

**HERITAGE INPUT REPORT ON THE EXISTING GRANITE QUARRY ON THE REMAINDER
OF PORTION 5 OF THE FARM SCHAAPKRAAL 292JQ, DISTRICT OF RUSTENBURG,
NORTHWEST PROVINCE, SOUTH AFRICA**

GRAVE IDENTIFICATION AND VERIFICATION ASSESSMENT

DATE:11 MAY 2022

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Conducted on behalf of:



**Compiled by:
REACH ARCHAEOLOGY CONSULTING**

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Note that all location information, geographic co-ordinate information, site-specific geodata, and site-specific co-ordinate data and details presented in this report were obtained using a hand-held Garmin Global Positioning (Garmin Series Wearable) and/or associated software device. The manufacturer indicates the accuracy reading to be within +/-5m.

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Ethical Considerations

Reach Archaeology Consulting (Pty) Ltd promotes and advocates for the conservation, protection, and preservation of sensitive cultural heritage resources ethically and morally conscious. We support the adherence to all local legislation, ordinance and policies as well as all best practice methodological approaches in the mitigation of cultural resources.

Reach Archaeology Consulting (Pty) Ltd, upholds the Minimum Standards regarding the compilation of Archaeological and Palaeontological components of Impact Assessments as set out by the South African Heritage Resources (SAHRA) and the Cultural Resources Management (CRM) division of the National Association for the South African Profession Archaeologists (ASAPA)

Expertise: Ms AM Matabane

Specialist Expertise

Ms Annlin Mantshebi Matabane, MA. (Archaeology), BA Hons (Archaeology), BA (Archaeology and Physical Geography) (Univ. of Pretoria). ASAPA (Professional member) with more than eight years of experience in the compilation of archaeological and heritage impact assessments and cultural heritage resources management.

Ms Matabane is an accredited member of the Association for Southern African Professional Archaeologists (ASAPA Mem No 429) in good standing, with heritage compliance experience from Amafa a-KwaZulu Natali Provincial Heritage Resources Agency (AMAFA)/ Research Institute as well as the South African Heritage Resources Agency (SAHRA).

Ms Matabane has reviewed and conducted AIA/HIA's and fieldwork assessments, Section 36, 35 and 38 permit specialist historical studies, heritage mitigation work archival and historical research, legislation policy reviews and policy implementation.

Ms Matabane has completed projects varying from Phase 1 and Phase 2 cultural heritage impact assessments as well as heritage management government institutions, repatriation and memorialisation projects, and several private companies and grave relocations for several small and large scale farms and mines across South Africa.

Due to POPIA Act, separate specialist curriculum vitae (including qualifications and certificates) are only available upon written request*

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Signed: _____

Date: 11 May 2022

Report Reviewer by: **M Moremoholo**
Field Archaeologist

SPECIALIST DECLARATION

The author of this report hereby formally declares:

- that I act in my capacity as an independent specialist
- all results and related data have been obtained through careful and precise execution of recognised methods of evaluation and are related to the scope of required investigations
- the opinions and interpretations are embraced through judgement, discernment and comprehension to the best of my available knowledge and are outside the scope of any accreditation.
- it performed the work relating to this project in an objective manner, notwithstanding the results, views and findings,
- it has expertise in conducting the specialist report relevant to this project, including knowledge of the framework, protocol, legislation, regulations and strategies,
- it has no, and will not engage in, conflicting interests in the undertaking of the activity,
- it undertakes to disclose to the client and authorities all material information it possesses that reasonably has or may have the potential of objectivity influencing any decision based on the results and findings of this project.
- all the particulars furnished by *Reach Archaeology Consulting (Pty) Ltd* in this report are 'true and correct, as far as possible, and any false declaration is a punishable offence.
- I have provided the competent authority with access to all information at my disposal, whether such information is favourable to the applicant or not; and
- I am aware that a false declaration is an offence in terms of regulation 71 of GN No. R. 543.

Signed: 
Ms AM Matabane

Date: 11 May 2022


Director: Reach Archaeology Consulting (Pty) Ltd
Specialist Archaeologist
Heritage Consultant
[ASAPA MEMBERSHIP No: 429]

TERMINOLOGY

- Archaeology- the study of past human cultures through human being's material culture remains
- Artefact- Entities whose characteristics result in or partially result from human activity. The shape and the other attributes of the artefact are not altered by the removal of the surroundings in which they are discovered. Examples of artefacts include potsherds, iron objects, lithics, beads, hut remains, shells etc.
- Assemblage- A group of artefacts recurring together at a particular time, space and place and representing the sum of human activities.
- Archaeological Material- artefacts are resulting from human agents who are in a state of disuse and are in, or on land, which are older than 100years, including artefacts, human and hominid remain, features, structures and sites.
- Conservation- means all the processes of looking instead after a place so as to retain its cultural significance
- Cultural Heritage Resources- refers to physical and cultural properties such as archaeological and palaeontological sites, historic and prehistoric places, buildings, structures and materials, cultural sites such as places of ritual or religious importance and their associated materials; burial sites or graves and their associated materials, geological or natural features of cultural significance or scientific significance. Cultural Heritage Resources also include intangible resources such as religious practices, ritual ceremonies, oral histories, memories and indigenous knowledge, structures, places, natural feature aesthetics and scientific architectural, religious, symbolic or traditional importance to specific individuals or groups, traditional systems of cultural practice, belief or social interaction.
- Cultural Significance- means aesthetic, historical, scientific, social or spiritual value for past, present or future generations. It also encompasses the complexities of what makes a place, materials or intangible resources of value to society or part of, customarily assessed in terms of aesthetic, historical, scientific/ research and social values.
- Ceramic Traditions- the cultural representation of ceramics, a series of ceramic units that constitutes ceramic tradition.
- Culture- is defined as the learned and shared commonalities that people have, do and think
- A cultural landscape- refers to a distinct geographic area with cultural significance
- Cultural Resources Management- a system of measures for safeguarding the archaeological heritage of a given area, generally applied within the framework of legislation to safeguard the past.
- Excavation: The method of data acquisition in archaeology involves the systematic unearthing of remains by removing lithospheric deposits of soil, stone and rock materials covering and accompanying it.
- Heritage- That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the NHRA Act 25 of 1999.
- Phase 1HIA Assessment is an in-depth investigation that identifies archaeological and heritage resources, sites, assets and objects, assessing their significance and comments on the impact of a given development on the sites. Recommendations for the site mitigation of conservation are also made in this phase.
- Site: A distinct spatial clustering of artefacts, objects, features, structures and organic environmental remains indicating human agency and activity. These include surface sites, caves and rock shelters, more significant open-air sites, sealed sites (deposits) and rover deposits.
- Stratigraphy- the principle examines and describes the observable layers of sediments and the arrangement of strata in deposits, usually detectable via transverse cross-section
- Stratified Sampling- a sampling strategy where a study area is subdivided into appropriate zones-often based on the probable location of the archaeological regions, after which each zone is sampled at random
- Systematic Sampling- a sampling strategy whereby a grid of sample blocks is set up over the survey area, and each of these blocks are equally spaced and searched
- Tradition- Artefact types, assemblages of tools, architectural styles, economic practices or art styles that last longer than a phase and even a horizon are described by the term tradition. A typical example of this is the early Iron Age tradition of Southern Africa.

