

## Appendix F: Copies of Correspondence Sent to I&APs

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### Letter 1: Notice of the Scoping and EIA process

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6 June 2011

«Title» «First\_Name» «Surname»  
«Organisation»  
«Address1»  
«Address2»  
«City»  
«Code»

Dear «Title» «Surname»

**RE: Notice of Scoping and Environmental Assessment Process Proposed Composting and Fertiliser Processing Plant (Venter Fert) on Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality**

In terms of the NEMA 2010 EIA Regulations (as amended) published in GN 543, 544, 545 and 546 in Government Gazette No. 33306 of 18 June 2010 (as amended), you have been identified as an interested and affected party (I&AP) for the project above and have been included on the project I&AP database.

Die Boeram Venter Trust (project applicant) is proposing the establishment and operation of a composting and fertiliser processing plant on Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality. The project, referred to as Venter Fert, entails the establishment and operation of a composting and fertiliser processing plant. The applicant proposes to produce fertiliser primarily from the composting of poultry litter, using an aerobic process. It is estimated that the facility will receive approximately 75 000m<sup>3</sup> (30 000 tons) of poultry litter annually from which they will produce approximately 25 000m<sup>3</sup> of fertiliser annually. The composting footprint will consist of 120 rows or windrows of poultry litter; each approximately 3m wide, 1.5m high and 100m long; with 3 production cycles of approximately 4 months each, proposed per year.

It is proposed that two footprints are set aside, one for the establishment of the composting facility (approximately 10 ha) and one for the fertiliser processing plant (approximately 0.5 ha), with a total development footprint of 10.5 ha (including services and internal roads). Farm 715, approximately 377.0162 ha, is currently zoned for agricultural use and is currently being used for game farming.

#### LEGISLATIVE REQUIREMENTS

The following provides an overview of the relevant legislation pertinent to this EIA. Further detailed information is contained in the Background Information Document included with this correspondence.

##### *NEMAA 2010 EIA Regulations (as amended)*

In terms of the National Environmental Management Act (Act No. 107 of 1998) as amended ("NEMAA") and the NEMA 2010 EIA regulations, GN R 543, 544, 545 and 546 published in Government Gazette 33306 on the 18 June 2010 (as amended), the project requires Scoping and Environmental Impact Assessment (S&EIR), in particular because it includes, amongst others, the following Activity in GN R 545:

26. *Commencing of an activity, which requires an atmospheric emission license in terms of section 21 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), except where such commencement requires basic assessment in terms of Notice of No. R544 of 2010.*

The issuing authority is the Provincial Department of Economic Development and Environmental Affairs, Cacadu Region.

***National Environmental Management Waste Act (No. 59 of 2008)***

The project also requires a Basic Assessment for a Waste Licence in terms of the National Environmental Management: Waste Act (Act No. 59 of 2008) in terms of Category A listed activities in GN R 718 published on the 3 July 2009, amongst others:

*(17) The storage, treatment or processing of animal manure at a facility with a capacity to process in excess of one ton per day.*

The issuing authority is the Provincial Department of Economic Development and Environmental Affairs, Cacadu Region. Full Scoping and EIA will be applied to this listed activity.

***NEM: Air Quality Act (39 of 2004)***

In terms of the National Environmental Management: Air Quality Act (39 of 2004), GN 248 published in Government Gazette 33064 on the 21 March 2010, lists activities which require an Atmospheric Emissions Licence (AEL). An AEL is required in terms of Category 10: Animal Matter Processing. The licensing authority for the AEL is the Nelson Mandela Bay Municipality (NMBM).

Die Boeram Venter Trust (project applicant) has appointed Public Process Consultants, as the independent Environmental Assessment Practitioner, to undertake the Scoping and EIA process for the project. An application for Scoping and EIA has been submitted to the Provincial Department of Economic Development and Environmental Affairs (DEDEA) and upon completion of the Air Quality Specialist Assessment an application for an AEL will be submitted to the NMBM.

In terms of Chapter 6 of GN R 543 interested and affected parties are required to register their interest on the database for the project. In order to register on the database please clearly state any interest you may have in this matter, as well as raise issues for inclusion in the Draft Scoping Report and submit within 30 days to the consultant, contact details above, by the 8 July 2011.

To assist you in the submission of your comments we have enclosed with this correspondence a Background Information Document (BID) on the project as well as a comment form. Copies of the BID and comment form can be downloaded through the website [www.publicprocess.co.za](http://www.publicprocess.co.za). Additional issues may be raised once the Draft Scoping Report is released for a 40 day I&AP review period. As a registered I&AP on the project database you will be notified of this comment period in writing.

Should you have any queries or require additional information please contact Sandy Wren or Paul Steyn using the contact details provided above.

Yours sincerely



**Sandy Wren**

## Comment Form

### **PUBLIC INVOLVEMENT PROCESS REGISTRATION AND COMMENT FORM**

#### **SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT PROCESS**

##### **Venter Fert, Composting and Fertiliser Processing Plant**

Die Boeram Venter Trust (project applicant) is proposing the establishment and operation of a composting and fertiliser processing plant on Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality.

Key Listed Activity **NEMAA 2010 EIA Regulations** (as amended): GN R 545 (26)

Key Listed Activity **NEM: Waste Act (No. 59 of 2008): GN R 718, Category A. (17.)**

**NEM: Air Quality Act (39 of 2004), GN 248, Category 10: Animal Matter Processing.**

Return Completed Reply Form to:

*Public Process Consultants, PO Box 27688, Greenacres 6057*

*Phone: 041 – 374 8426 or Fax 041-373 2002 or Email [sandy@publicprocess.co.za](mailto:sandy@publicprocess.co.za)*

**Complete all Relevant Sections Below and Return By: 8 July 2011**

Please provide your full contact details:

<i>FIRST NAME:</i>	<i>SURNAME:</i>
<i>ORGANISATION:</i>	<i>TITLE:</i>
<i>POSTAL ADDRESS:</i>	
<i>CODE:</i>	
<i>PHONE:</i>	<i>FAX:</i>
<i>CELL:</i>	<i>EMAIL:</i>

**NOTE:** You are required to register as an I&AP in order to receive further information and correspondence regarding the EIA process.

