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Eskom

BURIAL GROUND DEMARCATION SPECIALIST REPORT FOR THE PROPOSED REITZ-PETSANA POWER LINE IN PETSANA AREA WITHIN THE JURISDICTION OF NKETOANA MUNICIPALITY OF THABO MOFUTSANYANE DISTRICT IN FREE STATE PROVINCE

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December, 2022

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DECLARATION

ABILITY TO CONDUCT THE PROJECT

Alvord Nhundu is a professional archaeologist. He completed his Bachelor of Science with Honours degree in archaeology with the University of the Witwatersrand (Wits) and Masters in Archaeology with the University of Pretoria (UP). His research interest lies in old and new world archaeology, palaeoenvironmental and climatology, archaeological theory, Later Stone Age, rock art, hunter-gatherers, hunter-gatherer interactions, several aspects of southern African Iron Age and Indigenous archaeologies. Alvord is an accredited Cultural Resource Management (CRM) member of the Association of southern African Professional Archaeologists (ASAPA #338). He is also affiliated to Society of South Africanist Archaeologists (SAfA) and the International Council of Archaeozoology (ICAZ). He has been practising CRM for more than 10 years, and has completed over 100 Archaeological Impact Assessments (AIA) for developmental projects in the Limpopo, Mpumalanga, North-West, Eastern Cape, Free State and KwaZulu Natal provinces of South Africa. The projects include establishment and upgrade of power substations, road construction, and establishment and expansion of mines. He has also conducted the relocation of graves. His detailed CV is available on request

Munyadziwa Magoma is a professional archaeologist, having obtained his BA degree in Archaeology and Anthropology at University of South Africa (UNISA), an Honours degree at the University of Venda (UNIVEN), and a Master's degree at the University of Pretoria (UP). He is an accredited Cultural Resource Management (CRM) member of the Association for southern African Professional Archaeologists (ASAPA) and Amafa aKwaZulu-Natali. Munyadziwa is further affiliated to the South African Archaeological Society (SAAS), the Society of Africanist Archaeologists (SAfA), Historical Association of South Africa (HESA); Anthropology Southern Africa (ASnA); International Association for Impact Assessment (IAIAsa); International Council on Monuments and Sites (ICOMOS) and the International Council of Archaeozoology (ICAZ). He has more than fifteen years' experience in heritage management, having worked for different CRM organisations and government heritage authorities. As a CRM specialist, Munyadziwa has completed well over 1000 hundred Archaeological Impact Assessments (AIA) for developmental projects situated in several provinces of the Republic of South Africa. The AIAs projects he has been involved with are diverse, and include the establishment of major substation, upgrade and establishment of roads, establishment and extension of mines. In addition, he has also conducted Heritage Impact Assessments (HIAs) for the alteration to heritage buildings and the relocation of graves. His detailed CV is available on request.

We declare that this report has been prepared independently of any influence as may be specified by all relevant departments, institutions and organisations. We act as the independent specialists in this application, and 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. We declare that there are no circumstances that may compromise our objectivity in performing such work. We vow to comply with all relevant Acts, Regulations and applicable legislation.

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Acknowledgements

The author and the team of Vhubvo Consultancy Cc would like to acknowledge community members, Eskom officials for their assistance in relation to the conduction of this project, also Google Earth and Wikipedia.

Executive Summary

Introduction

At the request of Eskom, Vhubvo Consultancy Cc conducted a burial ground demarcation specialist report for the proposed Reitz-Petsana power line in Petsana area within the jurisdiction of Nketoana Municipality of Thabo Mofutsanyane District in Free State Province. This assessment is a specialist component which is aimed at investigating the demarcation of a grave site. The study aims to advise on demarcation of a burial ground in relation to the proposed power line in line with the National Heritage Resources Act, 1999 (Act 25 of 1999). To reach a defensible recommendation, both desktop study and field survey were conducted.

Receiving Environment

The proposed development is located on an area whose topography is characterised by even plain with elements such as access roads and residential stands throughout the proposed area. Although transformed, the area yielded a burial ground from which the proposed power line will transvers (see Figures 1 - 3).