- Impact- the positive or negative effects on human well-being and/ or the environment.
- In Situ-material culture and surrounding deposits in their original location and context,for example, an archaeological site that has not been disturbed by farming
- IA- Iron Age period is an archaeological term used to define a period associated with domesticated livestock and grains, metalworking and ceramic manufacture.
- I&AP-Interested and Affected Parties- *Interested and affected parties* are 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 suggestion or movement and its consequences.
- Mitigation- Anticipating and preventing adverse impacts and risks, then minimising them, rehabilitating or repairing them has implications to the extent feasible.
- Public participation process- means 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
- Palaeontology- Any fossilised remains or fossil traces of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or traces.
- GIS- Geographic Information systems are computer software that allows layering of various types of data to produce complex maps; useful for predicting site location and representing the analysis of collected data within and across regions.
- Management- actions associated with the proposed development that avoid, mitigate, restore, rehabilitate or compensate for the negative or adverse impacts and implications.
- Oral Histories- The historical narratives, stories and traditions passed from generation to generation by word of mouth
- Fossil- mineralised bone and/or organic material of animals, shellfish plants and marine life.

SOUTHERN AFRICAN GEOLOGICAL AND ARCHAEOLOGICAL TIMELINE AND MAJOR CULTURAL DEVELOPMENTS ^{*adapted}

GEOLOGICAL STAGE	TIME PERIOD (YEARS BP)	CULTURAL PERIOD	MAJOR EVENTS
 The Holocene	500	Historical Period	-European colonisation -Later farming societies, states, i.e. Mapungubwe, Great Zimbabwe, Kami, K2
	1000	Later Iron age	
	2500-2000	Early Iron Age (EIA)	Early farming communities- i.e. millet, regional pottery traditions, spread of iron metallurgy
	10000-12000	Terminal LSA	-spread of domestic animals, particularly cattle, sheep and goats
		LSA	-Microlithic stone industries -continuation of rock art industries
		Terminal MSA (ca. 20000-30000 y.a.)	-rock art (early paintings) Apollo 11, Namibia -modern humans
		Middle Stone Age (MSA)	-early modern humans -development and spread Archaeulian industries
Early Pliocene-	2000000-7500000	Early Stone Age (ESA)	-archaic humans -Oldowan industries Sterkfontein
Terminal Pliocene *		Early Stone Age (ESA)	
Plio-Pleistocene	4000000-2000000		?early hominine/hominids [only known in Kenya]
Terminal Miocene-Pliocene	7500000-4000000		?early hominine/ hominids [evidence from Chad, Kenya]
*The last two million years ago (mya) is sometimes referred to as the Quaternary			

ABBREVIATIONS

AIA	Archaeological Impact Assessment
MSA	Middle Stone Age
MIA	Middle Iron Age (aka Earlier Later Farmer Period)
LSA	Later Stone Age
LIA	Later Iron Age
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
IHMP	Integrated Heritage Management Plan
ESA	Earlier Stone Age
ECO	Environmental Control Officer
EMPr	Environmental Management Programme
HIA	Heritage Impact Assessment
NEMA	National Environmental Management Act
PHRA	Provincial Heritage Resources Authority
NHRA	National Heritage Resources Act
SAHRA	South African Heritage Resources Authority
HMP	Heritage Management Plan

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EXECUTIVE SUMMARY

Reach Archaeology Consulting (Pty) Ltd was appointed by *Moloi Granite* to undertake a grave identification and verification assessment report on the existing Granite Quarry on the Remainder of Portion 5 of the farm Schaapkraal 292JQ, District of Rustenburg, Northwest Province, South Africa.

A review of an HIA by APAC Heritage Constants provided an area with stone features, but no identifiable heritage resources were identified to be adversely impacted. The two locations were examined for possible archaeological and historical material and to establish the potential impact on any identifiable cultural material and/or burial grounds and graves.

The findings of this report have been informed by a desktop review of the provided approved Environmental Management Plan (EMP) and an on-foot field-based survey and assessment. The details and outcomes thereof are presented herein, with appropriate recommendations to guide heritage authorities, the client as well as the affected communities in making decisions with regard to the existing Granite Quarry. This heritage input assessment presents and discusses the results and findings of the field assessment conducted and provides necessary mitigation recommendations to ensure the preservation and/or conservation of identified heritage resources.

The field-based assessment recorded two (2) sites with features within the existing Granite Quarry. The area surveyed provided the potential impacts of the proposed prospecting on heritage matters and recommends the necessary, appropriate safeguards and mitigation measures that are designed to reduce the effects where applicable.

Although a number of known cultural heritage sites (archaeological and/or historical) exist in the larger geographical area within which the study area falls. The details specific to the site are contained in an HIA by APAC dated October 2018 *See attached reference list.

Whilst no public engagements or public participation/ consultation process was undertaken in the compilation of this report aside from a short site briefing and closeout held (details are provided below). The identified heritage features were limited to built-environment structures, burial grounds and graves, heritage objects and faunal remains associated with graves that were recorded appropriately.

The findings of this report, with approval of the SAHRA, may be classified as accessible to any interested and affected parties within the limits of the legislation. This report concludes that the impacts of the proposed prospecting on the cultural and environmental values are not likely to be significant on the entire development site if the EMP includes recommended safeguard and mitigation measures identified in this report.

Depending on SAHRA's acceptance of this report, the developer will receive permissions and or objections to the mitigation measures proposed for adoption by the competent authority.

INTRODUCTION

Reach Archaeology Consulting was appointed by Moloi Granite to assist with the identification and verification of heritage resources located within the bounds of their mining rights property on the Remainder of portion 5 of the farm Schaapkraal 292JQ, situated in the district of Rustenburg of the Bojanala District Municipality, in the North West Province, South Africa. This heritage input report compiled by Reach Archaeology Consulting documents the outcomes of the process and provides compliance recommendations on the effective management approaches that coincide with the national heritage resources act 25 of 1999.

The project scope entails the identification of heritage resources, including but not limited to heritage sites, objects, historical structures, burial grounds, graves and initiation and cultural sites of significance as defined by the NHRA. The project methodological approach includes the field-based site documentation with the relevant community and affected next-of-kin/ family representatives, with the aim of developing a heritage management plan that considers the culture of the people, in line with best practice methodological approaches in cultural heritage resources management.

No other businesses or land-use aside from mining have been documented on the site and larger area. Through a preliminary review of the previous Heritage impact assessment, a number of known cultural heritage sites (archaeological and/or historical) exist in the larger geographical area of Rustenburg with varying scales of significance. Within the quarry, known heritage sites included stone age scatter, iron age objects and heritage features dating to the early iron age and stone age periods of Southern African occupation.

The process of identification and verification was undertaken to document areas, sites, objects and features that may have been overlooked and/or were not identified in previous heritage studies and/or reports in an effort to provide for their conservation and protection in line with the legislation. The development of an integrated cultural heritage management plan is to guide and facilitate the process of heritage resources management through a comprehensive public participation approach.

This report presents the identified findings, discussions and process of documentation of cultural heritage resources undertaken by the field archaeologist as well as the relevant and affected community forum and groups, including the affected next-of-kin. No desktop and field assessments were conducted as such, and a heritage impact assessment and/or archaeological impact assessment is recommended to provide for heritage grading, significance assessment and ratings, impact evaluation as well as heritage mitigation recommendations in future. The development of an integrated heritage management plan is proposed for the urgent conservation of known and identified cultural resources in the quarry.

PURPOSE

The purpose of the compilation of this heritage input assessment and report is to satisfy the minimum requirements of section 38(8) and, therefore, section 38(3) of the National Heritage Resources Act (Act No 25 of 1999) for the compilation of an integrated heritage management plan.

