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# MINIMUM STANDARDS: ARCHAEOLOGICAL AND PALAEOLOGICAL COMPONENTS OF IMPACT ASSESSMENT REPORTS

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## I. GENERAL INFORMATION

### 1. WHAT ARE ARCHAEOLOGICAL AND PALAEOLOGICAL IMPACT ASSESSMENTS?

South Africa's unique and non-renewable archaeological and palaeontological heritage sites are 'Generally' protected in terms of the National Heritage Resources Act (Act No 25 of 1999, section 35) and may not be disturbed at all without a permit from the relevant heritage resources authority.

As many heritage sites are threatened daily by development, both the environmental and heritage legislation require impact assessment (IA) reports by qualified professionals that identify all heritage resources including archaeological and palaeontological sites in the area to be developed, and that make recommendations for protection or mitigation of the impact of the sites.

Where possible archaeological and palaeontological sites should be saved, but where this is not possible, the loss of information about our heritage resources can be mitigated against or minimised through a process of excavation (or sampling) and dating of a representative sample of the evidence from the site. This allows us to record at least part of the history of the place. Experience has shown that early assessment and mitigation minimises the negative effects of development and often saves the developer considerable delays and related costs.

## 2. HOW DO IMPACT ASSESSMENTS FIT INTO PLANNING?

Archaeological Impact Assessments (AIAs) and Palaeontological Impact Assessments (PIAs) are most often specialist reports that form part of the wider heritage component of:

- Environmental Impact Assessments (EIAs) required in terms of the National Environmental Management Act, Act 107 of 1998, or of the Environment Conservation Act, Act 73 of 1989) by the provincial Department of Environmental Affairs; or
- Environmental Management Plans (EMPs) required by the Department of Minerals and Energy.

These specialist reports may also form part of:

- Heritage Impact Assessments (HIAs) called for in terms of Section 38 of the National Heritage Resources Act, Act No. 25, 1999 by a heritage resources authority.

The legislation<sup>1</sup> requires that all heritage resources, that is, all places or objects of aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance are protected. Thus any assessment should make provision for the protection of ALL these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures over 60 years, living heritage and the collection of oral histories, historical settlements, landscapes, geological sites, palaeontological sites and objects.

The archaeological and palaeontological components discussed here therefore form only part of the heritage resources that the law requires heritage authorities to assess. Specialists must acknowledge this and ensure that if they do not have the capacity to assess other heritage components they team up with heritage practitioners who do, or, at least, refer heritage components for which they do not have expertise to appropriate specialists or draw the attention of consultants and developers to the need for assessment of other heritage components.

In this sense, Archaeological (or Palaeontological) Impact Assessments that are part of Heritage Impact Assessments are similar to specialist reports that form part of the EIA process.

The minimum standards discussed below for archaeological and, where applicable, for palaeontological specialist assessments should be adhered to during the compilation of any Heritage Resources Impact Assessment Report.

The process of assessment, for the archaeological (AIA) or palaeontological (PIA) specialist components of heritage impact assessments, usually involves:

1. An initial pre-assessment (scoping) phase, where the specialist establishes the scope of the project and terms of reference for the developer. This is not discussed further here.
2. A **Phase 1 Impact Assessment/ Specialist Report**, which identifies
  - a. Identifies the sites;
  - b. Assesses their significance;
  - c. Comments on the impact of the development;
  - d. Makes recommendations for their mitigation or conservation,
3. OR: A **Letter of Recommendation for Exemption** (if there is no likelihood that any sites will be impacted).
4. **Phase 2 Mitigation/ Rescue**, which involves planning the protection of significant sites or sampling through excavation or collection (in terms of a permit) at sites that may be lost.

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<sup>1</sup> National Heritage Resources Act (Act No. 25 of 1999, section 35) and KwaZulu-Natal Heritage Act (No. 10 of 1997, section 27)

5. A **'Phase 3' Heritage Site Management Plan** (for heritage conservation), may be required in rare cases where the site is so important that development will not be allowed. Developers may also choose to, or be encouraged to, enhance the value of the sites retained on their properties with appropriate interpretive material or displays.

