

**DESKTOP HERITAGE IMPACT ASSESSMENT OF THE  
PROPOSED MULILO NEWCASTLE WIND POWER BORROW  
PITS**

**FOR GREENMINED ENVIRONMENTAL**

**DATE: 24 OCTOBER 2024**

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## Abbreviations

EIA	Early Iron Age
ESA	Early Stone Age
HIA	Heritage Impact Assessment
HP	Historical Period
IIA	Indeterminate Iron Age
ISA	Indeterminate Stone Age
KZNARI	KwaZulu-Natal Amafa & Research Institute
LIA	Late Iron Age
LSA	Late Stone Age
MSA	Middle Stone Age
PIA	Palaeontological Impact Assessment
SAHRA	South African Heritage Resources Agency

## **INTRODUCTION**

Mulilo Newcastle Wind Power (Pty) Ltd holds environmental authorisations for a wind energy facility near Newcastle in KwaZulu-Natal namely the:

- Mulilo Newcastle Wind Power WEF; and
- Mulilo Newcastle Wind Power 2 WEF.

Mulilo Newcastle Wind Power (Pty) Ltd proposes to develop, construct and operate the 200 MW Mulilo Newcastle Wind Power (MNWP) WEF as part of the Mulilo Newcastle Wind Energy Facility (WEF) Complex located near Newcastle in KwaZulu-Natal. The MNWP WEF will comprise up to 35 wind turbines and will have an anticipated lifespan of 20 – 25 years. The WEF will be located on six (6) land parcels with a total extent of 2,940 ha.

Mulilo Newcastle Wind Power 2 (Pty) Ltd proposes to develop, construct and operate the 160 MW Mulilo Newcastle Wind Power 2 (MNWP 2) WEF as part of the Mulilo Newcastle Wind Energy Facility (WEF) Complex located near Newcastle in KwaZulu-Natal. The MNWP 2 WEF will comprise up to 16 wind turbines and will have an anticipated lifespan of 20 – 25 years. The WEF will be located on eight (8) land parcels with a total extent of 1,626 ha.

### **PROJECT PROPOSAL**

Considering the above, Mulilo Newcastle Wind Power (Pty) Ltd (the Applicant) intends to apply for a mining permit (MP) and environmental authorisation (EA) from the Department of Mineral Resources and Energy (DMRE) for the development of a 5 ha quarry that will supply aggregate, gravel, and stone for the construction of the Mulilo Newcastle Wind Power WEF (MNWP WEF) projects.

During the design phase the Applicant identified five potential mining areas that all lay within the footprint of the six land parcels of the MNWP WEF authorisation. A preferred mining area of 5 ha will be chosen, from the five proposed sites, during the screening phase by the specialists and EAP who will then apply for the mining permit on the preferred site.

## **Mining Method**

The proposed mining footprint will entail the development of a greenfield site as no existing quarries/borrow pits exist on the earmarked farms that can be sourced/expanded. The proposed mining method will make use of blasting to loosen the hard rock; the material will then be loaded and hauled to the crushing plant where it will be screened to various sized stockpiles. When necessary, the material will be washed at an on-site washing plant prior to use. The material will be stockpiled until it is transported from the mining area to the relevant construction sites.

The proposed MP project will therefore entail the:

- site establishment and infrastructure development;
- stripping and stockpiling of topsoil from the proposed mining footprint area;
- blasting and excavation of the mining area;
- crushing and screening of the loosened material at the processing plant;
- washing of material (when needed), and
- stockpiling the product until used in the construction phase of the MNWP WEF projects.

Umlando was requested to undertake the desktop study for this proposed mining as the initial surveys had covered these areas. Figures 1 – 4 show the location of the development.

## **ASSUMPTIONS AND LIMITATIONS**

- The footprint of the proposed development will remain within the site boundary provided to Umlando by the client.
- The footprint was covered by the original Mulilo Windfarm heritage survey (Anderson 2022).

- The site falls in the general pattern of archaeological scatters noted from previous archaeological and heritage surveys.
- The survey cannot locate subsurface features that do not leave visible marks observable from aerial photographs.
- Subsurface features are unlikely in dolerite.

### **SCOPE OF WORK**

- Undertake a desktop study of the proposed development and decide whether further mitigation is required.
- Assess borrow pits for the best option that has the least impact on heritage sites.
- Assess heritage sites in terms of significance.
- Provide a management plan for each site.

