DRAFT SCOPING REPORT FOR THE PROPOSED EXPANSION OF THE KHULANI ENERGY AND PLANT MAINTENANCE FACILITY, ERF 798, BLACKHEATH, CITY OF CAPE TOWN

24/07/2025	Draft Scoping Report

Compiled by
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1. DETAILS AND EXPERTISE OF THE AUTHORS

Chand's details are contained in TABLE 1 and TABLE 2.

Table 1. DETAILS OF AUTHOR 1

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EAPASA:	2019/805

Ingrid Eggert is an Environmental Assessment Practitioner and Social Facilitator. She has vast experience in the field of environmental assessment and management on small- and large-scale projects within a diverse range of industries.

Included in Ingrid's areas of expertise are Environmental Impact Assessment processes; Specific environmental permit / licence applications; Compilation of Environmental Management programmes for the construction, operational, decommissioning and closure phases of projects; Facilitation of stakeholder engagement and public participation processes; Due diligence auditing; Compliance auditing; Environmental training / education; Development and implementation of Environmental Management Systems (including ISO 14001); Strategic environmental inputs and sustainability strategies; and Peer reviews.

As required by legislation, public participation is integral to the assessments undertaken. As such, Ingrid has honed her stakeholder engagement skills in a diverse environment. Ingrid is considered to be an industry expert.

Table 2. DETAILS OF AUTHOR 2

Author 2	Chand Consultants
Contact Person:	Ms. Michelle Lee

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EAPASA:	2021/4150 (Candidate EAP)

Michelle Lee is a candidate Environmental Assessment Practitioner (EAP) at Chand Environmental Consultants. She has a BSc degree in Biological Sciences, majoring in Applied biology (distinction), Evolution and Ecology and Marine Biology (distinction) from the University of Cape Town and BSc (Hons) degree in Marine Science from the University of Cape Town. Additionally, Michelle is currently completing a MSc degree, focusing on Electronic Monitoring within the South African demersal fishing industry, at the University of Cape Town. Her extensive academic and research history in natural science give her key insights in the fields of ecology, biodiversity-use-and-trade, climate change and the South African resource sector. This diverse background has cultivated an integrated and holistic approach to solving resource-use challenges situated at the social, economic, environmental nexus, particularly in the South African context. She provides essential project support to senior consultants, assisting with compilation of environmental assessments, management plans, report writing and management of specialists and has led the auditing, monitoring and compliance of several developments and construction sites within the Western Cape region.

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2.4. Abbreviations

The following abbreviations may be used in this report.

CCT	City of Cape Town
DEA&DP	Department of Environmental Affairs and Development Planning
DFFE	Department of Forestry, Fisheries and the Environment
EA	Environmental Authorisation
EIA	Environmental Impact Assessment as prescribed in NEMA
EMPr	Environmental Management Program
H&S	Health and Safety
IBC	Intermediate Bulk Container
IDP	Integrated Development Plan
iPWIS	Integrated Pollutant and Waste Information System
MSDF	Municipal Spatial Development Framework
MSDS	Material Safety Data Sheets
NEMA	National Environmental Management Act (No 107 of 1998 as amended)
NEMWA	National Environmental Management: Waste Act (No 59 of 2008)
PSDF	Provincial Spatial Development Framework

3. INTRODUCTION

3.1. Background to this Report

The Scoping Report forms a critical component of the Environmental Impact Assessment (EIA) process, as mandated by the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the associated Environmental Impact Assessment (EIA) Regulations. The purpose of this report is to systematically identify and assess potential environmental and social impacts associated with the proposed development and to define the scope of studies required for the subsequent EIA phase.

This Scoping Report provides a preliminary analysis of the receiving environment, outlining the existing baseline conditions and key sensitivities associated with the site. Potential environmental impacts have been identified through a desktop study, site investigations, and initial stakeholder engagements. These findings will guide the development of the EIA phase, where detailed assessments and mitigation measures will be further developed.

The Draft Scoping Report serves as a preliminary assessment document made available for review and comment by stakeholders, including regulatory authorities, interested and affected parties (I&APs), and specialists, prior to finalization

Khulani Energy and Plant Maintenance (Pty) Ltd proposes to expand its operations to accommodate the receipt, storage, treatment, and disposal of wastewater and waste oil on-site. The proposed expansion will introduce a range of waste management services, including the collection and transport of wastewater and waste oil, as well as their treatment and disposal. Additionally, the facility will offer sludge removal, wastewater disposal, sump and drain cleaning, and 24-hour spill response services. To support these operations, the expansion will also include the installation and maintenance of machinery, such as pump services, pump installation, and welding.

3.2. Purpose of this Report

Ingrid Eggert of Chand Consultants (Chand) has been appointed by Khulani Energy and Plant Maintenance (Pty) Ltd as an independent Environmental Assessment Practitioner to compile a Scoping Report for the proposed waste expansion activities.

As per the National Environmental Management: Waste Act (Act 59 of 2008), the National Environmental Management Act (Act 107 of 1998) and the 2014 EIA Regulations, as amended, a Scoping and Environmental Impact Assessment process must be undertaken for any activity that triggers a Category B waste management activity.

The purpose of this Scoping Report is to, through a consultative process:

- Identify the relevant policies and legislation relevant to the activity;

- Assess the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
- Identify and confirm the preferred activity and technology alternative through an identification of impacts and risks and ranking process of such impacts and risks;
- Identify and confirm the preferred site, through a detailed site selection process, which includes an identification of impacts and risks inclusive of identification of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological social, economic, and cultural aspects of the environment;
- Identify the key issues to be addressed in the subsequent EIA phase;
- Agree on the level of assessment to be undertaken, including the methodology to be applied in the EIA phase, the expertise required as well as the extent of further consultation to be undertaken to fully assess the nature, significance, consequence, extent, duration and probability of the impacts and risks the activity will impose on the preferred site through the life of the activity. This will also serve to inform the location of the development footprint within the preferred site;
- Determine those environmental concerns/issues that justify further investigation, and compile the Plan of Study for EIA accordingly;
- Elicit comments from Organs of State and I&APs on the proposal for inclusion in the final SR; Ensure that the Plan of Study for EIA allows for the identification of suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored; and.
- Inform the competent authorities' decision whether to approve the scoping study and allow the commencement of the EIA phase.

The Competent Authority for the proposed activity is the Department of Forestry, Fisheries and the Environment (DFFE).

3.3. Content of the Scoping Report

Error! Reference source not found. details the method in which each of the above requirements have been addressed to fulfil the requirements of a Scoping Report, as per Appendix 2 of the EIA Regulations, as amended.

Table 3. Scoping Report Requirements, as per the EIA Regulations (as amended)

Required Information	Complied with	Relevant Section
details of— i) the EAP who prepared the report; and ii) the expertise of the EAP, including a curriculum vitae.	✓	Section 1 Appendix A

the location of the activity, including— i) the 21-digit Surveyor General code of each cadastral land parcel; i) where available, the physical address and farm name; ii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties.	✓	Section 6
a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is— i) a linear activity, a description and coordinates of the corridor in which the proposed activity or ii) activities is to be undertaken; or iii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken.	✓	Section 7 Section 9
a description of the scope of the proposed activity, including— i) all listed and specified activities triggered. ii) a description of the activities to be undertaken, including associated structures and infrastructure.	✓	Section 8 Section 9 Section 11
a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process.	✓	Section 11
a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	✓	Section 12

a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including— i) details of all the alternatives considered; ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; v) the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts— a. can be reversed; b. may cause irreplaceable loss of resources; and c. can be avoided, managed or mitigated. vi) the methodology used in identifying and ranking the nature, significance, consequences extent, duration and probability of potential environmental impacts and risks associated with the alternatives;	✓	Section 8 Section 9 Section 10 Section 13 Section 14 Section 15

vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; viii) the possible mitigation measures that could be applied and level of residual risk; ix) the outcome of the site selection matrix; x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity.		
a plan of study for undertaking the environmental impact assessment process to be undertaken, including: i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity; ii) a description of the aspects to be assessed as part of the environmental impact assessment process; iii) aspects to be assessed by specialists; aspects to be assessed by specialists; iv) a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists;	✓	Section 15

v) a description of the proposed method of assessing duration and significance; vi) an indication of the stages at which the competent authority will be consulted; vii) particulars of the public participation process that will be conducted during the environmental impact assessment process; and viii) a description of the tasks that will be undertaken as part of the environmental impact assessment process; ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.		
an undertaking under oath or affirmation by the EAP in relation to: i) the correctness of the information provided in the report; ii) the inclusion of comments and inputs from stakeholders and interested and affected parties; and iii) any information provided by the EAP to interested and affected parties and any responses by the iv) EAP to comments or inputs made by interested or affected parties.	✓	EAP Declaration
an undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and interested and affected parties on the plan of study for undertaking the environmental impact assessment.	✓	EAP Declaration

where applicable, any specific information required by the competent authority.	Not Applicable
any other matter required in terms of section 24 (4) (a) and (b) of the Act.	Not Applicable

4. ASSUMPTIONS AND LIMITATIONS

The report is based on the following assumptions:

a) The findings and observations detailed in this Scoping Report are based upon desktop investigations and visual inspections by the Environmental Assessment Practitioners (EAP), interviews and scrutiny of documents provided by the project team. The EAP cannot be held responsible for incorrect conclusions drawn as a consequence of being issued with obsolete documents or information being withheld.
b) The findings, recommendations and conclusions given in this report are based on the author's best scientific and professional knowledge.

5. ADMINISTRATIVE DETAILS

5.1. Details of the Project Applicant and Representative

Details of the applicant and landowner are noted in Table 4 and Table 5 below.

Table 4. Details of the Project Applicant

Applicant Name	Khulani Energy and Plant Maintenance (Pty) Ltd
Postal Address	14 Helene Avenue, Blackheath, City of Cape Town, 7581
Responsible Person	Mr. Lawrence Sipho Tholo
Telephone No.	0849605961
E-mail Address	lawrence@khulanienergy.co.za
Company Registration No.	2018/095524/07

Table 5. Details of Landowner

Name of Company in Control of the land	Bosman Fleet Management
Postal Address	14 Helene Avenue, Blackheath, City of Cape Town, 7581
Responsible Person	Mr. Lawrence Sipho Tholo
Telephone No.	0849605961
E-mail Address	lawrence@khulanienergy.co.za

6. PROJECT LOCALITY

The proposed expansion of the existing Khulani Waste Management facility is located on Erf 798 at 14 Helene Avenue in Blackheath, within the City of Cape Town, Western Cape. The property measures approximately 1,300.4m². It is situated.

The central coordinates of the property are 33°57'33.39"S and 18°41'37.96"E. The site falls under the jurisdiction of the City of Cape Town Municipality and is part of the greater Cape Town metropolitan area.

Please refer to **Figure 1** and **Figure 2** below for site locality maps.

Figure 1. Locality Map (created using Google Earth Pro, 2025)

Figure 2. 1km Scale Locality Map (created using Google Earth Pro, 2025)

6.1. Details of the Property

Details of the project locality and its respective property information is detailed in **Error! Reference source not found.**

Table 6. Property Information for the proposed development locality

Erf Name	Erf 798, Cape Town
Applicable Area (m^2)	1300.4m^2
21 Digit Surveyor Code	C06700020000079800000
Co-ordinates (Centre of the property)	33°57'33.39"S and 18°41'37.96"E
Physical Address	14 Helene Avenue, Blackheath, City of Cape Town, 7581
Postal Address	14 Helene Avenue, Blackheath, City of Cape Town, 7581
Town	Blackheath, City of Cape Town
Municipality	City of Cape Town
Province	Western Cape

7. EXISTING CONDITIONS AND LAND USE

The Khulani Energy waste management facility is currently engaged in the collection, storage, and transportation of industrial and commercially generated waste oil. This includes waste oil sourced from vehicle and ship engine maintenance, grease traps, and manufacturing processes. The facility operates on a small scale, with waste oil being temporarily stored in impermeable tanks for a maximum period of two weeks before being transported to accredited recycling facilities, for processing and disposal.

The facility operates two 25,000-liter tanker trucks, which are utilized for the collection of waste oil from various receiving sites and its subsequent transport to recycling facilities. At any given time, approximately 29,000 Liters of waste oil are stored on-site within impermeable containment structures to mitigate the risk of environmental contamination. For these activities, Khulani Energy is accredited by the City of Cape Town as a registered waste service provider.

Site access is controlled via a security gate along Helene Avenue. The facility comprises a designated parking area for vehicles involved in waste oil collection and offloading. Administrative functions are conducted from an office located on the southern boundary of the site. Along the western and northern boundaries, there are two roofed structures with concrete flooring, which house multiple waste storage tanks that contain wastewater and waste oil. Essential operational equipment, including generators, is also stored within these covered structures.

Please refer to **Figure 3** to **Figure 10** for site photographs of the existing facility.

Figure 3: Impermeable tanks stored on site that house wastewater for storage prior to transport offsite

Figure 4: Intermediate Bulk Container (IBC) tanks stored within a roofed structure on site.

Figure 5: IBC tanks stored within a roofed structure on site.

Figure 6. Empty storage tanks located on site

Figure 7. Used oil receiving storage tank located within the yard. The storage tank is bunded.

Figure 8. Stationary vehicle located within parking area to offload empty IBC.

Figure 9. Access/Security gate located off 14 Helene Avenue, Blackheath.

Figure 10:Visitors parking located off 14 Helene Avenue, Blackheath.

8. PROJECT DESCRIPTION

Khulani Energy and Plant Maintenance (Pty) Ltd is proposing to expand its existing waste management facility to enhance its capacity for the receipt, storage, treatment, and disposal of wastewater and waste oil to expand and optimise their service offering. The facility is currently operational on a small scale and is registered under the National Norms

and Standards for the Storage of Waste, as promulgated by the National Environmental Management: Waste Act (Act 59 of 2008).

8.1. Proposed Expansion

The proposed expansion will necessitate additional infrastructure and processing capacity to accommodate increased volumes of waste material.

The expanded facility will provide the following waste management services:

- Collection and transport of wastewater and waste oil;
- Treatment and disposal of wastewater and waste oil;
- Sludge removal;
- Wastewater disposal sump and drain cleaning;
- 24-hour spill response services; and
- Installation and maintenance of machinery, including pump services, pump installation, and welding.

The waste material proposed for processing at the facility includes:

- **Waste oil** – Emanating from vehicle and ship cleaning, fat/grease traps, and manufacturing facilities (e.g., sunflower oil processing plants).
- **Wastewater** – Predominantly greywater sourced from ships docking at the local harbour, which has been previously used for cleaning, bathing, and recreational activities.
- **Petrol and diesel** – Minor quantities of petrol and diesel may be received.

It is anticipated that a maximum of approximately **184,000 Liters** of waste material will be stored on-site at any given time.

The proposed expansion of the waste management facility aims to provide wastewater and waste oil treatment processes while ensuring compliance with environmental regulations. The waste handled by the facility constitutes hazardous waste and the expansion will require a Waste Management License due to increased hazardous waste processing capacity.

8.2. Process Description

The waste management process begins with the collection and transportation of waste materials using ~25,000-liter trucks. Upon arrival at the facility, the waste solution will be offloaded into bunded storage tanks located adjacent to a designated internal central parking area. The waste treatment process will commence with 1 to 14 days of settling to allow solids to separate from liquids via gravity. The settled solid waste or 'sludge' will be removed from the tank and disposed of to a licensed disposal facility. The liquid waste material will be pumped from the storage tanks into heating tanks via above-ground pipelines, circulated through a boiler system, and then directed into a separator to extract oil, sludge, and wastewater from each other.

Thereafter, the wastewater will undergo flocculation treatment in lime tanks to remove contaminants before being transferred to dedicated treatment tanks for quality testing to ensure compliance with municipal discharge standards. Non-compliant wastewater will be diverted to designated quarantine tanks for further chemical treatment via manual chemical dosing until it meets the municipal discharge requirements, after which it will be released into the municipal sewer network. The chemicals used in this quarantine dosing stage include:

- **Sodium hydroxide** - Sodium hydroxide (NaOH), a strong alkaline compound, plays a critical role in wastewater treatment processes, particularly in pH neutralization and odour control. Its primary function is to raise the pH of acidic wastewater streams, thereby facilitating the neutralization process. Maintaining a balanced pH is essential for protecting aquatic ecosystems, ensuring regulatory compliance, and optimizing the performance of downstream biological and chemical treatment processes. Beyond pH adjustment, sodium hydroxide contributes to the control of odorous emissions. By increasing the pH, it can suppress the release of volatile acidic gases such as hydrogen sulfide (H_2S), which are responsible for foul odours commonly associated with wastewater facilities. This makes sodium hydroxide a commonly used agent not only for its effectiveness in neutralization but also for its dual benefit in mitigating environmental nuisances.
- **Sulfuric Acid** - Sulfuric acid (H_2SO_4) is widely used in water and wastewater treatment, primarily for lowering pH in alkaline effluents. It is the most commonly used acid globally due to its effectiveness and availability. In addition to pH adjustment, sulfuric acid has demonstrated strong bactericidal properties. A study published in the *Journal of Water Research* found it capable of killing over 99% of tested waterborne bacteria, making it useful for both pH control and microbial disinfection.
- **Citric Acid** - Citric acid is a weak organic acid commonly used in water treatment for its natural chelating properties. It effectively binds to metal ions, making it useful for softening water and removing limescale from boilers, evaporators, and other equipment. As a biodegradable and non-toxic substance, it offers an environmentally friendly alternative for scale control and system maintenance in both industrial and domestic settings.
- **Chlorine Dioxide -** Chlorine dioxide is a compound widely used as a disinfectant in water treatment, particularly for drinking water. It is highly effective at eliminating bacteria, viruses, and other pathogens. When applied in carefully controlled, low concentrations, it is considered safe and does not pose health risks. Similar to bleach in its disinfecting action, chlorine dioxide is valued for its potency and ability to maintain residual disinfection throughout water distribution systems.
- **Calcium Hydroxide -** Calcium hydroxide (hydrated lime) and its related compound, calcium oxide (quicklime), are commonly used in water treatment to raise the pH of raw water prior to coagulation and flocculation. By increasing alkalinity, these

substances enhance the effectiveness of coagulants such as alum or ferric sulfate, improving the removal of suspended particles and impurities during treatment.

