

HERITAGE IMPACT ASSESSMENT

(REQUIRED UNDER SECTION 38(8) OF THE NHRA (No. 25 OF 1999))

FOR THE PROPOSED CLAPHAM DAM UPGRADES AND ASSOCIATED INFRASTRUCTURE NEAR BURGERSFORT, LIMPOPO PROVINCE

Type of development:

Water Infrastructure

Client:

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Environmental Impact Practitioner information:

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Developer:

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APPROVAL PAGE

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Report Title	Heritage Impact Assessment for the proposed Clapham Dam upgrades, Limpopo Province
Authority Reference Number	TBC
Report Status	Final Report
Applicant Name	Lebalelo Water User Association (LWUA)

Responsibility	Name	Qualifications and Certifications	Date
Fieldwork and reporting	Jaco van der Walt - Archaeologist	MA Archaeology ASAPA #159 APHP #114	October 2021
Fieldwork	Ruan van der Merwe - Archaeologist	BA Hons Archaeology	October 2021

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Amendments on Document

Date	Report Reference Number	Description of Amendment

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REPORT OUTLINE

Appendix 6 of the GNR 326 EIA Regulations published on 7 April 2017 provides the requirements for specialist reports undertaken as part of the environmental authorisation process. In line with this, Table 1 provides an overview of Appendix 6 together with information on how these requirements have been met.

Table 1. Specialist Report Requirements.

Requirement from Appendix 6 of GN 326 EIA Regulation 2017	Chapter
(a) Details of - (i) the specialist who prepared the report; and (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae	Section a Section 12
(b) Declaration that the specialist is independent in a form as may be specified by the competent authority	<i>Declaration of Independence</i>
(c) Indication of the scope of, and the purpose for which, the report was prepared	Section 1
(cA) an indication of the quality and age of base data used for the specialist report	Section 3.4 and 7.1.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	9
(d) Duration, Date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3.4
(e) Description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of site plan identifying site alternatives;	Section 8 and 9
(g) Identification of any areas to be avoided, including buffers	Section 8 and 9
(h) 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 8
(I) Description of any assumptions made and any uncertainties or gaps in knowledge	Section 3.7
(j) a description of the findings and potential implications of such findings on the impact of the proposed activity including identified alternatives on the environment or activities;	Section 1.3
(k) Mitigation measures for inclusion in the EMPr	Section 10.1
(l) Conditions for inclusion in the environmental authorisation	Section 10. 1.
(m) Monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 10. 5.
(n) Reasoned opinion - (i) as to whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and (ii) if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 10.3
(o) Description of any consultation process that was undertaken during the course of preparing the specialist report	Section 6
(p) A summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	Refer to BAR report
(q) Any other information requested by the competent authority	N.A

Executive Summary

Alta van Dyk Environmental Consultants (AVDE) was appointed as the Environmental Assessment Practitioner (EAP) by Lebalelo Water User Association (LWUA) to undertake the required Environmental Authorisation Process for the proposed upgrades and associated infrastructure to LWUA's Clapham Storage Dam near Burgersfort, Limpopo Province. The proposed upgrades are required as several developments have taken place around the dam and LWUA wishes to take precautionary measures should the dam overflow.

Beyond Heritage was appointed to conduct a Heritage Impact Assessment (HIA) for the project and the study area was assessed on desktop level and by a non-intrusive pedestrian field survey. Key findings of the assessment include:


- The area of influence (Aoi) for the project is limited to existing infrastructure (i.e., Clapham Storage Dam, scour outlet pipes and outlet pipeline) the latter being less than 700 meters in length following the existing bulk raw water pipeline. The outlet pipeline has the highest potential to impact on heritage resources and the field survey focused on this aspect;
- The Aoi is located within a developed area and has been altered from a heritage perspective, however an existing municipal cemetery is located adjacent to the proposed new outlet pipe;
- The area is of insignificant paleontological sensitivity and no further action is required for this aspect.

The impact of the project on heritage resources are low and the project can commence provided that the recommendations in this report are adhered to, based on the South African Heritage Resource Authority (SAHRA) 's approval.

Recommendations:

- Implementation of a chance find procedure for the project.
- The existing fenced in municipal cemetery adjacent to the outlet pipeline must be indicated on development plans and avoided. Care must be taken to ensure that access to the cemetery is not restricted for family members during the construction phase.

Declaration of Independence

Specialist Name	Jaco van der Walt
Declaration of Independence	<p>I declare, as a specialist appointed in terms of the National Environmental Management Act (Act No 108 of 1998) and the associated 2014 Environmental Impact Assessment (EIA) Regulations, that I:</p> <ul style="list-style-type: none"> • I act as the independent specialist 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 favourable to the applicant; • I declare that there are no circumstances that may compromise my objectivity in performing such work; • I have expertise in conducting the specialist report relevant to this application, 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 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; • All the particulars furnished by me in this form are true and correct; and • I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.
Signature	
Date	13/10/2021

a) Expertise of the specialist

Jaco van der Walt has been practising as a CRM archaeologist for 15 years. He obtained an MA degree in Archaeology from the University of the Witwatersrand focussing on the Iron Age in 2012 and is a PhD candidate at the University of Johannesburg focussing on Stone Age Archaeology with specific interest in the Middle Stone Age (MSA) and Later Stone Age (LSA). Jaco is an accredited member of ASAPA (#159) and have conducted more than 500 impact assessments in Limpopo, Mpumalanga, North West, Free State, Gauteng, KZN as well as he Northern and Eastern Cape Provinces in South Africa.

Jaco has worked on various international projects in Zimbabwe, Botswana, Mozambique, Lesotho, DRC Zambia, Guinea and Tanzania. Through this, he has a sound understanding of the IFC Performance Standard requirements, with specific reference to Performance Standard 8 – Cultural Heritage.

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ABBREVIATIONS

ASAPA: Association of South African Professional Archaeologists
BGG Burial Ground and Graves
BIA: Basic Impact Assessment
CFPs: Chance Find Procedures
CMP: Conservation Management Plan
CRR: Comments and Response Report
CRM: Cultural Resource Management
DEA: Department of Environmental Affairs
EA: Environmental Authorisation
EAP: Environmental Assessment Practitioner
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMPr: Environmental Management Programme
ESA: Early Stone Age
ESIA: Environmental and Social Impact Assessment
GIS Geographical Information System
GPS: Global Positioning System
GRP Grave Relocation Plan
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)
MSA: Middle Stone Age
NEMA National Environmental Management Act, 1998 (Act No. 107 of 1998)
NHRA National Heritage Resources Act, 1999 (Act No. 25 of 1999)
NID Notification of Intent to Develop
NoK Next-of-Kin
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

**Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

GLOSSARY

Archaeological site (remains of human activity over 100 years old)

Early Stone Age (~ 2.6 million to 250 000 years ago)

Middle Stone Age (~ 250 000 to 40-25 000 years ago)

Later Stone Age (~ 40-25 000, to recently, 100 years ago)

The Iron Age (~ AD 400 to 1840)

Historic (~ AD 1840 to 1950)

Historic building (over 60 years old)

1 Introduction and Terms of Reference:

Beyond Heritage was appointed to conduct a HIA for the proposed upgrades and associated infrastructure at the Clapham Dam, near Burgersfort, Limpopo Province (Figure 1.1 to 1.3). The report forms part of the Basic Assessment (BA) and Environmental Management Programme Report (EMPr) for the development.

The aim of the study is to survey the proposed development footprint to identify cultural heritage sites, document, and assess their importance within local, provincial and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999). The report outlines the approach and methodology utilized before and during the survey, which includes Phase 1, review of relevant literature; Phase 2, the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

During the survey, a large existing cemetery was recorded. General site conditions and features on sites were recorded by means of photographs, GPS locations and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report. SAHRA as a commenting authority under section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) require all environmental documents, compiled in support of an Environmental Authorisation application as defined by NEMA EIA Regulations section 40 (1) and (2), to be submitted to SAHRA for commenting. Upon submission to SAHRA the project will be automatically given a case number as reference. As such the EIA report and its appendices must be submitted to the case as well as the EMPr, once it's completed by the Environmental Assessment Practitioner (EAP).

1.1 Terms of Reference

Field study

Conduct a field study to: (a) locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points of sites/areas identified as significant areas; c) determine the levels of significance of the various types of heritage resources affected by the proposed development.