Restrictions and Assumptions

The proposed site is highly disturbed by the residential development, and existing power lines. Chances of finding any grave resources on the surface of the area proposed for construction is low. All graves are within a demarcated area. This does not however rule out chance find. See Appendix I on how to attend to chance finds.

Survey Findings and Discussions

The main aim of the survey was to understand the Burial Ground and its related buffer zone. In South Africa and elsewhere, burial grounds are considered to be of high significance and are protected by various laws. Legislature with regard to graves includes Section 36 of the National Heritage Resources Act (Act No 25 of 1999) whenever graves are older than sixty years, and the Human Tissues Act (No 65 of 1983 as amended), whenever graves are younger than sixty years. Other legislation with regard to graves includes those which apply when graves are exhumed and relocated, namely the Ordinance on Exhumations (No 12 of 1980).

- **Burial Ground**

  The burial ground will not be directly affected by the proposed electrification project as the Pylon Power No. RMP2-18 and RMP2-19 are both located at safe distances from the Burial Ground. RMP2-18 and RMP2-19 are located more than 25m and 70m respectively. Minimal monitoring by the Environmental Officer is needed for construction around Pylon Power RMP2-18 and RMP2-19. The significance of any possible impact on the burial grounds are fairly medium without mitigation, and low with mitigation (monitoring).

Recommendations and Discussions

Recommendations are given from a heritage point of view and considering the nature of the proposed project and the cultural significance of the heritage resources in the vicinity of the proposed area. The following are the recommendations based on the above findings:

- Ensuring that the descendants (community members in this instance) of the graves are sought, and notified about this proposed construction which may have an impact (directly or indirectly) on their grave (s). This can be done by means of placing of placard(s) in the village, or through liaising with the ward-councilor/ and or traditional leader;
- Aspects related to dumping of construction material within this buffer zone and stone robbing or removal of any material should be addressed, and discourage; and
- Labor-intensive workers should be notified about these graveyards, and the developer should avoid conveying duty during the time when the graveyard is active (that's mostly Saturday morning).

Eskom is reminded that should any archaeological material be unearthed accidentally during the course of construction (e. g. excavation), SAHRA should be alerted immediately and construction activities be stopped within a radius of at least 10m of such indicator. The area should then be demarcated by a danger tape. Accordingly, a professional archaeologist or SAHRA officer should be contacted immediately. In the meantime, it is the responsibility of the Environmental Officer and the contractor to protect the site from publicity (i.e., media) until a mutual agreement is reached. It is mandatory to report any incident of human remains encountered to the South African Police Services, SAHRA staff member and professional archaeologist. Any measure to cover up the suspected archaeological material or to collect any resources is illegal and punishable by law under Section 35(4) and 36(3) of the National Heritage Resources Act, Act 25 of 1999. The developer must induct field workers about archaeology, and steps that should be taken in the case of exposing archaeological materials.

Pre-construction education and awareness training Prior to construction, contractors should be given training on how to identify and protect archaeological remains that may be discovered during the project. The pre-construction training should include some limited site recognition training for the types of archaeological sites that may occur in the construction areas. Below are some of the indicators of archaeological site that may be found during construction:

- Flaked stone tools, bone tools and loose pieces of flaked stone;
- Ash and charcoal;
- Bones and shell fragments;
- Artefacts (e.g., beads or hearths); and
- Packed stones which might be uncounted underground, and might indicate a grave or collapse stone walling

Conclusions

The co-ordinates of the graves were captured and recorded, the content of such is included in the report. It is thus recommended that SAHRA allows the project to proceed subject to the recommendations given above.

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Acronyms and Abbreviations

AIA	Archaeological Impact Assessment
EMP	Environmental Management Plan
HIA	Heritage Impact Assessment
LIA	Late Iron Age
MIA	Middle Iron Age
EIA	Early Iron Age
HMP	Heritage Management Plan
LSA	Late Stone Age
MSA	Middle Stone Age
ESA	Early Stone Age
NASA	National Archives of South Africa
NHRA	National Heritage Resources Act
SAHRA	South African Heritage Resources Agency

Glossary of Terms

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

Archaeological Material: remains resulting from human activities, which are in a state of disuse and are in, or on, land and which are older than 100 years, including artifacts, human and hominid remains, and artificial features and structures.

