

---

**REFERENCE:** 16/3/3/1/A1/2/3048/21  
**NEAS REFERENCE:** WCP/EIA/0000979/2021  
**DATE:** 15 March 2022

The Board of Directors  
Gayatri Paper Mills (Gauteng) (Pty) Ltd.  
P. O. Box 1661  
**DASSENBERG**  
7350

**Attention: Mr. Praveen Felix**

Cell.: 072 302 8455  
E-mail: [praveen@gayatripaper.co.za](mailto:praveen@gayatripaper.co.za)

Dear Sir

**APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED CLEARANCE OF INDIGENOUS VEGETATION FOR THE ESTABLISHMENT OF A NEW FACTORY FOR THE MANUFACTURING OF CORRUGATED BOARD FROM VIRGIN MATERIALS ON ERF 239, ATLANTIS.**

1. With reference to the above application, this Department hereby notifies you of its decision to **grant** Environmental Authorisation, attached herewith, together with the reasons for the decision.
2. In terms of Regulation 4 of the Environmental Impact Assessment Regulations, 2014 (as amended), you are instructed to ensure, within 14 days of the date of the Environmental Authorisation, that all registered interested and affected parties ("I&APs") are provided with access to and reasons for the decision, and that all registered I&APs are notified of their right to appeal.
3. Your attention is drawn to Chapter 2 of the Appeal Regulations, 2014 (as amended), which prescribes the appeal procedure to be followed. This procedure is summarised in the attached Environmental Authorisation.

Yours faithfully

---

**MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

Copied to: (1) Ms. Natasha Williams (Nancy Oosthuizen Consulting)  
(2) Ms. Nancy Oosthuizen (Nancy Oosthuizen Consulting)  
(3) Mr. Morne Theron (City of Cape Town)  
(4) Mr. Clifford Dorse (City of Cape Town)

E-mail: [tashwill@vodamail.co.za](mailto:tashwill@vodamail.co.za)  
E-mail: [nancy@nanco.co.za](mailto:nancy@nanco.co.za)  
E-mail: [morne.theron@capetown.gov.za](mailto:morne.theron@capetown.gov.za)  
E-mail: [clifford.dorse@capetown.gov.za](mailto:clifford.dorse@capetown.gov.za)

---

## ENVIRONMENTAL AUTHORISATION

### APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014, AS AMENDED: PROPOSED CLEARANCE OF INDIGENOUS VEGETATION FOR THE ESTABLISHMENT OF A NEW FACTORY FOR THE MANUFACTURING OF CORRUGATED BOARD FROM VIRGIN MATERIALS ON ERF 239, ATLANTIS.

With reference to your application for the abovementioned, find below the outcome with respect to this application.

#### DECISION

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended), the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the listed activities specified in section B below with respect to the Site alternative, described in the Final Basic Assessment Report ("BAR"), dated January 2022.

The applicant for this Environmental Authorisation is required to comply with the conditions set out in section E below.

#### A. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

Gayatri Paper Mills (Gauteng) (Pty) Ltd.  
c/o Mr. Praveen Felix  
P. O. Box 1661  
DASSENBERG  
7350

Cell.: 072 302 8455  
E-mail: [praveen@gayatripaper.co.za](mailto:praveen@gayatripaper.co.za)

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

## B. LIST OF ACTIVITIES AUTHORISED

Listed Activity	Activity/Project Description
<p>Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 27 Activity Description: <i>“The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—</i> <i>(i) the undertaking of a linear activity; or</i> <i>(ii) maintenance purposes undertaken in accordance with a maintenance management plan”.</i></p>	<p>More than 1 hectare of indigenous vegetation will be cleared as part of the proposed development.</p>
<p>Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 12 Activity Description: <i>“The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</i></p> <ul style="list-style-type: none"> <li>i. Western Cape</li> <li>i. <i>Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;</i></li> <li>ii. <i>Within critical biodiversity areas identified in bioregional plans;</i></li> <li>iii. <i>Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;</i></li> <li>iv. <i>On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or</i></li> <li>v. <i>On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister”.</i></li> </ul>	<p>More than 300 square metres of critically endangered indigenous vegetation (Atlantis Sand Fynbos) will be cleared as part of the proposed development.</p>

The abovementioned list is hereinafter referred to as "the listed activities".

