

DRAFT

**PROPOSED ELECTRICAL LINE OF 2 X 400 kV WHICH RUNS FROM
ARIES SUBSTATION NEAR KENHARDT TO UPINGTON
SUBSTATION NEAR UPINGTON, IN THE KAI GARIB AND KHARA
HAIS LOCAL MUNICIPALITY, MGCAWU DISTRICT MUNICIPALITY,
NORTHERN CAPE PROVINCE**

HERITAGE CONSERVATION MANAGEMENT PLAN

Date: 30August 2024

PREPARED BY:

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PREPARED FOR:

ESKOM HOLDINGS SOC LTD



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ABBREVIATIONS

BP	Before Present
CFP	Chance Finds Procedure
CRM	Cultural Resources Management
DAU	Developments Application Unit
DFFE	Department of Forestry Fisheries and Environment
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIA	Early Iron Age
EMP	Environmental Management Programme
GPS	Global Positioning Systems
HIA	Heritage Impact Assessment
LSA	Late Stone Age
LIA	Later Iron Age
MSA	Middle Stone Age
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
SAHRA	South African Heritage Resources Agency
WP	Waypoint

EXECUTIVE SUMMARY

1. This document is Conservation Management Plan prepared for the Environmental Control Officer (ECO) who will monitor the construction of the powerline for the Aries to Uppington 400kV powerline.
2. The objectives of the Conservation Management Plan are, as possible, to implement the recommendations of previous heritage impact studies and findings of the verification exercise summarised in the table below:

3. Recommendations of the Conservation Management Plan

	KEY ISSUES	ACTION
1	The kopje (74 m from pillar 43) should be indicated on development plans and avoided during construction.	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
2	The area at Pillar 176 – 177 is sensitive (Waypoint 6) and should be avoided for stringing and construction.	ECO Monitoring
3	Pylon excavations must be monitored and could require further mitigation at waypoint 383 (Pillar 177 to 179).	ECO Monitoring
4	Pillars 219 should be micro sited to avoid the Stone Age features at Waypoint 3431.	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
5	Pillars 260 – 261 should be micro sited to avoid the Stone Age features at Waypoints 3461	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
6	Pillar 299 should be micro sited to avoid the Stone Age features At waypoint 3481	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
7	Graves and burial sites (as well as potential graves until proven otherwise) should be avoided with a 30 m buffer zone and as such Waypoint 7, 11, 3491,	Screening excavations recommended. Relocation if human remains are found
8	Recorded heritage features should be indicated on development plans and construction crews should be made aware of expected resources and applicable mitigation measures.	ECO, EMPr
9	The study area should be monitored by the ECO during construction to implementation the Chance Find Procedure for the project.	ECO, EMPr

1. INTRODUCTION

This document is Conservation Management Plan prepared for the Environmental Control Officer (ECO) who will monitor the construction of the towers for the Aries to Uppington 400kV powerline. It is necessary to prepare a manual for the treatment of heritage resources which have been identified as requiring intervention to mitigate the impact of the development as well as those chance finds not seen during the previous heritage studies.

1.2. Definition of Heritage

Heritage is a new and evolving concept which has entered social and political discourse in contemporary societies. A simple definition of heritage is property that is or may be inherited.¹ In heritage practice heritage value has been intrinsically linked with conservation. The emphasis on heritage and conservation is predicated on the need to pass heritage from one generation to the next. Ownership of heritage is vested in individuals or communities who think that heritage is important to them.² Heritage thus lies in the public domain, and there are always contestations on what should and what should not be nominated as heritage.

In current thinking heritage is multi-faceted, with its values located in the context of the broader environment which is affected by interaction with communities, which live and work in or around it. In South Africa heritage is defined in the broad sense set out above and the concept of the “National Estate”. There is a comprehensive and ‘integrated system for the identification, assessment and management’ of the ‘National Estate’ as per the National Heritage Resources Act (NHRA) No. 25 of 1999.

1.3. Purpose of the Conservation Management Plan

Generically, Conservation Management Plans are prepared with the followings aims; to:-

- (i) Develop and implement a sound management system based on the respect of best practices in the conservation of cultural heritage sites;

¹ Harrison 2010: Understanding the Politics of Heritage. Manchester: Manchester University Press.

² Italics is for emphasis.

- (ii) Set out priorities for sustainable conservation and development of heritage resources;
- (iii) Encourage research to shed more light on the history of the resources as well as well as the best means of preserving them;
- (iv) Create local and national awareness, and building an understanding of the conservation planning process among stakeholders;
- (v) Encourage partnership initiatives and collaboration with key stakeholders such as local communities, government departments, and research institutions;
- (vi) Develop educational, cultural and visitation programmes that will create an appreciation among the public for the value of the heritage resources (especially graves), thereby reinforcing protection measures; and
- (vii) Develop an interpretation framework to give a coherent narrative for the heritage (the graves and burial grounds) within the context of the particular landscape, local and national history.

2. NATURE OF THE PROPOSED DEVELOPMENT

Eskom intends to construct pylons to carry 400kV powerlines over 145km from the Aries substation west of Kenhardt to the Upington Solar PV plant. The project entails the construction of pylons at 300 positions. A heritage impact assessment study established the presence of heritage resources at or near seven (7) tower positions which required a mitigation plan. The following activities had the potential to damage or destroy the identified heritage resources:

- Grubbing and striping of the topsoil to prepare the footprint of a tower measuring 20m x 20m.
- Opening of temporary roads for the transportation of construction materials, equipment and personnel.
- Establishment of temporary camps and offices.
- Stringing of transmission cables.

