



Reference No: 19/2/5/1/A4/4/WL0165/22

For Attention: Mr. Abraham Avenant

The Board of Directors
CRDC SA (Pty) Ltd.,
11 Villa Palazzo, Belami Drive
SONSTRAAL HEIGHTS
7500

E-mail: abraham@crdc.global

**WASTE MANAGEMENT LICENCE IN TERMS OF THE NATIONAL ENVIRONMENTAL
MANAGEMENT: WASTE ACT, 2008 (ACT NO. 59 OF 2008) AND THE ENVIRONMENTAL
IMPACT ASSESSMENT REGULATIONS, 2014, FOR THE PROPOSED CRDC PLASTIC
WASTE-TO-AGGREGATE FACILITY ON A PORTION OF ERF 921, BLACKHEATH, CAPE
TOWN**

WASTE MANAGEMENT LICENCE

A. DECISION

I, Lance McBain-Charles, in my capacity as the Acting Director: Waste Management of the Department of Environmental Affairs and Development Planning (hereinafter referred to as "the Department"), in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), as amended ("NEM:WA"), read with the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended ("NEMA"), Environmental Impact Assessment (EIA) Regulations, promulgated in terms of Government Notice (GN) No. R. 982 of 4 December 2014, as amended, hereby issue this Waste Management Licence (hereafter referred to as "the Licence") to the

above-mentioned Licence Holder, for the plastic waste-to-aggregate Facility on a portion of Erf 921, Blackheath.

B. DESCRIPTION OF ACTIVITY

CRDC SA (Pty) Ltd., ("CRDC") is proposing the establishment of a plastic waste-to-aggregate manufacturing facility on a portion of the Cape Concrete property, Blackheath. The site falls within the established Wimbledon Estate industrial area and is zoned for general industrial use.

The proposed facility will occupy the existing structures and infrastructure in a 2035 m² area of the larger Cape Concrete premises. The area in question currently houses the CRDC pilot plant (which operates under the threshold requiring a waste management licence), as well as a styrofoam brick manufacturing facility. The latter is in the process of vacating the property. The construction phase of the proposal will therefore be limited to the installation of the equipment.

A 24-hour operation is proposed with staff working three shifts.

In summary, the manufacturing process (and operations at the proposed facility) will entail:

- Receipt of plastic feedstock (waste), separated according to the type, and temporary storage in bins. The process can utilise all 7 types of plastic grades (Resins 1-7). At full capacity, the Facility will have the capacity to process up to 1209 tons of plastic per month.
- Shredding of the plastics (still separated) to approximately 1cm² pieces in sealed shredding machines.
- Batching of various types of shredded feedstock with the addition of calcium hydroxide (lime) and ash (fly ash, organic ash, etc.). Approximately 65 tons each of lime and ash will be used per month, for the processing of the 1209 tons of plastic. Batching will take place in closed ribbon mixers and yields a powder-coated plastic particulate or pre-conditioned resin feedstock (PRF). This waterless pre-conditioning process eliminates odours.
- The PRF will be conveyed to the extruders.
- Extrusion will then convert the PRF to eco-aggregate through a heat and chemical process. Heat application remains below 230°C and therefore below the hydrochloric acid (HCl) gasification point of polyvinyl chloride (PVC) (which is the only plastic type that produces HCl). Lime is added as a safeguard in the event that a HCl off gassing accidentally happens. The lime reacts with the HCL to produce calcium chloride (a harmless salt). A ventilation system with scrubbers will be installed. The eco-aggregate constitutes an inert hybrid mineral-polymer.

- The eco-aggregate will be cooled in water baths. Water from a cooling tower will be recycled through the process via a chiller and filter.
- Chipping and screening of the eco-aggregate will take place in a sealed unit to generate the final product, known as “RESIN8”, a concrete additive.

No further infrastructure is required as the service infrastructure to the existing facilities is acceptable. The following municipal services are however required:

- Monthly average of 15 000 litres (15kl) of water. Existing water supply pipelines will be utilised.
- Monthly electricity demand of 576 kWh, which will be supplied via existing infrastructure.
- Reticulation and treatment capacity for approximately 11 250 litres of domestic sewage. The existing connections to the municipal sewer will be used.

Sufficient allocated electrical capacity is available for the Facility. The City of Cape Town confirmed capacity for solid waste collection and disposal, to provide and reticulate potable water and to convey sewage to the Zandvliet Wastewater Treatment Works (WWTW).

