



REFERENCE: 16/3/3/1/A1/20/3027/22

DATE: 11 August 2022

The Board of Directors
Ikamva Green Holdings trading as Platinum Pride Crematorium
P.O. Box 791
VREDENDAL
8610

Attention: Mr. Sybrand Teubes

E-mail: sybrand.teubes@platinumpride.co.za

Dear Sir

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM AND ASSOCIATED INFRASTRUCTURE ON ERF NO. 2433, MONTAGUE GARDENS.

1. The abovementioned document as received by this Department via electronic mail correspondence on 11 July 2022, this Department's acknowledgement of receipt letter dated 18 July 2022, and the revised Atmospheric Impact Assessment Report dated 24 May 2022, as compiled by YellowTree (Pty) Ltd., as received by this Department via electronic mail correspondence on 21 July 2022, respectively, refer.
2. This Department has considered the draft BAR and has the following comments:
 - 2.1 Environmental Management Programme (“EMPr”):
 - 2.1.1 Table 3 on page 11 must be amended to exclude Activity 10 of Listing Notice 3 and Activity 6 of Listing Notice 2 as these activities are not applicable.
 - 2.1.2 Page 12 must therefore also be amended accordingly.
 - 2.2 Applicable listed activities:
 - 2.2.1 Since more than 80m³ of Liquid Petroleum Gas will be stored on site, Activity 10 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) is not applicable since this listed activity provides for the storage of a dangerous good not exceeding 80m³.
 - 2.2.2 Furthermore, as previously communicated, Activity 6 of Listing Notice 2 is also not applicable.
 - 2.3 Specialist Assessments:
 - 2.3.1 The Health Impact Assessment is a draft report, titled “Draft Rapid Appraisal Health Impact Assessment”. The final Health Impact Assessment must be provided in the BAR and must be made available to all registered I&APs and organs of state.

Further, the specialist's curriculum vitae must be included as an addendum to the Specialist Report, as per the requirements of Appendix 6 of the EIA Regulations, 2014 (as amended).

2.3.2 In accordance with the requirements of Appendix 6 of the EIA Regulations, 2014 (as amended), a complete curriculum vitae of the Air Quality Specialist must be provided, with reference to previous Air Quality Impact Assessments conducted by the specialist.

2.4 Surrounding Environment and Air Quality impacts:

2.4.1 Based on the information provided in the Air Quality Impact Assessment, the Milnerton residential area is located 300 metres to the east of the site. The residential suburbs of Flamingo Vlei, Table View and Parklands are located approximately 1.5 km, 3 km and 5 km, respectively, north west of the site.

2.4.2 According to the Regulations Relating to the Management of Human Remains, 2013, published under the National Health Act, 2013 (Act No. 61 of 2013), the following minimum requirements in respect of any proposed cremation facility must be noted and adhered to:

- The facility must be located at least 500 meters away from any habitual dwelling;
- The chimney must have a height of not less than 3 meters above the apex of the roof;
- The premises shall be kept in a clean, sanitary and in good repair;
- The facility shall be adequately ventilated and illuminated;
- The facility shall be operated and managed in such a manner as to prevent the dispersion of ash into the atmosphere; and
- Emission levels shall conform to the Minimum Emission Standards, as determined in the AEL, in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004).

2.4.2.1 The proposed crematorium (preferred site alternative) is located approximately 300 m from the nearest habitable dwelling and therefore does not meet the minimum requirement to be located at least 500 m away from habitable dwellings.

2.4.3 Although an alternative site was investigated in the Blackheath area, this site is also located within 500m of habitable dwellings, which according to the BAR is not considered as preferred or feasible due to various reasons. Due to the potential air quality and health impacts associated with the proposed development and considering the proximity of the site to nearby residential homes, additional alternative sites which are located further than 500m from habitable dwellings, and are feasible options, must be investigated.

2.4.4 Comments regarding the suitability of the location of the proposed development, from the relevant Organs of State (City of Cape Town: Air Quality and Health and DEA&DP: Air Quality Management), must be obtained in this regard. Since the BAR indicated that the Department of Health and Western Cape Department of Health will be consulted, comments as included from these Departments, must be included in the BAR.

2.5 Confirmation of availability of services:

Since water supply, solid waste removal, electricity supply and sewage disposal services will be provided by the City of Cape Town, you are requested to provide this office with written proof that the municipality has sufficient capacity to provide the necessary services to the proposed development. Confirmation of the availability of services from the service provider must be provided together with the BAR.

2.6 Public Participation Process:

You are required to submit proof of the Public Participation Process being conducted for the draft BAR. This will include (but is not limited to):

- Proof that a copy of the draft BAR was placed at the Milnerton Public Library;
- Proof that the draft BAR was made available to registered interested and affected parties ("I&APs");
- All comments received from I&APs;
- A Comments and Responses Report, indicating all the comments received from I&APs on the draft BAR and the responses thereto; and
- A complete list of registered I&APs.

2.7 Declarations by applicant, Environmental Assessment Practitioner ("EAP") and specialist:

You are hereby reminded to include the signed declarations from the applicant, the EAP and the specialist who compiled the Health Impact Assessment Report with the final BAR.

3. All comments **must be adequately addressed** prior to the submission of the final BAR. It is recommended that a revised draft BAR, which includes the final Health Impact Assessment and assessment of an additional alternative site along with all other required revisions, is circulated to I&APs for comment.
4. In accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 90 days of receipt of the application by the Department, (*i.e.*, calculated from 06 June 2022).

If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (*i.e.*, 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.

5. Please note that the activity may not commence prior to an environmental authorisation being granted by the Department. It is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted in terms of this prohibition is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding ten years, or to both such fine and imprisonment.
6. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.

The Directorate reserves the right to revise or withdraw comments or request further information based on any information received.

Yours faithfully

pp **MR. ZAAHIR TOEFY**
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

CC: (1) Ms. Ameesha Sanker (Sharples Environmental Services cc)
(2) Ms. Sonja Warnich-Stemmet (City of Cape Town)

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