

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

COMMENT	NAME/ORGANISATION	RESPONSE
<p>The Directorate: Development Management (Region 3) ('this Directorate') has reviewed the information contained within the pre-application Basic Assessment Report ('pre-app BAR') and provides the following comment: <i>Water Use License Amendment Application</i></p> <p>The documentation in respect of the application for amendment of the Water Use License ('WUL') for the Gwaiing Wastewater Treatment Works ('WWTW') in terms of the National Water Act, Act 36 of 1998 ('NWA') (Ref: WU38758) was submitted to this Directorate on 19 August 2025 for comment for a period of 60 days.</p> <p>According to sub-section 24C(11) to the National Environmental Management Act, Act 107 of 1998, as amended ('NEMA') <i>"a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for"</i>.</p> <p>In light of the above, it must be ensured that the application processes in terms of NEMA and the NWA are synchronised. In this regard, it is advised that your appointed EAP and / or the consultant responsible for the Water Use Authorisation ("WUA") process liaise</p>	<p>Department of Environmental Affairs and Development Planning Steve Kleinhans</p> <p>28 August 2025</p>	<p>This is understood, the WULA information will be included with the Final BAR.</p>

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>and consult with one another. Furthermore, the information in respect of the application for the amendment WUL (including information from the WUL amendment public participation) must be included in the BAR.</p> <p>NOTE: The Directorate will provide separate comment on the application for the amendment o the WUL. The comment will be issued within 60 days from the date of receipt of the documentation in respect of the application.</p> <p>You are reminded that if these processes are not properly aligned, the lack of synchronisation; omission of any reports/information; or delay as a result thereof, may prejudice the success of the application for environmental authorisation.</p>		
<p><i>Process in terms of the National Heritage Resources Act, Act 25 of 1999</i></p> <p>According to the pre-app BAR the proposed Biosolids Beneficiation Facility ('BBF') will be approximately 30 000m² (3ha) in extent and will be located outside the current fenced area of the Gwaiing WWTW. As such, it is reasonable to expect that the proposed BBF will trigger Section 38(1) of the National Heritage Resources Act, Act 25 of 1999 ('NHRA'). It is understood that a heritage specialist has been appointed to submit a Notice of Intent to Develop ('NID') to Heritage Western Cape ('HWC'). In this regard, please be advised that from 1 September 2025 all applications in terms of Section 38 of the NHRA to HWC must be submitted via the South African Heritage Resources Information System</p>		<p>The HWC NID has been submitted and HWC has indicated that no further Heritage Resources Impact Assessment is required.</p>

