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Heritage Resources Management Policies

Palaeontology Permitting Policy

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Abbreviations

APM Unit	Archaeology, Palaeontology and Meteorites Unit
AMAFA	Amafa KwaZulu-Natal Heritage
ECPHRA	Eastern Cape Provincial Heritage Authority
HRA	Heritage Resources Authority
HWC	Heritage Western Cape
NEMPAA	National Environmental Management: Protected Areas Act No 57 of 2003)
NHRA	National Heritage Resources Act (No 25 of 1999)
NHS	National Heritage Site
PHRA	Provincial Heritage Resources Authority
PI	Principal Investigator
PIA	Palaeontological Impact Assessment
SAHRA	South African Heritage Resources Agency
WHC	World Heritage Convention Act, 1999

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POLICIES AND GUIDELINES

POLICY NAME: PALAEOLOGY PERMITTING POLICY
Number: SG4.2.1

Date: April 2016

1. Purpose

- 1.1. Palaeontological Resources are finite and non-renewable; it is important to manage these particular resources in a transparent, fair, and objective manner.
- 1.2. This policy provides guidance on the management, protection and preservation of palaeontological resources based on the National Heritage Resources Act (NHRA) No. 25 of 1999. Legislation requires that permits be acquired from the relevant heritage resources authority for any disturbance or intervention of palaeontological resources.
- 1.3. The purpose of the permit system for palaeontology is to keep a record of the excavation/collection, preservation and curation of, as well as research activities on, palaeontological resources and to ensure that proper scientific standards are maintained.

2. Legislative Framework

- 2.1. Section 8 of the NHRA promotes a three-tier system of heritage resources management. This section of the NHRA outlines responsibilities in the management of heritage resources where SAHRA is responsible for the management of Grade I resources. Provincial Heritage Resources Authorities (PHRAs) are responsible for Grade II heritage resources, with Local Authorities responsible for the management of

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Grade III heritage resources. Such grading and criteria for grading are outlined in section 7 (and SAHRA Regulations pertaining to grading) of the NHRA.

2.2. SAHRA performs these functions on an agency basis on behalf of the PHRAs. Heritage Western Cape (HWC), Amafa KwaZulu-Natal and Eastern Cape Provincial Heritage Resources Authority (ECPHRA) are however managing palaeontological matters within their respective provinces. The export of all palaeontological material remains the responsibility of SAHRA as the national heritage resources agency as described in the gazetted List of Types of Objects.

2.3. This excludes palaeontological localities that have been declared Grade I (National Heritage Sites [NHS]) within these provinces, which is the competence of SAHRA.

2.4. Definitions:

- a) "Palaeontological" is defined in the NHRA as any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any locality which contains such fossilised remains or trace (xxxi under definitions in the NHRA No. 25 of 1999).
- b) "Locality" means a spatially restricted, specific area or location, in which fossils are found.
- c) The term "Formation" refers to a geological formation and is a fundamental unit of lithostratigraphy that has been identified as such due to its specific lithological characteristics, facies or similar properties.

3. Scope

3.1. The scope of this policy document will broadly focus on the following permitting areas and standards:

- a) Research: excavation and collection; destructive sampling and analysis;
- b) Development: mitigation and destruction;

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- c) Export of palaeontological objects for scientific research, education or exhibition purpose;
- d) Standards for Collection and Recording;
- e) Standards for Curation;
- f) Permit Reports;
- g) Monitoring Responsibility.

4. National Estate

- 4.1. Palaeontological localities, materials and objects form part of the national estate defined in section 3 of the NHRA as “those cultural resources of cultural significance or other special value”.
- 4.2. SAHRA must safeguard these resources so that they may be conserved for present communities and bequeathed for future generations. It is the responsibility of SAHRA to co-ordinate and monitor the management of the national estate by establishing national principles, standards and policies.
- 4.3. SAHRA aims to achieve this objective by adhering to the following principles:
 - a) Identify, record and manage nationally significant heritage resources and keep permanent records of such work;
 - b) Promote and encourage public understanding and enjoyment of the national estate and public interest and involvement in the identification, assessment, recording and management of heritage resources.

