



**PGS**  
**HERITAGE**

**Archaeological Walkdown and Cultural Heritage Management Plan for  
the Tetra4 132kV and 33kV Powerlines Located in the Matjhabeng Local  
Municipality, Lejweleputswa District Municipality, Free State Province**

| Template Number   | Document Number | Revision | Date       |
|-------------------|-----------------|----------|------------|
| PGS PJ REP 007 07 | 1028HIA-Tetra4  | 1.1      | 01/07/2026 |

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## REVISION HISTORY

| Version | Issue Date | Description of Changes |
|---------|------------|------------------------|
| 1.0     | 29/06/2026 | First draft            |
| 1.1     | 01/07/2026 | First Amendment        |
|         |            |                        |

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**Specialist Declaration for assessments undertaken for application for authorisation in terms of the National Environmental Management Act (Act 107 of 1998) as amended and the Environmental Impact Assessment Regulations (Government Notice 982, Government Gazette 38282, 4 December 2014) as amended**

I, Duncan Mclean declare that –

- I act as the independent specialist in this application;
- I am aware of the procedures and requirements for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (Act 107 of 1998) as amended, when applying for environmental authorisation which were promulgated in Government Notice 320 (Government Gazette 43110, 20 March 2020) and in Government Notice 1150 (Government Gazette 43855, 30 October 2020).
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing –
  - any decision to be taken with respect to the application by the competent authority; and;
  - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of the Environmental Impact Assessment Regulations (Government Notice R982, Government Gazette 38282, 4 December 2014) as amended and is punishable in terms of section 24F of the National Environmental Management Act (Act 107 of 1998).
- I will take into account, to the extent possible, the matters listed in section 38 of the National Heritage Resources Act (Act 25 of 1999) when preparing the application and any report relating to the application.

**HERITAGE CONSULTANT:**

PGS Heritage (Pty) Ltd

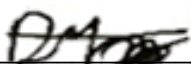
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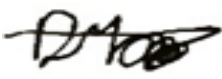
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### ACKNOWLEDGEMENT OF RECEIPT

|                     |                                                                                                                                                                                                             |                                                                                   |                                                                     |  |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|---------------------------------------------------------------------|--|
| <b>Report Title</b> | <b>Archaeological Walkdown and Heritage Management Plan for the Tetra4 132kV and 33kV Powerlines Located in the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province</b> |                                                                                   |                                                                     |  |
| <b>Control</b>      | <b>Name</b>                                                                                                                                                                                                 | <b>Signature</b>                                                                  | <b>Designation</b>                                                  |  |
| <b>Author</b>       | Duncan Mclean                                                                                                                                                                                               |  | PGS Heritage - Archaeologist                                        |  |
| <b>Reviewer</b>     | Alexander Andreou                                                                                                                                                                                           |                                                                                   | PGS Heritage - Senior Archaeologist/ Heritage Advisory Unit Manager |  |

**CLIENT:** Environmental Impact Management Services (Pty) Ltd

**CONTACT PERSON:** Qaphela Magaqa  
Email: qaphela@eims.co.za

**SIGNATURE:** \_\_\_\_\_

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## EXECUTIVE SUMMARY

PGS Heritage (Pty) Ltd was appointed by Environmental Impact Management Services (Pty) Ltd to conduct an Archaeological Walkdown and develop a Cultural Heritage Management Plan for the Tetra4 132kV and 33kV Powerlines near Virginia, in the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province

**During the study, no heritage resources were identified within the study area.**

By implementing the HMP and recommendations (

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Table 1) with regards to chance finds, the unidentified heritage resources can be managed responsibly and within the parameters for the construction of the Tetra4 132kV and 33kV Powerlines.

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*Table 1: Site-specific mitigation measures*

| Site                                 | Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b><u>Chance Finds Resources</u></b> | <p>Implement a chance to find procedure in cases where possible heritage finds are uncovered. This includes:</p> <ul style="list-style-type: none"> <li>- A heritage practitioner/archaeologist should be appointed to develop a heritage induction program and conduct training for the Environmental Control Officer (ECO) as well as team leaders in the identification of heritage resources and artefacts <b>during the implementation of the Environmental Management Program (EMPr)</b>.</li> <li>- An appropriately qualified heritage practitioner/archaeologist must be identified to be called upon in the event that any possible heritage resources or artefacts are identified.</li> <li>- Should an archaeological site or cultural material be discovered during construction (or operation), the area should be demarcated, and construction activities halted.</li> <li>- The qualified heritage practitioner/archaeologist will then need to come out to the site and evaluate the extent and importance of the heritage resources and make the necessary recommendations for mitigating the find and the impact on the heritage resource.</li> <li>- The contractor therefore should have a contingency plan so that operations could move elsewhere temporarily while the materials and data are recovered.</li> <li>- Construction can commence as soon as the site has been cleared and signed off by the heritage practitioner/archaeologist.</li> </ul> |

This HMP needs to be implemented with the onset of construction taking in to account the time frames for mitigation processes as indicated in **Table 2** to comply with the legislative requirements for the management of identified heritage resources and Plan formulation that will ensure their protection from threats.

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## TERMINOLOGY AND ABBREVIATIONS

### Archaeological resources

This includes:

- material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years including artefacts, human and hominid remains and artificial features and structures,
- rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency, and which is older than 100 years, including any area within 10 m of such representation,
- wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the republic as defined in the Maritimes Zones Act (Act 15 of 1994) and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which the South African Heritage Resources Agency (SAHRA) considers to be worthy of conservation,
- features, structures, and artefacts associated with military history which are older than 75 years and the site on which they are found.

### Archaeological Site

A cultural heritage site with physical remains or other evidence of past cultural activity, visible on the surface or present below ground, typically comprising artefacts, features, and anthropogenic deposits.

### Cultural Heritage

Cultural heritage refers to the tangible and intangible legacy of past and present communities that holds cultural, historical, scientific, aesthetic, or social significance. It encompasses practices, traditions, knowledge, places, structures, and objects that contribute to the identity and collective memory of a community or nation.

### Cultural Heritage Resources

Cultural heritage resources are those heritage resources that possess cultural significance, meaning they have aesthetic, historical, scientific, social, spiritual, linguistic, or technological value or importance. These resources reflect human interaction, history, and cultural identity. They may include archaeological sites, burial grounds, historical structures, cultural landscapes, sacred or traditional sites, and forms of living heritage such as oral traditions and rituals.

Examples include:

- historical settlements, sacred sites, and places of cultural practice,
- archaeological sites and artefacts,
- burial grounds and ancestral graves,
- oral traditions, rituals, and living heritage and

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- objects and structures associated with historical events or cultural identity.

### Cultural significance

This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic, or technological value or significance.

### Development

This means any physical intervention, excavation, or action, other than those caused by natural forces, which may in the opinion of the heritage authority in any way result in a change to the nature, appearance or physical nature of a place or influence its stability and future well-being, including:

- construction, alteration, demolition, removal or change in use of a place or a structure at a place,
- carrying out any works on or over or under a place,
- subdivision or consolidation of land comprising a place, including the structures or airspace of a place,
- constructing or putting up for display signs or boards,
- any change to the natural or existing condition or topography of land and
- any removal or destruction of trees, or removal of vegetation or topsoil.

### Early Stone Age

The archaeology of the Stone Age between 700 000 and 2 500 000 years ago.

### Fossil

Mineralised bones of animals, shellfish, plants, and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

### Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act (Act No. 25 of 1999) as amended.