### 3. STAGES OF ASSESSMENT

#### 3.1. Phase 1 Impact Assessments

Phase 1 Archaeological Assessments generally involve a field survey of the proposed development and will include:

- e. Details of the property to be developed and the type of assessment (s.38 (1 or 8));
- f. Location of the sites that are found;
- g. Short description of the characteristics of each site;
- h. Short assessment of the importance of each site, indicating which should be conserved and which mitigated;
- i. Assessment of the potential impact of the development on the site/s;
- j. In some cases, a shovel test, to establish the extent of a site, or collection of material might be required to identify the associations of the site. (A pre-arranged permit is required); and
- k. Recommendations for conservation or mitigation.

The report is intended to inform the client about the legislative protection of heritage resources and their significance and make appropriate recommendations. It is essential that it also provides the heritage authority with sufficient information about the sites to enable it to assess with confidence:

- a. Whether or not it has objections to a development;
- b. What the conditions are upon which such development might proceed;
- c. Which sites require permits for destruction;
- d. Which sites require permits for mitigation and what this should comprise;
- e. Whether sites must be conserved and what alternatives can be proposed that may re-locate the development in such a way as to conserve other sites, for example, by incorporating them in a wilderness area, or under a parking space; and what measures should/can be put in place to protect the sites that should be conserved.

Phase 1 Palaeontological Assessments should follow a similar process in order to characterise, date and record the fossil record in the area. However Palaeontological Phase 1 assessments may also involve collecting of material in this initial phase and the heritage resources authority will require that the practitioner hold a valid permit for this.

When a Phase 1 is part of an EIA, wider issues such as public consultation and assessment of the spatial and visual impacts of the development may be undertaken as part of the general study and may not be required from the archaeologist. If however the Phase 1 forms a major component of an HIA it will be necessary to ensure that the study addresses such issues and complies with section 38 of the National Heritage Resources Act.

Phase 1 Specialist Reports (AIAs) will be assessed by the relevant heritage resources authority. If the decision is that sites are of low significance, they may, after recording, be destroyed to make way for development. The final decision about this should be taken by the heritage resources authority, which should give formal permission for the destruction.

In the case of AIAs that are part of EIAs or EMPs, the heritage resources authority will issue comment or a record of decision (ROD) that may be forwarded to the consultant or developer, relevant government department or heritage practitioner and where feasible to all three.

When a property is either very disturbed (e.g. has been quarried or mined) or is very small and the archaeologist can see that it is highly unlikely that any archaeological remains will be found, a **'Letter of Recommendation for Exemption'** from a full Phase 1 report may be supplied. This must be accompanied by a map and photograph indicating landscape features. (Remember: *Absence of evidence is not necessarily evidence of absence* and **use this option with caution**).

### 3.2. Phase 2 Archaeological Mitigation

If sites that cannot or need not be saved from development carry information of significance about the past, the archaeologist will recommend a Phase 2 Archaeological Mitigation. The purpose is to obtain a general idea of the age, significance and broader cultural meaning of the site that is to be lost and to store a sample that can be consulted at later date for research, education and promotion of our cultural heritage at large. Artefacts may be collected from the surface, or there might be excavation of representative samples of the artefactual and faunal and possibly botanical material to allow characterization of the site and dating. It may be necessary to record or even rescue rock art. The heritage resources authority will require a permit for any disturbance of the site.

Should further material be discovered during the course of development this must be reported to the archaeologist or to the heritage resources authority and the developer may need to give the archaeologist sufficient time to assess and document the finds and if necessary rescue a sample.

In situations where the area is considered archaeologically sensitive (e.g. coastal settings) the archaeologist must monitor all earth-moving activities.

Provincial Heritage Authorities may have further special requirements.