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>('SAHRIS'). Please be reminded that where studies are required by HWC that the relevant report must comply with the minimum report requirements specified in Appendices 1 and 6 of the Environmental Impact Assessment Regulations, 2014 ('EIA Regulations, 2014') (Government Notice No. R. 982 of 4 December 2014, as amended).</p> <p>Section 38 of the NHRA sets out the requirements regarding the integration of the decision-making process with that of the EIA Regulations, 2014; however, under the proviso that the necessary information is submitted and any comments and recommendations of the relevant heritage resources authority (HWC) with regard to such development have been provided and taken into account prior to the granting of the authorisation. Further to the above:</p> <ul style="list-style-type: none"> • An application for Environmental Authorisation, must include, where applicable, the investigation, assessment and evaluation of the impact of any proposed listed or specified activity on any national estate referred to in section 3(2) of the NHRA, excluding the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act. • Where Section 38 of the NHRA is triggered, the Standard Operating Procedure between Heritage Western Cape and this Department must be followed. If Section 38 is applicable to the proposed development, then the proponent/applicant is required to submit a Notice of Intent to Develop ("NID") to Heritage Western Cape and attach a copy to thereof to the EIA application form. If Heritage Western Cape requires a Heritage Impact 		
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COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>Assessment, the Heritage Impact Assessment must be undertaken as one of the specialist studies of the EIA process to be undertaken in terms of the NEMA EIA Regulations, 2014.</p>		
<p>Stormwater Management Plan It is understood that the details of the roads and stormwater infrastructure will be developed during the detailed design phase. According to the pre-app BAR a new stormwater system will convey stormwater through concrete pipes which will drain to the existing maturation ponds (via the inlet works) from the concrete slabs of the BBF.</p> <p>According to the Aquatic Biodiversity Impact Assessment for the BBF dated 14 May 2025, the southern portion of the BBF slopes more steeply towards the south (towards a drainage line – HGM 4). Therefore, it is expected that stormwater from the southern portion of the BBF will drain towards the drainage line and subsequently towards the Gwaiing River.</p> <p>In light of the above, it is required that a preliminary stormwater management plan be compiled and included in the BAR. The plan must also address how stormwater during heavy rainfall events will be accommodated and managed to prevent erosion, especially along HGM 4 identified in the Aquatic Biodiversity Impact Assessment. The plan must also detail contingency plans for events where contaminated water may enter the respective stormwater infrastructure and respective watercourses.</p>		<p>According to the Preliminary stormwater management plan (appendix L):</p> <p>The proposed stormwater drainage system for the Gwaiing WWTW for the ultimate design scenario shall consist of:</p> <ul style="list-style-type: none"> • The roads shall be constructed with Mountable Kerbs (MK) to provide conveyance capacity and act as cut-offs for the downstream WWTW infrastructure. 465m of road shall be served by a minor stormwater drainage system consisting of 185m of 450mm diameter and 280m of 600mm diameter stormwater pipes and associated catchpits, to allow the road cross-section to generally convey up to and including the 100-year return period. • The BBF's platforming, bulk earthworks and / or roof guttering shall be designed to: <ul style="list-style-type: none"> ◦ Drain a 2.7 hectare contributing catchment to the north-western corner of the BBF. A 600mm diameter Class 100D pipeline with an approximate length of 160m and which shall convey the 10-year return period of 0.44 m³/s shall discharge into the 600mm diameter stormwater line conveying runoff to the maturation ponds. Flows greater than the 10-year return period shall be conveyed overland in a westerly direction.

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

		<ul style="list-style-type: none"> ○ Drain a 0.68 hectare contributing catchment south via a 450mm diameter stormwater pipeline, which shall discharge into a new reactor. The 0.68-hectare catchment area, with an estimated 10-year peak runoff of 0.11 m³/s, shall contain the sludge stockpiles, and runoff may be contaminated; hence routing of the runoff to the reactor for treatment. • All other runoff shall consist of overland / surface flow with no structural stormwater drainage infrastructure proposed. • The existing maturation ponds shall not overtop the main embankments (i.e. excluding the berms acting as weirs between the four maturation ponds); therefore direct discharge into the Gwaing River and its tributary shall not occur for up to and including the 100-year return period storm event. <p>It is recommended that:</p> <ul style="list-style-type: none"> • The proposed stormwater drainage system be utilised during the ECSA Stage 3 (Detailed Design) stage of the project. • Due to the erodible nature of the soils, it is recommended that suitable localised measures be considered at each building and structure (e.g. earthworks profiling to route surface runoff around the building / structure) to avoid potential scour / undercutting of foundations. This would form part of the detailed design and is not considered to be bulk stormwater infrastructure. • Erosion protection must be constructed at all stormwater outlets to mitigate erosion.
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COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

		<ul style="list-style-type: none"> The open areas should be suitably vegetated and maintained to protect the natural soils from erosion. <p>HGM 4 is more than 100m away from the proposed BFF and therefore, provided stormwater runoff is managed appropriately, it is unlikely to be impacted by the project.</p> <p>In addition, the Aquatic biodiversity Assessment Report provides rehabilitation guidelines and recommended interventions aimed at stabilising the affected wetland areas and preventing erosion.</p> <p>The following interventions are recommended:</p> <ol style="list-style-type: none"> Channel Erosion Rehabilitation <ul style="list-style-type: none"> Grade-Control Structures <ul style="list-style-type: none"> Gabion weirs or rock-packed check dams spaced at intervals (typically every 15–25 m, depending on slope) to create a stepped longitudinal profile. Log or brush weirs (bio-check structures) for smaller, shallower sections -constructed from anchored logs or brush fascines, backfilled with brush and rock. Reno mattresses on flatter gradients to spread flow and trap fine sediment. Two-Stage Channel Design <ul style="list-style-type: none"> Excavate inset floodplain benches along one or both sides of the entrenched channel. The main (low-flow) channel conveys baseflow, while benches accommodate moderate flood events. Benches should be vegetated with emergent wetland species to stabilise soils and slow overbank flow. Flow Energy Dissipation at Discharge Point
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COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

