Chubby Chick Enterprises

Rendering Facility WMLA – Final Environmental Impact Assessment Report Locality: Potchefstroom Departmental Ref No: 12/9/11/L1392/7 Date: 31 May 2016





FINAL ENVIRONMENTAL IMPACT ASSESSMENT REPORT

Chubby Chick Enterprises

Rendering Facility WMLA – Final

Environmental Impact Assessment

Report

Locality: Potchefstroom Departmental Ref No: 12/9/11/L1392/7 Date: 31 May 2016

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PROJECT DETAILS

National Department of Environmental Affairs

Reference No.: 12/9/11/L1392/7

Project Title: Chubby Chick Rendering Facility

Project Number: FOU-POT-12-05-02

Compiled by: Lizette Crous

Date: 31 May 2016

Location: Pretoria

Technical Reviewer: Jan Nel

Jan Nel



EXECUTIVE SUMMARY

The Applicant

Cycle City (Chubby Chick Enterprises) is a poultry production company based in Potchefstroom. The company owns various chicken raising farms, both traditional broiler farms and free-range farms, in the Potchefstroom area and slaughters the chickens at their own abattoirs in Potchefstroom.

Background description

A common challenge in the poultry industry is how to dispose of poultry waste, such as mortalities from the chicken farms or blood produced in the slaughtering process. A responsible and economically viable option is to process the poultry waste into a poultry by-product meal at a rendering facility. The meal can then be used as an additive in the production of animal feeds, such as cattle feed.

Project description

The Chubby Chick rendering facility has been operational since 1997 and has a Sterilisation License in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947). The facility does, however, not have a Waste Management License for current and planned waste management activities. A separate application for a Water Use License will also be submitted to the relevant authority and a provisional Atmospheric Emission License has been issued for the rendering facility by the North West Department of Rural, Environmental and Agricultural Development.

Legal requirements and legislative process

As part of the operation of the rendering facility, listed waste management activities defined under the National Environmental Management: Waste Act, Act 59 of 2008 (NEMWA) and the regulations there under take place. Relevant listed activities triggered by the current and proposed activities at the rendering facility are described further in this final Environmental Impact Assessment Report (EIR) (refer to Part 1.5).

It is the intention of this EIR to provide the necessary information pertaining to the proposed activities associated with the project, as required in terms of the Environmental Impact Assessment Regulations (EIA Regulations R543: EIA Regulations in terms of Chapter 5 of the NEMA, 1998, dated June 2010) under the NEMA, 1998, and NEM:WA, 2008. This EIR intends to highlight all information relevant to the rendering facility project.

The diagram below provides a visual representation of the Scoping- and EIA approach followed in terms of NEMWA, 2008, NEMA, 1998, and the Environmental Impact Assessment Regulations, dated 2010.

Schedule	Process	Public Participation and Stakeholder
		Consultation
Application submission: 7 November 2013 PPP: 23/01/2014 – 03/03/2014	 Application Phase: Waste Management License Application form Background Information 	 Submission of Application form and obtaining Project reference number from DEA I&APs & Stakeholder register / database Background Information Document distributed, newspaper advertisement and site notices placed Telephonic and electronic notifications I&APs and Stakeholder comments recorded
PPP review of the draft Scoping Report: 27/05/2014 - 14/07/2014 (DWA – 04/08/2014)	 Scoping Phase: Draft Scoping Report and Plan of Study for EIA Submission of Final Scoping Report and Plan of Study for EIA 	 Letters to inform I&APs and Stakeholders of the availability of the draft Scoping Report Draft Scoping Report for public and Stakeholder comment (available on www.shangoni.co.za) Consultation with local authorities Incorporation of comments and issues into Scoping Report Final Scoping Report submission to DEA
PPP review of draft EIR 8/09/2015 – 19/10/2015 (8/09/2015 – 9/11/2015 for DWS) PPP review of revised EIR 16/03/2016 – 29/04/2016 (16/03/2016 – 20/06/2016 for DWS)	 EIA Phase: Specialist Studies Impact Assessment and Mitigation measures Draft EIA Report Final EIA Report Current Process 	 Letters to inform I&APs and Stakeholders of the availability of the draft EIA Report Draft EIA Report for public and Stakeholder comment (available on www.shangoni.co.za) Continued consultation with local authorities and communication to I&APs Incorporation of comments and issues into final EIA Report Final EIA Report submission to DEA
	Final Phase: Authorities' decision- making stage 	 Notify I&APs and Stakeholders of government authority's decision on the application for a Waste Management License Available on www.shangoni.co.za

Environmental impacts associated with the project

The purpose of this document is to supply the National Department of Environmental Affairs with the requested information pertaining to the National Environmental Management: Waste Act (NEM:WA), the National Environmental Management Act (NEMA), as amended, and Regulation 28 of the Environmental Impact Assessment Regulations, dated 2010. Contained in this document is a detailed investigation of the activity and potential site-specific impacts associated with the operation of the Chubby Chick rendering facility and the following proposed changes to the facility:

- The installation of a wastewater collection tank for the temporary storage of wastewater prior to its removal offsite for disposal;
- The installation of a sewage collection tank for the temporary storage of sewage prior to its removal offsite for disposal; and
- The rehabilitation of the existing earth evaporations dam and wastewater trenches.

The treatment works that was planned for the treatment of the wastewater generated at the rendering facility and the lining of the existing earth evaporation dam and wastewater trenches is no longer required. This is due to improvements that are being implemented at the abattoirs that supply waste (feathers, blood, etc.) to the rendering facility. The improvements specifically entail the installation of feather presses. The feather presses will reduce the moisture content of the abattoir waste that is taken to the rendering facility, thereby decreasing the volume of wastewater generated at the rendering facility during the rendering process. This reduction in volume has removed the need for a wastewater treatment works and the installation of a holding tank for the wastewater is more feasible, prior to the wastewater being taken offsite for disposal at the municipal sewage treatment works. Sewage from the rendering facility will be contained in a separate collection system (conservancy tank) and will also be taken offsite for disposal at the municipal sewage treatment works.

This application for environmental authorisation of the above mentioned activities entails conducting a full Scoping and Environmental Impact Assessment process. During the Environmental Scoping Report (ESR) phase and Environmental Impact Report (EIR) phase, the baseline potential impacts related to the operation of the rendering facility and its proposed upgrades were identified.

Regulation 31 (of Regulation 543) of the EIA Regulations, 2010, under the NEMA, 1998, requires that an Environmental Impact Report (EIR) includes an assessment of the status; extent; duration; probability; reversibility; replaceability of resources; and mitigatory potential of the major potential environmental impacts of the rendering facility and its proposed upgrades. Refer to Part 7 of this report for a detailed risk assessment.

Potential significant impacts that have been identified during the scoping and environmental impact assessment process have been listed below for the planning and design phase, the construction phase, the operational phase and the rehabilitation phase of the proposed project. Closure and decommissioning of the rendering facility is not anticipated for the foreseeable future. Should the facility

close, a detailed closure and rehabilitation plan will be submitted to the National Department of Environmental Affairs prior to decommissioning.

Planning and Design Phase

- Soil, surface water and groundwater pollution during the operational phase due to inadequate design of the wastewater collection tank;
- Soil, surface water and groundwater pollution, as well as nuisance caused by odours and unsightly appearance of waste onsite, due to inadequate design of waste storage facilities and/or areas;
- Degradation and loss of a valuable resource (topsoil) through increased runoff as stormwater flows over cleared, bare areas during rainfall events, due to poor scheduling of construction activities;
- Generation of noise and nuisance to neighbours as a result of construction activities occurring during inconvenient times of the day; and
- Generation of atmospheric emissions, odours and nuisance to neighbours during the operational phase, due to inadequate design of the air treatment system (odour abatement system).

Construction Phase

- Harm to the environment in general (this can include pollution of soil and water resources, as well as harm to employees and wasteful practices in terms of resource use and waste management);
- Removal of indigenous vegetation during the construction phase;
- Disturbance or destruction of vegetation surrounding the site as a result of runaway veld fires caused by workers or contractors;
- Introduction of alien invasive plants that can impact on the hydrology and outcompete natural vegetation. Alien and invasive plant species also generally use more water than indigenous plants;
- The construction activities associated with the proposed new wastewater collection tank may disturb or destroy areas of the wetlands onsite;
- Degradation and loss of a valuable resource (topsoil);
- Erosion of cleared areas;
- Soil and surface water pollution as a result of the spillage, improper handling, storage, mixing or disposal of cement and concrete;
- Soil and surface water pollution through contaminated wash water runoff;
- Soil, surface water and groundwater pollution due to poor waste management as well as nuisance caused by odours and unsightly appearance of waste onsite;
- Soil, surface water and groundwater pollution from unsanitary conditions onsite;
- Soil, surface water and groundwater pollution as a result of poor management and accidental spills of hazardous chemical substances used onsite;
- Hydrocarbon pollution of soil, surface water and groundwater through the spilling of fuel, grease or oil or leaking equipment and vehicles;
- Ambient air quality degradation as well as disturbance and nuisance to neighbours and other sensitive receptors due to dust generation;
- Noise pollution and nuisance to neighbours;

- Wear of access roads, accidents on access roads, unpermitted transport of materials and loss of materials being transported on access roads;
- Wastage or depletion of a valuable resource (groundwater) due to inefficient or redundant usage;
- Loss of artefacts or sites protected by the National Heritage Resources Act, 1999 (Act No. 25 of 1999).

Operational Phase

- Harm to the environment in general (this includes pollution of soil and water resources, as well as harm to employees and wasteful practices in terms of resource use and waste management);
- Growth of alien and invasive vegetation leading to smaller habitat areas available for indigenous vegetation. Alien and invasive plant species also generally use more water than indigenous plants;
- Loss of indigenous grassland and habitats for indigenous fauna species surrounding the site as a result of runaway veld fires;
- The potential release of wastewater or affected stormwater into the environment can lead to further degradation of the hillside seep wetland;
- Soil, surface water and groundwater pollution as well as nuisance caused by odours and unsightly appearance of waste onsite as a result of poor waste management (waste generated at the facility and not including incoming waste from the abattoirs for processing at the rendering facility);
- Soil, surface water and groundwater pollution as well as nuisance caused by odours and unsightly appearance of waste onsite as a result of poor management of incoming waste from the abattoirs (waste to be processed at the rendering facility);
- Soil, surface water and groundwater pollution from unsanitary conditions onsite;
- Soil, surface water and groundwater pollution as a result of poor management and accidental spillage of hazardous chemical substances used onsite;
- Soil, surface water and groundwater pollution through spillage of fuel, grease or oil and leaking equipment and vehicles;
- Soil, surface water and groundwater pollution due to the inadequate containment of wastewater in the wastewater collection tank and sewage in the conservancy tank;
- Soil, surface water and groundwater pollution due to poor handling and storage of coal;
- Soil, surface and groundwater pollution as a result of poor ash management;
- Soil and surface water pollution due to the contamination of 'clean' stormwater in 'dirty' areas;
- Ambient air quality degradation as well as disturbance and nuisance to neighbours and other sensitive receptors due to dust generated from onsite traffic;
- Noise disturbance and nuisance to neighbours and other sensitive receptors due to operational activities;
- Disturbance and nuisance to neighbours and other sensitive receptors due to offensive odours generated at the rendering facility;
- Ambient air quality degradation through combustion emissions from boilers;

- Wear of access roads, accidents on access roads, unpermitted transport of materials and loss of materials being transported on access roads;
- Wastage or depletion of valuable resources (groundwater and electricity) due to inefficient or redundant usage;
- Outbreak of diseases and possible infection of workers at the facility; and
- Loss of artefacts or sites protected by the National Heritage Resources Act, 1999 (Act No. 25 of 1999).

Rehabilitation Phase

- Ineffective rehabilitation, including soil erosion and generation of dust; and
- Bare areas leading to soil erosion and generation of dust as a result of ineffective establishment and growth of vegetation planted during rehabilitation of disturbed areas.

Decommissioning and Closure Phase

Closure and decommissioning of the rendering facility is not anticipated for the foreseeable future. Should the facility close, a detailed closure and rehabilitation plan will be submitted to the National Department of Environmental Affairs prior to decommissioning.

The table below summarises the impacts that have been identified and evaluated for the rendering facility and its proposed upgrades.

Potential Impact			Environmental Significance Pre Mitigation			Environmental Significance Post Mitigation		
	P ¹	M ²	S ³	Р	М	S		
General Environment		1	1		1			
The following impacts can be expected if proper environmental management plans are not developed and implemented:								
Soil-, surface water- and groundwater pollution;								
Generation of noise and subsequent nuisance to nearby landowners;								
Generation of atmospheric emissions, dust and odours and subsequent nuisance to nearby landowners;								
Loss or disturbance of vegetation;	3	3	М	2	2	L		
Loss of topsoil;								
Soil erosion;								
Disturbance of a wetland; and								
Contamination of surface water runoff.								
Harm to the environment in general (this includes pollution of soil and water resources, as well as harm to employees and		3	М	2	2			
wasteful practices in terms of resource use and waste management).								
Fauna and Flora (Critical Biodiversity Area 2)	<u> </u>	1		1	1			
Removal and destruction of indigenous vegetation outside of the construction footprint for the wastewater collection tank.	3	1	L	2	1	L		
Loss of indigenous grassland and habitats for indigenous fauna species surrounding the site as a result of runaway veld fires.		3	М	1	3	L		
Bare areas leading to soil erosion and generation of dust. Ineffective rehabilitation of the existing earth evaporation dam and		2	М	2	1			
trenches will result in these areas remaining in a disturbed state.			.01	-		_		
The disturbance due to construction and earth works will create a window of opportunity for invasions by alien invasive plants.		3	м	2	2			
Invasion of alien plants can impact on the hydrology and outcompete natural vegetation.			IVI	2				

Table 1: A summary of the impacts associated with the operation of the Chubby Chick rendering facility and its proposed upgrades.

¹ Probability
 ² Magnitude
 ³ Severity

Potential Impact	Enviro	nmental Sig Pre Mitigat		Environmental Significance Post Mitigation P M S		
	P ¹	M ²	S ³			
Sensitive areas - Wetland						
The construction activities associated with the proposed new wastewater collection tank may disturb or destroy areas of the						
wetland. The construction activities may change the amount of sediment entering the water resource and result in changes to	3	3	М	2	2	L
turbidity. The construction activities may change the physical structure within the water resource (habitat).						
The leakage of wastewater into the environment can lead to further degradation of the hillside seep wetland. The wetland is in a largely modified state.	3	3	М	1	3	L
Topsoil		1		1	1	
Degradation and loss of a valuable resource (topsoil) through increased runoff as stormwater flows over cleared, bare areas during rainfall events.	3	3	М	2	1	L
Degradation and loss of a valuable resource (topsoil) due to prolonged exposure.	3	2	M	1	2	L
Erosion of cleared areas.	3	2	M	2	2	L
Ineffective rehabilitation causing soil erosion and the generation of dust.	3	3	М	2	2	L
Soil, surface water, stormwater and groundwater pollution		1		1	1	
Soil, surface water and groundwater pollution during the operational phase due to inadequate design of the wastewater collection tank.	3	4	н	1	2	L
Soil and surface water pollution due to the incorrect management of cement and concrete.	3	4	Н	2	3	М
Soil and surface water pollution due to the release of contaminated wash water into the environment.	3	4	Н	2	3	М
Soil, surface water and groundwater pollution from irresponsible waste management practices. Nuisance caused by odours and unsightly appearance of waste onsite.	3	3	М	2	2	L
Soil, surface water and groundwater pollution as a result of unsanitary conditions onsite.	3	3	М	2	2	L
Soil, surface water and groundwater pollution. Toxic contaminants such as metal ions (e.g. copper, lead and zinc) and hydrocarbons can detrimentally impact upon the water quality of the area.	4	3	н	2	3	М
Soil, surface water and groundwater pollution from waste generated at the rendering facility. Nuisance caused by odours and unsightly appearance of waste onsite.	3	4	н	2	2	L
Soil, surface water and groundwater pollution from incoming waste from the abattoirs and chicken farms. Nuisance caused by odours and unsightly appearance of waste onsite.	3	4	н	2	2	L

Potential Impact		nmental Sig Pre Mitigat		Environmental Significance Post Mitigation		
	P ¹	M ²	S ³	Р	М	S
Soil, surface water and groundwater pollution due to the inadequate containment of wastewater in the wastewater collection	3	4	н	1	3	L
tank and sewage in the conservancy tank.	5	4	н	1	5	L
Soil, surface water and groundwater pollution due to the incorrect management of coal.	3	2	М	2	2	L
Coal ash contains heavy metals and metalloids such as, Pb and Se. These contaminants can leach into groundwater						
discharging at discharge zones into spruits and rivers. Deterioration of surface water quality within the adjacent wetland area	5	1	н	2	4	М
and downstream water resources may take place as a result of affected surface water runoff generated at the coal ash storage	5	4	н	2	4	IVI
area.						
Soil and surface water pollution due to the contamination of clean stormwater runoff.	4	3	Н	2	2	L
Atmosphere and Noise	<u> </u>	1			1	
Generation of noise and nuisance to neighbours as a result of construction activities occurring during inconvenient times of the	3	3	М	2	2	1
day. Noise disturbance and nuisance to neighbours and other sensitive receptors due to operational activities.	3	5	IVI	2	2	L
Ambient air quality degradation as well as disturbance and nuisance to neighbours and other sensitive receptors due to dust	4	2	М	2	2	L
generated from onsite traffic.		2	IVI	2	2	L
Disturbance and nuisance to neighbours and other sensitive receptors due to offensive odours generated by the rendering		4	н	3	3	М
facility.	5	4		5	5	IVI
Ambient air quality degradation though combustion emissions from the coal-fired boilers.	5	4	Н	5	3	Н
Infrastructure	<u> </u>	1			1	
Wear of access roads, accidents on access roads, unpermitted transport of materials and loss of materials being transported	4	2	М	2	2	L
on access roads.	4	2	IVI	2	2	L
Resource usage	<u> </u>	1			1	
Wastage or depletion of a valuable resources (groundwater and electricity) due to inefficient or redundant usage.	3	3	М	2	1	L
Hygiene						
Outbreak of diseases and possible infection of workers at the facility.	3	3	М	2	2	L
Heritage						
Loss of artefacts or sites protected by the National Heritage Resources Act, 1999 (Act No. 25 of 1999).	3	3	М	3	2	М

Appropriate mitigation measures will assist in minimising the potential impacts on the surrounding environment during the construction and operational phases of the proposed project. A draft Environmental Management Programme (EMP) has also been compiled, with the aim of serving as a working document in order to manage and/or mitigate the identified potential impacts. Refer to Appendix F for a copy of the draft EMP.

The main mitigation measures that should be applied to the proposed project include the following:

- Environmental Awareness Training for all contractors and workers;
- A complaints register must be kept on site to record and deal with complaints from people in the vicinity of the site;
- Before any construction takes place the proposed area for the proposed new wastewater collection tank will be pegged out. All construction activities will be limited to within these areas in order to reduce the footprint disturbed and avoid impact on the wetland;
- The wastewater collection tank must be designed to effectively contain the wastewater from the rendering facility until such time as it can be removed offsite for disposal;
- The wastewater collection tank must be designed to contain the required volume of wastewater, taking expected/planned removal frequencies into consideration;
- Soil, stormwater and groundwater pollution must be prevented through the correct handling, storage and disposal of cement, concrete, waste and chemicals;
- A Water Use Licence must be obtained for all water use activities occurring onsite;
- Adequate firefighting equipment must be available on site;
- The conditions of the rendering facility's Atmospheric Emission Licence must be adhered to;
- Implement the recommendations of the Odour Management Plan;
- All recommendations in the Stormwater Management Plan must be implemented;
- Implement the Water Monitoring Programme;
- If any sites, features or objects are found during site clearance, all activities must cease and a heritage expert must be contacted to investigate the site;
- The provisions of the National Norms and Standards for the Storage of Waste must be implemented, where required;
- Regular site inspection by supervisors;
- Process incoming waste in a timely manner;
- Schedule activities that will generate the most noise during times of the day that will result in least disturbance to neighbours;
- Undertake regular geohydrological studies to determine the impact of the rendering facility on the groundwater resource;
- The coal ash must be disposed of or managed in accordance with its waste classification; and
- Implementation of effective and sustainable rehabilitation and remediation practices.

Based on the outcomes of the Environmental Impact Assessment, conducted as part of this full Scoping and Environmental Impact Assessment process, as well as the alternatives assessment, the following recommendations are made:

- The proposed project/activity (the upgrading and licensing of the rendering facility as well as the construction of the new wastewater collection tank) should be authorised and allowed to proceed on the preferred site (26°47'16.80"S; 27°08'58.39"E);
- 2. The mitigation measures proposed in this report and the draft Environmental Management Programme must be implemented during all phases of the proposed project;
- 3. It is assumed that the wastewater collection tank will operate as designed and will effectively contain all rendering facility wastewater prior to its removal offsite for disposal;
- 4. It is assumed that the wastewater volumes generated at the rendering facility will not exceed the design capacities of the wastewater collection tank;
- It is assumed that the mitigation measures proposed in this report and the draft Environmental Management Programme will be correctly implemented by the applicant and that they will be effective;
- 6. A communications pathway must be established that would allow the designated ECO to accept and deal with stakeholder complaints;
- 7. Proposed mitigation measures should be incorporated as far as possible into the operational plan for the rendering facility; and
- 8. Strict monitoring and enforcement of requirements of the EMP must be undertaken to ensure that contractors and operators adhere to these requirements.

- 0

TABLE OF CONTENTS

EXE	ECUTIVE SUMMARY4
LIS	T OF FIGURES
LIS	T OF TABLES
LIS	T OF APPENDICES
REF	ERENCES
DEF	INITIONS
ABE	3REVIATIONS25
1.	INTRODUCTION
	Process followed
1.2	Details of the project applicant
1.3	Appointed Environmental Assessment Practitioner
1.4	Current situation
1.5	Proposed activities
2.	NATURE AND EXTENT OF THE ENVIRONMENT AFFECTED BY ACTIVITY49
	Geology
2.2	Regional climate
	Topography55
	Soils
	Land use and land capability
2.6	Vegetation
2.7	Animal life63
2.8	Surface water
2.9	Groundwater
2.10)Wastewater72
2.11	Water Use Licensing75
2.12	Sensitive landscapes76
2.13	Sites of archaeological and cultural interest79
2.14	Air Quality
2.15	Visual aspects
2.16	Socio-economic aspects

3.	APPLICABLE LEGISLATION AND GUIDELINES
4.	PUBLIC PARTICIPATION PROCESS
4.1	Objectives of the Public Participation Process (PPP)92
4.2	Legislation and guidelines followed for the PPP93
4.3	Public Participation Process followed93
5.	NEED AND DESIRABILITY FOR THE ACTIVITY
5.1	Developer/Applicant
5.2	Local community
6.	IDENTIFIED ALTERNATIVES
6.1	No-Go option
6.2	Alternatives considered
7.	ENVIRONMENTAL IMPACT ASSESSMENT
	Aims of Environmental Impact Assessment
	Environmental Impact Assessment Procedure
	Description of Environmental Impacts
1.5	
8.	ENVIRONMENTAL IMPACT STATEMENT
8.1	Summary of key findings164
8.2	Comparative assessment of positive and negative implications of the proposed
	activity and alternatives
9.	
9.	CONCLUSION

LIST OF FIGURES

Figure 1: Rendering process flow	33
Figure 2: Locality Map	38
Figure 3: View of the rendering facility from the North-west	39
Figure 4: JoJo tanks used to store borehole water from an adjacent property	39
Figure 5: Backup generator and bunded diesel storage tank	40
Figure 6: The coal storage bunker	40
Figure 7: One of two coal fired boilers used to generate steam on site	41
Figure 8: The two broiler stacks	41
Figure 9: Trucks and tankers are used to bring abattoir waste and mortalities to the facility	42
Figure 10: The waste intake area	42
Figure 11: The blood storage tank	43
Figure 12: The cooking vessels and offloading area (where the product is removed from the vesse	ls)
	43
Figure 13: The condensers	44
Figure 14: The bagging area	44
Figure 15: The product storage and dispatch area	45
Figure 16: Removal of boiler ash	45
Figure 17: The existing wastewater evaporation pond	46
Figure 18: Employee housing	46
Figure 19: Site layout showing the proposed wastewater collection tank	48
Figure 20: Geology of the site	50
Figure 21: Long-term rainfall range for the area (AGIS Comprehensive Atlas, 2007)	51
Figure 22: Long-term temperature range for the area (AGIS Comprehensive Atlas, 2007)	52
Figure 23: Wind Rose – January	53
Figure 24: Wind Rose – February	53
Figure 25: Wind Rose – March	53
Figure 26: Wind Rose – April	53
Figure 27: Wind Rose – May	53
Figure 28: Wind Rose – June	53
Figure 29: Wind Rose – July	54
Figure 30: Wind Rose – August	54
Figure 31: Wind Rose – September	54
Figure 32: Wind Rose – October	54
Figure 33: Wind Rose – November	54
Figure 34: Wind Rose – December	54
Figure 35: Topography of the site	56
Figure 36: Soil type of the site	58
Figure 37: Vegetation type at the site	60
Figure 38: Quaternary catchment of the site	68

Figure 39: Stiff diagram for the rendering facility's abstraction borehole	71
Figure 40: Expanded Durov diagram for the rendering facility's abstraction borehole	72
Figure 41: The wetland and wetland buffer in relation to the rendering facility.	77
Figure 42: Critical Biodiversity Area Map (SANBI, 2007)	78
Figure 43: Mean hourly odour ground level concentrations (OUE/m3) for the current scenario.	82
Figure 44: 98th Percentile of hourly means over a calendar (OUE/m3) for the current scenario.	83
Figure 45: Exceedence of the 1.5 OUE/m3 odour threshold for the current scenario.	84
Figure 46: Main sources of noise in the area	86
Figure 47: View of the site from the Schoemansdrift Road	87
Figure 48: Example of the notification letters sent (page 1)	95
Figure 49: Example of the notification letters sent (page 2)	96
Figure 50: Proof of Postage of Notification Letters	97
Figure 51: Proof of Uploading the Notification Letters to SAHRIS	98
Figure 52: Proof of advertisement placement in the Potchefstroom Herald newspaper	99
Figure 53: Proof of advertisement placement in the Beeld newspaper	100
Figure 54: Site Notice 1	101
Figure 55: Site Notice 1 (zoomed in)	102
Figure 56: Site notice 2	102
Figure 57: DWA's model for impact prediction (risk assessments)	135

LIST OF TABLES

Table 1: A summary of the impacts associated with the operation of the Chubby Chick rendering	
facility and its proposed upgrades.	10
Table 2: The EIR in terms of the EIA Regulations, 2010, under the NEMA, 1998	26
Table 3: Land owners of the current operation	33
Table 4: Listed activities in terms of the National Environmental Management: Waste Act, 2008.	34
Table 5: Listed activities in terms of the National Environmental Management: Waste Act, 2008.	35
Table 6: Administrative and water management boundaries	36
Table 7: Direction and distance to the nearest town(s)	36
Table 8: Details of adjacent land owners to the site	37
Table 9: IUCN Red List of threatened plant species (IUCN, 2013)	61
Table 10: IUCN Red List of threatened animal species (IUCN, 2013)	64
Table 11: Catchment information (GRDM) (Shangoni AquiScience, 2014)	67
Table 12: Hydrochemical and bacteriological results for the Chubby Chick Rendering Facility	
production borehole (Shangoni AquiScience, 2014)	70
Table 13: Effluent quality evaluated according to the General Limit for discharge into a water reso	ource
(Shangoni AquiScience, 2014)	74
Table 14: General wastewater limits per volume irrigation water (Shangoni AquiScience, 2014)	75
Table 15: Tlokwe City Council age structure -Census 2011 (Statistics South Africa, 2011).	87
	d
	-

. 🧭

Table 16: Applicable legislation, policies and/or guidelines	89
Table 17: List of adjacent landowners identified and notified	93
Table 18: Registered I&APs	103
Table 19: Comments and responses report	106
Table 20: Development vs. No-Go option	130
Table 21: Determination of Probability of Impact	136
Table 22: Determination of Magnitude of Impact	137
Table 23: Determination of Severity of impact	138
Table 24: Environmental impact assessment: Environment in general	141
Table 25: Environmental impact assessment: Fauna and Flora (Critical Biodiversity Area 2)	142
Table 26: Environmental impact assessment: Sensitive landscapes - Wetlands	144
Table 27: Environmental impact assessment: Topsoil and erosion	146
Table 28: Environmental impact assessment: Soil, surface water, stormwater and groundwater	ſ
pollution	148
Table 29: Environmental impact assessment: Atmosphere and Noise	157
Table 30: Environmental impact assessment: Infrastructure	159
Table 31: Environmental impact assessment: Resource usage	160
Table 32: Environmental impact assessment: Hygiene	161
Table 33: Environmental impact assessment: Heritage	162
Table 34: Cumulative impacts	163
Table 35: Comparison of the alternatives (identified in section 6 of this report) and the no-go of	ption
	165

LIST OF APPENDICES

APPENDIX A	-	Site Plan(s)
APPENDIX B	-	Photographs
APPENDIX C	-	Facility Illustration(s)
APPENDIX D	-	Specialist Reports and Specialist Declarations
APPENDIX E	-	Public Participation Documents
APPENDIX F	-	Environmental Management Programme (EMP)
APPENDIX G	-	Other Information – CVs of Environmental Practitioners

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DEFINITIONS

Environment

The surroundings (biophysical, social and economic) within which humans exist and that are made up of

- (i) the land, water and atmosphere of the earth;
- (ii) micro-organisms, plant and animal life;
- (iii) any part or combination of (i) and (ii) and the interrelationships among and between them; and
- (iv) the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and wellbeing.

Environmental Aspects

Elements of an organisation's activities, products or services that can interact with the environment.

Environmental Degradation

Refers to pollution, disturbance, resource depletion, loss of biodiversity, and other kinds of environmental damage; usually refers to damage occurring accidentally or intentionally as a result of human activities.

Environmental Impacts

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services.

Environmental Impact Assessment

A study of the environmental consequences of a proposed course of action.

Environmental Impact Report

A report assessing the potential significant impacts as identified during the environmental impact assessment.

Environmental impact

An environmental change caused by some human act.

Land use

The various ways in which land may be employed or occupied. Planners compile, classify, study and analyse land use data for many purposes, including the identification of trends, the forecasting of space and infrastructure requirements, the provision of adequate land area for necessary types of land use, and the development or revision of comprehensive plans and land use regulations.

Pollution Prevention

Any activity that reduces or eliminates pollutants prior to recycling, treatment, control or disposal.

Public Participation Process

A process of involving the public in order to identify needs, address concerns, in order to contribute to more informed decision making relating to a proposed project, programme or development.

Topography

Topography, a term in geography, refers to the "lay of the land" or the physio-geographic characteristics of land in terms of elevation, slope and orientation.

Vegetation

All of the plants growing in and characterising a specific area or region; the combination of different plant communities found there.

Waste

Waste is unwanted or undesired material left over after the completion of a process. "Waste" is a human concept: in natural processes there is no waste, only inert end products.

Water Resource

- a river or a spring;
- a natural channel in which water flows regularly or intermittently;
- a wetland, lake or dam into which, or from which, water flows;
- any collection of water which the Minister may declare to be a watercourse; and
- surface water, estuaries and aquifers (underground water).

All water bodies in the hydrological cycle, including underground water, are regarded as water resources.

Water Course

- a river or spring;
- a natural channel or depression in which water flows regularly or intermittently;
- a wetland, lake or dam into which, or from which water flows; and
- any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse as defined in the National Water Act, 1998 (Act No. 36 of 1998).

Water Use

Water use includes taking and storing water, activities which reduce stream flow, waste discharges and disposals, controlled activities (activities which impact detrimentally on a water resource), altering a watercourse, removing water found underground for certain purposes, and recreation.

Wastewater

Wastewater is water containing waste, or water that has been in contact with waste material.

- Wastewater includes
 - domestic wastewater
 - biodegradable industrial wastewater
 - industrial wastewater.

Wetland

Means land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil.

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ABBREVIATIONS

BID	-	Background Information Document
CRR	-	Comments and Responses Report
DEA	-	Department of Environmental Affairs
DWS	-	Department of Water and Sanitation
EAP	-	Environmental Assessment Practitioner
EIA	-	Environmental Impact Assessment
EIR	-	Environmental Impact Report
EMF	-	Environmental Management Framework
EMP	-	Environmental Management Programme
GN	-	Government Notice
I&AP	-	Interested and Affected Party
NEMA	-	National Environmental Management Act, (Act No. 107 of 1998), as amended
R	-	Regulation

1. INTRODUCTION

This final Environmental Impact Report forms part of an application for a Waste Management License for the Chubby Chick rendering facility on Portion 198 of the farm Wilgeboom 458 IQ. The application is made in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008).