FIG. 1 GENERAL LOCATION OF THE PROPOSED DEVELOPMENT

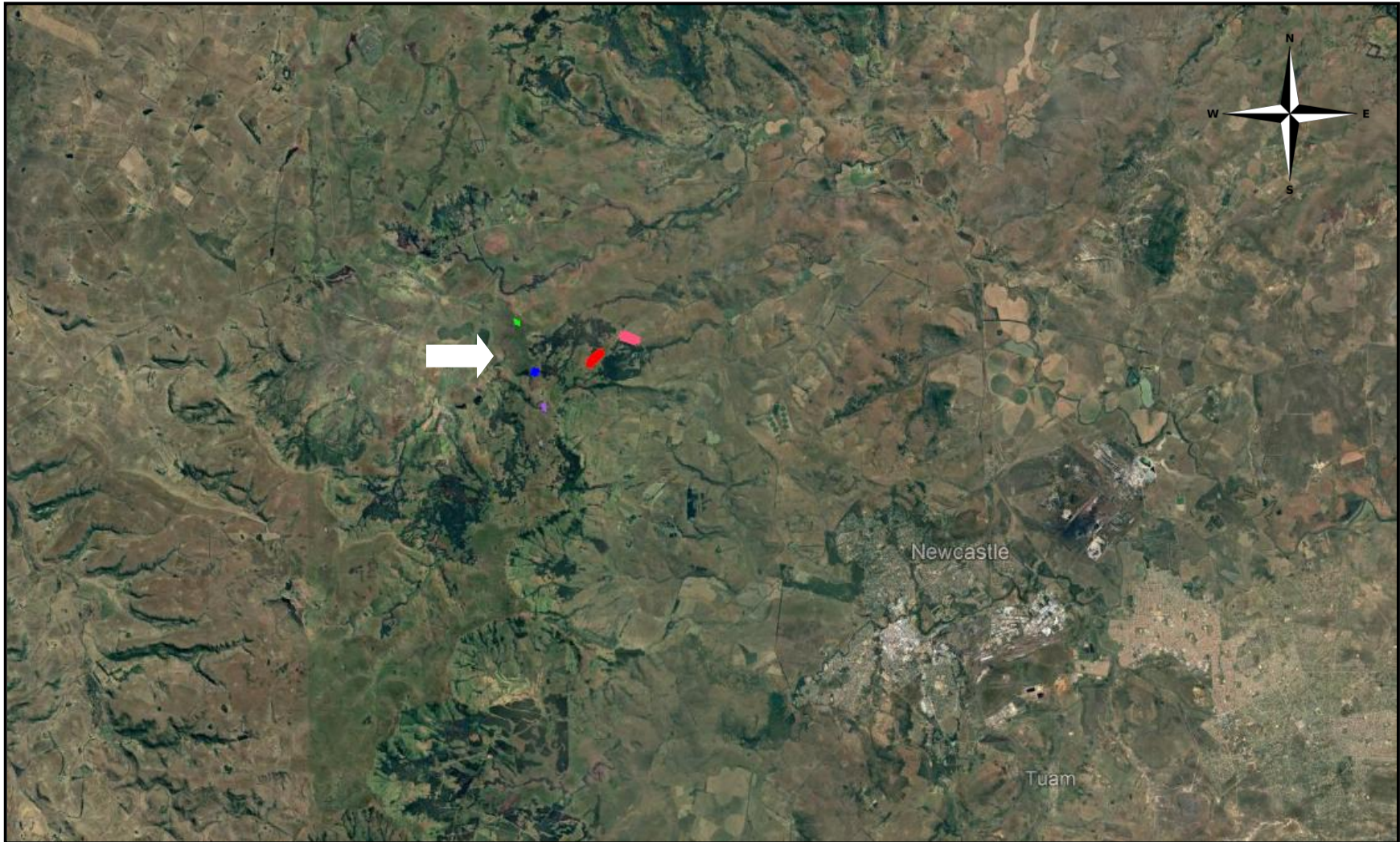
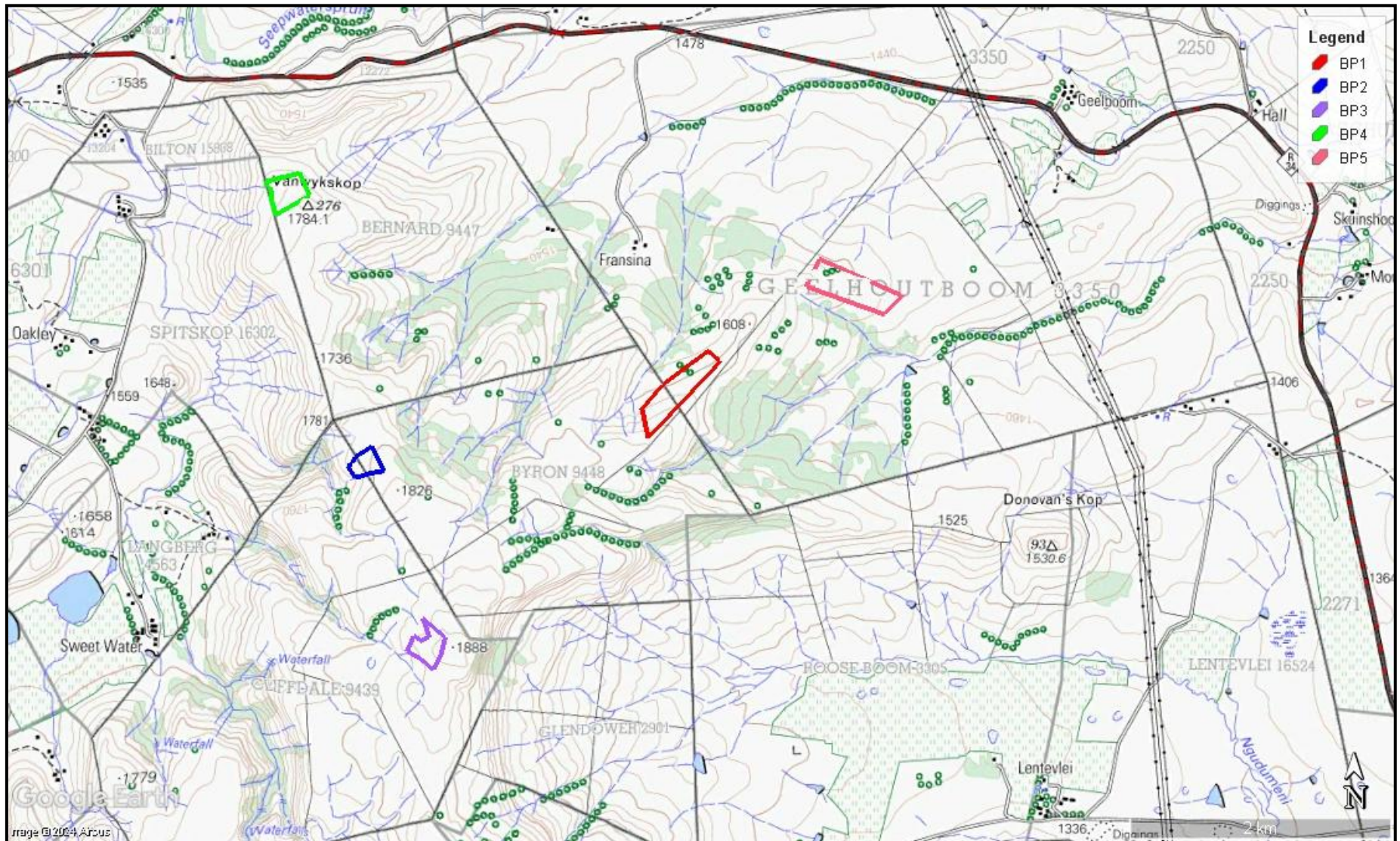




