



REFERENCE: 16/3/3/6/7/1/D6/17/0193/19
ENQUIRIES: Shireen Pullen
DATE OF ISSUE: 11 JUNE 2020

The Director
Rooikar Recycling (Pty) Ltd
PO Box 308
MOSEL BAY
6500

Attention: Chrizelda Human

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Dear Madam

PRE-APPLICATION BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED DEVELOPMENT OF A PILOT DEPOLYMERISATION PROCESSING PLANT ON PORTION 21 OF THE REMAINDER OF THE FARM RHEEBOKSFONTEIN NO 142 IN MOSEL BAY, WESTERN CAPE

1. The abovementioned document received by the Directorate: Development Management Development Management (Region 3), hereinafter referred to as "this Directorate" on 28 February 2020 refers.
2. This letter serves as acknowledgement of receipt of the abovementioned document by this Directorate.
3. This Directorate would like to submit the following comments:
 - 3.1 This Directorate only received a cd and no hard copy. Please note that the requirement is to submit at least one hard copy for registration records, as well as for auditing purposes. In future, please ensure that you comply with this requirement.
 - 3.2 After this Department's response to the Notice of Intent, it was confirmed internally that the proposal does not trigger any activities listed in terms of the National Environmental Management Act, 1998: Environmental Impact Assessment regulations, 2014 (as amended on 7 April 2017) ("NEMA EIA Regulations"), since the proposed activity requires a Waste Management Licence, which subsequently excludes the applicability of Activity 6 of Listing Notice 2. As such, this Directorate will only provide comment on the proposal.
 - 3.3 It is understood that the proposal entails the construction of a Pilot Depolymerisation Processing Plant that can process 10 - 20 tons of plastic and/ or tyres per day or both, if required on portion 21 of Farm Rheebofsfontein, Mossel Bay. According to the pre-

application BAR, plastic and typically non-recyclable plastics will be converted into fuel without adding strain on the environment. The process would be a closed loop system and the generated off gasses would be used internally for energy production. Two products would be produced, heavy fuel oil (HFO) and minimal amounts of carbon black (which is a substitute for coal and can be used as a pigment).

- 3.4 Page 13 states that no Air Quality Permit is required, while page 16 states that it still might be required. You are advised to obtain clarity in this regard to ensure that the application is subjected to all relevant legislative requirements.
 - 3.5 Page 13 of the pre-app BAR further states that the NEMA EIA Regulations, 2014 (as amended on 7 April 2017) is applicable to the proposal. As previously stated above, the fact that the application will also be subjected to a Waste Management Licence, Activity 6 of Listing Notice 2 is no longer applicable to the development proposal.
 - 3.6 Please note, should an Air Quality Permit be required, it is advised that the Air Quality and the Waste Management processes must be streamlined in accordance with the One Environmental System to inform the respective decision-making processes. It is therefore the duty of the Environmental Assessment Practitioner ("EAP") to take note of the timeframes and synchronise the processes accordingly. Failure to give effect to the one environmental system may potentially prejudice the success of the application.
4. Further be reminded that paragraph 4.3. of the new Directions issued by the national Department of Environmental Affairs, Forestry and Fisheries determines that an additional 21 days must be added to the remaining 30-days of the public participation process.
 5. Protocols
On 20 March 2020 the National Minister of Environment, Forestry and Fisheries gazetted the procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of Section 24(5)(a) and (h) and 44 of the NEMA, when applying for environmental authorisation (including Waste Management Licences). The procedures came into effect 9 May 2020. This Directorate therefore recommends that these protocols be formally integrated into the project proposal from this point forward.

In light of the above, this Directorate advises that any specialist performing work related to any of the fields of practice listed in Schedule I of the Natural Scientific Professions Act, 2003 (Act 27 of 2003) must be registered with the South African Council for Natural Scientific Professions ("SACNASP")¹ in any of the prescribed categories [Section 18] and further to this, only a person registered with the SACNASP may practise in a consulting capacity [Section 20]. It will therefore be prudent of such specialists performing specialist studies or preparing specialist reports to provide proof of compliance with this Act.
 6. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for undertaking it. Failure to comply with the requirements of Section 24F of the NEMA shall result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.

¹ SACNASP – the legislated regulatory body for natural science practitioners in South Africa.

7. Kindly quote the abovementioned reference number in any future correspondence in respect of this pre-application BAR.
8. This Department reserves the right to revise initial comments and request further information from you based on any new or revised information received.

Yours faithfully

A handwritten signature in black ink, appearing to be 'A. J. ...', written over a horizontal line.

HEAD OF DEPARTMENT

Copied to: Ms. B. Ditchem
Adv. T. Giliomee
Mr. C. van Zyl

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