



IVECO SOUTH AFRICA (PTY) LTD

## PROPOSED CONSTRUCTION OF A NEW IVECO PLANT IN ROSSLYN, GAUTENG

**Motivation Letter** 

Issue Date: 18 July 2013

**Revision No.: 1** 

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### 1 INTRODUCTION

A Joint Venture (JV) company between Iveco South Africa (Pty) Ltd and the Larimar Group plan to lease and possibly purchase Erf 72 Rosslyn Ext. 1, the Gauteng Province, for the purposes of establishing a new Iveco vehicle assembly plant (hereafter referred to as the, "proposed development").

There is currently existing infrastructure on the site which is understood to be restored and upgraded as part of the future proposed development. The total area of the study site is 18 hectares, with existing buildings on the site which will be upgraded, refurbished and restored. A new construction area of approximately a hectare will be extended from the existing infrastructure.

The Joint Venture has appointed SiVEST to undertake a legislative review of the National Environmental Management Act (No. 108 of 1998) to determine whether Environmental Authorisation for this proposed development is required. SiVEST have considered, in detail, the following legislation:

- National Environmental Management Act (Act No. 107 of 1998) as amended;
- Environmental Impact Assessment Regulations (2010);
- National Water Act (Act No. 36 of 1998);
- National Environmental Management: Waste Act (Act No. 59 of 2008);
- National Environmental Management: Air Quality Act (Act No. 39 of 2004).

It is the opinion of SiVEST Environmental (Independent Environmental Assessment Practitioner - EAP) that **no activities** identified in the aforementioned listing notices trigger any of the listed activities and there is no need to undertake an Environmental Authorisation assessment process.

In order to confirm this, SiVEST arranged a site visit at the proposed development area with representatives from the Gauteng Department of Agriculture and Rural Development (GDARD). This site visit was undertaken on Tuesday the 11<sup>th</sup> June 2013. The representatives present from GDARD were Mr. Musa Mangobe and Mr. Tebogo Leku. During the site visit Mr. Mangobe and Mr. Leku verbally confirmed that there was no need for an Environmental Authorisation process to be undertaken. The main reasons being that the scope of the proposed development did not fall within the ambit of any listed activities in terms of the Environmental Impact Assessment Regulations (2010) Listing Notices, the degraded state of the site, the fact that the proposed development will be in an area already zoned as industrial and no sensitive or critical biodiversity areas or features would be affected by the proposed development.

This motivation letter therefore serves to highlight that the necessary environmental impact listing notices have been consulted, and demonstrates that the project scope does not fall within the ambit of any of the listed activities in terms of the Environmental Impact Assessment Regulations (2010) Listing Notices.

### 2 PROJECT LOCATION

A Joint Venture (JV) company between Iveco South Africa (Pty) Ltd and the Larimar Group plan to lease and possibly purchase the aforementioned property for the purposes of establishing a new vehicle assembly plant (hereafter referred to as the, "proposed development").

The proposed development is located in Rosslyn, within the jurisdiction of the City of Tshwane Metropolitan Municipality, Gauteng Province. It is situated with the industrial zone in Rosslyn (Figure 1). The proposed development is located on a site that was previously owned by the Nissan/Tata and it has not been used for approximately 7 years.

The proposed site can be accessed through Dodd Street and it is situated opposite the Nampak Bevcan Plant.

There is currently existing infrastructure on the site which is understood to be restored and upgraded for the future proposed development. The total area of the study site is 18 hectares, with existing buildings on the site which will be restored. The new construction area of approximately a hectare will be extended from the existing infrastructure. The current and proposed site layout is provided in Figure 2 and 3 below.