Other chemicals that may be used within the quarantine manual dosing include:

- **Aluminum Sulfate (Alum) -** Aluminum sulfate is widely used in water purification and wastewater treatment for chemical phosphorus removal and coagulation. It causes fine suspended particles to clump together into larger aggregates (flocs), which can then be removed by sedimentation or filtration.
- **Calcium Hypochlorite -** Calcium hypochlorite is an inorganic disinfectant commonly added to water in granular or tablet form. It effectively kills harmful pathogens, making it a key agent in safeguarding public health in both drinking water and wastewater applications.
- **Polyaluminum Chloride (PAC) -** PAC is one of the most efficient coagulants used in water and wastewater treatment. It offers superior coagulation performance across a wide pH and temperature range, making it suitable for diverse treatment conditions. It is frequently preferred over traditional coagulants like alum due to its higher efficiency and lower sludge production.
- **Sodium Chloride -** Sodium chloride, or common salt, is primarily used in water softening systems. In brine solutions, it regenerates ion-exchange resins by replacing hard water minerals such as calcium and magnesium with sodium ions.
- **Potassium Chloride -** Potassium chloride is an alternative to sodium chloride in water softeners. It regenerates the resin similarly but replaces hard water ions with potassium, a nutrient that can be beneficial in small quantities in drinking water.
- **Phosphoric Acid -** Phosphoric acid (H_3PO_4), also known as orthophosphoric acid, is used in wastewater treatment to aid in the removal of pollutants. It is a non-toxic, essential mineral acid that also serves to control corrosion in water systems by forming protective phosphate films on pipe surfaces.
- **Hydrochloric Acid -** Hydrochloric acid is a strong acid used primarily to lower the pH of industrial wastewater and for cleaning purposes. It also serves as an effective emulsion breaker and scale remover, making it valuable in treatment systems handling high pH or mineral-rich effluents.

The extracted waste oil will either be sold as biofuel/burner fuel or used onsite to power the oil boiler system. Any excess oil that cannot be utilized or sold will be safely disposed of at a licensed hazardous waste management facility.

Sludge byproducts will be reintegrated into the treatment process as described above. Any sludge that cannot be further processed will be disposed of at a licensed hazardous landfill or waste treatment facility.

The estimated storage capacities will include ~30,000 Liters of waste oil and sludge and ~200,000 Liters of treated wastewater stored on-site at any given time.

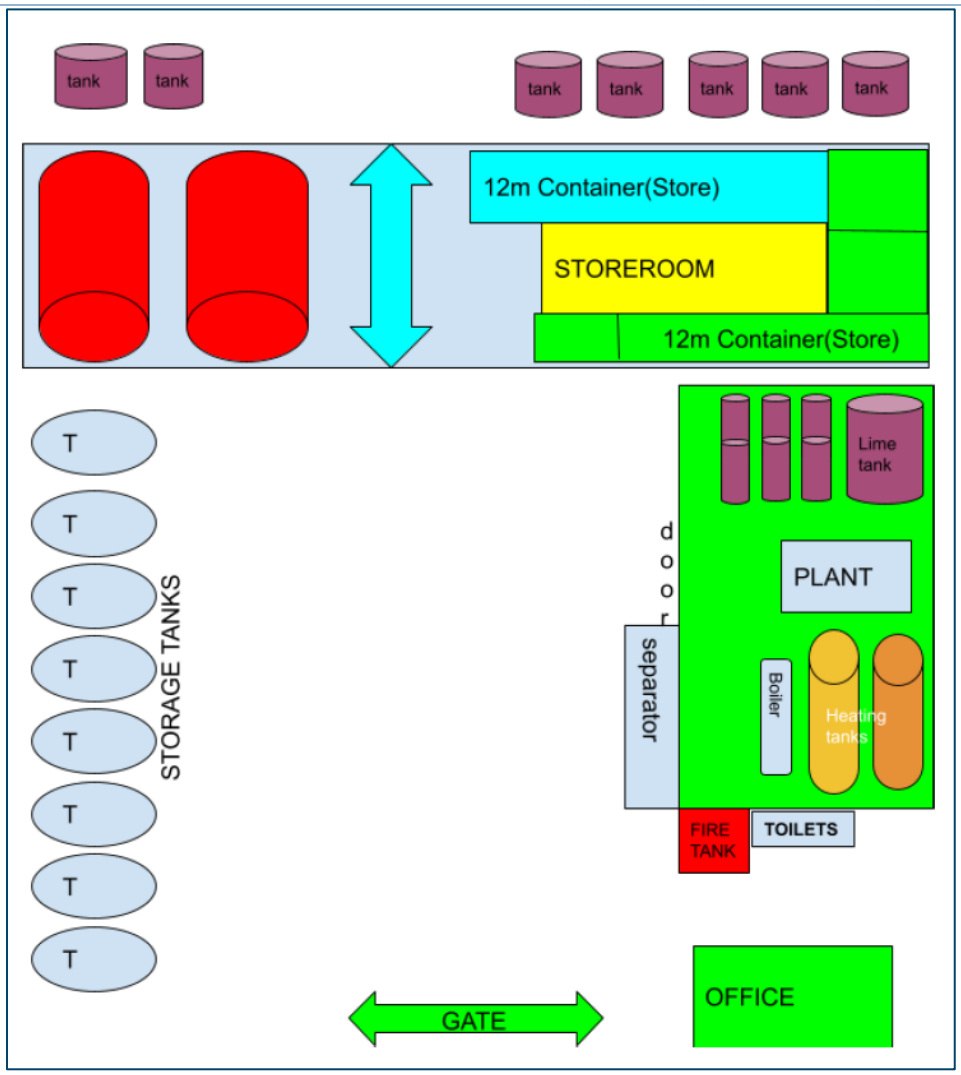


Figure 11. Layout diagram of the proposed expanded facility

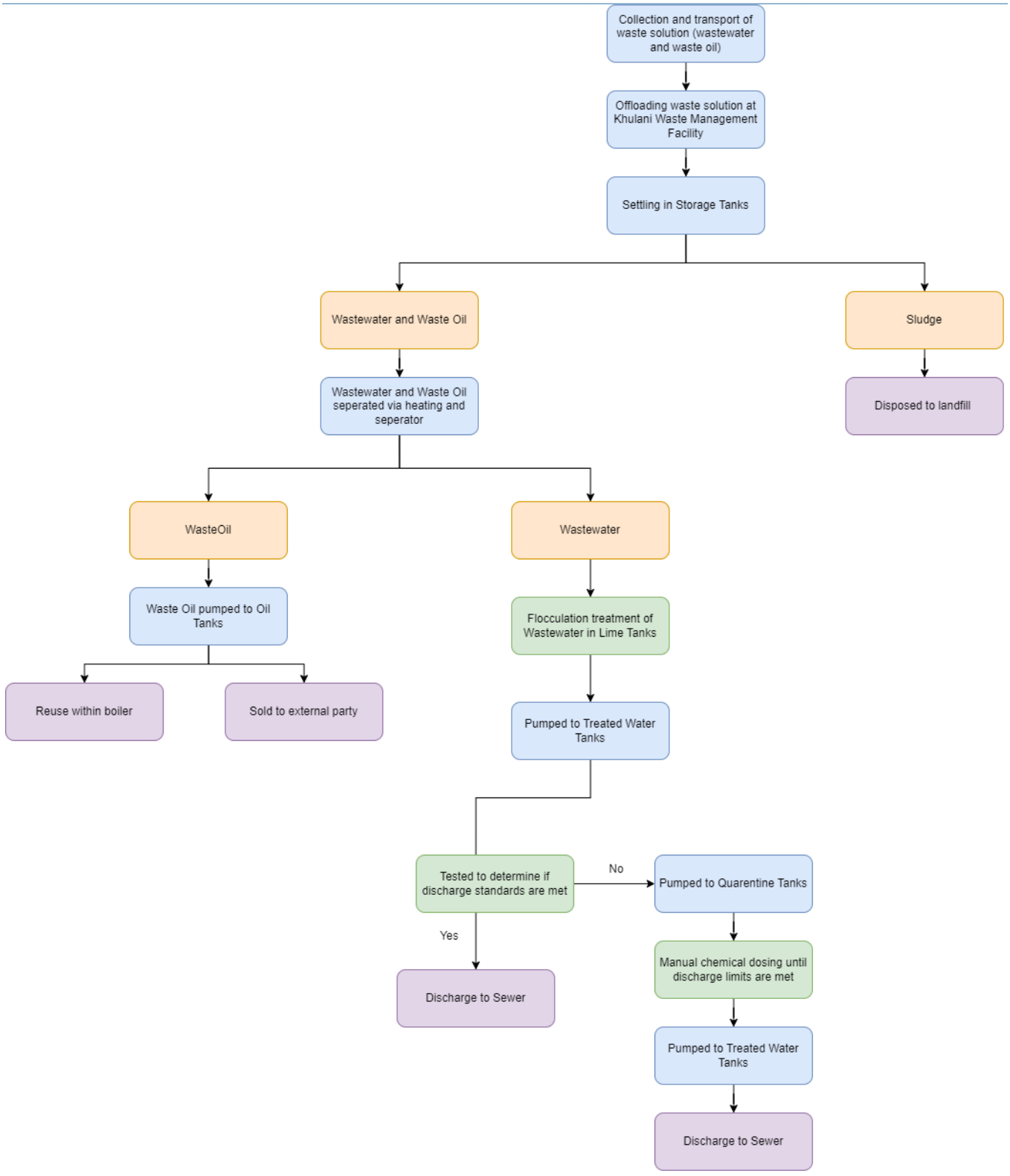


Figure 12. Process diagram of the proposed expanded facility

New structure / infrastructureThe expansion of the facility will require the construction of additional infrastructure to accommodate the increased processing capacity. This will include the construction of an impermeable concrete bund as secondary containment around the f receiving tanks and the installation of several additional storage and treatment tanks, as follows:

- eight 23kl receiving tanks,
- two 20kl heating tanks,
- four 10kl lime tanks,
- two 23kl quarantine tanks,
- five 10kl treated wastewater tanks, and
- two 10kl treated oil and sludge tanks.

Note: Flocculation is a water treatment process in which fine particles in a liquid clump together to form larger aggregates, called flocs, which can then be more easily separated from the liquid. This is typically achieved by adding chemical coagulants (such as aluminum sulfate, ferric chloride, or lime) that neutralize the electrical charges of the particles, allowing them to bind together. Flocculation is commonly used in wastewater treatment, drinking water purification, and industrial processes to improve the removal of contaminants and suspended solids.

Note: The burner will be fuelled by biofuel.

9. ALTERNATIVES

The regulations that govern EIA processes specify that alternatives must be assessed as part of the process or reasons must be provided for not assessing alternatives. This Chapter details how alternatives were considered for the application in question

9.1. Site Alternative

No alternative sites were considered for the proposed expansion, as the proposal entails the expansion of an existing operational waste management facility that is already equipped with some of the necessary infrastructure to support the handling, storage, and treatment of waste oil and wastewater. Expanding within the current site is the most practical and efficient option, as it reduces environmental disturbance compared to development of a greenfield site and leverages existing municipal service connections. Furthermore, the facility is strategically positioned to serve industrial and commercial clients, maximising waste management service potential while complying with regulatory requirements.

Relocating to an alternative site would not only be economically unfeasible but could also introduce additional environmental impacts associated with new construction and land development. Therefore, the expansion of the existing facility on Erf 798 in Blackheath represents the most viable and sustainable option.

9.2. Design Alternative

No alternative layout options have been considered, as the preferred layout has been designed to maximize the efficient use of space while meeting the operational and process requirements of the facility.

The proposed expansion has been planned to integrate seamlessly with existing infrastructure, ensuring optimal workflow, safety, and regulatory compliance. Adjustments to the layout would compromise operational efficiency, increase costs, and potentially result in additional environmental impacts. Therefore, the selected layout represents the most practical and sustainable approach to the facility's expansion.

Note: A layout plan for the proposed expansion will be included within the EIA report.

9.3. No Go Alternative

The no-go alternative refers to the option of not proceeding with the proposed expansion of the waste management facility, meaning operations would continue at their current scale without any additional service offering, infrastructure or capacity improvements.

Under this scenario, the facility would remain limited in its ability to handle increasing volumes of waste oil and wastewater, potentially leading to inefficiencies in the waste management industry and potential for environmental risks due to constrained storage

capacity in the greater Cape Town area. Additionally, no treatment of waste would occur on site which would limit the facility's earning potential and hence, economic viability.

Furthermore, the no-go alternative would forgo the potential socio-economic benefits associated with job creation, infrastructure investment, and improved waste treatment processes. While this option avoids immediate construction-related impacts, it does not support long-term sustainable waste management practices.

10. BASELINE ENVIRONMENT

A baseline description or "status quo" of the present environmental situation is provided in this section of the document. The following attributes / aspects have been described in detail, in the following respective chapters:

- Climate
- Topography
- Soil and Land Use
- Aquatic Biodiversity
- Terrestrial Biodiversity
- Visual Aspects
- Regional Socio-Economic structures

Based on the output of the Site Sensitivity Verification exercise, no specialists assessment was deemed necessary to inform this Scoping and EIA process. Additionally, confirmation of no specialist requirements was provided via online meeting with the DFFE.

10.1. Climate

Blackheath, a suburb within the City of Cape Town, South Africa, experiences a Mediterranean climate characterized by warm, dry summers and mild, wet winters. This climatic pattern is typical of the Western Cape region, where rainfall predominantly occurs during the winter months, influenced by northward-moving cold fronts. Recent studies indicate a trend towards reduced winter rainfall and increased temperatures in the area, consistent with broader observations of climate change impacts in the region (Jury, 2020).

10.2. Topography

Blackheath, a suburb within the City of Cape Town, is situated on the Cape Flats—a vast, low-lying plain characterized by its flat and gently undulating terrain. The area predominantly comprises sandy soils.

The site is relatively level and has been significantly altered and transformed by prior development activities.

10.3. Groundwater

The Cape Flats region, including Blackheath, is known for its relatively high-water table. The proposed activity does not include any abstraction activities or activities that would influence the local groundwater.

10.4. Soil and Land Use

Blackheath has undergone significant land-use transformations, particularly in the context of urban development. Historically, the area featured high-potential agricultural land, but this has since been converted for urban purposes, including industrial land. The site is surrounded by other industrial properties, within the greater Blackheath Industrial Area.

10.5. Aquatic Biodiversity

The site is situated within the Berg Water Management Area, specifically in the quaternary catchment G22E. According to available data, no watercourses or wetlands have been identified or mapped either on-site or in the close surrounding area (refer to Figure 13).

It is noted that a seep wetland has been mapped approximately 261m to the northwest of the site location, however this wetland has been infilled by local development. Additionally, the proposed expansion activities are not anticipated to have an impact on watercourses further afield due to their localized extent and significant developed buffers between the site and the mapped watercourses.

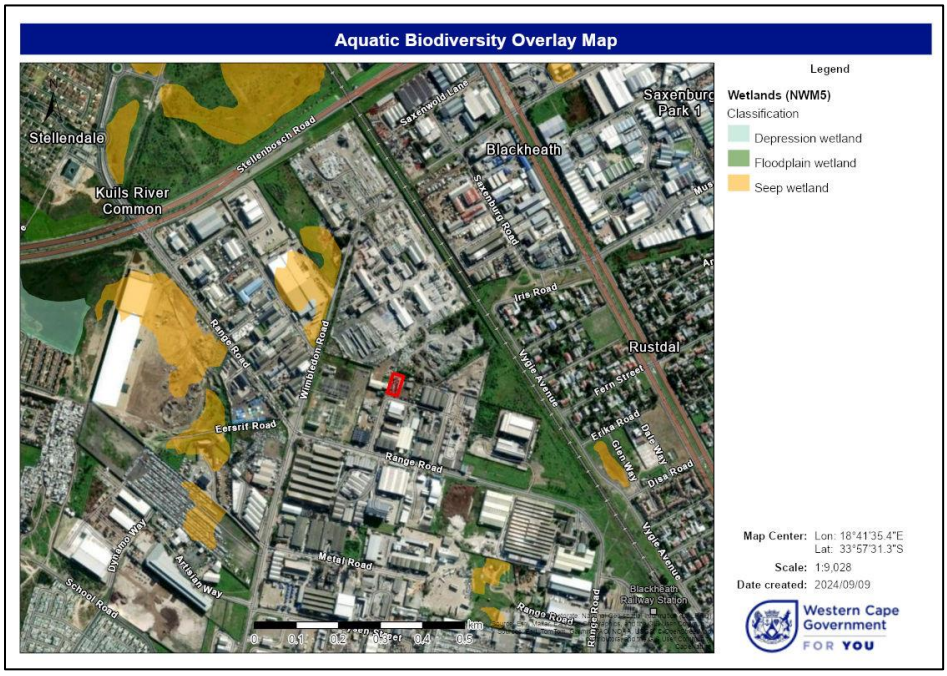


Figure 13. Aquatic biodiversity overlay map. The proposed site is delineated in red (created using Cape Farm Mapper, September 2024)

10.6. Terrestrial Biodiversity

The proposal entails the expansion of an existing facility, located in a heavily transformed urban industrial environment. There is no indigenous vegetation or groundcover present within or adjacent to the facility. No protected species or species of conservation concern remain within the site footprint.

