

**GEORGE**

**TEL:** +27 (0) 44 873 4923 **FAX:** +27 (0) 44 874 5953  
**EMAIL:** info@sescs.net **WEBSITE:** www.sescs.net  
**ADDRESS:** 102 Merriman Street, George 6530  
**PO BOX:** 9087, George, 6530

**CAPE TOWN**

**TEL:** +27 (0) 21 554 5195 **FAX:** +27 (0) 86 575 2869  
**EMAIL:** betsy@sescs.net **WEBSITE:** www.sescs.net  
**ADDRESS:** Tableview, Cape Town, 7441  
**PO BOX:** 443, Milnerton, 7435

# COMMENTS AND RESPONSES REPORT

## DRAFT BASIC ASSESSMENT REPORT – POST APPLICATION PUBLIC PARTICIPATION

**PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433,  
MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN  
MUNICIPALITY.**



<b>APPLICANT:</b>	Platinum Pride Crematorium Contact: Mr S Teubes
<b>ENVIRONMENTAL CONSULTANT:</b>	Sharples Environmental Services cc Author: Miss Ameesha Sanker Reviewer: Mrs Betsy Ditcham (EAPASA: 1480)
<b>DEA &amp; DP PROJECT REFERENCE:</b>	16/3/3/1/A1/20/3027/22
<b>SES REFERENCE NUMBER:</b>	24/C-MG/FBAR/CRR/08/2022
<b>DATE:</b>	AUGUST 2022



## Table of Contents

<b>1. Introduction .....</b>	<b>3</b>
1.1. Background Information .....	3
1.2. Public Participation .....	3
1.2.1. Objectives .....	3
1.2.2. What is an Interested and Affected Party? .....	4
1.2.3. Roles and Responsibilities of the Stakeholder .....	4
<b>2. Public Participation to Date.....</b>	<b>5</b>
2.1. Post-Application Phase.....	5
2.1.1. Identification of Key Stakeholders.....	6
2.1.2. Notification Procedures .....	6
2.1.3. Clarification Session Based on the Comments Received .....	8
2.2. Post-Application Phase - Extension .....	8
2.3. Summary of Main Concerns Raised by Stakeholders .....	8
2.3.1. Environmental Health Concerns.....	9
2.3.2. Socio-Economic Concerns.....	31
2.3.3. Technical Concerns .....	34
2.3.4. Need and Desirability .....	46
2.3.5. Other Concerns .....	47
<b>2. Conclusion .....</b>	<b>48</b>

## LIST OF APPENDICES

**APPENDIX A: STAKEHOLDER DATABASE (INLINE WITH POPI,2013).**

**APPENDIX B: MINUTES OF CLARIFICATION SESSIONS.**

**APPENDIX C: PROOF OF PUBLIC PARTICIPATION.**

**APPENDIX D: COMMENTS & RESPONSES TABLES**

# 1. Introduction

## 1.1. Background Information

Platinum Pride Crematorium proposes to establish a crematorium facility on ERF 2433, Montague Gardens, Industrial Area, City of Cape Town. The proposal will entail refurbishing the existing warehouse facility, to accommodate the crematorium and associated infrastructure. The proposed scope of works includes the renovations of the existing warehouse facility as follows:

- Installation of 6 x BA2 cremators (manufactured under a license from Johnson Thermal Engineering (JTE)) specifications include: Locally manufactured and distributed in South Africa; Chamber 1: starved combustion primary chamber cremator, ensuring gas velocities are reduced, resulting in lower particulate pickup; Chamber 2: cremation process begins, from 600°C rapidly rising to control at 850°C or higher to completely combust gases and odours before exiting the stack; Provides 2 seconds of high temperature exhaust gas residence time, to ensuring low carbon monoxide emission and total combustion of complex volatile organic compounds; Cremators: equipped with an ejector in base of the cremator stack to aid with the drafting to maintain a slight negative pressure within the primary chamber, to ensure that no gases or noxious fumes are emitted into the cremator machine room when the door is opened; designed to meet the Air Emission requirements for new plants as specified in NEM:AQA.
- LPG tanks (fuel source for furnaces), approximately 80m<sup>3</sup>.
- 3 x reefer coolers and one cool room. Each reefer can take 60 units, in total.
- Superficial modifications to the inside of the interior and aged exterior (including 6 x chimney stacks approximately 0.35m in diameter, approximately 6m's above the nearest building).

## 1.2. Public Participation

Public participation is intended to be an inclusive and comprehensive process aimed at providing stakeholders with opportunities to express their views, so that these can be considered and incorporated into the decision-making process. Effective public participation requires the disclosure of relevant and adequate project information to enable stakeholders to understand the risks, impacts, and opportunities of the Proposed Project.

Fundamental reasons why public are involved in the BAR process:

- The environment is held in public trust, therefore use of environmental resources is everyone's concern.
- Public participation is proper, fair conduct in public decision-making activities. Focus on vulnerable and disadvantaged persons and offer equitable participation due to historical issues.
- A way to ensure that projects meet the citizens' needs and are suitable to the affected public.
- The project carries more legitimacy, and less hostility, if I&APs are able to contribute towards the decision-making process.
- Finally, the final decision is informed when local knowledge and values are included and when expert knowledge is publicly examined.

### 1.2.1. Objectives

The objectives of the public participation process can be summarised as follows:

- Identify relevant individuals, organisations and communities who may be interested in or affected by the Proposed Project;

- Clearly outline the scope of the Proposed Project, including the scale and nature of the existing and proposed activities;
- Identify viable Proposed Project alternatives that will assist the relevant authorities in making an informed decision;
- Identify shortcomings and gaps in existing information;
- Identify key concerns, raised by Stakeholders that should be addressed in the subsequent specialist studies;
- Highlight the potential for environmental impacts, whether positive or negative;
- Inform and provide the public with information and an understanding of the Proposed Project, issues and solutions;
- Provide for role-players to voice their support, concerns and questions regarding the project;
- Provide the opportunity for role-players to suggest ways for reducing or mitigating any negative impacts of the project and for enhancing its positive impacts;
- Enable the person conducting PP to incorporate the needs, preferences and values of potential or Registered Interested & Affected Parties (RI&AP's) into its proposed development that becomes the subject of an application for an environmental authorization (EA);
- Provide opportunities for clearing up misunderstandings about technical issues, resolving disputes and reconciling conflicting interests;
- Encourage transparency and accountability in decision-making;
- Contribute toward maintaining a healthy, vibrant democracy; and
- Give effect to the requirement for procedural fairness of administrative action as contained in the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000).

### **1.2.2. What is an Interested and Affected Party?**

An I&AP is defined as any person, group of persons or organisations interested in or affected by an activity, and any organ of state that may have jurisdiction over any aspect of the activity.

The difference between an I&AP and a registered I&AP:

- An I&AP can be directly or indirectly impacted on by a proposed activity.
- A registered I&AP is a person whose name has been placed on the list of registered I&APs. According to the PPP Guidance document, 2017, only registered I&APs will be notified:
  - Of the availability of reports and other written submissions made to the Competent Authority by the Applicant, and be entitled to comment on these reports and submissions; and
  - Of the outcome of the application, the reasons for the decision, and that an appeal may be lodged against a decision.

Considering the implementation of the POPI Act, 2013, automatically registered I&AP's are those from state departments, organs of state and organizations, whose interests align with the proposal. Adjacent landowners/occupiers are I&AP's who have been notified via letter-drop or email, and who thereafter may choose to respond and be registered as an I&AP. **Appendix A**, includes the details of the automatically registered I&AP's as well as those that have requested to be registered.

For the purpose of this report, registered I&APs will be referred to as Stakeholders.

### **1.2.3. Roles and Responsibilities of the Stakeholder**

The roles of stakeholders in a public participation process usually include one or more of the following:

- Assisting in the identification and prioritisation of issues that need to be investigated;



- Making suggestions on alternatives and means of preventing, minimising and managing negative impacts and enhancing Proposed Project benefits;
- Assisting in or commenting on the development of mutually acceptable criteria for the evaluation of decision options;
- Contributing information on public needs, values and expectations;
- Contributing local and traditional knowledge; and
- Verifying that their issues have been considered.

In order to participate effectively, stakeholders should:

- Become **involved** in the process as early as possible;
- **Register** as a stakeholder;
- Advise the EAP of other stakeholders who should be consulted;
- **Contribute** towards the design of the public participation process (including timeframes) to ensure that it is acceptable to all stakeholders;
- **Follow the process** once it has been accepted;
- **Read the material** provided and actively seek to understand the issues involved;
- Give timeous **responses** to correspondence;
- **Be respectful and courteous** towards other stakeholders;
- Refrain from making **subjective, unfounded or ill-informed statements**; and
- Recognise that the process is **confined to issues that are directly relevant to the application**.

## 2. Public Participation to Date

### 2.1. Post-Application Phase

The Client provided the following evidence during 2021, based on these concerns the proponent was felt motivated to undertake this development, within the City of Cape Town (CoCT), sources are varied and includes the following:

- In September 2021, the lack of capacity at existing crematoria in Cape Town reportedly led to 107 bodies being transported by truck to the Eastern Cape for cremation (News24, 2021). Upon closer inspection, it was found that approximately 80-100 bodies are transported to the Despatch Crematorium in the Eastern Cape on a weekly basis.
- Funeral parlours in Cape Town, such as Nashca Funeral, concurred that crematoriums in Cape Town have been overcrowded, resulting in a 3 to 4 week waiting period for families to receive the ashes of their deceased family members.
- Several news articles illustrate the lack of capacity at existing crematoriums in Cape Town:
  - 'Covid-19: Cremations at 'record high' at a Cape Town crematorium' (News24, 2 Feb 2021).
  - 'Covid-19: Cape Town crematoriums, burial grounds under strain' (News24, 14 September 2021).
  - 'Inquiry opened into transportation of 106 corpses to Eastern Cape after Western Cape crematoriums overwhelmed' (Daily Maverick, 12 September 2021).
  - 'Crematorium can't cope with volume of bodies in Western Cape needing to be cremated' (Weekend Argus, 28 August 2021).
  - 'Corpses piled in trucks a sign of Covid times, say undertakers' (Daily Maverick, 14 September 2021).
  - 'Overloaded truck was transporting corpses to the Eastern Cape' (Sowetan, 12 September 2021).

Given the urgency highlighted in the evidence supplied, no pre-application public participation process was undertaken, however the pre-application meeting with the Competent Authority, DEA&DP, was undertaken to inform the application process. It was confirmed that given the Listing Notice 1, triggered activity, the exclusion related to the Listing Notice 2 trigger is applicable, and a Basic Assessment Process was confirmed (see Appendix E of the BAR). Therefore, Post-Application Public Participation was undertaken from the 11<sup>th</sup> of July 2022 – 11<sup>th</sup> of August 2022, as the Competent Authority advised on Monday, 11<sup>th</sup> of July 2022, via email, that the end date is calculated from the day after the notification is distributed, i.e., Tuesday 12 July 2022, is day 1.

It is acknowledged that since the start of 2022, the number of COVID19 deaths has significantly decreased. However, since COVID19, there has been more of a recognition and acceptance of cremations as an efficient way to dispose of human remains, as environmental constraints of cemeteries have been highlighted, as well as awareness surrounding pathogen persistence in human remains potentially leading to contamination/infection if not managed properly. Further to this, the City of Cape Town has encouraged the establishment of crematoria in CoCT (Appendix E15 of the BAR).

Following the initial public participation, the City of Cape Town has highlighted that there are shortages of grave sites, and a crematorium facility is encouraged in the area.

#### **2.1.1. Identification of Key Stakeholders**

Section 41 of the 2017 EIA Regulations states that written notices must be given to identified stakeholders as outlined in **Appendix C**.

Relevant authorities (Organs of State and State Departments) have been automatically registered as I&APs. In accordance with the EIA Regulations, 2017, all other persons must request in writing to be placed on the register, or submit written comments or attend meetings in order to be registered as stakeholders and included in future communication regarding the project, **Appendix A**.

A desktop assessment was undertaken in order to ascertain the even of the adjacent affected landowners & occupiers. During the site visit it was acknowledged that the surrounding area is utilized for commercial/industrial purposes, therefore no residential properties were identified as adjacent landowners/occupiers, only business. **Appendix A** provides a list of stakeholders who opted to be registered on the project database, along with the date on which they registered. All adjacent landowners/occupiers were notified via letter-drop if they were present, or via email, a summary of this is included in the Proof of Public Participation (Appendix F2 of the BAR).

#### **2.1.2. Notification Procedures**

Initial notifications, related to the BAR and AEL Public Participation Process were issued as follows:

##### **Direct Notification**

Notification of the proposed project was issued to potential Interested and Affected Parties (I&APs) and stakeholders, via direct correspondence (i.e. email). The purpose of the notification was to offer potential I&APs and Stakeholders the opportunity to register on the project database and provide input into the process to ensure that any concerns could be considered adequately.

All notifications distributed to registered stakeholders are included in **Appendix C** of this report.

##### **Online Notification**

Notification of the proposed public participation period were posted on the SES Facebook page, LinkedIn and Website, on Monday the 11th of July 2022.

Proof is included in **Appendix C** of this report.

### **Advertisement**

Notification of the proposed project was issued to the general public via an advertisement. A newspaper advertisement was placed in the local newspaper (Tabletalk) on 06<sup>th</sup> July 2022 notifying potential Interested and Affected Parties (I & AP's) of the availability of the Post-Application Draft Basic Assessment Report and inviting I & AP's to register on the database as Registered Interested & Affected Parties. This included details on the AEL as well. A copy of the advertisement is included in **Appendix C**.

### **Letter-Drop**

A comprehensive letter was compiled providing a background on the proposed project, what is public participation and Interested and Affected Parties, and how to participate, along with a locality Map. We personally hand delivered the letter to the adjacent properties surrounding the ERF 2433.

This letter drop was conducted in order to notify adjacent landowners of the proposed project. Evidence of the letter drop can be found in **Appendix C**.

### **Site Notice**

An on-site notice of appropriate size, in English, was placed on the light-pole in front of the proposed development site, notifying potential Interested and Affected Parties (I & AP's) of the availability of the Post-Application Basic Assessment Report and inviting I & AP's to register on the database as Registered Interested & Affected Parties. Site notices were also positioned at the Milnerton Public Library and City of Cape Town municipal office in Milnerton. Evidence of the site notices can be found in **Appendix C**.

### **Availability of the Draft Basic Assessment Report**

The Post-Application Draft Basic Assessment Report was placed on public review for a period of 30 days from **11<sup>th</sup> of July 2022 – 11<sup>th</sup> of August 2022 (30+ days)**. An electronic version of the report was placed on the SES website to be accessed by the public. A hard-copy was placed at the Milnerton Public Library.

The Post-Application public participation period was only undertaken after the Application form was completed and submitted to the Department of Environmental Affairs and Development Planning (DEA&DP).

### **External Circulation of Information**

Some adjacent occupiers (stakeholders) present on site during the letter-drop indicated that they were only occupiers and could not divulge the details of their landlords. They therefore requested additional letters or advised that they would email or share their letters with their landlord.

Some I&AP's present on site during the letter-drop indicated that they were landlords and chose to distribute the notification to all tenants.

City of Cape Town advised the EAP that the city Environmental Management Department (EMD) is the official Entry- and Exit point for EIA comment in terms of the City of Cape Town's Systems of

Delegation. Therefore, Mr Morne Theron, advised that all documents be sent to him, and he will delegate to the various internal departments, proof of this email correspondence has been included in **Appendix C**.

The EAP welcomed comment from all sectors of the community in order to understand what issues of concern the stakeholders may have on the proposal. A large amount of time and effort went into preparing the proposal and reports and investigating the impacts of the proposal on the receiving environment as we wanted those who may have comments to have all of the available information before they raise their issues of concern for us to address them in a comprehensive manner.

### **2.1.3. Clarification Session Based on the Comments Received**

The EAP conducted a MS Teams meeting on the 25<sup>th</sup> of August 2022, with the City of Cape Town, and the Department of Environmental Affairs and Development Planning (Region 1), to address their concerns raised during the public participation. Minutes of this meeting have been included in **Appendix B**.

The EAP conducted a MS Teams meeting on the 29<sup>th</sup> of August 2022, with the remaining registered I&AP's, to address their concerns raised during the public participation. Approximately 39% of the registered I&AP's (excluding DEA&DP and CoCT), attended this meeting. Minutes of this meeting have been included in **Appendix B**.

## **2.2. Post-Application Phase - Extension**

### **50-Day Extension**

The original intent was to undertake the public participation as described previously and submit on the original submission date, the 8<sup>th</sup> of September 2022. However, the proponent has opted to pursue an extension, in terms of National Environmental Management Act, 1998 (107 of 1998), in accordance with the EIA Regulations, 2014 (as amended 2017), Section 19 (1)(b). The Final BAR will therefore be submitted within 140 days of receipt of the application, by the competent authority.

This is on the following basis:

- There have been updates to the Specialists Reports.
- During public participation it has been recognized that this project has been contentious, and many concerns were raised that required further clarity.
- DEA&DP raised a concern that I&AP's should be provided with an opportunity to view and comment on the responses to their concerns and the report changes.

Therefore, an additional public participation will be undertaken **from Monday 12th September 2022 until Wednesday 12th October 2022**. A copy of the revised BAR will be positioned in the Milnerton Library.

## **Comments and Responses**

Comments received from registered stakeholders have been captured and responded to within the comments and response tables included in **Appendix D**.

### **2.3. Summary of Main Concerns Raised by Stakeholders**

The Key Issues raised in the "**Post-Application Draft Basic Assessment Stage**" were as follows:

- **Environmental Health Concerns**
  - Concerns related to hazardous air emissions impacting on surrounding businesses.
  - Misconception that the Proposal Will Create Health Issues.

- Concerns Related to Odour & Smoke Affecting Neighbouring Properties.
- **Socio-Economic Concerns**
  - Negative Perceptions of Crematoriums
  - Loss of business and existing or potential tenants as a result of the establishment of a crematorium within close proximity.
  - Cultural Concerns
  - Concern Related to Not Having a Socio-Economic Assessment.
  - Concerns Related to Noise
- **Technical Concerns**
  - Technology Concerns
  - Concerns Raised Regarding Decommissioning of the Existing Manufacturing Facility.
  - Concern related to the 500m Radius to Habitable Dwellings and 300m from a Residential Area (as indicated by the Air Quality Report).
  - Concerns Related to Alternative Sites.
  - Concerns Related to the Services Demand on Site.
  - Concerns Related to LPG and Major Hazard Installation Requirement.
  - Misconception in-terms of the Applicable Legislation.
  - Traffic Concerns.
  - Concerns Related to Electrical Outages.
- **Need and Desirability**
  - Concerns Related to the Need and Desirability of this Proposal.
- **Other Concerns**
  - Comments not Received from Organs of State or State Departments.
  - Concern Related to Proponents Experience in the Industry

For ease of reference, these main concerns are addressed in the following sections.

### **2.3.1.Environmental Health Concerns**

#### **2.3.1.1. Concerns related to hazardous air emissions impacting on surrounding businesses.**

The main pollutants associated with crematorium air emissions includes nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), carbon monoxide (CO), sulphur dioxide (SO<sub>2</sub>), and mercury (applicable to human cremation only). I&AP's raised concerns that the proposed air emissions would be visible.

The National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004) (NEM:AQA) provides for the listing of activities that have or may have a detrimental impact on the environment and require an Air Emissions Licence. These activities and associated minimum emission standards are listed in GN No. 893 of 2013. In terms of the GN No. 893 of 2013 for installations related to cremations of human remains, companion animals (pets) and the incineration of veterinary waste, an AEL must be undertaken for compliance with Subcategory 8.2: Crematoria and Veterinary Waste Incineration.

**Table 1: NEM:AQA Minimum Emission Standards for Subcategory 8.2: Crematoria and Veterinary Waste Incineration**

<b>Description:</b>		Cremation of human remains, companion animals (pets) and the incineration of veterinary waste	
<b>Application:</b>		All installations	
Substance or mixture of substances		Plant status	mg/Nm <sup>3</sup> under normal conditions of 11% O <sub>2</sub> , 273 Kelvin and 101.3 kPa.
Common name	Chemical symbol		
Particulate matter	N/A	New	40
		Existing	250
Carbon monoxide	CO	New	75
		Existing	150
Oxides of nitrogen	NO <sub>x</sub> expressed as NO <sub>2</sub>	New	500
		Existing	1 000
Mercury (Applicable to human cremation only)	Hg	New	0.05
		Existing	0.05

Where was the data sourced from:

Baseline ambient air quality in the area surrounding the proposed crematorium was collected from ambient air quality monitoring stations. Baseline data from the monitoring stations closest to the site, and with the highest level of data availability, were chosen to be used further in the study.

Consideration was given to the surrounding land use (within a 5 km radius)

- The proposed crematorium is to be located at 55 Stella Road in Montague Gardens, Cape Town. Within a 5 km radius of the site, numerous suburbs are zoned for various land uses.
- In the immediate area surrounding the site is the Montague Gardens industrial area.
- Approximately 2 km NNE of the site is the industrial area of Killarney Gardens. Approximately 3 km NNE of the site is the Dunoon informal settlement. Approximately 2.3 km NE of the site are the Richwood and Burgundy Estate residential areas.
- Approximately 1 km E of the site is the Bothasig residential area. Approximately 3 km E of the site is the Durbanville Hills agricultural area.
- Approximately 2.6 km SE of the site is the Edgemoor residential area. The residential area of Summer Greens is located approximately 2.9 km SSE of the site, with the residential area of Acacia Park located 4 km to the SSE.
- Century City's commercial and residential area is located approximately 5 km SSW of the site, with the informal settlement of Joe Slovo Park approximately 2.2 km SW of the site, and the residential areas of Sandrift and Tjgerhof 3.5 km to the SW.
- The boundary of the Milnerton residential area is located 300 metres to 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, NW of the site.

Locations of hospitals, clinics and health care centres were considered, and none were identified within 500m radius of the site. 140 schools were identified in the 10 km surrounding the site, **but none are located in the industrial area** of Montague Gardens in which the crematorium is to be located. The closest schools are those in the residential areas surrounding Montague Gardens (approximately 900m away, as per **Error! Reference source not found.** in the Specialist Report). The closest points to the proposed crematorium on the boundaries of the surrounding residential areas have been identified as discrete sensitive receptors in the air dispersion model. The fence line of the site acts as the boundary for surrounding businesses.

Considering that the proposed crematorium is to be located in a large industrial area, the site is surrounded by numerous contributors to air pollution, including Astron Energy, Permoséal, BP, Engen, Cape Precious Metals, Gayatri Paper and Novus Printing works. The contribution of these sources to air pollution is taken into account when the cumulative impact of the proposed crematorium on air quality is assessed. This is because the baseline data that was used in this assessment **already reflects the effect of the existing contributors to air pollution in the area.**

*How are the pollutants being assessed:*

Normal operating conditions were simulated in the dispersion model. Start-up, standby and shutdown conditions were not simulated, as these are not expected to be significantly different to normal operating conditions.

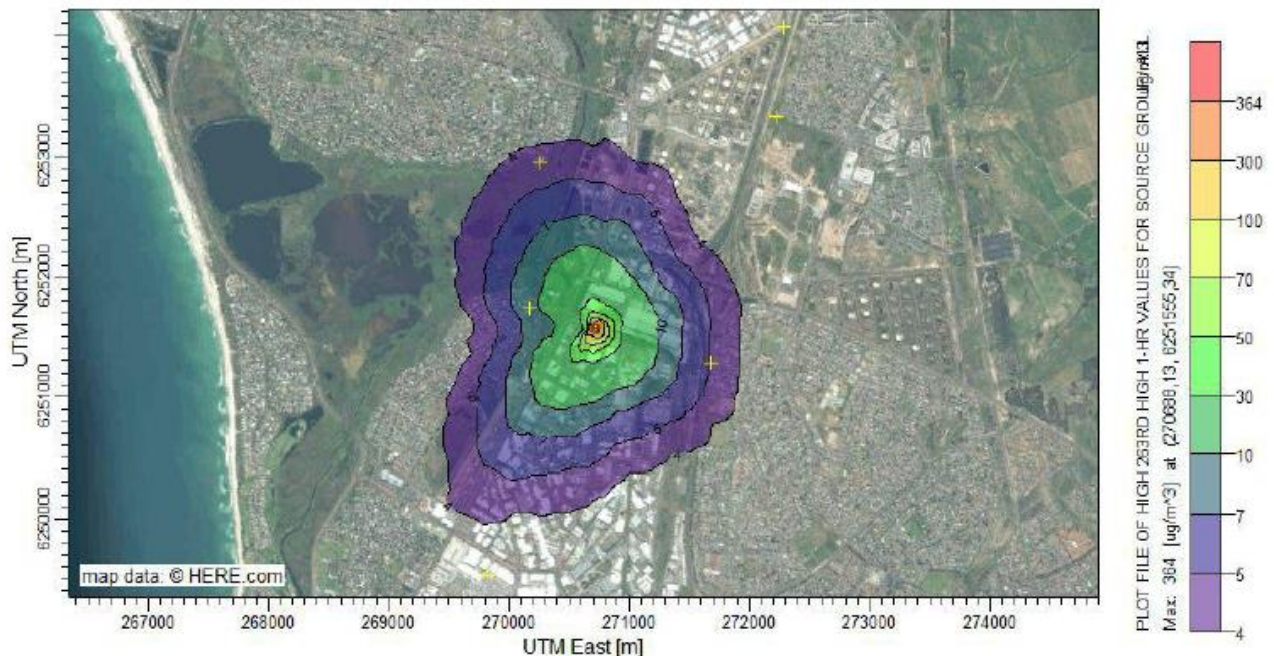
The ambient pollutant concentrations that were predicted by the AERMOD model were added to the baseline air quality data to obtain cumulative predicted concentrations. These concentrations were compared to the NAAQS standards and international guidelines where no NAAQS are available.

*Yellow Tree concluded that:*

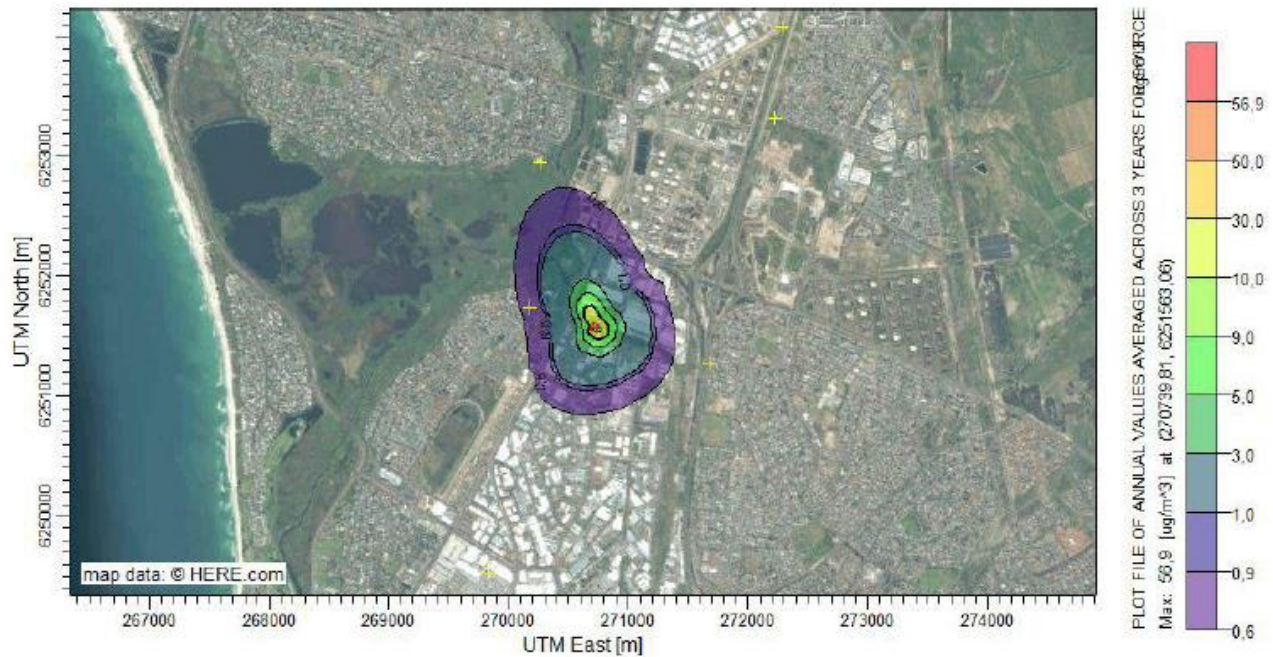
- The **ambient PM<sub>10</sub> (using the Table View baseline data), PM<sub>2.5</sub>, CO, mercury, and lead concentrations at the fence line of the site are predicted to remain in compliance with the NAAQS standards (and the international guideline for mercury)** should the proposed crematorium be commissioned.
- The annual cumulative benzene concentration would have exceeded the NAAQS in 2019, this was also the case in the baseline data before the contribution from the proposed crematorium was considered. **Thus, the benzene concentration as a result of the proposed crematorium does not change the overall compliance status.**
- Maximum ambient hourly NO<sub>2</sub> concentrations at the fence line are predicted to exceed the hourly NAAQS standard. **However, the concentration rapidly decreases with distance from the site, and no NAAQS exceedances are predicted in any of the surrounding residential areas.** It must also be noted that **the cumulative air quality impact of the facility is estimated by assuming that the maximum hourly concentration will be experienced every hour of every day in the three-year period, which would not be the case in reality.** The ambient annual NO<sub>2</sub> concentration at the fence line is predicted to **comply with the annual NAAQS for NO<sub>2</sub>.**

**Table 2: NO<sub>2</sub> Results (Total Conversion Method) (YellowTree, 2022).**

Ave. Period	Parameter	Max Fence Line and Surrounds	Milnerton Ridge Sensitive Receptor	Bothasig Sensitive Receptor	Flamingo Vlei Sensitive Receptor	Richwood Sensitive Receptor	Dunoon Sensitive Receptor	Phoenix Sensitive Receptor
Hourly	Conc. (ppb)	<b>193.37076</b>	<b>4.76203</b>	<b>2.58430</b>	<b>2.17753</b>	<b>0.74043</b>	<b>0.60056</b>	<b>1.33647</b>
	Conc. ( $\mu\text{g}/\text{m}^3$ )	363.80592	8.95923	4.86207	4.09679	1.39304	1.12989	2.51442
	Location	X: 270688.13 Y: 6251555.34	X: 270178.66 Y: 6251740.48	X: 271676.99 Y: 6251279.85	X: 270263.33 Y: 6252948.25	X: 272217.76 Y: 6253325.42	X: 272287.48 Y: 6254074.39	X: 269820.54 Y: 6249534.94
	Elevation	10.00	7.61	24.80	4.83	30.78	36.35	17.95
	Date, Hour	2020-12-07, 07:00	2020-05-16, 02:00	2020-06-17, 18:00	2020-09-02, 04:00	2021-12-10, 21:00	2019-03-07, 01:00	2021-07-30, 01:00
Annual	Conc. (ppb)	<b>30.24871</b>	<b>0.36655</b>	<b>0.16254</b>	<b>0.22838</b>	<b>0.04101</b>	<b>0.03193</b>	<b>0.06384</b>
	Conc. ( $\mu\text{g}/\text{m}^3$ )	56.90963	0.68962	0.3058	0.42967	0.07716	0.06007	0.12011
	Location	X: 270739.81 Y: 6251563.06	X: 270178.66 Y: 6251740.48	X: 271676.99 Y: 6251279.85	X: 270263.33 Y: 6252948.25	X: 272217.76 Y: 6253325.42	X: 272287.48 Y: 6254074.39	X: 269820.54 Y: 6249534.94
	Elevation	11.32	7.61	24.80	4.83	30.78	36.35	17.95
	Date	-	-	-	-	-	-	-

**Figure 1: Isopleths of Hourly NO<sub>2</sub> Concentration Around the Proposed Crematorium (YellowTree, 2022)**



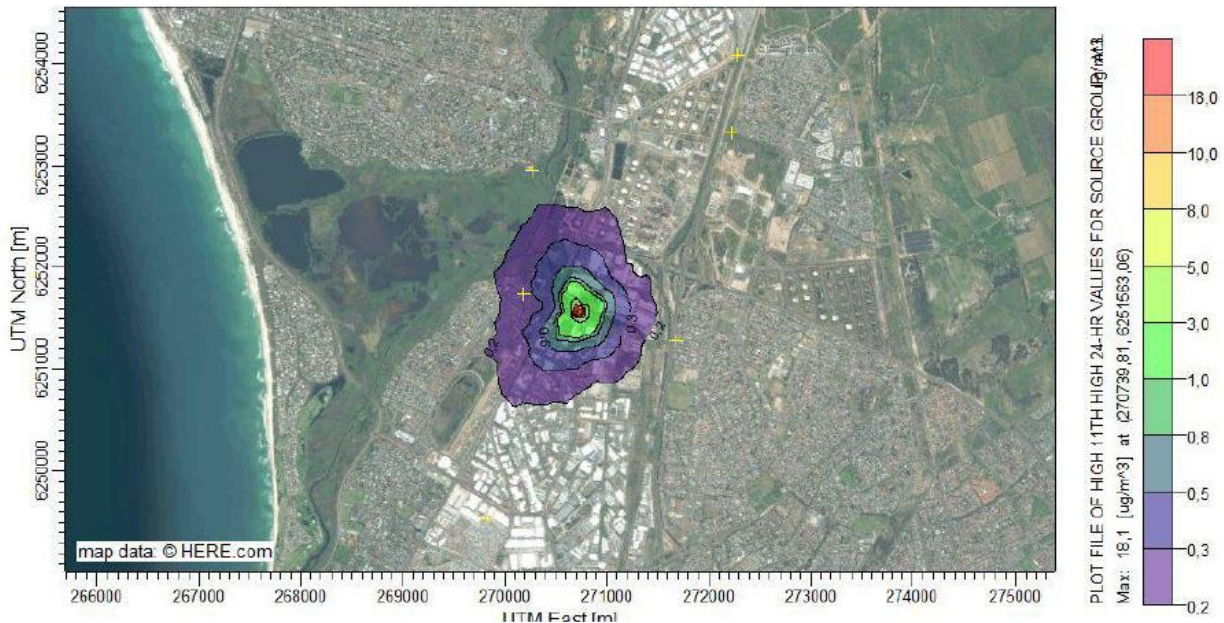


**Figure 2: Isopleths of Annual NO<sub>2</sub> Concentration Around the Proposed Crematorium (YellowTree, 2022).**

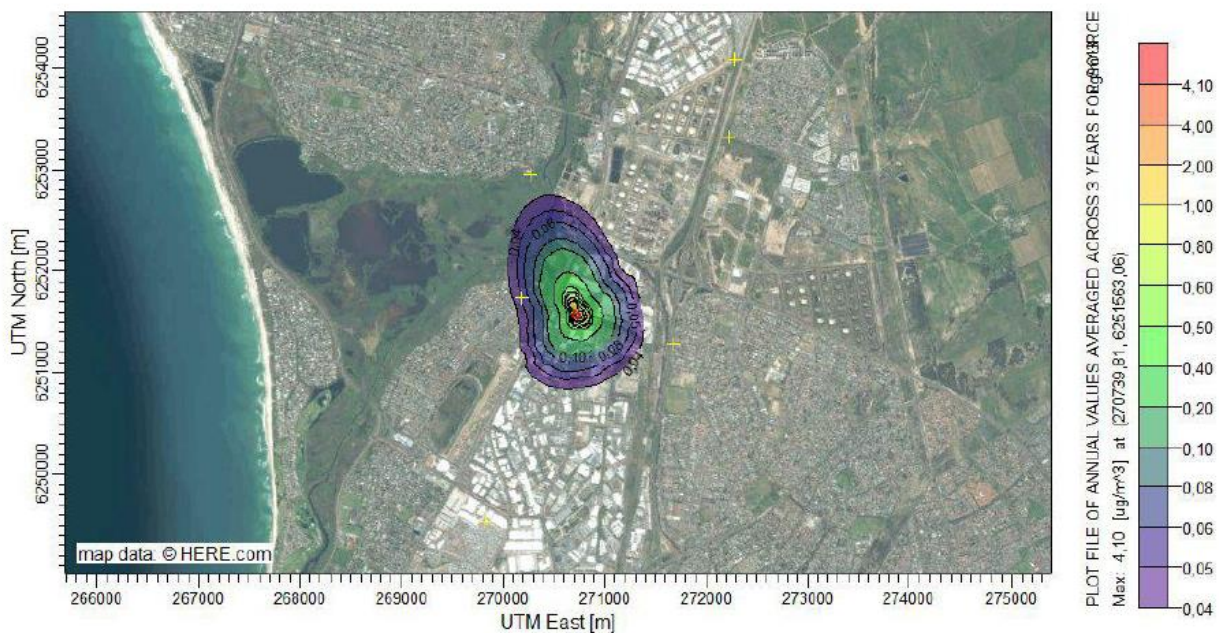
- When PM<sub>10</sub> data from the Edgemead monitoring station is used as a baseline, **the daily PM<sub>10</sub> concentrations are predicted to exceed the NAAQS standard at the facility's fence line. Again, it should be noted that the cumulative air quality impact of the facility is estimated by assuming that the maximum daily concentration will be experienced every day in the three-year period, which would not be the case in reality.**

**Table 3: PM<sub>10</sub> Results (YellowTree, 2022).**

Ave. Period	Parameter	Max Fence Line and Surrounds	Milnerton Ridge Sensitive Receptor	Bothasig Sensitive Receptor	Flamingo Vlei Sensitive Receptor	Richwood Sensitive Receptor	Dunoon Sensitive Receptor	Phoenix Sensitive Receptor
Daily	Conc. (µg/m <sup>3</sup> )	18.12408	0.26333	0.11884	0.12428	0.03783	0.03218	0.06409
	Location	X: 270739.81 Y: 6251563.06	X: 270178.66 Y: 6251740.48	X: 271676.99 Y: 6251279.85	X: 270263.33 Y: 6252948.25	X: 272217.76 Y: 6253325.42	X: 272287.48 Y: 6254074.39	X: 269820.54 Y: 6249534.94
	Elevation	11.32	7.61	24.80	4.83	30.78	36.35	17.95
	Date	2019-07-03	2020-05-07	2021-07-28	2019-06-14	2021-04-21	2019-10-03	2019-08-24
Annual	Conc. (µg/m <sup>3</sup> )	4.09635	0.04964	0.02201	0.03093	0.00555	0.00432	0.00865
	Location	X: 270739.81 Y: 6251563.06	X: 270178.66 Y: 6251740.48	X: 271676.99 Y: 6251279.85	X: 270263.33 Y: 6252948.25	X: 272217.76 Y: 6253325.42	X: 272287.48 Y: 6254074.39	X: 269820.54 Y: 6249534.94
	Elevation	11.32	7.61	24.80	4.83	30.78	36.35	17.95
	Date	-	-	-	-	-	-	-



**Figure 3: Isopleths of Daily PM10 Concentration Around the Proposed Crematorium (YellowTree, 2022).**



**Figure 4: Isopleths of Annual PM10 Concentration Around the Proposed Crematorium (YellowTree, 2022).**

- YellowTree further recommended that although the engineering specifications of the cremators indicate that the stacks are to be 12 metres high, the AERMOD model was run using stack heights of up to 20 metres. The optimum height was determined to be 16 metres, which resulted in no NAAQS exceedances at the fence line for PM<sub>10</sub> or NO<sub>2</sub>, unless these exceedances existed in the baseline data (i.e. daily PM<sub>10</sub> in 2021 using the Edgemoor baseline data). It was recommended that higher stack heights be considered by the proponent in order to minimise the effect of the proposed crematorium on ambient air quality.





**Figure 5: Estimated stack positions (YellowTree, 2022).**

The manufacturer of the BA2 cremators, Engineered Thermal Solutions, further indicated that testing and commissioning of the cremators is done in accordance with SANS329 (Industrial Thermo-Processing Equipment) and it conforms to SANS347 (Categorization and conformity assessment Criteria for all Pressure Equipment), indicating that adherence to these standards is required by SASOL and SAGA (South African Gas Association).

YellowTree will submit an Application for an Air Emissions License in accordance with NEM:AQA Section 37, to the licensing authority of the area (City of Cape Town). If the Air Emissions License is awarded, the proponent will need to comply with the AEL obtained from the CCT Air Quality Management Unit and the applicable monitoring and reporting requirements. **The Air Quality Specialist has advised that Annual emissions sampling from the chimney stacks for PM, CO, NO<sub>x</sub> and Hg is required as per GN 893 of 2013. More frequent emissions sampling can be specified in the AEL, if the licensing authority sees fit.**

Concerns were raised regarding CO<sub>2</sub> emissions, and the specialist provided this as a response: While it is noted that the cremation process will result in the formation of carbon dioxide, it is also important to note the following:

1. Carbon dioxide only has acute health impacts at extremely high concentrations, i.e. above 2 % (20 000 ppm). The carbon dioxide concentration in ambient air is approximately 0.04 % - i.e. well below the concentration at which any health effects will be experienced.
2. Life cycle assessments have shown that cremation actually has a lower overall environmental footprint than burial.
3. An air quality impact assessment was conducted to determine the effects of the proposed crematorium on air quality in the area. This study focussed on pollutants that have acute health

effects. In particular, particulate matter (PM), carbon monoxide, the oxides of nitrogen, and mercury, were studied.

### **2.3.1.2. Misconception that the Proposal Will Create Health Issues.**

A Final Rapid Appraisal Health Impact Assessment Report was compiled by Niara Environmental Consulting, and the author is Ms Vumile Ribeiro.

The Health Specialist has concluded the following:

- It is acknowledged that design and operations parameters play a significant role in ensuring reduced emissions caused by the cremating processes, as such we confirm that Johnson Thermal Engineering are the designers of the JTE BA1 and BA2 Cremator Machines, locally manufactured and distributed in South Africa by Engineered Thermal Systems (Pty) Ltd, which is the machinery that Platinum Pride intend to use in the proposed Platinum Pride Crematorium Project. **This machinery is expected to significantly reduce emissions and in turn reduces any health impact to the surrounding community which may occur due to the proposed Platinum Pride Crematorium Project.**
- The Management and control measure of odour emissions and contaminants in crematorium may be reduced and / or eliminated through installation of ventilators and exhaust fans, considering practical conditions, such that low concentration odour emissions can be promptly diluted and discharged. Furthermore, equipment will be operated in an intermittent working mode to reduce odour accumulation in the workshop associated with the workload.
- In addition, depending on proximity to other criteria air pollutant emission sources, some of the **pollutants of concern listed in this Report may already be present in ambient air at the point of impingement of the crematorium plume, contributing to exposure concentrations in excess of those estimated in the AQIA.** Individuals in the surrounding industrial area may also be exposed to, for example, elemental mercury through dermal contact with mercury present in soil, or through ingestion of contaminated food or water, for example. Crematorium installations should implement processes such as filters to reduce their atmospheric emissions to limit mercury emission. The effects of multiple sources of air pollution (considering that the proposed Crematorium is to be located in an existing industrial area, surrounded by several contributors to air pollution) and routes/ pathways of exposure (dermal, air, consumption etc.) should be considered in an assessment of individual risk associated with exposure to any perceived pollutants from the crematorium - people may also be exposed to the identified pollutants such as mercury for example, through dermal contact with mercury present in soil, or through ingestion of contaminated food or water, etc. Section 10.1 of the Specialist Report has discussed impacts these pollutants and their potential impacts to human health.
- The property is zoned as General Industry Zone 1 which permits a crematorium. It is of the opinion of the author that **the proposed Project poses negligible to no risk to human health.** The author does, however, recommend that the air quality emissions are monitored bi-annually upon operation of the crematorium and an analysis on those results should be conducted where a specific concern exists. To ensure that the proposed crematorium does not cause adverse health impacts to both the employees and the surrounding areas, the mitigation measure stipulated in the HIA and the air quality study should be implemented and the requirements stipulated in the National Health Act (Act 61 of 2003) should be adhered to.

The BAR however, will recommend that Air Quality Monitoring be undertaken in line with the Air quality specialists recommendation. More frequent emissions sampling can be specified in the AEL, if the licensing authority sees fit.

**General Health Concerns (considering all Crematoriums):**

- Noise

General Concern from Specialist	Specialist analysis of the Proposal	Technology Specifications
Potential health effects identified include hearing loss or loss of hearing sensitivity, sleep disturbance, cardiovascular and physiological effects, mental health effects and behavioural effects, including poor performance by school children (Stansfield and Matheson 2003, WHO 1999, Health Evidence Bulletins 1999)	According to the design of the furnaces, the Combustion Air Fan noise is attenuated and located on top of the Cremator roof. Thus the physical effect of hearing loss and impairment due to noise exposure is not a community health risk but is an important workplace occupational health consideration. The noise levels required to induce hearing loss only occur at levels above 85 dB(A) which would be intolerable for any community.	The manufacturer has assured that the attenuation specifications are sufficient to ensure that workers are not at risk.

- Air Quality

Cremation is a combustion process whereby a casket and human cadavers are incinerated at a high temperature in a closed chamber. Cremation is normally fuelled by gas and will produce emissions associated with fossil fuel combustion as well as emissions related to the material being combusted (Domingo, 2010). This can include:

- Combustion gases: carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), sulphur dioxide (SO<sub>2</sub>) and volatile organic compounds (VOC);
- Particulate matter and fine dust: PM<sub>10</sub> and PM<sub>2.5</sub>;
- Organic pollutants: Compounds resulting from incomplete combustion processes or formed when organic compounds react with chlorine in materials such as plastics. These pollutants can include polychlorinated dibenzo-p-dioxins (PCDDs) and dibenzofurans (PCDFs) and polycyclic aromatic hydrocarbons (PAH) amongst others;
- Heavy metals: Mercury (Hg) arising from volatilization of Hg in dental amalgam in fillings and a small quantity of various metals in tissues of the individual, or personal memorial items included in the casket.

The pollutants of most concern are those known to be toxic to humans and which can bioaccumulate in tissues (e.g., PCDD/Fs and Hg) as well as fine particulate matter (PM<sub>2.5</sub>), which can negatively impact the heart and lungs and is associated with some chronic illnesses and adverse birth outcomes (NCCEH, 2020). Evidence on the release of radioactive particles, following cremation of deceased patients who had been treated with radioactive substances (e.g., cancer treatments) has not been widely studied but has been raised as an emerging area of public interest and concern.