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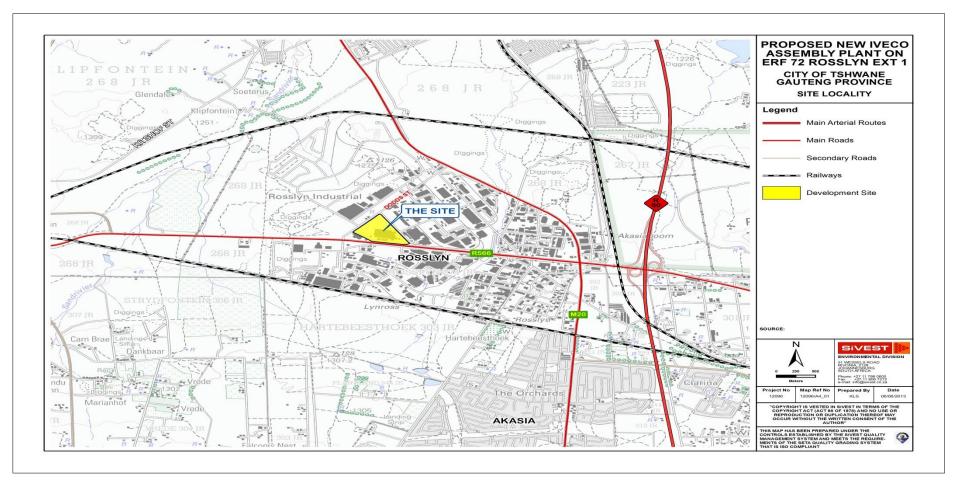


Figure 1: Site plan of the proposed development

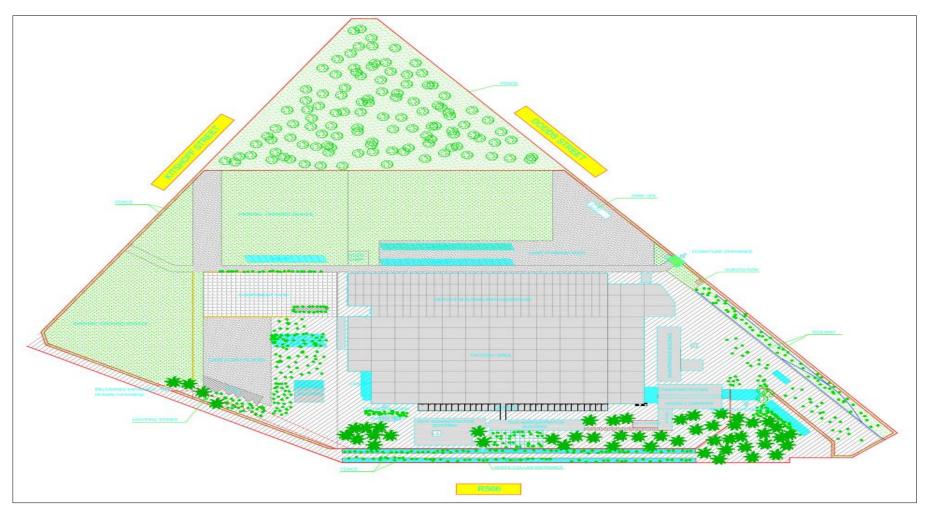


Figure 2: Current / existing Site Layout Plan

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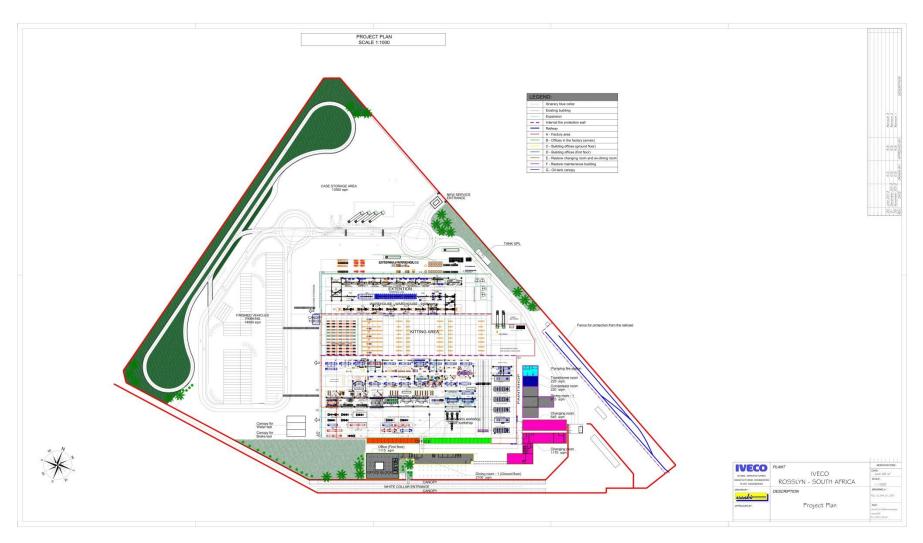