		<ul style="list-style-type: none"> Construct a stilling basin or plunge pool immediately below the outlet. Install rock rip-rap aprons or cascades with variable stone sizes to break up turbulence. Incorporate a v-notch spreader weir to distribute flow evenly into the wetland channel. <p>4) Channel Re-Profiling and Benching</p> <ul style="list-style-type: none"> Cut back vertical banks and re-grade to stable slopes. Place excavated material behind erosion control structures for backfilling. Plant or seed with indigenous wetland and riparian vegetation. <p>5) Bio-engineering Measures</p> <ul style="list-style-type: none"> Coir logs, brush mattresses, bundles, or plant plugs with indigenous species (e.g., <i>Phragmites australis</i>, <i>Juncus kraussii</i>, <i>Cyperus textilis</i>). Protect young vegetation with temporary fencing from trampling by livestock.
<p>Proposed Biosolids Beneficiation Facility</p> <p>According to the pre-app BAR the proposed BBF will receive dewatered sludge from the WWTW. The sludge will be placed on concrete platforms which will have a total development footprint of 30 000m² (3ha) for the various stages of sludge processing. It is understood that two sludge disposal options are being considered i.e., producing fertilizer and composting (not preferred).</p> <p>It is understood that the proposed BBF will have approximately 13 000m² (1.3ha) of translucent roof sheeting ('greenhouse') structures. However, the total development footprint of the concrete platforms will be 3ha (30 000m²). It is therefore evident</p>		<p>The preliminary stormwater management for the Gwaing WWTW is included in the BAR as appendix L.</p> <p>As shown in the previous response outlining the facilities stormwater management, all stormwater from the BBF will be directed to the treatment inlet works and will therefore be treated by the facility as raw sewage.</p> <p>Biosecurity risks related to the BBF are addressed in the BAR and EMPr.</p> <p>Outsourcing Operation of Biosolids Beneficiation Facility Operation</p>

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>that 1.7ha of the proposed BBF will remain uncovered which raises concern regarding the contamination of stormwater, groundwater and areas downstream of the BBF during heavy rainfall conditions.</p> <p>With reference to 2.3 above, the stormwater management plan must also address contamination of stormwater emanating from the proposed BBF.</p> <p>A further issue which must be addressed is the risk of the proposed facility to the biosecurity of specific land-uses in proximity to the WWTW (i.e., agricultural land-uses; poultry facilities etc.). Notwithstanding the roof area, the risk of access to the BFF and mitigation measures aimed at preventing the spread of harmful organisms must be addressed in the BAR and EMPr.</p>		<p>The George Municipality officially and successfully awarded a long-term contract (10 years with a further possible 5-year extension) to Agriman (Pty) Ltd for the operation of the proposed Biosolids Beneficiation Facility (BBF) on 29 December 2025.</p> <p>During the procurement process, and to award long-term contracts, the Municipality was required to assess risks, rewards and capability of outsourcing the service. The assessment revealed the following.</p> <p>Agriman (Pty) Ltd is a South African based company established in 1988 with an international footprint that provides a complete value chain solution for the handling, processing, and beneficiation of wastewater sludge to a commercially marketable registered fertilizer product.</p> <p>With a proven track record and well-established value chain for its organic fertilizer product and has been in the industry for over 30 years providing unique and innovative solutions for the beneficiation of wastewater sludge.</p> <p>Agriman currently has 29 permanent employees and supplementary technical and non-technical staff performing functions ranging from operating dewatering plants to the final blending and marketing of fertilisers in the agricultural sector.</p> <p>Agriman has long term contracts with:</p> <ul style="list-style-type: none"> • City of Windhoek: Gammams WWTW • City of Tshwane: Rooiwal and Sunderland Ridge WWTW's Rustenburg Trust: Rustenburg WWTW
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COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

