



4 October 2021

To whom it may concern

LETTER FOR HIA EXEMPTION REQUEST: PROPOSED DECOMMISSIONING AND CLOSURE OF THE FE-CR WASTE DISPOSAL FACILITY AT TRANSALLOYS (PTY) LTD IN EMALAHLENI (WITBANK) WITHIN NKANGALA DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE

The above-mentioned project refers. The project site is located on the farms Elandsfontein 309 JS and Schoongezicht 308 JS. The applicable site is situated on Schoongezicht, and in the south-west of the Transalloys property (Figure 1).

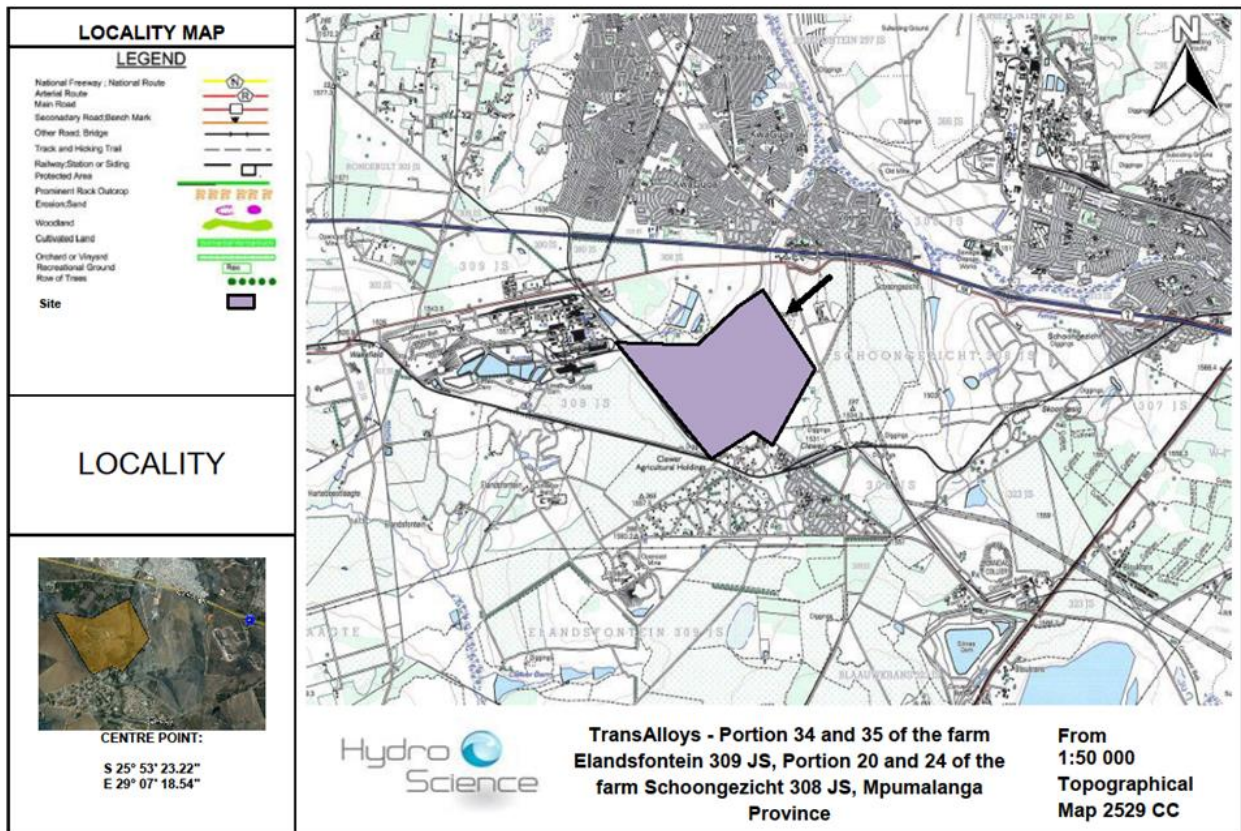


Figure 1: Locality of the site in the Mpumalanga Province (Hydro Science).

The Fe-Cr Waste Disposal Facility (WDF) (Figure 2-4) was established in 2006/7 when material was reprocessed historically (by the previous operator: pre 2008). A separate storage and disposal facility was required for the Fe-Cr material which was produced then. This Fe-Cr facility has not been operated / used by Transalloys (Pty) Ltd for disposal for more than ten (10) years.

Reason for decommissioning & closure: Since Transalloys has not been producing Fe-Cr for the last 20 years, the Fe-Cr facility is not required to remain active. Transalloys (Pty) Ltd intends to decommission and/or permanently close this facility as it currently remains an environmental liability.