### Heritage resources

As defined in the National Heritage Resources Act (Act No. 25 of 1999) as amended, *heritage resources* refer to any place or object of cultural significance and include all elements that form part of the National Estate. The term encompasses a wide range of tangible and intangible resources of cultural, historical, archaeological, palaeontological, architectural, scientific, or natural importance. This means any place or object of cultural significance and can include (but not limited to) as stated in section 3 of the National Heritage Resources Act (Act No. 25 of 1999) as amended;

- places, buildings, structures, and equipment of cultural significance,
- places to which oral traditions are attached, or which are associated with, living heritage,
- historical settlements and townscapes,
- landscapes and natural features of cultural significance,

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- geological sites of scientific or cultural importance,
- archaeological and palaeontological sites,
- graves and burial grounds and
- sites of significance relating to the history of slavery in South Africa.

### **Holocene**

The most recent geological time period which commenced 12 000 years ago (Refer: **Figure 1**).

### **Intangible Cultural Heritage**

Cultural knowledge and practices reflecting traditional ways of life (e.g. oral histories, songs, dances, and rituals).

### **Late Stone Age**

The archaeology of the last 30 000 years associated with fully modern people.

### **Early Farming Communities**

The archaeology of the last 1 800 years up to the 1800's, associated with iron-working and farming activities such as herding and agriculture associated with Bantu speaking peoples.

### **Middle Stone Age**

The archaeology of the Stone Age between 30 000 - 300 000 years ago, associated with early modern humans.

### **Palaeontology**

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 site which contains such fossilised remains or trace.

### **Tangible Cultural Heritage**

Movable or immovable sites, structures, or objects with archaeological, historical, cultural, artistic, or religious value, including natural features of cultural importance (e.g. sacred groves, trees, and rocks).

## **TERMINOLOGY AS PART OF THE PLAN**

**Client** –*Operational, Construction and Maintenance* - Project Company

**Archaeologist** – Professional Archaeologist accredited with the Association of Southern African Professional Archaeologists (ASAPA)

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**Archaeological Contractor** - Professional Archaeologist accredited with ASAPA, conducting rehabilitation or research on heritage sites in development.

**Contractor** – Any other person doing construction work on site including earthmoving, digging of holes and ditches.

**Site Manager** – Person appointed by the Client to manage the day-to-day activities of construction. Alternatively, a person directly responsible for maintenance activities on heritage site under the supervision of the Archaeologist.

**Environmental Control Officer (ECO)** - Person responsible for the monitoring of the environment during construction work.

**Primary or Direct Impacts** – Activities that might have a direct impact on heritage resources that will result in the destruction of such sites, during construction. These include earthmoving, the building of roads and other structures.

**Secondary Impacts** – Activities that may impact on a heritage resource after construction. These may include people walking through heritage resources and causing erosion of sites, damaging of stone walls by climbing over them, the collection of artefacts by people.

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**List of abbreviations used in this report.**

| Abbreviations | Description                                              |
|---------------|----------------------------------------------------------|
| AIA           | Archaeological Impact Assessment                         |
| ASAPA         | Association of South African Professional Archaeologists |
| AWD           | Archaeological Walk Down                                 |
| BGG           | Burial Grounds and Graves                                |
| CFP           | Chance Finds Procedure                                   |
| CRM           | Cultural Resource Management                             |
| EA            | Environmental Authorization                              |
| ECO           | Environmental Control Officer                            |
| EFC           | Early Farming Community                                  |
| EIMS          | Environmental Impact Management Services (Pty) Ltd       |
| EMPr          | Environmental Management program                         |
| GPS           | Global Positioning System                                |
| HIA           | Heritage Impact Assessment                               |
| HMP           | Heritage Management Plan                                 |
| IFC           | International Finance Corporation                        |
| NCW           | Not Conservation Worthy                                  |
| NHA           | National Health Act (Act 61 of 2003)                     |
| NHRA          | National Heritage Resources (Act 25 of 1999) as amended  |
| PGS           | PGS Heritage (Pty) Ltd                                   |
| PHRA          | Provincial Heritage Resources Authority                  |
| PIA           | Palaeontological Heritage Impact Assessments             |
| SAPS          | South African Police Services                            |
| SAHRA         | South African Heritage Resources Agency                  |

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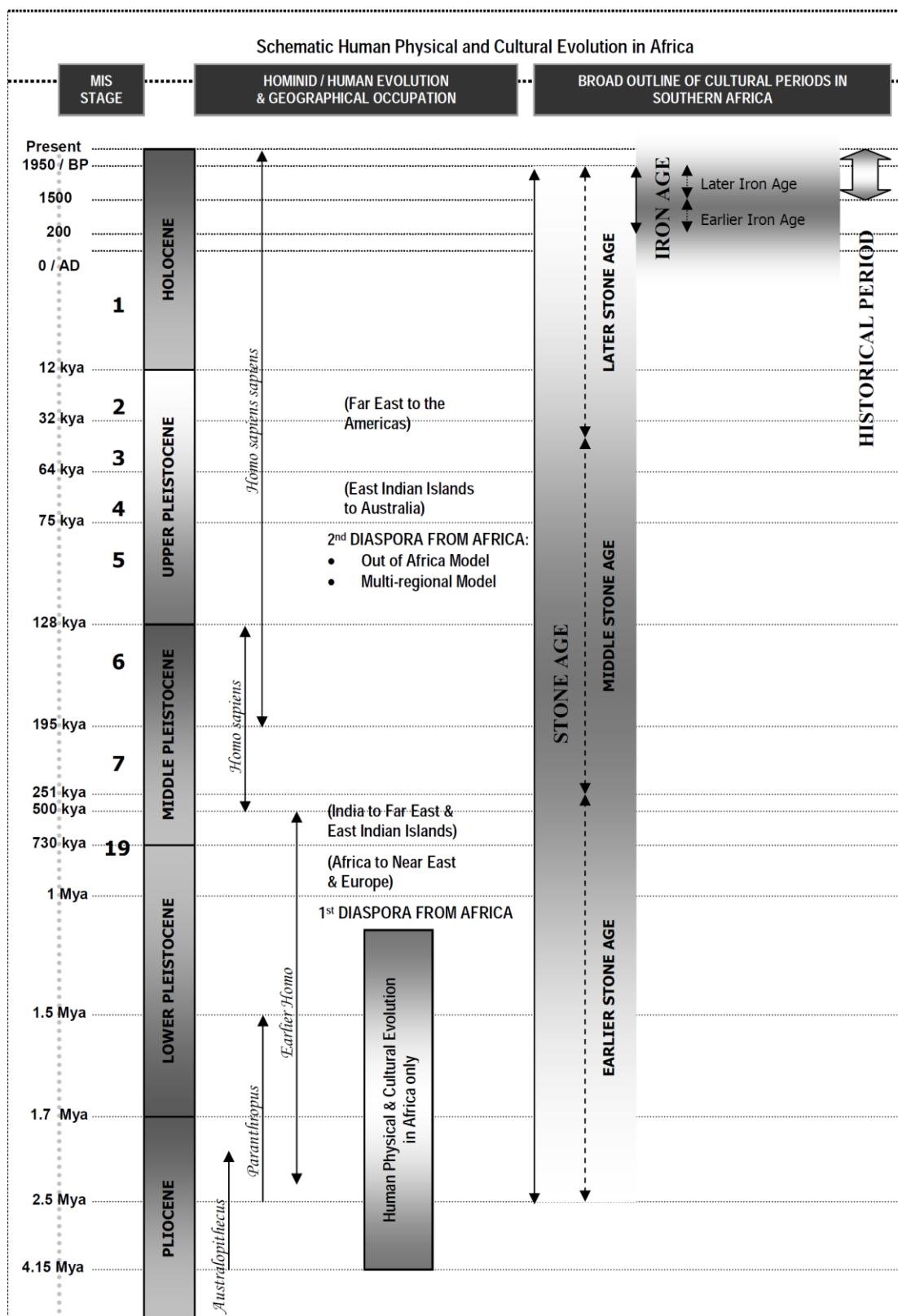


Figure 1 – Human and Cultural Timeline in Africa.