<b>Pollutant</b>	<b>Short-term exposure</b>	<b>Long-term exposure</b>
<b>Particulate matter (PM)</b>	<ul style="list-style-type: none"> <li>➤ Lung inflammatory reactions</li> <li>➤ Respiratory symptoms</li> <li>➤ Adverse effects on the cardiovascular system</li> <li>➤ Increase in medication usage</li> <li>➤ Increase in hospital admissions</li> <li>➤ Increase in mortality</li> </ul>	<ul style="list-style-type: none"> <li>➤ Increase in lower respiratory symptoms</li> <li>➤ Reduction in lung function in children</li> <li>➤ Increase in chronic obstructive pulmonary disease</li> <li>➤ Reduction in lung function in adults</li> <li>➤ Reduction in life expectancy</li> <li>➤ Reduction in lung function development</li> </ul>
<b>SO<sub>2</sub></b> - originates from the combustion of sulphur-containing fossil fuels in applications such as residential heating, industries, stationary power generation, ships and motor vehicles	<ul style="list-style-type: none"> <li>➤ Effects of SO<sub>2</sub> exposure are short-lived with lung function returning to normal within a few minutes to hours (WHO, 2000; WHO, 2005). The proposed development will utilize LPG which has far lower emissions than other fossil fuels</li> </ul>	<ul style="list-style-type: none"> <li>➤ An exacerbation of respiratory symptoms and a small reduction in lung function in children in some cases.</li> <li>➤ In adults, respiratory symptoms such as wheezing, and coughing are increased. The Hong Kong "intervention" study (Hedley, et al., 2002) indicated significant health benefits, both immediate and long-term, in reducing SO<sub>2</sub> from a daily average of 44 µg/m<sup>3</sup> to 21 µg/m<sup>3</sup></li> </ul>
<b>Nitric oxide (NO)</b> - is a primary pollutant emitted from combustion at stationary sources (heating, power generation, industrial incinerations) and from motor vehicles.	<ul style="list-style-type: none"> <li>➤ Decreases in pulmonary function.</li> <li>➤ Asthmatics are potentially the most sensitive subjects although various studies of the health effects on asthmatics have been inconclusive.</li> </ul>	<ul style="list-style-type: none"> <li>➤ No evidence is provided for the association of long-term exposures with health effects in adults (WHO, 2005).</li> </ul>
<b>Ozone</b> - in the atmosphere is a secondary pollutant formed through a complex series of photochemical reactions between NO <sub>2</sub> and VOCs in the presence of sunlight. Sources of these precursor pollutants include motor vehicles and industries.	<ul style="list-style-type: none"> <li>➤ Respiratory symptoms, pulmonary function changes, increased airway responsiveness and inflammation.</li> <li>➤ Ozone exposure has also been reported to be associated with increased hospital admissions for respiratory causes and exacerbation of asthma (WHO, 2005).</li> </ul>	<ul style="list-style-type: none"> <li>➤ There is limited information linking long-term O<sub>3</sub> exposure to chronic health effects, however, there are suggestions that cumulative O<sub>3</sub> exposures may be linked with increasing asthma severity and the possibility of increased risk of becoming asthmatic (Katsouyanni, 2003).</li> </ul>
<b>Carbon monoxide (CO)</b>	<ul style="list-style-type: none"> <li>➤ The adverse health effects of CO vary, depending on the concentration and time of exposure. Clinical symptoms</li> </ul>	

<p>- is one of the most common and widely distributed air pollutants. Anthropogenic emissions of CO originate from the incomplete combustion of carbonaceous materials. The largest proportion of these emissions is produced from exhausts of internal combustion engines, in particular petrol vehicles. Other sources include industrial processes, coal power plants and waste incinerators.</p>	<p>range from headaches, nausea and vomiting, muscular weakness, and shortness of breath at low concentrations (10 ppm) to loss of consciousness and death after prolonged exposure or after acute exposure to high CO concentrations (&gt;500 ppm).</p> <ul style="list-style-type: none"> <li>➤ Poisoning may cause both reversible, short-lasting neurological deficits and severe, often delayed, neurological damage. Neuro-behavioural effects include impaired co-ordination, tracking, driving ability, vigilance, and cognitive ability at carboxyhaemoglobin levels as low as 1.5 – 8.2% (WHO, 2005).</li> <li>➤ High risk patients with regards to CO exposure include persons with cardiovascular diseases (especially ischaemic heart disease), pregnant mothers and the foetus and new-born infants. Epidemiological and clinical studies indicate that CO from smoking and environmental or occupational exposures may contribute to cardiovascular mortality (WHO, 2005).</li> <li>➤</li> </ul>
<p><b>Benzene</b></p> <p>- is a volatile organic compound (VOC). Benzene is a natural component of crude oil, and petrol contains 1 – 5% by volume. Benzene is produced in large quantities from petroleum sources and is used in the chemical synthesis of ethyl benzene, phenol, cyclohexane, and other substituted aromatic hydrocarbons. Benzene is emitted from industrial sources as well as from combustion sources such as motor engines, wood combustion and stationary fossil fuel combustion. The major source is exhaust emissions and evaporation losses from motor vehicles and during the handling, distribution, and storage of petrol.</p>	<ul style="list-style-type: none"> <li>➤ Information on health effects from short-term exposure to benzene is fairly limited. The most significant adverse effects from prolonged exposure to benzene are haematotoxicity, genotoxicity and carcinogenicity. Chronic benzene exposure can result in bone marrow depression expressed as leukopenia, anaemia and/or thrombocytopenia, leading to pancytopenia and aplastic anaemia. Based on this evidence, C<sub>6</sub>H<sub>6</sub> is recognized to be a human and animal carcinogen. An increased mortality from leukemia has been demonstrated in workers occupationally exposed (WHO, 2005).</li> </ul>

As indicated in the Air Quality Assessment, the Ambient PM<sub>10</sub> (using the Table View baseline data), PM<sub>2.5</sub>, CO, mercury, and lead concentrations at the fence line of the site are predicted to remain in compliance with the NAAQS standards (and the international guideline for mercury) should the proposed crematorium be commissioned. The benzene concentration as a result of the proposed crematorium does not change the overall compliance status. Although CO<sub>2</sub> and PM prove to exceed the hourly NAAQS standard, CO<sub>2</sub> concentration rapidly decreases with distance from the site, and no NAAQS exceedances are predicted in any of the surrounding residential areas. It must also be noted that the cumulative air quality impact of the facility is estimated by assuming that the maximum hourly concentration will be experienced every hour of every day in the three-year period, which would not be the case in reality. The ambient annual NO<sub>2</sub> concentration at the fence line is predicted to comply with the annual NAAQS for NO<sub>2</sub>.

Based on the pollutant quantities that may create health issues (extracted from theoretical papers and studies from the HIA), when compared to the Air Quality findings, it was concluded that only PM may result in health concerns, if exceedances are experienced:

- Susceptible groups with pre-existing lung or heart disease, asthmatics, as well as elderly people and children, are particularly vulnerable.
- Short term exposure to PM (based on the daily predicted model result) at low concentrations of exposure below 100 µg/m<sup>3</sup> may include:
  - an increase in lower respiratory symptoms
  - medication use.
  - small reductions in lung function.

There are no annual exceedances. **The Health Assessment has concluded that the proposed project poses negligible to no risk to human health**, taking into consideration the air quality results and other factors. The Health Specialist further highlighted that they believe that the exceedances may be as a result of baseline data consisting of other existing pollutants in the surrounding area, and as noted by the Air Quality Specialist, the cumulative air quality impact of the facility is estimated by assuming that the maximum daily concentration will be experienced every day in the three-year period, which would not be the case in reality.

SO<sub>2</sub> originates from fossil fuels. The preferred fuel source for the development is LPG, which is known to have low carbon emissions and is recorded to emit small amounts of SO<sub>2</sub>.

As per Section B, point 4.4 of the BAR, the technology has proven to comply with the Air Emission Standards during operational phase.

• *Mercury*

<b>Pollutant</b>	<b>Short-term exposure</b>	<b>Long-term exposure</b>	<b>Potential Health Impact based on Predicted Quantities (extracted from the HIA)</b>
<b>Mercury</b> <ul style="list-style-type: none"> <li>- Mercury occurs in the environment as a result of natural processes</li> </ul>	➤ Acute exposure to high concentrations of elemental mercury vapour, such as workers who were exposed to 0.79 mg/m <sup>3</sup> for 1.5	➤ Due to the long-term low-dose exposure, crematoriums are sources of air pollution, particularly	Individuals in the surrounding industrial area may also be exposed to, for example, elemental mercury through dermal contact with



(e.g., volcanic outgassing) and human activities like mining and burning of fossil fuels	years, 0.9 mg/m <sup>3</sup> for over 5 years, and 0.014–0.076 mg/m <sup>3</sup> for over 15 years, or in cases that are exposed for a longer period such as in occupational settings, may be followed by chest pains, dyspnea, coughing, hemoptysis, and sometimes interstitial pneumonitis leading to death (Piagno & Afshari, 2020).	mercury emissions, which have the potential to have subtle, chronic health consequences. From a health standpoint, describing the type and intensity of the evidence of causation and dose-response evaluation are required	mercury present in soil, or through ingestion of contaminated food or water, for example.
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According to the Health Assessment, it has been found that mercury emissions from crematoriums account for an insignificant percentage of the total emissions in the atmosphere. A risk assessment revealed no evidence that ground-level exposure to elemental mercury vapour from crematoriums posed a serious danger to human health (Piagno & Afshari, 2020).

- *Health Impacts Associated with the Handling and Storage of Cadavers*

Pathogens – (such as HIV/Hepatitis)

Cadavers may pose hazards to those handling them. The recently dead may have been infected by a wide range of pathogens. Once the host is dead, most pathogenic microorganisms cease multiplying and die rapidly as a result of microbial competition as the body decomposes.

The risk of infection hazards of human cadavers can be greatly reduced by:

- Covering cuts or lesions with waterproof dressings;
- Careful cleansing of any injuries sustained during procedures;
- Wear single-use gloves and impervious single-use aprons;
- Take care not to contaminate their instruments or their working environment;
- Wash their hands carefully after touching the cadaver(s) and before eating, drinking, or smoking;
- Good personal hygiene; and
- Use of appropriate protective clothing

This has been included in the BAR. Despite this, it's key to note that the bodies will not be handled excessively, as this is not a funeral home.

Pathogens – (SARS-CoV-2 (COVID-19))

The normal route of transmission of SARS-CoV-2 is via respiratory droplets and aerosols, with the bronchial and conjunctival epithelia as the probable main points of entry. The virus can affect many organs of the body and persist for long periods in infected individuals. SARS-CoV-2 can remain viable on inanimate surfaces for up to nine days under laboratory conditions (CDC, 2020), but the

importance of such contamination as a source of infection remains unclear. With regards to preparation for burial or cremation of those who have died of SARS-CoV2 infection, the bereaved are advised to avoid rituals or practices that bring them into close contact with the deceased. If religious observance requires such contact (for example viewing, embalming, cosmetic enhancement or hygienic preparation) it should be limited to those who are wearing PPE, under the supervision of someone who is trained in the appropriate selection and use of PPE.

Guidance on the safe handling of those who have died with or from SARS-CoV-2 infection, including full autopsy procedures and the collection of specimens from cadavers, is available from several national and international sources and those dealing with such individuals are advised to follow the guidelines most relevant to their location.

It's key to note that the bodies will not be handled excessively, as this is not a funeral home/morgue and the bodies will be prepared prior to cremation.

- *Odour*

The Health Specialist report confirmed that odour is not expected to be a considerable nuisance for the proposed crematorium. Research shows that in a modern effectively functioning crematorium, after it all, there is nothing left to smell resulting in little to no odour. The heat is high enough that everything that can be reduced to smoke is done. Considering that smoke is minute particles carried on hot gasses, even these particles are burned until they are almost completely broken down. There is hardly anything left to smell. In most cases, cremated remains are odourless. They may have a slightly metallic odour or some people say they smell somewhat like incense in some cases. However, it is common for ashes to have no distinct smell. Nonetheless, they can take on the smell of the container or cremation urn they are in. As per the manufacturers guarantee the technology is designed to be odourless. Therefore, there is **no risk of odour** for the employees or surrounding community.

### **Mitigation**

According to the Specialists Report, the best available techniques to avoid crematorium associated air pollution are those that consider both technology and management. Control of persistent organic pollutants would comprise the following items and considerations (UNEP, 2008):

<b>Items and Considerations to Control Persistent Organic Pollutants</b>	<b>Compliance</b>
A cremator meeting the minimum temperature, residence time and oxygen requirements and demonstrated to meet those requirements;	See Appendix L for technology details and compliance.
Suitable air pollution control equipment (for control of persistent organic pollutants this would need to include temperature management to control residence time in reformation window, carbon injection and fabric filtration or equivalent) along with culturally and environmentally appropriate burying of any collected material;	
Combustion chambers and casings should be made as airtight as possible and operate under reduced pressure to minimize release of furnace gases;	
Gas temperatures should be monitored to allow control systems to maintain minimum temperature criteria (through use of support fuel	

burners) and provide interlocking to stop charge when temperature falls below minimum;	
Flue gas oxygen and carbon monoxide levels should be monitored and linked to the control system to ensure adequate control of air supplies and address any combustion problems;	
Mechanized loading and handling of coffins to minimize exposure to operators;	
Coffin storage facilities to be refrigerated, lockable and rodent and bird proof and have odour control;	3 x reefer coolers are to be included in the proposed upgrade as per the scope of works.
Coffin and coffin fittings should be made of combustible material. Avoid use, or inclusion, of articles containing PVC, metals and other chlorinated compounds;	The proponent has confirmed that alternative coffin materials will be encouraged, such as cardboard coffins, etc. however ultimately this is the choice of the family of the deceased.
Effective operation control, inspection and preventive maintenance of components whose failure could impact on the environment by releasing persistent organic pollutants;	See Appendix L for monitoring system of technology. Monitoring of air quality emissions is a recommendation, as well as compliance with all other relevant regulations.
Operator competencies to be identified and met by suitable training;	Training is provided by the manufacturer.
Application of emission limit values and monitoring of emissions to demonstrate emission compliance for persistent organic pollutants.	Monitoring has been recommended.
Best available techniques for other pollutants have not been considered and it should be recognized that other factors will also impact on the definition of best available techniques for a facility (e.g. water and energy use considerations).	The proposed technology will utilize LPG and will not require water.

- Mitigation for Workers in the Crematorium

According to Cui et al., (2021) cremators, incinerators, and post-processing devices are all installed in cremation workshops and operated indoors. Consequently, a large quantity of unorganized odour emissions accumulates inside the workshop and impact the health of the workshop staff. Several studies have highlighted the potential risks of inhaling radioactive ashes by crematorium staff or members of the public. Due to the prolonged half-life of some radioisotopes, if the patient dies soon after implantation, then the cremated remains would also remain radioactive (Smith et al., 2012). This causes a hazard to the staff and those who handle the remains, until placed into a metal urn. Pacemakers and expandable orthopaedic nails are also two potential dangers to cremation staff. Studies conducted by Korczynski (1997) and Maloney et al., (1998) exposure to Hg to be higher amongst crematoria staff than in a control population, and exposure to fine particulates may occur, particularly where there are no operational and engineering controls to reduce exposure to dust.

The manufacturer has confirmed that the technology is odourless and smokeless, and removal of the ash tray is undertaken using cleaning tools that minimize the potential for dispersion. It is a recommendation of the BAR and EMPr that employees utilize masks when removing/handling the ash trays.

General mitigation measures recommended:

- Assessing and ensuring hygiene is maintained in line with funeral parlour legislation, regulations relating to the management of human remains, Government Notice No. 363 of 22 May 2013 - Condition of the Environmental Authorization.
- Training: Staff at all levels need the necessary training and instruction in their duties relating to control of the process and emissions to air. In order to minimise risk of emissions, particular emphasis should be given to control procedures during start-up, shut down and abnormal conditions.
- Maintenance: Effective preventative maintenance plays a key part in achieving compliance with emission limits and other provisions. All aspects of the process including all plant, buildings and the equipment concerned with the control of emissions to air should be properly maintained.
- Bi-annual air quality monitoring for the first year of operations, then annually for the rest of the duration of the operational phase of the Project.
- Air quality monitoring should be conducted by appropriately trained operating staff.
- Exhaust flow rates should be installed. These should be consistent with efficient capture of emissions, good operating practice and meeting the requirements of the legislation relating to the workplace environment.
- Minimum furnace temperature (850 °C), residence time in the second chamber (2 seconds for combustion gases) and enough air to ensure combustion in the second chamber and avoid generating products of incomplete combustion.
- Suitable air pollution control equipment, which could include temperature controls, dust control, carbon injection, fabric filtration, air tightness of combustion chambers and casings.
- Monitoring of gas temperature and flue gas O<sub>2</sub> and CO concentrations, application of relevant emission limit values and additional monitoring, including ambient air quality monitoring in the proximity of crematoria.
- The presence of PVC, metals and other contaminants (particularly chlorine compounds) in the coffin material and furnishings should be avoided to reduce the generation of persistent organic.
- Use of waste-derived or other fuels potentially contaminated with persistent organic pollutants should be minimized.
- Operational controls, inspection and preventive maintenance.
- Sealed furnaces are essential to contain fugitive emissions while permitting heat recovery and collecting off-gases for abatement or discharge.
- Particulate matter should be removed to reduce PCDD/PCDF emissions to atmosphere.
- All crematorium staff involved in such a case should wear a mask and rubber gloves when handling the cremated materials, all cremated remains should be put in a metal urn, any unwanted radionuclides should decay in storage for 20 months before being discarded and remains should not be scattered until 20 months after the date of implantation.
- Other good practice measures to protect crematoria workers, such as removal of radioactive implants before cremation, informing crematoria workers of recent radiotherapy treatments for deceased patients, and safe handling practices for ashes, can also reduce possible environmental releases of pollutants.

- Carbon dioxide emissions from gas usage are the main greenhouse gas component of a crematoria's carbon footprint. The applicant may wish to note that the development of an energy reduction strategy will have the benefits of saving money and reducing their carbon footprint. A measure as simple as recording of gas consumption (e.g., comparison of quarterly gas bills) is a first step in managing energy use and therefore CO<sub>2</sub> emissions.

**Table 4: As extracted from the Specialist Health Assessment, Table 11 1: Measures for pollutants of most concern from crematoria emissions (O'Keeffe, 2020)**

Control Measure(s)	Pollutants			
	PCDD/Fs	Hg	PM <sub>2.5</sub>	Radioactivity
<b>Source Control</b>				
Removal of plastics	*		*	
Non-toxic and eco-friendly coatings or materials in caskets	*			
Removal of Hg fillings		*		
Removal of medical devices containing radioactive material				*
<b>Operational Control</b>				
Minimum 850°C (2 <sup>nd</sup> chamber)	*		*	
Minimum residence time of 2 s (2 <sup>nd</sup> chamber)	*		*	
Adequate O <sub>2</sub> in combustion chamber	*		*	
Monitoring CO releases	*		*	
Air tightness of combustion chambers and casings	*	*	*	*
Maintenance	*	*	*	*
Operator training	*	*	*	*
<b>Emission controls</b>				
Dust control (filters and scrubbers)	*		*	
Activated carbon treatment	*	*		
Hg removal technology (binding, precipitation etc.)		*		
Adequate chimney height	General dispersion and dilution of pollutants higher into atmosphere			

The table above indicates the measure which can help reduce emissions and may be employed in order to monitor the various control on the key pollutants associated with the crematorium.

For comprehensive management and control of unorganized odour emissions in workshops, workshop ventilation should be improved, and exhaust fans should be installed considering practical conditions, such that low-concentration unorganized odour emissions can be promptly diluted and discharged. Additionally, equipment should be operated in an intermittent working mode to reduce odour accumulation in the workshop associated with the workload.

The following table provides a summary of the best available techniques that can be used to control the cremation process (as provided by the specialist report):

Release	Substance	Control techniques	Technology compliance
Flue gas	Nitrogen oxides	No control	Technology has taken this into consideration, and has been designed accordingly. See Appendix L.
	Odour	Good combustion and a secondary combustion	
	Carbon monoxide	Good combustion and a secondary combustion	
	Volatile organic compounds	Good combustion and a secondary combustion	
	PAH	Good combustion and a secondary combustion	
	Mercury and its compounds	Abatement, or contribute via burden sharing scheme	
	Particulate matter	Good combustion, slow gas velocities and a secondary combustion zone. Abatement further minimises emissions*	
	Hydrogen chloride	Minimise halogens combusted, avoid excessive temperature in primary chamber. Abatement further minimises emissions*	
	PCDD/F	Minimise chlorine combusted and particulate matter emitted, good combustion and a secondary combustion zone, Abatement further minimises emissions*	
	Carbon dioxide	Measure gas consumption, good cremator design	

Release	Substance	Control techniques	Technology compliance
Cremated remains size reduction machine	Particulate matter	Filter on machine or external dispersion and filter if needed.	Ash is removed from ash tray, with cleaning tools, with minimal dispersion.
Spent gas-cleaning materials	Particulate matter, mercury	Keep containers tightly lidded	This will be included in the mitigation measures.
* if fitted for mercury abatement purposes			

It should be noted that the technology allows for constant monitoring of readings, etc. While it cannot be recorded (in this proposal the technology can be upgraded at an additional cost to record the details of each cremation, however this is not a feature as per the proponents agreement). The manufacturer has confirmed that the technology is functioning without the relevant abatement measures and is still complying with the Air Emission Standards because of the way it is designed. The mitigation measures have been included in the BAR and EMP, should they be necessary in the future.

#### 2.3.1.3. Concerns Related to Odour & Smoke Affecting Neighbouring Properties.

The manufacturer has confirmed that the technology is odourless and smokeless, without any additional abatement measures. Below are images, extracted from the evidence supplied by the manufacturer, depicting the chimney stacks at a site where the JTE BA2 Cremator was operational.



**Figure 6: Images above showing the secondary chamber temperature rising progressively from 555 °C to 576 °C, while the first chamber temperature is stable. Figure 7 shows the emissions at this point.**



**Figure 7: No visible emissions are released from the chimney stacks at the point of a primary chamber temperature of 565 °C and the secondary chamber temperature of 576 °C. The process of cremation has not started at this point.**

As advised by the manufacturers (Appendix L of the BAR), the BA2 Cremator Machines are configured to only start the cremation process if the secondary chamber is above 600 °C in temperature. This ensures that during the cremation process the secondary chamber temperature will rapidly rise to control at 850 °C or higher to result in complete combustion of the gases and odours before exiting the cremator stack. Below are images of what is emitted during the cremation process.





**Figure 8: The primary temperature remains at 562 °C, while the secondary temperature progresses from 815 °C to 818 °C.**



**Figure 9: No visible emissions can be seen at a primary temperature of 562 °C and secondary temperature of 818 °C.**

The secondary chamber of the JTE BA2 Cremator Machines is designed with sufficient volume to provide 2 seconds of high temperature exhaust gas residence time, to ensure low carbon monoxide emissions and total combustion of complex volatile organic compounds. Therefore, as per the manufacturers guarantee no emissions are visible, therefore there is no smoke emitted during a standard cremation.

The Health Assessment Report has advised that "odour is not expected to be a considerable nuisance for the proposed crematorium. Research shows that in a modern effectively functioning crematorium, after it all, there is nothing left to smell -little to no odour. The heat is high enough that everything that can be reduced to smoke is done. Considering that smoke is minute particles carried on hot gasses, even these particles are burned until they are almost completely broken down. There is hardly anything left to smell."

The Air Quality specialist advised the following, when addressing the smoke concerns: An air quality impact assessment that involved air dispersion modelling showed that the proposed crematorium would result in a limited impact on air quality in the area. In particular, PM (i.e. smoke) concentrations were predicted to be below the ambient air quality standards.

Given the manufacturers guarantee and the specialists findings, it is anticipated that there would not be any smoke affecting the adjacent properties, or surrounding community.

### **2.3.2.Socio-Economic Concerns**

#### **2.3.2.1. Negative Perceptions of Crematoriums**

It is acknowledged that there is a stigma related to crematoriums. The public has raised concerns based on their perception of what a crematorium is, its purpose, and potential impacts including air emissions, odours, health impacts, and visual impacts related to corpses or other funeral paraphernalia. Air quality, odour and health impacts have been addressed as per Section 2.3.1. of this report.

The public's perceptions of crematoriums are associated with stored corpses, caskets, incineration of corpses, hazardous fumes and odours, etc. which creates an emotive response, when people consider being in close proximity to such a facility. The proposal is aimed at providing a much needed service, during a difficult time in a person's life, and in most cases occurs unexpectedly. The BAR has been compiled to acknowledge and address this fact. Negative perceptions are addressed in Section G, Point 8 - Socio/Economic Aspects of the DBAR, by reminding people of why crematoriums are necessary, this includes:

- Cremations are the widely accepted end of life choice in some cultures.
- Funeral homes are sometimes confused with crematoriums. These facilities provide two separate services. Funeral homes are facilities that prepare bodies for cremation or burial, and/or for viewing, and can sometimes hold funeral services on the premises. Crematoriums do not excessively handle bodies, bodies are not stored for extended periods of time, bodies are delivered, stored temporarily (if necessary), and are then cremated, thereafter the ashes are distributed to the loved ones of the deceased. Therefore, there is no long-term storage encouraged at crematoriums, funerals are not permitted to be held on site, and public access on the site will be limited.
- Other forms of disposal of human remains includes cemeteries, which, as advised by City of Cape Town's Recreations and Parks Department: Cemetery Management Branch (see the accompany Comments and Responses Table), the City of Cape Town is facing critical grave shortages in local municipal cemeteries. Furthermore, from a socio-economic perspective, cemeteries are not sustainable in the long-term, as they can occupy vast amounts of land, that could be utilized for other essential land uses, that can result in economic benefits, while a crematorium is one facility (in this case positioned on disturbed and transformed land), that can be utilized for a long time if maintained efficiently. In addition, cemetery land has very little use once full, while a crematorium can be decommissioned, and the facility altered for another use. From an environmental perspective, cemeteries have the potential to contaminate ground water and soil if conditions are not ideal or are altered and if implementation is undertaken negligently.

Negative perceptions have been addressed in the Mitigation Tables of the DBAR as per Section H, and transferred into the EMP, as per the Sense of Place and Visual Impacts.

- Visual:
  - Screening of off-loading site.
  - Prohibiting storage of funeral paraphernalia outside the facility (including coffins, waste, etc.), in view of Stella Road or the neighbouring properties.

- Potted trees/plants purchased locally will be established along the interface of Stella Road and the site, creating a natural screen, in order to obscure the view of the site as well as to improve upon the natural aesthetic of the site.
- The proponent shall ensure that the ECO is involved in selecting the appropriate potted vegetation.
- The proponent shall be responsible for the maintenance of this screen and should not allow encroachment onto public properties.
- If the facility is to be painted, only natural colours, aligning with the surrounding developments, will be utilized where necessary.
- Non-descript vehicles will be utilized to transport human remains to the site, no hearses will be utilized by the proponent.
- The proponent will minimize the use of signage, indicating the presence of a crematorium.
- Social Initiative:
  - The proponent will join the local community group, allowing for open communication between the proponent and surrounding landowners/occupiers.
  - The proponent will make the air emissions reports available, to any interested party on written request.
  - The proponent will allow any interested party to raise any concerns or enquiries during operational phase.

The proponent commits to:

- Comply with all mitigation measures and conditions recommended in the Final EMPr, as and when applicable.
- Comply with all the conditions of the Environmental Authorization, and any other relevant permits.
- Will appoint an appropriately experienced service provider, to undertake the necessary risk assessment, to establish the need for a Major Hazard Installation.
- Appoint an appropriately experienced service provider to undertake the recommended air emissions monitoring in line with the Air Emissions License. These reports will be released to any person who wishes to view them, on written request, and may not be shared with a third party unless approved by the proponent.
- Appoint only skilled and experienced staff to conduct the required functions during operations.
- Will encourage the use of cardboard coffins amongst clients.

As additional mitigation, the BAR and EMPr, have included that metal hinges etc., be removed before cremation (to be encouraged by the proponent).

While people's perceptions are difficult to change, and perceptions around crematoriums are negative, it should be noted that the process of cremation has advanced significantly from outdoor wood pyres, exuding vast amounts of emissions in an uncontrolled environment. This crematorium facility will adopt technology specifically designed to reach the required temperatures at an efficient rate, significantly reduce harmful emissions and eliminate odour, in order to meet the Air Emission requirements for new plants as specified by the National Environmental Management: Air Quality Act (NEM:AQA). The manufacturer has supplied a guarantee to this effect and have a proven track record of success in other provinces. Furthermore, the adoption of LPG would reduce the dependence on Eskom infrastructure, reducing the demand from the previous landowners usage of the site, and will be a significantly lower emitter of carbon dioxide than other petroleum-based fuels.

**2.3.2.2.      *Loss of business and existing or potential tenants as a result of the establishment of a crematorium within close proximity.***

There is no evidence that the establishment of a crematorium will result in the loss of business or will cause tenants to leave the existing premises. If existing occupiers choose to do so, this would be based on their perception rather than any actual health or air quality impacts. Perception has been addressed as per section 2.3.2.1.

Like the existing crematoriums in Durbanville and Maitland, development has continued in the surrounding area, and as depicted in Section 2.3.3.4, the surrounding businesses within 500m radius, are very similar to those surrounding the Montague Gardens site, including food handling businesses, etc.

Furthermore, the surrounding area is zoned for industrial use. Property in industrial areas is expensive and sought-after because of multiple factors, including but not limited to, available amenities and services, permitted activities that would result in significant noise and potential hazards/risk, (eg; businesses that require daily movement of trucks, hazardous materials being utilized, etc.), competition amongst similar businesses as these are popular locations, while still being conveniently and centrally located. In addition, these businesses attract support businesses, such as take-aways etc.

Having a crematorium present does not diminish the attraction of such an area, as industrial zones are zoned to accommodate for risk industry, and for activities that may result in emissions from manufacturing activities etc. The EAP has indicated in Section 2.3.2.1. that additional mitigation will be included to significantly reduce the perception related to the impacts of the proposed crematorium.

**2.3.2.3.      *Cultural Concerns***

It is acknowledged that in some cultures cremations are not seen as the preferred form of disposal of human remains, while in other cultures it is recognized as the main form of disposal. The City of Cape Town has a diverse population, residing in various areas, and there are existing facilities which means this means of disposal is acceptable and utilized. According to the City of Cape Town website there are approximately 38 cemeteries, whereas there are only 2 functioning crematoriums. The City of Cape Town Parks and Recreation Branch has highlighted the City of Cape Town is facing critical grave shortages in local municipal Cemeteries, resulting in additional costs to families, therefore, they have encouraged the creation of additional crematorium facilities, as cremated remains may be added to full family graves, thereby reusing existing graves locally.

Industrial areas are zoned as such that they permit activities that can be high risk, that would not be permitted in close proximity to or within a residential area. This is predominantly a working environment, no person is residing within the area. Companies may not be permanent in the area, and while employees are entitled to a healthy working environment, industrial areas are zoned as such to accommodate land uses that may be associated with noxious emissions and risk related infrastructure, which is the case even before the crematorium has been established. Furthermore, this development will adopt technology that aims to comply with air emissions standards, and the site will undergo on-going monitoring, particularly in terms of air emissions.

#### **2.3.2.4. Not Undertaking Socio-Economic Assessment.**

The proposed site is appropriately zoned, for industrial use, as confirmed by the City of Cape Town. ERF 2433 is located near a Risk zoned tank farm to the north of the site, which already has exclusion zones/buffers around it. In addition, there are numerous other Major hazardous installations in Montague Gardens. Further to this, as required of the crematorium facility, in line with the Regulations Relating to the Management of Human Remains R363 of 2013, promulgated in terms of the National Health Act 61 of 2003, the proposed facility is located more than 500m from any habitable dwelling.

According to the National Department of Environmental Affairs (2017) and the Western Cape Department of Environmental Affairs and Development Planning's (2011) environmental impact assessment Guidelines on Need and Desirability a proposed development must be aligned with the current planning framework of the credible municipal Integrated Development Plan (IDP) and the Spatial Development Framework (SDF).

According to the City of Cape Town IDP and SDF development proposals should provide an adequate and equitable distribution of social facilities which includes the provision of cemetery space to meet increasing burial demand (CCT, 2017:99 & 2018:106). The Cape Town SDF policy guidelines further emphasise that "addressing burial demand" requires "encouraging alternatives to in-ground burial" (CCT, 2018:106). Crematorium facilities represent such an alternative. In accordance with the Cape Town Zoning Scheme Regulation (CCT, 2012), the proposed site is currently zoned for General Industrial activities which include 'funeral parlour' and 'crematorium' facilities.

Further to this The City of Cape Town Parks and Recreations Branch has highlighted the City of Cape Town is facing critical grave shortages in local municipal Cemeteries, resulting in additional costs to families, therefore, they have encouraged the creation of additional crematorium facilities.

#### **2.3.2.5. Concerns Related to Noise**

The manufacturer has confirmed that the fan is insulated to reduce noise, and the combustion air fan is noise attenuated and located on top of the Cremator roof. Based on this the Health Specialist has confirmed that the physical effect of hearing loss and impairment due to noise exposure is not a community health risk but is an important workplace occupational health consideration.

No noise complaints have been noted from the other sites in which the cremators are positioned. And mitigation has been integrated into the BAR and EMPr.

### **2.3.3. Technical Concerns**

#### **2.3.3.1. Technology Concerns**

The cremators to be utilized are BA2 Cremators and are sourced from distributors, Engineered Thermal Systems (Pty) Ltd, and are manufactured under a license from Johnson Thermal Engineering (JTE) (see Appendix L). The manufacturer has provided information as proof (Appendix L) including a guarantee that they have authorised to be shared. However, the proprietary information cannot be shared to the public.

The JTE Cremator design has the following benefits:

- The design has been around for more than a decade.
- Proven track record of successful operation that meets the Air Emission requirements for new plants as specified by the National Environmental Management: Air Quality Act (NEM:AQA).

**Table 5: Average Emissions from an Operating JTE Cremator at an Existing Crematorium Site (2021)**

Pollutant Name	Symbol	Normal	Emission Rate	Limits mg/Nm <sup>3</sup>
		mg/Nm <sup>3</sup>	Kg/hr	New Plant
Particulate Matter	PM	17.36	0.02	40
Carbon Monoxide	CO	62.40	0.06	75
Oxides of Nitrogen Expressed as NO <sub>2</sub>	NO <sub>x</sub>	243.56	0.23	500
Mercury	Hg	0.003	3 x 10 <sup>-6</sup>	0.05

*All Emission values are being reported under normal conditions of 273 K, 101.3 kPa and referenced to 11% O<sub>2</sub> as per NEM:AQA Section 21 List of Activities: Category 8, Subcategory 8.2: Cremation of Human Remains, Companion Animals (Pets) and the Incineration of Veterinary Waste.*

Table 5 depicts the emissions (Normal mg/Nm<sup>3</sup>) recorded during monitoring, at an existing site containing the JTE Cremator, as compared to the New Plant Standards in terms of NEM:AQA (Limits mg/Nm<sup>3</sup>). It is clear that the emissions are below the recommended limits and are therefore compliant with the New Plant Standards. It is recognized that this outcome is influenced by the way the furnaces are operated and managed. However, this is a clear indicator that if operated and managed, as will be enforced through the adoption of the EMPr, according to the operating manual and specifications, the technology is designed to be compliant in terms of NEM:AQA.

- Design, manufacturing, testing and commissioning is done in accordance with SANS329 (Industrial Thermo-Processing Equipment) and conforms to SANS347 (Categorization and conformity assessment Criteria for all Pressure Equipment). Adherence to these Standards is required by SASOL and SAGA (South African Gas Association) of which Engineered Thermal Systems is a proud member of.

Details provided on the BA2 cremators:

- Locally manufactured and distributed in South Africa, therefore easier and faster maintenance than imported machinery.
- Accommodates two chambers:
  - Chamber 1:
    - starved combustion primary chamber cremator, ensuring gas velocities are reduced, resulting in lower particulate pickup.
  - Chamber 2:
    - cremation process begins, from 600°C rapidly rising to control at 850°C or higher to completely combust gases and odours before exiting the stack.
  - Provides 2 seconds of high temperature exhaust gas residence time, to ensuring low carbon monoxide emission and total combustion of complex volatile organic compounds.
  - Cremators are equipped with an ejector in base of the cremator stack to aid with the drafting to maintain a slight negative pressure within the primary chamber, to ensure that no gases or noxious fumes are emitted into the cremator machine room when the door is opened; designed to meet the Air Emission requirements for new plants as specified in NEM:AQA.

Cremator set-up has the following benefits:

- All controls arranged for ease of access at maintenance time.
- If managed and operated as per specifications, maintenance is not required for up-to 5 years, minimum.
- Equipment is registered with the Safe Gas Equipment Scheme, per SANS requirement.
- The Combustion Air Fan is noise attenuated and located on top of the Cremator roof.
- There is a main shut-off isolation solenoid valve in case of emergencies.
- Contains a primary burner and secondary burner, to optimize incineration process.
- Actuators are accessible so as to control the air supply to the burner and secondary chamber.
- The hydraulic power is also accessible from the rear of the furnace.
- Cremator doors are controlled by two hydraulic cylinders to open and close doors, which also ensures an airtight seal by locking the Cremator door in a door surround seal during the Cremation process.
- The electrical/instrumentation box with PLC and fan VFD is located above the hydraulic power pack.
- The system has an HMI (touchscreen) at the front of the Cremator communicates with the PLC and the HMI affords the Operator full control of the Cremator. Unfortunately, the PLC does not record temperatures etc. however, the system can be upgraded to include this at an additional cost.
- Cremators have ash tray at the front of the cremator for easy removal, with relevant cleaning tools for minimal dispersion of ash.

#### **2.3.3.2. Concerns Raised Regarding Decommissioning of the Existing Manufacturing Facility.**

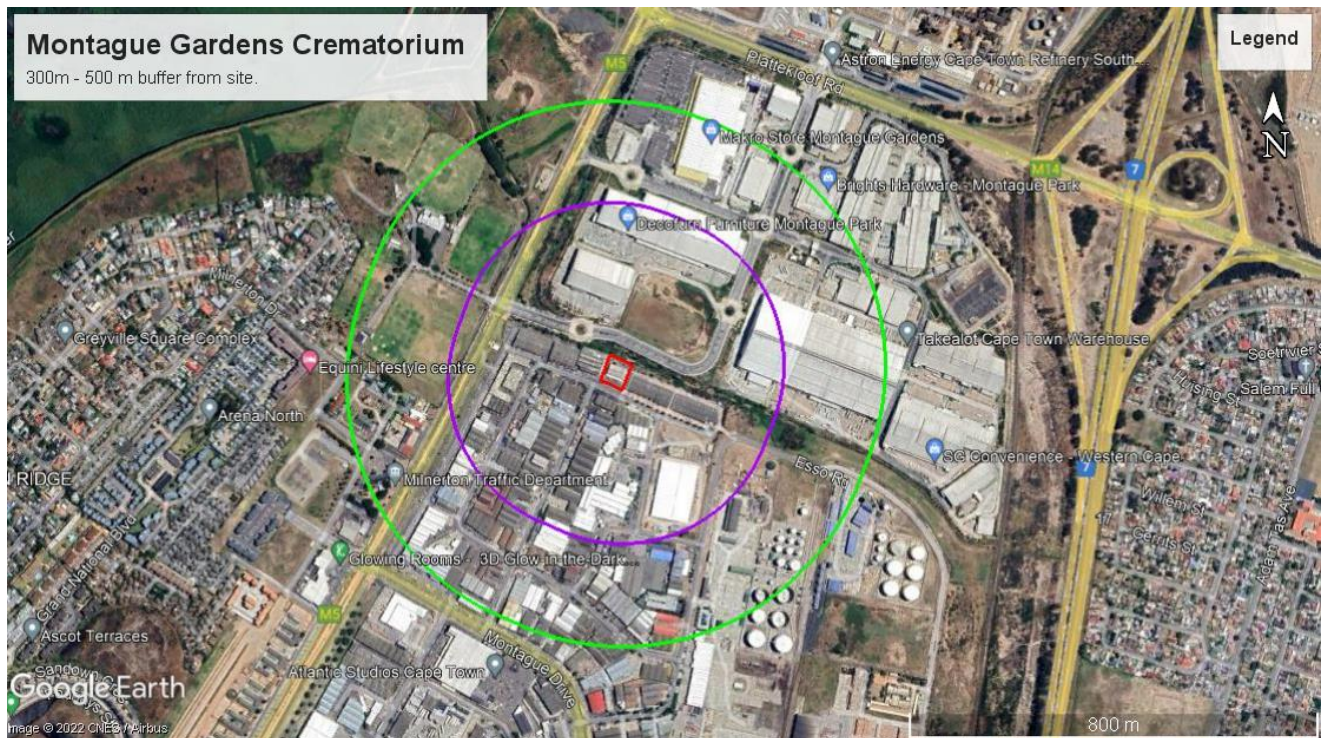
The manufacturing facility was owned by the previous landowner Crous Chemicals. The proponent is renting the property from the current landowner, and the decommissioning of the facility, with regard to any relevant permit/licenses/authorizations, should have been the responsibility of Crous Chemicals.

Waste management has been addressed during construction/establishment phase, as per the mitigation tables of the EMPr and BAR.

#### **2.3.3.3. Concern related to the 500m Radius to Habitable Dwellings and 300m from a Residential Area (as indicated by the Air Quality Report)**

The proposed site is located in the Montague Gardens industrial area, as per Figure 10, the purple polygon indicates the 300m buffer, and the 500m buffer is indicated by the green polygon.



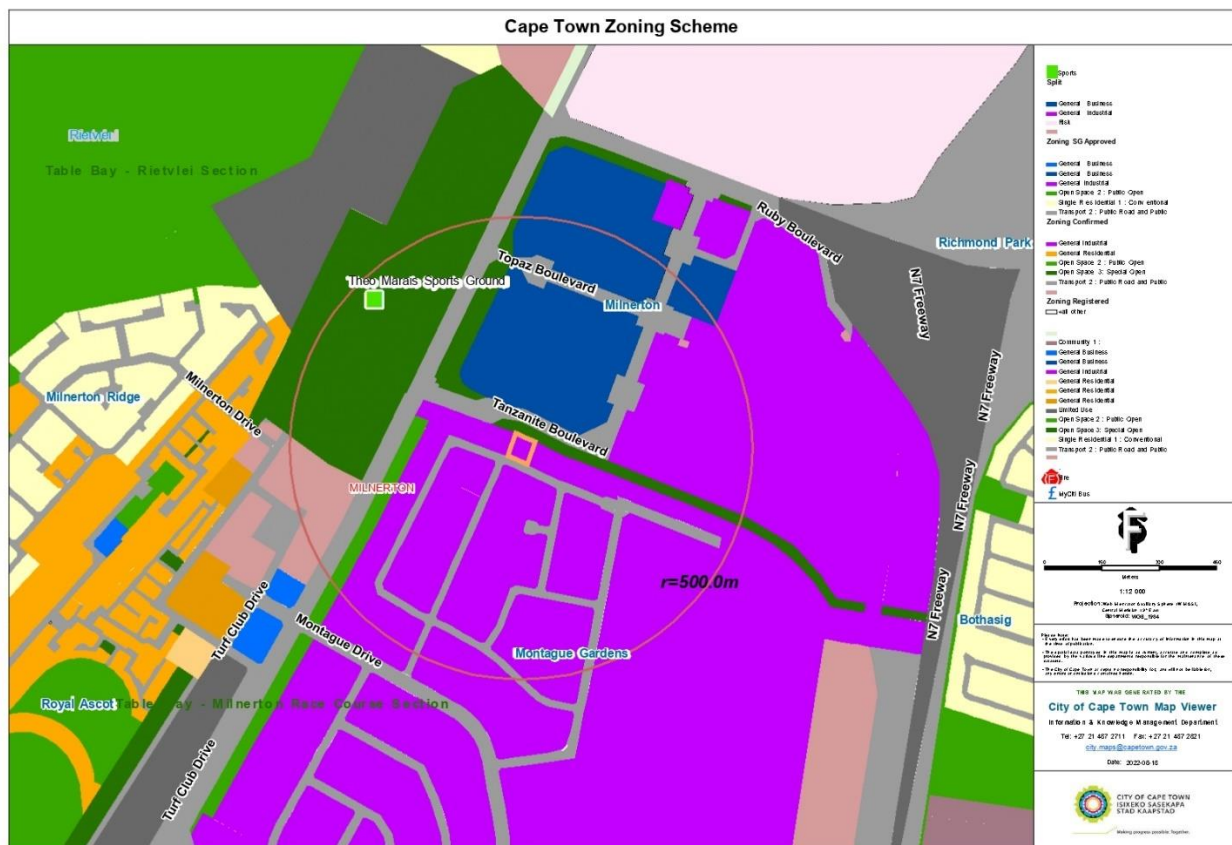


**Figure 10: 300m and 500m buffer radius from the proposed site.**

The Milnerton Residential Area was mistakenly indicated to be 300m to the East by the Air Quality Specialist, who has rectified this. The 300m buffer overlaps the Theo Marais Sport Complex grounds, and Koeberg Road, the Theo Marais Sport Complex may fall within Milnerton Residential Area (as indicated by the specialist), however these cannot be considered habitable dwellings and are actually zoned as open space.

'Habitable dwelling' is a term used as per The National Health Act, 2003 (Act No 61 of 2003), Regulations Relating to the Management of Human Remains, May 2013, Chapter 6, point 18 – Minimum requirements for a cremation facility. Western Cape Department of Health was included as an I&AP however no comment was provided.

A clarification session was conducted on the 29<sup>th</sup> of August 2022, where City of Cape Town's Air Quality Department indicated that they would define habitable dwellings as any residential area where people stay and sleep, not where people work or occupy business or industrial areas. Further to this the City of Cape Town indicated that the Fire Station located to south-west of the site is zoned as a utility zone and does not appear to be residentially zoned. A utility zone does not permit housing/accommodation, in line with the City of Cape Town's City of Cape Town Development Management Scheme (DMS).



**Figure 11: Zoning map depicting the 500m radius from the proposed property.**

The Western Cape Department of Health was contacted for comment and did not supply a comment. However, Ms Jamie Cloete, intern EAP at Sharples Environmental Services, requested clarity on the term "habitable dwelling" from the Western Cape Government: Department of Health, on the 26th of August 2022, and was advised of the following:

- "Unfortunately, the Department of Health does not have an individual definition of an habitual dwelling as we are subject to the terms found in all national legislation and regulations as it pertains to health."
- The Officer advised that from their understanding and in relation to the establishment of a crematorium, the term habitual dwelling refers to a place where people live such as a house but in South Africa could also be informal dwellings. The Officer advised that if this is not helpful at all then they suggested that SES speak to the local municipality where the crematorium is planned specifically environmental health and the "zoning" departments.

As per the advice of the Western Cape Department of Health Officer, and considering the advice provided by the Air Quality and Environmental and Heritage Management Branches of the City of Cape Town, the proposed development is in compliance with the National Health Act, 2003 (Act No 61 of 2003), Regulations Relating to the Management of Human Remains, May 2013, Chapter 6, point 18 (a), therefore the development is not within 500m radius of a habitable dwelling.

#### **2.3.3.4. Concerns Related to Alternative Sites**

Based on the previous concern, addressed in Section 2.3.3.3. there were concerns raised that an alternative site should be considered, as well as other alternatives. The Western Cape Guideline on Alternatives (March 2013) was adopted in the BAR, and it is key to note that while there are multiple alternatives that can be investigated, the Guideline states that, "...a range of alternatives exist, not all of which are necessarily appropriate for each EIA." In compliance with this Guideline, alternatives assessed in the BAR include:

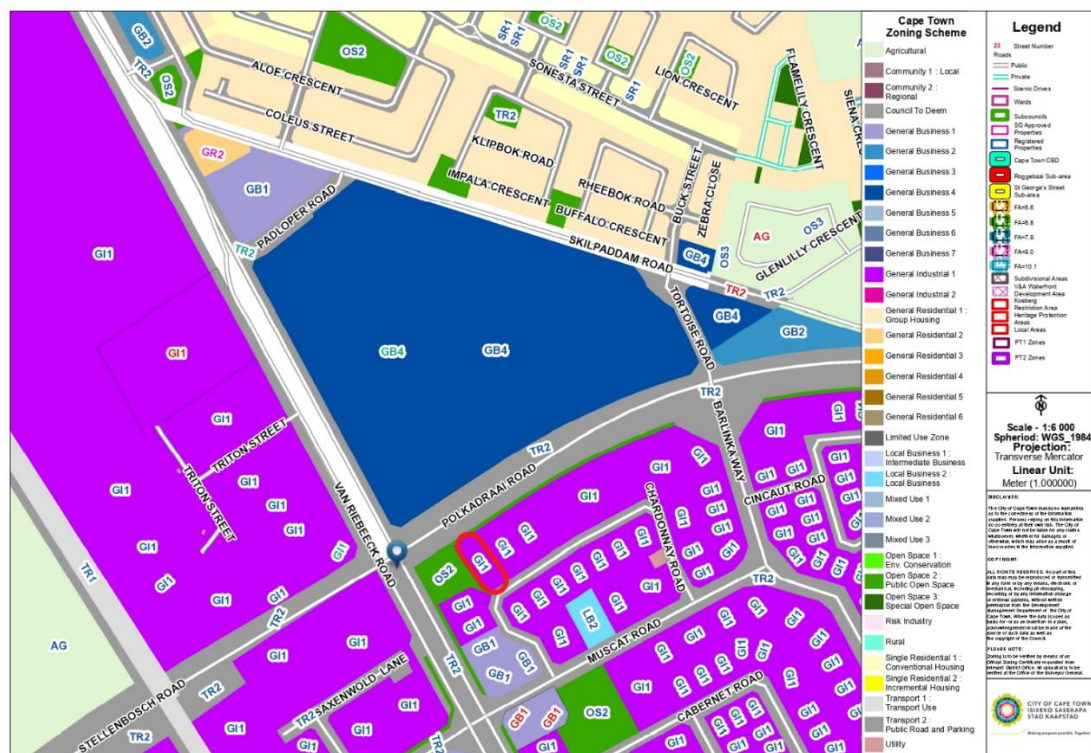
- Site Alternatives – two were considered.
- Design Alternatives: Stack Height – three were considered.
- Fuel Alternative – three were considered.
- Operational Alternatives – three were considered.

An Alternative Site was considered, that being ERF 358 in the Blackheath area, Saxenburg Business Park (see Figure 12 and 13). The proponent considered the site previously, as he was in communication with the real estate agent. Therefore, the EAP considered the site in Section H of the BAR, however it was determined that the site was within 400m's of a dense residential area, was adjacent to a main road, and opposite a shopping mall. The main constraint was the lack of agreement with the landowner, making this a highly unfeasible option.