Permission for the development to proceed can be given only once the heritage resources authority has received and approved a Phase 2 report and is satisfied that measures are in place to ensure that the archaeological sites will not be damaged by the impact of the development and/or that they have been adequately recorded and sampled. Careful planning can minimize the impact of archaeological surveys on development projects by selecting options that cause the least amount of inconvenience and delay.

This process allows the rescue of information relating to our past heritage for present and future generations. It balances the requirements of developers and the conservation and protection of our cultural heritage as is required of SAHRA and the heritage resources authorities.

### 3.3. Phase 3

On occasion, a Phase 2 mitigation process may be followed by a Phase 3 programme involving the modification or conservation of the site (or parts of it) or the incorporation of the site into the development itself as a site museum or display. When sites are of public interest the development of interpretative material is recommended and adds value to the development. A Heritage Site Management Plan is usually required for sites that are to be retained to ensure that arrangements are made for the long term maintenance and management of the site(s) so that their heritage value and significance may be preserved. Where possible these should be legally tied into Homeowners Associations or some other body that can maintain the sites.

## 4. REQUIREMENTS FOR PERMITS

There are three points during development at which SAHRA or the relevant heritage resources authority may be approached for permission to disturb a site during the impact assessment process.

1. **'Shovel-Test Permits'**: in particular circumstances 'shovel-test' permits may be issued prior to or immediately after a Phase 1 survey (e.g. for testing the extent of coastal middens or collecting restricted ceramic samples for identification from Iron Age sites).

2. **'Mitigation Permits'**: these are generally issued for excavation or collection of samples and assess sites that will be impacted by the development. These are issued to the specialist before the Phase 2 study, and after assessment of the Phase 1 report.
3. **'Destruction Permits/Permission'** and/or **'Interpretation Permits'**: these are generally issued to the developer after assessment of the Phase 2 report (but are usually filled in by the archaeologist!). 'Interpretation Permits' refer to situations where the addition of boardwalks or notice boards may impact on the site and the permitting process allows for the proposed actions to be discussed and possibly modified to better protect the site(s).

The specialist should explain the process to the developer and should generally apply for the permit. Permission from the owner must be obtained and this is better done at the beginning of the process.

Policy relating to permit applications is explained in the *General Guidelines to Archaeological Permitting Policy* (available from SAHRA) and the applicant should also consult the legislation (including the *Government Gazette*<sup>2</sup>).

## 5. WHAT ABOUT THE PALAEOLOGICAL COMPONENT?

Palaeontological Impact Assessments are also required wherever palaeontological resources are threatened. This is especially necessary where there is disturbance of sedimentary strata or gravels that may include palaeontological remains.

Although the details of the Phase 1 Minimum Standards discussed below (s. 7.1) may not apply directly where these are specifically archaeological, these standards can be used as a general guide to what is needed in Phase 1 palaeontological reports. The minimum standards for Phase 2 reports discussed below (s.8.1) are more generic and apply to both archaeology and palaeontology.

As indicated above palaeontological collection may take place in the Phase 1 process and the practitioner should ensure that they have a valid permit for this. The development should not proceed until the heritage authority has approved the report.

## 6. AIAs AND PIAs AND THE NATIONAL INVENTORY

Phase 1 and Phase 2 AIAs and PIAs are very often the last opportunity we will ever have to record the remains or evidence of people who lived in this country before us, or the fossil record at the site. These records are immensely important to our understanding of the past and as such they form an important part of our National Estate. SAHRA is building up a national archive of these reports, in hard copy and where possible electronically and specialists are requested to ensure that SAHRA receives copies of all reports.

Developers or specialists are required to submit a copy of the report that goes to the relevant Heritage Resources Authority, usually the Provincial Heritage Resources Authority (PHRA). SAHRA will require a copy of these documents either from the specialist or the PHRA for record as part of the national inventory.

It is important that the quality of these reports is high, that they characterize and date the sites meaningfully and reflect best practice in terms of the identification, assessment, interpretation and management of our archaeological and palaeontological heritage.