5. Aims of the SAHRA Permitting Policy

- 5.1. The aim of this policy is to:

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- Ensure that palaeontological work, for which a permit is required from SAHRA, is done according to the highest scientific standards; that accepted methods and protocols are always employed; and that the integrity of palaeontological localities and objects is not compromised;
- Ensure that palaeontological localities and objects are conserved for the enjoyment of future generations; that any intervention at a palaeontological locality or object employs the most non-destructive methods;
- Balance the economic needs of the country with the need for conservation where this applies to development.

6. General Principles of the Palaeontology Permitting Policy

- 6.1. Permits that may be applied for include excavation and collection, destructive sampling and analysis, temporary or permanent export and mitigation/destruction of a locality.
- 6.2. If the applicant is applying for a permit from SAHRA, the applicant must consult the SAHRA regulations regarding permitting (Government Gazette, 2000).
- 6.3. If the applicant is applying for a permit for collection/excavation/mitigation/destruction in, or analysis of fossil material from, a province with a functional Provincial Heritage Resources Authority (HWC, Amafa, ECPHRA), such application must be made to the relevant PHRA, except where such application is for the export of material.
- 6.4. Permit application fees are applicable¹. Export permit applications are free of charge.
- 6.5. When applying for a permit the following conditions shall apply:
 - a) Permits are issued to South African citizens and persons with permanent resident status in South Africa or scientists affiliated with a recognised institution in South Africa;
 - b) Applications for palaeontological work must be for legitimate reasons;

¹ See Government Gazette No. 669, 8 July 2005.

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- c) Permits for palaeontological work are issued only to persons whom SAHRA deems to be qualified palaeontologists and/or who have the appropriate experience and expertise in the specific area of specialisation (e.g., vertebrate palaeontology, palaeobotany) and the technique used (for the field work or lab analysis to be undertaken);
- d) Applicants are generally expected to have a M.Sc. degree in Palaeontology and appropriate experience in order to be the principal permit holder;
- e) If the applicant is not suitably qualified or lacks the relevant work experience related to the scope of work they applied for, it will be necessary for him or her to obtain the services of a suitably qualified and/or experienced professional;
- f) SAHRA may request the Curriculum Vitae of the applicant or of the person who will be undertaking the work;
- g) Where a student does not hold a M.Sc. degree, their supervisors or mentors may act as Principal Investigators (PI) and the permit shall be issued in the name of the PI. It is the responsibility of the permit holder to supervise all work including field work and the submission of permit reports;
- h) In the case of contract work, e.g. for Palaeontological Impact Assessments (PIA)², the Palaeontological Society of South Africa (PSSA) has provided a list of professional members that is available from the PSSA website (<http://palaeontologicalsociety.co.za/palaeontological-impact-assessments.html>);
- i) Palaeoanthropological localities — and localities where hominin remains might be encountered — are handled as archaeological sites and are permitted as such³;
- j) Applications must be carefully completed as the nature of the request helps determine the conditions of the permit and will accelerate the processing time;
- k) Request to renew permits must be done at least two months prior to the expiry of the existing permit;

6.6. The permit holder must submit detailed annual progress reports and a final permit report within one year of the expiry date of the permit (section 15 in this document). In

² See SG2.2 Guidelines: Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports.

³ See SG4.1.1 Guidelines to Archaeological Permitting Policy.

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instances where such conditions (or any other condition) are not complied with, SAHRA reserves the right to cancel a permit or refuse to renew such permit

7. Other Legislative Requirements

7.1. Approval from SAHRA does not negate the need to obtain authorisation or to comply with any conditions with respect to other legislations. Permit holders must familiarise themselves with any other legislation which might impose additional conditions. These might include, but not be limited to, the following legislations:

- a) National Environmental Management Protected Areas Act (NEMPA)
- b) World Heritage Convention Act

7.2. In some instances, a heritage site may be a declared World Heritage Site. In such cases permit holders must always ensure that:

- a) Research will not negatively impact the Outstanding Universal Value of the property;
- b) Work is done in accordance with approved Conservation Management Plans;
- c) The overall aesthetics of the site are taken into consideration and the research potential is in balance with its conservation worthiness.