Figure 3: Proposed Draft Site Layout

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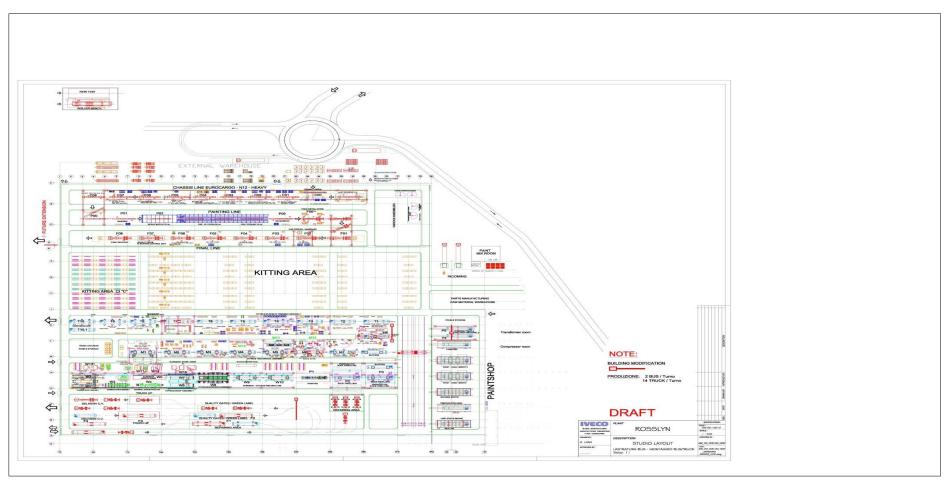


Figure 4: Proposed Draft Technical Detail Site Layout

### 2.1 **Project Details**

The main purpose of the new Iveco plant will be for the assembly of busses and trucks. The new plant will include the following main activities:

- Office Block
- Warehousing
- **Paintshops**
- Kitting Areas
- Parking Area
- Water Test

The following infrastructure is existing on site:

- LPG Tank this will be removed as scrap as soon as possible;
- Paintshop this will be removed as scrap as soon as possible; and
- Below ground fuel tanks (these have previously been decommissioned and filled with water. Iveco plan to maintain these tanks (fill them with water) and remove them at a later stage.

The activities listed above will necessitate that the following onsite chemicals / wastes are available:

- Diesel Fuel Tanks and distribution into the building
- Lubricant distribution into the building
- Oil/sand separators for drainage of asphalted surfaces, water test, natural gas for paint ovens, hot water preparation and kitchen
- Diesel tank for emergency generator
- Solid waste treatment station
- Welding Gas distribution and storage
- Sealant and glue storage and distribution
- Mobile Washing Unit (using the manual high pressure water cleanser- [Kärcher type] to hose down the dust accumulated on the parts stored outside)
- Chemicals / dangerous liquids storage area
- Waste storage area

The amount of chemicals and potentially dangerous liquids that will be on site all fall below the thresholds of any of the listed activities in the previously mentioned legislation that SiVEST considered.

Below are the storage quantities for Diesel and Lubricants proposed to be used on site: Diesel:

1 x 23,000 litre above ground storage tank (this will be supplied and fully installed by the fuel supplier)

Lubricants:

- 1 x 40m² external store with a containment wall and suspended floor (this store will need to be constructed)
- Quantities as listed below:
  - SAE15W40 Urania LD7 Engine oil 2 x 210 litre
  - SAE 10W40 Urania 100K Engine oil 2 x 210 litre
  - SAE 80W90 Tutela ZC 90 Gear oil 2 x 210 litre
  - o 75W80 Synthetic Tutela FE-Gear Gear oil 2 x 210 litre
  - SAE 85W140 Tutela W140-M/DA Axle oil 2 x 210 litre
  - o ATF DEXRON II Tutela GI/A Power Steering oil 2 x 210 litre
  - o NLGI-2/3 Tutela MR2 Grease 2 x 20 kg
  - o PARAFLU II 50%/50% Anti-freeze 6 x 210 litre
  - o Tutela DOT Special or DOT-4 Brake Fluid 2 x 20 litre
  - Windscreen Washer Fluid 2 x 50 litre

The below tables indicate the type and volumes of the following chemicals and materials proposed to be used on site:

- Oil lubricants (type and volume)
- Liquids (type and volume)
- Gases (type and volume)
- Glueing materials (type and volume)
- Paint materials (type and volume)

Waste management on site will be a strictly controlled process. Any Hazardous waste on site will be removed immediately to a company that is licensed to remove, handle and dispose of hazardous waste. The solid waste on site will be separated and sorted and will not exceed the 100m³ limit represented in the Waste Management act (National Environmental Management: Waste Act (Act No. 59 of 2008).

Table 1: Type and volume of oil lubricants proposed to be used on site

		OILS - LUBRICANTS			
					Total quantity at
Material name	Classification	Material description	Utilisation	Quantity/veh	production/ year
URANIA LD5	Directive 67/548/EEC: R38, R41, Xi	Mineral oil - Turbo LD 15W40	Engine	23	143 589
URANIA LD7 (NOTE: it substitutes URANIA LD5, out of production)	Product not classified as Hazardous. Information on ingredients (hazardous components): Directive 67/548/EEC: R38, R41, R51/53, Xi, N				
TUTELA_ZC_90	Product not classified as Hazardous. Information on ingredients (hazardous components): Directive 67/548/EEC: R38, R41, R51/53, Xi, N	Mineral Oil - ZC 90/ SAE 80W/90	Gearbox	13	81 159
TUTELA_LHM	Product not classified as Hazardous. Information on ingredients (hazardous components): Directive 67/548/EEC: R65, Xn	Mineral Oil	Tilting cab system	0,6   - 2	12 486
TUTELA_DOT_SPECIAL	Product not classified as Hazardous. Information on ingredients (hazardous components): Directive 67/548/EEC: R41, R22, R36, Xi, Xn Regulation (EC) n° 1272/2008: H318, H302, H319	Syntetic liquid	Clutch	0,5   -1,7	10 613
TUTELA_GI/A	Product not classified as Hazardous. Information on ingredients (hazardous components): Directive 67/548/EEC: R36, R22-R34-R43-R52/53, Xi, C	Mineral Oil	Power steering unit	1,2  - 4	24 972
URANIA_W140/M-DA	Product not classified as Hazardous. Information on ingredients (hazardous	(SAE 85 W 140)	Front/rear axle	0,2   (front axle) / 18/19   (rear axle)	118 617
TUTELA_MR2	Product not classified as Hazardous.	Grease based on lithium soap	Telescopic bar (gearbox) general purpose	0,0010 kg	6
TUTELA_MR3	Product not classified as Hazardous.	Grease	wheels, hub and general	0,0010 kg	6
TUTELA_COMAR 2	Product not classified as Hazardous. Information on ingredients (hazardous components): Directive 67/548/EEC: R51/53, R52/53, N	Grease	wheels, hub and general	0,0010 kg	6

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Table 2: Type and volume of liquids proposed to be used on site

		LIQUIDS				
Material name	Classification	Material description	Utilisation	Quantity/veh	Total quantity at nominal production	Stored quantity on site: 5 working days
DIESEL 1999	Directive 67/548/EEC: R20-R65, R38, R40, R51/53, Xn, Xi, N Regulation (EC) n° 1272/2008: H226, H304, H315, H332, H351, H373, H411	Gasoil	Truck	Min. 31   / Max 87	374 580	
PARAFLU_11	Directive 67/548/EEC: R22, R36, R60-61, R8-25-50, Xn, Xi, O, T, N Regulation (EC) n° 1272/2008: H 302-373, H319-360FD, H400-301-272	Concentrated antifreezing liquid	Engine	Min. 16   / Max 29,2	182 296	
Sulfuric acid for batteries	Directive 67/548/EEC: R35, R36, R38, C	Sulfuric Acid 37%	Battery	aprox. 9,7 kg	60 682	1 319
TUTELA PROFESSIONAL SC35	Directive 67/548/EEC: R11-36-67, Xi, F Regulation (EC) n° 1272/2008: H319-225- 336	Detergent liquid ( windscreen washing)	Windscreen tank	51	31 215	