		<p>The sludge beneficiation model developed by Agriman has been proven to be a sustainable model and was awarded the Green Economy Change Champion award in 2021 in partnership with the City of Tshwane as a unique and sustainable solution with a proven track record.</p> <p>Agriman has developed and established the marketing channels for the fertilizer product into a high-tech precision practice or the commercial agricultural sector. The distribution channels include agronomical advice, design and establishment of fertilizer blending plants, marketing and educating end user of the product, product development and marketing campaigns.</p> <p>The appointed service provider will ensure that the facility is managed and operated in accordance with relevant regulatory requirements and best operational practices to minimise biosecurity risks.</p> <p>The George Municipal waste management plans (Waste Minimization Plan June 2022 (draft), and Integrated Waste Management Plan (IWMP) 3rd generation 2020 to 2025 focusses on compliance, sewage sludge disposal, prioritization of waste away from landfills including sewage sludge. Promoting resource recovery and environmental impact reduction.</p> <p>The proposal to implement the BBF aligns with the George Municipal waste management plan as well as the national (2018 State of Waste report & 2020 National Waste Management Strategy) and provincial targets (2020/21 WCG</p>
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COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

		<p>sewage sludge status quo report) to divert organics away from landfills.</p> <p>The BBF was planned and designed taking the Guidelines for Utilisation and disposal of wastewater sludge, volume 1 to 5 (2009) into account.</p>
<p>Reuse of treated effluent</p> <p>It is understood that three options for the reuse of treated effluent have been identified namely:</p> <p>Option 1: tie into the Outeniqua WWTW reuse system through the Garden Route Dam indirect potable reuse (IPR) system;</p> <p>Option 2: implementation of an independent industrial reuse system from Gwaiing WWTW; and</p> <p>Option 3: Implementation of an independent direct potable reuse (DPR) system from Gwaiing WWTW.</p> <p>Notwithstanding the information that Option 1 is not viable since the bio trickling filter process train will be demolished. No information regarding the infrastructural requirements for the various options to realise the implementation thereof has been provided. It is therefore unclear whether identified options and their associated structures and infrastructure will require environmental authorisation prior to the implementation thereof.</p> <p>In light of the above, clarity is required regarding the location / route, size and development footprint any link infrastructure from the Gwaiing WWTW to the existing receiving infrastructure to realise the implementation of the proposed reuse of treated effluent.</p>		<p>Additional information on the reuse of treated effluent has been included in the BAR.</p> <p>Option 1: The use of treated effluent from Gwaiing at the Outeniqua UF plant will be done through a separate NEMA process and does not form part of this process. A 450m diameter pipe is estimated and will follow the sludge pumping main between the WWTWs, the pump station will be located within the Gwaiing WWTW.</p> <p>Option 2: There is no current plans to implement this infrastructure due to the cost involved and lack of interest from industries.</p> <p>Option 3: See description in the draft BAR. The pumpstation will be within the Gwaiing WWTW footprint, the existing potable water pipeline will be relined and the new Potable water pipeline will be relined and the new portion of pipeline between the R102 and the Gwaiing WWTW will have to follow the road reserves of the Gwayang development. It is not foreseen that a NEMA processes required, but will be confirmed once concept designs have been developed and the interested parties have agreed to receiving the treated effluent formally.</p>
Operation and Maintenance Manual		

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>It is noted that the Operations and Maintenance Manual ('OMM') for the current Gwaiing WWTW has been included in the BAR. In this regard, it is advised that the OMM must be updated to address any operation and maintenance issues which may be experienced by the upgraded facility.</p>		<p>An operational and construction EMP has been included in the BAR as appendix H.</p> <p>The O&M manual is generally only provided once the upgrade is complete. The O&M requirements remain the same as the hydraulic capacity of the treatment works is increased. The only changes is the BBF and the grit & screening facility.</p>
<p>Implementation programme</p> <p>Please note that, in accordance with the provisions of the EIA Regulations, 2014, a period for which the environmental authorisation is required must be provided. This period must be informed by the operational aspects and the non-operational aspects of the proposed development.</p> <p>In this regard, the timeframes for the commissioning of the various phases are described in Section J: 2.5 (pg. 104). It is understood that the final phase (Phase D) is estimated for commissioning by year-2051 based on a population growth of 4%. It unclear how this is justified in light of the fact that the proposed commissioning for Phase C and D will fall in future Municipal IDP cycles, and the availability of funding cannot be demonstrated at this stage. Furthermore, it is noted that the EAP recommends that the environmental authorisation have a validity period of 30 years to allow enough time for the proposed upgrades to be undertaken as required to match population growth, the rehabilitation of the site and allow for the defect liability period to complete. This aspect will be considered; however, please note that it may not necessarily be approved as such.</p>		<p>While population growth is difficult to predict and forecast accurately, the future upgrades to the facility will definitely be required. Due to the limited nature of the upgrades being within the existing facility it seems to be a very proactive approach to have the total upgrades authorised to implement upgrades as needed. We will request that your department please issue the authorisation for as long as possible.</p>
<p>Environmental Management Programme:</p>		<p><u>Operational aspects</u></p>