Please clearly state any interest you may have in the project and/or list the issues or questions you may have (use additional pages if required)

*Registration and comments form for Issues & Concerns*



## Background Information Document and Locality Map

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### **SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT**

***Environmental Authorisation (NEMAA 2010 EIA Regulations)***  
***Waste Licence Application (NEM:WA)***  
***Atmospheric Emissions Licence (NEM: AQA)***

***Project: Venter Fert (Composting and Fertiliser Plant)***  
***Applicant: Die Boeram Venter Trust***



### **Background Information Document, June 2011**

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#### **INTRODUCTION**

Die Boeram Venter Trust (project applicant) is proposing the establishment and operation of a composting and fertiliser processing facility on Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality. The farm is currently zoned agriculture use and falls outside of the urban edge of the Nelson Mandela Bay Municipality (NMBM). The farm measures approximately 377.0162 ha in extent and it is proposed that two footprints are set aside, one for the establishment of a composting facility (approximately 10 ha) and one for the fertiliser processing plant (approximately 0.5 ha), with a total development footprint of 10.5 ha (including services and internal roads).

In terms of the National Environmental Management Act (Act No. 107 of 1998) as amended ("NEMAA") and the NEMA 2010 EIA regulations (as amended), the project requires full Scoping and Environmental Impact Assessment (S&EIR) as well as public participation for activities listed therein. The project also requires a Waste Licence in terms of the National Environmental Management Waste Act (NEM:WA), Act 59 of 2008, and an Atmospheric Emissions Licence (AEL) in terms of the National Environmental Management: Air Quality Act (NEM:AQA), Act 39 of 2004, which is issued by the Nelson Mandela Bay Municipality.

An application for Environmental Authorisation and a Waste Licence has been submitted to Provincial Department of Economic Development and Environmental Affairs (DEDEA) and upon completion of the Air Quality Specialist assessment an application for an AEL will be submitted to the Nelson Mandela Bay Municipality. The applicant has appointed Public Process Consultants as the independent Environmental Assessment Practitioner to manage the Scoping and EIA process for this project.

#### **WHAT DOES THIS DOCUMENT TELL YOU?**

This document provides you, as an interested and or affected party (I&AP) with background information on the proposed project as well as the Environmental Assessment and Public Participation process that will be undertaken for the project.

It indicates how you can become involved in the project, receive information and raise issues of concern for inclusion in the Scoping and EIA process. The sharing of information forms an important component of the Public Participation process and provides you with the opportunity to become actively involved in the environmental assessment process from the outset. The input received from I&APs together with scientific investigations assists the responsible authority, in this instance the Provincial Department of Economic Development and Environmental Affairs (DEDEA) and the Nelson Mandela Bay Municipality, with their decision-making.

#### **ALTERNATIVES AND SITE SELECTION**

A key component of the Environmental Impact Assessment process is the identification and assessment of reasonable and feasible alternatives. The following alternatives have been identified and will be considered in the assessment process:

- No-go alternative
- Site alternatives
- Layout alternatives

- Alternatives raised by IA&Ps, specialists and the technical team

Reasonable and feasible alternatives as raised by I&APs, specialists and the technical team will be considered in the assessment process.

## OVERVIEW OF THE PROJECT

There are two components to the project, which are the subject of this assessment process, namely, the composting facility (approximately 10 ha) and the fertiliser processing plant including associated infrastructure such as internal roads (approximately 0.5ha).

### *Composting Facility*

The applicant proposes to produce fertiliser primarily from the composting of poultry litter, using an aerobic process. Composting is a natural process of decomposing organic matter by microorganisms under controlled conditions, which enhances the suitability of the poultry litter for application to land as a fertiliser.

It is estimated that the facility will receive approximately 75 000m<sup>3</sup> (30 000 tons) of poultry litter annually from which they will produce approximately 25 000m<sup>3</sup> of fertiliser annually. It is anticipated that up to 10 000 tons of poultry litter may be stored on the site at any one time during a production cycle, with 3 production cycles proposed per year.

The poultry litter will be sourced from various poultry production facilities in and around the Metro where it will be delivered directly to the site to be placed in windrows, 3m wide, 1.5m high and 100m long. Gaps of approximately 2m wide are required between the rows to allow for the movement of vehicles and machinery for watering, turning and collection of the compost. It is estimated that the footprint will comprise 120 rows over approximately 10ha. It is proposed that the composting site is ideally located on a gentle sloping well drained surface with suitable stormwater infrastructure to manage potential runoff from the site.

The poultry litter, once delivered, will be dated and will remain in a windrow for a period of between 2 to 4 months until it is fully composted. The compost will be irrigated once during the first week of the cycle in order to maintain the optimum moisture content. The total composting time is determined by the heat and moisture content of the compost, which is monitored throughout the composting process. The compost requires regular turning, depending on heat and moisture content, approximately once a week during the first two months and once every two weeks during the last two months. Additional tests for pathogens and microbes are undertaken every third week during the estimated 2 to 4 month cycle.

The composting time is anticipated to fluctuate depending on the time of the year. Due to the staged nature of the process it is unlikely that all 120 rows will be in use at exactly the same time. It is however estimated that the site will accommodate 3 cycles annually (3 x 4 months). At the end of each composting cycle the fertiliser is transported via tractor-trailer to the fertiliser processing facility.

### **Fertiliser Processing Plant**

The fertiliser processing plant will be a fully enclosed roofed structure with a footprint of approximately 2400m<sup>2</sup> and 20 m high. Within the plant the fertiliser is processed to provide:

- Fertiliser for commercial collection
- Inorganic fertiliser
- Organic fertiliser
- Pelletised fertiliser

The facility can be divided into the following areas:



- Product intake area
- Processing area
- Storage and collection area
- Services and offices (boiler, electricity, compressed air, work shed)

The composting facility and fertiliser plant will include internal roads which will be used for the transportation of compost and fertiliser for collection. As far as possible, existing internal vehicle tracks will be used. It is proposed, subject to specialist assessment of the borehole yield, that the existing borehole on the site is used for the irrigation of the compost during the first week of the cycle. The fertiliser processing plant will need to be provided with bulk services (water, electricity and sanitation).

