

Our Ref:



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: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20935

Date: Monday April 24, 2023
Page No: 1

Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Samancor Middelburg Ferrochrome (Pty) Ltd

Hendrina Road
MIDDELBURG
1050

Proposed upgrade of the existing M3 and M4 furnaces, and PSP to increase the current production rate. In addition, pre-heaters will be installed for the M3 and M4 furnaces and the gas abatement equipment for the M3 furnace and PSP will be upgraded.

WSO Group Africa (Pty) Ltd has been appointed by Samancor Chrome to undertake an Environmental Authorisation (EA) application for the upgrading of the M3 and M4 Furnaces, PSP and associated abatement infrastructure and installation of pre-heaters at the Middelburg Ferrochrome site, in Middelburg, Mpumalanga Province.

A Draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. The proposed upgrade includes increasing the capacity of the existing furnaces and Pelletising and Sintering Plant. In addition, pre-heaters will be installed for the furnaces and the gas-abatement equipment for M3 furnace will be upgraded. The activities are limited to the existing operational plant footprint which is noted to be 59 years old. It must be noted that structures older than 60 years are protected by section 34 of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and this includes South Africa's industrial heritage structures.

The DBAR includes management measures for heritage resources (page 99 and 100).

Final Comment

As SAHRA has failed to provide comments within the NEMA EIA timeframes, SAHRA cannot impose further studies. SAHRA advises the applicant of the following:

- The applicant is advised to conduct an audit of the development area to identify features that may become protected in terms of section 34 of the NHRA from 2024 and consult with the Mpumalanga

Our Ref:



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: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20935

Date: Monday April 24, 2023
Page No: 2

Provincial Heritage Resources Authority for additional guidance;

- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA (Natasha Higgitt 021 201 8660) must be alerted as per section 35(3) of the NHRA. Permits in terms of section 35(4) of the NHRA may be required to mitigate impacts to such resources. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Permits in terms of section 36(4) of the NHRA may be required to mitigate impacts to such resources. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- See section 51(1) of the NHRA regarding offences;
- If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final BAR must be submitted to the SAHRIS application for record purposes;
- The decision regarding the EA application must be submitted to the SAHRIS application for record purposes.

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
Manager: Development Applications Unit

Our Ref:



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: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20935

Date: Monday April 24, 2023
Page No: 3

South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/615396>
(MDARDLA, 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.