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## 1 INTRODUCTION

PGS Heritage (Pty) Ltd (PGS) was appointed by Environmental Impact Management Services (Pty) Ltd (EIMS) to conduct an Archaeological Walkdown (AWD) and develop a Cultural Heritage Management Plan (CHMP) for the Tetra4 132kV and 33kV Powerlines near Virginia, in the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province.

### 1.1 Scope of the Study

This document outlines the HMP for the identified cultural heritage resources. It provides guidance to the responsible person/organisation regarding possible conservation measures to manage sensitive cultural heritage resources identified during impact assessment studies and site surveys in compliance with applicable legislation, guidelines and best practice. The HMP includes a Chance Finds Procedure (CFP), which outlines the process to follow if any culturally significant heritage resources are found during construction or operation-related activities

### 1.2 Aims of the Heritage Management Plan

The primary aim of this HMP is to prevent and mitigate primary and secondary impacts on, and manage, identified cultural heritage resources before and after any construction. As such, the HMP provides the project developer(s) and other responsible entities/parties with guidance in terms of the type of development/construction activities that are allowed at locations at, or close to, identified cultural heritage resources and how to manage such activities.

The aims of an HMP include the following:

- direct what needs to be done, how the site<sup>1</sup> must be protected, who will be responsible, who will fund it and timelines for the completion of such actions,
- define the goals to be achieved and the type of activities/actions required,
- guide any future construction-related activities and management activities,
- determine the monitoring methodology,
- assist with stakeholder engagement and identification of interested parties,
- explain the permitting procedure,
- describe any professional requirements and clarify responsibilities,
- identify the site value and provide guiding principles for activities/actions on-site,
- minimise loss or avoid adverse impacts on cultural heritage resources,
- ensure that cultural heritage is incorporated in spatial planning and linked to social strategies,

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<sup>1</sup> Site in this context refers to a place where a heritage resource is located and not a proclaimed heritage site as contemplated under section 27 of the National Heritage Resources (Act 25 of 1999) (NHRA), as amended.

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- improve the understanding of cultural heritage and the contribution it makes to the broader management processes and
- ensure that proper investigation, recording, and stakeholder meetings take place.

### 1.3 Specialist Qualifications

This study was compiled by PGS appointed specialists and is detailed below:

The staff at PGS has a combined experience of over 100 years in the heritage consulting industry. PGS and its staff have extensive experience in managing the Heritage Impact Assessment (HIA) and HMP processes. PGS will only undertake heritage assessment work where they have the relevant expertise and experience to undertake that work competently.

Duncan Mclean has been involved in archaeological fieldwork and excavations for the last three years. He holds an Honours degree (BA Hons) in Archaeology from the University of Pretoria and is registered with the Association of Southern African Professional Archaeologists (ASAPA) as a Professional Archaeologist.

Alexander Andreou, Heritage Advisory Unit Manager, wields over a decade of transdisciplinary experience within the heritage resources management sector. He specialises in spatial biographies and urban archaeology. He holds an MPhil in Conservation of the Built Environment from the University of Cape Town, and a PhD in Development Studies, in the sub-field of Critical Architecture and Urbanism from the University of Pretoria. He is a registered member of the Association of Professional Heritage Practitioners (APHP), Association of Southern African Professional Archaeologists (APHP), The Historical Association of South Africa (HASA), and The International Association for Impact Assessment (IAIASa).

### 1.4 Assumptions and Limitations

Not detracting in any way from the comprehensiveness of the fieldwork undertaken, it is necessary to realise that the cultural heritage resources located during the study only represent some of the possible heritage resources present within the area. Various factors account for this, including the subterranean nature of some archaeological sites. As such, should any cultural heritage features and/or objects not included in the present inventory be located or observed, a heritage specialist/archaeologist must immediately be contacted (as per the CFP).

Such observed or located cultural heritage resources and/or objects may not be disturbed or removed in any way until such time that the heritage specialist/archaeologist has been able to assess the significance of the site (or material) in question. This also applies to graves and cemeteries. If any graves or burial places are located during the development, the procedures and requirements of graves and burials will apply as set out below.

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## 2 IDENTIFICATION OF POLICIES, LEGISLATION, STANDARDS & GUIDELINES

### 2.1 Statutory Framework: The National Heritage Resources (Act 25 of 1999), as amended

The NHRA has applicability, as the study forms part of an overall HIA in terms of the provisions of section 35, 36 and 38 of the NHRA and forms part of a heritage scoping study that serves to identify key heritage resources, informants, and issues relating to the palaeontological, archaeological, intangible and living heritage, built environment and cultural landscape, as well as the need to address such issues during the impact assessment and subsequent phases of the HIA process.

#### 2.1.1 *National Heritage Resources (Act 25 of 1999), as amended section 35 – Archaeology, Palaeontology and Meteorites*

According to section 35 (Archaeology, Palaeontology and Meteorites) and section 38 (Heritage Resources Management) of the NHRA, Palaeontological Impact Assessment (PIA) and Archaeological Impact Assessment (AIA) is required, by law, in the case of developments in areas underlain by potentially fossiliferous (fossil-bearing) rocks, especially where substantial bedrock excavations are envisaged, and where human settlement is known to have occurred during prehistory and the historic period.

#### 2.1.2 *National Heritage Resources (Act 25 of 1999), as amended section 36 – Burial Grounds and Graves*

The NHRA section protects Burial Grounds and Graves (BGG) that are older than 60 years and requires conservation and general care for BGG protected in terms of this section. The South African Heritage Resources Agency (SAHRA) may make such arrangements for the conservation of BGG as it sees fit. SAHRA must also identify and record the graves of victims of conflict and any other graves which it deems to be of cultural significance and may erect memorials associated with these graves and must maintain such memorials. A NHRA section 36 permit is required from SAHRA to undertake any of the following actions:

- destroy, damage, alter, exhume, or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves,
- destroy, damage, alter, exhume, remove from its original position, or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority, or
- bring onto or use at a burial ground or grave referred to above any excavation equipment, or any equipment which assists in the detection or recovery of metals.
- The relevant heritage resources authority may not issue a permit for the destruction or damage of any burial ground or grave referred to in subsection (3)(a) of the NHRA unless SAHRA is satisfied that the applicant for a permit has made satisfactory arrangements for the exhumation and re-interment of the contents of such graves, at the cost of the applicant.

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**2.1.3 National Heritage Resources (Act 25 of 1999), as amended section 38 Heritage Impact Assessment as a Specialist Study within the Environmental Impact Assessment in terms of section 38(8)**

A NHRA section 38 (HIA) application to SAHRA is required when the proposed development triggers one or more of the following activities:

- the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length,
- the construction of a bridge or similar structure exceeding 50 m in length,
- any development or other activity which will change the character of a site,
  - exceeding 5 000 m<sup>2</sup> in extent; or
  - involving three or more existing erven or subdivisions thereof; or
  - involving three or more erven or divisions thereof which have been consolidated within the past five years; or
  - the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority (PHRA),
- the re-zoning of a site exceeding 10 000 m<sup>2</sup> in extent, or
- any other category of development provided for in regulations by SAHRA or a PHRA.

This report complies with the requirements of section 38(3) of the NHRA in the,

- the identification and mapping of all heritage resources in the area affected,
- an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7 of the NHRA,
- plans for mitigation of any adverse effects during and after the completion of the proposed development.

