

COMMENTS AND RESPONSES REPORT

1 INTRODUCTION

All issues, comments and concerns raised by interested and affected parties (I&APs) were noted and collated into the Comments and Response Report (CRR). The CRR for the Final Scoping Report (DSR) indicates the form and scope of the issues that are to be addressed during the EIA application process. The Scoping Phase of the proposed project to date followed an integrated public participation (PP) process.

2 ABBREVIATIONS

CBA	Cost Benefit Analysis
CoT	City of Tshwane
CRR	Comments and Response Report
DMR	Department of Mineral Resources
DME	Department of Minerals and Energy
DSR	Draft Scoping Report
DWA	Department of Water Affairs
DWHM	De Wildt Helpmekaar Maatskaapy
EA	Environmental Authorisation
EIA	Environmental Impact Assessment
GDARD	Gauteng Department of Agriculture and Rural Development
EMP	Environmental Management Programme
IWMP	Integrated Waste Management Plan
I&AP	Interested and Affected Parties
JSE	Johannesburg Stock Exchange
MRF	Material Recovery Facility
NEM: WA	National Environmental Management: Waste Act
PP	Public Participation
PPE	Personal Protective Equipment
SADC	Southern African Development Community
SR	Scoping Report
TWG	The Waste Group
WIS	Waste Information System

3 GENERAL

Issue/Concern	Issue raised by	Means of communication	Date	Response
<i>At the Onderstepoort landfill management problems were noticed e.g. spreading plastics which cattle can eat and papers all over the area and migrant workers sifting through the waste for whatever they can get and living on the site. As well as birds being attracted to the dump site.</i>	Mr R W Kroon Kroon Gourmet Chickens	Letter	27 February 2014	Interwaste will manage the proposed Multisand landfill facility strictly according to the Department of Water Affairs (DWA) Minimum Requirements for Waste Disposal by Landfill (2 nd Edition, 1998). These management requirements and actions will amongst others address issues like wind-blown litter. Also, no migrant workers / scavengers will be allowed on site, as strict access control will be implemented.
Kroon Chickens request electronic copies on CD of the management plan	Mr RW Kroon Kroon Gourmet Chickens	Letter	27 February 2014	The Environmental Management Plan (EMP) will be appended to the EIA report, during the EIA phase of the EIA study.
As the proposed landfill site boundaries are not correct, an updated map was requested.	Mr RW Kroon Kroon Gourmet Chickens	Letter	27 February 2014	An updated map indicating the proposed project area has been included in the Final Scoping Report.
<i>We acknowledge that it is a challenge to obtain accurate information on remaining life for some sites but feel that Interwaste should have accurate figures for their own FG site and others that they manage. To our knowledge and as per Interwaste literature, the site has not even started developing their third and fourth phase and therefore the stated 2 years remaining life is misleading.</i>	Mr N Brink EnviroServ	E-mail	25 April 2014	The remaining airspace, and subsequently the remaining life of any landfill is determined by the average monthly waste disposal rate, which varies depending on the need for waste disposal capacity in any particular region. With most of the municipal landfills having reached its maximum design capacity, the waste stream to be disposed of on legally compliant waste disposal facilities could at any time increase, should municipal landfills be required to shut down when its design life was reached. Even if the FG landfill has a remaining life of 11 years, it will not be able to accommodate all waste from municipal landfills that are due to close in Gauteng over the next decade.
<i>The statement that no new disposal facilities are currently being developed is wrong as Waste Group is busy with a large expansion project in Pretoria.</i>	Mr N Brink EnviroServ	E-mail	25 April 2014	Comment noted. To the best of our knowledge the "large expansion project" does not include development of a new waste disposal facility.
<i>The church has a television station Rabboni TV which is a free to air satellite channel with its studios located at the property. Further, the church intends to setup satellite dishes on the property and construct other buildings to expand the station.</i>	Mr B Mogalane Rabboni Centre Ministries	Letter	10 April 2014	Comment noted. It is not anticipated that the proposed landfill site will impact on the existing or future air satellite channels, dishes or buildings.
<i>The church currently utilises the services of several guesthouses and hotels around Ga -Rankuwa and Pretoria to accommodate its guests from SADC countries and others from within the South Africa. On church service days, the church shuttles its guests from these places of accommodation to the hall at the University. It is against this background that the church has decided to build several chalets to accommodate guests on the property and later build a hotel for this purpose.</i>	Mr B Mogalane Rabboni Centre Ministries	Letter	10 April 2014	Comment noted. Specialist studies to be conducted during the EIA phase of the EIA study will investigate possible impacts on neighbouring properties. The air quality study specifically will investigate and determine safe buffer areas to be maintained around the proposed landfill site. In addition to environmentally sound landfill operations, these buffer areas will further mitigate potential impacts associated with the proposed landfill facility.

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Issue/Concern	Issue raised by	Means of communication	Date	Response
<i>The church therefore does not envisage having a dumping in its vicinity.</i>				
<i>The church therefore expresses that a dumping site catering for the whole of Gauteng and potential neighbouring provinces will affect it negatively and hereby objects to the establishment of such a facility or the granting of a license to the applicants. Alternative sites may be explored by the applicants as required by law.</i>	Mr B Mogalane Rabboni Centre Ministries	Letter	10 April 2014	Comment noted. Landfills in Metropolitan areas are mostly developed as regional facilities, serving more than one community. Through this process, the economies of scale achieved make it feasible for such landfills to be developed and operated to the required environmental standards. A desktop site selection study has been conducted, which resulted in the proposed Multisand landfill site being identified as the preferred site.
<i>What is the role that the municipality will play on this proposed Multisand Landfill?</i>	Mrs M Mohlaba City of Tshwane	Focus Group Meeting	11 March 2014	Although CoT may become a user of the proposed Multisand landfill, CoT will not be involved in the landfill operations, other than being part of the regulating authorities.
<i>Why did Interwaste choose the Project Site as the preferred site after the site selection process?</i>	Mr L Makhubela City of Tshwane	Focus Group Meeting	11 March 2014	The criteria for site selection <i>inter alia</i> included the existing land use (the site being a quarry); the potential life span of about 80-100 years; the geological conditions of the proposed site that allows for development of the landfill site. The location of the proposed landfill is such that it will <i>inter alia</i> serve the northern areas of Tshwane, as well as expanding areas to the north and west of Tshwane.
<i>When will the operations commence at the proposed Multisand Landfill?</i>	Ms S Bhailall City of Tshwane	Focus Group Meeting	11 March 2014	Should the proposed Project be authorised, development could be anticipated to commence in 2017.
<i>Why did Interwaste choose the Northern side of Tshwane when they could have chosen the Southern side where there is a need for the landfill and space for it? The proposed Multisand is close to the Onderstepoort Landfill which still has ample capacity for the next few years.</i>	Ms S Bhailall City of Tshwane	Focus Group Meeting	11 March 2014	The needs study indicated that the existing landfills within the northern parts of Tshwane have limited air space available, with the Rosslyn privately owned landfill that recently closed. Also, given the expansion of the northern parts of Tshwane, the need for a landfill facility to cater for these areas was identified.
<i>Has it already been decided that the landfill will be constructed?</i>	Mr J Kroon Kroon Gourmet Chickens	Focus Group Meeting	12 March 2014	No, it has not yet been decided that the landfill will be constructed. AECOM is currently in the beginning of the EIA process, which is to be conducted as part of the landfill licensing process. The results from the EIA process are considered when the regulating authorities decide as to whether a landfill license is to be issued. The landfill cannot be developed should authorisation not be obtained from the GDARD and DEA.
<i>Before the Rabboni Centre Ministries decided to develop their property, they conducted a study and there was at the time no indication of a landfill site within the area. The plan is for the church to build a large number of residential facilities on the premises together with a church, larger than the one currently being constructed, to accommodate about 10 000 people. The</i>	Mr S Mokhwesana	Focus Group Meeting	12 March 2014	Comment noted. Specialist studies to be conducted during the EIA phase of the EIA study will investigate possible impacts on neighbouring properties. The air quality study specifically will investigate and determine safe buffer areas to be maintained around the proposed landfill site. In addition to environmentally sound landfill operations, these buffer areas will further mitigate potential impacts associated with