Historically, the site would have been dominated by Cape Flats Sand Fynbos (Vegmap, 2018) (refer to **Figure 14**). This vegetation type is indigenous to the coastal area, as per the Cape Farm Mapper and South African Vegetation Map (2018). However, due to the extensive historical transformation and urbanization of the area, this vegetation no longer exists on the site and in the greater industrial area.

Additionally, there are no Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), Protected Areas, or other natural areas within the proposed site or in the surrounding areas. Given the extent of past development and transformation, no naturally occurring indigenous vegetation or functioning ecosystems remain within the site.

No fauna was observed on-site during the assessment. Additionally, the site does not contain any habitats that would support a functional community or population of wildlife. Given the heavily transformed and urbanized nature of the area, the site lacks the necessary environmental conditions to sustain a viable faunal population.

Figure 14. Historical Vegetation map with the site delineated in blue (Cape Farm Mapper, SA Vegetation Map 2018).

10.7. Visual Characteristics

The Blackheath industrial area is characterized by a heavily transformed industrial environment. The landscape is dominated by large-scale industrial buildings, warehouses,

and facilities, with minimal natural or green spaces. The area is primarily composed of hard surfaces such as asphalt, concrete, and compacted soil, which are common in urban industrial zones. Visual clutter from signage, vehicle traffic, and large storage areas contributes to a utilitarian, built-up environment.

The industrial nature of the site results in a relatively uniform visual aesthetic, with limited variation in landforms or vegetation. The surrounding area consists of other industrial developments, contributing to an overall visual impression of heavy industrial use and limited aesthetic value.

Since the proposed facility expansion is confined within the existing boundary, the change to visual characteristics of the area will be imperceptible. Given the already transformed landscape, no new or significant visual impacts are anticipated as a result of the proposed development.

10.8. Local Socio-Economic Context

Blackheath, located in the City of Cape Town, is a densely populated suburb with a population of 58 946 residents according to the 2011 Census. The gender distribution is relatively balanced, with approximately 49% of the population male and 51% female (Stats SA, 2013). The age structure is characterized by a youthful population, with ~27% under the age of 15, ~68% in the working-age group (15-64 years), and 3.3% aged 65 years and older (Stats SA, 2013). The racial composition of Blackheath is diverse, with ~82% of the population identifying as Coloured, ~15% as Black African, ~0.8% as White, and ~0.5% as Asian (Stats SA, 2013).

In terms of household characteristics, the average household size is 4.21 individuals per household, with a significant majority of residents (82%) living in formal housing and ~17% residing in informal dwellings (Stats SA, 2013). Employment figures show that ~76% of the labour force population is employed, while ~23% are unemployed. Additionally, 40% of households have a monthly income of R3 200 or less (Stats SA, 2013).

Regarding education, 39% of those aged 20 years and older have completed Grade 12 or higher (Stats SA, 2013). Access to basic services is widespread in Blackheath. 89% of households have access to piped water either inside their dwelling or in their yard (Stats SA, 2013). Furthermore, 86% of households have access to flush toilets connected to the public sewer system (Stats SA, 2013). Waste removal is efficient, with 98% of households having their refuse removed at least once a week (Stats SA, 2013). Electricity is widely used for lighting, with 99% of households having access to electricity for this purpose (Stats SA, 2013).

The total capital value of the project is estimated to be approximately ~R6,897,792.00.

It has been anticipated that ~5 new employment opportunities will be created during the expansion phase of the project, of which ~75% will be from previously disadvantages individuals.

Within the operational phase of the project, 15 permanent new employment opportunities are anticipated to be generated. It is anticipated that ~75% of this will be accrued to previously disadvantaged individuals.

11. APPLICABLE LEGISLATION AND POLICY

In South Africa, various pieces of legislation and policy frameworks govern waste management activities to ensure that such operations are conducted in an environmentally responsible manner, minimize public and environmental harm, and ensure compliance with national and international standards. This section outlines the relevant legislation and policies and discusses how they apply to the proposed expansion.

11.1. The Constitution of the Republic of South Africa, 1996

The Constitution is the supreme Law in South Africa. Chapter 2 of the Constitution contains the Bill of Rights including section 24 which provides that:

"Everyone has the right-

(a) to an environment that is not harmful to their health or well-being; and

(b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that-

(i) prevent pollution and ecological degradation;

(ii) promote conservation; and

(iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development."

Additional rights protected by the Constitution in relation to environmental authorisations include the right to administrative justice and to information, and "socio-economic rights", that include access to clean air.

The right to administrative justice is relevant to the application and awarding of environmental authorisations as decisions made by the competent authority over the course of the environmental assessment process (such as the decision to accept or reject a S&EIA Report) as well as the final decision on the application falls within the definition of "administrative action".

While no permitting or licensing requirements arise directly, this legislation paves the way for the National Environmental Management Act which is considered the overarching framework for Environmental Impact Assessments thus takes applicability there. The development phase of the project would need to take these principles into account.

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

The National Environmental Management: Waste Act (NEMA: Waste) is the cornerstone piece of legislation that governs waste management practices in South Africa. The Act provides a framework for the management of waste throughout its lifecycle, from generation to disposal. It is relevant to the Khulani facility in the following ways:

Licensing and Permits: The Waste Management License (WML) required for this expansion is a direct result of the Waste Act, which mandates that facilities handling hazardous waste obtain a license from the Department of Forestry, Fisheries and the Environment (DFFE) in respect of undertaking a Category B waste activity. The proposed increased processing capacity requires a WML to ensure that all waste is handled, stored, and disposed of according to approved standards.

CATEGORY A WASTE ACTIVITY

A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must conduct a basic assessment process set out in the Environmental Impact Assessment Regulations made under section 24(5) of the National Environmental Management Act, 1998 (Act 107 of 1998) as part of a waste management licence application contemplated in section 45 read with section 20(b) of this Act.

Recycling or recovery of waste

(5) The recovery of waste including the refining, utilisation, or co-processing of waste in excess of 10 tons but less than 100 tons of general waste per day or in excess of 500 kg but less than 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.

Treatment of waste

(7) The treatment of hazardous waste using any form of treatment at a facility that has the capacity to process in excess of 500 kg but less than 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment

CATEGORY B WASTE ACTIVITY

A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must conduct a scoping and environmental impact reporting process set out in the Environmental Impact Assessment Regulations made under section 24(5) of the National Environmental Management Act, 1998 (Act 107 of 1998) as part of a waste management licence application contemplated in section 45 read with section 20(b) of this Act.

Reuse, recycling or recovery of waste

(3) The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.

Treatment of Waste

(4) The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment.

Hazardous Waste Management: The act sets out stringent requirements for managing hazardous waste, including proper containment, treatment, and disposal. This includes the handling of waste oil and wastewater, both of which are classified as hazardous waste under the Waste Act due to their potential environmental and health impacts if not managed properly.

Waste Hierarchy: The Act promotes the waste hierarchy approach, which prioritizes waste avoidance, minimization, reuse, recycling, and disposal. The facility's waste treatment processes, including the reuse of waste oil and the treatment of wastewater, align with these principles by seeking to maximize resource recovery and minimize waste sent for final disposal.

11.3. National Environmental Management Act (Act No. 107 of 1998)

The National Environmental Management Act (NEMA) serves as an overarching framework for environmental management in South Africa. It sets the principles for decision-making that support sustainable development and outlines the procedures for environmental assessments. NEMA applies to this project in several ways:

Public Participation:

NEMA outlines the importance of public participation in projects that may impact the environment. The expansion of the facility will require consultation with relevant stakeholders, including local communities, government departments, and environmental organizations, to ensure that their concerns are addressed and that the project complies with the principles of environmental justice.

Environmental Duty of Care:

NEMA emphasizes the duty of care for environmental protection, which requires that all reasonable measures are taken to prevent pollution and environmental degradation. The Khulani facility must demonstrate that its operations will not cause harm to the surrounding environment or public health.

11.4. National Water Act (Act No. 36 of 1998)

The National Water Act is designed to manage the country's water resources and protect water quality. Given the nature of the proposed expansion, which includes the treatment and disposal of wastewater, this Act is crucial for ensuring that the facility does not negatively impact water resources.

Pollution Control:

The Act imposes strict controls on wastewater discharge, ensuring that only treated water that meets specific quality standards is released. This would be relevant for the wastewater

treatment process at the facility, particularly in ensuring that flocculation and chemical treatments comply with municipal discharge requirements.

Protection of Water Resources:

The facility's operations must not negatively impact local water resources, particularly given the use of wastewater sourced from ships and the potential contaminants in the treated effluent.

11.5. National Environmental Management: Air Quality Act (Act No. 39 of 2004)

The Air Quality Act regulates the emission of air pollutants and sets out air quality standards. The facility must consider the potential for air pollution arising from its operations, particularly from the combustion of waste oil for energy generation. The Act requires that measures be taken to minimize air pollution and meet prescribed air quality standards.

Emission Control:

If the facility uses waste oil to power its boilers or other equipment, emissions from the burning process must comply with all emissions and ambient air quality standards set by the Act and local municipality. This includes ensuring that harmful substances such as particulate matter, volatile organic compounds, and sulfur dioxide are kept within acceptable limits.

In terms of the City of Cape Town Air Quality Management By-Law (2016), application for approval for the installation of fuel burning equipment will need to be made prior to the installation and operation of the proposed boiler on site.

Dust and Odor Control:

The expansion will involve construction activities and the handling of large volumes of waste material. Measures must be taken to control dust and odors during the expansion and operational phases, in compliance with the standards set by the Air Quality Act, Dust Regulations and local municipality by-laws.

It is noted that the proposed development does not trigger any listed activities under the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEMAQA), which would require an Atmospheric Emission Licence. The proposed activity does not involve the thermal treatment of waste; rather, it employs heating solely to facilitate the separation of wastewater from waste oil based on differences in consistency. Subsequent treatment of the wastewater is conducted through flocculation within lime tanks. This has been confirmed via telecon with the CCT: Air Quality Management Department.

11.6. Occupational Health and Safety Act (Act No. 85 of 1993)

The Occupational Health and Safety Act (OHSA) aims to ensure that workers in South Africa are provided with a safe working environment. The Khulani facility must adhere to the provisions of the OHSA to safeguard its employees who will be handling hazardous materials such as waste oil and wastewater.

Workplace Safety:

The Act mandates that the facility implement safety procedures and provide protective equipment for workers exposed to hazardous substances. This includes ensuring that employees handling waste materials and operating machinery are adequately trained and protected.

Risk Assessments:

The OHSA requires regular risk assessments to identify potential hazards at the facility, including chemical spills, fires, and equipment malfunctions. The facility must implement mitigation measures, such as spill response plans and fire safety protocols, to protect both workers and the surrounding environment.

11.7. Promotion of Access to Information Act (POPIA) (Act No. 2 of 2000)

This legislation allows the public access to information about activities that influence their well-being and to make contributions to decision making. While no permitting is required, the act finds applicability during the public participation process phase of all licensing processes.

11.8. City of Cape Town Municipal By-Laws

City of Cape Town Integrated Waste Management By-law, 2009 (as amended 2016)

This by-law governs the collection, transportation, storage, and disposal of waste within Cape Town, aligning with the National Environmental Management: Waste Act (No. 59 of 2008). Given that the facility is expanding its waste storage and treatment capacity, compliance with this by-law is crucial.

- **Waste Classification & Licensing:** The facility must comply with provisions regarding waste categorization, hazardous waste handling, and necessary permits.
- **Storage & Containment Requirements:** The by-law outlines technical and operational requirements for safe waste storage, including bunded storage tanks and secure containment of hazardous substances such as waste oil, sludge, and greywater.
- **Transport Regulations:** The company must ensure that the collection and transport of waste oils, wastewater, and sludge adhere to municipal waste transportation standards to prevent spills and environmental contamination.

- **Spill Response & Emergency Measures:** The 24-hour spill response services proposed in the expansion must comply with emergency protocols outlined in the by-law to prevent groundwater contamination and land pollution.

These measures will be included within the EMPr for the development and operational aspects of the project.

City of Cape Town Stormwater Management By-law, 2005

This by-law aims to protect stormwater infrastructure and water quality by prohibiting the discharge of pollutants into the municipal stormwater system. The facility's operations involve wastewater treatment and the potential for accidental spills of oil, sludge, and chemicals.

- **Prohibited Discharges:** The facility will not discharge untreated or contaminated wastewater, oils, chemicals, or sludge into stormwater drains, natural watercourses, or public spaces.

City of Cape Town Water By-law, 2010 (as amended 2018)

This by-law regulates water use, wastewater disposal, and connections to the municipal sewer system. Since the facility proposes to treat wastewater and discharge it into the municipal sewer network, strict compliance is required.

- **Industrial Effluent Permit:** The by-law requires industries that discharge effluent (wastewater from industrial processes) into the sewer system to obtain a Industrial Effluent Discharge Permit from the City. The applicant is currently in the process of obtaining an effluent discharge permit from the City of Cape Town to enable the safe discharge of treated wastewater on site.
- **Quality Standards for Discharge:** The by-law sets water quality limits for effluent discharged into municipal wastewater systems. The facility's flocculation and chemical treatment processes will ensure compliance with these standards before wastewater is released.
- **Non-Compliance Consequences:** If wastewater does not meet the City's discharge criteria, it must be re-treated or safely disposed of at a licensed facility, ensuring no harmful substances enter the sewer system.

City of Cape Town Air Quality Management By-law, 2016

This by-law enforces air pollution control measures, particularly for industries handling hazardous materials. The waste oil treatment and sludge processing activities may generate air pollutants, including odours, and combustion emissions.

As stated above, the proposed development does not trigger any listed activities under the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEMAQA), which would require an Atmospheric Emission Licence. The proposed activity does not

involve the thermal treatment of waste; rather, it employs heating solely to facilitate the separation of wastewater from waste oil based on differences in consistency. Subsequent treatment of the wastewater is conducted through flocculation within lime tanks. This has been confirmed via telecon with the CCT: Air Quality Management Department.

- **Air Emission Regulations:** The facility must monitor and minimize air pollutants from oil heating, boiler systems, and sludge drying processes.
- **Odour Control:** The by-law includes provisions to prevent nuisance odours from industrial processes. Given the presence of waste oil and sludge, the expansion will implement measures to reduce unpleasant odours affecting nearby businesses or residential areas.
- **Boiler Emissions Compliance:** The on-site boiler system used to heat waste oil must meet municipal air quality standards.

City of Cape Town Environmental Health By-law, 2003

The by-law provides regulations for managing environmental health risks associated with industrial facilities handling hazardous waste.

- **Health & Safety Inspections:** The municipality may conduct health inspections to ensure that the facility complies with hygiene, sanitation, and hazardous substance handling regulations.
- **Worker and Community Safety:** The storage and handling of waste oils, wastewater, and hazardous chemicals must not pose health risks to employees or surrounding residents. This will be done via appropriate inductions; toolbox talks and the implementation of Personal Protective Equipment requirements. Measures to address this will be incorporated into the EMPr for the development and operation of the facility.

City of Cape Town Fire Safety By-law, 2002

Given that the facility stores and processes flammable substances (waste oil, petrol, diesel, and chemicals), fire safety compliance is essential.

Flammable liquids and oils should be stored in fire-resistant, bunded tanks to reduce fire risks. Fire-fighting equipment, such as extinguishers, and emergency response plans, must be in place prior to the expanded operations commencing. The facility's 24-hour spill response services must also include fire and hazardous materials (HAZMAT) response procedures.

The City of Cape Town will be engaged to determine the need for a Flammable Substances Permit.

11.9. Other

GUIDELINE ON NEED AND DESIRABILITY IN TERMS OF THE ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2017

The need and desirability were assessed for the proposed development is discussed in **Section 14** below in terms of the required format contained in the Guideline on Need and Desirability (2017).

EIA GUIDELINE AND INFORMATION DOCUMENT SERIES

These guidelines provide a structured framework for identifying and assessing potential environmental impacts, ensuring that all relevant legislative requirements and best practice principles are incorporated.

12. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES

The need and desirability of a proposed development is a key consideration in the Scoping and Environmental Impact Assessment (EIA) process, as outlined in the DEA Integrated Environmental Management Guideline on Need and Desirability (2017). This assessment goes beyond technical feasibility and evaluates whether a project is aligned with strategic environmental priorities, spatial development frameworks, and socio-economic objectives. It considers whether the project addresses a pressing need, supports sustainable development, and is well-situated within its environmental and socio-economic context. By assessing the necessity, benefits, and potential impacts of the proposed expansion of the Khulani Energy and Plant Maintenance (Pty) Ltd waste management facility, this section provides a rationale for the project's justification and its alignment with national, provincial, and local sustainability goals.

The following is noted:

URBAN EDGE / EDGE OF BUILT ENVIRONMENT FOR THE AREA / URBAN AREA.

The entire site falls well within a developed area and within the municipal urban edge as well as the urban area as considered in terms of NEMA.

IS THE PROPOSAL ALIGNED WITH THE EXISTING SDF AND ASSOCIATED TIMEFRAMES AND IS THE PROPOSED DEVELOPMENT IN LINE WITH THE PROJECTS AND PROGRAMMES IDENTIFIED AS PRIORITIES WITHIN THE CREDIBLE IDP?

The facility is situated within an industrial area, which is consistent with the zoning and land-use guidelines set out in the Western Cape Provincial Spatial Development Framework (2014) (PSDF) as well as the City of Cape Town Municipal Spatial Development Framework (2023) (MSDF) and the Khayelitsha Mitchells Plain Greater Blue Downs District Plan (2023) SDF. This ensures that the development adheres to the city's planning policies, promoting the efficient use of land designated for industrial purposes.