3. LEGAL FRAMEWORK

The following pieces of legislation are of important application in Heritage Management:

3.2. The Constitution of South Africa (No 108 of 1996)

The Constitution of the Republic of South Africa Act (No 108 /1996) is the supreme law and the nucleus of all legislation in South Africa. Within the Constitution there is a Bill of Rights which recognises that heritage and the environment should be protected for present and future generations by preventing pollution, promoting conservation and practising sustainable development (Section 24). Section 31 guarantees the rights of cultural, religious and linguistic communities:

- (1) Persons belonging to a cultural, religious or linguistic community may not be denied the right, with other members of that community—*
 - (a) to enjoy their culture, practise their religion and use their language; and*
 - (b) to form, join and maintain cultural, religious and linguistic associations and other organs of civil society.*

3.3. The National Heritage Resources Act (No 25 of 1999)

Although an IHMP may be discretionary, it has been recommended as a matter of due diligence in terms of Section 47(3) of the National Heritage Resources Act (NHRA).

Section 38 of the NHRA sets out measures that must be taken to ensure as part of sustainable environmental conservation that major developments including infrastructure and mining do not result in the alteration or destruction of heritage resources, and that where negative impacts are likely to occur appropriate interventions are taken to reduce severity of the impacts.

In Section 3(2)(g) of the NHRA archaeological and historical graves are among the many specific typologies of heritage resources defined as National Estate recognizing their cultural significance or other special value for the present communities and for future generations. Graves and burial grounds may occur in various forms including:

- (i) ancestral graves;*
- (ii) royal graves and graves of traditional leaders;*
- (iii) graves of victims of conflict;*
- (iv) graves of individuals designated by the Minister by notice in the Gazette;*
- (v) historical graves and cemeteries; and*
- (vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);*

Section 36 of the NHRA prohibits alteration or damage of specific types of graves and burial grounds: Graves older than 60 years and graves of victims of climate. In general application it provides for the protection of all categories of graves as defined in Section 3(2) (g) outlined above.

3.4. The Vermillion Accord on Human Remains (1989)

From the mid-20th century there has been escalating advocacy and protests during international conferences concerning the treatment of graves and human remains prompting a policy pronouncement by the World Archaeological Congress at a conference held in Dakota (USA) in 1989. The **World Archaeological Congress Vermillion Accord on Archaeological Ethics and the Treatment of the Dead (1989)** recommended that decisions made on graves/human remains must be informed by consultation with communities who by association might have strong feelings for protection *in situ* and may argue that a development project is better moved to an alternative site.

1. Respect for the mortal remains of the dead shall be accorded to all irrespective of origin, race, religion, nationality, custom and tradition.
2. Respect for the wishes of the dead concerning disposition shall be accorded whenever possible, reasonable and lawful, when they are known or can be reasonably inferred.
3. Respect for the wishes of the local community and of relatives or guardians of the dead shall be accorded whenever possible, reasonable and lawful.
4. Respect for the scientific research value of skeletal, mummified and other human remains (including fossil hominids) shall be accorded when such value is demonstrated to exist.
5. Agreement on the disposition of fossil, skeletal, mummified and other remains shall be reached by negotiation on the basis of mutual respect for the legitimate concerns of communities for the proper disposition of their ancestors, as well as the legitimate concerns of science and education.
6. The express recognition that the concerns of various ethnic groups, as well as those of science are legitimate and to be respected, will permit acceptable agreements to be reached and honoured.

3.5. The National Environmental Management Act (No 107 of 1998)

Section 2(2) on principles of sustainable environmental management urges sensitivity to the welfare of communities regarding their physical psychological, developmental, cultural and social interests. Development must be socially, environmentally and economically sustainable, which requires that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied.

4. APPROACH AND METHODOLOGY

This Section shows how the Conservation Management Plan was prepared. The approach and methodology are aligned to the aims of the project and the intended outcomes.

4.2. Literature Survey

The starting point in a Conservation Management Planning is to gain a broader understanding of the area of study and conservation management planning theory through a literature survey. A literature study is imperative to all types of research to establish context. A wide range of materials including relevant pieces of legislation, local and international policy documents provide the planning framework for this CMP. The primary source of information is the Heritage Impact Assessment studies that have been undertaken. The key findings and recommendations in the report are summarised in Table 1 below³:

Table 1: Recommendation of Previous Heritage Studies

Tower	Waypoint	Description	Significance	Mitigation
43	4	Archaeological Stone Age site (at kopje)	Low Significance GP C	No Mitigation required - the kopje should be indicated on development plans and avoided during construction
176 - 177	6	Archaeological site - LSA and MSA site	Medium Significance GP B	The area is sensitive and should be avoided for stringing and construction

³ Van Der Walt, J. 2022. Heritage Walk-Down Report for the Approved Aries - Upington 400kv Line, Northern Cape Province, pages 30-31.