An online and web-based survey of the relevant literature was not conducted to determine the area's heritage potential. According to the general minimum standards accepted by the archaeological

profession, the sites, objects and structures identified were documented, as provided for by the relevant community forum and affected families.

PROJECT SCOPE

This heritage input aims to inform the integrated cultural heritage management plan. This document will also inform the development of a comprehensive heritage impact assessment (HIA) to assist the developer in managing the identified heritage resources in a responsible, ethical and compliant manner.

In order to protect, preserve, and develop the heritage resources within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999) (NHRA), this heritage input falls within the regulations, guidelines and international best practice methodologies for cultural heritage management. This report subscribes to the basic principles of heritage resources management and is guided by similar ethical considerations.

This scope was specific to the extent of the quarry, also referred to as mine herein, on Remainder of portion 5 of the farm Schaapkraal 292JQ in North-West Province of South Africa and did not include areas or regions outside of the mining area.

TERMS OF REFERENCE

According to the minimum standards by SAHRA, a heritage input report may present the following key aspects:

- the identification and mapping of all heritage resources in the area affected;

In addition, this heritage input report should comply with the requirements of NEMA, including providing the assumptions and limitations associated with the study; the details, qualifications and expertise of the person who prepared the report; and a statement of competency.

This document was prepared in line with these legislative requirements; as such, the author was instructed to conduct a heritage input report addressing the following issues (in no particular order):

- Identify burial grounds and graves / associated grave goods objects, sites, occurrences, and structures of an archaeological or historical nature (cultural heritage sites) specific to burial grounds and graves;
- Propose suitable mitigation measures to minimise possible negative impacts on the cultural resources;
- Review applicable legislative requirements

BACKGROUND

The study area is located on the Remainder of portion 5 of the farm Schaapkraal 292JQ, situated in the district of Rustenburg of the Bojanala District Municipality, in the North West Province, South Africa. The open-pit granite and Dimension stone quarry portion extends to 156,30Ha and is approximately 45km east of Brits.

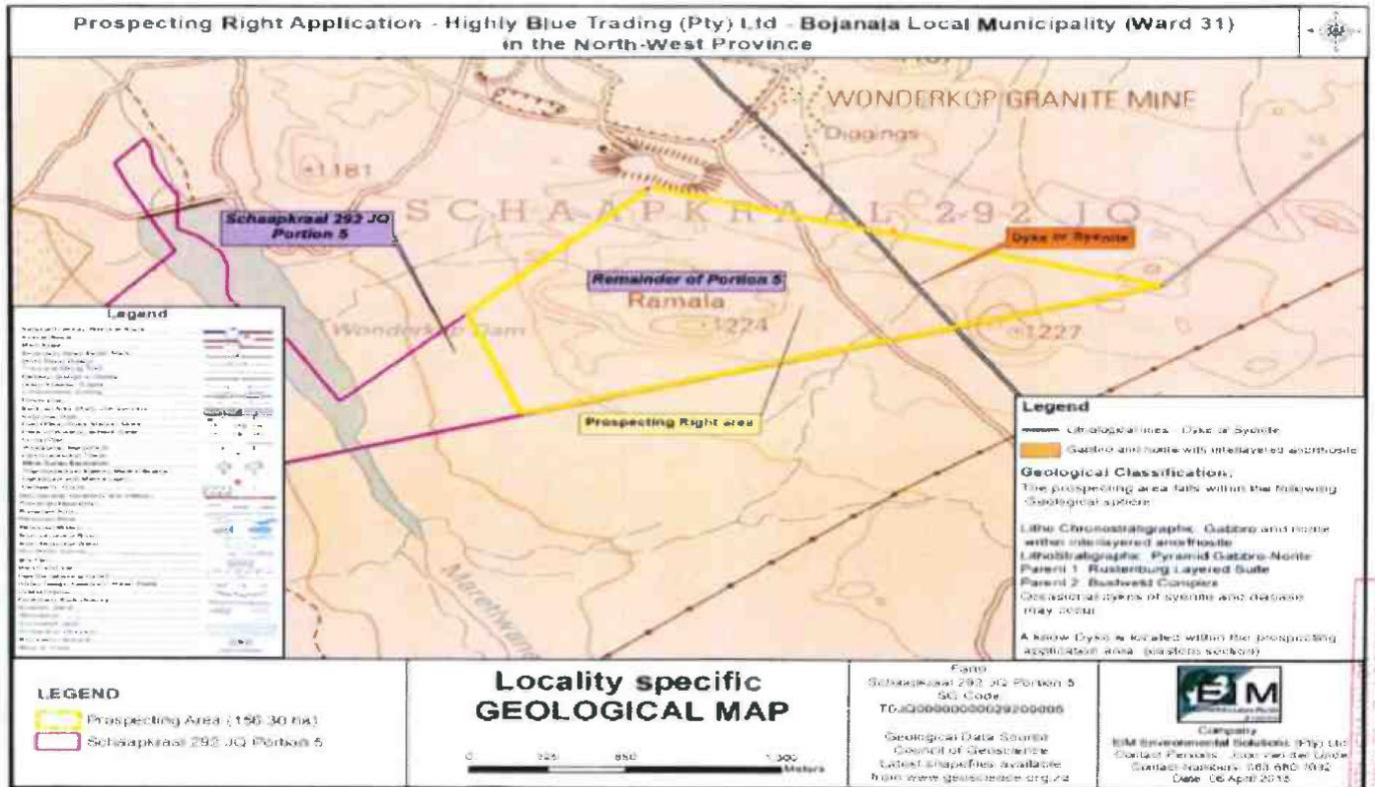


Figure 1: Site Map/ Area Map

The topography of the study area is dominated by small-large granite outcrops and ridges. In the EIA/EMP Blue trading: NW 30/3/1/2/2/ 12354 PR (pg 78), a heritage assessment conducted in 2018, noted that a number of archaeological/ historical sites, features and materials were identified and recorded, including some isolated (scatter) stone age tools were identified in the area. A number of sites and features dating to the Iron Age period with appropriate mitigation measures were identified and discussed, including some recent historical remains.