#### SCOPING AND ENVIRONMENTAL ASSESSMENT PROCESS

An overview of the relevant legislation pertinent to this EIA is indicated below.

##### *NEMAA 2010 EIA Regulations (as amended)*

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as amended ("NEMAA") and the NEMA 2010 EIA regulations, GN R 543, 544, 545 and 546 published in Government Gazette 33306 on the 18 June 2010 (as amended), the project requires Scoping and Environmental Impact Assessment (S&EIR), in particular because it includes the activities listed below in GN R 544, R 545 and R 546. The decision making authority is the Provincial Department of Economic Development and Environmental Affairs, Cacadu Region and the project may not commence until such time as an environmental authorisation is issued.

<b>GN R 544 requiring a Basic Assessment</b>	
8. The construction of a hatchery or <b>agri-industrial infrastructure</b> outside industrial complexes where the development footprint covers an area of 2 000 square metres or more.	The zoning for the fertiliser processing plant will be determined by the projects Town Planners (Urban Dynamics), in consultation with the relevant authorities, during the EIA process. The composting facility and the fertiliser processing facility will exceed 2000m <sup>2</sup> .
23. The transformation of undeveloped, vacant or derelict land to (ii) residential, retail, commercial, recreational, industrial or institutional use, outside an urban area and where the total area to be transformed is bigger than 1 hectare but less than 20 hectares; -	The site is currently being used for game farming and falls outside an urban area. The area to be transformed is estimated to be approximately 10.5 ha. The zoning for the project will be determined by the projects Town Planners, in consultation with the relevant authorities, during the EIA process.
<b>GN R 545 requiring Scoping and EIA</b>	
5. The construction of facilities or infrastructure for any process or activity which requires a permit or license in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent and which is not identified in Notice No. 544 of 2010 or included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case that Act will apply.	In terms of the National Environmental Management: Air Quality Act, 39 of 2004, section 21, Category 10: Animal Matter Processing, an application for an atmospheric emissions licence will be required from the Nelson Mandela Bay Municipality (see 26. below) for emissions associated with the composting facility.  The composting facility will in addition also require a waste management licence in terms of the NEM: Waste Act. The construction of the composting facility, which will result in emissions, will be addressed in the Scoping and EIA process for the project.
26. Commencing of an activity, which requires an atmospheric emission license in terms of section 21 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), except where such commencement requires basic assessment in terms of Notice of No. R544 of 2010.	In terms of the National Environmental Management: Air Quality Act, 39 of 2004, section 21, Category 10: Animal Matter Processing, an application for an atmospheric emissions licence will be required from the Nelson Mandela Bay Municipality. The project will entail the drying, dehydrating and evaporating of animal matter not intended for human consumption of more than 1 ton per day.

<b>GN R 546 requiring a Basic Assessment</b>	
<p>4. The construction of a road wider than 4 metres with a reserve less than 13,5 metres.</p> <p>(a) In Eastern Cape...:</p> <p>ii. Outside urban areas, in:</p> <p>(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p>	<p>The site falls within a critical biodiversity area (CBAT2) as identified in the Eastern Cape Biodiversity Conservation Assessment and Plan. The width of the internal roads and the clearing of vegetation required will be determined through the environmental assessment process.</p>
<p>13. The clearance of an area of 1 hectare or more of vegetation where 75% or more of the vegetative cover constitutes indigenous vegetation, except where such removal of vegetation is required for:</p> <p>(1) the undertaking of a process or activity included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), in which case the activity is regarded to be excluded from this list.</p> <p>(a) Critical biodiversity areas and ecological support areas as identified in systematic biodiversity plans adopted by the competent authority.</p>	<p>The site falls within a critical biodiversity area (CBAT2) as identified in the Eastern Cape Biodiversity Conservation Assessment and Plan, however the composting facility will require a Waste Licence and in terms of GN R 546 Activity 13. (1) it is deemed to be excluded from this list for authorisation. However, The clearing of any vegetation for the composting facility will be addressed in the Scoping and EIA process as part of the Waste Licence application in terms of the NEM:WA.</p> <p>The footprint for the fertiliser plant and associated infrastructure is estimated to be approximately 2400m<sup>2</sup>. The clearing of vegetation will be addressed in the Scoping and EIA process.</p>
<p>14. "The clearance of an area of 5 hectares or more of vegetation where 75% or more of the vegetative cover constitutes indigenous vegetation, except where such removal of vegetation is required for:</p> <p>(2) the undertaking of a process or activity included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the activity is regarded to be excluded from this list;</p> <p>(a) In Eastern Cape...:</p> <p>i. All areas outside urban areas."</p>	<p>The site falls outside of the urban edge of the NMBM and within a critical biodiversity area (CBAT2) as identified in the Eastern Cape Biodiversity Conservation Assessment and Plan. However the composting facility will require a Waste Licence and in terms of GN R 546 Activity 12. (2) is deemed to be excluded from this list for authorisation. However, the clearing of any vegetation for the composting facility will be addressed in the Scoping and EIA process to form part of the Waste Licence application.</p> <p>The footprint for the fertiliser plant and associated infrastructure is estimated to be approximately 2400m<sup>2</sup>. The clearing of vegetation will be addressed in the Scoping and EIA process.</p>
<p>19. The widening of a road by more than 4 metres, or the lengthening of a road by more than 1kilometre.</p> <p>(a) In the Eastern Cape...:</p> <p>(ii) Outside Urban Areas, in:</p> <p>(ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p>	<p>The site falls outside of the urban edge of the NMBM and within a critical biodiversity area (CBAT2) as identified in the Eastern Cape Biodiversity Conservation Assessment and Plan and existing internal roads may need to be widened. The intention is to use existing internal vehicle tracks as far as possible; however the internal roads required for the project will be determined through the Scoping and EIA process.</p>

**National Environmental Management Waste Act (No. 59 of 2008)**

The project also requires a Waste Licence in terms of the National Environmental Management: Waste Act (Act No. 59 of 2008) in terms of GN R 718 published on the 3 July 2009, Category A listed activities. The issuing authority is the Provincial Department of Economic Development and Environmental Affairs, Cacadu Region and the project may not commence until such time as a waste license has been issued.

