



**S24G APPLICATION FOR RECTIFICATION THE UNLAWFUL
COMMENCEMENT OF ACTIVITIES LISTED IN TERMS OF THE NATIONAL
ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) AS
AMENDED, AND IN TERMS OF SECTION 20 OF THE NATIONAL
ENVIRONMENTAL MANAGEMENT: WASTE ACT, 2008 (ACT 59 OF 2008)**

**S24G APPLICATION FOR RECTIFICATION (POLOKWANE WASTE TYRE PRE-PROCESSING
DEPOT)**

June 2016

COMPILED BY:

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LIMPOPO
PROVINCIAL GOVERNMENT
REPUBLIC OF SOUTH AFRICA

DEPARTMENT OF
ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM

Application form for the rectification of unlawful commencement or continuation of a listed activity in terms of S24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.

2010

Kindly note that:

1. This application form must be completed for all applications in terms of S24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.
2. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the application form have been published or produced by the relevant competent authority.
3. The content of the application for rectification form comprises of:
 - Section A: Application Information
 - Section B: Activity Information
 - Section C: Description of Receiving Environment
 - Section D: Preliminary Impact Assessment
 - Section E: Alternatives
 - Section F: Appendices
 - Section G: Declarations
4. An independent EAP must be appointed to complete the application form on behalf of the applicant; the declaration of independence must be completed by the independent EAP and submitted with the application.
5. The required information must be typed within the spaces provided. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The space provided extend as each space is filled with typing. A legible font type and size must be used when completing the form. The font size should not be smaller than 10pt (e.g. Arial 10).

The use of "*not applicable*" in the application form must be done with circumspection.

*Evidiki Towers, 20 Hans van Rensburg Street, POLOKWANE, 0700, Private Bag X9484,
POLOKWANE, 0700*

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6. No faxed or e-mailed applications will be accepted. This application form must be submitted by hand or mailed to the relevant competent.
7. Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. Upon request, any interested and affected party must be provided with the information contained in and attached to this application form.
8. This application form constitutes the initiation of the S24G application process.

DEPARTMENTAL DETAILS

**The Senior Manager: Integrated Pollution and Waste Management
Department of Economic Development, Environment and Tourism
Corner Suid and Dorp Street, Polokwane
Private Bag X9484
Polokwane
0700**

SECTION A: APPLICATION INFORMATION

1. APPLICANT PROFILE INDEX

Cross out the appropriate box "X".

1.1	The applicant is an individual	YES	NO
1.2	The applicant is a company	YES	NO
1.3	The applicant is a state-owned enterprise or municipality	YES	NO
1.4	Other (specify)	YES	NO
1.5	There is more than one individual / company responsible for the unlawful commencement of listed activities	YES	NO

Name of Project applicant:	Phasha Property Investments CC		
RSA Identity number:	N/A		
Contact person:	Mr Oscar Phasha		
Position in company	Managing Director		
Registered Name of Company/ Closed Corporation	Phasha Property Investments CC		
Trading name (if any):	Phasha Property Investments CC		
Registration number	1991/17244/23		
Postal address:	P.O Box 5527		
	Polokwane North	Postal code:	0750
Telephone:	(015) 291 3839	Cell:	082 457 9370
E-mail:	info@recycle.mpih.co.za	Fax:	(015) 291 4986
Please Note: In instances where there is more than one individual / company responsible for the unlawful commencement of listed activities, please attach a list of with all contact details to the back of this page.			

Environmental Assessment Practitioner (EAP):	Ms. Jubilee Bubala		
Contact person:	Mr Gesan Govender		
Postal address:	P.O. Box 1898,		
	Sunninghill	Postal code:	2157
Telephone:	(0861) 44 44 99	Cell:	083 419 8905
E-mail:	gesan@envirolution.co.za	Fax:	(086) 1 626 222
EAP Qualifications	BSc (Hons)		
EAP	Registered with the South African Council for Natural Scientific Professions (No:		

Registrations/Associations	400049/12)					
Name of Landowner(s):	Phasha Property Investments CC					
Contact person(s):	Mr Oscar Phasha					
Postal address:	P.O Box 5527					
	Polokwane North		Postal code:	0750		
Telephone:	(015) 291 3839		Cell:	082 457 9370		
E-mail:	info@recycle.mpih.co.za		Fax:	(015) 2914986		
Please Note: In instances where there is more than one landowner, please attach a list of landowners with their contact details to the back of this page.						
Municipality in whose area of jurisdiction the activity falls:	Polokwane Local Municipality					
Contact person:	Mr Phineas Tjikana					
Postal address:	Civic Centre, Corner Landros Mare and Bodenstein Street, Polokwane					
	Polokwane, 0700		Postal code:	P.O. Box 4100		
Telephone	(015) 290 2000		Cell:			
E-mail:	PhineasT@polokwane.gov.za		Fax:	() 015 2914297		
Please Note: In instances where there is more than one Municipality involved, please attach a list of Municipalities with their contact details to the back of this page.						
Project title:	Environmental Assessment in terms of Section 24G of NEMA application for a Polokwane Pre-Processing Waste Tyre Depot, Polokwane, Limpopo Province.					
Property location:	1 Hector Plot of Farm, Geluk outside Polokwane (off R71 towards Tzaneen)					
Farm/Erf name & number (incl. portion):	Plot 10 Geluk					
SG21 Digit code:						
Co-ordinates:	Latitude (S):			Longitude (E):		
	23°	54'	15.09"	29°	32'	2.42"E "
Please Note: Where a large number of properties are involved (e.g. linear activities), attach a list of property descriptions to the back of this page. Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates must be in degrees, minutes and seconds. The minutes must be given to at least three decimals to ensure adequate accuracy. The EAP is required to contact the relevant competent authority with regards to the projection that must be used.						
Street address:	off R71 towards Tzaneen					
Magisterial District or Town:	Polokwane, Capricorn District, Limpopo Province					

Please Note: In instances where there is more than one town or district involved, please attach a list of towns or districts as well as complete physical address information for the entire area to the back of this page.
Not Applicable only one Municipality and District

Closest City/Town:	Polokwane	Distance	8Km
Zoning of Property:	Agriculture NB: In December 2015 Polokwane Municipality took decision to grant storage facility businesses operating rights to plots adjacent to Road R71. Plot 10 Geluk and Plot 9 Geluk are Affected By the decision. Rezoning or consent use will be pending regarding confirmation from the Municipality. Hence we await the confirmation from the Municipality regarding the transfer of these properties.		

Please Note: In instances where there is more than one zoning, please attach a map clearly indicating zoning of the different portions.

Was a rezoning application required?	YES	NO
Was a consent use application required?	YES	NO

Rezoning application or consent use application cannot be determined at this stage until the Municipality gives us a confirmation if we would be exempted or not as stated above.

Please Note: Where planning approvals have been granted please attach the relevant approvals.

Owners consent:	Applicant is the registered landowner
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2. APPLICATION HISTORY

(Cross out the appropriate box "☒" and provide a description where required).

Has any national, provincial or local authority considered any development applications on the property previously?	Yes	No ^x
If so, please give a brief description of the type and/or nature of the application/s: (In instances where there were more than one application, please attach a list of these applications)		
Has any one of the previous application/s on the property been approved or rejected so provide a list of the successful and unsuccessful application/s and the reasons decision/s.	Yes	No ^x
Provide detail on the period of validity of decision(s) and expiry dates of the above applications/ permits etc.		

I hereby apply in terms of Section 24 G of the National Environmental Management Act (Act no 107 of 1998 as amended) for the rectification of the unlawful commencement or continuation of the listed activity(ies) in Section B of the application form:

Applicant (Full names) Mabogale Oscar Phasha

Signature: 

Place: POLOKWANTO

Date: 20 June 2016

EAP (Full names) _____

Signature: 

Place: VISTA PLACE, GLENADA

Date: 21.06.2016

SECTION B: ACTIVITY INFORMATION

1. ACTIVITIES APPLIED FOR:

Separate rectification applications are required for one development site where more than one listed activity has commenced and where these unlawfully commenced activities constitute offences in terms of different EIA regulations (refer to Table 1 & 2 of the S24G guideline).

Applicants and EAPS are strongly advised to discuss the merits of a combined application (*if deemed applicable*) with the relevant competent authority prior to the completion of this application form and submission thereof.

The relevant competent authority will use its discretion in deciding to allow one rectification application for more than 1 Section 24F (2(a) contravention on one development site.

All potential listed activities associated with the development must be indicated below. (See Annexures B, C, D and E). Only those activities for which the applicant applies will be considered.

The onus is on the applicant to ensure that all the applicable listed activities are included in the application.

Listed activities applied for. Identify the relevant listed activities applied for below:

ECA EIA Contraventions : Between 08 September 1997 end of day 09 May 2002	
Activities unlawfully commenced with on or after 08 September 1997 and before end 09 May 2002: EIA Regulations promulgated in terms of the ECA, Act No 73 of 1989, as amended	
Listed Activity(ies)	Details of Activity(ies)

ECA EIA Contraventions : Between 10 May 2002 and before end of day 02 July 2006	
Activities unlawfully commenced with on or after 10 May 2002 and before end 02 July 2006: EIA Regulations promulgated in terms of the ECA, Act No 73 of 1989, as amended	
Listed Activity(ies)	Details of Activity(ies)
GN R. 149 of 13 Feb 2009	Waste tyre Regulations,2008

NEMWA, 2009: Between 01 July 2009 and before end of day	
Activities unlawfully commenced with in terms of the NEMWA, 2008 promulgated in terms of the NEMA, Act No 107 of 1998 after 01 July 2009 and before 29 November 2013	
Government Notice No. 718 List of Waste Management Activities No(s):	Details of Activity(ies) requiring Basic Assessment
Government Notice No. 718 List of Waste Management Activity No(s):	Details of Activity(ies) requiring a Scoping Report and EIA

NEMWA, 2009: Between 29 November 2013 and before end of day	
Activities unlawfully commenced with in terms of the NEMWA, 2008 promulgated in terms of the NEMA, Act No 107 of 1998 after 29 November 2013.	
Government Notice No. 921 List of Waste Management Activities No(s):	Details of Activity(ies) requiring Basic Assessment
Category A 3(2)	The sorting, shredding, grinding, crushing, screening or bailing of general waste at a facility that has an operational area in excess of 1000m ² .
Category A 3(12)	The construction of facility for a waste management activity listed in Category A of this Schedule (not is isolation to associated waste management activity).
Category C 5(3)	The storage of waste tyres in storage areas exceeding 500m ²
Government Notice No. 921 List of Waste Management Activity No(s):	Details of Activity(ies) requiring a Scoping Report and EIA
	N/A

2. ACTIVITY DESCRIPTION

(Cross out the appropriate box "X" and provide a description where required).