**Figure 12: 500m radius from Proposed site Alternative 2 (CapeFarmMapper, 2022).**

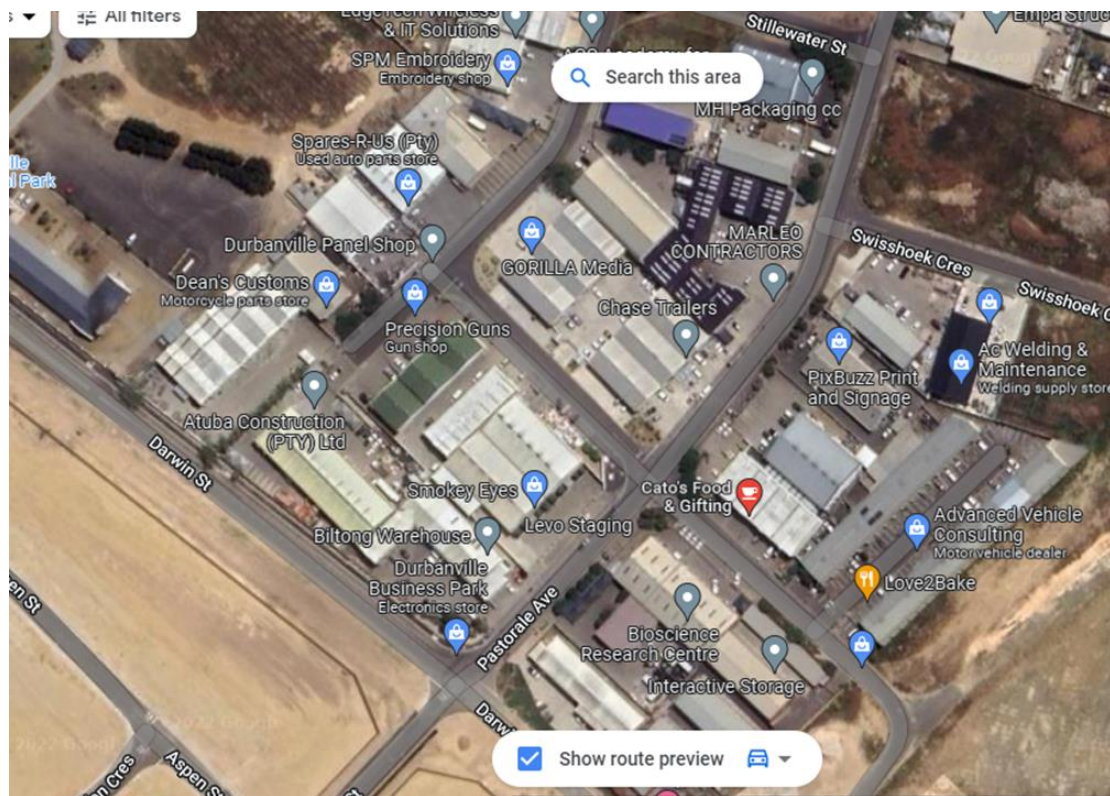


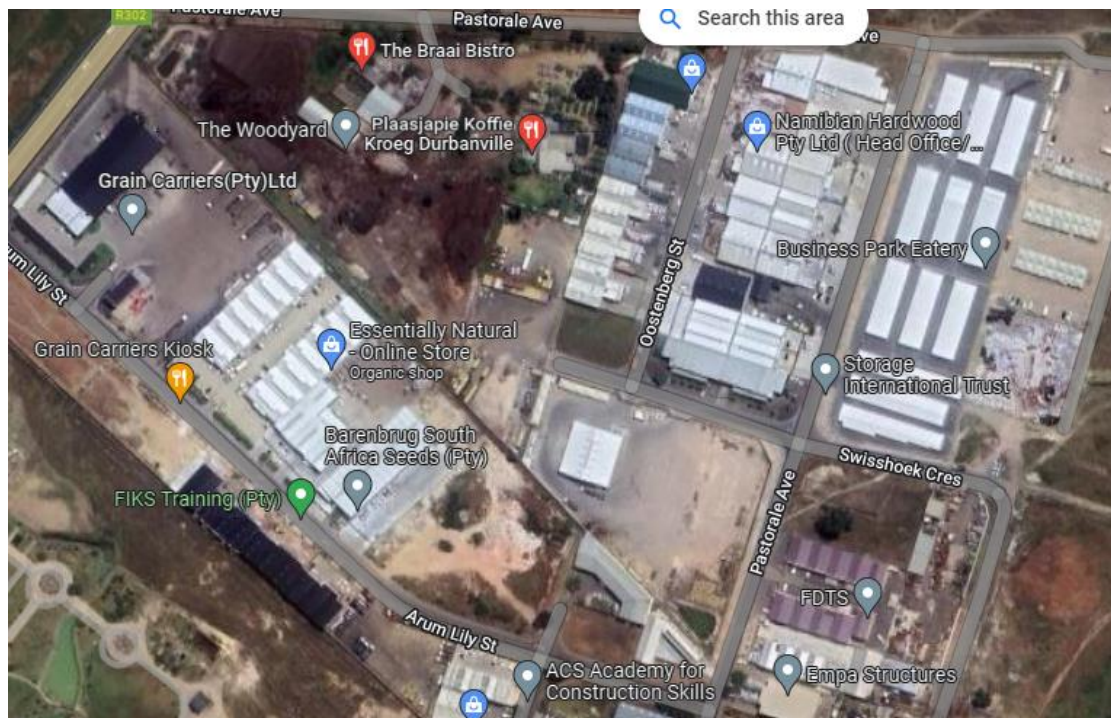
**Figure 13: CoCT Zoning Map for Proposed Site Alternative 2 - ERF358 BlackHeath Industria (red polygon).**



The preferred site, ERF 2433, Montague Gardens, was considered in a similar manner, and proved to have significantly more benefits, being appropriately zoned, with significantly low environmental impacts (the Health Specialist confirmed that the health risks are low to negligible, considering the outcome of the air quality assessment as well). The most significant socio-economic issue that of perception which has been addressed previously. Further to this the City of Cape Town Recreations and Parks Department: Cemetery Management Branch, indicated that crematoriums within the City of Cape Town are encouraged. In addition, the proponent was able to enter into an agreement with the landowner, securing the property financially and investing in the future development of the site, making this the most feasible and reasonable option. Therefore, the EAP proceeded to assess only the Alternative 1 Site – Erf 2433 Montague Gardens.

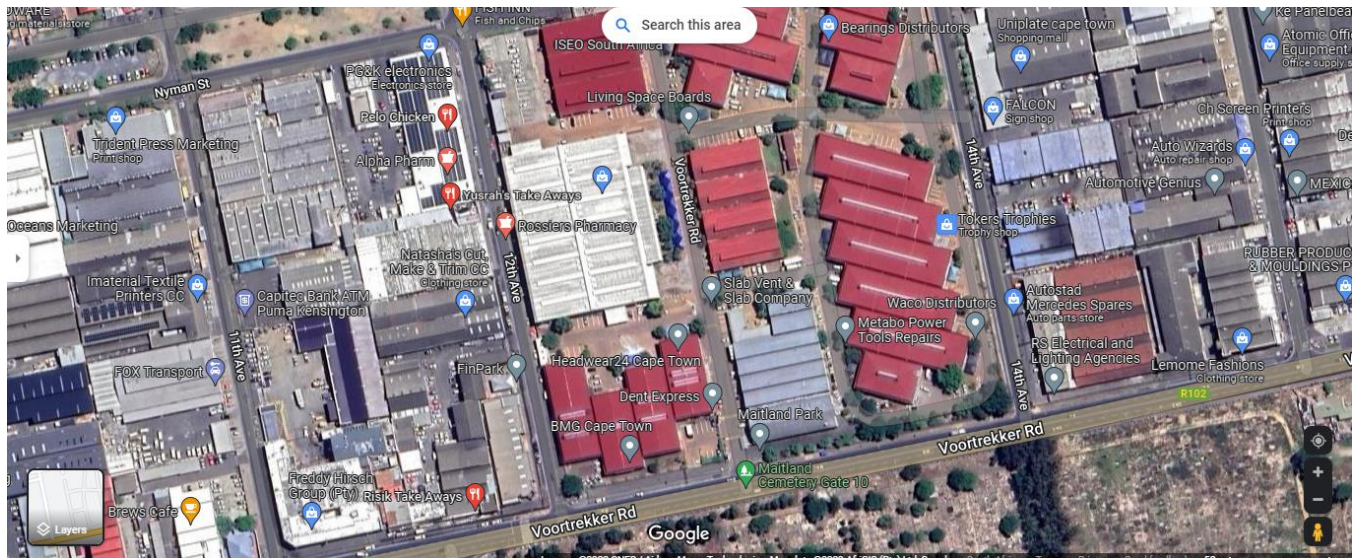
Site selection took into consideration the surrounding land uses as those around the existing crematoriums (Maitland and Durbanville Crematoriums). While it is acknowledged that these facilities were established prior to the 2013 regulation, the surrounding land uses have changed over the years. It is noted that the surrounding land uses are similar to those surrounding the proposed site in Montague Industria, including businesses, food handling (take-aways), etc.





**Figure 14: Existing commercial and businesses within 500m radius of Durbanville Crematorium.**





**Figure 15: Take-aways and businesses within 500m radius of the Maitland Crematorium, to the north.**



**Figure 16: Take-aways and businesses within 500m radius of the Maitland Crematorium, to the south.**

### 2.3.3.5. Concerns Related to the Services Demand on Site.

The AADD has been calculated in the Final BAR, it was determined that if the estimated 8 labourers are appointed, the AADD is approximately 287,09L, as calculated using the Think Water Calculator, accessed via <https://coct.co/thinkwater/calculator.html>. Activities included in this estimation are: toilet flushing, hand washing, washing dishes, drinking water, potentially cooking (to wash fruits/veg for consumption), and cleaning.

As per point 93 – 96 of the Comments and Responses Table the City of Cape Town confirmed that:

- There is likely sufficient bulk water capacity.
- The site is served by a 150mm sewer in Stella Street and a 225 mm sewer at the north Side of the site.
- Sewer flows to Koeberg Road Pump Station which has been identified for an upgrade over the next few years.
- The proposed development drains to the Potsdam Wastewater Treatment Plant (WWTW).



- The Potsdam WWTW is currently at capacity and is being upgraded. Completion date for
- the upgrade is expected to be the 4th quarter of 2027.
- Provided the water consumption is below the 2.88kl/day for the proposed redevelopment water and sewer capacity could be accommodated.

#### Water:

As per the AADD calculated by the EAP, 287,09L this is far lower than the 2.88kl/day indicated by the City of Cape Town.

#### Sewer:

If approximately 75% of the water demand is estimated for sewer demand, then the sewer demand will be far lower than the current demand and can be accommodated based on the bulk capacity confirmation (as mentioned by the City of Cape Town).

#### Wastewater

The City of Cape Town advised that in the event of the proposed development discharging any industrial type effluent into the municipal sewers, an application to discharge industrial effluent into the municipal sewer system will be required. The business owner essentially need to apply to Shahied Solomon (Shahied.Solomon@capetown.gov.za) or Molepana Ramonyai (Molepana.Ramonyai@capetown.gov.za ) for permission to discharge. These City Officials will be able to guide the developer/owner with regards to the process. This has been included as a condition of Environmental Authorization.

Any wastewater from cleaning will be handled as above, alternatively disposal at Vissershok Hazardous Waste Disposal Site will be considered. However, it is recommended that cleaning of the facility be undertaken with chemicals that require as little water as possible, for example Spray Klean Flight. Specifications include (The Go Green Store, 2022)\*:

- Tested by the SABS and is proven to kill 99.9% of all known bacteria.
- Registered with the NRCS as an Anti-Bacterial detergent.
- Biodegradable
- Non-Toxic
- Contains no Bleach or Ammonia
- Non-abrasive
- Non Flammable
- Multi-Purpose Detergent
- Can be diluted up to 25:1 or used in its concentrated form. For full anti-bacterial effect spray on and leave for 5 minutes wipe off

\* <https://ggstore.co.za/product/spray-klean-flight-5l-4/>

The dust mitigation measures have been carried through carried through to the operational phase of the BAR, and this will be addressed as an impact, as per Section H.

#### Electricity:

Eskom has confirmed that there will be no impact on any Eskom existing or planned infrastructure. Considering that the proposal will involve LPG for the furnaces (the dominant energy consumer on site), the reliance on Eskom infrastructure will be from the lights, office computers, and reefer coolers.

### 2.3.3.6. Concerns Related to LPG and Major Hazard Installation Requirement.

Major Hazard Installations are predominantly a health and safety aspect.

There are numerous differences highlighted in the BAR between, natural gas and LPG, however ultimately LPG was the preferred fuel, this is mostly based on access and sustainable supply. Gas bottles are used to supply LPG vs natural gas conveyed by pipeline, given that there is no existing gas pipeline in close proximity to the site, nor is there any future plan for this. LPG is the preferred option, as suppliers are more common, as demand has grown, and therefore, there will be less operational delays, resulting in backlogs of corpses on site.

Whether or not this facility will warrant the need for a Major Hazardous Installation licence will be decided, only if the proposal is awarded an Environmental Authorization. The EAP has advised that in terms of the City of Cape Town Community Fire Safety By-law, 2002 (as amended 2015), an application for a flammable substance certificate must be submitted to the controlling authority, which in this case is the CCT Chief Fire Officer. This is to include:

- A final layout plan must be provided depicting the location of the Liquefied Petroleum Gas (LPG) storage tanks.
- A screening risk assessment to establish if the facility will constitute a Major Hazard Installation or if additional site-specific mitigation measures are required, for example, a blast wall between the LPG installation and perimeter or closest building, specific location of the LPG tanks on site where they pose the least risk, as well as fire-fighting equipment and ventilation, etc.
- A fire plan which complies with SANS 10400-T:2020 and the By-Law relating to Community Fire Safety of 2002 will have to be submitted prior to approval from Fire and Rescue Services.

### 2.3.3.7. Misconception in-terms of the Applicable Legislation.

I&AP's raised the concern that Listing Notice 2, Activity 6, was misinterpreted and a more comprehensive Scoping and Environmental Impact Reporting ("S&EIR") process should have been followed.

**Table 6: EIA Regulations, 2014 (as amended 2017), Listing Notice 2, Activity 6.**

Activity No(s):	Provide the relevant <b>Scoping and Environmental Impact Assessment Activity(ies)</b> as set out in <b>Listing Notice 2</b>
6	<p>The development of facilities or infrastructure for any process or activity which requires a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent, excluding—</p> <p><b>(i) activities which are identified and included in Listing Notice 1 of 2014;</b></p> <p>(ii) activities which are included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies;</p> <p>(iii) the development of facilities or infrastructure for the treatment of effluent, polluted water, wastewater or sewage where such facilities have a daily throughput capacity of 2 000 cubic metres or less; or</p> <p>(iv) where the development is directly related to aquaculture facilities or infrastructure where the wastewater discharge capacity will not exceed 50 cubic metres per day</p>

Above is a table with the description of this listed activity. As per the DEA&DP's comment on the Notice of Intent, dated 20<sup>th</sup> May 2022, DEADP Ref: 16/3/3/6/7/2/A1/20/3065/22; DEA&DP's Acknowledgment of the Application for Environmental Authorization, DEADP Ref: 16/3/3/1/A1/20/3027/22, dated 14<sup>th</sup> June 2022 and DEADP's comment on the DBAR, DEADP Ref 16/3/3/1/A1/20/3027/22, dated 11<sup>th</sup> of August 2022, included as Appendix E22 of the BAR, states that a BAR process must be followed, and Listing Notice 2 is not applicable.

The Competent Authority is DEA&DP, as the final decision maker on the application, it is their prerogative to decide on the appropriate environmental assessment in line with NEMA, 1998, EIA Regulations, 2014 (as amended 2017). Which they have done, and the EAP has complied with their requests and guidance. Further to this the DFFE (National Department of Fisheries, Forestry and Environmental), IQ department was consulted for verification on the interpretation of this exclusion. They have advised the following, in an email on the 6<sup>th</sup> of September 2022, from IQ@dffe.gov.za: *"The interpretation provided by the Western Cape Department of Environmental Affairs and Development Planning is correct."*

*Where an activity, listed under Listing Notice (LN) 1 is triggered by a proposed development, which also triggers activity 6 of LN 2, the exclusion would indeed apply and activity 6 would not be applicable."*

#### **2.3.3.8. Traffic Concerns.**

The proponent has committed to using non-descript trucks, not hearses. Therefore, the truck will transport and deliver more than one body. Based on this, the estimated truck load is 1-2 per day. Employee vehicles, potentially 8 (8 employees are considered for permanent working conditions). This is not a funeral home, therefore there will not be people attending funerals on site. Considering this and the fact that this is an industrial area, the traffic impact during the operational phase is considered negligible.

The Department: Transport & Public Works Western Cape Government and the City of Cape Town was contacted for comment, and neither raised the need for a TIA (Traffic Impact Assessment). As noted by Department: Transport & Public Works Western Cape Government in the Comments and Responses Table, "this Branch offers no objection to this proposed crematorium on the above erf, on condition that all the affected Directorates of the City of Cape Town approve of this development." No comments were received from the City of Cape Town regarding traffic.

#### **2.3.3.9. Concerns Related to Electrical Outages.**

Based on the recent onslaught of Eskom loadshedding and taking into account the site is supplied by Eskom, operational functions completely depending on electricity includes: lights, reefer coolers for storage of excess bodies (in an emergency), and computers in the office. However, the furnaces operate on LPG therefore furnaces can continue functioning, thereby avoiding continuous backlogs. As per the EMPr the proponent has been advised to ensure emergency plans are in place, and the consideration for outages will be included in this, and consideration will be given to:

- A back up generator;
- Be mindful of electrical disruptions like load shedding, when planning daily operations

The proponent will consider solar panels in future. This will not warrant an environmental authorization.

#### **2.3.4. Need and Desirability**

##### **2.3.4.1. Concerns Related to the Need and Desirability of this Proposal.**

The Need and Desirability has been highlighted in the BAR, with regard to the policies and legislation.

In terms of need, as per the Comments and Responses Table, the Recreations and Parks Department: Cemetery Management Branch (City of Cape Town) has confirmed that:

- The City of Cape Town is facing critical grave shortages in local municipal Cemeteries. This has resulted in families having to travel a lot further (40Km+) in future to find burial space.
- The creation of additional crematorium facilities is therefore encouraged, as cremated remains may be added to full family graves, thereby reusing existing graves locally.
- The current limited number of crematoria in the Western Cape proved to struggle during the past Covid 19 Pandemic, therefore additional crematoria facilities will be beneficial to the greater Western Cape Province.
- There is currently no crematorium in West Coast District as the crematorium Malmesbury closed down. This results in residents in the West Coast being discouraged to cremate from this region, having to pay extra for transporting deceased to Maitland or Durbanville for Cremation.
- The cost of establishing crematoria is significantly due to a lack of supply and demand disparity. As such the creation of additional crematoria could contribute to keep costs more competitive.

In terms of desirability the area is zoned appropriately, and the location meets the requirements as per the National Health Act. Further to this based on the proposed technology the technology has proven to meet the Air Emission Standards for New Plants. The Health specialist has confirmed that the risk to human health is low to negligible, therefore, the only real issue is perception. All mitigation as well as those for perception have been included in the BAR and EMPr for mitigation.

### **2.3.5. Other Concerns**

#### **2.3.5.1. Comments not Received from Organs of State or State Departments.**

Concerns were raised that comments needed to be supplied by various State Departments and Organs of State. As per Appendix F1 of the BAR, the relevant I&AP's have been included in the I&AP Register. This indicates the State Departments, Organs of State, Other Organizations, and Adjacent I&AP's that were automatically notified.

If comment was not provided within the legislated time frame, as per Chapter 2 of the National Environmental Management Act, 1998, EIA Regulations, 2014 (as amended 2017), point (4) "When a State department is requested to comment in terms of these Regulations, such State department must submit its comments in writing within 30 days from the date on which it was requested to submit comments and if such State department fails to submit comments within such 30 days, it will be regarded that such State department has no comments."

#### **2.3.5.2. Concern Related to Proponents Experience in the Industry**

Concerns related to the proponent claiming to be familiar with the crematorium industry in the Western Cape and their ability to implement mitigation measures have been raised.

It should be noted that in terms of the environmental authorization and relevant licenses/permits, once approved, is applicable to the holder, regardless of their background or experience in any industry. The proponent has provided a letter of commitment, as per Appendix E.24 of the BAR. Further to this the proponent will employ suitably experienced and skilled operators for the operation of the actual furnaces.

## 2. Conclusion

We believe that the concerns raised have been addressed and responded to in the sections above and the attached table.

Although exceedances were noted in the air quality modelling, the air quality specialist confirmed that the cumulative air quality impact of the facility is estimated by assuming that the maximum hourly concentration will be experienced every hour of every day in the three-year period, which would not be the case in reality.

Mitigation measures have included the proponent's compliance with the recommended operational manual for the furnaces, and given that the manufacturer is local, any significant maintenance can be dealt with swiftly by the manufacturer. Further to this the proponent has agreed to the following:

- Commitment to participate in the relevant community group so as to allow for open communication between the community and crematorium.
- Allowing stakeholders to raise concerns and questions, during operational phase, as well as make any monitoring documents available to any concerned stakeholder, through appropriate request from the proponent.

Based on the above findings, and their assessment, the Health Specialist acknowledged that some of the pollutants of concern listed in the Report (HIA) may already be present in ambient air at the point of impingement of the crematorium plume, contributing to exposure concentrations in excess of those estimated in the AQIA (Air Quality Report). Therefore, coupled with the details of the technology applied, the specialist concluded that the proposed Project poses negligible to no risk to human health.

All the proposed specialist mitigation has been integrated into the BAR except the:

- Auditing frequency from the Health specialist. Given that this is based on air quality monitoring the annual recommendation has been supported, as well as any further conditions based on the authorizing bodies recommendations.
- The stack height from the Air Quality report, has been considered, but found to not be feasible, as it would compromise the integrity of the technology, as the technology is designed to specifically perform as per the guarantee, with a 12m stack height.

It should be noted that mitigation measures have been integrated into the EMPr, and a number of conditions have been recommended for the Environmental Authorization, by the EAP. This is not a reflection on the proponent, but due diligence in terms of environmental management on the EAP's part, as mitigation will be applied as and when necessary, as impacts are anticipated.

## **APPENDIX A - STAKEHOLDER DATABASE (INLINE WITH POPI,2013)**

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## Interested and Affected Parties: Automatically Registered and Requests to Register

### Automatically Registered

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.							
DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
STATE DEPARTMENTS							
ESKOM	Mr J Geeringh	Automatic			GeerinJH@eskom.co.za	Email	Email
DEA&DP: Development Management (Region 1)	Ms. R. Isaacs		Private Bag X9086, CAPE TOWN, 8000	(021) 483 2700	<a href="mailto:rondine.isaacs@westerncape.gov.za">rondine.isaacs@westerncape.gov.za</a>	Email	Email
	Ms. T. Dreyer				<a href="mailto:taryn.dreyer@westerncape.gov.za">taryn.dreyer@westerncape.gov.za</a>		
	Admin				<a href="mailto:deadpeiaadmin@westerncape.gov.za">deadpeiaadmin@westerncape.gov.za</a>		
DEA&DP: Air Quality	Ms. J. Leaner		Private Bag X9086 Cape Town 8000	(021) 483 2888	<a href="mailto:joy.leaner@westerncape.gov.za">joy.leaner@westerncape.gov.za</a>		
	Ms. S. Benson				<a href="mailto:sally.benson@westerncape.gov.za">sally.benson@westerncape.gov.za</a>		



THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.							
DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
DEA&DP: Waste Management	Mr. S. Haider	Automatic	Private Bag X9086 Cape Town 8000	(0)21 483 2965	<a href="mailto:saliem.haider@westerncape.gov.za">saliem.haider@westerncape.gov.za</a>	Email	Email
DEA&DP: Pollution Management	Ms. A. McClelland			(0)21 483 2660	<a href="mailto:arabel.mcclelland@westerncape.gov.za">arabel.mcclelland@westerncape.gov.za</a>		
DWS: Berg River Management Area (Catchment Manager - Regional)	Mr. D. Daniels (Deputy Director: Berg CMA)		Private Bag X16 SANLAMHO F 7532	T: (021) 941 6189 C: (082) 370 3556	<a href="mailto:danielsd@dws.gov.za">danielsd@dws.gov.za</a>		

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.							
DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
Department of Water and Sanitation Western Cape Regional Water Use Authorisation Manager	Mr. W. Dreyer (Acting Deputy Director: Water Use Authorisatio n Berg/Olifant s Doorn and Assistant Director: Water Use Authorisatio n)	Automatic	Office: Spectrum 330 PO BOX: PRIVATE BAG X16, SANLAMHO F, 7532	Tel: 021 941 6185 C: 082 600 8684 Fax: 021 941 6077	<a href="mailto:dreyerw@dws.gov.za">dreyerw@dws.gov.za</a>	Email	Email
DWS: Berg River Control Environmental Officer Grade A)	Ms. N. Ndobeni	Automatic	Office: Spectrum 333	Tel: 021 941 6140 C: 083 661 8770	<a href="mailto:ndobenin2@dws.gov.za">ndobenin2@dws.gov.za</a>		
Western Cape Government: Department of Transport and Public Works	Mr. A. Cope	Automatic		26/08/2022 Mr. A. Cope requested to be removed from the I&AP register			

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.							
DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
Western Cape Government: Department of Health	Ms. S. Cupido (PA Office of Head)	Automatic	PO Box 2060, Cape Town, 8000	(0)21 483 3245/5417	<a href="mailto:shanon.cupido@westerncape.gov.za">shanon.cupido@westerncape.gov.za</a>	Email	Email
	Mr. G. Nevin (Chief Civil Structural Engineer)			021 483 9342	<a href="mailto:Graham.Nevin@westerncape.gov.za">Graham.Nevin@westerncape.gov.za</a>		
	Mr. A. Thomas				<a href="mailto:Adam.Thomas@westerncape.gov.za">Adam.Thomas@westerncape.gov.za</a>		

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.							
DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
Western Cape Government: Department of Human Settlements	Mr. N. Adriaanse	Automatic	Private Bag X9083, Cape Town, 8000	(0)21 483 2868/3911	<a href="mailto:nathan.adriaanse@westerncape.gov.za">nathan.adriaanse@westerncape.gov.za</a> ; <a href="mailto:human.settlements@westerncape.gov.za">human.settlements@westerncape.gov.za</a>	Email	Email
Heritage Western Cape	Ms. S. Barnardt	Automatic		T: 021 483 9533 F: 021 483 9845	<a href="mailto:stephanie.barnardt@westerncape.gov.za">stephanie.barnardt@westerncape.gov.za</a>		
ORGANS OF STATE							
CapeNature: Land use Manage: Landscape West	Mr. I. Adams	Automatic	PGWC Shared Services Centre, cnr Bosduif & Volstruis Streets, Bridgetown, Cape Town, 7764	Tel: 087 087 3188	<a href="mailto:iadams@capenature.co.za">iadams@capenature.co.za</a>	Email	Email

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.							
DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
South African Civil Aviation Authority	Ms. L. Stroh	Automatic	PO Box 174, Cape Town Internationa l Airport, 7525	Tel: 021 934 4744	<a href="mailto:strohl@caa.co.za">strohl@caa.co.za</a>	Email	Email
	Ms. E. Shogole	Automatic		Tel: 021 934 4744	<a href="mailto:shogolee@caa.co.za">shogolee@caa.co.za</a>		
City of Cape Town Municipality; Environmental & Heritage Management (EHM)	Mr. M. Theron	Automatic	Private Bag X9181, Cape Town, 8000	Tel: 021 400 1330	<a href="mailto:morne.theron@capetown.gov.za">morne.theron@capetown.gov.za</a>	Email	Advised that communication be sent to Mr M. Theron, and he would forward the correspondence to the various branches of the CoCT
City of Cape Town Environmental Resource Management Department: Head North (Milnerton to Atlantis, Durbanville / Kraaifontein)	Ms. S. Warnich- Stemmet	Automatic	Milnerton Municipal Offices, 87 Pienaar Road, Milnerton	Tel: 021 444 0599	<a href="mailto:sonja.warnichstemmet@capetown.gov.za">sonja.warnichstemmet@capetown.gov.za</a>	Email	Communication via Mr. M. Theron

**THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
City of Cape Town: Air Quality Management Unit	Mr. I. Gildenhuys (Head: Specialised Environment al Health)	Automatic	City Health Department Air Pollution Control Section PO Box 2185 Cape Town 8000	(021) 590 5202	<a href="mailto:ian.gildenhuys@capetown.gov.za">ian.gildenhuys@capetown.gov.za</a>	Email	Communication via Mr. M. Theron
	Ms. W. Kloppers (Regional Air Quality Practitioner)				<a href="mailto:wendy.kloppers@capetown.gov.za">wendy.kloppers@capetown.gov.za</a>		
	Mr. G. Manuel (Snr. Air Quality Practitioner)				<a href="mailto:gerswain.manuel@capetown.gov.za">gerswain.manuel@capetown.gov.za</a>		

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.							
DEPARTMENT/ AUTHORITIES	CONTACT PERSON	DATE REGISTERED	POSTAL ADDRESS	CONTACT NUMBER	EMAIL	METHOD OF NOTIFICATI ON	PREFERRED NOTIFICATION METHOD/RECEIPT OF DOCUMENTS
Ward Councillor - Ward 4	Ms. A. Benadie	Automatic	-	Cell: 083 400 8554	<a href="mailto:anthony.benadie@capetown.gov.za">anthony.benadie@capetown.gov.za</a>	Email	Communication via Mr. M. Theron
Milnerton Public Library	Ms. Ma Kuscus		81 Pienaar Road, Milnerton, 7441	Tel: 021 444 0815 Fax: 021 444 0820	<a href="mailto:milnerton.library@capetown.gov.za">milnerton.library@capetown.gov.za</a>		Email

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.						
ADJACENT I&APs						
PORTION/ERF	ORGANISATION/COMPANY	DATE REGISTERED	PREFERRED METHOD	METHOD OF NOTIFICATION	CORRESPONDANCE NOTES	
Erf 2433 SG Code: C01600360000243300000	A.S.A.P PVC (pty) M. Arslanyurekli	Automatic	Email	Email	Automatically registered	
Erf RE/35270 SG Code: C01600340003527000000	City of Cape Town				Communication via Mr. M. Theron	



## Requests to Register

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.					
COMPANY/ORGANISATION/ERF	CONTACT PERSON	DATE REGISTRTERD	PREFERRED METHOD	NOTIFICATION METHOD	CORRESPONDANCE NOTES
OTHER ORGANISATIONS					
Stella Cove Takeaways (Landowner: ERF 3098 and ERF 4217 )	Mr. PL Conning	12/07/2022	Email	Emailed	Registered 12/07/2022
Mossie begrafnisdienste Funeral Services	Mr. P.J. Mostert	03/08/2022			Registered and Commented 03/08/2022
ADJACENT I&APs					
Erf 4223 SG Code: C01600360000422300000	Mr. C. Cole  Property owner & occupier: Vizual Multi Service Group	08/07/2022	Email	Emailed / letter drop	Registered: 08/07/2022
Erf 4510 SG Code: C01600360000451000000	Mr. JM. Stoos (J.M.A.L. STOOS FAMILY TRUST)	11/07/2022		Emailed	Registered: 11/07/2022

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.					
COMPANY/ORGANISATION/ERF	CONTACT PERSON	DATE REGISRTERD	PREFERRED METHOD	NOTIFICATION METHOD	CORRESPONDANCE NOTES
Erf 2434 SG Code: C01600360000243400000	Mr. C. Murray	07/07/2022	Not specified	Letter drop	Registered: 07/07/2022
	Cecil Penny Racing (as well as MX24)	11/07/2022	Email		Registered: 11/07/2022
	Godwin Auto Electrical Mr. S. Godwin	15/07/2022			Registered 15/07/2022
	Multiquip Mr. C. Cartmell	27/07/2022			Registered on 27/07/2022

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.					
COMPANY/ORGANISATION/ERF	CONTACT PERSON	DATE REGISTRTERD	PREFFERED METHOD	NOTIFICATION METHOD	CORRESPONDANCE NOTES
ERF 36507 SG Code: C01600340003650700000	Improvon  LO Montague Park: Ms. F. Luis-Craig & Ms. L. Morojele-Zwane  Co-owners: Capital Propfund & Acucap Investments	07/07/2022	Email	Emailed and letter drop	Registered: 07/07/2022
	UK Emporium (Cape Town) Mr. J. Crookshank	29/07/2022		Montague Park correspondence	Registered: 29/07/2022
	Furniture Force (Pty) Ltd t/a Decofurn Furniture Mr. D. Neethling	01/08/2022			Registered: 01/08/2022
I&AP (REQUEST TO BE REGISTERED)					
Private Individual	I&AP 8	14/07/2022	Email	N/A	Registered: 14/07/2022

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.					
COMPANY/ORGANISATION/ERF	CONTACT PERSON	DATE REGISRTED	PREFFERED METHOD	NOTIFICATION METHOD	CORRESPONDANCE NOTES
Takealot.com	Ms. T. Sekgobela - Senior Legal Counsel (Regulatory and Compliance)	21/07/2022	Email	Notified via Montague Park correspondence	Registered 21/07/2022
Berlin Packaging - Bruni Glass	Mr A. Barnard	29/07/2022			Registered 29/07/2022
NeoLife International (Pty) Ltd	Ms J. Finlayson	01/08/2022		N/A	Registered 01/08/2022

THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.					
COMPANY/ORGANISATION/ERF	CONTACT PERSON	DATE REGISTERED	PREFERRED METHOD	NOTIFICATION METHOD	CORRESPONDANCE NOTES
Private Individual	I&AP 7	02/08/2022	Email	N/A	Registered: 02/08/2022
VVF Life Sciences South Africa (Pty) Ltd	Ms. B. Shepard	08/08/2022		Notified via Montague Park correspondence	Registered 08/08/2022
Massmart Wholesale (Pty)Ltd t/a Makro	C. Steyn	29/08/2022		N/A	Registered: 29/08/2022
Business Risk Solutions	Mr. H. Harris	08/09/2022		N/A	Registered 08/09/2022

## **APPENDIX B - MINUTES OF CLARIFICATION SESSIONS**

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**GEORGE**  
TEL: +27 (0) 44 873 4923 FAX: +27 (0) 44 874 5953  
EMAIL: info@sesc.net WEBSITE: www.sesc.net  
ADDRESS: 102 Merriman Street, George 6530  
PO BOX: 9087, George, 6530

**CAPE TOWN**  
TEL: +27 (0) 21 554 5195 FAX: +27 (0) 86 575 2869  
EMAIL: betsy@sesc.net WEBSITE: www.sesc.net  
ADDRESS: Tableview, Cape Town, 7441  
PO BOX: 443, Milnerton, 7435

## MEETING MINUTES

### PROJECT:

**THE PROPOSED CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN  
METROPOLITAN MUNICIPALITY**

Date: 25 August 2022

Time: 15h00 – 16h00

Venue: MTeams.

### Attendees:

Name of Attendee	Organization	Position in Organisation
R. Isaacs (RI)	Western Cape Government	Environmental Officer – Development Management
T. Dreyer (TD)	Western Cape Government	Directorate: Development Management
A. Adams (AA)	City of Cape Town (CoCT)	Spatial Town Planner
A. de Bruin (ADB)	CoCT	Metro Spatial Planning
G. Manuel (GM)	CoCT	Air Quality Management
I. Gildenhuys (IG)	CoCT	Air Quality Officer with City Health
K. Spalding (KS)	CoCT	Environmental and Heritage Management
M. Murcott (MM)	CoCT	Spatial Planning
S. Manie (SM)	CoCT	Water and Sanitation





S. Brice <b>(SB)</b>	CoCT	Head Of Cemetery Management, Recreation, And Parks
S. Warnich Stemmet <b>(SWS)</b>	CoCT	Heritage
W. Kloppers <b>(WK)</b>	CoCT	City Air Quality Management
A. Mohabeer <b>(AM)</b>	Engineer Thermal Systems	Machine Suppliers
S. Rieckert <b>(SR)</b>	Engineer Thermal Systems	Project Manager
C. Dunn <b>(CD)</b>	Yellow Tree	Atmospheric Impact Report
A. Sanker <b>(AS)</b>	SES	EAP
B. Ditcham <b>(BD)</b>	SES	EAP - Director
J. Cloete <b>(JC)</b>	SES	Intern EAP

#### Non -Attendees

Name of Attendee	Organization	Position in Organisation
V. Ribeiro <b>(VR)</b>	Niara Environmental Consultants	Environmental Consultant – Health impact assessment

#### Minutes

	Subject	Discussion	Action By
1.	<b>Welcoming</b>	<ul style="list-style-type: none"> <li>BD welcomed, everyone to the meeting and introduced SES attendees.</li> <li>All other attendees introduced themselves.</li> <li>BD explained the process of the meeting.</li> </ul>	
2.	<b>Introduction and Background</b>	<ul style="list-style-type: none"> <li>AS provided a brief background on the proposed development.</li> <li>AS stated that SES received comment on the proposed development from CoCT and DEA&amp;DP on 11 August 2022.</li> <li>AS stated Public Participation period was from 11<sup>th</sup> of July – 11<sup>th</sup> August 2022.</li> <li>AS reiterated that the purpose of the meeting was a clarification session to address concerns raised by CoCT and DEA&amp;DP.</li> </ul>	

3.	<b>Concerns related to the 500m radius from 'habitable dwellings', clarity required on acceptable definition</b>	<ul style="list-style-type: none"> <li>• BD asked that CoCT and DEA&amp;DP provide a definition of the term "habitable dwellings" as defined by their department. SES is awaiting a response from Western Cape Department of Health as to their definition of "Habitable dwelling".</li> <li>• IG stated that in terms of Air Quality, as a guiding definition "habitable dwellings" would be residential areas where people are living in residential dwellings. However, the Department of Western Cape Health would have the final say in defining the term.</li> <li>• BD stated that in terms of Building and planning definitions 'habitable dwellings' include many types of buildings where people live or where recreational activities take place. BD further said that this definition is broad and leaves very few places that would not be close to a place or work or areas where people gather.</li> <li>• ADB advised that from a spatial planning point of view there is nothing in terms of by-laws regarding 'habitable dwellings'. However in industrial areas, there already exists caretakers or gatekeepers living on these kind of sites. ADB further stated that if it were to be argued practically that 'habitable dwellings' are not within the 500 metre boundary, there might be caretakers already staying on such sites and this is allowed under municipal by-laws. ADB warned about looking at the practicability of the closest neighbourhoods and the preciseness of using a 500m buffer and how this may cause more issues.</li> <li>• BD agreed with ADB and reiterated that SES has received comments regarding the definition of 'habitable dwellings' and the impacts on surrounding communities. SES were aiming to understand the authorities concerns with regard to whether the concerns were related to the permanent residential neighbours or the people working on adjacent sites.</li> <li>• IG confirmed that the word 'habitable dwellings' was not defined in the regulation regarding human remains under the National Health Act. IG stated that they would define habitable dwellings as any residential area where people stay and sleep, not where people work or occupy business or industrial areas. IG raised the concerns by giving an example of a proposed crematorium application in Strand.</li> <li>• BD noted the comment and stated that should SES use the definition in terms of residential neighbourhoods, then there are no free standing residential units within 500 metres of the proposed site. BD pointed out on the east of the 500 m buffer zone exists a fire station which consists of various buildings, BD also stated that within the 500</li> </ul>	SES
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	<b>Subject</b>	<b>Discussion</b>	<b>Action By</b>
		<p>metre buffer exists the Montague Gardens industrial area and Montague Park next door to the proposed site.</p> <ul style="list-style-type: none"> <li>• AS presented the map indicating the buffer zones, proposed site and fire station.</li> <li>• IG queried whether the residential-looking buildings were part of the fire station complex.</li> <li>• BD stated it is unclear if the buildings are for admin purposes or residential purposes.</li> <li>• KS on behalf of ADB stated that the fire station is zoned as a utility zone and does not appear to be residentially zoned, so there should not be residential dwellings. Also advised that map from the city GIS system be included in the final submission.</li> <li>• BD confirmed that this was included in the DBAR and will be included in the Final BAR.</li> </ul>	

4.	<b>Concerns related to the technology clarity</b>	<ul style="list-style-type: none"> <li>• AS provided information that the furnaces to be used were designed by JTE BA 2 cremators designed by Johnson Thermal Engineering. Engineered thermal systems were included in the meeting because they have been granted the sole exclusive rights for the marketing manufacturing insulation and commissioning of the JTE brand of products. AS introduced AM and SR. AS raised the point that there was concern about the technology and more information about it was to be defined in the meeting.</li> <li>• AM stated that documents and information regarding the technology to be used may be shared with state departments and organs of state, however, this is confidential and should not be shared publicly. Permission was given to utilise crematorium AEL results.</li> <li>• AM explained a brief history about the cremator machines that have been installed in various municipalities.</li> <li>• AM stated that Johnson thermal uses a controlled air form of combustion. A residence time in the secondary chamber is of greater than two seconds and complete combustion of the gases comes from the primary chamber.</li> <li>• AM stated that odourless and smokeless combustion takes place. The odd bit of smoke that does release comes from the lacquer of the coffins.</li> <li>• AS showed the videos of the technology and stacks to present the level of combustion.</li> <li>• AM explained the process as the video played.</li> <li>• AM said at 750 degrees complete combustion takes place. Furthermore, AM stated that all machines are serviced, and the technology is proven and meets the emission standards</li> <li>• IG noted the general compliance with emission standards, and that many crematoriums do struggle to achieve compliance. IG notes that the Health Risk Assessment make recommendations of abatement equipment to be installed. IG warned of the matter pertaining to mercury compliance.</li> <li>• AM stated that abatement is not used on the cremators and has not been tested. AM explained that mercury accumulates in a human's body and abatement cannot remove mercury.</li> <li>• CD stated that mercury can be removed by dosing activated charcoal. A bag filtration systems or ceramic filtration system will be needed.</li> <li>• AM responded that this does not make economic sense and they have met air emission standards.</li> <li>• BD stated that SES has received an air emission and operation manual for the furnaces which will be included</li> </ul>	
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	Subject	Discussion	Action By
		<p>in the final submission and can be made available should it be required.</p> <ul style="list-style-type: none"> <li>• IG asked that the additional information be circulated for review.</li> <li>• BD confirmed the request.</li> <li>• AM added that the machines are not noisy, and the fan is insulated to reduce noise.</li> <li>• TD suggested that all the new information be made available to registered I&amp;APs and authorities for an additional 30 days and SES may need to consider an extension period.</li> <li>• BD responded that SES would consider this and discuss the way forward after the meeting.</li> </ul>	<p>SES</p> <p>SES</p>
5.	<b>Concern related to the air quality emissions</b>	<ul style="list-style-type: none"> <li>• AS explained that concerns were raised by CoCT regarding air quality emissions</li> <li>• CD stated that she received the ambient monitoring data from Eskom on the morning of the 25 August 2022. They provided the data from their site for PM<sub>10</sub> and NO<sub>2</sub> – the only two pollutants they were able to provide. This will be incorporated into the report.</li> <li>• CD mentioned that another concern was regarding a potential stricter NOx emissions limit to ensure there are not exceedances at the fence line - this will be investigated.</li> <li>• CD will also be looking at many different aspects such as extending stack heights to see if this will make a difference as well as chat with SES about any updated layout plan.</li> <li>• CD stated that in terms of the other I&amp;AP comments, she has added two more pollutants to the modelling to ensure they are below NAQA standards</li> <li>• IG will await the revised report for review and further comment.</li> </ul>	CD

	Subject	Discussion	Action By
6.	Concerns related to health impacts	<ul style="list-style-type: none"> <li>AS stated that Niara Environmental Consultants were appointed as the health practitioner – they could not attend the meeting. AS spoke on behalf of the health practitioner and made reference to their report, that the health impacts are influenced by the technology, and based on the technology being adopted and the guarantees that have been applied in terms of technology as well as the air quality findings, it was significantly low. The health impact will be clarified, and the final report will be included in the final BAR</li> <li>SM asked how much water is being used on site and if any chemicals were to be used on site, how will it be treated</li> <li>AS responded that there will be 8 employees on site, 287 litres per day will be used, which in terms of the comment is far less than the 2.88kl per day.</li> <li>AS advised that the chemicals will be used to clean the premises on site. The only contributors to the water demand will be the cleaning, washing of any food or vegetables, dishes etc. it is going to be minor as indicated. This will be indicated in the final bar.</li> <li>BD further mentioned that no water will be used in the process to clean internal machinery etc. all cleaning is done with brushes or hand, not water or chemical. There should not be industrial effluent.</li> <li>IG noted that there is no representative present in the meeting for Area Based Environmental Health.</li> </ul>	<p>SES</p> <p>SES</p>

	<b>Subject</b>	<b>Discussion</b>	<b>Action By</b>
7.	<b>Discussion and conclusion – way forward for Basic Assessment</b>	<ul style="list-style-type: none"> <li>• BD stated that SES will have discussion with the department for the need of an additional 30 days. Additional information regarding engineers and services providers of the cremations will be circulated, as advised by the manufacturer to the state departments and organs of state.</li> <li>• AS stated that all mitigation measures recommended by specialists will be included in the BAR and EMP, specific mention will be made to the operational manual that is provided by the manufacturer that the proponent will need to comply with.</li> <li>• AS stated that perception concerns will be addressed by recommending screening of off-loading areas and screening of the interface fence line between stella road and the site, there will be no storage site or funeral paraphernalia outside the building, the proponent has opted to use non-descript vehicles as opposed to funeral hearses to the site. SES has encouraged the use of cardboard coffins as opposed to the normal coffins that use metal hinges which contribute to air emissions. The proponent will adopt a complaints register on site. In terms of the community, the applicant will be willing get involved with the relevant community group and provide access to their monitoring report, should it be required.</li> </ul>	SES
8.	<b>General</b>	<ul style="list-style-type: none"> <li>• BD opened the floor to any concerns or comments.</li> <li>• IG asked if there is a data logging or a record keeping system in terms of the combustion volumes.</li> <li>• AS provided specifications of JTE BA2 Cremator. SES will confirm if it is being logged or recorded.</li> <li>• SB queried if the cremation is for humans and animals.</li> <li>• AS replied that it was only for human cremation.</li> <li>• BD thanked everyone and closed the meeting.</li> </ul>	SES

**Meeting concluded at 16h05**



**GEORGE**  
TEL: +27 (0) 44 873 4923 FAX: +27 (0) 44 874 5953  
EMAIL: info@sesc.net WEBSITE: www.sesc.net  
ADDRESS: 102 Merriman Street, George 6530  
PO BOX: 9087, George, 6530

**CAPE TOWN**  
TEL: +27 (0) 21 554 5195 FAX: +27 (0) 86 575 2869  
EMAIL: betsy@sesc.net WEBSITE: www.sesc.net  
ADDRESS: Tableview, Cape Town, 7441  
PO BOX: 443, Milnerton, 7435

## MEETING MINUTES

### PROJECT:

**THE PROPOSED CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN  
METROPOLITAN MUNICIPALITY**

Date: 29 August 2022

Time: 15h30 – 16h30

Venue: MStTeams.