Reporting

Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with the relevant legislation, SAHRA minimum standards and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act No 25 of 1999).

1.2 Project Description

LWUA is proposing upgrades at its Clapham Dam located near Burgersfort, Limpopo Province. The proposed upgrades is required as several developments have taken place around the dam and LWUA wishes to take precautionary measures should the dam overflow. Project components and the location is outlined under Table 2 and 3.

Table 2: Project Description

Project area	The Clapham Dam and associated infrastructure is located on the Farm Clapham 118 KT Portion 0, approximately 35 km north-west of Burgersfort in the Limpopo Province.
Magisterial District	The proposed project is located in Ward 17 of the Fetakgomo Tubatse Local Municipality and Sekhukhune District Municipality.
Central co-ordinate of the development	24°30'16.63"S 30° 8'15.32"E
Topographic Map Number	2430 CC

Table 3: Infrastructure and project activities

Type of development	Water infrastructure Development
Size of development	Linear Development of approximately 700 meters.
Project Components	<p>The upgrades at Clapham Dam involves the following:</p> <ul style="list-style-type: none"> • New overflow structure (at Clapham Storage Dam); • Inlet Structure (at Clapham Storage Dam); • Repair of the damaged Clapham Storage Dam embankment undermined by rodents; • Extension of scour outlet pipes along the bulk raw water pipelines in the vicinity of the Clapham Storage Dam to prevent damage to private properties when pipelines have to be scoured for maintenance purposes; • Outlet pipeline to be constructed along the existing LWUA pipeline; • Manholes located along the outlet pipeline route (7 manholes); • Outlet structure in close vicinity of the Matadi River; • Channel from the outlet structure to the Matadi River; • Erosion protection of the riverbank at proposed outlet (approximately 70m long); • Extension of concrete encasing around the existing LWUA pipeline and repair of damaged corrosion protection of the pipeline crossing the Matadi River; and • Erosion protection of the pipeline crossing the Matadi River.

1.3 Alternatives

No alternatives were provided to be assessed although the extent of the area assessed allows for siting of the development to minimise impacts to heritage resources.



Figure 1.1. Regional setting (1: 250 000 topographical map) of the project.

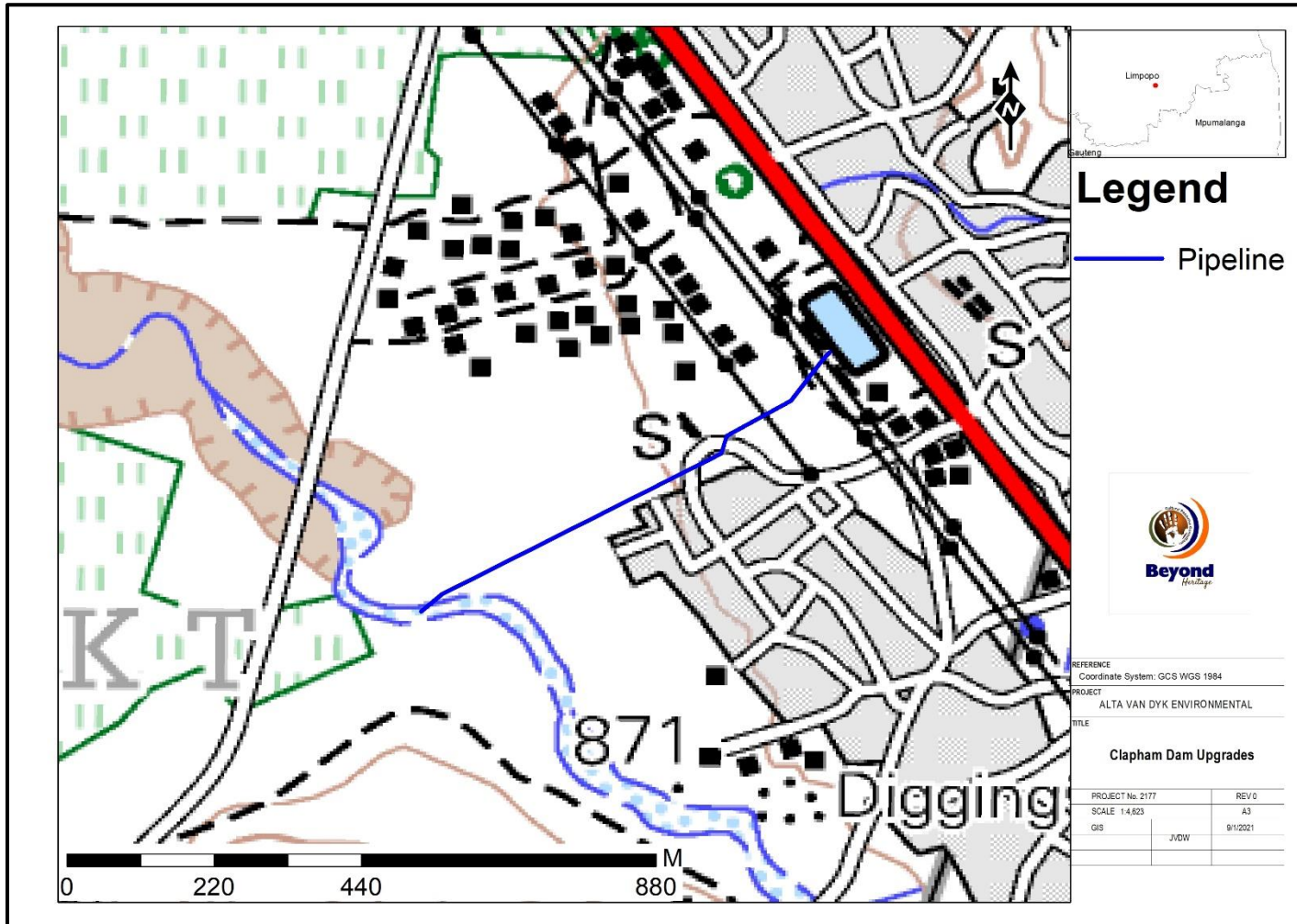


Figure 1.2. Local Setting of the project indicating the outlet pipeline from the Clapham Storage Dam to the Matadi River.