(a) Is/was the project a new development or an upgrade of an existing development?	New - X	Upgrade
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(b) Clearly describe the activity and associated infrastructure commenced with, indicating what has been completed, what still has to be completed and applicable commencement dates.

The activities being undertaken on site involve baling of tyres in a waste management facility that has a total operational area of 10 000 m² (of which 3200 m² is the operation area and 7800m² is the storage area. The storage area is approximately 2200m² (excluding firebreaks). Current baling area is 100m² with an additional 100m² covered by an extension of the baling shed and 25m² office area. The types of tyre waste being handled on site include the following:

- Passenger vehicle tyres
- Truck tyres
- Motorbike tyres and
- 4x4 vehicle tyres
- Light commercial vehicle tyres
- Off-The-Road tyres (OTR) with <35inch/89cm diameter.

The waste management activities on site commenced in December, 2014. The operations is mechanized and involve the following process:

The Basic Waste Tyre Pre-Processing Process From Start to Finish.

Receiving, offloading and sorting of waste tyres at the temporary storage area, according to tyre sizes. Waste tyres are offloaded manually/by use of support vehicles, e.g. forklift, depending on size of tyres; stacked and stored according to the requirements of the Waste Tyre Regulations, R. No. 149 of 13 February 2009.

The baling of waste tyres is through mechanised processes. The baling is designed for compaction of rubber car tyres. The machine is placed on a flat base on a 3m x 3m floor space, operating from a 415 Volt 3 phase supply. The material is then deposited in the large capacity loading chamber and then compressed by the twin vertical rams. When enough material exists in the chamber to form a bale, the wire is then secured around the material and a bale material is produced. Bales are then moved from the baling area using a forklift vehicle and baled tyres are stored temporarily stored in the storage area. The material on average is compressed to 1/5 (average) of its original volume.

Finished Products

The bales and other tyres are then removed from site on a daily basis by REDISA registered contracted transporters and delivered to REDISA's approved processing facilities for recycling purposes.

Infrastructure available at the depot include, an office, staff change room and ablution facilities area. The construction still required at the depot is the compacted ground, storm water drainage infrastructure and firefighting equipment as per requirements of the local Fire Department. The depot has a Depot Manager and 8

staff members (admin, finance, and operations).

Please refer to attached process flow diagrams in Appendix H for further details.

Phasha Property Investments therefore commenced with certain activities which were at all relevant times, listed pursuant to section 19, read with section 20, of the National Environmental Management: Waste Act, 2008 (Act No.36 of 2008) (NE: MWA) as activities that require a waste management license (WML) before they may lawfully be undertaken. On the 8th of February, 2016 Limpopo Economic Development, Environment and Tourism (LEDET) undertook a site visit to the site and noted that the facility is bailing waste tyres a listed activity requiring a waste licence under the Waste Act. The facility was advised to rectify the unlawful activities. Please refer to Appendix H for the formal letter from LEDET.

The rectification application concerns the following unlawful activities listed in terms of the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) (NEMWA) is applied for:

- Activity A(2): The sorting, shredding, grinding, crushing, screening or bailing of general waste at a facility that has an operational area in excess of 1000m²
 - *The total operational area of the waste management facility is 10000 m².*
- Activity A (12): The construction of facility for a waste management activity listed in Category A of this Schedule (not is isolation to associated waste management activity).
 - *A waste tyre pre-processing facility and its associated infrastructure has been constructed and is existing on site*
- Activity C (3): The storage of waste tyres in storage areas exceeding 500m²
 - *The Depot also serve as a temporary storage facilities for accumulation of waste tyres collected from tyre dealerships and other collection points around the Limpopo province. The storage capacity is 7800m² and therefore exceeds 500m² at any one time. Waste tyres are received at the facility by labourers by means of support vehicles, offloaded, stacked and temporarily stored according to the requirements of the Waste Tyre Regulations, R. No. 149 of 13 February 2009.*

Please note: Activity C (3) does not require an authorisation (WML). The operator of the facility is required to comply with the Norms and Standards for the Storage of Waste, 2013.

This report is intended to provide the necessary information to the relevant authorities in order to determine the appropriate action to be taken regarding the operation of these activities.

(c) Provide details of all components of the activity and attach diagrams (e.g. architectural drawings or perspectives, engineering drawings, process flow charts etc.).

Buildings	YES X	NO
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Provide brief description:

Infrastructure available at the depot include, an office, staff change room, ablution facilities area. The construction still required at the depot is the staff kitchen, compacted ground, storm water drainage infrastructure and fire breaks in storage areas.

Infrastructure (e.g. roads, power and water supply/ storage) Roads (Available); Water Supply (Available); Power (Available)	YES x	NO -
Provide brief description:		
The depot is connected to Local municipality services and uses water and electricity from Municipality. Existing roads provide access to the depot		
Processing activities (e.g. manufacturing, storage, distribution)	Yes -x	NO
Provide brief description:		
<p>The tyre pre-processing involves the baling of passenger, 4x4 and motorbike tyres through mechanised process. The baling is designed for compaction of rubber car tyres. The material is deposited in the large capacity loading chamber and then compressed by the twin vertical rams. When enough material exists in the chamber to form a bale, the wire is then secured around the material and a bale material is produced. Bales are then moved from the baling area using a forklift vehicle and baled tyres are stored temporarily stored in the storage area. The material on average is compressed to 1/5 (average) of its original volume.</p> <p>The Phasha Property Investments process uses only a series of physical treatment and no chemicals are used in the process. (Please refer to attached flow chart).</p> <p>The Depot also serve as a temporary storage facilities for accumulation of waste tyres collected from tyre dealerships and other collection points around the Limpopo province. The storage capacity is 7800m² and therefore exceeds 500m² at any one time. Waste tyres are received at the facility by labourers by means of support vehicles, offloaded, stacked and temporarily stored according to the requirements of the Waste Tyre Regulations, R. No. 149 of 13 February 2009.</p>		
Storage facilities for raw materials and products (e.g. volume and substances to be stored)		
Provide brief description	Yes x	NO
The Depot also serve as a temporary storage facilities for accumulation of waste tyres collected from tyre dealerships and other collection points around the labourers by means of support vehicles, offloaded, stacked and temporarily stored according to the requirements Limpopo province. The storage capacity is 7800m ² and therefore exceeds 500m ² at any one time. Waste tyres are received at the facility by of the Waste Tyre Regulations, R. No. 149 of 13 February 2009		
Storage and treatment facilities for solid waste and effluent generated by the project	Yes	No x
Provide brief description		
Waste on site is currently collected by a waste Contractor for disposal off site. There is no Waste water and Sanitation are not connected to the Municipality Sewer systems. Waste on site is managed by developer who collects the general waste off site for disposal at a registered landfill site. Whereas sewerage generated is managed by a registered waste service provide who pumps out the chemical toilets once full. The company name is Talisman Sanitation Hire		
Other activities (e.g. water abstraction activities, crop planting activities)	Yes	No x
Provide brief description		
No water is currently extracted from natural watercourses or discharged in water courses		

3. ACTIVITY NEED AND DESIRABILITY

Describe the need and desirability of the activity:
South Africa as a developing country is faced with the ever increasing pile of waste tyres that are hardly used

for any other application. Approximately eleven million tyres are scrapped every year and only six percent are recycled in South Africa (Human, 2006). Unutilized or inappropriate disposal of these substances present a major ecological hazard since they are not biodegradable and disposal is a serious challenge since most landfills do not accept them, as they cannot be compacted and require significant airspace relative to their weight (Mahlangu, 2009). As a consequence, waste tyres litter the countryside and they are often illegally burnt for the generation of heat and recovery of steel for recycling; presenting a health hazard, release of noxious gases into the environment causing atmospheric pollution and leaving environmentally damaging residues in soil (Mahlangu, 2009).

In 2009, the Waste Tyre Regulations, R. No. 149, were promulgated requiring tyre producers and importers to develop integrated industry waste plans that must indicate how waste management measures for waste tyres will be managed and funded (National Waste Management Strategy 2010). The regulation also, requires that Five years of the approval of an Integrated Waste Tyre Management Plan all categories of tyres must be included in the recycling or energy recovery process following the waste hierarchy. REDISA through its integrated industry waste tyre management plan (IIWTMP) supports and promotes tyre recycling, providing the collection and depot infrastructure required to collect waste tyres across the country and deliver them to approved recyclers. Phasha Property Investments, the developer for this development is affiliated to REDISA and is a sub-consultant assisting REDISA to achieve its objectives through the establishment of the proposed waste facility

The National Development Plan is a plan that aims to eliminate poverty and reduce inequality in South Africa by 2030. South Africa can realise these goals by drawing on the energies of its people, growing an inclusive economy, building capabilities, enhancing the capacity of the state, and promoting leadership and partnerships throughout society. The plan identified 13 issues that the country aims to achieve by 2030.

Achieving environmental sustainability and resilience is one of the goals the plan aims to achieve. Waste management is a national issue of concern and the National Development Plan highlights the need to progress towards achieving an absolute reduction in the total volume of waste disposed to landfill. The proposed development is a waste management development that will promote and support the establishment of waste tyre recycling facilities in Limpopo Province. This will reduce the amount of waste tyres going to landfill throughout region. This development is part of REDISA's Integrated Industry Waste Tyre Management Plan (IIWTMP) to establish waste tyre handling facilities across the country and promote and support the establishment of recycling facilities. The overall plan will therefore contribute to the reduction of waste that goes to landfills in South Africa and aid the country to achieve its **environmental sustainability and resilience objective** of the National Development plan for 2030.

