



an agency of the  
Department of Arts and Culture

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Case ID: 25600

Date: Wednesday, 23 July, 2025

## **Interim Comment**

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

Anton Pelser  
APelser Archaeological Consulting  
64 Cedar Street  
Lynnwood Ridge  
Pretoria  
0040

Gudani Consulting has appointed by Kinetic Development Group Limited (KDG) to undertake a scoping report for the proposed Kinetic Development Group Limited (KDG) ferroalloys/ferrochrome smelter plant (125Ktpa – 1Mtpa) on the farms Van Der Bijl 528 MS and Dreyer 526 MS (Zone/Stand 12 and 31) within the Musina-Makhado Local Municipalities in Limpopo Province.

The proposed ferroalloys/ferrochrome smelter plant will be within the existing and approved Musina-Makhado Special Economic Zone (MMSEZ).

A Final Scoping Report (FSR) was submitted in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and the NEMA EIA Regulations (As amended). Kinetic Development Group Limited (KDG) intends to develop and establish a ferrochrome and ferroalloys smelter plant within the approved MMSEZ area. The scale of the project is planned to the annual output of 125 000 to 1 000 000 tons, and 2 x 33,000 kVA electric furnaces and their supporting facilities are built. The design shall include general, electric furnace smelting system, raw material system, pellet and roasting process, general transportation, power supply and distribution and electrical facilities (including 132kV transformer station), water supply and drainage system (water, turbidity circulating water system), including ventilation, dust removal, thermal and gas facilities, computer, telecommunications, mechanical repair, inspection, construction, structure, energy analysis and evaluation, environmental protection, occupational safety and health and fire protection, labour and training, project investment estimates, technical economy and evaluation.

APelser Archaeological Consulting has been appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).



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Pelser, A.J. 2025. Phase 1 HIA & Report for the proposed Kinetic Development Group Limited (KDG) ferroalloys/ferrochrome smelter plant on the farms Van Der Bijl 528 MS and Dreyer 526 MS within the Musina-Makhado Local Municipalities of the Limpopo Province.

The study note that during the 2021 Phase 1 HIA in the larger MMSEZ area by Vhufahashu Consultants a total of 30 sites were recorded. These sites range between the Stone Age to historical and contemporary built structures, as well as burial grounds. Burial grounds were predominant (13), and these comprised of 19 graves, followed by historical and contemporary built structures (16) which included hunting camps (7), farmhouses and labourer camps (5), boreholes (2), a windmill (1), and a livestock drinking trough. The Stone Age was represented by an isolated single flake tool.

Over and above the already recorded sites, the May 2025 field-based assessment did not identify any additional sites, features or material of cultural heritage.

#### 2021 Mitigation measures

- Option 1: The graves must be preserved and in situ. This will entail demarcating the site with a proper boundary fence and providing an entrance gate for potential visitors (descendants/family members of the deceased). The site would also have to be clearly sign-posted as a Grave Site and will have to be cleaned and each grave marked, numbered and included in a Graves Register. A Graves Management Plan will have to be drafted and implemented as part of the Development. A 30m buffer zone (from the outside boundary fence of the site) will also have to be adhered to, with no development allowed in this exclusion zone.
- Option 2: Grave exhumation and relocation from the site must be undertaken. This entails proper consultation and applying for a permit from the relevant authority.
- Site 24 is an existing/operating hunting-camp (Vhufahashu Consultants 2021:28). The site and structures associated with it is not of historical heritage origin or significance (not older than 60 years of age) and no mitigation would be required from a cultural heritage point of view.

#### Interim Comment

The SAHRA Development Applications Unit (DAU) is making the following comments in terms of section 38(8) of the National Heritage Resources Act as contemplated by the EIA process in terms of section 24(4)b(iii) of NEMA:

**Phase 1 HIA & Report for the proposed Kinetic Development Group Limited (KDG) ferroalloys/ferrochrome smelter plant**



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- The SAHRA DAU is requesting the applicant to upload the 2021 HIA
- A DEIA is required for further consideration of the proposed development.
- Further comments will be issued upon submission of these further requirements.

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

Yours faithfully

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Nokusho Ngobeni

South African Heritage Resources Agency

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Natasha Higgitt  
Manager: Development Applications Unit  
South African Heritage Resources Agency

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**ADMIN:**



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