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

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

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

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

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

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

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

Compatible use: means a use, which respects the cultural significance of a place. Such a use involves no, or minimal, impact on cultural significance.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. Introduction

Eskom requested Vhubvo Consultancy Cc to conduct a burial ground demarcation specialist report for the proposed Reitz-Petsana power line in Petsana area within the jurisdiction of Nketoana municipality of Thabo Mofutsanyane district in Free State Province. This assessment is a specialist component which is aimed at investigating the demarcation of a grave site. The study aims to advise on demarcation of a grave site in relation to the proposed power line in line with the National Heritage Resources Act, 1999 (Act 25 of 1999). The survey for the demarcation was conducted in accordance with the SAHRA Minimum Standards for Archaeology and Palaeontology which clearly specify the required contents of reports of this nature.

2. Sites Location and Description

The proposed development is located on an area whose topography is characterised by even plain with elements such as access roads and residential stands throughout the proposed area. Although transformed, the area yielded an active burial ground from which the proposed power line will transvers (see Figures 2 - 5). The graveyard is consisted of variety of graves, ranging from different periods. The fence of the grave site is in a considerable depraved state. Hence, a need of this report.

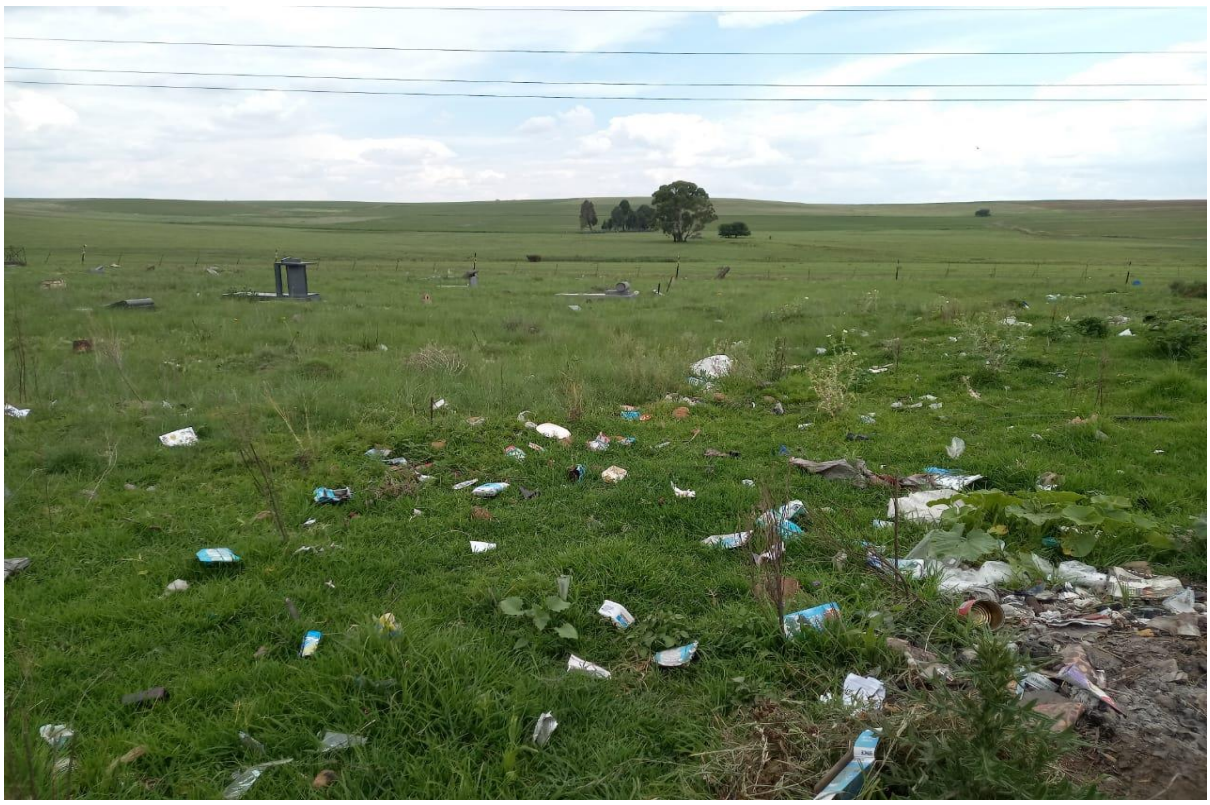

Figure 1: An overview of the burial ground.