FIG. 2: AERIAL OVERVIEW OF THE DEVELOPMENT



FIG. 3 TOPOGRAPHICAL MAP OF THE PROPOSED DEVELOPMENT<sup>1</sup>



<sup>1</sup> 2729DB Ingogo 2003

**KWAZULU NATAL AMAFA AND RESEARCH INSTITUTE, ACT 05, 2018,**

The KwaZulu Natal Amafa And Research Institute, Act 05, 2018, Chapter 8 (pp 29 – 32) defines heritage resources.

**“General protection: Structures.**

37.(1)(a) No structure which is, or which may reasonably be expected to be older than 60 years, may be demolished, altered or added to without the prior written approval of the Institute having been obtained on written application to the Council.

(b) Where the Institute does not grant approval, the Institute must consider special protection in terms of sections 38, 39, 40, 41 and 43 of Chapter 9.

The Institute may, by notice in the *Gazette*, exempt—

- (a) A defined geographical area; or
- (b) defined categories of sites within a defined geographical area, from the provisions of subsection where the Institute is satisfied that heritage resources falling in the defined geographical area or category have been identified and are adequately protected in terms of sections 38, 39, 40, 41 and 43 of Chapter 9.

(3) A notice referred to in subsection (2) may, by notice in the *Gazette*, be amended or withdrawn by the Council.

**General protection: Graves of victims of conflict.**

38. No person may damage, alter, exhume, or remove from its original position

- (a) the grave of a victim of conflict;
- (b) a cemetery made up of such graves; or
- (c) any part of a cemetery containing such graves, without the prior written approval of the Institute having been obtained on written application to the Council.

**General protection: Informal and private burial grounds**

39.(1) or burial ground older than 60 years, or deemed to be of heritage significance by a heritage authority -

- (a) not otherwise protected by this Act; and
- (b) not located in a formal cemetery managed or administered by a local authority, may be damaged, altered, exhumed, removed from its original position, or otherwise disturbed without the prior written approval of the Institute having been obtained on written application to the Council.

The Institute may only issue written approval once the Institute is satisfied that—

- (a) the applicant has made a concerted effort to consult with communities and individuals who by tradition may have an interest in the grave; and
- (b) the applicant and the relevant communities or individuals have reached agreement regarding the grave.

**General protection: Battlefield sites, archaeological sites, rock art sites, palaeontological sites, historic fortifications, meteorite or meteorite impact sites.—**

40 (1) No person may destroy, damage, excavate, alter, write or draw upon, or otherwise disturb any battlefield site, archaeological site, rock art site, palaeontological site, historic fortification, meteorite or meteorite impact site without the prior written approval of the Institute having been obtained on written application to the Council.

(2) Upon discovery of archaeological or palaeontological material or a meteorite by any person, all activity or operations in the general vicinity of such material or meteorite must cease forthwith and a person who made the discovery must submit a written report to the Institute without delay.

(3) The Institute may, after consultation with an owner or controlling authority, by way of written notice served on the owner or controlling authority, prohibit any activity considered by the Institute to be inappropriate within 50 metres of a rock art site.

(4) No person may exhume, remove from its original position or otherwise disturb, damage, destroy, own or collect any object or material associated with any battlefield site, archaeological site, rock art site, palaeontological site, historic fortification, meteorite or meteorite impact site without the prior written approval of the Institute having been obtained on written application to the Council.

(5) No person may bring any equipment which assists in the detection of metals and archaeological and palaeontological objects and material, or excavation equipment onto any battlefield site, archaeological site, rock art site, palaeontological site, historic fortification, or meteorite impact site, or use similar detection or excavation equipment for the recovery of meteorites, without the prior written approval of the Institute having been obtained on written application to the Council.

(6)(a) The ownership of any object or material associated with any battlefield site, archaeological site, rock art site, palaeontological site, historic fortification, meteorite or meteorite impact site, on discovery, vests in the Provincial Government and the Institute is regarded as the custodian on behalf of the Provincial Government.

(b) The Institute may establish and maintain a provincial repository or repositories for the safekeeping or display of —

- (i) archaeological objects;
- (ii) palaeontological material;
- (iii) ecofacts;
- (iv) objects related to battlefield sites;
- (v) material cultural artefacts; or
- (vi) meteorites,

(7) The Institute may, subject to such conditions as the Institute may determine, loan any object or material referred to in subsection (6) to a national or provincial museum or institution.

(8) No person may, without the prior written approval of the Institute having been obtained on written application to the Institute, trade in, export or attempt to export from the Province ~

- (a) any category of archaeological object;
- (b) any palaeontological material;
- (c) any ecofact;
- (d) any object which may reasonably be regarded as having been recovered from a battlefield site;
- (e) any material cultural artefact; or
- (f) any meteorite.

(9){a} A person or institution in possession of an object or material, referred to in paragraphs (a) ~ (f) of subsection (8), must submit full particulars of such object or material, including such information as may be prescribed, to the Institute.

(b) An object or material referred to in paragraph (a) must, subject to paragraph (c) and the directives of the Institute, remain under the control of the person or institution submitting the particulars thereof.

(c) The ownership of any object or material referred to in paragraph (a) vests in the Provincial Government and the Institute is regarded as the custodian on behalf of the Provincial Government.”

## METHOD

The method for Heritage assessment consists of several steps.

