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CaseID: 15808

Date: Friday July 23, 2021

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Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Gideon Raath

Savannah Environmental (Pty) Ltd

Environmental Impact Assessment Process for the Fodere Titanium Zero Waste Recovery Solution and associated infrastructure near Kwa-Guqa Mpumalanga Province

Anglo African Metals (Pty) Ltd is proposing to establish the Fodere Titanium Zero Waste Recovery Plant and its associated infrastructure near KwaGuqa, in the eMalahleni Local Municipality, of the Mpumalanga Province. It will be located on Portion 48 of the farm Elandsfontein 309 JS, the total area of the plant will be 4 hectares, in the EVRAZ High Steel and Vanadium Property. The proposed new plant will consist of the construction of a chemical plant storage area, mill and crushing plant, slag stockpile area, as well as a substation, plant utility area, admin and security area and parking lot.

Savannah Environmental (Pty) Ltd has been appointed to undertake an environmental assessment as part of the Scoping and Environmental Impact Reporting process in support of an Environmental Authorisation (EA) in terms of the National Environment Management Act, Act 107 of 1998 (NEMA) for activities that trigger the NEMA EIA 2014 Regulations. As well as an Environmental Management Plan as per the requirements of the Minerals and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended).

A Heritage Scoping report by PGS Heritage (Pty) Ltd has been submitted to SAHRA for commenting in terms of section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). and the PIA report is by Prof M Bamford has also been submitted.

Fourie, W. October 2020. Heritage Scoping Report. Zero-Waste Recovery Plan, Mpumalanga Province.

The study area has been disturbed by existing processing activities in the EVRAZ property, however initial deskbased assessment cannot rule out the potential impacts to heritage resources in the area. In addition, the proposed development area is located in a Very High Palaeontological sensitive zone and according to the SAHRIS palaeomap policy, a field based Palaeontological Impact Assessment is required.

The SAHRA issued an Interim Comment dated 04/01/2021 endorsing the recommendations of the Heritage Scoping report. The HIA report by PGS Heritage and Palaentological Desktop study report by Banzai



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Environmental were submitted on 29/05/2021.

Fourie, W. March 2021. Anglo African Metals Zero Waste Recovery Plant, Mpumalanga Province. Heritage Impact Assessment.

There are heritage resources located close to the study area but not within the development footprint area, the development footprint has been changed over time by industrial activities. The author assessed the overall impact to heritage resources by the development to be low, and recommends chance finds procedures to be implemented during construction.

Butler, E. March 2021. Palaeontological Desktop Assessment For The Proposed Anglo African Metals Zero Waste Recovery Plant In The Highveld Industrial Park No 1230 JS, Emalahleni Local Municipality Within The Nkangala District Municipality In Mpumalanga.

The study area is entirely underlain by undifferentiated rocks of the Vryheid Formation, Ecca Group, Karoo Supergroup. The Palaeosensitivity of this formation is Very High; however, due to the extensive disturbance of the landscape and the small extent of the development footprint the author assessed it to be of medium significance. The author recommends the following:

If any fossils are identified during any phase of construction then the Chance Finds Procedure (under section 11) must be implemented by the Environmental Officer (EO) in charge of monitoring this development.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the HIA report and Palaeontological Desktop Study and the recommendations provided in both reports. The SAHRA has no objection to the development going ahead on the following conditions:

If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Officer (EO) in charge of these developments must be informed. These discoveries ought to be protected and the ECO must report to SAHRA.

In the event that fossils are uncovered during construction then construction must cease within the immediate vicinity, a buffer of 30 m must be established, and a palaeontologist called in to inspect the finds. The palaeontologist must obtain a section 35(4) permit in terms of NHRA and Chapter IV NHRA Regulations, before any fossils are collected.

**Fodere Titanium Zero Waste Recovery Solution and associated infrastructure
near Kwa-Guqa Mpumalanga Province**

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If there are any new heritages resources are discovered during construction and operation phases of the proposed development, then a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings at the expense of the developer.

If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required at the expense of the developer. Mitigation will only be carried out after the archaeologist or palaeontologist obtains a permit in terms of section 35 of the NHRA (Act 25 of 1999). You may contact SAHRA APM Unit for further details: (Nokukhanya Khumalo/Phillip Hine 021 202 8654).

If any unmarked human burials are uncovered and the archaeologist called in to inspect the finds and/or the police find them to be heritage graves, then mitigation may be necessary and the SAHRA Burial Grounds and Graves (BGG) Unit must be contacted for processes to follow (Thingahangwi Tshivase/Mimi Seetelo 072 802 1251).

The Final EIA and its appendices must be submitted to the case and once a Record of Decision from the competent authority is issued, it must also be submitted to the case.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokukhanya Khumalo
Heritage Officer
South African Heritage Resources Agency

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Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/546264>

(DEA, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.