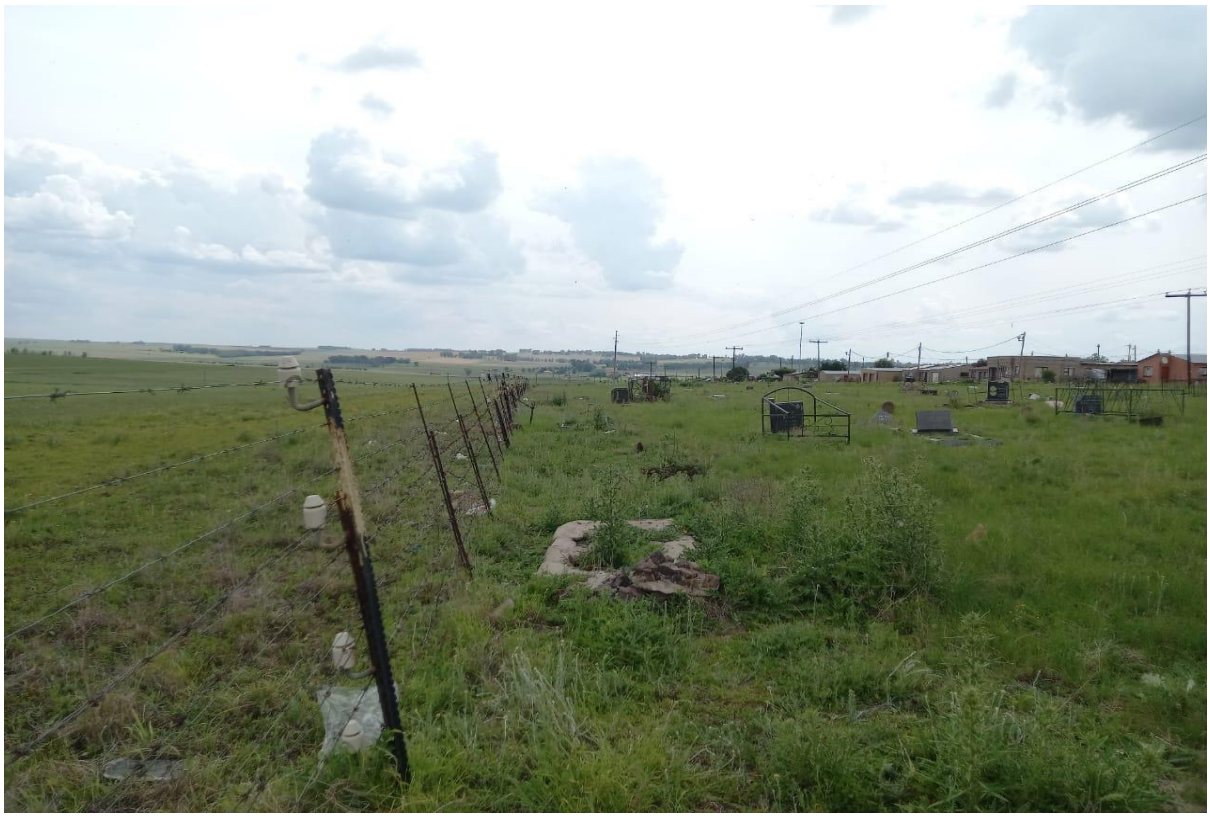

Figure 2: View of the fence that currently demarcate the burial ground.

