



**REFERENCE:** 19/2/5/2/F5/16/WL0011/20

The Board of Directors  
Labelle Street Properties (Pty) Ltd  
P.O. Box 121  
**BELLVILLE**  
7535

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**Attention:** Mr. Henry Shaw

**WASTE MANAGEMENT LICENCE (WML) FOR THE PROPOSED LABELLE STREET PROPERTIES (PTY) LTD  
PYROLYSIS PLANT ON THE ERF 12485, REMAINDER OF FARM 771, SWARTLAND MUNICIPALITY WASTE  
MANAGEMENT LICENCE**

**A. DECISION**

I, Eddie Hanekom, in my capacity as the 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) (NEM:WA), as amended, read with the Environmental Impact Assessment (EIA) Regulations promulgated in terms of Government Notice (GN) No. R. 982 of 4 December 2014, hereby issue this Waste Management Licence (Licence No. 19/2/5/2/F5/16/WL0011/20) (hereafter referred to as "Licence"), to the above-mentioned Licence Holder, to recover and treat abattoir general waste at the proposed abattoir facility on Erf 12485, Remainder of Farm 771, Swartland Municipality (hereinafter referred to as "the Facility").

## **B. DESCRIPTION OF THE ACTIVITY:**

The proposed activity involves the treatment of abattoir waste by means of pyrolysis.

The waste to be treated includes organic soft tissue, blood and hair, with the potential to include certain selected organic waste streams such as wood chips/shavings, plastic chips, label/sticker waste, textile waste, plastic Refuse Derived Fuel (RDF), paper pulp waste and recycling MRF tailings.

Pyrolysis is the chemical decomposition of organic matter by heating in the absence of oxygen. This process produces a gas consisting mainly of hydrogen, methane and carbon monoxide which can be combusted in a generator to produce electricity and heat. The wet waste must first be macerated into a small size fraction (<15mm) before being introduced into the drying unit. The dryer is heated using waste heat recovered through the process as well as from the generator.

The waste is dried to 10% moisture content (for about 2 hours) and fed into the Pyrolysis chamber where it is converted into syngas at high temperature (950°C). Pyrolysis tar and oil are condensed and recovered from the syngas to be returned to the pyrolysis chamber for additional energy recovery. The syngas is then filtered and cleaned and fed into the two generators.

The pyrolysis plant will generate a nett 760kW of electrical energy as well as 3.41GJ/hr of heat from an input of 1000kg/hr dry waste material. The heat will be recovered to replace steam that is produced from a coal fired boiler. Some of the syngas will be diverted to the singeing plant to replace LPG as and when required. A small 3% ash residue remains and this can either be landfilled or used in the manufacturing of bricks.

The following activity listed in the NEM: WA, 'List of waste management activities that have, or are likely to have, a detrimental effect on the environment', GN No. 921 of 29 November 2013 (GN No. 921), as amended, are hereby authorised: -

### Category A

- 3 (5) The recovery of waste including the refining, utilisation, or co-processing of waste in excess of 10 tons but less than 100 tons of general waste per day or in excess of 500kg but less than 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
- 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.
- 3 (12) 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).

### Category C

Any conditions under Category C where applicable Norms and Standards are triggered, must be implemented if and when the thresholds are exceeded.

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

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 X 9086

**CAPE TOWN**  
8000

## C. LICENCE CONDITIONS

**LICENCE NUMBER:** 19/2/5/2/F5/16/WL0011/20  
**WASTE APPLICATION:** PROPOSED LABELLE STREET PROPERTIES (PTY) LTD ABATTOIR, PROPOSED PYROLYSIS PLANT  
**LOCATION:** ERF 12485, REMAINDER OF FARM ROZENBERG No 771, MALMESBURY SWARTLAND MUNICIPALITY  
**LICENCE HOLDER:** LABELLE STREET PROPERTIES (PTY) LTD  
**CONTACT PERSON:** HENRY SHAW  
**ADDRESS:** P.O. BOX 121, BELLVILLE 7535

### 1. LOCATION

- 1.1. This Licence authorises Labelle Street Properties (Pty) Ltd to recover and treat general waste at the proposed abattoir facility within the quantity ranges stipulated in the activity listing on Erf 12485, Remainder of Farm Rozenburg No. 771, Malmesbury, Swartland Municipality.
- 1.2. The location of the Facility must be according to co-ordinates indicated in the Waste Management Licence Application Form dated July 2019 and Waste Management Licence Application Additional Information Annexure submitted by the Licence Holder, which is defined as follows:

**Table 1-1: Footprint of the Waste Treatment Facility**

Corner	Latitude	Longitude
1	33°28'52.62"S	18°42'39.12"E
2	33°28'52.49"S	18°42'39.30"E
3	33°28'52.83"S	18°42'39.65"E
4	33°28'52.31"S	18°42'40.34"E
5	33°28'52.83"S	18°42'40.88"E
6	33°28'53.06"S	18°42'40.56"E
7	33:28:52.95"S	18:42:40.43"E
8	33°28'53.35"S	18°42'39.90"E

- 1.3. Entrance of property on which treatment Facility is situated: -

**Table 1-2: Entrance of property**

Latitude	Longitude
33°29'3.56"S	18°42'44.66"E

- 1.4. The footprint of the Facility and its associated infrastructure is 10, 000 m<sup>2</sup>.
- 1.5. The SG 21 Digit code of the Facility is: C04600080001248500000.

## **2. PERMISSIBLE WASTE**

- 2.1. Any portion of the Facility that has been constructed according to Condition 4 of this Licence, may be used for the pyrolysis of abattoir waste such as soft tissue, blood and hair, with the potential to include certain selected organic waste streams such as wood chips/shavings, plastic chips, label/sticker waste, textile waste, plastic RDF, paper pulp waste and recycling MRF tailings.
- 2.2. The Licence Holder must take all reasonable steps to ensure that:
  - 2.2.1. No hazardous waste, including sewage; and
  - 2.2.2. No health care waste, including pharmaceutical waste, as defined by the Western Cape Health Care Waste Management Act, 2007 (Act No. 7 of 2007), is accepted at the Facility.
  - 2.2.3. All loads of waste sourced from outside the Facility must be checked and recorded at the gate to prevent the acceptance of waste that is not permitted by this Licence.

## **3. APPOINTMENT OF WASTE MANAGEMENT CONTROL OFFICER/ENVIRONMENTAL CONTROL OFFICER**

- 3.1. The waste management activities that are authorised by this Licence, must be managed by fit and proper persons who are competent in respect of the responsibilities to be undertaken by them.
- 3.2. A Waste Management Control Officer (WMCO)/Environmental Control Officer (ECO) must be appointed, who will monitor and ensure compliance and correct implementation of all mitigation measures and provisions as stipulated in the Licence and Environmental Management Programme (EMPr) which was submitted together with the final Environmental Impact Assessment Report (EIAR) dated 19 March 2020, prior to any construction activities being undertaken on the Facility. The WMCO/ECO must: -
  - 3.2.1. report any non-compliance with any Licence conditions or requirements or provisions of NEM: WA to the Licensing Authority through means reasonably available;
  - 3.2.2. identify and submit potential measures to the Licence Holder and the Director in respect of waste minimisation, including the reduction, recovery, re-use and recycling of waste; and
  - 3.2.3. monitor any future construction activities and ensure that the closure and/or construction plans are in accordance with the approved engineering design.

## **4. CONSTRUCTION ACTIVITIES**

- 4.1. This Licence and EMP must be made binding to the main contractor as well as individual contractors and should be included in tender documentation for the construction contract.
- 4.2. Should any archaeological artefacts be exposed during excavation, the construction in the vicinity of the finding must be stopped. Under no circumstances shall any artefacts be destroyed. Such an archaeological site must be marked and fenced off, and South African Heritage Resource Agency must be contacted within 48 hours.
- 4.3. The construction contractor attends to drainage of the site during the construction phase in order to avoid ponding of water and/or erosion.

## **5. OPERATIONS**

- 5.1. **Site security and access control**
  - 5.1.1. The Licence Holder must prevent unauthorised access to the Facility, by having the Facility enclosed, and having lockable gates which are locked outside the hours of operation.
  - 5.1.2. The Licence Holder must not accept any waste not authorised at the Site as per Condition 2.1.
  - 5.1.3. The waste management activities must be continually monitored by suitably qualified personnel.

