



EIA REFERENCE NUMBER: 16/3/3/2/A3/57/2009/21
NEAS REFERENCE NUMBER: WCP/EIA/0000927/2021
ENQUIRIES: Mr. R. Chambeau
DATE OF ISSUE: 17 January 2022

The Director
Leswiti Trading 20 (Pty) Ltd. trading as Flaura Pets
P.O. Box 1723
SOMERSET WEST
7129

For Attention: Mr. N. Ferguson

Tel: (021) 851 8331

Email: info@flaurapets.co.za

Dear Sir

APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED): THE PROPOSED DEVELOPMENT OF A PET CREMATORIUM ON ERF 22379, STRAND.

1. With reference to the above application, this Department hereby notifies you of its decision to **grant** Environmental Authorisation, 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 decision on the application, that all registered interested and affected parties ("I&APs") are provided with access to the decision 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 National Appeal Regulations, 2014 (as amended), which prescribes the appeal procedure to be followed. This procedure is summarised hereunder.

Yours faithfully

MR ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT

Copies to: (1) Ms. I. Eggert (In Clover Environmental Consultants (Pty) Ltd)
(2) Ms. A. van Wyk (City of Cape Town: ERM)
(3) Mr. I. Gildenhuys (City of Cape Town: Air Quality)
(4) Mr. P. Harmse (DEA&DP: Air Quality)
(5) Mr. L. McBain-Charles (DEA&DP: Waste Management)

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ENVIRONMENTAL AUTHORISATION

APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED): THE PROPOSED DEVELOPMENT OF A PET CREMATORIUM ON ERF 22379, STRAND.

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 activity specified in section B below with respect to Preferred Alternative, described in the Environmental Impact Assessment Report ("EIA") dated September 2021.

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

A. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

The Director
Leswiti Trading 20 (Pty) Ltd. trading as Flaura Pets
c/o Mr. N. Ferguson
P.O. Box 1723
SOMERSET WEST
7129

Tel: (022) 851 8331
Email: info@flaurapets.co.za

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

B. ACTIVITY AUTHORISED

Listed Activity	Activity/Project Description
Listing Notice 2 of the EIA Regulations, 2014, (as amended): Activity Number: 6 Activity Description:	

<p><i>“The development of facilities or infrastructure for any process or activity which requires a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent, excluding—</i></p> <ul style="list-style-type: none"> <i>(i) activities which are identified and included in Listing Notice 1 of 2014;</i> <i>(ii) activities which are included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies;</i> <i>(iii) the development of facilities or infrastructure for the treatment of effluent, polluted water, wastewater or sewage where such facilities have a daily throughput capacity of 2 000 cubic metres or less; or</i> <i>(iv) where the development is directly related to aquaculture facilities or infrastructure where the wastewater discharge capacity will not exceed 50 cubic metres per day.</i> 	<p>For the proposed development of the pet crematorium on Erf 22379, Strand, the holder will be required to obtain an Atmospheric Emissions Licence.</p>
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The abovementioned list is hereinafter referred to as “the listed activity”.

The holder is herein authorised to undertake the following alternative that includes the listed activity relating to the authorised development:

The authorised development will be limited to the installation of the cremator unit as well as the related fuel storage facilities and emission stack. Operation would entail receipt, temporary cold storage and cremation of deceased animal remains.

Pet remains are received either via collection from veterinary facilities and private homes or via delivery to the crematorium. Temporary storage of pet remains occur in refrigerated conditions when same day cremation is not possible.

Smaller carcasses will be loaded into the cremator unit via front doors while larger carcasses will be hoisted/loaded through the larger top access of the cremator. A full burn cycle for the maximum capacity of the cremator will take approximately 9 hours. Remains from the cremator comprise of ash and small bone particles. These are ground using a cremulator. Animal remains are transferred to urns or other receptacles before being returned to pet owners (where requested).

The balance of the waste (cremated remains) is taken to Vissershok Landfill for disposal. This amounts to approximately 50 kg month and is temporarily stored within the factory unit in 3 x designated wheelie bins with lids. The CoCT Solid Waste Branch confirmed capacity to dispose of the waste generated by the facility.