The first step forms part of the desktop assessment. Here we would consult the database that has been collated by Umlando. This database contains archaeological site locations and basic information from several provinces (information from Umlando surveys and some colleagues), most of the national and provincial monuments and battlefields in Southern Africa and cemeteries in southern Africa (information supplied by the Genealogical Society of Southern Africa). We use 1<sup>st</sup> and 2<sup>nd</sup> edition 1:50 000 topographical and 1937 aerial

photographs where available, to assist in general location and dating of buildings and/or graves. The database is in Google Earth format and thus used as a quick reference when undertaking desktop studies. Where required we would consult with a local data recording centre, however these tend to be fragmented between different institutions and areas and thus difficult to access at times. We also consult with an historical architect, palaeontologist, and an historian where necessary.

The survey results will define the significance of each recorded site, as well as a management plan.

All sites are grouped according to low, medium, and high significance for the purpose of this report. Sites of low significance have no diagnostic artefacts or features. Sites of medium significance have diagnostic artefacts or features and these sites tend to be sampled. Sampling includes the collection of artefacts for future analysis. All diagnostic pottery, such as rims, lips, and decorated sherds are sampled, while bone, stone, and shell are mostly noted. Sampling usually occurs on most sites. Sites of high significance are excavated and/or extensively sampled. Those sites that are extensively sampled have high research potential, yet poor preservation of features.

### **Defining significance**

Heritage sites vary according to significance and several different criteria relate to each type of site. However, there are several criteria that allow for a general significance rating of archaeological sites. These criteria are:

#### **1. State of preservation of:**

- 1.1. Organic remains:
  - 1.1.1. Faunal
  - 1.1.2. Botanical
- 1.2. Rock art
- 1.3. Walling
- 1.4. Presence of a cultural deposit

1.5. Features:

1.5.1. Ash Features

1.5.2. Graves

1.5.3. Middens

1.5.4. Cattle byres

1.5.5. Bedding and ash complexes

**2. Spatial arrangements:**

2.1. Internal housing arrangements

2.2. Intra-site settlement patterns

2.3. Inter-site settlement patterns

**3. Features of the site:**

3.1. Are there any unusual, unique or rare artefacts or images at the site?

3.2. Is it a type site?

3.3. Does the site have a very good example of a specific time period, feature, or artefact?

**4. Research:**

4.1. Providing information on current research projects

4.2. Salvaging information for potential future research projects

**5. Inter- and intra-site variability**

5.1. Can this particular site yield information regarding intra-site variability, i.e. spatial relationships between various features and artefacts?

5.2. Can this particular site yield information about a community's social relationships within itself, or between other communities?

**6. Archaeological Experience:**

6.1. The personal experience and expertise of the CRM practitioner should not be ignored. Experience can indicate sites that have potentially significant aspects, but need to be tested prior to any conclusions.

**7. Educational:**

7.1. Does the site have the potential to be used as an educational instrument?

7.2. Does the site have the potential to become a tourist attraction?



7.3. The educational value of a site can only be fully determined after initial test-pit excavations and/or full excavations.

**8. Other Heritage Significance:**

- 8.1. Palaeontological sites
- 8.2. Historical buildings
- 8.3. Battlefields and general Anglo-Zulu and Anglo-Boer sites
- 8.4. Graves and/or community cemeteries
- 8.5. Living Heritage Sites
- 8.6. Cultural Landscapes, that includes old trees, hills, mountains, rivers, etc related to cultural or historical experiences.

The more a site can fulfill the above criteria, the more significant it becomes. Test-pit excavations are used to test the full potential of an archaeological deposit. This occurs in Phase 2. These test-pit excavations may require further excavations if the site is of significance (Phase 3). Sites may also be mapped and/or have artefacts sampled as a form of mitigation. Sampling normally occurs when the artefacts may be good examples of their type, but are not in a primary archaeological context. Mapping records the spatial relationship between features and artefacts. Table 1 lists the grading system.

**TABLE 1: SAHRA GRADINGS FOR HERITAGE SITES**

SITE SIGNIFICANCE	FIELD RATING	GRADE	RECOMMENDED MITIGATION
High Significance	National Significance	Grade 1	Site conservation / Site development
High Significance	Provincial Significance	Grade 2	Site conservation / Site development
High Significance	Local Significance	Grade 3A / 3B	
High / Medium Significance	Generally Protected A		Site conservation or mitigation prior to development / destruction
Medium Significance	Generally Protected B		Site conservation or mitigation / test excavation / systematic sampling / monitoring prior to or during development / destruction
Low Significance	Generally Protected C		On-site sampling monitoring or no archaeological mitigation required prior to or during development / destruction