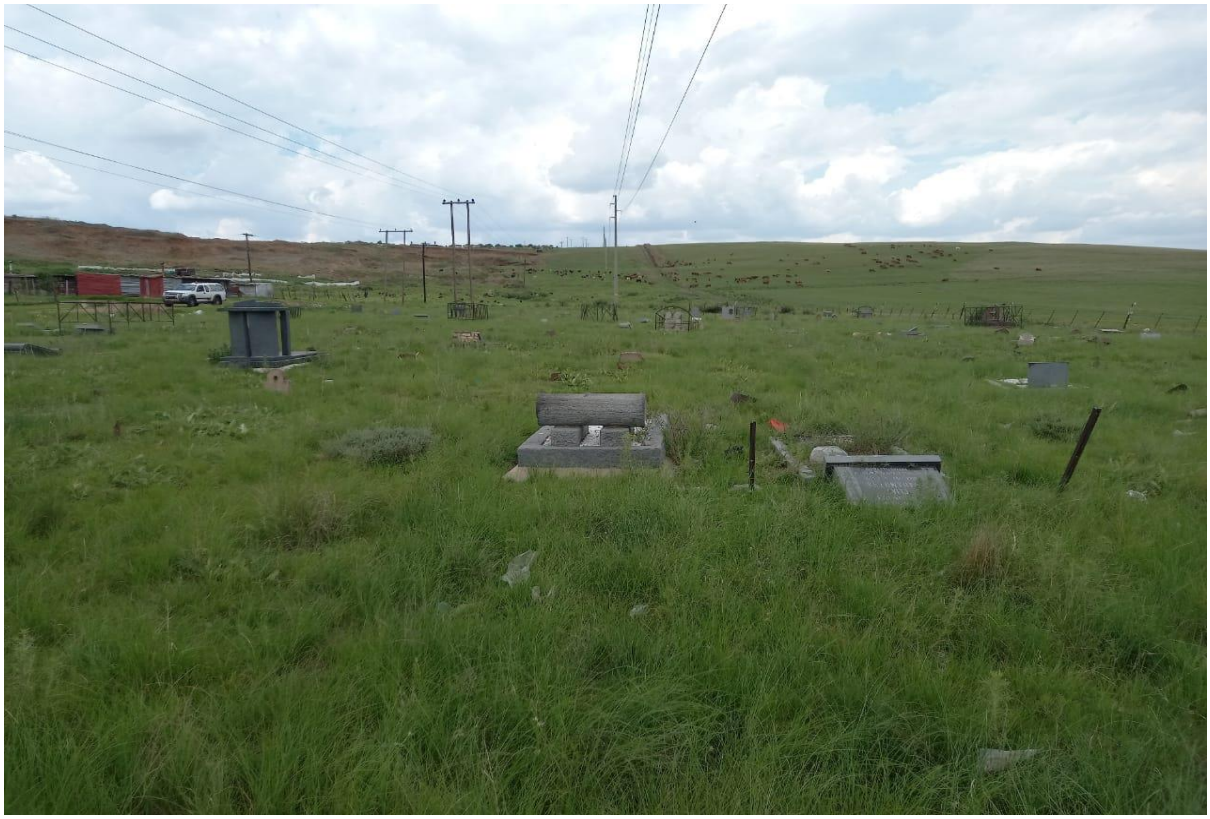

Figure 3: View of the existing power line in conjunction to the burial ground.

3. Purpose of the Cultural Heritage Study

The purpose of this study is to entirely identify and document the burial ground that may be affected by the proposed electrification, this will, in turn, assist the developer in ensuring proper conservation measure in line with the National Heritage Resource Act, 1999 (Act 25 of 1999). Impact assessments highlight many issues facing sites in terms of their management, conservation, monitoring and maintenance, and the environment in and around the site.

4. Methodology

The methodological approach is informed by the 2012 SAHRA Policy Guidelines for impact assessment. As part of this study, the following tasks were conducted, literature review, completion of a field survey; and documentations and analysis of the acquired data, leading to the production of this report.

5. Applicable Heritage Legislation

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

- **The National Heritage Resources Act**

According to the above-mentioned law the following is protected as cultural heritage resources:

- Archaeological artifacts;
- Ethnographic art objects (e.g., prehistoric rock art) and ethnography;
- Objects of decorative and visual arts;
- Military objects;
- Structures and sites older than 60 years;
- Historical objects;
- Proclaimed heritage sites;
- Graveyards and graves older than 60 years;
- Meteorites and fossils; and
- Objects, structures and sites of scientific or technological value.

Archaeology, Palaeontology and Meteorites

Section 35(4) of this act states that no person may, without a permit issued by the responsible heritage resources authority:

- Destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
- Destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
- Trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or
- Bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment that assists in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites; and
- Alter or demolish any structure or part of a structure which is older than 60 years as protected.