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Issue/Concern	Issue raised by	Means of communication	Date	Response
church does not want a landfill next to their property.				the proposed landfill facility.
<i>What are the criteria used to identify the Multisand property as the preferred site when compared with the other 14 sites reportedly listed in the site selection report?</i>	Mr B Mogalane Rabboni Centre Ministries	Focus Group Meeting	12 March 2014	Criteria for consideration inter alia included the location, potential fatal flaws, existing land use and the geology of the area. Please refer to the site selection report appended to the scoping report.
<i>For how long has Interwaste been in operation?</i>	Mr B Mogalane Rabboni Centre Ministries	Focus Group Meeting	12 March 2014	Interwaste has been in operation for more than 20 yrs. They merged with Enviro-Fill (specialists in landfill operations) during that period.
<i>What is the life span of the proposed Multisand Landfill site?</i>	Mr B Mogalane Rabboni Centre Ministries	Focus Group Meeting	12 March 2014	Depending on the waste disposal rate, the landfill is expected to have a life of approximately 80-100 years.
<i>Will Interwaste subcontract to municipalities.</i>	DWHM	Focus Group Meeting	12 March 2014	Interwaste may subcontract waste removal to the landfill site to municipalities. However, all subcontractors to Interwaste will have to adhere to Interwaste's policies, rules and regulations. Since Interwaste is a private and JSE listed company, they will strictly adhere to the Minimum Requirements for Waste Disposal by Landfill when operating a landfill.
<i>How will informal reclaimers and recyclers be managed / controlled on site?</i>	DWHM	Focus Group Meeting	12 March 2014	Interwaste does not allow for onsite waste reclaimers or recyclers, due to the health and safety risks associated with that. Recycling is best done at source, and discussions regarding recycling facilities will be held with the Tshwane municipality.
<i>Since there are numerous quarries adjacent to the Multisand property, will Interwaste consider expanding to neighbouring quarries in future?</i>	DWHM	Focus Group Meeting	12 March 2014	Interwaste does not intend to use neighbouring quarries in future, as the proposed Multisand landfill will be a large regional landfill with capacity expected to serve Interwaste's needs for more than 80 years.
<i>Will the existing quarry still operate should the proposed landfill be developed?</i>	DWHM	Focus Group Meeting	12 March 2014	The mining will continue to take place after the landfill was developed for the following reasons: <ul style="list-style-type: none"> • Not to sterilise potential mineral resources. • Not to result in unnecessary job losses. • To optimise development cost for the proposed landfill by creating more waste disposal capacity per m² landfill liner installed.
All activities on site should comply with Tshwane Municipality's by-laws.	Mr L Siphuma City of Tshwane	Letter	15 April 2014	All activities on site 'will comply with Tshwane Municipality's by-laws.
<i>Is Interwaste ISO14001 certified?</i>	DWHM	Focus Group Meeting	12 March 2014	Interwaste is ISO14001 certified. DWHM can visit the Interwaste website for more information on its current operations.

4 EIA ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
<i>The executive summary does not make mention of any type of hazardous waste yet the Table 2-3 mentions types 2, 3 and 4 waste (general and hazardous).</i>	Mr D van Niekerk The Waste Group	Letter	30 April 2014	Comment noted. The Executive Summary is however intended to be a summary, and therefore does not repeat all the detailed information presented in the overall Draft Scoping Report (DSR). The requirement is for I&APs to review the overall DSR. It is important that I&AP's obtain a comprehensive overview of the project, allowing them to make an informed and meaningful contribution towards the EIA process in an objective manner.
<i>In Section 5.1.10.2 - Why don't the report say between 5 - 40m as in the Section 5.1.10.1, as opposed to as deep as 40m below surface, this paints a pretty picture and does not reflect the potential reality?</i>	Mr J Schoeman Primeco Meat	Letter	30 April 2014	Since geohydrological investigations are only due to be undertaken as part of the EIA process, information presented in the Draft Scoping Report is based on available literature. Barnard (2000) indicated, as stated in the DSR, that groundwater levels can vary between 5 and 40m below ground surface in the Rustenburg Layered Suite of the Bushveld Complex. It is further indicated in the DSR that the depth to the <u>static</u> groundwater level varies for different geological conditions and <u>can be expected</u> to be as deep as 40m below surface.
The proposed site is motivated by highlighting the need for additional waste disposal capacity in Gauteng. It is not clear however why the available landfill capacity in Johannesburg is used to motivate for the establishment of a site 24 km northwest of Pretoria. Surely if there is a need for sites to service Johannesburg, closer options would make sense particularly given the fact that the report flags transport cost as a concern. The heading of 2.1.4 is "The Need and Desirability for a Regional Landfill to Service the Northern Part of Gauteng." If this is the need that had been identified, it is unclear why the picture is being clouded with Johannesburg issues and Ekurhuleni which has more airspace than they need in the medium term.	Mr N Brink EnviroServ	E-mail	25 April 2014	Interwaste fully agrees with the statement that waste should from an economic point of view be disposed of as close as possible to the source. The reality is however that the shortage of landfill airspace (capacity) in one Metropolitan Municipality is resulting in waste being diverted to neighbouring municipalities. Waste from Johannesburg has for instance for quite some time being disposed of in Ekurhuleni (e.g. at the Chloorkop landfill). The viable transport distance is a function of airspace supply and demand; the less airspace on landfills available in one municipality, the more viable it will become to transport waste over longer distances for disposal in neighbouring municipalities.
Under project alternatives, it appears that mining operations will continue on site whilst the site is being run as a disposal / treatment facility. This is of concern particularly as hazardous waste would be accepted resulting in exposure to people other than disposal site staff. These people should be inducted, kitted with appropriate PPE, subjected to medical surveillance etc. as is required for staff working on a hazardous waste site.	Mr N Brink EnviroServ	E-mail	25 April 2014	Although the mining and waste disposal is undertaken on the same property, the current landfill study area is in the order of 275 ha. This is providing sufficient space for the mining and waste disposal operations to be separated sufficiently to ensure that workers from the one operation will not be put at risk by the other operation. It is also confirmed that the (i) mining and (ii) waste disposal operations will <i>inter alia</i> comply with the Mine Health and Safety Act (Act 29 of 1996) and the Occupational Health and Safety Act (Act 85 of 1993), respectively.

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Issue/Concern	Issue raised by	Means of communication	Date	Response
We acknowledge that it is a challenge to obtain accurate information on remaining life for some sites but feel that Interwaste should have accurate figures for their own FG site and others that they manage. To our knowledge and as per Interwaste literature, the site has not even started developing their third and fourth phase and therefore the stated 2 years remaining life is misleading.	Mr N Brink EnviroServ	E-mail	25 April 2014	The remaining airspace, and subsequently the remaining life of any landfill is determined by the average monthly waste disposal rate, which varies depending on the need for waste disposal capacity in any particular region. With most of the municipal landfills having reached its maximum design capacity, the waste stream to be disposed of on legally compliant waste disposal facilities could at any time increase, should municipal landfills be required to shut down when its design life was reached. Even if the FG landfill has a remaining life of 11 years, it will not be able to accommodate all waste from municipal landfills that are due to close in Gauteng over the next decade.
The scoping report is ambiguous in the following manner: It refers to a regional facility for Gauteng, yet only takes the City of Tshwane's disposal needs into consideration. Only figures and situation for City of Tshwane quoted whilst this is a "regional" facility, the picture is not a true reflection of the true intend of the site.	Mr D van Niekerk The Waste Group	Letter	30 April 2014	Similar to other commercial regional landfills, the Multisand landfill will not be developed for the exclusive use by any particular municipality; or for private waste generators from a single municipal area. It is expected that The Waste Group (TWG), should, as the owner of regional landfills, understand that commercial regional landfills are developed to receive waste from various generators within the expected catchment area. TWG's Mooiplaats landfill that is located in Tshwane, but receiving waste from Johannesburg, is a typical example of this.
The scoping report is ambiguous in the following manner: <i>It does not refer to any handling, treatment or disposal of hazardous waste in the executive summary, yet in Table 3-1 a number of such activities are listed as well as in Table 2-3, types 2, 3 and 4 waste (general and hazardous) are mentioned. The report should in the executive summary clearly indicate that the intent is to handle, treat and dispose hazardous waste.</i>	Mr D van Niekerk The Waste Group	Letter	30 April 2014	Comment noted. The Executive Summary is however intended to be a summary, and therefore does not repeat all the detailed information presented in the overall Draft Scoping Report (DSR). The requirement is for I&APs to review the overall DSR. It is important that I&AP's obtain a comprehensive overview of the project, allowing them to make an informed and meaningful contribution towards the EIA process in an objective manner.

5 VECTORS AND SPREAD OF DISEASES

Issue/Concern	Issue raised by	Means of communication	Date	Response
<i>The proposed site will attract wild migrating birds to the area which are the carriers of various diseases like New Castle, Avian influenza and bird flu strains, This will put the broiler industry at higher risk over which we have no control.</i>	Mr RW Kroon Kroon Gourmet Chickens	Letter	27 February 2014	Your concern is noted. The risk of spreading of diseases by wild migrating birds attracted to the proposed landfill will be investigated during the EIA phase of this environmental impact assessment. These investigations will aim to determine the extent of the risk and identify potential mitigation measures to the attraction of wild birds to the