<b>GN R 718. Category A listed activities requiring a Basic Assessment</b>	
(17) The storage, treatment or processing of animal manure at	The applicant intends to purchase poultry litter with the intention of composting the litter for the production of fertiliser. It is estimated that the



a facility with a capacity to process in excess of one ton per day.	<p>facility will receive approximately 75 000m<sup>3</sup> (30 000 tons) of poultry litter annually from which they will produce approximately 25 000m<sup>3</sup> of fertiliser annually.</p> <p>It is anticipated that up to 10 000 tons of poultry litter may be stored on the site at any one time during a production cycle, with 3 production cycles proposed per year.</p>
(18) The construction of facilities for activities listed in Category A of this Schedule (not in isolation to associated activity).	<p>It is proposed that two footprints are set aside, one for the establishment of a composting facility (approximately 10 ha) and one for the processing of the fertiliser (approximately 0.5 ha), with a total development footprint of 10.5 ha (including services and internal roads). The composting component of the project requires a waste licence. Activities anticipated on site are the clearing of vegetation, and the grading of the site, as well as the construction of inter alia, internal roads, a suitable stormwater management system, and if required, a suitable site liner.</p>

**NEM: Air Quality Act (39 of 2004)**

In terms of the National Environmental Management: Air Quality Act (39 of 2004), GN 248 published in Government Gazette 33064 on the 21 March 2010, lists activities which require an Atmospheric Emissions Licence (AEL). An AEL is required in terms of Category 10: Animal Matter Processing. The licensing authority is the Nelson Mandela Bay Municipality.

Category 10: Animal Matter Processing		
Description:	Processes for the rendering cooking, drying, dehydrating, digesting, evaporating or protein concentrating of any animal matter not intended for human consumption.	The applicant intends to purchase poultry litter with the intention of composting the litter for the production of fertiliser. It is estimated that the facility will receive approximately 75 000m <sup>3</sup> (30 000 tons) of poultry litter annually from which they will produce approximately 25 000m <sup>3</sup> of fertiliser annually.
Application:	All installations handling more than 1 ton of raw material per day.	It is anticipated that the composting facility will store up to 10 000 tons of poultry litter on the site at any one time during a production cycle, with 3 production cycles proposed per year.

Section 38. (2) and (3) of the NEM: AQA prescribes the procedure for the submission of an AEL and the steps to notify and consult with affected organs of state and interested and affected parties. This procedure will be integrated into the Scoping and Environmental Assessment for the Environmental Authorisation and the Waste Licence Application.

In terms of the activities listed in the tables above a joint Scoping and Environmental Impact Assessment (S&EIR) is being undertaken for this project. The environmental assessment needs to show the responsible authorities (DEDEA and NMBM), and the project proponent, Die Boeram Venter Trust, what the consequences of their choices will be in biophysical, social and economic terms. Public Process Consultants has been appointed by Die Boeram Venter Trust as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and Environmental Assessment for the project. Public involvement forms an important component of this process, by assisting in the identification of issues and alternatives to be evaluated. The Environmental Assessment Process being implemented can be summarised as follows:

**Stage 1: Environmental Scoping**

This Scoping process is being planned and conducted in a manner that is intended to provide sufficient information to enable the authorities to reach a decision regarding the scope of issues to be addressed in the EIA, and in particular to convey the range of specialist studies that will be included as part of the Environmental Impact Reporting Phase of the EIA, as well as the approach to these specialist studies. Within this context, the objectives of this Scoping process are to:

- Identify and inform a broad range of stakeholders about the proposed development;
- Clarify the scope and nature of the proposed activities and the alternatives being considered;



- Through a process of broad-based consultation with stakeholders, conduct an open, participatory and transparent participation process and facilitate the inclusion of stakeholder issues in the decision-making process;
- Identify and document the key issues to be addressed in the forthcoming Environmental Impact Reporting Phase of the EIA.

### **Stage 2: Environmental Impact Assessment**

The purpose of this stage of the EIA is to undertake specialist investigations to address the issues identified through the Scoping Process. The specialists will build on the information that was gathered for stage 1, but will focus their studies on the area under assessment. The specialist studies will include the assessment of alternatives, identification of impacts and the determination of the significance of impacts. Specialists will, where appropriate, formulate mitigatory measures to maximise positive benefits or avoid/minimise potential negative impacts. The following specialist assessments have been identified, at this stage, to form part of the environmental assessment stage of the project:

- Air Quality Specialist Assessment - potential air quality impacts associated with the composting facility as well as the fertiliser processing plant
- Ecological Specialist Assessment - vegetation and wetlands
- Stormwater Management for the composting facility
- Engineering input for bulk services (sanitation, electricity and water) for the fertiliser plant
- Geohydrological study - borehole yield
- Geological overview of the site in order to determine substrate permeability and aquifer vulnerability
- Heritage Assessment - Palaeontological Desktop & Archaeological Phase 1 Assessment
- Traffic – estimated trip generation, access arrangements, impact on R75 and MR470

### **PUBLIC PARTICIPATION PROCESS**

Public Participation forms an integral component of the scoping and environmental impact assessment process. The following outlines the steps in the public participation process which will be undertaken to run in parallel to stage one and two of the EIA process.

#### **Step 1: Notify Authorities of Environmental Assessment Process**

An application for Scoping and EIA has been submitted to the Provincial Department of Economic Development and Environmental Affairs (DEDEA).

#### **Step 2: Notification to I&APs and Identification of Issues (30 days)**

Step two entails providing notification to I&APs of the project as well as the identification of any issues they may have for inclusion in the Draft Scoping Report. I&APs are provided with a Background Information Document (BID) on the project, including a locality map and a comment form. I&APs are required to register their interest in the project to receive further project information. One-on-one meetings will be conducted with key stakeholders during this phase of the process. I&APs will be provided with a minimum of a 30 day period within which to raise any issues for inclusion in the Draft Scoping Report.