## 5.2. **Impact management**

5.2.1. The Licence Holder must ensure that:

- 5.2.1.1. An emergency preparedness plan is in place and implemented before the commencement of operations;
- 5.2.1.2. All leaks or build-ups of hydrogen, methane, ammonia, liquid petroleum gas and diesel must be prevented by monitoring storage areas and any other areas of the facility where these gases may be emitted;
- 5.2.1.3. No feedstock is brought into the pyrolysis plant while it is undergoing maintenance;
- 5.2.1.4. The area used for the storage of dangerous goods, such as fuel, oil, paint, herbicides and insecticides must be ventilated and bunded to contain 110% of the contents capacity;
- 5.2.1.5. Feedstock and gas are carefully transferred and contained. In the event of a major spill, workers should exercise caution when containing the material. Equipment should be readily available for isolating the spill and reducing potential contamination of surface and ground waters;
- 5.2.1.6. The Facility is operated in such a manner that no nuisance conditions such as noise, odour, vectors, windblown litter or health hazards occur;
- 5.2.1.7. A suitable and safe area for storage of waste material is provided;
- 5.2.1.8. Sufficient care is taken when handling hazardous materials in order to prevent pollution;
- 5.2.1.9. Access routes take into account and cause minimum disturbance to public, or cause disturbance of other areas and avoid erosion and pollution problems;
- 5.2.1.10. Runoff from the site is cleared of any sediment and hydrocarbon contamination and does not enter into the stormwater system. No untreated wastewater should be released into a water resource.
- 5.2.1.11. The health and safety of workers and employees on the Site be catered for in terms of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993).
- 5.2.1.12. Refuse is collected and placed in suitably covered refuse bins on a daily basis, receptacles are emptied regularly and waste is disposed of at a registered or licenced waste management facility.
- 5.2.1.13. All site personnel have a basic level of environmental awareness training.
- 5.2.1.14. All ponds are lined.
- 5.2.1.15. Any complaint from the public must be logged and 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 Director and record it in terms of Condition 10 of this Licence.

## 6. **INVESTIGATIONS**

- 6.1. If, in the opinion of the Director, environmental pollution, nuisances or health risks may be or are occurring on the Site, 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.
- 6.2. If, in the opinion of the Director, water pollution may be or is occurring on the Site, the Licence Holder must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of water quality variables at those monitoring points and such frequency as may be determined by the Department of Water and Sanitation.
- 6.3. Should the investigation carried out as per Conditions 6.1 and 6.2 reveal any unacceptable levels of

pollution, the Licence Holder must submit a report with mitigation measures to the satisfaction of the Director.

## **7. MONITORING**

### **7.1. Water Quality Monitoring**

7.1.1. The Licence Holder must:

- 7.1.1.1. Monitor the quality and quantity of the effluent, including that used for irrigation, on a monthly basis or whichever period is specified by the Municipality or the Department of Water and Sanitation; and
- 7.1.1.2. Record these monitoring results in terms of Condition 10.

### **7.2. Emissions Monitoring**

7.2.1. The Licence Holder must:

- 7.2.1.1. Monitor any emissions identified in the Impact Assessment, namely, ammonia, liquid petroleum gas, nitrogen oxides, sulphur dioxide, carbon monoxide, benzene and volatile organic compounds (VOCs), on a regular basis or at a frequency determined by the Director, and reported on them during the external audit as per Condition 8.2.

## **8. AUDITING**

### **8.1. Internal audits**

8.1.1. Internal audits must be conducted quarterly by the Licence Holder in the format prescribe by the Director and on each audit occasion an official report must be compiled by the relevant auditor to report the findings of the audits, which must be made available to the external auditor specified in condition 8.2. The internal audit must be submitted to the Director.

### **8.2. External audits**

8.2.1. The Licence Holder must appoint an independent external auditor to audit the Site annually (once a year) and this auditor must compile an audit report in the format prescribe by the Director, documenting the findings of the audit, which must be submitted by the Licence Holder to the Director.

8.2.2. The audit report must:

- 8.2.2.1. Specifically, state whether conditions of this Licence are adhered to;
- 8.2.2.2. Include an interpretation of all available data and test results regarding the operation of the site and all its impacts on the environment;
- 8.2.2.3. Specify target dates for the implementation of the recommendations to achieve compliance; and
- 8.2.2.4. Specify whether corrective action which was taken for the previous audits' non-conformances was adequately addressed.