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<p><i>The farm was established in 1986 after thorough investigation as the location is of utter importance due to spreading of diseases.</i></p> <p><i>Kroon Chickens currently work on an all-in, all-out slaughter system to reduce risk of diseases spreading this will seriously be compromised by the proposed landfill facility.</i></p>				landfill and / or chicken farm, or to limit the spread of diseases.
<p><i>Kroon Chickens had a look at the present landfill site at Rosslyn, near Onderstepoort and noticed a lot of management problems like spreading plastics which cattle can eat and papers all over the area and migrant workers sifting through the waste for whatever they can get and living on the site. As well as birds being attracted to the dump site.</i></p>	Mr RW Kroon Kroon Gourmet Chickens	Letter	27 February 2014	Interwaste will manage the proposed Multisand landfill facility strictly according to the DWA Minimum Requirements for Waste Disposal by Landfill (2nd Edition, 1998). These management requirements and actions will amongst others address issues like wind-blown litter. Also, no migrant workers / scavengers will be allowed on site, as strict access control will be implemented.
<p>The disposal of organic material at the proposed landfill may furthermore increase the risk of diseases at the Kroon Gourmet Chicken abattoir.</p>	Mr J Kroon Kroon Gourmet Chickens	Focus Group Meeting	12 March 2014	Comment noted. This matter will be investigated during the EIA process. A comprehensive air quality study is amongst others one of the investigations due to be undertaken as part of the EIA.
<p><i>How will vectors (e.g. flies) and rodents (e.g. rats) be managed at the landfill.</i></p>	Mr J Kroon Kroon Gourmet Chickens	Focus Group Meeting	12 March 2014	Interwaste is a private company listed on the JSE. Therefore they would need to manage and operate the proposed landfill strictly according to DWA's Minimum Requirements for Waste Disposal by Landfill. This will amongst others include the daily compaction and covering of waste, which in turn greatly reduces a habitat and food for vectors and rodents.
	DWHM	Focus Group Meeting	12 March 2014	
<p><i>How will Interwaste manage the breeding of flies at the landfill. Based on previous experience, landfill sites are not managed properly thus resulting in nuisances and pollution e.g. the Onderstepoort landfill.</i></p>	Mr S Mokhwesana Rabboni Centre Ministries	Focus Group Meeting	12 March 2014	Interwaste is a private company listed on the JSE. Therefore they would need to manage and operate the proposed landfill strictly according to DWA's Minimum Requirements for Waste Disposal by Landfill. This will amongst others include the daily compaction and covering of waste, which in turn greatly reduces a habitat and food for vectors and rodents.
<p><i>The proposed Multisand landfill may potentially lead to our business being closed. This is mainly due to the risk of spreading of avi-faunal diseases due to birds being attracted to the landfill site. Of concern currently is the Sacred Ibis that is already present on the chicken farm.</i></p>	Mrs P Kroon Kroon Gourmet Chickens	Focus Group Meeting	12 March 2014	<p>The concern regarding migrating birds attracted to the landfill is noted and will be investigated during the EIA process.</p> <p>These investigations will aim to determine the extent of the risk and provide identify potential and identify potential mitigation measures to the attraction of wild birds to the landfill and / or chicken farm, or to limit the spread of diseases.</p>
<p>The crocodile farm, approximately 3 km from Kroon's property already attracts birds through leftovers from chickens that died of disease being fed to the crocodiles. With the birds then attracted to the chicken farm, it increases the risk for spreading of diseases.</p>	Mrs P Kroon Kroon Gourmet Chickens	Focus Group Meeting	12 March 2014	

6 PUBLIC PARTICIPATION PROCESS AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
EnviroServ understand that as registered I&AP we will continue to receive copies of correspondence and notices relating to this project and that the public would be afforded a further opportunity to comment on the final scoping report once finalised.	Mr N Brink EnviroServ	E-mail	25 April 2014	AECOM confirm that as a registered I&AP, you will continue to receive copies of correspondence and notices relating to this project. Opportunities for the public to comment on documentation circulated as part of the EIA process will be in compliance with the relevant legislation.
As a landfill owner with sites mentioned in the report as well as being a waste operator within the City of Tshwane, one would have thought that TWG would be part of the stakeholder database from the outset?	Mr D van Niekerk The Waste Group	Letter	30 April 2014	The EIA process is followed strictly in conformance to the NEMA: EIA Regulations of 2010. In addition to advertisements placed in both local and regional newspapers, neighbouring landowners were personally contacted to inform them about the proposed Multisand landfill development. There is also a corresponding responsibility on stakeholder to participate when they believe they may be affected. However, AECOM confirms that TWP is registered as an I&AP, and will continue to receive copies of correspondence and notices relating to this project.
The DSR should be placed at the City of Tshwane (CoT) Akasia Office during the public review period to make it easily accessible for the Akasia community.	Cllr Morudu CoT	Focus Group Meeting	12 March 2014	A copy of the DSR was placed at the City of Tshwane (CoT) Akasia Office.
DWHM requested to meet with the EIA project team three more times during the course of the EIA.	DWHM	Focus Group Meeting	12 March 2014	After the Focus Group meeting held with representatives from the DWHM on 12 March, a public open day / public meeting took place on 12 April 2014. This open day / public meeting was attended by members of the DWHM as well as IAP's not affiliated with the DWHM. Another open day and focus group meeting will be held during the EIA phase.
As it will be a regional landfill, and cater for waste generated across provinces, an objection was lodged by DWHM as the project is to be advertised in the government Gazette as well, in addition to a regional and local.	DWHM	Focus Group Meeting	12 March 2014	According to the Department of Environmental Affairs' Integrated Environmental Management Guideline Series 7, regarding public participation in the EIA process, a project with potential impacts across municipal boundaries needs to be advertised in any official Gazette published specifically for the purpose of providing public notices of application in terms of the NEMA:EIA Regulations. However, with no Gazette specifically concerned with publications in respect of the NEMA EIA Regulations in place, such an advertisement needs to be placed in a local and regional newspaper. As such, the proposed project was announced through an advertisement in the Beeld and Brits Pos Newspaper.

7 ENVIRONMENTAL IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
What is the way forward after the Environmental Impact Assessment (EIA) Process?	Mr N Thobejane CoT	Focus Group Meeting	12 March 2014	Should the Environmental Authorisation (EA) be obtained, it will take approximately 2 years for the project to commence.
A detailed layout plan, overlaying all sensitivities shall be included in the EIA report and submitted to CoT for perusal. It is recommended that a composite sensitivity plan be overlaid on the site plan to direct the layout of the proposed development. The layout plan shall also be made available for the surrounding I&APs to evaluate and comment on.	Mr L Siphuma CoT	Letter	15 April 2014	A sensitivity map will be compiled as part of the specialist studies to be conducted during the EIA phase of the EIA study. Such a map will be included in the draft and final EIA reports.
All specialist studies must be conducted and included in the EIA report. The assessment must include all potential impacts of the proposed development and appropriate mitigation measures.	Mr L Siphuma CoT	Letter	15 April 2014	All specialist studies conducted will be appended to the draft EIA report, which will be made available for public review / comments. These specialist assessments will include the potential impacts assessed as well as proposed mitigation measures.
An EMP must be included in the EIA report. The EMP should identify all activities that may have an adverse impact on the environment or the potential to cause an environmental harm, and detail the mechanisms employed to prevent or minimise the impact of these activities. If require, the ways in which the conduct of the activity will enable altered minimise or reduce the adverse environment impact of the activity is detailed including a time table for implementation.	Mr L Siphuma CoT	Letter	15 April 2014	The draft EMP will be appended to the draft EIA report, which will be made available for public review. The EMP will identify all activities that may have an adverse impact on the environment or the potential to cause an environmental harm, and detail the mechanisms employed to prevent or minimise the impact of these activities.

8 WATER QUALITY MANAGEMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
For the chicken farm, the water supply is critical as the normal amount of water needed is 15lts per bird slaughtered. The quality of the water is of paramount importance to produce a safe and edible product.	Mr R W Kroon Kroon Gourmet Chickens	Letter	27 February 2014	Comment noted. The proposed landfill will be equipped with a Class B liner that will prevent groundwater pollution. Specialist studies will address the potential impact of the proposed project on water resources. This assessment will be contained in the draft EIA report, which together with the specialist studies, will be made available for public review / comments. The EIA report will furthermore indicate possible mitigation measures, or indicate how the impacts may be avoided.

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Issue/Concern	Issue raised by	Means of communication	Date	Response
What mitigation measures would be in place regarding Water Pollution?	Mr Lemmer De Wildt Resident	Letter	12 April 2014	The proposed landfill will be equipped with a Class B liner that will prevent groundwater pollution. Specialist studies will address the potential impact of the proposed project on water resources. This assessment with potential mitigation measures will be contained in the draft EIA report, which together with the specialist studies, will be made available for public review / comments.
<i>Would you provide us with a water car like in the informal settlements or claim it to be a nature disaster and not the responsibility of the proposed project?</i>	Mr Lemmer De Wildt Resident	Letter	12 April 2014	The proposed Multisand landfill will be developed and operated in accordance with the legislated norms and standards set to prevent water pollution. Such norms and standards were formulated based on many years of experience and extensive international research. It is therefore not envisaged that surface and / or ground water will be polluted as a result of the landfill development and operations, which in turn will avoid the need for water cars to be used to supply water to De Wildt residents. The risk of potential environmental disasters is taken into consideration during the design and construction of landfills.
<i>Would the proposed project supply the area with a water pipeline from Randwater and then expect the people to pay for the pipeline and the connection to the line?</i>	Mr Lemmer De Wildt Resident	Letter	12 April 2014	The proposed Multisand landfill will be developed and operated in accordance with the legislated norms and standards set to prevent water pollution. Such norms and standards were formulated based on many years of experience and extensive international research. It is therefore not envisaged that surface and / or ground water will be polluted as a result of the landfill development and operations, which in turn will avoid the need for water to be supplied by Randwater.
<i>Before any property can be sold proof of water quantity and quality must be provided upfront. These are plots and farms and depend on underground water no water supply from the municipality.</i>	Mr Lemmer De Wildt Resident	Letter	12 April 2014	The proposed Multisand landfill will be developed and operated in accordance with the legislated norms and standards set to prevent water pollution. Such norms and standards were formulated based on many years of experience and extensive international research. It is therefore not envisaged that the quantity or quality of ground water will be affected.
The church objects on the following reason: <i>The church currently has a borehole on its property and depends on it for its water needs. Currently, 20 members of staff live on the farm and daily use water from this borehole for drinking, cooking and ablution purposes. The church also is extending these staff quarters for its personnel to accommodate more people. The church intends to establish a second borehole to cater for its water needs.</i>	Mr B Mogalane Rabboni Centre Ministries	Letter	10 April 2014	Comment noted. The proposed landfill will be equipped with a Class B liner that will prevent groundwater pollution. Specialist studies will address the potential impact of the proposed project on water resources. This assessment will be presented in the draft EIA report, which together with the specialist studies, will be made available for public review / comments.