Given the use of existing structures, the Facility will not generate more stormwater compared to the status quo, therefore site drainage and management will be unaffected.

Fuel use will be limited to approximately 2 500 litres per month for the loader. Fuel will be obtained from Cape Concrete's existing fuel storage facilities. Therefore, no fuel storage is proposed at the CRDC Facility.

The following activities, identified in the NEM:WA “*List of waste management activities that have, or are likely to have, a detrimental effect on the environment*”, published as Government Notice (GN) No. 921 of 29 November 2013, as amended, are hereby authorised:

Category A

- 3(6) *The treatment of general waste using any form of treatment at a facility that has the capacity to process in excess of 10 tons but less than 100 tons per day calculated as a monthly average, excluding the treatment of organic waste using composting and any other organic waste treatment.*
- 3(11) *The construction of a facility for a waste management activity listed in Category A of this Schedule (not in isolation to associated waste management activity).*

The storage of waste at a facility that has the capacity to store in excess of 100 m³ of general waste and/or 80m³ of hazardous waste at any one time, excluding the storage of waste in lagoons or temporary storage of such waste, would require the applicant to comply with the NEM:WA "*Norms and Standards for Storage of Waste*", published as Government Notice (GN) No. 926 on 29 November 2013.

The sorting, shredding, grinding, crushing, screening, chipping or bailing of general waste at a facility which has an operational area of more than 1000m², must comply with the NEM:WA "*National Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening, Chipping or Bailing of General Waste*", published as GN No. 1093 on 11 October 2017.

In this Licence, "Director" means the Director: Waste Management of the Western Cape Department of Environmental Affairs and Development Planning, who may be contacted at the address below:

Director: Waste Management
Department of Environmental Affairs and Development Planning
Private Bag X9086

CAPE TOWN

8000

In this Licence, "Director: RPW" means the Director: Resource Protection and Waste of the National Department of Water and Sanitation: Western Cape Provincial Operations, who may be contacted at the address below:

Director: Resource Protection and Waste
Department of Water and Sanitation
Private Bag X16

SANLAMHOF

7532

The granting of this Waste Management Licence is subject to compliance with the conditions set out in Section C below.

C. LICENCE CONDITIONS

LICENCE NUMBER: 19/2/5/1/A4/4/WL0165/22
WASTE APPLICATION: PROPOSED CRDC PLASTIC WASTE-TO-AGGREGATE FACILITY ON A PORTION OF ERF 921, BLACKHEATH, CAPE TOWN
LOCATION: PORTION OF ERF 921, BLACKHEATH, CAPE TOWN
LICENCE HOLDER: CRDC SA (PTY) LTD.
CONTACT PERSON(S): MR. ABRAHAM AVENANT
ADDRESS: 11 VILLA PALAZZO, BELAMI DRIVE, SONSTRAALHEIGHTS, 7500

Details of the Applicant:

The Board of Directors
CRDC SA (Pty) Ltd
11 Villa Palazzo, Belami Drive

SONSTRAAL HEIGHTS

7500

Cell: 083 660 6527

Email: abraham@crdc.global

CRDC is referred to as the "Licence Holder".

Details of the Environmental Assessment Practitioner (EAP):

In Clover Environmental Consulting (Pty) Ltd

Contact person: Ms. Ingrid Eggert

PO Box 3420

TYGERVALLEY

7536

Cell: 083 278 7107

E-mail: ingrid@inclover.co.za

1. LOCATION

- 1.1 The Licence authorises CRDC to operate a plastic waste-to-aggregate Facility on a portion of Erf 921, Blackheath, in the Western Cape Province (hereinafter referred to as "the Facility").
- 1.2 The location of the Facility must be according to co-ordinates indicated in the Waste Management Licence Application Additional Information Annexure, dated October 2022, and the points indicated on the locality map in the final Basic Assessment Report (BAR), received by the Department in December 2022, which are defined as follows:

Number of corner	Latitude (S)	Longitude (E)
A	33° 57' 20.12"	19° 41' 30.98"
B	33° 57' 19.38"	19° 41' 32.58"
C	33° 57' 21.47"	19° 41' 31.96"
D	33° 57' 20.74"	19° 41' 33.59"

- 1.3 Location of the property on which the Facility is situated:

Latitude (S)	Longitude (E)
33° 57' 20.43"	19° 41' 32.27"

- 1.4 The size of the section of the property (Erf 921) within which the activity is undertaken is approximately 2035m².
- 1.5 The SD Digit code of the proposed site: C06700020000092100000.