## **9. DEPARTMENTAL AUDITS AND INSPECTIONS**

- 9.1. The Department reserves the right to audit or inspect the Site without prior notification at any time and frequency as may be determined by the Director.
- 9.2. The findings of these audits or inspections must be made available to the Licence Holder within sixty (60) 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).
- 9.3. The Licence Holder must make any information records or documentation available to the Director upon request.

## **10. RECORD KEEPING**

- 10.1. The Licence Holder must keep records of all monitoring results, waste quantities, nuisance conditions such as flies, vermin and odours occurring and complaints from these nuisance conditions at the facility.
- 10.2. All records required or resulting from activities required by this Licence must:
  - 10.2.1.1. Be legible;
  - 10.2.1.2. Be made available and should form part of the external audit report;
  - 10.2.1.3. If amended, be amended in such a way that the original and any subsequent amendments remain legible and are easily retrievable;
  - 10.2.1.4. Be retained in accordance with documented procedures which are approved by the Department; and
  - 10.2.1.5. Be made available upon the request of the Director.

## **11. REPORTING**

- 11.1. The Licence Holder must, within 24 hours, notify the Director of the occurrence or detection of any incident on the Site which has the potential to cause, or has caused any pollution.
- 11.2. The Licence Holder must within 14 days, or such time specified by the Director, from the occurrence or detection of any incident referred to in condition 11.1, 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 –
  - 11.2.1.1. Correct the impact resulting from the incident;
  - 11.2.1.2. Prevent the incident from causing any further impact; and
  - 11.2.1.3. Prevent a recurrence of a similar incident.
- 11.3. In the event that measures have not been implemented within 21 days of the incident referred to in condition 11.1 to address impacts caused by such incident, or the measures which have been implemented are inadequate, the Director may implement the necessary measures at the cost and risk of the Licence Holder.
- 11.4. The Licence Holder must keep and maintain an incident and complaints register, which must be available at the request of the Director.
- 11.5. The Department must be notified within seven (7) days of any changes to the management of the Site including the name of the incoming person together with evidence that such person has the required technical competence.
- 11.6. The Department must be notified within 14 days of the following changes:
  - 11.6.1.1. Licence Holder's trading name, registered name or registered office address;
  - 11.6.1.2. Particulars of the Licence Holder's ultimate holding company (including details of an ultimate holding where a Licence Holder has become a subsidiary); and
  - 11.6.1.3. Steps taken with a view to the Licence Holder going into bankruptcy, entering into composition or arrangement with creditors.
- 11.7. The Licence Holder must register and report to the Department's Integrated Pollutant and Waste Information System (IPWIS) on the following website: <http://ipwis.pgwc.gov.za>.

## **12. LEASING AND ALIENATION OF THE FACILITY**

- 12.1. 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.

### **13. TRANSFER OF LICENCE**

- 13.1. Should the Licence Holder want to transfer ownership of this Licence, he/she must apply in terms of Section 52 of the NEM: WA, 2008.
- 13.2. Any subsequent Licence Holder shall be bound by the conditions of this Licence.
- 13.3. The rights granted by this Licence are personal rights (i.e. not attached to a property but granted to a natural or juristic person). As such, only the Licence Holder may undertake the activities authorised by the Licensing Authority. Permission to transfer the rights and obligations contained herein must be applied for in the following manner: –
  - 13.3.1. The applicant must submit an original signed and dated application for an amendment of the Licence to the Licensing Authority stating that he/she wishes the rights and obligations contained herein to be transferred, and including: -
    - 13.3.1.1. confirmation that the Licence is still in force (i.e. that the validity period has not yet expired, or the listed activities were lawfully commenced with);
    - 13.3.1.2. the contact details of the person who will be the new Licence Holder;
    - 13.3.1.3. the reasons for the transfer; and
    - 13.3.1.4. an originally signed letter from the proposed new Licence Holder acknowledging the rights and obligations contained in the Licence and indicating that he/she has the ability to implement the mitigation and management measures and comply with the stipulated conditions.
  - 13.3.2. The Licensing Authority will issue an amendment to the new Licence Holder either by way of a new Licence or an addendum to the existing Licence if the transfer is found to be appropriate.