The holder is herein authorised to undertake the following alternative related to the listed activities:

The proposed activities will entail the clearance of indigenous vegetation for the establishment of a corrugated board manufacturing plant and associated infrastructure on Erf 239, Atlantis. The loss of indigenous vegetation will be compensated for by the Atlantis Industrial Incentives Scheme, which is a mechanism used to mitigate biodiversity loss and to facilitate development within the urban and industrial areas of Atlantis. This is achieved by an offsite biodiversity offset through the land banking component of the afore-mentioned scheme.

The development of a corrugated board manufacturing plant comprises:

- an enclosed factory building;
- site entrance with security building;
- security fencing;
- internal access roads;
- parking and paved areas;
- loading bays (ramps);
- waste container placement area;
- three (3) JoJo tanks;
- ablution facilities;
- two (2) fire water tanks;
- coal-fired boiler with a heat input of approximately 6.58 Mega Watt ("MW") and burning efficiency as well as filter technologies;
- a coal storage facility;
- associated service infrastructure;
- landscaping areas; and
- associated stormwater infrastructure.

The total development footprint amounts to approximately 26 974m<sup>2</sup>.

Access to the site will be gained off De Korte Street, Atlantis.

### C. SITE DESCRIPTION AND LOCATION

The listed activities will be undertaken on Erf 239, Atlantis, which is located at 14 Charel Uys Drive, Atlantis Industrial, Atlantis, Cape Town.

The SG digit code is: C01600870000023900000

The co-ordinates are:

33° 35' 22.32South;

18° 28' 43.89" East

Refer to Annexure 1: Locality Plan.

Refer to Annexure 2: Layout Plan.

The above-mentioned properties are hereinafter referred to as "**the site**".

### D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

Nancy Oosthuizen Consulting  
c/o Ms. Natasha Williams  
P. O. 139  
GILLITTS  
3603

Cell.: 082 493 3059

E-mail: [tashwill@vodamail.co.za](mailto:tashwill@vodamail.co.za)

## **E. CONDITIONS OF AUTHORISATION**

### **Scope of authorisation**

1. The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the site alternative described in the Final BAR, dated January 2022 on the site as described in Section C above.
2. Authorisation of the activities are subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.
3. The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.

This Environmental Authorisation is granted for–

- (a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities.
  - (b) A period of ten (10) years, from the date the holder commenced with the authorised listed activities, during which period the authorised listed activities, must be concluded.
4. The activities that have been authorised may only be carried out at the site described in Section C above in terms of the approved "Environmental Management Programme" ("EMPr").
  5. Any changes to, or deviations from the scope of the description set out in Section B and Condition 2 above must be accepted or approved in writing by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request such information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

### **Notification of authorisation and right to appeal**

6. The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of this decision –
  - 6.1 notify all registered Interested and Affected Parties ("I&APs") of –
    - 6.1.1 the outcome of the application;
    - 6.1.2 the reasons for the decision;
    - 6.1.3 the date of the decision; and
    - 6.1.4 the date of issue of the decision;
  - 6.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended);
  - 6.3 draw the attention of all registered I&APs to the manner in which they may access the decision; and
  - 6.4 provide the registered I&APs with:
    - 6.4.1 the name of the holder (entity) of this Environmental Authorisation;
    - 6.4.2 name of the responsible person for this Environmental Authorisation;
    - 6.4.3 postal address of the holder;
    - 6.4.4 telephonic and fax details of the holder;
    - 6.4.5 e-mail address, if any; and
    - 6.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event

that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).

### **Commencement**

7. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision.
8. In the event that an appeal is lodged with the Appeal Administrator, the effect of this Environmental Authorisation is suspended until such time as the appeal is decided. In the instance where an appeal is lodged the holder may not commence with the activities, including site preparation, until such time as the appeal has been finalised and the holder is authorised to do so.