According to REDISA's (IIWTMP), the overall nationwide plan for waste tyre recycling will sustainably create 15000 job opportunities across the country. The proposed development is part of this plan and will therefore contribute towards the creation of employment opportunities which also is one of the goals the National Plan 2030 aims to achieve, (eradicate the high unemployment rate in the country): i.e. unemployment rate should fall from 24.9 percent in June 2012 to 14 percent by 2020 and to 6 percent by 2030.

Potential positive social economic impact: The existing waste management facility currently employees 9 permanent employees therefore not only providing income to 9 individuals but 9 households..

In addition, the facility has also indirectly created job opportunities from the establishment of other related small businesses e.g. waste transporters in the Limpopo Province. There are five transporters appointed by REDISA for the collection of waste tyres in the Polokwane area and surrounds. The waste tyre transporters are predominantly from previously disadvantaged communities and employ people from the same communities. This could see recycling becoming a contributor to employment for the informal sector and previously disadvantaged communities in both urban and rural areas. According to REDISA's Integrated Industry Waste Tyre Management Plan (IIWTMP), the overall nationwide plan for waste tyre recycling will sustainably create 15000 job opportunities across the country. The proposed development is part of this plan and will therefore contribute towards the creation of employment opportunities in a country in which unemployment rates are high and in which job creation is encouraged in all spheres of government.

Waste management: The existing depot also ensures on going waste management from recovery and diverting tyres from landfill through recycling and the promotion of treatment and processing technologies in Limpopo Province. Waste tyres are collected from REDISA registered tyre dealers and other collection points. If waste tyres are not collected from the dealers, the dealers will have to stockpile the tyres (which is unlawful) or alternatively dispose of the tyres illegally and possibly in an environmentally sound manner. This may create a significantly worse environmental impact than the continued operation of the Depot would do.

Indicate the benefits that the activity has/had for society in general and also indicate what benefits the activity has/had for the local communities where it is located:

Local and Provincial Level

The proposed Waste Tyre-Pre-processing depot offers a number of tangible benefits to society and local communities as follows:

Waste tyres can create a fire hazard, as well as a breeding site for mosquitoes and vermin, leading to the spread of disease. The existing depot assist in recovery of tyre waste from the environment in turning reducing hazards associated with tyre waste and improving the health and safety of communities. In addition, the waste management facility provides employment to local people within a province with a high rate of unemployment.

While on a national scale the number of job opportunities may seem insignificant, on a local scale this potentially provide job security (and the benefits thereof) not only for employed individuals but for 9 households. The existing depot irrefutably provides an economic stimulus to the local economy through the establishment of other small businesses (waste collectors and transporters), creating additional indirect jobs in both urban and rural areas. There are currently five transporters contracted to REDISA for the collection of tyres, these transporters have also created job opportunities for labourers and drivers from the previously disadvantaged communities, and more households are benefitting from this initiative.

The project will thus in the long run have an overall positive economic impact for the receiving area, will the roll-out of the REDISA project in other areas in the Province, which can be considered to be of high significance

According to Limpopo State of the Environment Report (2006), South Africa's focus on integrated waste management is emphasised by the fact that municipalities now have to prepare an Integrated Waste Management Plan (IWMP) as part of the operational strategies of their Integrated Development Plan (IDP; DPLG, 2001). This requirement brings integrated waste management down to the local level, where it has the greatest potential to make an impact on our society and the environment we live in. Waste management also presents an opportunity to address climate change. The recycling industry for example typically creates new products with a lower use of energy, and hence carbon emissions, than the use of virgin material. Therefore support to the recycling sector is typically a GHG mitigation action.

Limpopo province regards among others the recycling of tyres, and labour intensive waste collection as a waste beneficiation

The existing waste tyre depot also assist the province to reduce the waste that is disposed to licensed waste disposal sites, taking up landfill air space (which is already a problem in the province). The existing depot will aid the Capricorn District, a Limpopo Province District Municipality in achieving its goals in terms of integrated waste management and create a clean environment for its communities.

Following the aforementioned benefits, this means, there is a definite need for the existing depot to communities within the municipality and the province as a whole

4. PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical spatial size of the activity as well as associated infrastructure (footprints):	10 000m ²
Indicate the area that has been transformed / cleared to allow for the activity as well as associated infrastructure	<i>this should be more than 10 000m²</i>
Total area (sum of the footprint area and transformed area)	10 000 m ²

5. SITE ACCESS

Was there an existing access road?	YES x	NO
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If no, what was the distance over which the new access road was built?	N/A	m
Describe the type of access road constructed: [indicate the position of the access road on the site plan]		
No roads have been constructed. The site made use of existing local roads. The R71 gives access to the site		

6. SITE PHOTOGRAPHS

Colour photographs of the site and its surroundings (taken of the site and from the site), both before (if available) and after the activity commenced, with a description of each photograph must be attached to this application. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide past and recent aerial photographs. It should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Photographs must be attached under Appendix D to this form.

7. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

Please list all legislation, policies and/or guidelines that were or are relevant to this activity.

Legislation	Administering Authority	Type Permit/ license/ authorization/comment	Date (if already obtained):
Section 20 of the NEMWA Act, 2008 (ACT 59 OF 2008)	<ul style="list-style-type: none"> ▪ Department for Economic Development, Environment & Tourism 	Waste Licence	
Norms and standards for storage of waste (2013):	<ul style="list-style-type: none"> ▪ Department of Environmental Affairs (DEA) ▪ Limpopo Economic Development, Environment and Tourism (LEDET) 	<p>Norms and standards for storage of waste (2013) specify requirements for storage of waste</p> <ul style="list-style-type: none"> ▪ While no permitting or licensing requirements arise from this legislation, this Act will find application during the construction phase of the project. 	
Environment Conservation Act 1989: Waste Tyre Regulation of 2009	Limpopo Economic Development, Environment and Tourism (LEDET)	While no permitting or licensing requirements arise from this legislation. The facility needs to comply with the requirements of the waste tyre regulation (2009).	
Norms and standards for storage of waste (2013)	Limpopo Economic Development, Environment and Tourism (LEDET)	Norms and standards for storage of waste (2013) specify requirements for storage of waste. The facility needs to comply with the requirements of the norms and standards for storage of waste (2013).	
Occupational Health	Department of Labour	The Occupational Health and Safety	

and Safety Act No. 85 of 1993		Act provides for the health and safety of persons at work and for the health and safety of persons in connection with the use of plant and machinery; the protection of persons other than persons at work, against hazards to health and safety arising out of or in connection with the activities of persons at work.	
POLICY/ GUIDELINES		ADMINISTERING AUTHORITY	
Municipality Town Planning Scheme		Local Municipality	

SECTION C: DESCRIPTION OF RECEIVING ENVIRONMENT

Site/Area Description

For linear activities (pipelines etc) as well as activities that cover very large sites, it may be necessary to complete copies of this Section for each part of the site that has a significantly different environment. In such cases please complete copies of Section C and indicate the area which is covered by each copy No. on the Site Plan.

Section C Copy No. (e.g. 1, 2, or 3):

1. GRADIENT OF THE SITE

Indicate the general gradient of the site(s) (cross out the appropriate box).

Flat x	Flatter than 1:10	1:10 – 1:5	Steeper than 1:5
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2. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site (cross out ("X") the appropriate box (es)).

Ridgeline	Plateau	Side slope of hill/mountain	Closed valley	Open valley	Plain X	Undulating plain/low hills	Dune	Sea-front	Other
-----------	---------	-----------------------------	---------------	-------------	------------	----------------------------	------	-----------	-------

3. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

Is the site(s) located on or near any of the following [cross out ("X") the appropriate boxes]?

Shallow water table (less than 1.5m deep)	YES	NO X	UNSURE
---	-----	------	--------

Seasonally wet soils (often close to water bodies)	YES	NO <input checked="" type="checkbox"/>	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	NO <input checked="" type="checkbox"/>	UNSURE
Dispersive soils (soils that dissolve in water)	YES	NO <input checked="" type="checkbox"/>	UNSURE
Soils with high clay content	YES	NO <input checked="" type="checkbox"/>	UNSURE
Any other unstable soil or geological feature	YES	NO <input checked="" type="checkbox"/>	UNSURE
An area sensitive to erosion	YES	NO <input checked="" type="checkbox"/>	UNSURE
If any of the answers to the above are "YES" or "UNSURE", specialist input may be requested by the Department. Information in respect of the above will often be available at the planning Sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used.			

4. SURFACE WATER

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("") the appropriate boxes)?

Perennial River	YES	NO <input checked="" type="checkbox"/>	UNSURE
Non-Perennial River	YES	NO <input checked="" type="checkbox"/>	UNSURE
Permanent Wetland	YES	NO <input checked="" type="checkbox"/>	UNSURE
Seasonal Wetland	YES	NO <input checked="" type="checkbox"/>	UNSURE
Artificial Wetland	YES	NO <input checked="" type="checkbox"/>	UNSURE
Estuarine / Lagoonal wetland	YES	NO <input checked="" type="checkbox"/>	UNSURE

5. VEGETATION AND GROUNDCOVER

5.1 VEGETATION / GROUNDCOVER (PRE-COMMENCEMENT)

Cross out ("") the block or describe (where required) the vegetation types / groundcover present on the site before commencement of the activity.

Indigenous Vegetation - good condition	Indigenous Vegetation with scattered aliens	<input checked="" type="checkbox"/>	Indigenous Vegetation with heavy alien infestation
Describe the vegetation type above:	Describe the vegetation type above: According to the Vegetation Map the site falls within the Polokwane Plateau Bushveld. This vegetation type can be described as false grassland to open savanna		Describe the vegetation type above:

	characterized by open clumps of woody vegetation with <i>Acacia tortilis</i> subsp. <i>heteracantha</i> and <i>Acacia rehmanniana</i> as the dominant tree element and <i>Themeda triandra</i> dominating the grass layer (Acocks 1953; Low and Rebelo 1996; Mucina & Rutherford 2006).	
Provide ecosystem status for above:	Provide ecosystem status for above:	Provide Ecosystem status for above:
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe
Bare soil	Building or other structure	Sport field
Other (describe below)	Cultivated land	Paved surface

5.2. VEGETATION / GROUNDCOVER (POST-COMMENCEMENT)

Cross out ("X") the block or describe (where required) the vegetation types / groundcover present on the site after commencement of the activity.