2. APPOINTMENT OF A WASTE MANAGEMENT CONTROL OFFICER/ ENVIRONMENTAL CONTROL OFFICER

- 2.1 A Waste Management Control Officer ("WMCO") or Environmental Control Officer ("ECO") must be appointed, who will monitor and ensure compliance and the correct implementation of all mitigation measures and provisions as stipulated in the Licence and Environmental Management Programme ("EMPr"). The WMCO/ ECO must:
 - 2.1.1 Report any non-compliance with any licence conditions or requirements or provisions of NEM:WA to the Licensing Authority through means reasonably available.
 - 2.1.2 Monitor any future construction activities and ensure that the construction plans are in accordance with the approved engineering designs.

3. PERMISSIBLE WASTE

- 3.1 The Licence Holder must prevent the acceptance of any waste not authorised at the Facility.
- 3.2 Any portion of the Facility as demarcated in Condition 1.2 may be used for the CRDC plastic waste-to-aggregate operations.

4. GENERAL MANAGEMENT

- 4.1 The EMPr, dated December 2022, submitted as part of the final BAR, is hereby approved, and must be implemented together with all the conditions of the Licence.
- 4.2 A copy of the Licence and EMPr must be kept at the Facility where the activity will be undertaken. These documents must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the Licence who works or undertakes work at the Facility.
- 4.3 The Facility must be managed by fit and proper persons who are competent in respect of the responsibilities to be undertaken by them.
- 4.4 The Licence Holder shall remain responsible for the Facility, and/or any of its impacts on the environment.
- 4.5 The Licence Holder must notify the Director immediately of events or incidents that may cause significant environmental damage or breach the requirements of the Licence and EMPr.
- 4.6 Waste should be kept in such a way as not to cause any nuisance to the surrounding area.
- 4.7 Staff should receive a basic level of environmental awareness training and be trained on the identification and proper handling of waste.
- 4.8 An Emergency Response Plan (ERP) must be developed, and all staff must be trained in the implementation thereof. The ERP should be regularly updated and must include fire evacuations, injury on duty and accidents caused by unexpected hazardous waste ending up in the Facility.
- 4.9 The Facility must comply with the Noise Control Regulations P.N. 200/2013, as promulgated under the Environmental Conservation Act, 1989 (Act No. 73 of 1989).
- 4.10 The presence of any nuisance conditions must be monitored, and measures must be undertaken to rectify the presence of each nuisance condition. Please note that the results of nuisance monitoring must be kept in terms of Condition 9.
- 4.11 The Licence Holder must prevent the breeding of vectors and vermin at the Facility by using appropriate measures.
- 4.12 To prevent nuisance, pollution and/or littering incidents, the Licence Holder must ensure that all waste storage containers are not overfilled and are covered.

- 4.13 Any complaint from the public must be attended to by the Licence Holder, who must take all reasonable and practical steps to alleviate the cause of the complaint within a reasonable timeframe to the satisfaction of the Department and record it in terms of Condition 9.
- 4.14 Refuse generated at the Facility must be managed in accordance with the Integrated Waste Management Plan, submitted as part of the EMPr dated December 2022, and waste must be discarded in weatherproof bins for disposal at a suitably licenced waste disposal facility.
- 4.15 Duty of care should be exercised in accordance with Section 28 of the NEMA, to prevent pollution and environmental degradation.
- 4.16 Any major chemical spills must be reported and dealt with in accordance with Section 30 of the NEMA.

5. IMPACT MANAGEMENT

5.1 Facility security and access control

- 5.1.1 The Licence Holder must prevent unauthorised access to the Facility.

5.2 General

- 5.2.1 The health and safety of workers and employees at the Facility must be catered for in terms of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993).
- 5.2.2 Sufficient care must be taken when handling hazardous materials to prevent environmental pollution.
- 5.2.3 No waste may be buried at the Facility and may only be disposed of at an authorised waste disposal facility.
- 5.2.4 The Licence Holder must prioritise implementation of the waste hierarchy objectives by ensuring re-use, recovery and recycling of waste prior to disposal, provided that the environment is not negatively impacted upon when carrying out these waste minimisation objectives.
- 5.2.5 The Licence Holder must ensure that accurate records are kept of the mass of incoming waste. The Licence Holder must put a monitoring and measurement plan in place that must amongst others record:
 - 5.2.5.1 The mass of waste received;
 - 5.2.5.2 Storage duration; and
 - 5.2.5.3 Sources of plastic waste.