### Attendees:

Name of Attendee	Organization	Position in Organisation
G. Frantz <b>(GF)</b>	DEA&DP	Directorate Pollution and Chemicals Management
B. Stevens <b>(BS)</b>	VVF Life Sciences, Montague Park	HR Manager
D. Neethling <b>(DN)</b>	Furniture Force (Pty) Ltd t/a Decofurn Furniture	Occupant
F. Luiz-Craig <b>(FLC)</b>	Montague Park	Landowner
J.M. Stoos <b>(JMS)</b>	JMAL Stoos Family Trust	Landowner
P.J. Mostert <b>(PJM)</b>	Mossie	Owner/Director
E. Bacela <b>(EB)</b>	Private Individual	Student – BA Honours GIS and Environmental Management
P. King <b>(PK)</b>	Cullinan & Associates Inc.	Attorney
Vershen <b>(V)</b>	Details not provided	Details not provided
C. Dunn <b>(CD)</b>	Yellow Tree	Atmospheric Impact Report
D. Mokotong <b>(DM)</b>	Niara Environmental Consultants	Environmental Consultant – Health impact assessment





A. Sanker <b>(AS)</b>	SES	EAP
B. Ditcham <b>(BD)</b>	SES	EAP - Director
J. Cloete <b>(JC)</b>	SES	Intern EAP

#### Non-Attendance

Name of Attendee	Organization	Position in Organisation
V. Ribeiro <b>(VR)</b>	Niara Environmental Consultants	Environmental Consultant – Health impact assessment

	Subject	Discussion	Action By
1.	<b>Introduction and Background</b>	<ul style="list-style-type: none"> <li>AS welcomed, everyone to the meeting.</li> <li>AS requested, that the Specialists introduce themselves on the chat, and all other attendees, please include their details on the MS Teams chat for record purposes.</li> <li>AS explained that the meeting was a clarification session and provided a brief background on the proposed development. AS stated that the session is to address the main concerns raised by the main I&amp;AP's.</li> </ul>	

	Subject	Discussion	Action By
2	<p><b>Concerns related to the adopted environmental process.</b></p> <p><b>2.1. Confirmation that a BA process is required, therefore no fatal flaw</b></p>	<ul style="list-style-type: none"> <li>AS stated there were concerns that a Basic Assessment Report (BA) was being employed as the type of environmental assessment. However, as per Appendix E22 of the draft BA, communication was received from the competent authority i.e. Department of Environmental Affairs and Development Planning (DEA&amp;DP), whom are the ones that make the decision on the application. DEA&amp;DP advised that a Basic Assessment Report is the applicable form of assessment, based on the triggering of Listing Notice 1.</li> <li>PK stated that her query related to that the assessment process generally relates to the listed activity in question as such when dealing with something like a crematorium and there is an emission of some sort, it doesn't make sense to them that a basic assessment is required which is related to a listed activity regarding dangerous goods when in fact listing notice 2 should apply. PK is aware that the department sent the letter and referred to activity 14 but suggested that it would be useful for the topic to be engaged more to get further justification, because the interpretation of that exclusion does not make sense.</li> <li>AS said this will be taken into consideration.</li> <li>BD referred to the wording used in listing notice 2, and due to the triggering of activity 14 of listing notice 1, listing notice 2 excludes activities which are identified and included in listing notice 1, therefore listing notice 2 is not applicable. AS presented the listing notice table as presented in the draft BA, while BD explained why listing notice 2 is not applicable.</li> <li>PK stated that the interpretation is different to their own understanding. They do not understand why it should be downgraded to a lesser assessment, given that when triggering any listed activity, their understanding is that the exclusion relates to where one has triggered those other activities in listing notice 1 which concerns emission licenses. PK further stated that it would be a good idea to have a discussion with SES regarding this.</li> <li>BD agreed that a meeting can be set to discuss.</li> </ul>	SES

3	<p><b>Concerns related to the technology clarity</b></p> <p><b>3.1. Potential for smoke to impact on the surrounding community and the internal facility</b></p> <p><b>3.2. Potential for odour to impact on the surrounding community and the internal facility.</b></p> <p><b>3.3. LPG adoption and safety</b></p>	<ul style="list-style-type: none"> <li>AS provided a brief background on the furnaces proposed to be used are JTE BA2 Cremators, designed by Johnson Thermal Engineering and supplied by Engineered Thermal Systems, and confirmed that the cremators are designed to meet the air emission requirements for new plants as specified in the National Air Quality Act (NAQA).</li> <li>BD confirmed that the manufacturer - Engineering Thermal Systems have provided information as proof including a guarantee that they have authorised to be shared in the clarification meeting. However, the proprietary information cannot be shared to the public.</li> <li>AS presented a flyer that provided information on the technology that is planned to be utilised. It was highlighted that: <ul style="list-style-type: none"> <li>it is a South African brand, which is important because when considering maintenance issues, it can be undertaken sooner rather than later.</li> <li>Operation of the technology is smokeless and odourless which was a concern highlighted by many.</li> <li>Installation and operating training has been included in terms of the Environmental Management Programme (EMPr). The applicant will comply with this document during the construction and operational phases.</li> <li>Maintenance plans and other consumables can be provided.</li> <li>The self-sealing hydraulically operated loading door controlled via push buttons as well as the fully automatic simple operation using touch screen input and plc. The touchscreen displays chamber temperatures and all essential status indications including time to the process completion.</li> </ul> </li> <li>GF queried enquired about viewing the furnaces in Cape Town to see that it is smokeless and odourless.</li> <li>AS stated that it has only been implemented in other provinces and these have been functioning for years including Pretoria and in KZN.</li> <li>BD asked that AS play the video supplied by the manufacturer that presents the emissions of the technology.</li> <li>JC played the video, and AS explained about the timing and lack of visible emissions.</li> <li>AS stated that attached to the draft BAR was Appendix L which shows information on the technology and also has the letter of compliance from the manufacturer. The manufacturers have confirmed information on how the</li> </ul>	SES
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		<p>cremators are designed to ensure the gas velocities are reduced and result in lower particulate pick up. Furthermore it ensures that there is complete combustion of gasses and odours before exiting the cremators stacks. It is also designed to ensure low carbon monoxide emissions and total combustion of complex volatile organic compounds. As well to ensure that no gasses or noxious fumes are emitted in the cremator machine room when the door is open. All this information was included in the Draft Bar and was made available for public perusal.</p> <ul style="list-style-type: none"> <li>• AS advised that LPG is the preferred source for these cremators. The alternative is natural gas however, it came down to natural gas supply being more unreliable.</li> <li>• AS stated that the storage capacity is looking to be approximately 80 cubic metres of LPG on site. The applicant has identified an experienced specialist to undertake a risk assessment and finalise layout plans for approval with the Fire Department, which will only be undertaken if the environmental authorisation is awarded.</li> <li>• PK pointed out that it mentions in the Health Impact Assessment that the 'Foul odour may be emitted at the crematorium due to continuous incineration of organic matter.' PK queried if this is not the case and is there going to be no odour?</li> <li>• AS replied that in terms of the odour, the technology has been applied in other areas and it has been monitored and there has not been any reports of odour emissions that have been problematic – in line with the manufacturers flyer. AS further added that the health specialist would provide further clarity in item 5 of the agenda because they have looked at the technology and site.</li> <li>• FLC – queried if the manufactured object has gone through any scrutiny to be approved by a board.</li> <li>• AS indicated that in terms of the manufacturer's compliance, they have to be compliant with manufacturing requirements. They are compliant in terms of SANS 347 and also SANS 329 which is the Industrial Thermal Processing Equipment Safety Requirements. They also adhere to standards required by SASOL and SAGA – South African Gas Association, indicated in their information.</li> <li>• GF queried about the LPG storage tanks and where this would be located on site and if a risk assessment has been conducted in terms of it being a hazard where would the most appropriate location be?</li> </ul>	
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	<b>Subject</b>	<b>Discussion</b>	<b>Action By</b>
		<ul style="list-style-type: none"> <li>AS stated that this would be confirmed by a specialist who can will be appointed to undertake the risk assessment and produce a final layout plan. This will only be done if the environmental authorisation is awarded for the project. This has been included as a recommendation for the environmental authorization.</li> </ul>	

4	<p><b>Concern related to the air quality emissions</b></p> <p><b>4.1. What are the harmful pollutants?</b></p> <p><b>4.2. Are they at harmful levels? To the surrounding community? To the labour within the facility?</b></p> <p><b>4.3. Are there mitigation measures included?</b></p> <p><b>4.4. Overall impact rating of the development, and what does this mean?</b></p> <p><b>4.5. What are the cumulative impacts based on the surrounding air emission contributors in the area?</b></p>	<ul style="list-style-type: none"> <li>• CD stated that air quality in South Africa is managed under NEMAQA – National Environmental Management Air Quality Act.</li> <li>• CD explained that section 21 of NEMAQA mandated the Minister of Environmental Affairs to publish listed activities that she believed at the time caused significant environmental impacts in terms of air quality. One of the listed activities are crematoria under subcategory 8.2. of Government Notice 893 (as amended). If you are triggering category 8.2 i.e. you are operating a crematorium then you must provide an atmospheric permission licence in order to operate fully and that is also a trigger for the BA. The proposed crematorium will require an atmospheric emission license to operate.</li> <li>• CD further stated that one of the studies that will be required is an air quality impact assessment or an atmospheric impact report. CD explained that as part of an atmospheric impact report, a harmful pollutant is identified and this is typically done by looking at the subcategory that the activity triggers and seeing which pollutants are regulated – so which pollutants does the facility once it comes into operation and if it comes into operation, what pollutants will they need to monitor and on an annual basis? For the crematorium there are 4 pollutants: (1) particulate matter (PM) – visible smoke – this is dust particles in a gas stream, (2) Carbon Monoxide (CO) – product of incomplete combustion – when combustion does not go all the way to the end to lead to carbon and oxygen you combust them to form carbon dioxide, if that does not occur to completion you put carbon monoxide in the middle and there will always be some kind of carbon monoxide because combustion is never absolutely perfect, (3) the oxides of nitrogen (NOx) – those occur when air contains mostly nitrogen and some oxygen – when air is exposed to high temperatures – then the nitrogen and oxygen combine to form NOx, (4) mercury (Hg) – originates from any mercury sources in whatever is being burnt so in the crematorium case it will generally be in the form of amalgam fillings. These were the pollutants that were considered harmful in the initial atmospheric report. Following some public comments on additional pollutants that may be present on crematoria, Yellow Tree looked at the list of pollutants that have been identified in emission inventories and identified two additional pollutants that were assessed – those being lead and benzene. Those were identified as potential harmful pollutants for crematoria.</li> <li>• CD explained how the Atmospheric Emission Report is</li> </ul>	
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		<p>conducted. The process includes utilising the emissions limit for crematoria. They ask themselves that if the crematorium is operating and its compliant with the emission limits, what level of pollutant will be permitted? They then place this information into an atmospheric dispersion model which takes pollutants, looks at weather patterns over the last couple of years, looks at buildings in the surrounding areas, how high are the stacks, what is the typography in the area and then tries to predict what the concentration of pollutants are.</p> <ul style="list-style-type: none"> <li>• CD further explained that they look at the fence line of the facility, because the fence line acts as a receptor for businesses and residents in the immediate surroundings of the facility. They also place sensitive receptors at boundaries of nearby residential areas. This is to monitor what the concentration of pollutants are going to be at those receptors if the crematorium was to go ahead. The findings were that in general there were no exceedances of the National Ambient Air Quality standards- this is what they are benchmarking against, to see that when the crematorium is in operation will it exceed any Ambient Air Quality Standards. CD further added that in general there were no exceedances except for two instances – the first instance was at NO<sub>2</sub> (Nitrogen Dioxide) and that was predicted to exceed NEMAQA standards at the fence line of the facility, and then also using one set of data for PM<sub>10</sub> there was expected to be some exceedances. CD then overcame this by increasing the stack height by 16 metres and found by doing so there were barely any exceedances of the Ambient Standards – this will be added as a recommendation in the report.</li> <li>• CD reiterated that the report assumes that the facility is compliant with emission standards and the manufacturers of the cremators have provided assurance that the cremators will be able to comply with emission limits and this is what the air dispersion model is based on.</li> <li>• CD then addressed point 4.5. regarding the cumulative impacts based on the surrounding air emission contributions in the area. Taking into account the base line air quality data in the area (obtained from air quality monitoring stations around the city), they look at the data base and see which stations are closest to the facility and which has the best set of data. This is used in the report and in the predictions done. The monitoring stations are monitoring the air, as it is presently therefore they already take into account the contribution of other air quality impacts in the area. CD gave an example of Astron Energy Refinery, the impact of that facility is already</li> </ul>	
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	Subject	Discussion	Action By
	General	<p>being taken into account in the data studied and Yellow Tree looks at what the additional impact will be of the crematorium, whether this will push above the ambient air quality standards, the answer to this was found to be no because the stack heights needed to be increased.</p> <ul style="list-style-type: none"> <li>• CD asked if there were any further questions.</li> <li>• FLC queried that when measuring the fumes - for lack of a better word- , is this done when the refinery is at full capacity because it has not been in operation for some time, and this would presumably be lower in comparison to when they might be in full capacity.</li> <li>• CD replied that Yellow Tree looked at the last three years that is between 2019-2021.</li> <li>• FLC- responded that unfortunately the refinery hasn't been in operation since then because of the tragic incident that took place. However, FLC is glad that it has been taken into account, should it be at full capacity.</li> </ul>	



	Subject	Discussion	Action By
5.	<p><b>Concerns related to health impacts</b></p> <p><b>5.1. What are the actual risks.</b></p> <p><b>5.2. Mitigation presented to address these risks.</b></p> <p><b>5.3. Overall impact rating, and what does this mean?</b></p>	<ul style="list-style-type: none"> <li>DM stated that she has been informed that there were concerns regarding the impact on the surrounding environment. With regards to that, they have noted that there may be smoke but that will be relatively smell-free and odourless.</li> <li>DM stated that with regards to the LPG it is noted that inhalation of LPG at high concentrations even for a short period of time can cause seizures, comas or heart problems. Inhalation of these gasses can result in drowsiness and dizziness or respiratory irritations. Exclusive to the concentrations this may also cause breathing problems. However, it is noted that these impacts are highly improbable, and the impacts will be relatively low. In time the potential impacts are small and should not have negative influence on decisions regarding the proposed development. The operation phase with or without mitigation will not have significant negative impacts on the environment and human health. There is high confidence associated with impact and their reversibility of the impact is also predicted to be high.</li> <li>DM mentioned that in terms of the mitigation measures they have noted that technology plays a major role in minimising the impacts that are anticipated to arise from the crematorium which speaks to impacts including the design of the system which Ameesha Sanker has spoken to previously.</li> <li>DM stated they also looked at suitable air pollution control equipment which could include temperature control, carbon injections, fibre filtrations, air tightness of combustion chambers, and also monitoring of gas chambers such as oxygen, carbon monoxide concentrations and applying the relevant emission limit values.</li> <li>BD asked DM to confirm that the overall health concern is not significant</li> <li>DM confirmed that there was a comment in the report that there may be health impacts but that they do not anticipate them to be significant</li> </ul>	
	<b>General</b>	<ul style="list-style-type: none"> <li>AS asked if there were any further questions.</li> <li>None were raised.</li> </ul>	

<p><b>6. Concerns related to the site (Perception).</b></p> <p><b>6.1. Zoning confirmation, and not within 500m radius of habitable dwellings (residential zones).</b></p> <p><b>6.2. Other surrounding air emissions.</b></p> <p><b>6.3. Perception mitigation presented.</b></p> <p><b>6.4. Applicant's commitments.</b></p>	<ul style="list-style-type: none"> <li>AS responded to 6.1. of the agenda. AS explained that one of the conditions is that crematoriums should not be within 500m radius of habitable dwellings which is largely defined as residential zones and it has been confirmed that there are no habitable dwellings within the 500 m radius, therefore it is compliant.</li> <li>Another point raised is that the area is an industrial area. There were concerns regarding the cultural concerns however the fact that this is an industrial area, it should not accommodate residential or accommodation in any way. This is predominately a working environment and there are other risks zones in close proximity. In terms of municipal by laws the site is zoned appropriately.</li> <li>AS stated that point 6.2 in the agenda regarding other surrounding air emissions was mentioned addressed by CD previously during the clarification session.</li> <li>AS addressed point 6.3. in terms of perception, the BA and EMPr will include mitigation such as: <ul style="list-style-type: none"> <li>➤ screening of the interface fence line between stella road and the site, using greenery methods such as potted plants and screening offloading areas.</li> <li>➤ No storage of funeral paraphernalia outside the building.</li> <li>➤ Reducing signage on the site.</li> <li>➤ Non-descript vehicles will be used as opposed to funeral hearses to the site.</li> <li>➤ The machines are not noisy as the fan is insulated to reduce noise. The noise that takes place within the building is at acceptable levels.</li> </ul> </li> <li>AS addressed point 6.4. regarding the applicant's commitments. The applicant has committed to: <ul style="list-style-type: none"> <li>➤ Encourage the use of cardboard coffins, which help reduce hazardous emissions which would usually come from coffins and the metal hinges on it.</li> <li>➤ They will also accommodate any complaints the public might have by adopting a complaints register on site.</li> <li>➤ The applicant will be willing to get involved with the relevant community group and provide access to their monitoring reports, should it be required.</li> </ul> </li> <li>BD added that regarding monitoring this refers to air quality monitoring reports – should someone request to</li> </ul>	
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	Subject	Discussion	Action By
	<p><b>6.5. Mitigation presented during operational phase.</b></p> <p><b>General</b></p>	<p>view the reports, the applicant is willing to make it available.</p> <ul style="list-style-type: none"> <li>AS stated that SES will include the previously mentioned mitigation measures, as well as the applicant commitments and specialist mitigation measures in both the EMPR and BA. AS further noted that one of the main mitigation measures implemented during the operation phase is compliance with the operational manual as specified by the manufacturer as well as training for all operators that will be employed. As well as compliance with all licences, authorisations and permits</li> <li>BD asked that anyone is welcome to make recommendations.</li> <li>AS opened the floor for anyone to make recommendations.</li> <li>AS asked if there were any further questions.</li> <li>None.</li> </ul>	
7.	<b>Way forward for Basic Assessment</b>	<ul style="list-style-type: none"> <li>AS stated that at present the date for submission is 8 September 2022, and requested any general comments, recommendations or concerns.</li> <li>BD stated then when the final BA is submitted, the comments and response table can be made available to any registered I&amp;APs who would like to view it.</li> <li>No further questions, concerns or recommendations were raised.</li> <li>Meeting closed at 16:25pm.</li> </ul>	

**Meeting concluded at 16h25**

## **APPENDIX C: PROOF OF PUBLIC PARTICIPATION**

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**GEORGE**  
TEL: +27 (0) 44 873 4923 FAX: +27 (0) 44 874 5953  
EMAIL: info@sesc.net WEBSITE: www.sesc.net  
ADDRESS: 102 Merriman Street, George 6530  
PO BOX: 9087, George , 6530

**CAPE TOWN**  
TEL: +27 (0) 21 554 5195 FAX: +27 (0) 86 575 2869  
EMAIL: betsy@sesc.net WEBSITE: www.sesc.net  
ADDRESS: Tableview, Cape Town, 7441  
PO BOX: 443, Milnerton, 7435

# PROOF OF PUBLIC PARTICIPATION

## FOR

### THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.



#### Contents

1)	On-Site Notices:.....	3
2)	Site Notice .....	5
3)	Letter-Drops.....	8
3.1.	Occupiers and Landowners Present .....	15
3.2.	Letter-drops – No Occupiers and Landowners Present .....	16
4)	Other I&AP Correspondence Methods.....	24
4.1	Alternative correspondence with adjacent landowners and/or occupiers .....	24
4.2	State Departments and Organs of State .....	24
4.3	Air Emission Licence Application Comments.....	24
5)	Newspaper Adverts.....	24
6)	Hard Copies Distributed for Public Viewing.....	27
7)	Social Media Notifications .....	28
8)	Other Measures Undertaken .....	29



Sharples Environmental Services.cc (SES) undertook Public Participation on Wednesday 06 July 2022. The Public Participation dates were from the 11<sup>th</sup> of July 2022 to 11<sup>th</sup> of August 2022. This was undertaken by EAPs - Ms Ameesha Sanker (Senior EAP), Ms Jamie Cloete (intern EAP) and Mr Willan Adonis (Junior EAP). A summary of the public participation undertaken is depicted in Figure 1 and Figure 2



Figure 1: Letter Drops and Site Notice Points (CapeFarmMapper, 2022)

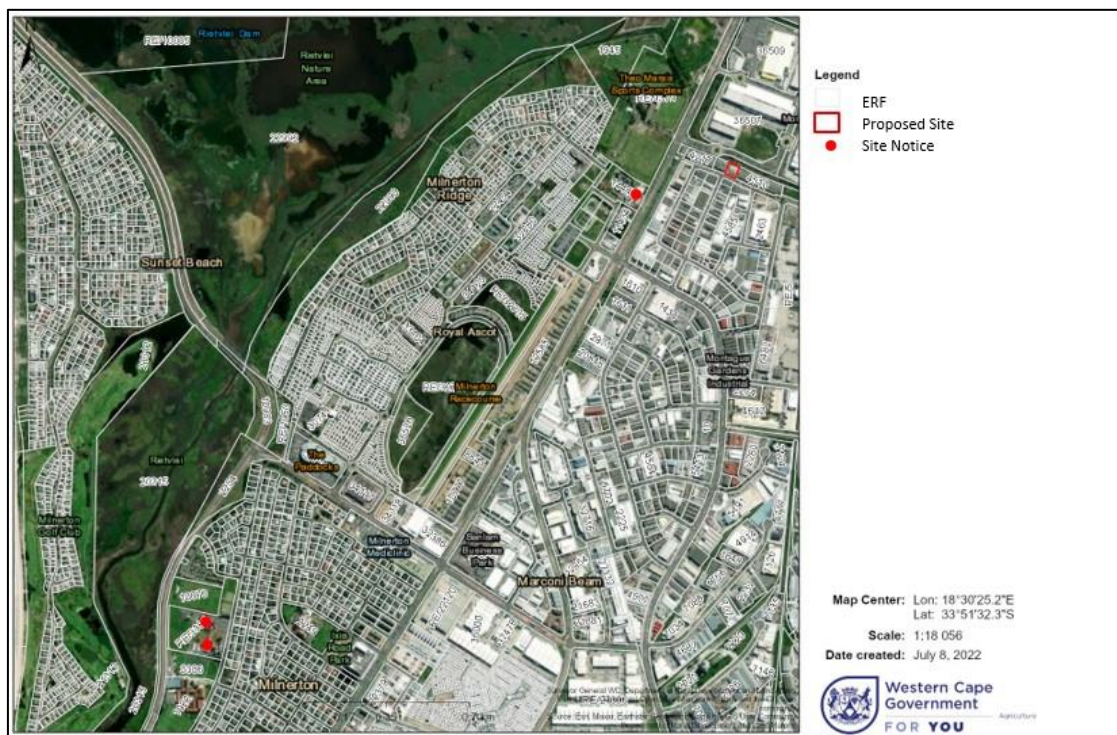



Figure 2: Site Notice points at Milnerton Public Library, Municipal Administrative Offices and Milnerton Fire Department (CapeFarmMapper, 2022)

## 1) On-Site Notices:



**GEORGE**  
TEL: +27 (0) 44 873 4923 FAX: +27 (0) 44 874 5953  
EMAIL: info@sesc.net WEBSITE: www.sesc.net  
ADDRESS: 102 Merriman Street, George 6530  
PO BOX: 9087, George, 6530  
**CAPE TOWN**  
TEL: +27 (0) 21 554 5195 FAX: +27 (0) 86 575 2869  
EMAIL: betsy@sesc.net WEBSITE: www.sesc.net  
ADDRESS: Tableview, Cape Town, 7441  
PO BOX: 443, Milnerton, 7435

---

**NOTICE OF PUBLIC PARTICIPATION FOR THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT AND APPLICATION FOR ATMOSPHERIC EMISSIONS LICENCE**  
**INVITATION TO REGISTER AS AN INTERESTED & AFFECTED PARTY (I&AP) AND PROVIDE COMMENT ON THE PROPOSED DEVELOPMENT**

---

**PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN MUNICIPALITY, WESTERN CAPE**

---

**LOCATION:** The proposed development site is situated on ERF 2433 on Stella Road in Montague Gardens Industrial which is accessible from Koeberg Road (M5).

**DEVELOPMENT DESCRIPTION:** Platinum Pride Crematorium proposes to establish a crematorium on ERF 2433. The site is approximately 2 506,7 m<sup>2</sup> in size and the proposed crematorium facility will be accommodated within the existing warehouse on the site.

**LISTED ACTIVITIES:** A Basic Environmental Impact Assessment will be undertaken in terms of the 2014 EIA Regulations, as amended (GN No R. 324 – 327 of 2017), as part of the application for Environmental Authorisation to the Department of Environmental Affairs and Development Planning. The proposed development triggers the 2014 EIA Regulations, as amended 2017, in terms of:

**Listing Notice 1 (GNR No. R. 327) Activity 14.**

In terms of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), the following listed activities are applicable:  
**Subcategory 8.2:** Crematoria and Veterinary Waste Incineration

**OPPORTUNITY TO PARTICIPATE:** Potential Interested & Affected Parties (I&APs) are invited to register & provide comment on this proposal. I&APs must provide their comments together with their name, contact details (preferred method of notification, e.g. e-mail or fax number) & indicate any direct business, financial, personal or other interest they have in the application to the applicable contact person indicated below. Requests for registration &/or comment must reach us within the 30-day public participation period provided below. All private information will be managed in line with the POPI Act, 2013.

**I & AP REGISTRATION AND COMMENT PERIOD: 11 July 2022 - 10 August 2022.**

**FOR MORE INFORMATION:** The Post-application Draft Basic Assessment Report and associated documents are available on the SES website (www.sesc.net) under the "public documents" section. A physical copy of the report can also be found at the Milnerton Public Library at 81 Pienaar Rd, Milnerton, Cape Town for 30-days. The AEL application will be made available for public review upon request in terms of section 38(3) of NEM:AQA.

For more information on the **Basic Assessment Report** contact **Ms. Ameesha Sanker** / Tel: 021 554 5195 / Fax: 086 575 2869 / Email: [ameesha@sesc.net](mailto:ameesha@sesc.net) / P.O Box 443, Milnerton, 7435, or for information on the **AEL Application** contact **Ms Caitlin Morris** / Email: [caitlin@yellowtree.co.za](mailto:caitlin@yellowtree.co.za) Unit D14, Prime Park, Mocke Road, Diep River, 7800

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Figure 3: On-Site Notice

In compliance with regulation 41 (2) (a) and (b) of the EIA Regulation 2014 (as amended 2017) an appropriately sized site notice was placed on a light-pole along the fence line of the proposed site, on Stella Road so as to be accessible by the public. To ensure the required information could be clearly viewed, the site notice was formatted in text lettering and size accordingly. Positioned at Co-ordinates; Latitude: 33°51'5.43"S ; Longitude: 18°31'17.91"E.



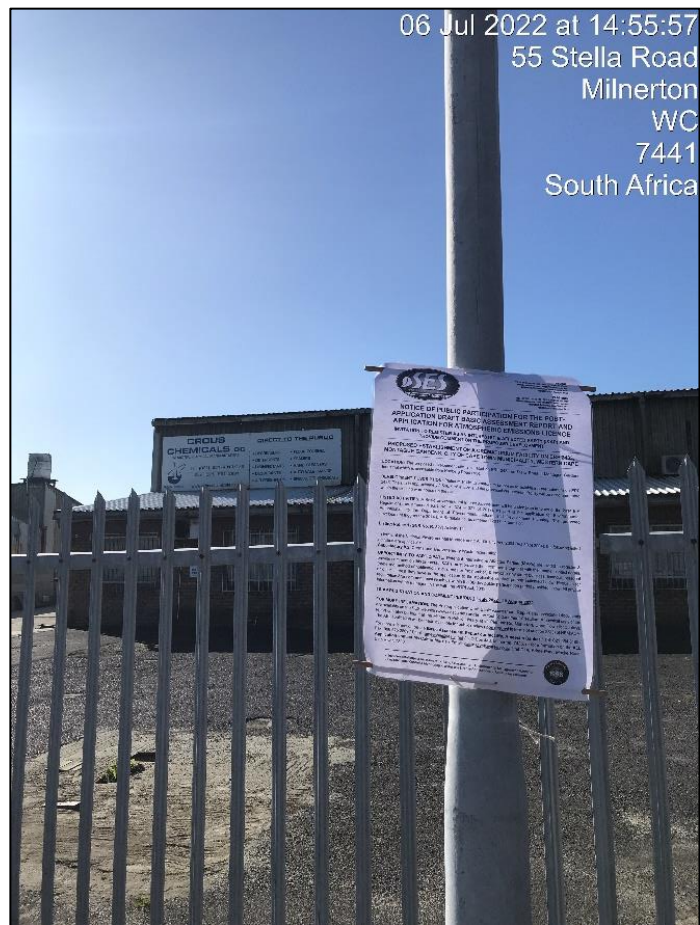


Figure 4: On-site Notice - Stella Road



## 2) Site Notice

In line with regulation 41 (2)(a) of the EIA regulations, 2014 (as amended 2017), three additional colour A4 site notices were erected on Pienaar Road (one at the local Milnerton Public Library and another at the City of Cape Town Municipal Administrative Offices) and Koeberg Rd (Milnerton Fire Station Department) for public notification.

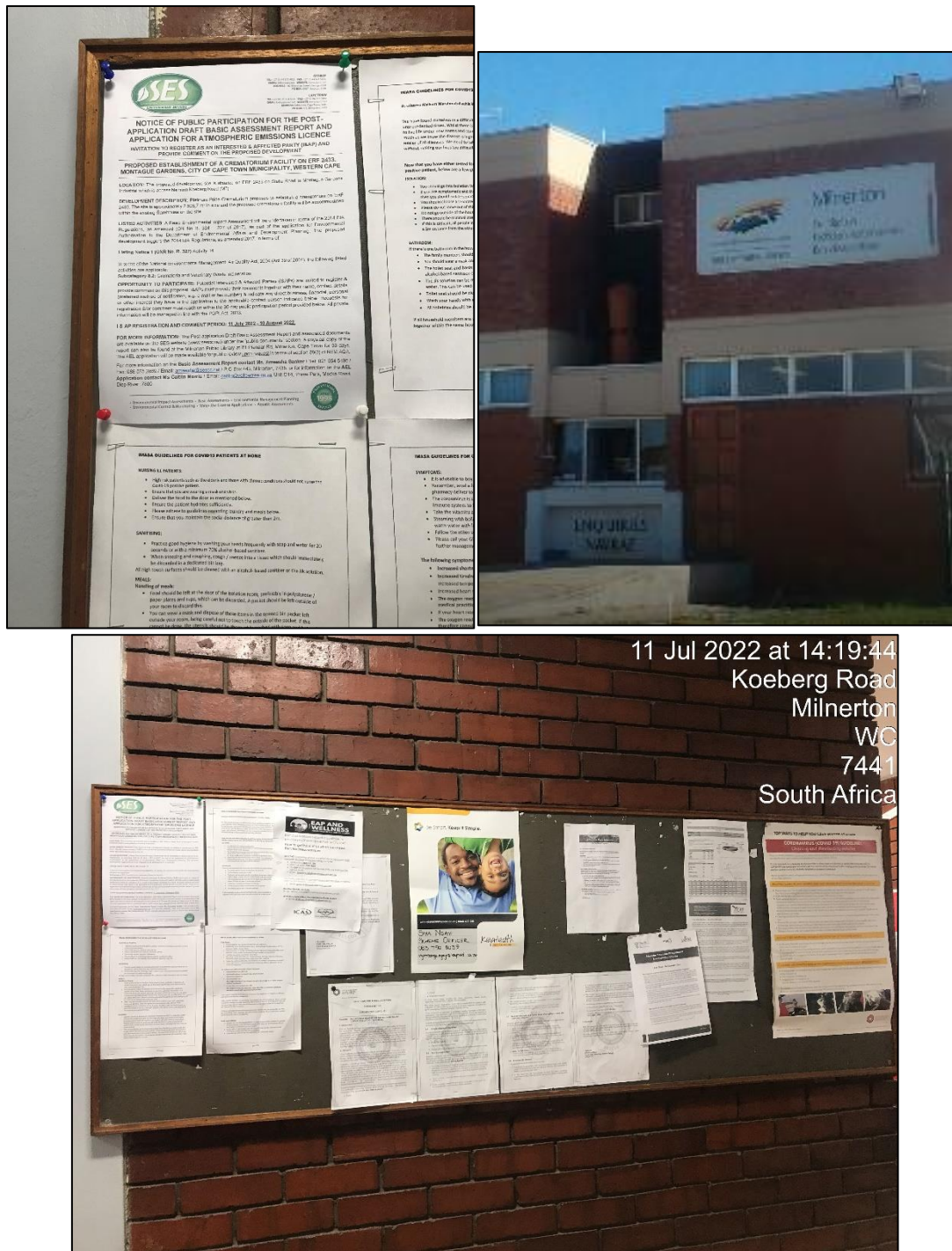


Figure 5: Site Notice at Milnerton Public Library



Figure 6: A4 Site Notice placed at the CoCT Municipal Administrative Offices





### 3) Letter-Drops



**GEORGE**  
TEL: +27 (0) 44 873 4923 FAX: +27 (0) 44 874 5953  
EMAIL: info@sescs.net WEBSITE: www.sescs.net  
ADDRESS: 102 Merriman Street, George 6530  
PO BOX: 9087, George, 6530

**CAPE TOWN**  
TEL: +27 (0) 21 554 5195 FAX: +27 (0) 86 575 2869  
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ADDRESS: Tableview, Cape Town, 7441  
PO BOX: 443, Milnerton, 7435

SES REF: 24/CT/PPLetterDrop/07/22

06<sup>th</sup> July 2022

Dear Land-Owner and/or Occupant,

**RE: NOTIFICATION OF THE 30-DAY PUBLIC PARTICIPATION COMMENTING PERIOD (11<sup>th</sup> JULY 2022 – 10<sup>th</sup> AUGUST 2022) FOR THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (BAR), AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (107 OF 1998) AND THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT (39 OF 2004), RESPECTIVELY.**

**INVITATION TO REGISTER AS AN INTERESTED & AFFECTED PARTY (I&AP).**

Sharples Environmental Services.cc has been appointed by Mr Sybrand Teubes of Ikamva Green Holdings, trading as Platinum Pride Crematorium, to undertake the environmental assessment, in accordance with the National Environmental Management Act, 1998 (Act 107 of 1998), in terms of the Environmental Impact Assessment Regulations, 2014 (as amended 2017), for the Proposed Establishment of a Crematorium Facility on ERF 2433, Montague Gardens, City of Cape Town Metropolitan Municipality, Western Cape.

Yellow Tree (Pty) Ltd, was appointed by Mr Sybrand Teubes of Ikamva Green Holdings, trading as Platinum Pride Crematorium, to undertake the Atmospheric Emission License in accordance with Section 38 of the National Environmental Management: Air Quality Act (Act 39 of 2004), for the proposed development.

In compliance with Chapter 6 of the Environmental Impact Assessment Regulations, 2014 (as amended 2017) and in terms of Section 38 of the National Environmental Management: Air Quality Act (Act 39 of 2004), a 30-day commenting period is hereby undertaken to provide members of the public with an opportunity to provide comment and feedback on the proposed development. As an adjacent landowner/occupier, it is essential that you be notified. If you are not the landowner but are in fact occupying land as a lease/rental, kindly provide the landowners contact details to the EAP, as per the contact details below. If you are the landowner, kindly indicate this to the EAP and advise who the occupier is.

**PROPOSED DEVELOPMENT**

The proposed development site is situated in Montague Gardens on ERF 2433. The site is located approximately 12 km northeast of Cape Town central. The site is located on Stella Road in Montague Gardens Industrial which is accessible from Koeberg Road (M5).

- 
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The site is approximately 2 506,7 m<sup>2</sup> in size and is zoned as General Industry Subzone GI1. The site contains existing infrastructure and has been transformed significantly, resulting in minimal environmental sensitivities being present on site. The proposed scope of works includes the renovations/refurbishment of the existing warehouse, to accommodate the following:

- Installation of 6 x BA2 Cremators and associated infrastructure.
- LPG tanks (fuel source for cremators) of a combined capacity of 80m<sup>3</sup>.
- 6 x Chimney stacks approximately 0.35m in diameter, and approximately 6m's above the nearest building.
- Three reefer refrigerators and one cool room.
- Superficial modifications to the interior and exterior of the existing warehouse.
- Associated infrastructure and services.

The existing warehouse facility will be refurbished, however, all activities will be contained within the site, and will not exceed this footprint.

#### **LISTED ACTIVITIES AND APPLICABLE APPLICATIONS**

A Basic Environmental Impact Assessment will be undertaken in terms of the 2014 EIA Regulations, as amended (GN No R. 324 – 327 of 7th April 2017), as part of the application for Environmental Authorisation to the Department of Environmental Affairs and Development Planning. The proposed development triggers the following "listed activities" in terms of the 2014 EIA Regulations, as amended 2017:

- **Listing Notice 1 (GNR No. R. 327) Activity 14.**

In terms of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), the following listed activities are applicable for the AEL application:

- **Subcategory 8.2:** Crematoria and Veterinary Waste Incineration

Description and application: Cremation of human remains, companion animals (pets) and the incineration of veterinary waste. All installations.

#### **OPPORTUNITY TO PARTICIPATE IN THE PUBLIC PARTICIPATION PROCESS**

As an adjacent landowner/occupier, you are hereby notified of the public participation process commencing on **the 11<sup>th</sup> July 2022 and will conclude on the 10<sup>th</sup> August 2022**, for the applications for Environmental Authorization and application for an Atmospheric Emission Licence. You are invited to register on the database of Interested & Affected Parties (I&APs) for this project. Registered I&APs will have an opportunity to comment on the proposed development in accordance with the documents compiled for public comment and will be kept informed of the progress and outcome, of the assessment.

You are further notified that the Report for the above-mentioned project will be available for review and comment for a period of **30-days from 11<sup>th</sup> July 2022 to 10<sup>th</sup> August 2022**. You are hereby invited to submit any comments (positive or negative), you may have on the proposed project and associated applications. Any interested party is entitled to submit comments, and all submitted comments will be taken into consideration during the process. All private information will be managed in-line with the POPI Act, 2013 (as attached letter).

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You are also requested to notify all occupants on your property about the above-mentioned proposed development, the Post-application Draft Basic Assessment Report that will be undertaken, and the availability thereof for review and comment.

#### **MORE INFORMATION**

Further information about the proposed project and the process can be obtained from SES (contact details below) or found in the Draft Basic Assessment Report and associated documents, which can be downloaded directly from the SES website ([www.sescc.net](http://www.sescc.net)) under the "public documents" section. A physical copy of the document can be found at the Milnerton Public Library at 81 Pienaar Rd, Milnerton, Cape Town.

The AEL application will be made available **for public review upon request** in terms of section 38(3) of NEM:AQA. **You are advised to make a request to Ms Caitlin Morris, to obtain a copy of the AEL application.**

Please contact SES should you have any difficulty in accessing the report, or if you have any questions relating to this proposed project.

#### **HOW TO COMMENT OR REGISTER AS AN INTERESTED PARTY**

To register as an Interested & Affected Party and/or to submit:

- Your comment/s;
- Your full name;
- Your contact details;
- Your preferred method of contact;
- An indication of any direct business, financial, personal or other interest which you may have in the application.

#### **Draft Basic Assessment Report comments must be directed:**

##### **Ms Ameesha Sanker**

Sharples Environmental Services cc.

Tel: 021 554 5195 | Fax: 086 575 2869 | email: [ameesha@sescc.net](mailto:ameesha@sescc.net) (preferred) | Post: P.O. Box 443, Milnerton, 7435

#### **Air Emissions License comments must be directed:**

##### **Ms Caitlin Morris**

Yellow Tree

Tel: 083 566 2552 | email: [caitlin@yellowtree.co.za](mailto:caitlin@yellowtree.co.za) | Post: Unit D14, Prime Park, Mocke Road, Diep River, 7800

Please note that written comments must be received by Sharples Environmental Services **on or before Wednesday, 10<sup>th</sup> August 2022**, to be taken into consideration. Please also note that correspondence throughout the remainder of the process will be distributed to **only Registered I&APs**, and you are therefore encouraged to register on the I&AP database if you have an interest in this project.

By submitting a comment, you have automatically provided:

- Consent to be registered as an I&AP.
- Consent to our use of your personal information in terms of the POPI Act, for all legislated Environmental Processes related to this project.

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Please Note: As per the accompanying Personal Information Consent document detailing the Terms and Conditions, when registering as an I&AP, you consent to the lawful processing of your personal information in relation to the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your information will only be used for regulated processes within this project. You also agree that by submitting a comment to inform this process, your personal information may be shared with the competent authority for consideration, decision-making and may be used for any processes related to this project, as deemed necessary by the competent authority and applicable legislation.

**I&AP REGISTRATION AND COMMENTING PERIOD: 11<sup>th</sup> July 2022 – 10<sup>th</sup> August 2022.**

Do not hesitate to contact us should you have any queries or require any further information.



Kind Regards,

**Ameesha Sanker**

Senior Environmental Assessment Practitioner

Sharples Environmental Services cc.

Tel: 021 554 5195 | Fax: 086 575 2869 | email: Ameesha@sescs.net | Post: P.O. Box 443, Milnerton, 7435

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## CONSENT TO PROCESS PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 of 2013

By choosing to register as an Interested and Affected Party, hereinafter referred to as the "I&AP", you provide consent as per the Terms and Conditions detailed below, in line with the Protection of Personal Information Act, 2013 (Act no. 4 of 2013), in accordance with the purpose/s detailed in Point 1 below.

### 1 PURPOSE

The purpose of this consent to Sharples Environmental Services CC (the "CC") is to enable them to perform and carry out the legislated environmental process and any mandatory processes, such as but not limited to, an appeal in terms of the National Appeal Regulations, 2014.

### 2 ACKNOWLEDGEMENT AND CONSENT

I, the I&AP:

- 2.1 hereby acknowledge and accordingly consent that the CC may from time to time, collect my Personal Information in my capacity as an I&AP, and which Personal Information, the CC may collect, store, use, delete, destroy, outsource, transfer or otherwise process, as the context and circumstances may require and as contemplated in terms of POPIA for the duration of my relationship and mandate with the CC, as well as thereafter, as may be required by applicable law.
- 2.2 understand that my privacy is important to the CC and that the CC will use reasonable efforts in order to ensure that any Personal Information in their possession or processed on their behalf is kept confidential, stored in a secure manner and processed in terms of POPIA and South African law.
- 2.3 acknowledge that any Personal Information supplied to the CC is provided on a voluntarily basis and that the CC may not be able to comply with its obligations if my correct and up-to-date Personal information is not supplied to the CC.
- 2.4 hereby acknowledge that I voluntarily provide the CC with my Personal Information and consent to the CC collecting, disclosing, and processing the Personal Information:
  - 2.4.1 For the purpose set out in clause 1 above; and
  - 2.4.2 To carry out their mandate and any ancillary process.
- 2.5 hereby acknowledge and confirm that I understand the purpose for which the CC may collect, store, use, delete, destroy, outsource, transfer or otherwise process, as the context and circumstances may require and as contemplated in terms of POPIA, my Personal Information as set out herein
- 2.6 hereby acknowledge that the purpose of, as well as the meaning and extent of the disclosure of my Personal Information by the CC as contemplated herein, have been explained to me in easy and understandable terms.

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- 2.7 hereby further acknowledge and accordingly consent that the CC may from time to time outsource the processing of my Personal Information to third party operators and Authorities, such as Environmental Departments, as required by Environmental Legislation in accordance with the relevant provisions of POPIA for the purposes set out herein and otherwise in accordance with my relationship and mandate with the CC (to the extent applicable).
- 2.8 hereby further acknowledge and accordingly consent that the CC may make my Personal Information available to an appellant in the case of an appeal, and to an applicant/ third party environmental practitioner/ independent person for purposes of being informed and giving access to an audit report, as required by Environmental Legislation and the National Appeal Regulations in accordance with the relevant provisions of POPIA for the purposes set out herein and otherwise in accordance with my relationship and mandate with the CC (to the extent applicable).
- 2.9 hereby acknowledge and accordingly consent that my Personal Information may be collected for purposes as required in terms of my relationship with the CC and as may be necessitated by the circumstances, or as otherwise required by law, and such Personal Information shall only be processed by the CC or an authorised third party operator for purposes relating to the aforesaid relationship, or any other third party where required in terms of applicable law, or where any additional information not incidental to the aforesaid relationship (if applicable) is processed by the CC in accordance with the circumstances, upon my prior consent.
- 2.10 acknowledge that I shall be entitled to request reasonable access to my Personal Information held by the CC, in accordance with sections 23 and 24 of POPIA, as well as the correction, reduction or deletion thereof, as the relevant circumstances may require.

### 3 INDEMNITY

I, the I&AP, herewith indemnify and hold harmless the CC from any action or claim of any nature whatsoever that might be brought by any person whatsoever against the CC as a result of any personal loss, injury or damage arising directly or indirectly from any act or omission on my/our part relating to or incidental to the failure from my/our part to honour the above provisions, or otherwise, as the case may be.

### 4 DECLARATION

I, the I&AP:

- 4.1 declare that all information that I have provided to the CC is true and correct and that I voluntarily provide such information for the purposes set out herein. I further voluntarily consent thereto that the CC may process such Personal Information in order to carry out and give effect to their mandate.
- 4.2 undertake to inform the CC of any change of my identifying information and/or contact details.
- 4.3 hereby confirm that I understand the nature and extent of the informed consent described and granted herein and further confirm that I intend to be bound fully by the aforesaid informed consent, in confirmation of which I do hereby duly sign and attest to this Consent Form.

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Figure 8: Letter Drop Notification

### **3.1. Occupiers and Landowners Present**

In accordance with regulation 41 (2) (b) of the EIA Regulations, 2014 (as amended 2017), written notice Figure 8 was given to the owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken.

Refer to the list below, the register was signed for the companies and organisations where letter drops were directly delivered to the occupiers or owners of such premises on 06 July 2022.

AZE Motortrim
Bathrooms Exquisite
Blaawberg Meat Specialities
Carburettor and Fuel Injection Services
CCR Designs/World of Gas
Cecil Penny Racing (MX24)
CJ Supplies
C-Tech Precision Automotive
Delo - Industrial Technical Trading cc
DIY Cupboards
Ecom Light
Flexi-covers
Fresh Loaf Bakery
Godwin Auto Electrical
House of Cleaning
Improvon
Kenter Metals
MDX Designs
Mechanical Concepts
MIMIC Cape
Multiquip
Outdoor Power
Pletteng
PRK Design and Manufacturing
Pump Centre
Robot SPS
Safara Food Corner
Stella Cove Takeaways
Stoos Customs
Sunsails
Ultra Cod Technologies (All Types Welding)
Urbansky Signs and Graphics
Visual Multi Service Group
Xmoor Trans

### **3.2. Letter-drops – No Occupiers and Landowners Present**

Figure 9 below shows the images taken on site on 06 July 2022, the following premises are located on the adjacent properties. Upon a site visit, the occupiers/tenants were not present, as such a notice letter was inserted into the letter box of the door.

#### **3.2.1. ERF 4510**







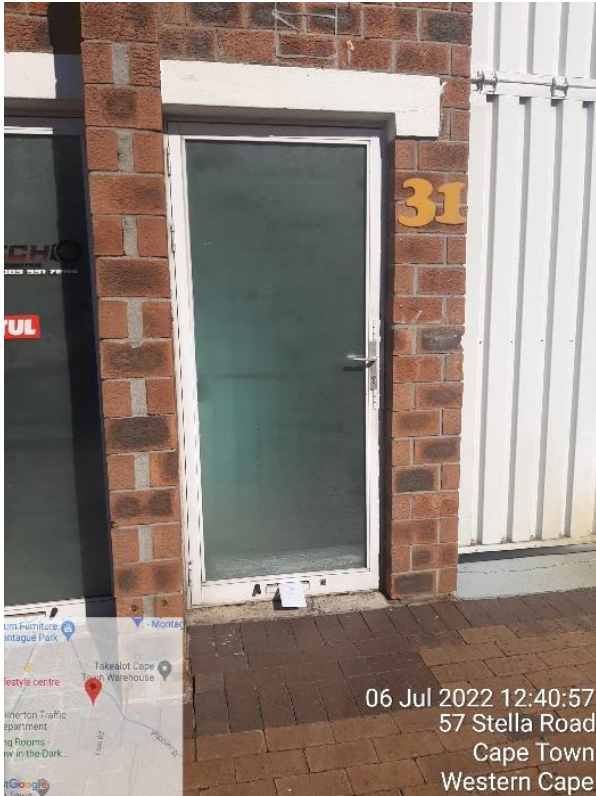
















06 Jul 2022 12:48:38  
Cape Town  
Western Cape



06 Jul 2022 12:49:29  
Stella Road  
Cape Town  
Western Cape



06 Jul 2022 12:49:58  
Stella Road  
Cape Town  
Western Cape



06 Jul 2022 13:32:42  
Montague Gardens  
City of Cape Town  
Western Cape



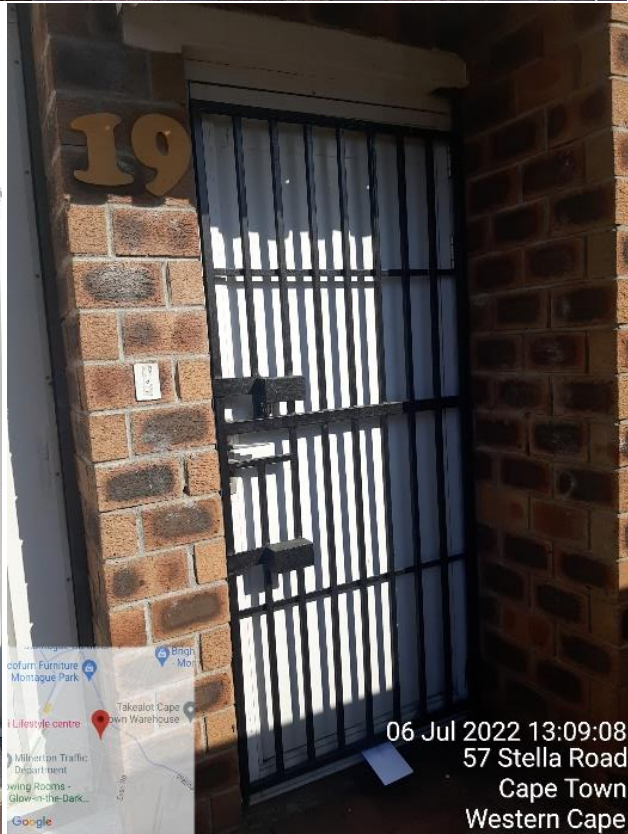






Figure 9: Letter Drops at Unoccupied Premises on ERF 4510

#### **4) Other I&AP Correspondence Methods**

##### **4.1 Alternative correspondence with adjacent landowners and/or occupiers**

The table below lists adjacent companies present on site. As stipulated in the notification letter (Figure 8), should the person/s present on the adjacent properties not be the landowner they were requested to kindly provide the landowner contact details to the EAP. If the landowner was present on the adjacent properties, they were requested to indicate this to the EAP and notify all occupants on their property about the proposed development and the availability of the Basic Assessment Report for review and comment.