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<sup>2</sup> *Government Gazette* Vol. 240, No. 21239.

## II. MINIMUM STANDARDS

### 7. PHASE 1 AIA REPORTS: MINIMUM STANDARDS

#### 7.1. Every Archaeological Impact Assessment Report must include:

##### A. Title Page with:

- a. A **Title** that identifies this report. It should give the name and geographical location of the site(s) and/ or project, including property or farm name (and magisterial district) and province;
- b. **Author(s) surname(s)** and details, company name and contact details;
- c. **Developer and consultant's** name (who commissioned the report), postal address, telephone and fax numbers;
- d. **Date of report** (including day and month).

##### B. Executive Summary including:

- a. The **purpose** of the study;
- b. A brief summary of the **findings**;
- c. The **recommendations**; and
- d. Any **stakeholders** or people responsible for decisions and actions.

##### C. Table of Contents, for reports longer than 10 pages.

##### D. Background Information on the Project with:

- a. Whether the report is part of a scoping report/ EIA/ HIA or not;
- b. Type of development (e.g. low cost housing project, mining);
- c. Whether re-zoning and/or subdivision of land is involved;
- d. Developer and consultant and owner and name and contact details;
- e. Terms of Reference;
- f. Legislative requirements.

##### E. Background to the Archaeological History and other relevant heritage components of the area with,

- a. Literature review or archival research sufficient to place the sites located in context;
- b. Reference to museum or university databases and collections;
- c. Previous relevant impact assessment reports for the area.

This background is required in part to anticipate or predict the kinds of heritage resources that might occur, and in part to gauge the regional significance of findings made during the current assessment.

##### F. Description of the Property or Affected Environment its setting and heritage resources, with:

- a. **Details of the area surveyed** including;
  - i. Full **Location Data** for Province, Magisterial District/Local Authority and property (e.g. farm/erf) name and number, etc.;
  - ii. **Location Map(s)/ orthophotos** of the general area. These must include the map name and number (e.g. 3318DC Bellville). Maps must include at least a 1:50 000 and (if

- available) also a 1:10 000 (i.e. most detailed possible). Large scale colour satellite photos make a useful addition. Maps should be preferably at least A4 in size.
- iii. Either the Location Map or the Site Map (see 7.1Gi below) must have the polygon of the **area surveyed** marked on it and full geographical co-ordinates for all relevant points and, where applicable, indication of the area to be developed (footprint). The report or map must indicate exactly what area was searched, and if any area was not searched why this was so; and what the probability is of sites being found there.
- b. **Description of the methodology** used including:
- i. How the area was searched (e.g. a three-person team for two days, and whether on foot or not!) and what, if any, sampling techniques were used;
  - ii. What the restrictions to the study were, for example:
    - visibility affected by high grass or bush or vegetation cover, walls or concrete surfaces;
    - physical or other impediments (e.g. vlei, swamp, steep kloof, mobile dune) to the assessment of the area;
  - iii. How the data was acquired, and details of research equipment (e.g. GPS).

## G. Description of Sites identified and mapped with:

- a. Details of the **location of all the sites** including:
  - i. Site Map or aerial photograph of the specific area with the location of all sites marked on it (at least A4 size). Make it clear how this relates to the Location Map described above (7.1Fii).
  - ii. GPS readings with the model and datum used (WGS 84 is considered the most useful). Please comment on the accuracy. If co-ordinates are read off the 1:50 000 map, please indicate this. Wherever possible the GIS track actually surveyed should be mapped.
- b. An adequate **description of each site** including:
  - i. Type of site (e.g. open scatter; shell midden, cave/shelter);
  - ii. Site categories (e.g. Earlier Stone Age, Late Iron Age);
  - iii. Context (detailed description of depositional history and environment);
  - iv. Cultural affinities, approximate age and significant features of the site;
  - v. Estimation or measurement of the extent (maximum dimensions) and orientation of the site(s);
  - vi. Depth and stratification of the site (where shovel test permits have been given or natural exposures available), both in the text and through photographs of sections;
  - vii. Possible sources of information about past environments, such as stalagmites/stalagmites, flowstone, dassie middens, peat or organic rich deposits and natural bone accumulations;and
  - viii. Photographs and diagrams, of good quality, with a centimetre scale (e.g. for artefacts) or metre scale (e.g. for large scale village plan) and a caption. Include a 'wide angle' photo of the sites.
- c. **Threats or sources of risk** and their impact on the heritage resources (e.g. earth moving, traffic of vehicles or humans, erosion).
- d. If the sites are in KwaZulu-Natal or the Northern Cape please apply to the old Archaeological Data Recording Centres at the Provincial Museums for **National Site Numbers** (for sites that will be conserved, excavated or collected).