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### 3 PROJECT LOCATION AND DESCRIPTION

Tetra4 holds a valid EA for the 33kV and 132kV Powerlines Project near Virginia, within the Matjhabeng Local Municipality, Free State Province issued in terms of the Environmental Impact Assessment Regulations, 2014 as amended by the Department of Forestry, Fisheries and the Environment in 2023 (Ref: 14/12/16/3/3/1/2754). The EA authorises the following activities:

- A new 132kV dual Loop-In-Loop-Out (LILO) powerline of approximately 5.5km in length connecting to the Eskom Theseus-Oryx 132kV Line. The proposed powerline will feed into a new 40 MVA substation at the Liquid Natural Gas (LNG)/Liquid Helium (LHe) plant to provide the plant with operational power requirements.
- A new 33kV powerline to connect a gas compressor station to the existing 33kV Beatrix powerline. The 33kV powerline will be approximately 1km in length.

The report highlights the following proposed amendments to the EA:

- Amendments to the approved powerline alignments (corridors) following the final design process and servitude agreements, resulting in deviations from the originally authorised corridors, including the inclusion of Portion 8 of Farm Alex Glen Ross No. 562 and the exclusion/avoidance of Portions 1 and 2 of the same farm;
- Amendments to the project layout and associated infrastructure positioning, informed by specialist walkdowns and micro-siting requirements in line with EA Condition 12;
- Amendments to the Generic Environmental Management Programme (EMPr) to incorporate site-specific mitigation measures identified during specialist walkdowns, as required by Conditions 13 to 17;
- Amendment to Condition 33 of the EA, to address the commencement requirement which currently links the powerline construction to the commencement of the Tetra4 Cluster 2 Gas Gathering and Production Project. The proposed amendment seeks to align the commencement provisions with the updated project implementation programme;
- Administrative amendment to update the details of the EA holder, in accordance with regulatory requirements; and
- Confirmation and integration of findings from the required pre-construction specialist walk-throughs, as stipulated in Condition 34, including identification of sensitive features and final micro-siting inputs.

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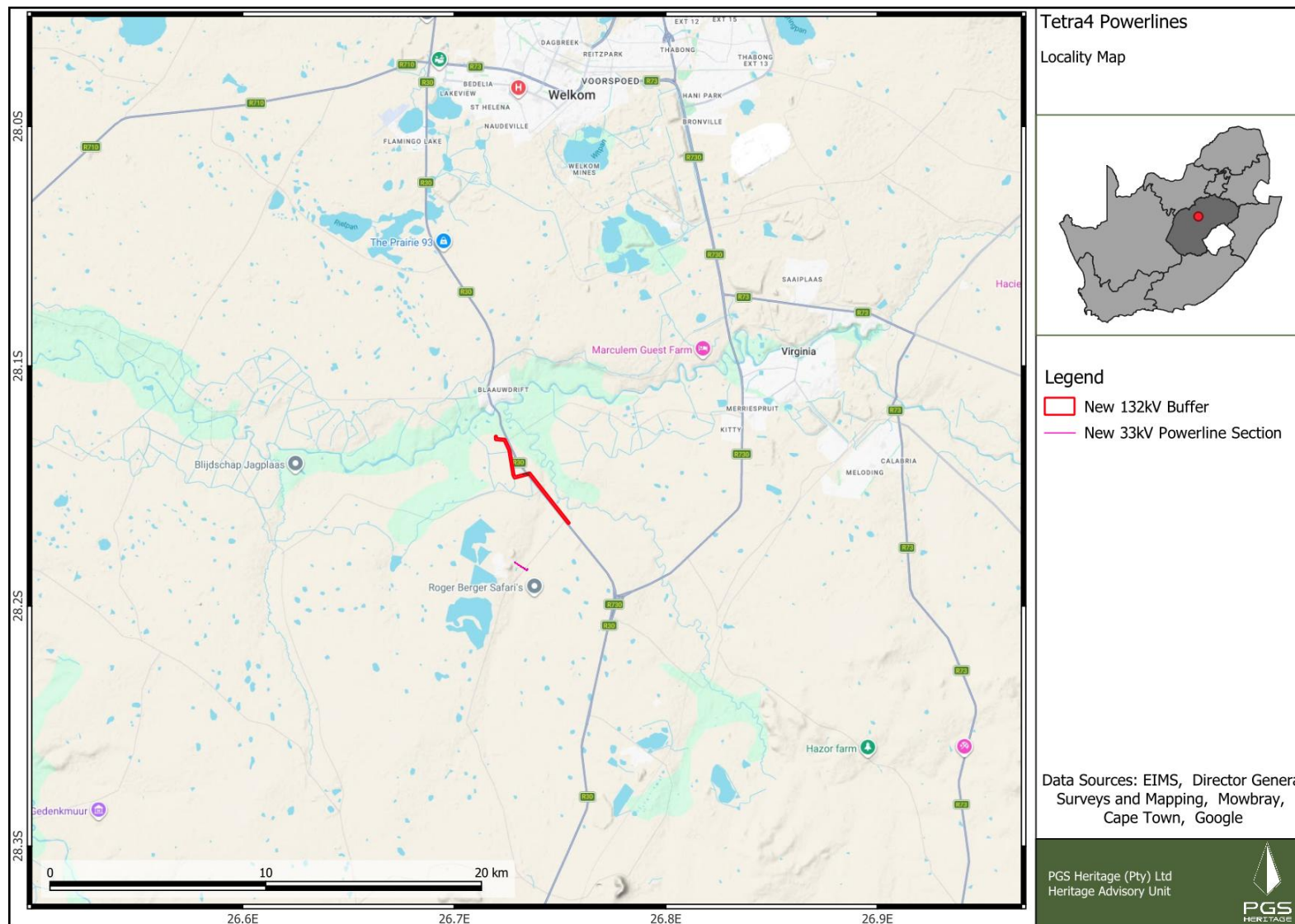


Figure 2 - Locality of the Tetra4 132kV and 33kV Powerlines.

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## 4 ASSESSMENT METHODOLOGY

This document was compiled by PGS, after the undertaking of an AWD for the Tetra4 132kV and 33kV Powerlines. The HMP process consisted of three steps:

Step I – Literature Review: Assess the recommendation contained in the completed HIAs and the EA working document.

Step II – Physical Survey: Conduct a walkdown of the alignment.

Step III – The final step involved the recording and documentation of any additional identified cultural heritage resources during the AWD report that has been compiled and includes the mapping of the cultural heritage resources identified and the relevant mitigation measures and management processes to be followed. The HMP includes recommendations on how cultural heritage resources will be assessed, documented, and managed, as well as identifying who the responsible person/organisation is for managing these resources during the different project phases.

## 5 ARCHAEOLOGICAL AND HISTORICAL RESOURCES IDENTIFIED<sup>2</sup>

The Archaeological Walkdown was undertaken by a qualified team of PGS Archaeologists on the 22<sup>nd</sup> June 2026. The tracklogs were recorded and are presented in **Figure 3**.

**During the study of the Tetra4 132kV and 33kV Powerlines, no heritage resources were identified within the study area.**

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<sup>2</sup> Site in this context refers to a place where a heritage resource is located and not a proclaimed heritage site as contemplated under section 27 of the NHRA.