177 - 179	383	High density Background scatter - MSA and LSA	Low to Medium Significance GP B	Pylon excavations must be monitored and could require further mitigation
177 - 179	386	Background scatter - MSA and LSA	Low to Medium Significance GP B	Pylon excavations must be monitored and could require further mitigation
219	3431	High density MSA artefacts - avoid	Low to Medium Significance -GP B	Demarcate and avoid the rocky outcrop
260 - 261	3461	Rocky outcrop - LSA scatter	Low to Medium Significance -GP B	Avoid the area during construction
299	3481	Seasonal water MSA/ LSA scatter - Avoid	High Significance GP A	Micro site Pillar 299 and avoid the area
299	3491	Potential Grave	High Significance GP A	Micro site Pillar 299 and avoid the area
299	3501	Potential Grave	High Significance GP A	Micro site Pillar 299 and avoid the area

4.3. Stakeholder engagement

The key stakeholders are the landowners on whose land the flagged towers are situated. See the Table Below. A visit schedule was prepared and landowners were contacted in advance and access arranged. In two instances the landowners had the courtesy to guide us to the tower positions (Table 2).

Table 2: Landowners and the sensitive areas in their respective properties

Tower	Landowner	Waypoint	Description	Significance	Mitigation
43	DE TUIN ZUID 163 portion 2: CHRIS JORDAAN TRUST (JOHN RICHARD JORDAAN -	4	Archaeological Stone Age site (at kopje)	Low Significance GP C	No Mitigation required - the kopje should be indicated on development plans and avoided during construction
176 – 177	Erf 1486 Kakamas South Settlement: FRANCOIS BRUWER	6 Access granted	Archaeological site - LSA and MSA site	Medium Significance GP B	The area is sensitive and should be avoided for stringing and construction
177 – 179	Erf 1486 Kakamas South Settlement: FRANCOIS BRUWER	383 Access granted	High density Background scatter - MSA and LSA	Low to Medium Significance GP B	Pylon excavations must be monitored and could require further mitigation
177 – 179	Erf 1486 Kakamas South Settlement: FRANCOIS BRUWER	386 Access granted	Background scatter - MSA and LSA	Low to Medium Significance GP B	Pylon excavations must be monitored and could require further mitigation
219	(PLAAS 595 Rem: JOHANNES DANIEL MOLLER (purchased by ZZB - Charlse Calitz -	3431 See him first on Plot 6677 Kakamas	High density MSA artefacts - avoid	Low to Medium Significance -GP B	Demarcate and avoid the rocky outcrop

		10km from Keimoes			
260 - 261	PLAAS 616 Rem: HERMANUS D. HANEKOM & ELIZABETH S. HANEKOM	3461	Rocky outcrop - LSA scatter	Low to Medium Significance -GP B	Avoid the area during construction
299	(DYASON'S KLIP 454 portion 0: THEUNIS BOTHU DU TOIT	3481	Seasonal water MSA/ LSA scatter - Avoid	High Significance GP A	Micro site Pillar 299 and avoid the area
299	(DYASON'S KLIP 454 portion 0: THEUNIS BOTHU DU TOIT	3491	Potential Grave	High Significance GP A	Micro site Pillar 299 and avoid the area
299	(DYASON'S KLIP 454 portion 0: THEUNIS BOTHU DU TOIT	3501	Potential Grave	High Significance GP A	Micro site Pillar 299 and avoid the area

In the background there are institutional stakeholders with a vested interest in compliance and alignment of the project with local and regional developmental goals (see Table 4).