7.3. When working in areas that are protected under the NEMPA, permit holders must be aware of the following possible restrictions or prohibitions:

- Restrictions to the use of vehicles;
- The removal of vegetation;
- Littering and pollution control;
- Restriction on water usage;
- The use of ablution facilities etc.

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8. Guidelines for Excavation and Collection Permits

- 8.1. Excavation and collection permits are generally issued for research or mitigation. The latter refers to the safe removal of palaeontological resources by an appointed professional palaeontologist to protect them from destruction by a development. An excavation/collection permit is issued to the qualified, appropriately experienced palaeontologist (section 6 in this document), who is the responsible head of the excavation.
- 8.2. Where necessary for funding applications, permits may be issued to “Applicant 1, who is working in association with Applicant 2”. The main permit holder (applicant 1) is responsible for ensuring that the highest possible standards of excavation and reporting are adhered to (section 13 in this document).
- 8.3. The highest possible scientific standards of recovery and recording should be applied so as not to lose additional palaeoenvironmental information (section 13 in this document).
- 8.4. The permit holder shall ensure the collected material is accessioned by, or accessioning has been arranged with, a curating institution before the permit expiry date. The institution is advised to make formal arrangements with the excavating/collecting palaeontologist regarding financial or other requirements, the handing-over process, preparation, curation and documentation of the collected material and the field records associated with it (as per the museum’s collections management policy).
- 8.5. After the permit expiry date, the material is managed by the curating institution and not by the permit holder; the researcher may arrange with the institution to have access to and analyse the material at all reasonable times.
- 8.6. Palaeontological heritage objects may not be sold or otherwise disposed of, except by approved de-accessioning procedures, as it belongs to the state.

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9. Excavation/Collection Permits for Research Purpose

9.1. Because of the varying spatial occurrence of fossils, one must distinguish between two types of excavation/collection permits:

- a) Excavation of fossils in a locality, and
- b) Collection in a broad area such as a formation where fossils may occur far apart from each other.

9.2. Conditions for both permit types include:

- a) An excavation/collection permit for the purpose of research is valid for three (3) years. Such permits are not transferable. A permit holder cannot allow additional work (that is not covered in the initial permit application) to be undertaken under the auspices of his/her permit on behalf of either another individual or institution.
- b) The permit holder must have a copy of the permit available in the field.
- c) Recovery methods that ensure that the greatest possible amount of information is recorded must be used.

9.3. Excavation/Collection in a Locality

- a) A locality must be recorded on, at least, a 1:10 000 or 1:50 000 map and geographical co-ordinates must also be recorded.
- b) During excavation, a detailed photographic record of the site, fossils and work in progress should be taken, as well as a plotting on a drawing of the positions of fossils in the locality.
- c) It is the responsibility of palaeontological excavators to fill in any dangerous trenches and, in the case of deep excavation, to stabilise the pit to the satisfaction of SAHRA and the landowner and/or to fence the locality if necessary for the safety of persons and animals. The budget must allow for closure of the excavation to avoid erosion when abandoned.

9.4. Collection in a Geological Formation or Group

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- a) An excavation/collection permit can be issued for geological formations or groups (not for supergroups such as the Karoo Supergroup). A permit must be obtained for each formation or group the researcher wants to work in.
- b) The necessity of a formation/group permit must be strongly motivated by the researcher.
- c) A formation/group permit may be issued to selected researchers affiliated with South African institutions only.
- d) The formation permit strictly only applies to the formation/group that was permitted.
- e) The researcher may apply for and hold more than one formation/group permit at any given time.
- f) Masters and PhD students as well as postdoctoral research fellows that are directly associated with the researcher may excavate/collect under his/her permit. The name and academic level of all students/postdoctoral research fellows working under this permit must be provided when applying for the permit as well as in the annual and final permit reports. Additional associated students/ research fellows may be added at a later stage but before the student/fellow commences the field work.
- g) Standard excavation/collection techniques apply.
- h) The formation/group permit is valid on the condition that written landowner permission is obtained when before/when entering the property and before excavation/collection starts. It is the permit holder's responsibility to obtain landowner permission for the areas that he/she or any student/postdoctoral research fellow working under this permit is doing field work in within the permitted formation/group. SAHRA may not be held liable for any losses, damage or death resulting from failing to obtain permission by the relevant landowner. The written landowner permission must be submitted to SAHRA with the annual and final permit reports and before the permit expires.
- i) The area must be clearly indicated on SAHRIS. Where a formation/group crosses provincial borders, permits need to be obtained from all relevant HRAs.
- j) If a formation/group permit is to be issued for a Quaternary formation containing palaeontological as well as archaeological material that may be collected, this should be indicated in the application and will be considered on a case to case basis.

