



# Transalloys (Pty) Ltd

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27 June 2023

## South African Heritage Resources Agency (SAHRA)

111 Harrington Street  
Cape Town  
8001

Dear Ms Higgitt,

**SUBJECT: PUBLIC CONSULTATION ON TRANSALLOYS SOLAR PV ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE WITH A CAPACITY OF UP TO 55MW WITHIN EMALAHLENI LOCAL MUNICIPALITY\_**  
**REFERENCE: 1/3/1/16/1N-356**

The Interim Comment from SAHRA with respect to the subject above has been received on 10<sup>th</sup> of May 2023 by Savannah Environmental (Pty) as appointed EAPs to Transalloys (Pty) Ltd. Hereby I would like to formally inform you about background of captive energy generation activities at Transalloys smelter, as well as the public consultation process that has been conducted as part of the EIA process for the proposed development of 55 MW Transalloys Solar PV Energy Facility and associated infrastructure.

In March 2016 Integrated Environmental Authorisation ("IEA") was granted to Transalloys for development of the captive 55MW coal-fired power station at two project sites located in a close proximity to the smelter and owned by Transalloys. A thorough full scope heritage impact assessment was undertaken in July 2014 within the Environmental impact assessment process for that proposed coal-fired power station. Application for amendment of 2016 IEA was submitted in 2019 because of Transalloys' decision to increase coal-fired power station capacity to 135 MW. Amendment of the IEA was granted to Transalloys by DFFE in August 2021. Before it, an update of 2014 heritage impact assessment was conducted in Q2 2019 for submission within the documents package for amendment of 2016 IEA. The same project sites are proposed currently for development of 55MW Transalloys Solar PV Energy Facility and associated infrastructure.

Given a number of previous extensive and thorough heritage impact assessments undertaken for currently proposed project sites and in line with statutory requirements for the basic assessment process, only a desktop assessment was conducted at this stage for 55MW Transalloys Solar PV Energy Facility. The team of experts meticulously reviewed results of previous studies conducted, considering both tangible and intangible cultural heritage. The new assessment confirmed that the proposed development will have no negative impact on any cultural sites of high heritage significance. Free access is currently available to these heritage sites, such as initiation sites and burial grounds, and it



will not be affected by proposed development because all those sites located outside of the development area.

The primary objective of the public consultation process conducted for 55MW Transalloys Solar PV Energy Facility and associated infrastructure was to foster transparency and open communication between the project team and the local community. As an important part of it, we have diligently engaged with community leaders and stakeholders to ensure that cultural sites of significance will not be impacted by the proposed development. We recognized the importance of considering the concerns and feedback from community leaders and individuals who hold deep-rooted knowledge and attachment to the cultural heritage of the area.

A focus group meeting has already been held with community leaders on April 18, 2023, addressing concerns about initiation sites and burial grounds. The community leaders were assured that the proposed development would not impact these sites. Throughout the consultation process, we have taken extensive measures to engage community leaders, conducting meetings and presentations to provide a platform for open dialogue. These interactions have allowed us to address all concerns regarding the proposed development and to establish a mutual understanding of the importance of preserving cultural sites.

We would like to assure SAHRA that we remain committed to upholding the cultural heritage of the area. We understand the need to protect and preserve cultural sites for future generations and will continue to adhere to all relevant heritage preservation guidelines and regulations.

Enclosed with this letter, you will find detailed documentation of the public consultation process, including minutes of meetings and reports summarizing the impact assessment findings. Given a number of previous extensive and thorough Heritage Impact Assessments undertaken for currently proposed project sites, we kindly request SAHRA to review provided documents and acknowledge our efforts to engage the community and to mitigate any potential impact on cultural sites.

We remain available to provide any further information or clarification to the subject above as required. Your positive decision on granting Transalloys with the consent for further development of Transalloys Solar PV Energy Facility project will be highly appreciated!

Yours sincerely,



Andrey Korzh  
Project Director