The application process is undertaken on behalf of the applicant, Cycle City (Pty) Ltd – Trading as Chubby Chick Enterprises, by Shangoni Management Services (Pty) Ltd. Shangoni was appointed, as independent environmental practitioner, to assist the applicant in undertaking the process as prescribed in the previously mentioned environmental legislation.

A Waste Management License application was submitted to the identified competent authority (the National Department of Environmental Affairs). The application requires that an Environmental Impact Assessment (Scoping and Environmental Impact Reporting) process be undertaken. The Department subsequently registered the project and the formal EIA process was thereby initiated. All the findings from the scoping and EIA processes are included in this report.

This Environmental Impact Assessment Report is divided into the following parts:

- Part 1: Introduction (including a description of the project);
- Part 2: Nature and extent of the environment affected by activity;
- Part 3: Applicable legislation and guidelines;
- Part 4: Public Participation Process;
- Part 5: Need and desirability for the project;
- Part 6: Description of alternatives;
- Part 7: Environmental Impact Assessment;
- Part 8: Environmental Impact Assessment Statement; and
- Part 9: Conclusion.

1.1 Process followed

1.1.1 The EIR in terms of the requirements of NEMA, 1998

Regulation 31(2) of the EIA Regulations, 2010 under the NEMA, 1998, lists aspects that must be included in EIA Reports (EIRs). The table below indicates the parts where information has been provided as part of this EIR.

Regulation No:		Description	EIR Part
R543 Regulation 31(2)(a)		Details of the Environmental Assessment Practitioner (EAP).	Part 1 & Appendix G
	(i)	Details of the EAP who prepared the report.	Appendix G

Table 2: The EIR in terms of the EIA Regulations, 2010, under the NEMA, 1998

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Regulation No:		Description	EIR Part
	(ii)	Details of the expertise of the EAP to carry out the environmental impact assessment.	
R543 Regulation 31(2)(b)		A description of the proposed activity.	Part 1
R543 Regulation 31(2)(c)		A description of the property on which the activity is to be undertaken and the location of the activity on the property.	Part 1
R543 Regulation 31(2)(d)		A description of the environment that may be affected by the activity and the manner in which the physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity.	Part 2
	(i)	Details of the public participation process conducted: Steps undertaken in accordance with the plan of study.	
	(ii)	List of persons, organisations and organs of state that were registered as interested and affected parties.	
R543 Regulation 31(2)(e)	(iii)	A summary of comments received from, and a summary of issues raised by registered interested and affected parties, the date of receipt of these comments and the response of the EAP to those comments.	Part 4 & Appendix E
	(iv)	Copies of any representations and comments received from registered interested and affected parties.	
R543 Regulation 31(2)(f)		A description of the need and desirability of the proposed activity.	Part 5
R543 Regulation 31(2)(g)		A description of identified potential alternatives to the proposed activity, including advantages and disadvantages that the proposed activity or alternatives may have on the environment and the community that may be affected by the activity.	Part 6, 7 & 8
R543 Regulation 31(2)(h)		An indication of the methodology used in determining the significance of potential environmental impacts.	Part 7
R543 Regulation 31(2)(i)		A description and comparative assessment of all alternatives identified during the environmental impact assessment process.	Part 6 & 8
R543 Regulation 31(2)(j)		A summary of the findings and recommendations of any specialist reports or report on a specialised process.	Part 2 & 7

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Regulation No:		Description	EIR Part
R543 Regulation 31(2)(k)		A description of all environmental issues that were identified during the environmental impact assessment process, an assessment of the significance of each issue and an indication of the extent to which the issue could be addressed by the adoption of mitigation measures.	Part 7
(i) (ii) (iii) (iii) (iii) (iv) (v) (v) (v) (vi)		An assessment of each identified potentially significant impact, including: Cumulative impacts. The nature of the impact. The extent and duration of the impact. The probability of the impact occurring. The degree to which the impact can be reversed. The degree to which the impact may cause irreplaceable loss of resources. The degree to which the impact can be mitigated.	Part 7
R543 Regulation 31(2)(m)		A description of any assumptions, uncertainties and gaps in knowledge.	Part 9 (if applicable)
R543 Regulation 31(2)(n)		A reasoned opinion as to whether the activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.	Part 9
(i) R543 Regulation 31(2)(o) (ii)		An environmental impact statement which contains: A summary of the key findings of the environmental impact assessment. A comparative assessment of the positive and negative implications of the proposed activity and identified alternatives.	Part 8
R543 Regulation 31(2)(p)		A draft environmental management programme containing the aspects contemplated in Regulation 33 of the EIA Regulations, 2010.	Appendix F
R543 Regulation 31(2)(q)		Copies of any specialist reports.	Appendix D
R543 Regulation 31(2)(r)		Any specific information that may be required by the competent authority.	None at present*
R543 Regulation 31(2)(s)		Any other matters required in terms of sections 24(4)(a) and (b) of the Act.	None at present

* No specific requests have been received from the competent authorities to date.

1.2 Details of the project applicant

Name of Applicant	Cycle City (Pty) Ltd. – Trading as Chubby Chick Enterprises
Postal Address	PO Box 288, Potchefstroom, 2520
Telephone No.	018 285 2048
Fax No.	018 297 3573
Farm name and portion on which the activities take place	Portion 198 of the farm Wilgeboom 458 IQ
Title Deed Number and 21 Digit Code	T0IQ000000045800198
Co-ordinates of operation	26°47'16.80"S; 27°08'58.39"E

1.3 Appointed Environmental Assessment Practitioner

Name of firm	Shangoni Management Services (Pty) Ltd.	Shangoni Management Services (Pty) Ltd.		
Postal address	PO Box 74726 Lynwood Ridge Pretoria 0040			
Telephone No.	012 807 7036			
Fax	012 807 1014/086 643 5360			
E-mail	lizette@shangoni.co.za			
Team of Environmental Assessment	Practitioners on project			
Name	Qualifications & experience to conduct the EIA*	Responsibility		
Mr Jan Nel	 MSc Environmental Management (University of the Free State) More than 20 years' experience conducting Environmental Impact Assessments and Waste Management License Applications 	Project Director		
Ms. Lizette Crous	 MSc. Environmental Management (University of London) More than 4 years' experience conducting Environmental Impact Assessments and Waste Management License Applications 	EAP		
Ms Karien Venter	 B.Sc. (Hons) Environmental Management More than 1 years' experience conducting Environmental Impact Assessments and Waste Management License Applications. 			

* Detailed CVs for the project team are attached (Appendix G).

Jan Nel – Project Director

Jan has been actively involved or the past 16 years in environmental management within the mining industry, providing assistance with EMP Compliance, Environmental Impact Assessments (EIA). Financial Provision Calculations, Closure Plans, Rehabilitation Plans, Environmental Management Programme Reports (EMP) and EMP Performance Assessments. He is further experienced in environmental management through third party certification audits as well as Environmental Management System (EMS) implementation and has in excess of 8000 audit hours to date. Jan is also the vice chairman of TC 207 in South Africa.

Lizette Crous – Environmental Practitioner

Lizette obtained a B.Sc. degree specialising in Biodiversity and Ecology from the University of Stellenbosch. She has also completed a M.Sc. in Environmental Management at the University of London and is responsible for Waste Management License Applications and Environmental Impact Assessments (EIA) at Shangoni.

Karien du Plessis – Environmental Practitioner

Karien obtained a B.Sc. degree in Biological Science with Zoology and Physiology as majors. She went on to complete her B.Sc. Honors degree in Environmental Science at the North-West University majoring in Aquatic Ecosystem Health. She is currently assisting in Waste Management License Applications and Environmental Impact Assessments (EIAs) at Shangoni.

1.4 Current situation

The Chubby Chick rendering facility has been operational since 1997 and has a Sterilisation License in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947). The facility does, however, not have a Waste Management License and this application and its associated EIA process has therefore been initiated. A separate application for a Water Use License will also be submitted to the relevant authority and a provisional Atmospheric Emission License has been issued for the rendering facility by the North West Department of Rural, Environmental and Agricultural Development.

The rendering industry has a positive impact on the environment by converting highly-perishable poultry waste that cannot be consumed by humans, into a valuable commodity (COWI Consulting Engineers and Planners AS, 2000) that can be used in the production of animal feeds. This decreases the amount of waste that needs to be disposed of at local landfill/hazardous waste disposal sites and also eliminates the possibility of decomposing waste polluting the soil, surface- and ground- water of an area.

Rendering facilities may, however, also produce negative environmental impacts such as:

- Atmospheric pollution;
- Water pollution and;

• Soil degradation.

The Chubby Chick rendering facility is an independent rendering facility situated on Portion 198 of the farm Wilgeboom 458 IQ, North West Province. The facility is an inedible rendering plant, i.e. it produces a product that is not intended for human consumption. The facility has been operational since 1997 and has a Sterilisation License in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947).

The facility currently receives chicken waste [blood, feathers, chicken pieces, fat and intestines (mala)] from the two Chubby Chick abattoirs in Potchefstroom and also receives chicken mortalities from the Chubby Chick (Fourie's Poultry) chicken farms on a daily basis. The facility operates 24/7 and processes the poultry waste into a high-protein poultry by-product meal (PBPM). A maximum of 60 tons of poultry waste is processed per day. The facility has a Sterilisation License in terms of the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 36 of 1947) for its high-protein, poultry by-product meal is used as a protein source in the production of animal feeds. The current by-product meal production process, a batch rendering process, is shown in Figure 1 and is summarised below:

- The facility has two sections separated by a concrete partition. The "dirty" area is from the waste unloading area to where the waste is loaded into the pressure cooking vessels. The "clean" area is from where the cooked product is loaded out of the cooking vessels to where the finished product is bagged.
- Chicken waste (feathers, chicken pieces, fat and intestines) from the Chubby Chick abattoirs and mortalities from their chicken farms are brought to the rendering facility (hereafter referred to as "the facility"). The waste is stored within the rendering facility building, in the intake area.
- Blood is brought from the abattoirs in a tanker and is pumped into a 10m³ holding tank at the rendering facility.
- Waste and blood is loaded into the three pressure cooking vessels. Steam is generated in two coal-fired boilers for use in the sterilisation process. Each boiler has its own stack. Boiler ash is removed from the site to a disposal facility.
- Within the cooking vessels, a vacuum is created and the waste is cooked and sterilised using pressure and high temperatures.
- Steam is vented from the cooking vessels and passes through a collection tank where solids settle out. From there, the air passes through two condensers. Water from the condensers flows to a trench/earthen canal from where the water is pumped into an earth evaporation dam to the north-east of the facility. Non-condensibles, such as VOCs (volatile organic compounds), pass from the condensers to the biofilter. In the biofilter, the air passes through a biofilter medium within which microorganisms reside. The odour causing particles are a food source for the microorganisms and are therefore consumed by the microorganisms. In this system, the odourous atmospheric emissions generated at the rendering facility (during the cooking process) are captured and degraded (consumed).

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- The sterilised product is removed from the cooking vessels when the moisture content has decreased to the required percentage.
- The product passes through a hammermill and screen. In this step any unwanted solids, such as stones, are removed from the product.
- The product is then placed into bags and removed from the site to be used in the production of animal feeds.

The rendering facility obtains electricity from Eskom, but also has a backup generator on site. There is also an above ground, bunded diesel tank.

Water used at the facility for the boilers, washing, toilets and showers is obtained from a borehole on a neighbouring property owned by the applicant (Portion 0 of the farm Vogelzang 467 IQ). The water is pumped to the rendering facility via a pipeline. Wastewater is produced from the following:

- Raw material liquids;
- Cooking and drying condensate;
- Washing and sanitation of the plant;
- Boiler water usage (Sindt, 2006); and
- Sewage and grey water from the shower facilities.

Per day, approximately 55m³ of wastewater is generated from the rendering process. The wastewater currently flows into trenches/earthen canals and is then pumped to an earth evaporation dam to the north-east of the rendering facility.

The facility currently employs 25 people. Employees are housed on the premises in accommodation separate from the rendering facility.

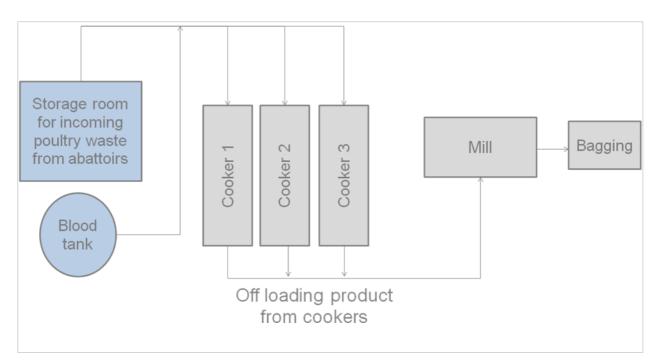


Figure 1: Rendering process flow

Farm Name	Title deed	Owner
Portion 198 of the farm Wilgeboom	T101109/1996	Cycle City (Pty) Ltd. [part of Fourie's
458 IQ		Poultry Farms (Pty) Ltd.]

1.5 Proposed activities

Improvements are proposed to manage wastewater generated at the rendering facility more efficiently. Firstly, feather presses will be installed at the abattoirs that supply waste to the rendering facility. The feather presses will press out moisture from the feathers (plucked from the chickens before they are slaughtered), thereby reducing the moisture content of the abattoir waste, which includes the feathers and that is taken to the rendering facility. This, in turn, will decrease the volume of wastewater generated at the rendering facility during the rendering process as less moisture will be contained in the feathers and therefore less moisture will be cooked out when the feathers are rendered. It is expected that the volume of wastewater generated at the rendering facility will decrease from 55m³ to 20m³ of wastewater per day. This reduction in volume has removed the need for a wastewater treatment works and the installation of a holding tank for the wastewater is more feasible and cost effective.

Wastewater from the rendering process will pass through a 2mm screen, in an existing sump, to remove solids and will then be pumped into the wastewater collection tank. The removed solids will be taken back to the rendering intake area for further cooking. In the wastewater collection tank, the wastewater will be temporarily stored prior to the wastewater being taken offsite using a tanker for disposal at the municipal sewage treatment works on a daily basis. Grey water from the showers will also feed into this wastewater collection tank and will be removed offsite for disposal. The wastewater collection tank will



be constructed adjacent to, and to the north-west, of the rendering facility, in an already disturbed area of land. The collection tank will have the following dimensions and designs:

- A round, steel walled tank with a diameter of 10m;
- The tank will have a capacity of 100m³; and
- The tank will be fitted on the inside with a PVC liner to ensure no wastewater can leak out of the tank.

Sewage from the rendering facility will be contained in a separate conservancy tank and will be taken offsite on a weekly basis using a tanker for disposal at the municipal sewage treatment works.

The above listed improvements require a water use license and registration, together with other water use activities, such as the storage of water, occurring at the facility. A separate Environmental Impact Assessment process is underway at the North West Department of Rural, Environmental and Agricultural Development in support of the Water Use Licence application that will be submitted to the Department of Water and Sanitation in due course.

At the time of submission of the Waste Management License application forms, the following listed waste management activities were triggered at the rendering facility in terms of the National Environmental Management: Waste Act, 2008:

Number and date of the relevant notice	Activity No	Description
GNR 718 of 3 July 2009	Category A, No.	The storage including the temporary storage of hazardous waste at
	2	a facility that has the capacity to store in excess of $35 \ensuremath{\text{m}}^3$ of
		hazardous waste at any one time, excluding the storage of
		hazardous waste in lagoons.
GNR 718 of 3 July 2009	Category B, No.	The storage including the temporary storage of hazardous waste in
	1	lagoons.
GNR 718 of 3 July 2009	Category B, No.	The reuse and recycling of hazardous waste.
	2	
GNR 718 of 3 July 2009	Category B, No.	The recovery of hazardous including the refining, utilisation or co-
	3	processing of waste at a facility with a capacity to process more than
		500kg of hazardous waste per day excluding recovery that takes
		place as an integral part of an internal manufacturing process within
		the same premises or unless the Minister has approved re-use
		guidelines for the specific waste stream.
GNR 718 of 3 July 2009	Category B, No.	The biological, physical or physio-chemical treatment of hazardous
	4	waste at a facility that has the capacity to receive in excess of 500kg
		of hazardous waste per day.

Table 4: Listed activities in terms of the National Environmental Management: Waste Act, 2008.



Number and date of the relevant notice	Activity No	Description
GNR 718 of 3 July 2009	Category B, No.	The treatment of hazardous waste using any form of treatment
	5	regardless of the size or capacity of such as facility to treat such waste.
GNR 718 of 3 July 2009	Category B, No. 6	The treatment of hazardous waste in lagoons.
GNR 718 of 3 July 2009	Category B, No. 7	The treatment of effluent, wastewater or sewage with an annual throughout capacity of 15 000 cubic metres or more.
GNR 718 of 3 July 2009	Category B, No. 11	The construction of facilities for activities listed in Category B of this Schedule (not in isolation to associated activity).

On the 29th of November 2013 the National Department of Environmental Affairs made changes to the "List of Waste Management Activities that have, or are likely to have, a detrimental effect on the environment" and that require a Waste Management License. In terms of the new list (GNR. 921 of 29 November 2013), the rendering facility triggers listed waste management activities as given in the table below.

The storage of hazardous waste (and specifically process wastewater) in lagoons no longer requires a Waste Management License as the Category B, No. 1 activity previously triggered under GNR 718 of 3 July 2009 now specifically excludes the storage of effluent, wastewater or sewage. The storage of hazardous waste no longer requires a Waste Management License, but the storage of more than 80m³ now falls under Category C. Such storage must comply with the Norms and Standards for Storage of Waste, 2013. The treatment of process wastewater and sewage has been moved from being governed under the Waste Act, 2008, to being governed under the National Environmental Management Act, 1998. The construction of facilities for the treatment of effluent, wastewater or sewage with a daily throughput of more than 2 000m³ now requires environmental authorisation under NEMA, 1998. The rendering facility will only treat a combined volume of approximately 55m³ of process wastewater and sewage on a daily basis and therefore no environmental authorisation is required for the construction of the proposed new wastewater treatment works and sewage management system.

Number relevant			the	Activity No	Description
GNR.	921	of	29	Category B, No.	The reuse or recycling of hazardous waste in excess of 1 ton per
Novemb	er 2013			2	day, excluding reuse or recycling that takes place as an integral part
					of an internal manufacturing process within the same premises.
GNR.	921	of	29	Category B, No.	The recovery of waste including the refining, utilisation, or co-
November 2013		3	processing of the waste at a facility that processes in excess of 100		
				tons of general waste per day or in excess of 1 ton of hazardous	
					waste per day, excluding recovery that takes place as an integral
					part of an internal manufacturing process within the same premises.

Table 5: Listed activities in terms of the National Environmental Management: Waste Act, 2008.

Number relevant			the	Activity No	Description
GNR.	921	of	29	Category B, No.	The treatment of hazardous waste in excess of 1 ton per day
Novemb	er 2013			4	calculated as a monthly average; using any form of treatment excluding the treatment of effluent, wastewater or sewage.
GNR.	921	of	29	Category B, No.	The construction of a facility for a waste management activity listed
Novemb	er 2013			10	in Category B of this Schedule (not in isolation to associated waste management activity).

1.5.1 Proposed locality

The site of the rendering facility is on Portion 198 of the farm Wilgeboom 458 IQ, in close proximity to Potchefstroom.

The site is situated within the Tlokwe City Council's jurisdiction. This local municipality forms part of the Dr. Kenneth Kaunda District Municipality, within the North West province.

Table 6: Administrative and water management boundaries

Province	North West province
District Municipality	Dr. Kenneth Kaunda
Local Municipality	Tlokwe City Council
Ward	2
Department of NW DEDECT Local Office	Potchefstroom
Catchment Zone	C23L
Water Management Area (if applicable)	Upper Vaal Water Management Area

Table 7: Direction and distance to the nearest town(s)

Closest town	Distance from site	Direction from town to site
Potchefstroom	6.9km	South-east
Parys	31km	West

The site locality map is given below as Figure 2 and is also attached in Appendix A. Site photographs are provided below (refer to Figure 3 to Figure 18 and Appendix B).

1.5.2 Land tenure and use of immediately adjacent land

Land use surrounding the site includes agricultural land, farm houses, a restaurant, go-cart route and tourist accommodation.

Details of adjacent land owners of the rendering facility are listed in the table below. Refer also to Section 4 for more detail regarding the Public Participation Process.

Address or property description	Owner
F.D. Grimbeek	Portion 6 Wilgeboom
Herman Pretorius	Portion 50 Wilgeboom
J.P. Moolman	Holding 51A Wilgeboom
A.B. Hill	Portion 177 Wilgeboom
P.M. Fouché	Holding 52 Wilgeboom

Table 8: Details of adjacent land owners to the site



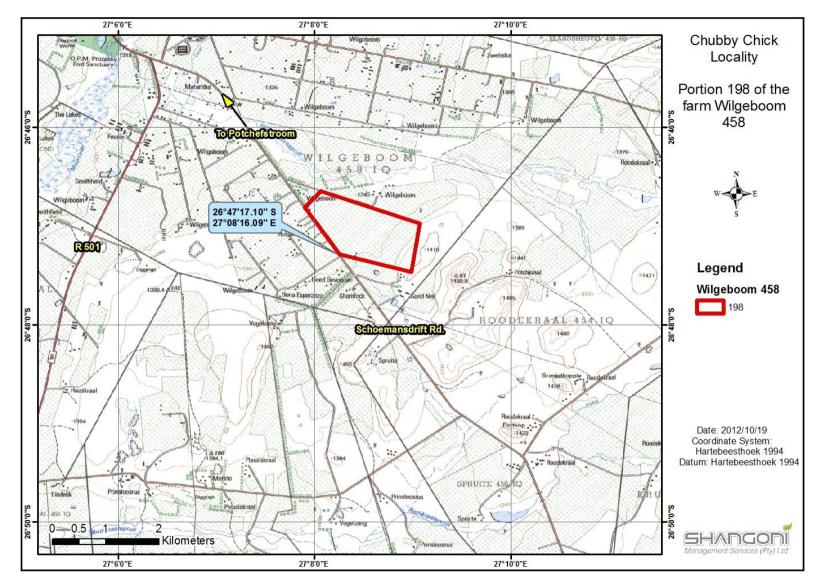


Figure 2: Locality Map



Figure 3: View of the rendering facility from the North-west



Figure 4: JoJo tanks used to store borehole water from an adjacent property



Figure 5: Backup generator and bunded diesel storage tank



Figure 6: The coal storage bunker



Figure 7: One of two coal fired boilers used to generate steam on site



Figure 8: The two broiler stacks



Figure 9: Trucks and tankers are used to bring abattoir waste and mortalities to the facility



Figure 10: The waste intake area



Figure 11: The blood storage tank



Figure 12: The cooking vessels and offloading area (where the product is removed from the vessels)



Figure 13: The condensers



Figure 14: The bagging area



Figure 15: The product storage and dispatch area



Figure 16: Removal of boiler ash



Figure 17: The existing wastewater evaporation pond



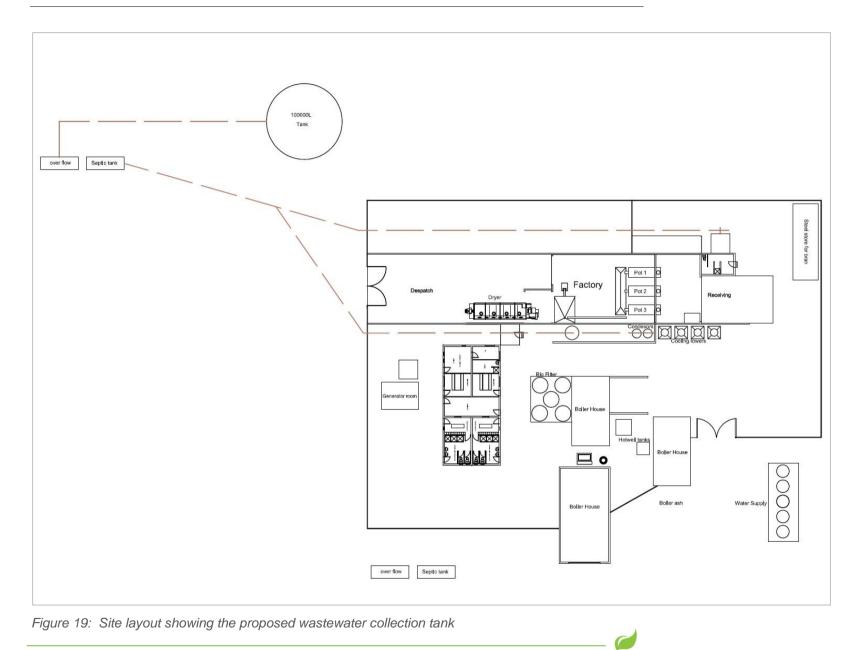
Figure 18: Employee housing

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1.5.3 Design

The layout plan and designs for the wastewater collection tank are shown in the figures below.





2. NATURE AND EXTENT OF THE ENVIRONMENT AFFECTED BY ACTIVITY

The following section provides a description of the baseline or status quo environment as well as the social-economic parameters that characterise the region and study area, and is derived from various specialist studies as well as data sources including aerial photographs, topo-cadastral maps and national and provincial databases.

2.1 Geology

As shown in the figure below, the property is underlain by two geological units. The eastern part of the site, where the rendering facility is located, is underlain by siliciclastic rocks of the Magaliesberg Formation, Pretoria Group. The Magaliesberg formation consists mostly of quartzite and mixed felsic rocks, mostly consisting of diabase. The central and western portion of the property is underlain by fine-grained felsic rocks of the Vaalian Erathem.



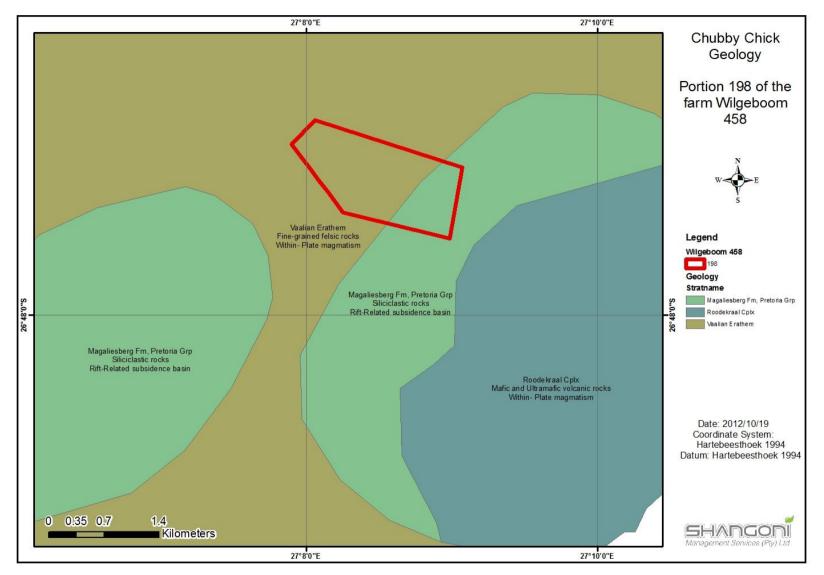


Figure 20: Geology of the site

2.2 Regional climate

2.2.1 Rainfall

The site lies within a warm temperate region with strongly seasonal summer rainfall and very dry winters (Mucina & Rutherford, 2006). The mean annual rainfall for the site ranges between 401-800mm. The minimum and maximum long-term temperature range for the site is given in the figure below.

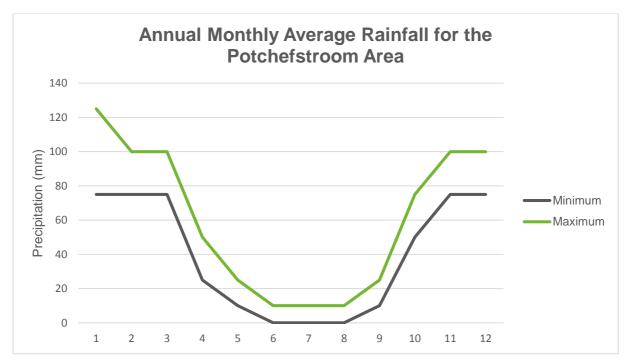


Figure 21: Long-term rainfall range for the area (AGIS Comprehensive Atlas, 2007)

2.2.2 Temperature

Summer temperatures in the area are high and severe frost is frequently experienced during winter months. The mean annual maximum temperature for the site ranges between 27.1 and 31°C while the mean annual minimum temperature for the site ranges between 0.1 and 4°C. The minimum and maximum temperature range for the site is given in the figure below.

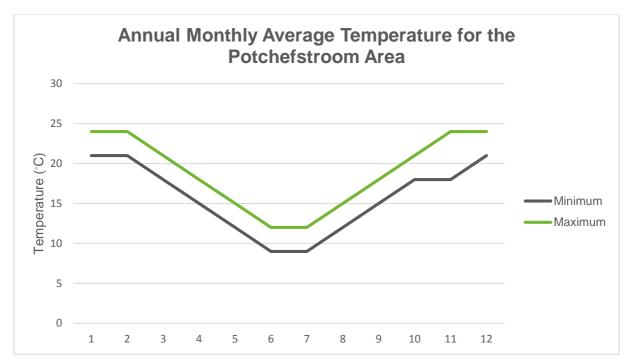


Figure 22: Long-term temperature range for the area (AGIS Comprehensive Atlas, 2007)

2.2.3 Wind

The site is approximately 6.9km from Potchefstroom. Wind data from the Potchefstroom weather station has therefore been used for this application. The wind roses are given in the figures below (www.windfinder.com).



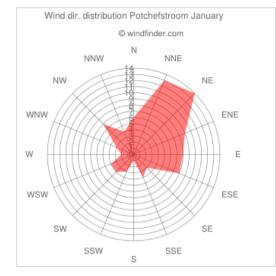


Figure 23: Wind Rose – January

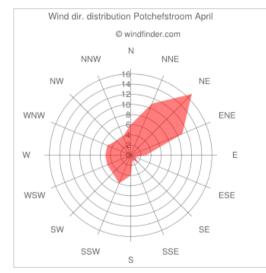


Figure 26: Wind Rose – April

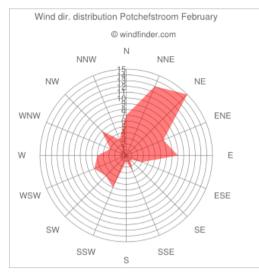


Figure 24: Wind Rose – February

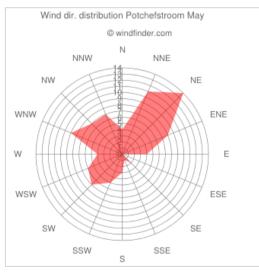


Figure 27: Wind Rose – May

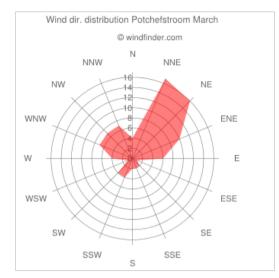


Figure 25: Wind Rose – March

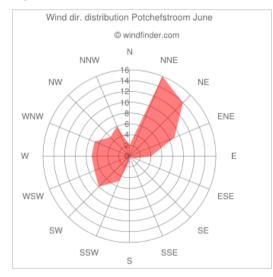


Figure 28: Wind Rose – June



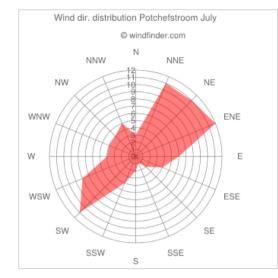


Figure 29: Wind Rose – July

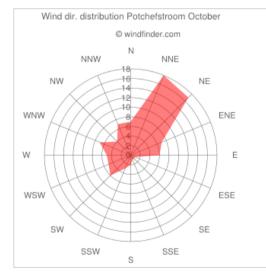


Figure 32: Wind Rose – October

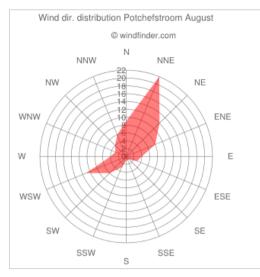


Figure 30: Wind Rose – August

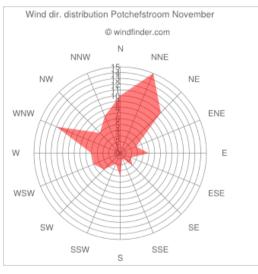


Figure 33: Wind Rose – November

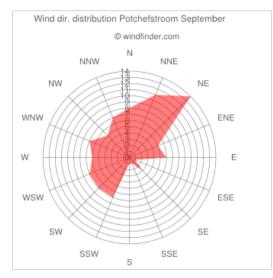


Figure 31: Wind Rose – September

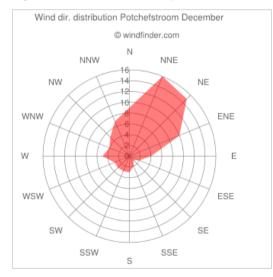


Figure 34: Wind Rose – December

2.3 Topography

The Rand Highveld grasslands are generally found in highly variable landscapes with ridges that are slightly elevated above surrounding undulating, sloping plains (Mucina & Rutherford, 2006). As can be seen in the figure below, the ground slopes downwards from the eastern to western part of the property. The elevation is between 1 398 metres above sea level on the eastern boundary of the site and 1 348 metres above sea level on the western boundary of the site. The rendering facility itself is situated at an elevation of 1 387metres above sea level. The slope of the site is up to 5% (AGIS, 2007).