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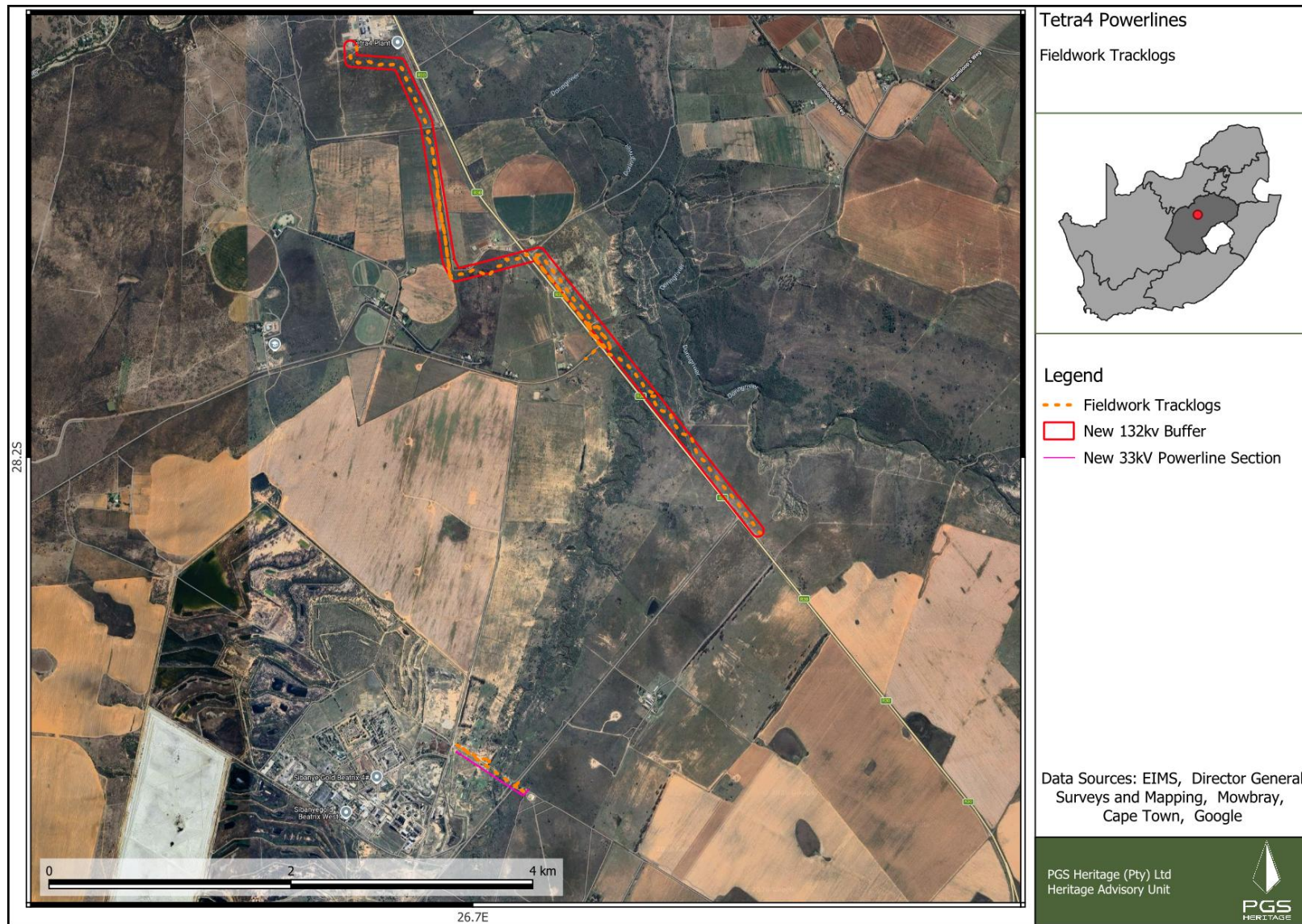


Figure 3 – Tetra4 132kV and 33kV Powerline with tracklogs of field surveys indicated.

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## 6 MANAGEMENT RECOMMENDATIONS AND GUIDELINES

### 6.1 Plan development

A Plan relating to the management and conservation of cultural heritage resources is developed in consultation with the client and all relevant role players. This Plan is based on the International Finance Corporation (IFC) Performance Standard<sup>3</sup> and includes:

The protection of irreplaceable cultural heritage and to guide clients on protecting cultural heritage during their business operations.

### 6.2 Objectives

- To protect cultural heritage resources from the adverse impacts of construction-related activities and support their preservation.
- To promote the equitable sharing of benefits from the use of cultural heritage in business activities.

This Plan covers all cultural heritage resources referring to tangible forms of cultural heritage, such as tangible property and sites having archaeological (prehistoric), palaeontological, historical, cultural, artistic, and religious values.

The Plan adheres to:

- Protection of cultural heritage in project design and execution.
- Internationally recognised practices.

In addition to complying with relevant legislation on the protection of cultural heritage, including national law (The World Heritage Convention Act, Act 49 of 1999) implementing South Africa's obligations under the UNESCO World Heritage Convention (1972) Convention Concerning the Protection of the World Cultural and Natural Heritage and other relevant international law, the client/ project developer(s) will protect and support cultural heritage resources by undertaking internationally recognized practices for the protection, field-based study, and documentation of cultural heritage.

### 6.3 General Management Guideline

1. The NHRA section 38 states that, any person who intends to undertake a development categorised as:
  - the construction of a road, wall, power line, pipeline, canal or other similar forms of linear development or barrier exceeding 300 m in length,

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<sup>3</sup> International Finance Corporation. 2012. Performance Standard 8. Cultural Heritage.

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- the construction of a bridge or similar structure exceeding 50 m in length,
  - any development or other activity which will change the character of a site -
    - exceeding 5 000 m<sup>2</sup> in extent, or
    - involving three or more existing erven or subdivisions thereof, or
    - involving three or more erven or divisions thereof which have been consolidated within the past five years, or
    - the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority,
  - the re-zoning of a site exceeding 10 000 m<sup>2</sup> in extent, or
  - any other category of development provided for in regulations by SAHRA or a PHRA,
- must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature, and extent of the development.

If an area previously not included in an archaeological or cultural resources survey is to be disturbed; SAHRA needs to be contacted. An enquiry into the necessity for an HIA must be lodged with SAHRA.

2. If a heritage assessment is required it is advisable to utilise a qualified heritage practitioner preferably registered with the Cultural Resources Management (CRM) Section of ASAPA.

This study (survey and evaluation) must include:

- the identification and mapping of all heritage resources in the area affected,
- an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6 (2) or prescribed under section 7 of the NHRA,
- an assessment of the impact of the development on such heritage resources,
- an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development,
- the results of consultation with communities affected by the development and other interested parties regarding the impact of the development on heritage resources,
- if heritage resources will be adversely affected by the development, the consideration of alternatives, and
- plans for mitigation of any adverse effects during and after the completion of the development.

3. If a possible find is discovered during construction, all activities must be halted in the discovery and a qualified heritage specialist/archaeologist contacted.
  - The heritage specialist/archaeologist needs to evaluate the finds on site and make recommendations towards possible mitigation measures.
  - If mitigation is necessary, an application for a rescue permit according to a work plan must be lodged with SAHRA.

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4. After mitigation, an application for a destruction permit must be lodged with SAHRA. This application must be supported by the mitigation report generated during the rescue excavation. Only after the permit is issued may such a site be destroyed.
5. If during the initial heritage survey sites of heritage significance are discovered, it will be necessary to develop a management plan for the preservation, documentation, or destruction of such sites. Such a program must include a watching brief, timeframe and agreed upon schedule of actions between the company and the heritage specialist/archaeologist.
6. If human remains are uncovered, or previously unknown graves are discovered a qualified heritage specialist/archaeologist needs to be contacted and an evaluation of the finds made.
  - If the remains are to be exhumed and relocated, the relocation procedures as accepted by SAHRA need to be followed. This includes an extensive social consultation process.

#### *6.3.1 General Operational activities - Pre-Construction or other related activity*

Based on the findings of the HIA and the AWD, all stakeholders and key personnel should undergo a heritage induction and cultural awareness course. Induction courses generally form part of the employees' overall training, and the heritage component can be integrated into these training sessions.