The cremation process does not generate effluent sewage. The addition of an on-site crematorium will therefore not increase effluent and sewage currently generated by the facility. Cremation uses no

water in the process. No additional water will therefore be used by the facility when on site cremation is undertaken. All structures and hard stands that generate stormwater runoff is already in place. Hence, no additional stormwater will be generated when compared to the status quo.

The cremator and abatement equipment will require single phase electricity to operate the electronic components (i.e., control units, fans, etc.). Electricity usage will be limited, estimated at 3500 kWh per month. The existing 240v, 16 Amp single phase power supply will be utilized. The CoCT Electrical branch confirmed that this existing supply is sufficient to run the cremator unit. Backup power will be provided by an inverter that is linked to a battery system. This system will provide power for the cold storage units for a minimum of 4 hours. In other words, the backup power will be sufficient to cover a load shedding event.

The burners on the cremator run on fuel. Paraffin was initially proposed as the preferred fuel source. The equipment can accommodate diesel or paraffin with a small change in the nozzles. However, due to the CCT's concern that paraffin could lead to olfactory impacts on the surrounding land users, and closest residential areas, the Applicant opted to use diesel to fuel the burners. The cremator unit will use approximately 14-16 litres of diesel per hour of operation. A maximum of 200 ℓ of diesel will be stored at the facility. The Applicant has already identified a service provider that would top up the tank every 3 days.

The following is pertinent in respect of the fuel storage:

- Fuel will be stored in a 200 ℓ slimline 3mm mild steel tank.
- The tank will be a self-bunded (double walled) vessel and will therefore be fitted with a bund to contain any leaks.
- The tank and installation will meet the requirement of SANS10131.
- The tank will have a vent to the outside wall of the facility and will be fitted with a flame arrestor.

The installation of the cremator unit as well as the related fuel storage facilities and emission stack will occur within the existing facility and no expansion to the developed footprint (measuring approximately 113m² in extent) will occur.

An existing road network will be used to access the site. The facility can be approached via the front (a parking embayment off Fabriek Street) or the rear, from Potgieter Street, through the parking area of "Tradelink Park" development.

C. SITE DESCRIPTION AND LOCATION

The authorised listed activity will be undertaken at an existing factory building on Erf 22379, Strand.

The 21-digit Surveyor General code for the proposed site is:

Erf 22379, Strand	C06700230002237900000
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Site co-ordinates for the proposed site is:

Starting point	34° 05' 55.87" South	19° 50' 32.26" East
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Refer to Annexure 1: Locality Plan and Annexure 2: Site Plan.

The said section of land is hereinafter referred to as "**the site**".

D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

In Clover Environmental Consultants (Ltd)
c/o Ms. Ingrid Eggert
P.O. Box 3420
TYGERVALLEY
7536

Cell.: 083 278 7107
Email: ingrid@inclover.co.za

E. CONDITIONS OF AUTHORISATION

Scope of authorisation

1. The holder is authorised to undertake the listed activity specified in Section B above in accordance with and restricted to the Preferred Alternative described in the EIA report dated September 2021 on the site described in Section C above.
2. 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 for the construction phase, must be concluded.
3. The holder shall be responsible for ensuring 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.
4. Any changes to, or deviations from the scope of the alternatives described in section B above must be 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 information in order 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.

Written notice to the Competent Authority

5. A minimum of 7 (seven) calendar days' notice, in writing must be given to the Competent Authority before commencement of activities.
 - 5.1. The notice must make clear reference to the site details and EIA Reference number given above.
 - 5.2. The notice must also include proof of compliance with the following conditions described herein:

Conditions: 6, 7 and 10.

Notification and administration of appeal

6. The holder 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 as included in Annexure 3;
 - 6.1.3. the date of the decision; and
 - 6.1.4. the date when the decision was issued.
 - 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) detailed in Section G below;
 - 6.3. Draw the attention of all registered I&APs to the manner in which they may access the decision;
 - 6.4. Provide the registered I&APs with:
 - 6.4.1. 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, of the holder,
 - 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).
7. The listed activity, including site preparation, must not be commenced with within 20 (twenty) calendar days from the date the holder notifies the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided, i.e., the listed activities, including site preparation, must not be commenced with until the appeal is decided.