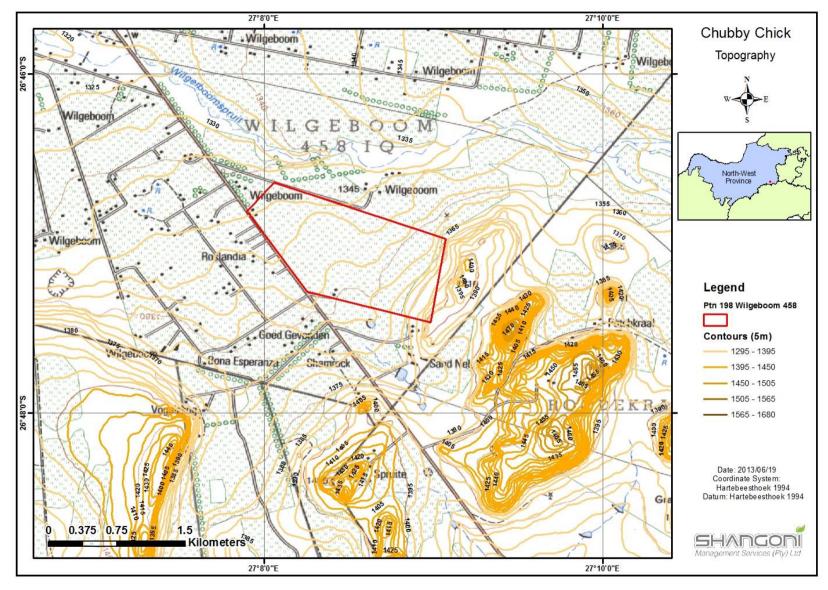


Figure 35: Topography of the site

2.4 Soils

The soil type of the site is S17, as shown in the figure below. This soil type is an association of soil classes 1 to 4 and consists of undifferentiated, structureless soils. These soils have favourable physical properties, but may have restricted soil depths, high erodibility, low base status, and/or excessive or imperfect drainage. The soil depth is generally between 450 and 750mm, the clay content is between 15 and 35% and the soils are euthrophic (high in nutrients) (AGIS, 2007).

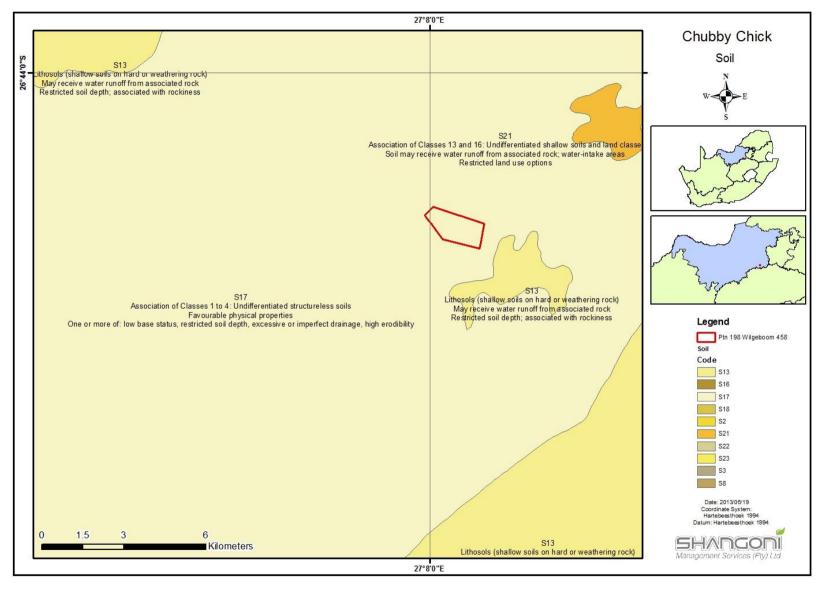


Figure 36: Soil type of the site

Shangoni Management Services (Pty) Ltd

2.5 Land use and land capability

The property is zoned as Agriculture (72) Business land and the Chubby Chick rendering facility is situated on the property, together with a number of crop fields. As a result of the previously mentioned land uses, few natural areas remain on the property.

According to the AGIS Comprehensive Atlas (2007) the land capability of the property is "moderate potential agricultural land". The dominant land use surrounding the property is cultivated land, with farm houses, a restaurant, go-cart route and tourist accommodation also present.

2.6 Vegetation

2.6.1 Vegetation type

Due to the disturbed nature of the vegetation onsite, a desktop assessment was undertaken at this stage to describe the nature of any natural vegetation surrounding the site.

The property falls within the Grass Land biome region. The Grassland Biome is found mainly on the high central plateau of South Africa and the inland regions of KwaZulu-Natal and the Eastern Cape. Frost, fire and grazing maintain the dominance of grasses and prevent the establishment of trees. Fire is a natural factor caused by lightning and regular burning is essential for maintaining the structure and biodiversity of this biome. Grasslands are unique ecosystems with rich and often highly specialised animal life, both above and belowground. Formerly, native grasslands supported vast herds of ungulates such as blesbok, black wildebeest and springbok. Bird densities range from 50 to 380 birds per 100 ha, and include a wide range of species.

South African grasslands essentially comprise of a simple, single-layered herbaceous community of tussocked (or bunch) grasses. It is not generally known that the majority of plant species in grasslands are non-grassy herbs, most of which are perennial plants with large underground storage structures that can live for several decades. The Grassland Biome has an extremely high biodiversity, second only to the Fynbos Biome. At a 1 000 square metre scale, the average species richness of the Grassland Biome is even higher than those of most Fynbos communities, being surpassed only by Renosterveld.

As shown in the figure below, the specific grassland type is "Rand Highveld Grasslands". These grasslands occur in Gauteng, North-West, Free State and Mpumalanga at an altitude of 1 300 to 1 635 metres above mean sea level, but can occur as high as 1 760 metres above mean sea level.

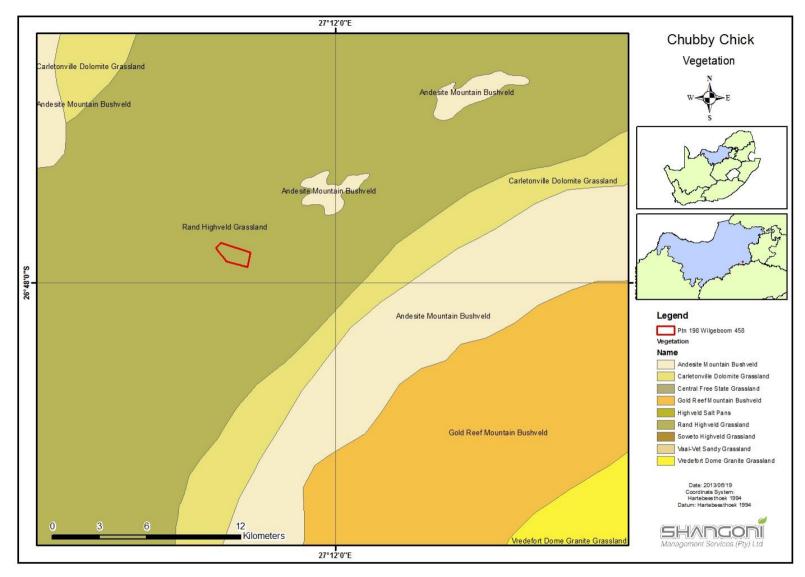


Figure 37: Vegetation type at the site

2.6.2 Dominant species

Within the Rand Highveld grasslands, the species-rich, sour, wiry grasslands alternate with low, sour shrubland on steeper slopes and rocky outcrops. On the plains, the genera *Themeda, Eragrotis, Heteropogon and Elionurus* are most common. A typical feature is the high diversity of herbs, many of which belong to the Asteraceae. Rocky ridges and hills have sparse (savannoid) woodlands with *Proteacaffra* subsp. *caffra*, *P. welwitschii, Acacia caffra* and *Celtis africana*, together with a rich suite of shrubs, among which the genus *Rhus* (especially *Rhus magalismonata*) is prominent.

Important, biologically important and endemic taxa within the Rand Highveld grasslands are given in Appendix D. The natural grasslands are considered endangered with only 1% conserved in statutory and private conservation areas. The target for conservation is 24% (Mucina & Rutherford, 2006).

2.6.3 Endangered or rare species

The following table shows the IUCN (International Union for Conservation of Nature and Nature Resources) Red List of threatened plant species that are found in the North West Province. Importantly, these species are not necessarily present at the specific project site. The following abbreviations are used: EN: Endangered; VU: Vulnerable; NT: Near Threatened; and LC: least concern.

Scientific name	Common name	Red List Status	
Agrostis lachnantha	-	LC	
Aloe peglerae	-	EN	
Aloe zebrina	-	LC	
Aponogeton desertorum	-	LC	
Asparagus aethiopicus	-	LC	
Bergia polyantha	-	LC	
Bolboschoenus glaucus	Tuberous Bulrush	LC	
Bulbine favosa	-	LC	
Cladium mariscus	Great Fen-Sedge, Saw Grass, Fen Sedge	LC	
Commelina benghalensis	Day Flower	LC	
Cyperus difformis	Smallflower Umbrella Sedge	LC	
Cyperus glaucophyllus	-	LC	
Cyperus rotundus	Nut-grass	LC	
Cyperus turrillii	-	LC	
Epilobium hirsutum	Great Willowherb	LC	
Erythrophysa transvaalensis	-	LC	
Frithia pulchra	-	VU	
Heteranthera callifolia	Mud plantain	LC	
Indigofera daleoides	-	LC	
Indigofera hofmanniana	-	LC	
Indigofera melanadenia	-	LC	

Table 9: IUCN Red List of threatened plant species (IUCN, 2013)

Scientific name	Common name	Red List Status
Agrostis lachnantha	rostis lachnantha -	
Aloe peglerae	-	EN
Aloe zebrina	-	LC
Aponogeton desertorum	-	LC
Asparagus aethiopicus	-	LC
Bergia polyantha	-	LC
Bolboschoenus glaucus	Tuberous Bulrush	LC
Bulbine favosa	-	LC
Cladium mariscus	Great Fen-Sedge, Saw Grass, Fen Sedge	LC
Commelina benghalensis	Day Flower	LC
Cyperus difformis	Smallflower Umbrella Sedge	LC
Cyperus glaucophyllus	-	LC
Cyperus rotundus	Nut-grass	LC
Cyperus turrillii	-	LC
Epilobium hirsutum	Great Willowherb	LC
Erythrophysa transvaalensis	-	LC
Frithia pulchra	-	VU
Heteranthera callifolia	Mud plantain	LC
Juncus bufonius	Toad Rush	LC
Juncus effusus	Soft Rush	LC
Juncus inflexus	Hard Rush	LC
Ludwigia octovalvis	-	LC
Ludwigia palustris	Hampshire-Purslane	LC
Mimulus gracilis	-	LC
Myriophyllum spicatum	Spiked Water-milfoil, Eurasian Water Milfoil	LC
Najas graminea	Ricefield Waternymph	LC
Nuxia glomerulata	-	LR/NT
Osteospermum muricatum	-	LC
Paspalum scrobiculatum	Kodo Millet	LC
Persicaria salicifolia	-	LC
Persicaria senegalensis	-	LC
Potamogeton crispus	Curled Pondweed	LC
Potamogeton nodosus	Loddon Pondweed	LC
Potamogeton octandrus	-	LC
Potamogeton trichoides	Hairlike Pondweed	LC
Ranunculus multifidus	-	LC
Samolus valerandi	Brookweed	LC
Sebaea pentandra	-	LC
Sporobolus discosporus	-	LC

2.7 Animal life

2.7.1 Commonly occurring species

For a full list of commonly occurring species in the North West Province or specifically in the vicinity of the project site please refer to Appendix D.

2.7.2 Endangered species

The following table shows the IUCN Red List of Threatened animal species that are found in the North West Province. Importantly, these species are not necessarily present at the specific project site. The following abbreviations are used: EN: Endangered; VU: Vulnerable; NT: Near Threatened; and LC: least concern.

Table 10: IUCN Red List of threatened animal species (IUCN, 2013)

Scientific name	Common name	Red List Status
	Mammals	
Graphiurus ocularis	Spectacled Dormouse, Namtap	LC
Pronolagus rupestris	Smith's Red Rock Hare, Smith's Red Rockhare	LC
Mystromys albicaudatus	White-tailed Mouse, White-tailed Rat	EN
	Insects	
Nesciothemis farinosa	Black-tailed Skimmer, Black-tailed Dancer, Black-tailed False-skimmer, Common Blacktail	LC
Pseudagrion kersteni	Kersten's Sprite, Powder-striped Sprite	LC
Anax ephippiger	Vagrant Emperor	LC
Anax imperator	Blue Emperor, Emperor Dragonfly	LC
Anax speratus	Orange Emperor	LC
Cacyreus virilis	Alternative Bush Blue, Mocker Blue, Eastern Bush Blue, Mocker Bronze	LC
Capys alphaeus	Orange-banded Protea Butterfly, Protea Scarlet	LC
Crocothemis sanguinolenta	Little Scarlet, Slim Scarlet-darter, Small Scarlet	LC
Diplacodes lefebvrii	Black Percher	LC
Frankenbergerius forcipatus	· ·	DD
Ischnura senegalensis	Common Bluetail, Marsh Bluetail	LC
Orthetrum chrysostigma	Epaulet Skimmer	LC
Orthetrum julia	Julia Skimmer	LC
Orthetrum trinacria	Long Skimmer	LC
Palpopleura deceptor	Deceptive Widow	LC
Pantala flavescens	Globe Skimmer, Wandering Glider, Globe Wanderer	LC
Paternympha narycia	Spotted-eye Brown, Small Hillside Brown	LC
Potamonautes calcaratus	-	LC
Rhyothemis semihyalina	Phantom Flutterer	LC
Sympetrum fonscolombii	Red-veined Darter	LC
Tramea basilaris	Keyhole Glider, Red Marsh Trotter, Wheeling Glider	LC

Scientific name	Common name	Red List Status
Trithemis annulata	Violet Dropwing, Violet-marked Darter	LC
Trithemis arteriosa	Red-veined Dropwing	LC
Trithemis furva	Navy Dropwing, Dark Dropwing	LC
Trithemis kirbyi	Orange-winged Dropwing, Rock Dropwing, Kirby's Dropwing	LC
Tuxentius calice	White Pierrot, White Pie	LC
	Reptiles	
Acontias percivali	Percival's Legless Skink	LC
Chamaeleo dilepis	Common African Flap-necked Chameleon, Flap-necked Chameleon	LC
Psammophis subtaeniatus	Stripe-bellied Sand Snake	LC
Lygodactylus nigropunctatus	Black-spotted Dwarf Gecko	LC
	Millipedes	
Doratogonus levigatus	ratogonus levigatus -	
Doratogonus rugifrons		LC
	Snails and slugs (Gastropoda)	
Biomphalaria pfeifferi	-	LC
Galba truncatula	-	LC
	Fish	
Barbus brevipinnis	Shortfin Barb	NT
Barbus motebensis	Marico Barb	VU
Barbus rapax	Southern Papermouth	LC
Barbus sp. nov. 'Waterberg'	Waterberg Shortfin Barb	NT
Barbus trimaculatus	Threespot barb, Threespot barb (FB)	LC
Chetia flaviventris	Canary Kurper	LC
Chiloglanis pretoriae	Shortspine Catlet, Shortspine Suckermouth	LC
Labeo rosae	Rednose Labeo	LC
Labeo umbratus	Moggel	LC
Labeobarbus aeneus	Vaal-orange Smallmouth Yellowfish	LC

Scientific name Common name		Red List Status	
Labeobarbus kimberleyensis	Largemouth Yellowfish, Vaal-orange Largemouth Yellowfish	NT	
Lestes pallidus	Pale Spreadwing, Pallid Spreadwing	LC	
Alopias vulpinus	Common Thresher Shark	VU	
Dasyatis chrysonota	Blue Stingray	LC	
Deania profundorum	Arrowhead Dogfish	LC	
Deania quadrispinosa	Longsnout Dogfish	NT	
Isurus oxyrinchus	Shortfin Mako	VU	
Labeo capensis	Orange River Mudfish	LC	
	Crustacea (Malacostraca)		
Potamonautes sidneyi	autes sidneyi Natal River Crab, Sidney's River Crab LC		
Potamonautes unispinus	Single-spined River Crab	LC	

2.8 Surface water

2.8.1 Catchment areas

The site is situated within the C23L quaternary catchment, of the Upper Vaal Water Management Area and the Central Highveld Groundwater Region.

Table 11: Catchment information (GRDM) (Shangoni AquiScience, 2014)

Catchment attribute	
Water Management Area	Upper Vaal
Quaternary catchment	C23L
Quaternary catchment area (km ²)	1211
Mean annual rainfall (GRDM)	612 mm/a
Mean annual runoff	36 mm/a
Baseflow	4 mm/a
Population (2000)	1350 Count
Mean annual evaporation	1600 - 1700 mm/a
Total groundwater use	0.73 Mm³/a
Ecoregion	Highveld
Present Eco Status Category	C Category
Recharge	38.37 mm/a
Exploitation potential	≈12 Mm³/a
Vegetation type	Rocky Highveld Grassland
Soil	Sand-Clay-Loam (SaClLm)
Groundwater General Authorization	75 m³/ha/a
Geology	Post Transvaal Diabase
Permanent Rivers	Vaal River & Mooi River
Ephemeral rivers	Wilgeboomspruit & Rooikraalspruit

The catchment's major water drainage system is the west flowing Vaal River, situated approximately 16 km south of the rendering facility. The Mooi River, a permanently flowing river, is a major tributary of the Vaal River and flows approximately 7km to the west of the rendering facility. The Mooi River has two ephemeral tributaries, the Wilgerboomspruit and the Rooikraalspruit. These streams can be found 1.6km to the north and 5km to the south of the rendering facility, respectively.

The major surface water flow direction in the immediate vicinity of the facility is west-northwest. The reason for this is the undulating topography, ranging from 1 320 mamsl north of the facility towards the Wilgerboomspruit and 1 485 mamsl south-east of the facility (Shangoni AquiScience, 2014).



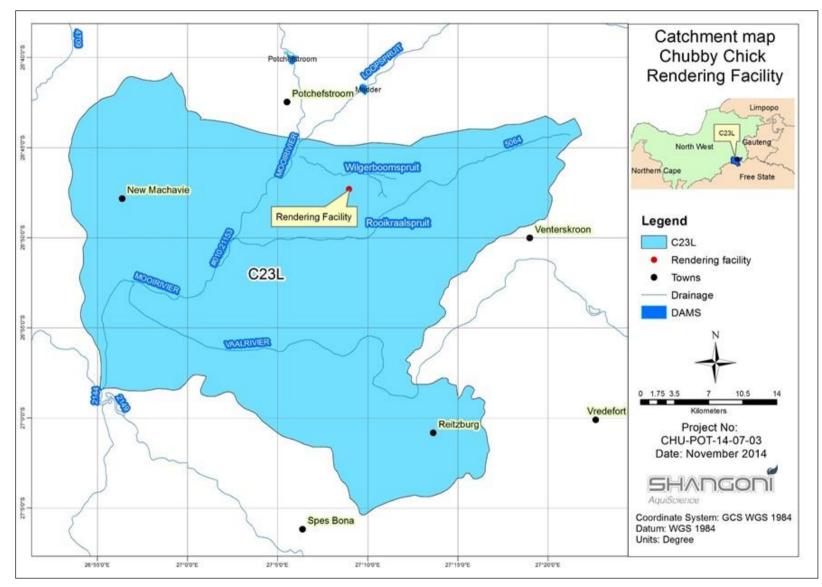


Figure 38: Quaternary catchment of the site

2.8.2 Mean annual runoff (MAR)

The Vaal River Catchment covers an area of 192 000km² and the mean annual runoff for this area of the catchment is approximately 1 100 million m³/annum (PDNA *et al.*, 2004).

2.8.3 Surface water quantity and use

No surface water abstraction or use occurs on the property, nor will such use occur in future.

2.8.4 Water authority

The relevant Water Authority is the Upper Vaal regional office, situated in Pretoria.

2.9 Groundwater

2.9.1 Aquifer type

The rendering facility is situated in a d3, Intergranular and Fractured aquifer region with median borehole yields of 0.5-2 litres/second (Geohydrological Map Sheet 2526, 1999). The aquifers are classified as "minor" aquifers according to the Vegter aquifer classification map (DWA, 2012). Larger yields may be found near fault zones or dolerite intrusions (dykes). Although not verified, it is believed that groundwater flow will be in a similar direction as the surface water flow, being from east to west in the immediate vicinity of the facility (Shangoni AquiScience, 2014).

2.9.2 Depth of water tables

The depth to water level is 12.9 metres below ground level and the groundwater recharge is 14mm/annum. Groundwater in the area is mostly used for livestock use, followed by industry use and lastly rural use (DWA, 2010).

2.9.3 Boreholes and springs

Approximately 55m³ of groundwater is abstracted per day for processing and domestic use at the rendering facility. The groundwater is abstracted from a borehole on an adjacent property (Portion 0 of the farm Vogelzang 467 IQ), owned by Chubby Chick/Cycle City.

The aquifer for the Farm Vogelsang is mostly of igneous/felsic type. Two major fault zones can be found immediately west and east of the borehole and also towards the south-east of the production borehole (Shangoni AquiScience, 2014).

2.9.4 Groundwater quality

Groundwater, from the production borehole, was evaluated against the SANS 241: 2011 drinking water guidelines. The water quality assessment found ammonia (NH₄) to be the only chemical constituent to



exceed the SANS drinking water standards. All other chemical constituents recorded within the SANS drinking water standards (refer to Table 12 for the water quality results).

The SANS drinking water standard used for ammonia is primarily based on aesthetic effects. Ammonia is not toxic to humans at concentrations usually found in drinking water. High levels of ammonia in drinking water can, however, be associated with indirect health effects, such as compromising the disinfection of water and giving rise to nitrite (NO₂) formation in distribution systems, which may result in taste and odour problems and may also be potentially toxic to infants.

The source of the high ammonia in the groundwater is unknown, but could be related to anaerobic decomposition of organic waste and/or runoff from agricultural lands, where ammonia salts may have been used for fertilizers.

Table 12: Hydrochemical and bacteriological results for the Chubby Chick Rendering Facility production
borehole (Shangoni AquiScience, 2014)

Locality / Guideline	Unit	Domestic use SANS 241	CCBH01
Parameter	Unit	(2011)	CCBHUI
рН	-	5 - 9.7	7.51
Electrical conductivity (EC)	mS/m	≤170ª	30.5
Total dissolved solids (TDS)	mg/l	1 200ª	220
Calcium (Ca)	mg/l	-	27.2
Magnesium (Mg)	mg/l	-	15.4
Sodium (Na)	mg/l	200 ^a	22.3
Potassium (K)	mg/l	-	1.54
Total alkalinity (M-ALK)	mg/l	-	145
Chloride (Cl)	mg/l	300 ^a	11.3
Sulphate (SO ₄)	mg/l	500	20.7
Aluminium (Al)	mg/l	0.3 ^b	<0.003
Iron (Fe)	mg/l	2.0	<0.003
Manganese (Mn)	mg/l	0.5	<0.001
Nitrate-nitrogen (NO ₃ -N)	mg N/I	11	5.96
Total ammonia-nitrogen (NH ₃ -N + NH ₄ -N)	mg N/I	1.5a	5.29
Orthophosphate (PO ₄ -P)	mg P/I	-	0.201
Fluoride (F)	mg/l	1.5	0.272
Tot Hardness	mg/l	-	131
Sodium adsorption ratio (SAR)	ratio	-	0.8
Chemical oxygen demand (COD)	mg/l	-	<0.082
Total coliforms	cfu/100 ml	0	<1
E.coli	cfu/100 ml	0	<1
DWA classification			Class 2

a Aesthetic guideline value

^b Operational guideline value

The Stiff and expanded Durov diagrams below indicate relatively fresh, recently recharged groundwater with the cations Ca/Mg and the anion HCO₃ dominating (Shangoni AquiScience, 2014).

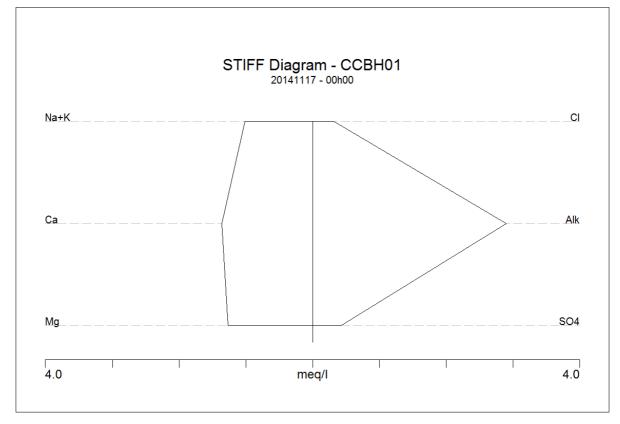


Figure 39: Stiff diagram for the rendering facility's abstraction borehole

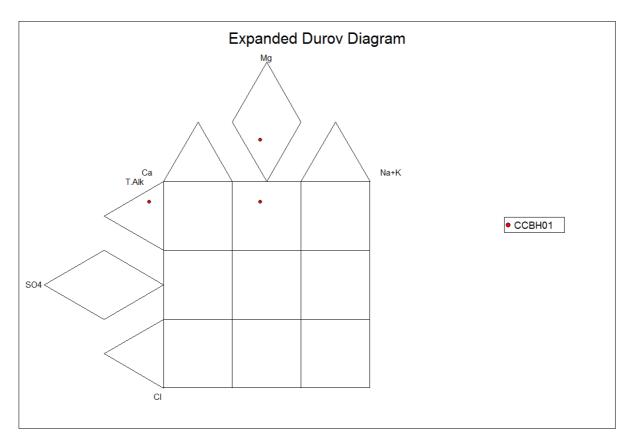


Figure 40: Expanded Durov diagram for the rendering facility's abstraction borehole

2.9.5 Storage of water

Groundwater abstracted on an adjacent property (Portion 0 of the farm Vogelzang 467 IQ), owned by Chubby Chick/Cycle City, and pumped to the rendering facility is stored there in five (5) 5 000 litre JoJo tanks. The total amount of water stored at the rendering facility is therefore 25 000 litres at any one time.

2.9.6 Groundwater quantity

Currently, there are no major groundwater abstraction projects in the C23L quaternary catchment. Small abstractions are most probably utilised for livestock watering and domestic use. The exploitation potential for this catchment is therefore quite substantial, equalling to approximately 12Mm³/a (Shangoni AquiScience, 2014).

2.10 Wastewater

Currently, approximately 55m³ of wastewater is generated at the rendering facility per day. The wastewater currently flows into trenches/earthen canals and a sump and is then pumped to an earth evaporation dam to the north-east of the rendering facility. Overflow from the earth evaporation dam occurs towards a trench/earthen canal from where it either undergoes further evaporation or leaches into the ground.

A French drain has been constructed on site for the management of sewage, but is not yet operational. As a result, sewage is currently also discharged into the wastewater reticulation system.

A sample of the rendering facility process wastewater was sent for chemical, organic and bacteriological analysis and evaluated against the following:

- General Limit standard for wastewater discharge as per Section 21(f and h) of the National Water Act (NWA), 1998 (Act No. 36 of 1998) (refer to Table 13); and
- General Limit standard for wastewater discharge as per Section 21(e) of the National Water Act (NWA), 1998 (Act No. 36 of 1998) (refer to Table 14).

The levels of iron (Fe), total ammonia (NH₃ + NH₄), organic nitrogen, phosphate (PO₄), fluoride (F), *E.coli*, chemical oxygen demand (COD), suspended solids (SS) and soap-oil-grease (SOG) in the wastewater exceeded the General Limit standards for wastewater discharge as per Section 21(f and h) of the National Water Act (NWA), 1998 (Act No. 36 of 1998). The process wastewater is therefore not allowed to be discharged into the environment or allowed to overflow in its current state under the General Authorisations and should be kept within a dirty water circuit.

The levels of electrical conductivity (EC), faecal coliforms, COD and the sodium adsorption ratio (SAR) in the process wastewater were found to exceed the General Limit for wastewater irrigation as per Section 21(e) of the National Water Act (NWA), 1998 (Act No. 36 of 1998). The wastewater may therefore not be utilised for any type of irrigation purposes in its current form under the General Authorisations.

The wastewater quality is indicative of very high organic loads subjected to organic breakdown, mixed with sewage (Shangoni AquiScience, 2014).

Improvements are proposed to manage wastewater generated at the rendering facility more efficiently. The installation of feather presses at the abattoirs that supply waste to the rendering facility will decrease the moisture content of incoming waste at the rendering facility. This will, in turn, decrease the amount of wastewater generated through the rendering process from ±55m³ to ±20m³ of wastewater per day. This reduction in volume has removed the need for a wastewater treatment works and the installation of a collection tank for the wastewater is more feasible and cost effective. The wastewater will be removed from the collection tank on a daily basis and disposed at the municipal sewage treatment works. Grey water from the showers will also feed into this wastewater collection tank. Sewage from the rendering facility will be contained in a separate conservancy tank and will be taken offsite on a weekly basis for disposal at the municipal sewage treatment works.

Table 13: Effluent quality evaluated according to the General Limit for discharge into a water resource	
(Shangoni AquiScience, 2014)	

Locality / Guideline Parameter	Unit	General Limit	CCeffl.
pH	_	5 - 9.7	8.55
Electrical conductivity (EC)	mS/m	≤150	966
Total dissolved solids	mg/l	-	6895
Calcium (Ca)	mg/l	-	3.63
Magnesium (Mg)	mg/l	-	3.64
Sodium (Na)	mg/l	-	82.4
Potassium (K)	mg/l	-	65.7
Total alkalinity (M-ALK)	mg/l	-	5742
Chloride (Cl)	mg/l	-	271
Sulphate (SO ₄)	mg/l	-	593
Aluminium (Al) ¹	mg/l	-	0.035
Iron (Fe) ¹	mg/l	0.3	1.24
Manganese (Mn) ¹	mg/l	0.1	-0.001
Arsenic (As) ¹	mg/l	0.02	<0.007
Cadmium (Cd) ¹	mg/l	0.005	<0.001
Chromium VI (Cr ⁶⁺) ¹	mg/l	0.05	<0.001
Copper (Cu) ¹	mg/l	0.01	<0.001
Cyanide (CN ⁻) ¹	mg/l	0.02	<0.01
Lead (Pb) ¹	mg/l	0.01	<0.001
Manganese (Mn) ¹	mg/l	0.1	<0.001
Mercury (Hg) ¹	mg/l	0.005	<0.007
Selenium (Se) ¹	mg/l	0.02	<0.007
Zinc (Zn) ¹	mg/l	0.1	0.098
Boron (B) ¹	mg/l	1	0.42
Nitrate + Nitrite (NO ₃ + NO ₂)	mg N/l	15	5.34
Total ammonia (NH ₃ + NH ₄)	mg N/I	6	1793
Kjeldahl N	mg N/I	-	1550
Total nitrogen	mg N/I	-	1798
Orthophosphate (PO ₄ -P)	mg P/I	10	41.2
F	mg/l	1	13.5
Tot Hardness	mg/l	-	24
SAR	ratio	-	7.3
Total coliforms	cfu/100 ml	-	>100 000
E.coli	cfu/100 ml	0	>100 000
Chemical Oxygen Demand (COD)	mg/l	75	21418
Suspended solids (SS)	mg/l	25	1750
Soap-oil-grease (SOG)	mg/l	2.5	99.5
DWA classification			Unacceptable Class 4

¹ Dissolved species

Values highlighted in red indicate parameters of concern



Parameter	Unit	2000 m ³ /d	500 m³/d	50 m³/d	CCeffl.
рН		5.5-9.5	6.0-9.0	6.0-9.0	8.55
EC	mS/m	150	200	200	966
F	mg/l	1	-	-	13.5
NO ₃ +NO ₂ (N)	mg/l	15	-	-	5.34
NH4-N	mg/l	3	-	-	1793
SOG	mg/l	2.5	-	-	99.5
F. coliforms	cfu/100 ml	1000	100 000	100 000	>100 000
SS	mg/l	25	-	-	1750
COD	mg/l	75	400	5000	21418
SAR	mg/l	-	5	5	7.3

 Table 14: General wastewater limits per volume irrigation water (Shangoni AquiScience, 2014)

2.11 Water Use Licensing

An integrated Water Use License application will be submitted to the Department of Water Affairs for the following water use license activities:

- Section 21(b): Storage of clean water: Storage of abstracted groundwater in the JoJo tanks;
- Section 21(c): Impeding or diverting the flow of water in a watercourse: The entire rendering facility operation is located within 500 metres of a drainage line and wetland;
- Section 21(g): Disposing of waste in a manner which may detrimentally impact on a water resource: Storage of wastewater in the proposed wastewater collection tank; and
- Section 21(i): Altering the bed, banks, course or characteristics of a watercourse: The entire rendering facility operation is located within 500 metres of a drainage line and wetland.