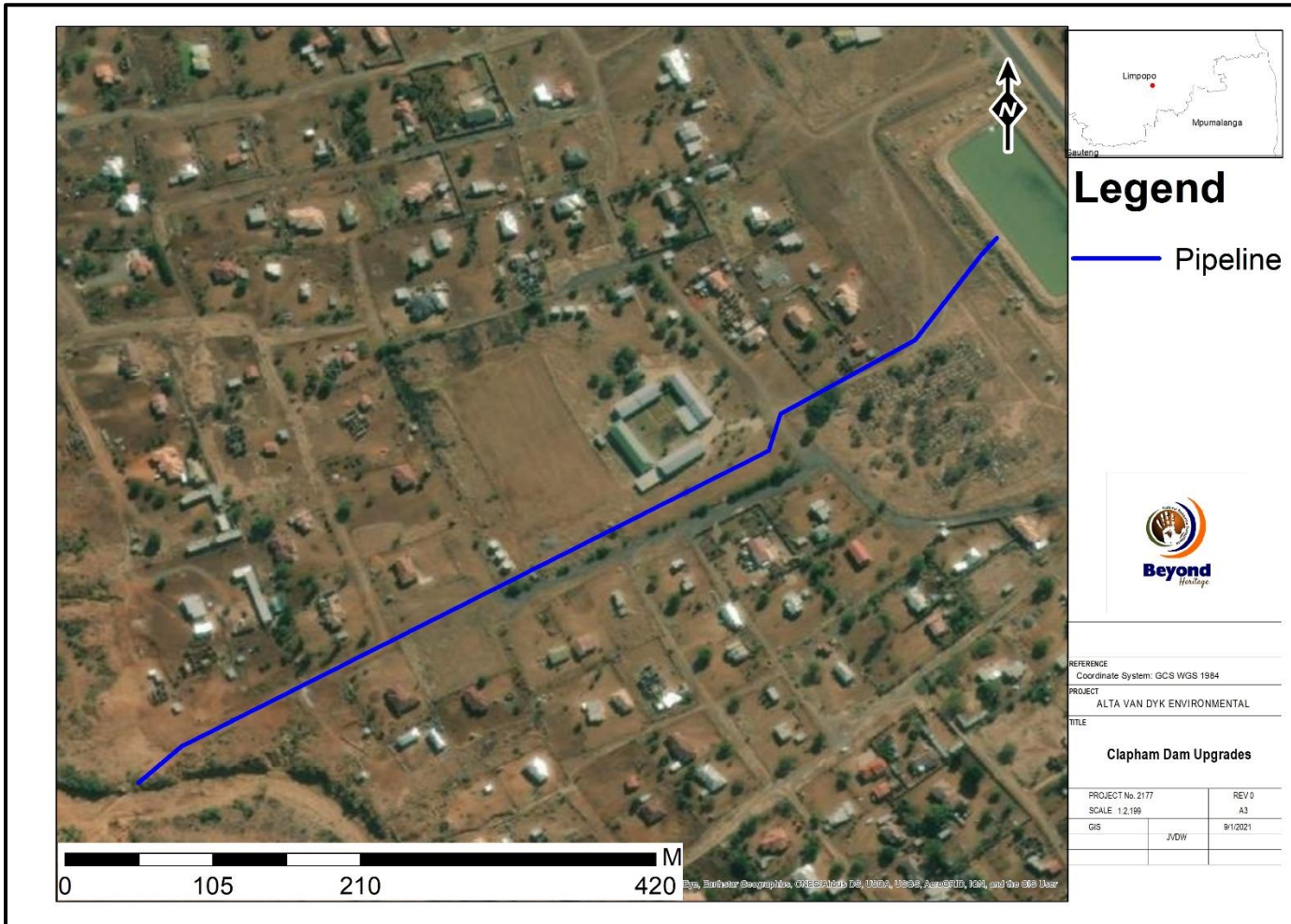


Figure 1.3. Aerial image of the environment surrounding the Clapham Storage Dam and outlet pipeline.

2 Legislative Requirements

The HIA, as a specialist sub-section of the EIA, is required under the following legislation:

- National Heritage Resources Act (NHRA), Act No. 25 of 1999)
- National Environmental Management Act (NEMA), Act No. 107 of 1998 - Section 23(2)(b)
- Mineral and Petroleum Resources Development Act (MPRDA), Act No. 28 of 2002 - Section 39(3)(b)(iii)

A Phase 1 HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources; and
- Make recommendations for the appropriate heritage management of these impacts.

The HIA should be submitted, as part of the impact assessment report or EMPr, to the PHRA if established in the province or to SAHRA. SAHRA will ultimately be responsible for the evaluation of Phase 1 HIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 HIA reports and additional development information, as per the impact assessment report and/or EMPr, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 HIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level). Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 HIA's are primarily concerned with the location and identification of heritage sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision-making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for with SAHRA by the applicant before development may proceed.

Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999 is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance No. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983) and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

3 METHODOLOGY

3.1 Literature Review

A brief survey of available literature was conducted to extract data and information on the area in question to provide general heritage context into which the development would be set. This literature search included published material, unpublished commercial reports and online material, including reports sourced from the South African Heritage Resources Information System (SAHRIS).

3.2 Genealogical Society and Google Earth Monuments

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located; these locations were marked and visited during the fieldwork phase. The database of the Genealogical Society was consulted to collect data on any known graves in the area.

3.3 Public Consultation and Stakeholder Engagement:

Stakeholder engagement is a key component of any EA process, it involves stakeholders interested in, or affected by the proposed development. Stakeholders are provided with an opportunity to raise issues of concern (for the purposes of this report only heritage related issues will be included). The aim of the public consultation process was to capture and address any issues raised by community members and other stakeholders during key stakeholder and public meetings. The process involved:

- Placement of advertisements and site notices
- Stakeholder notification (through the dissemination of information and meeting invitations);
- Stakeholder meetings undertaken with I&APs;
- Authority Consultation
- The compilation of Basic Assessment Report (BAR).

3.4 Site Investigation

The aim of the site visit was to:

- survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest;
- record GPS points of sites/areas identified as significant areas;
- determine the levels of significance of the various types of heritage resources recorded in the project area.

Table 4: Site Investigation Details

	Site Investigation
Date	21 September 2021
Season	Spring – Archaeological visibility is low due to the area being altered by existing developments. Two areas were not physically walked due to access restrictions but were visually inspected, the project area and Aol was sufficiently covered to understand the heritage character of the area (Figure 3.1).

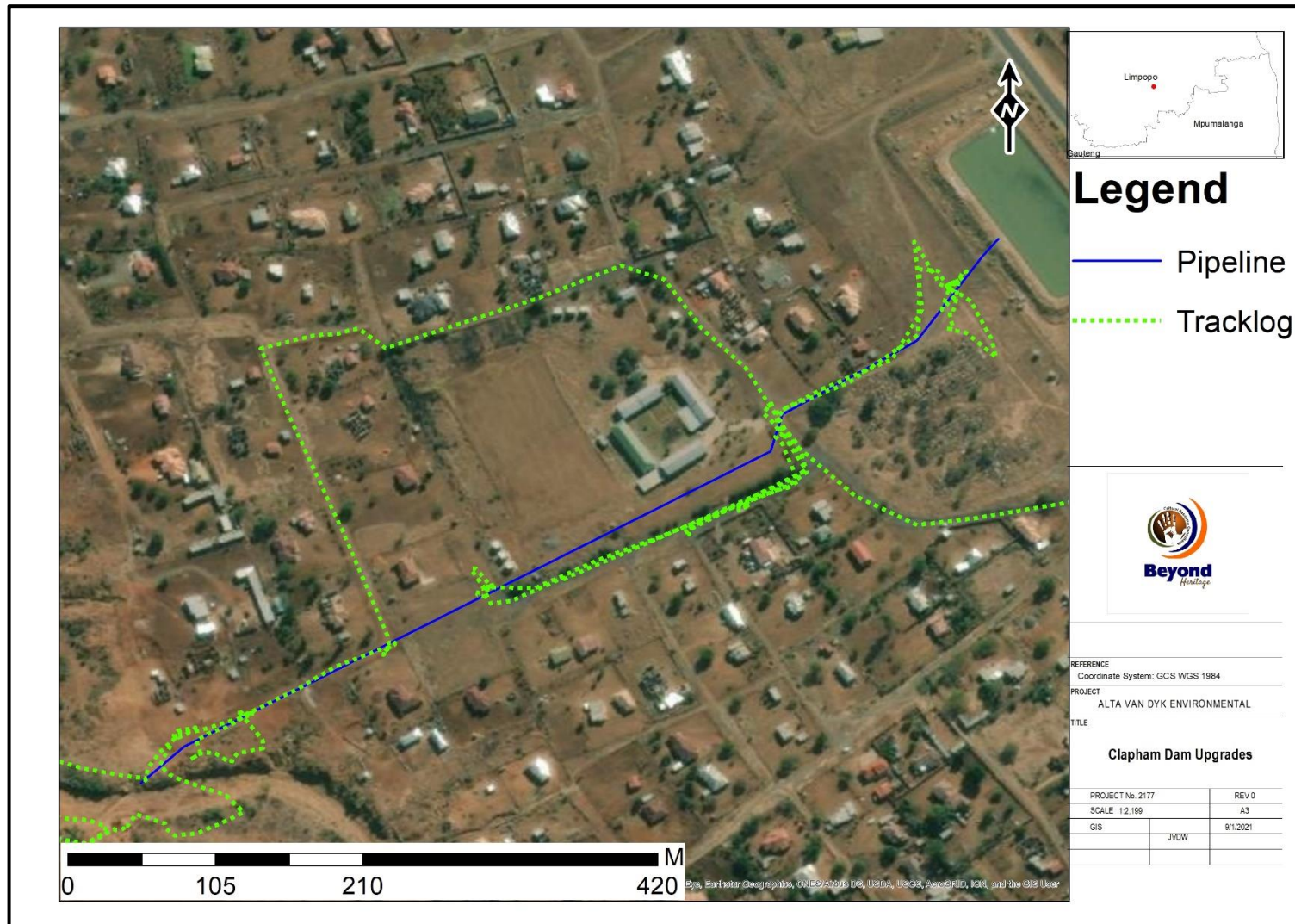


Figure 3.1: Tracklog of the survey in green.

3.5 Site Significance and Field Rating

Section 3 of the NHRA 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.