#### **Step 3: I&AP Review of the Draft Scoping Report (40 days)**

Issues raised by I&APs are compiled into an Issues and Responses Trail for inclusion in the Draft Scoping Report which is released for a 40 day comment period. This report will also include the Plan of Study for EIA. All registered I&APs on the project database are notified in writing of the opportunity to comment. In order to assist I&APs with their understanding of the project and to facilitate the identification of issues for inclusion in the Final Scoping Report I&APs will be provided with an executive summary of the Draft Scoping Report. Copies of the report will also be made available on the website [www.publicprocess.co.za](http://www.publicprocess.co.za). One-on-one meetings with key I&APs will be held during the review period.

#### **Step 4: Final Scoping Report**

The comments received from I&APs during the review process are considered in the compilation of the Final Scoping Report before it is submitted to DEDEA for their decision making. All I&APs on the project database will be notified in writing of the submission of the Final Scoping Report to the authorities. Any additional

comments on the Final Scoping Report are to be submitted directly to the DEDEA. The Final Scoping Report will include the Plan of Study for EIA (PSEIA) and Terms of Reference for specialist studies to be undertaken as part of the EIA process. The PSEIA is subject to the approval of the authorities.

#### **Step 5: Draft EIA Report and Draft EMPr (40 days)**

When the DEDEA accepts the Final Scoping Report and PSEIA, the environmental assessment phase may commence. The purpose of the EIA is to:

- Address issues that have been raised through the Scoping Process
- Assess reasonable and feasible alternatives that form part of the proposed activity (including No Go Option)
- Assess potential impacts
- Recommend management actions to enhance benefits or avoid/minimise negative impacts.

This stage in the process entails the compilation and release of a Draft EIA Report (including the draft EMPr) for a 40 day I&AP review period. All registered I&APs will be notified of this comment period in writing. All comments received from I&APs and authorities via meetings held or written correspondence are compiled into a Comment and Response Trail for inclusion in the Final EIA Report. The Comments and Responses Trail will indicate the nature of the comment, when and who raised the comment as well as indicate how the comment received has been considered in the Final EIA Report, in the project design or the EMPr for the project.

#### **Step 6: Final EIA Report & Draft EMPr**

The Final EIA Report, including the Comments and Responses Trail and Draft EMPr will be compiled for submission to the authorities for decision making (DEDEA and DEA). All I&APs on the project database will be notified in writing of the submission of the Final EIA Report. Any additional comments on the Final EIA Report and EMPr must be submitted directly to the DEDEA.

#### **Step 7: Notification of Environmental Authorisation and Appeal Period**

All I&APs on the project database will be notified in writing regarding the environmental authorisation for the project and the appeal period, as well as the manner of appeal.

#### **HOW CAN YOU GET INVOLVED?**

1. By registering your interest in the project with the consultant indicated below.
2. By responding to our invitation for your involvement advertised in local newspapers.
3. By mailing or faxing a comment form to the participation consultant indicated below.
4. By telephonically contacting the public participation consultant if you have a query, comment, or require further project information.
5. By reviewing the various reports within the specified comment periods.
6. By attending any feedback meetings, which may be held during the review period. Should you be registered as an I&AP you will be invited to attend these meetings.

#### **WHO SHOULD YOU CONTACT?**

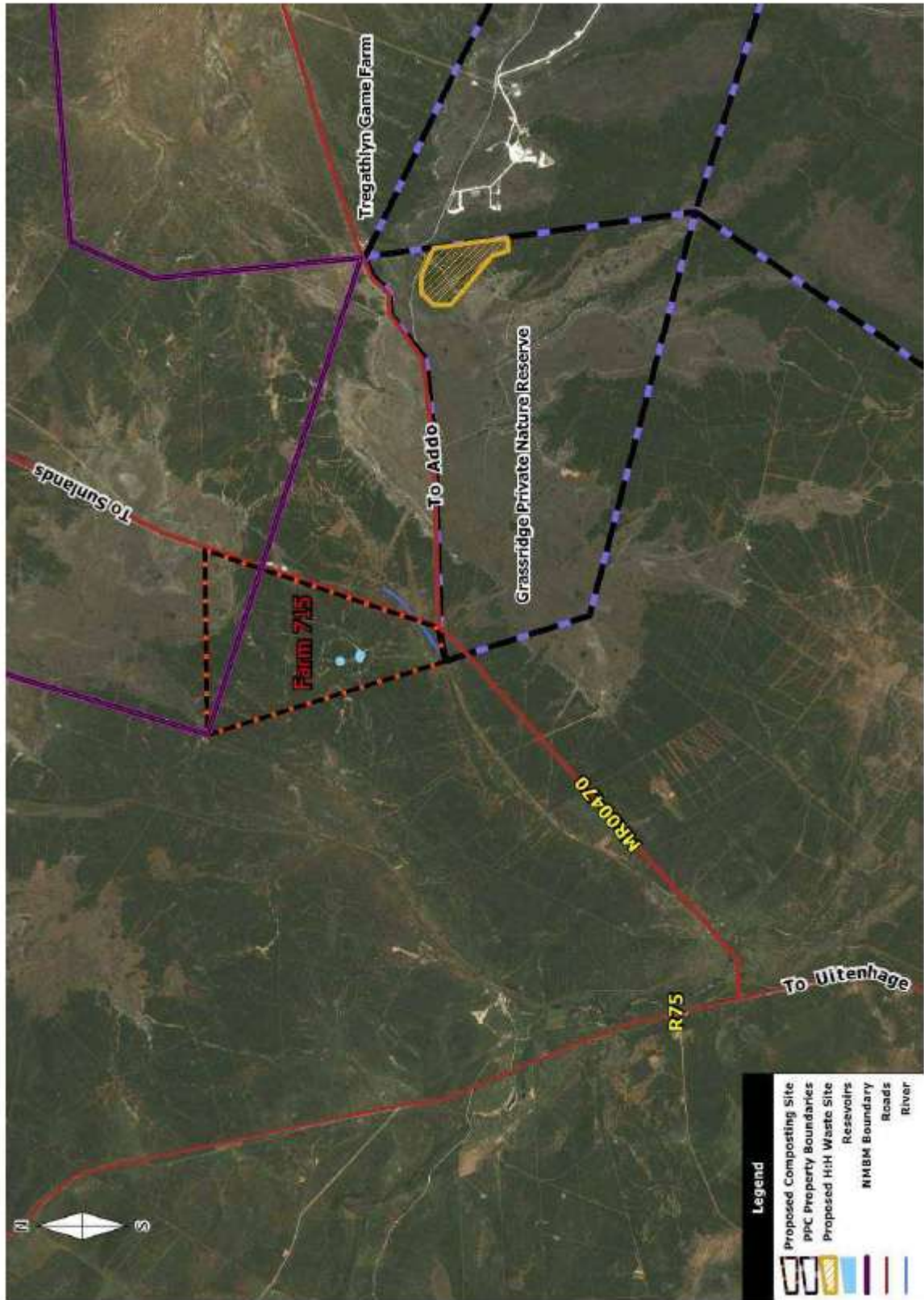
##### **Sandy Wren, Public Process Consultants**