## RESULTS

### DESKTOP STUDY

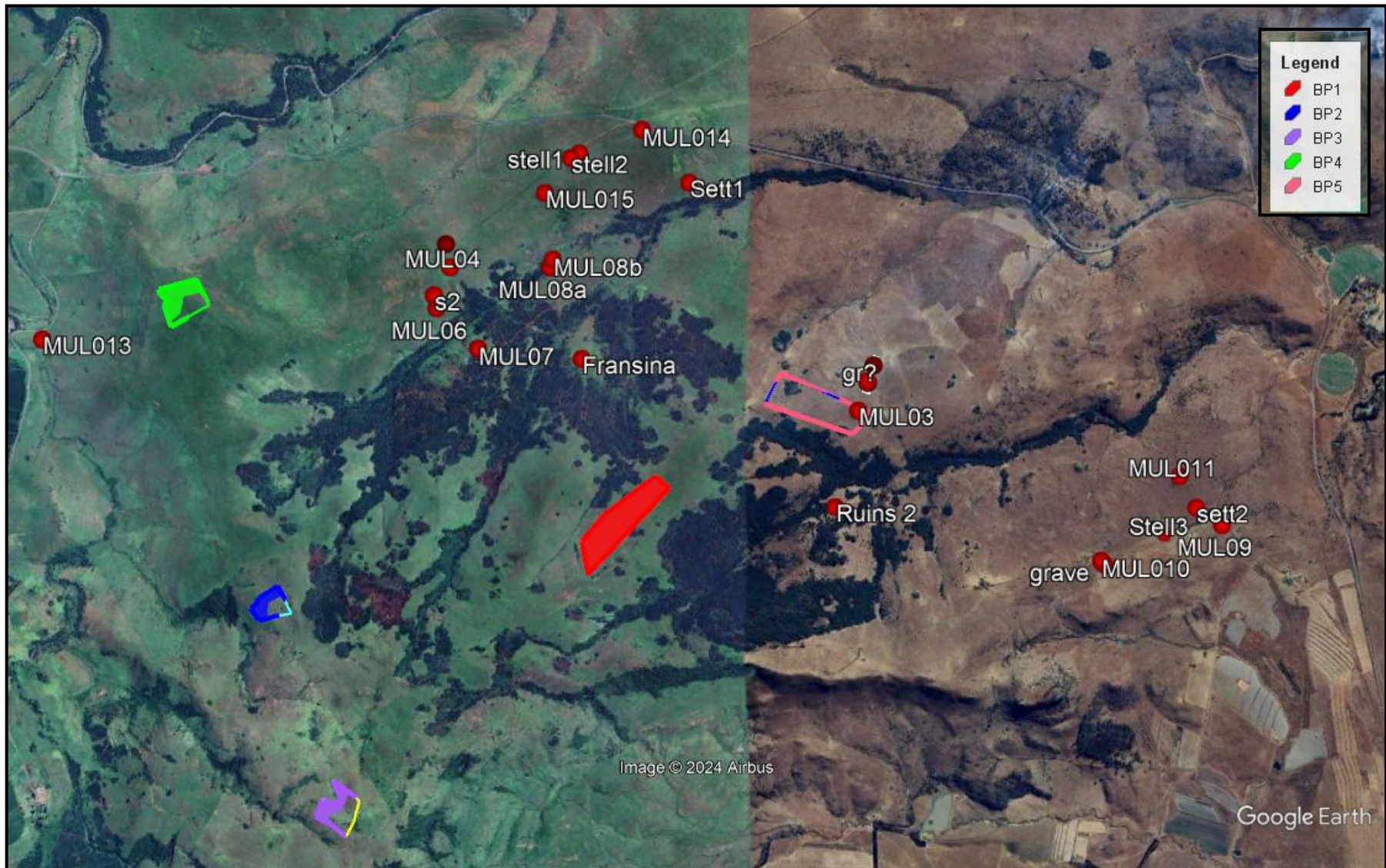
The original survey results (Anderson 2022) were compared to the location of the borrow pits (fig. 4). Only Borrow Pit 5 is located near heritage sites. These sites are MUL02 and MUL03. MUL02 is a two-roomed house, with a rectangular kraal and smaller rectangular foundations. There are probably graves associated with this settlement. This settlement will be of high significance if graves occurred. The vegetation was too dense during the survey to note graves.

MUL03 is an old dip of low significance.

Borrow Pits 1 – 4 are clear of heritage sites and either of these could be chosen. Borrow Pit 5 has more of a chance to affect heritage sites by means of an access road, and MUL02 will require a site revisit. Borrow Pit 5 will also require MUL02 to be demarcated.

The access roads to the five proposed borrow pits need to be assessed,.