Water uses not requiring licensing – Abstraction of Groundwater

According to the GN 399 General Authorisations, dated 26 March 2004, in terms of Section 39 of the NWA, 1998 (Act No. 36 of 1998), a person who takes more than 50 cubic meters of water from a surface water resource or 10 cubic meters of water from a groundwater resource on any given day must register the water use with the responsible authority. As $\pm 55m^3$ of groundwater is abstracted per day for use at the rendering facility, a Water Use Registration is required.

According to the GN 399 General Authorisations, dated 26 March 2004, a person who owns or lawfully occupies property registered at the Deeds Office at the date of the notice may on that property or land take groundwater as set out in Table 1.2, outside the areas set out in paragraph 1.2.

According to Table 1.2 of GN 399 General Authorisations, dated 26 March 2004, 75m³ of water per hectare per year may be taken from quaternary catchment C23L. The property from which groundwater is abstracted (Portion 0 of the farm Vogelzang 467 IQ) is 825.3ha in size. This means that under the General Authorisations, 61 897.5m³ of groundwater may be abstracted on the property per annum. This equates to 169.58m³ of groundwater that may be abstracted per day. As only ±55m³ is abstracted per day for use at the rendering facility, a license in terms of Chapter 4 of the National Water Act, 1998 (Act No. 36 of 1998) is therefore not required.

A Water Use License and Registration Application will be submitted to the Department of Water and Sanitation in due course.

2.12 Sensitive landscapes

The majority of the site (rendering facility) and property has been disturbed. Apart from the rendering facility, the property is used for crop production and is therefore in a disturbed state.

2.12.1 Wetlands

A Wetland Delineation and Functional Assessment of the project property was conducted by Limosella Consulting in February 2015. The following is an extract of the findings of their investigation.

All wetlands within a 500m radius from the rendering facility were delineated and assessed, as required by the National Water Act, 1998. Only one wetland, a hillside seep, was found and delineated 250m downslope (west and north-west) of the rendering facility. The wetland is shown in Figure 41 and is situated within the cultivated foot-slope (cultivated field of maize and sorghum) draining northwards into the Wilgeboomspruit. The rendering facility and its existing wastewater dams and drains do not directly encroach onto the wetland or its 50m buffer. The proposed wastewater collection tank will also not encroach into the wetland or its 50m buffer.

The combined PES (Present Ecological State) of the seep is a D↓ (largely modified), meaning that a large change in ecosystem processes and loss of natural habitat and biota has occurred. The modifications have been due to the following:

- The historical cultivation of croplands;
- Changes in the catchment hydrology and soil loss; and
- The addition of alien invasive plants into the system.

The EIS (Ecological Importance and Sensitivity) score of 1.3 indicates that the seep has a moderate ecological importance and sensitivity. Such wetlands are ecologically important and sensitive on a provincial or local scale. The biodiversity of these wetlands are not usually sensitive to habitat and flow modifications (Limosella Consulting, 2015).

2.12.2 Critical Biodiversity Areas

According to the South African National Biodiversity Institute's Biodiversity GIS database, the property lies across two Critical Biodiversity Areas in terms of the North West Province Critical Biodiversity Assessment. The rendering facility itself lies within Critical Biodiversity Area 2 (refer to Figure 42).



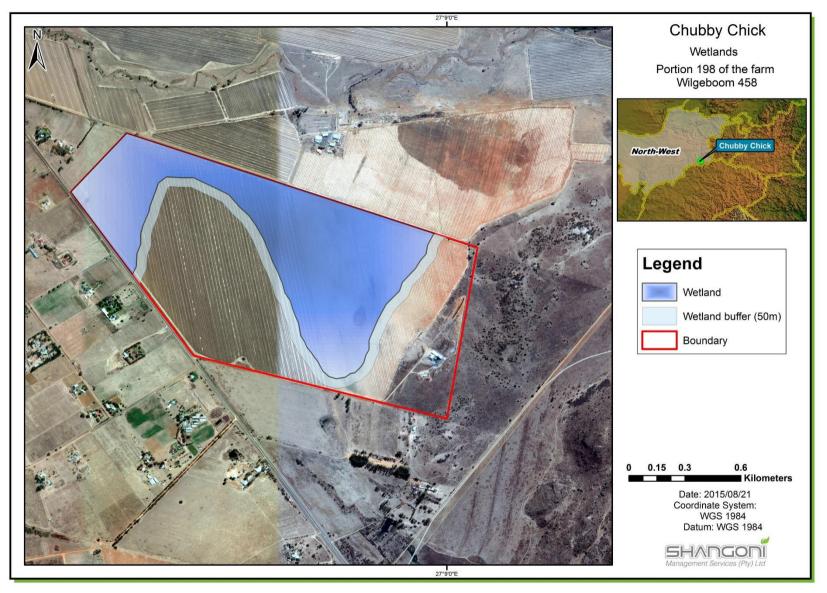


Figure 41: The wetland and wetland buffer in relation to the rendering facility.

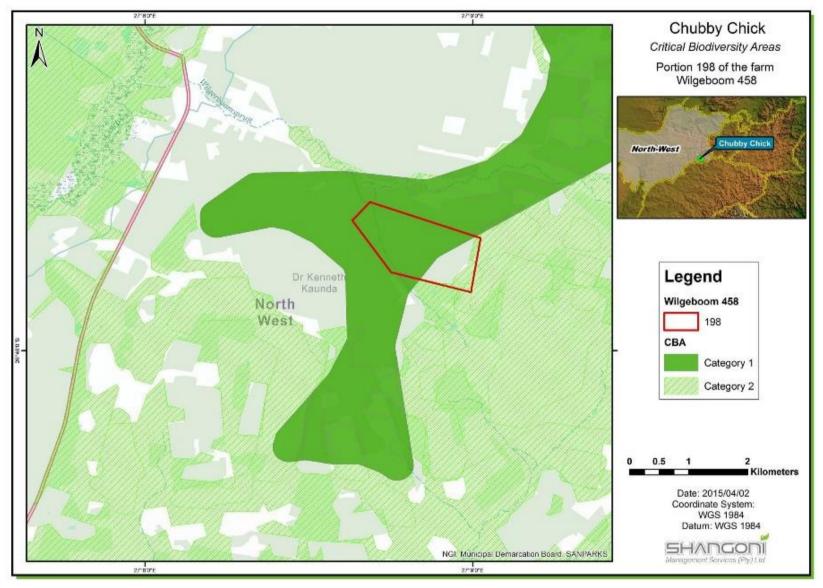


Figure 42: Critical Biodiversity Area Map (SANBI, 2007)

2.13 Sites of archaeological and cultural interest

The South African Heritage Resources Agency (SAHRA), in their letter dated 21 September 2015, requested that a Phase 1 Heritage Impact Assessment should be conducted for the proposed project. Alternatively, a heritage specialist could choose to submit a letter to SAHRA to motivate that no such assessment is required, based on the property either being small or in a disturbed state.

Anton Pelser of APelser Archaeological Consulting was appointed by the applicant to comply with the above mentioned instruction from SAHRA. Mr Pelser conducted a site visit on the 6th of November 2015 and thereafter submitted a *Letter of Exemption from further studies* to SAHRA, seeing as the area where the wastewater collection tank is to be constructed is very small and in a severely disturbed state.

In a letter dated 10 February 2016, SAHRA indicated that it agrees with Mr Pelser's recommendation that no further studies are required as the proposed area is very small and has been previously disturbed by human activity. SAHRA further indicated that it has no objection to the proposed development, provided that a number of conditions are adhered to, should any objects of archaeological or palaeontological remains be found during the construction activities. These conditions are included in the Environmental Management Programme for this proposed project.

2.14 Air Quality

2.14.1 Emissions and odours

The generation of odour emissions is generally the most significant air quality issue at a rendering facility (Sindt, 2006). Odours are mostly caused by volatile organic compounds (VOCs) and these are the main atmospheric emissions generated at rendering facilities. VOC emissions can be made up of all or some of the following compounds: ammonia, organic sulphides, particulates, hydrogen sulphide, trimethylamine, disulphides, quinoline, C-4 and C-7 aldehydes, C-4 amines, C-3 to C-6 organic acids, dimethyl pyrazine and other pyrazines. Small volumes of the following may also be emitted: ketones, aromatic compounds, C-4 to C-7 alcohols and aliphatic hydrocarbons. Many of the compounds have low odour detection thresholds, with some as low as one (1) part per billion (ppb). Quinoline is the only compound that is classified as a hazardous air pollutant (HAP).

Sources of odorous emissions at the rendering facility include:

- Steam from the pressure cooker vessels;
- Fugitive emissions from the working environment, such as:
 - Biological degradation of raw material (e.g. waste intake and storage area);
 - Vapour leaks from machinery (e.g. blood tank); and
 - Current wastewater treatment facilities (e.g. earth evaporation pond).

Unit processes responsible for the most offensive odours at the rendering facility include the following:

- Waste intake and storage area;
- Blood tank;
- Pressure cooking vessels;
- Sump; and
- Current wastewater treatment facilities (trenches/earthen canals, wastewater sump and earth evaporation pond).

Unit processes that generate less offensive odours include the following:

- The milling and screening of cooked material; and
- The bagging, storage and dispatch of product.

Other emissions generated at the rendering facility include:

- Combustion emissions from the coal-fired boilers. Coal-fired boilers produce suspended particulate matter; ammonia; nitrogen and sulphur oxides; greenhouse gases (Sindt, G.L., 2006) and may also produce VOCs (Midwest Research Institute, 1995);
- Dust generated from vehicles traveling on site as well as the incorrect disposal of ash from the coal-fired boilers; and
- Electricity usage at rendering facilities tends to be high. This usage results in indirect emissions (Scope 2 emission) from the generation of electricity at the power stations.

Water vapour from the cooking vessels is condensed in the condenser and non-condensibles, such as VOCs (volatile organic compounds), pass from the condensers to the biofilter. In the biofilter, the air passes through a biofilter medium within which microorganisms reside. The odour causing particles are a food source for the microorganisms and are therefore consumed by the microorganisms. In this system, the odourous atmospheric emissions generated at the rendering facility (during the cooking process) are captured and degraded (consumed).

In an Atmospheric Impact Assessment conducted for the Chubby Chick rendering facility it was determined that the current scenario would only exceed the odour benchmark (1.5 OU_E/m^3 , as a 98th percentile of hourly means over a calendar year) approximately 300m from the eastern boundary of the site. In the simulations the benchmark was not exceeded over any of the surrounding residences. Note that for this study a control efficiency of 79.8% (Sironi S *et al.*, 2007) was used. Should the biofilter not be properly maintained, it may result in an increased odour impact. Figure 43, Figure 44 and Figure 45 provide an illustration of the effect the topography and wind field have on the dispersion of the odour from the rendering facility over the surrounding land use.

Since a majority of the odour sources at the rendering facility are considered fugitive emission sources (such as the waste intake and storage area; the blood tank; the sump; the wastewater treatment facilities, the milling and screening areas; and bagging, storage and dispatch of product area), an Odour Management Plan (OMP) was compiled for the facility, as part of the Atmospheric Emission Licence

application. An OMP is a documented, operational plan describing reasonable measures to be implemented by the rendering facility manager in anticipation of the formation of odours and their release from the site.

2.14.2 Atmospheric Emission License Application for the rendering facility

An Atmospheric Emission License Application was submitted to the North West Department of Rural, Environmental and Agricultural Development for the following listed activity in terms of Government Notice No. 893 of 22 November 2013 (formerly Government Notice No. 248 of 31 March 2010) (List of activities which result in atmospheric emissions which have or may have a significant detrimental effect on the environment, including health, social conditions, economic conditions, ecological conditions or cultural heritage):

19. Category 10: Animal matter processing

Description:	Processes for the rendering cooking, drying, dehydrating, digesting, evaporating or protein
	concentrating of any animal matter not intended for human consumption.
Application:	All installations handling more than 1 ton of raw materials per day.
) The follow	ing special arrangement shall apply:

a) The following special arrangement shall apply:

 Best practice measures intended to minimise or avoid offensive odours must be implemented by all installations. These measures must be documented to the satisfaction of the Licensing Authority.

The Department (NWREAD) issued Chubby Chick Enterprises with a Provisional Atmospheric Emission Licence on the 4th of August 2015. The Provisional Atmospheric Emission Licence is valid until the 31st of August 2017.

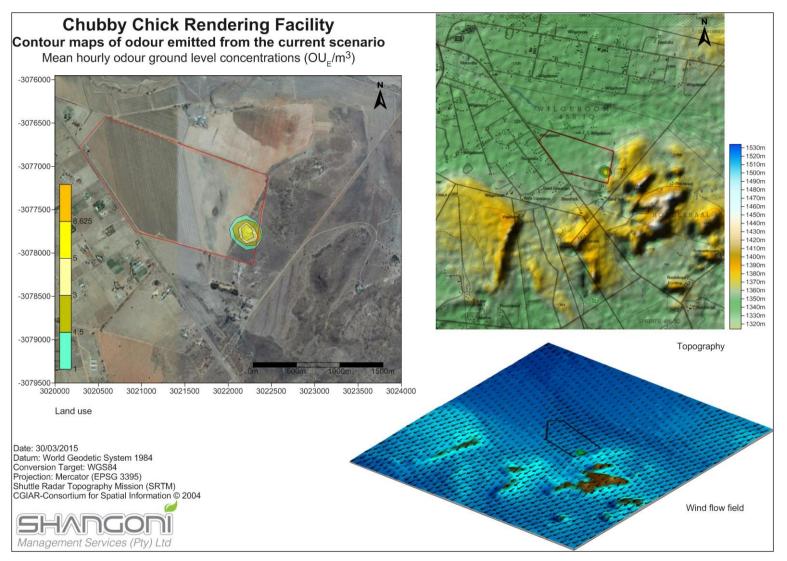


Figure 43: Mean hourly odour ground level concentrations (OUE/m3) for the current scenario.

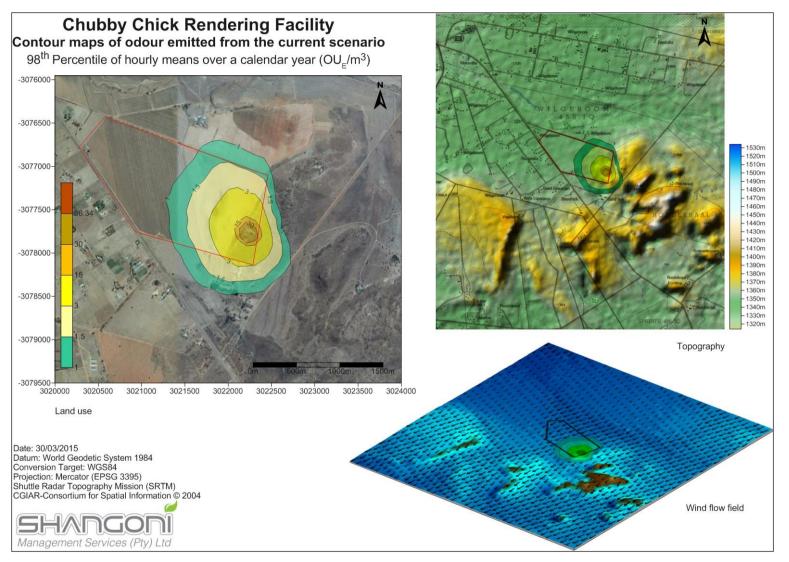


Figure 44: 98th Percentile of hourly means over a calendar (OU_E/m^3) for the current scenario.

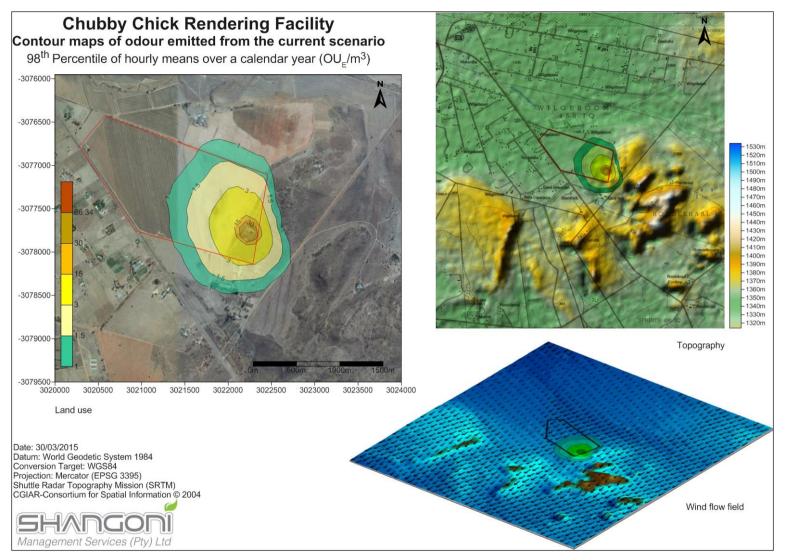


Figure 45: Exceedence of the 1.5 OU_E/m^3 odour threshold for the current scenario.

2.14.3 Noise pollution

Noise in the area is generated mainly by activities at the rendering facility, farming activities, vehicles travelling on nearby roads, such as the Schoemansdrift Road, and general bird and animal life. The main sources of noise are shown in the figure below.

Noise is currently generated at the rendering facility by the vehicles that deliver poultry waste to the facility, those that deliver coal and other raw materials and those that pick up finished product (high-protein feather meal) from the facility. Noise is also generated through the rendering activities themselves, such as at the condensers. As the facility operates 24 hours per day, noise is continually generated to varying degrees.

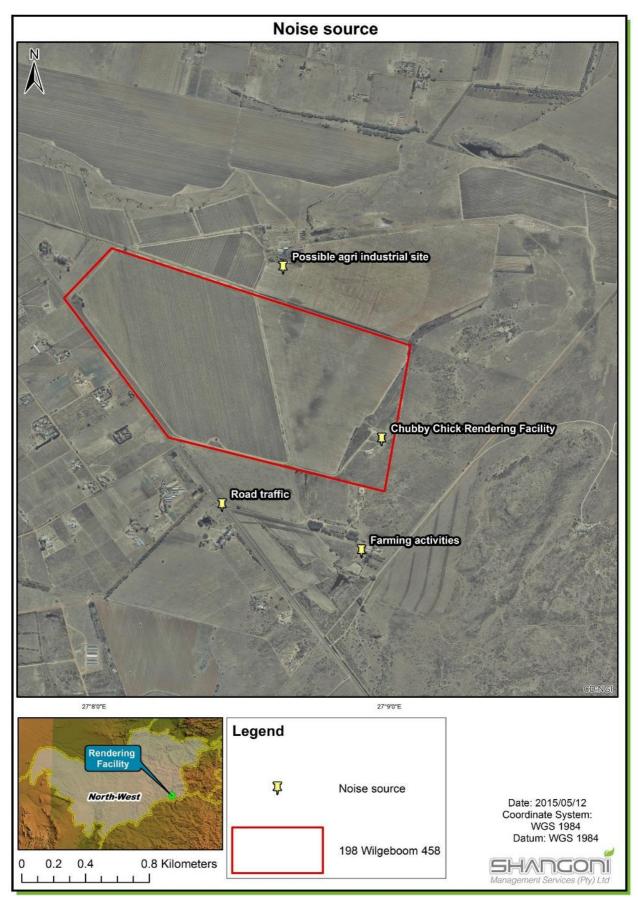


Figure 46: Main sources of noise in the area

2.15 Visual aspects

The rendering facility is visible from the main road (Schoemansdrift Road) that runs past the site, as shown in the figure below. The facility lies approximately 975 metres from this road. The rendering facility is also visible from open areas surrounding the facility, however, these surrounding properties are mostly owned by the applicant.



Figure 47: View of the site from the Schoemansdrift Road

2.16 Socio-economic aspects

The site is located within the Tlokwe City Council in the Dr. Kenneth Kaunda District Municipality.

2.16.1 Demography

According to the 2011 census, 162 762 people formed part of 52 537 households in the Tlokwe City Council. The average household size is 3.1 people per household. There are 96.6 men for every 100 women in the municipality and the table below shows the age structure of the municipality.

Table 15: Tlokwe City Council age structure -Census 2011 (Statistics South Africa, 2011).

Age Group	Percentage (%)
Under 15 years of age	25.2
15 to 64 years of age	69.1
Over 65 years of age	5.7
Total population	100

2.16.2 Major economic activities

Economic activity in the Tlokwe City Council is driven by agriculture, manufacturing, services and the business sector. The North-West University plays a large role in the provision of services (www.localgovernment.co.za/locals/view/194/tlokwe-local-municipality). The area is also known for diamond mining and the production of maize, sorghum and sunflower (Tlokwe City Council, 2012).

2.16.3 Unemployment and employment

The 2011 census found that the official unemployment rate was 21.6% and the youth unemployment rate (15 to 34 years of age) was 29.5%. The dependency ratio is 44.7 per 100 people between the ages of 15 and 64 years (Statistics South Africa, 2011).

3. APPLICABLE LEGISLATION AND GUIDELINES

The table below provides an indication of the main legislation, policies and/or guidelines applicable to the rendering facility project.

Title of legislation, policy or guideline	Administering authority	Aim of legislation, policy or guideline
	Laws of General Application	
The Constitution of the Republic of		To establish a Constitution with a Bill of
South Africa, 1996 (Act No. 108 of 1996)	-	Rights for the RSA.
Environment Conservation Act, 1989 (Act No. 73 of 1989, as amended)	North West Department of Economic Development, Environment, Conservation and	To control environmental conservation.
National Environmental Management Act, 1998 (Act No. 107 of 1998). National Environmental Management Amendment Act, 2008 (Act No. 62 of 2008).	Tourism North West Department of Economic Development, Environment, Conservation and Tourism	To provide for the integrated management of the environment, and to regulate the 'Duty of Care' Principle.
Promotion of Access to Information Act, 2000 (Act No. 2 of 2000, as amended)	-	To give effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights.
Air Quality and Noise		'
National Environmental Management: Air Quality Act (Act No. 39 of 2004)	North West Department of Economic Development, Environment, Conservation and Tourism or the Dr. Kenneth Kaunda District Municipality	To reform the law regulating air quality to protect the environment by providing reasonable measures for the prevention of pollution. To provide for national norms and standards regulating air quality monitoring, management and control.
Water Management		
National Water Act (NWA), 1998 (Act No. 36 of 1998)	Department of Water Affairs	To provide for fundamental reform of the law relating to water resources.
Waste Management		
National Environmental Management: Waste Act (Act No. 59 of 2008)	National Department of Environmental Affairs	To reform the law regulating waste management in order to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation.

Table 16: Applicable legislation, policies and/or guidelines



Title of legislation, policy or guideline	Administering authority	Aim of legislation, policy or guideline
NationalEnvironmentalManagement:Waste Act (Act No 59of 2008) – Waste Classification andmanagement regulations (GNR. 634of 23 August 2013)	National Department of Environmental Affairs	To regulate the classification and management of waste in a manner that supports and implements the provisions of the Waste Act.
Biodiversity		·
National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004)	North West Department of Economic Development, Environment, Conservation and Tourism	To provide for the management and conservation of South Africa's biodiversity within the framework of the National Environmental Management Act, 1998.
Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983)	North West Department of Agriculture and Rural Development	To provide for control over the utilisation of the natural agricultural resources of South Africa in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants.
National Veld and Forest Fire Act,	North West Department of	To reform the law on veldt and forest
1998 (Act No. 101 of 1998)	Agriculture and Rural Development	fires.
Agricultural Pest Act, 1983 (Act No. 36 of 1983, as amended) – GN R276 of 5 March 2004	North West Department of Agriculture and Rural Development	To regulate plants, plant products and other regulated articles when imported into South Africa.
Soil and Land Management National Environmental Management Act, 1998 (Act No. 107 of 1998). National Environmental Management Amendment Act, 2008 (Act No. 62 of 2008). Environment Conservation Act, 1989	North West Department of Economic Development, Environment, Conservation and Tourism North West Department of	To provide for the integrated management of the environment and to regulate the 'Duty of Care' Principle.
(Act No. 73 of 1989, as amended)	Economic Development, Environment, Conservation and Tourism	
Heritage and Archaeological Resou	rces	
National Heritage Resources Act No 25 of 1999 (Act No. 25 of 1999, as amended)	South African Heritage Resources Agency	To introduce an integrated and interactive system for the management of the national heritage resources; to promote good government at all levels, and empower civil society to nurture and conserve their heritage resources so



Title of legislation, policy or guideline	Administering authority	Aim of legislation, policy or guideline
		that they may be bequeathed to future generations
Protected Areas	Ι	
NationalEnvironmentalManagement:Protected Areas Act,2003 (Act No. 57 of 2003, asamended)	North West Department of Economic Development, Environment, Conservation and Tourism	To provide for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes.
Planning of New Activities		
National Environmental Management Act, 1998 (Act No. 107 of 1998). National Environmental Management Amendment Act, 2008 (Act No. 62 of 2008).	North West Department of Economic Development, Environment, Conservation and Tourism	To provide for the integrated management of the environment and to regulate the 'Duty of Care' Principle.
EIA Regulations R 543, R 544, R 545 and R 546, dated 18 June 2010)	North West Department of Economic Development,	To regulate and control the authorisation of certain listed activities.
under the NEMA, 1998	Environment, Conservation and Tourism	
EIA Regulations R982, R983, R984 and R985, dated 4 December 2014) under NEMA, 1998.		
Government Notice (GN) 718: "List of waste management activities that have, or are likely to have a detrimental effect on the environment", dated 2009.	National Department of Environmental Affairs	To regulate and control the authorisation of certain waste-related listed activities.
Government Notice (GN) 921: "List of waste management activities that have, or are likely to have, a detrimental effect on the environment", dated 2013.		

4. PUBLIC PARTICIPATION PROCESS

4.1 Objectives of the Public Participation Process (PPP)

Section 24 of the Constitution of the Republic of South Africa of 1996 guarantees everyone the right to an environment that is not harmful to their health and well-being and to have the environment protected for the benefit of present and future generations. In order to give effect to this right, the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998) came into effect.

In terms of Section 24(4) of NEMA, 1998 and 2008 (as amended), procedures for the investigation, assessment and communication of the potential consequences or impacts of activities on the environment must, *inter alia*, ensure, with respect to every application:

- Coordination and cooperation between organs of state in the consideration of assessments where an activity falls under the jurisdiction of more than one organ of state;
- That the findings and recommendations of an investigation, the general objectives of integrated management laid down in NEMA, 2008, and the principles of environmental management set out in Section 2 of NEMA, 2008, are taken into account in any decision made by the organ of state in relation to any proposed policy, programme, process, plan or projects, consequences or impacts; and
- Public information and participation procedures that provide all integrated and affected parties, including all organs of state in all spheres of government that may have jurisdiction over any aspect of the activity, with a reasonable opportunity to participate in those information and participation procedures.

One of the general objectives of integrated environmental management stipulated in Section 23(2)(d) of NEMA, 2008, is to: "ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment."

The National Environmental Management Principles as stipulated in NEMA, 2008, state that;

- "Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.
- The participation of all interested and affected parties in environmental governance must be promoted, and all people must have an opportunity to develop the understanding, skills and capacity necessary to achieve equitable and effective participation, and participation by vulnerable and disadvantage persons must be ensured".

4.2 Legislation and guidelines followed for the PPP

The public participation process for this project was conducted by Shangoni Management Services in terms of:

- The procedures and provisions in terms of the NEMA (as amended), 2008, and NEMWA, 2008;
- Chapter 6 of the EIA Regulations of 2010;
- GN 807, Public Participation Guideline in the Environmental Impact Assessment Process, dated October 2012; and
- Other relevant legislation such as the Promotion of Access to Information Act (PAIA), 2000.

Refer to Appendix E for an extract regarding the required public participation process to be followed, taken from the relevant legislation and guidelines.

4.3 Public Participation Process followed

4.3.1 Identification and registration of I&APs and key stakeholders

The table below lists the adjacent landowners identified and notified (via hand delivery of letters) of the project. Copies of the notifications to I&APs have been included in Appendix E.

Property owner	Address or property description
F.D. Grimbeek	Portion 6 Wilgeboom
Herman Pretorius	Portion 50 Wilgeboom
J.P. Moolman	Holding 51A Wilgeboom
A.B. Hill	Portion 177 Wilgeboom
P.M. Fouché	Holding 52 Wilgeboom

Table 17: List of adjacent landowners identified and notified

All organs of state that may have jurisdiction in respect of the proposed project are considered to be registered I&APs.

The following organs of state were notified of the proposed project:

- Tlokwe City Council;
- Dr. Kenneth Kaunda District Municipality;
- North West Department of Agriculture and Rural Development (now the North West Department of Rural, Environmental and Agricultural Development);
- South African Heritage Resources Agency (SAHRA); and
- Department of Water and Sanitation (formerly the Department of Water Affairs).

Copies of the notifications to the organs of state have been included in Appendix E, and examples are included in the figures below. Proof of postage of the Notification Letters is given in Figure 50 and proof of the Notification Letters uploaded to SAHRIS is shown in Figure 51.



Shangoni Management Services Pty (Ltd) Reg: 2002/000002/07 VAT: 489 019 1069

Tel +27(0)12 807 7036 Fax +27(0)12 807 1014 E-mail info@shangoni.co.za www.shangoni.co.za Block C8, Block@Nature 472 Botterklapper Street The Willows 0081 PO Box 74726 Lynnwood Ridge 0040

23 January 2013

NWDEDECT EIA Ref: NWP/EIA/62/2013; DEA EIA Ref: 12/9/11/L1392/7; SMS Ref: FOU-POT-12-05-02

South African Heritage Resources Agency (SAHRA) PO Box 4637 Cape Town

Attention: Mr. Phillip Hine

8000

NOTIFICATION OF APPLICATION FOR ENVIRONMENTAL AUTHORISATION: CHUBBY CHICK RENDERING FACILITY: APPLICATION FOR ENVIRONMENTAL AUTHORISATION AND WASTE MANAGEMENT-, WATER USE- AND ATMOSPHERIC EMISSION- LICENSES

The Cycle City (Pty) Ltd. (trading as Chubby Chick Enterprises) rendering facility is situated on Portion 198 of the farm Wilgeboom 458 IQ, North West Province. The operation requires environmental authorisation as well as the following licenses: A Waste Management License in terms of section 19 and 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), a Water Use License in terms of Chapter 4 of the National Water Act, 1998 (Act No. 36 of 1998) and an Atmospheric Emission License in terms of section 21 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004).

The rendering facility will require environmental authorisation subject to a full Scoping and Environmental Impact Assessment Process as required by Sections 26 to 35 of Government Notice R. 543 of the EIA Regulations of 18 June 2010.

Shangoni Management Services (Pty) Ltd. was appointed as the Independent Environmental Assessment Practitioner (EAP) responsible for the Scoping and Environmental Impact Assessment process. Shangoni has submitted, on behalf of Cycle City (Pty) Ltd. (T/A Chubby Chick Enterprises), an application for environmental authorisation to the North West Department of Economic Development, Environment, Conservation and Tourism for atmospheric emission- and water use- license activities. An application for a waste management license has also been submitted to the National Department of Environmental

Directors RB Hayes J Nel JA van Rooy CJ Potgieter HL de Villiers

Figure 48: Example of the notification letters sent (page 1)

Affairs. An atmospheric emission license application will be submitted to the relevant authority and a water use license application will be submitted to the Department of Water Affairs.

Attached please find a background information document, locality map of the site, and a stakeholder registration form in respect of the application. Should you wish to register as an Interested and Affected party for the above mentioned project, please complete the attached stakeholder registration form and send it to us before or on the <u>3rd of March 2014</u>. Should you wish to not be part of this EIA process, it will be appreciated if we could receive a written confirmation thereof to enable us to continue with the application.

Please do not hesitate to contact the undersigned should you require any additional information.