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 the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. 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. The following criteria were used to establish site significance with cognisance of Section 3 of the NHRA:

- 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; and
- Potential to answer present research questions.

In addition to this criteria field ratings prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 10 of this report.

Table 5. Heritage significance and field ratings

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

3.6 Impact Assessment Methodology

The following impact assessment methodology was provided by the AVDE:

The significance of the identified impacts will be determined using an accepted methodology from the Department of Environmental Affairs and Tourism Guideline document on EIA Regulations, April 1998 as provided by the EAP. As with all impact methodologies, the impact is defined in a semi-quantitative way and will be assessed according to methodology prescribed in the following section.

Scale utilised for the evaluation of the Environmental Risk Ratings

Evaluation Component	Rating	Scale	Description / criteria
MAGNITUDE of negative impact (at the indicated spatial scale)	10	Very high	Bio-physical and/or social functions and/or processes might be <i>severely</i> altered.
	8	High	Bio-physical and/or social functions and/or processes might be <i>considerably</i> altered.
	6	Medium	Bio-physical and/or social functions and/or processes might be <i>notably</i> altered.
	4	Low	Bio-physical and/or social functions and/or processes might be <i>slightly</i> altered.
	2	Very low	Bio-physical and/or social functions and/or processes might be <i>negligibly</i> altered.
	0	Zero	Bio-physical and/or social functions and/or processes will remain <i>unaltered</i> .
MAGNITUDE of POSITIVE IMPACT (at the indicated spatial scale)	10	Very high	Positive: Bio-physical and/or social functions and/or processes might be <i>substantially</i> enhanced.
	8	High	Positive: Bio-physical and/or social functions and/or processes might be <i>considerably</i> enhanced.
	6	Medium	Positive: Bio-physical and/or social functions and/or processes might be <i>notably</i> enhanced.
	4	Low	Positive: Bio-physical and/or social functions and/or processes might be <i>slightly</i> enhanced.

	2	Very low	Positive: Bio-physical and/or social functions and/or processes might be <i>negligibly</i> enhanced.
	0	Zero	Positive: Bio-physical and/or social functions and/or processes will remain <i>unaltered</i> .
DURATION	5	Permanent	Impact in perpetuity. –
	4	Long term	Impact ceases after operational phase/life of the activity > 60 years.
	3	Medium term	Impact might occur during the operational phase/life of the activity – 60 years.
	2	Short term	Impact might occur during the construction phase - < 3 years.
	1	Immediate	Instant impact.
EXTENT (or spatial scale/influence of impact)	5	International	Beyond the National boundaries.
	4	National	Beyond provincial boundaries, but within National boundaries.
	3	Regional	Beyond 5 km of the Impact Area and within the provincial boundaries.
	2	Local	Within a 5 km radius of the Impact Area .
	1	Site-specific	On site or within 100 meters of the site boundaries.
	0	None	Zero extent.
IRREPLACEABLE loss of resources	5	Definite	Definite loss of irreplaceable resources.
	4	High potential	High potential for loss of irreplaceable resources.
	3	Moderate potential	Moderate potential for loss of irreplaceable resources.
	2	Low potential	Low potential for loss of irreplaceable resources.
	1	Very low potential	Very low potential for loss of irreplaceable resources.
	0	None	Zero potential.
REVERSIBILITY of impact	5	Irreversible	Impact cannot be reversed.
	4	Low irreversibility	Low potential that impact might be reversed.
	3	Moderate reversibility	Moderate potential that impact might be reversed.
	2	High reversibility	High potential that impact might be reversed.
	1	Reversible	Impact will be reversible.
	0	No impact	No impact.
PROBABILITY (of occurrence)	5	Definite	>95% chance of the potential impact occurring.
	4	High probability	75% - 95% chance of the potential impact occurring.
	3	Medium probability	25% - 75% chance of the potential impact occurring
	2	Low probability	5% - 25% chance of the potential impact occurring.
	1	Improbable	<5% chance of the potential impact occurring.
	0	No probability	Zero probability.
Evaluation Component	Rating scale and description / criteria		
CUMULATIVE impacts	<p>High: The activity is one of several similar past, present or future activities in the same geographical area, and might contribute to a very significant combined impact on the natural, cultural, and/or socio-economic resources of local, regional or national concern.</p> <p>Medium: The activity is one of a few similar past, present or future activities in the same geographical area, and might have a combined impact of moderate significance on the natural, cultural, and/or socio-economic resources of local, regional or national concern.</p> <p>Low: The activity is localised and might have a negligible cumulative impact.</p> <p>None: No cumulative impact on the environment.</p>		

Once the Environmental Risk Ratings have been evaluated for each potential environmental impact, the Significance Score of each potential environmental impact is calculated by using the following formula:

- **SS (Significance Score) = (magnitude + duration + extent + irreplaceable + reversibility) x probability.**

The maximum Significance Score value is 150.

The Significance Score is then used to rate the Environmental Significance of each potential environmental impact as per Table 8.2 below. The Environmental Significance rating process is completed for all identified potential environmental impacts both before and after implementation of the recommended mitigation measures.

Scale used for the evaluation of the Environmental Significance Ratings

Significance Score	Environmental Significance	Description / criteria
125 – 150	Very high (VH)	An impact of very high significance will mean that the project cannot proceed, and that impacts are irreversible, regardless of available mitigation options.
100 – 124	High (H)	An impact of high significance which could influence a decision about whether or not to proceed with the proposed project, regardless of available mitigation options.
75 – 99	Medium-high (MH)	If left unmanaged, an impact of medium-high significance could influence a decision about whether or not to proceed with a proposed project. Mitigation options should be relooked at.
40 – 74	Medium (M)	If left unmanaged, an impact of moderate significance could influence a decision about whether or not to proceed with a proposed project.
<40	Low (L)	An impact of low is likely to contribute to positive decisions about whether or not to proceed with the project. It will have little real effect and is unlikely to have an influence on project design or alternative motivation.
+	Positive impact (+)	A positive impact is likely to result in a positive consequence/effect, and is likely to contribute to positive decisions about whether or not to proceed with the project.

3.7 Limitations and Constraints of the study

The authors acknowledge that the brief literature review is not exhaustive on the literature of the area. Due to the nature of heritage resources and pedestrian surveys, the possibility exists that some features or artefacts may not have been discovered/recorded and the possible occurrence of graves and other cultural material cannot be excluded. Similarly, the depth of cultural deposits and the extent of heritage sites cannot be accurately determined due its subsurface nature. This report only deals with the footprint area of the proposed development and consisted of non-intrusive surface surveys. This study did not assess the impact on medicinal plants and intangible heritage as it is assumed that these components would have been highlighted through the public consultation process if relevant. It is possible that new information could come to light in future, which might change the results of this Impact Assessment.

4 Description of Socio-Economic Environment

The following information was obtained for the municipality from StatsSa.gov.za: The population size is 93 795. Of the population, 99,4% are black African, with the other population groups making up the remaining 0,6%. Of those persons aged 20 years and above, 10,7% have some primary education, 3% have completed primary education, 33,3% have some secondary education and 22% have completed matric. Of the mentioned age group, 6,6% have some form of higher education, and almost one in four (24,3%) had no form of schooling. The municipality has a weak economic base and high poverty levels. There is one shopping centre in the municipality and a few mining activities happening in the region.

Only a third of households (33,1%) have access to piped water on a community stand less than 200 m from their dwelling, followed by 30,2% who have access to piped water in the yard. Only 5,5% of households have access to piped water inside the dwelling, and 11,5% have no access to piped water.

5 Results of Public Consultation and Stakeholder Engagement:

5.1.1 Stakeholder Identification

Adjacent landowners and the public at large were informed of the proposed activity as part of the BA process. Site notices and advertisements notifying interested and affected parties were placed at strategic points and in local newspapers as part of the process.

6 Literature / Background Study:

6.1 Literature Review (SAHRIS)

The following Cultural Resource Management (CRM) studies (Table 6) were conducted in the immediate area and were consulted for this report:

Table 6. Heritage Reports conducted in the greater study area.

Author	Year	Project	Findings
Fourie, W.	2006	Heritage Impact Assessment Modulakgogo Eco Estate Mooifontein 313 KT, Tubatse Municipality, Limpopo Province Version 1.0	20 Heritage sites, ranging from the Stone Age to the Iron Age and Historic sites as well as burial sites.
Huffman, T.N and Schoeman. A.	2000	Archaeological Survey of the Lebalelo Pipeline, Sekhukuneland, Northern Province.	Stone Age and historical sites.
Roodt, F.	2013	Phase 1 heritage resources scoping report Mooihoek/Tubatse Pipeline 4D Burgersfort Limpopo Province	Stone Age, Iron Age, historical features and burial sites.