### **Written notice to the competent authority**

9. A minimum of seven calendar days' notice, in writing, must be given to the competent authority before commencement of construction activities. Commencement for the purpose of this condition includes site preparation.
  - 9.1 The notice must make clear reference to the site details and EIA Reference number given above.
  - 9.2 The notice must also include proof of compliance with the following conditions described herein:  
Conditions: 6, 7, 14, 18.1 and 19.

### **Management of activity**

10. The EMPr submitted, as dated January 2022 is hereby approved and must be implemented.
11. An application for amendment of the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended), if any amendments are to be made to the outcomes of the EMPr and these may only be implemented once the amended EMPr has been authorised by the competent authority.
12. The EMPr must be included in all contract documentation for all phases of implementation.
13. A copy of the Environmental Authorisation EMPr must be kept at the site where the listed activities will be undertaken. Access to the site referred to in Section C above must be granted and the Environmental Authorisation and EMPr must be produced to any authorised official representing the competent authority who requests to see these for the purposes of assessing and/or monitoring compliance with the conditions contained herein. The Environmental Authorisation and EMPr must also be made available for inspection by any employee or agent of the applicant who works performs work at the site.

### **Monitoring**

14. The holder must appoint a suitably experienced Environment Control Officer ("ECO"), for the duration of the construction phase and site rehabilitation phases of implementation.

The ECO must–

- 14.1 be appointed prior to commencement of any land clearing or construction activities commencing;
- 14.2 ensure compliance with the EMPr and the conditions contained herein; and
- 14.3 keep record of all activities on site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO.

## **Environmental audit reports**

15. The holder must, for the period during which the Environmental Authorisation and EMPr remain valid –
  - 15.1 ensure that compliance with the conditions of the Environmental Authorisation and the EMPr is audited;
  - 15.2 submit at least two environmental audit reports to the relevant competent authority during the construction phase. The holder must submit one audit report three (3) months after commencement of the construction phase and another audit report six (6) months after completion of the construction phase; and
  - 15.3 submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.
16. The environmental audit report must be prepared by an independent person and must address the objectives and contain all the information set out in Appendix 7 of the EIA Regulations, 2014 (as amended).

In addition to the above, the environmental audit report, must –

  - 16.1 provide verifiable findings, in a structured and systematic manner, on–
    - (a) the level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and
    - (b) the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;
  - 16.2 identify and assess any new impacts and risks as a result of undertaking the activities;
  - 16.3 evaluate the effectiveness of the EMPr;
  - 16.4 identify shortcomings in the EMPr;
  - 16.5 identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
  - 16.6 indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;
  - 16.7 include a photographic record of the site applicable to the audit; and
  - 16.8 be informed by the ECO reports.
17. The holder must, within 7 days of the submission of the environmental audit report to the competent authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and, where the holder has such a facility, place on a publicly accessible website.

## **Specific conditions**

18. The following measures recommended in Final BAR dated January 2022, as included in the EMPr, must be implemented:
  - 18.1 A search and rescue operation of all translocatable indigenous species located on the site must be conducted prior to the commencement of construction together with the City of Cape Town: Biodiversity Management Branch. The searched and rescued species must be re-used and/or replanted, as agreed to by the City of Cape Town: Biodiversity Management Branch.
  - 18.2 The total area to be cleared must be deducted from the land banking component of the Atlantis Industrial Incentives Scheme.
19. A stormwater management plan must be approved by the City of Cape Town. A copy of the letter of approval and the approved stormwater management plan must be submitted to this Department prior to commencement.
20. An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed.

Any solid waste must be disposed of at a waste disposal facility licensed in terms of the applicable legislation.

21. Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings and graves or unmarked human burials.

A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.

## **F. RECOMMENDATION**

This Directorate recommends the following:

1. Employment opportunities should as far as possible be provided to the local Atlantis community.

## **G. GENERAL MATTERS**

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.
2. Non-compliance with a condition of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.
3. If the holder does not commence with the listed activities within the period referred to in Condition 2, this Environmental Authorisation shall lapse for the listed activities, and a new application for Environmental Authorisation must be submitted to the Competent Authority. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be made to the Competent Authority prior to the expiry date of the Environmental Authorisation.
4. The holder must submit an application for amendment of the Environmental Authorisation to the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the NEMA EIA Regulations, 2014 (as amended) must be submitted.

Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the Competent Authority must only be notified of such changes.

5. The manner and frequency for updating the EMPr is as follows:

Amendments to the EMPr must be done in accordance with Regulations 35 to 37 of the NEMA EIA Regulations, 2014 (as amended) or any relevant legislation that may be applicable at the time.



## G. APPEALS

Appeals must comply with the provisions contained in the National Appeal Regulations, 2014 (as amended).

1. An appellant (if the holder of the decision) must, within 20 (twenty) calendar days from the date notification of the decision was sent to the holder by the competent authority -
  - 1.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and
  - 1.2 Submit a copy of the appeal to any registered I&APs, any Organ of State with interest in the matter and the decision-maker *i.e.*, the competent authority that issued the decision.
2. An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date the holder of the decision sent notification of the decision to the registered I&APs -
  - 2.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and
  - 2.2 Submit a copy of the appeal to the holder of the decision, any registered Interested and Affected Party, any Organ of State with interest in the matter and the decision-maker *i.e.*, the competent authority that issued the decision.
3. The holder of the decision (if not the appellant), the decision-maker that issued the decision, the registered Interested and Affected Party and the Organ of State must submit their responding statements, if any, to the appeal authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.
4. The appeal and the responding statement must be submitted to the address listed below:

By post:                   Attention: Marius Venter  
Western Cape Ministry of Local Government, Environmental Affairs and  
Development Planning  
Private Bag X9186  
CAPE TOWN  
8000

By facsimile:       (021) 483 4174; or

By hand:               Attention: Mr Marius Venter (Tel: 021 483 3721)  
Room 809  
8th Floor Utilitas Building, 1 Dorp Street, Cape Town, 8001

Note: For purposes of electronic database management, you are requested to submit electronic copies (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Authority to the address listed above and/ or via e-mail to [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za).

5. A prescribed appeal form as well as assistance regarding the appeal processes is obtainable from the Appeal Authority at: Tel. (021) 483 3721, E-mail [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za) or URL <http://www.westerncape.gov.za/eadp>.

## H. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is appreciated.

Yours faithfully

**MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

**DATE OF DECISION: 15 MARCH 2022**

Copied to: (1) Ms. Natasha Williams (Nancy Oosthuizen Consulting)  
(2) Ms. Nancy Oosthuizen (Nancy Oosthuizen Consulting)  
(3) Mr. Morne Theron (City of Cape Town)  
(4) Mr. Clifford Dorse (City of Cape Town)

E-mail: [tashwill@vodamail.co.za](mailto:tashwill@vodamail.co.za)  
E-mail: [nancy@nanco.co.za](mailto:nancy@nanco.co.za)  
E-mail: [morne.theron@capetown.gov.za](mailto:morne.theron@capetown.gov.za)  
E-mail: [clifford.dorse@capetown.gov.za](mailto:clifford.dorse@capetown.gov.za)

### **FOR OFFICIAL USE ONLY:**

**REFERENCE: 16/3/3/1/A1/2/3048/21**  
**NEAS REFERENCE: WCP/EIA/0000979/2021**

## ANNEXURE 1: LOCALITY MAP





## ANNEXURE 3: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, *inter alia*, the following:

- a) The information contained in the Application Form dated 21 September 2021, the Final BAR dated January 2022, the EMPr as dated January 2022 and the additional information received on 24 January 2022, 3 March 2022 and 10 March 2022;
- b) Relevant information contained in the Departmental information base, including the Guidelines on Public Participation, Alternatives (dated March 2013);
- c) The objectives and requirements of relevant legislation, policies and guidelines, including Section 2 of the NEMA; and
- d) The comments received from I&APs and responses to these, included in the Final BAR.

All information presented to the Competent Authority was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues that were considered to be the most significant for the decision is set out below.

### 1. Public Participation

The public participation process included:

- potential I&APs were identified and an I&AP database was developed;
- notifications of the basic assessment process and a Background Information Document was distributed via email to all the identified I&APs on 26 October 2021;
- notices were placed in the Cape Times and Die Burger newspapers on 21 October 2021;
- site notice boards were placed on the boundary of the property with Charel Uys Street on 26 October 2021; and
- a draft BAR was distributed to registered I&APs for a 30-day comment period, i.e. 15 November 2021 to 15 December 2021.