### **14. COMMENCEMENT**

- 14.1. The construction activities of the licensed activity may not commence within 20 (twenty) days of the date of signature of the Licence.
- 14.2. Should the Licence Holder be notified by the Licensing Authority of a suspension of the Licence pending any appeals decision on the authorized activity, they may not commence with the activity until authorised by the Director in writing.
- 14.3. After the 20 (twenty) day appeal period has expired and no good cause to extend the appeal period has been submitted, a written notice must be given to the Department that the activity will commence.
- 14.4. This activity must commence within a period of five (5) years from the date of issue of this Waste Management Licence. If commencement of the activity does not occur within that period, the Licence lapses and a new application for Waste Management Licence must be made in order for the activity to be undertaken.
- 14.5. If the proponent anticipates that commencement of the activity would not occur within the five (5) year period contemplated in Condition 14.4 above, they must apply for and show good cause for an extension of the Licence six (6) months prior to its expiry date.

### **15. GENERAL**

- 15.1. This Licence shall not be transferable unless such transfer is subject to Condition 13 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 Ordinance, Regulation, By-laws and relevant National Norms and Standards.
- 15.3. Transgression of any condition of this Licence could result in the suspension of the Licence by this Department.



- 15.4. This Licence is valid for a period of 10 (ten) years from the date of issue of this Licence. The licence may be reviewed any time after commencement. 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 thereof 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 1 (one) year before the expiry date.
- 15.6. Transgression of any condition of this Licence could result in the suspension of the Licence by the Licensing Authority and may render the Licence Holder liable for criminal prosecution or other actions provided for in Section 67(1) of the NEM:WA, 2008.
- 15.7. In terms of section 28 and 30 of the National Environmental Management Act (Act No. 107 of 1998) (NEMA), and section 19 and 20 of the National Water Act (Act No. 36 of 1998), 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 CONDITIONS**

### **1. 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: Mr 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](mailto:DEADP.Appeals@westerncape.gov.za)

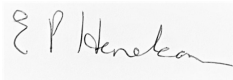
Note: A prescribed appeal form as well as assistance regarding the appeal processes is obtainable from Appeal Authority at: Tel. (021) 483 3721, E-mail [Marius.Venter@westerncape.gov.za](mailto:Marius.Venter@westerncape.gov.za) or URL <http://www.westerncape.gov.za/eadp>

**E. DISCLAIMER**

The Western Cape Provincial Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of the Licence shall not be responsible for any damages or losses suffered by the Licence Holder, the developer or the 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



**EDDIE HANEKOM**  
**DIRECTOR: WASTE MANAGEMENT**  
**DATE OF DECISION: 17-06-2020**

CC: (1) Mr. Larry Eichstadt (Resource Management Services)  
(2) Rondine Isaacs (Development Management) Email:

Email: [larry@rmsenviro.co.za](mailto:larry@rmsenviro.co.za)  
[Rondine.Isaacs@westerncape.gov.za](mailto:Rondine.Isaacs@westerncape.gov.za)

## **ANNEXURE I**

### **REASONS FOR THE DECISION TO ISSUE THE LICENCE:**

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:

- (a) The information contained in the Application Form for a Waste Management Licence dated July 2019;
- (b) The final Scoping Report (SR) dated 27 August 2019, compiled by Resource Management Services;
- (c) The final Environmental Impact Assessment Report (EIAR) dated 14 February 2020, and the resubmitted final EIAR dated 19 March 2020, including the Waste Management Licence Application Additional Information Annexure.
- (d) Comments raised by I&APs throughout the Public Participation Process, the Applicant and the Environmental Assessment Practitioner's responses thereto;
- (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, 1998 (Act No. 107 of 1998).

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

#### **Environment**

The farm is located on the outskirts of the Malmesbury industrial area. An airstrip for light craft aerial sprayers lies on the South Western border of the proposed property. The total size of the farm is □ 20 ha. SG Code: C04600080001248500000. The GPS coordinates are: S 33° 28' 55.23", E18° 42' 40.48".

The surrounding land use is predominantly of an agricultural nature. An airstrip for light aircraft aerial sprayers lies on the South Western border of the proposed property. Nitrophoska Fertiliser Suppliers is situated ± 0,7 km North East of the proposed property.

The preferred site is completely degraded, containing no indigenous vegetation whatsoever and has been transformed to wheat fields.

The freshwater assessment and the botanical assessment completed due to the new service pipeline and powerline alignments have confirmed that the proposed activities will not have any negative impact on the ecological integrity of the receiving environment

#### **ALTERNATIVES**

The following alternatives were considered: -

##### **Site Location Alternatives**

Three site location alternatives were identified, screened and ranked during the Scoping Phase of the EIA process.