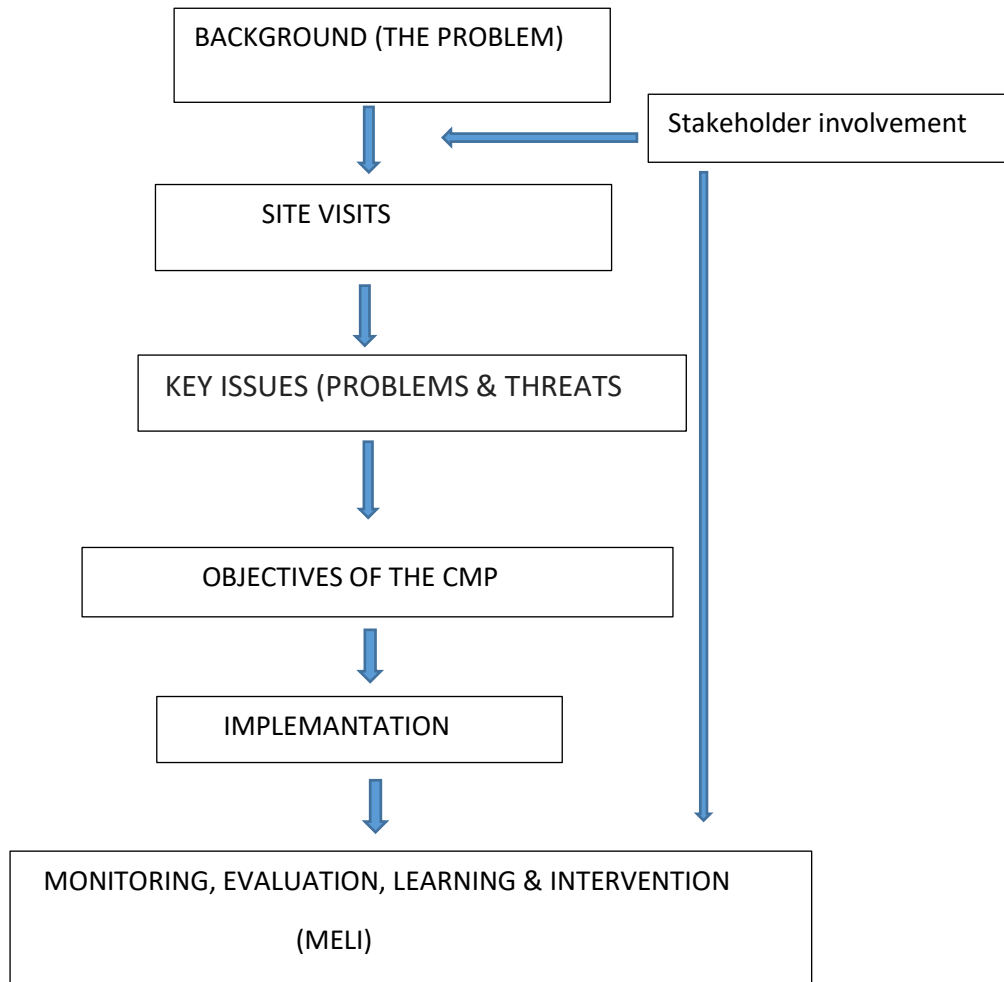
Table 3: Institutional Stakeholders

INSTITUTIONAL STAKEHOLDERS	STATUS
Department of Mineral Resources	Government, parent Department
Department of Environmental Affairs	Government, statutory compliance
SAHRA	Government, statutory compliance
Dawid Kluiper Local Municipality	Municipal regulations

A full list of private/individual stakeholders interested and affected parties, the majority of which are landowners/commercial farmers is annexed to the CMP.

4.4. Process Flow

The process is summarised in the following Flow Chart:



5. KEY ISSUES IN THE PREVIOUS HERITAGE IMPACT STUDY AND OBJECTIVES OF THE CMP

The objectives of the Conservation Management Plan are, as possible, to implement the recommendations of previous heritage impact studies summarised in the table below:⁴

⁴ Van Der Walt, J. 2022. Heritage Walk-Down Report for the Approved Aries - Uppington 400kv Line, Northern Cape Province, page 5.

Table 4: Recommendations in the Previous Heritage Studies

	KEY ISSUES	ACTION IN THE CMP
1	The kopje (74 m from pillar 43) should be indicated on development plans and avoided during construction.	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
2	The area at Pillar 176 – 177 is sensitive (Waypoint 6) and should be avoided for stringing and construction.	CMP
3	Pylon excavations must be monitored and could require further mitigation at waypoint 383 (Pillar 177 to 179).	CMP
4	Pillars 219 should be micro sited to avoid the Stone Age features at Waypoint 3431.	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
5	Pillars 260 – 261 should be micro sited to avoid the Stone Age features at Waypoints 3461	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
6	Pillar 299 should be micro sited to avoid the Stone Age features At waypoint 3481	Boundary of MSA/LSA site demarcated. Tower excavations monitoring.
7	Graves and burial sites (as well as potential graves until proven otherwise) should be avoided with a 30 m buffer zone and as such Waypoint 7, 11, 3491,	Screening excavations recommended. Relocation if human remains are found
8	Recorded heritage features should be indicated on development plans and construction crews should be made aware of expected resources and applicable mitigation measures.	CMP, CFP
9	The study area should be monitored by the ECO during construction to implementation the Chance Find Procedure for the project.	CMP, CFP

6. CONSERVATION MANAGEMENT PLANNING SITE VISITS JULY 2024

Site visits after finalisation of tower positions were undertaken in Mid-July 2024. It was necessary for the preparation of the Conservation Management Plan to make a distinction between general heritage sensitivity along the servitude and findings on the actual tower positions. The recommendations above were therefore amended accordingly to show sensitivity along the servitude and on tower positions. The impact of the project in these two areas was expected to vary, with the excavation of towers leading to destruction of the any sites or relics in the footprint, whereas stringing (along the servitude) between towers was likely to, but not always, cause displacement of the artefacts.

During the site visit, boundaries of areas with extensive scatters of artefacts were demarcated for the engineers and construction crew to avoid disturbing these areas.

6.2. Sensitivity Verification and Final Recommendations

Table 5. Expected Impacts and Proposed Mitigation Measures

Tower	Tower Position	Servitude	Waypoint ⁵	Significance	Mitigation
43	MSA/LSA material	MSA/LSA material. Extensive scatter of MSA/LSA tools mostly quartz found on the southern foot of the hill. A modern chamber of cement built on top of the hill.	WP 4	Low to Medium Significance (IIIB)	The Kopje to be avoided. Boundary indicated. Tower excavations to be monitored.
176	1 stone tool found within the footprint of the Tower Position	Archaeological site - LSA and MSA site		Low Significance (IIIC)	Tower excavations to be monitored.
177	Nothing found within the footprint of the Tower		WP 6	WP6: Medium Significance (IIIC). In Servitude	Tower excavation to proceed without monitoring. WP6 to be avoided.
178	Low to medium density MSA/LSA found within the footprint of the Tower	High density Background scatter - MSA and LSA	WP 383 WP 386 178a 178b	Low to Medium Significance (IIIB)	Tower excavations must be monitored and could require further mitigation. Sensitive area demarcated, eastern area to be avoided. Caution advised around the tower.
179	Nothing found at within the footprint of the Tower.				Cleared for Tower Excavations.
219	Nothing found within the footprint of the Tower	High density MSA artefacts – avoid. Scatters of MSA/LSA tools found on the rocky outcrop immediately to the north	WP3431 219a 219b 219c 219d	Low to Medium Significance (IIIB)	Sensitive area demarcated. Tower micro-sites, excavations to be monitored

⁵ WP denotes Way Points from the previous heritage study (Van Der Walt, J. 2022). The other waypoints were recorded during the verification exercise in July 2024.