FIG. 4: LOCATION OF KNOWN HERITAGE SITES FROM THE ORIGINAL SURVEY

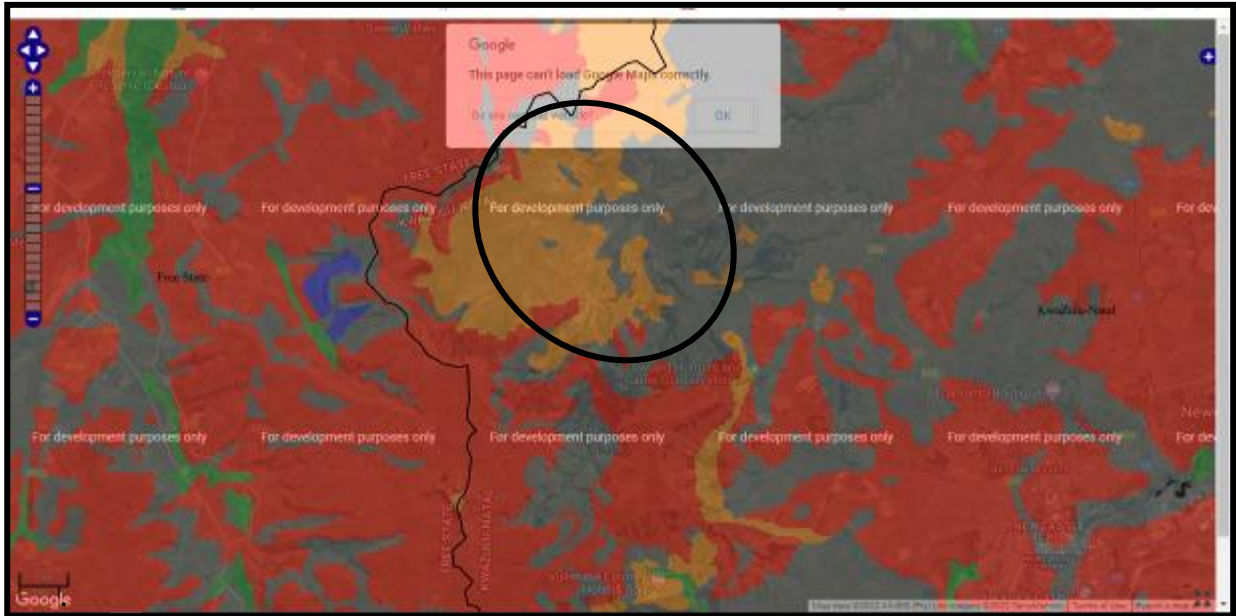


## PALAEONTOLOGICAL SENSITIVITY

Dr Alan Smith undertook the PIA desktop and fieldwork study for this project as some of the land was considered to be of high palaeontological significance (fig. 5). He states: "This site is dominated by Karoo Dolerite, which is an intrusive igneous rock and not fossiliferous. However the remaining lithologies may be fossiliferous. The areas underlain by significant fossiliferous lithologies are restricted to deep depressions and steep slopes, areas where turbine construction is very unlikely. These lithologies are adequately catered for by the "Chance find protocol" (see Appendix 2). The gridlines will cross Vryheid Formation. Although this is considered sensitive by the SAHRIS Palaeosensitivity Map, in practice no significant palaeontological material has been encountered. The gridlines follow existing industrial corridors (railway and Eskom powerline routes). For this reason it is the recommendation of this Field Report that no further palaeontological work needs to be undertaken, unless the "Chance Find Protocol" is triggered.

The type of material that will be mined will be dolerite. Dolerite is non fossiliferous material and no PIA mitigation will be required.

**FIG. 5: PALAEOANTHROLOGICAL SENSITIVITY MAP**



COLOUR	SENSITIVITY	REQUIRED ACTION
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

### CONCLUSION

The desktop study compared the proposed borrow pits in relation to recorded sites from the original survey. The survey covered all of the areas where the proposed borrow pits will be located. Only Borrow Pit 5 occurs near a heritage site with possible graves. Borrow Pit 5 is thus the least preferred option in terms of heritage.

The type of material that will be mined will be dolerite. Dolerite is non fossiliferous material and no PIA mitigation will be required.

The chances of heritage sites occurring within the study areas are very low. No further mitigation is required. However, a Chance Find Protocol will be initiated and needs to form part of the EMPr.