Management of activity

8. The Environmental Management Programme (“EMPr”) (dated September 2021) and submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.
9. The EMPr must be included in all contract documentation for all phases of implementation.

Monitoring

10. The holder must appoint a suitably experienced Environmental Control Officer (“ECO”) before commencing with development activity to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.
11. A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept on the site of the authorised listed activity and must be made available to any authorised person on request.
12. Access to the site referred to in Section C above must be granted and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see these for the purpose of assessing and/or monitoring compliance with the conditions contained herein.

Auditing

13. In terms of Regulation 34 of the EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Reports must be prepared by an independent person with expertise and must contain all the information required in Appendix 7 of the EIA Regulations, 2014 (as amended).
 - 13.1. The holder must undertake an environmental audit within 3 (three) months of the commencement of the listed activity and submit an Environmental Audit Report to the Competent Authority upon completion of the environmental audit.
 - 13.2. A second Environmental Audit Report must be submitted to the Competent Authority within 3 (three) months after the completion of the development/construction activities.
 - 13.3. An Environmental Audit Report must be submitted to the Competent Authority every 5 (five) years after the commencement of the operational phase.
 - 13.4. The holder must, within 7 (seven) 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.

Specific conditions

14. Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.
15. The adjacent neighbours must be notified of the installation activities two weeks prior to the commencement of installation activities.
16. The holder must implement measures that will prevent pollution of surface and/or ground water due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.
17. 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.
18. 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. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activity.
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 activity within the period specified in Condition 2, this Environmental Authorisation shall lapse for that activity, 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. An application for amendment of the Environmental Authorisation must be submitted 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 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 made in accordance with Regulations 35 to 37 of the 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 must –
 - 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 I&AP, 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 I&AP 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 form/s must be submitted by means of one of the following methods:

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

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

H. DISCLAIMER

The Western Cape Government, the holder, 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 greatly appreciated.

Yours faithfully

MR ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

DATE OF DECISION: 17 JANUARY 2022

Copies to: (1) Ms. I. Eggert (In Clover Environmental Consultants (Pty) Ltd)
(2) Ms. A. van Wyk (City of Cape Town: ERM)
(3) Mr. I. Gildenhuys (City of Cape Town: Air Quality)
(4) Mr. P. Harmse (DEA&DP: Air Quality)
(5) Mr. L. McBain-Charles (DEA&DP: Waste Management)

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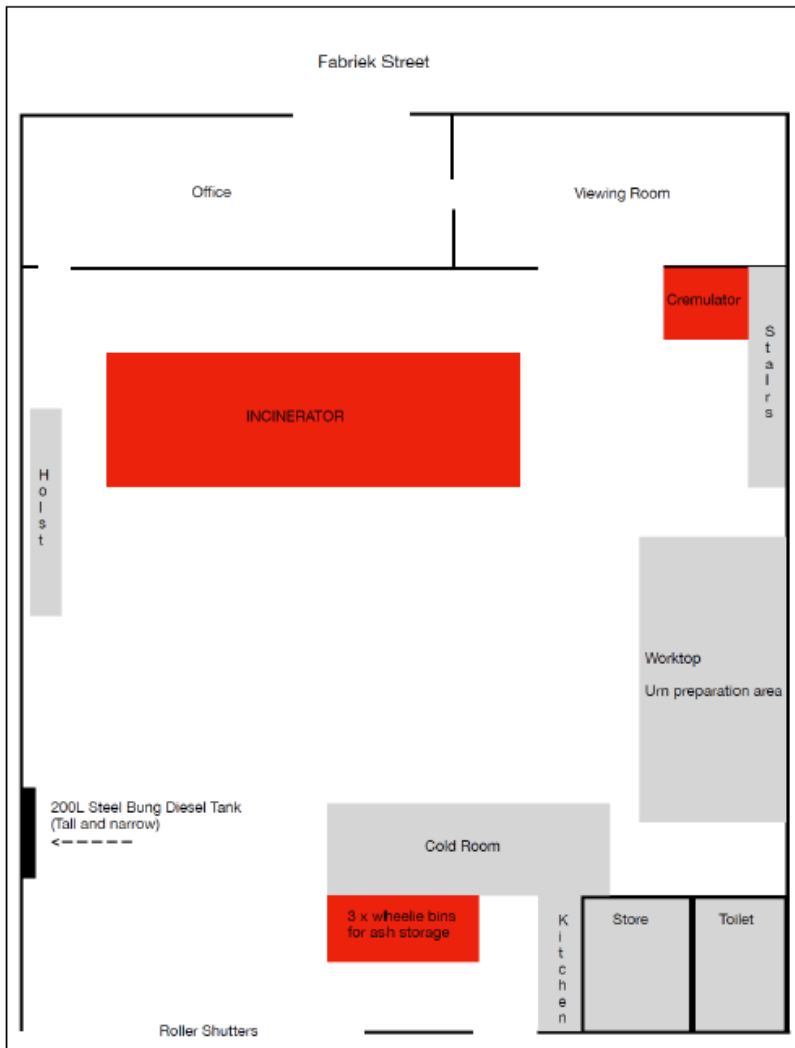
ANNEXURE 1: LOCALITY MAP

