



REFERENCE: 19/2/5/7/D6/29/WL0013/20

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Attention: Ms. Betsy Ditcham

Dear Madam

COMMENTS ON THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE DEPOLYMERISATION PROCESSING PLANT ON PORTION 21 OF THE REMAINDER OF THE FARM RHEEBOKSFONTEIN NO. 142, MOSSEL BAY

1. This correspondence refers to the pre-application Basic Assessment Report dated and received by the Department of Environmental Affairs and Development Planning, Sub-directorate: Waste Management Licensing on 28 February 2020.
2. This Sub-directorate: Waste Management Licensing has the following comments:
 - 2.1. The report needs to discuss the waste management aspects in more depth.
 - 2.2. Kindly indicate the capacity of the waste storage and preparation areas in square metres and cubic metres. This Department needs to determine whether norms and standards will have to be adhered to.
 - 2.3. The report does not provide enough information about how 10 to 20 tons of waste will be obtained daily. This Sub-directorate encourages the potential applicant to contact the Municipal Waste Manager about the availability of 10 to 20 tons of feedstock for this plant.
 - 2.4. Please be advised that the Eden District Municipality has changed its name to the Garden Route District Municipality and that the Integrated Waste Management Plans within this district are being or have already been updated. More recent waste characterisation and other information may be available already.
 - 2.5. Based on the definition of treatment in the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), treatment is an activity more intended towards reducing the impact of waste on the environment (e.g. treat type 0 waste to type 1 waste). The definition of recovery is more applicable in this instance.

- 2.6. The following waste listed activities in the "List of Waste Management Activities that have, or are likely to have, a detrimental effect on the environment, 2013", as published in Government Notice No. 921 on 29 November 2013, may be applicable to this proposed development, based on the information received:

Category A (Basic Assessment):

3(3) The recycling of general waste at a facility that has an operational area in excess of 500m², excluding recycling that takes place as an integral part of an internal manufacturing process within the same premises. **[Processing of that separated waste as a product or a raw material]**

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. **[Controlled extraction or retrieval of Heavy Fuel Oil and carbon black from waste plastics and tyres]**

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. **[Change in chemical and physical properties]**

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). **[Construction]**

Category C (Norms and Standards):

5(1) The storage of general waste at a facility that has the capacity to store in excess of 100m³ of general waste at any one time, excluding the storage of waste in lagoons or temporary storage of such waste. **[General waste storage]**

5(6) The sorting, shredding, grinding, crushing, screening or bailing of general waste at a waste facility has an operational area that is 1000m² or more. **[Sorting and preparatory works]**

- 2.7. The Department requires more information about the long-term planning for this facility, especially in the event that the pilot project becomes successful, as space may be limited at the planned location.
- 2.8. The Directorate: Air Quality must be requested to provide comments.
- 2.9. The management of waste under all circumstance must be done in accordance with section 16, the "general duty in respect of waste management", of the National Environmental Management: Waste Act (NEM:WA), 2008 (Act No. 59 of 2008), which states in section 16(1)(d) of NEM:WA:

"A holder of waste must, within the holder's power, take all reasonable measures to manage waste in such a manner that it does not endanger health or the environment or cause a nuisance through noise, odour or visual impacts."

3. The Department reserves the right to revise initial comments and request further information based on the information received.

Yours faithfully



LANCE MCBAIN-CHARLES
DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING
DATE: 2020/04/22