During the public participation process, comments were obtained from key authorities which largely related to the required biodiversity offset, general conditions to be adhered to during construction and operational phases and the requirement for a Koeberg Emergency Evacuation Plan. The EAP responded to such comments to confirm that all relevant requirements will be adhered to and implemented.

This Department is satisfied that the Public Participation Process that was followed met the minimum legal requirements. All the comments and responses made were included in the Final BAR.

### 2. Alternatives

The preferred site alternative as well as the no-go alternative were assessed.

Site alternative (Preferred by the applicant and herewith authorised)

The preferred site alternative is for the factory for the manufacturing of corrugated board to be developed on Erf 239, Atlantis comprising:

- an enclosed factory building;
- site entrance with security building;
- security fencing;
- internal access roads;
- parking and paved areas;
- loading bays (ramps);
- waste container placement area;
- three (3) JoJo tanks;
- ablution facilities;
- two (2) fire water tanks;
- coal-fired boiler with a heat input of approximately 6.58 Mega Watt ("MW") and burning efficiency as well as filter technologies;
- a coal storage facility;
- associated service infrastructure;
- landscaping areas; and
- associated stormwater infrastructure.

The total development footprint amounts to approximately 26 974 m<sup>2</sup>.

This is the only and preferred site alternative given the site's location in the Atlantis Industrial area. The site is also owned by the applicant and is located adjacent to an existing packaging factory owned by the same group. These two factories will therefore be able to function as compatible industries.

#### Activity alternative (Preferred by the applicant)

The preferred activity alternative entails the manufacture of corrugated board using a coal-fired boiler for steam generation.

This is the only and preferred activity alternative as the specialised manufacturing operations are known to the project applicant and will be compatible with the operations of the adjacent site's operations which manufactures packaging.

#### Layout alternative (Preferred by the applicant)

The preferred layout alternative entails the layout and design of the factory to be based on the specific operational characteristics of the site manufacturing activities. This specifically relates to the following aspects:

- the spatial layout required to accommodate the full length of the corrugator plant;
- facility vehicle movement and their interaction with traffic flow;
- natural topography of the site to facilitate gravity flow of runoff for effective stormwater management; and
- current location of municipal service connections.

This is the preferred layout alternative as the layout accommodates the abovementioned aspects and optimises the requirements of the manufacturing operational requirements.

#### Technology alternatives

The following alternatives for the type of boiler to be used for the steam requirements of the corrugated board plant were considered:

- coal-fired boiler;
- HFO (Heavy Fuel Oil) boiler;
- natural gas boiler;
- electric boilers; and
- generation of steam from solar.

Based on the reliability of steam supply, the comparative small scale heating requirements of the required boiler combined with economical sustainability considerations, the 6.58 MW net heat input coal-fired boiler was selected as the most suitable and therefore preferred alternative. Furthermore, the coal-fired boiler will be more cost-effective, sustainable and result in less negative impacts (in terms of emissions generated) when compared with other options.

#### No-go alternative (rejected by the applicant):

The no-go alternative entails maintaining the *status quo*, i.e. no construction and operation of the corrugated board manufacturing plant. The no-go alternative was rejected based on the following reasons:

- the proposed site is strategically located in the middle of the Atlantis industrial area which has been designated a Special Economic Zone ("SEZ"); and
- the potential capital investment will not be realised.

### **3. Impact Assessment and Mitigation measures**

#### 3.1 Activity need and desirability

The economically active population (i.e., labour force) of Atlantis comprises approximately 60% of the population. Approximately 26% of the Atlantis residents are unemployed. Of the economically active residents of Atlantis, approximately 12% commute to jobs outside of the Atlantis region. Business and economic opportunities in the Atlantis area will therefore contribute to upliftment of the local community. The proposed development in this regard is set to bring much needed employment and economic activity to the local area of Atlantis.

The proposed development will be located in the Atlantis SEZ and is consistent with this Zone's objectives of promoting investment in the area, create employment opportunities and contribute to reducing poverty in the Atlantis Region, given the nature of the proposed development.