5.3 Stormwater Management

- 5.3.1 Stormwater must be diverted around all working areas and storage areas. Any stormwater leaving the Facility must conform to the General Standards as per the National Water Act, 1998 (Act No.

36 of 1998) ("NWA"), if released into the environment or be authorised by the City of Cape Town if released to the sewer.

- 5.3.2 All waste management activities must be done on impermeable surfaces to prevent pollution.
- 5.3.3 The stormwater channels, grids, and any sustainable urban drainage systems (SUDS) interventions must be kept clear of any waste or blockages.
- 5.3.4 An area must be demarcated for fuelling and workshop services where applicable. Any hazardous substances and fuel must be kept in storage areas that are bunded to contain 110% of the volume of any hazardous substances and/or fuel being stored, and spill kits must be available on-site to clean up potential spills.

6. INVESTIGATIONS

- 6.1 If, in the opinion of the Director and/or Director RPW, environmental pollution, nuisances or health risks may be or are occurring at the Facility, the Licence Holder must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of the relevant environmental pollution, nuisance and health risk variables, at those monitoring points and such frequency to be determined in consultation with the Director and/or Director RPW. Should the investigation reveal any unacceptable levels of pollution, the Licence Holder must submit a report with mitigation measures to the satisfaction of the Director and/or Director RPW.

7. AUDITING

7.1 Internal audits

- 7.1.1 Internal audits must be conducted quarterly (four times a year) by the Licence Holder and on each audit occasion an official report must be compiled by the relevant internal auditor to report the findings of the audits, which must be made available to the external auditor and to all relevant authorities if requested. The records kept in terms of Condition 9 must also be included in the audit report. Furthermore, the Licence Holder must hold discussions with the Department regarding the planned audit reports to ensure compliance with Condition 7.1.2.
- 7.1.2 The audit report must:
 - 7.1.2.1 Prescribe to the tabular format and utilise the Department's Audit Protocol;
 - 7.1.2.2 Specifically state whether conditions of this Licence are adhered to (0 =Non-Compliance, 1=Partial Compliance, 2 =Compliance) and provide relevant comments for each condition;
 - 7.1.2.3 Include an interpretation of all available data and test results regarding the operation of the Facility and all its impacts on the environment;
 - 7.1.2.4 Specify target dates for the implementation of the recommendations to achieve compliance;

- 7.1.2.5 Specify whether corrective action which was taken for the previous audit's non-compliances was adequate; and
- 7.1.2.6 Be made available to the external auditor to be included in the external audit reports.

7.2 External audits

- 7.2.1 The Licence Holder must appoint an independent external auditor to audit the Facility annually (once a year). This auditor must compile an audit report documenting the findings of the audit in line with Condition 7.2.2 below, which must be submitted by the Licence Holder to the Director within 30 days of the completion of the audit report. Furthermore, the Licence Holder must hold discussions with the Department regarding the audit reports.
- 7.2.2 The audit report must:
 - 7.2.2.1 Present the findings of the audit in a tabular format;
 - 7.2.2.2 Specifically, state whether conditions of this Licence are adhered to (0 =Non-Compliance, 1=Partial Compliance, 2 =Compliance) and provide relevant comments for each condition;
 - 7.2.2.3 Include all audit reports referred to in Condition 7.1 and all actions taken by Licence Holder in response to partial and non-compliances;
 - 7.2.2.4 State whether conditions of this licence are adhered to;
 - 7.2.2.5 Include an interpretation of all available data and test results regarding the operation of the site and all its impacts on the environment;
 - 7.2.2.6 Contain recommendations regarding non-compliances and/or partial compliances and must specify time frames for the implementation of the recommendations by the Licence Holder to achieve compliance. In addition, the audit report must state whether corrective actions taken for the previous audit non-compliances and/or partial compliances was adequate; and
 - 7.2.2.7 Show monitoring results graphically and conduct trend analysis.
- 7.2.3 The first external audit report must be submitted to the Department 12 (twelve) months from the date of issuing of the waste management licence.

