

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 12651

Date: Thursday October 18, 2018
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Final Comment

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Port Nolloth Sea Farms Ranching

Port Nolloth Sea Farms Ranching (Pty) Ltd (hereinafter referred to as PNSFR) ranches abalone in the Northern Cape Concession Area NC 3 and is in need of an abalone holding and processing facility to support the abalone ranching business. The proposed holding and processing facility is situated on State Land approximately 6 km south of Kleinsee, Northern Cape.

Anchor Environmental Consultants (Pty) Ltd have been appointed by Port Nolloth Sea Farms Ranching (Pty) Ltd to undertake an Environmental Authorisation (EA) Application process for the proposed abalone holding and processing facility on Stateland, near Kleinsee, Northern Cape Province.

A Basic Assessment Report (BAR) will be completed as per the National Environmental Management Act, 107 of 1998 (NEMA), and NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include holding tanks, fuel tanks, sheds, septic tanks, packing room, divers quarters, powerline discharge pipes and the seawater intake infrastructure will be upgraded.

In an Interim Comment issued on the 12/07/2018, SAHRA requested that a Heritage Impact Assessment (HIA) inclusive of an archaeological component and an assessment of Maritime and Underwater Cultural Heritage (MUCH). A diver's survey of the area to be impacted must accompany the assessment.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as maritime archaeology, built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

The draft Basic Assessment Report (dBAR) and appendices must be submitted at the start of the public review period so that an informed comment can be issued.

Since the issuing of the Interim Comment on the 12/07/2018, a response to the comment has been completed by Anchor Environmental. Additional photographs of the seawater intake pipes show that they are located over rocks and not near any sandy shore that might contain MUCH material remains.



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In an Interim Comment issued on the 08/08/2018, SAHRA noted the following response from the SAHRA MUCH Unit, "There is no need for a MUCH Impact Assessment or divers survey as the impact to the area below the high-water mark will be minimal and therefore not impact significant MUCH material culture."

Since the issuing of the above comment, the pre-application BAR and Archaeological assessment have been submitted. ACRM was appointed to provide the heritage assessment as per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Kaplan, J. 2018. Archaeological Impact Assessment: Proposed Abalone holding and processing facility on Stateland, near Kleinsee, Northern Cape.

Several shell midden deposits of low cultural significance and of medium significance (Site 8161) were identified within the proposed development area. Artefacts within the middens included Stone Age lithics, and Cape Coastal pottery fragments. Some shell midden deposits of medium significance (Site 8171 & 8181) were also noted outside of the project area, however these will not be impacted on.

Recommendations provided in the report include the following:

- Shovel testing (Site 8221) must be conducted prior to construction by a professional archaeologist in terms of a permit from SAHRA, to determine significance of archaeological deposits;
- Site 8171 must be declared as a 'No-Go area'. An archaeologist must demarcate the No-Go area prior to the construction of the abalone holding facility;
- Sensitive archaeological resources have been found at Site 8181, which lies outside of the site boundaries. The fence alongside should act as a barrier to entry where vulnerable and threatened archaeological sites are known to occur. A temporary fence (e.g. construction tape) must be erected if the fence has not been repaired when construction of the abalone holding and processing facility commences;
- The Environmental Control Officer/Environmental Site Manager must be briefed by the archaeologist prior to construction activities commencing;
- Should any unmarked human burials/remains or ostrich eggshell water flask caches for example, be uncovered, or exposed during construction activities, these must immediately be reported to the South African Heritage Resources Agency. Burials, etc. must not be removed or disturbed until inspected by the archaeologist; and
- The above recommendations must be included in the Environmental Management Plan (EMP) for the

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proposed development.

In an Interim Comment issued on 18/09/2018, SAHRA noted that there were no objections to the development and provided conditions that were to be included in the Final Pre-Application BAR and Environmental Management Programme (EMPr).

Since the issuing of the comment, a draft BAR process has been completed. There have been no changes in proposed activities between the Pre-Application BAR and the draft BAR.

Final Comment

The SAHRA Archaeological, Palaeontological and Meteorites (APM) Unit has no objection to the development in principle and supports the recommendations of the specialists as portrayed in the Pre-Application BAR. The recommendations of the specialists and the following conditions apply to the development and must be included in the Final BAR and EMPr:

- A permit in terms of section 35 of the NHRA and Chapter II and IV of the NHRA Regulations must be applied for prior to construction to conduct shovel test pits on Site 8221;
- A monitoring procedure and heritage awareness programme must be developed in addition to the bufferzone around site 8171. The Environmental Control Officer must monitor construction to ensure that no accidental damage occurs at site 8171;
- The no-go bufferzone around site 8171 must be submitted to SAHRA in the form of a map showing the boundary of the site, bufferzone and construction footprint;
- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- Should the project be granted Environmental Authorisation, SAHRA must be notified and all relevant documents submitted to the case file.

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Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/508293>
(, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.