			219e		
260	Nothing found within the footprint of the Tower Position	Scatters of MSA/LSA tools found on the rocky outcrop immediately to the north of Tower 260	WP 3461 260a 260b	Low to Medium Significance (IIIB)	Sensitive area demarcated. Tower micro-sited, excavations to be monitored.
Tower Position 261	Nothing found within the footprint of the Tower Position	One tool found 33 m from the Tower Position	261a	Low significance (IIIC)	Cleared for tower excavations
299	Nothing found in the footprint of the Tower	Seasonal water MSA/ LSA scatter	WP 3481	High Significance (IIIA)	Sensitive area demarcated. Tower excavations to be monitored
		Potential Grave	WP 3491	High Significance (IIIB)	Screening excavations
		Potential Grave	WP 3501	High Significance (IIIB)	Screening excavations

6.3. Maps showing the sensitivity of Tower Positions and Servitude

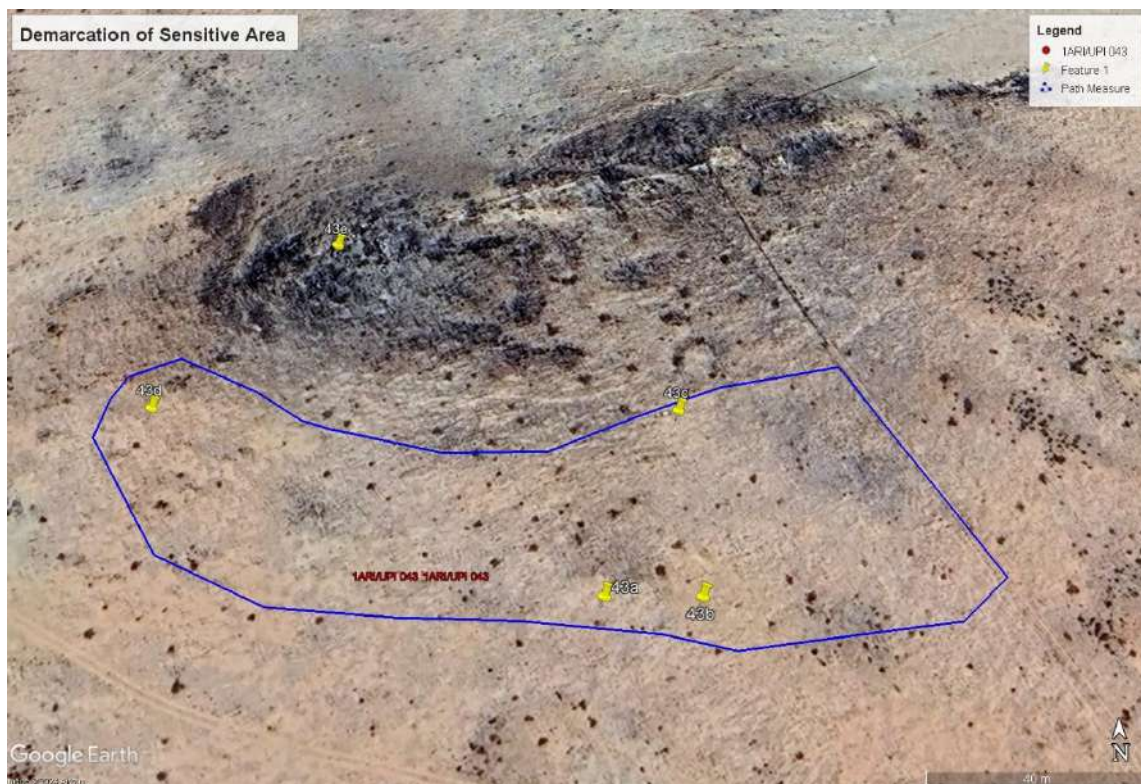


Figure 1: Tower 43, demarcation of sensitive area to be monitored, areas outside the tower footprint to be preserved.



Figure 2: Towers 176 – 177, few finds at Tower 176; nothing found at Tower 177. MSA/LSA at Waypoint (WP6) to be preserved.