Table 3: Type and volume of gases proposed to be used on site

	GAS							
Material name	Classification	Material description	Utilisation	Quantity/veh	Total quantity at nominal production	Stored quantity on site: 5 working days		
R134 A	Directive 67/548/EEC: R59, N Regulation (EC) n° 1272/2008: H280	Refrigerant liquid / freon		0,460 kg-1,25 kg	7 804	170		
Argonshield Welding gas	Product not classified as Hazardous. Regulation (EC) n° 1272/2008: H280	Welding Gas	Bus Frames	3 x 17kg = 51kg	45 339	986		

Table 4: Type and volume of Glueing Materials proposed to be used on site

		Glueing materia	als			
Material name	Classification	Material description	Utilisation	Quantity/veh	Total quantity at nominal production	Stored quantity on site: 5 working days
Betaseal 1407	R20, R36/37/38, R42, R42/43, Xn,	PU glue	Roof	8x600ml =4,8 l	4 267	93
Betaseal 1407	R20, R36/37/38, R42, R42/43, Xn,	PU glue	paneling	40x600ml =3.4 l	3 023	66
Pekay V440 Adhesive	TBD	PU glue	carpet	6 x 5lt =30 Litres	26 670	580
Sika Lastomer 710	R10, R20, R65, R36/37/38, R51/53, R52/53, Xn, Xi, N	PU glue	windshield	12 x 330ml = 3,96 l	3 520	77
Betaprime 5402	F, Xn, R11, R48/20, R40, R36/37/38, R42/43, R67, R52/53	Primer	Roof	3x250ml = 750ml	667	14
Betaprime 5402	F, Xn, R11, R48/20, R40, R36/37/38, R42/43, R67, R52/53	Primer	Paneling	11x250ml =2750ml	2 445	53
Betawipe Activator VP04604	F, Xi, R11, R36, R43, R67	Primer	Windows	1 x 250ml =250ml	222	5
Betaprime 5500	F, Xn, R11, R20, R42/43, R36, R66, R52/53	Primer	windshield	6 x 250ml = 1500ml	1 334	29

Table 5: Type and volume of Euromidi paint materials proposed to be used on site

1) EUROMIDI	Material name	Classification	Consumption per vehicle	/ year	Stored quantity on site: 5 working days
1) EUROIVIIDI	iviateriai fiame	1) EUROMIDI	(kg)	(kg)	working days
UBS	Betaguard DC600	Xi, R10, R43	66.3	44 753	973
Sealer	Körapop 223 EB weiß	Xn, Xi, R10, R20, R38	16.8	11 340	247
Primer	VS4 Flexprimer/ DP59844 FLEX PRIMER VS1	F, Xn, Xi, R10, R11, R20, R20/21, R36, R36/37, R38, R66, R67	19.23	12 980	282
TopCoat (including medium quantities for decorations)	IMRON(R) 704 (MIXED COLOR) - LEADCHROMATE FREE/ CENTARI(R) 600 BASECOAT LACQUER (MIXED COLOR) - LEADCHROMATE/ RKAL69269C 2K CLEAR	Xn, N, R10, R11, R20, R 20/21, R36, R36/37/38, R37/38, R37, R38, R41, R43, R51/53, R52/53, R65, R66, R67	27.03	18 245	397
Thinners and cleaning solvents	XB387 HI-TEMP THINNER / AB385 CENTARI(R) 600 HI- TEMP THINNER / TH01119 B200LT THINNER FOR IMRON/ CS640 PERCOTOP(R) THINNER EXTRA SLOW	Xn, N, R10, R11, R20, R 20/21, R36, R36/37/38, R37, R38, R51/53, R52/53, R65, R66, R67	26.74	18 050	392
Hardener	AK260 HIGH SOLIDS ACTIVATOR /BK220 BASECOAT CHIP PROTECTOR	Xn, R10, R11, R20, R20/21, R36, R36/37/38, R37, R37/38, R 38, R42/43, R52/53, R65, R66, R67	8.41		123