Stegman, L and Roodt, F.	2012	Phase 1 Heritage Resource Impact Assessment (Scoping & Evaluation) proposed new pipeline PH 4C Burgersfort, Limpopo statement with regard to heritage resources management	No sites
Roodt, F.	2021	Heritage Impact Assessment Report Sekgoshi Hill on the Farm Clapham 118 Kt Clapham / Lwala Section Driekop: Greater Tubatse Local Municipality Limpopo Province.	Stone packed cairns, initiation structures and intangible heritage features.

6.1.1 Genealogical Society and Google Earth Monuments

No known grave sites are indicated in the study area.

6.2 Background to the general area

6.2.1 Stone Age

South Africa has a long and complex Stone Age sequence of more than 2 million years. The broad sequence includes the Later Stone Age, the Middle Stone Age and the Earlier Stone Age. Each of these phases contains sub-phases or industrial complexes, and within these we can expect regional variation regarding characteristics and time ranges. For (CRM) purposes it is often only expected/ possible to identify the presence of the three main phases.

Yet sometimes the recognition of cultural groups, affinities or trends in technology and/or subsistence practices, as represented by the sub-phases or industrial complexes, is achievable (Lombard 2012). The three main phases can be divided as follows:

- Earlier Stone Age: associated with early Homo groups such as Homo habilis and Homo erectus. 400 000-> 2 million years ago.
- Middle Stone Age: associated with Homo sapiens and archaic modern humans. 30-300 thousand years ago.
- Later Stone Age: associated with Khoi and San societies and their immediate predecessors. Recently to ~30 thousand years ago

Middle Stone Age isolated artefacts are known to occur in the general area. Finds typically include radial cores, triangular points and flakes. These artefacts are usually scattered too sparsely to be of any significance (Van der Walt 2016). Evidence of this period has been excavated at Bushman Rock Shelter, a well-known site on the farm Klipfonteinhoek in the Ohrigstad district located about 50 km from the project area. This cave was excavated twice in the 1960s by Louw and later by Eloff. The MSA layers show that the cave was repeatedly visited over a long period. Lower layers have been dated to over 40 000 BP (Before Present) while the top layers date to approximately 27 000 BP (Esterhuizen & Smith in Delius, 2007; Bergh, 1998). At Bushman Rock Shelter the MSA is also represented and starts at around 12 000 BP but only lasted for some 3 000 years.

The LSA is of importance in geological terms as it marks the transition from the Pleistocene to the Holocene which was accompanied by a gradual shift from cooler to warmer temperatures. This change had its greatest influence on the higher lying areas of South Africa. Both Bushman Rock Shelter and another site, Heuningneskrans, have revealed a greater use in plant foods and fruit during this period (Esterhuizen & Smith in Delius, 2007; Bergh, 1998). Faunal evidence suggests that LSA hunter-gatherers trapped and hunted zebra, warthog and bovids of various sizes. They also diversified their protein diet by gathering tortoises and land snails (*Achatina*) in large quantities. Ostrich eggshell beads were found in most of the levels at these two sites. It appears that there is a gap of approximately 4 000 years in the LSA record of the greater area between 9 000 BP and 5 000 BP. This may be a result of generally little Stone Age research being conducted in the province. It is, however, also a period known for rapid warming and major climate fluctuation which may have led people to seek out protected environments in this area.

The LSA period is also associated with rock engravings and rock paintings. Approximately 400 rock art sites are distributed throughout Mpumalanga and can be divided into San rock art, herder or Khoe Khoe (Khoi Khoi) paintings (thin scattering from the Limpopo Valley) through the Lydenburg district into the Nelspruit area) and localised late white farmer paintings. Farmer paintings can be divided into Sotho-Tswana finger paintings and Nguni engravings (Only 20 engravings occur at Boomplaats, north-west of Lydenburg). Farmer paintings are more localised than San or herder paintings and were mainly used by the painters for instructional purposes (Smith & Zubieta 2007).

6.2.2 The Iron Age

The Iron Age represents the spread of Bantu speaking people and includes both the pre-Historic and Historic periods. It can be divided into three distinct periods:

- The Early Iron Age: Most of the first millennium AD.
- The Middle Iron Age: 10th to 13th centuries AD
- The Late Iron Age: 14th century to colonial period.

The Iron Age is characterised by the ability of these early people to manipulate and work Iron ore into implements that assisted them in creating a favourable environment to make a better living. Studies by Roodt (2003) cited Early Iron Age *Doornkop* sites. Most of the decorated pottery found in the greater study area belongs to the stylistic facies known as *Eiland*. This style dates to between 1550 AD and 1750 AD and was made by Sotho-Tswana people (Huffman 2007: 186-189). These Middle Iron Age Sites do not have any stone walling associated with them and is found close to cultivatable soil. Some stylistic *Marateng* pottery were also recorded presumably in association with Late Iron Age stone walled settlements. *Marateng* pottery dates to between 1650 AD and 1840 AD (Huffman 2007: 207).

The later phases of the Iron Age (AD 1600-1800's) are represented by various tribes including Ndebele, Swazi, BaKoni, and Pedi, marked by extensive stonewalled settlements found throughout the escarpment and particularly around Machadodorp, Lydenburg, Badfontein, Sekhukuneland, Roosenekal and Steelpoort. The BaKoni were the architects of a unique archaeological stone building complex who by the 19th century spoke seKoni which was similar to Sepedi. The core elements of this tradition are stone-walled enclosures, roads and terraces. These settlement complexes may be divided into three basic features: homesteads, terraces and cattle tracks.

6.2.3 Historical Information

European occupation began in 1845 when trekkers established Ohrigstad and then Lydenburg a few years later. Originally, the trekkers were interested in ivory, but they also needed land and labour for agriculture. Tensions with African communities over these needs rose to such a point that the Trekkers attacked the Pedi capital in 1852. They failed, however, to destroy Pedi authority. Somewhat later, they negotiated a peace with Sekwati and traded cattle for land. Boers then started to establish farms in the region. GS Maree, for example, settled on Mareesburg in 1871. Tensions over land and labour increased again until the ZAR attacked the Pedi capital in 1876, but this battle also failed to break Pedi resistance.

A fort was built within the junction of the Steelpoort and Spekboom Rivers, named after President Burgers (Fort Burgers) as part of an attempt to secure the borders of Sekukuni's country. The fort was manned by the Lydenburg Volunteer Corps who were placed under the command of Captain von Schlickmann. On 29 September 1876, Sekukuni attacked Fort Burgers with the object of recovering cattle supposedly looted from the Bapedi. They killed two of the volunteers. Several forts were constructed during this time to protect the Europeans. Fort Burgers was only one of these. The area around Fort Burgers, eventually became known as the town of "Burgersfort" (Van Wyk Rowe 2009).

6.3 Cultural Landscape

The cultural landscape of the region is characterised by a rural area that is extensively disturbed by mining activities and in the past by agricultural activities. From the archaeological database of the general area archaeological settlements show different land use patterns. Many agriculturally orientated societies (making Eiland, Leolo and Marateng pottery) built their villages in the valleys near cultivatable alluvium. Others (probably Ndebele) built terraced settlements on basal slopes of the valley edge, while farm labourers usually lived in the valleys as well. During the 19th Century, farmers lived around the edge of high meadows as a measure of protection. A few Middle Iron Age Eiland sites were also cited in this plateau environment.

6.4 Graves and Burial Sites

No known graves are indicated on databases consulted but graves and cemeteries are widely distributed across the landscape and can be expected anywhere. Interestingly Iron Age burials were rescued from the nearby Lwala Mine (Van der Walt 2019) and on the farm Clapham in 2003 by Hutton and Nienaber (SAHRIS).

7 Description of the Physical Environment

The Project is located between the villages of Ga-Manyaka and Ga-Selela. The existing Clapham Storage Dam is located adjacent to the R37 with the proposed outlet pipeline linking the dam and the Matadi River following the existing bulk water pipeline and an informal gravel road. The area is a mostly built-up consisting of yards, stands, roads, houses, and a school (Figure 7.1 to 7.4).