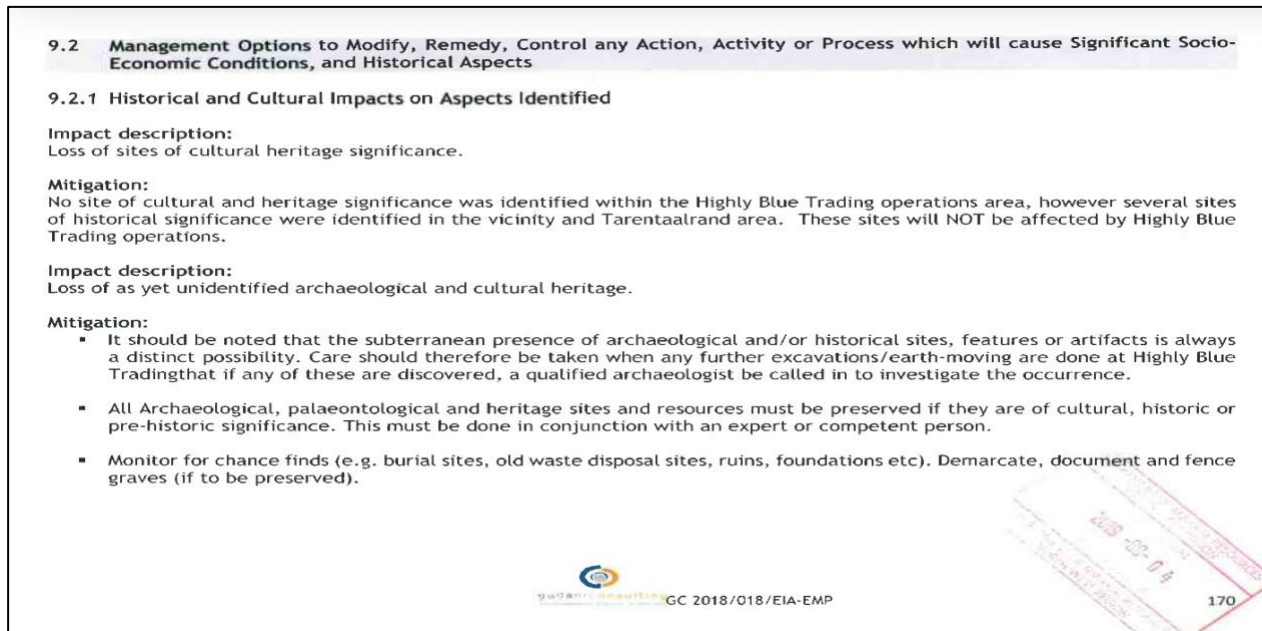


Figure 2: Abstract from Approved EIA/EMP report (2018). Note the mitigation recommendations

Previous Public Participation Process

The predominant indigenous Setswana speaking. People Segwaelaneng, Wonderkop and surrounding farm homesteads situated around the project site make up the majority of the community representatives identified through the public participation process undertaken in 2018, compliant with NEMA regulations and guidelines in the stakeholder engagement process.

A review of the public participation meeting summary and meeting minutes notes that the practitioner mentioned to the community that a heritage report by the appropriate specialists would be conducted, amongst others. The report also notes community raised concerns and comments on illegal mining previously undertaken in the area. Details of the public participation consultants are provided in the table below:

Table1: Details of the previously undertaken public participation practitioner

Name of Public Participation Practitioner	Gudani Consulting
Contact Person	Itumeleng Senamela
Postal and Physical Address	P. O. Box 714 37A Voortrekker Street Faunapark Blouberg Blouberg 0699 0787
Contact details	Tel: 015 291 3620 Cell: 073 169 4047 Fax: 015 291 4932 Email: itumeleng@gudaniconsulting.co.za Website: www.gudaniconsulting.co.za
Qualifications of the EAP to carry out the PP process	Seven years of experience working as a Public Participation Officer

Previous Heritage Impact Assessment Summary Findings

In line with the appropriate NEMA, MPHRA and NHRA legislation and regulations, an extensive detailed Phase 1 Heritage Impact Assessment (HIA) report was conducted in October 2018 by APAC Archaeological Consulting on behalf of Gudani Consulting Environmental & Social Scientists. A review of the HIA provides that a number of known cultural heritage sites (archaeological &/historical) exist in the larger geographical area within the study area. Oral histories were undertaken where possible.

Findings included

1. **Site 1:** Stonewalling site along with undecorated pottery.
2. **Site 2:** Stone packed livestock enclosure that is believed to be relatively recent and not related to the LIA sites within the study area.
3. **Site 3:** Stonewalling site with undecorated pottery and early MSA stone tool scatter. The identified cupules/ hollows identified could be related to rain making sites or a Marabaraba gaming board.
4. LIA stone-walled settlements located at **Sites 4 & 5** were rated highly significant and would require appropriate site documentation and the application of a demolition permit prior to their adversely/ negatively impacted.
5. **Site 6** is located in the Site Office area, and consists of recent historical structures and some scatters of typical Iron Age pottery. The recommendations include detailed site mapping and recording of the identified heritage sites.

The previous HIA findings by archaeologists state that the area boasts a very disturbed and/or altered cultural landscape spanning the archaeological and historical time periods. Various cultural objects and material finds were appropriately mapped and recorded with the mitigatory measures provided in accordance with archaeological best practice methodological approaches. The site-specific details of these previous studies provide the baseline for our field-based grave identification and verification report. Specific to Site 6, where the site office is currently located, the alleged and/or possible adversely affected graves are located. Location-specific details are depicted in the map below.



Figure 3: Map of study area with identified heritage resources by APAC Heritage

It must be noted that the HIA did not identify any burial grounds and graves but does state that no cumulative impacts were included in the report. However, the report says that “It should be noted that although all efforts are made to cover the total area during any assessment therefore to identify all possible sites or features of cultural (archaeological and/ or historical) heritage origin and significance, that there is always the possibility of something being missed. This could include unmarked graves. This aspect should be kept in mind when development work commences, and if any sites (including graves), features or cultural material are identified, then an expert should be called in to investigate and recommend the best way forward.”

The EMP report dated June 2018 (page 36) states that “The probability of locating any significant artefacts during the phases of the development is likely high. According to the landowners, there are graveyards located adjacent to the vicinity of the proposed area. However, a heritage impact specialist is appointed and recommended precaution and mitigation measures for Highly Blue Trading (Pty) Ltd and landowners. Such reporting will be included in the EMP submission”. As no interviews, oral records/ traditions were reported/ recorded as part of the phase 1 HIA; these may have been excluded in the HIA compilation process.

METHODOLOGICAL APPROACH

The methodological approach undertaken falls within international archaeological best practice approaches. The section below outlines the methodologies used in the compilation of this assessment, in order of completion:

Summary of Methodology

- A review/ revision assessment was conducted of the provided approved EIA, including its associated; a comprehensive heritage/ archaeological survey has already been completed by APAC Archaeological Consulting (2018) *see reference list.
- An on-foot field survey of the site was undertaken in April 2022 to physically identify and determine the state and assess the condition of heritage resources, and/or assess the likelihood/ degree of heritage assets adversely affected by mining activity
- Recommendations, alternatives and/or mitigation options were proposed herein for consideration implementation

LEGISLATIVE FRAMEWORK

The identification and handling assessment of cultural heritage resources in South Africa is governed by the following legislative prescripts:

- i. National Heritage Resources Act, 1999 (Act No. 25 of 1999) The National Heritage Resources Act (NHRA) legislates the necessity for cultural and heritage impact assessment in areas earmarked for development which exceeds 0.5 ha (5000 sq. m) or linear development exceeding 300 metres in length. The Act makes provision for the potential destruction of existing sites, pending the archaeologist's recommendations through permitting procedures. Permits are administered by the South African Heritage Resources Agency (SAHRA).

Section 34, 35, 36 and 38 speak directly to my person undertaking any development in the above categories, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development. Section 38 (2) (a) of the NHRA also requires the submission of a heritage impact assessment report for authorisation purposes to the responsible heritage resources agencies (SAHRA/PHRAs).