## REFERENCES

Anderson, G. 2022. Mulilo Wind Energy Farm Newcastle For Coastal Environmental Services

### **Maps:**

2729DB Ingogo 2003

### **Database**

KZN Museum

SAHRA

Umlando

### **EXPERIENCE OF THE HERITAGE CONSULTANT**

Gavin Anderson has a M. Phil (in archaeology and social psychology) degree from the University of Cape Town. Gavin has been working as a professional archaeologist and heritage impact assessor since 1995. He joined the South African Archaeology Association – CRM Section in 1998 that then became the Association of Southern African Professional Archaeologists. Gavin is rated as a Principle Investigator with expertise status in Rock Art, Stone Age and Iron Age studies. In addition to this, he was worked on both West and East Coast shell middens, Anglo-Boer War sites, and Historical Period sites.

### **DECLARATION OF INDEPENDENCE**

I, Gavin Anderson, declare that I am an independent specialist consultant and have no financial, personal or other interest in the proposed development, nor the developers or any of their subsidiaries, apart from fair remuneration for work performed in the delivery of heritage assessment services. There are no circumstances that compromise the objectivity of my performing such work.

A handwritten signature in black ink, appearing to read 'G. Anderson', with a horizontal line underneath.

Gavin Anderson  
Archaeologist/Heritage Impact Assessor

**APPENDIX A**  
**CHANCE FIND PROTOCOL**



## **CHANCE FIND PROTOCOL – HERITAGE RESOURCES**

### **PURPOSE**

Potential impacts on heritage resources can occur during construction as a result of unearthing during construction. This protocol outlines the procedures to be followed in the event that a heritage resource is uncovered.

### **Palaeontological finds**

Monitoring Programme for Palaeontology is to commence once the excavations for all structures and infrastructure begin. The following procedure is only required if fossils are seen on the surface and when excavations commence.

1. When excavations begin the rocks must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (silicified wood, plants, insects, bone, shells) should be put aside in a suitably protected place. This way the construction activities will not be interrupted.
2. Where possible, photographs of similar fossils must be provided to the contractor to assist in recognizing the fossil plants and bones that might be encountered on site. This information must be built into the EMP's training and awareness plan and procedures.
3. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
4. If there is any possible fossil material found by the Contractor/environmental officer then a qualified palaeontologist should visit the site to inspect the selected material and check the excavations where feasible.
5. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made

available for further study. Before the fossils are removed from the site, a South African Heritage Resources Agency (SAHRA) permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.

6. If no good fossil material is recovered, then any site inspections by the palaeontologist will not be necessary.

7. If no fossils are found and the excavations have finished, then no further monitoring is required.

### **Archaeological finds**

If you believe that you may have encountered any archaeological materials, stop work in the area and follow the procedure below:

1. The heritage resource must be avoided and all activities in the immediate vicinity temporarily ceased.
2. A suitably qualified specialist must be informed and commissioned to consider the heritage resource, either via communicating with the Environmental Officer via telephone or email, or based on a site visit.
3. Appropriate measures are to be provided by a qualified specialist towards immediate management of the heritage resource.

Should the specialist conclude that the find is a heritage resource protected in terms of the NRHA (1999) Sections 34, 36, 37 and NHRA (1999) Regulations (Regulation 38, 39, 40), the specialist must notify SAHRA on behalf of the Developer.

If required by SAHRA, the specialist must conduct a HIA in terms of NHRA Section 38 that must include rescue actions/excavations.

### **Graves**

Should any unmarked human burials/remains be found during the course of construction:

1. Work in the immediate vicinity should cease and the find must immediately be reported to the archaeologist, or the South African Heritage Resources Agency (SAHRA).
2. Where human remains are part of a burial they would need to be exhumed under a permit from SAHRA (for pre-colonial burials as well as burials later than about AD 1500).
3. For newer graves, should the specialist conclude that the find is a heritage resource protected in terms of the NHRA (1999) Section 35 and NHRA (1999) Regulations (Regulation 38, 39, 40) SAHRA may require that an identification of interested parties, consultation and /or grave relocation take place;
4. Consultation must take place in terms of NHRA (1999) Regulations 39, 40, 42;
5. Grave relocation must take place in terms of NHRA (1999) Regulations 34.
6. These measure should be undertaken by a qualified archaeologist, and in accordance with relevant legislation, permitting, statutory permissions and subject to any local and regional provisions, laws and by-laws pertaining to human remains.

If required by current, relevant legislation, a full social consultation process should occur in conjunction with the mitigation of cemeteries and burials.

Under no circumstances may burials be disturbed or removed until such time as necessary statutory procedures required for grave relocation have been met.