



GAUTENG PROVINCE
AGRICULTURE AND RURAL DEVELOPMENT
REPUBLIC OF SOUTH AFRICA

FAX COVER

TO:	FROM:
Colleen McCreadie	Erick Moletsane
COMPANY:	DATE:
Colleen McCreadie, The Environmental Practice	2021
EMAIL:	TOTAL NO. OF PAGES, INCLUDING COVER:
colleen@enviroprac.co.za	5
CELL:	CC:
012 788 9323	
RE:	YOUR REFERENCE NUMBER:
Comments on The Draft Environmental Scoping Report: For the Proposed Get Alloys Scrap Aluminium Foundry on Remainder Of Portion 1 Of The Farm Driefontein No. 87-IR, Germiston, Ekurhuleni Metropolitan Municipality	Gaut 002/21-22/10002

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY



GAUTENG PROVINCE
AGRICULTURE AND RURAL DEVELOPMENT
REPUBLIC OF SOUTH AFRICA

Reference: GAUT 002/21-22/10002
Enquiries: Erick Moletsane
Tel: +27 (0)11 240 3390
Erick.Moletsane@gauteng.gov.za

Colleen McCreadie, The Environmental Practice

23 Dartmouth Road

Muizenberg

7945

Email: colleen@enviroprac.co.za

Dear Mr./Ms. Colleen McCreadie,

COMMENTS ON THE DRAFT ENVIRONMENTAL SCOPING REPORT: FOR THE PROPOSED GET ALLOYS SCRAP ALUMINIUM FOUNDRY ON REMAINDER OF PORTION 1 OF THE FARM DRIEFONTEIN NO. 87-IR, GERMISTON, EKURHULENI METROPOLITAN MUNICIPALITY

Regarding the above-mentioned draft basic assessment report received by the Department on 24 November 2021, herewith receive the comments from the Department.

1. Description of the site/property/route and development

The development entails the development of a foundry to produce Aluminum Alloy and Copper from scrap

- 1.1 The site measures $\pm 0,86$ hectares in extent
- 1.2 Development footprint is $\pm 0,86$ hectares in extent.
- 1.3 The installation of infrastructure needed for the foundry will include furnaces and other machinery to produce 2000 tons of aluminum alloy per month.
- 1.4 Other activities will include upgrading the buildings on site as well as constructing new buildings.
- 1.5 A second phase will include installing furnaces for the melting of scrap brass and copper to produce 100 tons of copper per month.

2. Applicable legislation and policies

The report has made provisions to accommodate applicable legislations. The activity entails the development of a foundry which has an impact in terms of the Constitution of the Republic of South Africa Act, 1996 (Act No. 108 of 1996), National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended), National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004), National Environmental Management Waste Act, 2008 (Act No. 59 of 2008), Occupational Health and Safety Act, 1993 (Act No. 85 of 1993). The Gauteng Provincial Environmental Management Framework, 2015 identifies the proposed site as Environmental Management Zone 1 which is conditionally compatible with the surrounding land uses.

3. Description of the receiving environment

The proposed development is located within Critical Threatened Ecosystem identified as Klipriver Highveld Grasslands.

4. Listed activities applied for

The following listed activities have been applied for-

Activity No and description	Description of the development related to the listed activity
<p>GN R. 325/ Listing Notice 2 activity 6: "The development of facilities or infrastructure for any process or activity which requires a permit or license or an amended permit or license in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent, excluding- Activities which are included in the list of waste management activities...in which case the NEM: Waste Act ,2008 applies.</p>	<ul style="list-style-type: none"> The development of a foundry and associated infrastructure.
<p>GN No. 921 of 2013 as amended (WASTE MANAGEMENT ACTIVITY) Category A, Activity 5</p>	<ul style="list-style-type: none"> The foundry will entail the recovery of Aluminum and copper from scrap aluminum and copper, at a rate of about 88 tons per day.
<p>GN No. 921 of 2013, as amended (WASTE MANAGEMENT ACTIVITY) Category A, Activity 12</p>	<ul style="list-style-type: none"> The establishment of the foundry will entail the installation of equipment and infrastructure specific to the foundry, as well as renovations of the existing buildings on site.

5. Specialist studies

The proposed site is located within a Dolomite; therefore, a Dolomite Feasibility Investigation to avoid or curb the risk of sink holes and a Geotechnical Study must be undertaken by the suitable qualified specialist and form part of the Draft Environmental Assessment Report.

Furthermore, the following specialist studies must also be undertaken, and they must be attached in the Environmental Impact Assessment Report:

- 5.1 Air Quality Impact Assessment
- 5.2 Heritage Impact Assessment
- 5.3 Pollution Prevention Measures must be investigated.

6. Services required

In terms of engineering services water supply, storm water management, electricity supply, sewerage reticulation, the facility will use the existing municipal services and the existing site access points from Shaft Road.

7. Impacts Identification, Assessment and Mitigation

The assessment of impacts included in the draft report indicates that the impacts rating after mitigation is low to medium and the mitigation measures will be put in place.

8. Assessment of alternatives

The following alternatives were assessed, and they must still be attached in the Draft Environmental Impact Assessment:

- 8.1 Activity Alternatives
- 8.2 Site Alternatives
- 8.3 Process Alternatives
- 8.4 Technology Alternatives
- 8.5 "No-Go" Alternative

9. Need and desirability of the development

The need and desirability of the development outlined in the report is noted and it must form part of the Draft Environmental Assessment Report.

10. Maps, layout plans, services route positioning

A locality map overlain to the site sensitivities has been attached and it must still be attached in the Draft Environmental Impact Assessment. Furthermore, a facility illustration has been attached and it must still be attached in the Draft EIR.

11. Public Participation Process

It is noted that the draft report has been circulated for comments. Any further comments and responses from key stakeholders including proof of consultation, written notice, site notice, and newspaper advertisement must be attached in appropriate appendices in the Draft Environmental Impact Assessment report

12. other aspects to be considered

- A Provisional Atmospheric Emission License must be obtained prior to the commencement of the proposed activities.
- A Waste Management License must be obtained prior to the commencement of activities.
- The plan of study attached in the report must be implemented and findings must be presented in the Environmental Impact Assessment Report.
- Dust Control measures and Nuisance dust particles measures must be put in place and they must form part of the Environmental Management Programme.
- Spillages/leakages of Dross must be put in place to minimise the negative impacts that may emanate from them and they must form part of the Environmental Management Programme.

13. Environmental Management Programme (EMPr)

A Specific Environmental Management Programme (EMPr) for the proposed foundry must be compiled and attached in the Draft EIAR.

If you have any queries regarding the contents of this letter, please contact the official of the Department using any of the above indicated contact details.

Yours faithfully,



Mr. Erick Moletsane
CEO - Grade B: Impact Management

Date: 21/12/2021