8. DEPARTMENTAL AUDITS AND INSPECTIONS

- 8.1.1 The Department reserves the right to audit or inspect the Facility without prior notification at any time and frequency as may be determined by the Director.
- 8.1.2 The findings of these audits or inspections must be made available to the Licence Holder within 60 (sixty) days of the end of the audit or inspection. Information from the audits must be treated in accordance with the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).
- 8.1.3 The Licence Holder must make any records or documentation available to the Director upon request, as well as any other information the Director may require.

9. RECORD KEEPING

- 9.1 The Licence Holder must keep records of all monitoring results, nuisances, and complaints at the Facility.
- 9.2 Accurate records of waste volumes or masses received, recovered, and transferred must be kept at the Facility and reported to the Department as per Condition 10.7.
- 9.3 All records required or resulting from activities required by this Licence must:
 - 9.3.1 Be legible
 - 9.3.1 Be made available and should form part of any audit report;
 - 9.3.2 If amended, be amended in such a way that the original and any subsequent amendments remain legible and are easily retrievable;
 - 9.3.3 Be retained in accordance with documented procedures which are approved by the Department; and
 - 9.3.4 Be made available upon the request of the Director.

10. REPORTING

- 10.1 The Licence Holder must, within 24 (twenty-four) hours, notify the Director of the occurrence or detection of any incident at the Facility which has the potential to cause, or has caused any pollution.
- 10.2 The Licence Holder must, within 14 (fourteen) days, or as specified by the Director from the occurrence or detection of any incident referred to in Condition 10.1, submit an action plan, which must include a detailed time schedule, and resource allocation signed off by management, to the satisfaction of the Director of measures taken to:
 - 10.2.1 Correct the impact resulting from the incident;
 - 10.2.2 Prevent the incident from causing any further impact; and
 - 10.2.3 Prevent a recurrence of a similar incident.
- 10.3 In the event that measures have not been implemented within 21 (twenty-one) days of the incident to address impacts caused by the incident referred to in Condition 10.1, or measures which have been implemented are inadequate, the Director may implement the necessary measures at the cost and risk of the Licence Holder.
- 10.4 The Licence Holder must keep and maintain an incident and complaints register, which must be available at the request of the Director.
- 10.5 The Department must be notified within 7 (seven) days of any changes to the management of the Facility, including the name of the incoming person, together with evidence that such person has the required technical competence.

- 10.6 The Department must be notified within 14 (fourteen) days of the following changes:
- 10.6.1 Licence Holder's trading name, registered name or registered office address;
 - 10.6.2 Particulars of the Licence Holder's ultimate holding company (including details of an ultimate holding where a Licence Holder has become a subsidiary); and
 - 10.6.3 Steps taken with a view to the Licence Holder going into bankruptcy, entering into composition or arrangement with creditors.
- 10.7 The Licence Holder must register and report to the Department's Integrated Pollutant and Waste Information System (IPWIS) URL: <http://ipwis.pgwc.gov.za/ipwis3/public> upon commencement of the activity and as required by the Department.
- 10.8 The Director must be notified without delay in the case of the following:
- 10.8.1 Any malfunction, breakdown of failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution;
 - 10.8.2 The breach of conditions of the Licence; and
 - 10.8.3 Any significant adverse environmental and health effects.
- 10.9 Prior written notification must be given to the Director of the following events and within the specified timeframes:
- 10.9.1 As soon as practicable prior to the permanent cessation of any operational activities;
 - 10.9.2 Full or partial cessation of the activities for a period likely to exceed 3 (three) months; and
 - 10.9.3 Full or partial resumption of all or part of the activities after a cessation notified under 10.9.2 above.

11. LEASING AND ALIENATION OF THE FACILITY

- 11.1 Should the Licence Holder want to alienate or lease the Facility, he/she must notify the Director in writing of such an intention at least 120 (one hundred and twenty) days prior to the said transaction. Should the approval be granted, the subsequent Licence Holder shall remain liable to compliance with all licence conditions.

12. TRANSFER OF THE WASTE MANAGEMENT LICENCE

- 12.1 Should the Licence Holder want to transfer holdership of the Licence, he/she must apply in terms of Section 52 of the NEM:WA.
- 12.2 Any subsequent Licence Holder shall be bound by the conditions of the Licence.

13. REHABILITATION AND CLOSURE OF THE FACILITY

- 13.1 In accordance with GN No. 921 or any amendments thereto, a waste management licence is required for the decommissioning of the Facility. The Licence Holder must therefore submit a waste management licence application should they intend to decommission the Facility.

