



**POLICY ON THE IDENTIFICATION AND
CONSERVATION OF INITIATION SITES
IN THE WESTERN CAPE**

1. Introduction

1.1 HWC and DCAS

Heritage Western Cape (HWC) together with the Department of Cultural Affairs and Sport (DCAS) has drafted a framework within which Initiation Sites can be managed.

In terms of DCAS Initiation Sites Framework, the institution of initiation and its protection is a community's cultural, spiritual and religious right. The Constitution of the Republic of South Africa in the Bill of rights protects and advances these rights and imposes on all statutory and private bodies the obligation to promote and comply with the Bill of Rights

The goal of the DCAS framework is to create a safe and an enabling environment that will make possible effective rites of passage to responsible adulthood and citizenship.

1.2 Formally Identified Initiation Sites

A schedule of formally identified Initiation Sites is registered with HWC.

2. Formal Identification of Initiation Sites

Guidelines for the formal identification of Initiation Sites

The following guidelines are in place to assist in the formal identification of Initiation Sites. The criteria identified below (Table 1) must be satisfied before a site can be added to the schedule of formally identified initiation sites in 1.2 above.

Table 1: Criteria to be satisfied before a site can be added to the schedule

Element/Variable	Description/Question	Proposed Guidelines
Use or scale	Can there be provision for a few regional sites or must there rather be a smaller local site or is a combination best?	3-4 regional sites with smaller sites in each district
Locality	Can the site or sites be located outside the urban area and what is the maximum distance?	Not more than 5 km from community reached within 20 minutes by vehicle
Capacity	How many individuals can be accommodated on a site? What is the ideal density of a site	Between 16 and 20 huts per hectare. On average of 2 to 4 of individuals per hut.
Size	What is the minimum size for a site and if regional sites are selected, what is the ideal size?	3-7 ha -recommended
Services	What is the level of services that are required on the site? In light of the location in urban areas, consideration must be given to water and sanitation as a minimum as well as the proximity to health facilities	Wilderness sense of place Water and sanitation Refuse removal Proximity to health facilities
Site composition	What specific vegetation is required? Can the site be next to the sea? Must it be flat or can it be against a mountain?	High density and tall vegetation required in a geomorphologically flat area High density but shorter vegetation required next to the sea. Can be in flat or mountainous terrain
Access and Parking	Is vehicular access and parking required and should busses be able to get to the site? Emergency evacuation must be provided for in an appropriate manner.	No vehicular access is permitted into the site Vehicular access to the perimeter only Parking and Bus access required at the perimeter.
Ownership	Ideally the land should be owned by a public entity. If the land is privately owned, is there a need for a formal agreement with the landowner?	Whether the land is Public or Private, a formal heritage agreement in terms of Section 42 of the NHRA should be in place with the landowner for the use of the land for initiation sites. (See 2.2.2 and 2.2.3 below)
Privacy	Site should be private, both in terms of visibility and in terms of access	Screening Access control Buffer zones with height restrictions
Other	Can a site be shared by other users or for other uses such as urban agriculture etc.?	Co-use acceptable under specific and agreed upon terms Ecological biodiversity conservation

3. Protection of Initiation Sites

3.1 Section 38 of the National heritage Resources Act (Act 25 of 1999)

This section of the NHRA determines various categories of development and require that in these cases the developer is must notify HWC of such development. This may then trigger the requirement by the HWC of the submission of an Impact Assessment.

In terms of Section 38(1)(e), HWC may identify and declare by regulation any category of development that can trigger a process in terms of Section 38(1). Accordingly, in terms of the proposed HWC Regulation governing the declaration of Initiation Sites as a Special Category of Development, any proposed development that will impact on a site used for the practice of Initiation Rites will require a full Heritage Impact Assessment including extensive public participation as per Section 38(3) of the NHRA in order to identify known or existing Initiation Sites and to provide an opportunity for the establishment of new Initiation Sites for use by the affected community.

3.2 Municipal Spatial Development Framework (SDF)

In terms of Section 30 of the NHRA, at the time of the compilation or revision of a town or regional planning scheme or a spatial development plan, or at any other time of its choosing, or at the initiative of a provincial heritage resources authority, a planning authority shall compile an inventory of the heritage resources which fall within its area of jurisdiction and submit this inventory to the relevant provincial heritage resources authority.

Existing Initiation Sites are considered heritage resources in terms of this policy and therefore must be included in the inventory of a local authority in terms of Section 30 of the NHRA. Existing Initiation Sites do not need to be formally identified as per 1.2 above to be included in the inventory.

2.2.2 Heritage Agreements

For known initiation sites that exist on publicly or privately owned land, HWC may enter into a Heritage Agreement with landowners and/or with the users of these sites in terms of Section 42 of the National Heritage Resources Act (Act 25 of 1999) around the management of this heritage resource.

2.2.4 Sites under direct threat

Should an initiation site be threatened with development, an equivalent site that satisfies the criteria outlined in 2 above and 5 below must be provided before such development can be approved.

Should normal heritage intervention mechanisms fail to safeguard the site, and should no suitable alternative site be provided, HWC may Provisionally Protect an Initiation Site in terms of Section 29 of the National Heritage Resources Act (Act 25 of 1999).

4. Provision for the development of new Initiation Sites

4.1 Section 38 of the National heritage Resources Act (Act 25 of 1999)

For new proposed developments catering to people practicing isiXhosa, abeSotho and amaHlubi cultural rites, provision must be made for the establishment of new initiation sites to service the community in the development proposals.

4.2 Requirements

The following guidelines (Table 2) must be discussed with the relevant community representatives and Initiation Forums, as well as the DCAS Cultural Service, for the establishment of new Initiation Sites in any area;

Table 2: Guidelines to be discussed for the establishment of new Initiation Sites

Element/Variable	Description/Question	Possible Guidelines
Use or scale	Can there be provision for a few regional sites or must there rather be a smaller local site or is a combination best?	3-4 regional sites with smaller sites in each district
Locality	Can the site or sites be located outside the urban area and what is the maximum distance?	Not more than 5 km from community reached within 20 minutes by vehicle
Capacity	How many individuals can be accommodated on a site? What is the ideal density of a site	Between 16 and 20 huts per hectare. On average of 2 to 4 of individuals per hut.
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		Can be in flat or mountainous terrain
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Ownership	Ideally the land should be owned by a public entity. If the land is privately owned, is there a need for a formal agreement with the landowner?	Whether the land is Public or Private, a a formal heritage agreement in terms of Section 42 of the NHRA should be in place with the landowner for the use of the land for initiation sites.
Privacy	Site should be private, both in terms of visibility and in terms of access	Screening Access control Buffer zones with height restrictions
Other	Can a site be shared by other users or for other uses such as urban agriculture etc.?	Co-use acceptable under specific and agreed upon terms Ecological biodiversity conservation

5 Sharing of Information

5.3 Between HWC and the Cultural Service

- 5.3.1 The Cultural Service will inform HWC of all new identified sites and provide their geospatial information. These sites will be mapped and included in the heritage GIS layer for the Western Cape.
- 5.3.2 HWC will inform the Cultural Service of any new proposed initiation sites identified through Sections 30, 31 and 38 of the National Heritage Resources Act (Act 25 of 1999).

5.2 With the public

- 5.2.1 Sites can be mapped, but must not identify the users of the sites, nor the times during which the sites are in use.
- 5.2.2 Community representatives and registered Initiation Forums must be encouraged to register as Heritage Conservation Bodies in terms of section 25(1) b of the NHRA.