PO Box 27688, Greenacres, 6057, Phone 041 - 374 8426, Fax 041 - 373 2002, Cell 082 4909 828

Email [sandy@publicprocess.co.za](mailto:sandy@publicprocess.co.za)

Website for information on this EIA process: [www.publicprocess.co.za](http://www.publicprocess.co.za)







## Letter 2: Notice of Release of Draft Scoping Report for Comment

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PO Box 27688 Greenacres 6057  
120 Diaz Road Adcockvale, PE 6001  
Phone 041 374 8426 Fax 041 373 2002  
Email [sandy@publicprocess.co.za](mailto:sandy@publicprocess.co.za)  
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29 March 2012

«Title» «Name» «Surname»  
«Organisation»  
«Position»  
«Adress\_1»  
«Adress\_2»  
«City»  
«Code»

Dear «Title» «Surname»



**RE: Notice of Comment Period, Draft Scoping Report for the Scoping and Environmental Impact Assessment for the Proposed Composting and Fertiliser Processing Plant (Venter Fert) on Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality.**

**DEDEAT Environmental Application Reference Number: ECm1/LN2/M/12-02**

**DEDEAT Waste Licence Application Reference Number: CA/A/17,18/001-12**

As a registered interested and affected party on the database for the above project you are hereby notified of the release of the Draft Scoping Report for a **45 day comment period** from the **30 March 2012 to 14 May 2012**.

### Project Update

Our previous correspondence to interested and affected parties is dated the 6 June 2011 and entailed notification of the commencement of the Scoping and EIA process. Subsequent to the submission of the application for Environmental Authorisation, the National Department of Environmental Affairs has confirmed that this project does not require an atmospheric emissions licence (AEL) from the NMBM. The project is however still subject to the National Environmental Management Air Quality Act (NEMA:QA), section 35. (1) and (2) regarding the control of offensive odours. It is further important to note that in terms of NEMA EIA Regulations, 2010, section 20. (3) in GN R543, full Scoping and EIA is being applied to this project.

### Availability of Information

In order to assist you with the submission of any comments you may have on the report we have enclosed with this correspondence an Executive Summary of the Draft Scoping Report as well as a comment form. The Draft Scoping Report can be downloaded from the website [www.publicprocess.co.za](http://www.publicprocess.co.za) Chapter Four of the Draft Scoping Report includes an Issues and Response Trail, outlining the issues raised by I&APs to date in the process.

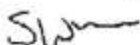
### Next Step in the Process

The comments made by interested and affected parties (I&APs) will be considered in the finalisation of the Scoping Report before submission to the Provincial DEDEAT for their decision making. Input received from I&APs forms an important part of the Scoping Process and assists in determining the scope and terms of reference for specialist studies to be undertaken in the EIA phase of the Assessment. Chapter 6 of the Draft Scoping Report provides an outline of the specialists proposed to form part of the EIA phase of the Assessment process.

You are required to submit any comments that you may have on the Draft Scoping Report by the **14 May 2012**, to the Environmental Assessment Practitioner, contact details above. As a registered I&AP on the project database you will be notified in writing of further opportunities for comment.

Should you have any comments or queries please do not hesitate to contact Sandy Wren or Paul Steyn at the contact details above. We look forward to your participation in this stage of the process.

Yours sincerely

  
**SANDY WREN**

## Comment Form

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**DRAFT SCOPING REPORT  
COMMENT FORM**

**Scoping and Environmental Impact Assessment**

**Applicant:** Die Boeram Venter Trust

**Project:** Proposed Venter Fert Composting and Fertiliser Processing Plant

**Location:** Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality.

**Primary Listed Activity:** NEM: Waste Act (No. 59 of 2008): GN R 718, Category A. (17.)

**Return Completed Reply Form to:**

*Public Process Consultants, PO Box 27688, Greenacres 6057  
Phone: 041 – 374 8426 or Fax 041-373 2002 or Email sandy@publicprocess.co.za*

**Complete all Relevant Sections Below and Return By: 14 May 2012**

Please provide your full contact details:

FIRST NAME:	SURNAME:
ORGANISATION:	TITLE:
POSTAL ADDRESS:	
CODE:	
PHONE:	FAX:
CELL:	EMAIL:

**Please clearly outline comments you may have in response to the Draft Scoping Report (use additional pages if needed)**

*Registration and comments form*

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## Executive Summary of the Draft Scoping Report

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## **EXECUTIVE SUMMARY**

### **INTRODUCTION**

Die Boeram Venter Trust (project applicant) intends to establish and operate a composting and fertiliser processing plant on Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality. The farm, approximately 377 hectares in extent, is currently zoned for agriculture use and falls outside of the urban edge of the Nelson Mandela Bay Municipality (NMBM). The applicant proposes to compost poultry litter (manure) to produce fertiliser.

An application for Environmental Authorisation and a Waste Licence Application have been submitted to the Provincial Department of Economic Development, Environmental Affairs and Tourism (DEDEAT) and reference number ECm1/LN2/M/12-02 has been assigned to the environmental authorisation and reference number CA/A/17,18/001-12 has been assigned to the waste licence application. The applicant has appointed Public Process Consultants as the independent Environmental Assessment Practitioner to manage the Scoping and EIA process for this project. The environmental assessment needs to show the responsible authorities, and the applicant, Die Boeram Venter Trust, what the consequences of their choices would be in biophysical, social and economic terms.