## H. Description of the Artefacts, Faunal, Botanical or Other Finds and Features for each site.

Record meaningful information and consider supplying:

- a. Raw material, type, maximum dimensions and relative frequency of and significant attributes of stone tools observed on the surface;
- b. Basic description of ceramics, other artefacts and occurrences such as rock art;
- c. Description of features (e.g. hearths, bedding, walling);
- d. Basic description of faunal or botanical taxa and estimated frequencies;
- e. Adequate photographic and graphic representations (with scale in centimetres); and cross-reference photographs with a map showing where the objects in the photographs were found;
- f. Location of repositories at which artefacts, photographs, rock art tracings and field records (from other sites in the area) are kept.

## I. Clear Description of Burial Grounds and Graves with:

- a. Clear written and photographic description of any graves;
- b. Exact or estimated age and affinities of the burials;
- c. Clear discussion for the client of the legal implications (include reference to both the Act and the regulations for s.36<sup>3</sup>, and particularly the public participation process, and whether this should be done by the archaeologist or may be better done by a social consultant).

## J. Field Rating (Recommended grading or field significance) of the site:

While **grading** is actually the **responsibility of the heritage resources authorities**, all reports should include **Field Ratings** for the site(s) discussed (proposals for grading), to comply with section 38 of the national legislation, for example:

- a. National: This site is considered to be of Field Rating/Grade I significance and should be nominated as such (mention should be made of any relevant international ranking);
- b. Provincial: This site is considered to be of Field Rating/Grade II significance and should be nominated as such;
- c. Local: this site is of Field Rating/Grade IIIA significance. The site should be retained as a heritage register site (High significance) and so mitigation as part of the development process is not advised;
- d. Local: this site is of Field Rating/Grade IIIB significance. It could be mitigated and (part) retained as a heritage register site (High significance);
- e. 'General' Protection A (Field Rating IV A): this site should be mitigated before destruction (usually High/Medium significance);
- f. 'General' Protection B (Field Rating IV B): this site should be recorded before destruction (usually Medium significance);
- g. 'General' Protection C (Field Rating IV C): this site has been sufficiently recorded (in the Phase 1). It requires no further recording before destruction (usually Low significance).

## K. Statement of Significance (Heritage Value) giving the significant archaeological heritage value of relevant sites in terms of the legislation (NHRA, section 3 (3) listed below) or any other relevant criteria, and give reasons.

- a. its importance in the community, or pattern of South Africa's history;

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<sup>3</sup> National Heritage Resources Act (Act No. 25 of 1999) and the permit regulations (*Government Gazette* Vol. 240, No. 21239).



- b. its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- c. its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- d. its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- e. its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- f. its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- g. its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- h. its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa; and
- i. sites of significance relating to the history of slavery in South Africa.