- ii. National Environmental Management Act (NEMA) Act 107 of 1998, Regulation 19 and 22, 23. The new regulations in terms of Chapter 5 of the NEMA provide for an assessment of development impacts on the cultural (heritage) and social environment and for Specialist Studies in this regard. The applicant, environmental consultant, SAHRA or PHRA and interested and affected parties must report to its existing heritage resources that may be affected by the proposed development and record mitigatory measures aimed at reducing the risks of any adverse impacts on these heritage resources
- iii. Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002, Section 39(3)
- iv. The Human Tissue Act 65 of 1983 and Ordinance on the Removal of Graves and Dead Bodies of 1925
- v. Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002)

The general principles for heritage resources management are provided to ensure ethical parameters for conservation and management for heritage practitioners:

5. (1) All authorities, bodies and persons performing functions and exercising powers in terms of this Act for the management of heritage resources must recognise the following principles:

- (a) Heritage resources have lasting value in their own right and provide evidence of the origins of South African society, and as they are valuable, finite, non-renewable and irreplaceable, they must be carefully managed to ensure their survival;
 - (b) every generation has a moral responsibility to act as trustee of the national heritage for succeeding generations, and the state has an obligation to manage heritage resources in the interests of all South Africans;
 - (c) heritage resources have the capacity to promote reconciliation, understanding and respect and contribute to the development of a unifying South African identity; and
 - (d) heritage resources management must guard against the use of heritage for sectarian purposes or political gain.
- (2) To ensure that heritage resources are effectively managed—
- (a) the skills and capacities of persons and communities involved in heritage resources management must be developed; and
 - (b) provision must be made for the ongoing education and training of existing and new heritage resources management workers.
- (3) Laws, procedures and administrative practices must—
- (a) be clear and generally available to those affected thereby;
 - (b) in addition to serving as regulatory measures, it also provides guidance and information to those affected thereby; and
 - (c) give further content to the fundamental rights set out in the Constitution.
- (4) Heritage resources form an essential part of the history and beliefs of communities and must be managed in a way that acknowledges the right of affected communities to be consulted and to participate in their management.
- (5) Heritage resources contribute significantly to research, education and tourism, and they must be developed and presented for these purposes in a way that ensures dignity and respect for cultural values.
- (6) Policy, administrative practice and legislation must promote the integration of heritage resource conservation in urban and rural planning and social and economic development.
- (7) The identification, assessment and management of the heritage resources of South Africa must—
- (a) take account of all relevant cultural values and indigenous knowledge systems; (b) take account of material or cultural heritage values and involve the least possible alteration or loss of it;
 - (c) promote the use and enjoyment of and access to heritage resources in a way consistent with their cultural significance and conservation needs;
 - (d) contribute to social and economic development;
 - (e) safeguard the options of present and future generations; and
 - (f) be fully researched, documented and recorded.

Burial grounds and graves national policy (extracted 2021)

36. (1) Where it is not the responsibility of any other authority, SAHRA must conserve and generally care for burial grounds and graves protected in terms of this section, and it may make such arrangements for their

conservation as it sees fit.

- (2) SAHRA must identify and record the graves of victims of conflict and any other graves that it deems to be of cultural significance and may erect memorials associated with the grave referred to in subsection (1) and must maintain such memorials.
- (3) (a) No person may, without a permit issued by SAHRA or a provincial heritage resources authority—
 - (a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of the conflict, or any burial ground or part thereof which contains such graves;
 - (b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
 - (c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment or any equipment which assists in the detection or recovery of metals.
- (4) SAHRA or a provincial heritage resources authority may not issue a permit for the destruction or damage of any burial ground or grave referred to in subsection (3)(a) unless it is satisfied that the applicant has made satisfactory arrangements for the exhumation and re-interment of the contents of such graves, at the cost of the applicant and in accordance with any regulations made by the responsible heritage resources authority.
- (5) SAHRA or a provincial heritage resources authority may not issue a permit for any activity under subsection (3)(b) unless it is satisfied that the applicant has, in accordance with regulations made by the responsible heritage resources authority—
 - (a) made a concerted effort to contact and consult communities and individuals who, by tradition, have an interest in such grave or burial ground; and
 - (b) reached agreements with such communities and individuals regarding the future of such grave or burial ground.
- (6) Subject to the provision of any other law, any person who in the course of development or any other activity discovers the location of a grave, the existence of which was previously unknown, must immediately cease such activity and report the discovery to the responsible heritage resources authority which must, in cooperation with the South African Police Service and in accordance with regulations of the responsible heritage resources authority—
 - (a) carry out an investigation for the purpose of obtaining information on whether or not such grave is protected in terms of this Act or is of significance to any community; and
 - (b) if such grave is protected or is of significance, assist any person who or community which is a direct descendant to make arrangements for the exhumation and re-interment of the contents of such grave or, in the absence of such person or community, make any such arrangements as it deems fit.
- (7) (a) SAHRA must, over a period of five years from the commencement of this Act, submit to the Minister for their approval lists of graves and burial grounds of persons connected with the liberation struggle and who died in exile or as a result of the action of State security forces or agents provocateur and which, after a process of public consultation, it believes should be included among those protected under this section.
- (b) The Minister must publish such lists as they approve in the Gazette.
- (8) Subject to section 56(2), SAHRA has the power, with respect to the graves of victims of conflict outside the Republic, to perform any function of a provincial heritage resources authority in terms of this section.
- (9) SAHRA must assist other State Departments in identifying graves in a foreign country of victims of conflict connected with the liberation struggle and, following negotiations with the next of kin, or relevant authorities, it may re-enter the remains of that person in a prominent place in the capital of the Republic.

SAHRA General policy

47. (1) SAHRA and a provincial heritage resources authority—

- (a) must, within three years after the commencement of this Act, adopt statements of general policy for the management of all heritage resources owned or controlled by it or vested in it; and

- (b) may from time to time amend such statements so that they are adapted to changing circumstances or in accordance with increased knowledge; and
 - (c) must review any such statement within 10 years after its adoption.
- (2) Each heritage resources authority must adopt for any place which is protected in terms of this Act and is owned or controlled by it or vested in it, a plan for the management of such place in accordance with the best environmental, heritage conservation, scientific and educational principles that can reasonably be applied taking into account the location, size and nature of the place and the resources of the authority concerned, and may from time to time review any such plan.
 - (3) A conservation management plan may at the discretion of the heritage resources authority concerned and for a period not exceeding 10 years, be operated either solely by the heritage resources authority or in conjunction with an environmental or tourism authority or under contractual arrangements, on such terms and conditions as the heritage resources authority may determine.
 - (4) Regulations by the heritage resources authority concerned must provide for a process whereby, prior to the adoption or amendment of any statement of general policy or any conservation management plan, the public and interested organisations are notified of the availability of a draft statement or plan for inspection, and comment is invited and considered by the heritage resources authority concerned.
 - (5) A heritage resources authority may not act in any manner inconsistent with any statement of general policy or conservation management plan.
 - (6) All current statements of general policy and conservation management plans adopted by a heritage resources authority must be available for public inspection on request.

ASSUMPTIONS AND LIMITATIONS

Archaeological sites, as defined by the National Heritage Resources Act (Act 25 of 1999), are places in the landscape where people once lived in the past;

- generally more than 60 years ago
- and have left traces of their presence behind. In South Africa, archaeological sites include hominid fossil sites, places where people of the Earlier, Middle and Later Stone Age lived in open sites, river gravels, rock shelters and caves, Iron Age sites, graves, and a variety of historical sites and structures in rural areas, towns and cities.

Palaeontological sites are those with fossil remains of plants and animals where people were not involved in the accumulation of the deposits. The basic principle of cultural heritage conservation is that archaeological and other heritage sites are valuable, scarce and non-renewable. Many such sites are unfortunately lost daily through infrastructure developments such as powerlines, roads and other destructive economic activities such as agriculture.

