



Our Ref: 9/2/228/0001

Enquiries: Andrew Salomon  
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CaseID: 2385

Date: Thursday June 27, 2013

Page No: 1

## Letter

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

Attention: Miss Samantha Scott  
Synergistics Environmental Services  
Block B, Hurlingham Office Park  
59 Woodlands Avenue  
Hurlingham Manor  
2070

**Scaw South Africa (Pty) Ltd owns and operates the Scaw Metals facility at Union Junction in Germiston, Gauteng. Scaw Metals produces a range of products from the recycling of scrap steel and iron ore. Scaw South Africa has proposed the development of an Electrical Co-generation Plant and an Ash Disposal Facility at Scaw Metals, Union Junction. The proposed Co-generation Plant will be located on Erfs 133 & 632 and the proposed Ash Disposal Facility will cut across Erfs 133, 632, & 634 at Scaw Metals. Estimates of the proposed area to be covered by the Co-generation Plant is approximately 3 ha and by the Ash Disposal Site is approximately 17 ha. Approximately half of the area for the Ash Disposal Site is located with the footprint of the existing plant. These estimates are the proposed footprint of each facility only. In addition, the location chosen for these sites are already heavily disturbed within the Scaw Metals industrial area and have been used for a variety of activities, such as rail sidings, material borrowing, & waste storage. The proposed facilities are considered together in the Scoping and EIA process, therefore we would like SAHRA to consider both projects together in this application.**

Thank you for your notification regarding this development.

In terms of the National Heritage Resources Act, no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that prior to development it is incumbent on the developer to ensure that a **Heritage Impact Assessment** is done. This must include the archaeological component (Phase 1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required.

The quickest process to follow for the archaeological component is to contract an accredited specialist (see the web site of the Association of Southern African Professional Archaeologists [www.asapa.org.za](http://www.asapa.org.za)) to provide a Phase 1 Archaeological Impact Assessment Report. This must be done before any large development takes place.

The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38) about the process to be followed. For



The South African Heritage Resources Agency

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Page No: 2

example, there may need to be a mitigation phase (Phase 2) where the specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of the sites.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary.

If the property is very small or disturbed and there is no significant site the heritage specialist may choose to send a letter to the heritage authority to indicate that there is no necessity for any further assessment.

Any other heritage resources 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.

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

Yours faithfully

Andrew Salomon  
Heritage Officer: Archaeology  
South African Heritage Resources Agency

Colette Scheermeyer  
SAHRA Head Archaeologist  
South African Heritage Resources Agency



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Page No: 3

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/120037>



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