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**ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED DEVELOPMENT OF THE MULTISAND REGIONAL CLASS B WASTE DISPOSAL FACILITY, NEAR TSHWANE, GAUTENG PROVINCE: GDARD REF NO – GAUT 002/13-14/E0280; DEA REF NO – 12/9/11/L1422/3**

**Comments on Draft Scoping Report for the proposed Multisand Regional Waste Disposal Facility**

Set out below are The Waste Group's comments as an Interested and Affected Party, to the above mentioned project:

- Table 2.1 Estimated landfill life for TWG site are 27 years for Bon Accord and 25 years for Mooiplaats and are 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 Bon Accord landfill;
- Table 2.1 Onderstepoort and Ga-Rankuwa 9-14 years, why does report say landfill in the north and north western side of Tshwane lacking if there are 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;
- Table 2-3 The executive summary does not make mention of any type of hazardous waste yet the table mentions types 2, 3 and 4 waste (general and hazardous);
- Table 3-1 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;

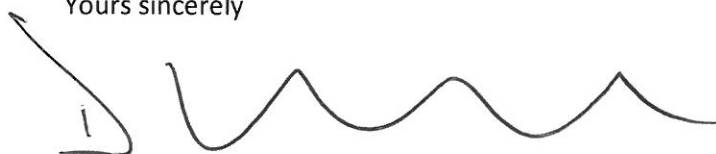
- The report is confusing in that it refers to the waste situation in Tshwane, yet in 4.1 reference is made of increase in fees to clients outside the study area, should the landfill not be licensed. Is this landfill to supplement Tshwane's waste disposal needs or that of Interwaste clients outside the City of Tshwane?;
- 5.3 If this is a regional facility, why is only the City of Tshwane's figures quoted, again who will the site cater for;
- The site identification report, Appendix A, did not take the two TWG landfills into consideration;
- 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?

In Summary, the 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;
- 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;
- The executive summary only mentions Gauteng, yet in the report under 2.1.4, neighbouring areas such as Brits is mentioned;
- 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.

We trust the above mentioned aspects will be addressed in the final Scoping report to inform the stakeholder's of the actual intend of the facility in an un-ambiguous manner.

Yours sincerely



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CEO