Moreover, the proposed development supports key priorities identified in the City of Cape Town Integrated Development Plan (2022-2027) (CCT IDP), particularly in relation to

sustainable waste management and economic development. The expansion of the facility addresses the city's need for increased waste management capacity, ensuring compliance with both environmental regulations and the city's commitment to sustainable urban development. The proposed project also contributes to the city's broader economic goals, particularly in terms of supporting local business growth and creating employment opportunities in the waste management and industrial sectors.

The expansion of the facility aligns with the timeframe set out in the IDP, as it contributes to addressing current challenges in waste management and anticipates the growing demand for waste disposal and recycling services. By increasing the facility's capacity, the project directly supports the long-term sustainability goals of the City of Cape Town, helping to ensure that industrial waste is managed in a responsible and environmentally sustainable manner. Therefore, the proposed expansion is consistent with both the PSDF, CCT MSDF and CCT IDP, reinforcing the city's objectives for sustainable development and economic growth.

SHOULD DEVELOPMENT, OR IF APPLICABLE, EXPANSION OF THE TOWN/AREA CONCERNED IN TERMS OF THIS LAND USE (ASSOCIATED WITH THE ACTIVITY BEING APPLIED FOR) OCCUR ON THE PROPOSED SITE AT THIS POINT IN TIME?

The expansion of the facility is appropriate and timely. The facility is located in an existing industrial zone, ensuring compatibility with surrounding land uses. The additional services offered by the expansion are complementary to the current activities at the facility. It will contribute to addressing the growing need for waste management services driven by increased industrial and other economic activities, while maintaining compliance with national and local regulations. It supports economic growth, job creation, and sustainable development, aligning with the City of Cape Town's Integrated Waste Management By-law (2009, as amended). Expanding on this site is both practical and necessary (in this location and at this time) to meet current and future waste management needs.

DOES THE COMMUNITY/AREA NEED THE PROJECT AND THE ASSOCIATED LAND USE CONCERNED (IS IT A SOCIETAL PRIORITY)?

The project is directly aligned with the growing need for proper waste management services.

The facility will create job opportunities and contribute to economic growth by supporting local industries that rely on efficient waste management services. Furthermore, the expansion aligns with the City of Cape Town's Integrated Waste Management By-law (2009, as amended) and broader sustainability goals, which prioritize responsible waste handling and reducing the environmental footprint of industrial activities.

ARE THE NECESSARY SERVICES AVAILABLE TOGETHER WITH ADEQUATE UNALLOCATED MUNICIPAL CAPACITY (AT THE TIME OF APPLICATION), OR MUST ADDITIONAL CAPACITY BE CREATED TO CATER FOR THE PROJECT?

No additional infrastructure is required to support the proposed expansion activities. Although an increase in the demand for municipal services—such as water, electricity, and sewer—is anticipated, it is expected that the existing infrastructure will be sufficient to accommodate this increased demand. Confirmation of available capacity will be sought from the City of Cape Town during the Environmental Impact Assessment (EIA) phase of the project.

IS THIS PROJECT PROVIDED FOR IN THE INFRASTRUCTURE PLANNING OF THE MUNICIPALITY AND IF NOT, WHAT WILL THE IMPLICATION BE ON THE INFRASTRUCTURE PLANNING OF THE MUNICIPALITY (PRIORITY AND PLACEMENT OF SERVICES AND OPPORTUNITY COSTS)?

The proposed project is not expected to influence the infrastructure planning of the local municipality and will be privately funded by the Applicant.

IS THIS PROJECT PART OF A NATIONAL PROGRAMME TO ADDRESS AN ISSUE OF NATIONAL CONCERN OR IMPORTANCE?

No, the project is not part of a National Programme.

DO LOCATION FACTORS FAVOUR THIS LAND USE (ASSOCIATED WITH THE DEVELOPMENT PROPOSAL AND ASSOCIATED LISTED ACTIVITY(IES) APPLIED FOR) AT THIS PLACE?

The location of the facility is highly suitable for the proposed expansion. Situated within an existing industrial zone, the site aligns with local zoning regulations, ensuring compatibility with surrounding land uses. Furthermore, the proposed additional services are complementary to the current activities undertaken on the site. Its proximity to industries that generate hazardous waste, such as wastewater and waste oil, allows for efficient waste collection and transportation. Additionally, the facility benefits from easy access to major transport routes, established infrastructure, and essential services like water, electricity, and sewerage, which will support the expanded operations.

WILL THE DEVELOPMENT PROPOSAL OR THE LAND USE ASSOCIATED WITH THE DEVELOPMENT PROPOSAL APPLIED FOR, IMPACT ON SENSITIVE NATURAL AND CULTURAL AREAS (BUILT AND RURAL/NATURAL ENVIRONMENT)?

The proposed expansion is unlikely to impact sensitive natural or cultural areas. Located within an established industrial zone, the site is not near any critical biodiversity areas, ecological support areas, protected natural areas or culturally significant sites.

As noted above, the site is situated within a significantly transformed and industrial environment, with no evidence of indigenous vegetation or habitats that could constitute a functioning ecological system.

The expansion will incorporate environmental best practices and mitigation measures to prevent soil, water, and air pollution, ensuring minimal harm to the surrounding environment. Therefore, the development is expected to have negligible impacts on sensitive natural or cultural areas.

WILL THE PROPOSED DEVELOPMENT OR THE LAND USE ASSOCIATED WITH THE PROPOSED DEVELOPMENT APPLIED FOR, RESULT IN UNACCEPTABLE OPPORTUNITY COSTS?

The proposed expansion activities are not expected to result in unacceptable opportunity costs. The project addresses a need for improved waste management capacity, provides economic benefits such as job creation, and supports local industries. Located in an established industrial zone, the development will not interfere with alternative land uses. Overall, the expansion is aligned with municipal and regional plans, offering long-term benefits that outweigh any potential costs.

WHAT WILL THE CUMULATIVE IMPACTS (POSITIVE AND NEGATIVE) OF THE PROPOSED LAND USE ASSOCIATED WITH THE DEVELOPMENT PROPOSAL AND ASSOCIATED LISTED ACTIVITY(IES) APPLIED FOR, BE?

The cumulative impacts of the proposed expansion include both positive and negative effects.

On the positive side, the expansion will significantly improve the region's waste management infrastructure by enhancing the facility's capacity to treat and manage wastewater and waste oil, thus reducing the risk of illegal dumping, alleviating pressure on landfills and promoting environmental sustainability. Additionally, the project is expected to create job opportunities, and stimulate economic growth by providing essential services to businesses generating wastewater and waste oil. The facility's operations will comply with environmental regulations, contributing to the protection of natural resources through proper waste treatment and containment measures.

The increase in waste processing capacity may result in residual waste byproducts, such as sludge, which will need to be managed carefully to prevent environmental contamination. Another potential negative impact is the risk of spills during transportation, storage, or treatment of hazardous materials, which could contribute to cumulative pollution and environmental harm if not properly managed.

IS THE DEVELOPMENT THE BEST PRACTICABLE ENVIRONMENTAL OPTION FOR THIS LAND/SITE?

Yes, the proposed expansion is the best practicable environmental option for the site. Located in an established industrial zone, the facility minimizes conflicts with sensitive areas and is well-connected to existing infrastructure. Furthermore, the proposal is complementary to the current land use on the site. The expansion will enhance waste management capacity for wastewater and waste oil, ensuring compliance with environmental

regulations and reducing environmental risks through effective containment and spill response measures. This site is the most viable and sustainable option for the project.

WHAT WILL THE BENEFITS BE TO SOCIETY IN GENERAL AND TO THE LOCAL COMMUNITIES?

The proposed expansion will offer several benefits to society and local communities.

To society in general, the expansion will contribute to better waste management practices, ensuring the safe treatment and disposal of waste materials such as wastewater and waste oil and reducing the pressure on landfill sites. This will help mitigate the environmental impacts of improper waste disposal and reduce the risk of pollution, contributing to overall environmental sustainability.

To the local communities, the expansion will provide economic benefits. The project will create job opportunities, both during construction and throughout the operational phase, contributing to local employment. It will also support local industries by providing essential waste management services to businesses that generate waste oil and wastewater.

HOW THE GENERAL OBJECTIVES OF INTEGRATED ENVIRONMENTAL MANAGEMENT AS SET OUT IN SECTION 23 OF THE NEMA HAVE BEEN TAKEN INTO ACCOUNT:

The general objectives of environmental management are to:

PROMOTE THE INTEGRATION OF THE PRINCIPLES OF ENVIRONMENTAL MANAGEMENT SET OUT IN SECTION 2 INTO THE MAKING OF ALL DECISIONS WHICH MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.

This assessment has been conducted in accordance with the National Environmental Management Act (NEMA) (Act 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations of April 2017. Additionally, the proposed development aligns with and contributes to the objectives of relevant local development plans, reinforcing its compliance with the applicable planning and regulatory frameworks.

IDENTIFY, PREDICT, AND EVALUATE THE ACTUAL AND POTENTIAL IMPACT ON THE ENVIRONMENT, SOCIO-ECONOMIC CONDITIONS AND CULTURAL HERITAGE, THE RISKS AND CONSEQUENCES AND ALTERNATIVES AND OPTIONS FOR MITIGATION OF ACTIVITIES, WITH A VIEW TO MINIMIZING NEGATIVE IMPACTS, MAXIMISING BENEFITS, AND PROMOTING COMPLIANCE WITH THE PRINCIPLES OF ENVIRONMENTAL MANAGEMENT SET OUT IN SECTION 2.

This has been undertaken and is detailed in the impact assessment section of this report, noting that the full impact assessment will only take place in the EIA phase.

ENSURE THAT THE EFFECTS OF ACTIVITIES ON THE ENVIRONMENT RECEIVE ADEQUATE CONSIDERATION BEFORE ACTIONS ARE TAKEN IN CONNECTION WITH THEM.

This has been undertaken and is detailed in the impact assessment section of this report and will be subject to authority decision-making.

ENSURE ADEQUATE AND APPROPRIATE OPPORTUNITY FOR PUBLIC PARTICIPATION IN DECISIONS THAT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.

Meaningful public engagement will be undertaken as part of this Scoping process in line with legislated requirements. Refer to **Section 16** for the detailed methodology.

ENSURE THE CONSIDERATION OF ENVIRONMENTAL ATTRIBUTES IN MANAGEMENT AND DECISION-MAKING WHICH MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.

All comments received from Interested and Affected Parties will be carefully considered, responded to and will be incorporated into the final Scoping Report. This will inform the decision-making.

IDENTIFY AND EMPLOY THE MODES OF ENVIRONMENTAL MANAGEMENT BEST SUITED TO ENSURING THAT A PARTICULAR ACTIVITY IS PURSUED IN ACCORDANCE WITH THE PRINCIPLES OF ENVIRONMENTAL MANAGEMENT SET OUT IN SECTION 2.

The proposed development and its associated activities have been investigated and assessed in relation to with the sensitivities identified in the baseline environment. The assessment also considers the direct, indirect and cumulative impact on local communities as well as the greater Metropolitan area.

Mitigation measures have been proposed to minimize any adverse impacts, while measures to enhance the potential positive effects of the development have also been identified.

Furthermore, the report informs authorities of uncertainties and assumptions to ensure that a cautious approach is adopted in decision-making.

DESCRIBE HOW THE PRINCIPLES OF ENVIRONMENTAL MANAGEMENT AS SET OUT IN SECTION 2 OF THE NEMA HAVE BEEN TAKEN INTO ACCOUNT:

The principles of environmental management, as outlined in Section 2 of the National Environmental Management Act, have been duly considered in this process. The principles most relevant to the proposed development include the following:

- The development prioritizes people and their needs, ensuring that their physical, psychological, cultural, and social interests are addressed equitably, where applicable.
- The proposed development is expected to be socially, environmentally, and economically sustainable, contingent upon the implementation of the recommended mitigation measures.

The proposed development has applied sustainable development to the following factors:

- **Environmental Protection:** Advanced waste treatment processes, including oil recovery and wastewater treatment, will reduce environmental risks, while robust containment systems will prevent contamination of local ecosystems.
- **Energy Efficiency:** Waste oil will be used to power the treatment process, minimizing energy consumption and reducing reliance on external resources.
- **Economic Sustainability:** The expansion will create local jobs during construction and operation, will contribute directly to the economy through company and income taxes, and support regional businesses by providing essential waste management services.
- **Regulatory Compliance**: The facility will adhere to environmental regulations, ensuring sustainable operation.
- **Cumulative Impact Management**: The development includes mitigation measures to minimize cumulative impacts, such as traffic and waste disposal effects, ensuring long-term sustainability.
- **Risk-averse approach**: A cautious and risk-averse approach will be applied, considering the limits of current knowledge regarding potential consequences.

CONCLUSION

The need and desirability of this project is evidenced in the extensive discussion in this section.

13. IMPACTS AND RISKS

A scoping-level identification of environmental impacts (physical, biological, social and economic) potentially associated with the proposed facility is described in this chapter. The sequence in which these issues are listed are in no order of priority or importance. The chapter identifies potential impacts and provides consideration on the relevance of the impacts to the proposed project. This identification considers both the positive and negative effects that the development may have on the surrounding environment, local communities, and broader regional context.

The purpose of this section is to provide a comprehensive understanding of the possible consequences of the proposed development and to inform the decision-making process on the Scoping Phase by proposing the approach that will be taken in the EIA phase to assess and address identified risks and propose mitigation to minimize adverse impacts.

Note: An updated detailed assessment will be undertaken as part of the EIR, in which the duration, probability, magnitude and reversibility of the impacts will be determined, and the significance of the impact calculated. Mitigation will be then determined as needed.

13.1. Preliminary evaluation of biophysical and social impacts

Development Phase	Impact	Type of Impact	Activity	Status of potential impact prior to mitigation	Indicative approach to assessment
Waste Management					
Operational	Reduced volume of waste sent to landfill and reduced environmental pollution.	Direct	**Implementation of the waste management hierarchy to obtain the most sustainable result from waste streams through alternative waste management streams, where possible**	Positive	Assessment by the EAP with consideration of Project Design within the EIR and recommendations included in the EMPr.
Operational	Contamination of the natural environment	Direct	**Legal disposal of waste to managed facility**	Positive	Assessment by the EAP with consideration of Project Design within the EIR and recommendations included in the EMPr.
Construction and Operational	Contamination of stormwater and downstream watercourses	Direct	**The risk of accidental spills during transportation, storage, or treatment of wastewater and waste oil into local stormwater system.**	Negative	Assessment by the EAP with consideration of Project Design within the EIR and waste management and spill procedure recommendations included in the EMPr.

Discharge Limits					
Operational	Potential contamination of receiving water bodies or municipal systems if treated effluent does not meet discharge standards.	Direct	**Risk of environmental pollution and non-compliance due to poor effluent quality**	Negative	Assessment by the EAP with consideration of Project Design within the EIR and recommendations included in the EMPr.
Air Quality					
Operational	Increase in odours at the facility.	Direct	**Increased odours potentially causing nuisance and discomfort for nearby communities**	Negative	Assessment by the EAP with consideration of Project Design within the EIR and odour management recommendations included in the EMPr.
Noise					
Construction and operational	Elevated noise levels impacting nearby receptors (e.g., communities, workers)	Direct	**Increase in noise levels at the facility from plant and equipment including but not limited to:** - **Vehicles** - **Boiler** - **Electric pumps** - **Generators** - **Cement mixers**	Negative	Plant design and noise controls to ensure noise levels comply with local standards or better. The EMPr will include consideration of maintenance aspects.
Social					

Construction and operational	Increased employment opportunities and enhancement of workforce skills	Direct and Cumulative	**Hiring of staff and implementation of skills development/training programs**	Positive	Assessment by the EAP with consideration of Project Design within the EIR and recommendations included in the EMPr.
Construction and operational	Economic growth through increased local business activity, employment, and secondary service demand	Direct and Cumulative	**Project-related procurement, employment, and operational expenditure during construction and operation.**	Positive	Assessment by the EAP with consideration of Project Design within the EIR and recommendations included in the EMPr.
Health					
Operational	Increased risk of health issues for workers involved in waste management	Indirect and Cumulative	**Handling and disposal of general and hazardous waste**	Negative	Assessment by the EAP of potential risks to health within the EIR and recommendations included in the EMPr.
Climate Change					
Construction and Operational	Increased carbon footprint	Direct and Cumulative	**Energy consumption, construction activities, and transportation that release GHG emissions**	Negative	Assessment by the EAP of potential risks to air quality within the EIR and recommendations included in the EMPr.

The project is not proposed for decommissioning. As such, there will be no decommissioning impacts to consider.

14. STAKEHOLDER ENGAGEMENT AND PUBLIC PARTICIPATION

Public Participation for the Scoping Phase of the project is being carried out according to Regulation 19 and 39 to 44 of the EIA Regulations, 2014 as amended. This includes:

- Identification of potential Interested and Affected Parties, including occupiers of the property, owners and occupiers of land adjacent to the site, municipal officials and relevant State Departments as part of the Public Participation Process (PPP). All respondents will be placed on the project Interested and Affected Parties (I&AP) database. The I&AP database will be used throughout the process to inform the stakeholders of the project, as required.
- A site notice advertising the proposed expansion activity and displaying the contact details of the EAP have been prepared and displayed on-site. The site notice serves the purpose of informing potential I&APs of the project and therefore afford them the opportunity to comment.
- Distribution of Notification Letters to potential I&APs via electronic mail or letter drop, notifying them on the availability of the Scoping Report on the Chand website. The Notification Letters include a brief description of the project, the locality of the reports, the EAPs contact information as well as a registration and comment sheet.
- An advert has been placed in a local newspaper to notify the public about the Scoping and Environmental Impact Assessment process and invite members of the public to register as I&APs on the project's database.
- A copy of the Draft Scoping Report is being made available for public review for a 30-day review period.
- Any comments received during the review period of the Draft Scoping Report as well as responses provided will be captured and recorded within the Comments and Response Report in the Final Scoping Report that will be submitted to the competent authority for review.