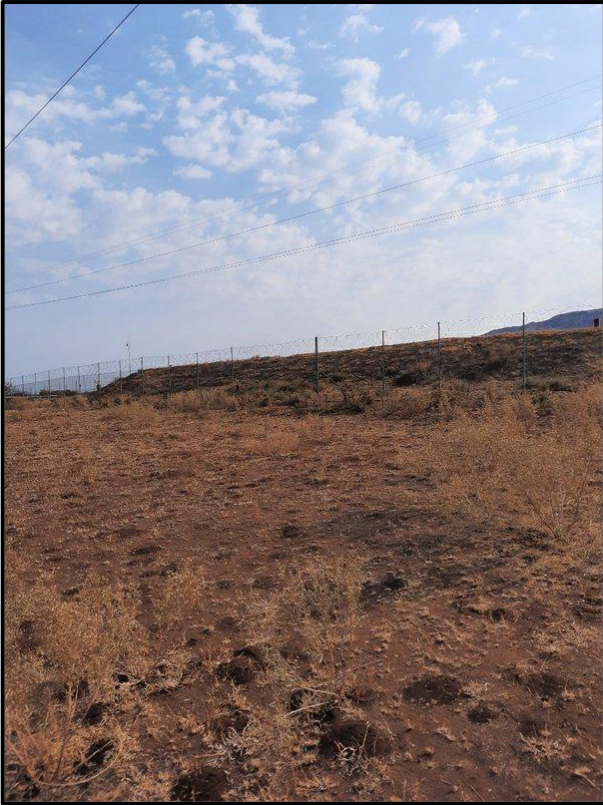


Figure 7.1. Existing storage dam.

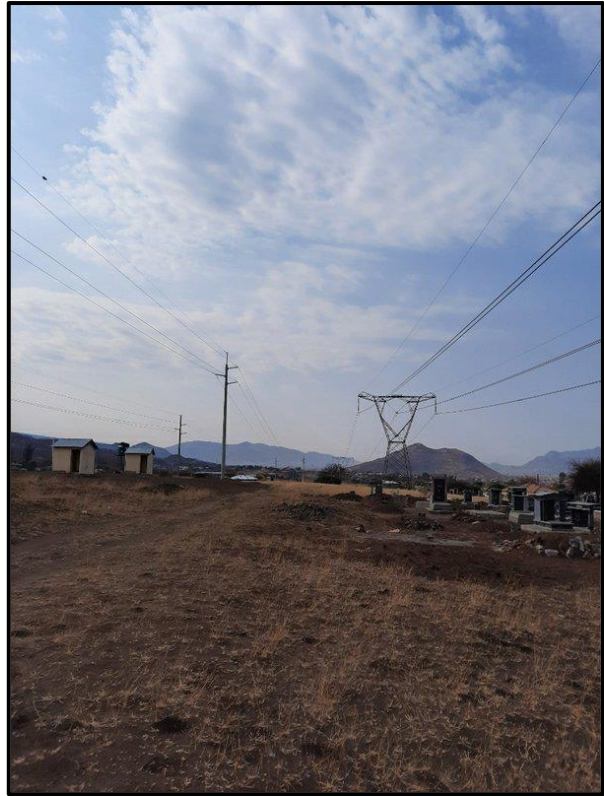


Figure 7.2. General site conditions.



Figure 7.3. School located along the proposed pipeline route.

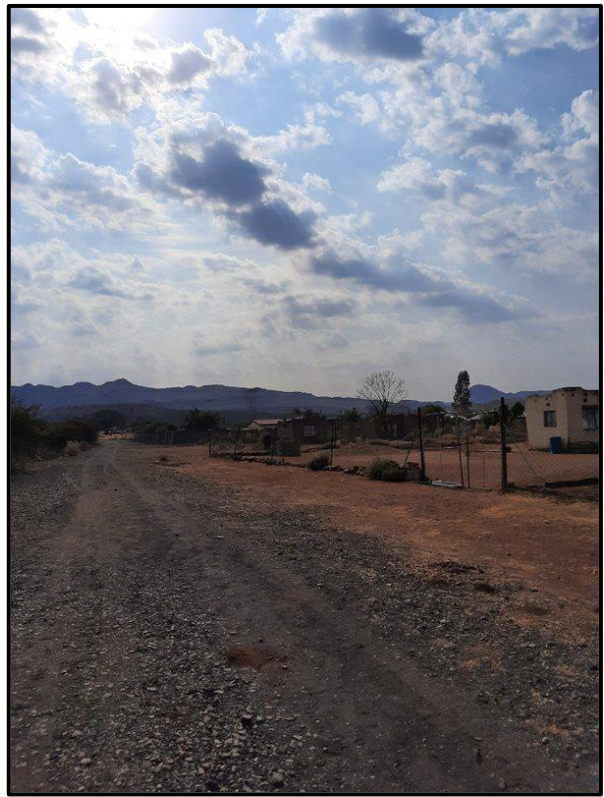


Figure 7.4. General site conditions along the proposed pipeline route.

8 Findings of the Survey

It is important to note that only the development footprint was surveyed over 1 day. The study area is disturbed from a heritage perspective by existing developments and finds were limited to an existing, fenced municipal cemetery (co-ordinates -24.4816612, 30.119235) located adjacent to the outlet pipeline to be constructed along the existing LWUA pipeline (Figure 8.1). The graves within the cemetery seem to be mostly modern graves with large granite headstones and covers although some graves are marked by stone grave dressings (Figure 8.1 to 8.3). It is estimated that there are more than a 100 graves in the cemetery over an area measuring approximately 100x100 meters and it is fenced (Figure 8.5).

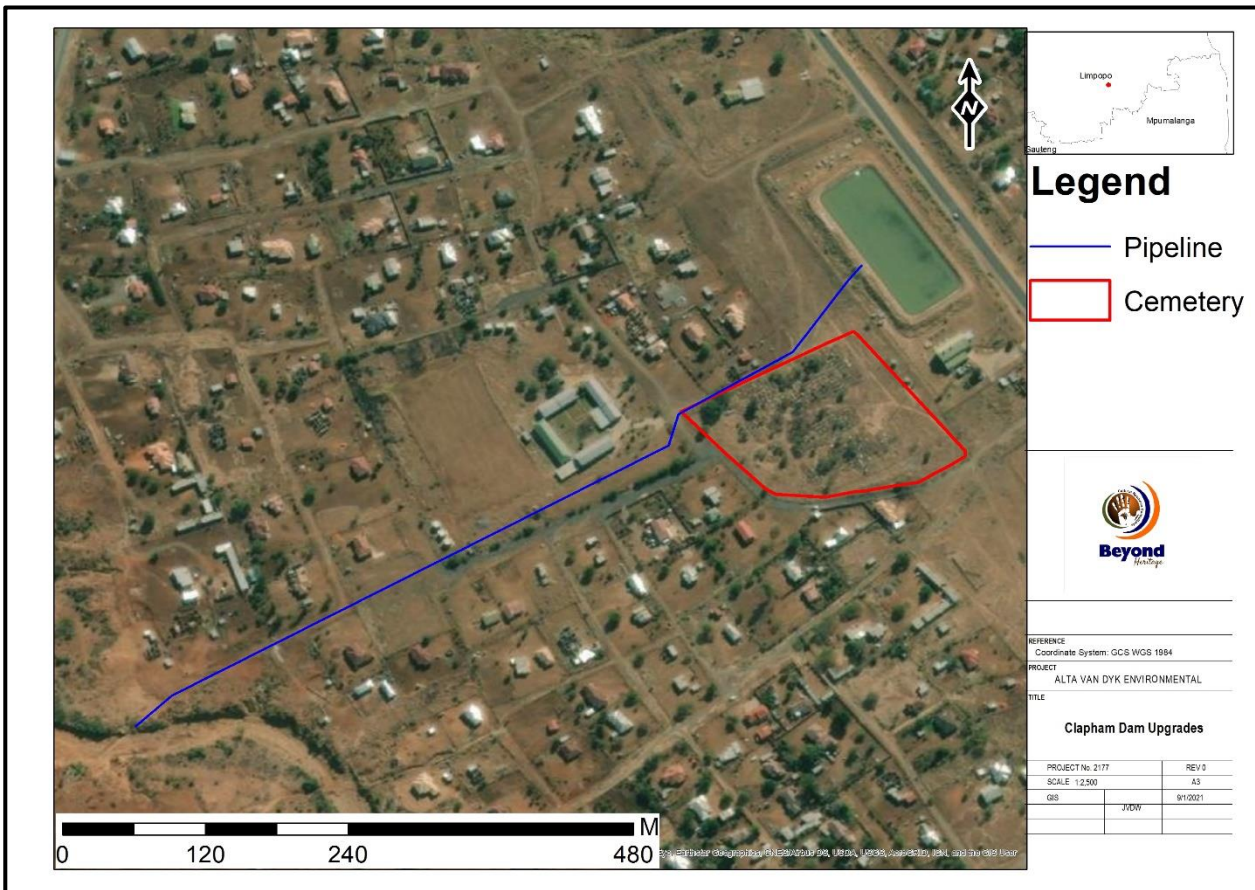


Figure 8.1. Site distribution map.