ERF	CONTACT PERSON	METHOD OF NOTIFICATION	CORRESPONDANCE
Erf 2475 SG Code: C01600360000247500000	Occupier: Kenter Metals	Letter drop	The landowner was not present on site. The occupier stated they would provide the letter to the landowner. The occupier would not provide the contact details for the landowner to the EAP.
Erf 2434 SG Code: C01600360000243400000	Occupier: Godwin Auto Electrical	Letter drop	Occupier stated they would provide the letter to the landowner.
ERF 36507 SG Code: C01600340003650700000	Landowner: Improvon	Letter drop	Occupiers stated they would provide the letter to the occupier.

##### **4.2 State Departments and Organs of State**

In accordance with regulation 40 (2)(a-c) of the EIA regulations, 2014 (as amended 2017), State Departments and Organs of State were notified about the proposed development via electronic mail. Proof of this is included in Appendices E and Appendix F1 of the Basic Assessment Report Attachments. Mr Theron of City of Cape Town did advise that all correspondence be sent via their Environmental Department (Appendix A).

##### **4.3) Air Emission Licence Application Comments**

Potential Interested and Affected Parties were invited to comment on the Air Emission Licence application by directing their comment(s) to the Air Emission Licence specialist Ms Caitlin Morris of Yellow Tree. Their public participation ran for a period of 30 days from 15 July 2022. The comments will be included as part of the Comments and Responses Report as attached to the Basic Assessment Report in Appendix F2

#### **5) Newspaper Advert**


In compliance with Regulation 41(2)(c) of the EIA regulations 2014 (amended 2017) an advertisement inviting interested and affected parties to register for comment was placed into one local newspaper, Tabletalk, the advert was published on the 06<sup>th</sup> July 2022 (Figure 10). Additionally, Yellow Tree Air Emission Specialists, placed an advertisement in the Cape Times newspaper on the 15 July 2022 (Figure 11).



# Tabletalk Classified

Advertising booking deadline: Tuesday 10:45 am

<p><b>MISCELLANEOUS</b></p>	<p><b>202</b></p>	<p><b>MISCELLANEOUS SALES</b></p>	<p><b>CASH</b> for good used clothes Min 60 items Ph 092 3829778</p>	<p><b>607</b></p>	<p><b>WORK WANTED (UNEMPLOYED)</b></p>	<p><b>HI/KEEPER or nanny.</b> I am avail Mon - Fri Veldah 0618282728</p>	<p><b>602</b></p>	<p><b>GENERAL DISPLAY</b></p>
<p><b>sewing machine needed!</b></p>	<p><b>602</b></p>	<p><b>With CLASSIFIEDS</b> you can buy and sell your goods anytime, anywhere.</p>	<p><b>To advertise, please call</b></p>	<p><b>021 488 4865</b></p>	<p><b>GENERAL DISPLAY</b></p>	<p><b>602</b></p>	<p><b>GENERAL DISPLAY</b></p>	<p><b>602</b></p>
<p><b>SERVICE GUIDE</b></p>	<p><b>607</b></p>	<p><b>All Electrical &amp; Electronics</b> Installations &amp; Repairs Sockets, geyzers, lighters, pool pumps &amp; DB's, air motors, C.C.T.V., fridges, aircons, etc. For a free quote please Mailbox 083 258 6888</p>	<p><b>602</b></p>	<p><b>GENERAL DISPLAY</b></p>	<p><b>602</b></p>	<p><b>GENERAL DISPLAY</b></p>	<p><b>602</b></p>	<p><b>GENERAL DISPLAY</b></p>
<p><b>LOOKING FOR ANTIQUES?</b></p>	<p><b>607</b></p>	<p><b>To advertise your action please call</b></p>	<p><b>021 488 4865</b></p>	<p><b>GENERAL DISPLAY</b></p>	<p><b>602</b></p>	<p><b>GENERAL DISPLAY</b></p>	<p><b>602</b></p>	<p><b>GENERAL DISPLAY</b></p>

 Western Cape  
Government

FOR YOU

Health and Wellness

**EXCITING OPPORTUNITY FOR PEOPLE WHO WANT TO MAKE A  
DIFFERENCE**

DEPARTMENT OF HEALTH AND WELLNESS  
NEW SOMERSET HOSPITAL  
**CLINICAL PROGRAMME COORDINATOR: GRADE 1 (PMTCT)**  
Remuneration: R450 939 (PN-A5) per annum

To view the advertisement content and how to apply, please visit [www.westerncape.gov.za/jobs](http://www.westerncape.gov.za/jobs)

## Looking for Courier Services?

**NOTICE OF 30-DAY PUBLIC PARTICIPATION COMMENTING PERIOD FOR THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (BAR) AND APPLICATION FOR ATMOSPHERIC EMISSIONS LICENCE INVITATION TO REGISTER AS AN INTERESTED & AFFECTED PARTY (I&AP) AND COMMENT ON THE PROPOSED DEVELOPMENT.**

**PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY, WESTERN CAPE.**

Notice is hereby given in terms of regulation 41 of Government Notice No. R326 under the National Environmental Management Act (Act 107 of 1998), in terms of the EIA Regulations, 2014, (as amended 2017), of the intent to submit an application for Environmental Authorisation to the Department of Environmental Affairs and Development Planning.

Notice is hereby given in terms of Section 38(3)(b) of the National Environmental Management Planning Act (Act 39 of 2004), as amended (NEMA-AO), to invite interested parties to register comments with regards to an application for an Atmospheric Emissions Licence (AEL) in terms of Section 37 of NEMA-AO, to the City of Cape Town Metropolitan Municipality.

**PROPOSED DESCRIPTION OF ACTIVITY & LOCATION:**

The proposed activity is to establish a crematorium facility on Erf 2433. The site is accessible off of Stalls Road in Montague Gardens Industrial Estate, Cape Town (CMT). The site is a brownfield site and is transformed. The existing warehouse on site will be refurbished to accommodate the crematorium and associated infrastructure.

**LISTED ACTIVITIES:**

The National Environmental Management Act Act 107 of 1998), EIA Regulations, 2014, (as Amended 7th April 2017): Listing Notice 1 (GNR No. R. 277 Activity 14).

The National Environmental Management Act: Air Quality Act, 2004 (Act 39 of 2004), the following listed activities are applicable for the AEL application: **Subcategory 8.2: Crematoria and Veterinary Waste Incineration.**

**OPPORTUNITY TO REGISTER AS AN I&AP:**

Interested and Affected Parties (I&APs) are invited to register & provide comment on this proposal. I&APs must provide their comments before the closing date. Interested parties must provide their name, contact details (preferred method of notification, e.g., e-mail or fax number) & indicate how they wish to be contacted. Comments must be submitted in writing and must be received by the City of Cape Town below, within 30-days from 11 July 2022. Requested comment must be received by the City of Cape Town on or before 10 August 2022. All information will be managed within the mandate of the POPI Act, 2013.

**AVAILABILITY OF REPORT:**

The Post-application Draft Basic Assessment Report (BAR) and associated documents are available for 30-days on the SES website ([www.sesac.net](http://www.sesac.net)) under the "public documents" section. A physical copy of the report can also be found at the Miterrion Public Library at 81 Pieter Rd, Milnerton, Cape Town.

The AEL application will be made available for public review upon request in terms of section 38(3) of NEMA-AO.

**BAR contact person: Ms. Amnesha Samkar**  
**Bar contact person: Ms. Caitlin Morris**  
 Email: [amnesha@sesac.net](mailto:amnesha@sesac.net)  
[caitlinm@cityofcape.gov.za](mailto:caitlinm@cityofcape.gov.za)  
 Unit D14, Prime Park, Moske Road,  
 Deep River, 7800

**TENDERS**

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## PROTEST

## Address fuel prices or face shutdown, taxi bosses tell officials

OWA MENTANE  
o.mentane@iain.co.za

THE National Taxi Associations (NTA) have given the government 21 days to address the skyrocketing fuel prices or face a national shutdown.

During a media briefing yesterday, the United Taxi Association (UTA), an affiliate of the NTA, announced that taxi fares would increase in Gauteng by R10, starting today.

UTAF spokesperson Sipho Nkanyana Nkanyana said taxi associations were left with no option but to

increase fares for their members to be able to survive.

The taxi industry for decades carried the South African commuter by way of charging a small amount in terms of fares in international standards.

"We have persisted to do even under the most trying circumstances."

"Fast forward to 2022, the first and second quarter, is where the trouble started to escalate out of control."

"We, as the taxi industry, as a matter of principle only increase taxi fares

as the last resort."

NTA spokesperson Theo Malele said the government wasn't prepared to listen to them and there had been no progress on negotiations.

"We are currently going with both consultations which are with taxi associations and the government and we are also going to perhaps write to the government again and give them a maximum of 21 days."

"If they do not respond, we are going back to our masses (to seek a way forward)."

"Our demands to the government are that the petrol price is too high and

they must do something about that."

What we think can be done is the relaxation of taxes on fuel," said Malele.

Transport Minister Fikile Mkhabela's spokesperson Thabiso Molekwa yesterday said the department wasn't aware of any planned or scheduled shutdown.

The minister will be having a meeting with the South African National Taxi Council (Santaco) following their first meet and greet that took place last week.

All parties have agreed to have a joint meeting that seeks to address the

challenges that have been expressed by the taxi associations.

Therefore, all other challenges have been put on the table as an agenda item and will be discussed at the meeting that is due to take place in the upcoming week.

"It's quite premature at this point in time for us to give comment when the NTA because the negotiation and conversations are still currently ongoing," said Mkhabela.

The Santaco national spokesperson, Thabiso Molekwa, didn't respond to requests for comment by deadline yesterday.



KHAYELITSHA residents have been left in limbo while the only Sassa office in the area closed without notice yesterday. | AYANDA NDAMANE  
African News Agency (ANA)

## GRANTS

## Sassa fails to inform clients about closure

OKUKHE HEATI  
o.menti@iain.co.za

KHAYELITSHA residents and community structures have called for heads to roll at the South African Social Security Agency (Sassa) Western Cape's top management over carelessness following its failure to make alternative arrangements for operations after knowing three months in advance that their office would be closed for renovations.

A number of elderly and vulnerable grant recipients braved the cold, wet weather yesterday in the hope of being assisted, only to be met with a notice that the office had been closed.

What angered residents was that officials failed to inform them timely. They will now have to travel to Mitchell's Plain and as far as Cape Town for assistance.

"When we arrived earlier, there was no notice and even the phone num-

bers they issued on the papers are not being through, said a Sassa resident.

No other form of communication was used, so many more people will still waste their time and money and come here.

"This is utterly nonsense. Serious intervention are needed here because their service has always been poor," said Nonnyiso Majeke.

Sassa has been "squinting" in the Department of Social Development's (DSD) office for more than a decade, with more than 100 workers slating a small space.

The Cape Times reported last year about the shocking scenes of the elderly and vulnerable sleeping in the cold outside the Sassa office after the agency yet again failed to secure an additional office facility.

Provincial Sassa spokesperson Sherrin Wabwah said since March, Sassa has been working towards identifying

suitable alternative accommodation to enable services in Khayelitsha to continue.

"To date, Sassa has also contacted the Sub Council 10 to assist with the identification of alternative accommodation."

"The arranged engagement with the management of VPUU (Violence Prevention through Urban Upgrading) was on June 14."

"Sassa has further submitted the necessary documents for the application for sub-council 20 offices located at Kuyasa Library and is currently awaiting feedback."

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## ECONOMY

## Cost of living: battle to keep head above water

CHEVON BOOSEN  
chevon.boozen@iain.co.za

THE working class have had to make drastic lifestyle changes to keep abreast with a cost of living crisis, described as a "global phenomenon."

Citizens have been feeling the pinch with rising costs of groceries, fuel and transport, with some having to spend more than half of their salaries on transport to get to work.

Call centre employee, Lynton Smith, said his salary only barely covered his monthly expenditure.

"It's becoming really tough to see through the month even though you try to budget."

Everything has just become too expensive and even if you try to cut down on the niceties you used to be able to enjoy, it still hardly helps in keeping head above water because everything is expensive.

I can't think of giving up my job because I have debt that must be paid, and a family to take care of, but it seems that it is all your money goes towards - the very basic costs are covered with a meagre salary that just doesn't match what it costs to live in this country nowadays."

Costs are spiralling and we are struggling yet we are the working class bringing big bucks to the coffers of those who say rich," said Smith.

National Union of Metalworkers of South Africa (Ntuma) spokesperson, Phumile Molekwa, said a short-term solution would be to increase the current minimum wage to a living wage so citizens could recover from financial and employment challenges.

A living wage should be defined according to your expenses.

A living wage is based on your monthly expenditure.

We should also have subsidies such as transportation subsidies so that workers are not using up more than 50% of their salaries just to get to work.

"And that means that public transportation in this country must be highly subsidised so that ordinary

workers and their families are not spending three quarters of their salaries just on transportation to get to places of employment."

"We need an ideological long-term reform."

It really really want to radically change the lives of the working class of South Africa, then you must nationalise the minerals and mines.

"That mineral wealth can pay for free quality education and free quality healthcare."

Right now the economy is geared towards benefiting only the few who get richer and richer while everyone else gets poorer," said Molekwa.

She said the union had always fought for above inflation wage increases for the working class and the union had "rejected the narrative" that workers must earn salaries in line with inflation or below inflation.

Expert economist, Matthew Ocean, said the current cost of living crisis was a global phenomenon.

Anyone who follows international news would have noticed the agitations and social unrest, even in the rich countries of the Global North.

"These concerns are a result of the fast pace at which prices of goods and services are rising."

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## LOAD SHEDDING

## 'Eskom is failing South Africa dismally'

SIPHOKAZI VUSO  
siphokazi.vuso@iain.co.za

A NUMBER of residents have raised frustrations that while they grapple with the fourth consecutive week of load-shedding, their electricity bills remain the same.

Eskom announced this week that load-shedding would continue.

Stop CoC1 founder Sandra Dickson said many households were living in despair.

"Basically the cost of living increased significantly overnight and it is now a question of balancing a family's needs between food, electricity and paying bills. Those who can get credit are piling up even more debt because they are forced to make short term loans at micro lenders just to be able to put food on their table. Residents who are charging batteries report an increase in their daily electricity units consumed."

"Others report an increase in usage of electricity. This added spike may be caused by home appliances starting up when the electricity returns after load-shedding."

"Those that wait out load-shedding periods are experiencing a slight decrease in electricity units used per day," she said.

It is therefore clear that the incredible transition to renewables will be more than painful because the haste at which it is advocated and enforced is not keeping track with the implementation and limitations of renewable solution.

"Eskom is failing South Africa dismally and a switch to renewables is not going to happen in only a few months. We are talking about years. The root of this is continued gross mismanagement, corruption and incompetence at Eskom."

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**NOTICE**

IN TERMS OF THE PROVISIONS OF SECTION 32(1) OF THE WESTERN CAPE GAMBLING AND RACING ACT, 1996 (ACT 4 OF 1996) ("THE ACT"), AS AMENDED, THE WESTERN CAPE GAMBLING AND RACING BOARD HEREBY GIVES NOTICE THAT THE FOLLOWING APPLICATION FOR A BROADCASTING PERMIT, AS PROVIDED FOR IN SECTIONS 27(1) AND 28(1) OF THE ACT HAS BEEN RECEIVED:

Applicant for a new broadcast permit: **Betting World P/L**  
Business address: **A South African registered company**

Registration number: **2000/00048/07**

Business address of proposed broadcaster premises: **3 Mazon Road, 7500**

Est. number: **17081**

Section 32 of the Western Cape Gambling and Racing Act, 1996 (hereinafter "the Act") requires the Western Cape Gambling and Racing Board (hereinafter "the Board") to use the public to submit comments and/or objections to proposed applications that are filed with the Board. The Board of Gambling and Racing is required in terms of the Act and the National Gambling Act, 2004, to make every effort to ensure that the public has an opportunity to be heard and to be heard in a timely manner. The Board is therefore inviting the public to submit comments and/or objections to the proposed application on or before the closing date of the below-mentioned address and contacts. Since the proposed application is a legitimate business operation, your objections or your support for the application will not be considered by the Board, as the Board is required to make every effort to ensure that the public has an opportunity to be heard and to be heard in a timely manner. 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## 6) Hard Copies Distributed for Public Viewing

In accordance with regulation 41 (6)(a) and (b) of the EIA regulations 2014 (amended 2017) the EAP's were required to ensure that all information containing all relevant facts in respect of the proposed application is made available to potential I&AP's. A hard-copy of the Draft Basic Assessment Report was made available at the Milnerton Library for public I&AP's to view should they wish to (Figure 12). The document was made available for viewing for the duration of Public Participation (11 July 2022 – 11 August 2022).

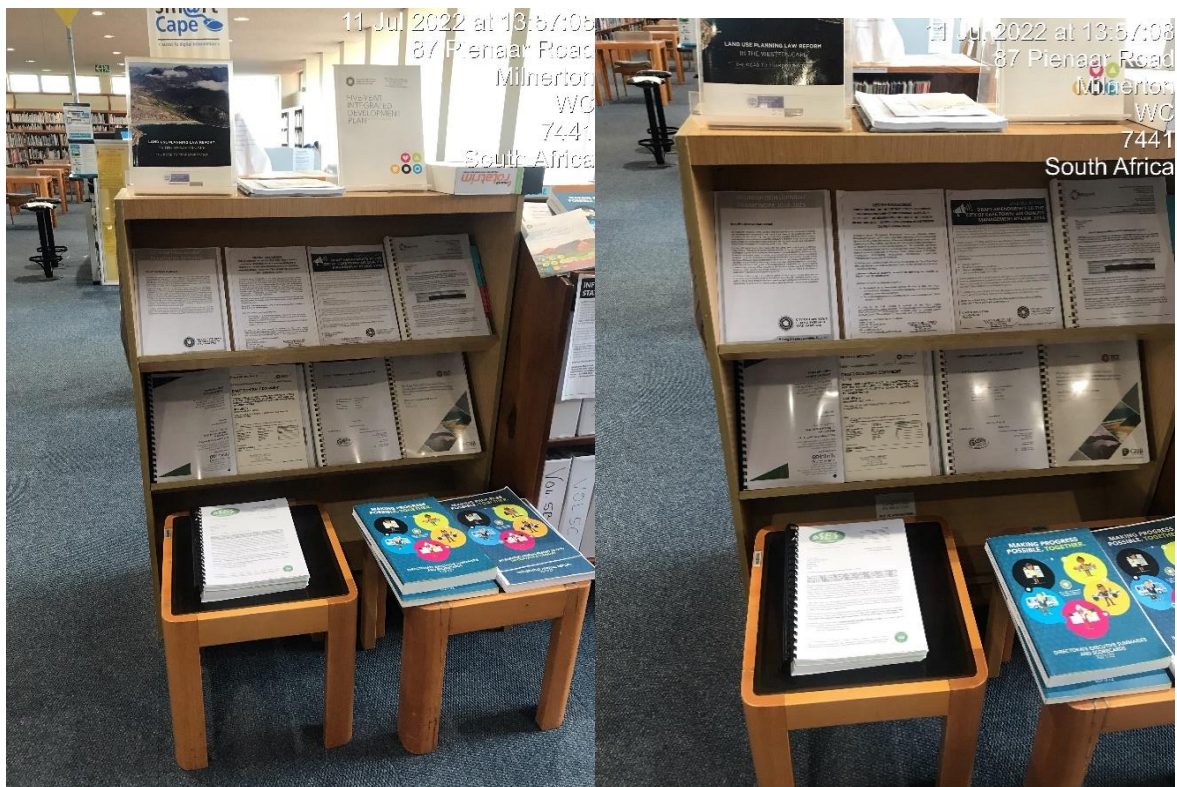


Figure 12: Hard-Copy Draft Basic Assessment Report made available at the Milnerton Public Library

## 7) Social Media Notifications

In line with regulation 41 (6) of the EIA regulations 2014 (amended 2017), notifications of the proposed public participation period was posted onto the SES Facebook page (Figure 13), LinkedIn page (Figure 14) and Sharples Environmental Services cc. website (Figure 15) for public notification, on Monday the 11<sup>th</sup> of July 2022.

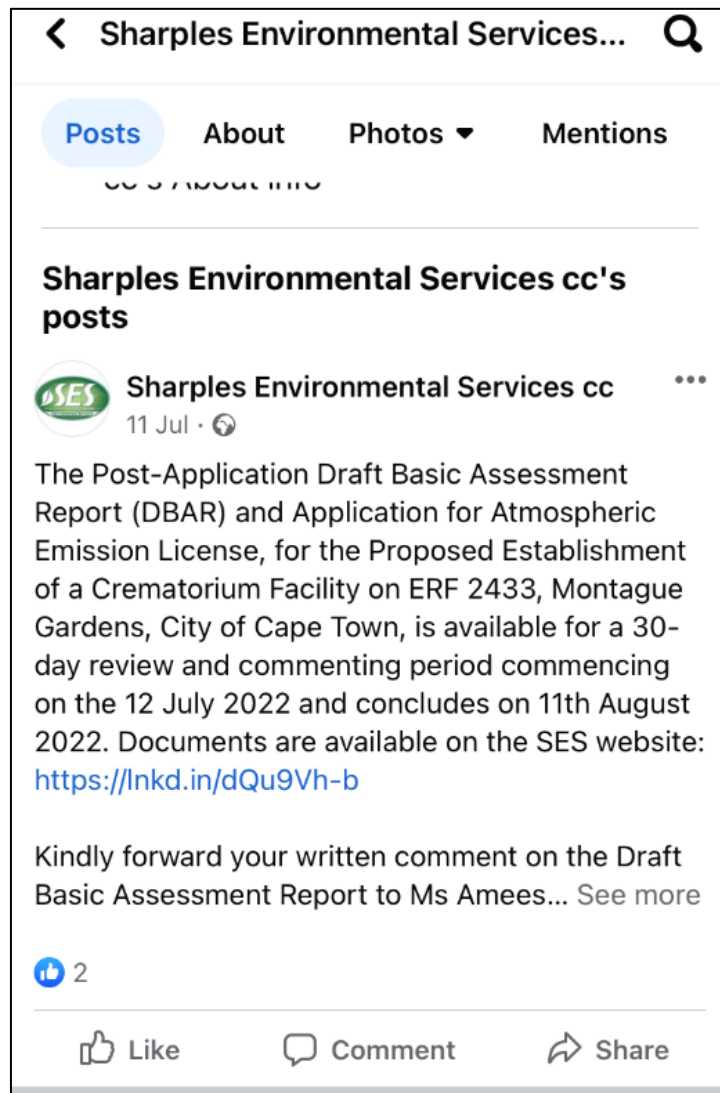


Figure 13: Social Media Facebook Page Notification



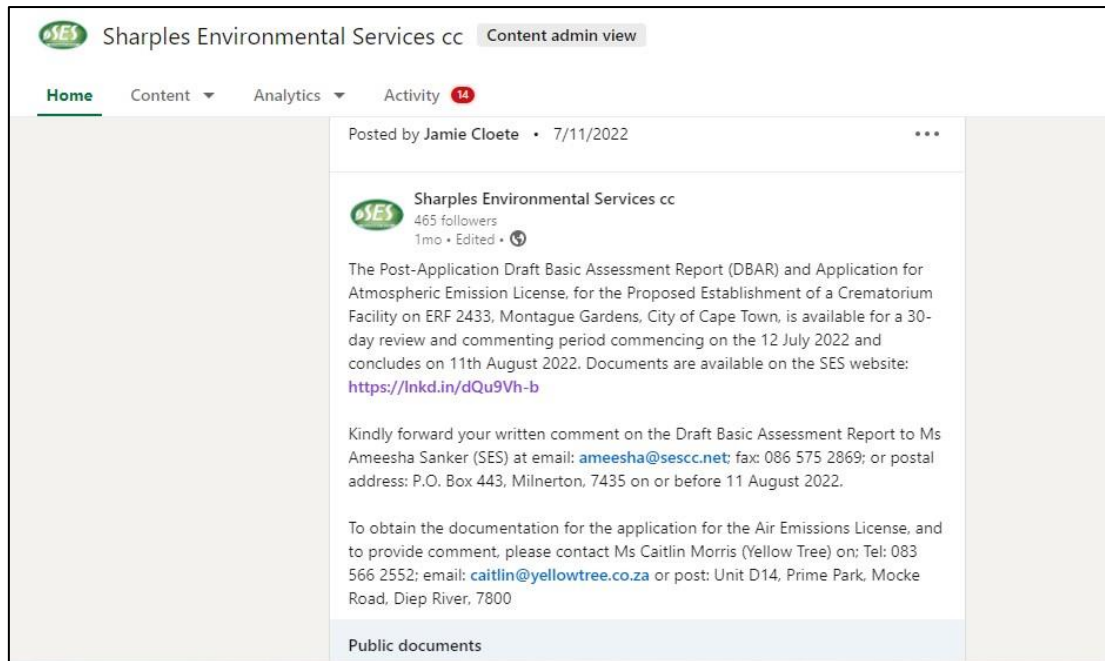


Figure 14: Social Media LinkedIn Page Notification

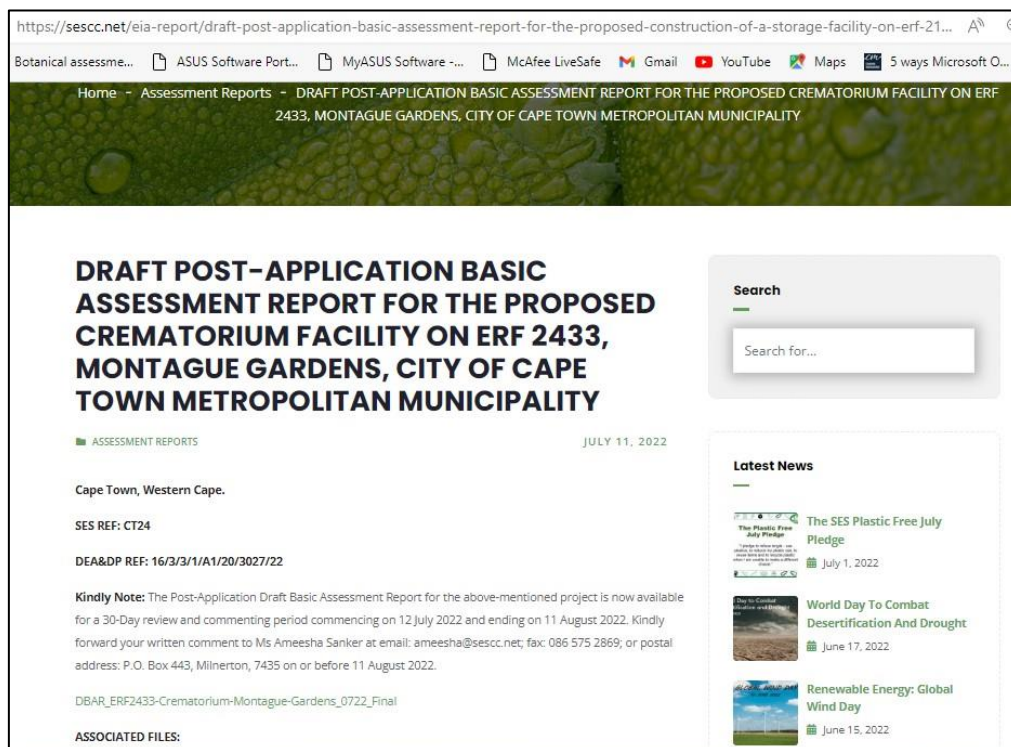


Figure 15: Social Media SES Website Notification

## 8) Other Measures Undertaken

In accordance with regulation 41(2)(e) of the EIA regulations 2014 (as amended 2017), if an I&AP notifies the EAP of any issues in relation to obtaining the document etc. The EAP will take all necessary steps to ensure that I&AP is provided the necessary assistance. The EAP was not made aware of any issues in relation to obtaining the documents etc. during the public participation process.

Appendix: A

City of Cape Town electronic mail correspondence

## APPENDIX D: COMMENTS & RESPONSES TABLE

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**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
<b>STATE DEPARTMENTS</b>					
1.	Reference is made to the above-mentioned document dated 02/06/2022 DEA&DP Ref: 16/3/3/1/A1/20/3027/22  This Department has perused the submitted application and has the following comments:  1. According to the report, a riparian watercourse was identified outside the northern boundary of the study area. Furthermore, the proposed refurbishment must not go beyond the footprint of the existing facility, if this is unavoidable this Department must be informed, and the relevant authorisation must be applied for.	03 <sup>rd</sup> August 2022	Ms Ndobeni	National Department of Water and Sanitation Berg - Olifants WMA	Thank you for your comment, it is noted. It has been included in the mitigation tables, of both the BAR and EMPr, that should the refurbishment extend beyond the existing facility footprint, the National Department of Water and Sanitation Berg - Olifants WMA
2.	2. No abstraction of surface or groundwater may be done, or storage of water be created without prior authorisation from this Department, unless it is Schedule 1 or Existing Lawful use as described in the National Water Act 1998 (Act No. 36 of 1998).				Thank you for your comment, it is noted. This has been included in the mitigation tables of the BAR (Section H) and EMPr (Section 10)

**APPENDIX D: COMMENTS AND RESPONSE TABLE****COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
3.	3.No surface, ground or storm water may be polluted as a result of activities on the site. In the event that pollution does occur, this Department must be informed immediately.				Thank you for your comment, it is noted. This has been included in the mitigation tables, of both the BAR and EMPr.
4.	4.The person who owns, controls, occupies, or uses the land in question is responsible for taking measures to prevent any occurrence of pollution to water resources.				Thank you for your comment, it is noted. The EMPr clearly defines the responsibilities of the various personnel, particularly the proponent and their appointed contractor and engineer, this can be noted in Sections (10 – 12 and Section 15).
5.	5.The comments issued shall not be construed as exempting the applicant from compliance with the provisions of any other applicable Act, Ordinance, Regulation or By-law.				Thank you for your comment, it is noted.
6.	6.All the requirements of the National Water Act, 1998 (Act 36 of 1998) regarding water use and pollution prevention must be adhered to at all times.				Thank you for your comment, it is noted.

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**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

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					The National Water Act, 1998 (Act 36 of 1998), is one of many legislative compliance requirements listed in the BAR and EMPr (Section 6).
7.	<p>7.Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received.</p> <p>Please do not hesitate to contact the above office should there be any queries.</p>				Thank you for your comment, it is noted.
8.	<p>1.Your 24/CT/APPE20/07/22 of 11 July 2022 and accompanying docs.</p> <p>2.I note that this application ito the NEMA requires no input from this Branch, as it will no traffic impact on the Proclaimed Road System.</p>	10 August 2022	Mr. A. Cope	Department: Transport & Public Works Western Cape Government	Thank you for your comment, it is noted. It is noted that the Department of Transport and Public Works has confirmed that the development will have no traffic impacts the Proclaimed Road System and has no objection to this proposed

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<b>NO.</b>	<b>COMMENT RECEIVED</b>	<b>DATE RECEIVED</b>	<b>I&amp;AP</b>	<b>COMPANY/ ORGANISATION</b>	<b>RESPONSE</b>
	3. Notwithstanding, this Branch offers no objection to this proposed crematorium on the above erf, on condition that all the affected Directorates of the City of Cape Town approve of this development.				development, on condition that all the affected Directorates of the City of Cape Town approve of this development.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
9.	<p><b>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM AND ASSOCIATED INFRASTRUCTURE ON ERF NO. 2433, MONTAGUE GARDENS.</b></p> <p>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.</p>	11 <sup>th</sup> August 2022	Ms T Dreyer	<p>Department of Environmental Affairs and Development Planning</p> <p>Directorate: Development Management, Region 1 Western Cape Government</p>	Thank you for your comment, it is noted.
10.	2. This Department has considered the draft BAR and has the following comments:				Thank you for your comments, they have been noted.



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
11.	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.				This has been amended.  This has been amended.
12.	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.				Thank you for your comment, it has been noted.
13.	2.3 Specialist Assessments:				The Health Specialist has confirmed that the curriculum vitae has been included as an addendum to the Specialist Report, as per the requirements
14.	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.				

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	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).				of Appendix 6 of the EIA Regulations, 2014 (as amended).
15.	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.				The Specialists Curriculum vitae was included in the report. However, this will be updated to include the reference to previous Air Quality Impact Assessments conducted by the specialist, in the Final BAR.
16.	2.4 Surrounding Environment and Air Quality impacts:				Thank you for your comment, it has been noted by the EAP and all specialists. The specialist will correct the information and provide further clarity.
17.	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.				
18.	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				Thank you for your comment, it has been noted.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>requirements in respect of any proposed cremation facility must be noted and adhered to:</p> <ul style="list-style-type: none"> <li>• The facility must be located at least 500 meters away from any habitual dwelling;</li> <li>• The chimney must have a height of not less than 3 meters above the apex of the roof;</li> <li>• The premises shall be kept in a clean, sanitary and in good repair;</li> <li>• The facility shall be adequately ventilated and illuminated;</li> <li>• The facility shall be operated and managed in such a manner as to prevent the dispersion of ash into the atmosphere; and</li> <li>• 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).</li> </ul> <p>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.</p>				<p>This is noted. Please refer to Section 2.3.3.3 of the Comments and Responses Report.</p> <p>This is noted. Please refer to Section 2.3.3.4 of the Comments and Responses Report.</p>

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19.	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.				Please refer to Section 2.3.3.4 of the Comments and Responses Report.
20.	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.				Please refer to the response in Section 2.3.5.1. of the Comments and Responses Report. Comments from City of Cape Town can be found in Appendix E15.
21.	2.5 Confirmation of availability of services:				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	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.				Please refer to section 2.3.3.5 of the Comments and Responses Report.
	<p>2.6 Public Participation Process:</p> <p>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):</p> <ul style="list-style-type: none"> <li>• Proof that a copy of the draft BAR was placed at the Milnerton Public Library;</li> <li>• Proof that the draft BAR was made available to registered interested and affected parties ("I&amp;APs");</li> <li>• All comments received from I&amp;APs;</li> <li>• A Comments and Responses Report, indicating all the comments received from I&amp;APs on the draft BAR and the responses thereto; and</li> <li>• A complete list of registered I&amp;APs.</li> </ul>				The Proof of Public Participation has been summarized and included in Appendix C of the Comments and Responses Report and Appendix F of the BAR. All copies of original comments received will only be issued in the Final BAR



APPENDIX D: COMMENTS AND RESPONSE TABLE

COMMENTS AND RESPONSES REPORT

POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.

COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
22.	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.				The Declarations will be included in the Final BAR.
23.	3. All comments <b>must be adequately addressed</b> 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.				An additional 30-day public participation will be undertaken, with the revised DBAR.
24.	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>i.e.</i> , 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>i.e.</i> , 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a				The Department was notified of this via email, on the 5 <sup>th</sup> of September 2022, DEA&DP admin, had provided confirmation of receipt.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.				
25.	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.				The client has been advised accordingly.
26.	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				The aforementioned reference will be used in all future communication.
27.	D: PCM REFERENCE NUMBER: 19/3/2/4/A8/84/PMIM028/22 ENQUIRIES: Gunther Frantz	11 <sup>th</sup> August 2022	Ms A McClelland	Department of	

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>DATE: 11 August 2022</p> <p>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CAPE TOWN</p> <p>The Directorate: Pollution and Chemicals Management (D: PCM) acknowledges receipt of the Draft Basic Assessment Report (DBAR) on 11 July 2022. Please find comment from the D: PCM as follows:</p>			Environmental Affairs and Development Planning	Thank you for your comment, it is noted.
28.	1. The location of the Liquified Petroleum Gas (LPG) storage tanks must be clearly indicated on the site layout plan of the proposed facility.			Directorate: Pollution and Chemicals Management	This has been included as a recommended condition of the EA in the BAR and has been included in the EMPr.
29.	2. The potential safety impact and risk factors have been identified and assessed (page 130 of the DBAR) with basic mitigation measures provided. Given the site is located within a built-up industrial area and LPG is explosive and extremely flammable, it is recommended that a screening risk assessment be undertaken to establish if the facility will constitute a Major Hazard Installation or if additional site-specific mitigation				This has been included as a recommended condition of the EA in the BAR and has been included in the EMPr.. In order to

**APPENDIX D: COMMENTS AND RESPONSE TABLE****COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	measures are required, for example, a blast wall between the LPG installation and perimeter or closest building, specific location of the LPG tanks on site where they pose the least risk, etc.				inform the final designs and layouts.
30.	3. The LPG storage tanks should have adequate security fencing around it to prevent unauthorized access to the tanks and the storage tanks must be clearly marked with the Hazchem placards, as listed in South African Bureau of Standards (SABS) 0232.				This will be included in the mitigation tables of the BAR and Draft EMPr.
31.	4. As stated on page 131, the appropriate signage on the LPG storage area must be in place. The proper safety signage must be erected on the security fence to alert individuals of the potential danger and these signs must comply with the SABS 1186: Part 1.				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
32.	Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided. The Department reserves the right to revise or withdraw comments or request further information based on any information received.				Thank you for your comment, it is noted.



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
<b>ORGANS OF STATE</b>					
33.	Environmental Health Department comments in accordance to regulation relating to the management of human remains 363, section 18 are as follows:  18 (1) A cremation facility must comply to the following-	11 August 2022	P. Mposula	City of Cape Town: Environmental Health	Thank you for your comment, it is noted
34.	(a) the site must be located at least 500m from any habitable dwelling;				Thank you for your comment, it is noted. Please refer to section 2.3.3.3 of the Comments and Responses Report.
35.	(b) the chimney must have a height of not less than 3 meters above the roof;				
36.	(c) no cremation shall take place until the minimum combustion temperatures of the urn has been reached;				
37.	(d) the premises shall be kept in a clean, sanitary and in good repair;				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
38.	(e) the facility shall be adequately ventilated and illuminated;				
39.	(f) the facility shall be operated and managed in such a manner as to prevent the dispersion of ash into the atmosphere; and.				
40.	(g) emissions levels shall conform to the ambient air quality or emission standards as determined in terms of the National Environmental Management : Air Quality Act 39 of 2004.				
41.	Our Ref: SSD14/2/6/1/4/N_Erf 2433_montague gardens_crematorium	11 <sup>th</sup> August 2022	Mr I Adams	CapeNature - Landscape West Conservation Operations	Thank you for your comment, it is noted.
42.	1. It is understood based on the DBAR that the site is completely transformed and no longer supports any indigenous vegetation. Furthermore, the site is surrounded urban development. The site is also unselected as per the BioNET with no wetlands mapped on site. The site is however adjacent to a watercourse, and thus an aquatic compliance statement was provided. The compliance statement indicated that the				All recommended mitigation measures as per the Aquatic Compliance Statement have been integrated into Section H of

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	watercourse was in a degraded state and proposes controls and mitigations to ensure that the watercourse is not further degraded by the proposed development.				the BAR and Sections 10 and 11 of the Draft EMPr.
43.	2. The aquatic compliance statement is supported and all mitigation measures should be implemented. From a biodiversity perspective the development is low impact.				
44.	CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.				Thank you for your comment, it is noted.
45.	<p>ERF 2433, No 55 STELLA ROAD, MONTAGUE GARDENS: PROPOSED ESTABLISHMENT OF A CREMATORIUM – DRAFT BASIC ASSESSMENT REPORT AND AEL (DEA&amp;DP REFERENCE: 16/3/3/1/A1/20/3027/22)</p> <p>The draft Basic Assessment Report (DBAR), submitted under your cover letter, dated 11 July 2022, pertaining to the abovementioned project, refers.</p> <p>The following comment is provided from the relevant City of Cape Town Departments based on the</p>	11 <sup>th</sup> August 2022	Mr M Theron : Spatial Planning and Environment Directorate - Environmental Management	City Of Cape Town:	Thank you for your comment, it is noted.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	information provided in the Draft BAR:		nt Department		
46.	1. Spatial Planning and Environment Directorate: District Planning and Mechanisms Branch				
47.	1.1 The District Planning and Mechanisms Branch indicated that the location of preferred Alternative 1 appears appropriate from a spatial planning perspective. Erf 2433, Montague Gardens is located within an established industrial area. Erf 2433 is located near a Risk zoned tank farm to the north of the site, which already has exclusion zones/buffers around it. In addition, there are numerous other Major hazardous installations in Montague Gardens. This aforementioned position is however held on condition that the proposed location is also compliant to other applicable regulations/legislation, notably the Management of Human Remains R363 of 2013, promulgated in terms of the National Health Act 61 of 2003 (refer to point 4.4 below).		Spatial Planning and Environment Directorate: District Planning and Mechanisms Branch		Thank you for your comment, it is noted.  Please note the response as per section 2.3.3.6.
48.	1.2 The preferred Alternative 2 site is not appropriate from a land use compatibility perspective. Should the applicant want guidance on alternative sites, as requested by the Air Quality Management (refer to points 3.7				Thank you for your comment, it is noted.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	and 4.3.2 below), they can liaise with the acting Manager: Metropolitan Spatial Planning Branch Annelise.debruin@capetown.gov.za for assistance.				Please note response as per the Comments and Responses Report Section 2.3.3.4.
49.	1.3 The overall principle of an additional crematorium within the City of Cape Town's jurisdiction encouraged in terms of supporting a compact and efficient urban form.				Thank you for your comment, it is noted that the principle of an additional crematorium within the City of Cape Town's jurisdiction is encouraged.
50.	2. Spatial Planning and Environment Directorate: Development Management Branch				
51.	2.1 The Development Management Branch indicated that Erf 2433, Montague Gardens is zoned for General Industrial 1 (GI1) use. In terms of the City of Cape Town Development Management Scheme (DMS) a crematorium facility is permitted as a primary right in terms of the General Industrial 1 (GI1) zoning. The aforementioned is sufficiently reflected under the General Project Description section (page 4 of 169) of the DBAR.		Spatial Planning and Environment Directorate: Development Management Branch		Thank you for your comment, it is noted.  Thank you for confirming that the zoning is correct, and the intended land use is permitted.
52.	3. Spatial Planning and Environment Directorate: Environmental Management Department - Environmental and Heritage Management Branch				Thank you for your comments, it is noted.



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
53.	DBAR				
54.	3.1 Section A: Administrative Details (Pages 18 and 19 of 169): Please replace Mr L Mbandazayo's name as the City of Cape Town contact person with Ms S. Warnich-Stemmet, Tel: 021 440 0598, E-mail: Sonja.Warnichstemmet@capetown.gov.za)				This has been updated in the BAR.
55.	3.2 Section C: Legislation/Policies, sub-section 3: Other legislation - National Health Act (page 25 of 169): The statement is made that the term "habitable dwellings" is not defined in the National Health Act, therefore other forms of acceptable legislation such as the Rental Housing Act, 2014 "habitable" definition was considered. As this facility is being proposed within the jurisdiction of the City of Cape Town, it is worthy to note that the City of Cape Town Development Management Scheme defines "dwelling house", "dwelling unit" and "habitable space" respectively as follow: <ul style="list-style-type: none"> <li>'dwelling house' means a building containing only one dwelling unit, together with such outbuildings as are</li> </ul>				<p>Thank you for your comment, it is noted.</p> <p>The definitions as per the City of Cape Town Development</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**


NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>ordinarily used with a dwelling house, including domestic staff quarters.</p> <ul style="list-style-type: none"> <li>• 'dwelling unit' means a self-contained, interleading group of rooms, with not more than one kitchen, used for the living accommodation and housing of one family, together with such outbuildings as are ordinarily used therewith, but does not include domestic staff quarters, or tourist accommodation or accommodation used as part of a hotel.</li> <li>• 'habitable space' means space used, designed, adapted or intended to be used by persons for sleeping in, living in, preparation or consumption of food or drink, transaction of business, rendering of services, manufacturing, processing or sale of goods, performance of work, gathering together of persons or for recreational purposes.</li> </ul>				Management Scheme, is noted. Kindly see response as per Section 2.3.3.3. of the Comments and Responses Report.
56.	3.3 Section C: Legislation/Policies, sub-section 3: Other legislation – NEM: AQA (page 30 of 169): Table 5 lists a comprehensive list of schools located in relation to Erf 2433. However, the new secondary school built in 2016, situated on Erf 37360, cnr				Thank you for your comment, this has been updated.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

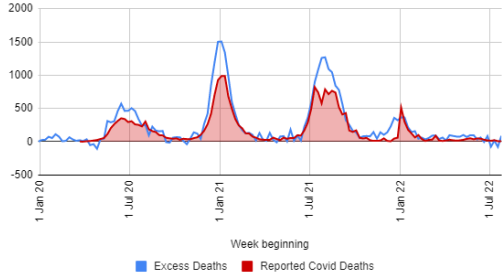
NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>Omuramba Road and Freedom Way, Marconi Beam does not appear to be on the list. Refer to Figure 1 below for convenience.</p>  <p>FIGURE 1: New secondary school located on Erf 37360, Marconi Beam (being 2,6km south of Erf 2433, Montague Gardens)</p>				
57.	3.4 Section E: <i>Planning Context and Need and Desirability</i> , Sub-section 4.3 <i>The spatial</i>				Thank you for your comment it is noted. As confirmed by the Parks and Recreations branch of CoCT, there is a need for such a

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>development Plan of the local municipality (page 50 of 169): The unprecedented increase in the death rate as a result of the Covid pandemic is undeniable during the period March 2020 to January 2022. However, according to the latest SA Medical Research Council and the Johns Hopkins University CSSE data the Western Cape<sup>1</sup> and South African<sup>2</sup> death rate attributed to Covid cases has decreased significantly over the past six (6) months (Refer to the graph below).</p> <p>WC (Natural) Excess Deaths and Reported Covid-19 Deaths</p>  <p>Therefore, it is cautioned to kindly avoid referencing sensationalistic media articles, as cited on pages 83 to 84 of the DBAR. It is advised to reference accredited medical sources if the argument is made that an additional crematorium facility is required due to Covid-19.</p>				<p>facility in the City of Cape Town, given the grave shortage.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
58.	<p>3.5 Section F: Public Participation, sub-section 3 (page 67 to 69): The names of City of Cape Town officials listed under the Organs of State table is incorrect. A number of the officials that are listed do not deal with applications in the Blaauwberg area, Northern Region of the City. Be advised that the Environmental Management Department (EMD) is the official entry- and exit point for EIA comment in terms of the City of Cape Town's Systems of Delegation. As such you do not need to circulate your DBAR to random internal city departments. EMD will assess the DBAR and circulate the report internally in order to ensure that the relevant departments receive the report. Thereafter you will be provided with one singular co-ordinated City comment. As such, please remove the lists of ad hoc city official names and only retain the following:</p> <ul style="list-style-type: none"> <li>• Ms S. Warnich-Stemmet, Tel: 021 440 0598, E-mail: Sonja.Warnichstemmet@capetown.gov.za)</li> </ul> <p>In light of the simultaneous Air Emission Licence (AEL) application being circulated the following City of Cape Town: Air Quality Management officials' names must also be listed:</p>				<p>Thank you for your comment, it is noted. The I&amp;AP Register has been updated accordingly.</p>



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<ul style="list-style-type: none"> <li>Air Quality Officer - Ian Gildenhuys, <a href="mailto:Ian.Gildenhuys@capetown.co.za">Ian.Gildenhuys@capetown.co.za</a>,</li> <li>Regional Air Quality Practitioner – Wendy Kloppers, <a href="mailto:wendy.kloppers@capetown.co.za">wendy.kloppers@capetown.co.za</a></li> <li>Senior Air Quality Practitioner - Gerswain Manuel, <a href="mailto:Gerswain.manuel@capetown.gov.za">Gerswain.manuel@capetown.gov.za</a></li> </ul> <p>This should also be reflected in the FBAR.</p>				
59.	3.6 Section F: Public Participation, sub-section 3 (page 67 to 69): Be advised that Erf 2433 falls with an area where Eskom is the Supply Authority and not the City of Cape Town. As such ensure that comment is obtained from Eskom with regards to services infrastructure availability.				Thank you for your comment, it is noted. Eskom has provided clarity as per Appendix E16 of the BAR and has confirmed that no further information is required of them.
60.	3.7 Section H: Alternatives, Methodology and Assessment of Alternatives: Table 8: Comparative site alternatives (pages 92 to 94): The fact that the land owner of Alternative 2 (Erf 358, Blackheath Industria) does not agree to the use of a crematorium on his property renders this alternative null-and-void. This means this DBAR effective has zero site location alternatives. The lack of alternative site location selections is				Thank you for your comment, it is noted. Kindly refer to response provided in Section 2.3.3.4. of the Comments and Responses Table.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**


NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	questioned as it renders the NEMA requirement to assess viable site alternatives pointless? The opinion is held that the proponent and/or EAP should include pragmatic site location alternatives that are actually available for consideration.				
61.	3.8 The utilization of LPG gas as preferred fuel source is considered to be the most appropriate.				Thank you for your comment, it is noted.
62.	3.9 On page 105 there appears to be typing errors "From a socio-economic perspective, crematoriums are better suited than a [crematorium] cemetery, as they are ...". Please correct this statement.				Thank you for your comment, it is noted, and the correction has been made.
63.	3.10 Potential impact: Social Impact - Visual (pages 121 to 123): Erf 2433 is currently devoid of any landscaping both on-site and along the Stella Road reserve abutting the property as is evident from Figure 2 below. In addition to the proposed visual mitigation measures already listed in the DBAR it is suggested that landscaping be implemented in order to improve the Stella Road interface. The position of the existing municipal services (i.e. water, sewer and/or stormwater) does not impede the possibility to introduce some trees and shrubs in the onsite parking area and the Stella Road reserve abutting the property. Therefore, the				<p>Thank you for your comment, it is noted. Please refer to Section 2.3.2. of the Comments and Responses Report.</p> <p>The BAR and EMPr will be updated to reflect this, as per Section H and Section 11 respectively.</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**


NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>submission of a Landscape Plan to the City of Cape Town: Head: Environmental &amp; Heritage Management must be included as a mitigation measure under this section, as well as in the draft EMPr.</p> 				

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	 <p>FIGURE 2: Erf 2433, MGI: Aerial view and Plan viewer [with Water (blue), Sewer (red) and Stormwater (green) services location in relation to the erf boundaries]</p>				
64.	Draft EMPr (SES Ref: CT24/EMPR/07/22), dated July 2022				Thank you for your comment, it is noted. The EMPr will be updated accordingly, however this
65.	3.11 Section 4.2: Technology (page 6): It is stated that the Johnson Thermal Engineering (JTE) BA2 cremators has a proven				

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	track record. List a few locations in South Africa where the JTE BA2 cremators have successfully been installed (e.g. Lenasia and Tshwane)).				information was provided as a part of Appendix L of the DBAR.
66.	3.12 Section 17.2.2: <i>ECO Inspections – Witten Records</i> (page 78): Copies of the monthly ECO reports must also be provided to the City of Cape Town: Head: Environmental & Heritage Management.				Thank you for your comment, it is noted. This will be integrated into the recommendations for EA conditions in the BAR.
67.	4. City Health: Specialised Environmental Health Services: Air Quality Management Branch				
68.	The following concerns and from an Air Quality Management perspective must be addressed:  4.1 Based on the information provided, it is evident that the proposed activities trigger a listed activity Category 8: Thermal Treatment of General and Hazardous Waste, Sub-category 8.2 Crematoria and Veterinary Waste Incineration in terms of the National Environmental Management: Air Quality Act 39(NEM: AQA), Listing Notice No. 893, dated 22 November 2013. In this regard the applicant must demonstrate that the proposed		City Health: Specialised Environmental Health Services: Air Quality Management Branch		Thank you for your comments, it is noted.  Kindly see Section 2.3.3.1. of the Comments and Responses Report.