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>The contents of the EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of the EIA Regulations, 2014. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). This Department has reviewed the EMPr as included and received as part of the pre-application BAR. The following aspects must be addressed:</p> <p>Operational Aspects The EMPr must specifically deal with the operational aspects of the proposed activities including the monitoring and reporting during the operational phase.</p> <p>Environmental Auditing According to the EMPr the Environmental Control Officer ("ECO") must undertake a final inspection (audit) six months of completion of construction activities. Please be advised that a clear distinction must be made between an environmental monitoring report (to be compiled by the ECO) and an environmental audit report (to be compiled by independent person with the relevant environmental auditing expertise). In this regard, please note that the environmental auditor cannot be the EAP or the ECO. Furthermore, take note of the auditing requirements with regard to environmental authorisations and EMPr's under Regulation 34 of the EIA Regulations, 2014 (as amended). In this regard, the EMPr must be amended to ensure compliance with the requirements. The contents of the</p>		<p>An operational EMP has been included in the BAR as Appendix L.</p> <p><u>Environmental Auditing</u> Please refer to Section 18.1 of the EMPr.</p> <p><u>Notices to the competent authority</u> Please refer to Section 18.3 of the EMPr</p>
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COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>environmental audit report must comply with Appendix 7 of the EIA Regulations.</p> <p>Further to the above, the EMPr must specify the intervals for the submission of the independent audit reports. Please be advised that in accordance with Regulation 26(e) of the EIA Regulations, 2014 the frequency of auditing compliance with the environmental and EMPr may not exceed intervals of five years.</p> <p>Notices to the Competent Authority</p> <p>With due consideration of the proposed implementation programme in respect of the various phases, the EMPr must include a section dealing with notifying the competent authority in respect of the commencement of and conclusion of the various phases (temporary pause of construction activities) of the proposed upgrades. Temporary pause notices must also describe any measures that may be required to prevent the degradation of the environment including, but not limited to, issues such as erosion, pollution etc.</p>		
<p>Please note that a listed activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A of the National Environmental Management Act, 1998 (Act no. 107 of 1998) ("NEMA") 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 of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not</p>		

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

<p>exceeding 10 years, or to both such fine and imprisonment.</p> <p>4. Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.</p> <p>5. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.</p>		
<p>1. The upgrade must take place without reducing the current capacity of the Gwaing WWTW. The upgrade plan must include how capacity will be retained during the construction phase when it becomes necessary to take certain equipment items offline to be replaced or refurbished. This is especially important during winter and periods of high inflows.</p>	<p>Department of Environmental Affairs and Development Planning RUSSELL MEHL Directorate: Pollution and Chemicals Management</p>	<p>The upgrades will be undertaken alongside existing infrastructure without reducing current capacity</p>
<p>2. The current discharge point or any areas that impact on the Gwaing River is of a concern as repair of piping infrastructure is often required. These infrastructure items are often damaged due to natural occurrences such as flooding or storms. Fig 4 of the aquatic study shows that the infrastructure proposed may be impacted on parts of both perennial and non-perennial water courses. Does this upgrade include a River Maintenance Management Plan (MMP) to deal with emergency work that may be required. This is listed as part of activity 19 on page 34.</p>		<p>Yes, a river rehabilitation is proposed to strengthen the resilience of the outlet point to ensure uncontrolled erosion does not result from the upgrades.</p>
<p>3.</p>		<p>These approaches will be explored at the time and any EIA</p>