The above mentioned may only be disturbed or moved by an archaeologist, after receiving a permit from the Eastern Cape Provincial Heritage Resource Authority.

Human remains

In terms of Section 36(3) of the National Heritage Resources Act, no person may, without a permit issued by the relevant heritage resources authority:

- Destroy, damage, alter, exhume or remove from its original position of otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;
- Destroy, damage, alter, exhume or 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
- Bring onto or use at a burial ground or grave referred to above any excavation, or any equipment which assists in the detection or recovery of metals.

6. Degree of Significance

This category requires a broad, but detailed knowledge of the various disciplines that might be involved. Large sites, for example, may not be very important, but a small site, on the other hand, may have great significance, as it is unique to the region. The following table is used to grade heritage resources.

Table 1: Grading systems for identified heritage resources in terms of National Heritage Resources Act (Act 25 of 1999).

Level	Significance	Possible action
National (Grade I)	Site of National Value	Nominated to be declared by SAHRA
Provincial (Grade II)	Site of Provincial Value	Nominated to be declared by PHRA
Local Grade (IIIA)	Site of High Value Locally	Retained as heritage
Local Grade (IIIB)	Site of High Value Locally	Mitigated and part retained as heritage
General Protected Area A	Site of High to Medium	Mitigation necessary before destruction
General Protected Area B	Medium Value	Recording before destruction
General Protected Area C	Low Value	No action required before destruction

Significance rating of sites

(i) High (ii) Medium (iii) Low

This category relates to the actual artefact or site in terms of its actual value as it is found today, and refers more specifically to the condition that the item is in. For example, an archaeological site may be the only one of its kind in the region, thus its regional significance is high, but there is heavy erosion of the greater part of the site, therefore its significance rating would be medium to low. Generally speaking, the following are guidelines for the nature of the mitigation that must take place as Phase 2 of the project.

High

- This is a 'do not touch' situation, alternative must be sought for the project, examples would be natural and cultural landscapes like the Mapungubwe Cultural Landscape World Heritage Site, or the house in which John Langalibalele resided.
- Certain sites, or features may be exceptionally important, but do not warrant leaving entirely alone. In such cases, detailed mapping of the site and all its features is imperative, as is the collection of diagnostic artefactual material on the surface of the site. Extensive excavations must be done to retrieve as much information as possible before destruction. Such excavations might cover more than half the site and would be mandatory; it would

also be advisable to negotiate with the client to see what mutual agreement in writing could be reached, whereby part of the site is left for future research.

Medium

- Sites of medium significance require detailed mapping of all the features and the collection of diagnostic artefactual material from the surface of the site. A series of test trenches and test pits should be excavated to retrieve basic information before destruction.

Low

- These sites require minimum or no mitigation. Minimum mitigation recommended could be a collection of all surface materials and/ or detailed site mapping and documentation. No excavations would be considered to be necessary.

In all the above scenarios, permits will be required from the South African Heritage Resources Agency (SAHRA) or the appropriate PHRA as per the legislation (the National Heritage Resources Act, no. 25 of 1999). Destruction of any heritage site may only take place when the appropriate heritage authority has issued a permit. The following table is used to determine the rating system on the receiving environment.

7. Findings and Discussions

The main aim of the survey was to understand the grave site and its related buffer zone. In South Africa and elsewhere, burial grounds are considered to be of high significance and are protected by various laws. Legislature with regard to graves includes Section 36 of the National Heritage Resources Act (Act No 25 of 1999) whenever graves are older than sixty years, and the Human Tissues Act (No 65 of 1983 as amended), whenever graves are younger than sixty years. Other legislation with regard to graves includes those which apply when graves are exhumed and relocated, namely the Ordinance on Exhumations (No 12 of 1980). The noted burial ground includes all types of graves as indicate above. Nevertheless, note must be taken that the burial ground will not be directly affected by the proposed electrification project as the Pylon Power No. RMP2-18 and RMP2-19 are both located at safe distances from the burial ground. RMP2-18 and RMP2-19 are located more than 25m and 70m respectively. Minimal monitoring by the Environmental Officer is proposed for construction around Pylon Power RMP2-18 and RMP2-19 as the burial grounds is far away from the area proposed for electrification, and the significance of any possible impact on the burial grounds are fairly medium without mitigation, and low with mitigation (monitoring).