All State Departments and Organs of State indicated, will be provided notification to comment on the Scoping Report. It is hoped that they will provide comment on this report within the statutory period. If not, as per Regulation 3 (4) of the EIA Regulations, 2014 (as amended), it will be assumed that they have no comment.

These departments include the following:

- Department of Forestry, Fisheries AND Environment (DFFE): Biodiversity and Conservation
- Department of Forestry, Fisheries AND Environment (DFFE): Waste Management

- DEA&DP: Pollution Management, Sub-Directorate: Pollution and Chemicals Management
- Department of Environmental Affairs and Development Planning: Development Planning
- Department of Environmental Affairs & Development Planning: Air Quality
- Department of Environmental Affairs & Development Planning: Waste Management
- Department of Environmental Affairs and Development Planning: Biodiversity
- Local authority (i.e., City of Cape Town line departments/ note that they are also the "District Municipality" in this regard because they are a Metropol)
- Department of Water & Sanitation
- Heritage Western Cape
- Department of Transport and Public Works WCG
- Western Cape Government: DHS
- Western Cape Government: DoH
- South African National Biodiversity Institute (SANBI)
- Cape Nature
- Western Cape Government: Department of Economic Development and Tourism

On conclusion of the Public Participation Period for the Draft Scoping Report, a summary of the comments and issues raised, and responses thereto will be provided within the Final Scoping Report. Please refer to **Table 7** for a template of the information to be incorporated.

Please refer to **Appendix H** for a copy of Public Participation material distributed. This appendix will be further updated when submission of the Final Scoping Report takes place.

Table 7. Summary of the issues raised by the I&APs

Summary of issues Raised	EAPs Response to Issues	Section and Paragraph Reference in this Report Where the Issues and or Responses Were Incorporated.
To be completed upon completion of the public participation process.		

15. PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT

This Plan of Study for the EIA is submitted in accordance with the requirements set out in Appendix 2(h) of the EIA Regulations 2014 which states that a Scoping Report must include a Plan of Study for EIA which sets out the proposed approach to the environmental impact assessment of the application.

15.1. IMPACT ASSESSMENT PHASE OBJECTIVES

The main objectives of the Impact Assessment phase are to:

- Confirm the alternatives and any changes in the environment that may have taken place since the conclusion of the scoping phase.
- Assess the potential environmental (direct, indirect, and cumulative) impacts of the proposed project;
- Identify mitigation and management measures to be implemented to mitigate against negative environmental impacts, and to enhance positive environmental impacts during the project life cycle;
- Undertake further comprehensive Public Participation to provide Interested and Affected Parties (I&APs), Key Stakeholders and Organs of State with an opportunity to review and provide comments on the outcomes of the EIA process and the acceptability of the proposed mitigation and management measures;
- Develop an Environmental Management Programme (EMPr) for the proposed project; and
- Provide measures for on-going monitoring and environmental audits to ensure that the proposed project and recommended mitigation and management measures are implemented as outlined in EIA and EMPr.

15.2. ASSESSMENT OF IMPACTS

If the Scoping Report is accepted by DFFE and DEA&DP, the Impact Assessment phase will commence. Any conditions attached to the acceptance of the Scoping Report will be implemented in the EIR process. The Impact Assessment phase will involve the tasks set out below.

Specialist Studies

As indicated in this Scoping Report, there are no sensitivities on the site or surrounds, or aspects associated with the development proposal that warrants inputs from specialists. Unless otherwise determined in the remainder of the Scoping Phase, no specialist studies are deemed required within this process.

Compilation of a Draft EIR Report

A draft Environmental Impact Report will be prepared, building on the structure and content of the Scoping Report and following the requirements of Appendix 3 of the EIA Regulations, 2014. The EIR will focus on assessing and addressing potential impacts relating to the waste management activities.

The draft EIR will consider the relevant terms of conditions of the DFFE's acceptance of the Scoping Report. Stakeholder comments, concerns or issues raised during the Scoping phase will be considered and addressed in the EIR where relevant. Chapters from the Scoping Report will be updated to reflect any changes in legislation, project description, and

affected environment where relevant. Reporting on the need and desirability of the proposed activities will be reviewed and updated.

The impacts of project facility and activities during the expansion and operation phases, will be assessed by the EAP, and will be incorporated into the draft EIR together with feasible and applicant-approved mitigation measures. The impact assessment will consider the preferred project location, proposed infrastructure and layout, as well as the No-Go alternative. Iterations to the final layout and design for impact avoidance of mitigation, as informed by technical and environmental considerations identified during the impact assessment, will be detailed in the EIR.

The impact assessment will not include consideration of the project's decommissioning phase as:

- The facility is proposed to operate for > 30 years. The legislative framework and baseline environment at that time cannot be reliably predicted. Thus, it is not possible to undertake a meaningful assessment of potential impacts for the decommissioning phase at this time.
- The closure/decommissioning of facilities undertaking activities authorised in a WML is a listed activity and would require an application and assessment process at the time when closure/decommissioning is proposed.

A separate EMPr of the mitigation and monitoring measures will be prepared to meet the NEM:WA requirements, particularly those set out under Appendix 4 of the EIA Regulations, 2014.

15.3. PUBLIC PARTICIPATION

The following public participation activities will be undertaken:

- A copy of the Draft Environmental Impact Assessment Report (EIR) will be made available for public review to I&APs for a 30-day review period once available.
- Any comments received during the review period of the Draft EIR as well as responses provided will be captured and recorded within the Comments and Response Report in the Final EIAR that will be submitted to DEDEAT.
- The competent authority's decision on Waste Management License: The registered I&APs, stakeholders and organs of state will be notified of the department's decision within the specified time period.

Please refer to **Appendix H** for a copy of Public Participation material.

15.4. COMPILATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT

After closure of the draft EIR comment period, all comments, concerns, or issues received on the draft report will be incorporated and responded to in a Comments and Responses Report. Public comments relevant to informing the technical content and the assessment

of impacts will be shared with the project team to ensure issues raised are addressed in the content of the Final EIR and EMPr, where appropriate. The draft EIR will be updated to a final version, which reflects the incorporation of comments, and submitted to DFFE for decision-making on the WML.

15.5. METHODOLOGY TO BE USED IN DETERMINING AND RANKING POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS

The identification and assessment of environmental impacts is a multi-faceted process, using a combination of quantitative and qualitative descriptions and assessments. It includes applying scientific measurements (where applicable) and professional judgement to determine the significance of environmental impacts associated with the proposed project. The process involves consideration of, inter alia: the purpose and need for the project; views and concerns of I&APs; social and political norms, and general public interest.

Methodology to be applied during the EIAphase

Nature of the impact: This is an appraisal of the type of effect (positive or negative) the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected.

Extent of the impact: Extent defines the physical extent or spatial scale of the impact. The impact could:

- Site specific: limited to the site.
- Local: limited to the site and the immediate surrounding area (1-10km)
- Regional: covers an area that includes an entire geographic region or extends beyond one region to another.
- National: across national boundaries and may have national implications.

Duration of the impact: The specialist should indicate whether the lifespan of the impact would be:

- Short term: 0-5 years.
- Medium term: 5-15 years.
- Long term: beyond the operational phase, but not permanently).
- Permanent: where mitigation either by natural processes or by human intervention will not occur in such a way or in such time span that the impact can be considered transient.

Consequence of Impact: Indicate how the activity will affect the environment.

Probability of occurrence: Probability describes the likelihood of the impact occurring. The likelihood can be described as:

- Improbable/unlikely: low likelihood of the impact occurring.
- Probable: distinct possibility the impact will occur.
- Highly probable: most likely that the impact will occur.
- Definite: impact will occur regardless of any prevention measures.

Irreplaceable loss of resources: Describes the degree to which resources will be irreplaceably lost due to the proposed activity. It can be no loss of resources, marginal loss, significant loss or complete loss of resources.

Reversibility: This refers to the degree to which an impact can be reversed.

- Fully reversible: where the impact can be completely reversed.
- Partly reversible: where the impact can be partially reversed.
- Irreversible: where the impact is permanent.

Indirect impacts: Indirect impacts are secondary impacts and usually occur at a different place or time.

Cumulative impact: An effect which in itself may not be significant but may become significant if added to other existing or potential impacts that may result from activities associated with the proposed development. Cumulative impacts prior to and post mitigation must be assessed. The cumulative effect can be:

- Negligible: the impact would result in negligible to no cumulative effect.
- Low: the impact would result in insignificant cumulative effects.
- Medium: the impact would result in minor cumulative effects.
- High: the impact would result in significant cumulative effects.

Degree to which impact can be avoided: This indicates the degree to which an impact can be avoided. The degree of avoidance can either be high (impact is completely avoidable), moderate (impact is avoidable with moderate mitigation), low (the impact is difficult to avoid and will require significant mitigation measures) or unavoidable (the impact is cannot be avoided even with significant mitigation measures).

Degree to which impact can be managed: This indicates the degree to which an impact can be managed. The degree of management can either be high (impact is completely manageable), moderate (impact is manageable with moderate mitigation), low (the impact is difficult to manage and will require significant mitigation measures) or unmanageable (the impact is cannot be managed even with significant mitigation measures).

Residual impacts: Residual impacts are those impacts that remain following the implementation of mitigation measures. Residual impacts must be identified and discussed. If there are no residual impacts, the specialist will need to briefly explain that the activity will have no residual impacts.

Degree to which an impact can be mitigated: This indicates the degree to which an impact can be reduced. The degree of mitigation can either be high (the impact can be fully mitigated), moderate (the impact can be partly mitigated) or not mitigated at all.

Significance: Based on a synthesis of the information contained in the above-described procedure, the significance of the potential impacts can be assessed (prior and post mitigation) in terms of the following significance criteria:

- No impact.
- Low negative: where it would have negligible effects and would require little or no mitigation.
- Low positive: the impact will have minor positive effects.
- Medium negative: the impact will have moderate negative effects and will require moderate mitigation.
- Medium positive: the impact will have moderate positive effects.
- High negative: the impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact.
- High positive: the impact will have significant positive effects.
- Very high negative: the impact will have highly significant effects and are unlikely to be able to be mitigated adequately.
- High positive: the impact will have highly significant positive effects.

15.6. COMPILATION OF EMPr

A draft Environmental Management Programme (EMPr) will be prepared and included as an appendix to the EIA Report. The EMPr will be structured in accordance with Appendix 4 of the 2014 Environmental Impact Assessment (EIA) Regulations.

The EMPr will outline recommendations for establishing, operating and maintaining, the proposed project on the site. Its primary objective is to ensure that project activities are managed in a way that minimizes potential negative environmental impacts while maximizing positive outcomes. It will detail impact management objectives, desired outcomes, and the necessary actions, along with implementation responsibilities, schedules, and timeframes.

Additionally, the EMPr will specify monitoring requirements for environmental and waste management aspects, compliance monitoring, and reporting obligations. It will also include an environmental awareness plan for the expansion phase. If approved by the relevant authorities, the provisions of the EMPr will be legally binding on the project applicant, as well as all contractors and suppliers involved.

15.7. Description of Tasks and Indicative Timeline

A summary of the tasks that would be undertaken during the Environmental Impact Assessment phase, together with the anticipated schedule is provided in Table 8 below:

Table 8. Summary of Impact Assessment phase Tasks

EAP Activity	Opportunities for Participation		Anticipated Schedule
	Competent Authority	I&APs	
Notify I&APs of DFFE decision on Scoping Report		X	October 2025
Compile Draft EIR and EMPr	-	-	October 2025
Submission of Draft EIR to DFFE	X	-	October/November 2025
Public Participation Process	X	X	October/November 2025
Collate and respond to comments and finalize EIR	-	-	December 2025
Submit Final EIR to DFFE (within 106 days after acceptance of the scoping report)	-	-	January/February 2025
DFFE decision-making (107 days).	WML Granted/Refused	-	June 2025
Notify registered I&APs of decision (within 14 days of date of decision)	-	-	June 2025
EAP to provide information on appeal process as and when required.	Consultation during processing of appeal if relevant.	Opportunity to appeal decision in terms of National Appeal Regulations, 2014	July 2025

16. PERIOD FOR WHICH WASTE MANAGEMENT LICENSE IS REQUIRED

The intended lifespan of the expanded Khulani Waste Management Facility plant is anticipated to be unlimited. Construction activities are anticipated to occur over a period of 12 months. Therefore, the period for which the Waste Management License should be valid is indefinite.

17. REFERENCES

Jury, M.R. (2020) *Climate trends in the Cape Town area, South Africa*, *Water SA*. Available at: https://scielo.org.za/pdf/wsa/v46n3/08.pdf (Accessed: 14 January 2025).

Stats SA (2013) *2011 census suburb Blackheath, City of Cape Town – 2011 Census Suburb Blackheath J*. Available at: https://resource.capetown.gov.za/documentcentre/Documents/Maps%20and%20statistics/2011_Census_CT_Suburb_Blackheath_Profile.pdf (Accessed: 14 January 2025).

18. APPENDICES

Appendix A:	Authors CV's
Appendix B:	Locality Map
Appendix C:	Biodiversity Overlay Map
Appendix D:	Zoning Map
Appendix E:	Site Photographs
Appendix F:	Screening Tool Report
Appendix G:	Site Sensitivity Verification Report
Appendix H:	Public Participation Materials
Appendix I:	Pre-application Meeting Notes
Appendix J:	Application Form
Appendix K:	EAP Declaration
Appendix L:	Applicant Declaration

Appendix A

Authors CVs

INGRID EGGERT

CURRICULUM VITAE

BIOGRAPHY

Ingrid is an Environmental Assessment Practitioner and Social Facilitator. She has vast experience in the field of environmental assessment and management on small- and large-scale projects within a diverse range of industries.

Included in Ingrid's areas of expertise are Environmental Impact Assessment processes; Specific environmental permit / licence applications; Compilation of Environmental Management programmes for the construction, operational, decommissioning and closure phases of projects; Facilitation of stakeholder engagement and public participation processes; Due diligence auditing; Compliance auditing; Environmental training / education; Development and implementation of Environmental Management Systems (including ISO 14001); Strategic environmental inputs and sustainability strategies; and Peer reviews.

As required by legislation, public participation is integral to the assessments undertaken. As such, Ingrid has honed her stakeholder engagement skills in a diverse environment. Ingrid is considered to be an industry expert.

Key competencies include:

- Scoping and EIA assessments
- Basic assessments
- Section 24 GNEMA rectification processes
- Waste Management / Air Emissions Licence application
- Regulatory process management
- Reporting and plans
- Appointment and management of specialists
- Engagement with competent authorities
- Report writing
- Communication with Interested and Affected Parties

ACADEMIC RECORD

- Bachelor's degree specialising in Environmental Management (UNISA) 2008
- GCX Certified Carbon Footprint Analyst

YEARS OF PRACTICAL EXPERIENCE

16 years

APPLICABLE PROJECT EXPERIENCE

ENVIRONMENTAL IMPACT ASSESSMENTS

- Enkanini Informal Settlement Upgrading, Khayelitsha, Cape Town – Basic Assessment
- Greenpoint Phase 3 Low-Cost Housing Development, Khayelitsha, Cape Town – Basic Assessment
- Pelican Park Subsidized Housing Development, Cape Town - Basic Assessment and extended design engagement process with the public and beneficiaries
- The Residential and / or Mixed-Use Development on four erven in Central Kommetjie
- Schulz Vlei North: Mixed-Use development, Philippi – Basic Assessment Schulz Vlei South: Mixed-Use Development, Philippi - Basic Assessment
- Leeukoppie Residential Estate, Hout Bay – Basic Assessment
- Mile 16 Beach Estate, Yzerfontein – Part 2 Amendment Application
- Lord Charles Hotel and Conference Centre, Re-Alignment of a Stream, Somerset West – Basic Assessment
- The Boardwalk Hotel and Conference Centre, Port Elizabeth, Eastern Cape - Basic Assessment
- Wastewater Treatment Works and associated infrastructure, Bonnievale - Basic Assessment
- Waste-to-Biogas Facility, Saldanha – Basic Assessment process and Waste Management Licence Application
- Atlantis Crematorium, Atlantis – Full Scoping & EIA and Air Emission Licence Application
- Pet Crematorium, Strand - Full Scoping & EIA
- Kromvlei Dam Expansion Piketburg – Basic Assessment
- Infilling of a Wetland in Wetton, Cape Town - Basic Assessment
- Expansion of Agricultural Developments, Farm Welvaart, Ceres - Basic Assessment and Part 2 Amendment Application
- Welteverden Fuel Station - Basic Assessment
- Kuyasa Station Precinct, Khayelitsha, Cape Town - Basic Assessment
- The Development of the Kleinbron Industrial Estate, Brackenfell - Basic Assessment
- Leather Crusting (Secondary Tanning) Facility in Atlantis, Cape Town – Full Scoping & EIA and Air Emission Licence Application
- Pelts Tannery Waste Drying Beds, Port Elizabeth – Section 24G rectification process
- Development 3 Cannabis Growing and Production Facilities, Maseru, Lesotho – Three EIA processes in terms of the Lesotho environmental legislation