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Issue/Concern	Issue raised by	Means of communication	Date	Response
A site specific Storm Water Management Plan should be implemented. The plan should be designed to adequately control the volume, speed and location of runoff, to avoid soil erosion and to prevent contaminated water from leaving the landfill site and entering the natural environment in an uncontrolled manner.	Mr L Siphuma CoT	Letter	15 April 2014	Comment noted. A stormwater management plan will be compiled. This plan will be contained in the draft EIA report, which together with the specialist studies, will be made available for public review / comments.
Enquired as to whether the water supply for the project area is via municipal infrastructure or groundwater.	Mr L Makhubela CoT	Focus Group Meeting	11 March 2014	In the project area, water is sourced from boreholes (groundwater).
Which office from DWA will be involved in the project?	Mr L Makhubela CoT	Focus Group Meeting	11 March 2014	It will be the DWA Gauteng Regional Office, located in Pretoria.
Is Multisand currently doing groundwater monitoring on site?	Mr L Makhubela CoT	Focus Group Meeting	11 March 2014	Multisand is undertaking ground water monitoring in compliance with its mining authorisation.
Kroon Chickens obtain their water from boreholes that may be polluted by the proposed landfill.	Mr J Kroon Kroon Gourmet Chickens	Focus Group Meeting	12 March 2014	The proposed landfill will be equipped with a Class B liner that will prevent groundwater pollution. Specialist studies will address the potential impact of the proposed project on water resources. This assessment will be presented in the draft EIA report, which together with the specialist studies, will be made available for public review / comments.
The area is supplied with water from a few selected boreholes within the area. If the proposed landfill impact negatively on groundwater, it may affect the entire community.	DWHM	Focus Group Meeting	12 March 2014	
<i>The report indicated that there are no natural watercourses within the project area. The wetlands occurring downstream down of the settling dams were formed as the results of the settling dam and not due to natural causes.</i>	Mr L Siphuma City of Tshwane	Letter	15 April 2014	During the EIA, an aquatic assessment will be conducted to investigate the presence of natural watercourses within the project area. This study will address the potential impact of the proposed project on water resources, as well as the location of natural water resources within the area. This assessment will be contained in the draft EIA report, which together with the specialist studies, will be made available for public review / comment.

9 TRAFFIC IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
Multisand (Pty) Ltd is violating Rabboni Centre Ministries rights in using the existing road over its property.	Mr B Mogalane Rabboni Centre Ministries	Letter	10 March 2014	Thank you for this information. The implications related to the landfill development will be considered during the traffic impact study forming part of the EIA.
<i>Multisand is illegally using a portion of the property, as a</i>	Mr B Mogalane	Letter	10 April 2014	

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Issue/Concern	Issue raised by	Means of communication	Date	Response
<i>through fare, as a result of a personal servitude granted by previous owners of portion 17 Uitvalgrond, Lapsed upon the sale of the property to the church. There is currently a dispute between Rabboni Centre Ministries, Multisand and other parties and the matter is pending before the Gauteng High Court case no. 6700/10.</i>	Rabboni Centre Ministries			
The existing southern access road to the landfill site is not adequate for a landfill site.	Mr C Kroon Kroon Gourmet Chickens	Focus Group Meeting	12 March 2014	Comment noted. A traffic impact study will be conducted as part of the EIA process. This study will investigate different options for access to the proposed landfill and will investigate whether certain access routes are to be upgraded.
<i>What is the road access route proposed for the waste trucks?</i>	Mr S B Mosuoie Rabboni Centre Ministries	Focus Group Meeting	12 March 2014	Access to the landfill side will be via the southern side, with possibility of access via the northern side being investigated for future use, mainly because majority of the waste may be coming from the northern side. A traffic impact assessment will be conducted as part of the EIA to determine the viability of this proposed access route.
A concern was raised in terms of the potential traffic impacts and traffic safety risks due to the increase in trucks transporting waste to the proposed landfill. In addition, the areas where the waste will be generated needs to be considered in line with the proposed access route.	DWHM	Focus Group Meeting	12 March 2014	A traffic impact study will be conducted as part of the EIA. Two access routes are proposed, possible from the north and south. The viability thereof will be assessed as part of the traffic impact study.
Will the proposed access road be tarred?	DWHM	Focus Group Meeting	12 March 2014	The traffic impact study will determine the level to which the site access road will need to be upgraded. However, if it is not tarred, dust suppression measures will definitely be applied on any gravel roads used for site access.
<i>Rabboni Centre Ministries do not take kindly to the fact that they intend to establish such a repulsive facility on its door step. In that regard client reserves its rights to litigate if needs be.</i>	Mr B Mogalane Rabboni Centre Ministries	Letter	10 March 2014	The viewpoint is noted. The primary objective of the Environmental Impact Assessment is to determine the potential impact of the proposed landfill on the environment, which includes neighbouring communities. Appropriate preventative measures are then proposed, aimed at mitigating the potential impacts.

10 VISUAL IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
The visual characteristics of what the proposed site will look like should be indicated during the EIA process	DWHM	Focus Group Meeting	12 March 2014	Comment noted. A visual assessment will be conducted. This study will indicate what the operational site will look like, as well as what the landfill will look like subsequent to closure and rehabilitation

11 AIR QUALITY IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
The air pollution emanating from the proposed dumping site facility, resulting from the various motor vehicles operated by the applicant and its clients will be an unwelcome and undesirable intrusion on the peaceful possession, use and enjoyment of the property's owners and members of the church.	Mr B Mogalane Rabboni Centre Ministries	Letter	10 March 2014	An air quality impact assessment will be conducted to assess the potential risk of air pollution resulting from the proposed landfill project. The findings of these studies will be incorporated into the draft EIA report, which, together with the specialist reports, will be made available for public review / comments.

12 NOISE IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
The noise emanating from the proposed dumping site facility, resulting from the various motor vehicles operated by the applicant and its clients will be an unwelcome and undesirable intrusion on the peaceful possession, use and enjoyment of the property's owners and members of the church.	Mr B Mogalane Rabboni Centre Ministries	Letter	10 March 2014	A noise impact assessment will be conducted to assess the potential noise impacts of the proposed project. The findings of these studies will be incorporated into the draft EIA report, which, together with the specialist reports, will be made available for public review / comments.
The church submits that the high volume traffic of trucks and other motor vehicles will create noise pollution, which will disturb the tranquil setting for the church, its members on daily meditation and reflective devotion praying on the prayer mountain and the surrounding tree areas on our property.	Mr B Mogalane Rabboni Centre Ministries	Letter	10 March 2014	A traffic impact assessment as well as a noise impact assessment will be conducted to assess the potential traffic and noise impacts of the proposed project. The findings and recommendations of these studies will be incorporated into the draft EIA report, which, together with the specialist reports, will be made available for public review / comments.

13 BIODIVERSITY ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
Kroon's is currently processing 60 000 birds a day providing protein to the nation — the cleanliness of the surroundings can account for a clean and healthy product.	Mr R W Kroon Kroon Gourmet Chickens	Letter	27 February 2014	Comment noted. Specialist studies will be conducted as part of the EIA process. These studies will investigate and assess the possible impacts on the surrounding environment together with potential mitigating measures to address such impacts, and will be appended to the draft EIA report, which will be made available for public review / comments.
The EIA team needs to investigate the following: <ul style="list-style-type: none"> • Buffer area of the biosphere reserve • Bullfrogs that may occur in the area • Occurrence of grass owls • Conservation status of the koppies within the project area • Presence of wetlands 	DWHM	Focus Group Meeting	12 March 2014	All of the listed aspects will be investigated during specialist studies undertaken as part of the EIA investigations and the findings from the investigations will be appended to the draft EIA report, which will be made available for public review / comments.
<i>The church's plans include stocking the property with small mammals like bucks, zebras etc. and the ecological impact of a dumping site on the border of the property; will have dire negative consequences. Even if the applicants may employ measures to counter accidents / incidents like wind blowing litter around or floods carrying waste off site, the potential occurrence of such will impact the ecology negatively.</i>	Mr B Mogalane Rabboni Centre Ministries	Letter	10 March 2014	An ecological assessment will be conducted to assess the potential impacts of the proposed landfill on the surrounding ecology. Interwaste is a private company listed on the JSE. Therefore they would need to manage and operate the proposed landfill strictly according to DWA's Minimum Requirements for Waste Disposal by Landfill. This will include the daily compaction and covering of waste, which in turn greatly reduces wind-blown litter. Where required, litter catch nets can also be used to prevent waste from being blown off the landfill.
According to the Tshwane open space framework the following open space typologies influence and/or in close proximity of the proposed development: <i>A Blue Way namely Medelwater Spruit and its tributaries. Blue Ways are essential in the provisioning of environmental of goods services, protection of biodiversity endangered species and ecological system, as well as eco-based activity. The value of Blue way lies in their ability to maintain natural hydrological and ecological cycle, such as conserving valuable aquatic system, purifying water, recharging water tables and protecting the flooding. They also provide in the drinking and irrigation of water needs of the city. Blues Ways have a secondary socio-economic and place-making function. Therefore Blues Ways must be conserved.</i>	Mr L Siphuma CoT	Letter	15 April 2014	The proposed impact on the mentioned Blue Way will be investigated during the EIA process. Although there are currently no know river systems of tributaries within the project area an ecological assessment and water resources assessment will investigate possible impacts the project may have on the ecology and water resources within the area. Furthermore, a socio-economic assessment will be conducted to investigate and assess the possible direct and in-direct socio-economic impacts the project may have. The findings of these specialist studies will be contained in the draft EIA report, which will also detail the recommendations and mitigation measures to prevent or minimise possible impacts.