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATI ON	RESPONSE																																													
	<div>equipment can achieve compliance to the New Plant Standards below:</div> <table><tr><td colspan="2">Description:</td><td colspan="2">Cremation of human remains, companion animals (pets) and the incineration of veterinary waste</td></tr><tr><td colspan="2">Application:</td><td colspan="2">All installations</td></tr><tr><td colspan="2">Substance or mixture of substances</td><td rowspan="2">Plant status</td><td rowspan="2">mg/Nm³ under normal conditions of 11% O₂ , 273 Kelvin and 101.3 kPa.</td></tr><tr><td>Common name</td><td>Chemical symbol</td></tr><tr><td>Particulate matter</td><td>N/A</td><td>New</td><td>40</td></tr><tr><td></td><td></td><td>Existing</td><td>250</td></tr><tr><td>Carbon monoxide</td><td>CO</td><td>New</td><td>75</td></tr><tr><td></td><td></td><td>Existing</td><td>150</td></tr><tr><td>Oxides of nitrogen</td><td>NO<sub>x</sub> expressed as NO<sub>2</sub></td><td>New</td><td>500</td></tr><tr><td></td><td></td><td>Existing</td><td>1000</td></tr><tr><td>Mercury (Applicable to human cremation only)</td><td>Hg</td><td>New</td><td>0.05</td></tr><tr><td></td><td></td><td>Existing</td><td>0.05</td></tr></table>	Description:		Cremation of human remains, companion animals (pets) and the incineration of veterinary waste		Application:		All installations		Substance or mixture of substances		Plant status	mg/Nm³ under normal conditions of 11% O₂ , 273 Kelvin and 101.3 kPa.	Common name	Chemical symbol	Particulate matter	N/A	New	40			Existing	250	Carbon monoxide	CO	New	75			Existing	150	Oxides of nitrogen	NO <sub>x</sub> expressed as NO <sub>2</sub>	New	500			Existing	1000	Mercury (Applicable to human cremation only)	Hg	New	0.05			Existing	0.05			
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69.	4.2 The report indicates that the proposed facility will be located in a General Industrial 1 (General Industry Subzone GI1) zoned area in Montague Gardens, which houses other general industrial activities. However, it is noted that the closest residential habitable areas are Milnerton and Bothasig, respectively approximately 300m to				Thank you for your comment, it is noted.																																													

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	<p>the West and 1 km to the East of the proposed facility as well as the closest school, which is regarded as a sensitive receptor trigger which is +- 0.9 km West of the proposed activity. (As referred in to Table1, page 19 of Atmospheric Impact Report).</p> <p>4.2.1 With regard to the above, from an air quality management perspective, the close proximity to human habitation and sensitive receptors, is of concern, as the operation of the facility may have potential health risks and nuisances on the receiving environment if not managed in accordance with the required legislative context and provisions.</p>				<p>Please refer to section 2.3.3.3. of the Comments and Responses Report.</p> <p>Kindly refer to Section 2.3.1. of the Comments and Responses Report.</p>
70.	<p>4.3 With reference to Section H: Alternatives, Methodology and Assessment of Alternatives (page 90 of 169 of the DBAR) it is noted that the proposed Site Alternative 2 location is on Erf 358 Blackheath Industria, which according to the report is approximately 400m away from the Rustdal residential area. The location of the alternative site in relation to proximity to sensitive receptors raises similar concerns as noted in 4.2.1 above.</p>				<p>Thank you for your comment, it is noted.</p> <p>The vicinity to the residential area is noted.</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>4.3.1 In order for Site Alternative 2 to be satisfactory alternative site, the proponent will be required to undertake a full evaluation and review in order to establish whether it can be deemed as a satisfactory alternative.</p> <p>4.3.2 The City of Cape Town: Air Quality Management Branch recommends that the proponent engage the City's Spatial Development Department who are able to advise of other areas (alternative site/s) that are specifically zoned to accommodate the impact of industrial activities on the environment.</p>				<p>Kindly refer to the response as per Section 2.3.3.4. of the Comments and Responses Report.</p> <p>As confirmed by the City of Cape Spatial Planning and Environment Directorate: Development Management Branch, Erf 2433, Montague Gardens is zoned for General Industrial 1 (GI1) use. In terms of the City of Cape Town Development Management Scheme (DMS) a crematorium facility is permitted as a primary right in terms of the General Industrial 1 (GI1) zoning.</p>
71.	4.4 Further, please note that both the preferred and the alternative site may not comply with				Thank you for your comment, it is noted. Please refer to the

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	the Regulations related to the Management of Human Remains R363 of 2013, promulgated in terms of the National Health Act 61 of 2003, which requires a 500m separation distance from Crematoria to habitable dwellings. This being the case, an application for exemption, would need to be made to the Director General of the National Department of Health, who has the mandate to grant an exemption to this provision. City of Cape Town: Air Quality Branch recommends that this matter be investigated further and addressed in the final BAR (FBAR).				response as per Section 2.3.3.3. of the Comment and Responses Report.
72.	4.5 It was noted that the report refers to the City's Air Quality Management (AQM) Bylaw 7662 dated 2016 as amended. However, it is imperative that the operations must comply with all the applicable provisions therein.				Thank you for your comment, it is noted. Compliance with this By-Law will be integrated into the EMP and BAR.
73.	4.6 The DBAR indicates that the proposed cremators/furnaces to be utilized are BA2 Cremators and the supplier is Engineered Thermal Systems (Pty) Ltd. For the City of Cape Town: Air Quality Management Branch's understanding and decision making purposes:				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>4.6.1 Provide supporting documentation regarding the design and specifications of the cremator, burner, and associated stacks. It is noted that six stacks will be installed; the Air Quality Management Branch recommend that a higher common stack be considered, as this may reduce the cost pertaining to annual Minimum Emission Standards (MES) monitoring and reporting.</p> <p>4.6.2 Supply the process flow diagram, a detailed explanation on the unit processes and a site layout to indicate all point/area sources etc.</p> <p>4.6.3 In the event that a positive environmental authorisation decision is granted, the applicant will be required to ensure that the cremators are operated in a manner as specified by the manufacturer's instructions. The proponent is required to engage with City of Cape Town: Air Quality Management Branch supplier to provide written confirmation that the operation of the proposed incinerator and associated stacks will comply with the new plant MES.</p>				<p>Thank you for your comment, it is noted. The details on the furnaces were provided in Appendix L, along with a guarantee letter from the manufacturer.</p> <p>Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.3.1. of the Comment and Responses Report.</p> <p>Please refer to the response as per Section 2.3.3.1. of the Comment and Responses Report. Section H of the BAR and Section 11 of the EMP, include this as a mitigation measure.</p>



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	4.6.4 Please be advised that it is the responsibility of the holder of the authorisation to ensure that the operator/s is fully trained to operate all equipment.				This will be undertaken only if environmental authorization is granted. Section H of the BAR and Section 11 of the EMP, include this as a mitigation measure.
74.	4.7 The proposed recommendations as documented in Section I: Findings, Impact Management and Mitigation Measures (pages 148 of 155 of the DBAR) on and the EMP dated July 2022 must be adhered to at all times.				Thank you for your comment, it is noted.
75.	4.8 It was noted that the Draft Atmospheric Impact Report, No. YTC1547SES/02, dated 24 May 2022, was scrutinised and from an air quality management perspective, City of Cape Town: Air Quality Management Branch hereby wish to comment as follows:  4.8.1 "This report fulfils the requirements for both the Specialist Air Quality Impact Assessment and the AIR and has been conducted in accordance with the Regulations Prescribing the Format of the Atmospheric Impact Report (G.N.R. 747 of 2013), the Regulations Regarding Air Dispersion Modelling (G.N.R. 533				Thank you for your comment, it is noted.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	of 2014) and Appendix 6 of the EIA Regulations (G.N.R. 982 of 2014)".				
76.	4.8.2 With reference to Section 4.2, Process Description of the Report:  4.8.2.1 It was noted that the establishment of the proposed crematorium will be undertaken in two phases. Phase one, comprising of two cremators and Phase two comprising four cremators, which will operate for twenty-four (24) hours daily.				Thank you for your comment, it is noted.
77.	4.8.3 With reference to Table 5. Comparison between MES Emissions Rates and Emissions Factors Emissions Rates, it is noted that the emission factor emission rates are higher than the MES emission rates for CO, NOx and Hg, that was used in the model as specified in the code of practise.				Thank you for your comment, it is noted.
78.	4.8.4 With reference to Section 5.4. Appliances and Abatement Equipment Control Technology.  4.8.4.1 It is noted that the cremator/incinerator and stacks/s are not coupled to any abatement equipment to reduce emissions				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>and impact on the receiving environment. This is a concern, as many cremators in South Africa are not achieving compliance with the New Plant Minimum Emission Standards (MES), without abatement equipment being installed.</p> <p>Furthermore, the Health Screening Assessment recommends the installation of abatement equipment.</p> <p>4.8.4.1.1 Therefore, City of Cape Town: Air Quality Management Branch strongly recommends that the applicant investigates and consider suitable abatement equipment that is compatible with the cremators. Once concluded, City of Cape Town: Air Quality Management Branch further require that such information be provided in the final BAR.</p>				<p>Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.3.1. of the Comment and Responses Report. The Health Assessments abatement recommendations have been included in the BAR and EMP, should the need arise, however the manufacturer has proven technology compliance with the New Plant Minimum Emission Standards.</p>
79.	<p>4.8.5 With reference to Section 7.5. Modelling Procedure, it is noted that a Level 2 assessment was used based on Section 2.1.2 of the Code of Practice. The model was undertaken using the AERMOD View Version 10.2.1 interface and AERMET View Version 10.2.1 pre-processor.</p>				<p>Thank you for your comment it is noted.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
80.	4.8.6 City of Cape Town: Air Quality Management Branch note some inconsistencies in the Units of measure used in the various pollutants reported, where the Table shows the data in ppb, whilst the pollution isopleths use Micrograms/M3 e.g. Table 23 and Figures 32& 33 as well as Table 26 and Figures 34 and 35. This inconsistency should be rectified and a consistent unit of measure is to be used across the tables and the isopleth figures, in the final report, where possible.				Thank you for your comment it is noted.  The Air Quality Specialist confirmed that this is noted, and it will be rectified where possible in future versions of the AIR, should the project proceed.
81.	4.8.7 With reference to Section 7.6.4 - NO <sub>2</sub> , it is noted that the maximum predicted fence line concentration is 193 ppb which is higher than the hourly NAAQS standard for NO <sub>2</sub> , which is 106 ppb. However, the concentration rapidly decreases with distance from the site, and no NAAQS exceedances are predicted at any sensitive receptors. The ambient annual NO <sub>2</sub> concentration at the fence line is predicted to comply with the annual NAAQS for NO <sub>2</sub> .				Thank you for your comment it is noted.
82.	4.8.8 In order to address the predicted exceedances of the NO <sub>2</sub> hourly ambient air quality standard off-site, the Specialist must identify an alternative stricter NO <sub>2</sub> emission rate				Thank you for your comment it is noted. The Air Quality Specialist confirmed that this is noted and

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>that can be applied to the facility in the event that the Environmental Authorisation is granted and a further decision is made to issue the Atmospheric Emission Licence, by the AEL competent authority.</p> <p>4.8.8.1 City of Cape Town: Air Quality Management Branch is concerned that the cumulative impacts of the various listed and non-listed activities taking place in close proximity to the proposed Crematorium have not been adequately considered in the Atmospheric Impact Report e.g. the existing NEM:AQA listed activities (Astron Energy, Permoseal, BP, Engen, Cape Precious Metals are all in close proximity) and facilities operating coal-fired boilers such as Gayatri Paper and Novus Printing Works located in Montague Gardens. In this regard, the Air Quality Specialist is requested to review the report and provide further comment on the cumulative impact of these emission sources on the receiving environment.</p> <p>4.8.8.2 City of Cape Town: Air Quality Management Branch notes the ambient air quality data uncertainty and data gaps from the City's own ambient air quality monitoring network. As</p>				<p>will be included in future versions of the AIR, should the project proceed.</p> <p>The Air Quality Specialist confirmed that this is noted and will be included in future versions of the AIR, should the project proceed. The BAR and EMPr have been updated accordingly.</p> <p>The Air Quality Specialist confirmed that this is noted and</p>



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	such it is encouraged that the ambient monitoring data from ESKOM's Edgemead monitoring station (which has excellent data recovery rates), also be reviewed. Access to this data can be facilitated through ESKOM's Environmental Department.				will be included in future versions of the AIR, should the project proceed.
83.	<p>4.9 City of Cape Town: Air Quality Management Branch further acknowledges that this report forms part of the Public Participation Process (PPP) and is undertaken by Sharples Environmental Services as the independent Environmental Assessment Practitioner (EAP), as prescribed by Section 38 of NEM: AQA. Once the PPP has been concluded, a Public Participation Report must be compiled and submitted as supporting documentation with the Atmospheric Emission Licence (AEL) Application. Should objections be received, such objections must be adequately addressed by the EAP and reported to the Air Quality Officer. Should no objections be received a declaration must be signed, as proof thereof.</p> <p>4.9.1 The Atmospheric Emission Licence application must be made in terms of the 2017 National Framework for Air Quality Management in the Republic of South Africa, No.1144 of 26 October 2018, Section 5.6 you are</p>				<p>Thank you for your comment it is noted.</p> <p>The relevant information will be supplied to the Air Quality Specialist who is undertaking the AEL application, as per their request.</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE															
	compelled to apply via the System for National Atmospheric Emissions Licencing (SNAEL) Portal website www.saelip.environment.gov.za/SAELIP , to the City of Cape Town as the licencing authority.				Thank you for your comment it is noted.  The Air Quality Specialist confirmed that this is noted.															
84.	<p>4.9.2 An AEL processing fee will be levied as prescribed by the Regulations 250 of 11 March 2016, Annexure A (below). The fees must be paid prior to the processing of your AEL application. Upon application, an official invoice will be generated to facilitate payment processing. Proof of payment must be submitted in order for the AEL application to be processed. Below is the excerpt from the Regulation:</p> <table><tr><th colspan="4">ANNEXURE A</th></tr><tr><td colspan="4">The processing fees are as follows:</td></tr><tr><td>Application for new atmospheric emission licence</td><td>Application for atmospheric emission licence review</td><td>Application for atmospheric emission licence renewal</td><td>Application for atmospheric emission licence transfer</td></tr><tr><td>R10 000 per listed activity</td><td>R10 000 per listed activity under review</td><td>R5 000 per listed activity</td><td>R2 000</td></tr></table>	ANNEXURE A				The processing fees are as follows:				Application for new atmospheric emission licence	Application for atmospheric emission licence review	Application for atmospheric emission licence renewal	Application for atmospheric emission licence transfer	R10 000 per listed activity	R10 000 per listed activity under review	R5 000 per listed activity	R2 000			Thank you for your comment it is noted.  The Air Quality Specialist who will be undertaking this application, has been notified.
ANNEXURE A																				
The processing fees are as follows:																				
Application for new atmospheric emission licence	Application for atmospheric emission licence review	Application for atmospheric emission licence renewal	Application for atmospheric emission licence transfer																	
R10 000 per listed activity	R10 000 per listed activity under review	R5 000 per listed activity	R2 000																	

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
85.	4.9.3 Should the Department of Environmental Affairs and Development & Planning (DEADP) grant the authorisation, it must be uploaded as supporting documentation on SAAELIP.				Thank you for your comment it is noted.
86.	<p>4.10 Compliance with Section 35 of the NEM: AQA as amended -Part 6: Measures in respect or dust, noise and offensive odours.</p> <p>4.10.1 With reference to Section 12 Environmental Impact Management: Post Construction Phase &amp; Operational Phase of the EMPR.</p> <p>4.10.2 The fugitive emissions pertaining to the handling, storage and disposal of ash as a waste product must also be taken into consideration so that it does not cause any nuisances.</p> <p>4.10.3 A Fugitive Emissions Management Plan (FEMP) will be required to include the applicable method statements applicable to air pollution to include at least the following:</p> <p>4.10.3.1 Identify all possible sources of odour and dust within the affected area.</p> <p>4.10.3.2 Detail the best practical environmental measures to be undertaken to mitigate odour and dust emissions.</p>				<p>Thank you for your comment it is noted. Please refer to Section 2.3.1.3. The technology is designed to be smokeless and odourless.</p> <p>Ash will be removed using cleaning tools (designed for this purpose), and therefore, minimizing the potential for dispersion.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	4.10.3.3 Detail the implementation schedule. 4.10.3.4 Identify the line management responsible for the implementation. 4.10.3.5 Establish a register for recording all complaints received by the responsible person as well as the recording follow-up actions and responses regarding the complaints.				
87.	4.11 The holder of the Authorisation must ensure that all aspects detailed in the EMP must be sustainable and implemented during all phases of the project.				Thank you for your comment it is noted.
88.	4.12 Should it be necessary, the AQO reserves the right to call for compliance with the National Dust Control Regulations, R 827 of 2013 promulgated in terms of the National Environmental Management: Air Quality Act 39 of 2004 as amended.				Thank you for your comment it is noted.
89.	4.13 The Air Quality Management Unit reserves the right to call for further requirements in through the Atmospheric Emission Licensing application process, should it be deemed necessary.				Thank you for your comment it is noted.
90.	5. Safety and Security: Fire and Rescue Services  The Fire and Rescue Services indicated the following:		Safety and Security: Fire and Rescue Services		Thank you for your comment it is noted. This has been included as

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>5.1 A fire plan which complies with SANS 10400-T:2020 and the By-Law relating to Community Fire Safety of 2002 will have to be submitted prior to approval from Fire and Rescue Services.</p> <p>5.2 The applicant's is cautioned that in terms of the National Health Act, 2003 Regulations relating to the management of human remains, a crematorium may not be built within 500 metres of a habitable building.</p>				<p>a condition of environmental authorization.</p> <p>Kindly refer to the response provided in Section 2.3.3.3. of the Comments and Responses Report.</p>
91.	<p>6. Water &amp; Sanitation Department: Water Demand Management Branch</p> <p>The Water Demand Management Branch indicated that Erf 2433, Montague Gardens is served by good water and sanitation infrastructure with substantial capacity. The DBAR however did not specify the amount of potable water that will be utilized by the crematorium and/or for what activities the water will be used? The anticipated average annual daily demand (AADD) of water must therefore be specified in the final BAR.</p>		Water & Sanitation Department : Water Demand Management Branch		<p>Thank you for your comment it is noted. Please refer to the response as per Section 2.3.3.5. of the Comment and Responses Report.</p> <p>Please refer to the response as per Section 2.3.3.5. of the</p>



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**


NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>□ It is anticipated that dust will be generated, whilst the cleaning of equipment will also take place (possibly by means of chemicals usage).</p> <p>□ The domestic use by people working at the crematorium is anticipated to be minimal.</p> <p>□ Interim feedback from the Water &amp; Sanitation: Water pollution control unit cautioned that any wet-waste regarded will be considered to be industrial waste. The disposal of industrial waste will have to comply with pollution control bylaws. Depending on the type of activities the water will be used for, and the pollutants in the runoff, pre-treatment may be required before the runoff are disposed into the sewer network.</p>				<p>Comment and Responses Report.</p> <p>This is anticipated by the EAP as well.</p> <p>Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.3.5. of the Comment and Responses Report.</p>
92.	<p>6.1 Water Reticulation:</p> <p>The site is served by a 200mm water supply at a peak pressure of 59m. The current water consumption of the property to be</p>				<p>Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.3.5.</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>redeveloped is 2.88kl/day as reflected in the Figure 3 data below.</p>  <p>FIGURE 3: Current water consumption of Erf 2433, Montague Garden being 2.88kl/day</p>				of the Comment and Responses Report.
93.	6.2 Bulk Water: There is likely sufficient bulk water capacity.				Thank you for your comment it is noted.
94.	6.3 Sewer Reticulation: The site is served by a 150mm sewer in Stella Street and a 225 mm sewer at the north Side of the site. Sewer flows to Koeberg Road Pump Station which has been identified for an upgrade over the next few years.				Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.3.5. of the Comment and Responses Report.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
95.	<p>6.4 Water Pollution Control:</p> <p>It is reiterated that in the event of the proposed development discharging any industrial type effluent into the municipal sewers, an application to discharge industrial effluent into municipal sewer system will be required.</p> <p>The business owner essentially need to apply to Shahied Solomon (Shahied.Solomon@capetown.gov.za) or Molepana Ramonyai (Molepana.Ramonyai@capetown.gov.za ) for permission to discharge. These City Officials will be able to guide the developer/owner with regards to the process.</p>				Thank you for your comment it is noted. This will be included under in the EMPr.
96.	<p>6.5 Wastewater Treatment Works:</p> <p>The proposed development drains to the Potsdam Wastewater Treatment Plant (WWTW).</p> <p>The Potsdam WWTW is currently at capacity and is being upgraded. Completion date for the upgrade is expected to be the 4th quarter of 2027.</p>				Thank you for your comment it is noted. The consumption of the proposed development is far lower than that of the current manufacturer, therefore, the contribution to waste water will be as well.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
97.	6.6 Water Demand Management Branch's Conclusion:  6.6.1 Provided the water consumption is below the 2.88kl/day for the proposed redevelopment water and sewer capacity could be accommodated.  6.6.2 Once the actual estimated water consumption and the activities for water usage is provided in the Final BAR the city will be able to confirm final water and sanitation infrastructure capacity.				Thank you for your comment it is noted. Please refer to the response as per Section 2.3.3.5. of the Comment and Responses Report.  The aforementioned will be included in the BAR, which will be circulated to the public.
98.	7. Recreations and Parks Department: Cemetery Management Branch The Branch indicated the following:				
99.	7.1 The City of Cape Town is facing critical grave shortages in local municipal Cemeteries. This will result in families having to travel a lot further (40Km+) in future to find burial space. The creation of additional crematorium facilities is therefore encouraged, as cremated remains may be added to full family graves, thereby reusing existing graves locally.			Recreations and Parks Department : Cemetery Management Branch	Thank you for your comment, it is noted that there is a critical shortage of graves within the local municipality, resulting in excessive travel for customers. It is noted that cremations are encouraged by this branch of CoCT.
100.	7.2 The current limited number of crematoria in the Western Cape proved to struggle during the past Covid 19 Pandemic,				Thank you for your comment, it is noted that during the COVID19

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	therefore additional crematoria facilities will be beneficial to the greater Western Cape Province. There is currently no crematorium in West Coast District as the crematorium Malmesbury closed down. This results in residents in the West Coast being discouraged to cremate from this region, having to pay extra for transporting deceased to Maitland or Durbanville for Cremation.				pandemic the existing crematoria did struggle. It is further noted that the additional crematoria would be beneficial, particularly for the residents in the West Coast.
101.	7.3 The cost of establishing crematoria is significantly due to a lack of supply and demand disparity. As such the creation of additional crematoria could contribute to keep costs more competitive.				Thank you for your comment, it is noted that the additional crematoria would be beneficial, and can play a role making costs more competitive, making this option of disposal more feasible for people.
102.	CONCLUSION The above-mentioned City of Cape Town comment must be addressed and included in the Final Basic Assessment Report (FBAR). A copy of the FBAR and final decision, issued by the Competent Authority, must kindly be submitted to the City of Cape Town for record purposes. Yours sincerely		Spatial Planning and Environment Directorate Enviro. Manageme		Thank you for your comment, it is noted. This will be submitted, however, private information in line with POPI, 2013, can only be shared with the Competent Authority.



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
			nt Department		
<b>OTHER ORGANIZATIONS</b>					
103.	<p>Hiermee motiveer en ondersteun ek 'n addisionele krematorium in die weskaap as gevolg van die feit dat Covid 19 wat die wereld in 2020 getref het hele tendens kom verander het. Die huidige krematoriums is nie genoegsaam om die druk van 'n pandemie te verwerk nie.</p> <p>Die bestaande krematoriums tans in die weskaap is Maitland Krematorium, Durbanville Krematorium, Drakenstein en Worcester Krematoriums met die onlangse tweede en derde vlaag van Covid 19 is dit duidelik uitgewys dat ons huidige krematoriums nie die mas kan opkom nie. In die verlede se normale tye het jy asse van 'n oorledene so tuseen 3 tot 4 dae ontvang. Tydens die tweede en derde vlaag het ons tussen 21 tot 30 dae gewag vir asse, ons het persoonlik 'n paar sulke gevalle gehad en dit is vir die afgestorwene se families onaanvaarbaar gewees en baie trauma veroorsaak. Dan as gevolg van die ophoping van verassings kom daar ook hoë gesondheids risiko's ons het dit persoonlik ondervind met die</p>	03 August 2022	Mr. P.J. Mostert	Mossie Begrafnisdienste – Funeral Services	Thank you for your comment, your support is noted.

**APPENDIX D: COMMENTS AND RESPONSE TABLE****COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

<b>NO.</b>	<b>COMMENT RECEIVED</b>	<b>DATE RECEIVED</b>	<b>I&amp;AP</b>	<b>COMPANY/ ORGANISATION</b>	<b>RESPONSE</b>
	<p>manier hoe daar by Drakenstein Krematorium gewerk is met die oorledenes asook die manier hoe die ophoping van liggame hanteer is laat veel te wense oor, Dit is hoekom ek in Junie 2021 my verrassings geskuif het van Drakenstein krematorium na Durbanville toe.</p> <p>Daarom met als in ag geneem sal ek definitief 'n adisionele krematorium in die weskaap ondersteun</p>				

APPENDIX D: COMMENTS AND RESPONSE TABLE

COMMENTS AND RESPONSES REPORT

POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.

COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
ADJACENT I&AP'S					
104.	Please register 'Mr. S. Godwin' from Godwin Auto Electrical - Unit 2, 40 Stella Road to apply to be registered as Interested and Affected Parties as the small business oppose to the structural building of a crematorium right in the middle of an industrial area that will have a massive impact on our business being Auto Electrical.	15 July 2022	Mr. S. Godwin	Godwin Auto Electrical	Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.2. of the Comment and Responses Report.
105.	Not only is it a huge risk of smell and air pollution, but it contributes to the environmental effects including <b>the emission of millions of tons of carbon dioxide pollution into the air.</b>				Thank you for your comment, it is noted. Please refer to Section 2.3.1.1. of the Comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
106.	The City of Cape Town must not harm small businesses through the risk of health and safety issues and should consider the Green Policy keeping the environment in mind and to prioritise this as such.				Thank you for your comment, it is noted. City of Cape Town is not the applicant.
107.	<p>As the owners of ERF2434 Montague Gardens we wish to register our strong objection to the establishment of a crematorium on ERF2433 Montague Gardens.</p> <p>Our Property is located directly across Stella Road from ERF 2433 and would be directly impacted . Whilst we appreciate the need for these facilities , we believe they should be located in a heavy or noxious industrial area where smoke stacks and noxious activities are acceptable and away from the general public. ERF2433 is located in the middle of a light industrial /commercial area which is heavily occupied by many small businesses.</p> <p>The mere idea of having dead bodies ferried daily into a neighbouring building and being incinerated is abhorrent to most people who would then shun the area, to the detriment of</p>	19 July 2022	Mr. C. Murray	Colmatt Investments (Pty) Ltd	<p>Thank you for your comments, it is noted.</p> <p>Please refer to Section 2.3.1 and 2.3.2 of the Comments and Responses Report.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>all businesses and property owners. Even if air quality from the smoke stacks has been taken into account it would not allay the perception that there is contaminated air swirling in the area.</p> <p>Our property comprises four lettable units, all facing the proposed development. All tenants have expressed their concern as to how a crematorium would detrimentally affect their business and have all indicated that they would relocate should this project go ahead.</p> <p>Our property (ERF2434) was purchased as part of a retirement planning exercise by the shareholders. If tenants and prospective tenants decided to shun the area it would directly affect our rental income and property values in general.</p> <p>In the circumstances, as mentioned above we strongly object to the proposed crematorium.</p>				
108.	<p><b>Comment received through Yellow Tree:</b></p> <p>I have just received a phone call from "Mr. C. Cartmell" who works for Multiquip located at 40 Stella Road Montague Gardens. Please could you add him as an I&amp;AP and note his</p>	27 July 2022	Mr. C. Cartmell	Multiquip	Thank you for your comments, it is noted.



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	objection to the proposed crematorium. The objection is based on the proximity of the proposed crematorium to other businesses and his belief that the proposed location is inappropriate for a crematorium.				Please refer to Section 2.3.2 and 2.3.3.4. of the Comments and Responses Report.
109.	<p>I had a quick read through of the downloaded Draft Basic Assessment Report, much of which was extremely technical and not comprehensible for the average person, but my feelings about this proposed crematorium didn't change from prior to this new information being made available to me. Whilst I understand the need and demand for another crematorium, I do not believe that they should ever be located in a built-up area, whether residential, retail or industrial. There are plenty of ERFs not too far from this proposed site that would not impact on people (predominantly from an emissions perspective) anywhere near as much as this proposed site.</p> <p>We are located just behind Takealot, so we are almost a "stone's throw" away from the above ERF, and fundamentally I would not want (under any circumstances) to have the possibility of</p>	01 August 2022	Mr. J. Crookshank	UK Emporium (Cape Town)	<p>Thank you for your comment, it is noted. Please note the discussions as per section 2.3.3.4. of the Comments and Responses Report.</p> <p>Thank you for your comment, it is noted. Please note the discussions as per section 2.3.1.</p>

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	breathing in the smoke from the burning of human remains. This is simply a right that I believe I have, and not wholly based on any religious beliefs that I, my staff or any persons in the general location of this ERF may have. When the south-easter blows, which it does for many weeks of the year, this “smoke” would most definitely blow across our premises, and I believe that this is purely an unethical practice from my perspective.				and and 2.3.2. of the Comments and Responses Report.
110.	<p><b>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR AN ATMOSPHERIC EMISSION LICENCE FOR THE PROPOSED CREMATORIUM AT ERF 2433, MONTAGUE GARDENS</b></p> <p>1. We act for the Montague Park Owners Association, who own and manage Montague Park, situated adjacent to the proposed Crematorium, on the opposite side of the Tanzanite Street. The Park is a mixed retail, business and industrial park, which holds an environmental authorisation for the development of the business park, issued in 2008. As holders of the environmental authorisation, the Owners Association is responsible for the management of the Duikersvlei stream and its associated riparian area.</p>	11 August 2022	Ms. M. Groenink and Mr. P. King	Cullinan and Associates Inc. – Own and manage Montague Park	Thank you for your comment, it is noted.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>2. The Montague Park tenants include Makro, Decofurn, Takealot, Liberty Foods Cape Foods amongst others.</p> <p>3. On 7 July 2022, the Montague Park Owners Association first became aware of the proposed establishment of a crematorium by Ikamva Green Holdings, t/a Platinum Pride Crematorium ("the Applicant"), on Erf 2433 in Montague Gardens, upon receipt of written notification to it.</p> <p>4. On behalf of the Owners Association, comments are hereby submitted on the draft Basic Assessment Report ("DBAR"), dated (erroneously) November 2019, as well as the application for an atmospheric emissions licence, as contained in the Atmospheric Impact Assessment report by Yellow Tree, dated 24 May 2022.</p> <p>5. Our client's primary submission relates to the erroneous choice of process in this application in terms of section 24 of the National Environmental Management Act, 107 of 1998 ("NEMA"), which has also prejudiced its opportunities to participate in an application of this nature. It expects that it will have opportunities to raise and expand on its concerns further when a new Scoping</p>				<p>This is noted, and the I&amp;AP Register will be updated accordingly.</p> <p>It is noted that the Montague Park Owners were notified prior to Public Participation commencing.</p> <p>This is noted, November 2019, is the date of the template from DEA&amp;DP utilized for the BAR, as is reflected in the footer as well.</p>

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	& Environmental Impact Reporting process is commenced. Consequently, it reserves its rights to do so at the appropriate time.				Please refer to Section 2.3.3.7. of the Comments and Responses Report.
111.	<b>LISTED ACTIVITIES AND CHOICE OF PROCESS</b> 6. The DBAR identifies that Activity 14 of Listing Notice 1 (relating to the storage and handling of a dangerous good) and Activity 6 of Listing Notice 2 (activities which require a permit or licence relating to the generation or release of emissions, pollution of effluent) are triggered by the proposed crematorium development. However, it goes on to misinterpret an exclusion in the latter activity to conclude that “Listing Notice 2 is no longer applicable”, and accordingly that a basic assessment process must be followed, rather than a more comprehensive Scoping and Environmental Impact Reporting (“S&EIR”) process.				Thank you for your comment it is noted. Please refer to Section 2.3.3.7. of the Comments and Responses Report.
112.	7. Whilst it is accepted that Activity 14 of Listing Notice 1 is also triggered by the Applicant’s proposal, this is not to the exclusion of Activity 6 of Listing Notice 2, or vice versa. Regulation 15 of the				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	EIA Regulations, 2014, sets out how to determine which assessment process is applicable to an application. Sub-regulation (3) stipulates that S&EIR must be applied if the application is for two or more activities as part of the same development for which S&EIR must already be applied in respect of any of the activities.				
113.	8. The activity which requires an atmospheric emission licence, and therefore triggers Activity 6 of Listing Notice 2, is the activity identified in the List of Atmospheric Emission Activities in terms of the National Environmental Management: Air Quality Act, listed as subcategory 8.2, being "the cremation of human remains, companion animals (pets) and the incineration of veterinary waste". The storage of dangerous goods is not the activity which on its own requires an AEL. Consequently, both Activity 14 in Listing Notice 1 and Activity 6 of Listing Notice 2 are triggered, and S&EIR must be applied.				
114.					



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	This misinterpretation appears to stem from a "clarification meeting" held with Ms Taryn Dreyer of the Department of Environmental Affairs and Development Planning. The notes, as depicted on page 7 of the DBAR, state: "as per the exclusion listed in terms of Listing Notice 2, Activity 6 (a), specifies that is an activity is applicable in terms of Listing Notice 1 of 2014, then Listing Notice 2, Activity 6 is no longer applicable. If no other Listing Notice 2 trigger is applicable, then an EIA is not required, but a Basic Assessment is".				
115.	10. This is incorrect for a number of reasons. 10.1. Firstly, the above quotation is not the wording used in the activity, and alludes to a different meaning to that which is intended in Activity 6.				
116.	10.2. Secondly, the interpretation employed by the Applicant, EAP and seemingly DEA&DP, is nonsensical, in that all it would require for any applicant whose activities require an AEL to follow the less comprehensive application process, would be to trigger any less harmful activity under Listing Notice 1. The words				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	"activities which are identified and included in Listing Notice 1 of 2014" clearly relate to activities which require a permit or licence, or amendment, which are identified and included in Listing Notice 1, such as Activity 35 of Listing Notice 1. It does not mean that where any other Listing Notice 1 activity is triggered, in addition to Activity 6 of Listing Notice 2, then only a basic assessment process is required.				
117.	10.3. Thirdly, section 24(1) of NEMA requires that "the potential consequences or impacts on the environment of listed activities... must be considered, investigated, assessed and reported on". The assessment of impacts if therefore directly linked to the listed activities for which authorisation is sought. It makes no legal or practical sense that only the impacts of the dangerous goods activity in Listing Notice 1 should be assessed, where there are clearly air emission impacts that must also be assessed and considered.				<p>Thank you for your comment it is noted. Please refer to Section 2.3.3.7. of the Comments and Responses Report.</p> <p>The Air Quality impacts, were also addressed in the operational mitigation measures, as per Section H and in the EMPr.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
118.	11. Furthermore, the DBAR indicates that activities in Listing Notice 3 are also triggered <sup>1</sup> , but no Listing Notice 3 activities have been applied for. If the preconditions set out in the listed activity apply, then the activity must be included in the application. In particular, Activity 10 of Listing Notice 3 is indicated as “advised to be removed by DEA&DP”, but no justification is provided as to why this activity does not apply. In respect of Activity 12 of Listing Notice 3, the EAP concludes that because the vegetation is “extensively disturbed and contains alien invasives, waste and existing infrastructure, and will not be utilized for this development”, the activity is not triggered. It is not clear if nevertheless 300 square metres will be cleared for the development. If it will, then this activity is triggered, regardless of the level of alien infestation.				Thank you for your comment, it is noted. Please refer to Section 2.3.3.7. of the Comments and Responses Report.
119.	12. The erroneous choice of a basic assessment process is a fatal flaw in the application, which must be restarted as an application in terms of Part 3 of Chapter 4 of the EIA Regulations, following a full S&EIR process.				Thank you for your comment, please refer to Section 2.3.3.7. of the Comments and Responses Report.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
120.	<b>SMELL AND HEALTH IMPACT ISSUES</b> Inadequate assessment air emission impacts in the AIR				Thank you for your comment, it is noted.
121.	13. The Atmospheric Emissions Report prepared by Yellow Tree (dated 24 May 2022) ("AIR") identifies the air pollutants of concern for crematoria as being those substances for which minimum emission standards have been set in Activity 8.2 of the Listing Notice (i.e particulate matter (PM), carbon monoxide (CO), the oxides of nitrogen (NOx), and mercury (Hg)). The assessment undertaken in the AIR is therefore limited to these substances. The EMEP/EEA Air Pollutant Emission Inventory Guidebook (2019) however indicates that emissions of the following substances (in addition to the substances identified in Activity 8.2 of the Listing Notice) are also of concern in the context of cremation: <ul style="list-style-type: none"> <li>• hydrogen fluoride (HF)</li> <li>• hydrogen chloride (HCl)</li> <li>• non-methane volatile organic compounds (NMVOCs)</li> <li>• other heavy metals,</li> </ul>				Of the pollutants mentioned, National Ambient Air Quality Standards (NAAQS) only exist for benzene and lead. These pollutants were added to the air dispersion model. Please see page 22 of v3 of the AIR.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<ul style="list-style-type: none"> <li>some Persistent Organic Pollutants (POPs) (including dioxins and furans)</li> </ul>				
122.	14. Although assessment of the above emissions may not be required for an application for an AEL, it is nonetheless required for an assessment of environmental impacts in respect of an application for environmental authorisation (i.e during the BA or S&EIR process). This has not however been done for the DBAR.				
123.	15. The AIR is also flawed as it has failed to identify surrounding businesses as “sensitive receptors” (in addition to the six surrounding residential areas which are identified as such), and consequently has not assessed potential emissions-related impacts of the crematorium in that regard. People working at, and customers of, surrounding businesses will be exposed to air emissions from the crematorium on a daily basis. Aside from the potential health impacts associated with daily exposure, any odour related to the crematorium would also be regarded as				<p>Thank you for your comment, it is noted.</p> <p>As described on page 46 of the AIR, the plant boundary acts as a set of receptors for the surrounding businesses and members of the public who do not work at the crematorium.</p>



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	unpleasant given that it involves emissions from the cremation of dead bodies. While this will have a negative impact on the working environment for surrounding businesses, it will also affect the experience of customers visiting surrounding businesses. This may have significant implications for many of the businesses operating out of our client's office park (which include Takealot, Makro and Decofurn).				Please refer to Section 2.3.1. and 2.3.2. of the Comments and Responses Report.
124.	16. The AIR (and associated BAR or EIR) must therefore be revised to ensure that: 16.1. impacts related to emissions from all substances of concern are considered, and  16.2. surrounding businesses are identified in the AIR as sensitive receptors in order for potential emission-related impacts on those businesses to appropriately assessed.				Thank you for your comment, it is noted.
125.	Failure to consider odour-related impacts associated with the crematorium 17. The DBAR states that gases and odours will be completely combusted before exiting the stack during the cremation process. This statement is however contradicted by the Draft				Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.1. of the Comments and Responses Report.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Health Impact Assessment prepared by Sharples Environmental Services (dated July 2022) ("HIA") which states that:  "Foul odour may be emitted at the crematorium due to continuous incineration of organic matter. The problem is intensified if proper mitigation measures are not adopted. Odour is also emitted at the collection points if quick removal of wastes is not practised.				
126.	18. While the report goes on to propose mitigation measures, it is clear from the HIA that a foul odour may be generated at the crematorium from time to time, regardless of the implementation of those measures. Both the HIA and the AIR have however failed to undertake a comprehensive assessment of the impacts of such foul odours on surrounding business and residential areas.				Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.1. of the Comments and Responses Report.
127.	19. The explanation provided in the DBAR regarding how the crematorium may impact health and well-being <sup>5</sup> is consequently also deficient as it provides no consideration of				Thank you for your comment, it is noted. Please refer to the

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	the potential impacts of odour on the well-being of people living and working in the vicinity of the proposed crematorium. In this regard we note the following observation made by the Court in <i>Jacobs NO and Others v Hylton Grange (Pty) Ltd and Others</i> : <sup>6</sup> "Section 24(a) of the Constitution gives everyone the right 'to an environment that is not harmful to their health or well-being'. An environment will, in my view, be 'harmful' to a person's 'well-being' if it is repulsive to the senses of an ordinary person."				response as per Section 2.3.1 and 2.3.2. of the Comments and Responses Report.
128.	20. Any foul odour from the proposed crematorium will undoubtedly be repulsive to the senses of an ordinary person. A thorough assessment of odour-related impacts is therefore essential to understanding how the proposed project might impact the well-being of the people living and working in the area surrounding the proposed crematorium, as well as any negative impacts on surrounding businesses themselves. The HIA, AIR and DBAR or EIR must therefore all be revised to specifically address the potentially significant odour-related impacts associated with the proposed crematorium, particularly for surrounding businesses and residential areas.				Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.1. and 2.3.2. of the Comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
129.	Failure to undertake a socio-economic impact assessment 21. While the presence of the crematorium and any associated malodorous emissions would have significant implications for surrounding businesses for the reasons outlined above, the facility would also have a negative impact on desirability of the area as a business location (potentially causing a decrease in property values). The DBAR should therefore have included a socio-economic impact assessment which takes account of such considerations. Such assessment should therefore be undertaken any included in the revised BAR.				Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.2.4. of the Comments and Responses Report.
130.	Inadequate assessment of potential health impacts 22. As regards health impacts, the HIA acknowledges that "exposure to dangerous chemicals released by crematoriums raises concerns" and notes that "potentially dangerous pollutants produced by combustion processes include organic compounds (PCDD/Fs), mercury, and fine particles (PM2.5)." It goes on to state that "no studies have been identified that demonstrate a relationship between crematoria emissions and adverse health impacts, despite the fact that these compounds have been linked to a variety of negative health effects."				Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.1. the Comments and Responses Report. The Health Specialist has confirmed acknowledgement of this comment and has further addressed this aspect in the final Specialist report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
131.	23. Despite the acknowledgement in the HIA of potential negative health impacts, the report fails to provide a comprehensive assessment of the possible health impacts associated with the proposed crematorium. Instead, it provides a generalised assessment of potential health impacts related to mercury and PM emissions, without any analysis of potential health impacts related to emissions from all substances which will be emitted at the proposed crematorium.				<p>Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.1. of the Comments and Responses Report.</p> <p>The Health Impact Assessment (HIA) report has been updated to include potential health impacts related to emissions from all substances which will be emitted at the proposed crematorium.</p>
132.	24. While the "Key Findings and Recommendations" section in the HIA has been left blank, the conclusion section simply confirms that the cremator which will be used at the facility "is expected to significantly reduce emission and in turn reduce any health impact to the surrounding community which may occur due to the proposed Platinum Pride Crematorium Project". In other words, the HIA has simply relied on the fact that the cremator which will be used at the facility is designed to				<p>Thank you for your comment, it is noted. Please refer to the response as per Section 2.3.1. of the Comments and Responses Report.</p> <p>The Health Impact Assessment (HIA) report has been amended to include key findings and the</p>



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	reduce emissions without undertaking a proper assessment of potential health impacts associated with the actual air emissions that can be expected to arise in that regard.				potential health impacts have been addressed in the HIA.
133.	25. The inadequate assessment of health-related impacts must therefore be addressed in the revised HIA (and BAR / EIR).				Thank you for your comment, it is noted, the Rapid Appraisal Health Impact Assessment has been updated and included in the BAR. Also refer to the response as per Section 2.3.1. of the Comments and Responses Report.
134.	Proximity of proposed crematorium to habitable dwellings 26. Regulation 18(1)(a) of the Regulations Relating to the Management of Human Remains <sup>8</sup> requires that a crematorium must be located at least 500 m from any habitable dwelling.				Thank you for your comment, it is noted. Please refer to Section 2.3.3.3. of the Comments and Responses Report.
135.	27. According the DBAR, “the proposed crematorium is located approximately 552 m from the nearest area zoned for general residential use”. <sup>9</sup> However, from a review of Figure 14 and 15 in the DBAR, it appears that there may in fact be “habitable				