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9.5. Excavation/Collecting Permits for Mitigation⁴

- a) Permits for mitigation are given where localities are threatened by development and/or mining, in which case arrangements should be made to conserve and protect the fossils and/or localities of significance rather than allowing their destruction by development/mining. Where this is not possible, mitigation must be arranged. Even if localities are not to be destroyed immediately they are likely to be exposed to erosion and damage and an adequate and representative sample of the contents must be taken by a qualified palaeontologist. The developer must apply for a permit for destruction if the remainder of a locality is to be destroyed.
- b) The highest possible standards of collection or excavation and recording apply, as detailed in section 13 in this document.

9.6. How to apply for this Permit

- For excavation of palaeontological resources in all provinces except the Western Cape (for excavation in the Western Cape please contact HWC at <http://www.hwc.org.za/making-an-application>), an application must be lodged on SAHRIS (<http://sahra.org.za/sahris>; how to: <http://www.sahra.org.za/content/quickstart-guide-making-palaeontological-permit-applications-sahris>) together with the following documentation:
- General information, both geological and geographical, on the locality or formation, where excavation/collection will take place, including a map of the area.
- Name, affiliation and address of the applicant.
- Name, affiliation and address of the museum director or head of university department, with which the applicant collaborates and which will store the material, associated data and records after collection.

⁴ See G4.1.1 Guidelines: Assessment and Mitigation of Archaeological and Palaeontological Heritage Resources as Prerequisites for Mining and Prospection.

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- An expanded motivation letter (some research background, the reason for excavation/collection, including the kind and significance of the fossils that are expected to be excavated/collected, and the methods used). In case of a formation permit, this letter must clearly explain the necessity to collect within a large area. In case of a mitigation permit, a plan of action must be submitted. If this information is confidential, it should be uploaded to the section "Extended motivation (for Heritage Officers only)".
- The application must include the written agreement (signature) of the museum director or head of the university department, with which the applicant collaborates and which will store the material after collection.
- List of excavation equipment expected to be used. If methods (e.g., hydraulic fracturing) are used that are not commonly in practice and are not listed in the motivation letter, a new permit must be applied for.
- Proof of payment of the permit fee.

9.7. For collection in a formation/group the following additional details shall be provided:

- a) List of all students/postdoctoral fellows collecting under this permit including their association with the permit holder, indicating their position/academic level.
- b) Copies of contracts/memorandum of agreements between the permit holder and the associated collectors.
- c) Details of the permit holder's project(s) concerning the applied for formation, including projects undertaken by all students/postdoctoral fellows collecting under this permit.

9.8. For excavation in a locality the following additional details shall be provided:

- a) The locality must be clearly marked in the map (1:10 000 or 1:50 000) and coordinates and stratigraphy with clearly marked strata, in which to be excavated/collected, must be included.
- b) A locality, if not on SAHRIS already, must be created for the application.

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- c) A written consent of all landowners, whose land is affected by the proposed activity (including access roads). The HRA is not responsible for the actions of the permit holder.
- d) A proposal of locality maintenance, including how erosion control and stabilisation of the excavation pit will be done, e.g. filling in trenches, fencing the locality if necessary for the safety of persons and animals. The budget must allow for closure of the excavation locality to avoid erosion when abandoned.