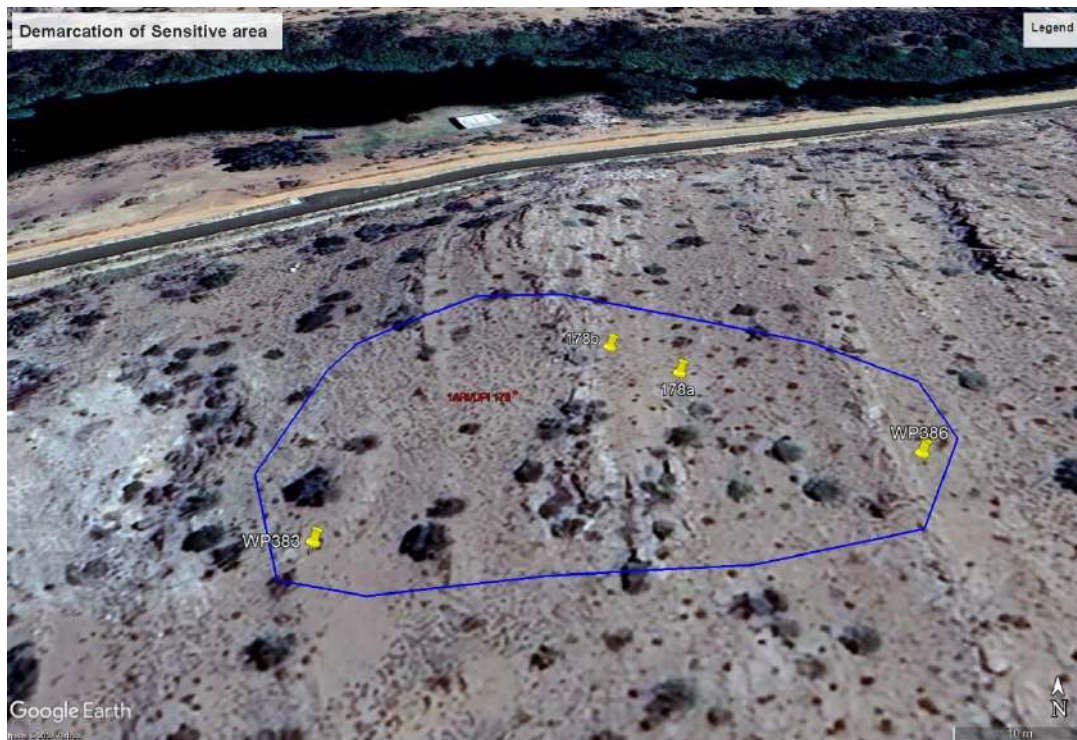


Figure 3: Tower 219, demarcation of sensitive area to be monitored, areas outside the tower footprint to be preserved.



Figure 4: Tower 178, demarcation of sensitive area to be monitored.

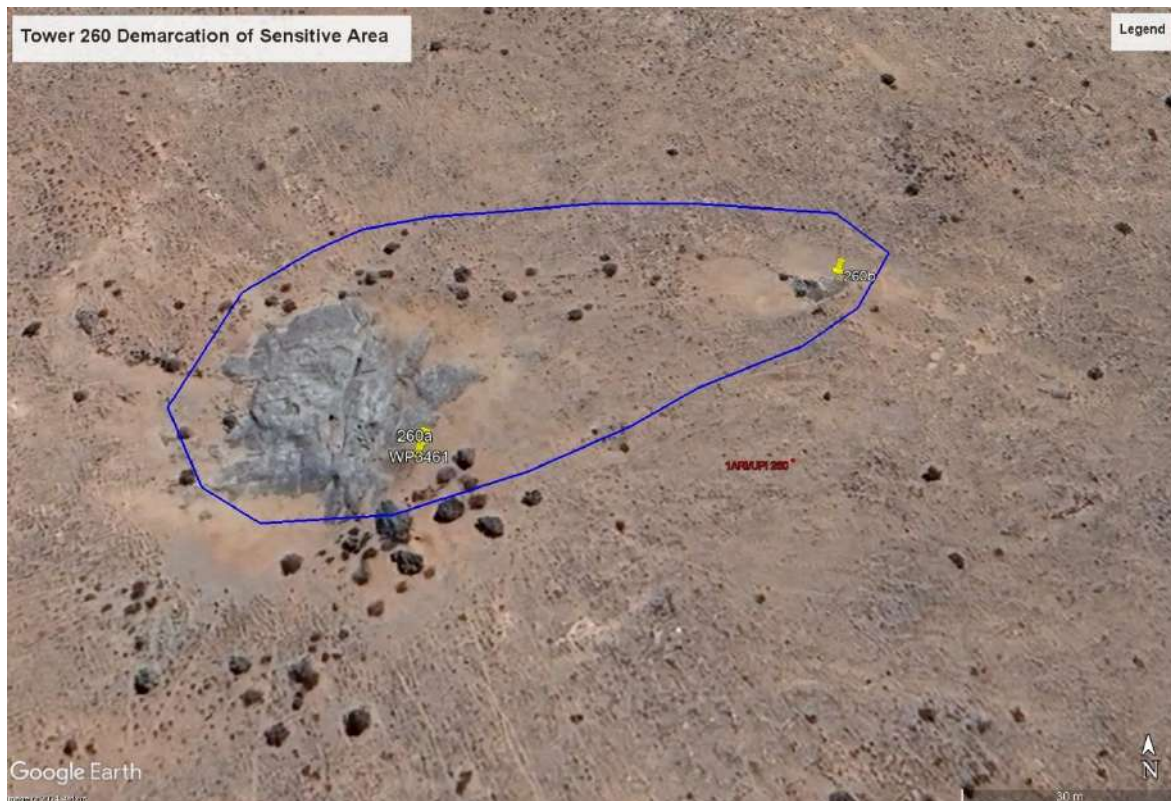


Figure 5: Tower 260, demarcation of sensitive area to be monitored, areas outside the tower footprint to be preserved.



Figure 6: Tower 261. One stone tool found near the Tower position. Construction to proceed.