Table 2: Resources found in the area.

Site Name	Gps of the four corner of the Burial Site	Descriptions	Threats	Mitigation
Burial Ground	S27 48 33.85 E28 27 16.95 S27 48 32.44 E28 27 16.25 S27 48 32.79 E28 27 18.56 S27 48 31.87 E28 27 18.60	An existing burial ground with several grave site. The burial ground is located at safe distances from the proposed new Pylon. RMP2-18 and RMP2-19 are located more than 25m and 70m respectively **Significance:** High	Possibility of threat from construction workers. **With Magnitude:** Low	Monitoring by the EO

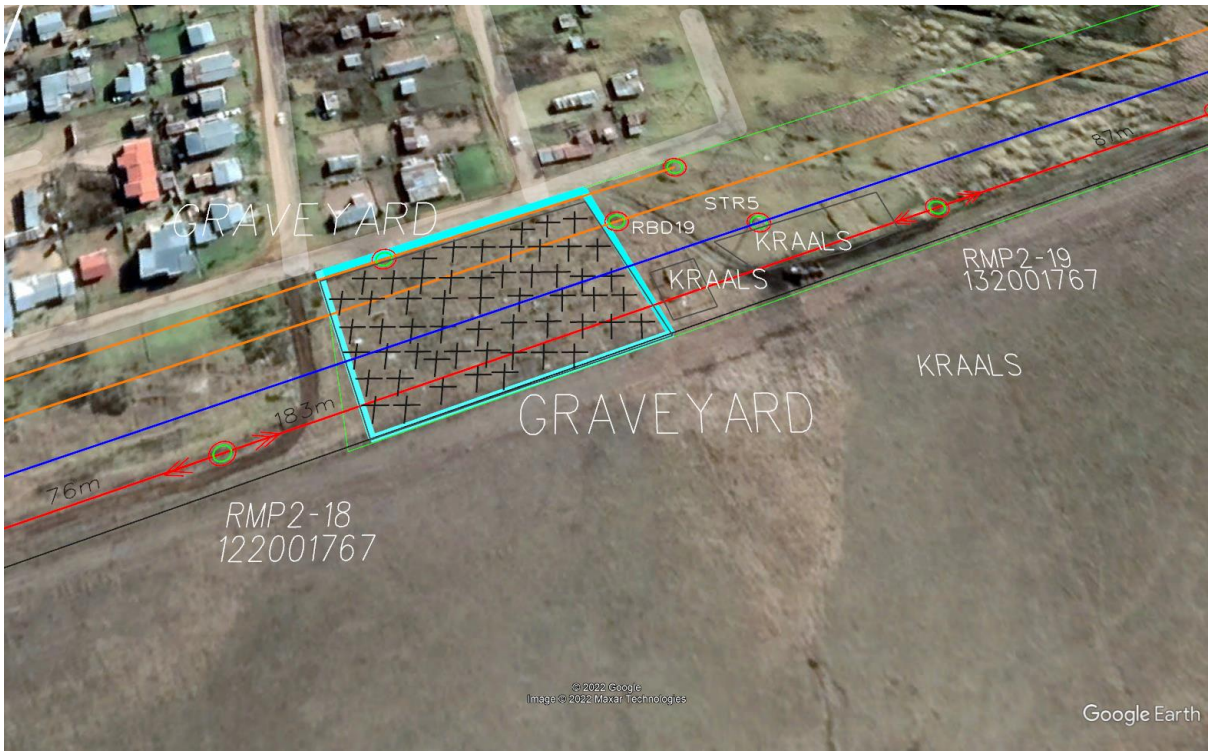

Figure 4: An overview of the grave site in conjunction to the line.

8. Recommendations and Discussions

Recommendations are given from a heritage point of view and considering the nature of the proposed project and the cultural significance of the heritage resources in the vicinity of the proposed area. The following are the recommendations based on the above findings:

- Ensuring that the descendants (community members in this instance) of the graves are sought, and notified about this proposed construction which may have an impact (directly or indirectly) on their grave (s). This can be done by means of placing of placard(s) in the village, or through liaising with the ward-councilor/ and or traditional leader;
- Aspects related to dumping of construction material within this buffer zone and stone robbing or removal of any material should be addressed, and discourage; and
- Labor-intensive workers should be notified about these graveyards, and the developer should avoid conveying duty during the time when the graveyard is active (that's mostly Saturday morning).