10. Guidelines for Permits for Destruction

10.1. Permits to destroy palaeontological localities in the course of mining or development will be issued only after a survey (usually Phase 1 Impact Assessment⁵ and Phase 2 mitigation) has been done by a person whom SAHRA deems to be a qualified palaeontologist, and localities have been sampled to the satisfaction of the HRA. Practitioners should remind the developer to apply for this permit.

10.2. How to apply for this Permit

- For destruction of palaeontological resources in all provinces except the Western Cape (for excavation in the Western Cape please contact HWC at <http://www.hwc.org.za/making-an-application>), an application must be lodged on SAHRIS (<http://sahra.org.za/sahris>; how to: <http://www.sahra.org.za/content/quickstart-guide-making-palaeontological-permit-applications-sahris>) together with the following documentation:
- General information on the location, where excavation/collection will take place, including a map of the area with localities clearly marked, coordinates, magistrate district, and stratigraphy with strata, in which to be excavated/collected, clearly marked.
- A locality, if not on SAHRIS already, must be created for the application.
- The Phase 1 Impact Assessment and Phase 2 Mitigation Assessment.

⁵ See SG2.2 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports.

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- A written consent of all landowners, whose land is affected by the proposed activity (including access roads). The HRA is not responsible for the actions of the permit holder.
- Proof of payment of the permit application fee.

11. Guidelines for Permits for Destructive Sampling and Analysis

- 11.1. A specific permit must be obtained for sampling excavated or collected material for analysis (for bona fide research purposes).
- 11.2. In the case of samples taken from a collection, the permit should be applied for through the curator of the collection or local researcher and is generally given in the name of the person who is to do the work.
- 11.3. If the sampling and/or analysis are being done outside South Africa, an additional export permit must be applied for to SAHRA (section 12 in this document).
- 11.4. Areas damaged must be left as is (do not patch up/repair) and left-over samples, thin sections etc. must be returned to the institution, at which the mother material is stored.
- 11.5. The hosting institution and SAHRA should be provided with published results.
- 11.6. A final permit report (section 15 in this document) must be submitted within a year of the lapse of the permit.
- 11.7. **How to apply for this Permit**

- For sampling/analysis of palaeontological resources in all provinces except the Western Cape (for excavation in the Western Cape please contact HWC: <http://www.hwc.org.za/making-an-application>), an application must be lodged on SAHRIS (<http://sahra.org.za/sahris>; how to: <http://www.sahra.org.za/content/quickstart-guide-making-palaeontological-permit-applications-sahris>) together with the following documentation:

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- A list of all participants including names, affiliation and contact details, and how each participant is involved.
- For each fossil an object ID must be created on SAHRIS and should be linked to the locality it was found at. The locality must be created on SAHRIS if not present already.
- Name and address of the museum/university department that currently hosts the object(s).
- Name and address of the facility/university department where the analysis will be done.
- A letter of consent by the museum authority or university department, in which the object is accessioned, must be submitted with the application. This should include the name of the researcher that loans it, accession numbers of the fossils and time frame of the loan.
- Detailed information on the project and methodology used, including expected outcomes. This should be uploaded to the section "Extended motivation (for Heritage Officers only)" if confidential.
- A statement if the analysis is destructive, and if yes, what is the impact (e.g. coating)?
- A statement that the method used is the most feasible method to reach the expected outcomes and if and how it has generally proved to be successful.
- Proof of payment of the permit fee.
- Where sampling is to be done overseas, an export permit (section 12 in this document) from SAHRA is required

12. Guidelines for Permits for Temporary and Permanent Export

12.1. In assessing whether or not material may be exported, SAHRA assesses applications in terms of:

- their scientific value and rarity,
- the reasons for which export permits are requested, and
- the arrangements made for the safety and transport of the specimens.