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Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>According to the Tshwane Open Space Framework the following open space typologies influence and/or in close proximity of the proposed development:</p> <p><i>A Blue Node namely Meledwater Spruit and its tributaries. Blue Node are essential in the provisioning of environmental goods and services, the protection of biodiversity endangered species and ecological system as well as eco-based activity. The value of Blue Nodes furthermore lies in their ability to maintain natural hydrological and ecological cycle such as conserving valuable aquatic system, purifying water, recharging water tables, preventing flooding and providing drinking and irrigation of water. Blue Nodes have a secondary socio-economic and place-making function. Therefore Blue Nodes must be conserved.</i></p>	Mr L Siphuma CoT	Letter	15 April 2014	The proposed impact on the mentioned Blue Node will be investigated during the EIA process. Although there are currently no know river systems of tributaries within the project area an ecological assessment and water resources assessment will investigate possible impacts the project may have on the ecology and water resources within the area. Furthermore, a socio-economic assessment will be conducted to investigate and assess the possible direct and in-direct socio-economic impacts the project may have. The findings of these specialist studies will be contained in the draft EIA report, which will also detail the recommendations and mitigation measures to prevent or minimise possible impacts.
<p>According to the Tshwane Open Space Framework the following open space typologies influence and/or in close proximity of the proposed development:</p> <p><i>A Green Way namely Schietfontein Hills. Green Way are essential in the provisioning of environmental goods and services the protection of biodiversity, endangered species and ecological system, as well as eco-based activity. Class 1 and 2 Ridges are predominantly ecologically pristine and must be conserved. Class 3 and 4 Ridges have been predominantly transformed by human intervention but remain valuable and need to be retained rehabilitated where possible as ecological and spatial linkages.</i></p>	Mr L Siphuma CoT	Letter	15 April 2014	It is not anticipated that the proposed project will impact on existing ridges within the project area. However, an ecological assessment will be conducted during the EIA study to investigate the status of possible ridges within the project area. The findings of this specialist study will be contained in the draft EIA report, which will also detail the recommendations and mitigation measures to prevent or minimise possible impacts.
<p>According to the Tshwane Open Space Framework the following open space typologies influence and/or in close proximity of the proposed development:</p> <p><i>A Grey Node namely Quarries in Ga-Rankuwa South Hills. The value of Grey Ways lies in their socio-economic functioning: the rendering of and support to primary service delivery, as well as their potential to supplement ecological (as linkages) and recreational functioning (once close and redevelop).</i></p>	Mr L Siphuma CoT	Letter	15 April 2014	Comment noted. An ecological and socio-economic assessment will be conducted during the course of the EIA study. The findings of these studies will be incorporated into the EIA report, which will be available for public review / comments.

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Issue/Concern	Issue raised by	Means of communication	Date	Response
<p>According to the Bioregional Plan for the Gauteng Metropolitan Municipalities the proposed site is situated within and adjacent to the following areas:</p> <p><i>Critical Biodiversity Area 1: Any terrestrial or aquatic area required to meet biodiversity pattern and / or process thresholds. These includes any area that required for meeting pattern thresholds, namely remaining of areas Critically Endangered vegetation types and area required to protect threatened species; any area that is required for meeting process thresholds such as areas important for climate change adaptation; hydrological process area such as high priority wetland and catchments pan clusters and pans within priority catchments. In addition to the above areas where there is little or no choice of area identified, CABs includes all 'best design' sites in terms of meeting pattern and process threshold, identified by the iterative conservation planning process. 'Best Design' refers to identified network of natural sites that meet pattern and process thresholds in all vegetation types and features in a spatially efficient and ecologically robust way, and aim to avoid conflict with other activities (e g economic activity)where it is possible to achieve biodiversity thresholds elsewhere.</i></p>	<p>Mr L Siphuma CoT</p>	<p>Letter</p>	<p>15 April 2014</p>	<p>No CBAs occur within the proposed project area and the majority of the area has been impacted on by previous and existing mining activities. However, an ecological assessment will be conducted to investigate the possible impacts of the proposed project on the existing environment and ecology. The findings of these studies will be incorporated into the EIA report, which will be available for public review / comments.</p>
<p>According to the Bioregional Plan for the Gauteng Metropolitan Municipalities the proposed site is situated within and adjacent to the following areas:</p> <p><i>Ecological Support Area 1: Natural, near natural degraded areas required to be maintained in an ecologically functional state to support Critical Biodiversity Areas and Protected areas. These include floodplain, corridor, catchment, wetland and other process areas that have not been identified as Critical Biodiversity Areas but which needs to be maintained in a functional state to prevent degradation of these areas. ESA1s can include areas which would otherwise have been identified as CBAs except that have been degraded, but which are currently or potentially still important for supporting ecological processes. These areas are a focus for rehabilitation rather than the intensification of land uses.</i></p>	<p>Mr L Siphuma CoT</p>	<p>Letter</p>	<p>15 April 2014</p>	<p>Although it is not anticipated that the proposed project will impact on the existing wetland within the project area, a wetland assessment will be conducted to delineate the wetland, assess its present ecological state and its existing ecological function. This study will also investigate possible impacts the proposed project may have on the wetland, and indicate recommendations and management measures to ensure the ecological function of the wetland is not impacted upon by the proposed landfill facility.</p> <p>An ecological assessment will be conducted during the EIA study to investigate the status of possible ridges within the project area. The findings of this specialist study will be contained in the draft EIA report, which will also detail the recommendations and mitigation measures to prevent or minimise possible impacts.</p> <p>As part of the EIA process, an EMP will be compiled which will detail any rehabilitation that needs to be conducted.</p>

14 SOCIAL IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
<i>We have grown in employing people from 1986—2014 from 100 up to 500 employees this will have to seriously be taken into consideration as their jobs will be in serious jeopardy.</i>	Mr R W Kroon Kroon Gourmet Chicken	Letter	27 February 2014	Comment noted. It is not at this stage envisaged that the landfill development will result in any job losses. A socio-economic assessment will however be conducted during the course of the EIA. The findings of this study will be incorporated into the EIA report, which will be available for public review / comments.
The landfill also brings an additional security risk to our business in the form of trespassers and possible theft.	Mr R W Kroon Kroon Gourmet Chicken	Letter	27 February 2014	Comment noted. With informal waste reclamation not being allowed on Interwaste landfills, the landfill will not attract any unwanted elements to the area that could result in an increased security risk. A socio-economic assessment will however be conducted during the course of the EIA. The findings of this study, which will include safety and security aspects, will be incorporated into the EIA report, which will be available for public review / comments.
<i>We are still in an expansion phase of the company and will create a further 400 jobs. You surely must realise that risk verses capital investment will be influenced negatively with this proposal and will put a hold on expansion and employment.</i>	Mr R W Kroon Kroon Gourmet Chicken	Letter	27 February 2014	Comment noted. The necessary investigations will be undertaken as part of the EIA to determine whether the landfill will have a negative impact on the surrounding community (including then chicken farm), and if so, identify mitigating measures that can be implemented. A socio-economic assessment will also be conducted during the course of the EIA. The findings of this study relating to employment will be incorporated into the EIA report, which will be available for public review / comments.
The proposed landfill site may impact negatively on surrounding property values.	Mr R W Kroon Kroon Gourmet Chicken	Letter	27 February 2014	Comment noted. It is not believed that a well designed, developed and operated landfill will impact negatively on surrounding property values. This is in particular the case since the waste disposal operations will serve as a means of rehabilitating land scarred by mining activities. A socio-economic assessment will however be conducted during the course of the EIA. The findings of this study, which will include impacts on property values, will be incorporated into the EIA report, which will be available for public review / comments.
<i>What are the job creation opportunities linked to the Multisand project specifically in terms of recycling?</i>	Mr R Morudu	Focus Group Meeting	12 March 2014	Recycling opportunities will be investigated, but support from the municipality is required for waste to be separated at source before it is sorted further at dedicated material recovery facilities. From experience there is a high risk associated with recycling at the landfill's waste disposal area as it has a negative impact on the health and safety of the reclaimers. There have been reported accidents on site e.g. a truck that injured one of the reclaimers, resulting in the sorter losing her leg.