All key personnel should be made aware of the HMP and be required to familiarise themselves with the types of cultural heritage resources existing in their area of responsibility to incorporate the management of such resources into their operation's planning and activities. This should assist with preventing unnecessary delays or incidents resulting in damage to, or destruction of cultural heritage resources that are protected under the NHRA.

The heritage induction course should aim to:

- Provide information related to the relevant legislation for the protection of heritage sites (NHRA) and the penalties which may arise if sites/items are disturbed/destroyed.
- Raise awareness of the types and significance of the cultural heritage resources found within the development site.
- Provide an explanation of the process to follow when cultural heritage finds are identified, as per the CFP.

Evidence of training of all personnel should be submitted to SAHRA as part of the construction Progress Reports.

Furthermore, the Environmental Control Officer (ECO) should implement cultural awareness talks before the day-to-day construction activities start on-site to remind personnel of the No-Go-Zones and the process to follow during the discovery of chance finds.

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### 6.3.2 Construction Phase

Any planned activity could encompass a range of activities during the construction phase, including ground clearance, access road construction and excavations. It is possible that cultural heritage resources will be exposed during operations and feasibly may be recoverable, but this is the high-cost front of the operation, and thus any delays should be minimised.

- Development surrounding infrastructure and construction of facilities results in significant disturbance, but trenches and holes do offer a window into the past and it may be possible to rescue some of the heritage related data and materials.
- It is also possible that substantial alterations are implemented during this phase of the project, and these must be accommodated.
- Temporary roads and construction camps are often overlooked during the planning and implementation phases, with regards to AIA and HIA, causing some unmitigated environmental damage.
- Temporary infrastructure is often changed or added to the project; in general, these are low impact developments, being superficial; resulting in minimal alteration of the surface, but still, needs to be accounted for.
- Similarly, the construction of transmission lines are low impact developments in heritage terms, but excavation holes still may expose heritage resources.
- During any construction activities, it is important to recognise any material of heritage significance being unearthed and make the correct judgment on which actions should be taken.
- In addition, feedback reports can be submitted by the heritage specialist/archaeologist to the developer as the client and SAHRA to ensure effective monitoring.
- Should a heritage site or cultural heritage resources be discovered during construction (or operation), for example, burials, the project needs to be able to call on a qualified heritage specialist/archaeologist to make an expert decision on what is required and if necessary to carry out emergency recovery.
- SAHRA would need to be informed and may give advice on the procedure.
- The client should thus have contingency plans so that operations could move elsewhere temporarily while the material and data are recovered.
- The project, therefore, needs to have a heritage specialist/archaeologist available to do such work.

### 6.3.3 Possible finds during construction and operation

The study area occurs within a greater historical and archaeological landscape as identified during the impact assessment. Soil clearance for infrastructure, as well as the construction activities, could uncover the following:

- stone foundations,
- stone tools,

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- middens associated with historical and EFC structures that can contain bone, glass and/or ceramics, ash and metal objects, among others,
- unmarked graves.

In such cases a CFP should be implemented.

#### 6.4 Timeframes

It must be kept in mind that mitigation and monitoring of cultural heritage resources discovered during construction activity will require permitting for collection or excavation, and lead times must be worked into the construction time frames. **Table 2** provides guidelines for lead times related to permitting.

*Table 2: Lead times for permitting and mobilisation.*

| Action                                                                    | Responsibility                                                                               | Timeframe |
|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------|
| Preparation for field monitoring and finalisation of contracts            | The contractor and service provider                                                          | 1 month   |
| Application for permits to do necessary mitigation work                   | Service provider – Heritage specialist/archaeologist and SAHRA                               | 2 months  |
| Documentation, excavation, and archaeological report on the relevant site | Service provider – Heritage specialist/archaeologist                                         | 3 months  |
| Handling of chance finds – Graves/Human Remains                           | Service provider – Heritage specialist/archaeologist and SAHRA                               | 2 weeks   |
| Relocation of burial grounds or graves in the way of construction         | Service provider – Heritage specialist/archaeologist, SAHRA, Local and Provincial Government | 6 months  |

#### 6.5 Specific Management Guidelines

**Table 3** indicates specific management and mitigation guidelines according to the type of cultural heritage resource identified.

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## 6.6 Heritage Management Plan for Environmental Management Program implementation

*Table 3: Heritage Management Plan for Environmental Management*

| ISSUE                                                        | IMPACT                                                                                                                                                                                                                                                                                                                                                                             | STAGE OF PROJECT                           | TIMEFRAME                                   |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|---------------------------------------------|
|                                                              | <b>Potential Impact on Unidentified Archaeological Sites</b>                                                                                                                                                                                                                                                                                                                       | Construction, Operation                    | During, planning construction and operation |
| <b>DISCUSSION</b>                                            | As noted in <b>Section 5</b> , no archaeological resources were identified. However, due to the subterranean nature of archaeological resources, the following management and mitigation applies if any of these resources are uncovered during the construction-related activities.                                                                                               |                                            |                                             |
| <b>EXISTING IMPACT</b>                                       | No current existing impact.                                                                                                                                                                                                                                                                                                                                                        |                                            |                                             |
| <b>PREDICTED IMPACT</b>                                      | Potential destruction or damage of such resources requires a permit from the responsible heritage authority (NHRA, section 35)<br><br>The HIA and HMP documents provide a record of the location of such resources and enable the timeous management of such resources through various mitigation measures, including the adjustment of the construction activities, if necessary. | Destruction or damage during construction. |                                             |
| <b>WHEN IS MITIGATION REQUIRED</b>                           | During the design and before construction, no-go Areas must be demarcated.<br><br>Alternatively, mitigation measures such as the recording, collection and or/test excavation of sites must be planned and scheduled to fit within the timing of the activity phases.                                                                                                              |                                            |                                             |
| <b>RESPONSIBLE PARTY FOR IMPLEMENTATION</b>                  | Applicant, ECO<br>Heritage specialist/archaeologist                                                                                                                                                                                                                                                                                                                                |                                            |                                             |
| <b>MONITORING PARTY (FREQUENCY)</b>                          | ECO (Monthly reports/as or when required)                                                                                                                                                                                                                                                                                                                                          |                                            |                                             |
| <b>TARGET</b>                                                | Ensure compliance with relevant legislation and recommendations from SAHRA under sections 35, and 38 of NHRA.                                                                                                                                                                                                                                                                      |                                            |                                             |
| <b>PERFORMANCE INDICATORS (MONITORING TOOL AND OUTCOMES)</b> | ECO (Monthly reports during construction/as or when required)<br>Yearly Report to be submitted to SAHRA.                                                                                                                                                                                                                                                                           |                                            |                                             |

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| ISSUE                              | IMPACT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | STAGE OF PROJECT | TIMEFRAME |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------|
| <b>WHAT MITIGATION IS REQUIRED</b> | <p>General:</p> <ul style="list-style-type: none"> <li>When archaeological sites are accidentally discovered a CFP must be implemented that includes the process of work stoppage, site protection, evaluation and informing SAHRA of such finds and a final process of mitigation implementation.</li> <li>If development occurs within the vicinity of the identified archaeological resources, the construction team should be informed. The ECO should implement cultural awareness talks before construction activities commence to induct personnel in: <ul style="list-style-type: none"> <li>The types of cultural heritage sites that exist within the disturbance areas and that trigger the implementation of the CFP, which includes measures for dealing with archaeological and historical finds, palaeontological resources and BGG.</li> </ul> </li> </ul> <p>This HMP then needs to be implemented during construction and operations as part of the Environmental Management program (EMPr).</p> |                  |           |

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#### **6.7 General contact details to report all heritage related finds during construction.**

South African Heritage Resources Agency  
 Development Applications Unit  
 111 Harrington Street  
 Cape Town  
 8000  
 Tel +27 21 462 4502/8660  
 Email: [info@sahra.org.za](mailto:info@sahra.org.za)

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## 7 GUIDELINES FOR MITIGATION: CHANCE FINDS PROCEDURE AND ARCHAEOLOGICAL MITIGATION STRATEGY

The following section delineates the CFP and archaeological mitigation strategy that should be followed for accidentally discovered archaeological and cultural heritage resources during the construction activities and operation phase. Chance finds are defined as potential cultural heritage objects (archaeological and historical resources, palaeontology, and BGG) that are inadvertently unearthed. The CFP describes the process to be followed including work stoppage, site protection, evaluation and informing SAHRA of such finds and a final process of mitigation implementation.