Table 6: Type and volume of Citelis paint materials proposed to be used on site

2) CITELIS	Material name	Classification	Consumption per vehicle (kg)	Quantity / year (kg)	Stored quantity on site: 5 working days
,	<u> </u>	2) CITELIS	1 0/	<del>( 0)</del>	<u> </u>
Chassis Sealer UBS	Betaguard DC600	Xn, Xi, R10, R20, R38 Xi, R10, R43	7.5 96		35 447
Panel and roof sealant			2.4	514	11
Sealer	Körapur 125	Xn, R42, R 10, R20, R20/21, R36/37/38, R37,R38, R42/43, R51/53, R 53, R65, R66, R67	12.3	2 632	57
Black Top Coat		Xn, N, R10, R11, R20, R 20/21, R36, R36/37/38, R37/38, R37, R38, R41, R43, R51/53, R52/53, R65, R66, R67	4.2	899	20
Top coat one tone		Xn, N, R10, R11, R20, R 20/21, R36, R36/37/38, R37/38, R37, R38, R41, R43, R51/53, R52/53, R65, R66, R67	14.3	3 060	67

Table 7: Type and volume of Chassis paint materials proposed to be used on site

3) Chassis painting	Material name	Classification  3) Chassis painting	Consumption per vehicle (kg)	Quantity / year (kg)	Stored quantity on site: 5 working days
		Xn, N, R10, R11, R20, R 20/21,			
Thinners and cleaning		R36, R36/37/38, R37, R38,			
solvents		R51/53, R52/53, R65, R66,			
		R67	1.5	9 044	197
		Xn, R10, R11, R20, R20/21,			
Hardener		R36, R36/37/38, R37, R37/38,			
That defici		R 38, R42/43, R52/53, R65,			
		R66, R67	1.8	10 852	236
		Xn, N, R10, R11, R20, R 20/21,			
		R36, R36/37/38, R37/38, R37,			
TopCoat		R38, R41, R43, R51/53,			
		R52/53, R65, R66, R67	5.3	31 954	695

**Table 8: General information- Exhaust air Paint shops** 

Item	Length m	Width m	Volume m3/h
Touch up			
Booth 1	22	6	190 080
Booth 2	16	6	138 240
Bus frame touch up	18	6	155 520
Bus paint shop			
Sanding Booth	36	6	54 000
UBS Booth	18	6	38 880
Paint booth	20	6	172 800
Oven			6 000
Chassis paint shop	18	6	155 520
Oven			7 000
Paint mix room	12	15	24 750

**Table 9: General information- Plant capacity** 

	2014	2015	2016	2020
N12	-	678	1.166	1.797
Eurocargo	252	579	773	895
Trakker	353	774	1.014	1.174
Stralis	260	708	750	868
682	-	368	535	619
Euromidi	156	471	621	676
Citelis *	-	131	170	214
Total	1.019	3.709	5.029	6.243

<sup>\*</sup> Both CKD chassis assembly and Body Building

Based on the detailed project information provided, SiVEST understands that all chemicals that are proposed to be used on site fall below the thresholds represented in the National Environmental Management Act (Act No 107 of 1998) EIA Regulations (18 June 2010). Therefore no listed activities are triggered.

Additionally, all emissions and quantities of waste do not fall within the ambit of the listed activities in terms of the National Environmental Management: Air Quality Act (Act No. 39 of 2004 and the National Environmental Management: Waste Act (Act No. 59 of 2008) respectively.

### 3 MOTIVATION

In terms of the EIA Regulations promulgated in terms of Chapter 5 of the NEMA on the 18<sup>th</sup> of June 2010, Government Notice (GN) No. R. 544 Listing Notice 1, R. 545 Listing Notice 2 and R. 546 Listing Notice 3, SiVEST believe that no environmental authorisation will be required as no listed activities seem to be triggered by the proposed development.