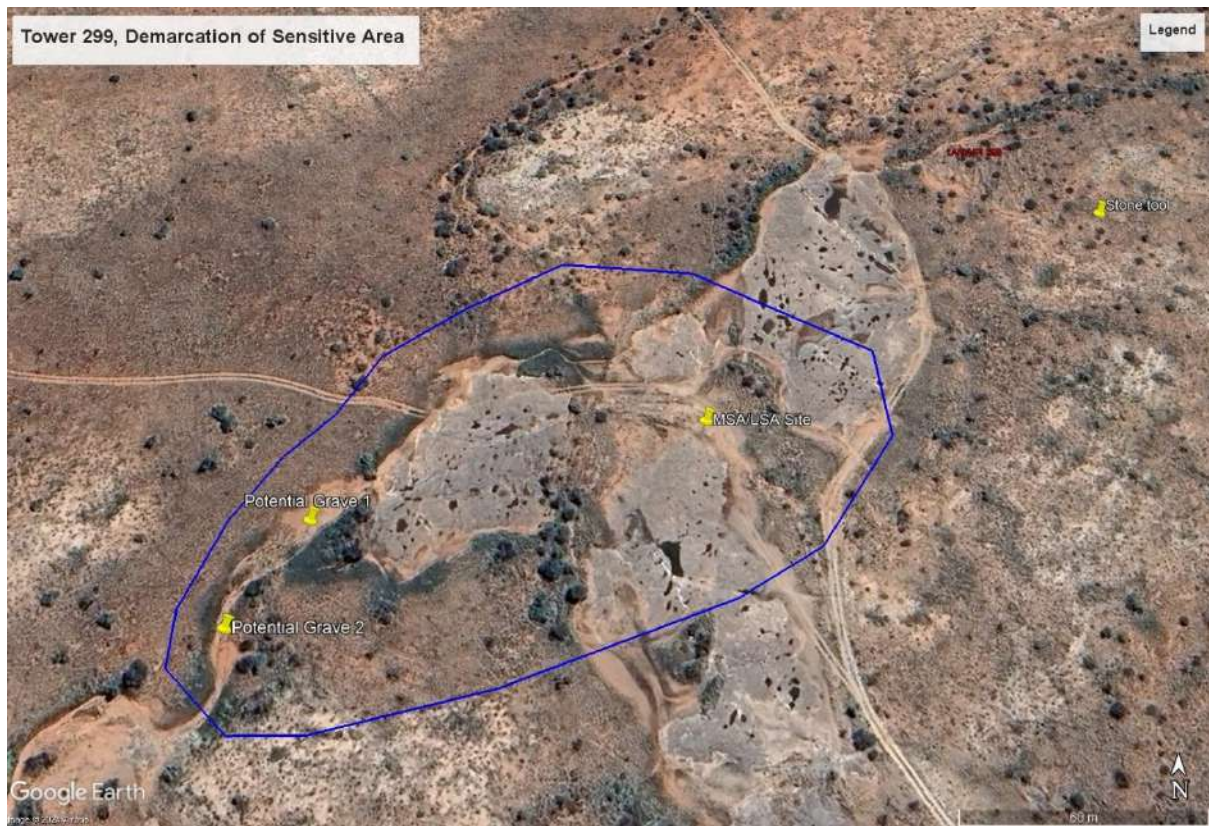




Figure 7: Tower 299, demarcation of sensitive area to be monitored, screening excavation of potential graves recommended.

6.4. Photo Illustrations of the Walk-Down Through Tower Positions



6.4.1. Tower 43 Overview



Several clusters of stone tools and flakes were observed and recorded indicating an extensive surface scatter of artefacts south of the hill encompassing the construction footprint of Tower 43.

Tower No	Coordinates		Finds in or Close to the Servitude
T43	29°19'59.50"S	20°46'28.30"E	Extensive scatter of MSA/LSA tools/flakes
			
			
DESCRIPTION: Extensive scatter of MSA/LSA tools mostly quartz found on the southern foot of the hill. A modern chamber of cement built on top of the hill.			


MITIGATION	Avoid southeastern part of the hill. Monitoring foundation excavations.
DATE	17 th July 2024


Tower No	Coordinates		Finds in or Close to the Servitude
T43a	29°19'59.50"S	20°46'29.00"E	Extensive scatter of MSA/LSA tools/flakes
			
			
DESCRIPTION: DESCRIPTION: Extensive scatter of MSA/LSA tools mostly quartz found on the southern foot of the hill. A modern chamber of cement built on top of the hill.			
MITIGATION	Avoid the southeastern part of the hill. Monitoring foundation excavations.		

DATE		17 th July 2024	
Tower No	Coordinates		Finds in or Close to the Servitude
T43b	29°19'58.20"S	20°46'28.90"E	Extensive scatter of MSA/LSA tools
 			
DESCRIPTION: DESCRIPTION: Extensive scatter of MSA/LSA tools mostly quartz found on the southern foot of the hill. A modern chamber of cement built on top of the hill.			
MITIGATION	Avoid the southeastern part of the hill. Monitoring foundation excavations.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T43c	29°19'58.50"S	20°46'28.30"E	Extensive scatter of MSA/LSA tools
 			
DESCRIPTION: DESCRIPTION: Extensive scatter of MSA/LSA tools mostly quartz found on the southern foot of the hill. A modern chamber of cement built on top of the hill.			
MITIGATION	Avoid the southeastern part of the hill. Monitoring foundation excavations.		
DATE	16 th July 2024		
Tower No	Coordinates		Finds in or Close to the Servitude

T43d	29°19'58.20"S	20°46'24.80"E	A modern cement structure, like a small chamber on the summit of the hill.
 			
DESCRIPTION: A modern cement structure like a small chamber on the summit of the hill. Made of bricks, stones and cement plaster.			
MITIGATION	Do not disturb.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T176	24°47'26.30"S	20°42'14.20"E	A small cleaver, scraper and flake found.
 			
DESCRIPTION: A small cleaver, scraper and flake found.			
MITIGATION	Construction to proceed with monitoring.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T177			Nothing found
			
DESCRIPTION: Quartz waste found, no tools.			
MITIGATION	Construction to proceed without monitoring.		
DATE	16 th July 2024		

6.4.2. Tower 178 Overview



Surface occurrence of MSA/LSA tools and flakes of low to medium density were observed and recorded.