The sub-surface archaeological, palaeontological heritage site, objects and features. These heritage resources may only be identified during the earthmoving, clearing phase of development. These heritage assets located during the fieldwork do not necessarily represent all the possible heritage resources present within the development area. Some assumptions were made as part of the study and, therefore, some limitations, uncertainties and gaps in information would apply. These are presented below alongside the limits of the assessment:

- All information and project-specific details provided by the client are factually correct
- All site images, co-ordinates and site-specific geospatial data provided by the client are assumed to be accurate.
- Desktop geospatial assessment of topographic maps was not undertaken

The author notes the following **considerations**:

- Due to Covid-19 lockdown travel restrictions, the field survey was limited to one day and focused on the areas the community indicated as adversely affected,
- The surveyed area was limited to areas identified; the larger area was not surveyed as this falls outside the scope of this report
- This assessment was undertaken in the summer/autumn season with limited visibility in areas covered with vastly overgrown grass vegetation.
- No ethnographic studies were undertaken as part of this study, and no interviews or oral traditions were gathered beyond the meeting minutes (to be provided by the client)
- This report contains no assessment of palaeontological records or physical assessment
- No excavations or sampling were undertaken since a permit from heritage authorities is required to disturb a heritage resource. As such, the results herein discuss superficially surficial observed indicators. However, these surface observations concentrated on exposed sections such as the disturbed sites, road clearings, road cuts and clear quarry areas
- Public consultations are being conducted by the client, and any issues raised by Interested and Affected parties will be presented during these public meetings. Any issues or

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problems relating to heritage will be forwarded to the appropriately appointed heritage specialist/ public participation consultant

- The assessment was limited to a general survey and included a detailed inspection of specific locations that have/will be affected by the current mining activities.
- Due to time limitations and scope, condition assessments were provided for burial grounds (sites) and not individual graves.
- It is assumed that the client and relevant community members are aware of previous illegal mining activities that existed prior to the 2018 EIA/EMP prospecting rights applications
- No intangible heritage sites were identified, recorded and/or denoted herein

The field survey did not include any form of subsurface inspection beyond the inspection of burrows, road cut sections, already disturbed road sections, and the sections exposed by natural erosion and/or machinery.

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STAKEHOLDER ENGAGEMENT



The following brief issues were noted (detailed meeting minutes were not taken as this was not a formal stakeholder engagement meeting, this would fall outside the scope of this assessment):

The briefing began at 10:30 am on 20 April 2022. Attendees included the chairperson and representatives of Schaapkraal Communal Property Association (CPA), who are the landowners, mine representatives and affected community members.

- Mr Rantholo: The CPA began by stating that they had no knowledge of graves on the property or of any family members of graves, they are undertaking this process as willing participants to identify the graves and any other places of heritage significance on the mine.
- Mr Bola: Asked Mr Moloi, are these all consultants & stakeholders? Your email stated otherwise.
- Mr Moloi: The people from the municipality from the last meeting suggested we first engage a specialist an archaeologist to do an initial investigation
- Ms Matabane: Let us remember this is a legislated process, and at some point in this processes, we will invite the municipality, police and all the other relevant stakeholders.
- CPA: We never said there were no graves. We said this area was inaccessible with thick vegetation and overgrowth. So it was difficult to tell/or say if there were graves here.
- Mr Rantlolo: It's important to acknowledge that a mistake was made. How do we rectify it.
- Mr Bola: You CPA members were well aware there were graves here; you should've gotten archaeologists before to check the ground when it was cleared.

Summary findings of the briefing:

1. The community stated the graves that have been affected were known to the mine and alleged that they were purposefully destroyed by the use of machinery to build site offices.
2. The community stated that meetings to discuss restitution and/or negotiate with affected families for wake fees had already begun
3. The community would like a memorial plaque erected for the graves that have been destroyed and to ensure that the names of the deceased are placed on the plaque so future families can also come forward to pay respects and have a ritual site. The client

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is advised that this is to be taken into consideration when deliberations regarding the Heritage Management plan are being drafted.

4. The community also mentioned issues relating to access control to the graves for rituals; these are to be included in the integrated heritage management plan
 5. Community members took video footage as well as digital images/ photographs
 6. It was explained that this process is a preliminary assessment and that it is transparent.
- It was also explained that there are many relevant stakeholders that may need to be consulted to facilitate and guide the process of ensuring the conservation, mitigation and protection of heritage resources. This includes the local municipality, the department of health, the North-West Provincial heritage resources agency, the local South African police services, the department of mineral resources, the local tribal/traditional authority (if relevant) as well as the South African Heritage Resources Agency.



Figure 4: On-site briefing attended by mine representatives, CPA representatives community group *see attached attendance register Appendix A



Figure 5: On-site de-briefing of attendees at the closure of the meeting

FIELDWORK SURVEY RESULTS

Following the briefing, the field-based identification and documentation began. Numerous heritage objects and sites were identified and mapped during the on-foot field-based assessment. These included lithic scatter, broken decorated and undecorated potshards, as well as recently exposed faunal remains.

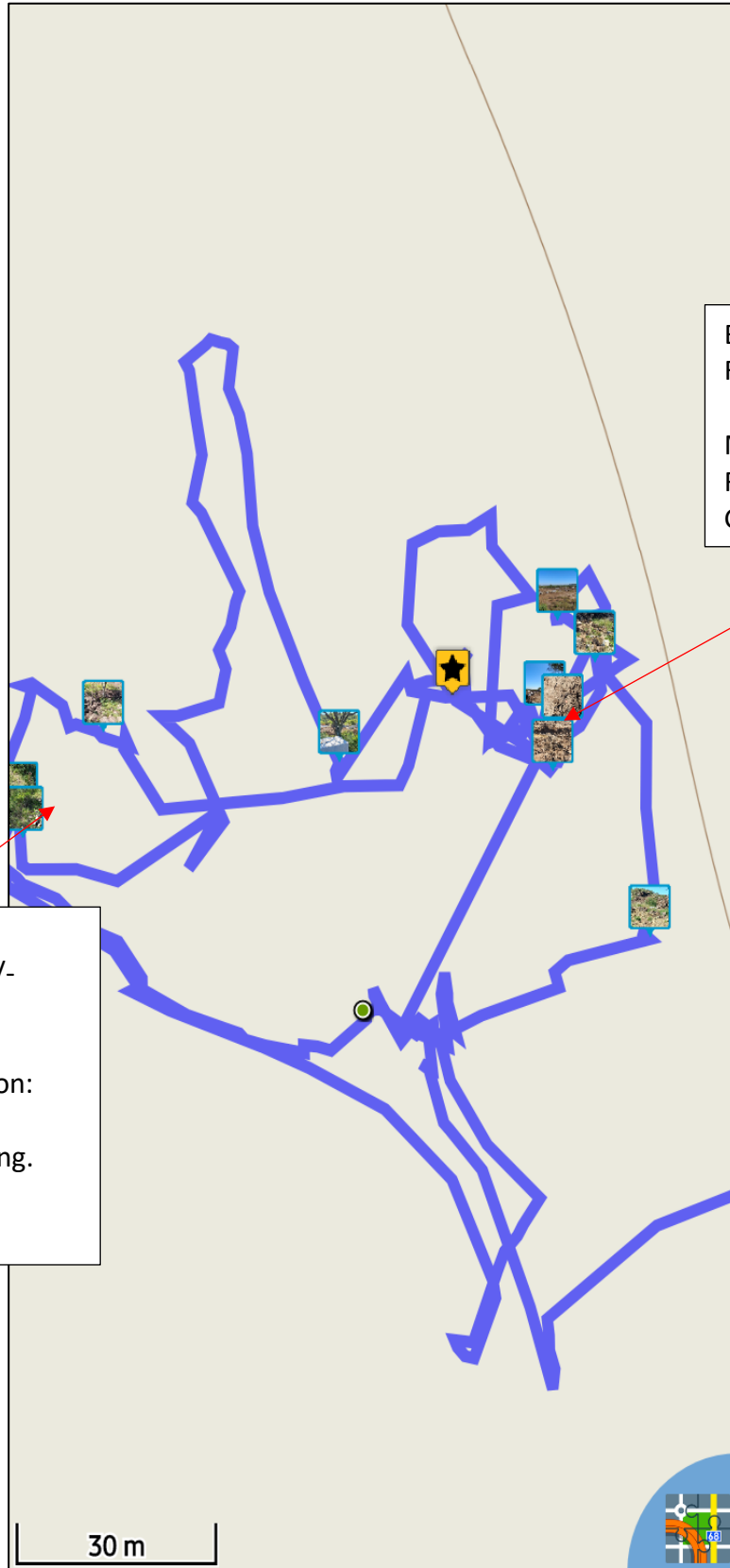
A total of two burial grounds/ gravesites were indicated by the community on-site, appropriate labelled BGG01 and BGG02. Other heritage objects were recorded, and this section presents the findings thereof. The identified burial grounds are considered

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of high value and are rated HIGHLY significant. The other objects were not valued, graded or rated as this falls outside the scope of this report.