#### L. Recommendations including:

- a. An assessment of the potential impact of the development on these sites, relative to sustainable social and economic benefits;
- b. Proposals for **protection or mitigation** relating to:
  - i. Possible alternatives in the development that might allow the protection and conservation of the sites; or
  - ii. The need for mitigation of adverse impacts; or
  - iii. The need to conserve certain sites because of their high heritage value.
- c. Detailed recommendations with regard to **burial grounds and graves**. This must inform the client about the full process and enable the heritage authority to make decisions about permits. This must include:
  - i. Recommendations for protection of the grave(s) during the development and in the long term, e.g. fencing and plans for maintenance (mini-management plan); OR
  - ii. Recommendations for relocation of the grave(s), public participation and possibly further archival research, or both (i & ii).
- d. An **indication of what must be done at each site**:
  - i. If the site is of Low<sup>4</sup> Significance (see Kg above) the recommendation may be that the site must be mapped, documented and then destroyed (with a permit / letter of permission / Record of Decision from the heritage authority);
  - ii. If the site is of Medium<sup>5</sup> Significance the recommendation may be for a measure of mitigation after which the site may be destroyed. Mitigation usually involves a requirement to collect or excavate a sample of the cultural and other remains that will adequately allow characterization and dating of the site. (The archaeologist will require a permit for the excavation and collection. If, after this mitigation significant archaeological residues or parts of sites remain, the archaeologist should request the developer to apply for a permit for destruction or fill in the application for them to sign!

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<sup>4</sup> or in rare circumstances Medium

<sup>5</sup> or in rare circumstances High

In this way the heritage resources authority can help the archaeologist ensure that the recommended mitigation takes place;

- iii. If the site is of High Significance the recommendation may be that it be formally graded and conserved (with provision of boardwalks, fencing, signage, guides) and protected as a heritage resource (either being listed on the Heritage Register or being declared as a Provincial or National Heritage Site).

If sites are to be protected a Site Management Plan should be required. For mini-plans, where small sites are incorporated into developments, this must include an indication of who is responsible for maintenance and how this process will be monitored.

## **M. Conclusions.**

**N. Bibliography** detailing citations in the text of the report. Remember that all sources should be adequately acknowledged (even the web).

**O. Appendices** if any.

## **7.2. Phase 1 Archaeological Reports: General Comments**

- a. Take into account:
  - i. That ephemeral sites may not be unimportant as they may represent the only trace on the landscape of a particular people or period and must be adequately sampled and described so as to supply important information about human settlement patterns.
  - ii. That bush clearing and construction work (e.g. access roads and camps) may have a strong negative impact on sites.
  - iii. That specialists are expected to assess the whole property or to indicate why only part of the property is to be affected by short term and long term effects of the development.
  - iv. The relative significance of sites identified in relation to current knowledge of sites in the general area.
- b. Indicate the location of any significant extra documentation or photographic material not included in the report itself.
- c. Provide information and recommendations to the client including the scope of the heritage legislation that applies; the need to apply for permits in good time before disturbing sites in any way; and the need for approval of the heritage authority before the destruction of sites that have been recorded.
- d. Give the Heritage Resources Authority enough information to assess with confidence whether those recommendations should be approved or modified and whether to issue permission for destruction of sites.
- e. Indicate whether an assessment of other heritage components (palaeontology, built environment, living heritage) are being commissioned by the developer, and if not whether this should be done.
- f. Make it clear to the developer that the final decisions rest with the heritage authority and that permission is required for destruction.

## **7.3. Phase 1 Reports on Particular Types of Archaeological Sites**

SAHRA and Heritage Western Cape are working independently (with experienced practitioners) on minimum standards and recommendations for particular types of sites or concerns. SAHRA has drafted recommendations for Shell Midden Sites and Suburban and Historic Sites and HWC has

finalized recommendations for Early Stone Age sites and Dating. In time these will be added as appendices.

## **8. PHASE 2 PERMIT MITIGATION REPORTS: MINIMUM STANDARDS**

### **8.1. Every Archaeo(/Palaeonto)logical Phase 2 Permit Report must include:**

#### **A. Title Page with:**

- a. A **Title** that indicates the name and geographical location of the site(s), including property name (possibly magisterial district) and province (please include key names already used in Phase 1 reports and permit applications!);
- b. **Author(s) name(s) and details**, company name and contact details;
- c. **Developer / consultant** name (if applicable);
- d. **Date** (and month);
- e. **Permit Number (NB!).**

#### **B. Executive Summary** including:

- a. The purpose of the work;
- b. A brief summary of the findings;
- c. The recommendations for the future of the site.
- d. Stakeholders.