Tower No	Coordinates		Finds in or Close to the Servitude
T178a	20°42'14.20"E	20°42'19.20"E	Extensive scatter of MSA/LSA tools/flakes at and around the construction footprint of the Tower.
<div> </div>			
DESCRIPTION: Extensive scatter of MSA/LSA tools/flakes at and around the construction footprint of the Tower.			
MITIGATION	As far as possible, avoid the area demarcated around the Tower position. Monitoring foundation excavations.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T178b	28°47'7.30"S	20°42'18.90"E	Extensive scatter of MSA/LSA tools/flakes at and around the construction footprint of the Tower.
 			
DESCRIPTION: Stone tools found, medium density			
MITIGATION	Monitoring foundation excavations.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T179	28°46'59.90"S	20°42'14.20"E	Sand /silt overburden on the floodplain. Nothing found.
			
DESCRIPTION: Sand /silt overburden on the floodplain. Nothing found.			
MITIGATION	Construction to proceed without monitoring.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T219a	28°41'6.80"S	20°43'10.70"E	A small quartz flake near Tower
			
			
DESCRIPTION: A small quartz flake near the Tower position.			
MITIGATION	An outlier. Insignificant.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T219b	28°41'5.90"S	20°43'9.20"E	A core
 			
DESCRIPTION: A core found in the outcrop area.			
MITIGATION	Area around the outcrop to be demarcated and avoided.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T219c	28°41'04.5"S	20°43'9.20"E	3 scrappers and 3 blades.
<div data-bbox="204 367 1120 1048">  </div> <div data-bbox="204 1068 1120 1753">  </div>			
DESCRIPTION: Medium density of stone tools found in the outcrop area.			
MITIGATION	Area around the outcrop to be demarcated and avoided.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T219d	28°41'5.20"S	20°43'8.70"E	Triangular scrapper and flakes.
			
DESCRIPTION: Medium density, stone tools in the outcrop area.			
MITIGATION	Area around the outcrop to be demarcated and avoided.		
DATE	16 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T260	28°38'50.90"S	20°54'18.30"E	Core and flakes/scrapers
			
			
DESCRIPTION: Low density MSA/LSA stone tools.			
MITIGATION	Area around the outcrop demarcated and to be avoided.		
DATE	18 th July 2024		


Tower No	Coordinates		Finds in or Close to the Servitude
T261	28°38'47.60"S	20°54'32.70"E	
			
			
DESCRIPTION: One stone tool found near the Tower position.			
MITIGATION	Foundations excavations to proceed without monitoring.		
DATE	18 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T299a	28°35'20.20"S	20°05'29.20"E	One stone tool near the Tower
 			
DESCRIPTION: One large scraper found near the Tower Position.			
MITIGATION	Foundation excavations to be monitored.		
DATE	18 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T299b	28°35'23.20"	21° 5'20.50"E	Low to medium density MSA/LSA tools
 			
DESCRIPTION: Low to medium density MSA/LSA tools found on edge of the outcrop.			
MITIGATION	Demarcated area to be avoided. Screening excavations of the potential graves recommended.		
DATE	18 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T299c	28°35'23.20"S	21° 5'20.20"E	One scraper.
 			
DESCRIPTION. One scraper found on the edge of the outcrop.			
MITIGATION	Demarcated area to be avoided. Screening excavations of the potential graves recommended.		
DATE	18 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T299d	28°35'23.44"S	21° 5'20.44"E	Potential Grave 1
			
DESCRIPTION. Potential grave on the edge of the outcrop.			
MITIGATION	Screening excavations of the potential graves recommended.		
DATE	18 th July 2024		

Tower No	Coordinates		Finds in or Close to the Servitude
T299e	28°35'24.41"S	21° 5'19.74"E	Potential Grave 2
			
DESCRIPTION. Potential grave on the edge of the outcrop.			
MITIGATION	Screening excavations of the potential graves recommended.		
DATE	18 th July 2024		

6.5. Risk Assessment

Risk assessment is general appraisal of factors that are likely to affect the implementation of the CMP. Tower Positions 176, 177, 178, 179 are in a difficult terrain close to the banks of the Orange River. It is noted that this challenge will be faced by all the multidisciplinary crew involved in the construction project.

A Chance Finds Procedure (CPF) has been prepared to mitigate the possibility of accidental finds during construction. A CPF is a protocol for curating chance discoveries.

7. IMPLEMENTATION OF THE CMP

The Conservation Management Plan will be implemented by the Environmental Control Officer (ECO). The ECO has the responsibility to raise awareness among the construction crews on the aims of the Management Plan. The CMP is also a Monitoring Tool used by the ECO to ensure the protection of Heritage Resources in the footprint of the development.

8. MONITORING AND EVALUATION

The ECO will use CMP for Monitoring, Evaluation, Learning and Intervention (MELI). Monitoring is an ongoing process of collecting evidence to show progress or lack of it. Evaluation is appraisal of the degree of success in the implementation of the CMP. During evaluation it is important to consider unforeseen developments which might turn out to be critical in influencing outcomes when compared to those that had been anticipated. Learning refers to lessons and insights that accrue from the results of the monitoring and evaluation. Intervention is appropriate evidence-based action that must be taken to overcome obstacles or challenges faced during the implementation of the CMP. The MELI is a system of proactive and adaptive management which allows custom variation of the CMP to make sure that its objectives can be achieved with changing circumstances.

9. REFERENCES

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