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Issue/Concern	Issue raised by	Means of communication	Date	Response
How many employment opportunities will be created by the proposed project?	DWHM	Focus Group Meeting	12 March 2014	Between 20 – 30 permanent opportunities will be created during the operational phase of the proposed project. These opportunities will include various skills levels.
<i>Kroon Chickens contributions to the economy must also be considered and its sustainability rather be enhanced than placed in jeopardy.</i>	Mr R W Kroon Kroon Gourmet Chickens	Letter	27 February 2014	The necessary investigations will be undertaken as part of the EIA to determine whether the landfill will have a negative impact on the surrounding community (including then chicken farm), and if so, identify mitigating measures that can be implemented. A socio-economic assessment will also be conducted during the course of the EIA. The findings of this study relating to employment will be incorporated into the EIA report, which will be available for public review / comments.
<i>If any water pollution occurs no bank will finance any sale of property and would be stuck with the property.</i>	Mr Lemmer De Wildt Resident	Letter	12 April 2014	Comment noted. The proposed landfill will be equipped with a Class B liner that will prevent groundwater pollution. Specialist studies will address the potential impact of the proposed project on water resources. It is therefore not believed that a well designed, developed and operated landfill will impact negatively on surrounding property values. The above will be addressed during the EIA investigations.
The church is currently in the process of constructing a 3 000 sitter temporary structure in which to hold its services. Its future plans include the building of a 14 000 sitter auditorium and later a 30 000 sitter auditorium. The church therefore refuses to subject its membership to potential noise, smells, visual pollution, gaseous emissions, other health hazards, contamination of the soil and underground water by the applicant. It is a fact that; in the Pretoria North / Onderstepoort and Laudium / Atteridgeville dumping sites, there are vagrants who live at or near such dumping sites, and the church is aware of the potential crime incidents that may arise as a result of the establishment of a dumping site.	Mr B Mogalane Rabboni Centre Ministries	Letter	10 April 2014	<p>During the EIA process, various specialist studies will be conducted to assess the potential impacts of the proposed development and also identify measures to mitigate potential impacts. These specialist studies include, but are not limited to:</p> <ul style="list-style-type: none"> • Noise assessment • Visual assessment • Air quality assessment • Soil assessment • Water resources assessment • Socio-economic assessment. <p>The findings of these studies will be incorporated into the draft EIA report, which will be made available for public review / comments.</p> <p>Also, no migrant workers / scavengers will be allowed on the Multisand landfill site. Strict access control, similar to the measures currently implemented at Interwaste's FG landfill, will be implemented.</p>

15 WASTE RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
The reference to the Waste Information System (WIS) in (Section 2) the context of airspace is irrelevant as WIS does not track airspace. Factors such as compaction ration and treatment material are not taken into account.	Mr N Brink EnviroServ	E-mail	25 April 2014	In the case of general waste, waste management specialists make use of the WIS's baseline data (waste tonnage recorded at any particular landfill's weighbridge/s) to determine the volume of airspace consumed over a particular timeframe. Should you require further explanation of the methodology used by waste management specialists, more detailed information can be provided.
<i>The reference to Minimum Requirements for Waste Disposal by Landfill is wrong as new Regulations, Norms and Standards were published last year.</i>	Mr N Brink EnviroServ	E-mail	25 April 2014	The new Regulations (referred to above), Norms and Standards do not replace the former Department of Water Affairs and Forestry's Minimum Requirements for Waste Disposal by Landfill, (2nd Edition, 1998) in its entirety. The bulk of Minimum Requirements for Waste Disposal by Landfill is therefore still relevant and applicable to the development, operation and closure of landfills.
<i>As both mining and landfilling will take place on the same site simultaneously, could it please be clarified how the conflicting requirements of mining legislation and NEMWA would be handled and if approval needs to be obtained from the DME as well?</i>	Mr N Brink EnviroServ	E-mail	25 April 2014	It is assumed that this comment refers to DMR (Department of Mineral Resources) and not DME. The proposed Multisand landfill will not be the first landfill in South Africa to co-exist with active surface mining operations, and it is not envisaged that there will be conflicting requirements. Should this however be the case, the more stringent requirement will be complied with. Since the landfill operation will become the means of rehabilitation for the mined quarries, the Environmental Management Programme Report (EMPr) and Closure Plan for the mine will be amended and resubmitted to DMR to reflect this change.
<i>Treatment technologies are going to be acquired for treating hazardous waste prior to disposal. It is not clear that an assessment of these technologies and alternatives has been considered and it has not been included under specialist studies.</i>	Mr N Brink EnviroServ	E-mail	25 April 2014	The 'treatment' to be undertaken at the proposed facility is envisaged to entail the mechanical blending of certain waste streams with appropriate treatment agents (e.g. ash, lime, sawdust, etc.) in impermeable bunkers, under roof. The aforementioned structure would be constructed so as to ensure no contact between the waste being treated and the adjacent soil, surface water and ground water environments.
<i>The estimated landfill life for TWG site is 27 years for Bon Accord and 25 years for Mooiplaats and is quoted incorrectly in the report. The consultant could have contacted TWG to obtain the latest information. The figure quoted above is without any waste minimisation efforts. Phase 2 of the Mooiplaats development has a further estimated life of 15 -20 years. There are plans being effected that will also result in a significant increase in airspace at the Ban Accord landfill.</i>	Mr D van Niekerk The Waste Group	Letter	30 April 2014	Thank you for bringing this to our attention. The information presented in Table 2.1 was sourced from the "General Waste Minimisation Plan for Gauteng - July 2009". Due to various critical variables having a direct impact, it is however in general difficult to accurately determine the remaining airspace and subsequently the remaining life of operating landfills. With the remaining airspace for any landfill presented as the difference between the existing landform at any given time, and the approved final landform, this is influenced by the permitted / licensed height and allowable side slopes to which the landfill is to be developed. Should any of these variables change, or should the footprint of the landfill be

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Issue/Concern	Issue raised by	Means of communication	Date	Response
				<p>increased beyond the area initially earmarked for waste disposal, the remaining airspace will be affected.</p> <p>In addition to the impact of the remaining airspace, the remaining life of any particular landfill is also affected by the waste disposal rate. The latter is influenced by the demand for waste disposal facilities in a particular region. It is further to be recognised that closure of any existing private or municipal landfill not replaced by a new landfill, will result in more waste being diverted to the remaining landfills.</p> <p>Regarding your reference to waste minimisation actions proposed by TWG, we wish to comment as follows:</p> <p>Although waste minimisation and recycling is given preference over waste disposal in terms of the National Environmental Management: Waste Act (Act 59 of 2008), realisation thereof is not that simple. It can be expected to take some time before waste minimisation and recycling initiatives will have any meaningful impact on the need for landfills in South Africa. Recent experiences confirmed that unless waste is separated at source into recyclable and non-recyclable waste, it is unlikely that material recovery facilities (MRF's) receiving mixed waste will be financially viable and therefore sustainable if not subsidised. With very few South African municipalities in a financial position to subsidise recycling initiatives, it is questionable whether waste minimisation initiatives will make a meaningful difference to the remaining life of landfills in the foreseeable future.</p> <p>It is to be recognised that the direct distances between the proposed Multisand landfill and the existing Bon Accord and Mooiplaats landfills are in the order of 20 km and 30 km respectively. Considering that the travelling distance by road can be 50% more than the direct distance (i.e. 30 km and 45 km between Multisand and the respective TWG landfills), there is room for the proposed Multisand landfill in the north-west of Tshwane, despite the existence of the Mooiplaats landfill situated towards the southwest of Tshwane and Bon Accord landfill towards the centre of Tshwane north.</p> <p>The need for the Multisand landfill is finally supported by the fact that the Rosslyn landfill was in operation over an extended period of time, together with all other public and private landfills in the area. The Multisand landfill is therefore considered to be a replacement for the closed Rosslyn landfill.</p>
<p><i>It is stated that Onderstepoort and Ga-Rankuwa landfills have 9-14 years airspace left, why does report say landfill in the north and north western side of Tshwane lacking if there are</i></p>	<p>Mr D van Niekerk The Waste Group</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>As indicated above, the information presented in Table 2.1 was sourced from the "General Waste Minimisation Plan for Gauteng - July 2009". Table 2.1 does however not indicate the remaining life for Onderstepoort</p>