Contact Details: Shangoni Management Services Miss Lizette Crous E-mail: lizette@shangoni.co.za Fax 2 E-mail: 086 643 5360 Fax: 012 807 1014 Online Participation: Go to www.shangoni.co.za and click on Public Documents.

Regards,

Lizette Crous Environmental Assessment Practitioner

Figure 49: Example of the notification letters sent (page 2)

List of REGISTERED LETTER Lys van GEREGISTREERDE I (with an insurance option/met 'n Full tracking and tracing/Volledig					Post Office	
Name and address of sender: Shangoning Naam en adres van afsender: Shangoning Ser vices (PLJ) Ltd. PO Box Lynwood lidge 0040 Lizette Grouss	1	≥me∩t ZG	- 	T	Enquiries/Navrae Foll-free number Tolvry nommer 1800 111 502	
Name and address of addressee No Naam en adres van geadresseerde	Insured amount Versekerde bedrag	Insurance fee Verseke- ringsgeld	Postage Posgeld	Service fee Diensgeld	Affix Track and Trace customer copy Plak Volg-en-Spoor- kliëntafskrif	
RO Box 113, Potchefstroo	neter Mr. A	2520	chogr erou	re	REGISTERED LETTER futtion a dromostic insurance onthon there can let of 11 size ware account RD 856 131 613 ZA CUSTOMER COPY 301028R REGISTERED LETTER (with a dromostic insurance ontion) Starticula (350 pc 2.33	/
2 Tokwe City Council - Ward C. PO Box 113, Potchefsbrood 3 South African Hentege Cexance RO Box 4637, Cane Town	n Igency sat	ZSZ (SAHPA)	n - 1	hlip ne -	RD 856 131 785 ZA CUSTOMER COPY 301028R REGISTERED LETTER With a domasic harmano called Standard Station Stationer Control RED 856 131 797 ZA	1 1
	and Rura	Dr	pment Kgabi n Ch Lef	- Le	REGISTERED LETTER REGISTERED LETTER Swordard 300 711 302 www.aspic.co.as RD 856 1.31 763 Z.A CUSTOMER COPY 301038R REGISTERED LETTER Write a openable dataware optical) Sharefall 6810 719 502 www.spic.or.as RD 856 1.31 7.50 Z.A	/
 Private Bag X SOIT, Klertsdon Br. Kenneth Kaundo Dobrict Municip Private Bag X 5017, Klertsdon 	cliby,	570 Vubo 570	mi N	dlow	CUSTOMEF COPY 301023R REGISTERED LETTER Start Coll #010 111 022 wow.sapces.as RD 856 131 746 ZA CUSTOMEF COPY 301021R	/
Private Bag X 995, Pretorie	. 0	oonsible	Hellen Makw Air Qu		REGISTERED LETTER With a Space 16 fib. Internation optimity BD 856 I 31 732 ZA CUSTOMER COPY 301028R REGISTERED LETTER With a second Backage optimity IND 856 I 31 GOV	
8 Private Bag X 5017, Klerkador 9			ficer	7	CUSTOMER COPY 301028R	
10	-			ki ^{de}		
Number of letters posted Getal briewe gepos Signature of client	IR	R	R	R		
Signature of accepting officer Handtekening van aanneembeampte				-	Date stamp	
The value of the contents of these letters is as indicated and compensation unconditionally. Compensation is limited to R100,00. No compensation Optional insurance of up to R200,00 is available and applies to domestic re Die waarde van die inhoud van hierdie briewe is soos aangedui en vergoo	is payable wit gistered letter	hout docume s only.	ntary proof.	13	SHILLS	
sonder voorbehoud ontvang word rie. Vergoeding is beperk tot R dokumentere bevys betaalbaar nie. Opsionele versekering van tot R2 binnelandse geregistreerde briewe vantoepassing.	100.00. Geel	n vergoeding	is sonder	JAN ZUN		
MASIQHAME PRINTERS					701248	

Figure 50: Proof of Postage of Notification Letters

	LocationInfo	Admin	Images				
Status: DF	RAFT						
UoritanoAut	hority(s): SAHR/	A					
-	Section 38 (8) - S		nument Descrive	2			
	and the first		nment Require	iu i			
Developmei	nt Type <mark>: Industria</mark>						
Wilgeboom 4 licenses: A V Act, 2008 (A 1998) and ar	158 IQ, North Wes Vaste Manageme ct No. 59 of 2008) Atmospheric Em ct No. 39 of 2004)	st Province. nt License ir), a Water Us nission Licen	The operation terms of secti se License in t	requires envir on 19 and 20(erms of Chapt	onmental aut b) of the Nati er 4 of the Na	norisation as we onal Environmer tional Water Ac	on 198 of the farm II as the following ntal Management: Waste t, 1998 (Act No. 36 of anagement: Air Quality
CaseID: 461 Applicants:	Cycle City (Pty) L /Experts: Lizette	td trading a					
CaseID: 461 Applicants: Consultants OtherRefere	3 Cycle City (Pty) L /Experts: Lizette nces:	td trading a		k Enterprises	DueDate	FinalDec	cision
CaseID: 461 Applicants: Consultants OtherRefere	3 Cycle City (Pty) L /Experts: Lizette inces: Case	td trading as Crous	s Chubby Chic	k Enterprises	DueDate	FinalDec	cision
CaseID: 461 Applicants: Consultants OtherRefere Dept	3 Cycle City (Pty) L (Experts: Lizette ences: Case NWP	td trading as Crous Reference	s Chubby Chic	k Enterprises	DueDate	FinalDec	cision
CaseID: 461 Applicants: Consultants OtherRefere Dept DEDECT	3 Cycle City (Pty) L /Experts: Lizette ences: Case NWP 12/9/	td trading as Crous Reference P/EIA/62/201	s Chubby Chic	k Enterprises	DueDate	FinalDec	cision

Figure 51: Proof of Uploading the Notification Letters to SAHRIS

4.3.2 Methods of notification

4.3.2.1 Advertisement(s)

The proposed project was advertised in two local newspapers namely, the Potchefstroom Herald on 24th of January 2014 and the Beeld newspaper on the 23rd of January 2014. These newspapers were found to be the most appropriate newspapers in terms of their accessibility to I&APs. Copies of the advertisements and proof of their placement is attached in Appendix E and is also given in the figures below.

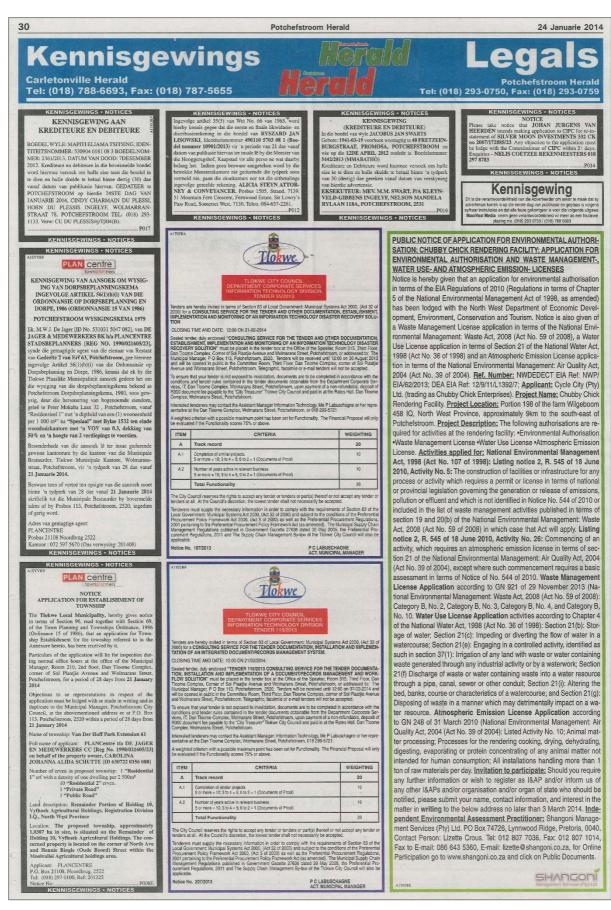


Figure 52: Proof of advertisement placement in the Potchefstroom Herald newspaper



Figure 53: Proof of advertisement placement in the Beeld newspaper

Shangoni Management Services (Pty) Ltd

4.3.2.2 Placement of site- and public notices

Notice was also given to Interested and Affected Parties via the placement of notice boards. Notice boards were placed at two different, noticeable and conspicuous places (at the access road to the facility as well as on the fence of the facility itself) on the 23rd of January 2014. Photographs of the site notices are attached in Appendix E. Refer also to the figures below.



Figure 54: Site Notice 1



Figure 55: Site Notice 1 (zoomed in)



Figure 56: Site notice 2

4.3.2.3 Background Information Document

Notification Letters and the Background Information Document (BID) developed for the proposed project provides background information pertaining to the project and are intended to inform I&APs of the proposed project. The BID also includes a registration form that potential I&APs, stakeholders and organs of state are encouraged to complete in order to register as I&APs for the project.

The notification letters and the BID were made available to all landowners adjacent to the proposed site, as well as to all organs of state that may have jurisdiction over any aspect of the activity. This correspondence was sent via registered mail, email and hand delivery where required. The BID will also be made available to any other person who becomes involved in the on-going Public Participation Process.

Copies of the notification letters and the BID and proof of their distribution to the adjacent landowners and organs of state have been attached under Appendix E. Proof of postage of the notification letters is given in the figures below. Further proofs are also attached under Appendix E.

4.3.3 I&AP register

Once all adjacent landowners, organs of state and the public were notified of the proposed project, an I&AP register was compiled. The Departments and Organs of State have automatically been registered and where registration requests were received from other parties, such as adjacent land owners, these have been included in the register. The register is given in the table below and is also attached in Appendix E.

No.	Name	Department / Interest
Organ	s of State	
1	Ms Ntombi S. Rikhotso	Tlokwe City Council - Environmental Management Unit
2	Faith Lephale, Vutomi Ndlovu, T.M. Ramatlhape- Tsotetsi, Nokukhanya Xaba and Zamisile Mabaso	Dr. Kenneth Kaunda District Municipality
3	HOD: Dr Kgabi Mogajan	North West Department of Agriculture and Rural Development
4	Mr. Phillip Hine Ragna Redelstorff	South African Heritage Resources Agency (SAHRA)
5	Hellen Makwela	Department of Water Affairs
Regist	ered I&APs	
1	M.M. Coetzee	Adjacent land owners and/or living in close proximity to the site
2	Mrs Nelien Kleynhans	Adjacent land owners and/or living in close proximity to the site
3	Mr Johannes P.S. Gerber	Adjacent land owners and/or living in close proximity to the site
4	Mrs Martha Jan	Adjacent land owners and/or living in close proximity to the site

Table 18: Registered I&APs

No.	Name	Department / Interest
5	Mr Eddie Wentzel	Adjacent land owners and/or living in close proximity to the site
6	Mr Edwin D. Lovering	Adjacent land owners and/or living in close proximity to the site
7	Mrs Bessie E. van Burick	Adjacent land owners and/or living in close proximity to the site
8	Mr Pieter and Mrs Jacolien du Plooy	Adjacent land owners and/or living in close proximity to the site
9	Mr Gerhard J. Nel	Adjacent land owners and/or living in close proximity to the site

Refer also to Appendix E for a detailed I&AP Register including contact information for all registered organs of state and I&APs.

4.3.4 Public meeting(s)

No public meetings have been held, nor is one anticipated at this stage.

4.3.5 Access and opportunity to comment on written submissions

4.3.5.1 Scoping Report

The draft Scoping Report was made available to the public for review for a period of fourty (40) days, from 27 May to 14 July 2014. A review period of 60 days, from the 27th of May to the 4th of August 2014, was given to the Department of Water Affairs. An electronic copy of the draft Scoping Report was also posted on the Shangoni Management Services' website (www.shangoni.co.za) for public comment for the same review period of fourty days.

All the registered I&APs were notified of the availability of the draft Scoping Report for public review by 27 May 2014. The I&APs were also informed to submit any comments to Shangoni Management Services by no later than 14 July 2014.

4.3.5.2 Environmental Impact Assessment Report

Similar to the Scoping Report, the draft EIA and EMP were made available to the public for review for a period of fourty (40) days, from the 8th of September 2015 to the 19th of October 2015. An electronic copy of the draft EIR and EMP was also be placed on the Shangoni Management Services' website (www.shangoni.co.za) for public comment for the same review period of fourty days. The reports were provided to the Department of Water and Sanitation as hard copies for their review and commenting, for a period of 60 days, from the 8th of September 2015 to the 9th of November 2015.

All comments received from the public have been incorporated and addressed in Table 19 below.

4.3.5.3 Environmental Impact Assessment Report

The Environmental Impact Assessment Report was revised as the project description changed significantly. The revised EIA Report and EMP were made available to the public for review for a period of fourty days, from the 16th of March 2016 to the 29th of April 2016. An electronic copy of the EIA Report and EMP was also posted on the Shangoni Management Services' website (www.shangoni.co.za) for public comment for the same review period of fourty days. The reports were provided to the Department of Water and Sanitation as hard copies for their review and commenting, for a period of 60 days, from the 16th of March 2016 to the 20th of May 2016.

All additional comments received from the public have been incorporated and addressed in Table 19 below.

4.3.6 Consultation with the relevant Authorities

4.3.6.1 Application form in terms of the NEMWA, 2008

The Waste Management License application form in terms of NEMWA, 2008, was submitted to the National Department of Environmental Affairs on the 7th of November 2013. A reference number (12/9/11/L1392/7) was issued by the Department on the 25th of November 2013.

4.3.6.2 Authorities meeting(s)

No meetings with the National Department of Environmental Affairs have been required thus far.

4.3.7 Further consultation with relevant Authorities

No meetings or consultation with the National Department of Environmental Affairs is presently foreseen.

4.3.8 Comments and responses

All issues, comments and questions received from I&APs thus far have been summarised in the table below. Copies of the comments received have also been included in Appendix E.

Table 19: Comments and responses report

Name	Company/ Department	Date received	Method of comment	Issue raised	Response
M.M.	PlanServ Town	10-02-2014	Fax	RE: ENVIRONMENTAL AUTHORISATION -	Response from Shangoni:
Coetzee	& Regional			PORTION 198 OF THE FARM WILGEBOOM 458	Dear Mrs Coetzee
	Planning			I.Q.	
	Services				Your letter dated 10 February 2014 refers: We
				The above mentioned as well as the site notice	hereby acknowledge receipt of your letter and
				placed on the above mentioned property have	comments in relation to the following project:
				reference.	Chubby Chick Rendering Facility (NWDEDECT Ref:
					NWP/EIA/62/2013; DEA Ref: 12/9/11/L1392/7;
				My husband owns Potion 173 of the farm	SMS Ref: FOU-POT-12-05-02).
				Wilgeboom 458 I.Q and we also reside on the	
				property. We are very concerned about the air	Your comments will be included in all subsequent
				quality in the area. We are located approximately	reports for this project and will also be addressed in
				1.96km from the rendering plant and the smell is	said reports. I further confirm that you have been
				unbearable some days.	registered as an Interested and Affected Party for
					this project. You will henceforth receive all
				We are not against the land use in principle but	correspondence regarding public participation
				request that proper odour control is carried out in	opportunities as the process unfolds.
				order to accommodate the residents in Wilgeboom	
				area. The area consist mainly of agricultural	Please do not hesitate to contact me should you
				holdings, but some other land uses such as a	have any queries.
				wedding venue (located approximately 1.5km from	
				the rendering plant), can also be found in the area.	Response from the applicant:
				Surely, the odours don't have a positive effect on the	RE: CHUBBY CHICK RENDERING PLANT
				businesses and living quantity.	
					The letter received from MM Coetzee refers.

Name	Company/ Department	Date received	Method of comment	Issue raised	Response
				I herewith request to be listed as an affected party	We emperied on opported prejects to comply with
				and be informed of steps to be taken to resolve the odour problem.	We embarked on several projects to comply with environmental legislation.
				Your urgent attention and reply will be appreciated.	One of the projects is to upgrade the air scrubbing system with new technology. The present scrubber will be replaced with a bio-filter system. This filter system proved itself in other areas as very successful.
					A contract has been concluded and the replacement/upgrading must be concluded by the 10th of March 2014.
					We are confident that the up-grade will be beneficial
					to us as well as our neighbours.
Hellen	Department of	24-03-2014	Email	Good afternoon Lizette.	Response from Shangoni:
Makwela	Water Affairs				Good day Hellen
				Reference: Environmental Application for: Chubby	
				Chick Rendering Facility: Water Use.	The abstraction of water for use at the Chubby Chick Rendering Plant requires a Registration of the
				Regarding the water use licence Application to be	Water Use, but falls under the General
				forwarded to the Department: DWA it is indicated	Authorisations. The 21(a) water use will, however,
				the water uses in terms of the National Water Act,	be discussed in the Water Use License application
				NWA 36 of 199 as section 21 (b), (c), (e), (f), (g) and	for this project.
				(i) respectively but have however not indicate your	

Page 108	3 of 168
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Name	Company/ Department	Date received	Method of comment	Issue raised	Response
				requirement of the use of water that in this regard is Section 21 (a) of the same act. Kindly indicate whether the Section 21 (a) water use does or will not form part of your application, how and why?	Please do not hesitate to contact me should you require any further information.
				Hope you find the above in order.	
M.M. Coetzee	PlanServ Town & Regional Planning	05-05-2014	Email	Good day Lizette Thank you for the feedback. I take note of the	Response from Shangoni: Good day Madie
	Services			contents of the letter and would like to inform you that the situation has indeed changed and we now rarely smell bad odours. We appreciate it. I would like to know if your client has already applied for a business permit / consent from the local	Thank you for your email. I will forward your enquiry to the client and will notify you of the situation in terms of the consent from the local authority as soon as I receive feedback from the client. Your comments will also be included in subsequent reports for this project.
				authority to conduct the facility on the farm. I know this is not related to the EIA process but in terms of the Physical Planning Act as well as local policies, any land use other than farming that is conducted on agricultural land needs a permit.	
Gerhard	Adjacent Land	18-07-2014	Email	Good day Lizette	Response from applicant
Nel	Owner			Thank you for the opportunity you gave us to have part in this very big project, although we are not 100% for it.	RESPONSE ON THE COMMENTS OF MR G. NEL Thank you for the opportunity to respond on the concerns, as emailed to us, of the above mentioned member of the community.

Mana	Company/	Dete received	Method of	logue reiged	Pagpanga
Name	Department	Date received	comment	Issue raised	Response
				My name is Gerhard Nel. I am the owner of the small	
				holding on Wilgeboom 46. It is located about 1km	We hereby state categorically:
				from this Chubby Chick site.	 Chubby Chick do not intend to increase the product volumes to the Rendering Facility.
				I am living here for the past 3 years now. Before that	2. We will not increase the number of vehicles or
				I was renting a flat on Wilgeboom 3. This is about	the road, other than we are operating for the
				4km from the mentioned site. I stayed there for 2	past 5 years.
				years. The reason I mention this will become clear	
				in a minute.	Please allow me to correct a possible misunderstanding:
				I have read through your WMLA draft and scoping	We are processing animal products such as blood
				report. Look like these people has done their	feathers, condemned carcasses (not fit for huma
				homework, and thought of everything. I do however	consumption) and DOA's (chickens dead on arriva
				have two major concerns. One is of an	at the factory), because we cannot send thes
				environmental concern. The other concern is the	products to landfill sites. We do however need
				current status of the road.	waste handling (management) license to rework th
					animal products.
				What became clear to me in the report, was that this	
				site does not have what they need to get rid of their	We will never transport waste (rubbish), suitable for
				waste. Now they do not only wish to get rid of their	a landfill site, to the premises of the Renderin
				waste, but want to create an establishment, where	facility, as we need to implement a proper was
				they can get rid of ALL the waste of all Chubby	management system as well.
				Chick's plants.	
				Yet again, not only they want to get rid of the waste	We have to comply with Act 36 of 1947 an
				but also want to put the waste to good use by	inspectors are visiting the premises on a frequer
				making animal foods. Doesn't this sound awesome?	basis to ensure compliance.

Company/ Name		Date received	Method of	Issue raised	Response
Name	Department	Date received	comment	ISSUE I dISEU	Kesponse
				Here is my problem. The way they got rid of their	We can assure the concerned person that the
				waste, or whatever they did on that site so close to	"smell" have also been addressed. We have already
				my home, caused a smell to die for. You can literally	installed bio-filters on the air scrubbing system,
				vomit from that smell on some days. If they start to	which should clear the air to acceptable levels.
				transport all the waste of all the sites to this location,	
				what do you think will happen with the smell? It will	I surely hope the above clears the questions asked.
				increase by the hundreds! Now, they do not only	Yours truly
				wish to get rid of all the waste, they want to cook	Deon Fourie
				some of it to make animal food. What do you think	
				that will smell like?	Initial response from Shangoni
					Good day Mr Nel
				I am sure they will have a very good strategy on how	
				they will make sure it won't happen, but my concern	I hereby acknowledge receipt of your comments for
				is, if they get to go ahead, and it's done, it's done.	the following project: Chubby Chick Rendering
				You can't afterwards say hey, you're cooking and	Facility (NWDEDECT EIA Ref: NWP/EIA/62/2013;
				waste disposal procedures are not in line with what	DEA EIA Ref: 12/9/11/L1392/7).
				you suggested. Or the outcome is not accepted.	
					Your comments will be included and addressed in
				If they can assure me and all the other owners, that	subsequent reports for this project.
				this won't happen, I have no problem and they can	
				build whatever they like, but if the smell will	Please do not hesitate to contact me should you
				increase, and make it unbearable to live there, I do	have any queries regarding the project.
				not want that project to get the go ahead! The	
				reason we people live out there and not in town, is	Second response from Shangoni
				because we love nature, love the silence, and the	This Waste Management License application and
				breath of fresh air.	its associated Environmental Impact Assessment
					process is for an existing rendering facility
	1	1	1		

Name	Company/	Date received	Method of	Issue raised	Response	
Name	Department	Date received	comment	issue laiseu	Response	
				My other concern is the road that leads to that site.	(operational since 1997) where waste (feathers,	
				This road is in good condition. Never did we	chicken pieces, Dead-on-Arrival chickens,	
				experience any problems with potholes etc. If a	condemned carcasses, fat and intestines from the	
				large amount of trucks will start to use this road, it	Chubby Chick abattoirs and farms) is currently	
				will become poor in just a short while. Will city	being rendered to produce a high-protein poultry by-	
				council budget to upgrade this road, maybe make it	product meal. No expansions are being proposed at	
				wider?	the facility. The volumes of waste (feathers, chicken	
					pieces, Dead-on-Arrival chickens, condemned	
				Just about 2 weeks ago, a man on his bicycle was	carcasses, fat and intestines) brought to the	
				killed. The road is not wide enough and yet it's been	rendering facility from the Chubby Chick abattoirs	
				used by lots and lots of bicycles. How will this	and farms will therefore not increase. A biofilter has	
				problem be solved?	been installed at the rendering facility to minimise	
					and possibly eliminate the release of odours from	
				Thank you again	the facility. The only construction activities that will	
				Gerhard	occur at the rendering plant is the	
					construction/installation of a wastewater treatment	
					works to effectively treat the wastewater generated	
					at the rendering facility to a quality that complies	
					with the Department of Water Affairs' General Limit	
					standards for discharge into a water resource or for	
					irrigation. This effective treatment of wastewater	
					should also reduce the odours generated at the	
					rendering facility.	
					Waste generated at the site, such as domestic	
					waste and boiler ash, will also be managed in an	
					environmentally responsible manner and taken to	

Name	Company/ Department	Date received	Method of comment	Issue raised	Response
					the relevant disposal or management sites according to the classification of the wastes in terms of the National Environmental Management: Waste Act, 1998. Management and mitigation measures will be recommended in the draft Environmental Management Programme for this project which will be provided to you for review and commenting in due course. In terms of the road to the rendering facility: As no expansion of the rendering facility is being proposed, there will be no increase in the number of vehicles travelling to and from the rendering plant.
Hellen Makwela	Department of Water and Sanitation	11-06-2015	Email	 RE: DRAFT SCOPING REPORT FOR EXPANSION OF THE CHUBBY CHICK RENDERING FACILITY ON THE FARM WILGEBOOM 458 IQ Reference is made to above mentioned report dated 27 May 2014. The Draft Scoping Report was reviewed for comments in accordance with applicable provisions in the National Water Act, 1998 (Act 36 of 1998) (NWA). 1. Page 25 of the report indicates that per day, approximately 55m³ of wastewater is 	Initial Response Good morning Hellen I hereby acknowledge receipt of your comments for the following project: Chubby Chick Rendering Facility project (NWDEDECT Ref: NWP/EIA/62/2013; DEA Ref: 12/9/11/L1392/7). Second Response Your letter dated 8 June 2015 refers. Herewith please find our formal response to the comments that you have raised.

Shangoni Management Services (Pty) Ltd

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Company/		Method of		Posponso	
Name	Department	Date received	comment	issue raiseu	Response
Name		Date received	comment	 Issue raised generated from the rendering process. The wastewater is currently flowing into the trenches and then pumped to an earth evaporation dam to the North east of the rendering facility. Kindly note that all wastewater pollution control dams should be lined, as part of the Water Use Licence Application (WULA) civil designs should be provided for the dams. Page 25 of the report indicates that a separate French drain has been installed for handling of the sewage and grey water from the shower. Kindly note that the DWS does not permit the use of French drain however, it recommends that there be consideration of other disposal methods ensuring that the wastewater never gets into contact with clean groundwater. Page 26 of the report indicates that the proposed changes require a water use license and registration, together with other water use activities, such as the storage of water, occurring at the facility. Kindly provide any registration once available together with WULA. Indicates that the proposed activities include possible change to the existing earth 	 Response Firstly, please note that this Environmental Impact Assessment process is not for the <i>expansion</i> of the rendering facility in terms of its processing capacity, but for its <i>upgrading</i> and the construction of a new wastewater treatment works. 1. The earth wastewater evaporation dam will be lined with an appropriate liner as part of the proposed upgrades to the existing (inadequate) wastewater treatment system. 2. The applicant did consider the installation of a conservancy tank system, but as the rendering facility is situated in a rural location far from services, the costs associated with emptying a conservancy tank by way of a honeysucker/super sucker are too high to be a financially feasible option. 3. The Water Use Registration and Water Use Licence application documents will be submitted to the Department of Water and Sanitation as soon as they have been finalised. 4. The earth wastewater evaporation dam will be lined with an appropriate liner as part of the proposed upgrades to the existing (inadequate) wastewater treatment system.

Page	11	4	of	168
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Namo	Company/	Data reasived	Method of	loous reised	Perpaga
Name	Department	Date received	comment		Response
Name		Date received		 Issue raised requires the applicant to ensure that the dam is adequately lined with a suitable liner to prevent groundwater pollution and the drawing designs must be submitted to the DWS for approval. The evaporation dam / pollution control dam must have at least 0.8m freeboard and must be able to cater for a 24 hour rainfall or 25 year rain event. 5. Page 30 of the report, Figure 7 shows a picture of the coal storage bunker, kindly take note that 	 Response not been compiled as yet and will be submitted to the Department for approval once finalised. 5. A Stormwater Management Plan has been compiled for the rendering facility. Please find the Stormwater Management Plan attached to this letter for your approval. 6. A Wetland Delineation and Functional Assessment was conducted by Limosella Consulting in February 2015. The study found that a hillside seep wetland is present on the
				a proper storm-water management plan. Kindly note that a proper storm-water management measures should be put in place to ensure separation of clean and dirty water. Storm- water drainage systems must also be installed around all structures (roads, vehicle maintenance yard, secured storage area and parking bays) in order to effectively manage all contaminated storm-water management must be adhered to. Also note that the design plan	property and that the rendering facility is 250m upslope from the wetland. A Water Use Licence application for Section 21(c) and (i) water uses will be submitted to the Department of Water and Sanitation once it has been finalised. Other water uses requiring registration and/or licensing will also form part of this application. A map showing the delineated wetland in relation to the rendering facility is attached to this letter.
				 should be submitted to the department for approval. 6. Page 58 of the report indicates that the majority of the site and property has been disturbed. Apart from the rendering facility, the property is used for crop production and is therefore in a disturbed stated. According to certain 	Chubby Chick takes note of the requirement to notify the Department of any pollution incidents. As also mentioned previously, a Water Use Licence application and accompanying Integrated Water and Waste Management Plan will be submitted to

Name Company/ Date received		Method of Issue raised		Response	
Name	Department	Date received	comment	issue laiseu	Response
				topographical maps, a drainage line may run to	the Department for all relevant water uses once the
				the west of the rendering facility and it is not	relevant application documents have been finalised
				known whether any wetland zones are present.	by Shangoni.
				The potential drainage line runs through an	
				existing crop production field. Please note that	All mitigation measures proposed in the
				no activity must take place within the 1:100	Environmental Impact Assessment and draft
				year flood line or the delineated riparian	Environmental Management Programme reports
				habitat, whichever is the greatest, or within	will be implemented by Chubby Chick.
				500m radius from the boundary of any wetland.	
				Should there be any activity within the	Third Response
				restricted area then such and activity is	Your letter dated 8 June 2015 refers. Herewith
				considered as a water use and a water use	please find further responses to the comments that
				authorisation in terms of Section 21(c) and (i)	you have raised.
				of the NWA should be applied for in	
				consultation with the Department. A clear,	1. The earth wastewater evaporation dam will be
				legible map must be submitted clearly	rehabilitated as the wastewater treatment
				indicating the 1:100 year flood line, or	works will no longer be required. A wastewater
				whichever is greater.	collection tank will instead be constructed for
					the containment of the wastewater before it is
				The Department must be notified in the event of any	removed for disposal offsite.
				pollution of the water resource. Proper management	2. Initially, the applicant did consider the
				measures must be employed towards the	installation of a conservancy tank system, but
				appropriate clean-up of the leaking or spilled	as the rendering facility is situated in a rural
				substance and its proper disposal in an acceptable	location far from services, the costs associated
				manner as required by Section 19 of the NWA. If	with emptying a conservancy tank by way of a
				any pollution incident is experienced, the DWS must	honeysucker/super sucker were too high to be
					a financially feasible option. More recently, this

Name	Company/	Date received	Method of	Issue raised	Por	20000
Name	Department	Date received	comment	issue laiseu	Res	sponse
				be notified immediately (within 24 hours) as required		option has been re-evaluated and is now the
				in terms of Section 20 of the NWA.		preferred option. The rendering facility
						wastewater, grey water and sewage will be
				An applicant is required to apply a water use license		contained in collection facilities (a collection
				in terms of Section 21 of the NWA for all water use		tank for the wastewater and grey water, and a
				activities that is taking place in a proposed and		conservancy tank for the sewage) prior to its
				existing development. Furthermore the DWS would		removal for disposal offsite.
				like to advise the pre-application consultation	3.	The Water Use Registration and Water Use
				meeting to ensure that all potential water uses are		Licence application documents will be
				identified and applied for.		submitted to the Department of Water and
						Sanitation as soon as they have been finalised.
				All commitments made within the Report aimed at	4.	The earth wastewater evaporation dam will be
				decreasing the environmental impacts must be		rehabilitated as the wastewater treatment
				adhered to.		works will no longer be required. A wastewater
				Should you have any queries, please contact Ms H		collection tank will instead be constructed for
				Makwela of this office (details indicated above and		the containment of the wastewater before it is
				email below).		removed for disposal offsite.
					5.	A Stormwater Management Plan has been
						compiled for the rendering facility.
					6.	A Wetland Delineation and Functional
						Assessment was conducted by Limosella
						Consulting in February 2015. The study found
						that a hillside seep wetland is present on the
						property and that the rendering facility is 250m
						upslope from the wetland. A Water Use
						Licence application for Section 21(c) and (i)
						water uses will be submitted to the Department

Name	Company/ Department	Date received	Method of comment	Issue raised	Response
					of Water and Sanitation once it has been finalised. Other water uses requiring registration and/or licensing will also form part of this application.
Gerhard	Adjacent	08-09-2015	Email	Good day.	Response from applicant
Nel	landowner			I have read through your document and visited your web site.	We take note of Mr. Nel's comments. Smell:
				Everything looks well in order, and to say the least, it looks like everything is covered.	 We have commissioned a new (bigger and more efficient) boiler. Unfortunately during the commissioning phase we had to establish the
				I do however have two concerns.1- When we interact in the beginning, I mentioned that the smell sometimes is unbearable. You then said that new state of the art filters will be in place or installed.	vapor temperature that is passed through the bio-filter system. When the vapor exit temperature is too high the efficiency of the filters is compromised.
				I am less than 1 kilometre from your site. Sometimes the smell is still quite horrible. This usually happens by night. So I am not sure why we still get these horrible smells?	We regret the inconvenience caused, by releasing bad odor vapors, during the commissioning phase. Water:
				2- My second concern is our water. Everyone in the area is using borehole water. This water come from not so deep down our earth.	 We have acquired two feather presses to press out water from the feathers at the processing plants. This will cause approximately 60% less water to be transported to the Rendering plant,

Name	Company/	ompany/ Method of Date received Issue raised		Response	
Name	Department	Date received	comment	Issue raised	Response
				 When you mention waste, and the procedures to get rid of your waste, I am afraid that these waste or affected water might filter down in our underwater streams, and have an effect on our quality of water. Yes your website does explain safety measures, but if for example the water does get contaminated, what then? What's done is done. Thank you for allowing the public to voice their concerns. Thank you. Gerhard. 	which normally ends in the waste water system. We estimate that the waste water volume will reduce from 55 000Lt to less than 20 000 Lt per day. All waste water will be collected in a 100 000 Lt tank and be transported to the Municipal Wastewater Treatment Works. It needs to be mentioned that the sewerage generated on the premises will be stored in a conservancy tank, not a French Drain System, to be regularly removed to the Municipal Wastewater Treatment Works. No waste water will be allowed to filter to the underground and thus contaminate the water sources.
					If there are still concerns we will gladly respond to them.
M.M. Coetzee	PlanServ Town & Regional Planning Services	09-09-2015	Email	RE: DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AVAILABLE FOR REVIEW: CHUBBY CHICK RENDERING FACILITY: APPLICATION FOR ENVIRONMENTAL AUTHORISATION, WATER USE- AND ATMOSPHERIC EMISSION- LICENSES	Comments noted.