- Edelweiss Pharmaceuticals Waste Burial, Cape Town – Environmental Impact Report on alleged illegal waste burial with related liaison with the law enforcement branch of the DEA&DP
- Composting Operation on Farm 782, Somerset West – Section 24G rectification
- Waste dumping on Farm Hygo, Philippi – Section 24G rectification
- Demolition and Redevelopment of a house on Erf 253, Bloubergstrand – Section 24 rectification
- Conversion of Existing Structures to Tourism Accommodation, Theewaterskloof – Section 24G rectification
- Education and Community Facilities, Greyton – Combination Basic Assessment
- Sitari Fuel Service Station, Sitari – Part 1 Amendment Application
- Worcester Service Station, Worcester – Basic Assessment
- Expansion of a dam, cultivation areas and connecting pipeline on Farm Vergelegen, Eilandia, Robertson – Full Scoping & EIA
- Cultivation of virgin soil on Farm Holland, Rawsonville – Basic Assessment
- Concrete Batch Plant and Pre-cast Facility on Portion 11 of Farm Bultfontyn 128, Middelburg – Basic Assessment
- Ocean View Kommetjie Erf 5142 Road – Part 1 Amendment Application Ocean Road Extension, Kommetjie – Basic Assessment
- Plastic Waste-to-Aggregate Facility on a Portion of Erf 921, Blackheath – Waste Management Licence
- Louwville South Integrated Residential Development, Vredenburg – Full Scoping and EIA

POLICY / AUDITS / MANAGEMENT PLANS / STAKEHOLDER ENGAGEMENTS / REVIEWS

- Development of an Environmental Management Plan for a new integrated waste management facility for the V&A Waterfront, Cape Town
- Due Diligence Audits for a large agricultural corporation in Zambia (responsible for the environmental component as part of a multi-disciplinary team to support an application for international financing)
- City of Cape Town Waste Disposal and Handling Facilities – External Compliance Audits as part of a team of auditors
- Cape Town Film Studios – Construction Auditing for ongoing development on the property (2010 - 2013)
- Sun International – Joint responsibility for a Gap Analysis at all facilities in Southern Africa
- Afrifresh Farms - Joint responsibility for a Due Diligence Audit on behalf of Standard Chartered Bank
- Development of an Environmental Management Plan for a new South Operations facility for the V&A Waterfront, Cape Town
- Fusion Leather – Due Diligence Audits on a new property in Atlantis (on behalf of a financial institution)
- Wild Coast Sun – Compilation of Management Plan and Construction Auditing for a Water Park and Fuel Storage Facilities
- The Boardwalk Hotel, Port Elizabeth – Construction Auditing
- NCP Chlorchem Atlantis Depot, Atlantis – Compilation of Management Plan and Construction Auditing
- Nyungwe Forest Lodge, Rwanda – On-Site and remote Construction Auditing
- Bungalow Residence in Bakoven, Cape Town – Compilation of Management Plan and Construction Auditing and Part1 Amendment Application

- Groot Moddergat Project, Hout Bay - Compilation of an Environmental Management Plan
- Sonnenhof Retirement Village, Cape Town – Construction Auditing
- The Upgrade of Strandfontein Road (M17), Phase 1 and 2 – Construction Auditing
- Kolkies en Karee Wind Energy Facility - responsibility for the Afrikaans stakeholder engagement components
- Joint development of a Limited Environmental Management Framework for the Mossel Bay Municipality
- Joint undertaking of the Coastal Access Audit and Pilot Study for the Overberg District Municipality with Errol Cerff and Erik Botha
- Facilitation of Estuarine Management Plan workshops, Western Cape – joint facilitation
- Wasteman South Africa – joint responsibility for a Gap Analysis and Compliance Audits at all the facilities in South Africa
- De Oude Opstel and Sieraad, Robertson – Maintenance Management Plan
- Buhrein Fuel Service Station, Buhrein – Applicability Checklist
- Delft Fuel Service Station, Delft - Applicability Checklist
- Sitari Fuel Service Station, Sitari - Applicability Checklist
- Vangate Fuel Service Station, Vangate - Applicability Checklist
- Eerste River Fuel Service Station, Eerste River - Applicability Checklist
- Vrede Farm, Piketburg - Applicability Checklist
- Cape St Martins, Britannia Bay on the West Coast – Rehabilitation Management Plan
- Aan De Wijnlanden Residential Development and Associated Infrastructure – External Compliance Audit Report
- King Air Warehousing, Industrial & Mixed-Use Business Development & Associated Infrastructure – External Compliance Audit Report
- 10MW Harmony Eland, Tshepong & Nyala Solar Energy Facilities & Associated Infrastructure, Free State Province – External Compliance Audit Reports
- Expansion of the Southern Oil Canola Oil Processing Plant, Moorreesburg – External Compliance Audit Report
- Kruispad, Montagu – Applicability Checklist
- Kensington Maitland Affordable Housing – Four Applicability Checklists

Environmental Assessment Practitioners Association of South Africa

Registration No. 2019/805

Herewith certifies that

INGRID EGGERT

is registered as an

Environmental Assessment Practitioner

Registered in accordance with the prescribed criteria of Regulation 15. (1) of the Section 24H Registration Authority Regulations (Regulation No. 849, Gazette No. 40154 of 22 July 2016, of the National Environmental Management Act (NEMA), Act No. 107 of 1998, as amended).

Effective: 01 March 2025

Expires: 31 March 2026

Chairperson

Registrar

SAQA
SOUTH AFRICAN QUALIFICATIONS AUTHORITY

MICHELLE LEE
CURRICULUM VITAE

KEY QUALIFICATIONS

Michelle is an environmental and social facilitation consultant at Chand. She has a BSc degree in Biological Sciences, majoring in Applied biology (distinction), Evolution and Ecology and Marine Biology (distinction) from the University of Cape Town and BSc (Hons) degree in Marine Science from the University of Cape Town. Her extensive academic and research history in natural science give her key insights in the fields of ecology, biodiversity-use-and-trade, climate change and the South African resource sector. This diverse background has cultivated an integrated and holistic approach to solving resource-use challenges situated at the social, economic, environmental nexus, particularly in the South African context.

Michelle facilitates and compiles Basic Assessments to evaluate the environmental impact of proposed projects. Her responsibilities include preparing Environmental Management Plans (EMPr) and Construction Environmental Management Plans (CEMPs) to ensure compliance with environmental regulations during project execution. She also develops comprehensive Waste Management Plans and oversees the implementation of waste management strategies. Additionally, she facilitates the process of obtaining Waste Management Accreditation, ensuring that projects adhere to best practices and legal requirements in waste handling and disposal. Michelle also handles securing Water Use Licenses to ensure sustainable and lawful water use in projects. Her role involves coordinating Public Participation processes to engage stakeholders and incorporate their input into project planning. Her expertise in these areas contributes to sustainable development and environmental conservation. Through the above, Michelle manages the environmental aspects of various projects, including the oversight of specialists, to ensure that all environmental aspects are thoroughly addressed.

Additionally, Michelle is a highly accomplished consultant specializing in social facilitation and stakeholder engagement, with experience in public participation, community liaison, engagement with leadership structures and the organization of community events. She excels in fostering constructive dialogue among diverse stakeholder groups and mediating discussions. Michelle possesses a strong ability to build and maintain robust relationships with community leaders, political leaders, and local authorities, ensuring active participation and alignment with project objectives. She navigates socio-cultural dynamics with sensitivity, effectively engaging stakeholders through workshops, focus groups, information sessions and forums that encourage open dialogue and collaborative solution development.

Michelle demonstrates expertise in strategic communication to effectively address conflicts and manage crises. She is proficient in delivering clear and consistent messaging while actively listening to stakeholders to understand their concerns and perspectives. Michelle utilizes collaborative approaches for conflict resolution, facilitating constructive dialogue that fosters mutual understanding among parties. Michelle is committed to ensuring organizations navigate challenges effectively, preserving engagement and safeguarding their reputations.

Other key competencies include:

- Stakeholder Engagement and strategic communication;
- Crisis Management;
- Conflict Resolution;
- Group Dynamics Management;
- Networking;
- Adaptability;
- MS Office;
- Data analysis;
- Research of niche and specialized topics;
- Review and implementation of policies, legislation, guidelines, norms and standards strategies and implementation plan;
- Review and feedback of specialist input;
- Carbon footprint analysis;
- GIS mapping;
- Report writing;
- Proposal writing, budgeting and budget tracking;
- Training of staff, interns and public; and
- Presentation and Public speaking.

ACADEMIC RECORD

- BSc (Honours) in Marine Sciences (University of Cape Town, 2017)
- BSc in Biological Sciences majoring in Applied Biology, Marine Biology, Evolution and Ecology (University of Cape Town, 2016)

EXPERIENCE

- Chand Consultants (July 2021 – present): Environmental Consultant
- OLSPS Marine (November 2019 – July 2021): Technical and Research Officer
- COURSERA (March 2019 – November 2020): Online Course Curator
- WESSA (January 2018 – March 2018): Production Assistant
- NCC Environmental Services (February 2016 – March 2017): Intern

APPLICABLE ENVIRONMENTAL PROJECT EXPERIENCE

BASIC ASSESSMENTS AND SCOPING & EIAS

- **Environmental Application,** compilation of an environmental application for 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.
- **Environmental Application,** compilation of an environmental application for the Decommissioning of the Everite Asbestos Site, Erf 18354, Brackenfell.
- **Environmental Authorisation,** co-author of a Basic Assessment Report for the Proposed IRT Phase 2a Trunk Route: Portion E2
- **Environmental Authorisation,** co-author of a Basic Assessment Report for the Proposed IRT Phase 2a Trunk Route: Portion E4
- **Environmental Authorisation**, co-author of a Basic Assessment Report for the Proposed IRT Phase 2a Trunk Route: Portion W8
- **Environmental Authorisation**, co-author of a Basic Assessment Report for the Proposed IRT Phase 2a Trunk Route: Portion Wynberg Depot
- **Environmental Management Programme,** compilation of an EMPr for the Boschendal Tented Camps, Boschendal, Cape Winelands.
- **Environmental Management Programme,** compilation of an EMPr for the Boschendal Founders Estate, Boschendal, Cape Winelands.
- **Construction Environmental Management Plan,** compilation of an CEMP for the Leeukoppie Estate, Hout Bay, Cape Town
- **Construction Environmental Management Plan,** compilation of an CEMP for Erf 359, Bishops Court, Cape Town.
- **Construction Environmental Management Plan,** compilation of an CEMP for Erf 429, Clifton, Cape Town.
- **Construction Environmental Management Plan,** compilation of an CEMP for Erf 444, Clifton, Cape Town.
- **Construction Environmental Management Plan,** compilation of an CEMP for Erf 4, Clifton, Cape Town.
- **Construction Environmental Management Plan,** compilation of an CEMP for Chapel Street Road Upgrade Project, Cape Town.
- **Construction Environmental Management Plan,** compilation of an CEMP for Pioneer School Road Upgrade Project, Worcester.
- **Construction Environmental Management Plan,** compilation of an CEMP for Voortrekker Road Upgrade Project, Cape Town.

MAINTENANCE MANAGEMENT PLAN

- **Maintenance Management Plan for the Boschendal Estate** for all natural watercourses and wetlands.

ENVIRONMENTAL MONITORING AND AUDITING

- **Environmental Audit of the 12 Apostles Hotel and Spa, Camps Bay, Cape Town**. Conducting environmental compliance audit for the operational phase of the development.
- **Environmental Audit of the Cape Precious Metals Facility Montague Gardens, Cape Town.** Conducting environmental compliance audit for the operational phase of the development.
- **Environmental Audit of the Bronkhorspruit Biogas Plant, Bronkhorspruit, Gauteng** Conducting environmental compliance audit for the operational phase of the development.
- **Environmental Audit of the Cape Dairy Biogas Plant, Malmsbury, Cape Town** Conducting environmental compliance audit for the operational phase of the development.
- **Environmental Audit of the IRT Phase 2A, Work Package 3 Roadway Project, Cape Town** Conducting environmental compliance audit for the operational phase of the development.

ENVIRONMENTAL CONTROL OFFICER (ECO)

- **Environmental Control Officer (ECO), King Air Mixed Use Development, Matroosfontein** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Building works for the Courier Guy Warehouse, King Air Mixed Use Development, Matroosfontein.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Building works for the Morgan Cargo Warehouse, King Air Mixed Use Development, Matroosfontein.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Building works for the Truworths Warehouse, King Air Mixed Use Development, Matroosfontein.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Building works for the GetWorth Warehouse at Richmond Park.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Building works for the Takealot Phase 1 Facility at Richmond Park.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Building works for the Takealot DC Phase 1 and Phase 2 Facility at Richmond Park.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Building works for the Rubicon Facility at Richmond Park.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Kommetjie Central Development, Kommetjie, Cape Town.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Boschendal Estate – Extension of existing Kropman Cottages for residential use on Farm 1685/11 (FE 11), Franschhoek, Cape Town.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Sawmill Packhouse – The development of a packing shed on Portion 3 of Farm 1615 in Wemmershoek, Paarl.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), New Retreat development, Boschendal, Cape Winelands.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), IRT Phase 2A, Work Package 4, Goven Mbeki Road construction project, Cape Town.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Cape Town Stadium Road Upgrades Project, Cape Town.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Management Programme.
- **Environmental Control Officer (ECO), Seaforth Beach Upgrade, Simonstown, Cape Town**. ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Specification.
- **Environmental Control Officer (ECO), Kommetjie Road Upgrade, Kommetjie, Cape Town.** ECO for the monitoring, auditing and reporting of construction activities in accordance with the Environmental Specification.

EIA APPLICABILITY CHECKLISTS & AMENDMENT APPLICATIONS

- **EIA Applicability Checklist,** co-authored with the EIA checklist for the Proposed Oude Moulen Mixed-Use Development, Cape Town.
- **EIA Applicability Checklist,** co-authored with the EIA checklist for the for the Island Rock Mixed-Use Development, Cape Town.
- **EIA Applicability Checklist,** for Mr. John Hoal on the redevelopment of RE/12/222 to a lifestyle residential facility.
- **EIA Applicability Checklist** for the Tygerberg Hospital Urban Design Framework.
- **EIA Applicability Checklist** for the Nelson Mandela School for Public Governance.

- **EIA Applicability Checklist** for Clifton 4 development.
- **EIA Applicability Checklist** for the Premier Mills Blue Ribbon Facility.
- **EIA Applicability Checklist** for the Thembokwezi Informal Trading Area. .
- **EIA Applicability Checklist** for the Seaforth Informal Trading Area.
- **EIA Applicability Checklist** for the Strand Informal Trading Area.

ENVIRONMENTAL REPORTING

- **Environmental and Sustainability Report** for Vangate Mall, Cape Town.

WASTE MANAGEMENT

- **Waste Management License** application for the decommissioning of the Everite Asbestos Site, Erf 18354, Brackenfell
- **Integrated Waste Management Plan** for building works for the proposed residential apartment block at Steenberg, Western Cape
- **Integrated Waste Management Plan** for building works for the proposed Experiential Education Garden Development in the Green Point Park
- **Application to be an accredited waste service provider and Integrated Waste Management Plan** for Martin & East Pty Ltd.
- **Integrated Waste Management Plan** for building and operational works for the proposed Masiphumelele Phase 1 Informal Trading Zone, Cape Town.
- **Integrated Waste Management Plan** for building and operational works for the proposed GrandWest Hotel Expansion Project, Cape Town.
- **Application to be an accredited waste service provider and Integrated Waste Management Plan** for Construction Resource Development College (Pty) Ltd, Blackheath, Cape Town.

WATER USE LICENSES

- **Water Use License** for the infilling of wetlands and altering of a banks for 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.
- **Water Use License** for the infilling of wetlands at the proposed Pelican Park Phase 2 Development, City of Cape Town.
- **Water Use License** for the groundwater abstraction at Makhado Crossing Shopping Centre, Makhado, Gauteng.
- **Water Use License** for the Development of the Wireless 2 Residential Development on Portions of Remainder Farm 1529, Kommetjie, Cape Town.
- **Water Use License** for the Development of Residential Units on Portion of Remainder Farm 948, Wireless Road, Kommetjie, Cape Town.
- **Water Use License** for the Abstraction of groundwater at 12 Apostles Hotel, Cape Town.
- **Water Use License** for the Groundwater abstraction via borehole at Helderberg Centre.
- **Water Use License** for the Construction of a retail centre building and associated infrastructure within 500m of a wetland, Cape Town.
- **Water Use License** for the Groundwater abstraction at Park Inn by Radisson Hotel, Newlands, Cape Town.
- **Water Use License** for the Agterdam Cottages - Refurbishment and Expansion for tourist accommodation, Cape Town.
- **Water Use License** for the Groundwater abstraction at Cradlestone Mall in Krugersdorp, Mogale City.
- **Water Use License** for the Groundwater Abstraction via Boreholes at King Air Industria, Cape Town.
- **Water Use License** for the Groundwater abstraction at Paul Roos Gymnasium, Erf 16502, Stellenbosch.
- **Water Use License** for the Proposed Groundwater Abstraction at Richmond Park, Cape Town.
- **Water Use License** for the Groundwater abstraction at Stellenbosch Square, Stellenbosch.
- **Water Use License** for Wynberg Depot, Cape Town.
- **Water Use License** for IRT Phase 2A Trunk E3, Cape Town.
- **Water Use License** for IRT Phase 2A Trunk E2, Cape Town.
- **Water Use License** for IRT Phase 2A Trunk E4, Cape Town.