The existing facility on Erf 22379, Strand (indicated in the red square).



ANNEXURE 2: SITE PLAN

Site plan for the proposed development.



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 and received by the competent authority on 24 February 2021, the final Scoping Report received by the Competent Authority on 09 April 2021, the draft EIAR received by the Competent Authority on 03 August 2021, the final EIAR dated September 2021 and received by the Competent Authority on 10 September 2021 and the comment from the Department of Water and Sanitation received on 14 September 2021, refer;
- b) Relevant information contained in the Departmental information base, including, the Guidelines on Public Participation, Alternatives and Exemptions (dated March 2013);
- c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA;
- d) The comments received from I&APs and responses to these, included in the EIA report dated September 2021;
- e) The balancing of negative and positive impacts and proposed mitigation measures; and
- f) No site visits were conducted. The competent authority had sufficient information before it to make an informed decision without conducting a site visit.

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 which, according to the competent authority, were the most significant reasons for the decision, is set out below.

1. Public Participation

The public participation process ("PPP") included:

- Identification of and engagement with Interested and Affected Parties ("I&APs");
- A site notice was erected on the site where the listed activity was to be undertaken on 24 February 2021;
- Giving written notice to the owners and occupiers of land adjacent to the site where the listed activities are to be undertaken, the municipality and ward councilor, and the various organs of state having jurisdiction in respect of any aspect of the listed activities on 24 February 2021;
- A 'knock and drop' exercise was undertaken on the 24 February 2021 to distribute the notice to inform owners/occupiers of land adjacent to the site of the proposed project;
- The placing of a newspaper advertisements in the "Bolander" and "Cape Times" on 24 February 2021;
- A draft Scoping Report was released for a 30-day public review period from the 25 February – 29 March 2021;
- A draft EIAR was released for a 30-day comment period from 4 August 2021 – 6 September 2021;

All the concerns raised by I&APs were responded to and adequately addressed during the public participation process. This Department is satisfied that the PPP that was followed met the minimum legal requirements and all the comments raised and responses thereto were included in the comments and responses report. Specific management and mitigation measures have been considered in this Environmental Authorisation and in the EMPr to adequately address the concerns raised.

2. Alternatives

No feasible or reasonable alternatives was considered given that the site in question has the appropriate zoning, is already developed with a factory unit that has space to accommodate the crematorium with related abatement equipment and is already used to provide on-site storage of pet

remains in refrigerated conditions prior to off-site cremation. No site alternatives are therefore available.

Prevention of odour impacts guided the decision to use diesel fuel in lieu of the initially considered use of paraffin. This decision was taken in response to paraffin odour concern raised by the City of Cape Town. Consideration of other fuel types is therefore not reasonable or feasible. No development alternatives are therefore assessed in the EIA Phase as no reasonable or feasible alternatives have been identified.