An environmental screening investigation was undertaken by SiVEST in conjunction with IVECO, to determine the various potential authorisation, license and permits requirements for the proposed development in terms of environmental legislation. The legislation examined included:

- National Environmental Management Act (Act No. 107 of 1998) as amended;
- Environmental Impact Assessment Regulations (2010);
- National Water Act (Act No. 36 of 1998);
- National Environmental Management: Waste Act (Act No. 59 of 2008);
- National Environmental Management: Air Quality Act (Act No. 39 of 2004).

Ultimately, several activities in terms of the legislation above were identified that <u>may</u> be relevant to the proposed development (please see the below tables). However, consultation with the relevant and competent authorities have been undertaken and <u>the need for Environmental Authorisation process has been ruled out and this has been confirmed by GDARD based on the site visit that was undertaken in June 2013.</u>

Table 10: Potentially Relevant legislation - Government Notice. R544 - Listing Notice 1 of 2010

Listed	activities as described in GN R.544 and 546 Listing Notices 1 and 3	Relevance to
of 2010		the proposed
		development
Govern	nment Notice. R544 - Listing Notice 1 of 2010	
9	The construction of facilities or infrastructure exceeding 1000	Not likely
	metres in length for the bulk transportation of water, sewage or	
	storm water -	
	(i) with an internal diameter of 0,36 metres or more; or	
	(ii) with a peak throughput of 120 litres per second or more,	
	excluding where:	
	a. such facilities or infrastructure are for bulk	
	transportation of water, sewage or storm water or	
	storm water drainage inside a road reserve; or	
	b. where such construction will occur within urban areas	
	but further than 32 metres from a watercourse,	
	measured from the edge of the watercourse.	

10	The construction of facilities or infrastructure for the transmission	Not likely
	and distribution of electricity -	
	(i) outside urban areas or industrial complexes with a capacity	
	of more than 33 but less than 275 kilovolts; or	
	(ii) inside urban areas or industrial complexes with a	
	capacity of 275 kilovolts or more.	
11	The construction of:	Not likely
	(i) canals;	
	(ii) channels;	
	(iii) bridges;	
	(iv) dams;	
	(v) weirs;	
	(vi) bulk storm water outlet structures;	
	(vii) marinas;	
	(viii) jetties exceeding 50 square metres in size;	
	(ix) slipways exceeding 50 square metres in size;	
	(x) buildings exceeding 50 square metres in size; or	
	(xi) infrastructure or structures covering 50 square metres or	
	more	
	where such construction occurs within a watercourse or within 32	
	metres of a watercourse, measured from the edge of a	
	watercourse, excluding where such construction will occur behind	
	the development setback line.	
23	The transformation of undeveloped, vacant or derelict land to –	Not likely
	(i) residential, retail, commercial, recreational, industrial or	
	institutional use, inside an urban area, and where the	
	total area to be transformed is 5 hectares or more, but less than 20 hectares, or	
	(ii) residential, retail, commercial, recreational, industrial or	
	institutional use, outside an urban area and where the	
	total area to be transformed is bigger than 1 hectare but	
	less than 20 hectares; -	
	except where such transformation takes place for linear activities.	
27	The decommissioning of existing facilities or infrastructure, for	Not likely
	(i) electricity generation with a threshold of more than	
	10MW; (ii) electricity transmission and distribution with a threshold	
	of more than 132kV;	
	(iii) nuclear reactors and storage of nuclear fuel;	
L		1