Eskom is reminded that should any archaeological material be unearthed accidentally during the course of construction (e. g. excavation), SAHRA should be alerted immediately and construction activities be stopped within a radius of at least 10m of such indicator. The area should then be demarcated by a danger tape. Accordingly, a professional archaeologist or SAHRA officer should be contacted immediately. In the meantime, it is the responsibility of the Environmental Officer and the contractor to protect the site from publicity (i.e., media) until a mutual agreement is reached. It is mandatory to report any incident of human remains encountered to the South African Police Services, SAHRA staff member and professional archaeologist. Any measure to cover up the suspected archaeological material or to collect any resources is illegal and punishable by law under Section 35(4) and 36(3) of the National Heritage Resources Act, Act 25 of 1999. The developer must induct field workers about archaeology, and steps that should be taken in the case of exposing archaeological materials.

Pre-construction education and awareness training Prior to construction, contractors should be given training on how to identify and protect archaeological remains that may be discovered during the project. The pre-construction training should include some limited site recognition training for the types of archaeological sites that may occur in the construction areas. Below are some of the indicators of archaeological site that may be found during construction:

- Flaked stone tools, bone tools and loose pieces of flaked stone;
- Ash and charcoal;
- Bones and shell fragments;
- Artefacts (e.g., beads or hearths); and

- Packed stones which might be uncounted underground, and might indicate a grave or collapse stone walling

Conclusions

The co-ordinates of the graves were captured and recorded (see Table 2). It is thus recommended that SAHRA allows the project to proceed subject to the recommendations given above.

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Appendix I: Chance Find Procedure

Introduction

The purpose of this document is to provide Eskom and their contractors with the appropriate response guidelines (extracted and adapted from the National Heritage Resources Act (Act No. 25 of 1999) Regulations Reg No. 6820, GN: 548, taking into consideration international best practice based on World Bank, Equator Principles and the International Finance Corporation Performance Standards, 1972 UNESCO Convention on the Protection of World Cultural and Natural Heritage (World Heritage Convention), that should be implemented in the event of chance discovery of heritage resources. These guidelines or chance find procedures (CFPs) can be incorporated into Eskom's policies that may have relevance during construction and operational phases. The CFPs aim to avoid and/or reduce project risks that may result due to chance finds, whilst considering international best practice.

Purpose of ACFP

The aim of this Archaeological Chance Find Procedure (ACFP) are to protect previously unexposed heritage resources that are yet unknown although might be encountered during the project operation or construction phase. This document serves to provide best practices to manage accidental exposed heritage resource during the development. The procedures are given to the client/applicant/contracts in order to prevent and minimize negative impact on heritage resources encountered by accident. Thus, the heritage specialist(s) compiled this chance find document with a purpose to give instructions based on relevant and appropriate actions in line with the NHRA and best guidelines to protect the chance finds on the proposed site. In significant, the ACFP stand in place to promote the preservation of heritage resources and present mitigation measure to avoid disturbance on heritage resources.

ACFP for Heritage Resources

The following procedures must be followed when heritage resources are encountered during the operational or construction phase:

- All construction/clearance activities in the vicinity of the heritage resources found by accident on site must cease immediately to avoid further damage to the chance finds
- Immediately report the chance finds to the supervisor/site manager or if they are unavailable, report to the project Environmental Officer (EO) who will provide further instructions.
- Record (note taking, photograph with a scale, GPS coordinates) of all the chance find exposed during the activity.
- All remains are to be stabilised in situ.
- Secure (e.g., barricade) the area to prevent further disturbance on heritage resources.
- The EO must contact the qualified archaeologist registered with the association for Association for Southern African Professional Archaeologist (ASAPA) or South African Heritage Resources Agency (SAHRA).
- The project archaeologist will conduct the inspection and assess the significance of the chance finds under SAHRA guidelines, give recommendation and mitigation measures.