The preferred alternative and “No-Go” alternative were identified and assessed as follows:

The Preferred Alternative (Alternative 1) – herewith authorised

The authorised development will be limited to the installation of the cremator unit as well as the related fuel storage facilities and emission stack. Operation would entail receipt, temporary cold storage and cremation of deceased animal remains.

Pet remains are received either via collection from veterinary facilities and private homes or via delivery to the crematorium. Temporary storage of pet remains occur in refrigerated conditions when same day cremation is not possible.

Smaller carcasses will be loaded into the cremator unit via front doors while larger carcasses will be hoisted/loaded through the larger top access of the cremator. A full burn cycle for the maximum capacity of the cremator will take approximately 9 hours.

The balance of the waste (cremated remains) is taken to Vissershok Landfill for disposal. This amounts to approximately 50 kg month and is temporarily stored within the factory unit in 3 x designated wheelie bins with lids.

The cremation process does not generate effluent sewage. The addition of an on-site crematorium will therefore not increase effluent and sewage currently generated by the facility. Cremation uses no water in the process. No additional water will therefore be used by the facility when on site cremation is undertaken. All structures and hard stands that generate stormwater runoff is already in place. Hence, no additional stormwater will be generated when compared to the status quo.

The cremator unit itself is prefabricated with a robust mild steel casing, seam welded and suitably stiffened/braced where necessary. The proposed unit has multi layered refractory lining of fire bricks and insulation bricks. The unit will be fitted with a steel stack of 12.2 m in height and 350 mm in diameter. The height of the cremator unit where the stack will be attached is 2,145m and the roof height of the factory unit is 4.95m. Therefore, approximately 2.8m of the stack will be inside the factory unit, whilst approximately 9.4m will extend beyond the roof height.

The cremator and abatement equipment will require single phase electricity to operate the electronic components (i.e., control units, fans etc.). Electricity usage will be limited, estimated at 3500 kWh per month. The existing 240v, 16 Amp single phase power supply will be utilized. Backup power will be provided by an inverter that is linked to a battery system. This system will provide power for the cold storage units for a minimum of 4 hours.

The burners on the cremator run on fuel and will use diesel to fuel the burners. The cremator unit will use 14-16 litres of diesel per hour of operation. A maximum of 200 ℓ of diesel will be stored at the facility. The Applicant has already identified a service provider that would top up the tank every 3 days.

The following is pertinent in respect of the fuel storage:

- Fuel will be stored in a 200 ℓ slimline 3mm mild steel tank.
- The tank will be a self-bunded (double walled) vessel and will therefore be fitted with a bund to contain any leaks.
- The tank and installation will meet the requirement of SANS10131.

- The tank will have a vent to the outside wall of the facility and will be fitted with a flame arrestor.

The installation of the cremator unit as well as the related fuel storage facilities and emission stack will occur within the existing facility and no expansion to the developed footprint (measuring 113m² in extent) will occur.

An existing road network will be used to access the site. The facility can be approached via the front (a parking embayment off Fabriek Street) or the rear, from Potgieter Street, through the parking area of "Tradelink Park" development.

This Alternative ensures the optimal use of existing space within the developed footprint of the existing facility.

"No-Go" Alternative

The "No-Go" alternative would result in maintaining the "status quo". In this instance, the No-Go Alternative would entail the continued use of the site as a business that handles pet remains, including temporary storage in refrigerated conditions and offering off site cremation services. However, since Alternative 1 (i.e., the preferred alternative) will not result in unacceptable environmental impacts, the "No-Go" alternative was not warranted.

3. Impact Assessment and Mitigation measures

3.1. Activity Need and Desirability

There are only two crematoriums within reach of the Flora Pets premises that provide domestic pet cremations. There are:

- Worcester ICOSA Crematorium a distance of 125kms from our premises and
- Last Monument Crematorium, Paarl a distance of 61kms from our premises.