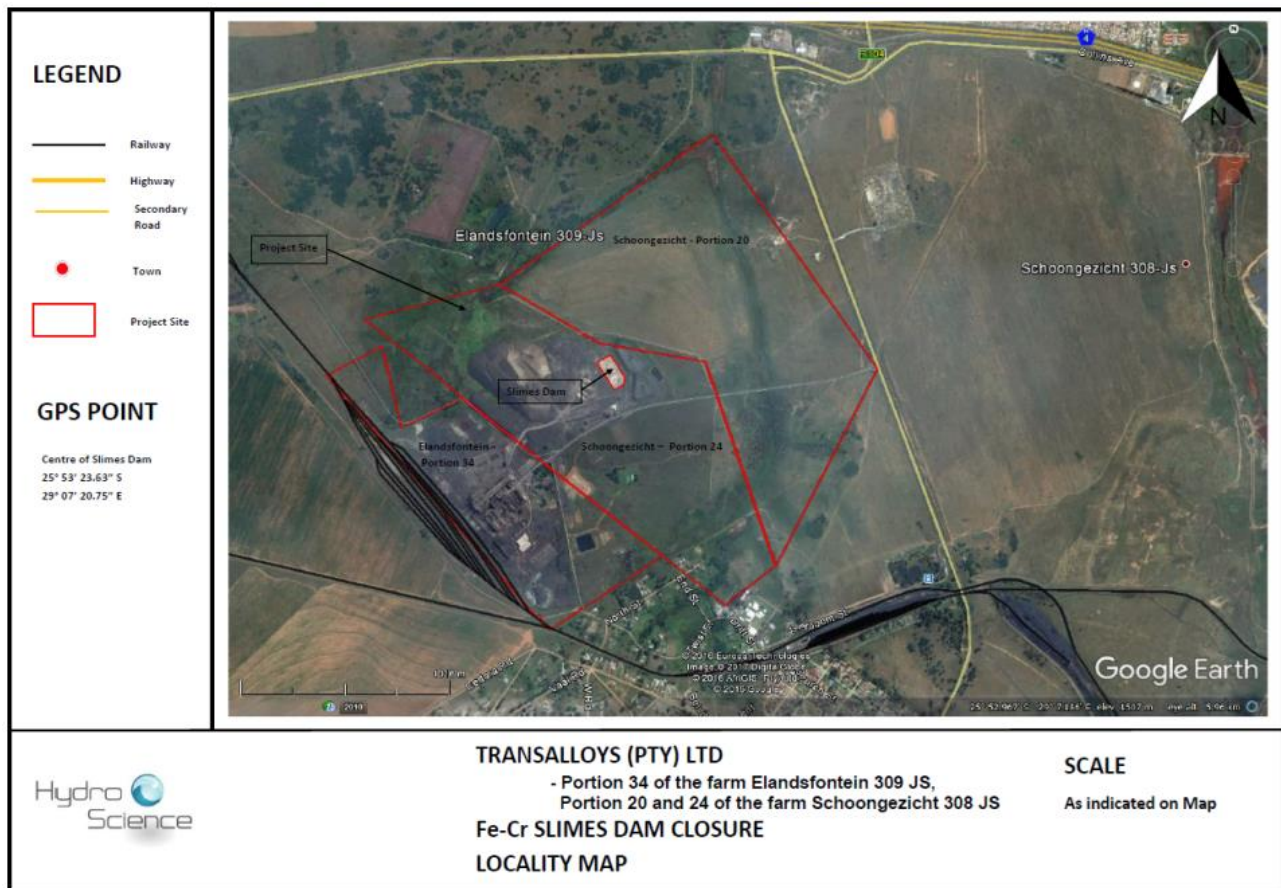


Figure 2: Location of the WDF (orange outline) within the Transalloys site (red outline) (Hydro Science).



Figure 3: Closer view of WDF (orange outline).