Indigenous Vegetation - good condition	Indigenous Vegetation with scattered aliens	Indigenous Vegetation with heavy alien infestation
Describe the vegetation type above:	Describe the vegetation type above:	Describe the vegetation type above:
Provide ecosystem status for above:	Provide ecosystem status for above:	Provide Ecosystem status for above:
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe
Bare soil X	Building or other structure X	Sport field
Other (describe below)	Cultivated land	Paved surface

Please note: The Department may request specialist input/studies depending on the nature of the vegetation type / groundcover and impact(s) of the activity/ies. To assist with the identification of the vegetation type and ecosystem status consult <http://bgis.sanbi.org> or BGIShelp@sanbi.org. Information is also available on compact disc (cd) from the Biodiversity-GIS Unit, Ph (021) 799 8698. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used.

5.3 VEGETATION / GROUNDCOVER MANAGEMENT

Describe any mitigation/management measures that were adopted and the adequacy of these:

N/A. This site is completely transformed with the existing industrial activity on site and is void of vegetation which was cleared during site preparations

6. LAND USE CHARACTER OF SURROUNDING AREA (PRE-COMMENCEMENT)

Cross out ("X") the block that reflects the past land uses and/or prominent features that occur/red within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site.

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area X	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical center	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more) X	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture X	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site

Other land uses (describe):	
--------------------------------	--

7. REGIONAL PLANNING CONTEXT

Is/was the activity permitted in terms of the property's existing land use rights? Please explain

Is/was the activity in line with the following?			
<input type="radio"/> Provincial Spatial Development Framework (PSDF)	YES x	NO	Please explain
<p>The Limpopo Provincial Spatial Development Framework (PSDF) is a provincial and strategic planning policy that responds to and complies with in particular the National Development Plan vision 2030 and the National Spatial Development perspective (NSDP). This framework promotes a developmental state in accordance to the principals of global sustainability as is stated by among others, the South African constitution and enabling legislation. The Limpopo PSDF is based on six growth and development pillars, each of which has its onset of drivers with long term-programmes. Pillar 1 highlights the job creation. The proposed development has created jobs opportunities during its operation phase, these employment opportunities targeted local community members that are usually excluded from mainstream economic and formal employment.</p> <p>According to the Integrated Development Plan 2012/2013-2015, the most pressing problem facing the City of Polokwane today is to create an environment of sustainable economic growth and job creation, which are essential for poverty reduction and improving living conditions. The Municipal area is experiencing environmental problems such as alien species invasion, deforestation, illegal dumping, over grazing soil erosion and natural disasters.</p> <p>Therefore the development is in line with the Limpopo PSDF. Additionally the project will also indirectly create job opportunities from the establishment of other related small businesses e.g. (waste collectors and transporters) and waste tyre recycling facilities in the Limpopo Province This could see recycling becoming a contributor to employment for the informal sector and previously disadvantaged communities in both urban and rural areas</p> <p>The development proposal is in line with the PSDF as the existing and proposed pre-processing facility will contribute towards reducing tyre waste from the environment through recovery and through pre-processing it will initiate recycling thus assisting the province at large with waste deviation from landfills and also the problem of illegal dumping as waste tyres will be collected from the environment where they are currently being dumped illegally. In addition, it will result in the minimization of tyre waste being disposed to landfills.</p>			
<input type="radio"/> Urban edge / Edge of Built Environment for the area	YES	NO x	Please explain

<i>The existing Depot falls outside the Urban Edge</i>			
<input type="radio"/> Integrated Development Plan of the Local Municipality	YES	NO x	Please explain
The study area falls within the Polokwane Municipality Capricorn District and. Waste Management among other municipal services is highlighted in the 2014/-2015 IDP as priority issues warranting attention. The project will not compromise the IDP objectives but would rather assist the Local Municipality in achieving these targets as the facility will ensure on going waste management not only in the local area but the province as a whole. Additionally the facility has created job opportunities not only to the facility but also indirectly via waste collector, transporters and other service providers associated with the facility. Thus increased employment and skills transfer is aligned with the Municipalities Development Plans			
<input type="radio"/> Spatial Development Framework of the Local Municipality	YES	NO	Please explain
The site is zoned agriculture and rezoning or consent use approval will be required from the relevant authority. However it has been established that the Municipality will exempt any activities such as the proposed that operate along the road verges to operate without change in land use. Confirmation has been requested to be sourced from the Municipality as none was on file at the time of compilation of this application. Once obtained it will be furnished to the Department			
<input type="radio"/> Approved Structure Plan of the Municipality	YES	NO x	Please explain
Structure Plans will require approval from the Building/Property Department from the Local Municipality			
<input type="radio"/> Any other Plans	YES	NO	Please explain
Unknown			

8 SOCIO-ECONOMIC CONTEXT

8.1 SOCIO-ECONOMIC CONTEXT (PRE-COMMENCEMENT)

Describe the pre-commencement social and economic characteristics of the community in order to provide baseline information.

The existing depot has created jobs opportunities during the construction phase and operation phase, these employment opportunities targeted local community members that are usually excluded from mainstream economic and formal employment. Additionally the project will also indirectly create job opportunities from the establishment of other related small businesses e.g. (waste collectors, security guards and transporters) and waste tyre recycling facilities in the broader Limpopo Province This could see recycling becoming a contributor to employment for the informal sector and previously disadvantaged communities in both urban and rural areas

Phasha Property Investment operates a pre-processing facility in Polokwane and allows for the local community to benefit from recycling their waste tyres. There are no immediate communities in the vicinity of the activity.

8.2 SOCIO-ECONOMIC CONTEXT (POST-COMMENCEMENT)

Describe the post commencement social and economic characteristics of the community in order to determine any change.

The pre-processing facility enables communities to obtain income through the collection of waste tyres from the environment and thus prevent it from polluting the environment. The existing facility supports and promotes tyre recycling, providing the collection and depot infrastructure required to collect waste tyres across the province and deliver them to REDISA approved recyclers. In turn reducing waste tyres from the environment. The waste tyre facility has thus facilitated the establishment of other related small business such as waste tyre collectors, transporters and recycling facilities. This will also result in the creation of indirect job opportunities in the region resulting in a economic multiplier effects from the use of local contractors and establishment of related businesses. The benefits therefore to the community and region at large are significant.

CULTURAL/HISTORICAL FEATURES

Were there any signs or evidence (unearthed during construction) of culturally or historically significant elements including archaeological or palaeontological sites, on or in close proximity to the site?		YES	NO x
		UNCERTAIN	
If YES, explain:			
If uncertain, the Department may request that specialist input be provided to establish whether such possibilities occurred on or close to the site.			
Briefly explain the findings of the specialist if one was already appointed:			

Were any buildings or structures older than 60 years affected in any way?	YES	NO x
Was it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	YES	NO x
If yes, please submit or, make sure that the applicant or a specialist submit the necessary application to SAHRA or the relevant provincial heritage agency and attach proof thereof to this application.		

SECTION D: PRELIMINARY IMPACT ASSESSMENT

Please note, the impacts identified below refer to general impacts commonly associated with development activities. The list below is not exhaustive and may need to be supplemented. Where required, please append the information on any additional impacts to this application.

1. WASTE, EFFLUENT AND EMISSION MANAGEMENT

(a) Solid waste management

Did/does the activity produce any general waste (e.g. domestic-, commercial-, certain industrial waste, including building rubble also known as solid waste) during the construction phase and/or the operational phase?	YES x	NO
If yes, briefly describe what type of waste was produced (i.e. green waste, building rubble, etc.) in which phase.		
No waste was significantly generated during construction apart from cleared vegetation and domestic waste. The waste was taken to the registered landfill and where required it was reused. During operation only minimal waste such as domestic waste and sewage waste is generated on site. In summary, all waste generated from the facility is fed into the municipal system. No waste is generated from the baling of the tyres, all tyres received at the depot are taken offsite to recycling facilities for further processing		
What quantity was/is produced during the construction period?	N/A Facility is already built	m ³
What was/is the estimated quantity that will be produced per month during the operational phase?	Could not be determined	m ³
Did/does the activity produce any hazardous waste (e.g. chemical, medical waste, infectious, nuclear etc.) during the construction and/or the operational phase?	YES	NO x
If yes, briefly describe what type of waste was produced (i.e. infectious waste, medical waste, etc.) in which phase.		
N/A		
What quantity was/is produced during the construction period?	N/A	m ³
What was/is the estimated quantity that will be produced per month during the operational phase?	N/A	m ³
Where and how was/is waste treated / disposed of (describe each waste stream)?		