- **Water Use License** for the proposed farm worker "chill zones", Boschendal, Western Cape.
- **Water Use License** for the proposed Boschendal Founders Estates, Pniel, Western Cape

PUBLIC PARTICIPATION

- **Independent Public Participation Process** for the Proposed memorial on Erf 95135, Delville Wood Memorial Garden in the Cape Town Company's Garden.
- **Independent Public Participation Process** for 2 Liesbeeck Avenue development, Cape Town.
- **Independent Public Participation Process** for the feasibility study conducted for the pre-development of St Pauls Bree street Cape Town property - Erven 3122 and 3123

APPLICABLE SOCIAL FACILITATION EXPERIENCE

- **Integrated Rapid Transport Phase 2A: Social Facilitation services for Work Package W1 within the City of Cape Town:** Public Information Days, Community Engagement and Liaison, Community leader engagement, Political leader engagement, micro profiling, liaison with directly affected stakeholders, strategic communications.
- **Integrated Rapid Transport Phase 2A: Social Facilitation services for Work Package W2 within the City of Cape Town:** Public Information Days, Community Engagement and Liaison, micro profiling, Community leader engagement, Political leader engagement, liaison with directly affected stakeholders, strategic communications.
- **Integrated Rapid Transport Phase 2A: Social Facilitation services for Work Package W4 within the City of Cape Town:** Public Information Days, Community Engagement and Liaison, Community leader engagement, Political leader engagement, micro profiling, liaison with directly affected stakeholders, strategic communications.
- **Integrated Rapid Transport Phase 2A: Social Facilitation services for Work Package E1 within the City of Cape Town:** Public Information Days, Community Engagement and Liaison, Community leader engagement, Political leader engagement, micro profiling, liaison with directly affected stakeholders, strategic communications.
- **Integrated Rapid Transport Phase 2A: Social Facilitation services for Work Package E2 within the City of Cape Town:** Public Information Days, Community Engagement and Liaison, Community leader engagement, Political leader engagement, micro profiling, liaison with directly affected stakeholders, strategic communications.
- **Integrated Rapid Transport Phase 2A: Social Facilitation services for Work Package E2 within the City of Cape Town:** Public Information Days, Community Engagement and Liaison, Community leader engagement, Political leader engagement, micro profiling, liaison with directly affected stakeholders, strategic communications.
- **Integrated Rapid Transport Phase 2A: Social Facilitation services for Work Package E6 within the City of Cape Town:** Public Information Days, Community Engagement and Liaison, Community leader engagement, Political leader engagement, micro profiling, liaison with directly affected stakeholders, strategic communications.
- **Mfuleni South East Integration Area Project – Relocation of affected dwellings and persons within the City of Cape Town.** Public Information Sessions, Community engagement services, Community leader engagement, Sub-council and Councillor engagement, micro profiling, liaison with directly affected stakeholders, strategic communications.
- **City of Cape Town: Area Economic Development - Upgrade of Informal Trading Facilities in Somerset West:** Social Facilitation and stakeholder engagement services.
- **City of Cape Town: Area Economic Development - Upgrade of Informal Trading Facilities in Kuils River:** Social Facilitation and stakeholder engagement services.
- **City of Cape Town: Area Economic Development - Upgrade of Informal Trading Facilities in Masiphumelele:** Social Facilitation and stakeholder engagement services.
- **Strategic Communications for the Commonwealth War Graves Commission Cape Town Labour Corps Memorial:** Stakeholder liaison, authority liaison, community engagement, facilitation of meetings with directly affected stakeholder groups, conflict resolution, crisis management, media liaison.
- **Big Bay Local Spatial Development Framework:** Public participation and stakeholder engagement in support of the development of a local spatial development framework, Big Bay, Cape Town.

- **Muizenberg Refurbishment Upgrade:** Public Information Days, Community Engagement and Liaison, Community leader engagement, Political leader engagement, liaison with directly affected stakeholders, strategic communications.

Environmental Assessment Practitioners Association of South Africa

Registration No. 2021/4150

Herewith certifies that

Michelle Lee

is registered as an

Candidate Environmental Assessment Practitioner

Registered in accordance with the prescribed criteria of Regulation 15. (1) of the Section 24H Registration Authority Regulations (Regulation No. 849, Gazette No. 40154 of 22 July 2016, of the National Environmental Management Act (NEMA), Act No. 107 of 1998, as amended).

Effective: 01 March 2022

Expires: 28 February 2023

Chairperson

Registrar

SAQA
SOUTH AFRICAN QUALIFICATIONS AUTHORITY

Appendix B

Locality Map


Locality Map
Proposed Expansion of the Khulani Energy Waste Management Facility
Legend
Site Locality
Google Earth
Image © 2025 Vexcel Imaging US, Inc.
80 m
N

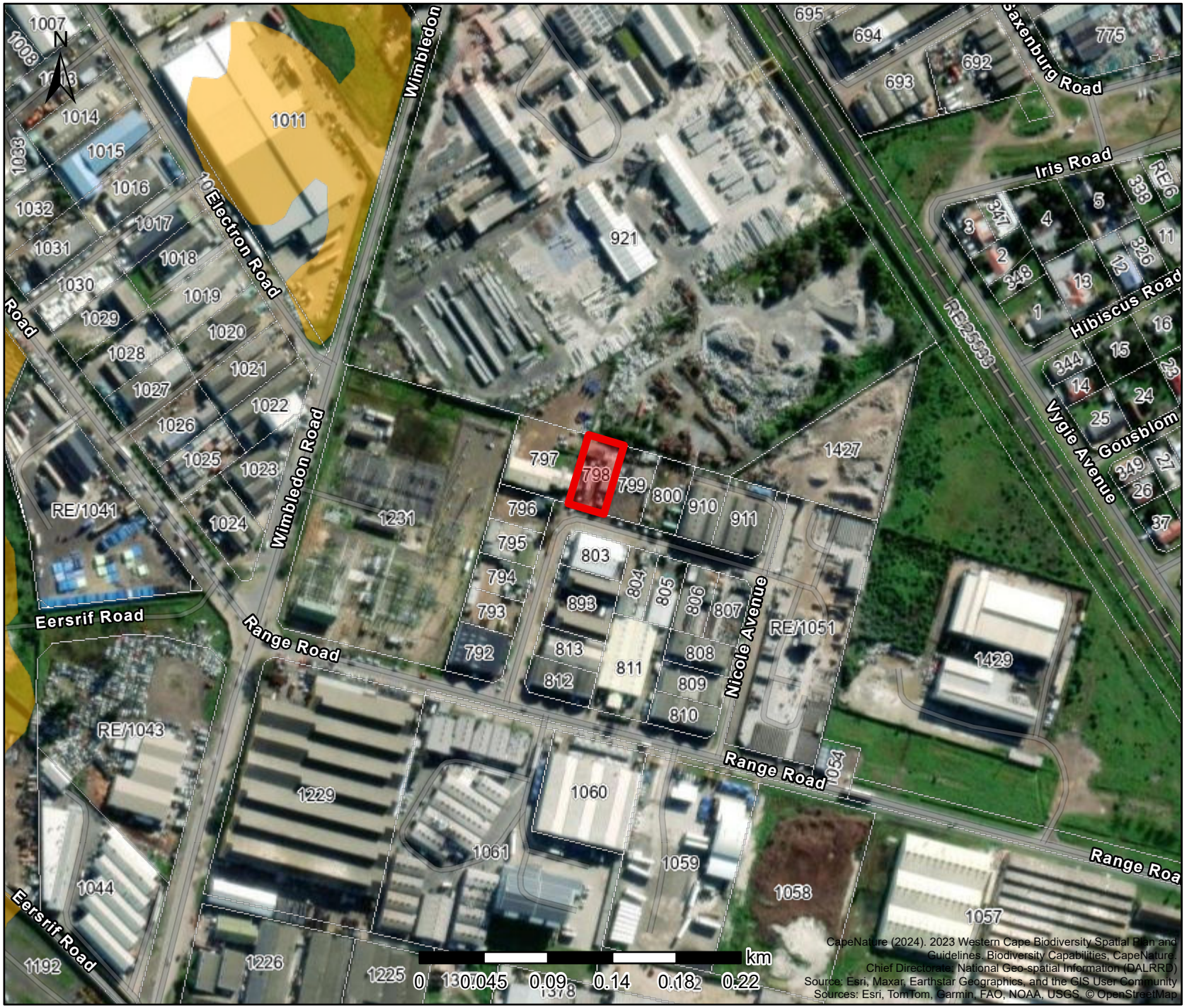

Locality Map
Proposed Expansion of the Khulani Energy Waste Management Facility
Legend
Site Locality
SITE
Google Earth
Image © 2025 Vexcel Imaging US, Inc.
1 km
N

Corner 1 co-ordinates			
Latitude (S)	33°	57'	32.52"
Longitude (E)	18°	41'	38.78"
Corner 2 co-ordinates			
Latitude (S)	33°	57'	32.50"
Longitude (E)	18°	41'	37.80"
Corner 3 co-ordinates			
Latitude (S)	33°	57'	34.01"
Longitude (E)	18°	41'	37.25"
Corner 4 co-ordinates			
Latitude (S)	33°	57'	34.21"
Longitude (E)	18°	41'	38.27"

Appendix C

Biodiversity Overlay Map

Biodiversity Overlay Map



Legend

Erf

Wetlands (NWM5)

Classification

Seep wetland

Map Center: Lon: 18°41'37.9"E
Lat: 33°57'34.1"S

Scale: 1:4,514

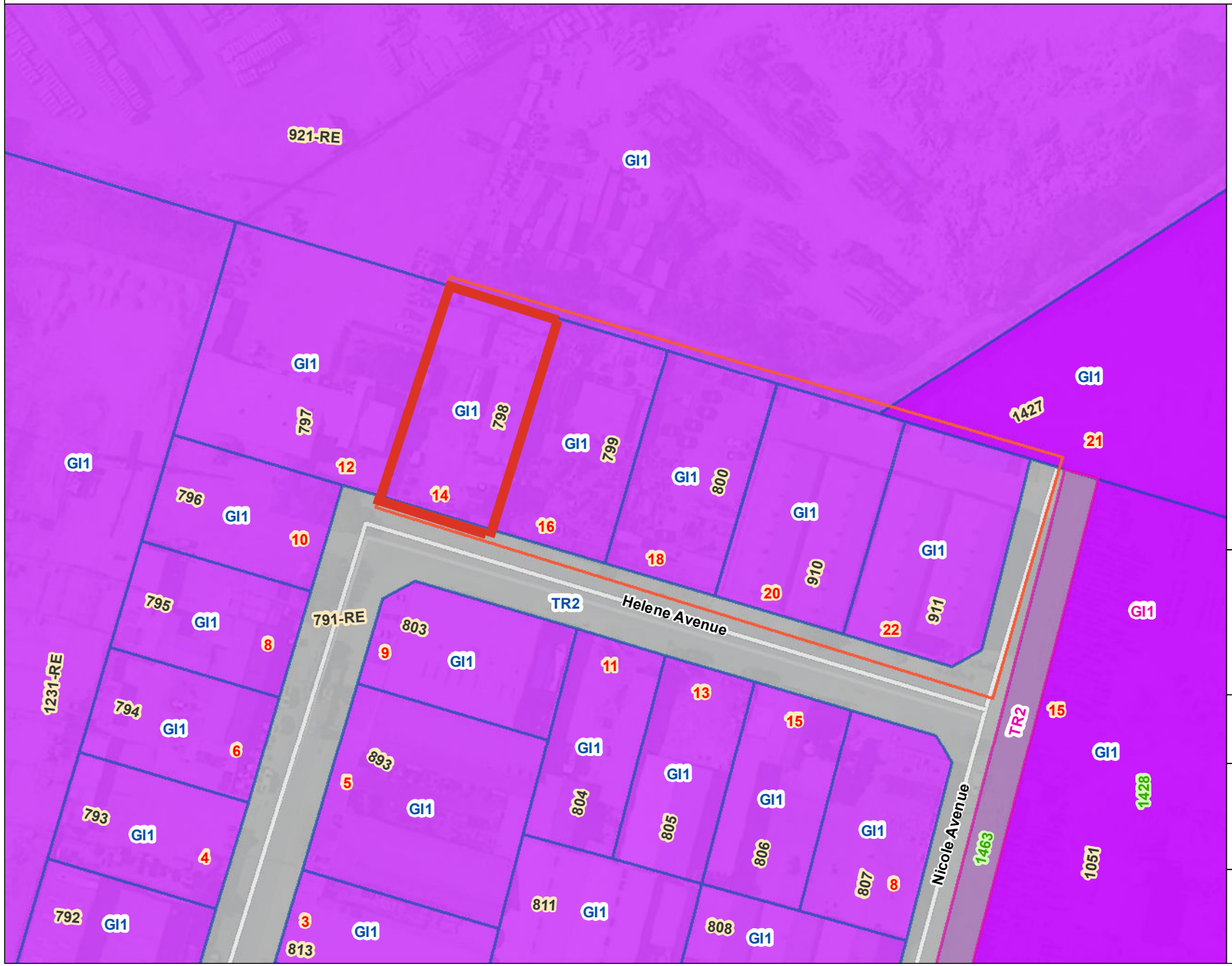
Date created: 2025/24/07

Western Cape Government
FOR YOU

Appendix D

Zoning Map

Zoning Map



Legend

Public
SG Approved
Registered

Zoning SG Approved Properties

INT_ZONE_DESC

General Industrial 1
Transport 2 : Public Road and Public Parking

Zoning Registered Properties

INT_ZONE_DESC

General Industrial 1
Transport 2 : Public Road and Public Parking
Street Number
SG Approved
Registered

0 10 20 30
Meters

1:1 500

Projection: Web Mercator Auxiliary Sphere (WMAS), Central Meridian 19° East
Spheroid: WGS_1984

Please Note:
- Every effort has been made to ensure the accuracy of information in this map at the time of publication.
- The spatial data portrayed in this map is as current, accurate and complete as provided by the various line departments responsible for the maintenance of these datasets.
- The City of Cape Town accepts no responsibility for, and will not be liable for, any errors or omissions contained herein.

THIS MAP WAS GENERATED BY THE

City of Cape Town Map Viewer

Information & Knowledge Management Department

Tel: +27 21 487 2711 Fax: +27 21 487 2821

city.maps@capetown.gov.za

Date: 2024-01-16

CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

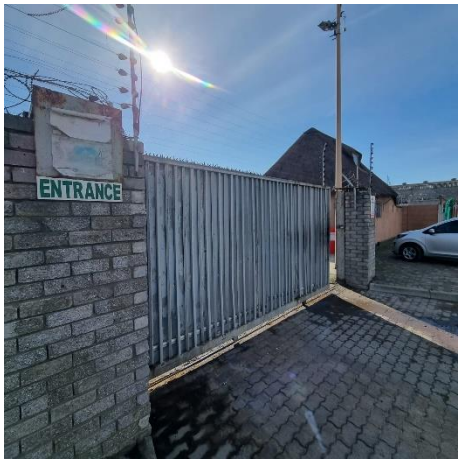
Making progress possible. Together.

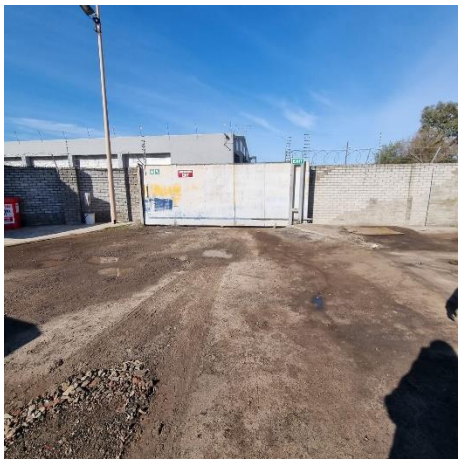
Appendix E

Site Photographs

Appendix E

Site Photographs






Castrol


Castrol


EMERGENCY
EXIT

Appendix F

Screening Tool Report

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number: N/A

Project name: N/A

Project title: N/A

Date screening report generated: 31/10/2024 16:32:12

Applicant: Khulani Energy

Compiler: Chand Consultants

Compiler signature:

.....

Application Category: Infrastructure|Localised infrastructure|Storage|Dangerous Goods|Hydrocarbon|Petroleum

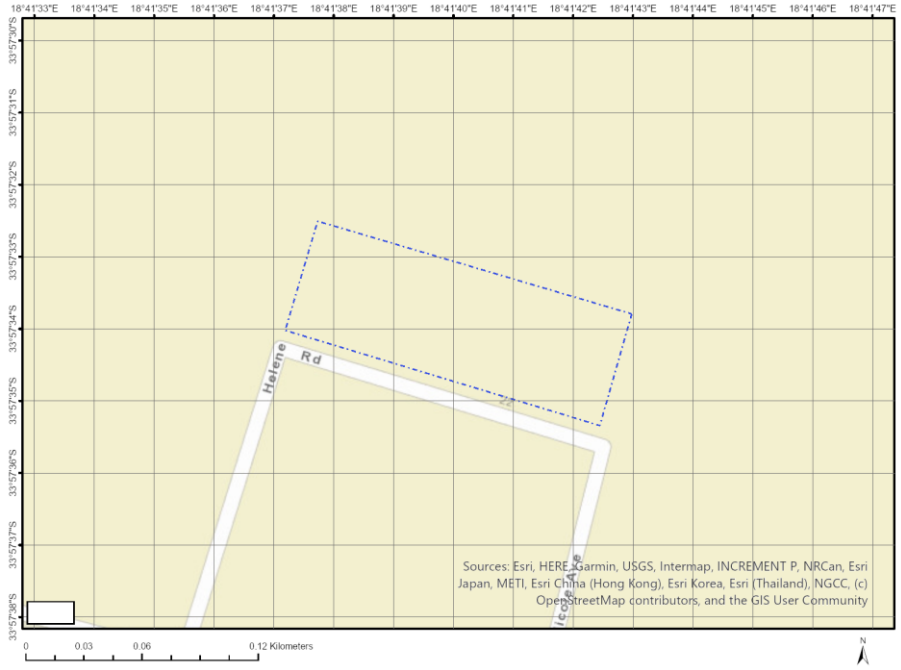
Table of Contents

Proposed Project Location

Orientation map 1: General location

General Orientation: N/A

Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	BLACKHEATH	797	0	33°57'33.03S	18°41'36.6E	Erven
2	BLACKHEATH	798	0	33°57'33.39S	18°41'38.01E	Erven
3	BLACKHEATH	799	0	33°57'33.62S	18°41'38.98E	Erven
4	BLACKHEATH	800	0	33°57'33.87S	18°41'39.95E	Erven
5	BLACKHEATH	910	0	33°57'34.1S	18°41'40.92E	Erven
6	BLACKHEATH	911	0	33°57'34.39S	18°41'42.05E	Erven

Development footprint[1] vertices:
No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No nearby wind or solar developments found.