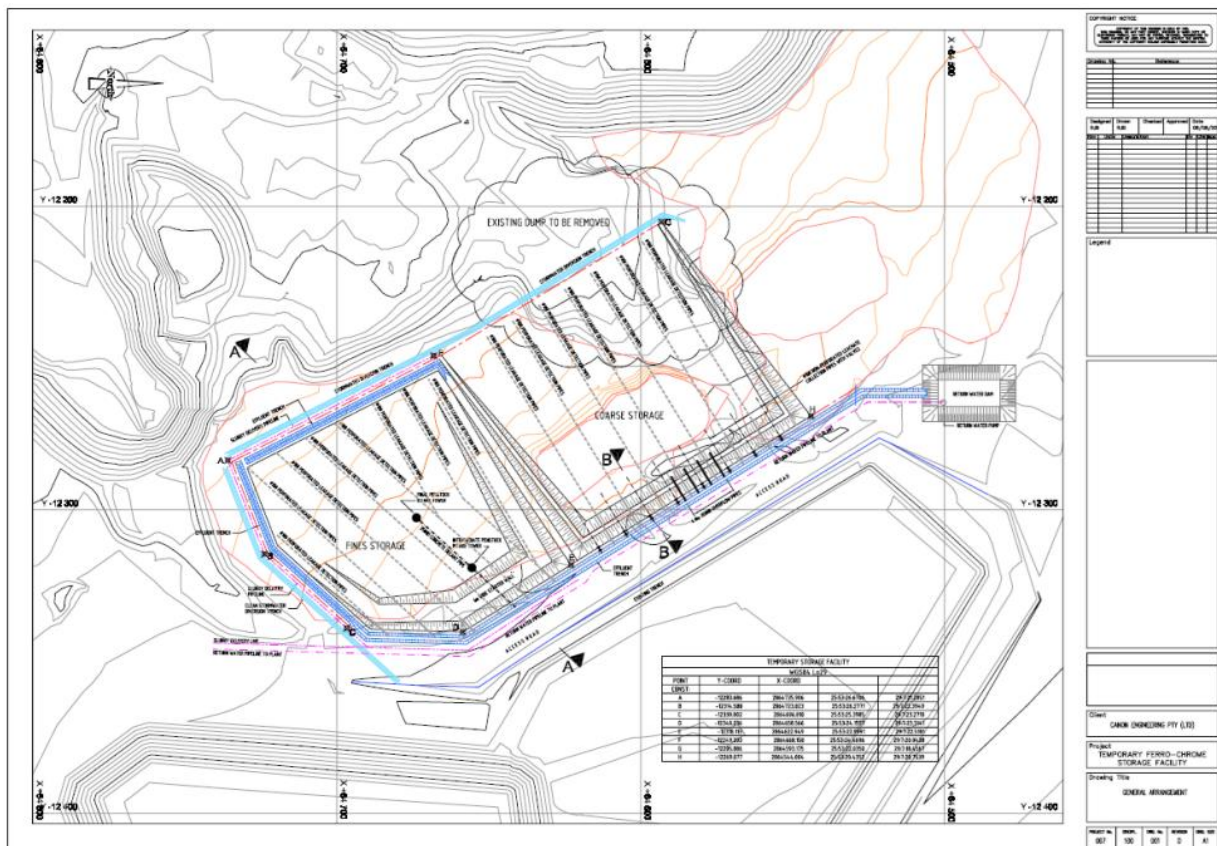


Figure 4: Layout of the WDF.

A HIA must be done under the following circumstances:

- a. The construction of a linear development (road, wall, power line, canal etc.) exceeding 300m in length.
- b. The construction of a bridge or similar structure exceeding 50m in length
- c. **Any development or other activity that will change the character of a site and exceed 5 000m² or involve three or more existing erven or subdivisions thereof.**
- d. Re-zoning of a site exceeding 10 000 m².
- e. Any other category provided for in the regulations of SAHRA or a provincial heritage authority.

The site was studied via Google Earth images and photographs provided by the client. It is my opinion that the project may be exempted from doing a Heritage Impact Assessment (HIA). The following is applicable:

- The site has been entirely disturbed due to formal industrial activities.
- No natural vegetation exists.
- There are no buildings on the WDF site (see photographs in Appendix B).
- The site will be decommissioned and thus no new development is being planned
- A HIA was done on the entire site in 2014 (Van Vollenhoven & Collins 2014).¹ During this survey, no sites were identified in the area now proposed for the development.

It needs to be mentioned that during the mentioned survey one grave yard was identified. This site lies approximately 500 m east of the WDF site. No impact is foreseen (Figure 5). For the grave site, a management plan was also compiled in 2015 (Van Vollenhoven 2015).² The site is managed in terms of this management plan and is thus mitigated by constant inspection and monitoring protocols. It is therefore believed that the proposed closure of the WDF will also not have an impact on the graves.

One Grade II (Provincial) heritage site is known in the vicinity. It is the old Clewer Railway Station, dating back to the days of the NZASM Railway in the 1890's. The site is located 1,6 km south-east of the WDF (Figure 5) and thus there will be no impact. In fact, it will likely result in less dust in the general vicinity of Transalloys. It is therefore believed that the closure will rather have a positive than a negative impact on the railway site.

¹ Van Vollenhoven, A.C. & Collins, Z. 2014. **A report on a cultural heritage impact assessment for the proposed development at Transalloys on portion 34 of the farm Elandsfontein 309 JS and portions 20 and 24 of the farm Schoongezicht 308 JR, close to eMalahleni, Mpumalanga Province** (Unpublished report, Groenkloof, Archaetnos).

² Van Vollenhoven, A.C. 2015. **A conservation management plan for the Transalloys (Pty) Ltd grave site, situated near eMalahleni, Mpumalanga Province** (Unpublished report, Groenkloof, Archaetnos).



Figure 5: Location of development site (orange outline) in relation to the grave site and the Clewer Railway Station.

In light of these factors, the chances of finding any heritage related features are indeed extremely slim, if any. This letter serves as an exemption request to the relevant heritage authority.

The developer should, however, note that due to the nature of archaeological material, such sites, objects or features, as well as graves and burials may be uncovered during construction activities on site. In such a case work should cease immediately and an archaeologist should be contacted as a matter of urgency to assess such occurrences.

Recommendation:

That the development be exempted from doing an HIA.

I trust that you will find this in order.

Yours faithfully

Prof AC van Vollenhoven: Director