### 3.2 Regional/Planning Context

The site is zoned General Industrial I and the proposed development is a permitted landuse.

The broad-based principles relating to protecting the environment while also promoting economic development and opportunities will be met as per the City of Cape Town Integrated Development Plan, and The Blaauwberg District Plan (2012). This is contributed the development site being located in the SEZ while measures such as search and rescue operations and a biodiversity offset will further help to achieve the goal relating to protection and sustainable management of the environment.

### 3.3 Botanical Impacts

A Terrestrial and Aquatic Compliance Statement dated October 2021 was undertaken by the Biodiversity Company. The site is a greenfield site situated within an industrial development node. Anthropogenic activities such as earth moving and dumping of waste have however modified the natural habitat of the site, while alien vegetation have been aggressively invading the site. The site was therefore deemed to have a moderate/medium biodiversity sensitivity according to the Terrestrial Biodiversity Compliance Statement dated October 2021.

The remaining on-site natural habitat includes remnants of Atlantis Sand Fynbos located in isolated pockets on the site. Approximately 26 700 m<sup>2</sup> of mixed alien and indigenous vegetation, including Atlantis Sand Fynbos vegetation will be cleared. The associated impact will be of low negative significance after mitigation. In this regard, the site is located in an area defined as 'Other Natural Vegetation' in terms of the City of Cape Town Biodiversity network mapping, where certain development may occur, but a biodiversity offset is required. The loss of indigenous vegetation will be compensated for by the Atlantis Industrial Incentives Scheme, which is a mechanism used to mitigate biodiversity loss and to facilitate development within the urban and industrial areas of Atlantis. This is achieved by an offsite biodiversity offset through the land banking component of the afore-mentioned scheme. A biodiversity offset will be implemented, as confirmed in the City of Cape Town's correspondence dated 24 January 2022. The biodiversity offset as well as the search and rescue operation will help to compensate for the Atlantis Sand Fynbos that will be cleared as a result of the proposed development.

Cape Nature indicated in a comment dated 14 December 2021, that considering the botanical, faunal and aquatic sensitivities have been adequately mitigated, they do not object to the proposed development. Further, the recommendation to utilise the Atlantis Industrial Incentives Scheme is supported.

### 3.4 Aquatic related Impacts

In order to avoid having any negative impacts on the underlying Atlantis Primary Aquifer System (e.g., pollution and contamination), certain manufacturing operations must be adhered to, as included in the approved EMPr. These include *inter alia*, the use of drip trays where necessary, mixing/decanting of all chemicals and hazardous substances to take place on a tray or on an impermeable surface and implementing spill management as well as containment measures. The impacts on groundwater sources will therefore be of low negative significance.

According to the Aquatic Biodiversity Compliance Statement dated October 2021 no aquatic biodiversity nor surface water was found to be present on-site. It is further confirmed in the Site Sensitivity Verification Report dated January 2022 that there is no evidence of aquatic environments on or within 500m of the site.

### 3.5 Fauna

According to the Biodiversity Assessment dated October 2021, any likelihood of fauna being present on-site could be contributed to the presence of burrows. Measures must therefore be implemented in order to avoid and mitigate any potential negative impacts on any faunal species, as included in the approved EMPr.

### 3.6 Visual/Sense of place

The facility will be in keeping with the existing industrial landuse in the immediate area. The visual impacts will therefore be of low negative significance.

### 3.7 Heritage

A Heritage Sensitivity Screening Assessment dated September 2021 was compiled by CTS Heritage. According to the Heritage Sensitivity Screening Assessment, no on-site sensitive heritage, archaeological or palaeontological heritage resources were identified. The heritage related impacts will be of low negative significance after mitigation. Heritage Western Cape indicated in its correspondence dated 29 September 2021 that the proposed development will not impact on any heritage resources.

### 3.8 Services

The site has access to existing services and road access. However, since the site is located within 16km of the Koeberg Emergency Planning Zone, proof of the submission of the required Traffic Evacuation Model forms was confirmed in the email correspondence dated 14 December 2021 from of the City of Cape Town.

