

**REFERENCE:** 19/2/5/3/A2/19/WL0121/21

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**COMMENT ON THE PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION E1, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROX 130M EAST OF LINK ROAD, MANENBERG & GUGULETHU**

Dear Madam

1. The above-mentioned document, as received by the Department of Environmental Affairs and Development Planning Directorate: Waste Management (the 'Department') on 26 August 2021, refers.
2. The Department has reviewed the documentation and wish to make the following comments:
  - 2.1. The proposed development is close to waterbodies and the use of waste trapping as mitigation is noted, but avoidance should be considered alongside this. It must be noted that pollution often makes its way into these waterbodies when no proper waste system is accompanied by the development. Therefore, it is imperative that a waste management system be implemented and available for use during construction and operational phases.
  - 2.2. The cleared road pavement material must be properly managed. It is advised that this waste type be managed appropriately by following the waste hierarchy and includes the correct, secure fencing of the development to limit theft of these items and potential dumping of construction materials in the area. In addition, consider following the construction and demolition guideline developed by the DEA&DP to ensure that illegal

dumping prohibited.

- 2.3. Cleared vegetation waste should not be sent to landfill, but rather chipped and/or composted, either on-site or at a licensed facility. This is imperative to ensuring that the applicant / developer contributes towards the WCG's 50% diversion of organic waste from landfill by 2022 and 100% diversion by 2027.
  - 2.4. Waste management at all stages should focus on creating beneficiation opportunities for small local businesses.
3. Please contact the Directorate: Waste Management should you have any enquiries regarding these comments.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Belinda Langenhoven', with a stylized flourish at the end.

**BELINDA LANGENHOVEN**  
**DEPUTY DIRECTOR: WASTE POLICY AND MINIMISATION**  
**DATE:** 28 September 2021