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Issue/Concern	Issue raised by	Means of communication	Date	Response
<p><i>two Tshwane landfills with approximately 9 -14 years airspace as well as TWG's Bon Accord site with minimum 27 years remaining life. There is also the Hartebeesfontein Regional landfill (Madibeng Local Municipality) a mere 15kms west of the proposed site, the remaining airspace is unknown to TWG but based on the site boundaries and the area used should be considerable and should therefore be taken into account in this report.</i></p>				<p>and Ga-Rankuwa to be 9-14 years, but rather 2 and 8 years respectively. The assumed base date is 2015 when it is expected that the Multisand landfill will be licensed.</p> <p>It is further important to note that the distance between the proposed Multisand landfill and the existing Ga-Rankuwa landfill (nearest to Multisand) is similar to the distance between the Bon Accord landfill and the existing Onderstepoort landfill (nearest to Bon Accord). Despite the "close proximity" of the Onderstepoort landfill, TWG's predecessor (Mini Waste) considered it necessary to license and develop the Bon Accord landfill in the early 1990's. Both the Onderstepoort and Bon Accord landfills are still operational in 2014.</p> <p>Despite the 3 year remaining life for the Rosslyn landfill as indicated in the "General Waste Minimisation Plan for Gauteng - July 2009" for a base date 2015, this landfill is no longer in operation. It is once again important to note that the privately owned Rosslyn landfill co-existed with the (i) municipal Onderstepoort, (ii) municipal Ga-Rankuwa and (iii) private Bon Accord landfills over an extensive period of time. With the recent closure of the Rosslyn landfill, it is therefore evident that there is a need for another privately owned landfill in the region.</p> <p>As far as the Madibeng Local Municipality's Hartebeesfontein regional landfill is concerned, it is general practise for municipalities not to make airspace available to neighbouring municipalities. This is mainly due to a general shortage of airspace on municipal landfills, resulting in municipalities reserving airspace for its own use. It can further be expected that a relative small landfill developed and operated by a municipality like the Madibeng Local Municipality will not make a significant impact on the airspace required by a municipality like the Tshwane Metropolitan Municipality.</p>
<p>Various references to treatment of hazardous waste from 500kg upwards as well as the disposal of "any quantity of hazardous waste", why is this in the report if the site license is for a Class B liner only.</p>	<p>Mr D van Niekerk The Waste Group</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>It should be noted that the promulgation of the Department of Environmental Affairs' new Waste Classification and Management Regulations and associated Standards for the Assessment and Disposal of Waste to Landfill removed the linkage between a waste's classification and its disposal requirements; except in instances where a waste is hazardous in terms of SANS 10234 on the basis of a contaminant not listed under the Standard for the Assessment of Waste for Disposal to Landfill. Your concern about Interwaste being allowed to receive hazardous waste to a Class B cell is thus not understood in the context of the new Regulations and Standards; where the acceptance criteria for the disposal of waste to a Class B cell is based on the 'waste type' derived from the Standard for the Assessment of Waste for Disposal to Landfill,</p>

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Issue/Concern	Issue raised by	Means of communication	Date	Response
				<p>and not its classification as either hazardous or non-hazardous. It is conceivable that some of the Type 2, 3 or 4 waste streams that could lawfully be disposed of to the proposed Class B disposal site may be hazardous in terms of SANS 10234, but this does not prohibit their disposal to such a facility – provided that they are assessed to be Type 2, 3 or 4 (with or without treatment) in terms of the aforementioned Standard. It is for this reason that the application for the Waste Management License for the proposed facility has been lodged with the Department of Environmental Affairs, who are the Licensing Authority in respect of applications involving hazardous waste management facilities.</p>
<p><i>The report is confusing in that it refers to the waste situation in Tshwane, yet in Section 4.1 reference is made of increase in fees to clients outside the study area, should the landfill not be licensed. Is this landfill to supplement Tshwane's waste disposal needs or that of Interwaste clients outside the City of Tshwane?</i></p>	<p>Mr D van Niekerk The Waste Group</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>Similar to other commercial regional landfills, the Multisand landfill will not be developed for the exclusive use by any particular municipality; or for private waste generators from a single municipal area. It is expected that TWG should, as the owner of regional landfills, understand that commercial regional landfills are developed to receive waste from various generators within the expected catchment area. A good example of this is TWG's Mooiplaats commercial regional landfill, situated in the Tshwane Municipality's area of jurisdiction, but at times also receiving waste generated in the neighbouring Johannesburg Municipality; collected and transported by Pikitup.</p>
<p><i>If this is a regional facility, why is only the City of Tshwane's figures quoted, again who will the site cater for?</i></p>	<p>Mr D van Niekerk The Waste Group</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>With the proposed Multisand landfill to be located in Tshwane, it is reasonable to expect that the bulk of the waste disposed of on the new landfill will be generated in Tshwane. Also considering that waste generated in Tshwane is significantly more than for areas towards the west and north of Tshwane (within a viable transport distance from the landfill), together with the fact that the landfill will be situated in Tshwane, is making it reasonable to expect that information presented in the DSR will be related to Tshwane.</p> <p>As explained earlier, regional landfills are developed to receive waste from various waste generators within a viable transport distance. With the proposed Multisand landfill to be located on the border between Gauteng and the Northwest Province, it can be expected that the new landfill will also draw waste from the Northwest Province.</p>
<p>The site identification report, Appendix A, did not take the two TWG landfills into consideration.</p>	<p>Mr D van Niekerk The Waste Group</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>Although Appendix A indicated the source of information used for existing landfills to be a study undertaken for the CoT during November 2004, the absence of information regarding the TWG landfills is clearly an oversight and will be corrected. Although attempts were made to obtain more recent versions of the CoT's Integrated Waste Management Plans, Mr. Frans Decker indicated that although a draft IWMP was circulated internally for comments by December 2013, this document was at the</p>

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Issue/Concern	Issue raised by	Means of communication	Date	Response
				<p>time not available for public release.</p> <p>Despite the fact that the Bon Accord and Mooiplaats landfills were not referred in the site selection report, it was indicated earlier that the travelling distances between the proposed Multisand landfill and the existing Bon Accord and Mooiplaats landfills are in the order of 30 and 45 km respectively. In addition to the fact that these distances indicate that there is room for another landfill in the north-west of Tshwane, it is confirmed by the fact that the Rosslyn commercial landfill, that co-existed with the other public and private landfills in the same area over a long period of time, is no longer in operation.</p>
How many tonnes of waste to be disposed of at the proposed Multisand landfill on daily basis?	Ms S Bhailall CoT	Focus Group Meeting	11 March 2014	The exact tonnages will only be determined subsequent to final design. However, it will be classified as a Class B site, which will cater for more than 500 tonnes/day.
Does Class B Landfill site have limits on the type of waste it can receive?	DWHM	Focus Group Meeting	12 March 2014	The Class B landfill accommodates mostly general waste, but according to the new classification of waste, it can also accept low risk hazardous waste.
Will the proposed waste site cater for industrial waste?	DWHM	Focus Group Meeting	12 March 2014	The proposed landfill will cater for domestic, commercial and industrial general waste, as long as it fits in with the approved waste classification. The proposed Multisand landfill will be a large regional facility, serving a larger area instead a number of smaller landfills serving smaller communities.
Since the proposed landfill is privately owned, will it also cater for Madibeng's waste?	DWHM	Focus Group Meeting	12 March 2014	Madibeng's waste can be disposed of at the proposed Multisand landfill.
There is no control of what waste is dumped at other sites in the region e.g. Onderstepoort. How will the waste dumped be controlled at the proposed Multisand site?	DWHM	Focus Group Meeting	12 March 2014	Interwaste, as a private and JSE listed company will adhere to the minim requirements for operating a landfill site. All waste will be classified on site, and only waste within the approved classification will be allowed to be disposed of at the proposed site. Interwaste will be liable for pollution up to 30 years subsequent to the closure of the landfill site. For this reason, strict measures will be put in place to manage and control the types of waste disposed of at the proposed landfill.
Section 2.1.4. Why is waste from neighbouring areas around Gauteng and Brits brought into our farming area?	Mr J Schoeman Primeco Meat	Letter	30 April 2014	Regional landfills are developed to receive waste from various waste generators within a viable transport distance. With the proposed Multisand landfill to be located on the border between Gauteng and the Northwest Province, it can be expected that the new landfill will also draw waste from the Northwest Province.
<i>Although not mentioned in the executive summary there are various references to hazardous waste In the document, the executive summary is therefore misleading, Why bring hazardous waste to our area. Refer to typical types of waste</i>	Mr J Schoeman Primeco Meat	Letter	30 April 2014	The Executive Summary is intended to be a summary of the DSR, and therefore not a standalone document. The Executive Summary should always be read in conjunction with the DSR. Please note that the Executive Summary does not repeat all the detailed information

