



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 20245

Date: Friday January 13, 2023
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Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Sappi Southern Africa (Pty) Ltd

PO Box 31560
Braamfontein
2017

Sappi Southern Africa Limited (Sappi) operates a pulp and paper Mill in Ngodwana, Mpumalanga Province. Due to growth aspirations of Sappi, Sappi Ngodwana (25°34'40.53"S 30°39'52.72"E) is proposing to produce additional packaging volumes on the existing Paper Machine #2 (PM2). Various mill expansion options are being considered, and these will include changes to the following infrastructure and/or processes at the Mill: soft wood storage area, Fibre Line #2, Fibre Line #3, Refibre Plant, Chemical Recovery Furnace and the Turbine House.

Thank you for notifying SAHRA of the proposed Environmental Authorisation (EA) Application for various Mill Expansion options at the Sappi Ngodwana Mill, at Ngodwana, Mpumalanga Province.

As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations as amended, it is incumbent on the developer to ensure that an application specific **Heritage Impact Assessment** (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA. This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted **as part of the** EA Application in terms of NEMA and the NEMA EIA Regulations.

SAHRA requests that an assessment of the impacts to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as part of the EA process.

The assessment must include an assessment of the impact to archaeological and palaeontological resources. The assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see www.asapa.co.za or www.aphp.org.za for a list of qualified archaeologists).

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The standards also refer to a Letter of Recommendation for Exemption for further assessment should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.

The proposed development is located within an area of moderate Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a desktop Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist. (See <https://www.palaeosa.org/heritage-practitioners.html> for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments. The standards also refer to a Letter of Recommendation for Exemption for further assessment should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

Further comments will be issued upon receipt of the draft BAR documents inclusive of appendices.

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

Yours faithfully

Natasha Higgitt
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/609897>
(DARDLEA, Ref:)