Figure 6: Site Map indicating surveyed area with identified heritage resources



BGG Site 1: Disturbed, Identified Faunal Remains

Mitigation. Recommendations: Rescue Excavation to confirm Graves

BGG Site 2: Moderately Disturbed, stone packed +/- 30graves

Mitigation Recommendation: In Situ Preservation Demarcation by 50m fencing. 100m buffer maintained. Signage.

Figure 7: Site Map with tack log indicating surveyed area with identified faunal remains identified by yellow star



Figure 8: Note historic structure (confirmed as an old farmhouse by the community) in the backdrop within BGG area 1



Figure 9: Image indicating disturbed stone walling site



Figure 10: View of site office from the west (burial ground 2)



Figure 11: Location of disturbed graves, note depth of surface excavation



Figure 12: Note broken undecorated ceramic potshard fragments and faunal material



Figure 13: Identified decorated potshard



Figure 14: Moderately disturbed burial ground 2 approximate 30 unmarked packed graves with natural stone used as a headstone, all SW facing (Close Up of grave in

the top right corner)



Figure 15: Note TLB/Tractor marks of disturbed unmarked stone packed graves



Figure 16: Note circular stone packed graves impacted by disturbed topsoil movement (BGG site 2)



Figure 17: Note similar stones of previously stone packed graves impacted by disturbed topsoil movement (BGG site 1)

SUMMARY FINDINGS

A total of five (5) heritage resources were identified through the on-foot field-based identification and verification assessment. A total of 2 burial grounds were assessed. They identified age of the graves is dated to the historical period (the 1960s), and the graves are approximately 57 years old (according to Mrs Kampi, who lived there). Other heritage sites were appropriately recorded in the summary table below with the appropriate mitigation recommendations for implementation:

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Table 2: Table indicating identified heritage resources with appropriate mitigation recommendations:

Site Code	Date of Assessment	Co-ordinate Data	Ave grave dimensions	Heritage Resource	Condition Assessment	Age of Burial/ grave	Photo ID	Deceased Name	Child/Adult grave	Gender	Family Name	Grave Claimant	Relationship to the deceased	Grave Inscription	Grave Assessment	Stabilisation	Direction	Mitigation Recommendation	Notes
BGG01	20-04-2022	S 25°37'741."S 27°31'.478"E	-	Approx 6 Kampi family graves. Next to old homestead. Identified Faunal Material (broken scapular)	Severe	1965		Ramogolo Monnia	Adult, + Childrens graves	Male	Kampi	Bridget Kampi	Uncle & x2 Brothers	-	Heavily disturbed	Confirmation	Unconfirmed	Rescue, test excavation to confirm presence of grave	Heavily disturbed area where possible graves may have existed
BGG02	20-04-2022	S 25°37'43.902" S 27°31'25.272"E	3x1m	Approx. 30 graves	Poor	-		Raktali, Mosima, tIhaba, Nzeku, Kampi, Bola Mboni, Mhlakazi (x2 Brothers), Ndabambi, Nakeli, Modisakeng, Makhum, Mdeteng, Gog, Ester	Adult	-	-	-	-	Natural Stone used as headstone, stone packed, unmarked	Moderately disturbed	stabilisation for some disturbed	SW facing	In situ preservation, 50m fencing & demarcation & 100m buffer	Moderately disturbed, stone packed, unmarked. Heritage management plan
		S 25°37'43.526" S 27°31'25.739"E			Severe	-			-	-	-	-	Circular stone outline	Heavily disturbed	Confirmation				
		S 25°37'43.902" S 27°31'25.272"E			Severe	-			-	-	-	-	TLB/ Tractor Markings heavily impacted graves	Moderately disturbed	Stabilisation				
		S 25°37'43.207" S 27°31'28.404"E			Poor	historic			-	-	-	-	Natural stone packed, stone outlined, unmarked	Moderately disturbed	Stabilisation				
AOI01	20-04-2022	S 25°37'43.366" S 27°31'27.634"E	-	Faunal Material, Broken Ceramic Potshards	Severe	-		Child	-	-	-	-	-	Heavily disturbed	None	-	Rescue, collection of faunal remains for reinterment, test excavation to confirm presence of grave	Heavily disturbed area where possible graves may have existed	
HO1	20-04-2022	S 25°37'43.497" S 27°31'28.230"E	-	Ceramic, broken undecorated, broken faunal scapular	Severe	historic		Child	-	-	-	-	-	Heavily disturbed	None	-	Rescue, collection of faunal remains for reinterment, test excavation to confirm presence of grave	Heavily disturbed area where possible graves may have existed	
HO1	20-04-2022	S 25°37'43.014" S 27°31'28.201"E	-	Historic structure, homestead	Severe	historic		-	-	-	Kampi	-	-	Heavily disturbed, dilapidated structure	Demolition	-	Destruction permit not recommended, adverse impacts are negligible	Heavily disturbed historic homestead, dilapidated structure. Mrs B Kampi indicated this was her old house prior to the forced removals	

Link to Heritage Resources spreadsheet: https://docs.google.com/spreadsheets/d/1qHnbS_z2TxkyyM_4oX-hZxqL0bEFWpxQE9nF-sxC0K4/edit#gid=0

CONCLUSION & RECOMMENDATIONS

This heritage input assessment was completed in terms of the National Heritage Resources Act (NHRA) minimum standards and requirements and the best practice methodologies as prescribed by the Association of Southern African archaeologists (ASAPA).

Reach Archaeology Consulting was appointed to affect the identification and recording of alleged graves and/or burial grounds adversely impacted and/ destroyed/ demolished in the study area. This section presents the appropriate mitigatory recommendations and conclusions of the findings of this assessment.

There were community raised allegations regarding the disturbance of graves on the Remainder of portion 5 of the farm Schaapkraal 292JQ, situated in the district of Rustenburg of the Bojanala District Municipality, in the North West Province, South Africa. An investigation of the allegations led to a grave identification and verification heritage input report being commissioned by Moloi Granite.

The following proposed recommendations are provided in line with the minimum standards of heritage conservation and best-practice methods of cultural heritage conservation in line with the MPHRA, NHRA and the NEMA.