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Issue/Concern	Issue raised by	Means of communication	Date	Response
<p><i>accepted - Type 2, 3 and 4 waste streams for disposal (general and hazardous) In the said table.</i></p>				<p>presented in the overall DSR.</p> <p>It should be noted that the promulgation of the Department of Environmental Affairs' new Waste Classification and Management Regulations and associated Standards for the Assessment and Disposal of Waste to Landfill removed the linkage between a waste's classification and its disposal requirements; except in instances where a waste is hazardous in terms of SANS 10234 on the basis of a contaminant not listed under the Standard for the Assessment of Waste for Disposal to Landfill. The acceptance criteria for the disposal of waste to a Class B cell is based on the 'waste type' derived from the Standard for the Assessment of Waste for Disposal to Landfill, and not its classification as either hazardous or non-hazardous.</p>
<p><i>Treatment of Hazardous waste as per the NEMWA - excess of 1 tonne per day. Please provide detail on the intended storage of hazardous waste i.e. quantity and type. Same comment regarding the executive summary as above, applies.</i></p>	<p>Mr J Schoeman Primeco Meat</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>Whilst 'waste disposal' and 'waste treatment' are indeed distinct listed activities under GN R 718 of 3 July 2009 (and amendments thereto on 29 November 2013), these two management activities need not be mutually exclusive in the context of a proposed disposal facility. The treatment of waste destined for disposal to landfill (whether it be hazardous or non-hazardous) is common practice aimed at minimising the impact of the waste on the environment prior to disposal thereof, and 'protecting' the quality of any leachate potentially produced from the landfill.</p>
<p><i>Table 3-1. - Activity 7 of the NEMWA Disposal of any quantity of hazardous waste to land. Please provide detail on the Intended disposal of hazardous waste. Same comment regarding the executive summary as above, applies.</i></p>	<p>Mr J Schoeman Primeco Meat</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>It should be noted that the promulgation of the Department of Environmental Affairs' new Waste Classification and Management Regulations and associated Standards for the Assessment and Disposal of Waste to Landfill removed the linkage between a waste's classification and its disposal requirements; except in instances where a waste is hazardous in terms of SANS 10234 on the basis of a contaminant not listed under the Standard for the Assessment of Waste for Disposal to Landfill. The acceptance criteria for the disposal of waste to a Class B cell is based on the 'waste type' derived from the Standard for the Assessment of Waste for Disposal to Landfill, and not its classification as either hazardous or non-hazardous.</p> <p>As indicated above, the Executive Summary should always be read in conjunction with the DSR.</p> <p>Exact figures on the tonnages of Class 2, 3 and 4 general and low hazardous waste to be disposed of on the proposed Class B landfill cannot be provided at this stage, since it will be determined by the demand for disposal of such waste. It is further to be recognised that the tonnages will change throughout the life of the landfill due to fluctuating demand; therefore the <i>Minimum</i> threshold of 500 tons per day for a Class</p>

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				B landfill
Activity 13 of the NEMA EIA listed activities - Storage and handling of dangerous goods. What dangerous goods are referred to?	Mr J Schoeman Primeco Meat	Letter	30 April 2014	Facilities will be constructed for the provision and storage of fuel for plant used to operate the landfill. These facilities will have a combined capacity of less than 500 cubic metres.
It is indicated that Onderstepoort and Ga-Rankuwa has between 9-14 years left available for waste disposal. Indicate why it is stated that there are not enough disposal facilities nearby.	Mr J Schoeman Primeco Meat	Letter	30 April 2014	<p>The information presented in Table 2.1 was sourced from the "General Waste Minimisation Plan for Gauteng - July 2009". Table 2.1 does however not indicate the remaining life for Onderstepoort and Ga-Rankuwa to be 9-14 years, but rather 2 and 8 years respectively. The assumed base date is 2015 when it is expected that the Multisand landfill will be licensed. Due to various critical variables having a direct impact, it is however in general difficult to accurately determine the remaining airspace and subsequently the remaining life of operating landfills.</p> <p>With the remaining airspace for any landfill presented as the difference between the existing landform at any given time, and the approved final landform, this is influenced by the permitted / licensed height and allowable side slopes to which the landfill is to be developed. Should any of these variables change, or should the footprint of the landfill be increased beyond the area initially earmarked for waste disposal, the remaining airspace will be affected.</p> <p>In addition to the impact of the remaining airspace, the remaining life of any particular landfill is also affected by the waste disposal rate. The latter is influenced by the demand for waste disposal facilities in a particular region. It is further to be recognised that closure of any existing private or municipal landfill not replaced by a new landfill, will result in more waste being diverted to the remaining landfills.</p>
<i>Please define the study area since It seems as if you are taking Tshwane, then Gauteng and then North West. We live In Tshwane, why should waste from neighbouring communities and even provinces be disposed next to us?</i>	Mr J Schoeman Primeco Meat	Letter	30 April 2014	<p>Similar to other commercial regional landfills, the Multisand landfill will not be developed for the exclusive use by any particular municipality; or for private waste generators from a single municipal area.</p> <p>With the proposed Multisand landfill to be located in Tshwane, it is reasonable to expect that the bulk of the waste disposed of on the new landfill will be generate in Tshwane. Also considering that waste generated in Tshwane is significantly more than for areas towards the west and north of Tshwane (within a viable transport distance from the landfill), together with the fact that the landfill will be situated in Tshwane, is making it reasonable to expect that information presented in the DSR will be related to Tshwane.</p> <p>As explained earlier, regional landfills are developed to receive waste from various waste generators within a viable transport distance. With the proposed Multisand landfill to be located on the border between Gauteng and the Northwest Province, it can be expected that the new landfill will</p>

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<p><i>One of the objectives refer to additional landfills of Tshwane, no mention is made of other areas, do we then assume you intend dealing with waste from Tshwane only or the other areas mentioned as well, The report is confusing. Since 'the last paragraph states that the study area is mainly the City of Tshwane are north of the Magaliesberg Mountain. From where will waste come to this site?</i></p>	<p>Mr J Schoeman Primeco Meat</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>also draw waste from the Northwest Province. With the proposed Multisand landfill to be located in Tshwane, it is reasonable to expect that the bulk of the waste disposed of on the new landfill will be generated in Tshwane. Also considering that waste generated in Tshwane is significantly more than for areas towards the west and north of Tshwane (within a viable transport distance from the landfill), together with the fact that the landfill will be situated in Tshwane, is making it reasonable to expect that information presented in the DSR will be related to Tshwane.</p>
<p><i>There Is still confusion regarding the term "regional" vs City of Tshwane. Will this site cater for waste from City of Tshwane only or will It receive waste from other areas and if so how much?</i></p>	<p>Mr J Schoeman Primeco Meat</p>	<p>Letter</p>	<p>30 April 2014</p>	<p>As explained earlier, regional landfills are developed to receive waste from various waste generators within a viable transport distance. With the proposed Multisand landfill to be located on the border between Gauteng and the Northwest Province, it can be expected that the new landfill will also draw waste from the Northwest Province.</p>
<p>A complete waste handling and management procedure for operation must be included in the EIA report.</p>	<p>Mr L Siphuma CoT</p>	<p>Letter</p>	<p>15 April 2014</p>	<p>An EMPr, including waste handling and management procedures, will be compiled during the EIA phase of the EIA. The EMP will be appended to the draft EIA report which will be made available for public review / comments.</p>

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Issue/Concern	Issue raised by	Means of communication	Date	Response
<p><i>The statement is made that a Class B disposal facility “comprises the following components” which are then listed. Included in the list is Waste treatment facility. We dispute that waste treatment is part of waste disposal as it is a separate listed activity which requires licensing as such. The inclusion of this activity points to the fact that the site will be receiving hazardous waste which will be treated to allow for disposal into Class B cells. The report seems to be silent on this fact.</i></p>	<p>Mr N Brink EnviroServ</p>	<p>E-mail</p>	<p>25 April 2014</p>	<p>Whilst ‘waste disposal’ and ‘waste treatment’ are indeed distinct listed activities under GN R 718 of 3 July 2009 (and amendments thereto on 29 November 2013), these two management activities need not be mutually exclusive in the context of a proposed disposal facility. The treatment of waste destined for disposal to landfill (whether it be hazardous or non-hazardous) is common practice aimed at minimising the impact of the waste on the environment prior to disposal thereof, and ‘protecting’ the quality of any leachate potentially produced from the landfill.</p> <p>It should be noted that the promulgation of the Department of Environmental Affairs’ new Waste Classification and Management Regulations and associated Standards for the Assessment and Disposal of Waste to Landfill removed the linkage between a waste’s classification and its disposal requirements; except in instances where a waste is hazardous in terms of SANS 10234 on the basis of a contaminant not listed under the Standard for the Assessment of Waste for Disposal to Landfill. Your reference to treatment being used as a means of allowing Interwaste to receive hazardous waste to a Class B cell is thus not understood in the context of the new Regulations and Standards; where the acceptance criteria for the disposal of waste to a Class B cell is based on the ‘waste type’ derived from the Standard for the Assessment of Waste for Disposal to Landfill, and not its classification as either hazardous or non-hazardous.</p> <p>It is conceivable that some of the Type 2, 3 or 4 waste streams that could lawfully be disposed of to the proposed Class B disposal site may be hazardous in terms of SANS 10234, but this does not prohibit their disposal to such a facility – provided that they are assessed to be Type 2, 3 or 4 (with or without treatment) in terms of the aforementioned Standard. It is for this reason that the application for the Waste Management License for the proposed facility has been lodged with the Department of Environmental Affairs, who are the Licensing Authority in respect of applications involving hazardous waste management facilities.</p>

16 HERITAGE IMPACT ASSESSMENT AND RELATED ISSUES

Issue/Concern	Issue raised by	Means of communication	Date	Response
The DSR indicated that cemeteries were identified within the project area. These sites are important and should be protected.	Mr L Siphuma CoT	Letter	15 April 2014	Comment noted. A heritage impact assessment will be conducted as part of the EIA process. Where required, resources of cultural or heritage importance will be protected.