



19 March 2021

To whom it may concern

LETTER FOR HIA EXEMPTION REQUEST: THE PROPOSED EXPANSION OF THE CHEMICAL PLANT AT BUSHVELD VANCHEM, CLOSE TO EMALAHLENI, MPUMALANGA PROVINCE

The above-mentioned project refers. The project entails the proposed expansion of the Chemical Plant at Bushveld Vanchem to install another two (2) reactors / tanks of 60m³ each as well as a filter press on Erf 94 in Ferrobank, eMalahleni Local Municipality, Nkangala District Municipality, Mpumalanga Province. The location of the tanks is at 25°51'55.76"South & 29°09'52.61" East (Figure 1-4).

The tanks have a footprint of $\pm 300\text{m}^2$. The objective of the project is the Chemical Plant expansion to use the pregnant solution produced by Kiln 3 in the Chemical Plant while the Oxide Section is not operational.

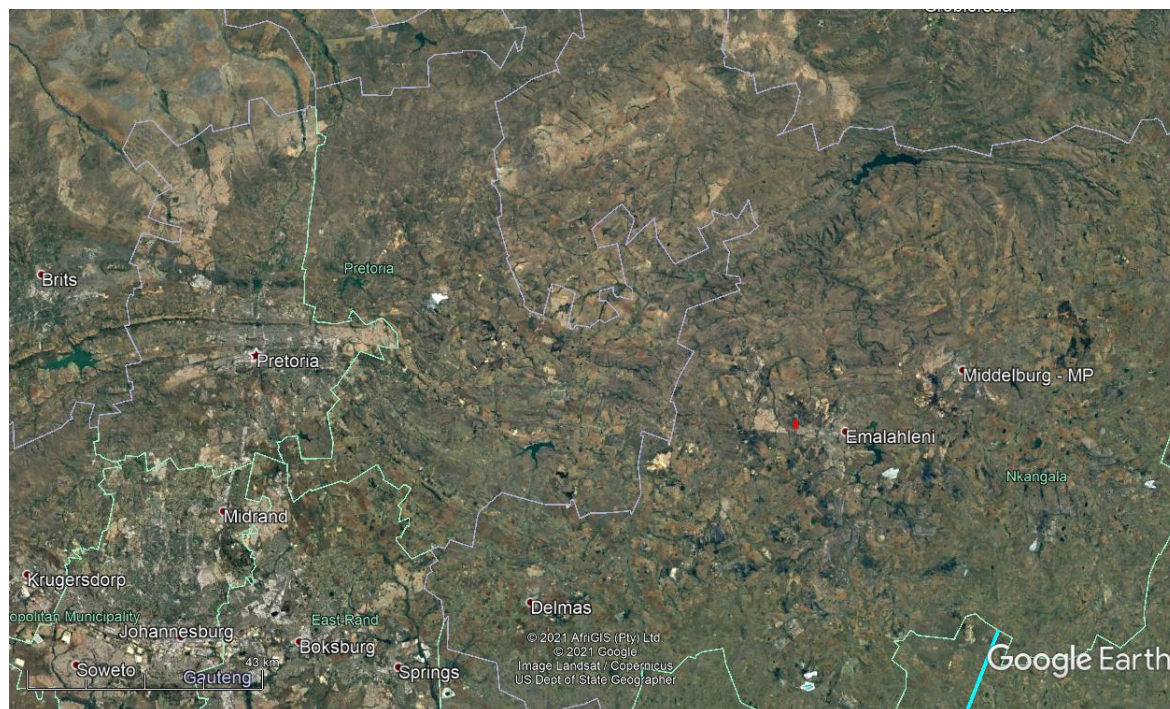


Figure 1: Locality of eMalahleni in the Mpumalanga Province.