The following recommendations are provided in line with the relevant legislative prescripts:

1. Report the disturbance of the alleged disturbance/ destruction of the burial ground 1, the heritage authority and the local SAPS to provide appropriate mitigatory recommendations
2. Application for rescue permit to provide for the appropriate collection of cultural objects, artefacts, and material finds in the affected area.
3. Application for test excavation permit to investigate the allegations of the disturbed/ destroyed burial ground site 1. Should grave goods and/or human remains be identified, a complete phase 2 heritage impact assessment to be undertaken, including a complete public participation process to identify the affected communities and/or next-of-kin to
4. A detailed paleontological study/report is to be included in a revised Phase 1 Heritage Impact Assessment report for comments from the appropriate competent heritage authority. Chance finds protocols to be implemented in the interim: any adversely affected palaeontological finds or disturbed fossils should be collected and stored safely until they can be inspected by a palaeontologist, and no attempt should be made to remove such accidentally discovered fossils from the rock by an unqualified person.
5. Undertake an extensive heritage specific public participation process to identify other heritage resources, including burial grounds and graves, heritage sites, objects, features and intangible cultural areas.
6. Regarding the identified burial ground(s)/ unmarked graves, it is noted the graves are younger than 60years; these are to be appropriately demarcated, with a 100m buffer and a 50m perimeter fencing, with dust coverings and appropriate signage placed.
7. An integrated heritage management plan (IHMP) to be drafted and adopted by a qualified heritage practitioner, in line with Sections 34, 35, 36 and 38 of the NHRA to provide for the appropriate mitigation measures to ensure the conservation and protection of all known and identifiable heritage resources. The IHMP is to be included

- in the EMP for the Environmental Control Officer (ECO) to ensure its implementation and revision.
8. Formal submission of the heritage management plan (HMP) to the appropriate competent heritage authority (South African Heritage Resources Agency -SAHRA) for approval and implementation.
 9. The IHMP should include site management and the management of the requested memorial plaque to ensure the protection of the graves on site.
 10. Chance finds protocols for any archaeological remains, artefacts and/ burial grounds and/or sub-surface material finds and objects to be adhered to as prescribed by the NHRA Regulations.
 11. Concerning the identified dilapidated historic structure (old farmhouse/ homestead) to be demolished, a demolition permit is not recommended because the structure is already heavily disturbed and dilapidated.



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APPENDIX A: ATTENDANCE REGISTER

SCHAAPKRAAL GRAVE IDENTIFICATION PUBLIC MEETINGS ATTENDANCE REGISTER					
DATE: 20/04/2022 TIME: 10:33 VENUE: Moloi Granite Site Office					
NAME, SURNAME	CELL NUMBER	EMAIL/ PHYSICAL ADDRESS	FAMILY/ REPRESENTATION	SIGNATURE	
Nmathamba Dingiswazi (kampi)	060 346 5792	nontsikelelorantho@gmail.com	Family	B. Dingiswazi	
Nontsikelelo Rantho	060 346 5792	"	Family	Rantho	
Hermineus Puntho	0714181295	"	Family	H. Puntho	
Milshred Bola	"	"	Family	Bola D.	
K.B. BOLA		balcampola@gmail.com	Concerned RESIDENT		
Melindi Neube	0769496983		Concerned	M Neube	
Ramziote	0664092796	"	Family		
NAME, SURNAME	CELL NUMBER	EMAIL/ PHYSICAL ADDRESS	FAMILY/ REPRESENTATION	SIGNATURE	
Bongi SHABA	0732336539		Family	Bongi SHABA	
Solly Motepe	0767814821		C.P.A	Solly Motepe	

APPENDIX B: GRAVE IDENTIFICATION AND VERIFICATION ASSESSMENT FORM

REACH ARCHAEOLOGY CONSULTING

SITE GRAVE IDENTIFICATION & VERIFICATION DOCUMENT
SCHAAPKRAAL GRAVE PROJECT

ASSESSED BY: Ms A Mathebe DATE: 20/04/2022
 PROVINCE: North-West TIME: 11:04
 JURISDICTION: Mari'kare MUNICIPALITY: Bajanala
 GRAVE CLAIMANT NAME: BN NAME OF BURIAL GROUND: BAC01
 LOCATION (GPS): 25° 27' 23" E 027° 51' 46" S FAMILY NAME: Dingiswajo-Kaape
 GENERAL CONDITION: FAIR IMAGE #: 011-035 HD camera
 GRAVE STONE: (ONLY COMPLETE WITH PRESENT) GOOD POOR SEVERE CRITICAL
 INSCRIPTION DETAILS: N/A

HEADER LEDGER FOUNDATION:	ZIM GRANITE MARBLE & GRANITE BELFAST GRANITE	CONCRETE CONCRETE & PEBBLES CONCRETE & GRANITE	SLATE SANDSTONE BRICK	RUSTENBURG GRANITE NATURAL CONCRETE & GRANITE
DAMAGE CHEMICAL STAINS PLANT ROOTS DECREPIT STONE SUNKEN	BURROW LICHEN PRESENT STONE COLOUR, OTHER (SPECIFY): <u>Rescue</u>	FLOODED FIRE DAMAGE CHIPS ON STONE	RISK/ THREATS THEFT DESTRUCTION (MECHANICAL, ANIMAL, HUMAN) NATURAL WATHERING FIRE	PROPOSED MITIGATION RELOCATION
IN SITU CONSERVATION	STABILISATION	RESCUE EXCAVATION	GRAVE MANAGEMENT PLAN	ASSESSOR SIGNATURE: <u>[Signature]</u>

REPRESENTATIVE SIGNATURE: B.N. Dingiswajo

REACH ARCHAEOLOGY CONSULTING

SITE GRAVE IDENTIFICATION & VERIFICATION DOCUMENT
SCHAAPKRAAL GRAVE PROJECT

ASSESSED BY: Ms A Matabane 255 37.7
 PROVINCE: North-West -27E 31.461
 JURISDICTION: Mankara
 GRAVE CLAIMANT NAME: 14 Families Nat Aff.
 LOCATION (GPS): 25° 37' 7" S 27° 31' 46" E

DATE: 20/04/2023
 TIME: 12:05
 GRAVE NUMBER: ± 30
 CONTACT NO: 060546 5792
 NOTES: ± 14 families. (30 Graves Id)

SITE ID: Srte 02. (Schaapkraal Gms)
 MUNICIPALITY: Mogale
 NAME OF BURIAL GROUND: BIGOR
 FAMILY NAME: (empty - ref to field notes)
 IMAGE #: 061718 09 HD Camera

GENERAL CONDITION: FAIR
 GRAVE STONE: (empty - COMPLETE WITH PRILL) Stone
 INSCRIPTION DETAILS: N/A - Stone packed; 4 Total Destroyed

CHEADER LEDGER FOUNDATION:	ZIM GRANTITE MARBLE & GRANITE BELFAST GRANITE	CONCRETE CONCRETE & PEBBLES CONCRETE & GRANITE	SLATE SANDSTONE BRICK
DAMAGE: <small>*only the appropriate</small> CHEMICAL STAINS PLANT ROOTS DECREPIT STONE SUNKEN	BURROW LICHEN PRESENT STONE COLOUR, OTHER SPECIFY:	FLOODED FIRE DAMAGE CHIPS ON STONE	RISK/ THREATS: <small>*only the appropriate</small> THEFT DESTRUCTION (MECHANICAL, ANIMAL, HUMAN) NATURAL WATHERING FIRE
PROPOSED MITIGATION: <small>*only the appropriate</small> RELOCATION	IN SITU CONSERVATION	STABILISATION	RESCUE EXCAVATION GRAVE MANAGEMENT PLAN

SEVERE CRITICAL
 REPRESENTATIVE SIGNATURE: B.N. Dinyiso
 ASSESSOR SIGNATURE: (Signature)