



**Attention      Bernadet Pawandiwa**

Dear Ms Pawandiwa

**Application for Exemption from a  
Phase 1 Heritage Impact Assessment of  
Proposed Decommissioning of the Legacy Landfills at  
The Bayside Aluminium Smelter,  
Richards Bay, KwaZulu-Natal, South Africa**

**Project description**

Aluminium South Africa (ASA) is currently proposing to decommission the Bayside Smelter (known as Project Alpha). The Bayside operations are located on approximately 134ha of land in Richards Bay. The decommissioning and remediation of contaminated land (Project Alpha) at the Bayside Smelter may require any or all of the following broad activities, depending on decisions that get made regarding the final state of the closed site:

- Removal of mechanical and electrical installations from the buildings and from the site;
- Cleaning of the buildings (high pressure wash down and possibly steam cleaning);
- The possible continuance of the existing Casthouse operation with a transfer of ownership to another party;
- Destruction and removal of some or all physical infrastructure – this could include blasting;
- Closing existing 'landfills' (more accurately waste disposal areas, these are unlicensed areas, although two areas have closure permits) (Figure 2). This will likely see the removal of the materials in the 'landfills' for disposal at a registered hazardous waste landfill;
- Treatment of contaminated land; this may see the complete removal of the contaminated soil or the in-situ treatment of the soil or some combination of the two approaches but within the prescription of the recently promulgated 'National Norms and Standards for the Remediation of Contaminated Land and Soil Quality'; and,
- Landscaping of the land that has been cleared of physical infrastructure.

## Site location

The coordinates of the approximate centre of the proposed development site are S28° 47' 14.5" E32° 00' 50.9" (Figures 1 and 2).

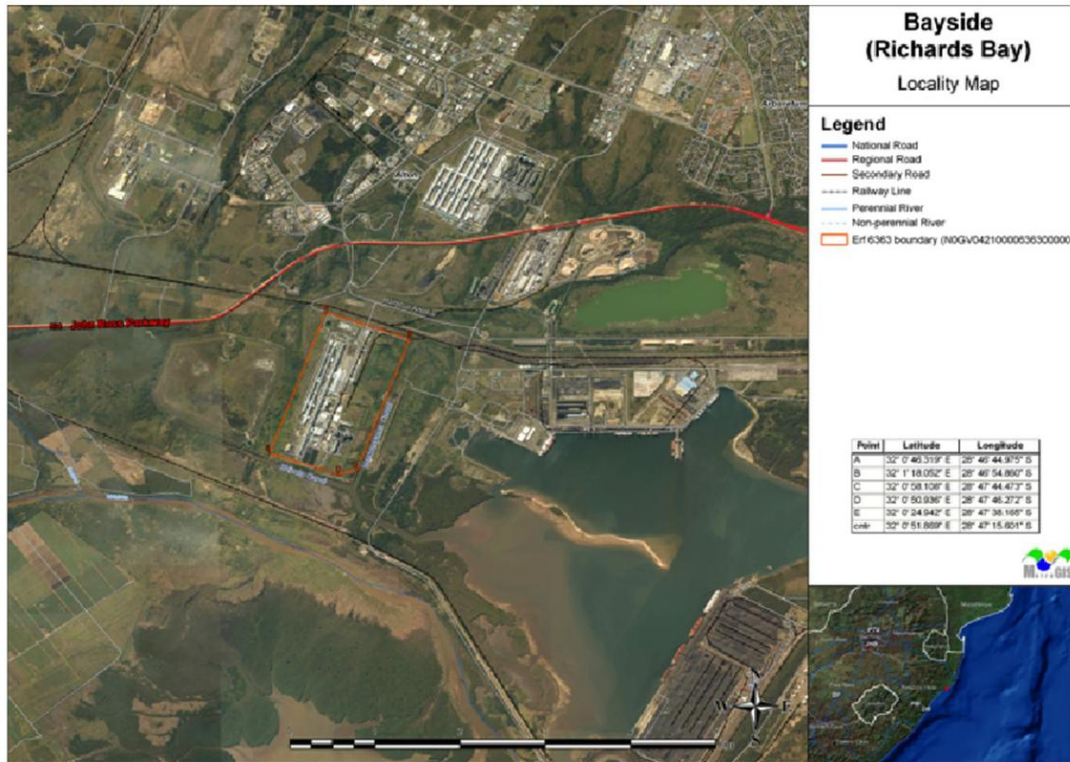


Figure 1: Locality map of the Bayside Smelter in Richards Bay.



Figure 2: Aerial view of the Bayside Smelter in Richards Bay, highlighting the locations of all of the legacy 'landfill' areas.

## Site assessment and recommendations

The proposed development site has been subject to decades of severe environmental disturbance associated with the construction and operation of a heavy industrial development. Furthermore, the site comprises former swampland that would never have been chosen for human settlement or activities. Although the area has a low to moderate palaeontological sensitivity, the degree and scale of environmental transformation, and the nature of the proposed activities, indicate that it is highly unlikely that palaeontological remains of any significance will be encountered.

Accordingly, we request that Amafafa grant an exemption from an HIA for this activity, allowing the project to proceed with no further heritage resource mitigation.

Yours sincerely



Len van Schalkwyk and Elizabeth Wahl