Shangoni Management Services (Pty) Ltd

Page	11	9 of	168
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Nomo	Company/ Date received		Method of	Issue raised	Response	
Name	Department	Date received	comment	Issue raised	Response	
				I acknowledge receipt of your letter dated 8		
				September 2015 with reference number		
				NWP/EIA/62/2013.		
				This office has no comments regarding the above.		
Ragna	SAHRA	21-09-2015	SAHRIS	The Cycle City (Pty) Ltd. (trading as Chubby	We hereby acknowledge receipt of SAHRA's	
Redelstorff			website	Chick Enterprises) rendering facility is situated	comments for the Chubby Chick rendering facility	
				on Portion 198 of the farm Wilgeboom 458 IQ,	project.	
				North West Province. The operation requires		
				environmental authorisation as well as the	Mr Anton Pelser of APelser Archaeological	
				following licenses: A Waste Management	Consulting was appointed to undertake the	
				License in terms of section 19 and 20(b) of the	necessary site investigation and assessment for the	
				National Environmental Management: Waste	proposed project. His findings, as contained in the	
				Act, 2008 (Act No. 59 of 2008), a Water Use	document Anton Pelser. November 2015. Letter of	
				License in terms of Chapter 4 of the National	Exemption for Full HIA & Short Report on Site Visit	
				Water Act, 1998 (Act No. 36 of 1998) and an	on 6th of November 2015, indicated that the area	
				Atmospheric Emission License in terms of	where the wastewater collection tank is to be	
				section 21 of the National Environmental	constructed has been extensively disturbed and	
				Management: Air Quality Act, 2004 (Act No. 39	that, from a Cultural Heritage perspective, the	
				of 2004).	development should be allowed to continue without	
					the required full Phase 1 HIA.	
				Thank you for your application regarding the		
				construction of a rendering facility on portion 198 of	Mr Pelser's Letter of Exemption for Full HIA & Short	
				the farm Wilgeboom 458 IQ near Potchefstroom,	Report was submitted to SAHRA for review via the	
				North West Province. In terms of the National	SAHRIS website on the 16 th of November 2015.	
				Heritage Resources Act, no 25 of 1999, heritage		

Name	Company/ Department	Date received	Method of comment	Issue raised	Response
				resources, including archaeological or	
				palaeontological sites over 100 years old, graves	
				older than 60 years, structures older than 60 years	
				are protected. They may not be disturbed without a	
				permit from the relevant heritage resources	
				authority. This means that prior to development it is	
				incumbent on the developer to ensure that a	
				Heritage Impact Assessment is done. This must	
				include the archaeological component (Phase 1)	
				and any other applicable heritage components.	
				Appropriate (Phase 2) mitigation, which involves	
				recording, sampling and dating sites that are to be	
				destroyed, must be done as required.	
				The quickest process to follow for the	
				archaeological component is to contract an	
				accredited specialist (see the web site of the	
				Association of Southern African Professional	
				Archaeologists www.asapa.org.za) to provide a	
				Phase 1 Archaeological Impact Assessment	
				Report. This must be done before any large	
				development takes place.	
				The Phase 1 Impact Assessment Report will identify	
				the archaeological sites and assess their	
				significance. It should also make recommendations	
				(as indicated in section 38) about the process to be	
	·	·	·		

Name	Company/ Department	Date received	Method of comment	Issue raised	Response
				followed. For example, there may need to be a	
				mitigation phase (Phase 2) where the specialist will	
				collect or excavate material and date the site. At the	
				end of the process the heritage authority may give	
				permission for destruction of the sites.	
				If the property is very small or disturbed and there is	
				no significant site the heritage specialist may	
				choose to send a letter to the heritage authority to	
				indicate that there is no necessity for any further	
				assessment.	
				Any other heritage resources that may be impacted	
				such as built structures over 60 years old, sites of	
				cultural significance associated with oral histories,	
				burial grounds and graves, graves of victims of	
				conflict, and cultural landscapes or viewscapes	
				must also be assessed.	
				The PalaeoSensitivity Map on SAHRIS	
				(http://www.sahra.org.za/sahris/map/palaeo)	
				indicates insignificant palaeontological sensitivity	
				for the proposed area and it is the proposed facility	
				is underlain by unfossiliferous rocks of the	
				Magaliesberg Formation (Pretoria Group) Vaalian	
				Erathem. Therefore, no Palaeontological Impact	
				Assessment is required.	
	1	I	1	<i>(</i>	

Name	Company/ Department	Date received	Method of comment	Issue raised	Response
Ragna Redelstorff	Department	10-02-2016	comment SAHRIS website	Should you have any further queries, please contact the designated official using the case number quoted above in the case header. The Cycle City (Pty) Ltd. (trading as Chubby Chick Enterprises) rendering facility is situated on Portion 198 of the farm Wilgeboom 458 IQ, North West Province. The operation requires environmental authorisation as well as the following licenses: A Waste Management License in terms of section 19 and 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), a Water Use License in terms of Chapter 4 of the National Water Act, 1998 (Act No. 36 of 1998) and an Atmospheric Emission License in terms of section 21 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). Thank you for your application regarding the construction of a rendering facility on portion 198 of the farm Wilgeboom 458 IQ near Potchefstroom, North West Province. In a letter dated 21 September	Comments noted. The stipulated conditions have been included in the Environmental Impact Assessment Report as well as in the Environmental Management Programme for this application.
				2015, SAHRA requested an HIA or exemption letter to be authored by a professional archaeologist to be	

Name	Company/	Date received	Method of	Issue raised	Response
Name	Department	Date received	comment	ISSUE I diseu	Kesponse
				submitted to the application, the latter of which has	
				been received:	
				Anton Pelser. November 2015. Letter of Exemption	
				for Full HIA & Short Report on Site Visit on 6th of	
				November 2015.	
				The author recommends exemption from further	
				studies as the proposed area is very small and has	
				been previously disturbed by human activity.	
				Final comment	
				The SAHRA Archaeology, Palaeontology and	
				Meteorites Unit agrees with the recommendation in	
				the exemption letter and has no objection against	
				the proposed development. The following	
				conditions must be adhered to:	
				1. Should any objects of archaeological or	
				palaeontological remains be found during	
				construction activities, work must immediately stop	
				in that area and the Environmental Control Officer	
				(ECO) must be informed.	
				2. The ECO must inform the South African Heritage	
				Recourse Agency (SAHRA) and contact an	
				archaeologist and/or palaeontologist, depending on	
				the nature of the find, to assess the importance and	

Page	124	of	168
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Name	Company/ Department	Date received	Method of comment	Issue raised	Response
				rescue them if necessary (with the relevant SAHRA permit). No work may be resumed in this area without the permission from the ECO and SAHRA. 3. If the newly discovered heritage resource is considered significant a Phase 2 assessment may be required. A permit from the responsible heritage authority will be needed. 4. The above recommendations must be incorporated into the Environmental Management Programme (EMPr) for implementation. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.	
Gerhard Nel	Adjacent Landowner	16-03-2016	Email	Good day. Thank you so much for your mail and that we are still being recognised. I have one question. If this project proceed, and everything goes well, but after for example one year, we are getting unbearable smells and we are experiencing dirty drink water. What do we do then? Will our voices be heard when we complain about things once this plant is running?	Your email dated 16 March 2016 refers. Herewith please find a response to the comments that you have raised. Response from applicant Please take note that the Chubby Chick Rendering facility has been operational since 1996. It is thus not a new project but we now have to comply with Environmental Legislation. Chubby Chick is in the process of obtaining a Waste Management Licence and Atmospheric Emission Licence by means of Environmental Impact Assessment (EIA)

Shangoni Management Services (Pty) Ltd

Name	Company/	Date received	Method of	Issue raised	Response
Nume	Department	Date received	comment	15540 141504	Response
				There are promises now, and everything looks good	processes. The Environmental Management Plans
				on paper, but if it's a mess after one year, what do	(EMP) that was compiled as port of the EIA
				we do? What do we do if the big tanks overflow with	processes, will be implemented at the rendering
				waste?	facility. Chubby Chick will also be required to apply
				If the water is contaminated, it's done, no solution!	for a Water Use Licence (WUL).
				If the smell goes beyond any control?	
				It is still my opinion that this site should move to	Once the licenses are approved, inspectors of the
				another location, but if it should stay, please answer	various sections will be conducting unannounced
				my questions please.	inspections to ensure Legal compliance.
				Regards	The purpose is to manage the Rendering facility for,
				Gerhard Nel.	at least, the next 20 years within the limits of the
					approved Environmental Management Legislation.
					You will also be able to report any concerns directly to Chubby Chick, or the relevant Environmental
					Departments, namely the National Department of
					Environmental Affairs and the North-West
					Department of Rural, Environmental and
					Agricultural Development.
					Agricultural Development.
					If you have any other concerns, we will gladly
					respond to them.
Ms Ntombi	Tlokwe City	29-04-2016	Email	Good Day Ms Venter,	Your email dated 29 April 2016 refers. Herewith
Rikhotso	Council –				please find a response to the comments that you
	Environmental				have raised.

Company/ Department	Date received	Method of comment	Issue raised	Response	
Management			The Environmental Management Section has read		
Unit			through both the reports and at this stage the	Response from applicant	
			following comments/concerns:	Due to the fact that water shortages are a problem	
				at the rendering facility the following measures were	
			1. Dust Nuisance	put in place to control dust on site:	
			- Measures should be in place to control dust	• A speed limit of 40km/h was instituted on	
			nuisance during the removal of boiler ash on	site.	
			site and also on the access road from moving	Boiler ash will be lightly sprayed with water	
			trucks to site.	during loading.	
				• Removal contractors were requested to	
			Kind regards,	cover the loaded vehicles during	
			Ntombi	transportation of boiler ash.	
				·	
				If you have any other concerns, we will gladly	
				respond to them.	
	Department Management	Department Date received Management	Date received comment Management	Department Date received comment Issue raised Management Unit The Environmental Management Section has read through both the reports and at this stage the following comments/concerns: 1. Dust Nuisance - Measures should be in place to control dust nuisance during the removal of boiler ash on site and also on the access road from moving trucks to site. Kind regards,	

Page 126 of 168

4.3.9 Conclusions of the PPP

In conclusion, the Public Participation exercise has provided adequate information to enable an understanding of what the proposed rendering facility project entails and to address the concerns and comments received during the EIA process.

5. NEED AND DESIRABILITY FOR THE ACTIVITY

A need and desirability for this project is evident from the following perspectives:

5.1 Developer/Applicant

Licensing the rendering facility in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) will mean that the facility will be one of only a few licensed rendering facilities, in terms of environmental legislation, in the area. This legal compliance will ensure that the rendering facility can operate for the foreseeable future, without the risk of prosecution for non-compliance to the law. This should also reduce the insurance liability of the facility, decreasing premiums for the applicant. Furthermore, having a licensed facility will result in a better reputation for Chubby Chick and their product, the high-protein meal, will be considered superior to high-protein meals produced at unlicensed facilities.

The upgrading of the current wastewater management system will ensure that wastewater (process water) generated at the rendering facility is contained effectively and safely in a wastewater collection tank before its disposal offsite. The changes will ensure that wastewater generated at the facility no longer pollutes the environment. The existing wastewater evaporation dam and wastewater trenches will also be rehabilitated. The above listed improvements will ensure that the rendering facility operates in a more environmentally responsible manner and will decrease the reputational and legislative liabilities faced by the facility.

5.2 Local community

The unemployment rate for the Tlokwe City Council municipal area is almost 30% according to the 2011 census (Statistics South Africa, 2011). The rendering facility employs 25 people on a permanent basis and this ensures a constant income for up to 25 households. The continued, sustainable operation of the rendering facility will benefit the local community though the continued employment of 25 people. The rendering facility also stimulates other businesses, such as the transporters that collect boiler ash from the facility.

6. IDENTIFIED ALTERNATIVES

The following definition of "alternatives" is given in the EIA Regulations of 18 June 2010: "alternatives", in relation to the proposed activity, *means different means of meeting the general purpose and requirements of the activity, which may include alternatives to-*

- a) the property on which or location where it is proposed to undertake the activity;
- b) the type of activity to be undertaken;
- c) the design or layout of the activity;
- d) the technology to be used in the activity;
- e) the operational aspects of the activity; and
- f) the option of not implementing the activity".

Typically, alternative assessments are conducted to assist in comparing various projects or attributes of projects that will occur. The most critical comparison is evaluating any proposed project against the No-Go option. The alternatives assessment then considers alternatives to project site selection for the proposed development; alternatives to layout of the development; and alternatives to construction methodologies and/or materials used for the development.

The alternatives assessment was conducted using an analysis of each proposed alternative, through assessing various environmental attributes. These attributes can include physical (geology and soils, surface water quality and quantity, groundwater quality and quantity); biophysical (flora and fauna, sensitive environments); and social attributes (site of archaeological or cultural importance, land use issues, social health and welfare).

The impact of each alternative was then evaluated in terms of whether it has a positive, negative, or no impact. In this instance, the impact is not evaluated in terms of significance but rather in terms of whether or not it will arise. Positive impacts are assigned a value of 1; no impact a value of 0; and a negative impact a value of -1.

By adding all of the attribute scores for each alternative, a suitability score is derived that indicates the preferred alternative. A total positive score indicates the project benefits outweigh the potential negative impacts, while a total negative score indicates the project environmental costs outweigh the potential benefits. Essentially, the highest scoring alternative is then carried forward for full impact evaluation.

6.1 No-Go option

The potential impact of the preferred project option on environmental and socio-economic attributes identified during the assessment phase is evaluated against the potential impact of the No-Go option on the same attributes. The summary of this assessment is provided in the table below.

Attribute	Development Option	No-go Option					
Physical environment							
Air Pollution	-1	-1					
Noise Pollution	-1	-1					
Water Quality	1	-1					
Water Quantity	-1	-1					
Visual Aesthetics	-1	-1					
	Biophysical environment						
Fauna and Flora	0	-1					
Sensitive Environments	0	-1					
	Social environment						
Traffic	0	0					
Impact on property values	1	-1					
Safety and security	0	0					
National, regional and local economy	1	1					
Infrastructure development	1	0					
Total	0	-7					

As can be seen in the table above, the no-go option has an overall negative score whilst the development option has an overall score of zero. The following improvements will occur at the rendering facility as part of the development option and they balance out the current negative impacts of the operation of the rendering facility:

- A wastewater collection tank will be installed to contain all wastewater generated from the rendering facility and ensure no further negative impact on fauna, flora and sensitive environments;
- The existing earth, wastewater evaporation dam and wastewater trenches will be rehabilitated; and
- The rendering facility will be licensed in terms of the National Environmental Management: Waste Act, 2008. Licensing will entail the stipulation of various mitigation and management measures by the competent authorities, resulting in the facility being managed in a more environmentally responsible manner.

The above mentioned improvements will decrease the environmental impact of the rendering facility (below current, no-go option levels).

6.2 Alternatives considered

The following alternatives were compared using a qualitative assessment.

6.2.1 Activity and process alternatives

The first activity is the treatment of hazardous waste (abattoir waste from the Chubby Chick abattoirs and chicken mortalities from the Fourie's Poultry chicken farms) at the Chubby Chick rendering facility, making the waste harmless to the environment. The end-product of this process is a by-product meal that can be sold to generate an income for Chubby Chick. An alternative way for Chubby Chick to responsibly handle their hazardous waste would be to dispose of the waste at a licensed hazardous waste disposal site, such as Enviroserv's Holfontein hazardous waste disposal site in Sundra. This is not deemed a feasible alternative for the following reasons:

- Disposal of hazardous waste at a licensed hazardous waste disposal site is costly and would be a significant financial burden to Chubby Chick in terms of the amount of waste that would need to be disposed on a monthly basis. This would jeopardise the profitability and long-term, sustainable operation of the Chubby Chick abattoirs and farms and of the permanent jobs that are created at the abattoirs, farms and related industries; and
- Disposal of the waste at a hazardous waste disposal site would mean that the waste cannot be
 processed at the Chubby Chick rendering facility. The income from this process would not be
 generated and the permanent jobs created at the rendering facility would not exist.

The second activity is the construction of a new wastewater collection tank and the rehabilitation of the existing earth evaporation dam and earth canals.

The current wastewater treatment system at the rendering facility is inefficient and entails the evaporation of untreated wastewater in an earth evaporation pond. The first process alternative that was being considered was the installation of an adequately designed process wastewater treatment works to treat the wastewater to a quality that complies with the Department of Water Affairs' General Limit standards for irrigation and/or discharge into a water resource. A second alternative, namely the lining of the existing earth evaporation dam, was also being considered. The earth evaporation dam constitutes a temporary wastewater storage facility for the rendering plant.

In terms of the treatment of wastewater, a number of treatment options were considered. The most prevalent options are the use of chemical and biological treatment processes. Biological treatment systems entail the use of microorganism (bacteria) to degrade and decompose organic materials found in the wastewater. Chemical treatment systems rely on the addition of a variety of chemicals, such as coagulants and flocculants, to treat the wastewater.

Whilst a biological treatment process is a more natural process, it has a number of risks. Firstly, the bacterial required for the process are costly and supply from suppliers may become a liability should

the supplier become unreliable. The balance or combination of the different bacterial strains required to effectively treat the wastewater is crucial and the risk exists that the balance will not be obtained and the resultant treatment will not be entirely effective. Finally, the bacteria require warm temperatures to thrive. In winter months where temperatures regularly drop to close to zero degrees Celsius during the night, conditions are not ideal for the growth and functioning of the bacteria and their treatment efficacy is compromised, leading to ineffectively treated wastewater.

In terms of the existing earth evaporation dam, two alternatives were considered. The current earth evaporation dam could be lined with a suitable HDPE liner to prevent infiltration of treated wastewater into the soil and groundwater regime. The second alternative would be to construct a new treated wastewater storage facility for the storage of the treated wastewater prior to it being irrigated or discharged (when irrigation may not be possible). An option would be to construct a concrete sump for the containment of the treated wastewater. It is, however, more practical to rather line the existing earth evaporation dam as the dam is already present and no further earthworks would be required, as would be the case for the construction of a sump. The lining of the existing earth evaporation dam could also be cheaper than the construction of a concrete sump. Finally, the construction of a concrete sump would entail further disturbance and destruction of vegetation onsite and this is not preferable.

During the course of this Environmental Impact Assessment process, another possible alternative was identified and included in this assessment. This alternative is the containment of the rendering facility wastewater in a collection tank prior to its disposal offsite. With the installation of feather presses at the abattoirs that supply waste to the rendering facility, this alternative became both feasible and preferable, as the volume of wastewater that will be generated at the rendering facility will decrease from $\pm 55m^3$ to $\pm 20m^3$ per day after the feather presses are installed at the abattoirs. This wastewater management alternative option has become the preferred option as it is both practical and economic. There will also be no risk of the wastewater being inefficiently treated in a wastewater treatment system or high maintenance costs. As the existing earth evaporation dam and wastewater trenches will no longer be required, they will be rehabilitated.

6.2.2 Location alternatives

As this project entails the licensing of an existing, operational rendering facility, no location alternatives can be considered for the rendering facility itself, nor for the construction of the new wastewater collection tank. The location of the rendering facility is on Portion 198 of the farm Wilgeboom 458 IQ.

6.2.3 Site layout alternatives

As this project entails the licensing of an existing, operational rendering facility, no site layout alternatives can be considered for the rendering facility itself. In terms of the construction of the new wastewater collection tank, it is practical for the tank to be constructed as close as possible to the rendering facility due to the following reasons:

- Siting the wastewater collection tank close to the rendering facility minimises the distance of piping and consequently also the amount of electricity required to pump wastewater to the tank; and
- Siting the wastewater collection tank close to the rendering facility minimises the size of the area that needs to be disturbed and/or destroyed to construct the tank. Siting the tank further away from the rendering facility would entail the disturbance of vegetation to gain access to the tank. The proposed site for the collection tank is an already heavily disturbed area, as confirmed during the Heritage Assessment.

Due to the above, it is proposed to construct the wastewater collection tank immediately to the Northwest of the rendering facility and no other site layout alternatives have been considered.

7. ENVIRONMENTAL IMPACT ASSESSMENT

7.1 Aims of Environmental Impact Assessment

Potential environmental impacts (biophysical) associated with the proposed upgrade of the Chubby Chick Rendering Facility have been identified.

The Environmental Impact Assessment (EIA) phase aims to adequately investigate and address all potentially significant environmental issues in order to provide the National Department of Environmental Affairs with sufficient information to make an informed decision regarding the proposed project.

This part of the document thus focuses on the identification of the major potential impacts the activities, processes and actions may have on the surrounding environment. It indicates the major impacts that these activities may have on the environmental components associated with the site, as required in terms of R.543 of the EIA Regulations, 2010.

The EIA aims to achieve the following:

- To provide a detailed assessment of the biophysical environments affected by the proposed project;
- To assess impacts on the study area in terms of environmental criteria; and
- To identify and recommend appropriate mitigation measures for potentially significant environmental impacts.

This EIR addresses the following:

- A detailed description of the proposed project;
- Detailed assessment of the impacts identified which are determined to be potentially significant;
- Recommendations regarding the mitigation of significant impacts; and
- To meet the requirements and to comply with the necessary legislation and Acts.

This EIR addresses the following:

- A detailed description of the proposed project;
- Detailed assessment of the impacts identified which are determined to be potentially significant;
- Recommendations regarding the mitigation of significant impacts; and
- To meet the requirements and to comply with the necessary legislation and Acts.

Any specialist studies are combined into this consolidated report to allow for easy assessment of the potential aspects with associated impacts.

7.2 Environmental Impact Assessment Procedure

The environmental risk of any aspect is determined by a combination of parameters associated with the impact. Each parameter connects the physical characteristics of an impact to a quantifiable value to rate the environmental risk.

Impact assessments should be conducted based on a methodology that includes the following:

- Clear processes for impact identification, predication and evaluation;
- Specification of the impact identification techniques;
- Criteria to evaluate the significance of impacts;
- Design of mitigation measures to lessen impacts;
- Definition of the different types of impacts (indirect, direct or cumulative); and
- Specification of uncertainties.

After all impacts have been identified, the nature of each impact can be predicted. The impact prediction will take into account physical, biological, socio-economic and cultural information and will then estimate the likely parameters and characteristics of the impacts. The impact prediction will aim to provide a basis from which the significance of each impact can be determined and appropriate mitigation measures can be developed.

The risk assessment methodology is based on defining and understanding the three basic components of the risk, i.e. the source of the risk, the pathway and the target that experiences the risk (receptor). Refer to the figure below for a model representing the above principle (as contained in the DWA's Best Practice Guideline: G4 – Impact Prediction).

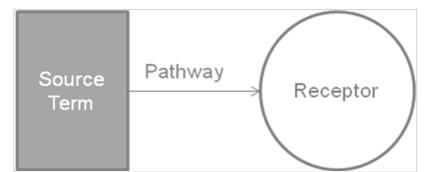


Figure 57: DWA's model for impact prediction (risk assessments)

Table 21 and Table 22 below indicate the methodology to be used in order to assess the Probability and Magnitude of the impact, respectively, and Table 23 provides the Risk Matrix that will be used to plot the Probability against the Magnitude in order to determine the Severity of the impact.

Frequency of Aspect / Unwanted Event	Score	Availability of pathway from the source to the receptor	Score	Availability of receptor	Score
Never known to have happened, but may happen	1	A pathway to allow for the impact to occur is never available	1	The receptor is never available	1
Known to happen in industry	2	A pathway to allow for the impact to occur is almost never available	2	The receptor is almost never available	2
< once a year	3	A pathway to allow for the impact to occur is sometimes available	3	The receptor is sometimes available	3
Once per year to up to once per month	4	A pathway to allow for the impact to occur is almost always available	4	The receptor is almost always available	4
Once a month - Continuous	5	A pathway to allow for the impact to occur is always available	5	The receptor is always available	5

Table 21: Determination of Probability of Impact

Step 1: Determine the **PROBABILITY** of the impact by calculating the average between the Frequency of the

Aspect, the Availability of a pathway to the receptor and the availability of the receptor.

Table 22: Determination of Magnitude of Impact

				Source				Receptor						
Duration of impact	Score	Extent	Score	Volume / Quantity / Intensity	Score	Toxicity / Destruction Effect	Score	Reversibility	Score	Sensitivity of environmental component	Score			
Lasting days to a month	1	Effect limited to the site. (metres);	1	Very small quantities / volumes / intensity (e.g. < 50L or < 1Ha)	1	Non-toxic (e.g. water) / Very low potential to create damage or destruction to the environment	1	Bio-physical and/or social functions and/or processes will remain unaltered.	1	Current environmental component(s) are largely disturbed from the natural state. Receptor of low significance / sensitivity	1			
Lasting 1 month to 1 year	2	Effect limited to the activity and its immediate surroundings. (tens of metres)	2	Small quantities / volumes / intensity (e.g. 50L to 210L or 1Ha to 5Ha)	2	Slightly toxic / Harmful (e.g. diluted brine) / Low potential to create damage or destruction to the environment	2	Bio-physical and/or social functions and/or processes might be negligibly altered or enhanced / Still reversible	2	Current environmental component(s) are moderately disturbed from the natural state. No environmentally sensitive components.	2			
Lasting 1 – 5 years	3	Impacts on extended area beyond site boundary (hundreds of metres)	3	Moderate quantities / volumes / intensity (e.g. > 210 L < 5000L or 5 – 8Ha)	3	Moderately toxic (e.g. slimes) Potential to create damage or destruction to the environment	3	Bio-physical and/or social functions and/or processes might be notably altered or enhanced / Partially reversible	3	Current environmental component(s) are a mix of disturbed and undisturbed areas. Area with some environmental sensitivity (scarce / valuable environment etc.).	3			
Lasting 5 years to Life of Organisation	4	Impact on local scale / adjacent sites (km's)	4	Very large quantities / volumes / intensity (e.g. 5000 L – 10 000L or 8Ha– 12Ha)	4	Toxic (e.g. diesel & Sodium Hydroxide)	4	Bio-physical and/or social functions and/or processes might be considerably altered or enhanced / potentially irreversible	4	Current environmental component(s) are in a natural state. Environmentally sensitive environment / receptor (endangered species / habitats etc.).	4			
Beyond life of Organisation / Permanent impacts	5	Extends widely (nationally or globally)	5	Very large quantities / volumes / intensity (e.g. > 10 000 L or > 12Ha)	5	Highly toxic (e.g. arsenic or TCE)	5	Bio-physical and/or social functions and/or processes might be severely/substantially altered or enhanced / Irreversible	5	Current environmental component(s) are in a pristine natural state. Highly Sensitive area (endangered species, wetlands, protected habitats etc.)	5			

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Step 2: Determine the MAGNITUDE of the impact by calculating the average of the factors above.

ENVIRONMENTAL IMPACT RATING / PRIORITY												
		MAGNITUDE										
PROBABILITY	1 Minor	2 Low	4 High	5 Major								
5 Almost Certain	Low	Medium	High	High	High							
4 Likely	Low	Medium	High	High	High							
3 Possible	Low	Medium	Medium	High	High							
2 Unlikely	Low	Low	Medium	Medium	High							
1 Rare	Low	Low	Low	Medium	Medium							

Table 23: Determination of Severity of impact

Step 3: Determine the **SEVERITY** of the impact by plotting the averages that were obtained above for Probability and Magnitude in the table below.

7.3 Description of Environmental Impacts

The aim of this section of this EIA report is to provide information regarding the potential environmental impacts associated with the proposed activities. In order to provide background information and a framework for the environmental risk assessment, a description of the different phases of the project is provided below. Refer to the tables below for the impacts associated with the Chubby Chick Rendering Facility project.

Planning and Design Phase

- Soil, surface water and groundwater pollution during the operational phase due to inadequate design of the wastewater collection tank;
- Soil, surface water and groundwater pollution, as well as nuisance caused by odours and unsightly appearance of waste onsite, due to inadequate design of waste storage facilities and/or areas;
- Degradation and loss of a valuable resource (topsoil) through increased runoff as stormwater flows over cleared, bare areas during rainfall events, due to poor scheduling of construction activities;
- Generation of noise and nuisance to neighbours as a result of construction activities occurring during inconvenient times of the day; and
- Generation of atmospheric emissions, odours and nuisance to neighbours during the operational phase, due to inadequate design of the air treatment system (odour abatement system).

Construction Phase

- Harm to the environment in general (this can include pollution of soil and water resources, as well as harm to employees and wasteful practices in terms of resource use and waste management);
- Removal of indigenous vegetation during the construction phase;
- Disturbance or destruction of vegetation surrounding the site as a result of runaway veld fires caused by workers or contractors;

- Introduction of alien invasive plants that can impact on the hydrology and outcompete natural vegetation. Alien and invasive plant species also generally use more water than indigenous plants;
- The construction activities associated with the proposed new wastewater collection tank may disturb or destroy areas of the wetlands onsite;
- Degradation and loss of a valuable resource (topsoil);
- Erosion of cleared areas;
- Soil and surface water pollution as a result of the spillage, improper handling, storage, mixing or disposal of cement and concrete;
- Soil and surface water pollution through contaminated wash water runoff;
- Soil, surface water and groundwater pollution due to poor waste management as well as nuisance caused by odours and unsightly appearance of waste onsite;
- Soil, surface water and groundwater pollution from unsanitary conditions onsite;
- Soil, surface water and groundwater pollution as a result of poor management and accidental spills of hazardous chemical substances used onsite;
- Hydrocarbon pollution of soil, surface water and groundwater through the spilling of fuel, grease or oil or leaking equipment and vehicles;
- Ambient air quality degradation as well as disturbance and nuisance to neighbours and other sensitive receptors due to dust generation;
- Noise pollution and nuisance to neighbours;
- Wear of access roads, accidents on access roads, unpermitted transport of materials and loss of materials being transported on access roads;
- Wastage or depletion of a valuable resource (groundwater) due to inefficient or redundant usage;
- Loss of artefacts or sites protected by the National Heritage Resources Act, 1999 (Act No. 25 of 1999).

Operational Phase

- Harm to the environment in general (this includes pollution of soil and water resources, as well as harm to employees and wasteful practices in terms of resource use and waste management);
- Growth of alien and invasive vegetation leading to smaller habitat areas available for indigenous vegetation. Alien and invasive plant species also generally use more water than indigenous plants;
- Loss of indigenous grassland and habitats for indigenous fauna species surrounding the site as a result of runaway veld fires;
- The potential release of wastewater or affected stormwater into the environment can lead to further degradation of the hillside seep wetland;
- Soil, surface water and groundwater pollution as well as nuisance caused by odours and unsightly appearance of waste onsite as a result of poor waste management (waste generated at the facility and not including incoming waste from the abattoirs for processing at the rendering facility);
- Soil, surface water and groundwater pollution as well as nuisance caused by odours and unsightly
 appearance of waste onsite as a result of poor management of incoming waste from the abattoirs
 (waste to be processed at the rendering facility);

- Soil, surface water and groundwater pollution from unsanitary conditions onsite;
- Soil, surface water and groundwater pollution as a result of poor management and accidental spillage of hazardous chemical substances used onsite;
- Soil, surface water and groundwater pollution through spillage of fuel, grease or oil and leaking equipment and vehicles;
- Soil, surface water and groundwater pollution due to the inadequate containment of wastewater in the wastewater collection tank and sewage in the conservancy tank;
- Soil, surface water and groundwater pollution due to poor handling and storage of coal;
- Soil, surface and groundwater pollution as a result of poor ash management;
- Soil and surface water pollution due to the contamination of 'clean' stormwater in 'dirty' areas;
- Ambient air quality degradation as well as disturbance and nuisance to neighbours and other sensitive receptors due to dust generated from onsite traffic;
- Noise disturbance and nuisance to neighbours and other sensitive receptors due to operational activities;
- Disturbance and nuisance to neighbours and other sensitive receptors due to offensive odours generated at the rendering facility;
- Ambient air quality degradation through combustion emissions from boilers;
- Wear of access roads, accidents on access roads, unpermitted transport of materials and loss of materials being transported on access roads;
- Wastage or depletion of valuable resources (groundwater and electricity) due to inefficient or redundant usage;
- Outbreak of diseases and possible infection of workers at the facility; and
- Loss of artefacts or sites protected by the National Heritage Resources Act, 1999 (Act No. 25 of 1999).