Water is required to generate steam in the boiler and for the mixing of the bonding glue. The estimated water usage of 13 - 20 kilolitres per day will be supplied by the City of Cape Town.

The facility will require 952 kilovolt amperes ("kVA") with a total load of 1360 amperes, which is to be supplied by the City of Cape Town. It is confirmed in the correspondence from the City of Cape Town dated 2 March 2022 that sufficient capacity exists to supply the required electricity.

Various forms of waste will be generated during the operational phase. These include *inter alia* waste from trimmed and corrugated board defects, used starch, caustic soda and borax bags, general office waste, waste from oily rags and used oil. These forms of waste will either be recycled in the appropriate manner, sent to a licenced landfill for disposal (including those licenced to accept hazardous waste) and/or reused.

Effluent that has elevated levels of sodium, boron and suspended solids that will be captured and pumped via overhead steel pipes to one of three (3) JoJo tanks to be located outside of the factory building. The captured effluent will be removed from site for treatment and disposal by an accredited waste contractor.

The general waste will be disposed of at a licenced landfill. It is confirmed in the correspondence from the City of Cape Town dated 2 March 2022 that sufficient capacity exists to accept, collect and dispose of all types of waste at a designated licence landfill site.

Both the domestic sewage and blow down water generated by the coal-fired boiler will be discharged to the existing municipal sewer pipeline and system.

Stormwater of which includes a stormwater catch pits and a formalised system will be managed in accordance with a municipally approved stormwater management plan.

It is confirmed in the correspondence from the City of Cape Town dated 15 December 2021 and 28 February 2022 that the municipality's bulk supply system has sufficient water resource, treatment, bulk storage and conveyance capacity.

### 3.9 Traffic

It is estimated that approximately 20 truck trips per day to the facility and 10 passenger vehicles will be generated during the operational phase of the proposed development. The associated traffic related impacts will be of low negative significance after mitigation. In this regard the traffic impacts during the construction phase will be managed in accordance with the provisions of the EMPr while access to the site is proposed off the less busy De Korte Street. This will negate the need to access the site directly off of Charel Uys Drive while turning across traffic.

### 3.10 Nuisance

The noise during the construction will be managed in accordance with the relevant provisions of the EMPr. Noise during the operational phase will be mitigated by the fact that operations will take place in enclosed buildings. Existing residential areas are located approximately 1.6 km to



the north east and 2 km to the east of the site. Noise generated by the corrugator plant will be buffered by the factory building. In addition, noise levels are reduced with increased distance from source and it is predicted that any noise generated at Erf 239 will not be audible in either of these residential areas. Noise from the facility will therefore not be audible in these residential areas. The noise impacts will therefore be of low negative significance after mitigation.

No odours are expected to be generated given the nature of the facility which entails corrugator board processing.

### 3.11 Emissions

Emissions will be generated by the coal-fired boiler. The boiler will be equipped with burning efficiency and filter technologies to ensure efficient combustion of the coal and thereby reducing emissions and the levels of particulate matter. The impacts associated with the boiler will therefore be of low negative significance after mitigation. The coal-fired boiler does not require an atmospheric emission licence (AEL) as the threshold comply with the minimum emissions standards set by the City of Cape Town Air Quality Management Bylaw, 2016.

### 3.12 Socio-economic

The proposed development will result in the provision of employment opportunities during both the construction and operational phases.

The development will result in both negative and positive impacts.

#### **Negative Impacts:**

- Loss of indigenous vegetation; and
- Emissions from coal-fired boiler.

#### **Positive impacts:**

- Provision of employment opportunities during construction and the operational phases; and
- Investment in the Atlantis Industrial area, which will contribute to the local economy.

## **4. National Environmental Management Act Principles**

The National Environmental Management Principles (set out in section 2 of the NEMA, which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures; and
- the selection of the best practicable environmental option.

## 5. Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMP, the Competent Authority is satisfied that the proposed listed activities will not conflict with the general objectives of integrated environmental management stipulated in Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and that any potentially detrimental environmental impacts resulting from the listed activities can be mitigated to acceptable levels.

You are reminded of your general duty of care towards the environment in terms of Section 28(1) of the NEMA which states: *“Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”*

-----END-----