



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Nokukhanya Khumalo

Tel: 021 462 4502

Email: nkhumalo@sahra.org.za

CaseID: 16334

Date: Thursday June 03, 2021

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## Final Comment

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

Attention: Bushveld Vanchem (Pty) Ltd

**The proposed expansion of the Chemical Plant at Bushveld Vanchem to install additional two (2) tanks of 60m<sup>3</sup> each as well as a filter press on Erf 94 in Ferrobank, eMalahleni Local Municipality, Nkangala District Municipality, Mpumalanga Province. Changes: Two (2) tanks Capacity: 2 X 60m<sup>3</sup> = 120m<sup>3</sup>. Content: Pregnant solution (dangerous good) to be processed to produce ammonium vanadate (AMV). Supporting structures: • 5 Ton hoist mounted under roof to service the two tanks • Filter press • Electrical cables to existing substation • Overland pipeline connection to existing Larox Filter • Modification / conversion of Barren Tanks to serve as Settling tanks Objective: To use the pregnant solution produced by Kiln 3 in the Chemical Plant.**

Bushveld Vanchem (Pty) Ltd have appointed Hydroscience cc (Pty) Ltd to undertake a Scoping and Environmental Impact Assessment application process in support for an Environmental Authorisation (EA) in terms of the National Environmental Management Act, Act no 107 of 1998 (NEMA) as amended, for activities that trigger the NEMA Environmental Impact Assessment (EIA) 2014 Regulations, as amended.

The Bushveld Vanchem chemical plant is located on Erf 94 of the farm Ferrobank JS in eMalahleni Local Municipality of Mpumalanga Province. They proposing to install two additional 60m<sup>3</sup> tanks to store dangerous goods that will be used in their process to produce ammonium vanadate.

A Heritage Impact Assessment (HIA) by Archætnos Culture and Cultural Resources Consultants cc report has been submitted to SAHRA for commenting in terms of section 38 of the National Heritage Resources Act, no. 25 of 1999 (NHRA).

*Van Vollenhoven, A. March 2021. Letter for HIA Exemption Request: The Proposed Expansion of the Chemical Plant at Bushveld Vanchem, close to Emalahleni, Mpumalanga Province.*

The author conducted a desktop survey of the available information of the development located and noted that the landscape has changed due to existing industrial use. The author recommends an exemption from undertaking a field assessment and a disclaimer on the subsurface nature.

# The proposed expansion of the Chemical Plant at Bushveld Vanchem eMalahleni Local Municipality Mpumalanga Province.

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It is noted that a Palaeontological exemption letter was not submitted along with the heritage exemption letter. However, SAHRA grants the development an exemption from undertaking any assessment of impacts on palaeontological resources.

## Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) accepts the heritage exemption letter. Furthermore, we grant the development from undertaking an assessment of impacts to palaeontological resources. 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.

The ECO must obtain training in identifying fossils that may occur in the region.

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.

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).

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This comment must be forwarded to the relevant competent authority. Once a Record of Decision from the competent authority is issued, it must also be submitted to the case.

This comment was amended to remove references to the recommendations from the BGG Unit.

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

Yours faithfully

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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/569512>

(DARDLEA, Ref: )

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.

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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.