- 13.2 The Licence Holder must rehabilitate the site or any portion thereof, in accordance with the closure report and rehabilitation plan, which must be submitted to the Department for approval at least 1 (one) year prior to the intended closure of the Facility, or any portion thereof.
- 13.3 The Licence Holder shall remain responsible for the Facility, and/or any of its impacts on the environment, after operations at the Facility have ceased.

14. COMMENCEMENT

- 14.1 This activity must commence within a period of 3 (three) years from the date of issue of the Licence. If commencement of the activity does not occur within that period, the validity of the Licence lapses and a new application for authorisation must be made in order for the activity to be undertaken.
- 14.2 If the applicant anticipates that commencement of the activity will not occur within the 3 (three) years period, they must apply and show good cause for an extension of the Licence at least 6 (six) months prior to its expiry date.

15. GENERAL

- 15.1 This Licence shall not be transferable unless such transfer is subject to Condition 12 above.
- 15.2 This Licence shall not be construed as exempting the Licence Holder from compliance with the provisions of any National and Provincial Legislation and relevant Ordinances, Regulations, By-laws and relevant National Norms and Standards.
- 15.3 Transgression of any condition of the Licence could result in the suspension of the Licence by the Department.
- 15.4 The Licence is valid for a period of 10 (ten) years from the date of issue of the Licence. The Licence may be reviewed at any time before that date. Based on the results of the review, especially compliance with licence conditions or recommendations from the audit reports and/or changing legislation, the Licence can be amended or withdrawn, or the validity period thereof may be extended.
- 15.5 Should the Licence Holder want to conduct the waste management activity beyond 10 (ten) years, the Licence Holder must apply for a review of the Licence at least one year before its expiry date.
- 15.6 Non-compliance with a condition of the Licence may result in criminal prosecution or other actions provided for in Section 67(1) of the NEM:WA.
- 15.7 The applicant must in writing, within 14 (fourteen) calendar days of the date of the decision on the application and in accordance with regulation 4(2) of Government Notice (GN) No. R. 982 of 4 December 2014:
- 15.7.1 Notify all registered interested and affected parties of:

- 15.7.1.1 The outcome of the application;
 - 15.7.1.2 The reasons for the decision as included in Annexure A;
 - 15.7.1.3 The date when the decision was issued;
 - 15.7.1.4 Draw the attention of all registered interested and affected parties to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations of 8 December 2014 (as amended) detailed in Section D below; and
 - 15.7.1.5 Draw the attention of all registered interested and affected parties to the manner in which they may access the decision.
- 15.8 In terms of sections 28 and 30 of the NEMA, and sections 19 and 20 of the NWA, any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore imperative that the Licence Holder reads through and understands the legislative requirements pertaining to the project. It is the Licence Holder's responsibility to take reasonable measures which include informing and educating contractors and employees about the environmental risks of their work and training them to operate in an environmentally acceptable manner.

D. APPEAL OF LICENCE

- 1.1 Appeals must comply with the provisions contained in the National Appeal Regulations, 2014 (GN No. 993 of 2014), as amended.
- 1.2 An appellant (if the holder of the decision) must, within 20 (twenty) calendar days from the date that the notification of the decision was sent to the holder by the Competent Authority:
 - 1.2.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations 2014 (as amended) to the Appeal Administrator; and
 - 1.2.2 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.
- 1.3 An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date that the notification of the decision was sent to the registered I&APs by the holder:
 - 1.3.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014, as amended to the Appeal Administrator; and
 - 1.3.2 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.
- 1.4 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.
- 1.5 The appeal and the responding statement must be submitted to the address listed below:

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

By email: DEADP.Appeals@westerncape.gov.za

Note: For purposes of electronic database management, you are also 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 .

A prescribed appeal form as well as assistance regarding the appeal processes is obtainable from Appeal Authority at: Tel. 021 483 3721, E-mail Marius.Venter@westerncape.gov.za or URL <http://www.westerncape.gov.za/eadp>.

E. DISCLAIMER

Provincial Government, Local Authority or committees appointed in terms of the conditions of the application or any other public authority or organisation shall not be held responsible for any damages or losses suffered by the developer or his successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the developer with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.

Your interest in the future of our environment is greatly appreciated.