The latter facility has been used by Flora Pets for the past 8 years. Neither of the above crematoriums however provide a larger animal cremation service for animals such as horses, ponies, alpaca's, big cats (from rescue organisations), etc. Flora Pets receive frequent enquiries for the cremation of these animals and, in absence of a facility that can accommodate cremation of animals of this size, the owners are left with no other option but to bury the carcass on their properties, or have it disposed of at the Vissershok landfill site.

Both crematoriums listed above are human crematoriums and therefore the cremation of pets is an ancillary operation for them. With the current COVID 19 pandemic and resultant demand for human cremations, pet cremations are a low priority. This results in dozens of animal carcasses having to be stored for lengthy periods awaiting the crematoriums capacity to deal with them. This is an alarming situation which results in pet carcasses having to be stored for up to 3 weeks before cremating. A dedicated pet crematorium will alleviate this pressure and will mean that animals can be cremated within a day or two of having been collected.

The need and desirability of a crematorium is also inherently linked to the fact that cremation is ecologically more sustainable when compared to in ground burials. The impact of burials on soil and ground water quality is far under emphasized. This is especially true for animals (pets and farm animals) given that most are euthanised.

The establishment of an in-house crematorium dedicated to pets, will create four new full time job opportunities at the facility. These jobs will be collection staff (currently undertaken by the owner and a casual worker) and cremator operating staff. The Flora Pets owner will then take on a managerial role. Should the business continue to grow as anticipated, then the number of new employment opportunities can easily double within the next 3 years. The estimated capital value of the total investment will amount to R1,5 million.

The proposed crematorium facility is deemed compatible with the existing industrial land use and is allowed in terms of the General Industrial I zoning of the property. No consent use or further approvals are required in this regard.

The Cape Town Spatial Development Framework (2017) designates the site as part of a 'consolidation area', promoting the optimisation of existing zoning categories and a focus on intensified land uses as a desired land use outcome. The proposed pet crematorium presents the optimal use of the existing industrial zoning of the site.

3.2. Air quality Impacts

An Atmospheric Impact Report (compiled by WSP Group Africa (Pty) Ltd and dated 09 September 2021) was undertaken to determine the air quality impacts due to the proposed installation of the cremator unit as well as the related fuel storage facilities and emission stack.

Dispersion modelling was conducted using the Level 2 atmospheric dispersion model, AERMOD, as prescribed in the Regulations Regarding Air Dispersion Modelling (GNR 533, 11 July 2014). Predicted concentrations were compared with the relevant National Ambient Air Quality Standards (NAAQS) to assess compliance. Assessment of cumulative impacts was not possible due to the lack of background monitoring data for the area.

Fugitive PM, NO₂ and CO emissions from the cremator stack, paved roads and vehicle tailpipes (facility owned vehicles) were included into the dispersion model. The worst-case scenario was modelled for each pollutant.

As expected, the highest concentrations of PM₁₀, PM_{2.5}, NO₂ and CO are predicted around the stack area, however concentrations are well below the standards for the 24 hour and annual average scenarios; no exceedances expected. Concentrations at the fence line and at all sensitive receptors are also predicted to be well below the standards in the long- and short-term scenarios. The facility is therefore predicted to be compliant with the standards for all the concerning pollutants.

The National Framework for Air Quality Management in South Africa calls for air quality assessment in terms of cumulative impacts rather than the contributions from an individual facility. Cognisance must also be taken of future permits that could approve new emission sources. This was however not possible for the Flaura Pets facility due to the lack of background air quality data representative of the study area.

Based on the dispersion model predictions and calculated low impact significance (through the use of an impact assessment ratings matrix), the specialist concluded that the activities from the proposed Flaura Pets cremation operations will have minimal impact on the receiving environment and recommended that the proposed development be approved.

An Atmospheric Emissions License in terms of the National Environmental Air Quality Act, 2004 (Act No. 39 of 2004) is required from the relevant licensing authority (in this instance the City of Cape Town) and will be applied for.

3.3. Noise Impact

The site lies within an existing industrial area. There will be several industrial operations that contribute to ambient noise levels in the area. At the time of the site visit, noise levels were not excessive inside or outside the Flaura Pets industrial unit, or within a 50 m radius from the site.