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>dwellings" located within 500m of the proposed crematorium site to the South West (in the area marked in pink as "Utility" on the zoning map in Figure 15). The zoning of an area is not necessarily determinative of whether habitable dwellings may be present. In the circumstances, the EAP must verify whether this is in fact the case and address this requirement in more detail in the revised BAR / EIR.</p>				
136.	<p><b>SITE SELECTION</b></p> <p>28. The DBAR focuses primarily on the fact that the preferred site is located in an industrial area, zoned to allow for the development of crematoria. Notably, the DBAR ultimately disregards Proposed Alternative 2 Site, due to its location adjacent to a shopping mall and public open space. However, it fails to assess the impact of the proposal on the Montague Business Park and its tenants, which is located adjacent to the preferred site, with its closest tenant being Decofurn Furniture Store. It also disregards its proximity to sports fields and facilities.</p> <p>29. In terms of the EIA Regulations, the DBAR is required to present reasonable and feasible options. There does not appear</p>				<p>Thank you for your comment, it is noted. Please refer to Section 2.3.3.4 of the Comments and Responses Report.</p>

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	to be a concerted effort by the EAP to consider reasonable and feasible site alternatives, with the only site alternative being one which did not have permission from the landowner for the establishment of a crematorium. It was therefore not a reasonable and feasible alternative to assess.				
137.	<b>ASSESSMENT OF NEED &amp; DESIRABILITY</b> 30. The DBAR relies on increased fatalities during the Covid-19 pandemic to a) demonstrate alignment with the City's Spatial Development Framework <sup>10</sup> ; and b) to establish need and desirability for the proposed crematorium <sup>11</sup> . However, the sources relied upon are dated 2020 and 2021, during the midst of the Covid-19 pandemic when fatality rates were peaking. As at the time of the DBAR preparation, the infection and fatality rates are significantly reduced, and these sources can no longer be relied upon, without further elaboration, to justify this proposal.				Thank you for your comment, it is noted. Please refer to Section 2.3.4. of the comments and Responses Report.
138.	31. Whilst the policies referred to in the DBAR do call for encouraging alternatives to in-ground burial, the actual demand for crematoria currently and in the future, and				

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	particularly this private crematorium in this location, have not been established. The DBAR refers to a number of media articles, but no credible feasibility assessment accompanies the proposal. There is no evidence in the DBAR that existing crematoria are unable to meet the current demand, or that the demand for crematorium facilities will increase in the years to come.				
139.	32. The DBAR fails to provide any details of employment figures, using generalised terminology to establish need and desirability, which does not contribute to a full and proper assessment of impacts required by NEMA. It concludes that the creation of multiple job opportunities and capital expenditure will have a high positive impact. With no specificity, it is impossible to conclude that the activity will have a high positive impact of this nature.				Thank you for your comment it is noted. Please refer to Section 2.3.4. of the comments and Responses Report.
140.	<b>USE OF FOSSIL FUELS</b> 33. The DBAR misrepresents the resource impacts by stating that natural gas will be used in the cremation process, and consequently that "natural gas is considered one of the cleanest				Thank you for your comment it is noted. Please refer to Section 2.3.3.8. of the comments and Responses Report.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	fuels for waste incineration processes when compared to coal or diesel. In future the use of biogas can be explored"12. LPG is identified as the most feasible and reasonable option in the DBAR13 and will be used in the incineration process. LPG is not a natural gas. Furthermore, LPG is produced from crude oil and is not "eco-friendly"14. The true impact of the resource use is understated and green-washed.				
141.	34. Furthermore, the risks associated with the LPG storage facilities, a major hazard installation, have not been comprehensively assessed, and the feasibility and impacts of retrofitting the facility to utilize biogas is unknown, and should be properly assessed if it is intended to be utilised.				Thank you for your comment it is noted. Please refer to Section 2.3.3.8. of the comments and Responses Report.
142.	<b>UNDERESTIMATED IMPACT RATINGS</b> 35. The DBAR finds that the potential impact and risk rating associated with a failure to comply with acceptable air quality standards, before mitigation, to be "Low"15 (page 129). This cannot be correct, given the potential impacts. It clearly also				Thank you for your comment it is noted. Please refer to Section 2.3.1. of the comments and Responses Report. The mitigation tables have been updated in the BAR.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	does not take into account the potential impact on the Montague Park, its tenants and customers.				
143.	36. The DBAR also finds the potential impact of the impact and risk rating of the LPG tanks before mitigation, to be "Low". This also cannot be correct, especially in light of the identified risk of explosion and impacts associated with "an asphyxiant gas that can cause unconsciousness and/or death is oxygen levels are sufficiently reduced" and frostbite.				Thank you for your comment it is noted. The BAR has been updated.
144.	<b>APPLICANT'S TRACK RECORD</b> 37. Whilst the applicant, Platinum Pride Crematorium, is said to be "familiar with the crematorium industry in the Western Cape" (page 105), no details of its experience in operating a crematorium or its ability to implement mitigation measures have been provided. These are critical aspect to determine the risks associated with the establishment of the facility and the potential impacts thereof.				Thank you for your comment it is noted. Please refer to Section 2.3.5.2. of the comments and Responses Report.
145.	<b>CONCLUSION</b>				



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	38. In order to cure the mis-application of the basic assessment process, the Applicant will be required to withdraw and resubmit a new application, following the S&EIR process prescribed by the EIA Regulations. In doing so, a number of issues identified in the DBAR, as identified above, will need to be rectified.				Thank you for your comment it is noted. Please refer to Section 2.3.3.7. of the comments and Responses Report. An additional 30-day public participation is being provided in line with the Basic Assessment Process, as the Proponent has chosen to opt for an extension, based on changes to the BAR and Specialist Reports.
146.	39. Given the potential impacts associated with an activity that requires an AEL, the appropriate level of assessment is identified in terms of NEMA, as requiring a full S&EIR process. This is for good reason. One such reason is to provide I&APs with an opportunity to participate at multiple stages, including at the stage of scoping potential impacts, which is even more important in matters which are technically complicated.				
147.	40. There was no bar to the EAP conducting a pre-application public participation process, where the process issue would have been identified and an application in terms of the correct process could have been submitted. The Applicant and/or EAP chose not to do so.				Thank you for your comment, it is noted. Please refer to Section 2.3.3.7. of the Comments and Responses Table.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
148.	41. Our client has therefore been prejudiced by the use of a less comprehensive basic assessment process, by being afforded only one opportunity to participate and to comment on documents which are technically complicated. It anticipates that a new application will be made, following a S&EIR process, and that it will be provided with further and adequate opportunity to do so. It therefore reserves its rights to make new and expanded comments in any further participation processes.				Thank you for your comment, it is noted. Please refer to Section 2.3.3.7. of the Comments and Responses Table.
149.	42. Our client requests that it be informed of, and invited to comments on, any and all other applications for permissions that may be required for this development, including but not limited to the application for an AEL, any application for a water use licence or registration in terms of a general authorisation, and any application for exemption in terms of the National Health Act.				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
150.	<p>Thank you so much for your assistance.</p> <p>I also thank you for receiving and approving my application to register as an I&amp;AP.</p> <p>Comment: I am 100% in support of the building of the crematorium facility because a lot of graves are getting full and more land is required to establish and build more graveyards. I believe that this land could have been used to build facilities that will be beneficial to the community, such as building more shopping centres that would create more employment opportunities and more community centres which will serve different purposes to the community. We all know that there is a land crisis in Cape Town for people wanting to build themselves homes, so extending graves will only make the situation worse. People will end up settling in places and land they are not to occupy. These past years, there has been an increased number of reports of stolen graves(coffins and Tombstones). I believe that the establishment of the crematorium facility will minimize and decrease these sorts of crimes because a lot of people who choose to cremate their loved ones opt to finish the process of</p>	03 August 2022	I&AP 8	Private individual	<p>Thank you for your comment, it is noted.</p> <p>You are welcome.</p> <p>Your support is noted.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	'throwing' away the ashes in the beach this means they will not be at risk of getting their loved ones grave stolen and sold.				
151.	My biggest concern in the establishment of this facility is the amount of pollution it will produce, especially Carbon dioxide. The environment is currently experiencing increased levels in the atmosphere as a result of deforestation, combustion etc. as a result a lot of people are living with respiratory diseases. With that being said, this facility will add to be a problem we are currently trying to fix by trying to take in the excess Carbon dioxide in the atmosphere and giving off more oxygen. I hope there a way in which the the cremation services are carried out: i.e a specific day or days of the week and a time duration to avoid having the services everyday and at extended time just to avoid putting strain on the environment.				Thank you for your comment, it is noted. Please refer to Section 2.3.1.1. of the Comments and Responses Table.
152.	I hope this email finds you well. Kindly find listed below my comments relating to the Basic Assessment reports relating to the 16/3/3/1/A1/20/3027/22 project:	08 August 2022	I&AP 7	Private Individual	Thank you for your comment, it is noted. Please refer to Appendix

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	1) Were the surrounding landowners/tenants of the seemingly abandoned surrounding buildings eventually contacted? Their insights could provide information as to the factors which contributed to these buildings being left empty and could in turn negatively impact upon the construction and running of the proposed crematorium.				C of the Comments and Responses Report.
153.	2) There is a need for more information regarding possible noise pollution especially as the report suggests that the crematorium is intended to run 24/7. There has been made minimal mention of the methods which will be used to circumvent possible noise pollution and I would like to receive more clarity regarding this.				Thank you for your comment, it is noted. Please refer to section 2.3.2.5 and 2.3.3.1 of the Comments and Responses Report.
154.	3) The report does not make mention of the cultural backgrounds of surrounding landowners/occupants. As cremation may not be seen as an acceptable post-death practice by all cultural groups present in or who frequent the area, the crematorium may arise as a point of contention within the local community. Especially as the proposed plot is near various busy businesses and sports complexes.				Thank you for your comment, it has been noted. Please refer to section 2.3.2.3 of the Comments and Responses Report.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Thanking you for taking my concerns into consideration.				
REQUEST TO BE REGISTERED					
155.	<p>Can you please add our details, as listed below to the list of opposition to this development?</p> <p>We are already having the refinery on the one side, and cannot afford another facility impacting on air quality that will for sure have an negative impact on a number of our staff members.</p> <p>Should such a development take place we will have to consider moving our business.</p>	29 July 2022	Mr. A. Barnard	Berlin Packaging	<p>Thank you for your comment, it is noted and you have been included as an I&amp;AP.</p> <p>Kindly refer to Section 2.3.1. for a detailed discussion.</p>
156.	<p>Good Day</p> <p>We would like to register as “<b>Definitely being against the above application</b>”. We are an International Health Company situated in Montague Gardens.</p> <p>My contact details are as below, and I would prefer to receive any correspondence by email please.</p>	01 August 2022	Ms. J. Finlayson	NeoLife International (Pty) Ltd	<p>Thank you for your comment, it is noted.</p>



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Should there be anything else that you require, please do not hesitate to contact me.				
157.	<p>We would like to register as an Interested &amp; Affected Party ("I&amp;AP") in the proposed erection of a Crematorium on Erf 2433 Montague Gardens.</p> <p>Our company, situated in Montague Park, is a manufacturer of personal care products. Our raw materials, and the products that we manufacture, are subject to high standards of quality and product safety, and our company adheres to strict requirements in relation to their storage and manufacturing conditions – which may be at risk as a result of the proposed development.</p> <p>Our company can be reached by return email or on any of the methods given below.</p>	08 August 2022	Ms. B. Shepherd	VVF Life Sciences South Africa (Pty) Ltd	<p>Thank you for your comment, it is noted.</p> <p>The Health Specialist has confirmed the following:</p> <p>Crematoria are often considered to be rather small-scale installations with relatively low total emissions. Potential effects on human health have been discussed in the Rapid Appraisal Health Impact Assessment Report.</p>
158.	Furniture Force (Pty) Ltd, trading as Decofurn hereby wishes to formally object to the proposed establishment of a crematorium facility on ERF 2433, Montague Gardens, City Of Cape Town Metropolitan Municipality, Western Cape.	10 August 2022	Mr. D. Neethling	Furniture Force (Pty) Ltd trading as Decofurn	The Air Quality Specialist has confirmed that these impacts were assessed in AIR.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Listed below are a few reasons why we feel it necessary to object.				
159.	1.The process of cremation generates numerous harmful air pollutants, which could have severe effects on the surrounding environment and human health.				Please refer to the discussion as per Section 2.3.1 of the Comments and Responses Report.
160.	2.Concerned that even though particulate emissions could be controlled to some extent, it is extremely difficult to remove all odours.				
161.	3.The position is unsuitable, as we are a fully-fledged retailer, and there are other retailer in close proximity.				Thank you for your comment, it is noted. Please refer to Section 2.3.3.4. of the Comments and Responses Report.
162.	4.Visible particulate matter, or smoke is an actionable concern.				Thank you for your comment, it is noted.  Please refer to Section 3.2 of the Comments and Responses Report. In addition, refer to specialists response as per point 104.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
163.	5.Definitely has a stigma attached to it.				Thank you for your comment, it is noted. Kindly refer to Section 2.3.2. of the Comments and Responses Report.
164.	<p><b>RE: PUBLIC PARTICIPATION COMMENTING PERIOD ON THE DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY, WESTERN CAPE</b></p> <p>1. We refer to the above and the Draft Basic Assessment Report ("DBAR") and application for an atmospheric emission licence ("AEL"), made in accordance with the National Environmental Management Act No. 107 of 1998 ("NEMA"), together with the Environmental Impact Assessment Regulations 2014 (as amended 2017) ("EIAR") regarding the proposed establishment of a crematorium facility on Erf 2433, Montague Gardens ("the Proposed Crematorium") in the City of Cape Town, Metropolitan Municipality, Western Cape.</p>	10 August 2022	Ms. T. Sekgobela	Takealot.com	Thank you for your comment, it is noted.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>2. We make the comments below as a registered interested and affected party ("<b>I&amp;AP</b>") on behalf of Takealot Online (RF) Pty Ltd ("<b>Takealot</b>", "<b>Takealot.com</b>", "<b>us</b>" and/or "<b>we</b>"), following the call for public comment in terms of Chapter 6 of the EIAR and section 38 of the National Environmental Management: Air Quality Act No. 39 of 2004 ("<b>Air Quality Act</b>") issued by Sharples Environmental Services.cc and Yellow Tree (Pty) Ltd, dated 6 July 2022.</p> <p>3. Please note that the comments below made on behalf of Takealot are no exhaustive. We reserve our rights to make further comments as an I&amp;AP and as the process developments until the final phases. Further, these comments relate to both the DBAR and AEL.</p>				
165.	<p><b>COMMENTS</b></p> <p>4. We begin by setting out our main and overarching comment in relation to the Proposed Crematorium and as an I&amp;AP. Takealot operates a warehouse in Montague Garden, approximately 0.33 kilometres (aerial measurement) from the location of the Proposed Crematorium. Our operations at our Montague Gardens warehouse consists of, <i>inter alia</i>, more than 1000 people, either employees, contractors and/or visitors. On a</p>				<p>Thank you for comment, it is noted.</p> <p>The Health Specialist has confirmed the following: Crematoria are often considered to be rather small-scale</p>

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	day-to-day, there are approximately 1200 employees working in our warehouse on 12 hour shifts for 24 hours a day. This number of employees increases to 2200 during peak season. Significantly, as a retailer of fast-moving consumer goods to end consumers, Takealot receives and stores goods that are legislatively mandated to be stored in specific conditions from a consumer health and safety perspective, as well as a general consumer protection perspective. Some of these goods consist of food grade and pet grade products which reach over 5 million homes in South Africa. It is broadly on this premise that our submissions focus on the potential for any exposure to air contamination posing a significant and direct health risk to our employees, contractors and/or visitors, as well as the potential contamination of goods stored therein. Both these risks also pose a real and significant commercial risk to our business.				installations with relatively low total emissions. The relative contribution of an individual crematorium to local air pollution will depend on the other potential sources of pollutants in the vicinity, the number of cremations and composition of the remains, the design of the system, the operation of the cremator, and emissions control measures.  See Section 2.3.1.2. of the comments and responses report.
166.	5. We highlight the following risks, set out in the table below, in reference to the DBAR and AEL.  <b>Air emission risk(s)</b> Nature of risk(s) identified in the DBAR and/or AEL:				Thank you for your comment, it is noted. Please refer to Section 2.3.1. of the Comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<ul style="list-style-type: none"> <li>Ambient PM10 (particulate matter), PM2.5, CO (carbon monoxide), and mercury concentrations at the fence line of the site are predicted to remain in compliance with the NAAQS standards (and the international guideline for mercury), if commissioned.</li> <li>Ambient hourly NO2 (nitrogen dioxide) concentrations at the fence line are predicted to exceed the hourly NAAQS standard. However, the concentration rapidly decreases, and no NAAQS exceedances are predicted at any sensitive receptors. The ambient annual NO2 concentration at the fence line is predicted to comply with the annual NAAQS for NO2.</li> <li>As per the Atmospheric Impact Assessment, the height of the 6 stacks will be 12m above ground level and ~6m above the nearby building. The minimum combustion temperatures as provided by the furnaces manufacturer will be complied with before undertaking any cremation. Regulations 18(d) through (g) shall be complied with based on the Atmospheric Emission Impact Assessment Report, the mitigation tables set out in the BAR and the control measures translated into the EMPr.</li> </ul>				<p>The Air Quality Specialist has confirmed that the NO<sub>2</sub> risks to be included in the final Specialist Report and will be integrated into the BAR.</p> <p>Thank you for your comment. Please note that this has been updated in the Rapid Appraisal Health Impact Assessment Report.</p>



COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>Concern by Takealot:</p> <ul style="list-style-type: none"> <li>The DBAR and AEL (as well as the health impact assessment) does not clearly set out the risk(s) that NO2 (nitrogen dioxide) poses to humans. Our understanding is that elevated levels of NO2 can cause damage to the human respiratory system and increase a person's vulnerability to, and the severity of, respiratory infections and asthma.</li> </ul>				<p>Please see Section 2.3.1.2. of the Comments and Responses Report.</p>
167.	<p><b>Health risk(s)</b></p> <p>Nature of risk(s) identified in the DBAR and/or AEL:</p> <ul style="list-style-type: none"> <li>The report by the Health Specialist suggests that with technology intended to be adopted, the Proposed Crematorium's emissions will be significantly reduced, and in turn will reduce the potential health impacts.</li> </ul> <p>Concern by Takealot:</p> <ul style="list-style-type: none"> <li>Our concern is that the report of the Health Specialist is premised on assumption that the relevant technologies will be available and applied to mitigate health risks and impact. However, the DBAR and AEL does set out what the technology is and how that specific technology will</li> </ul>				<p>Thank you for the comment, it is noted.</p> <p>Thank you for your comment. Please refer top response as per Section 2.3.1. and 2.3.3.1. of the</p>

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	be utilised in the Proposed Crematorium to mitigate the health risks and impact.				Comments and Responses Report.
168.	<p><b>Contamination risk(s)</b></p> <p>Nature of risk(s) identified in the DBAR and/or AEL:</p> <ul style="list-style-type: none"> <li>Possible smoke particles in proximity to our warehouse poses a direct threat to food grade products stored therein as well as our inbound area which is on the facing end of the crematorium.</li> </ul> <p>Concern by Takealot:</p> <ul style="list-style-type: none"> <li>As stated above, our overarching concern in relation to the location of the Proposed Crematorium is that it poses a direct and real risk to food grade products stored in our warehouses which is a health risk to our end consumers, employees at the warehouse as well as visitors and contractors that attend to our warehouse from time-to-time. Any contamination of this nature also poses a significant regulatory compliance risk as well as financial risk.</li> </ul>				<p>Thank you for the comment, it is noted. Please refer to Section 2.3.1. of the Comments and Responses Report.</p> <p>Please refer to Section 2.3.1. of the Comments and Responses Report.</p>

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	6. We reiterate, that the comments above are in no way exhaustive and we reserve our rights to supplement them as this process develops.				
169.	<p><b><u>RE: NOTIFICATION OF THE 30-DAY PUBLIC PARTICIPATION COMMENTING PERIOD (11TH JULY 2022 – 10TH OF AUGUST 2022 FOR THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT CBAR). AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (107 OF 1998) AND THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT (39 OF 2004). RESPECTIVELY</u></b></p> <p><b>1. Project Background Critical Comment and Review.</b> We refer to our earlier communication with regards to the above matter. Kindly find herewith our critical review of the matter concerning the proposed development.</p>	29 August 2022	C. Steyn	Massmart Wholesale (Pty) Ltd t/a) Makro	Thank you for the comment, it is noted.
170.	<p><b>2. Critical Review of Documents Made Available for Public Review.</b></p> <p><b><u>Documentation Assessed</u></b></p>				

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	The relevant documents were downloaded from the SES website, which is considered to contain all the relevant information available for critical review. The documents reviewed included the Draft Basic Assessment Report (BAR) and associated appendixes as downloaded from <a href="https://sescc.net/eia-report/draft-post-application-basic-assessment-report-for-the-proposed-constructionof-a-storage-facility-on-erf-21275-aalwyndal-mossel-bay-western-cape/">https://sescc.net/eia-report/draft-post-application-basic-assessment-report-for-the-proposed-constructionof-a-storage-facility-on-erf-21275-aalwyndal-mossel-bay-western-cape/</a> . The AEL application was requested, but from the response received from the EAP appears to not yet be available and the only information related to this at present is the Atmospheric Impact Assessment report, which is included in this review.				Thank you for the comment, it is noted. The content of the specialist report will be used for the AEL Application.
171.	<p><b><u>Potential Shortcomings of the EIA</u></b></p> <p>During the critical review of the documents, the following potential shortcomings of the Environmental Impact Assessment (EIA) process were identified:</p> <p>(a) Listed activities potentially omitted and/or incorrectly excluded from the application;</p>				Thank you for the comment, it is noted. Please refer to Section 2.3. of the Comments and Responses Report.

**APPENDIX D: COMMENTS AND RESPONSE TABLE****COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
172.	(b) Contamination risks and decommissioning requirements of existing / previous property uses;				
173.	(c) Location of the crematorium within 500m of a habitable dwelling in contravention of the National Health Act' as well contradictions in the reporting of the relevant distances;				
174.	(d) Reliance on type of technology to avoid significant environmental issues without any scientific background, comparative studies, technical drawings or machinery maintenance plan;				
175.	(e) Exclusion of a detailed socio-economic assessment and associated considerations;				
176.	(f) Incorrect conclusions with regards to health impacts associated with emissions from crematoria;				
177.	(g) Safety and fire risks associated with the storage and use of Liquefied petroleum gas (LPG);				
178.	(h) Lack of information and assessment of waste-related considerations;				
179.	(i) Lack of specialist input into potentially significant traffic impacts;				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
180.	(j) Incorrect statements with regards to the need and desirability of the project;				
181.	(k) Permits and additional authorisations required from provincial and local government departments together with the requirement of additional reports that should be made available for public comment and input;				
182.	(l) Potential requirements for a 1:100 year flood delineation in terms of the nearby watercourse;				
183.	(m) Consideration of alternatives;				
184.	(n) Shortcomings in the impact assessment including: i. Incorrect interpretation of the No-Go alternative and associated impacts rating outcomes; ii. Key impacts omitted from the detailed impact assessment and summary of findings; iii. Incorrect implementation of impact assessment methodology and/or rating of impact significance; iv. Incorrect/lacking information in the Environmental Impact Statement, EAP recommendations, and EA requirements;				



## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
185.	<p>(p) Health impact assessment excluded key considerations such as:</p> <p>i. No mention of health impacts on areas (and people) outside the crematorium (limited to impacts on workers in crematorium), despite noting the HIA assesses impacts on community health;</p> <p>ii. No implementation of any methodology regarding the assessment of health impacts;</p> <p>iii. No recommendations regarding potential mitigation or specific monitoring requirements.</p> <p>The abovementioned list will be detailed in the sections that follow.</p>				
186.	<p>(a) <b>Listed Activities</b></p> <p>The exclusion of Listing Notice 2, Activity 6 (The development of facilities or infrastructure for any process or activity which requires a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent) is believed to be a major shortcoming of the EIA process. It is</p>				<p>Thank you for the comment, it is noted. Please refer to Section 2.3.3.7. of the Comments and Responses Report.</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	believed that this activity does in fact apply and therefore the development should be subject to a full Scoping and Environmental Impact Report (S&EIR) process and not a Basic Assessment process.				
187.	Further to this, it is evident from the authority correspondence (Appendix E22) that the original process prescribed for the proposed development was an S&EIR. The possibility of implementing the exclusion related to Listing Notice 2 Activity 6 was potentially brought forward prior to the confirmation that any Listing Notice 1 activities would even be applicable. It is therefore possible that the original application did not include the 80m3 LPG component and that this was only added for the purposes of potentially avoiding an S&EIR process. In Appendix E22, the communication with the competent authority is limited to the DEADP responses only. In order to obtain a true reflection of the communications, the submissions made by the EAP to the DEADP should also be provided. If the interpretation implemented by the EAP is permitted, this will set a precedent for future applications whereby an S&EIR process for emitting activities can be avoided simply by including a Listing Notice 1 activity in the application. It is believed that this is a fatal flaw				

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	with the application process undertaken for the proposed development.				
188.	<p>(b) <b><u>Contamination Risks and Decommissioning Requirements</u></b></p> <p>The Draft BAR provides limited information on the activities that were historically or are currently undertaken at the site other than to state that “the site is currently being utilized by Crous Chemicals cc., an organization that manufactures chemical products for a variety of industries” (Page 4 of the Draft BAR). It is unclear whether the previous or current activities would have required an Environmental Authorisation (EA), Waste Management Licence (WML), Air Emissions Licence (AEL) or similar authorisations. Should this be the case, Activity 31 in Listing Notice 1 should apply (“The decommissioning of existing facilities, structures or infrastructure...”).</p> <p>Whether the abovementioned Listed Activity is applicable or not, the historical and current activities at the site suggest the potential for contamination of the site in the form of storage of potentially hazardous wastes, with subsequent potential for contamination of soil, surface water, groundwater and/or air</p>				<p>Thank you for the comment, it is noted. Please refer to Section 2.3.3.2. of the Comments and Responses Report.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	quality. This investigation, together with any required remedial action, should be undertaken prior to the approval of any new development. No investigation into these issues was included in the Draft BAR, which is believed to be a major flaw in the impact assessment process for the proposed development.				
189.	<p>(c) <b><u>Contravention of National Health Act Regulations</u></b></p> <p>In terms of the National Health Act, the Regulations Relating to the Management of Human Remains – Minimum requirements for a cremation facility, “the site must be located at least 500m from any habitable dwelling”. There are a number of buildings within the 500m radius of the site that are populated with significant numbers of staff and consumers on a daily basis. The definition for “habitability” provided on page 25 of the Draft BAR does not exclude business space and is not limited to residential houses. Whether the buildings in proximity to the proposed development fall within the definition of “habitable dwelling” is superfluous as the intention of the regulation is to prevent any adverse health impacts associated with the operation of a crematorium facility. A commercial property located within the 500m radius of the crematorium would in fact have a</p>				<p>Thank you for the comment, it is noted. Please refer to Section 2.3.3.3. of the Comments and Responses Report.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	significantly larger populous than any residential dwelling and, due to the likely operational hours of the crematorium being similar to that of the commercial activities, the health impacts would still be very relevant to any populated buildings in close proximity. On page 25 of the Draft BAR, it is stated that “the proposed crematorium is located ~552 m from the nearest area zoned for general residential use”. The Draft BAR (Page 11) states that “the Atmospheric Impact Assessment advises that the Milnerton residential area is located 300 metres to the East of the site”, which is contradiction of the statement on page 25 and also confirms that the positioning of the proposed development would be in contravention of the National Health Act regulations.				
190.	It is noted that an exclusion can be obtained in terms of the abovementioned regulation, but there is no detail as to the process and motivation for obtaining approval of such an exclusion. The application for this exclusion should, at minimum, be subject to comment and input from the property owners located within the regulated 500m area. It is believed that the Environmental Authorisation for the proposed development should not be granted until such time that the abovementioned				

COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	exemption process has been undertaken as per any legislated requirements and has been approved (subject to any relevant appeals). However, it is believed that the exemption should not be granted based on potential health impacts to the surrounding businesses and their consumers.				
191.	<p>(d) <b><u>Proposed Technology</u></b></p> <p>The main mitigative factor presented for the prevention of adverse air quality and health impacts associated with the proposed development is the type of technology that is proposed to be implemented. While significant detail is provided on the specifications of the preferred cremation technology, there are no alternative cremation technologies presented that can be assessed for comparative purposes. Further to this, there is no scientific background provided on the stated benefits associated with the proposed cremation technology, nor are any technical drawings or designs provided in the Draft BAR or associated appendixes. Page 21 of the Draft BAR lists the benefits of the cremator set-up, but there is no indication of any potential disadvantages or drawbacks to the proposed</p>				<p>Thank you for the comment, it is noted. Please refer to Section 2.3.3.1 and 2.3.3.4. of the Comments and Responses Report.</p>



**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	technology, nor any comparison to other available technologies and their potential benefits and disadvantages.				
192.	Page 21 of the Draft BAR states "if managed and operated as per specifications, maintenance is not required for up to 5 years, minimum." It is likely that the preferred cremation technology (and its associated benefits) would be subject to ongoing and regular maintenance, but no plan is specified for the monitoring of such maintenance. There should be a plan stipulated and strict conditions implemented for maintenance and replacement after 5 years. Cremation machines/furnaces must be properly and regularly maintained and modifications/updates of the software programme need to be undertaken in order to efficiently and effectively undertake a proper cremation. Without the monitoring of the maintenance being undertaken by an independent external professional (e.g. engineer), the mitigative factor associated with the preferred cremation technology cannot be managed. Unless this is included as a condition of the Environmental Authorisation, the granting of an EA for the proposed development is believed to be fatally flawed.				Thank you for your comment. As per the EMP the relevant plans will be compiled prior to commencement of the operational phase. The operational plans will be issued by the manufacturer, and maintenance periods recommended. Given the specifications of the technology and the recommended monitoring by the operators, should there be any inadequacies noted, the manufacturer will be contacted to address this.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
193.	<p>(e) <b><u>Socio-Economic Considerations</u></b></p> <p>A significant aspect of the proposed development is the socio-economic impact that the proposed crematorium will have in terms of a local and regional context. There are a number of social and economic factors associated with the proposed development (most notably the perception thereof) that have not been addressed in detail in the Draft BAR. Page 86 of the Draft BAR refers to the concerns that may come to mind for the surrounding community members and states that "SES has endeavoured to address these issues with facts, based on the proposal and informed by specialist input." The reason for exclusion of a Socio-Economic Assessment is "based on the footprint of the existing warehouse facility not being altered" (page 41 of the Draft BAR) and the fact that "the proposed development is in line with the City of Cape Town's Integrated Development Plan and Spatial Development Framework objectives and will contribute towards the need for increased cremation capacity in the City. The planning context and socio-economic aspects will be addressed in the Basic Assessment Report (BAR). And as such a socio-economic assessment is not warranted." (Item 5.3.7 in DEADP Correspondence dated 14</p>				<p>Thank you for the comment, it is noted. Please refer to Section 2.3.4. of the Comments and Responses Report.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	June 2022). This study should not be excluded based on the footprint or its alignment with spatial planning and need for cremation capacity, as the proposed development has potential social impacts that need to be assessed and addressed correctly.				
194.	Page 83 to 89 of the Draft BAR describes the 'Social Aspects' of the proposed development. The initial section does not talk to the impact on surrounding commercial operators and the social perception associated with a crematorium in close proximity to places where people work and do their shopping. The report states that "the proposed project is justifiably needed and desirable in terms of the social, economic and ecological needs of the community", but this is not substantiated by any socio-economic or consumer data. While the proposed crematorium is perhaps needed for the wider CoCT area, it is not necessarily desirable for this particular site and it is critical that all potential impacts associated therewith are adequately assessed and addressed. The effects on consumer and worker behaviour are not unpacked in any detail as should be addressed in a detailed Socio-Economic Assessment. The section detailing 'Perceptions and Sense of Place' (page 88 of the Draft BAR) does not address				Please refer to section 2.3.2 of the Comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	possible impact on businesses in the area as a result of people's perceptions of crematoria. It further notes that "although there are negative social perceptions in terms of the vicinity to crematoriums, facts to keep in mind include...", continues to note that some religions recognise cremations as a standard and necessary practice, and that cemeteries are not sustainable and have negative environmental impacts. Although both these statements may be true, it is of little relevance when the requirement is to identify and assess potential socio-economic impacts that may arise from the proposed crematorium development.				
195.	Page 153 of the Draft BAR lists the negative impacts on the surrounding community and includes "general unease being close to a crematorium facility." This is a permanent factor and is related to perceptions which cannot easily be changed. This will influence consumer behaviour and may result in negative economic impacts on surrounding businesses leading to job losses etc. Further to this, the impact on the emotional/psychological health of people that work in the surrounding areas needs to be considered. People working nearby will be seeing smoke from cremation activities and				Thank you for the comment, it is noted. Please refer to Section 2.3.1. and 2.3.2. of the Comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>vehicles delivering cadavers. Some people may be very susceptible to this in terms of mental and emotional wellbeing and could have a negative social impact in this regard. Nowhere in the Draft BAR is the potential impact as a result of the social perception surrounding crematoria and the subsequent socio-economic impacts on both community members and surrounding business owners' psychological, emotional and financial wellbeing assessed.</p> <p>The omission of a detailed Socio-Economic Impact Assessment is believed to be a fatal flaw in the impact assessment process for the proposed development.</p>				
196.	<p>(f) <b><u>Health Impacts Associated with Crematoria</u></b></p> <p>On several occasions within the Draft BAR and Health Impact Assessment (HIA), the following statement is used to negate the potential health impacts associated with the proposed development: "...no studies have been identified that demonstrate a relationship between crematoria emissions and adverse health impacts..." Upon conducting a basic scholastic</p>				<p>Thank you for the comment, it is noted. Please refer to Section 2.3.1. of the Comments and Responses Report.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	internet search, a number of studies were found to clearly refute the above statement.				
197.	Further to this, the Draft BAR (Page 2) states that “the Specialist acknowledges that design and operations parameters play a significant role in ensuring reduced emissions caused by the cremating processes. Based on the Johnson Thermal Engineering cremator proposed to be utilized, it is expected to significantly reduce emission and in turn reduce any health impact to the surrounding community which may occur due to the proposed Platinum Pride Crematorium Project.” Similarly, the Draft BAR refers to Atmospheric Impact Assessment concluding that “the proposed crematorium was predicted to have a limited effect on air quality in the area” and benefits will include “reduced CO2 emission”. The terms ‘reduced’ and ‘limited’ do not mean that the emissions or health impacts are negated and are simply a comparative terms utilised to provide the impression that the proposed cremation processes would not have significant environmental and health impacts. The proposed development will still contribute to cumulative air pollution. The potential impacts and cumulative impacts of the proposed crematorium development on the air quality and associated				



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>health of the surrounding community is not quantified and assessed anywhere within the Draft BAR and specialist studies and only statements of relative “reduction” of impacts (compared to something which is also not specified) is provided.</p> <p>The use of the abovementioned statement and terminology within the Draft BAR and specialist studies and lack of any quantifiable assessment of impacts on community health based on actual data is thus believed to be a major flaw in the impact assessment process for the proposed development.</p>				
198.	<p>(g) <b><u>Safety and Fire Risks</u></b></p> <p>The proposed LPG requirements for the development and associated storage of 80m<sup>3</sup> thereof has the potential to pose a significant safety and fire risk, not only to the site itself, but also to surrounding areas. The combustion energy and associated temperatures could result in safety concerns, fire risks and, in extreme circumstances, explosions that may result in serious injuries or even deaths. On page 87 of the Draft BAR, the disadvantages associated with the use of LPG gas are listed as ‘usually more expensive than diesel; can be difficult to source</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	(growing market); strict handling and management; and extensive conditions required in terms of legislation compliance'. If the storage and handling of the LPG gas is not undertaken correctly, it could result in major risks to safety for workers at the site, as well as the surrounding areas. The Draft BAR does not make mention of any requirements in terms of Major Hazardous Installations (MHI) and the associated risk assessment that would be required. The outcome of such a study would be crucial to the environmental impact assessment and the determination of whether such a development should be granted an EA or not. The omission of this aspect is considered to be a major flaw in the impact assessment process for the proposed development.				Thank you for the comment, it is noted. Please refer to Section 2.3.3.6. of the Comments and Responses Report.
199.	(h) <b><u>Waste-related Considerations</u></b>  There is limited detail regarding the wastes associated with such a development, specifically during the operational phase. As a minimum, an estimated waste inventory should be provided to determine the type and volumes of waste associated with the development. It is assumed there would be more than just 'ashes' associated with the operation of the crematorium. If not, the volume of 'ashes' needs to be provided and it needs to be				Thank you for the comment, it is noted. Please refer to Section 2.3.1.5. of the Comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	confirmed how this is stored and disposed of by the operator. This information should be made available to the public for commenting purposes. Although the Draft BAR provided for the assessment of waste management during the 'planning, design and development phase', there is no impact assessment on this aspect pertaining to the operational phase. A mitigation in the "Operational Air Quality Health and Odour Impacts" includes ensuring that wastewater is collected and disposed of as per permits/licences (Page 130 of the Draft BAR), but no mention is made of type or volume of expected wastewater to be generated from the proposed operation of the facility within the Draft BAR or any of the other supporting documentation. Reference is again made under the "Contamination of stormwater" to potential contamination that may occur from leaks/spills of chemicals used on site as well as washing/maintaining of ash trays, the facility or infrastructure. However, the operation of the site, chemicals and processes involved are not explained in any section of the document, and therefore there is no knowledge of types and volumes of chemicals that will be utilised and stored on site, nor any ability to identify potential activities or portions of the operations of the				

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	crematorium on site where there is a risk for such contamination or the need for capture and disposal of (presumably contaminated) wastewater.				
200.	Operational solid waste in the form of “funeral paraphernalia” is noted on page 145 of the Draft BAR – this waste volume is not quantified anywhere in the Draft BAR and its storage and handling is not addressed other than to note that storage should be inside the facility (no indication of where on site or within the facility this may be) and mindful of visual triggers. In Section J 4 (Waste) in the Draft BAR, the only reference to operational wastes are those associated with ‘waste receptacles’, ‘separation of waste’ and ‘littering’, with no mention of the disposal of ashes and any other solid or liquid waste by-products from the process or activities on site. The management of ash wastes from a facility that has the capacity to cremate up to 144 cadavers per day should be a key issue assessed in the EIA process and the omission therefore is believed to be a fatal flaw.				
201.	It is evident from the above that solid and liquid wastes will be generated by the operation of the crematorium. The lack of any detail on the types and anticipated volumes to be generated during operation and the proposed storage, handling and				

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	disposal of such wastes, and subsequent lack of assessment of impacts thereof is deemed a critical shortcoming of the assessment.				
202.	<p>(i) <b><u>Traffic Impacts</u></b></p> <p>The following statement is included in the Draft BAR: "Traffic during the operational phase is anticipated to be minor". There is no estimated number of trips per day indicated in the Draft BAR. If the facility can accept up to 144 cadavers per day, then that could translate to up to 144 trips in and out of the site on a daily basis (i.e. an approximate average of 18 trips per hour during normal working hours). This excludes staff vehicles, delivery vehicles and waste removal trucks which would contribute to the traffic flow. This is not necessarily 'minor' and the impact assessment of traffic during the operational phase should be assessed by a suitably qualified Traffic Impact Assessment (TIA) specialists.</p>				Thank you for the comment, it is noted. Please refer to Section 2.3.3.8. of the Comments and Responses Report.
203.	<p>(j) <b><u>Need and Desirability</u></b></p> <p>Figure 24 of the Draft BAR (Page 50) indicates the location of existing crematorium facilities and funeral parlours. Based on the general distribution of the funeral parlours (as well as the general</p>				Thank you for the comment, it is noted. Please refer to Section

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	distribution of populated areas throughout the City of Cape Town), the City would be better served by having a new crematorium in the southern suburbs of the metropolitan area as opposed to the proposed location.				2.3.3.2. of the Comments and Responses Report.
204.	The need for the development also makes mention of the COVID-19 pandemic and that this had 'placed substantial demand on existing crematoria in the municipality.' However, due to the roll-out of vaccinations from early 2021, the number of fatalities resulting from the pandemic have reduced significantly even to the point where the State of Disaster was lifted in June 2022. The need for a new crematorium in relation to the pandemic is therefore no longer warranted.				
205.	Further to this, the statement in the Draft BAR (Page 54) that "the development will aim to create a more environmentally sustainable alternative to in-ground burial" may be true, but would be subject to various religious and cultural constraints. While cremation may be a more environmentally sustainable option, certain religious and cultural beliefs (as well as individual preference) will be the main driver behind continued inground burial. This may be especially pertinent in the geographic area of the project, considering the large population of Muslim and				



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Christian inhabitants of the City of Cape Town, whose religious beliefs strongly oppose (in the case of Muslims) and veer away from (in the case of Christians) cremation. The availability of a new crematorium will not necessarily result in more cremations just because a new facility is made available.				
206.	The Draft BAR (Page 54 and 84) states that "the proposed project is aligned with the above objectives" when referring to the list of specific economic objectives in the national, provincial, district and local municipal planning documents. The objective relating to 'trade and investment' has nothing to do with the proposed development and other objectives (e.g. job creation, economic growth, develop human capital etc.) are not going to be significantly improved by the limited permanent employment opportunities associated with the proposed project. The statement made in the Draft BAR is thus not a true reflection of the facts.				Thank you for the comment, it is noted. Please refer to Section 2.3.4.2. of the Comments and Responses Report.
207.	The need and desirability section of the Draft BAR (page 55) then goes on to state that "NEMA makes it evident that proposed developments must ensure that the environment and its resources must serve the public interest while protecting the ecological environment". Considering the potentially limited				Thank you for the comment, it is noted. Please refer to Section 2.3.4.1. of the Comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	benefit of a new crematorium, together with its potential atmospheric and health impacts, the proposed development does not necessarily meet this NEMA requirement. In terms of surrounding commercial operations and the perception associated with a crematorium facility, it subjective to assume that the development would serve the public interest and, in fact, the development may be considered in contravention of the public interest. Table 7 of the Draft BAR (Page 55 – 64) serves the purposes of detailing how the proposed development is supposed to align with the principles contained in Section 2 of NEMA. Section (4) (a) (viii) requires “that negative impacts on the environment and on people’s environmental rights be anticipated and prevented”, while Section 4 (h) states that “community wellbeing and empowerment must be promoted.” It is believed that the proposed development does not align with the environmental rights or the wellbeing of the neighbouring commercial properties and will have several negative impacts on sense of place, consumer perception and subsequent loss of income leading to job losses for nearby businesses. Furthermore, the monitoring requirements in terms of mitigation of environmental impacts is not prescribed in the				Thank you for your comment, please note C

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	recommendations of the Draft BAR. These issues are believed to be a major flaw of the proposed development.				
208.	Section J of the Draft BAR (Page 155) summarises the socio-economic impacts of the proposed development and indicates the following under positive impacts – “meeting a demand for a service that is desired within the City of Cape Town” and “making CoCT a more desirable location to settle down, as this would boost service availability in the industry”. Both of these statements are grossly subjective and not based on any form of data and can therefore not be utilised in support of the proposed development.				
209.	It is clear from the Draft BAR that the proposed development will require a number of additional permits, authorisations and other confirmations from various departments before it is permitted to proceed. For example, building regulations would need to be complied with as the existing building appears to have several defects in its current state and the proposed chimneys would need to be aligned with any municipal building height restrictions.				Thank you for the comment, it is noted. Recommendations for obtaining all relevant permits/license is included as recommendation of the EA. Please refer to Section 2.3.3.5. of the Comments and Responses Report.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
210.	Occupancy certificates would be required and the relevant investigations into occupational health and safety would need to be undertaken. Page 52 and 53 of the Draft BAR requires that the local authority confirms sufficient, spare, unallocated service capacity for the development. This confirmation has not been provided.				
211.	As required in the list of appendixes detailed on page 15 of the Draft BAR, comments from WCG DHS and DoH are imperative to understand if there are any concerns regarding the development in terms of municipal requirements.				Thank you for the comment, it is noted. Please refer to Section 2.3.5.1. of the Comments and Responses Report.
212.	Similarly, comment from the DEA&DP Pollution Management and Air Quality sectors would be critical.				Please refer to Appendix E.
213.	The exemption notice required in terms of the National Health Act regulations should be included as part of Appendix E18.				
214.	Further to this, the Draft BAR also states the requirement of additional studies to be undertaken (e.g. a risk management and prevention plan in terms of the on-site storage of hazardous substances).				Thank you for the comment, it is noted. Please refer to Section 2.3.3.6. of the Comments and Responses Report.
215.	Regarding Appendix B1 (as required in the list of appendixes detailed on page 15 of the Draft BAR), it is stated that this “will				

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	be finalized if authorized", but this detail is believed to be critical in the understanding of the cremation operation and associated impacts.				
216.	Similarly, the omission of the Appendix B2 map is in contravention of the requirements of the EIA Regulations pertaining to minimum information required in the Basic Assessment report.				Thank you for the comment, it is noted. Appendix B2 is in relation to the environmental sensitivities being mapped. No sensitivity information could be overlayed. If an Appendix is not available, or applicable to a project, it does not need to be provided. The EAP has included the modelling data, from the air quality report, in the BAR and Comments and Responses Report for your perusal.
217.	Submissions of various applications and reports to various departments is required and it is key that all the relevant information submitted is made available for public review and input as the approval of the development would be subject to				Thank you for the comment, it is noted. Submission of other applications for licenses and permits applicable, will have to comply with the relevant

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	the correct information being submitted to the relevant authorities.				processes, this is not a requirement of the EIA Regulations.
218.	<p>(I) <b><u>Watercourse and Flood-line Considerations</u></b></p> <p>One of the limitations of the aquatic compliance statement is that “no access to the study area could be obtained” (Page 162 of the Draft BAR), which is believed to be a significant shortcoming in the aquatic compliance statement. While the aquatic compliance statement declares that “the proposed refurbishment activities are unlikely to impact upon any watercourse services or functions”, it also states that “in the absence of a determined 1 in 100 year flood line or riparian area the area within 100 m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench”. The lack of flood-line delineation for this particular development is believed to be a major flaw as a flood during the construction and/or operation of the proposed development could result in significant environmental damage and pollution of downstream water resources including the Diep River Estuary.</p>				<p>Thank you for your comment, as per Appendix E3 and E2 of the BAR, DWS and CapeNature have not highlighted issues with the Specialists report and assessment. A flood-line analysis is not required.</p>



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
219.	<p>(m) <b><u>Consideration of Alternatives</u></b></p> <p>Section H of the Draft BAR details the various alternatives considered in the environmental assessment process. The report outlines property and site alternatives considered, and includes a second site alternative located in Blackheath Business Park. No reason is provided for the inclusion of this specific site in Blackheath Business Park as the alternative site, especially considering the lack of landowner consent to allow the establishment of a crematorium, which automatically excludes it from consideration as an alternative in the first place.</p>				Thank you for the comment, it is noted. Please refer to Section 2.3.3.4. of the Comments and Responses Report.
220.	<p>The other alternative considered within the assessment process was a technology alternative in terms of the supply of fuel for the crematorium (coal vs LPG vs natural gas vs diesel). No alternatives in terms of the proposed crematorium technology to be utilised was investigated, and no reason was supplied for lack of consideration of alternatives in this regard, which would be considered one of the most critical alternatives to be investigated and motivated as it is the component which (supposedly) has the greatest potential for impact on the surrounding environment and community.</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
221.	Lastly a potential operational alternative was proposed in the form of a cemetery and other manufacturing uses. It is clear that a cemetery on this particular site would not be a reasonable or feasible alternative to consider, and it is uncertain why this was even put forward as an alternative. The consideration of other manufacturing uses on the site is also briefly looked into, but dismissed as the "new landowner has provided consent for the proponents intended purpose and this is in line with the zoning of the site". This is essentially saying that the proponent has no intention of considering alternative uses on site, and as such the proposed operational alternatives put forward provide little value.				
222.	The consideration of reasonable and feasible alternatives is a requirement of the EIA process. It is evident from the above that alternatives put forward have been done simply to satisfy the requirement for consideration of alternatives as part of the process, and has provided little value in ensuring all potential development options are properly investigated and assessed. Most critical is the lack of comparative cremation technologies in the investigation of alternatives, as this prevents a comparative assessment of the proposed technology with				

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	available and utilised technologies in terms of impact and benefits. This is considered a critical shortcoming of the assessment.				
223.	<p>(n) <b>Impact Assessment in the Draft BAR</b></p> <p>The impact assessment included in Section G, Section I and Section J of the Draft BAR is believed to have several shortcomings in terms of the following aspects:</p> <p>i. Incorrect interpretation of the No-Go alternative and associated impacts rating outcomes;</p>				<p>Thank you for the comment, it is noted. The interpretation is not incorrect, the Guideline on Alternatives, EIA Guideline and Information Document Series (March 2013), states that the "No-Go option: The "no-go" option is taken to be the existing rights on the property, and this includes all the duty of care and other legal responsibilities that apply to the owner of the property." The site is zoned industrial, and if not developed the status quo will persist. Compliance with NEMA Section 28 Duty of Care has been recommended, however</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
					this will not necessarily address the disrepair of the building, nor will the timeline of implementation be guaranteed as the applicant will implement the necessary changes immediately, while the landowner may not, should the no-go option remain.
224.	ii. Terminology and definitions as set out in the impact assessment methodology not utilised and inconsistently applied, e.g. probability of occurrence assigned as 'low-medium' (instead of 'possible / probably / definite'), degree to which impact may cause irreplaceable loss of resources noted as 'low' (instead of 'no loss of resource/ marginal loss of resource etc.);				Thank you for the comment, it is noted. This has been considered when updating the BAR.
225.	iii. Key impacts omitted from the detailed impact assessment and summary of findings;				Thank you for the comment, it is noted. This has been considered when updating the BAR.
226.	iv. Incorrect implementation of impact assessment methodology and/or rating of impact significance, resulting in				Thank you for the comment, it is noted. This has been considered when updating the BAR.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	an inability for others to logically assess and follow the methodology utilised and significant ratings given; and				
227.	v. Incorrect/lacking information in the Environmental Impact Statement, EAP recommendations, EA requirements.				Thank you for the comment, it is noted. This has been considered when updating the BAR.
228.	<p>Examples of the abovementioned shortcomings will be illustrated, in order of occurrence, in the sections below:</p> <ul style="list-style-type: none"> <li>Page 107 (The option of not implementing the activity (the 'No-Go' Option)):</li> </ul> <p>The description of the No-go alternatives is incorrect as, according to the Western Cape Department of Environmental Affairs &amp; Development Planning (DEA&amp;DP) EIA Guideline on Alternatives (2013), the 'No-go' option is taken to be the existing rights on the property and this includes all the duty of care and other legal responsibilities that apply to the owner of the property. Should the proposed crematorium not be implemented, the 'No-go' alternative must assume that the site will be operated in accordance with the existing property rights, duty of care and legal responsibilities that are applicable. The</p>				Thank you for the comment, it is noted. See response as per point 223.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	EAP's statement that "existing disturbance to the site will persist, and the facility would remain in a disturbed condition" is thus incorrect and should not be considered when rating impacts associated with the 'No-go' alternative. For example, the rating of 'medium (-)' assigned to the No-Go Alternative in terms of the 'Alien Invasive Species Clearance and Rehabilitation' impact (page 134-135) is not correct as per the guidelines as to how 'No-go' impacts should be assessed.				
229.	<ul style="list-style-type: none"> <li>Page 108 – 109 (Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives):</li> </ul> <p>The significance of impacts should ideally be determined based on the 'effect versus likelihood' principle and a ratings system should be assigned to the various criteria such as extent, duration, probability and severity. The methodology implemented by the EAP does not provide for a quantitative assessment of the significance of environmental impacts and is extremely subjective. In general, a succinct impact assessment methodology is not followed as there is no quantifiable impacts (i.e. how does the EAP determine that the overall significance is</p>				Thank you for the comment, it is noted. This has been considered when updating the BAR.