ACTING DIRECTOR: WASTE MANAGEMENT

DATE: 2023/04/17

Cc: (1) Ms. Ingrid Eggert, In Clover Environmental Consulting (Pty) Ltd.

E-mail: ingrid@inclover.co.za

ANNEXURE A

REASONS FOR THE DECISION

The reasons for the licence decision, as well as factors affecting the broader development that were considered to ensure the effective implementation of this Licence, are explained below.

The following information available to the Department was taken into account in the Department's consideration of the application:

- (a) The information contained in the Application Form for a Waste Management Licence received by the Department on 21 October 2022, compiled by In Clover Environmental Consultants (Pty) Ltd.;
- (b) The final BAR dated December 2022, compiled by In Clover Environmental Consultants (Pty) Ltd.;
- (c) Comments raised by Interested and Affected Parties (I&AP's) throughout the Public Participation Process, the Applicant and the Environmental Assessment Practitioner's responses thereto;
- (d) An inspection of the Facility was undertaken by Gary Arendse from this Department on 21 April 2023;
- (e) Relevant information contained in the Departmental information base; and
- (f) The objectives and requirements of relevant legislation, policies and guidelines, including Section 2 of the NEMA.

A summary of the issues, which in the Department's view were of the most significance, are set out below.

Alternatives

The following alternative was considered:

Site Alternative

The applicants considered locating on a portion of the Inca Concrete site (Farm 642, Kuilsriver). Location at this premises would also have allowed for use of existing structures. Consideration was however given to the fact that the undisturbed areas of the greater Inca Concrete site are designated as terrestrial Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA). Additionally, compared to the preferred alternative, this location is closer to residential areas (300m), and hence, sensitive receptors. Considering the nature of the proposed CRDC Facility, these sensitivities would however not have rendered the site inappropriate from an environmental perspective.

By co-locating at the premises of a concrete partner, the CRDC facility would not only have access to existing infrastructure, but also an off taker for the end product, RESIN8. Ultimately, the deciding factor was the fact that the concrete partners at this alternative site is not the owner of the property. This would have placed CRDC in a compromised position if the lease agreement between Inca Concrete and the

landowners were terminated for any reason. Therefore, the site was ultimately deemed unsuitable, and not further assessed.

While other alternate sites were also considered, none of these presented as reasonable or feasible options that was further investigated.

Design Alternatives

No other design or layout alternatives were investigated.

Technology Alternative

The trademark CRDC plastic waste processing is the only technology proposed as this produces the concrete filler RESIN8 and therefore meets the applicants' objective to expand their global plastic waste-to-aggregate facilities to South Africa.

No other technology alternatives were considered.

No-go alternative

The "No-go" alternative was not considered as this will mean that the expansion of the Facility will not be able to take place.

Public Participation Process

The Public Participation Process comprised of the following:

- (a) All forms of notification to comply with NEMA EIA Regulation 41 and Section 38 (3) of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)(NEMAQA).
- (b) Advertisements placed in the Daily Voice and Tygerburger local newspapers on 26 October 2022.
- (c) Site notices was placed on the site boundary.
- (d) Adjacent parties and community representative bodies and persons were identified. These stakeholders were notified directly by mail (letter drops) or email of the opportunity to register as an I&AP for the application process.
- (e) Newspaper adverts, site notices and letters/emails of notification advised on the availability of the dBAR for review and comment were made available by In Clover Environmental Consultants (Pty) Ltd., in the form of a Google drive link or an electronic format (CD) for a period of 30 days.
- (f) A hardcopy of the document was placed at the Melton Rose Public Library.

- (g) The pre-application dBAR report was submitted via Google Drive on 26 October 2022 to DEA&DP's Directorates Waste Management, Air Quality Management and Development Management for feedback.

Authorities Consultation

The authorities consulted include the following:

- (a) Eskom Holdings SOC LTD
- (b) The City of Cape Town (Environmental & Heritage Management)
- (c) Heritage Western Cape
- (d) The Department of Water and Sanitation (DWS)
- (e) DEA&DP: Directorate Waste Management
- (f) DEA&DP: Directorate Pollution & Chemicals
- (g) DEA&DP: Directorate Development Management
- (h) Department of Economic Development and Tourism
- (i) Cape Nature: Land Use

Comments and recommendations provided by the relevant authorities have been considered in the evaluation of this application. Where possible and relevant, the conditions imposed by these authorities have been included in the Licence.

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