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- 12.2. If objects from the Eastern Cape, KwaZulu Natal or Western Cape Provinces are being exported for destructive/invasive analysis abroad, a destructive analysis permit must be obtained from the relevant PHRA and submitted with the export permit application to SAHRA.
- 12.3. Temporary export permits are usually issued for one year, unless the policy of the lending institution states otherwise, and all permits are free of charge.
- 12.4. Export permits should be applied for by the curator of the collection at the scientific institution housing the material.
- 12.5. The material to be exported may be sent only to researchers at recognised scientific institutions abroad. It may not be sold or transferred to another institution without prior permission from SAHRA.
- 12.6. The cost of sending the material abroad is borne by the South African institution or the person who borrows the material and the cost of returning it is borne by the person to whom the material is sent unless otherwise designated by SAHRA. Applicants must ensure that the recipient is aware of the fact that he/she is responsible for the cost of returning the specimen(s) in the time stipulated.
- 12.7. It is expected that palaeontological heritage objects will be exported and returned, by the due date, in the hand luggage (if size allows) of the visiting scientist involved in the work. If they are to be sent with another visiting researcher who can travel at a convenient time, SAHRA must be notified ahead of time, giving their name and credentials that indicate their understanding of the significance of the package. Insured transport via courier is accepted, postal delivery of objects is not.
- 12.8. Where scientific samples are sent overseas for analysis, the curator or SAHRA may ask for suitable records of the material to be made. In general, half the sample should be left in South Africa and residues returned to the repository.

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12.9. Casts should be made and photographs taken or drawings or 3D-scans showing morphology should be made of significant original specimens before an invasive analysis is performed so that no morphological information is lost. Records should be kept indicating where sections are made.

12.10. Export permit applications for specimens for chemical analysis must state:

- how much destruction the analysis will involve;
- whether there will be anything left to return to the museum afterwards;
- whether the overall structure of the specimen will be preserved.

12.11. If the answers to the last two questions are 'no', then the application should state just how much material is being sacrificed and how many specimens are there from the locality.

12.12. Where a heritage object of extraordinary value is sent overseas for display, the institution borrowing it should (at the expense of that institution) arrange for it to be accompanied (and fetched) by the curator (or qualified courier), and a copy of the loan agreement between the institutions (or, initially, a draft thereof) should be submitted with the permit application, indicating conditions of and security arrangements for display and storage.

12.13. Safety measures taken for the protection and conservation of the material and (in the case of temporary export) its return to South Africa must include the following:

- a) All material must be clearly marked with the accession number of the scientific institution to which it belongs;
- b) All packets and boxes containing the material to be exported must include the accession number, the name of the locality and the name and address of the institution to which it belongs;
- c) All material must be securely packed to ensure that specimens are not damaged during transit;

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- d) Where specimens require specialised conservation, detailed instructions must accompany the material during transport.

12.14. SAHRA must be notified when the material is returned.

12.15. Hard copies of all publications and theses resulting from the description or analysis of exported materials by scientists abroad and locally must be posted to the National Library at SAHRA.

12.16. A permit report must be submitted to SAHRA via email within one year of the lapse of the permit.

12.17. How to apply for a Temporary Export Permit

- For export of palaeontological resources from all provinces, an application must be lodged on SAHRIS (<http://sahra.org.za/sahris>; how to: <http://www.sahra.org.za/content/quickstart-guide-making-palaeontological-permit-applications-sahris>) together with the following documentation:
- List of all participants (including name, affiliation, phone number, email address) and their involvement.
- Name and address of the facility, at which the fossil is being analysed.
- Name and address of the museum/university department that currently hosts the fossil.
- Names of the responsible person(s) during transport and while the fossil is at the facility for analysis.
- Period/time frame during which the fossil will be outside the country.
- An Object ID must be created on SAHRIS or, if one already exists, it must be linked to the application. This should contain detailed information on the fossil, e.g., locality, formation, age, complete/partial, brittle.
- Detailed information on the research project behind it & methodology including expected outcomes (i.e., the reason for export).
- Letter of consent by the institution that currently hosts the specimen that the specimen may be used as proposed and be returned in good condition. This letter

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for

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should include the name of the researcher that loans it, accession numbers of the fossils and time frame of the loan.

- Should there be any damage/destructive analysis (e.g., coating for higher resolution) undertaken, this needs to be stated in detail.
- Statement why this study cannot be done in South Africa.
- The destructive sampling permit from the relevant PHRA if the object is from the Eastern Cape, KwaZulu Natal or Western Cape Province.