N/A		
Has the municipality or relevant authority confirmed that sufficient capacity exist for treating / disposing of the solid waste to be generated by this activity(ies)? If yes, provide written confirmation from municipality or relevant authority	YES	NO
Does/did the activity produce solid waste that was/will be treated and/or disposed of at another facility other than into a municipal waste stream?	YES	NO X
If yes, did/has this facility confirmed that sufficient capacity exist for treating / disposing of the solid waste to be generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:	YES	NO
Did/does the facility have an operating license? (If yes, please attach a copy of the license.)	YES	NO
Facility name:		
Contact person:		
Postal address:		
	Postal code:	
Telephone:	Cell:	
E-mail:	Fax:	

(b) Effluent

Did/does the activity produce sewage and or any other effluent?	YES X	NO
The facility does not produce any effluent apart from the minimal normal sewage waste that is generated on site from the operation crew. Sewage is managed and handled/ managed through the use of portable chemical ablutions facilities. A registered service provider provides the chemical toilets which are then pumped out by the same provider when full for disposal in a municipal sewage system or treatment facility.		
What was/is the estimated quantity produced per month?	Unknown m ³	
Was/is the effluent treated and/or disposed of in a municipal system?	Could not be determined at this stage	
If Yes, did/has the Municipality or relevant authority confirmed that sufficient unallocated capacity exist for treating / disposing of the sewage or any other effluent generated by this activity(ies)? Provide written confirmation from the Municipality or relevant authority.		
N/A		
Was/is any effluent produced be treated and/or disposed of on site?	YES	NO X
If yes, briefly describe the nature of the effluent and how it was/will be disposed of:		
Did/does the activity produce effluent that was/will be treated and/or disposed of at another facility?	YES	NO X
If yes, did/has this facility confirmed that sufficient capacity exist(ed) for treating / disposing of the liquid effluent generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:	YES	NO
Does the facility have an operating license? (If yes, please attach a copy of the license.)	YES	NO

Facility name:	
Contact person:	
Postal address:	
	Postal code:
Telephone:	Cell:
E-mail:	Fax:

Describe the measures that was/will be taken to ensure the optimal reuse or recycling of waste water, if any:

Not Applicable- No wastewater is generated on site

(c) Emissions into the atmosphere

Did/does the activity produce emissions that will be disposed of into the atmosphere?	YES	NO <input checked="" type="checkbox"/>
If yes, did/does it require approval in terms of relevant legislation? If yes, attach a copy to this application	YES	NO <input checked="" type="checkbox"/>
Describe the emissions in terms of type and concentration and how it was/will be treated/mitigated:		
Not Applicable the facility does not release an emissions to air This development is a temporary waste storage and pre-processing facility and does not therefore not release any toxic pollutants to the environment other than exhaust emissions and dust generated during operation, which will be limited only to working hours 7:30am-4:30pm. In addition the site requires paving and therefore this impact will be completely negated in the long run		

(d) Describe any mitigation/management measures that were adopted and the adequacy of these:

Dust suppression measures are implemented during dry weather conditions

2. WATER USE

(a) Please indicate the source(s) of water for the activity by crossing out ("X") the appropriate box(es)

Municipal Only water for dust suppression and drinking and ablution facilities is required.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Water Board	Groundwater	River, Stream, Dam or Lake	Other	The activity did/does not use water

If water was/is extracted from a groundwater source, river, stream, dam, lake or any other natural feature, please indicate the volume that was/is extracted per month:

N/A m³

Please provide proof of assurance of water supply eg. letter of confirmation from Municipality/water user associations, yield of borehole etc.

Did/does the activity require a water use permit / license from DWAF? If yes, attach a copy to this application	YES	NO <input checked="" type="checkbox"/>
---	-----	--

If yes, please submit the necessary application to Department of Water Affairs and Forestry and attach proof thereof to this application.

(b) Describe any mitigation/management measures that were adopted and the adequacy of these:

Not Applicable

3. POWER SUPPLY

(a) Please indicate the source of power supply eg. Municipality / Eskom / Renewable energy source.

Eskom

Has the Municipality or relevant service provider confirmed that sufficient electricity capacity (i.e. generation, supply and transmission) exist for activity(ies)?

If yes, provide written confirmation from Municipality or relevant service provider.

See attached statement from Eskom within Appendix E

YES
x

NO

If power supply was/is not available, where was/is it sourced from?

(b) Describe any mitigation/management measures that were adopted and the adequacy of these:

4. ENERGY EFFICIENCY

(a) Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:

The use of heavy electrical machinery or diesel powered machinery in the operation of the development has been avoided and/or minimised, thus minimizing electricity required for this facility. All operations are undertaken during daylight hours (i.e. between 7:30am and 4:30pm) reducing the need for lighting. Where lighting is required, energy efficient lighting will be used as far as practical.

(b) Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:

Energy efficient lighting will be used where practical

5. NOISE IMPACTS

(a) Did/does the activity result in any noise impacts?

YES

NO x

If yes, please describe and indicate the measures implemented to mitigate and manage these impacts?

--

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential noise impact(s) of the activity/ies.

6. VISUAL IMPACTS

(a) Did/does the activity result in any visual impacts?	YES	NO <input checked="" type="checkbox"/>
If yes, please describe and indicate the measures implemented to mitigate and manage these impacts?		
(b) Did/does the activity result in potential lighting impacts at night?	YES	NO <input checked="" type="checkbox"/>
If yes, please describe and indicate the measures implemented to mitigate and manage these impacts?		
(c) Were/are there any alternatives available to address this impact?	YES	NO <input checked="" type="checkbox"/>
If yes, please describe these alternatives?		

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential visual impact(s) of the activity/ies.

7. SOCIO-ECONOMIC IMPLICATIONS OF THE ACTIVITY

(a) What was/is the expected capital value of the activity on completion?	R
(b) What was/is the expected yearly income or contribution to the economy that will be generated by or as a result of the activity?	R1512000
(c) Did/does the activity contribute to service infrastructure?	YES NO
(d) How many permanent new employment opportunities were created?	9
(e) What was/is the expected current value of the employment opportunities to date?	R 50000
(f) What percentage of this accrued to previously disadvantaged individuals?	100%

How was (is) this (to be) ensured and monitored (please explain):
Phasha Property Investments will monitor this through its Human Resources Department

8. PRELIMINARY IMPACT ASSESSMENT

Briefly describe the impacts (as appropriate), significance rating of impacts and significance rating of impacts after mitigation. This must include an assessment of the significance of all impacts. Please note: This is a preliminary impact statement. The Department may request specialist input/studies depending on the type and nature of the impact(s) of the activity/ies.

Possible Impacts	Significance rating of impacts after mitigation (Low, Medium, Medium-High, High, Very High):
Soil Contamination	Low (negative)
Fire Hazard	Medium (negative)
Air Pollution	Low (negative)
Social Positive Impacts	Low (positive)
Visual impacts due to improper waste handling, storage and inappropriate housekeeping	Very Low (negative)
Health and safety hazards of workers on site.	Low (negative)
Soil Erosion	Low (negative)
Ensuring on going waste management in Polokwane and broader region	Low- Medium (positive)

Please note Impact assessment table attached as **Appendix F**

SECTION E: ALTERNATIVES

As part of this report, consideration must be given to alternatives that are/may have been possible had an environmental impact assessment been undertaken prior to the commencement of the activity. Please provide a detailed description of the alternatives (whether location, technology or environmental) that were/are possible in terms of this application.

Feasibility studies were undertaken to determine what would be the best alternative to this development.

Environmental considerations

- The site was selected to ensure minimal impact on the environment
- Minimal expropriation is required;
- No major structures are required.

Site Alternatives

- No site alternatives have been investigated for the existing facility of vacant land in the area (the Waste Tyre Pre-processing Depot). The reasons for not investigating alternatives are as follows:
- The site is conveniently located, therefore the establishment of the pre-processing facility will reduce transportation cost and the developer's carbon footprint required to transport waste tyres from storage facilities to pre-processing facilities in the region.
- There is sufficient space within the existing footprint of the site to accommodate the waste management facility
- There are no sensitive environments on the proposed site, e.g. no stream is recorded within 1km radius from the edge of the development and it is also not located in an area deemed important or of conservation value. No heritage issues occur on site. The land was previously used for agriculture.
- Land availability. - The land in question where the development is currently taking place belongs to the developer and therefore no land acquisitions or negotiations will be required and subsequently this was the most suitable site to conduct the activity.
- Site access to the site is directly off the existing R71 towards Tzaneen an existing gravel road is available to take traffic down to the proposed site. The site is therefore appropriately located for the existing facility. The site is therefore appropriately located for easy transport of waste tyres to and from the site.

The activity is therefore considered to be acceptable for this location. No other reasonable or feasible alternatives exist.

Facility Layout Alternatives

- Site layout alternatives permit consideration of different spatial configuration of an activity on a particular site. This may include particular components of a proposed development or may include the entire activity. E.g. siting of a particular structure either to screen from view to minimize aesthetic impacts or site of a structure to avoid impacts of a wetland that may exist on site. This is not applicable as no sensitivities occur on site to avoid.

Technology Alternative

- The technology used for baling of tyres is very highly specialized and very limited technology exists for this kind of development. Therefore no technology alternatives were considered.

SECTION F: APPENDICES

The following appendices must be attached where appropriate:

Appendix	Cross out ("X") the box if Appendix is attached
Appendix A: Location map	X
Appendix B: Site plan(s)	X
Appendix C: Owner(s) consent(s)	X
Appendix D: Photographs	X
Appendix E: Permit(s) / license(s) from any other organ of state including service letters from the municipality	X
Appendix F: Additional Impact Assessment Information	X
Appendix G: Report on alternatives	
Appendix H: Any Other (describe)	X- Vegetation Map and Aerial Map of Study Area, Process Flow Chart and Letter of site visitation by LEDET

SECTION G: DECLARATIONS

G1: Declarations of the EAP

1. The Independent Environmental Assessment Practitioner

I, K. Golenda declare under oath that I –

- a. act as the independent environmental assessment practitioner in this application ;
- b. do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the S24G of the National Environmental Management Act, read together with the relevant Environmental Impact Assessment Regulations;
- c. do not have and will not have a vested interest in the proposed activity proceeding;
- d. have no, and will not engage in, conflicting interests in the undertaking of the activity;
- e. undertake to disclose, to the competent authority, any material information that has or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the S24G of the National Environmental Management Act, read together with the Environmental Impact Assessment Regulations, 2006;
- f. will ensure that all documents will contain all relevant facts in respect of the application & that all documentation is distributed or made available to interested and affected parties. I will ensure that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced for the rectification application.
- g. will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;
- h. will keep a register of all interested and affected parties that participated in a public participation process; and
- i. will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.