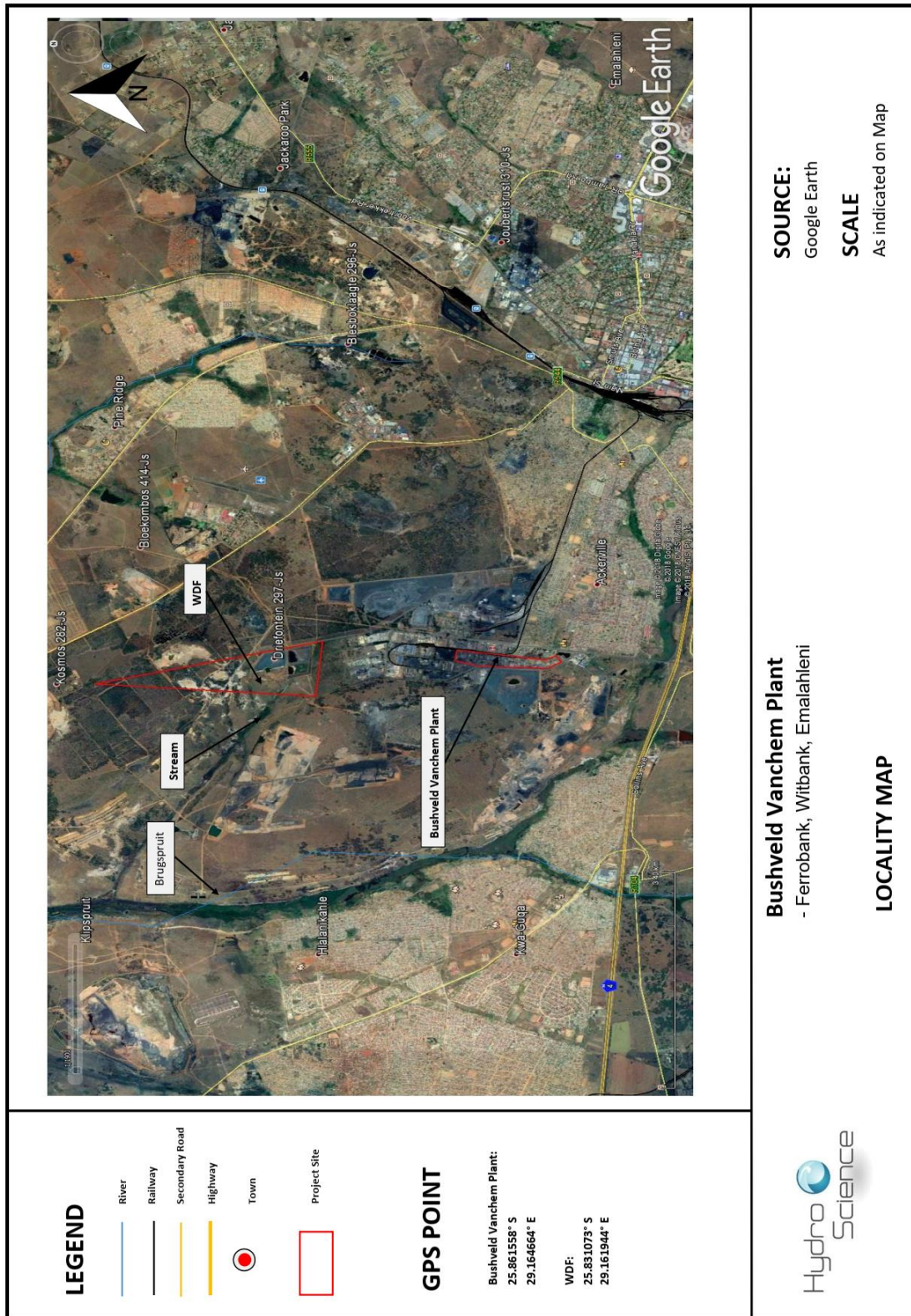


Figure 2: Location of the site (Hydro Science).