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	low, medium or high without a rating scale associated with the various criteria). There is also no quantitative detail on how the impact significance is determined after mitigation. Further to this, the EAP has rated the probability of numerous impacts as 'low', while the methodology prescribes for these to be rated as 'improbable', 'probable', 'highly probable' or 'definite'.				
230.	<ul style="list-style-type: none"> <li>Page 112 – 118 (Waste Management Impacts)</li> </ul> <p>The magnitude of the impact is not provided and the impact is rated as long-term despite referring to construction-related activity. The probability of occurrence is rated as 'low-medium' (which is not in line with the terminology utilised in the methodology), but waste will definitely be generated during construction. It is unclear how the no-go alternative would have a higher impact rating both before and after mitigation in comparison with the proposed development.</p>				
231.	<ul style="list-style-type: none"> <li>Page 123 – 124 (Socio-Economic Impacts – Creation of Multiple Job Opportunities &amp; Capital Expenditure):</li> </ul> <p>No magnitude of the impact is provided. The significance rating of this impact is assigned as 'High (+)', which seems excessive</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	considering the small number of jobs associated with a short-term construction period. The assessment of the no-go alternative also does not consider the persons employed by the chemical facility currently operating from the property who would continue to be employed if the facility continues to operate as it does, and as such the 'Low (+)' rating provided for the no-go alternative seems unduly low.				
232.	<ul style="list-style-type: none"> <li>Page 127 – 128 (Security and Vandalism)</li> </ul> <p>No magnitude of the impact is provided. No indirect or cumulative impacts are provided. The probability of occurrence is noted as 'highly unlikely', which is not agreed with as, without the implementation of mitigation measures, it is at least 'probable' or 'highly probable' that security and vandalism impacts will occur as a result of the development.</p>				
233.	<ul style="list-style-type: none"> <li>Page 128 – 130 (Air Quality – Health and Odour Impacts):</li> </ul> <p>The magnitude of the impact is not provided. The 'consequence of impact or risk' does not refer to the potential health problems associated with emissions into the atmosphere. The 'probability'</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	of the impact should be 'highly probable' as opposed to 'low' and the 'degree to which the impact may cause irreplaceable loss of resources' should be 'high' as, prior to implementation of mitigation, air quality impacts would render the development proposal unacceptable. The overall rating of this impact, stated as "low" is believed to be incorrect and should be revised according to a quantitative impact assessment methodology. 'Cumulative impact prior to mitigation' does not provide a rating, but instead (incorrectly) lists impacts. 'Cumulative impacts post mitigation' are noted to be 'none', but there is not sufficient data available in the assessment to support this statement.				
234.	<ul style="list-style-type: none"> <li>Page 130 – 133 (Safety due to Storage and Use of Hazardous Material: LPG Tanks):</li> </ul> <p>The magnitude of the impact is not provided. The volume of LPG gas storage (80m3) should also be mentioned here as this is a significantly large volume and is potentially subject to an MHI risk assessment. The 'consequence of impact or risk' does not refer to the potential injury, death and the risk to neighbouring properties and surrounding areas. The 'probability' of the impact</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	should be 'probable' as opposed to 'low' without any mitigation measures implemented and the 'degree to which the impact may cause irreplaceable loss of resources' should be 'high' or 'very high' based on the potential safety risks. The overall rating of this impact, stated as "low" is believed to be incorrect and should be revised according to a quantitative impact assessment methodology. No indirect impacts are listed, there is no rating provided for 'cumulative impacts prior to mitigation' and 'cumulative impacts post mitigation' are listed as 'none'. Residual impacts are listed as 'none' and this is not based on any apparent data or information provided in the project reports.				
235.	<ul style="list-style-type: none"> <li>Page 133 – 134 (Social Impact: Property Value Impacts):</li> </ul> <p>The magnitude of the impact is not provided. The potential impact and risk statement provided for Alternative Layout 1 is very generalised with no scientific or research background. A proper socioeconomic study should have been undertaken to determine the perceived influence of a crematorium on surrounding business and subsequent impact on property values. The 'consequence of impact or risk' should include issues such as 'loss of customers to commercial businesses and</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	subsequent loss of revenue with potential for job losses'. The 'degree to which the impact may cause irreplaceable loss of resources' should therefore be 'medium-high' or 'high' and the 'degree to which the impact can be reversed' should be 'barely reversible' as changing the perceptions associated with a crematorium is not easily reversible. Similarly, the degree to which the impact can be avoided, managed and mitigated should be rated as 'low'. The significance rating of this impact post-mitigation should therefore not change as this impact is very difficult to mitigate. The overall rating of this impact, stated as "very-low" is believed to be incorrect and should be revised according to a quantitative impact assessment methodology.				
236.	<ul style="list-style-type: none"> <li>Page 134 – 135 (Alien Invasive Species Clearance and Rehabilitation):</li> </ul> <p>No magnitude or duration of the impact has been provided. No cumulative impact prior to mitigation has been provided. There are different ratings given for 'degree to which impact can be reversed' for Alternative 1 and the No-go alternative (as well as significance ratings before and after mitigation) but there is no reason to believe there would be any difference. Cumulative</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	impact post mitigation noted as 'low' despite no cumulative impacts prior to mitigation being listed. It is believed that the shortcomings with this impact assessment are also highlighted by the fact that the alien vegetation impact is rated as a higher impact than the air quality or health impacts.				
237.	<ul style="list-style-type: none"> <li>Page 137 – 140 (Health Impacts – Workers within the Crematorium Facility):</li> </ul> <p>The heading of this impact suggests that there is only a consideration for health impacts on workers at the facility and not on any outside receptors. The description of the potential impact and risk provides important information for considering the overall feasibility of the development and should be key considerations not just for staff at the crematorium, but also for surrounding areas. The 'consequence of impact or risk' states "short term health of workers compromised", but negative health impacts will continue in the long-term for the duration of the facility operations. Furthermore, any significant health issues could result in 'long-term' or 'permanent' impacts to those who are affected. The 'probability' of the impact should be 'highly probable' as opposed to 'low' prior to mitigation and the</p>				



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>'degree to which the impact may cause irreplaceable loss of resources' should be 'high' or 'very high' as, prior to implementation of mitigation, this impact is critical to human health of the workers. Various indirect impacts are associated with this impact, such as the financial burden of required healthcare, inability to work and earn income, loss of quality of life etc. However, none are listed here and no rating is provided for the cumulative impact prior to mitigation. The overall rating of this impact, stated as "low-medium" is believed to be incorrect and should be revised according to a quantitative impact assessment methodology. The post-mitigation criteria of the impact would still be long-term (duration), probable (likelihood) and medium or high (degree of irreplaceable loss) and therefore is likely to be more significant than the current rating of 'low'. No residual impact is provided and the cumulative impact post mitigation is noted as 'low' despite no cumulative impact rating provided prior to mitigation.</p>				
238.	<ul style="list-style-type: none"> <li>Page 140 – 141 (Socio-Economic Impacts: Job Creation and Local Revenue):</li> </ul>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	The 'degree to which the impact can be reversed' should be 'easily reversible' as jobs could be lost at any given time for various reasons. The overall rating of this impact, stated as "medium (+)" is believed to be excessively high considering the limited number of jobs associated with the development. This should be revised according to a quantitative impact assessment methodology. No cumulative impact rating is provided and no indirect impacts are listed. The economic benefit of the current chemical facility remaining operational on site has not been considered and no assessment of the impact associated with the No-go alternative has been included. The continued job security and income generation from the status quo would have a positive impact on the community.				
239.	<ul style="list-style-type: none"> <li>Page 141 – 143 (Socio-Economic Impacts: Provision of Crematorium Services to Surrounding Communities):</li> </ul> <p>The extent, duration and magnitude of the impact for Alternative 1 is simply noted as "positive". The 'probability' of the impact should not necessarily 'definite' as this crematorium will not singlehandedly meet the demand for services in CoCT. The 'degree to which the impact can be reversed' should be 'easily</p>				

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

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	reversible' as the operation could cease at any given time. The overall rating of this impact, stated as "high (+)" is believed to be excessively high based on the 'low' rating assigned to the 'degree to which the impact may cause irreplaceable loss of resources'. No indirect impacts are noted and there are no cumulative impacts pre- or post-mitigation specified.				
240.	<ul style="list-style-type: none"> <li>Page 143 – 145 (Social Impact: Visual (Sense of Place)):</li> </ul> <p>The magnitude of the impact is not provided. The 'extent' of the impact is potentially 'regional' as the perception associated with the crematorium could result in regional consumers avoiding commercial properties in this area in favour of other areas. The indirect impacts should also include issues such as 'loss of customers to commercial businesses and subsequent loss of revenue with potential for job losses'. The degree to which the impact can be avoided, managed and mitigated should be rated as 'low' and the overall rating of the impact post-mitigation should be revised according to a quantitative impact assessment methodology. No cumulative impact rating pre mitigation is provided and cumulative impact post mitigation</p>				

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	and residual impact is noted as 'none', with nothing to substantiate this rating.				
241.	<ul style="list-style-type: none"> <li>Page 146 – 147 (Traffic Impact):</li> </ul> <p>The magnitude of the impact is not provided. Please refer to Section (i) of our letter above. According to the impact statement "traffic along Stella Road will not be significantly impacted during operational phase" although there is a possibility of up to 144 trips to and from the facility on a daily basis (excluding staff, delivery vehicles etc). The overall rating of the impact should be revised according to a quantitative impact assessment methodology with input from a suitably qualified TIA specialist. The current assessment is not based on any relevant data or objective information. No indirect impacts are listed and no cumulative impacts prior to mitigation are listed. Cumulative impacts post mitigation is noted as 'none' (with no explanation as to how there will be no impact on traffic).</p>				
242.	<ul style="list-style-type: none"> <li>Page 148 (Atmospheric Impact Assessment):</li> </ul> <p>A summary of the findings of the specialist assessment is provided, but under the 'Summary of Impacts' and 'Summary of</p>				Thank you for the comment, it is noted. This has been considered when updating the BAR.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Management Measures' it is stated as "none" for both. Even if the Atmospheric Impact Assessment does not provide for the assessment or management of air quality impacts (the shortcomings of this report are details in Section n below), the EAP should query this with the specialist as the type of development, which is subject to the approval of an AEL, would definitely have atmospheric impacts that need to be managed. The omission of this from the summary of the impacts is believed to be a fatal flaw with the impact assessment.				
243.	<ul style="list-style-type: none"> <li>Page 148 – 149 (Aquatic Compliance Statement):</li> </ul> <p>Similar to the above, nothing is listed under the 'summary of impacts', which is believed to be incorrect based on the fact that the below sections contain numerous management measures and recommendations that could only relate to potential impacts on aquatic resources. The omission of this from the summary of the impacts is believed to be a fatal flaw with the impact assessment.</p>				<p>Thank you for your comment, it is noted. As per Appendix G2, page 10, states that: "the impacts on the freshwater receiving environment due to the proposed refurbishment activities are unlikely to impact upon any watercourse services or functions."</p> <p>All recommended control measures have been integrated</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
					into the BAR and EMPr mitigation tables.
244.	<ul style="list-style-type: none"> <li>Page 149 – 151 (Draft Rapid Appraisal Health Impact Assessment):</li> </ul> <p>The 'summary of findings' appears to be a copy paste error from the above section. The 'summary of impacts' does not detail areas outside the crematorium. The impact summary provides important information for considering the overall feasibility of the development and should be a key consideration not just for staff at the crematorium, but also for surrounding areas.</p>				Thank you for your comment, it is noted. The HIA has been updated and integrated into the BAR.
245.	<ul style="list-style-type: none"> <li>Page 151 – 152 (Management Measures):</li> </ul> <p>This section is crucial to the correct mitigation of impacts and management of the crematorium to ensure limited impacts on the surrounding environment. However, the section does not speak to any air quality of socio-economic considerations associated with the proposed development. The omission of this detail is believed to be a fatal flaw with the impact assessment.</p>				Thank you for the comment, it is noted. This has been considered when updating the BAR. See Section 2.3.1 and 2.3.2. in the Comments and Responses Report.



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
246.	<ul style="list-style-type: none"> <li>Page 155 – 157 (Environmental Impact Statement):</li> </ul> <p>The statement provided at the start of this section (...the proposed development, has significant positive impacts and minimal negative impacts...) is subjective and based on the incorrect use of an unsuitable impact assessment methodology (as described above). The positive impacts associated with the proposed development should not have a significantly high rating. The negative impacts are not believed to be minimal and would only avoid a rating of High (-) if mitigated effectively. Mitigation measures provided for the negative impacts is subjective and unless the facility is monitored and managed by external Environmental Control Officer (ECO) and Health &amp; Safety agent, then there will be no accountability to ensure that significant negative impacts are mitigated correctly. The EAP has listed "making CoCT a more desirable location to settle down" under the positive impacts an associated with the 'socio-economic' aspect. This has no substantiation in this context as the provision of a crematorium is not something that people generally consider when deciding where to settle down and is in fact more of a negative consideration. Also included in this list</p>				<p>Thank you for your comment, it is noted.</p> <p>Monitoring has been recommended in the BAR, however an appropriate air quality specialist will need to monitor the air emissions.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	is the statement that "health risks are significantly low considering the technology and eco-friendly fuel source". This is perhaps a positive in comparison with other technology, but this is a negative in comparison to the 'No-go' alternative. "Temporary, such as noise, odour and visual impacts from renovation activities" is the only item listed under negative socio-economic impacts. The proposed development could in fact result in long-term negative socio-economic impacts including the social perception, adverse mental and emotional well-being, its influence on consumers, the subsequent loss of revenue to neighbouring businesses and associated loss of jobs.				Mitigation measures have been recommended to address these issues and ensure that they are minimized. See the BAR and the Section 2.3 of the Comments and Responses Report.
247.	The EAP has stated that there will be "no direct impacts on a natural environment" and that "according to specialist input air quality will not be compromised." This contradicts earlier statements referring to NO2 (nitrogen dioxide) concentrations exceeding the hourly NAAQS standards as well as the EAP's statement directly below that there is "potential for air emissions				Thank you for your comment, it is noted. Air Quality Exceedances have been assessed in the Impact Tables of the BAR.

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	if neglected." This suggests that the air quality could be compromised and therefore there are direct impacts on the natural environment (which includes air quality). Further to this, there is no mention of health impacts anywhere in this section of the Environmental Impact Statement, which is a significant shortcoming of the EIA.				
248.	The summary of positive and negative impacts/risk (Table 11) is based on the incorrect use of an unsuitable impact assessment methodology (as described above) resulting in a skewed overall impact assessment.				Thank you for your comment, it is noted. The Assessment Methodology is detailed in Section H, point 3. The assessment criteria utilized in this environmental impact assessment is based on, and adapted from, the Guideline on Impact Significance, Integrated Environmental Management Information Series 5 (Department of Environmental Affairs and Tourism (DEAT), 2002) and the Guideline 5: Assessment of Alternatives and Impacts in

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
					Support of the Environmental Impact Assessment Regulations (DEAT, 2006).
249.	<ul style="list-style-type: none"> <li>Page 159 (Recommendation of the Environmental Assessment Practitioner ("EAP") - aspects that were conditional to the findings of the assessment):</li> </ul> <p>There are a number of aspects that were conditional to the findings of the air quality and health assessment that should be listed in this section. The ECO, as recommended by the EAP, would need to be a suitably qualified external ECO with relevant air quality and associated health &amp; safety experience. The exemption required in terms of the National Health Act regulations would likely be subject to various conditions, which should also form part of the EA conditions and guide the competent authority's decision-making process.</p>				Thank you for your comment, it is noted. Please refer to the EMPr for monitoring timeframes, for the ECO and Auditor. All other monitoring, ie. health, and air emissions, are in line with other permits/license that have been recommended in the BAR, that will advise on the relevant timeframes.
250.	<ul style="list-style-type: none"> <li>Page 160 (Recommendation of the Environmental Assessment Practitioner ("EAP") - reasoned opinion as to whether the proposed activity or development should or should not be authorised):</li> </ul>				Thank you for your comment, it is noted.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	The statement that the “air quality will not be compromised as a result of the operation of this crematorium with the intended cremators” is subject to various mitigation measures and operational constraints. As above, this statement also contradicts earlier statements referring to NO <sub>2</sub> concentrations exceeding the hourly NAAQS standards. As mentioned earlier in this review, the use of the term “reduce” when referring to potential health impacts must not be construed as negating the potential for health impacts not only for workers on site, but also the surrounding areas. The statement that “environmental impacts, other than air quality, were not applicable based on the transformation of the site” is not a true reflection of the impact assessment outlined in Section G of the Draft BAR. It is stated that “the applicant is willing to shoulder the economic burden that will arise from such a development, and pursue all legal requirements to implement a legitimate organization”, but there is no mention of the potential economic burden on other commercial properties in the area as a result of the proposed development. The social impacts listed in this section do not include any of the potentially negative impacts detailed elsewhere in the report.				The cumulative emissions without the implementation of the crematorium do exist. Air emissions are not just created by the crematorium. The opinion to approve the development, is based on the implementation of the EMP <sub>r</sub> and EA conditions, in addressing the impacts that may occur.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

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	For these reasons stated above, it is believed that the 'reasoned opinion as to whether the proposed activity or development should or should not be authorised', as provided by the EAP, is not a true reflection of the proposed development and its potentially negative environmental and social impacts.				
251.	<ul style="list-style-type: none"> <li>Page 162 (Recommendation of the Environmental Assessment Practitioner ("EAP") - a description of any assumptions, uncertainties and gaps in knowledge):</li> </ul> <p>The EAP refers to a "Baseline HIA" and a "Final HIA" for the first and only time in the entire Draft BAR. It is unclear which of these reports is the one included as an appendix to the Draft BAR or how these two documents may differ. All information should be made available for public review and therefore any omission of reports pertaining to the HIA would be a major flaw in the impact assessment process for the proposed development.</p>				Thank you for your comment, it is noted. The Final HIA would be utilized in the final submission.
252.	<ul style="list-style-type: none"> <li>Page 163 (Recommendation of the Environmental Assessment Practitioner ("EAP") - the period for which the EA is required, the date the activity will be concluded</li> </ul>				Thank you for your comment, it is noted. Please refer to the EMPr for monitoring timeframes, for the ECO and Auditor. All other



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	<p>and when the post construction monitoring requirements should be finalised):</p> <p>The time periods presented by the EAP are unclear. It is believed that the monitoring requirements for this particular development should be finalised prior to approval in order to ensure that the applicant is aware of what would be required should they granted approval for the development. Furthermore, if the EA lapses after 10 years, this may have implications for continued compliance and monitoring in terms of a legally authorised crematorium operation.</p> <p>Based on the numerous shortcomings of the impact assessment sections listed above, it is believed that the overall assessment of the proposed development is fatally flawed and should not be granted an EA based on the information presented by the EAP.</p>				<p>monitoring, ie. health, and air emissions, are in line with other permits/license that have been recommended in the BAR, that will advise on the relevant timeframes.</p>
253.	<p><u>Air Quality Specialist Assessment</u></p> <p>Similar to the abovementioned impact assessment in the Draft BAR, the Atmospheric Impact Assessment is believed to have several shortcomings in terms of the following aspects:</p>				<p>Thank you for your comment, it has been noted. Please see page 47 of the AIR: "No results inside the plant were assessed, as these are subject to</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

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	<p>i. The assessment does not consider air quality impacts for staff working at the facility;</p> <p>ii. There is no mention or assessment of potential odour impacts;</p> <p>iii. There is no implementation of any methodology regarding the assessment of air quality impacts; and</p> <p>iv. There are no recommendations regarding potential mitigation or specific monitoring requirements.</p> <ul style="list-style-type: none"> <li>Examples of the abovementioned shortcomings will be illustrated, in order of occurrence, in the sections below:</li> </ul>				<p>occupational air quality standards and not the NAAQS."</p> <p>Odour from a facility like a crematorium cannot be assessed using an AIR.</p> <p>Air emissions from the facility will need to be monitored annually as per GN 893 of 2013.</p>
254.	<ul style="list-style-type: none"> <li>Page 4 – 5 (Executive Summary):</li> </ul> <p>The report states that "no NAAQS exceedances are predicted in any of the surrounding residential areas", but does not mention surrounding commercial areas, which generally have a higher populous during the day than residential areas. Exceedances in air quality in proximity to commercial areas is a viable concern and if this is not addressed by the specialist, it is believed to be a significant shortcoming of the assessment.</p>				<p>Thank you for your comment, it has been noted. Please see page 45: "The plant boundary essentially acts as a set of receptors for the surrounding businesses and members of the public who do not work at the crematorium.", of the Air Quality report.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
255.	<ul style="list-style-type: none"> <li>Page 7 (Enterprise Details):</li> </ul> <p>It is noted that there is no company registration number provided in this report and instead it is stated "Registration in Progress." It is believed that a valid company registration number would be required in order for an EA and/or AEL to be issued to the applicant.</p>				Thank you for your comment, it has been noted.
256.	<ul style="list-style-type: none"> <li>Page 8 (Description of Surrounding Land Use (Within a 5 km Radius)):</li> </ul> <p>It is noted that a number of various land uses occur within a 5km radius of the site and the list provided in this section of the report is limited. It is believed that if a 5km radius must be considered for this type of development, the location of a crematorium in a significantly built-up area would be questionable. Furthermore, it is stated that "the Milnerton residential area is located 300 metres to the E of the site", which is significant in terms of the National Health Act regulations pertaining to crematoria.</p>				Thank you for your comment, it has been noted.
257.	<ul style="list-style-type: none"> <li>Page 10 (Process Description):</li> </ul>				Thank you for your comment, it has been noted. Negligible fugitive emissions are

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	The process description does not include any detail regarding the storage and use of LPG, which must be addressed as part of the air quality study. This is believed to be a major shortcoming of the specialist assessment.				anticipated from the storage of LPG
258.	<ul style="list-style-type: none"> <li>Page 12 (Point Source Parameters):</li> </ul> <p>It is noted that a number of the values used in the calculations are marked as "provided", but it is unclear as to where the values were sourced or whether they are legitimate values. If the 'provided' values were to change, this would alter the data and subsequently alter the outcome of the specialist assessment.</p>				
259.	<ul style="list-style-type: none"> <li>Page 13 (Point Source Maximum Emissions Rates (Start-up, Shut-down, Upset and Maintenance conditions)):</li> </ul> <p>It is stated that "no significant variation in the emissions profile is anticipated with start-up, shut-down, upset and maintenance conditions", but it is unclear how this statement is derived. It could be a case that this is simply informal input provided by the applicant, in which case the statement is subjective and not necessary an independent reflection on the facts.</p>				Thank you for your comment, it has been noted. Provided by the equipment manufacturers.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
260.	<ul style="list-style-type: none"> <li>Page 14 (Emergency Incidents):</li> </ul> <p>It is stated that this section is "not applicable", but it is believed that emergency incidents should definitely be considered with regards to the storage and utilisation of LPG for the facility. This is believed to be a major shortcoming of the specialist assessment.</p>				Thank you for your comment, it has been noted. As per the Regulations Prescribing the Format of an Atmospheric Impact Report (GN 747 of 2013), the emergency incidents section must contain a summary of emergency incidents in the last 2 years. Considering the facility is, at this stage, only proposed, this section is not applicable.
261.	<ul style="list-style-type: none"> <li>Page 21 (Emissions Characteristics):</li> </ul> <p>It is stated that "no fugitive emissions are anticipated from the LPG tanks", but it is unclear how this statement is derived. It could be a case that this is simply informal input provided by the applicant, in which case the statement is subjective and not necessary an independent reflection on the facts.</p>				Thank you for your comment, it has been noted. Please see US EPA Emissions Factor Documentation for AP-42 Section 1.5 Liquefied Petroleum Gas Combustion, page 2-6: "with adequately maintained LPG equipment, fugitive emissions are primarily confined to tank loading transfer

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					operations" of the Air Quality Report (Appendix G3 of the BAR)
262.	<ul style="list-style-type: none"> <li>Page 22 – 23 (Emissions Inventory and Source Parameters):</li> </ul> <p>It is stated that "a gas flow rate of 3 500 m<sup>3</sup>/h was provided by the applicant, along with an approximate stack temperature of 600 °C", but it is unclear as to where the applicant sourced these values or whether they are legitimate values. If the 'provided' values were to change, this would alter the data and subsequently alter the outcome of the specialist assessment.</p> <p>Furthermore, with regards to Table 5, it is stated that "as required by the Code of Practice, the emission rates calculated using the MESs were used in this study." It appears that, in most cases in Table 5, the MESs are higher of the two emissions factors. It is believed that it would be best practice to consider the more stringent of the two factors for the purposes of an environmental air quality assessment. This may result in changes to the data and subsequent changes to the outcome of the assessment.</p>				Thank you for your comment, it has been noted. Provided by equipment manufacturer. The MESs were used as the basis for the investigation.



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
263.	<ul style="list-style-type: none"> <li>Page 27 (Background Concentrations):</li> </ul> <p>It is noted from Table 7 that the nearest ambient air quality monitoring station is 2 km from the site and only measures the NO2 parameter. These stations are a significant distance from the proposed site and would likely contain significantly different land uses. It is therefore questionable whether data from these stations would have any relevance to the proposed development. Further to the above, several of the graphs contained in the report do not appear to show any relevant data and are generally difficult to interpret (e.g. Figure 13, 14, 16, 18, 19, 23 and 25).</p>				Thank you for your comment, it has been noted. As requested by the City of Cape Town, additional ambient monitoring data has been used in v3 of the AIR.
264.	<ul style="list-style-type: none"> <li>Page 41 (Results):</li> </ul> <p>Several sections of the report make reference to the term “at the fence line of the site”, suggesting that only impacts outside of the site would be relevant. This section of the report states that “no results inside the plant were assessed, as these are subject to occupational air quality standards.” This is a significant limitation to the study and would make it difficult for the EAP to correctly rate impacts regarding worker health and safety. It is</p>				Thank you for your comment, it has been noted. Occupational health standards were not assessed in the AIR. Please see Comments and Responses Report, Section 2.3.1.2.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	believed that the adherence to occupational air quality standards should be a primary consideration in determining whether the proposed development is granted an EA and/or AEL and the omission thereof is believed to be a fatal flaw in the assessment process for the proposed development.				
265.	<ul style="list-style-type: none"> <li>Page 60 (Current or Planned Air Quality Management Interventions) and (Compliance and Enforcement History):</li> </ul> <p>These sections of the study are marked as "not applicable", which is believed to be a major shortcoming of the specialist study. The omission of any air quality management interventions would suggest that there no possibility of mitigating the negative air quality impacts associated with the proposed development. In addition, there is no suggested monitoring protocol provided and no indication as to the requirements for inclusion in the EMPr. An AEL should not be issued for the development without the inclusion of monitoring requirements, which needs to be informed by this section of the specialist study. With regards to compliance and enforcement history, this may be applicable to</p>				<p>Thank you for your comment, it is noted. As per GN 893 of 2013, the facility will be required to undergo annual emissions sampling. As per GN 747 of 2013, the current or planned air quality management interventions section must contain an overview of any approved air quality management improvement interventions currently being implemented and those scheduled for the next five years. Thus, this section is not</p>

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	previous activities undertaken at the site and, at minimum, a statement in this regard should be provided.				applicable to the proposed facility.  The facility is not yet operational, and thus has no air quality compliance or enforcement history.
266.	The requirement to assess and address cumulative air quality impacts within the industrial area from the proposed crematorium has not been included in the Air Quality Specialist Assessment. It is noted that at no point in the entire Air Quality Specialist Assessment is the term "odour" mentioned and there is no information or assessment regarding potential odours associated with the proposed development. In that regard, the EAP has taken it upon themselves to include an impact relating to odours in their assessment (page 128 – 129 of the Draft BAR), which clearly is not informed by this specialist study. This is believed to be a fatal flaw in the impact assessment process for the proposed development.				Thank you for your comment, it is noted. Odour was not assessed as part of the AIR. Please see Comments and Responses Report, Section 2.3.1.3
267.	Lastly, the Screening tool requires 'Ambient Air Quality Impact Assessment' as well as 'Air Quality Impact Assessment'. It is not				Thank you for your comment, it is noted. Please see Appendix B

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	mentioned anywhere in the Draft BAR whether or not these requirements are the same and, if there are different requirements, whether they have all been addressed by the Air Quality Specialist Assessment.				and Appendix C that detail these requirements, as per Appendix G3 of the BAR (Air Quality Report).
268.	<p><u>Health Impact Assessment</u></p> <p>Similar to the above, the Health Impact Assessment (HIA) is believed to have several shortcomings in terms of the following aspects:</p> <p>i. Despite noting that the HIA assesses impacts on community health, the findings of the HIA are limited to impacts on workers at the crematorium and does not mention areas (and people) outside the crematorium;</p> <p>ii. There is no implementation of any methodology regarding the assessment of health impacts;</p> <p>and</p> <p>iii. There are no recommendations regarding potential mitigation or specific monitoring requirements.</p>				<p>Thank you for your comment, it is noted.</p>

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Examples of the abovementioned shortcomings will be illustrated, in order of occurrence, in the sections below:				
269.	<ul style="list-style-type: none"> <li>Page 5-6 (Executive Summary):</li> </ul> <p>Reference at the top of Page 6 is made to "mine design" and "mine development", which is clearly not applicable to this project. There is also a heading for "Key findings and recommendations", but no text is provided thereunder.</p>				<p>Thank you for your comment. Please note that this has been addressed/ amended accordingly in the current Report that is out for public review, Appendix G3 of the BAR.</p>
270.	<ul style="list-style-type: none"> <li>Page 10 (Introduction):</li> </ul> <p>Reference is made to" both scoping and impact assessment phases", which is not applicable, as the process followed was a basic assessment.</p>				
271.	<ul style="list-style-type: none"> <li>Page 11-12 (Terms of Reference):</li> </ul> <p>At the bottom of Page 11, reference is made to the review of other specialist studies conducted as part of the EIA, with impacts identified including contamination of groundwater and project-induced in-migration, neither of which are relevant to the proposed crematorium development. The terms of</p>				

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	reference also indicates that it will include an impact assessment process rating the likelihood and consequence of health impacts to outline their significance and prioritisation for mitigation. This has not been undertaken.				
272.	<ul style="list-style-type: none"> <li>Page 21 (Health Impact Assessment Framework and Methodology):</li> </ul> <p>This section sets out the scope of HIAs and explains how they differ from health risk assessments (HRAs). The report indicates that HIAs are largely concerned with potential impacts on the health of the community (i.e. impacts “outside of the fence”) and HRAs with impacts on workers’ health (i.e. inside the fence). However, the findings of the HIA for the crematorium does not talk to community health related impacts and instead focuses on potential health impacts on crematorium workers.</p>				
273.	<ul style="list-style-type: none"> <li>Page 32 (Determining the scale of the HIA):</li> </ul> <p>This section notes that the project is relatively big and an influx of new residents is expected, and that a Comprehensive HIA was deemed necessary. This is obviously incorrect and needs to be amended.</p>				



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274.	<ul style="list-style-type: none"> <li>Page 34 (Baseline Data Collection):</li> </ul> <p>This section notes that data collection activities for the HIA included participatory data collection in the form of a questionnaire and focus group discussion, but the details of this, nor the data collected therefrom, is presented anywhere in the report.</p>				
275.	<ul style="list-style-type: none"> <li>Page 69 (Potential Human Health Impacts):</li> </ul> <p>The report notes that the relative contribution of a crematorium to local air pollution (and presumably associated health impacts) will vary depending on other potential sources of pollutants nearby as well as the quantity of cremations (amongst others). However, the report does not identify other pollutants in the area in order to assess and address this cumulative impact, and also does not note the relative change in potential impact from operations in Phase 1 versus Phase 2 (for example) with the concomitant increase in cadavers cremated per day.</p>				
276.	<ul style="list-style-type: none"> <li>Page 73 (Section 10.1.2: Air Quality and Section 10.1.2.1 Particulate Matter and 10.1.2.2 Health Impact of PM: Cancer):</li> </ul>				

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NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	Section 10.1.2 incorrectly refers to impact from dumping sites as well as a number of specialist studies not undertaken, which is not relevant to this project. Section 10.1.2.1 & 10.1.2.2 refers to PM2.5 generated from diesel engines, which is not part of the project description.				
277.	<ul style="list-style-type: none"> <li>Page 79 (Mitigation Measures):</li> </ul> <p>This section notes mitigation measures which could be implemented to reduce emissions of key pollutants. This includes restrictions on the materials and coatings used in caskets, but does not outline how this could practically be controlled on implemented.</p>				Thank you for your comment, it is noted. Please refer to responses in Section 2.3.1.3. of the comments and Responses Report.
278.	<ul style="list-style-type: none"> <li>Page 80 (Conclusion):</li> </ul> <p>This section acknowledges that exposure to dangerous chemicals released by crematoriums raises concern, but notes that no studies have been identified that demonstrate the relationship between crematoria emission and adverse health impacts. This statement is factually incorrect, as various studies</p>				Thank you for your comment. Please note that this has been addressed/ amended accordingly in the current Report that is out for public review, Appendix G3 of the BAR.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	are available online which demonstrate this relationship (as already noted above).				
279.	Furthermore, the report concludes that the proposed technology is expected to significantly reduce emission (and in turn any associated health impacts). A reduction in emission (presumably as compared to other, unspecified technology, as it is not discussed or outlined anywhere) is a statement of relativity and does not automatically mean that there is no (or an acceptable level) of impact.				Thank you for your comment. Please note Section 2.3.3.1. of the Comments and Responses Report. This deduction is based on the technology specifications and proven compliance.
280.	Further to the above sections, it is noted that the health impact assessment report includes a large amount of superfluous information in Sections 8 and 9 which does not add any value to understanding and determining community health impacts associated with the operation of the crematorium. Additionally, no consideration is given to potential health impacts associated with the handling and storage of cadavers on site and instead the report focusses solely on the activity of cremation.				Thank you for your comment. Please note that this has been addressed/ amended accordingly in the current Report that is out for public review, Appendix G3 of the BAR.
281.	The health assessment does not include any assessment of potential health impacts associated with the proposed crematorium, and also omits any conclusions and recommendations with regard to the proposed development.				Thank you for your comment. Please note that this has been addressed/ amended accordingly in the current

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	This is considered a fatal flaw and deems the specialist study of little to no value for the purposes of environmental authorisation application process.				Report that is out for public review, Appendix G3 of the BAR.
282.	<p><b><u>Additional Considerations</u></b></p> <p>Further to the above, the EIA contains the following key statements, which reflect significant fatal flaws in granting an authorisation for the proposed development, and which have not been adequately addressed and/or mitigated:</p> <ul style="list-style-type: none"> <li>• "The Specialist acknowledged that exposure to dangerous chemicals released by crematoriums raises concerns" (Page 2 of the Draft BAR);</li> </ul>				
283.	<ul style="list-style-type: none"> <li>• "Ambient hourly NO<sub>2</sub> (nitrogen dioxide) concentrations at the fence line are predicted to exceed the hourly NAAQS standard" (Page 2 of the Draft BAR);</li> </ul>				
284.	<ul style="list-style-type: none"> <li>• "NEMA makes it evident that proposed developments must ensure that the environment and its resources must serve the public interest while protecting the ecological environment" (Page 55 of the Draft BAR);</li> </ul>				Thank you for your comment, it is noted. Please refer to responses in Section 2.3.1. and 2.3.2. of the comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
285.	<ul style="list-style-type: none"> <li>"Given the purpose and function of crematoriums, the idea of such a facility being situated close to one's premises, work or home can be emotionally and psychologically overwhelming, influenced by cultural beliefs and perceptions of negative health impacts" (Page 86 of the Draft BAR);</li> </ul>				
286.	<ul style="list-style-type: none"> <li>"...a large quantity of unorganized odour emissions accumulates inside the workshop and impact the health of the workshop staff. Several studies have highlighted the potential risks of inhaling radioactive ashes by crematorium staff or members of the public. Due to the prolonged half-life of some radioisotopes, if the patient dies soon after implantation, then the cremated remains would also remain radioactive (Smith et al.,2012). This causes a hazard to the staff and those who handle the remains, until placed into a metal urn. Pacemakers and expandable orthopaedic nails are also two potential dangers to cremation staff. Studies conducted by Korczynski (1997) and Maloney et al., 1998) exposure to Hg to be higher amongst crematoria staff than in a</li> </ul>				Thank you for your comment, it is noted. Please note this is in regard to general concerns related to crematoriums, not a determination of what will occur on site. Please see Appendix G3 for the updated Health Assessment.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	control population, and exposure to fine particulates may occur..." (Page 137 of the Draft BAR);				
287.	<ul style="list-style-type: none"> <li>"Negative Impacts on the Surrounding Community:</li> </ul>				Thank you for your comment, it is noted. Please refer to responses in Section 2.3.2. of the comments and Responses Report.
288.	<ul style="list-style-type: none"> <li>General unease being close to a crematorium facility." (Page 153 of the Draft BAR).</li> </ul>				
289.	<p><b><u>The following was also noted:</u></b></p> <ul style="list-style-type: none"> <li>The existing building is currently built to the fence-line and it is unclear if this is permitted in terms of the relevant building regulations and requirements in terms of 'building lines';</li> </ul>				Thank you for your comment, it is noted.
290.	<ul style="list-style-type: none"> <li>No other section of the operation of the site is covered in any detail within the Draft BAR. There is therefore no understanding of the process of cadavers coming in, refrigeration, handling of cadavers, utilisation of any chemicals, offloading, etc. Are the refrigeration units/reefers operated with LPG or electricity? What are the fail safes should there be power cuts or outages and risk to bodies starting to decompose and associated</li> </ul>				Thank you for your comment, it is noted. Thank you for your comment, it is noted. Please refer to responses in Section 2.3.3.9. of the comments and Responses Report.



**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	vector or disease outbreaks? What safety measures are in place and what are the risks around handling and storage of cadavers? What alternative refrigeration options are available? In order to identify all potential impacts and risks associated with the operation of the crematorium, the entire site operation needs to be considered and not only the action of cremation of the body alone;				
291.	<ul style="list-style-type: none"> <li>No mention is made of the employees currently working at the chemical facility on site and whether the establishment of the crematorium will result in the closure of the facility and loss of income to the employees working there. This potential negative socio-economic impact has not been assessed or addressed;</li> </ul>				Thank you for your comment, it is noted. The previous landowner opted to sell the property, this is not an impact on the proposed development, and does not need assessment. Because a business moves premises doesn't mean employees lose their jobs, this is for the previous landowner to address.
292.	<ul style="list-style-type: none"> <li>The summary of socio-economic impacts provided in Section J 1.1 completely oversells and makes far</li> </ul>				Thank you for your comment, it is noted.

**APPENDIX D: COMMENTS AND RESPONSE TABLE**

**COMMENTS AND RESPONSES REPORT**

**POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY.**

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
	reaching claims regarding the economic benefits associated with the proposed development;				
293.	<ul style="list-style-type: none"> <li>The summary of environmental impacts provided in Section J 1.1 lists “no direct impacts on the natural environment” and “according to the specialist input air quality will not be compromised” as positive environmental impacts, which of course they are not. The lack of a negative impact does not make it a positive impact, and it is factually incorrect to state there will be no direct impact on the natural environment as the potential for impact on air quality IS an impact on the natural environment (for example). There are also potential impacts on groundwater, stormwater and soil from spills and leaks, as is noted within the Draft BAR;</li> </ul>				Thank you for your comment, it is noted. As a result of the construction there are no direct impacts on the natural portion of the site (intended for this area), and mitigation has been recommended to avoid any potential indirect impacts.
294.	<ul style="list-style-type: none"> <li>There are limited considerations made in the documentation with regards to fire-fighting and ventilation requirements for this development;</li> </ul>				Thank you for your comment, it is noted. Please refer to responses in Section 2.3.3.6. of the comments and Responses Report.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
295.	<ul style="list-style-type: none"> <li>Page 156 of the Draft BAR (last sentence of Section J 1.1) states that “As per the findings from environmental specialist input it has been established that the proposed development is acceptable, and the EAP is in agreement.” Nowhere in the Health Impact Assessment does it state that the development is acceptable. The Air Quality Assessment notes that “the crematorium is predicted to have a limited effect on air quality in the area”, which is difficult to substantiate without any form of impact assessment;</li> </ul>				Thank you for your comment, it is noted. Please refer to Section 2.3.1.1.
296.	<ul style="list-style-type: none"> <li>Although not a legislated requirement, best practice suggests that a meeting (or public meeting) with stakeholders could have been provided due to the socio-economic aspects associated with such a development;</li> </ul>				Thank you for your comment, it is noted. See meeting in minutes attached in Appendix D of the Comments and Responses Report.
297.	<ul style="list-style-type: none"> <li>The captions to the photos provided in Appendix C mention that the only visible changes to the building will be the chimney stacks “which is not unlike the other properties located in and around the area”. However, there are no photos showing any other chimney stacks in the area;</li> </ul>				Thank you for your comment, it is noted. Being an industrial area there are other emitters in the area, refer to Appendix G1 of the BAR.

## COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
298.	<ul style="list-style-type: none"> <li>The report states that “if biogas supply is available, this will be considered”. It is believed that this would be a significant change to the process description associated with the proposed development and would need to be subject to a separate study and separate specialist inputs should this be undertaken.</li> </ul>				Thank you for your comment, it is noted.
299.	<p><b><u>Errors in the Documentation</u></b></p> <p>Further to the above, the documentation made available for public review contained the following errors:</p> <p>1. Incorrect SG number (page 22 of the Draft BAR);</p>				Thank you for your comment, this has been corrected.
300.	<p>2. No indication of comment from DWS (page 23 of the Draft BAR);</p>				Thank you for your comment, see Appendix E3 of the BAR.
301.	<p>3. Copy and paste error regarding the summary of the findings of the health assessment (page 149 of the Draft BAR);</p>				Thank you for your comment, the Health Assessment has been revised and this has been corrected.
302.	<p>4. Locality and site plan map does not meet the requirements of the EIA regulations or the requirements as per the BAR template;</p>				Thank you for your comment, it is noted.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

NO.	COMMENT RECEIVED	DATE RECEIVED	I&AP	COMPANY/ ORGANISATION	RESPONSE
303.	5. Requirements listed in the appendixes for the BAR are not met (page 15 of the Draft BAR)				Thank you for your comment, it is noted.
304.	<b>3. Conclusion following Critical Review of Documentation</b>  As detailed in the sections above, it is believed that there are a significant number of shortcomings in the environmental impact assessment and associated specialist studies undertaken for the proposed crematorium development, some of which are believed to be fatal flaws that should be considered as reasons for the competent authority to reject an EA for the development. It is clear that the EAP did not adequately review the specialist studies, which have a large number of errors and omissions therein and do not provide an assessment of the potential impacts associated with the proposed crematorium development within their respective specialist fields. The assessment of impacts and clear requirements in terms of mitigations and recommendations is the exact reason why such studies are commissioned and required within the environmental authorisation process.				Thank you for the comment, it is noted.

**COMMENTS RECEIVED DURING THE (30-DAYS) PUBLIC PARTICIPATION ON THE POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT (11 JULY 2022 – 11 AUGUST 2022)**

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305.	It is apparent from the Draft BAR that the EAP has not been impartial in their assessment of the proposed project, and has not fairly and justly considered both the positive and negative impacts of the proposed development, with negative impacts not properly assessed and considered, and positive outcomes overstated.				Thank you for your comment is it noted.
306.	<b>4. We trust that you will find the above in order and kindly keep us informed with regards to the application relevant hereto.</b>				



Tuesday, 6 September 2022

### COMMENTS RECEIVED REGARDING PROPOSED CREMATORIUM

Dear Ameesha,

An advertisement was placed in the Cape Times on Friday the 15th of July 2022 regarding an Atmospheric Emissions Licence application for Platinum Pride's proposed crematorium. The following comments/requests were received:

Name	Contact	Comment
Cliff	021 202 8246 capesales@multiquip.co.za	Requested that he be added to the I&AP register, and had an objection based on the proximity of the proposed crematorium to other businesses and his belief that the proposed location is inappropriate for a crematorium.
Fatima Luis-Craig	021 551 7618 Fatima@improvon.co.za	Requested a copy of the AEL application. The AIR was sent, with reference made to sections 3 to 6 which constitute the AEL application.
Melissa Groenink	021 671 7002 melissa@greencounsel.co.za	Requested a copy of the AEL application. The AIR was sent, with reference made to sections 3 to 6 which constitute the AEL application. Comments provided, as detailed in SES's comments and responses document.
Temosho Sekgobela	087 362 4107 temosho.sekgobela@takealot.com	Comments provided, as detailed in SES's comments and responses document.

Kind regards,



Caitlin Morris  
BSc (Chem Eng), LLM (Environmental Law)  
Senior Chemical Engineer  
083 566 2552 | [caitlin@yellowtree.co.za](mailto:caitlin@yellowtree.co.za) | [www.yellowtree.co.za](http://www.yellowtree.co.za)