Signature of the environmental assessment practitioner:

[Handwritten signature]

Envirovolution Consulting

Name of company:

29/06/16

Date:

[Handwritten signature]

Signature of the Commissioner of Oaths:

2016-06-29

Date:

WARRANT OFFICER

Designation:

Official stamp (below)



G2: Declarations of the Applicant

2. **The Applicant**

I, MABOGALE OSCAR PHASHA

- a. am the applicant in this application;
- b. appointed the environmental assessment practitioner as indicated under G1 above to act as the independent environmental assessment practitioner for this application;
- c. will provide the environmental assessment practitioner and the competent authority with access to all information at my disposal that is relevant to the application;
- d. am responsible for complying with the directive or conditions of any environmental authorisation issued by the competent authority;
- e. understand that I will be required to pay an administration fine in terms of S24G(2) of the Act and that a decision in this regard will only be forthcoming after payment of such a fine; and
- f. hereby indemnify, the government of the Republic, the competent authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible in terms of the Act.



Signature of the applicant:

Phasha Property Investments CC

Name of company:

Date:

20 JUNE 2016

Signature of the Commissioner of Oaths:

Date:

Branch Manager

Designation:

Official stamp (below):

Verify that the deponent has acknowledged that he/she knows and understands the contents of this statement/declaration. This statement/declaration was sworn before me and the deponent's fingerprints were placed thereon in my presence.

Signature: [Signature]

Full Names and Surname: Shere Phasha

Rank: Branch Manager

S.A. POST OFFICE LTD.
BRANCH MANAGER

2016-06-20

UNA PARK 0787

FFICE LTD.

Appendix A1: Locality Map





Molemole

Polokwane

Site

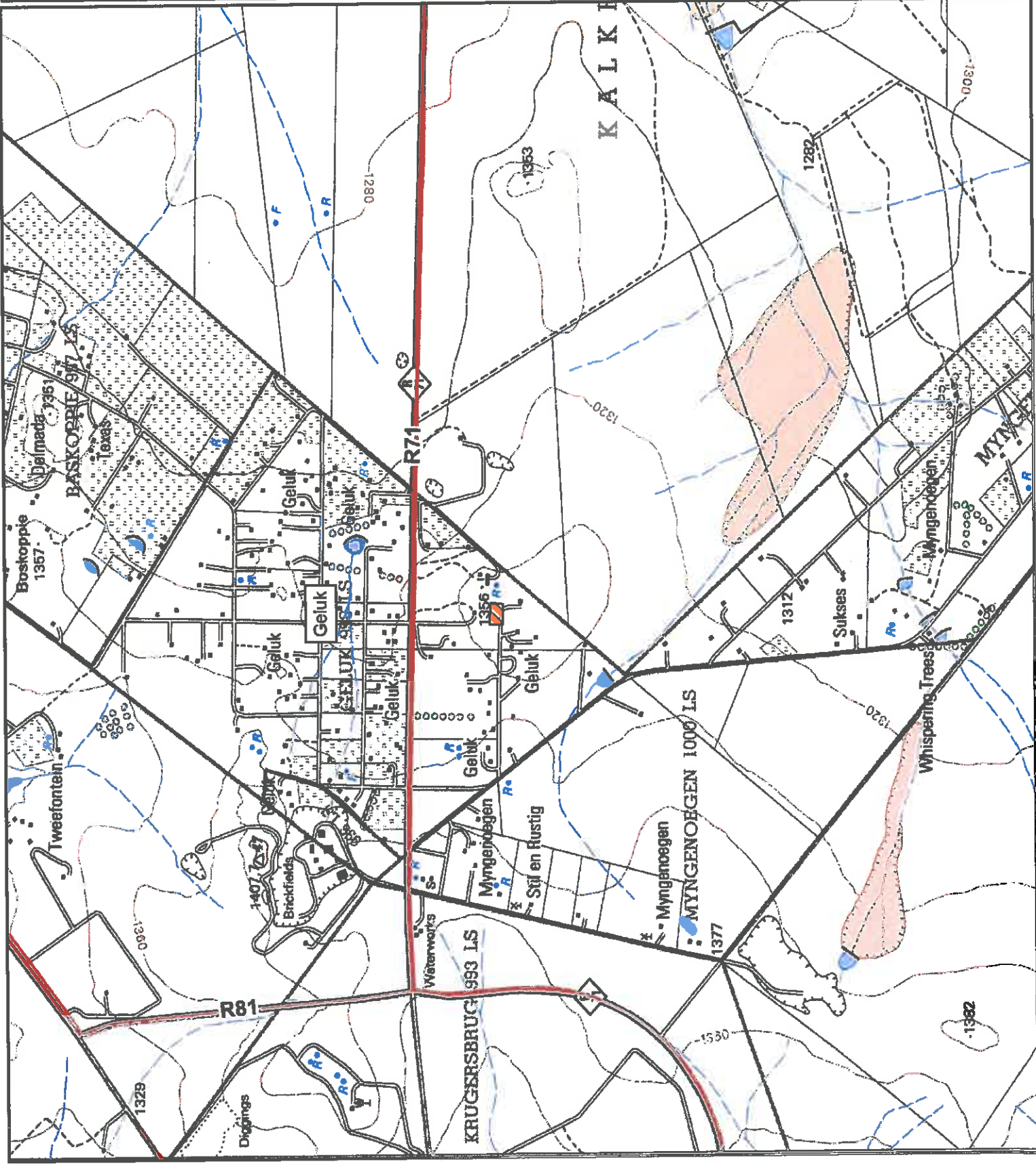
POLOKWANE DEPOT LOCALITY MAP

Legend

-  National Route
-  Arterial Route
-  Main Road
-  Site



1:35 000



Appendix B:

Site Plans

REDISA – Polokwane Depot

5 metres - Fire Buffer

Main Gate

Bales - 3 Stack High
Bales - 3 Stack High

Bales - 3 Stack High
Bales - 3 Stack High

Bales - 3 Stack High
Bales - 3 Stack High

Bales - 3 Stack High
Bales - 3 Stack High

Security

Trolley unit
50kg Dep

Offloading Zone

Bailing Shed
Future Bailing Shed - Extension

Office

Trucks Tyres
20m (L) x 10m (W) x 3m (H)

Trucks Tyres
20m (L) x 10m (W) x 3m (H)

Trucks Tyres
20m (L) x 10m (W) x 3m (H)

Trucks Tyres
20m (L) x 10m (W) x 3m (H)

Trucks Tyres
20m (L) x 10m (W) x 3m (H)

Trucks Tyres
20m (L) x 10m (W) x 3m (H)

5 metres - Fire Buffer

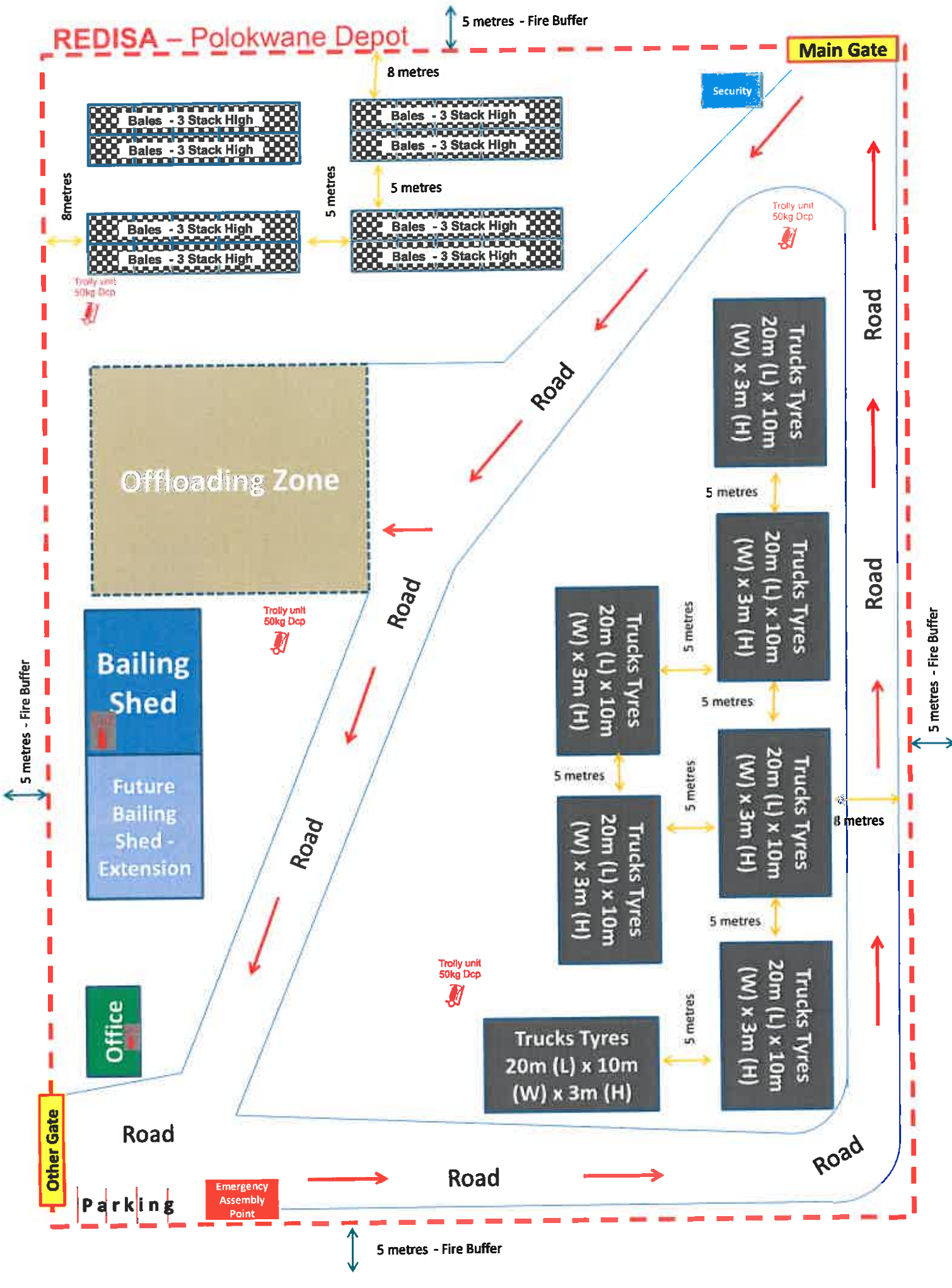
5 metres - Fire Buffer

Other Gate

Parking

Emergency Assembly Point

5 metres - Fire Buffer



Appendix C:
Owner(s) consent(s)



PHASHA PROPERTY INVESTMENTS CC

REG: 91/17266/25

Tel: 015 291 3839. Fax: 015 291 4986. Address: No.7 Jorissen Str, Polokwane, Limpopo Province, South Africa
P.O Box 1, Lebokwagomo, 0737

20 June 2016

Attention: TM Mphalele

Re: A Confirmation of Land Ownership

Dear Madam/Sir,

LANDOWNER CONSENT FORM

I, Mabogale Oscar Phasha confirm that Phasha Property Investment CC is the lawful owner of the property Plot 10 Geluk where the existing Polokwane Waste Tyre Pre-Processing Depot is located. Phasha Property Investment CC is also the applicant.