### 7.1 Chance Finds of Archaeological and Historical Material

The following procedure is to be executed if archaeological or historical material is discovered:

- Should an archaeological/historical site or cultural material be discovered during construction (or operation); the area should be demarcated and construction activities halted in the demarcated area.
- Record the type of archaeological materials encountered, including their location in a report and take photos and Global Positioning System (GPS) coordinates of the find(s) *in situ*.
- Report the discovery of cultural heritage resources to the site supervisor as well as the project ECO.
- The ECO will then report the find to the Site Manager who will promptly notify the project heritage specialist/archaeologist and SAHRA.
- Delineate the discovered find/ feature/site and demarcate and institute a 30 m buffer zone.
- Secure the area to prevent any damage or loss of removable objects. The site should be treated as a No-Go-Zone until further notification.
- An appropriately qualified heritage specialist/archaeologist must be identified to be called upon if any possible heritage resources or artefacts are identified.
- The qualified heritage specialist/archaeologist will then need to come out to the site and evaluate the extent and importance of the heritage resources and make the necessary recommendations for mitigating the find and the impact on the heritage resource.
- In the case of further mitigation being required (as assessed by the heritage specialist/archaeologist) a work plan describing the methodology, aims and the heritage specialist/archaeologist that will be doing the work must be submitted to SAHRA for approval of the necessary mitigation.
- The developer should have a contingency plan so that operations could move elsewhere temporarily while the materials and data are recovered.
- If a destruction permit is required, construction can commence as soon as the site has been cleared and signed off by the heritage specialist/archaeologist and SAHRA.

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## 7.2 Chance Find Procedure for Burial Grounds and Graves

The following process should be implemented:

1. Discovery, Notify, Site protection and Identification.
2. Investigation and reporting.
3. Exhumation of graves and re-internment (in compliance with section 36 of the NHRA and applicable stipulations of the NHA).

### 7.2.1 Discover and Notify

In the event of an employee, consultant, contractor, or subcontractor discovering, exposing or unearthing human remains/graves/tombstones/traditional stone cairns whilst undertaking work on behalf of the project, the steps set out below must be followed immediately:

*Table 4: Critical steps when uncovering human remains.*

| Action                                                                                                                                                                                                | Responsible person                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <b>Step 1:</b> Immediately, upon the identification of the human remains or graves, all work at the relevant site must cease immediately to avoid desecration of the BGG or any other further damage. | Company employee, subsidiary, managed joint ventures, contractor, subcontractor, consultant exposing the remains or his/her supervisor. |
| <b>Step 2:</b> The discovery must be immediately reported to ECO.                                                                                                                                     | Company employee, subsidiary, managed joint ventures, contractor, subcontractor, consultant exposing the remains or his/her supervisor. |
| <b>Step 3:</b> ECO must immediately notify: the relevant site manager/supervisor and SAHRA.                                                                                                           | ECO                                                                                                                                     |

### 7.2.2 Site Protection and Identification

After the operations, where the BGG were accidentally disturbed or exposed, were ceased immediately, and the ECO were notified of the situation, the site needs to be protected from further damage and exposure, and the area should be identified by using the following steps:

*Table 5: Steps to ensure Protection and Identification*

| Action                                                                                                                                                                                                                                                                                                                                                                   | Responsible person |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| <b>Step 1:</b> The ECO and appointed persons to visit the site immediately to ensure that the area is clearly marked, cordoned off and secured to prevent unauthorised access and further potential damage.                                                                                                                                                              | ECO                |
| <b>Step 2:</b> ECO to appoint persons to watch over the BGG.                                                                                                                                                                                                                                                                                                             | ECO                |
| <b>Step 3:</b> ECO to notify: <ul style="list-style-type: none"> <li>• South African Police Service (SAPS) to ascertain whether a crime has been committed related to the human remains.</li> <li>• SAHRA to investigate the circumstance around the exposed remains.</li> <li>• The relevant Local Government authorities to ensure compliance with by-laws.</li> </ul> | ECO                |
| <b>Step 4:</b> ECO to set up a multidisciplinary team, usually comprising of: <ul style="list-style-type: none"> <li>○ Community Engagement and Stakeholder Relations Manager</li> <li>○ Safety Health and Environment,</li> <li>○ and any other relevant department.</li> </ul>                                                                                         | ECO                |

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| Action                                                                                                                                                                                                                                | Responsible person |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| <ul style="list-style-type: none"> <li>The Team will urgently appoint an experienced and qualified heritage specialist/archaeologist as required by SAHRA.</li> <li>Communicate the outcome of the investigation to SAHRA.</li> </ul> |                    |

### 7.2.3 Investigating and Reporting

The ECO and the heritage specialist/archaeologist will follow these two steps to ensure that the correct procedures are followed and that all the necessary information is available to continue with the exhumation and re-internment process:

*Table 6: Steps to ensure investigation and reporting.*

| Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Responsible person                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>Step 1:</b> The ECO along with the heritage specialist/archaeologist to visit the site to: <ul style="list-style-type: none"> <li>Take pictures of the gravesite and surrounding area</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | ECO and heritage specialist/archaeologist |
| <b>Step 2:</b> The heritage specialist/archaeologist will: <ul style="list-style-type: none"> <li>investigate the site and make a preliminary determination as to the nature and age of the remains (authentic BGG, informal BGG, older than 60 years/archaeological, older than 100 years),</li> <li>survey the affected area to establish GPS coordinates and to determine if there are any other graves or cultural heritage resources present,</li> <li>assist in the identification of the extent of the affected area and the demarcation thereof,</li> <li>Identify, count and number the graves/remains/heritage resources to create or add onto an existing grave register,</li> <li>start the grave exhumation and re-internment process.</li> </ul> | ECO and heritage specialist/archaeologist |

## 7.3 Archaeological Mitigation Strategy

If any cultural heritage or palaeontological resources are to be impacted on by construction-related activities, they will require mitigation measures as noted in **Section 6** above and in the CFP (**Section 7.1**). The following process will be required if any of the sites cannot be avoided through the recommended mitigation measures, and construction-related activities will have a direct impact on them as indicated in **Table 7**:

*Table 7: Process to be followed as part of the archaeological mitigation strategy*

| Action                                                      | Responsibility                                                 | Outcome                                                                                                     |
|-------------------------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Meeting on site to identify appropriate mitigation measures | Developer<br>ECO<br>Heritage specialist/archaeologist<br>SAHRA | Determine whether sites can be mitigated or if an archaeological mitigation strategy should be implemented. |
| Application for permit to conduct archaeological            | Heritage specialist/archaeologist<br>SAHRA                     | Application submission to SAHRA for review including:                                                       |