Figure 8.2. Municipal cemetery with both formal and stone packed grave dressings.



Figure 8.3. General site conditions at cemetery.



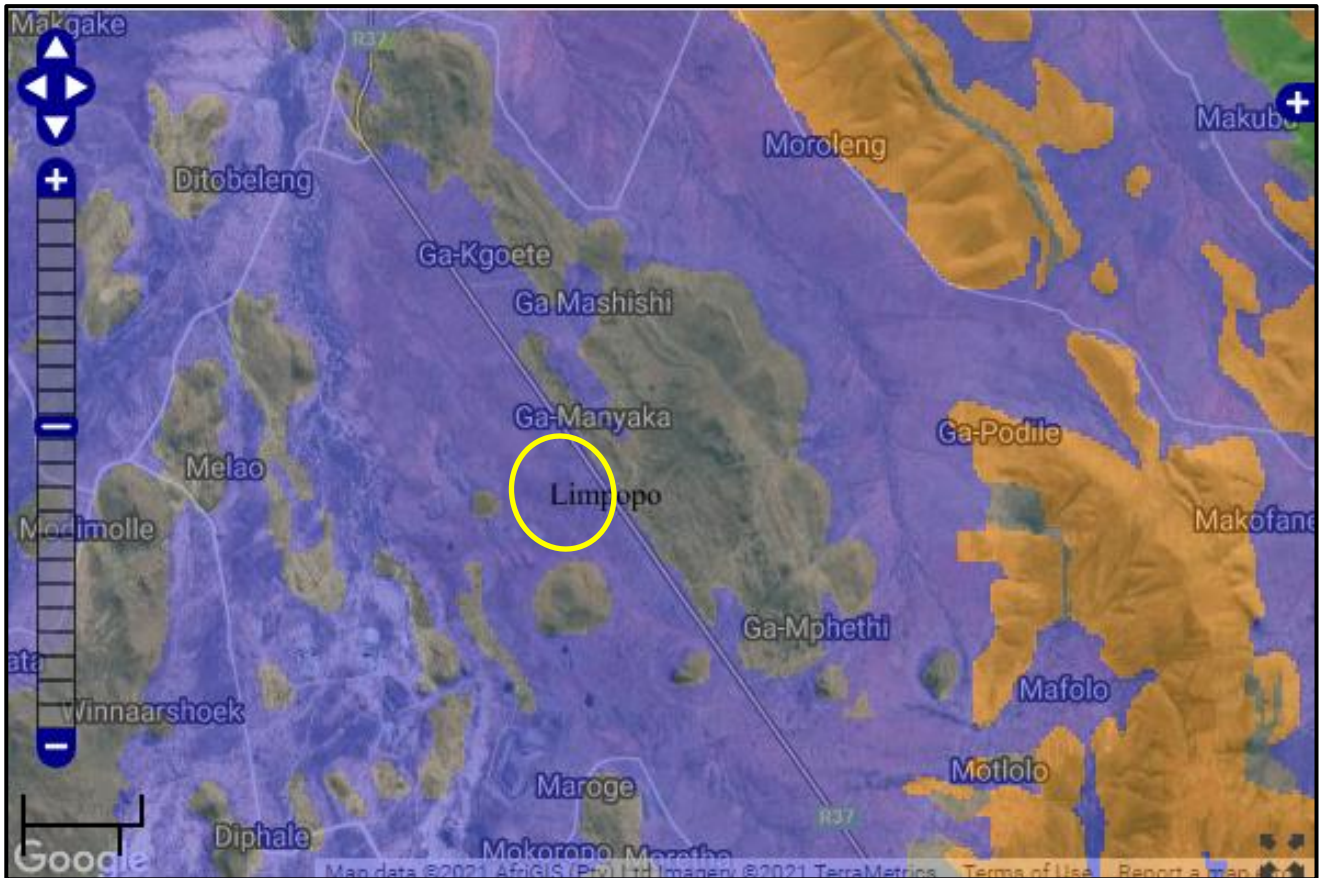
Figure 8.4. General site conditions at cemetery.



Figure 8.5. Fenced cemetery in relation to the proposed pipeline route.

8.1 Paleontological Heritage

Based on the SAHRA Paleontological map the study area is of insignificant and low sensitivity and no further studies are required in this regard (Figure 8.6).



Colour	Sensitivity	Required Action
RED	VERY HIGH	Field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	Desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	Desktop study is required
BLUE	LOW	No palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	No palaeontological studies are required
WHITE/CLEAR	UNKNOWN	These areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map

Figure 8.6. Paleontological sensitivity of the study area as indicated on the SAHRA Palaeontological sensitivity map.

9 Potential Impact

The study identified a large municipal cemetery adjacent to the proposed outlet pipeline to be constructed along the existing LWUA pipeline (Figure 8.1). There is no alternative to re-route the pipeline because of the built-up nature of the area, furthermore the proposed pipeline will follow the existing bulk water pipeline that have already impacted on possible subsurface features. Graves and cemeteries are of high social significance, but the cemetery will be avoided and preserved, and therefore no direct impact is expected (Table 7). Any additional effects to subsurface heritage resources can be successfully mitigated by implementing a chance find procedure. Mitigation measures as recommended in this report should be implemented during all phases of the project. Impacts of the project on heritage resources is expected to be low during all phases of the development (Table 7 and Figure 9.1).