#### **C. Table of Contents**, for reports longer than 10 pages.

#### **D. Background Information on the Project** (as applicable, see section 7.1.D above):

#### **E. Background to the Archaeological/ Palaeontological History** of the area,

- a. A literature review, archival research;
- b. Previous relevant work done in the area.

#### **F. Name and Geographical Location of the Site(s)** including:

- c. Name of site and full location data for property (e.g. farm/erf) name and number, etc., Magisterial District and Province;
- d. Location Map(s)/Orthophotos of the general area. These must include the map name and number (e.g. 3318DC Bellville). Maps must include at least a 1:50 000 and (if available) also a 1:10 000 (i.e. most detailed possible). They should be preferably at least A4 in size.
- e. Site Map(s) or aerial photograph(s) of the specific area showing the location of all sites (at least A5 size);
- f. GPS readings with the model and datum used (WGS 84 is considered the most useful); and with the accuracy attained.

#### **G. Description of the Work Done:**

- a. Site description (see also section 7.1 above).
- b. Methodology used (including number of people and their responsibilities. [Note: Spits must not be used in archaeological excavations if stratigraphy can be detected. No spits should be >100mm in depth, in the case of M/LSA excavations!])
- c. A written assessment of the work done including discussion of:
  - i. features and object(s), graves or fossils excavated or removed;
  - ii. conclusions reached regarding the site and its cultural (or, if palaeontological, its stratigraphic) affinities, approximate age and significant elements.
- d. Suitable illustration including:

- i. A detailed site plan on which excavated or collected areas are marked;
- ii. Table(s) categories of artefacts, fauna / fossils etc, excavated or removed;
- iii. Accurate scale drawings of the stratigraphy;
- iv. Photographs with a centimetre scale and a caption. Include a 'wide angle' photo and avoiding high contrast situations.
- e. Name of the Repository, that is, the institution curating the material and the field notes and records.

#### **H. Description of Artefacts, Faunal, Botanical, Other Remains / or Fossils** (see s. 7 above).

#### **I. Recommendations** including:

- a. Possible declaration as a heritage site;
- b. Conservation requirements for the site, e.g. fences boardwalks, etc (and the need for a permit);
- c. The need for Site Management Plan;
- d. Plans for or the need for interpretation and signage at the sites
- e. Any other recommendations pertaining to site.

#### **J. Conclusions.**

#### **K. Bibliography** detailing citations in the text of the report.

#### **L. Appendices** if any.

### **8.2. Phase 2 Permit Reports: General Comments**

- a. Remember that the objectives of Phase 2 Mitigations include:
  - i. Investigation of each potentially important site to establish significance and so determine the future of the site;
  - ii. Rescue of representative material from the site to allow us to record the nature of each site and establish its age before it is destroyed and to make samples accessible for future research;
  - iii. Interpreting the evidence recovered to allow for education of the public and promotion of heritage (which may form part of a Phase 3 project).
- b. Every permit holder must submit to the relevant Heritage Authority:
  - i. Annual '**Interim**' or progress Phase 2 permit report(s) which should be as comprehensive as possible and must:
    - reflect the full details about the location of the site and its setting;
    - the archaeological/palaeontological background;
    - a description of the work done (with photos, maps and diagrams); and
    - results to date.
  - ii. A systematic '**Final**' Phase 2 permit report (within one year of the expiry of a permit) including :
    - the above data; and full details of the excavation, collection, removal, analysis and interpretation of the material.
- c. Researchers are requested to remember that copies of all publications, reports and theses relating to material acquired in terms of a permit (even if the work is done by other researchers and students, and even if the final report is in) must be sent to the relevant heritage authority for assessment. Ultimately reports are required by SAHRA for the national heritage library.