Based on the outcomes of the scoping assessment and review phases, Erf 12485, Remainder of Farm 771, Malmesbury was selected as the preferred and only site location alternative for the remaining phases within the EIA process.

##### **Site Layout Alternatives**

Two site layout alternatives were listed on conclusion of the Scoping Process for inclusion in the Impact Assessment Phase. The initial site layout alternative conceptualised during the pre-application and draft scoping phase was reviewed by the MHI Risk Assessment specialists whilst taking into account the proximity of the current crop spraying operations and recommendations were made to ensure that the fuel storage, ammonia plant, proposed waste treatment facility (pyrolysis plant) and the LPG facility

were correctly located from a public and occupational health and safety risk perspective. This site layout alternative was the preferred site layout alternative on conclusion of the Scoping Process.

### **Technology and Treatment Alternatives**

Based on previous assessments and known functional abattoir waste treatment processes within South Africa, the treatment of the abattoir waste stream by either pyrolysis or a rendering plant which will include boilers are currently the on-site waste treatment alternatives being considered with the treatment of the abattoir waste by means of a pyrolysis process being the preferred waste treatment alternative.

### **Effluent and Wastewater Treatment Alternatives**

**The direct discharge of process effluent to sewer with no treatment** on site or the full treatment and partial reuse of the process effluent on site formed the basis of the alternatives compared with the preferred alternative which was partial treatment on site by means of a maturation pond system.

#### **Alternative 2- Process Effluent Direct Discharge to sewer**

The process effluent and domestic sewage is discharged directly to the Malmesbury WWTW via a dedicated pipeline and no on-site treatment of the process effluent stream is considered.

#### **Alternative 3- Discharge to the dedicated-on site effluent treatment system only**

The process effluent is discharged directly to an on-site dedicated effluent treatment system for reuse on site. NB: The option of discharging to the Malmesbury Municipal WWTW would also need to be accommodated for as a contingency measure.

### **Power (Electrical) Supply Infrastructure Alignment Alternatives**

The screening and assessment of feasible electricity/powerline alignment alternatives took into account botanical, aquatic (freshwater) and financial aspects.

### **Energy Reuse/Solar**

The option of fitting the roofed area of the new premises with solar panels to supplement energy supply will be considered as part of the Design Phase of the Project.

### **No-Go Alternative**

This alternative will result in no changes being made or implemented. The Winelands Pork abattoir will continue to use electricity to power the facility

### **Potable Water Supply**

There no alternatives specific to the provision of potable water via the dedicated potable water supply pipeline.

Winelands Pork would be forced to access groundwater resources, obtain river water use water rights should there be capacity within the system or treat the complete process effluent hydraulic volume to a standard that would ensure compliance with the meat and hygiene health regulations. Potable water would need to be provided by means of an alternative method.

### **PUBLIC PARTICIPATION PROCESS (PPP)**

The PPP comprised of the following: -

- (a) Pre-Application draft SR commenting – 8 February to 12 March 2019;
- (b) Notification of stakeholders on stakeholder database, Pre-Application dSR Executive Summary to neighbouring land owners, advertise Pre-Application dSR – Week of 4 February 2019;
- (c) Application Forms to authorities – 12 July 2019;
- (d) 30-Day comment on dSR - 12 July to 16 August 2019;
- (e) Final SR submitted to authority – 27 August 2019;

- (f) Draft EIAR 30-day comment – 8 January to 7 February 2020;
- (g) Final EIAR submitted to authority - 17 February 2020;
- (h) Further dEIAR 30-day comment - 17 February to 18 March 2020; and
- (i) Final EIAR resubmitted to authority – 20 March 2020.

**Authorities Consultation: -**

- (a) CapeNature;
- (b) Cape Winelands District Municipality;
- (c) Heritage Western Cape;
- (d) Department of Environmental Affairs & Development Planning: Air Quality Management;
- (e) Department of Environmental Affairs & Development Planning: Development Management;
- (f) Department of Environmental Affairs & Development Planning: Pollution & Chemical Management;
- (g) Department of Environment Affairs (DEA) Air Quality Management Services Branch: Climate Change and Air Quality; and
- (h) Department of Water Affairs (DWA) regional office, Western Cape.

Comments and recommendations provided by the other relevant authorities have been considered in the evaluation of this application. No authorities objected to the commencement of the activity.

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