### **PROJECT NEED AND JUSTIFICATION**

The national gross income from poultry meat for the period 2009 (as recorded by the Department of Agriculture, Fisheries and Forestry [DAFF]) was R23,165 billion and from poultry eggs it was R6,986 billion. Combined, the national gross poultry farm income for 2009 was R30,151 billion. Poultry producers are the largest part of South African agricultural GDP at 24% of all agricultural production in comparison with 20% in 2008. This equates to 48% of all animal products produced in South Africa (in Rand terms) in comparison with 44% in 2008. Based on the above the poultry industry is an important and growing sector of SA's agricultural industry.

The Nelson Mandela Bay Municipality includes numerous commercial poultry facilities engaged in either broiler or egg production on a range of scales; as well as a variety of poultry rearing and keeping facilities which support these operations (e.g. layer facilities, breeder facilities). During the course of rearing / production substantial amounts of poultry litter which accumulates in the enclosures requires regular removal as a fundamental component of the poultry production process. Due to the high residual nutrient content of the poultry litter, it is considered to be a valuable source of fertilizer for the agricultural industry. Composted manure is known to be a more effective fertiliser when compared with untreated manure (Brown *et al.* 2008). There is currently no such facility in the Nelson Mandela Bay or surrounding area. The applicant intends to provide such a facility for the composting of poultry litter to produce fertiliser.

### **Site Suitability**

The proposed site (Farm 715) was selected based on the following criteria; distance to source and markets, proximity to residential areas, site topography, size and land availability. Farm 715 is located outside the urban edge of the NMBM (approximately 12 km), however it is still within travelling distance of the main poultry producing areas in the NMBM and SRVM. It is also in close proximity to potential markets in need of fertiliser in the Sundays River Valley Municipal area (citrus and crop producers). The site is rural in nature and is currently zoned for agricultural use. It is not located near any existing residential areas or land proposed for future zoning to residential use. Land-uses in the area include game and stock farming, calcrete mining, private nature reserves (not declared), and the proposed Regional Hazardous Waste Site. The site represents a gently sloping area where surface (storm) water runoff from the composting operation can be effectively managed. Chapter Five of the Draft Scoping Report deals with alternative sites considered as part of this assessment process.

### **IDP & SDF**

The IDP (2006 – 2011) of the NMBM relates the following with regards to extensive agriculture outside the urban edge of the NMBM:

*"Areas outside of the urban edge represent a peripheral use zone, identified by the Department of Agriculture as prime agricultural land on which extensive agriculture should be protected and promoted".*



According to the NMBM SDF (March 2009), the area under assessment falls within the Agriculture Development Zone. The NMBM Rural Land Use Management Policy, indicates that permitted uses in this zone include, inter alia, Agriculture as defined in the section 8 zoning scheme. In addition the proposed site has been given an Agricultural Land Capability classification of VI. Land in Class VI has severe limitations that make it generally unsuited for cultivation and limits its use largely to pasture and range, woodland or wildlife food and cover.

## PROJECT OVERVIEW

Farm 715 is currently zoned for agricultural use and is being used for small scale crop farming as well as rangeland (cattle and game), including associated infrastructure (farm house, dams and irrigation infrastructure, storage/maintenance sheds). The farm is currently fenced and it is proposed the project is developed in phases to provide for the following:

- Composting site (approximately 10 ha)
  - Mechanical bagging and bulk storage
- Fertiliser processing plant (approximately 2 400m<sup>2</sup>), in a phased manner
  - Phase One: Storage and collection area
  - Phase Two: Product intake and processing area
- Associated bulk infrastructure (internal roads, water, electricity, stormwater management and sanitation)

The total proposed developed area is anticipated to be approximately 10.5 ha and the development footprints (composting and fertiliser processing plant) will require a suitable zoning while the remainder of the farm is proposed to continue zoned for agriculture.

### **Composting Facility**

The applicant proposes to produce fertiliser primarily from the composting of poultry litter, using an aerobic process. It is proposed that the poultry litter is sourced from various poultry production facilities in and around the Metro from where it will be delivered directly to the site (Farm 715) via covered side-tipper trucks. The composting footprint will consist of approximately 120 rows (or windrows) of poultry litter approximately 3m wide, 1.5m high and 100m long (75 000m<sup>3</sup> or 30 000 tons of poultry litter annually), for a period of two to four months, to produce approximately 25 000m<sup>3</sup> of fertiliser annually. Gaps of approximately 2m wide are required between the rows to allow for the movement of vehicles (delivery of product, machinery for watering, mechanical compost turner, mechanical bagger and compost collector). The composting footprint is proposed to be approximately 10ha in extent.

The poultry litter delivered to the facility loses bulk due to bacterial decay of organic matter and evaporative water losses. The volume lost will vary dependent on the composition of the raw material and its moisture content. During the composting process the windrow is monitored for moisture content and temperature, as these factors influence the efficiency of the process. A mechanical compost turner will be used to turn the windrows as this becomes necessary (to inhibit anaerobic conditions and maintain optimum temperature and moisture levels). The windrows require watering in order to ensure that optimum moisture conditions are maintained. It is estimated that approximately 6000 litres (6kL) of water will be required per 100 meter row. Thus 3 cycles of 120 rows (360 rows annually), will require 2 160 000 litres (2160 kL) of water annually, or 8 300 litres of water per day. After completion of the composting cycle the compost can either be sold directly to users in bagged or bulk form; or be processed further (pelletised) before being sold.

The applicant proposes a phased approach to the bagging, bulk storage; and further processing of the fertiliser. During Phase One the applicant proposes to manually bag the composted fertiliser by means of a mobile mechanical bagger and store the bagged product in existing storage sheds on site prior to distribution to markets. The applicant also proposes to cater for the bulk storage and collection of fertiliser during Phase One, which would require the construction of the bulk storage and collection area of the fertiliser processing plant.