Rehabilitation Phase

- Ineffective rehabilitation, including soil erosion and generation of dust; and
- Bare areas leading to soil erosion and generation of dust as a result of ineffective establishment and growth of vegetation planted during rehabilitation of disturbed areas.

Decommissioning and Closure Phase

Closure and decommissioning of the rendering facility and its wastewater collection tank is not anticipated for the foreseeable future. Should the facility close, a detailed closure and rehabilitation plan will be submitted to the National Department of Environmental Affairs prior to decommissioning.

7.3.1 Impacts associated with the operation of the Chubby Chick rendering facility and the construction and operation of its proposed wastewater collection tank.

Table 24: Environmental impact assessment: Environment in general

Construction act Operational act Aspect: Inadequate and	nd development of management p stivities associated with the proposi ivities at the rendering facility. I/or impractical management plans	sed new wa						
	dge amongst workers and contrac ccess to the site.	ctors in term	s of how the	ir actions i	may impact on the enviror	nment.		
						Nature and significance of environmental impact		
Project Phase Applicability	Planning and Design Phase Construction Operation Decommissioning	X X X						
	1	R	sk rating (I mitigatio					
Impact Description			Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures	Timeframe	Respons
 The following impacts can be expected if proper environmental management plans are not developed and implemented: Soil-, surface water- and groundwater pollution; Generation of noise and subsequent nuisance to nearby landowners; Generation of atmospheric emissions, dust and odours and subsequent nuisance to nearby landowners; Loss or disturbance of vegetation; Loss of topsoil; Soil erosion; Disturbance of a wetland; and Contamination of surface water runoff. 		e to	3	М	These plans should describe reasonable measures to be implemented by Chubby Chick to avoid, minimise or mitigate environmental impacts.	 The following Environmental Management Plans should be developed and implemented by Chubby Chick: An environmental awareness plan. Construction contractor's plan indicating the locations of construction infrastructure including the site-camp, paint or cement cleaning pits, toilets, stores, stockpiles (topsoil and building rubble) and site office. An eradication plan for the removal of the alien and invasive vegetation (for construction and operational phases). A dangerous goods management plan based on the material safety data sheets (MSDSs) of all identified chemical substances and the 1995 Hazardous Chemical Substances Regulations in terms of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993). A waste management plan/procedure. A storm water management plan; and An odour management plan. 	Complete prior to start of construction phase.	 Chubby Construction Environ consultation
of soil and water reso	nent in general (this includes pollources, as well as harm to emplo s in terms of resource use and w	yees 3	3	М	To prevent harm to the environment by educating workers and contractors.	 The contractor is to ensure that all employees, including sub-contractors and their employees, attend onsite Environmental Awareness/Training prior to commencing work on site. Follow-up Environmental Awareness/Training may be required from time to time as new subcontractors or crews commence work or for specific activities that may potentially impact the environment. The contractor is to maintain accurate records of any training undertaken. The ECO shall monitor the contractor's compliance with the requirement to provide sufficient environmental awareness training to all site staff. All construction workers shall be issued with ID badges and clearly identifiable uniforms. 	During the construction and operational phases.	 Facility Manage ECO

		rating (a		
sibility	Probability	Magnitude	Severity	Applicable legislation / other documents
y Chick ruction ctor nmental tants	2	2	L	 NEMA, 1998 NEMWA, 2008 NWA, 1998 NEM:AQA, 2004 CARA, 1983 National Veld and Forest Fire Act, 1998 OHSA, 1993
/ Jer	2	2	L	 NEMA, 1998 NEMWA, 2008 OHSA, 1993

		Training is to cover all aspects of the EMP and procedures to be followed.
		All employees are required to attend onsite Environmental
		Awareness/Training prior to commencing work on site.
		Follow-up Environmental Awareness/Training may be required from time to
		time as new employees commence work or for specific activities that may
		potentially impact the environment.
		• The facility manager is to maintain accurate records of any training
		undertaken.

Table 25: Environmental impact assessment: Fauna and Flora (Critical Biodiversity Area 2)

 Hot work activitie Replacement of Growth of alien a Aspect: Site clearance – 	tivities associated with the propos es, smoking and cooking as part of vegetation, including rehabilitatio and invasive vegetation on site. - removal of vegetation.	of the co	onstructi	on phase									
	ires caused by workers or contrac plishment and growth of vegetation		ed durinc	rehabilita	ation of d	sturbed areas, including t	he existing earth evaporation dam and trenches.						
	en invasive vegetation.					g .							
							Nature and significance of environmental impact						
Project Phase	Planning and Design Phase Construction	Х											
Applicability	Operation	Х											
	Decommissioning												
				Risk rating (before mitigation) Environmental Maßungenerity Solution Objective Objective				Timeframe	Responsibility	Risk rating (after mitigation)			
In	Impact Description					Management / Mitigation / Monitoring Measures	Probability			Magnitude	Severity	Applicable legislation / other documents	
footprint of the waste the new wastewater co The majority of the vegetation in the vicini disturbed state. The	is vegetation outside of the constr ewater collection tank. The diame collection tank will be 10m. property is cultivated land an ity of the rendering facility is most e exact location for the prop tank is in a severely disturbed sta	ter of d the ly in a posed	3	1	L	To prevent the disturbance and loss of indigenous vegetation.	 Before any construction takes place the proposed area for the proposed new wastewater collection tank will be pegged out. All construction activities will be limited to within these areas in order to reduce the footprint disturbed and avoid impact on adjacent grasslands and wetland. Construction areas should be fenced off or barricaded prior to and during construction. Site clearance is to be limited to only the area necessary for carrying out the specified work. The site boundary is to be clearly demarcated and screened from the commencement of works. All demarcation is to be regularly maintained. No unauthorised entry, stockpiling, dumping or storage of equipment outside the site boundary is permitted. All construction activities are to be restricted within the site boundary. Removal of vegetation is to be avoided until such time as soil stripping is required. 	During construction phase, up until operation of the facility.	 Construction contractor Facility Manager ECO 	2	1	L	 NEMA, 1998 NWA, 1998

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			 Cleared indigenous vegetation can be stockpiled for possible reuse in later rehabilitation or landscaping or as a brush pack for erosion prevention. Once the construction activities have been completed, the remaining disturbed area must be top-soiled, sloped and re-vegetated as soon as possible using indigenous grass species. Exotic and invasive plant species should be eradicated as part of the construction phase as far as possible. Compacted soil should be ripped to ensure effective re-vegetation. 					
			 Soil stabilising measures could include rotovating in straw bales (at a rate of 1 bale/20m²), applying mulching or brush packing or creating windbreaks using brush or bales, where required. Equipment Basic fire-fighting equipment is to be placed at strategic locations on site and 					
Loss of indigenous grassland and habitat for indigenous fauna species surrounding the site as a result of runaway veld fires.	3	To prevent th occurrence ar spreading of a ve fire.	 must be readily available. Equipment is to be maintained in good working order to the satisfaction of local fire authorities. All personnel handling fuels and hazardous materials are to be issued with the appropriate Personal Protective Equipment (PPE). Signage Safety signage including "No Smoking", "No Naked Lights" and "Danger", and product identification signs, are to be clearly displayed on fuel storage facilities and tanks. Emergency numbers are to be clearly displayed. Training An emergency procedure, taking into consideration all potential emergencies, such as a fire outbreak, hazardous chemical spill, etc. should be compiled. It must be ensured that all employees, including sub-contractors and their 	During the construction and operational phases.	1	3	L	 NEMA, 1998 National Veld and Forest Fire Act, 1998

				 Smoking is prohibited near places where any readily combustible or flammable materials are present. Notices are to be prominently displayed prohibiting smoking in such areas. Welding, flame cutting and other hot work is only to be undertaken in places 						
				smoking in such areas.						
				where the necessary safety precautions are in place (i.e. not near potentia						
				sources of combustion and with a fire extinguisher immediately accessible).						
				 If applicable, night watchmen are to be provided with adequate cooking and 						
				heating facilities (no open fires), a suitable method of disposing of wastewate						
				and access to communication equipment.						
				No open fires are permitted.						
				Flammable materials						
				Flammable materials storage must comply with standard fire safety regulations						
				All flammable materials are to be stored in a suitable, lockable storage area.						
				Combustible materials may not accumulate on the site.						
				 Access to fuel and chemical stores should be strictly controlled. 						
				 Stockpiles of vegetation are only to be located in areas approved by the facility 						
				manager and may not exceed 2m in height. Methods of stacking must take						
				cognisance of the possible creation of a fire hazard.						
				 Burning of stockpiled vegetation is not permitted. 						
				General						
				A fire break must be created on the inside boundary fence around the property						
				The fire break must be regularly maintained (kept clear of vegetation).						
				Should the fire break be burnt, the provisions in terms of the National Veld and						
				Forest Fire Act, 1998 (Act No. 101 of 1998) must be complied with.						
				Rehabilitate the existing earth evaporation dam and wastewater trenches to as						
				close as possible to their pre-disturbance state, i.e. Rand Highveld grassland.						
Bare areas leading to soil erosion and generation of dust.				Re-vegetation by indigenous grass species.	Before					• NEMA, 1998
Ineffective rehabilitation of the existing earth evaporation	2	0	N 4	To ensure effective • Re-vegetated areas should continuously be monitored to verify whether the	completion of	Construction		4		• CARA, 1983
dam and trenches will result in these areas remaining in a	3	2	M	establishment and vegetation is growing and covering bare areas.	construction	contractor.	2	1	L	National Veld and Forest
disturbed state.				If areas show no specific vegetation growth within three months, areas shall	phase.	• ECO.				Fire Act, 1998
				receive additional topsoil, ripped to a depth of 100mm and re-planted.						
				Fertilisers can also be used to promote growth of vegetation.						
The disturbance due to construction and earth works will				Ensure all alien and invasive plants are identified on the site.						
create a window of opportunity for invasions by alien invasive				Ensure an eradication plan for the removal of the alien and invasive vegetation						
plants. Invasion of alien plants can impact on the hydrology				To control and is developed.						
and outcompete natural vegetation. Growth of alien and	_	0		eradicate alien and • Ensure all alien and invasive vegetation is removed from the site in accordance	Life of					,
invasive vegetation could also lead to smaller habitat areas	3	3	M	invasive plant with the eradication plan.	operation	Facility Manager	2	2	L	
available for indigenous vegetation. Alien and invasive plant				species. • Alien invasive vegetation must be eradicated and controlled by manual						• CARA, 1983
species also generally use more water than indigenous				removal, chemical application and/or biological control. The regulations in						
plants.				terms of the Conservation of Agricultural Resource Act, 1983 apply.						
disturbed state. The disturbance due to construction and earth works will create a window of opportunity for invasions by alien invasive plants. Invasion of alien plants can impact on the hydrology and outcompete natural vegetation. Growth of alien and invasive vegetation could also lead to smaller habitat areas available for indigenous vegetation. Alien and invasive plant	3	3	M	growth of vegetation. vegetation is growing and covering bare areas. If areas show no specific vegetation growth within three months, areas shall receive additional topsoil, ripped to a depth of 100mm and re-planted. • Fertilisers can also be used to promote growth of vegetation. • Ensure all alien and invasive plants are identified on the site. • Ensure an eradication plan for the removal of the alien and invasive vegetation is developed. • Ensure all alien and invasive vegetation is removed from the site in accordance with the eradication plan. • Alien invasive vegetation must be eradicated and controlled by manual	phase.	ECO. Facility Manager	2	2	L	

Table 26: Environmental impact assessment: Sensitive landscapes - Wetlands

Activity:

• Site clearance and construction activities associated with the proposed new wastewater collection tank. This includes earthwork activities, clearing of vegetation, disturbance of the soil surface, disturbance of slopes through the potential creation of roads and tracks and changes in runoff characteristics.

0

The alterations to the surface characteristics of the site for the purpose of constructing a new wastewater collection tank. •

Aspect:												
Site clearance	beyond the development footprint and cor	nstructior	n activitie	s in the vi	cinity of a wetland. The lo	ss of fringing vegetation and erosion as well as the alteration of natural fire regimes.						
Changes to the	e water flow regime, increasing peak flows	and dec	reased fl	ood atten	uation.							
						Nature and significance of environmental impact						
	Planning and Design Phase											
Project Phase	Construction X											
Applicability	Operation X											
	Decommissioning											
			rating (I						Risk rating (after			
		r	nitigatio	n)					I	mitigatio	1)	
Impact Description		Probability	Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures	Timeframe	Responsibility	Probability	Probability Magnitude		Applicable legislation / other documents
wastewater collection wetland. The construction as sediment entering the to turbidity. The construction act within the water reso	ity is situated 250m upslope from the delineated on the project property. The	3	3 3	Sev	To prevent disturbance and degradation of the wetland.	 No construction activities may take place within any of the wetland or wetland buffer areas. No infrastructure may be placed or erected in the wetland or wetland buffer area. Before any construction takes place the proposed area for the proposed new wastewater collection tank will be pegged out. All construction activities will be limited to within these areas in order to reduce the footprint disturbed and avoid impact on the wetland. Construction areas should be fenced off or barricaded prior to and during construction. Site clearing is to be limited to only the area necessary for carrying out the specified work. No entry, stockpiling, dumping or storage of equipment is allowed within the wetland or wetland buffer. The rendering facility must obtain a Water Use License in terms of the National Water Act (NWA), 1998 (Act No. 36 of 1998). Formalise access roads and make use of existing roads and tracks where feasible, rather than creating new routes through naturally vegetated areas. Retain vegetation and soil in position for as long as possible, removing it immediately ahead of construction/earthworks in that area (DWAF, 2005). A vegetation rehabilitation plan should be implemented. Grassland can be removed as sods and stored within transformed vegetation. The sods must preferably be removed during the winter months and be replanted by latest springtime. The sods should not be stacked on top of each other or within sensitive environs. Once construction is completed, these sods should be used to rehabilitate the disturbed areas from where they have been removed. In the absence of timely rainfall, the sods should be watered well after planting and at least twice more over the next 2 weeks. Remove only the vegetation where essential for construction and do not allow any disturbance to the adjoining natural vegetation cover. Cordon off areas that are under rehabilitation as no-go areas using danger tape and s	During construction phase, up until operation of the facility.	 Construction Contractor Facility Manager ECO 	2	2	Severity	 NEMA, 1998 NWA, 1998

				Protect all areas susceptible to erosion and ensure that there is no undue soil
				erosion resultant from activities within and adjacent to the construction camp
				and work areas.
				 and work areas. Runoff from roads must be managed to avoid erosion and pollution problems. Implement source-directed controls. Maintain buffer zones to trap sediments. Implement active rehabilitation. Implement weed control. Monitor rehabilitation and the occurrence of erosion twice during the rainy season for at least two years and take immediate corrective action where
				 Monitor the establishment of alien invasive species within the areas affected by the construction and maintenance and take immediate corrective action where invasive species are observed to establish.
The potential release of wastewater or affected stormwater into the environment can lead to further degradation of the hillside seep wetland. The wetland is in a largely modified state.	3	М	To prevent disturbance and degradation of the wetland.	A monitoring programme for the wetland and watercourses must be Life of Facility Manager 1 3 L NEMA, 1998

Table 27: Environmental impact assessment: Topsoil and erosion

Activity:												
Scheduling	for the construction phase of the pro	posed pro	oject.									
Site cleara	nce.											
Stockpiling	of topsoil and cleared vegetation.											
Landscapi	g, replacement and levelling of subso	oil and top	osoil.									
Replacem	nt of topsoil and re-vegetation.											
Vegetation	Vegetation establishment as part of the rehabilitation.											
Aspect:												
Construction	n activities scheduled during summe	r months ((raining s	season).								
Prolonged	exposure of cleared areas.											
	ng exposed to the elements.											
	placement and levelling of subsoil an	d topsoil.										
	I replacement and establishment of v											
	ory establishment of vegetation.											
							Nature and significance of environmental impact					
	Planning and Design Phase	X										
Project Phase		X	-									
Applicability	Operation	X	-									
	Decommissioning		-									
	Decenting		Risku	rating (k	hefore							
				nitigatio								
					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Environmental						
Impact Description				Ide		Objective	Management / Mitigation / Monitoring Measures	Timeframe	Responsibili			
		Probability	Magnitude	Severity								
			Prof	Mag	Sev							

sibility	rating (itigatio Buitnde W	Applicable legislation / other documents

Degradation and loss of a valuable resource (topsoil) through increased runoff as stormwater flows over cleared, bare areas during rainfall events.	3	3	М	To reduce the duration and extent of exposure of topsoil to preserve it as a resource and protect it from erosion.	If possible, schedule construction activities for dry months (winter).	Complete prior to start of construction phase.	 Construction contractor Chubby Chick 	2	1	L • NEMA, 1998
Degradation and loss of a valuable resource (topsoil). Changes in water flow regime due to the alteration of surface characteristics (the compaction of soil, the removal of vegetation, surface water redirection and the construction of infrastructure) is likely to increased peak flows and decrease flood attenuation. As the soils are highly susceptible to erosion it is likely that storm water discharge would result in erosion gullies and the loss of topsoil.	3	2	М	To reduce the duration and extent of exposure of topsoil to preserve it as a resource and protect it from erosion.	Topsoil (top 150mm) is to be stockpiled in discrete areas and retained for future landscaping efforts. Any sub-soil or rocks removed should also be stockpiled separately and be used during the rehabilitation phase. Cleared indigenous vegetation should be used as a brush pack on topsoil stockpiles for erosion prevention. Minimise the length and steepness of slopes. If sterilisation of the topsoil has occurred during stockpiling, fertilisers may be used to supplement the soils before seeding of the area takes place. Replace topsoil concurrent with construction, whenever possible. Cordon off areas under rehabilitation using danger tape. If necessary, these areas should be fenced off to prevent vehicular, pedestrian and livestock access. Aim to replace stockpiled topsoil to its original depth. Topsoil should be returned to the same area from where it was stripped. If there is not enough topsoil available from a particular soil zone, topsoil of a similar quality may be used to replace it. The suitability of substitute topsoil will be determined by a soil analysis and approved by the ECO. Compacted soil should be ripped to ensure effective re-vegetation. Re-vegetation by indigenous grass species. If areas show no specific vegetation growth within three months, areas shall receive additional topsoil, ripped to a depth of 100mm and re-planted. Soil stabilising measures could include rotovating in straw bales (at a rate of 1 bale/20m²), applying mulching or brush packing, or creating windbreaks using brush or bales.	During construction phase, up until operation of the facility.	 Construction contractor ECO 	1	2	L • NEMA, 1998
Erosion of cleared areas. Changes in water flow regime due to the alteration of surface characteristics (the compaction of soil, the removal of vegetation, surface water redirection, the construction of infrastructure) is likely to increased peak flows and decrease flood attenuation. As the soils are highly susceptible to erosion it is likely that storm water discharge would result in erosion gullies and the loss of topsoil.	3	2	м	To minimise the duration of exposure of cleared areas and to limit erosion of subsoil.	The contractor is to ensure that all reasonable measures are taken to limit erosion during the construction phase. Erosion protection measures include sand bags, cut-off drains and/or berms. Placement of erosion prevention structures such as cement, rock or vegetation (grass) to reduce water velocity at concentration points within the drainage system, if required. Cleared indigenous vegetation can be stockpiled for possible reuse in later rehabilitation or landscaping, or as a brush pack for erosion prevention. Removal of vegetation is to be avoided until such time as soil stripping is required.	During construction phase, up until operation of the facility.	Construction contractor.ECO	2	2	L • NEMA, 1998
Ineffective rehabilitation causing soil erosion and the generation of dust.	3	3	М	To ensure proper replacement of subsoil and topsoil to promote effective rehabilitation of disturbed areas.	Replacement and rehabilitation should be progressive during the project and not left until the end. Implementation of effective and sustainable rehabilitation and remediation practices. Cordon off areas under rehabilitation using danger tape. If necessary, these areas should be fenced off to prevent vehicular, pedestrian and livestock access. Disturbed areas must be cleared of any building rubble or other debris. All weeds must be removed prior to soil replacement. Subsoil must be used to fill in excavations around the rendering facility and associated infrastructure.	Before completion of construction phase.	 Construction contractor. ECO. 	2	2	L • NEMA, 1998

	• The disturbed area must be top-soiled, sloped and re-vegetated as soon as
	possible using indigenous grass species.
	If sterilisation of the topsoil has occurred during stockpiling, fertilisers may be used
	to supplement the soils before seeding of the area takes place.
	Aim to replace stockpiled topsoil to its original depth.
	Topsoil should be returned to the same area from where it was stripped.
	• If there is not enough topsoil available from a particular soil zone, topsoil of a
	similar quality may be used to replace it. The suitability of substitute topsoil will be
	determined by a soil analysis and approved by the ECO.
	Compaction must be minimised by using the correct equipment. Excessively heavy
	vehicles should not be used to replace the soil. A dozer must be used instead of a
	grader.
	Compacted soil should be ripped to ensure effective re-vegetation.
	Soils should ideally only be moved when dry.
	• Soil stabilising measures could include rotovating in straw bales (at a rate of 1
	bale/20m ²), applying mulching or brush packing or creating windbreaks using
	brush or bales.

Table 28: Environmental impact assessment: Soil, surface water, stormwater and groundwater pollution

Act	<u>ivity</u> :										
•	Design of the w	astewater collection tank.									
•	The handling, s	torage, mixing and disposal of cer	ment and	concrete.							
•	The cleaning of	equipment and construction areas	s.								
•	Handling, storag	ge and disposal of general/domes	tic and ha	izardous waste.							
•	Installation and	use of ablution facilities.									
•	Storage and ha	ndling of hazardous chemical sub	stances,	fuels, greases and oils. Vehicle and equipment maintenance and refuelling.							
•	Design of waste storage facilities and/or areas.										
•	Handling, stora	ge and processing of incoming wa	ste from	abattoirs.							
•	Generation and	storage of wastewater.									
•	Handling and st	orage of coal.									
•	The burning of o	coal in the boilers to generate stea	am.								
•	Rain events and	d rain water (stormwater) flowing t	hrough th	e site.							
Asp	<u>bect</u> :										
•	Inadequate des	ign of the wastewater collection ta	ınk.								
•	Concrete and co	ement spillage.									
•	Generation and	runoff of contaminated wash wate	er.								
•	Poor waste mar	nagement.									
•	Unsanitary cond	ditions on site.									
•	Poor managem	ent and spills of hazardous chemi	cal subst	ances, fuel, greases and oils. Leaking equipment or vehicles and/or spillage of fuels, greases and oils.							
•	Inadequate des	ign of waste storage facilities and/	or areas.								
•	Poor managem	ent of incoming waste from the ab	attoirs.								
•	Inefficient mana	agement and storage of wastewate	er genera	ted at the rendering facility.							
•	Poor managem	ent and spillage of coal.									
•	Generation of b	oiler ash.									
•	'Clean' rainwate	er (stormwater) running into 'dirty'	areas.								
				Nature and significance of environmental impact							
F	Project Phase	Planning and Design Phase	Х								
	Applicability	Construction	Х								
				(//							

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	Operation X											
	Decommissioning		rating (b nitigatior						Risk rating (after mitigation)			
Impact Description			Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures	Timeframe	Responsibility	Probability -	Appli Magnitude Severity		Applicable legislation / other documents
	and groundwater pollution during the to inadequate design of the wastewater		4	Н	To ensure adequate design of the wastewater collection tank.	 The wastewater collection tank must be positioned so that it is not subject to flooding and must be situated above the 1:100 year floodline. The wastewater collection tank must be designed to contain all wastewater generated at the rendering facility on a daily basis. Sumps and pumps must also be designed taking the necessary production rate into account. The wastewater collection tank must be sited taking electricity usage into account. Gravity flow must be used wherever possible. The wastewater collection tank must be installed with an impermeable PVC liner. Pipelines conveying wastewater must be manufactured to be or painted a conspicuous colour, distinctly different from the colour of pipes that are used to convey clean water. The following conditions were abstracted from the Department of Water Affairs' Replacement of General Authorisation in terms of Section 39 of the NWA, 1998 (Act 36 of 1998), 18 December 2009: Structures and hardened surfaces associated with the water use must not- Be erosive; Be structurally unstable; Induce any flooding; or Be a health and safety hazard. The water use must not result in a potential, measurable or cumulative detrimental- Change in the stability of the watercourse; Scouring, erosion or sedimentation of a watercourse; or Decline in the diversity of communities and composition of the natural, endernic vegetation. The water use must not result in a potential, measurable or cumulative detrimental change in the equality, velocity, pattern, timing, water level and assurance of flow in a watercourse. The water use must not result in a potential, measurable or cumulative detrimental change in the water quality characteristics of the watercourse. The water use must not result in a potential, measurable or cumulative detrimental change in the water quality characteristics of the watercourse. The water use must	Complete prior to start of construction phase.	 Chubby Chick Engineering contractor Wastewater collection tank designer 	1	2	L	 NEMA, 1998 NWA, 1998
Soil and surface management of ceme	water pollution due to the incorrect ent and concrete.	3	4	Н		 Cement may only be mixed on an impermeable surface (not on bare soil). Dry cement must be removed from the soil surface to prevent an impermeable layer forming on top of the soil. The cement must be disposed of together with any building rubble. 	During construction phase, up until	Construction contractorECO	2	3	М	• NEMA, 1998

· · · · · · · · · · · · · · · · · · ·					
				improper handling, storage, mixing or disposal of cement and concrete. To prevent the	 foundations or a dedicated cleaning pit is permitted. Bricklayers and plasterers are to minimise any cement spill or runoff in their work area and are to ensure that the work area is cleaned of all cement spillage at the end of each workday. Both used and unused cement bags are to be stored in weatherproof containers so as not to be affected by rain or runoff. Contaminated soil resulting from concrete or cement spills, including residue produced by the washing of cavities, are to be removed immediately after the spillage has occurred and placed on the appropriate rubble stockpile. Runoff from the washing out of wall cavities is to be contained against the building by excavations or berms around the foundations. All reasonable measures must be taken to prevent the dirty water from contaminating a watercourse. No washing of vehicles is permitted on site.
Soil and surface water pollution due to the release of contaminated wash water into the environment.	3	4	Н	pollution of soil and surface water bodies, including wetlands, through contaminated wash water. An example of this would be water that is contaminated with cement or concrete.	 A dedicated temporary cleaning area is to be identified to facilitate washing of all cement and painting equipment. The cleaning area could be a plastic lined cleaning pit or dedicated plastic or metal drums, located as close as possible to a water point. No wastewater/wash water may be disposed of on site, onto the soil or into any water body. Runoff from the washing activities is to be contained against the building by
Soil, surface water and groundwater pollution from irresponsible waste management practices. Nuisance caused by odours and unsightly appearance of waste onsite.	3	3	М	To prevent soil, surface and groundwater pollution and nuisance due to poor waste management.	 hazardous waste must be demarcated accordingly. Waste material may only be temporarily stored at areas demarcated for such storage practices. General waste shall be stored in a manner that prevents the harbouring of pests.
Soil, surface water and groundwater pollution as a result of unsanitary conditions onsite.	3	3	М	Prevent soil, surface and groundwater pollution from unsanitary conditions onsite.	wetland. construction contractor • The location of toilets shall be located within 100m of any work point. and e ECO 2 2 L • NEMA, 1998

				 facilities are not spilled on the ground at any time. Ablution facilities are to be serviced weekly or more frequently if required. The contractor is to ensure that no spillage occurs and that the contents are removed from site on a regular basis. Ablution facilities shall be inspected and maintained to prevent and minimise blockage and leakages. Toilets should have properly closing doors and be supplied with toilet paper. Awareness of the importance of proper hygiene should be created among employees. Routine maintenance must be undertaken. Implement the water monitoring programme. Undertake regular geohydrological studies to determine the impact of the rendering facility on the groundwater resource. Regular review of the monitoring programme by a competent person to identify areas of improvement as well as areas that require attention. Identify all hazardous chemical substances used onsite including fuel, greases and oils. Obtain the material safety data sheet of each of hazardous chemical substance. Ensure that the material safety data sheets have sufficient information to enable the user to take the necessary measures to protect his/her health and safety and that of the environment.
Soil, surface water and groundwater pollution. Toxic contaminants such as metal ions (e.g. copper, lead and zinc) and hydrocarbons can detrimentally impact upon the water quality of the area.	4	3	H To prevent and minimise soil and water pollution as a result of poor management and accidental spills of hazardous chemical substances, fuel, greases and oils used onsite, including from leaking equipment or vehicles.	 Material Safety Data Sheets for all hazardous chemical substances must be readily available on site. Keep a stock inventory register of all chemicals in the store. Powders must be stored above liquids. Proper storage of chemicals in a lockable, well ventilated building. Ensure adequate access control for the storage area. Storage areas for hazardous chemicals are to comply with standard fire safety regulations. Safety signage including "No Smoking", "No Naked Lights" and "Danger", and product identification signs, are to be clearly displayed in areas housing chemicals. Appropriate equipment to deal with emergency spill incidents is to be readily available on site. This includes fire extinguishers, spill kits for hydrocarbon spills, drip trays for equipment and/or machinery leaks, drums or containers for contaminated water

					 Ensure that any spilled chemical cannot exit the designated storage area by constructing a berm or bump at the exit, or store chemicals in a spill tray. Immediately clean all spillage of fuels, lubricants and other petroleum based products. No hazardous chemical must be discarded in the sewage or stormwater system. Train staff on the use of chemicals in accordance with the risks as described in the material data sheets. After construction, the land must be cleared of rubbish, surplus materials, and equipment, and all parts of the land shall be left in a condition as close as possible to that prior to use. Ensure that maintenance work does not take place haphazardly, but, according to a fixed plan, from one area to the other. Maintenance of construction vehicles. Control of waste discharges in a responsible manner. Guidelines for implementing Clean Technologies must be considered. Maintenance of wetland buffer zones to trap sediments with associated toxins. Inspection and maintenance of equipment, generators, diesel tank and vehicles owned by Chubby Chick shall take place on a regular basis. Equipment, generators, diesel tanks and vehicles are to be repaired immediately upon developing leaks. Drip trays are to be inspected daily for leaks and effectiveness and emptied when necessary. This is to be closely monitored during rain events to prevent overflow. Soil contaminated with hazardous substances, fuel or oil shall be treated as hazardous waste and removed from site. The diesel storage tank and bund wall must undergo a yearly integrity assessment. 			
Soil, surface water and groundwater pollution. Nuisance caused by odours and unsightly appearance of waste onsite.	3	4	Н	To prevent soil, surface and groundwater pollution and nuisance as a result of poor waste management (waste generated at the facility and not including incoming waste from the abattoirs for processing at the rendering facility).	 Hazardous waste storage areas must be registered with the competent authority. The location of hazardous waste storage areas must be in accordance with GNR. 926 of 29 November 2013 (National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008): National Norms and Standards for the storage of waste). Waste storage facilities must have correct access control and signage as stipulated in GNR. 926 of 29 November 2013. Waste storage facilities must be operated as stipulated in GNR. 926 of 29 November 2013. All waste storage containers must comply with the conditions as stipulated in GNR. 926 of 29 November 2013. All waste storage containers must comply with the conditions as stipulated in GNR. 926 of 29 November 2013. Training must be provided continuously to employees working with waste. The training programme must include the provisions stipulated in GNR. 926 of 29 November 2013. An Emergency Preparedness Plan must be compiled in accordance with GNR. 926 of 29 November 2013. Monitoring, auditing, reporting and record keeping must be conducted in accordance with GNR. 926 of 29 November 2013. Take note that hazardous waste includes ash, empty hazardous chemical substance containers, soil and material (e.g. cloths) contaminated by hazardous chemical substances, etc. Installation of sufficient waste bins, skips or bulk containers, where necessary. The design of the bins, skips or bulk containers must ensure containment to prevent 	Life operation	of	Facility Mar