In accordance with regulation 39 of the National Environmental Management Act 1998, Phasha Property Investment CC is exempted from giving written consent.

This letter serves to also confirm that as the representative of Phasha Property Investment CC, I am aware of the section 24G rectification process that is being undertaken by Envirolution Consulting for the facility. I am further aware of my right to participate in the public participation process.






Please do not hesitate to contact me by telephone on (015) 291 3839 or by email at info@recycle.mplh.co.za, should you need further information.




Mr Oscar Phasha
Depot Manager:
Tel: (015) 291 3839

Appendix D: Site Photographs

THE S24G APPLICATION FOR RECTIFICATION FOR POLOKWANE WASTE TYRE PRE-PROCESSING DEPOT
SITE PHOTOGRAPHS

June 2016

			
<p>North West</p>	<p>Northern direction of the site</p>	<p>Viewed from the north east of the site</p>	
 <p>Centre of site</p>			

<p>Western direction of the site</p>  <p>South west direction</p>	<p>Centre of site</p>  <p>Overview of the southern portion bordered by a white fencing</p>	<p>Eastern direction of site (where access point is)</p>  <p>South West view of the site</p>
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Eight Directional Photograph



Figure 1 and 2: View to the bailer and additional machinery used on site



Figure 3 and 4: Storage of tyres prior to bailing and transportation to recyclers



Figure 5: The majority (95%) of the site is exposed bare grounds with only paved surface were bailing is housed.



Figure 6: Fencing on site



Figure 7: Haulage truck used to deliver tyres to site and from site



Figure 8: Already existing access road to site



Figure 8 and 9: Entry and Exit point to Depot with security



Figure 10: Overview of vegetation in the immediate environment (occurring in the East and northern boundaries of the site)



Figure 11: Overview of the land cover within the project area

Appendix E:
**Permit(s) / license(s) from any
other organ of state including
service letters from the
municipality**

Appendix F:
Additional Impact Assessment
Information

Table 1: Environmental Impact Assessment – Polokwane Waste Tyre Pre-Processing Depot

Impact on:	Criteria			Description	Significance (Without mitigation)	Significance (With mitigation)	Status
	Extent	Duration	Intensity				
Geology & Soils	Local	Short term	Medium	Possible	Alteration of the geology through excavation activities associated with engineering of the site to meet legislative requirements Low	Low	Negative
Soil and Water	Local	Medium	Medium	Possible	Fuel tanks are subject to spillage, leakage and overflows. Any hazardous substances (e.g. diesel, oil) used during processing could potentially result in soil and water contamination unless good management practices are adhered to Medium	Low	Negative
Impacts on Biodiversity e.g. (Flora, Fauna and watercourses)	Local	Short term	Medium	Possible	There are no biodiversity sensitive features e.g. (sensitive conservation-worthy indigenous natural vegetation or aquatic ecosystems) present on site and its immediate surrounding environment. Impacts on flora and fauna that may occur on site is low. Low	Low	Neutral
Air Quality	Local	Long term	Low	Possible	Dust emissions: Approximately 95% of the depot is bare exposed ground. Dust emissions from wind erosion and movement of vehicles will occur. Appropriate dust suppression measures to address dust must be implemented during windy conditions. Medium	Low	Neutral
Ensuing on going waste management	Local	Long term	Medium	Definite	The proposed development will ensure on going waste management and diversion of waste tyres from landfill through waste recovery and recycling in the Limpopo Province Medium	Medium	Positive
Visual	Local	Long term	Medium	Probable	The depot is not expected to pose any significant visual impacts considering the industrial nature of the location. Visual impacts from improper storage (e.g. vertical piling up) of waste tyres and untidiness of the site may result in visual impacts to the nearest homesteads Low	Low	Neutral
Noise	Local	Long term	Low	Possible	Very minimal noise maybe generated by haulage trucks that access site to homesteads in close proximity to the site Low	Negligible	Neutral
Socio Economic	Local	Long term	High	Definite	The existing facility has created employment opportunities for the local people and also indirectly through service providers and other businesses such as transporters and recycling facilities related to the business Low ++	Low ++++	Positive

Pollution	Local	Short term	Medium	Improbable	Pollutants through incidental spillages and leakage of hazardous material could impact on underground and surrounding water sources if incorrectly managed	Low	Low	Negative
Storm water	Local	Long term	Medium	Definite	Potential ground and surface water contamination arising from pooling of storm water on site as whole tyres tend to collect water in their cavities and cause pooling	High	Medium	Neutral
Roads & Traffic	Local	Short term	Low	Probable	Construction traffic may impact on access roads leading to the site. The probability of occurrence of accidents and spillages will be increased with the frequent transportation of hazardous materials	Low	Low	Neutral
Fire and hazard risks	Local	Long term	Low	Probable	Negligence on the part of the workers might result in fires. The design of the site should include fire breaks in the storage area as per the waste tyre Regulations. Including emergency services access in case of an accidental fire	High	Medium	Negative
Public Health, Safety and Security	Local	Long term	Medium	Probable	The transportation of tyres to and from site can result in public safety of other road users if drivers do not adhere to road safety rules. The developer will comply with requirements of OHSA in order to reduce exposure risks of workers and the public.	Low	Negligible	Negative

The key impacts relate to geology & soils, soil and water, topography & drainage, flora and fauna, air quality, public health & safety , visual, noise, socio economic , pollution, stormwater and heritage. The majority of the impacts have a low significance, provided they can be effectively mitigated.

APPENDIX H-1
Vegetation Map

Mofemole

Polokwane

Site

POLOKWANE DEPOT TERRESTRIAL CBA

Legend

National Route

Arterial Route

Main Road

Site

Critical Biodiversity Area 1

Critical Biodiversity Area 2

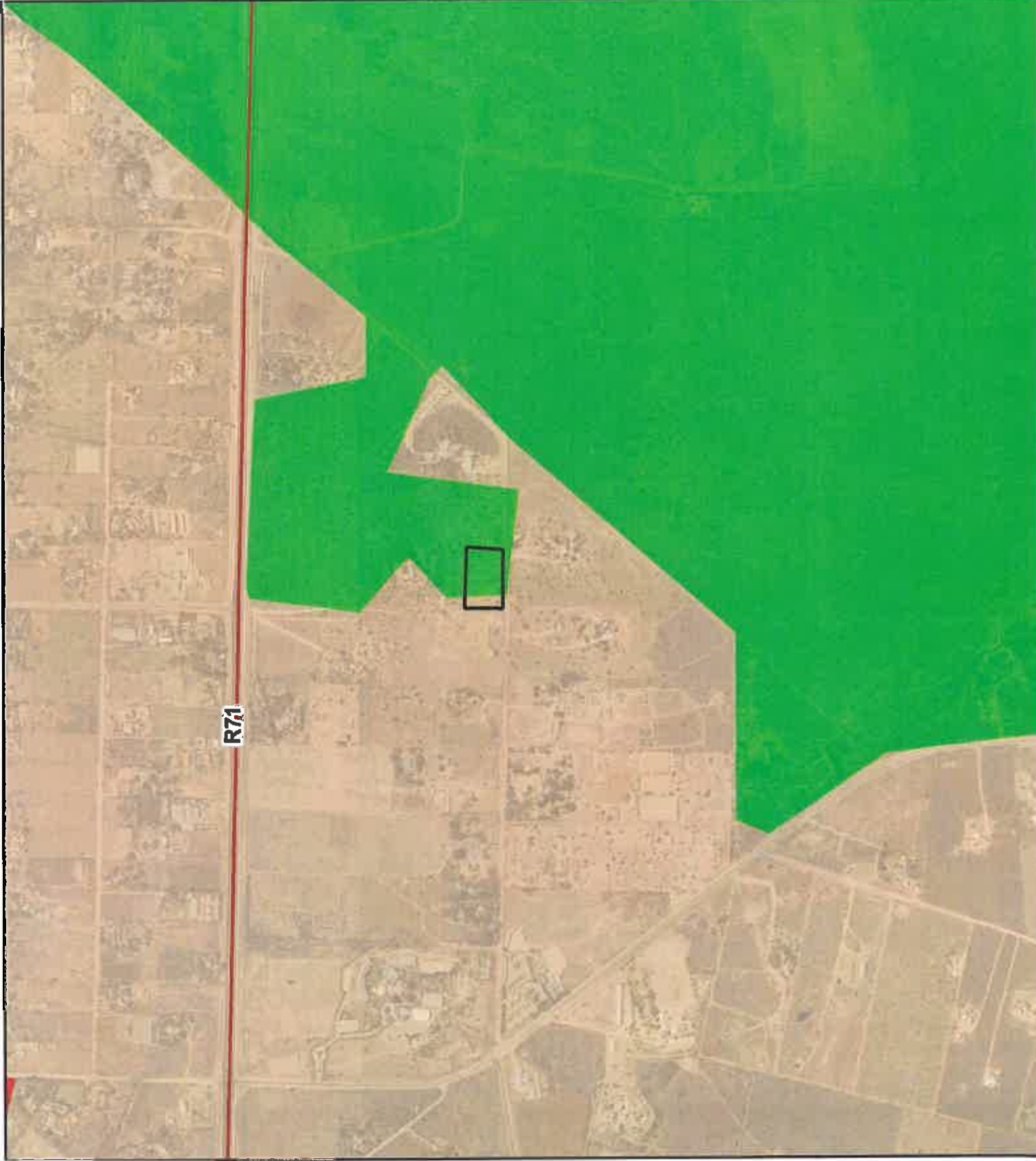
Ecological Support Area 1

Ecological Support Area 2

No Natural Remaining

Other Natural Area

Protected Area



APPENDIX H-2
Aerial Map of study area and its immediate surroundings



Polokwane Depot

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© 2016 Google
Image © 2016 CNES / Airbus