The cremation unit and extractor will operate within the existing factory building. Operation of the unit will generate noise. The manufacturer of the cremation equipment considered by the applicant indicated that the noise levels measured as 80 dB beside the cremator unit, reduced to 57 dB at a distance of 5 m from the unit. To put this into context, heavy traffic or a noisy restaurant will have a level of 80 dB, normal conversation takes place at 70 dB and a 'quiet'

office will measure around 60 dB. The potential noise impacts will be of low negative significance post mitigation. Mitigation measures have been included in the EMPr.

3.4. Waste management

Cremated remains of animal carcasses (and medical waste) are the only solid waste produced by the proposed cremation component on site. Approximately 70 of cremated remains are returned to pet owners. The balance of the waste (cremated remains) is taken to Vissershok Landfill for disposal. This amounts to approximately 50 kg per month and is temporarily stored within the factory unit in 3 x designated wheelie bins with lids. Temporary storage of waste will not exceed 3 months. All legal requirements will be met in relation to waste management including the general storage of waste included in Section 21 of the National Environment Management: Waste Act.

City of Cape Town confirmed (in their correspondence dated 14 May 2021) that Solid Waste (Collections) as the Service Provider in Strand Area has no objection to the proposed pet crematorium and has sufficient unallocated capacity to accept and collect and dispose of all types of waste to a designated licence landfill site.

All other waste streams are already generated by the existing Flauro Pets operations on site and is managed through implementation of responsible waste management practices.

Further, this Department's Waste Management Directorate confirmed (in their correspondence dated 07 April 2021) that the types of waste generated at the existing facility will not require a waste management licence. The potential waste impacts will be of very low negative significance post mitigation. Mitigation measures have been included in the EMPr.

3.5. Freshwater impacts

According to the Freshwater Screening Report (compiled by Mr. Stuart Barrow and Mr. Dana Grobler of BlueScience and dated 12 January 2021), a seep wetland area is located within an Eskom servitude approximately 95m north west of the subject property.

The nearest mapped critical biodiversity area and ecological support area are approximately 1 460m away from the site in the lower reaches of the Lourens River. The nearest protected area is the Lourens River Protected Natural Environment, which is approximately 640 meters from the site.

The specialists concluded that the pet crematorium poses no threat to freshwater resources. Furthermore, operation of the crematorium within the building on Erf 22379 will not result in the changes to bed, banks, course or characteristics of a watercourse in the area, nor will it result in the diverting, impeding of flow within a watercourse. Therefore, the crematorium does not trigger any requirement for authorisation in terms of the National Water Act, 1998 (Act No. 36 of 1998).

Measures to prevent pollution of stormwater and groundwater are included in the EMPr.

3.6. Fire and safety impacts

Potential fire, health and safety impacts associated with the construction and operational phases of the proposed development have been identified and assessed. Mitigation measures have been included in the EMPr.

3.7. Dust and odour impacts

Potential dust and odour impacts associated with the construction and operational phases of the proposed expansion have been identified and assessed. Mitigation measures have been included in the EMPr.

3.8. Heritage impacts

Heritage Western Cape indicated (in their correspondence dated 03 August 2021) that there is no reason to believe that the proposed development on the site, will impact on heritage resources and therefore no further action under Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) is required.

3.9. Services

The proposed development will only be requiring services for solid waste collection and the supply of electricity.

City of Cape Town has confirmed (in their correspondence dated 14 May 2021) that the service provider in Strand Area has sufficient unallocated capacity to accept and collect and dispose of all types of waste to a designated licence landfill site.

City of Cape Town also confirmed (in their correspondence dated 18 May 2021) that there is enough electrical capacity for the proposed development.

The development will result in both negative and positive impacts.

Negative Impacts include:

- Potential air quality impacts;
- Potential nuisance impacts associated with fugitive emissions and noise; and;
- Potential visual impacts;

Positive impacts include:

- Maximum use of the existing facility for the installation of the equipment for the cremation process;
- Accommodating the cremation of larger animals;
- Some employment opportunities.

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.

Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, 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.”*

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