<i>A</i> anager	2	2	L	 NEMA, 1998 NEM:WA, 2008

					seepage, must be covered to prevent water ingress and must be placed on
					impermeable surfaces within bunded areas.
					All containers (bins, skips or bulk containers) shall be kept in a clean and hygienic manner.
					Containers (bins, skips or bulk containers) utilised for the disposal of general and
					hazardous waste must be demarcated accordingly.
					Waste material may only be temporarily stored at areas demarcated for such
					storage.
					General waste shall be stored in a manner that prevents the harbouring of pests.
					 General and hazardous waste should always be stored and disposed of
					separately.
					General and hazardous waste should be disposed of in appropriately demarcated
					bins. Bins are then emptied into appropriately demarcated skips or bulk containers
					once a day or more often, if required.
					 Skips or bulk containers should be removed to a nearby landfill site on a regular
					basis. No build-up of waste is permitted onsite.
					Safe disposal certificates should be requested from general and hazardous landfill
					sites with every waste disposal. Waste may only be disposed of at landfill in
					accordance with the Norms and Standards for Disposal to Landfill as stipulated in
					Section 7(1) of the NEMWA, 2008.
					These safe disposal certificates should be kept on file to illustrate compliance with
					the cradle to grave principle.
					All waste generated at the facility must be classified in terms of GNR. 634 of 23
					August 2013 (National Environmental Management: Waste Act, 2008 (Act No. 59
					of 2008): Waste Classification and Management Regulations) excluding waste
					listed in Annexure 1 of the regulations.
					Safety data sheets must be obtained or prepared for all hazardous waste, such as
					boiler ash, generated at the facility, as stipulated in GNR. 634 of 23 August 2013.
					All waste storage containers must be labelled, as stipulated in GNR. 634 of 23
					August 2013.
					Detailed records must be kept of all waste generated, as stipulated in GNR. 634
					of 23 August 2013. This includes the classification of the waste, quantities of waste
					generated and re-used, recycled, recovered, treated or disposed of (in tons or m ³
					per month), and by whom the waste was managed.
					Waste manifest documents must be compiled for all hazardous waste generated
					onsite, as stipulated in GNR. 634 of 23 August 2013 (specifically Annexure 2).
					All waste transporters must also complete waste manifest documents for each load
					of waste transported, as stipulated in GNR. 634 of 23 August 2013 (specifically
					Annexure 2).
					Waste manifest documentation must be retained for a period of at least five (5)
					years.
					No incineration of any kind of waste will be permitted onsite.
					Implement the water monitoring programme.
					Undertake regular geohydrological studies to determine the impact of the
					rendering facility on the groundwater resource.
					Regular review of the monitoring programme by a competent person to identify
					areas of improvement as well as areas that require attention.
Soil, surface water and groundwater pollution. Nuisance caused	3	4	н	To prevent soil,	Waste storage areas must be registered with the competent authority.
by odours and unsightly appearance of waste onsite.				surface water and	• Waste storage areas must be registered with the competent authomy. operation operation

Incoming abattoir waste and mortalities from the chicken farms are stored in an enclosed waste intake area.				groundwater pollution and nuisance as a result of poor management of incoming waste from the abattoirs (waste to be processed at the rendering facility).	 The location of hazardous waste storage areas must be in accordance with GNR. 926 of 29 November 2013 (National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008): National Norms and Standards for the storage of waste). Waste storage facilities must have correct access control and signage as stipulated in GNR. 926 of 29 November 2013. Waste storage facilities must be operated as stipulated in GNR. 926 of 29 November 2013. All waste storage containers must comply with the conditions as stipulated in GNR. 926 of 29 November 2013. Training must be provided continuously to employees working with waste. The training programme must include the provisions stipulated in GNR. 926 of 29 November 2013. An Emergency Preparedness Plan must be compiled in accordance with GNR. 926 of 29 November 2013. An Emergency Preparedness Plan must be compiled in accordance with GNR. 926 of 29 November 2013. Monitoring, auditing, reporting and record keeping must be conducted in accordance with GNR. 926 of 29 November 2013. Store incoming waste in a roofed area. Incoming waste should be processed in a timely manner (i.e. when fresh) or should be refrigerated. No incoming waste may accumulate in open areas not designated for its storage prior to processing. Waste manifest documents must be obtained for each load of incoming waste from the abattoirs, as stipulated in GNR. 634 of 23 August 2013 (specifically Annexure 2). All waste transporters must also complete waste manifest documents for each load of waste transported, as stipulated in GNR. 634 of 23 August 2013 (specifically Annexure 2). 		
					 Waste manifest documentation must be retained for a period of at least five (5) years. Implement the water monitoring programme. Undertake regular geohydrological studies to determine the impact of the rendering facility on the groundwater resource. Regular review of the monitoring programme by a competent person to identify areas of improvement as well as areas that require attention. 		
Soil, surface water and groundwater pollution due to the inadequate containment of wastewater in the wastewater collection tank and sewage in the conservancy tank.	3	4	Н	To ensure adequate management and storage of wastewater and sewage generated onsite.	 Conduct yearly integrity inspections/assessments on the PVC liner inside of the wastewater collection tank. Check the wastewater level inside of the wastewater collection tank, and the sewage level inside the sewage conservancy tank, on a daily basis to ensure that the containment facilities are emptied before they reach their maximum containment capacity. Obtain a contract/agreement with the local municipality/other entity for the acceptance and treatment of the wastewater and sewage generated onsite. Sufficient capacity must exist at the receiving facility to accommodate the rendering facilities' wastewater and sewage volumes. All reasonable measures must be taken to prevent failures and malfunctions of the wastewater collection tank and sewage conservancy tank. Implement a preventative maintenance programme. 	Life of operation	Facility Ma

∕lanager	1	3	L	 NEMA, 1998 NEM:WA, 2008 NWA, 1998

Coal ash contains heavy metals and metalloids such as, Pb and Se. These contaminants can leach into groundwater discharging at discharge zones into spruits and rivers. Deterioration of surface water quality within the adjacent wetland area and downstream water resources may take place as a result of affected surface water runoff generated at the coal ash storage area. Exposure to coal ash may result in a decrease in pH and exposure to chemical compounds such as arsenic, lead, mercury, selenium, aluminium, barium, boron and chorine. Coal ash has leachate potential and may contaminate ground- and surface water resources.	5	4	н	To prevent soil, surface and groundwater pollution as a result of poor ash management. To prevent the contamination of 'clean' stormwater in 'dirty' areas through	 areas of improvement as well as areas that require attention. The temporary storage of ash within an undesignated area (bare ground) on the premises is not good practise and should not be continued. Temporary storage of ash should take place within designated areas isolated from the clean surface runoff environment on an impermeable surface, preferably bunded and roofed. The coal ash must be disposed of or managed in accordance with its waste classification. Should ash be disposed of off-site, a safe disposal certificate must be obtained from the licensed waste disposal site. Should ash be supplied to a third party for recycling or re-use, Chubby Chick should ensure that the third party is licensed for the recycling or re-use and a waste manifest document must be obtained. The following mitigation measures have been extracted from the Stormwater Management Plan for the rendering facility and correspond to the figure below. It is recommended to redefine the current diversion berm around the rendering facility's dirty area. The newly constructed berm should be vegetated to limit erosion. 2c and 2d are no longer relevant to the proposed project as the wastewater treatment plant will no longer be built and the earth evaporation dam will no longer be lined. Instead, the wastewater will be contained in a wastewater collection tank before its disposal offsite. The earth evaporation dam and trenches will be rehabilitated. 	Life of operation	Facility Manager	2 4	 NEMA, 1998 NEMA, 1998 NEMA, 1998
Soil, surface water and groundwater pollution due to the incorrect management of coal. Contaminated surface water runoff may enter the adjacent wetland area. Deterioration of surface water quality within the adjacent wetland area and downstream water resources may take place as a result of affected surface water runoff from the coal storage area. Exposure of runoff water to coal may result in a decrease in pH. Coal is currently stored at the rendering facility in a concrete bunker next to the boilers.	3	2	M	To ensure the proper handling and storage of coal.	 ensure that the containment capacity of the collection facilities is not compromised. Flow meters must be used to record the volume of wastewater taken to the collection tank, and sewage taken to the sewage conservancy tank, on a daily basis. Records must be kept of the volume of wastewater and sewage disposed of at the local municipality's sewage treatment works, on a daily basis. Upgrade the coal storage area to limit any possible exposure of surface water runoff. The coal storage area should be bunded and roofed to prevent any possible exposure of clean surface water. Prevent coal spillages during loading and remove any coal spillages from the soil and return it to the coal bunker. Implement the water monitoring programme. Undertake regular geohydrological studies to determine the impact of the rendering facility on the groundwater resource. Regular review of the monitoring programme by a competent person to identify areas of improvement as well as areas that require attention. 	Life of operation	Facility Manager	2 2	• NEMA, 1998



Continual investigation should be done to ensure the protection of water		
resources.		
Erosion of access roads should be addressed by implementing energy dissipaters		
to drain surface runoff away from the roads into the adjacent areas.		

Table 29: Environmental impact assessment: Atmosphere and Noise

Activity:

- Scheduling of the construction phase for the proposed project.
- Excavation activities, loading and offloading activities and vehicles travelling to and from the site.
- Construction workers, vehicles, machinery and general noisy construction activities on site.
- General operational activities at the rendering facility.
- Burning of coal in boilers to generate steam.

Aspect:

- Construction activities occurring during inconvenient times of the day.
- Dust generation.
- Generation of noise and nuisance.
- Odour emissions from the rendering process.
- Combustion emissions from the burning of coal in the boilers.

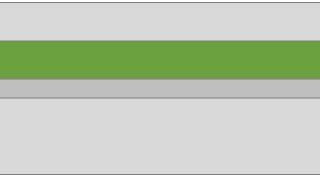
	Nature and significance of environmental impact													
	Planning and Design Phase	Х												
Project Phase	Construction	Х												
Applicability	Operation	Х												
	Decommissioning													
				rating (nitigatio							rating (hitigatio			
Impact Description		Probability	Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures	Timeframe	Responsibility	Probability	Magnitude	Severity	Applicable legislation / other documents		
construction activities day. Noise disturbance sensitive receptors d According to Jorger generated by genera reach levels of app heavy machinery. It of development will hav noise of the area on of Sound is inversely p and can get absorbed	and nuisance to neighbours as a s occurring during inconvenient time and nuisance to neighbours an lue to operational activities. Insen & Johnson (1981), the nois I construction activities on a building proximately 70dB, caused by for can therefore be assumed that the p ve a negative impact on the enviro ce construction starts.	es of the d other e levels g site can instance proposed onmental e source rs. Noise	3	3	М	To maintain a dB reading of less than 50dB at the site boundary and minimise nuisance to neighbours.	 Schedule activities that will generate the most noise during times of the day that will result in least disturbance to neighbours. Site workers and contractors will adhere to the requirements of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) regarding hearing protection and noise control measures. Regular maintenance of vehicles and equipment. All equipment and machinery should be fitted with adequate silencers. Working hours should be restricted to daylight hours. No sound amplification equipment such as sirens, loud hailers or hooters are to be used on site except in emergencies and no amplified music is permitted on site. If work is to be undertaken outside of normal work hours permission must be obtained from the ECO and the facility manager. No noisy work is to be conducted over the weekends or on public holidays. A complaints register must be kept onsite. The register must record the following: Date when complaint was received, name of person who reported the complaint, details of the complaint and when and how concern was addressed. 	Pre- construction, construction and operational phases.	 Chubby Chick Construction contractor 	2	2	L	 NEMA, 1998 OHSA, 1993 NEM:AQA, 2004 	

The noise decline curve gives an indication of how noise					
generated at the site will decrease with distance. It gives an					
indication of the distance that the sound would have travelled					
upon reaching a level of 60 dB, prescribed by the SABS as being					
the acceptable limit for environmental noise. According to noise					
decline curve, at a distance of 27 metres from the construction					
site, the generated noise would have decreased to a level of 60					
dB and at a distance of 45 metres it would have decreased to					
approximately 55dB. It can therefore be said that noise travelling					
further than 45 metres will have a low impact on neighbouring					
farms and residential areas.					
The distance to sensitive noise receptors (residences) is more					
than 45 metres in all cases.					
Ambient air quality degradation as well as disturbance and nuisance to neighbours and other sensitive receptors due to dust generated from onsite traffic.	4	2	М	To minimise the impact of excavation activities, loading and offloading activities and vehicles travelling to and from the site on	 that could result in the generation of dust. Regular maintenance of vehicles to address wear of tires and breaks. Optimal engine combustion will allow for 'cleaner' exhaust emissions. If the soil is compacted open areas should be ripped fertilised and re-vegetated During the construction and Facility Facility Z L NEMA, 1998 NEMA, 2004
				the ambient air quality.	A complaints register must be kept onsite. The register must record the following: Date when complaint was received, name of person who reported the complaint, details of the complaint and when and how concern was addressed.
Disturbance and nuisance to neighbours and other sensitive receptors due to offensive odours generated by the rendering facility.					Avoid receiving aged raw material (mortalities from farms, feathers, Dead-On- Arrivals, condemned carcasses after de-feathering, condemned material from inspection points at evisceration and other places where condemned material can be generated, floor waste and blood) by better supply chain management through
Odours are mostly caused by volatile organic compounds (VOCs) and these are the main atmospheric emissions generated at rendering facilities. VOC emissions can be made up of all or some of the following compounds: ammonia, organic					the implementation of a waste management procedure for the abattoirs and chicken farms. Image: Chicken farms. • All material received for rendering must be processed within 24 hours. Image: Chicken farms.
sulphides, particulates, hydrogen sulphide, trimethylamine, disulphides, quinoline, C-4 and C-7 aldehydes, C-4 amines, C-3 to C-6 organic acids, dimethyl pyrazine and other pyrazines. Small volumes of the following may also be emitted: ketones,				To avoid and/or	Alternatively, carcases must be refrigerated at the facility where it is generated to avoid decomposition of material. Image: Composition of material. • Maintain good housekeeping and prevent build-up of raw material such as feathers, condemned carcasses, floor waste and blood. Image: Composition of material such as feathers and blood.
aromatic compounds, C-4 to C-7 alcohols and aliphatic hydrocarbons. Many of the compounds have low odour detection thresholds, with some as low as one (1) part per billion (ppb). Quinoline is the only compound that is classified as a hazardous air pollutant (HAP).	5	4	Н	minimise the generation of odourants at the rendering facility.	 Minimise odour concentrations within the overall building headspace air, principally by covering or enclosing the source of odour and concentrating localised extraction directly from the covered or enclosed odour sources. Design, construct and maintain well-sealed buildings. Doorways may therefore need to be protected by fast acting doors, self-closers, air "curtains" or, in the
In an Atmospheric Impact Assessment conducted for the Chubby					extreme, air lock compartments.
Chick rendering facility it was determined that the current					plans for odour control equipment failures and breakdowns.
scenario/situation at the facility would only exceed the odour					Investigate the effect that different stack designs would have on the odour impact.
benchmark (1.5 OUE/m3, as a 98th percentile of hourly means					The impact of odours can be reduced by improving mixing and dispersion e.g. by
over a calendar year) approximately 300m from the eastern					the use of tall stacks.
boundary of the site. In the simulations the benchmark was not		1			
-					Chubby Chick rendering facility has installed two condensers and a biofilter for the
exceeded over any of the surrounding residences. Note that for this study a control efficiency of 79.8% (Sironi S <i>et al.</i> , 2007) was					Chubby Chick rendering facility has installed two condensers and a biofilter for the treatment of odorous emissions from their pressure cooking vessels.

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of Facility Manager	5	3	н	NEMA, 1998NEM:AQA, 2004
	of Facility Manager	of Facility Manager 5	of Facility Manager 5 3	of Facility Manager 5 3 H

Table 30: Environmental impact assessment: Infrastructure

Activity:									
Increased traffic	Increased traffic frequency on road infrastructure during the construction phase.								
Aspect:	Aspect:								
Wear of access roads and insufficient vehicle inspections.									
			Nature and significance of environmental impact						
	Planning and Design Phase								
Project Phase	Construction	Х							
Applicability	Operation	Х							
	Decommissioning								



	Risk rating (before mitigation)								c rating			
Impact Description	Probability	Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures	Timeframe	Responsibility	Probability	Magnitude	Severity	Applicable legislation / other documents	
Wear of access roads, accidents on access roads, unpermitted transport of materials and loss of materials being transported on access roads.	4	2	М	To minimise the impact of an increase in traffic on access roads to the facility, during the construction phase, as well as a minimisation of the impacts during the operational phase (no increased traffic to the facility).	 Ensure that all vehicles using access roads are roadworthy. All loads are to be securely fastened when being transported. All vehicles are to adhere to the tonnage limitation and acquire a permit as required. All speed limits and other traffic regulations on the public roadways must be adhered to. 	During the construction and operational phases.	 Facility Manager ECO 	2	2	L	• NEMA, 1998	

Table 31: Environmental impact assessment: Resource usage

Activity:									
Usage of resources, such as electricity and water (groundwater).									
<u>Aspect</u> :									
Inefficient and response in the second	edundant use of valuable resourc	es (elect	ricity and	groundw	ater).				
							Nature and significance of environmental impact		
	Planning and Design Phase								
Project Phase	Construction	Х]						
Applicability	Operation	Х	-						
	Decommissioning								
				rating (b nitigatio					
Impact Description			Probability	Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures	Timeframe	Respo
	n of a valuable resources (grour inefficient or redundant usage.	ndwater	3	3	М	To prevent the wastage or depletion of a valuable resources (groundwater and electricity).	 General Ensure that all employees have been informed on the importance of natural resources (proper environmental training and awareness). Supervisors to inspect the operations regularly to determine areas of improvement with regards to resource consumption. Regular maintenance and inspection of equipment such as hose pipes, to prevent leaks. Monitoring of resource consumption. Identify areas where resource consumption. Identify technologies and practices that may reduce resource consumption. Implementation of technologies and practices that can reduce resource consumption. 	During the construction and operational phases.	 Facili Mana ECO

		rating (itigatio		
onsibility	Probability	Magnitude	Severity	Applicable legislation / other documents
ility nager D	2	1	L	 NEMA, 1998 NWA, 1998

		Water
		 Water Regular inspection and maintenance of all boreholes, JoJo tanks, reservoirs, toilets, water pipes and taps. Leaking JoJo tanks, reservoirs, taps, toilets and pipes are to be repaired immediately. Running water taps and pipes may not be left unattended. All pipe, hose and tap connections are to be fitted with correct and appropriate plumbing fittings. Groundwater may only be abstracted from the offsite borehole in accordance with the General Authorisations for the taking of groundwater (Section pending IWWMP provisions and subsequent Water Use License that will be issued by (a) water use. The quantity of groundwater abstracted on a daily basis must be metered or gauged. Records must be kept of all abstractions. All measuring devices must be properly maintained, must be in good working order and must be easily accessible. This shall include a programme of checking,
		calibration, and/or renewal of measuring devices.The site Water Balance must be compiled and improved and updated as and when required.
		 Electricity Save electricity by turning off lights and computers when leaving the office. Halogen light bulbs convert approximately 80% of the energy used into heat rather than light. Replace spent light bulbs with energy saving CFLs (compact fluorescent lights) or newer and more efficient LEDs (light-emitting diodes). Improve energy efficiency by insulating cold storage buildings, if applicable. The use of multi-effective evaporators can be considered to recover evaporative energy in the rendering process.

Table 32: Environmental impact assessment: Hygiene

Activity:	Activity:									
Operational acti	Operational activities at the rendering facility, especially with regards to the handling of incoming poultry and other waste.									
Aspect:										
Unsanitary conc	litions at the rendering facility.									
							Nature and significance of environmental impa	act		
	Planning and Design Phase									
Project Phase	Construction									
Applicability	Operation	Х								
	Decommissioning		-							
				Risk rating (before mitigation)						
Impact Description			Probability	Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures Timeframe			Respon
Outbreak of diseases and possible infection of workers at the facility.			3 3 M			To maintain clean conditions at the rendering facility, to minimise the risk of an	Store incoming waste in an enclosed or at least roofe Incoming waste should be processed in a timely man be refrigerated.		Life of operation	Facility M
Outbreak of diseases and possible infection of workers at the						To maintain clean conditions at the rendering facility, to	ncoming waste should be processed in a timely man			Fa

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		rating (
onsibility	Probability 3	itigatio Magnitude	Severity	Applicable legislation / other documents
Manager	2	2	L	NEMA, 1998OHSA, 1993

		outbreak of disease	Access control to and from the premises and access to the premises should only
		and to keep	be by prior arrangement.
		employees healthy.	Installation of footbaths with disinfectant at all the entrances to the rendering
			facility.
			Installation of showers for all staff working on site.
			Encourage workers to wash hands regularly.
			Provide workers associated with the wastewater treatment works with adequate
			PPE, such as waterproof shoes or boots and rubber gloves.
			Installation of rodent bait traps and flytraps.

Table 33: Environmental impact assessment: Heritage

Activity:										
Site clearance.										
Aspect:	artefacts or sites of cultural heritag	ne (archae)	ologica	l and his	storical)	significance				
			ologica			significance.	Nature and significance of environmental impact			
	Planning and Design Phase									
Project Phase	Construction	X								
Applicability	Operation	X								
	Decommissioning									
			Risk	rating (I	before					
			m	nitigatio	on)					
Impact Description		-	Probability	Magnitude	Severity	Environmental Objective	Management / Mitigation / Monitoring Measures	Timeframe	Respon	
Loss of artefacts or sites protected by the National Heritage Resources Act, 1999 (Act No. 25 of 1999). The area to be disturbed for the construction of the wastewater collection tank is very small (a round tank with a 10m diameter). The site investigation by Mr Pelser of APelser Archaeological Consulting found that the proposed area for the wastewater collection tank is in a severely disturbed state. If any sites or features of heritage origin or significance used to be located at the proposed site, they would have been destroyed in the past. Mr Pelser motivated based on his findings that a full Heritage Impact Assessment is not required for the proposed project. SAHRA, in their letter dated 10 February 2016, indicated that they agree with the findings of Mr Pelser and that they have no objections to the proposed development, on condition that the conditions contained in their letter are adhered to. The conditions are contained in this table and have also been added to the EMP. It is unlikely that any artefacts or sites of cultural heritage		stewater ameter). sological stewater sites or cated at he past. Heritage project. ited that have no that the to. The so been	1	3	L	To protect artefacts or sites of cultural heritage (archaeological and historical) significance.	 Should any objects of archaeological or palaeontological remains be found during construction activities, work must immediately stop in that area and the Environmental Control Officer (ECO) must be informed. The ECO must inform the South African Heritage Recourse Agency and contact an archaeologist and/or palaeontologist, depending on the nature of the find, to assess the importance and rescue them if necessary (with the relevant SAHRA permit). No work may be resumed in this area without permission from the ECO and SAHRA. If the newly discovered heritage resource is considered significant a Phase 2 assessment may be required. A permit from the responsible heritage authority will be needed. No sites, features or objects may be disturbed (e.g. picked up) by employees. 	During construction phase, up until operation of the facility.	 Facility Manag ECO 	
(archaeological and historical) significance will be disturbed or discovered during the operational phase as no undisturbed areas will be disturbed.		urbed or	N/A							

Risk rating (after mitigation) Applicable legislation / other documents Insibility Image of the second					
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	ager	1	3	L	

Refer to Part 8 below for a summary on the key findings related to the operation of the Chubby Chick rendering facility and its proposed upgrades and new wastewater collection tank.

7.3.2 Cumulative Impacts

Cumulative impacts refer to the situation where an activity may in itself not have a significant impact, but may become significant when added to the existing and potential impacts from similar or different activities in the area.

The following potential cumulative impacts have been identified:

Activity	Aspect	Cumulative Aspect
Operational	Generation of odorants	The generation of odorous emissions is generally the most
activities at the	and subsequent	significant issue at a rendering facility and the subsequently
rendering facility.	nuisance to neighbours	caused nuisance is the main negative impact associated with
	and other sensitive	rendering facilities. The odours generated at the rendering
	receptors.	facility may have a cumulative impact when combined with
		other sources of odourous emissions in the area. These
		include chicken farms that are known for the generation of
		odourous ammonia emissions. There are a number of chicken
		farms within a 5km radius from the rendering facility.
		The installed biofilter should minimise the release of odorous
		emissions from the rendering facility.
Release of	Pollution and	Cumulative negative impacts on the groundwater resource
wastewater into	degradation of	results from a combination of the operations at the rendering
the environment.	groundwater resources.	facility, such as the historic storage of coal ash on bare soil and
		the discharge and seepage into the ground of ineffectively
		treated wastewater. The storage of the coal ash has likely
		resulted in the generation of leachate. It is proposed to
		effectively contain the rendering facility wastewater in a
		wastewater collection tank and thereby eliminate the release
		of wastewater into the environment.

Table 34: Cumulative impacts

8. ENVIRONMENTAL IMPACT STATEMENT

8.1 Summary of key findings

The Application process for a Waste Management Licence in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), has been initiated to authorise existing and proposed waste management activities at the Chubby Chick rendering facility, including the construction of a new wastewater collection tank (upgrading of the existing wastewater management system at the rendering facility).

Licensing will ensure that the rendering facility can operate for the long term without facing liabilities in terms of non-compliance to environmental legislation and the new wastewater collection tank will ensure that the rendering wastewater is effectively contained so as to prevent its release into the environment and the potential pollution that accompanies such a release.

All alternatives will have an impact on the environment. The main negative impacts from the rendering facility and its proposed upgrades are summarised as follows:

- Soil-, surface water- and groundwater pollution;
- Generation of noise and subsequent nuisance to nearby landowners;
- Generation of atmospheric emissions, dust and odours and subsequent nuisance to nearby landowners;
- Loss or disturbance of vegetation;
- Loss of topsoil;
- Soil erosion;
- Potential disturbance of a wetland; and
- Contamination of surface water runoff.

8.2 Comparative assessment of positive and negative implications of the proposed activity and alternatives

Part 6 of this final EIR contains a detailed investigation and assessment of the alternative options for the rendering facility and its proposed upgrades and new wastewater collection tank. The positive and negative implications of each alternative are also described in the table below.

From the table below, one can see that most of the significant impacts of the current rendering facility (such as the release of ineffectively treated wastewater into the environment) will be mitigated by the proposed construction of the new wastewater collection tank. Consequently, the No-go option has more negative impacts than the Development Option.

Alternative **Positive impacts Negative impacts** The proposed wastewater collection tank will effectively contain the wastewater from the rendering facility until it can be removed offsite for disposal at a suitable facility (local municipal sewage treatment works). Wastewater from the rendering facility will therefore no longer be Rendering released into the environment. Additional disturbance and destruction of a small area of severely facility disturbed vegetation onsite. licensing and The existing earth wastewater evaporation dam and trenches will be . the rehabilitated. Noise pollution during the construction phase. construction of The rendering facility will be licensed in terms of the National Possible generation of odours and other atmospheric emissions during . а new Environmental Management: Waste Act, 2008. Licensing will entail the the operational phase. wastewater stipulation of various mitigation and management measures by the Generation of traffic during the construction phase. collection tank various competent authorities, all of which will result in the facility being managed in a more environmentally responsible manner. Additional job opportunities and stimulation of the economy during the construction phase of the project. Continued pollution of soil, surface water and groundwater resources due to the release of ineffectively treated wastewater into the environment. Continued contamination of stormwater ("clean" rainwater) flowing No new disturbance of remaining undeveloped, but severely disturbed, through the site as it comes into contact with "dirty areas". areas on site. **No-go option** Continued degradation of the hillside seep wetland onsite through the No additional short-term impacts on the environment due to discharge of ineffectively treated wastewater into the environment. construction activities. Continued degradation of the vegetation onsite through the discharge of ineffectively treated wastewater into the environment. Continued potential for pollution from infiltration of wastewater from the existing earth evaporation dam.

Table 35: Comparison of the alternatives (identified in section 6 of this report) and the no-go option

9. CONCLUSION

Information has been provided to the National Department of Environmental Affairs and Interested and Affected Parties during the Scoping- and EIA Phases. Comments and concerns were received and integrated into this Environmental Impact Assessment Report. This document serves as the final report to be considered by the registered I&APs and state departments. Should there be any final comments received on this report within the notice period provided, these comments will be submitted to the competent authority, the National Department of Environmental Affairs, for final perusal and decision making.

This EIA process has been carried out in accordance with the NEM:WA, 2008, NEMA, 1998, and the Regulations there under.

The positive and negative impacts of all the alternatives have been identified and assessed in Chapter 6. The No-Go Option was found to have a large negative impact on the environment, while the Development Option has an overall score of zero (negative and positive impacts cancelling each other out). The following improvements will occur at the rendering facility as part of the development option and these cancel out the current negative environmental impacts of the rendering facility:

- A wastewater collection tank will be installed to contain all wastewater generated from the rendering facility and ensure no further negative impact on fauna, flora and sensitive environments;
- The existing earth wastewater evaporation dam and wastewater trenches will be rehabilitated;
- The rendering facility will be licensed in terms of the National Environmental Management: Waste Act, 2008. Licensing entails the stipulation of various mitigation and management measures by the various competent authorities, all of which will result in the facility being managed in a more environmentally responsible manner; and
- A Provisional Atmospheric Emission Licence has also been issued for the rendering facility by the North West Department of Rural, Environmental and Agricultural Development and a Waste Use Licence application will be submitted to the Department of Water and Sanitation in due course.

The above mentioned improvements will decrease the environmental impact of the rendering facility, below current, No-Go Option levels.

The following main potential environmental impacts have been identified as part of this Environmental Impact Assessment process:

- Soil-, surface water- and groundwater pollution;
- Generation of noise and subsequent nuisance to nearby landowners;
- Generation of atmospheric emissions, dust and odours and subsequent nuisance to nearby landowners;
- Loss or disturbance of vegetation;
- Loss of topsoil;

- Soil erosion;
- Disturbance of a wetland; and
- Contamination of surface water runoff.

Appropriate mitigation measures will assist in minimising the potential impacts on the surrounding environment during the construction and operational phases of the proposed project. The main mitigation measures that should be applied to the rendering facility include the following:

- Environmental Awareness Training for all contractors and workers;
- A complaints register must be kept on site to record and deal with complaints from people in the vicinity of the site;
- Before any construction takes place the proposed area for the proposed new wastewater collection tank will be pegged out. All construction activities will be limited to within these areas in order to reduce the footprint disturbed and avoid impact on the wetland;
- The wastewater collection tank must be designed to effectively contain the wastewater from the rendering facility until such time as it can be removed offsite for disposal;
- The wastewater collection tank must be designed to contain the required volume of wastewater, taking expected/planned removal frequencies into consideration;
- Soil, stormwater and groundwater pollution must be prevented through the correct handling, storage and disposal of cement, concrete, waste and chemicals;
- A Water Use Licence must be obtained for all water use activities occurring onsite;
- Adequate firefighting equipment must be available on site;
- The conditions of the rendering facility's Atmospheric Emission Licence must be adhered to;
- Implement the recommendations of the Odour Management Plan;
- All recommendations in the Stormwater Management Plan must be implemented;
- Implement the Water Monitoring Programme;
- If any sites, features or objects are found during site clearance, all activities must cease and a heritage expert must be contacted to investigate the site;
- The provisions of the National Norms and Standards for the Storage of Waste must be implemented, where required;
- Regular site inspection by supervisors;
- Process incoming waste in a timely manner;
- Schedule activities that will generate the most noise during times of the day that will result in least disturbance to neighbours;
- Undertake regular geohydrological studies to determine the impact of the rendering facility on the groundwater resource;
- The coal ash must be disposed of or managed in accordance with its waste classification; and
- Implementation of effective and sustainable rehabilitation and remediation practices.

Based on the outcomes of the Environmental Impact Assessment, conducted as part of this full Scoping and Environmental Impact Assessment process, as well as the alternatives assessment, the following recommendations are made:

- The proposed project/activity (the upgrading and licensing of the rendering facility as well as the construction of the new wastewater collection tank) should be authorised and allowed to proceed on the preferred site (26°47'16.80"S; 27°08'58.39"E);
- 2. The mitigation measures proposed in this report and the draft Environmental Management Programme must be implemented during all phases of the proposed project;
- 3. It is assumed that the wastewater collection tank will operate as designed and will effectively contain all rendering facility wastewater prior to its removal offsite for disposal;
- 4. It is assumed that the wastewater volumes generated at the rendering facility will not exceed the design capacities of the wastewater collection tank;
- It is assumed that the mitigation measures proposed in this report and the draft Environmental Management Programme will be correctly implemented by the applicant and that they will be effective;
- 6. A communications pathway must be established that would allow the designated ECO to accept and deal with stakeholder complaints;
- 7. Proposed mitigation measures should be incorporated as far as possible into the operational plan for the rendering facility; and
- 8. Strict monitoring and enforcement of requirements of the EMP must be undertaken to ensure that contractors and operators adhere to these requirements.