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

On page 34 of the report do the six items listed under Phase B waste reduction and resource recovery form part of this EIA process or will it be applied for separately.		requirements will be undertaken if needed. Forms part of this application
4. In situations where sewage piping infrastructure has been compromised as a result of stormwater ingress, a much higher volume of inflows can be expected. Has an assessment been made of these compromised connections and has the additional inflow volumes been catered for in the Phase 1 upgrade.		The GM Sewer master plan allows for storm water ingress of up to 50%, this includes the hydraulic capacity of the WWTW in handling storm flows. The relevant municipal department is investigation areas with high stormwater ingress with the intent to reduce the impact of stormwater ingress into the sewer system and the consequential impact. This is however and ongoing process of investigation, elimination and continued follow up to ensure non-compliant properties do not default
This Municipal Health Services office has no objections towards The proposal of the proposed upgrade of the Gwaing Wastewater Treatment Works on Erf RE/464, George. 1. Ensure that all practical measures to minimise the impact of operations on the environment have been included in plans / programmes and emergency plans have been developed.	Garden Route District Municipality C. Jantjies 14 August 2025	
2. Ensure that all staff have the appropriate level of environmental awareness and competence to ensure continued environmental due diligence and ongoing minimization of environmental harm.		the George Municipality will be responsible for ensuring all staff comply with the Environmental Requirements of the EMPr
3. Proper storage facilities for the storage of oils, paints, grease, fuels, chemicals and any hazardous materials to be used must be provided and must conform to the relevant safety requirements to prevent the migration of spillage into the ground and		All activities, apart from the facility outlet is located further than 20m from a water course, additional the storage of hazardous substances will have to comply with the relevant safety standards.

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

groundwater regime around the temporary storage area(s). Hazardous substances must be stored at least 20m from any water bodies on site to avoid pollution.		
4. All major spills of any materials, chemicals, fuels or other potentially hazardous or pollutant substances must be cleaned immediately, and the cause of the spill investigated. Preventative measures must be identified, and emergency response procedures followed and implemented.		Mitigation measures in the EMPr and careful planning of operations will mitigate potential spills. Responses appropriate to the type of spill will be implemented. Most of the work will be within the existing footprint away from water courses so there is minimal risk of watercourse contamination.
5. The Contractor must provide sufficient ablution / sanitary facilities, in the form of portable or VIP toilets, at the Construction Camp(s), and must conform to all relevant health and safety standards and codes. Where French drain systems or soak away systems are used, it may not be situated within 50 meters of any surface water body or within 1:100-year flood line. Sufficient toilets must be provided to accommodate the number of personnel working in the area (1 toilet per every 15 workers) at appropriate locations on site during construction and the operational phase.		This is a construction standards requirement and included in the EMPr
6. All waste generated on site during construction should be stored in waste bins and removed from site on a regular basis.		This is a requirement in the EMPr and will be monitored by the appointed ECO.
7. Broken or old batteries or components of the plant should be stored in a demarcated area in quarantine for the shortest period possible until it can be collected and taken to a special chemical waste facility.		This recommendation is included into the EMPr.
8. Food preparation areas must be provided with adequate washing facilities and food refuse		This recommendation is included into the EMPr.

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADE OF THE GWAIING WASTEWATER TREATMENT WORKS ON THE REMAINDER OF ERF 464, GEORGE, WESTERN CAPE.

must be stored in sealed refuse bins which must be removed from site on a regular basis.		
9. Provision of sufficient ventilation in all the houses.		The housing will comply with building standards and does include ventilation.
10. All extensions must be connected to an approved sewerage system.		The upgrades are proposed to the Gwaing Wastewater treatment works and will comply with the relevant standards
11. Drainage system should be connected to the municipal line.		Stormwater drainage will be into the existing system.
12. Provision of sufficient lighting should be in place.		Sufficient lighting will be included. These will comply with the relevant requirements/building standards.
13. Provision of safe drinking water should be made available and comply with SANS241		This recommendation is included into the EMPr.
14. Ensure compliance with relevant legislation pertaining to municipal health		All municipal bylaws have been taken into account for this proposed upgrade of the municipal WWTW.