### **Fertiliser Plant**

The product intake and processing section of the fertiliser processing plant is required predominantly to produce pelletised fertiliser. Based on growth in demand for pelletised fertiliser the applicant intends to construct the fertiliser processing plant in phases. Depending on market demand it is anticipated the completion of the construction of the fertiliser processing plant will be within five years of the

establishment of the composting component of the proposed project. Upon completion, the facility will be an enclosed roofed structure with a footprint of approximately 2 400m<sup>2</sup> and 20 m high. The fertiliser processing plant can be divided into the following areas: product intake area, processing area, storage and collection area; and services and offices (boiler, electricity, compressed air, work shed)

### **Bulk Services**

Water will be required for the watering of the windrows and in the fertiliser plant (steam generation and domestic consumption). The total demand for the composting facility and fertiliser plant is estimated to be 10 900 litres per day. Subject to the outcome of the testing of the yield of existing borehole/s on the farm, it is proposed that underground water is used as a primary source of water. The water requirements will be supplemented with rainwater harvesting and recycling of rainwater runoff through a two-phased semi-dry detention pond system.

There is an existing 3 phase 50 kva line on the farm which is proposed to be used as a source of electricity. As far as possible existing vehicles tracks on the site will be used as internal roads. The Traffic Impact Assessment will assess and make recommendations with regards to roads affected by the project.

Additional sanitation services in the form of a water-tight conservancy tank system will be required for the office component of the fertiliser processing plant. Sufficient capacity is required for 5 employees; a conservancy tank of approximately 11.38 m<sup>3</sup> will be required.

In order to manage stormwater runoff from the site, it is proposed that a "v" drain is created at the base of the footprint of the composting area, into which runoff water will eventuate. This water will be diverted into a two-phased semi-dry detention pond system. Subject to further specialist investigation the stormwater detention system will consist of a primary and a secondary treatment system with an outlet into a collector system, where the water will be regularly tested and treated if required. It is proposed the runoff water is used as a secondary source of water for the watering of the rows of compost.

### **SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT PROCESS**

In terms of the National Environmental Management Act (Act no 107 of 1998), as amended (NEMAA), and the NEMA EIA Regulations 2010 published in Government Notice R 543, 544, 545 and 546 on the 18 June 2010 in Government Gazette 33306 (as amended), the project requires a Basic Assessment in order to obtain Environmental Authorisation and a Waste Licence, prior to commencement of activities on site.

- The project requires Environmental Authorisation from the Provincial Department of Economic Development Environmental Affairs and Tourism (DEDEAT) in terms of the National Environmental Management Act (Act No. 107 of 1998) as amended ("NEMAA") and the NEMA EIA regulations 2010 (as amended) for activities listed in GN R 544 and 546.
- The project also requires a Waste License in terms of the National Environmental Management Waste Act (NEM:WA), Act 59 of 2008, for Category A listed Activities in GN R718 which is also issued by the Provincial DEDEAT.

The application to commence the Scoping and EIA process in terms of the NEMA EIA Regulations 2010 was prepared and submitted to the DEDEAT, dated the **27 May 2011**. The acknowledgement of receipt of the application was not issued within the prescribed period, due to the need to obtain confirmation regarding the application and interpretation of Category 10: Animal Matter Processing, listed in terms of NEM:AQA. In accordance with Regulation 20 (3) in GN R543 of the NEMA EIA Regulations, 2010 a recommendation was submitted to DEDEAT on the **13 December 2011**, to adopt a precautionary approach towards the assessment process and, regardless of whether an AEL would be required by the project, to apply Scoping and EIA, instead of a Basic Assessment. Acknowledgement of the application submitted and confirmation of the approach to the assessment process, was received from DEDEAT in correspondence dated the **10 February 2012** and reference number **ECm1/LN2/M/12-02** has been assigned to the application for environmental authorisation. An application for a waste licence was submitted to DEDEAT, dated **3 June 2011**, acknowledgement of receipt was received on the **10 February 2012** and reference number **CA/A/17,18/001-12** has been assigned to the waste licence application.

Chapter Four of the Draft Scoping Report provides an overview of the listed activities that are triggered by the project proposal.

### SCOPING AND IDENTIFICATION OF ISSUES

The purpose of the Scoping Phase of the EIA is to identify issues which would require assessment during the EIA process, to inform stakeholders about the proposed development, and to present an opportunity for public participation to occur at an early stage, allowing for a transparent and inclusive process. It is intended that the outcome of the Scoping Phase would provide sufficient information to enable the authorities to reach a decision regarding the scope of issues to be addressed in the EIA process. Within this context, the objectives of this Scoping process are to:

- Identify and inform a broad range of stakeholders about the proposed development;
- Clarify the scope and nature of the proposed activities and the alternatives being considered;
- Conduct an open, participatory and transparent approach and facilitate the inclusion of stakeholder issues in the decision-making process;
- Identify and document the key issues to be addressed in the forthcoming Environmental Impact Reporting Phase of the EIA, through a process of broad-based consultation with stakeholders;
- Ensure due consideration of alternative options with regard to the proposed development, including the "No development" option.

The Draft Scoping Report is being made available to all stakeholders for a 40 day review period. The Final Scoping Report will include all the comments received. Chapter 6 of the Draft Scoping Report provides the Plan of Study for EIA and the Terms of Reference for the specialist studies, which have been informed by the issues identified through the Scoping Process to date. The following provides an overview of the proposed specialist studies to be undertaken during the EIA Phase of the Assessment:

- Biophysical site assessment (vegetation and fauna) to include:
  - Mapping of sensitive features and assigning appropriate no development buffers
  - Identification and verification of Critical Biodiversity Areas on the site
  - Potential project related impacts on natural vegetation and faunal habitat need to be considered
- Wetland specialist assessment
  - The occurrence, locality and importance of wetlands on the site
- Heritage specialist Assessment
  - A desktop Paleontology and a phase 1 Archaeological Impact Assessment
- Air quality specialist assessment
  - A specialist Air quality assessment will need to determine the air quality impacts of the composting process and fertiliser plant
- Geohydrological assessment
  - To establish suitable placement of the composting site relating to soil infiltration and groundwater contamination
  - Assessment of the borehole yield
- Stormwater Management Plan
  - Provision of stormwater infrastructure to manage and treat stormwater runoff from the composting facility and fertiliser plant
- Traffic Impact Assessment
  - To determine the impacts of the development-related traffic on the condition of the roads in the vicinity
- Bulk Services
  - To determine water requirements, stormwater management, electricity, sanitation and internal roads
- Materials Handling and Waste Management
  - Identify and make recommendations for waste streams
- Visual Impact Assessment
  - To identify and assess sensitive visual receptors