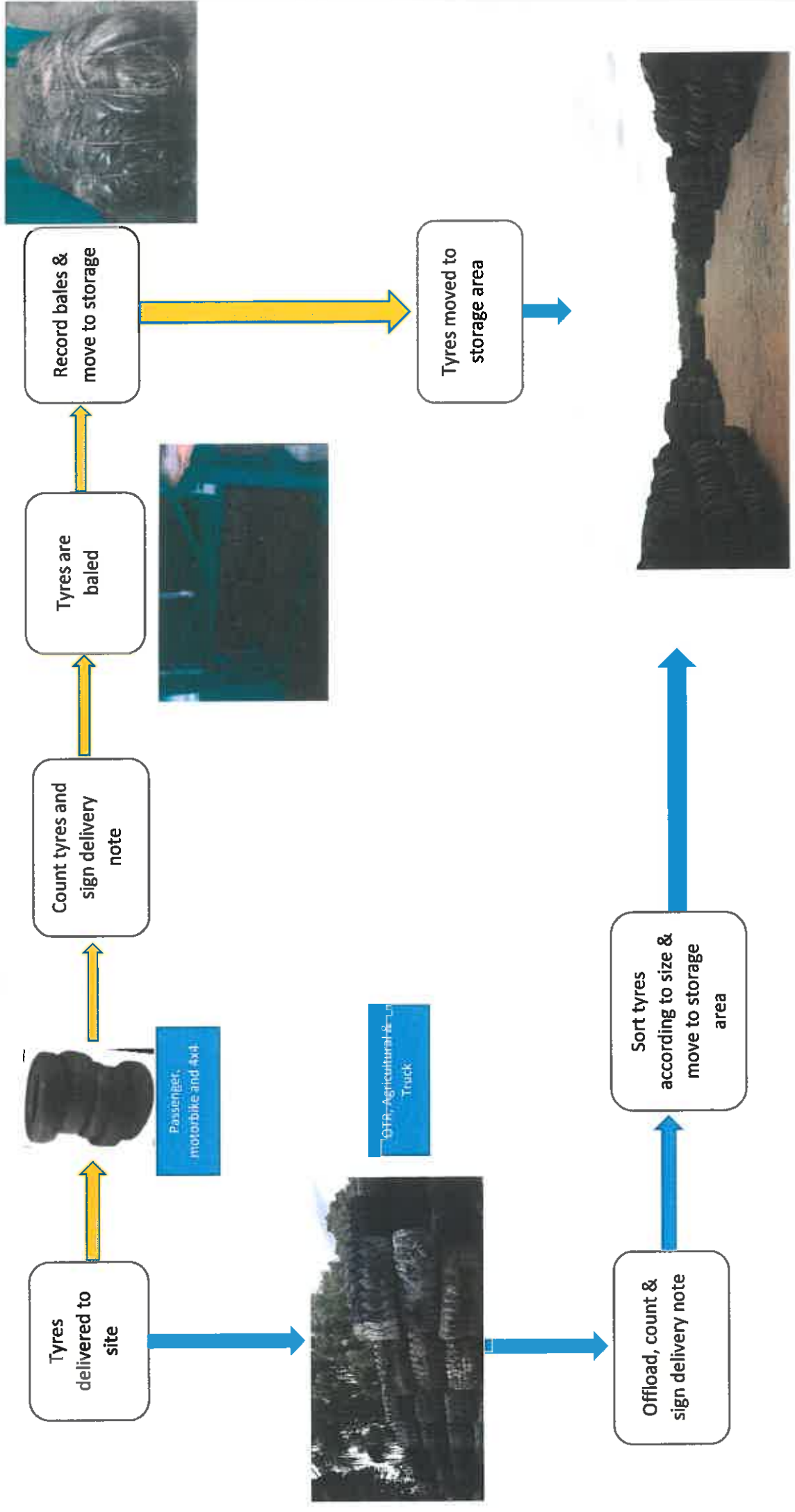
2001

Google

Imagery Date: 3/31/2016 23°54'19.37" S 29°32'00.94" E elev 1352 m eye alt

APPENDIX H-3
Process Flow Chart

OPERATIONAL AND PROCESS ILLUSTRATION: POLOKWANE PRE-PROCESSING DEPOT



APPENDIX H-4
Letter of site Inspection by LEDET



LIMPOPO

PROVINCIAL GOVERNMENT
REPUBLIC OF SOUTH AFRICA

DEPARTMENT OF
ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM

Enq: Maesela LB
Tel: 015 290 7098
Fax: 015 295 4836
Cell: 079 527 1818
Email: MaeselaLB@ledet.gov.za

Ref: 12/4/9/8/13 - 1

The Managing Director
Phasha Property and Investments
PO Box 5627
POLOKWANE NORTH
0750

Attention: Mr O Phasha

REPORT ON THE ENVIRONMENTAL PERFORMANCE OF REDISA POLOKWANE DEPOT WITHIN POLOKWANE LOCAL MUNICIPALITY.

In fulfilment of the responsibilities assigned to provincial environment departments in the Constitution, 1996 (Act 108 of 1996), the National Environmental Management Act, 107 (Act 107 of 1998) and National Environment Management: Waste Act No. 59 of 2008, (60-64), as amended with regard to the environment, pollution control and waste management, this office has instituted a programme of regular inspections at waste management facilities in the province.

On the 08th February 2016 a site inspection conducted at REDISA Polokwane Depot by this office revealed number of environmental findings as outlined in the attached inspection report.

It would be appreciated if you could take the necessary action/s and keep us informed of further developments in this regard within thirty (30) working days from the date of signature of this report.

Should you have any queries, please do not hesitate to contact this office.

Yours faithfully


MPHAHLELE TM

DIRECTOR: INTEGRATED POLLUTION AND WASTE MANAGEMENT

DATE: 01/03/2016

Cc: Polokwane Local Municipality Attention: Mr P Tjikana Email: PhineasT@polokwane.gov.za



LIMPOPO

PROVINCIAL GOVERNMENT
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Ref: 12/4/9/8/13 - 1

REPORT ON THE ENVIRONMENTAL PERFORMANCE OF RECYCLING AND ECONOMIC DEVELOPMENT INITIATIVE OF SOUTH AFRICA POLOKWANE DEPOT WITHIN POLOKWANE LOCAL MUNICIPALITY.

On the 08th February 2016 a site inspection was conducted at REDISA Polokwane by Ms L Maesela and Mr P Mabothe accompanied by Mr O from Phasha Property and Investments.

The objectives of the inspection were as follows:

1. To give support to Phasha Property and Investments with regards to applicable legislations, guidelines and norms and standards that the Depot ought to comply with.
2. Site appraisal in order to make recommendations for improving its performance and
3. To gather information for use in the provincial waste management planning as well as implementation of Section 60 through 64 of National Environmental Management: Waste Act, 2008 (Act No 59 of 2008) as amended on Waste Information System.

All aspects of the facility were evaluated, including, its legal status (whether licensed or not), access control, infrastructure, the communities it service, spillages, odor, safety and health as well as monitoring and record keeping.

The following environmental findings were observed:

1. LEGAL COMPLIANCE

The Facility is neither authorised nor licensed in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) as amended.

2. OWNERSHIP AND OPERATION

- 2.1 The site is operated by Phasha Property and Investments on behalf of REDISA.
- 2.2 The site is on a 1 Hectar Plot of Farm Geluk outside Polokwane which is owned by Phasha Property and Investments. The total storage area size of the facility is 3200 square metres.
- 2.3 The site started to operate in December 2014.
- 2.4 The site operates Monday to Friday from 07:30 to 16:30.

Corner Suid & Dorp Street, Polokwane, 0699, Private Bag X 9484, Polokwane, 0700
(Switchboard) Tel: +2715 290 7000 Website: www.ledet.gov.za

- 2.5 There is an incomplete notice board written in one official language (English) displayed at the entrance to the site.
- 2.6 An operational plan is not available on site.
- 2.7 Waste tyre is screened according to size and stored on a bare ground.
- 2.8 There is a mobile bailing machine which is used to bale waste tyre before being transported for further processing.
- 2.9 Quantities of waste disposed of and reclaimed are not recorded and kept on site.

3. ACCESS

- 3.1 The site is fenced with a 1.2 metres wire fence and has a lockable gate.
- 3.2 Road signage illustrating the route to the site is provided along the main road leading to the site.
- 3.3 Access is controlled through the provision of a security guard.

4. INFRASTRUCTURE (STRUCTURES AND BUILDINGS)

- 4.1 There is a provision of guard house and a mobile office within the site.
- 4.2 There is no weighbridge at the entrance of the site to record quantities of waste tyre entering the site; however it was indicated that incoming and outgoing records are known by REDISA who controls such in their head offices through an electronic system.
- 4.3 There is provision of an off-loading area and a steel structure sorting bay for bailing of waste tyre.

5. RECOMMENDATIONS

- 5.1 This office wishes to indicate that no person may commence, undertake or conduct a listed waste management activity unless a license is issued in respect of that activity. You are therefore advised to apply for a waste management license with the Department as required for in terms of Section 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) as amended.
- 5.2 A notice board written in at least two applicable languages familiar to the surrounding community showing full details of the owner, address, responsible person, telephone numbers, operational hours and types of recyclables accepted should be installed on the site.
- 5.3 A standard operation plan and operating procedures must be developed and made available at the site to guide on day to day operation of the site.
- 5.3 Quantities of waste disposed of and reclaimed should be recorded and kept on site.


MAESEL L

ENVIRONMENTAL OFFICER: PRODUCTION - GENERAL WASTE MANAGEMENT

DATE: 18/02/2016