12.18. Temporary Export is permitted only:

- a) If the material cannot be studied or analysed in South Africa because the necessary technical equipment, comparative collection or expertise is not available here;
- b) If the specimen is not rare or of unusual scientific value;
- c) If the material is sent to a recognised scientific institution;
- d) If the applicant undertakes to ensure the return of the material within the time period stipulated by the permit.

12.19. How to apply for a Permanent Export Permit

- For export of palaeontological resources from all provinces, an application must be lodged on SAHRIS (<http://sahra.org.za/sahris>; how to: <http://www.sahra.org.za/content/quickstart-guide-making-palaeontological-permit-applications-sahris>) together with the following documentation:
- List of participants (including name, affiliation, phone number, email address) and their involvement.
- Name and address of the facility, at which the object is being held permanently.
- Name and address of the museum/university department that currently hosts the object.
- Names of the responsible person(s) during transport and while the fossil is at the receiving facility.
- An Object ID must be created on SAHRIS or, if one already exists, it must be linked to the application. This should contain detailed information on the fossil, e.g., locality, formation, age, complete/partial, brittle.

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- Letter of consent by the institution that currently hosts the specimen that the specimen may be exported permanently. This letter should include the name of the researcher that exports it, accession numbers of the fossils and purpose of the export (e.g., destructive analysis, exhibition, educational).
- Should there be any damage/destructive analysis (e.g., coating for higher resolution) undertaken, this needs to be stated in detail.
- Statement why the object is being exported permanently.

12.20. Permanent Export is permitted only:

- a) For specimens that are relatively common and of which there are other examples in South African scientific institutions;
- b) To recognised scientific institutions abroad for research or display purposes and not for sale;
- c) For material that is to be destroyed during analysis that cannot be done in South Africa, for example for chemical testing or specialised dating techniques. In such cases, more than half of each specimen must be retained in South Africa.

13. Standards of Collection and Recording

13.1. The permit holder is at all times responsible for the collection and excavation and the objects recovered and he/she or his/her authorised representative, whose name shall be furnished to the SAHRA, must be present at all times during the work.

13.2. Good scientific standards include keeping destruction/damage of fossils and immediate surroundings to a minimum.

13.3. Largely destructive/invasive techniques such as blasting require a special permit or special mention in a permit by SAHRA. Standard excavation tools include hammer, chisel, brush, spade; rock saw only if all other options failed.

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- 13.4. Material must be stored using containers or bags and labelled appropriately (if possible, field name/number, locality name, formation name, layer, GPS coordinates).
- 13.5. Material must be stabilised and suitably protected for transport, e.g. by using appropriate glue or plaster of paris. Waste and equipment must be removed from the locality at the end of excavations.
- 13.6. If working in one locality, the permit holder must:
- a) Supervise all excavation, collecting and casting;
 - b) Produce field notes recording the locality, surrounding lithology and the stratigraphic position with diagrams and descriptions detailing each stage of the process, and record the position of the material via GPS;
 - c) Produce a locality map including an accurate, measured diagram of the locality on which the positions of all excavations and significant fossils are marked and notes of the geographical co-ordinates of the fossils;
 - d) Make a detailed photographic record of the locality and work in progress and take photographs of any significant fossils, trace fossils or trackways recovered in situ;
 - e) Lodge with the repository copies of field note books, surveying records, maps and photographic records. The format for curation and boxing must also be arranged with the repository;
 - f) Adhere to additional conditions requested by the institution curating the excavated material;
 - g) Where there is general access of the public, make appropriate effort to arrange for the protection (e.g., boardwalks, fences) and interpretation (signage or pamphlets) of the locality. The Managing Authority or SAHRA can be contacted for details;
 - h) The budget must include available funding for filling/restoration of the localities after excavation if necessary.

14. Standards of Curation

- 14.1. The responsible heritage resources authority must, in terms of the NHRA (s.35), "ensure that [...] palaeontological material and meteorites which are excavated or

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collected in terms of a permit are lodged with a museum or other public institution that has a collection policy acceptable to the heritage resources authority and may in so doing establish such terms and conditions as it sees fit for the conservation of such objects”⁶.