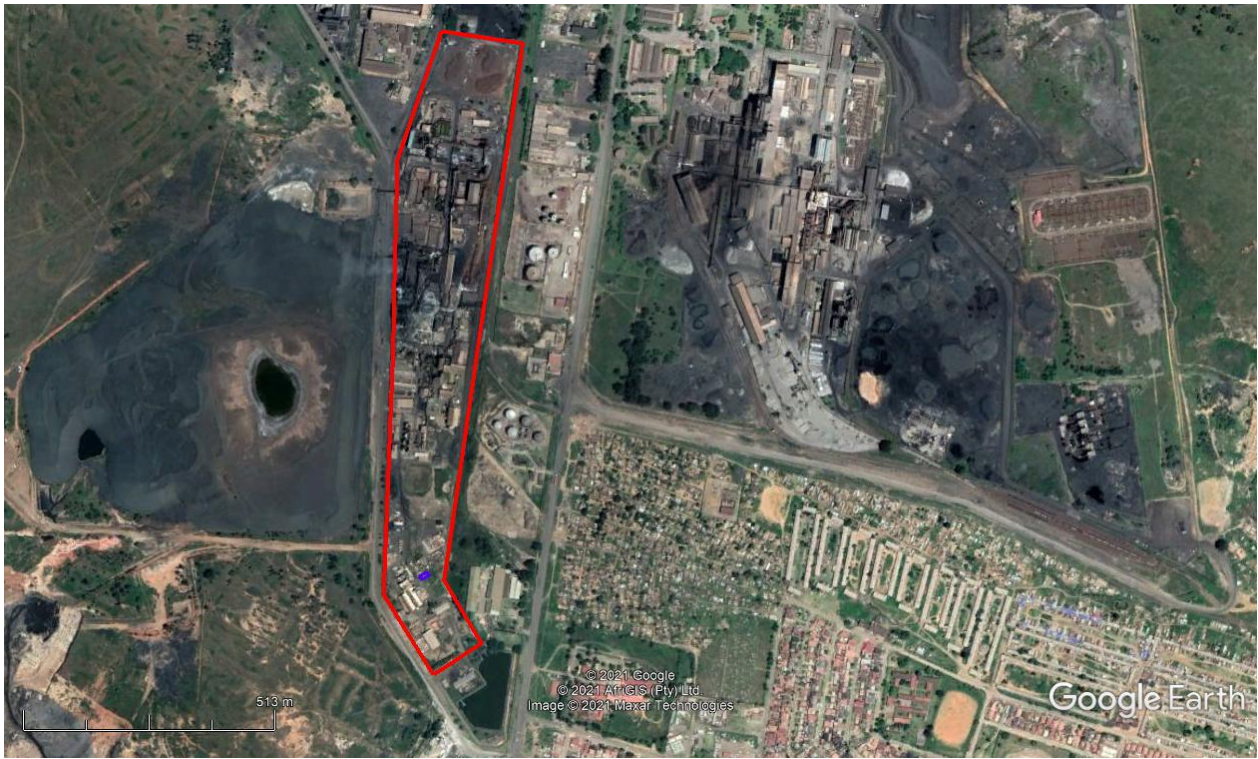


Figure 3: Location of the proposed position for the tanks (blue) within the project site.



Figure 4: Detailed view of the site.

An 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.
- Almost no natural vegetation exists. Vegetation consists of pioneer species such as grass, a clear indication of former disturbance.
- There are no buildings on the project site (Figure 5-7).
- The Environmental Screening tool indicates it as being a low risk site for heritage.



Figure 5: General view of the site.



Figure 6: Another view of the site. Note the infrastructure on site.



Figure 7: Note pioneer vegetation and infrastructure on site.

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.

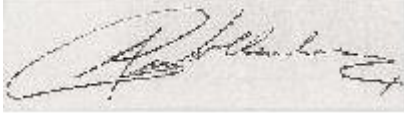
The developer should however note that due to the nature of archaeological material, such sites, objects or features, as well as graves and burials may be uncovered during construction activities on site. In such a case work should cease immediately and an archaeologist should be contacted as a matter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

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read 'A.C. van Vollenhoven'.

Prof AC van Vollenhoven: Director