	(iv) activities, where the facility or the land on which it is	
	located is contaminated ;	
	(v) storage, or storage and handling, of dangerous goods of	
	more than 80 cubic metres;	
	but excluding any facilities or infrastructure that commenced	
	under an environmental authorisation issued in terms of the	
	Environmental Impact Assessment Regulations, 2006 made under	
	section 24(5) of the Act and published in Government Notice No.	
	R. 385 of 2006, or Notice No. 543 of 2010.	
28	The expansion of existing facilities for any process or activity	Not likely
	where such expansion will result in the need for a new, or	
	amendment of, an existing permit or license in terms of national	
	or provincial legislation governing the release of emissions or	
	pollution, excluding where the facility, process or activity is	
	included in the list of waste management activities published in	
	terms of section 19 of the National Environmental Management:	
	Waste Act, 2008 (Act No. 59 of 2008) in which case that Act will	
	apply.	
39	The expansion of	Not likely
	(i) canals;	
	(ii) channels;	
	(iii) bridges;	
	(iv) weirs;	
	(v) bulk storm water outlet structures;	
	(vi) marinas;	
	within a watercourse or within 32 metres of a watercourse,	
	measured from the edge of a watercourse, where such expansion	
	will result in an increased development footprint but excluding	
	where such expansion will occur behind the development setback	
	1	

Table 11: Potentially Relevant legislation - National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)

National Er	Relevance to the	
No. 59 of 2008)		proposed
		development
		(Yes/Possibly)
Category	Storage of Waste	Not likely
Α	(1) The storage, including the temporary	
(1),	storage, of general waste at a facility that	
	has the capacity to store in excess of	
	100m <sup>3</sup> of general waste at any one time,	
	excluding the storage of waste in lagoons.	
Category	The sorting, shredding, grinding or bailing of	Not likely
A (5)	general waste at a facility that has the capacity	
	to process in excess or one ton of general waste	
	per day.	
Category	Reuse, recycling and recovery	Not likely
A (6)	(6) The scrapping or recovery of motor vehicles	
	at a facility that has an operational area in	
	excess of 500m <sup>2.</sup>	
Category	The recycling or re-use of general waste of more	Not likely
A (7)	than 10 tons per month.	

With regards to the NWA, it is not envisaged that any impact as a result of the proposed development will trigger a Water Use License or Government Notice 1199 since the wetland is located off the proposed development site and no water use will be triggered in terms of water uses (c) and (i).

The current site has existing infrastructure on it that is to be renovated (See site photos attached in appendix F). The surrounding area is completely transformed and in a poor state. SiVEST believe that the implementation of the proposed development will restore and improve nature of the site dramatically.

Furthermore, the proposed development will have a positive impact on the socio-economic conditions of the Tshwane area. The new plant is planning to employ approximately 1000 blue collar employees and 100 white collar employees by in 2019 or 2020, the full operational phase, which will boost the area significantly. SiVEST therefore also believe that the significant socio-economic benefits of the proposed development will contribute greatly to the local communities as well as the local and national economy.

Based on the legislation reviewed in tables 10 and 11 above, and subsequent to a thorough investigation of the project detail, description and facts, the need for Environmental Authorisation process has been ruled out.

### 4 CONCLUSION

This motivational document has sought to assess, from a legal perspective, and confirm that an Environmental Authorisation process will not be required for the proposed development. This motivation established on a legal basis that the proposed development activities will not trigger any of the listed activities contained within R. 544 Listing Notice 1, R. 545 Listing Notice 2 and R. 546 Listing Notice 3 as read in terms of the National Environmental Management Act (No. 108 of 1998) and the Environmental Impact Assessment Regulations (2010) as well as the National Water Act (No 36 of 1998), the National Environmental Management: Waste Act (Act No. 59 of 2008) and the National Environmental Management: Air Quality Act (Act No. 39 of 2004).

The current site has existing infrastructure on it that is to be renovated (See site photos attached in appendix F). The surrounding area is completely transformed and in a poor state. SiVEST believe that the implementation of the proposed development will restore and improve the nature of the site dramatically.

As such, the Joint Venture (JV) Company between Iveco South Africa (Pty) Ltd and the Larimar Group request official correspondence from the Gauteng Department of Agriculture and Rural Development confirming that no environmental authorisation is required and that the proposed development may commence.



### **SiVEST Environmental Division**

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## Appendix A Draft Maps and Layout Plans



## Appendix B Site Investigation Wetland Report



# Appendix C Project Presentation from Iveco



## Appendix D Minutes of Authority Meeting



### **Appendix E**Site Photos