14.2. The permit holder must make a prior agreement with a recognised museum or university department, which has an established palaeontological collection, a curator and a collections management policy that is approved by SAHRA.

14.3. The name of this repository will appear in the permit conditions and the material will become the ‘property’ of the said institution. The HRA must be consulted before any such material is moved to a different repository.

- a) Must have a written Collections Management Policy that covers policy and procedures on acquisition, processing of finds, labelling, packaging, boxing, documentation, locality recording, storage management, conservation and inventory control;
- b) Must organise the collection in an accessible form that renders the material and data archive available for critical examination;
- c) Must accession material as soon as possible and must cross-reference it to the locality report;
- d) Must give researchers access to the material at all reasonable times.

14.4. At the start of a project, formal agreement must be reached between researcher and collaborating institution as to financial and other requirements and responsibilities for curation (including labelling, packaging and boxing) and documentation. These issues should be addressed in the institution’s collections management policy.

14.5. Any pictorial recording (photography, tracings, etc.) made as part of the survey must be marked and cross-referenced to the catalogue.

⁶ See SG5.1 Guidelines to Ethical and Curatorial Considerations for Accredited Repositories for Archaeological and Palaeontological Material.

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14.6. Full copies of the field note books, surveying records, maps (and photographic records) must be lodged with the repository, as soon as the permit expires or at a date arranged with the repository (a moratorium can be placed on access to this material to allow the permit holder time to publish his or her results).

15. Permit Reports

15.1. For all permits, the permit holder is required to email to the relevant SAHRA Heritage Officer (Archaeology, Palaeontology and Meteorites Unit) a final permit report within one year of the lapse of the permit, in fulfilment of the conditions under which the permit has been issued. For long-term permits, i.e. for excavation/collection, additional annual permit reports must be submitted to SAHRA each year after the permit was issued. Permit report templates should be used, which may be downloaded from SAHRIS.

15.2. The purpose of the permit report is to provide SAHRA with an accurate record of work that has been undertaken in fulfilment of the conditions of the permit. In terms of section 13 (2) (b) SAHRA must maintain a National Heritage Resources Library, including documentary and other records relating to the national estate. The following principles shall apply:

- a) SAHRA may forego the request for a final permit report for research if the permit holder applies for a renewal and the interim reports are compiled to the satisfaction of the heritage authority. A final report shall be due after the second cycle of a renewal;
- b) In instances of failure to submit reports, submission of sub-standard reports or where SAHRA or the HRA deems the work being carried out in the fulfilment of the permit to not meet appropriate scientific standards, SAHRA or the HRA may cancel existing permits or refuse to issue future permits to the permit holder;

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- c) Access to permit reports may be made available on request three years after the permit has expired, allowing for adequate time for publication, and only in instances where the purpose for the use of such reports has been adequately motivated;
- d) The permit report must provide a statement about the location of excavated material and its state of curation, or if adequate provisions have been made for its storage and accessibility.

15.3. Permit holders are requested to remember that, in terms of the permit conditions, copies of all publications, reports and theses relating to material acquired in terms of the permit, even where this is done by other researchers or students, must be emailed/couriered to SAHRA for the national heritage library (Head of Library, National Heritage Library, 111 Harrington Street, Cape Town, 8001).

16. Monitoring

16.1. The Heritage Resources Authority:

- a) shall monitor work done in terms of permits issued for excavation, removal, etc.;
- b) may cancel, refuse to issue a permit or refuse to renew a permit if conditions are not met or if it has reason to believe that the applicant is not qualified or experienced enough to do the work;

16.2. SAHRA reserves the right to submit unpublished reports if it is not satisfied that the information has been adequately reported;





16.3. May refuse further permits if:

- analysis of material previously recovered is incomplete or unsatisfactory.

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Recommended by HRM Executive	Mr D. Sibayi	Recommended by Accounting Officer	Ms V. Baduza Chief Executive Officer
Signature		Signature	
Date	21/02/15	Date	
Endorsed By	Dr N. Ndlovu HRM Sub-Committee Chair	Approved by Accounting Authority	Mr F. Makhanya Council Chairperson
Signature		Signature	
Date		Date	

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