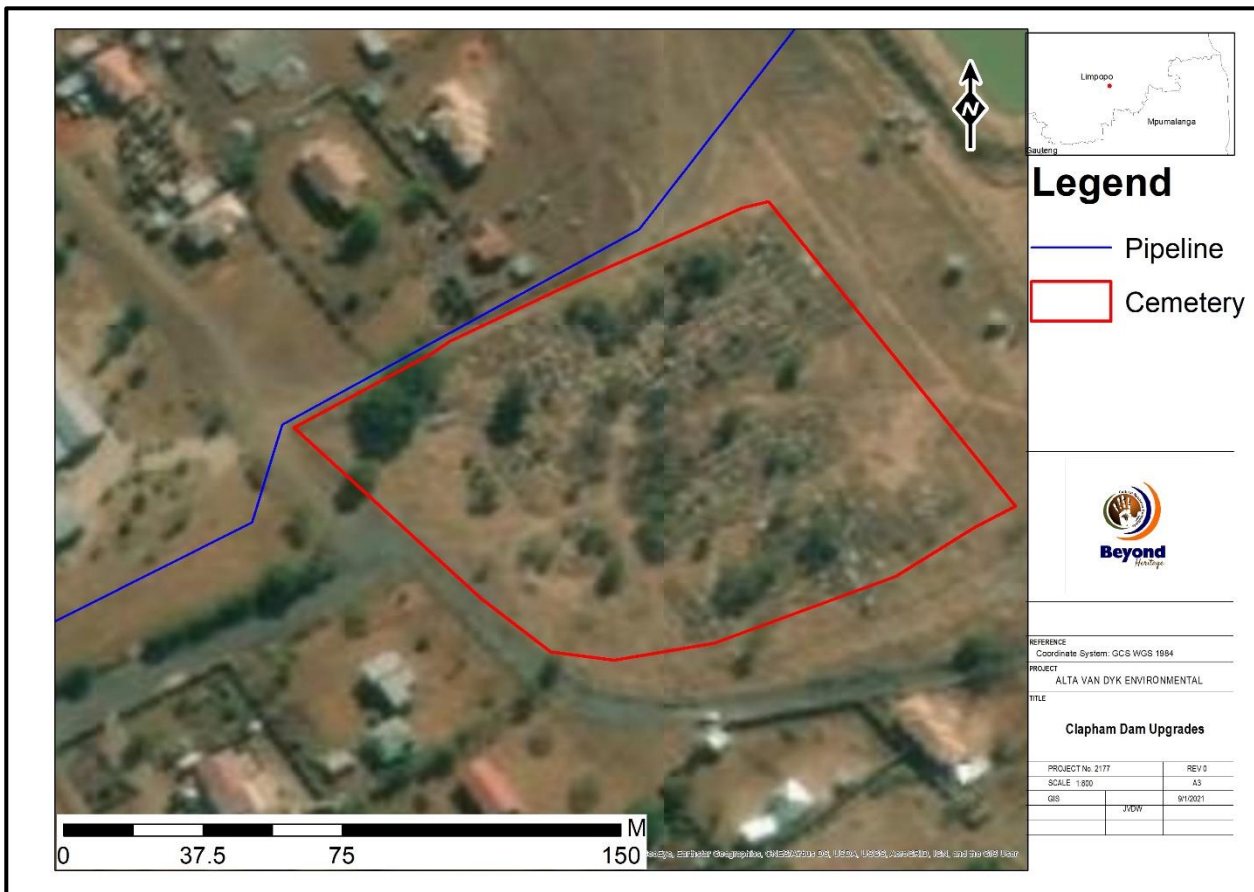


Figure 9.1. Cemetery in relation to the proposed project.

9.1.1 Pre-Construction phase

It is assumed that the pre-construction phase involves the removal of topsoil and vegetation as well as the establishment of infrastructure. These activities can have a negative and irreversible impact on heritage features if any occur. Impacts include destruction or partial destruction of non-renewable heritage resources.

9.1.2 Construction Phase

During this phase, the impacts and effects are similar in nature but more extensive than the pre-construction phase. Potential impacts include destruction or partial destruction of non-renewable heritage resources.

9.1.3 Operation Phase

No impacts are expected during the operation phase.

9.1.4 Impact Assessment for the Project

Table 7. Impact assessment of the proposed project.

POTENTIAL ENVIRONMENTAL IMPACT	ACTIVITY	ENVIRONMENTAL SIGNIFICANCE BEFORE MITIGATION								Cumulative	Status	RECOMMENDED MEASURES/ REMARKS	ENVIRONMENTAL SIGNIFICANCE AFTER MITIGATION							
		M	D	S	I	R	P	TOTAL	SP				M	D	S	I	R	P	TOTAL	SP
Cultural Heritage Impact Assessment																				
Graves and Cemeteries	Construction of the pipeline.	4	5	3	5	5	1	22	L	Low	Negative	<ul style="list-style-type: none"> The recorded cemetery should be indicated on development plans and avoided. Ensuring access to the cemetery during construction. Implementation of a chance find procedure for the project. 	4	5	3	0	0	1	12	L

10 Conclusion and recommendations

The proposed upgrades to the Clapham Storage Dam are required as several developments have taken place around the dam and LWUA wishes to take precautionary measures should the dam overflow. The purpose of the upgrades will ensure that if the dam overflows, water is handled in a controlled and safe manner to prevent damage to private property and ensure the safety of human lives.

The impact of the proposed upgrades is therefore limited to existing infrastructure (i.e., Clapham Storage Dam, scour outlet pipes and outlet pipeline). The latter being a new proposed pipeline linking the Clapham Storage Dam with the Matadi River following the existing bulk water pipeline and an informal gravel road. The adjacent area is a mostly built-up consisting of yards, stands, roads, houses and a school

These developments altered the study area and finds were limited to an existing, fenced municipal cemetery (co-ordinates -24.4816612, 30.119235) located adjacent to the outlet pipeline to be constructed along the existing LWUA pipeline (Figure 8.1). There is no alternative to re-route the pipeline because of the built-up nature of the area, furthermore the proposed pipeline will follow the existing bulk water pipeline that have already impacted on possible subsurface features. The cemetery is fenced and construction activities relating to the pipeline cannot encroach into the cemetery limiting impacts to the cemetery.

The impact of the proposed project on heritage resources can be mitigated to an acceptable level and it is recommended that the proposed project can commence on the condition that the following recommendations are implemented as part of the EMPr, based on approval from SAHRA:

10.1 Recommendations for condition of authorisation

The following recommendations for Environmental Authorisation apply and the project may only proceed based on approval from SAHRA:

Recommendations:

- Implementation of a chance find procedure for the project in the EMP'r as outlined below;
- The existing fenced in municipal cemetery adjacent to the outlet pipeline must be indicated on development plans and avoided. Care must be taken to ensure that access to the cemetery is not restricted for family members during the construction phase.

10.2 Chance Find Procedures

10.2.1 Heritage Resources

The possibility of the occurrence of subsurface finds cannot be excluded. Therefore, if during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped, and a qualified archaeologist must be contacted for an assessment of the find and therefore chance find procedures should be put in place as part of the EMP. A short summary of chance find procedures is discussed below.

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.
- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.
- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

10.3 Reasoned Opinion

The overall impact of the project is considered to be low and residual impacts can be managed to an acceptable level through implementation of the recommendations made in this report. The socio-economic benefits also outweigh the possible impacts of the development if the correct mitigation measures are implemented for the project.

10.4 Potential risk

Potential risks to the proposed project are the occurrence of intangible features and unrecorded cultural resources (of which graves are the highest risk). This can cause delays during construction, as well as additional costs involved in mitigation, as well as additional layout changes.

10.5 Monitoring Requirements

Ideally, site monitoring should be conducted by an experienced archaeologist or heritage specialist. Day to day monitoring can be conducted by the Environmental Control Officers (ECO). The ECO or other responsible persons should be trained along the following lines:

- *Induction training:* Responsible staff identified by the developer should attend a short course on heritage management and identification of heritage resources.
- *Site monitoring and watching brief:* As most heritage resources occur below surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are the initial soil removal and subsequent earthworks during construction. The ECO should monitor all such activities daily. If any heritage resources are found, the chance finds procedure must be followed as outlined above.

Monitoring requirements is outlined in Table 8.

Table 8. Heritage monitoring for the project

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
Clearing activities and construction	Entire project area	ECO	Weekly (Pre construction and construction phase)	Proactively	<ul style="list-style-type: none"> • If risks are manifested (accidental discovery of heritage resources) the chance find procedure should be implemented: <ol style="list-style-type: none"> 1. Cease all works immediately; 2. Report incident to the Sustainability Manager; 3. Contact an archaeologist/ palaeontologist to inspect the site; 4. Report incident to the competent authority; and 5. Employ reasonable mitigation measures in accordance with the requirements of the relevant authorities.

Heritage Monitoring					
Aspect	Area	Responsible for monitoring and measuring	Frequency	Proactive or reactive measurement	Method
					<ul style="list-style-type: none"> • Only recommence operations once impacts have been mitigated.
Clearing activities and construction	Area along the municipal cemetery	ECO	Weekly (Preconstruction and construction phase)	Proactively	<ul style="list-style-type: none"> • Ensure no encroaching occurs at the cemetery; • Measure levels of change and compare with recorded baseline conditions; • Status quo will be recorded through photographs; and; • Results will be reported in the progress reporting.

10.6 Management Measures for inclusion in the EMPr

Table 9. Heritage Management Plan for EMPr implementation

Area	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Target	Performance indicators (monitoring tool)
Municipal Cemetery	<ul style="list-style-type: none"> ✓ All recorded graves and burial sites should be indicated on development plans and avoided. ✓ Ensure access to the sites for families during construction. ✓ Monitor construction to ensure no encroaching occurs at the cemetery. 	Pre-Construction and construction	Pre-Construction and construction	Applicant & EAP	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 36 of NHRA	ECO Checklist/Report
General project area	Implement chance find procedures in case possible heritage finds are uncovered	Pre Construction and construction	Throughout the project	Applicant EAP	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 35, 36 and 38 of NHRA	ECO Checklist/Report

10.7 Knowledge Gaps

Due to the subsurface nature of heritage resources, the possibility of discovery of heritage resources during the construction phase cannot be excluded. This limitation is successfully mitigated with the implementation of a chance find procedure.

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