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| Action                                                 | Responsibility                                                              | Outcome                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| mitigation through a Work Plan submission to SAHRA     | Developer                                                                   | Heritage specialist/archaeologist Work Plan and documentation of site as well as a Letter of Agreement from the Developer on work to be done and appointment of Heritage specialist/archaeologist.                                                                                                                                                                   |
| Physical survey of site layout in the development area | Heritage specialist/archaeologist                                           | The project Heritage specialist/archaeologist will complete a report on the findings as part of the permit application process.                                                                                                                                                                                                                                      |
| Obtaining of mitigation permit from SAHRA              | Heritage specialist/archaeologist<br>Client                                 | Mitigation work plan approval from SAHRA.                                                                                                                                                                                                                                                                                                                            |
| Physical archaeological mitigation involve:            | Heritage specialist/archaeologist with a team of field assistants           | Conduct archaeological investigation/excavations/recording of the site (recording of all archaeological and heritage finds).                                                                                                                                                                                                                                         |
| Lab Analysis and Documentation completion – Reporting  | Heritage specialist/archaeologist, with a team of field assistants          | Investigation of archaeological deposits will be undertaken by hand, all finds, materials and samples will be collected and documented and submitted to a Museum/Repository for curation in compliance with the NHRA and SAHRA requirements according to archaeological best practice.                                                                               |
| Application for destruction Permit                     | Heritage specialist/archaeologist<br>SAHRA – Review and final authorisation | <ul style="list-style-type: none"> <li>The project Heritage specialist/archaeologist will complete a final site report on the findings and submit to SAHRA for review and apply for a destruction Permit.</li> <li>Once authorisation has been given by SAHRA, the Applicant (Client/Developer) will be informed when construction activities can resume.</li> </ul> |
| Commencement of construction                           | Client<br>SAHRA<br>Heritage specialist/archaeologist                        | Destruction permit received.<br>Heritage specialist/archaeologist to monitor site.                                                                                                                                                                                                                                                                                   |

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## 8 CONCLUSIONS AND RECOMMENDATIONS

PGS was appointed by EIMS to conduct an AWD and develop a CHMP for the Tetra4 132kV and 33kV Powerlines near Virginia, in the Matjhabeng Local Municipality, Lejweleputswa District Municipality, Free State Province

**During the study, no heritage resources were identified within the study area.**

By implementing the HMP and recommendations (**Table 8**), the unidentified cultural heritage resources can be managed responsibly and within the parameters for the construction of the Tetra4 132kV and 33kV Powerlines.

### 8.1 Specific management guidelines

*Table 8: Site-specific mitigation measures*

| Site                                 | Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b><u>Chance Finds Resources</u></b> | <p>Implement a chance to find procedure in cases where possible heritage finds are uncovered. This includes:</p> <ul style="list-style-type: none"> <li>- A heritage practitioner/archaeologist should be appointed to develop a heritage induction program and conduct training for the Environmental Control Officer (ECO) as well as team leaders in the identification of heritage resources and artefacts <b>during the implementation of the Environmental Management Program (EMPr)</b>.</li> <li>- An appropriately qualified heritage practitioner/archaeologist must be identified to be called upon in the event that any possible heritage resources or artefacts are identified.</li> <li>- Should an archaeological site or cultural material be discovered during construction (or operation), the area should be demarcated, and construction activities halted.</li> <li>- The qualified heritage practitioner/archaeologist will then need to come out to the site and evaluate the extent and importance of the heritage resources and make the necessary recommendations for mitigating the find and the impact on the heritage resource.</li> <li>- The contractor therefore should have a contingency plan so that operations could move elsewhere temporarily while the materials and data are recovered.</li> <li>- Construction can commence as soon as the site has been cleared and signed off by the heritage practitioner/archaeologist.</li> </ul> |

This HMP needs to be implemented with the onset of construction taking into account the time frames for mitigation processes as indicated in **Table 2** to comply with the legislative requirements for the management of identified heritage resources and plan formulation that will ensure their protection from threats.

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**ANNEXURE A**  
**PGS TEAM CVS**

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## DUNCAN MCLEAN

Professional Heritage Practitioner

### PROFILE

I hold an advanced degree in Archaeology from the University of Pretoria, with a specialisation in Iron Age studies of Southern Africa and a focus on faunal analysis. My academic background is complemented by practical experience in museum archaeology and heritage management.

Through my studies and laboratory work, I have developed expertise in historical artefact identification and research. My professional experience with PGS Heritage has further honed my skills in archaeological mitigations, site monitoring, and surveys across various scales.

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## EDUCATION

**University of Pretoria**  
2020-2022  
BA Degree - Majors in Archaeology and Ancient Cultures

**University of Pretoria**  
2023  
BA Hons - Archaeology

## WORK EXPERIENCE

**PGS Heritage – Archaeologist**  
2025 - present

As a member of the Heritage Advisory Unit for PGS Heritage, I am currently a CRM practitioner focusing on conducting Heritage Impact Assessments, Heritage Management Plans, and Site Sensitivity Verification Reports across the country.

**PGS Heritage – Junior Archaeologist**  
2024- 2025

My experience encompasses leading small teams in various mitigation projects, ranging from small to large-scale, primarily in the Komatipoort region and near Brits. My responsibilities included utilising GPS systems, conducting site and artefact photography, and performing site monitoring. I have conducted archaeological monitoring near Steelpoort and Komatipoort, as well as HIAs, HMPs, and SSVRs.

**Internship at PGS Heritage**  
2023

Assisted with surveys and the processes behind surveying, as well as gained insight into a large-scale mitigation project in the Komatipoort region.

**Tutoring**  
2022

Tutored primarily History at a high school level as opportunities arose.

## PROFESSIONAL AFFILIATION

**ASAPA Accredited Professional Archaeologist** – Association of Southern African Professional Archaeologists

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## ALEXANDER ANDREOU

Heritage Practitioner &  
Built Environment  
Specialist

### PROFILE

My professional career includes research, curation, conservation, risk mitigation, critical urbanism, and legislative compliance. I hold two advanced postgraduate degrees; with my MPhil research focusing on (re)interpretation in the archaeological praxis, and my PhD research on the role of heritage built environment and what I coined as 'archived buildings' in the creation and recording of public and social histories.

My work at PGS Heritage is centered on leading the Built Environment Unit, which focuses on the safeguarding and activation of South Africa's historic fabric.

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## EDUCATION

**University of Pretoria**  
2011 - 2013  
BA Archaeology & Ancient Cultures

**University of Pretoria**  
2015  
Post-Graduate Diploma Museum and Heritage Studies

**University of Cape Town**  
2019 - 2021  
MPhil Conservation of the Built Environment

**University of Pretoria**  
2023 - 2025  
PhD Development Studies (Research Chair for Critical Architecture and Urbanism)

## WORK EXPERIENCE

**PGS Heritage Group of Companies**  
(South Africa, Lesotho, Mozambique, and Portugal)  
**Senior Heritage Specialist**  
2025 - present

I support the advancement of PGS Heritage's presence within the built heritage sector, providing specialist input on conservation management strategies, interpretive frameworks, and practical application of national heritage legislation within development and planning contexts. My role includes authorship, editorial, and technical review support for HIAs and related reports, as well as archival and historical research.

**Nedbank Group Ltd**  
**Heritage & Arts Manager (i.a.)**  
2016 - 2025

Led a series of dynamic and multidisciplinary roles that blended cultural stewardship with practical management. It ensured that Nedbank's heritage and art assets were safe guarded in alignment with best practice and national legislation. The role wove together archival expertise with strategic initiatives, ensuring the preservation, accessibility, and visibility of the institution's historical legacy.

**University of Pretoria Museums**  
**Cultural Officer (i.a.)**  
2014 - 2016

Championed public engagement, documentation, and preservation across UP's museological collections, specifically the Mapungubwe gold, bone, ivory, and ceramics. I contributed to key research, access, and conservation initiatives through collaborative, community-focused projects and international partnerships.

## PROFESSIONAL AFFILIATION

**Accredited Heritage Practitioner**  
Association of Professional Heritage Practitioners

**Accredited Archaeologist**  
Association of Southern African Professional Archaeologists