOCATION OF GRAVES

Burial grounds and graves are dealt with in Article 36 of the NHR Act, no 25 of 1999. Below follows a broad summary of how to deal with grave in the event of proposed development.

- If the graves are younger than 60 years, an undertaker can be contracted to deal with the exhumation and reburial. This will include public participation, organising cemeteries, coffins, etc. They need permits and have their own requirements that must be adhered to.
- If the graves are older than 60 years old or of undetermined age, an archaeologist
 must be in attendance to assist with the exhumation and documentation of the
 graves. This is a requirement by law.

Once it has been decided to relocate particular graves, the following steps should be taken:

- Notices of the intention to relocate the graves need to be put up at the burial site for a period of 60 days. This should contain information where communities and family members can contact the developer/archaeologist/public-relations officer/undertaker. All information pertaining to the identification of the graves needs to be documented for the application of a SAHRA permit. The notices need to be in at least 3 languages, English, and two other languages. This is a requirement by law.
- Notices of the intention needs to be placed in at least two local newspapers and have the same information as the above point. This is a requirement by law.
- Local radio stations can also be used to try contact family members. This is not required by law, but is helpful in trying to contact family members.
- During this time (60 days) a suitable cemetery need to be identified close to the development area or otherwise one specified by the family of the deceased.
- An open day for family members should be arranged after the period of 60 days so
 that they can gather to discuss the way forward, and to sort out any problems. The
 developer needs to take the families requirements into account. This is a requirement
 by law.
- Once the 60 days has passed and all the information from the family members have been received, a permit can be requested from SAHRA. This is a requirement by law.
- Once the permit has been received, the graves may be exhumed and relocated.
- All headstones must be relocated with the graves as well as any items found in the grave.