[1] "development footprint", means the area within the site on which the development will take place and incudes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: **Infrastructure|Localised infrastructure|Storage|Dangerous Goods|Hydrocarbon|Petroleum**.

Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

Incentive, restriction or prohibition	Implication
Strategic Transmission Corridor-Central corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Combined_EGI.pdf
Main Electricity Distribution Substation	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Distribution_Transmission.pdf

Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme			X	
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme			X	
Paleontology Theme				X
Plant Species Theme				X
Terrestrial Biodiversity Theme	X			

Specialist assessments identified

Based on the selected classification, and the known impacts associated with the proposed development, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the

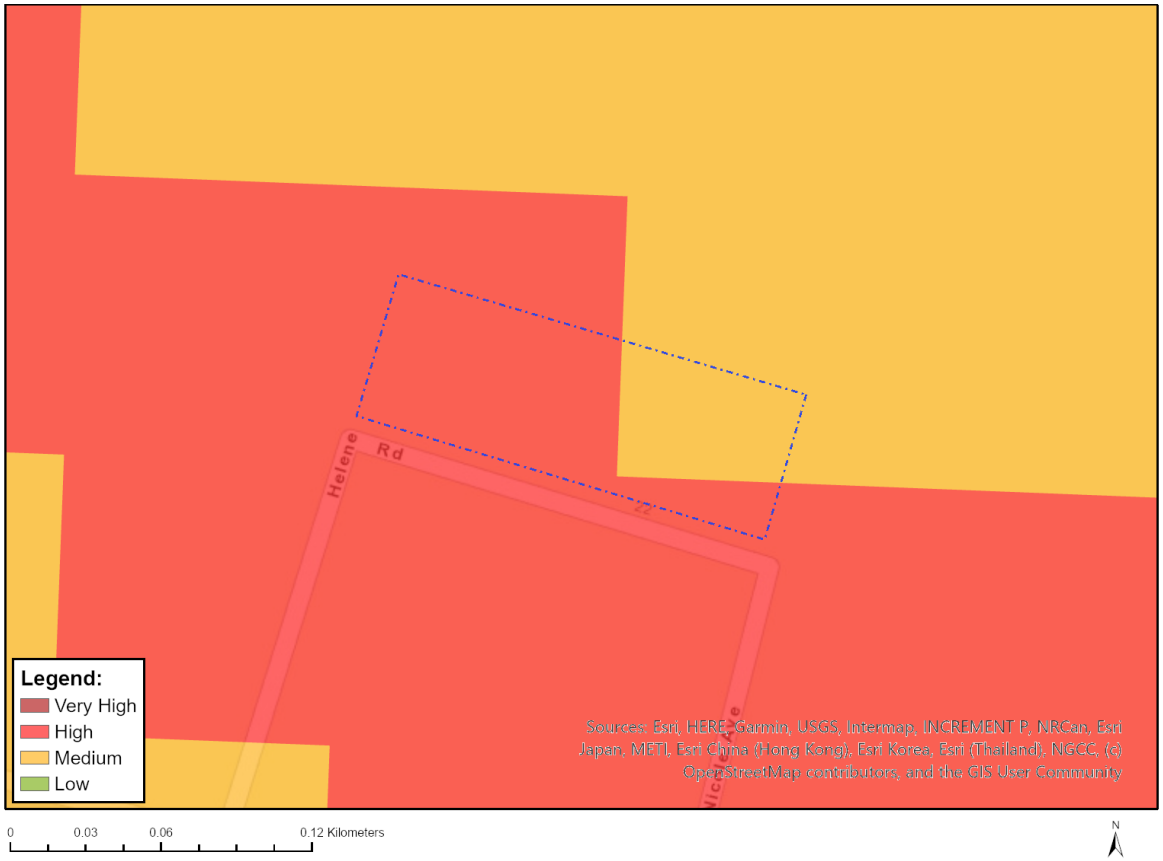
assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

No	Specialist assessment	Assessment Protocol
1	Agricultural Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Agriculture_Assessment_Protocols.pdf
2	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
3	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
6	Hydrology Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
7	Noise Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Noise_Impacts_Assessment_Protocol.pdf
8	Traffic Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
9	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
10	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
11	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
12	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY

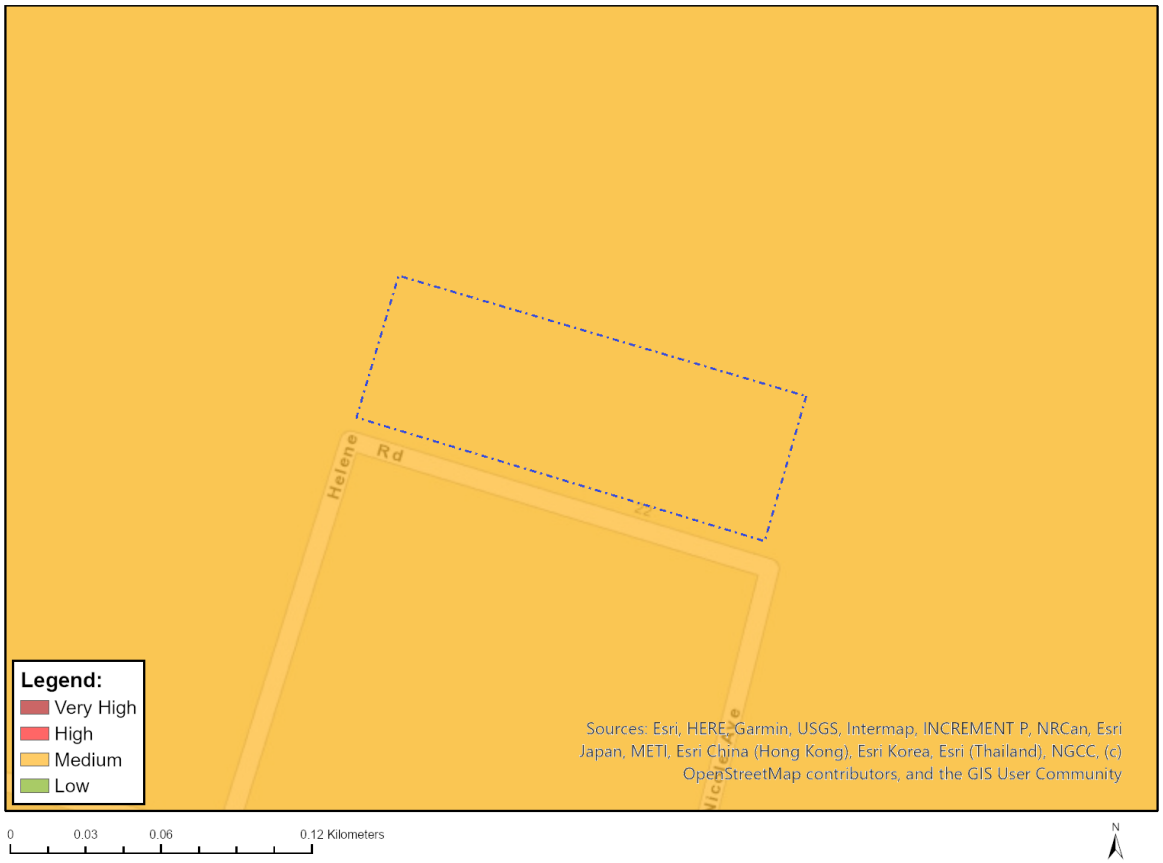


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Land capability;09. Moderate-High/10. Moderate-High
Medium	Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY



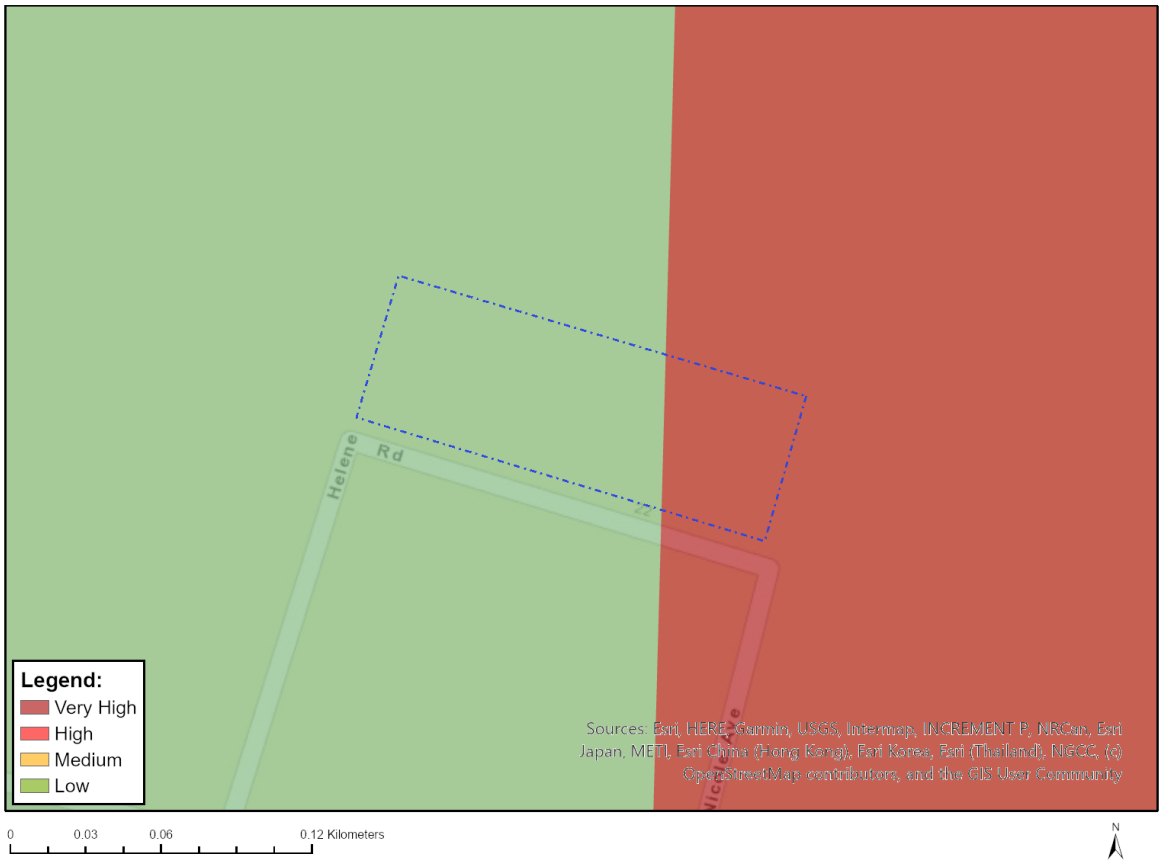
Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Invertebrate-Pachysoma aesculapius
Medium	Invertebrate-Conocephalus peringueyi
Medium	Invertebrate-Bullacris obliqua

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

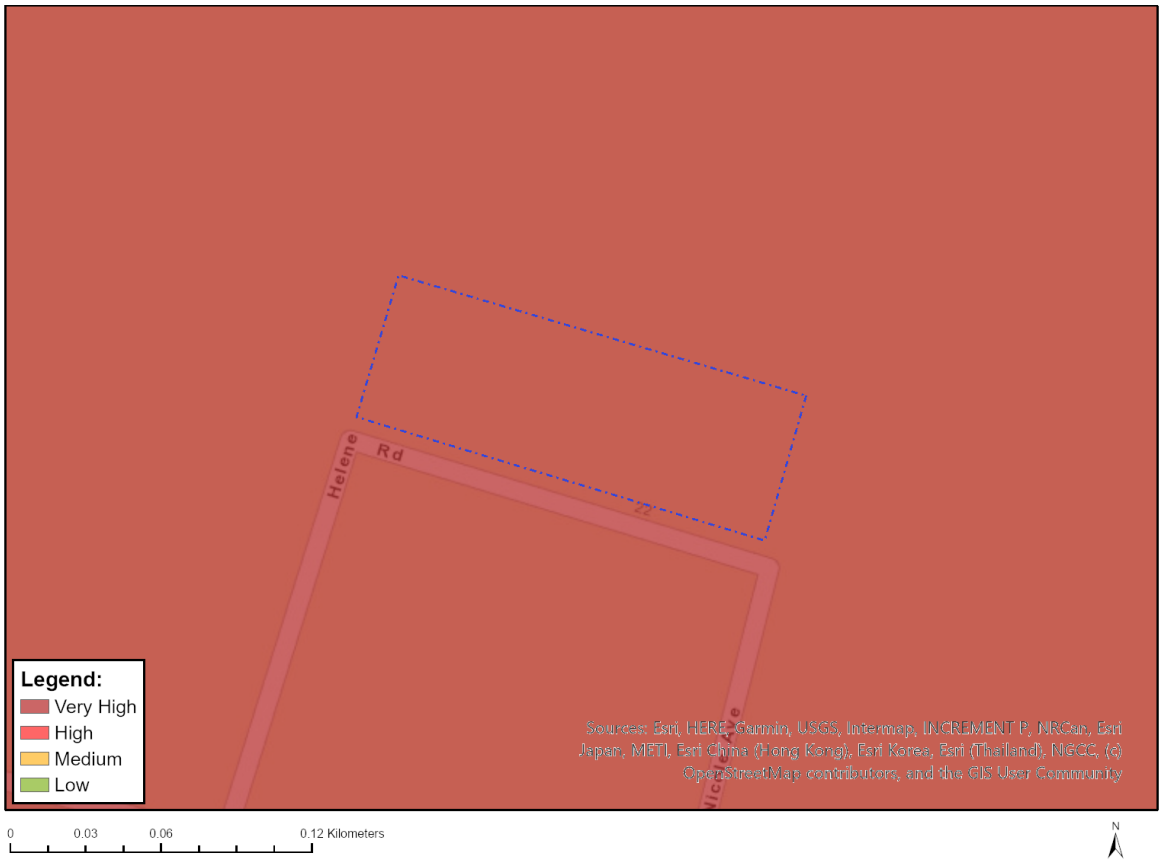


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity
Very High	SWSA (SW) _Boland

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

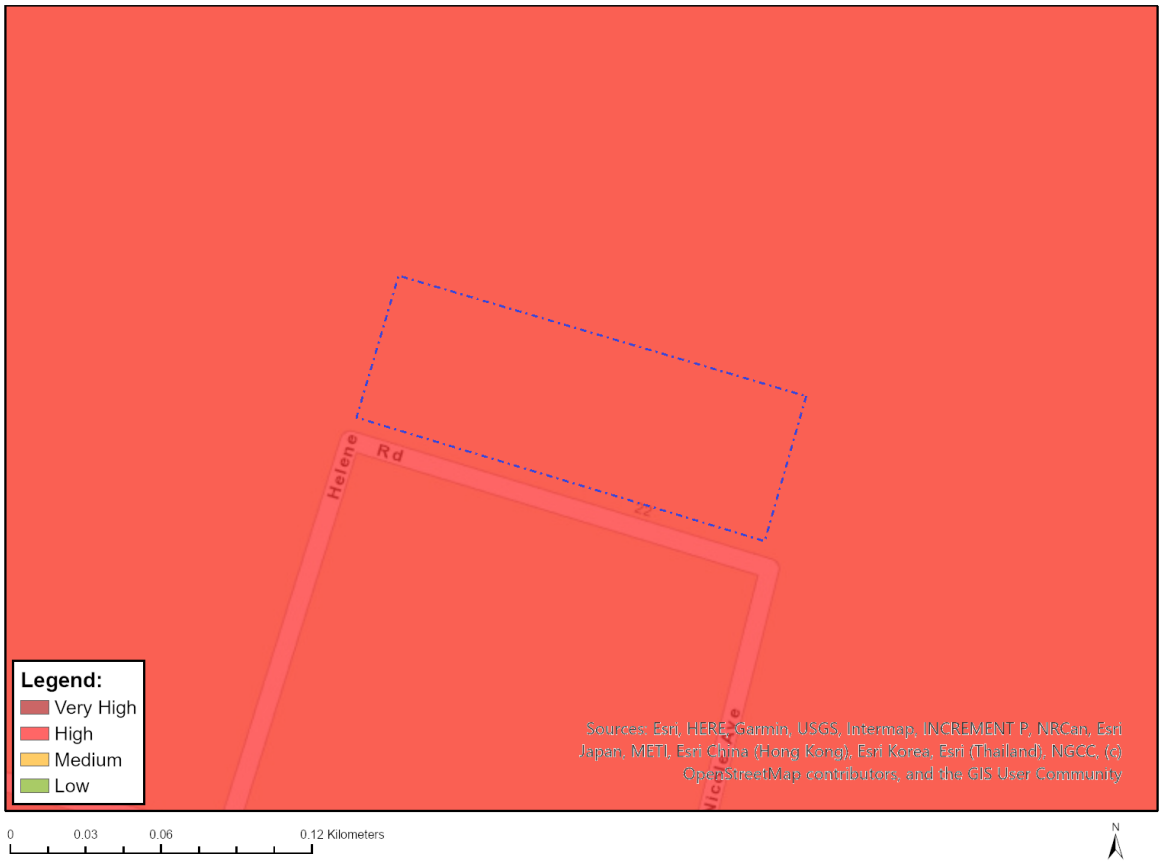


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	Within 2km of a Grade II Heritage site

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

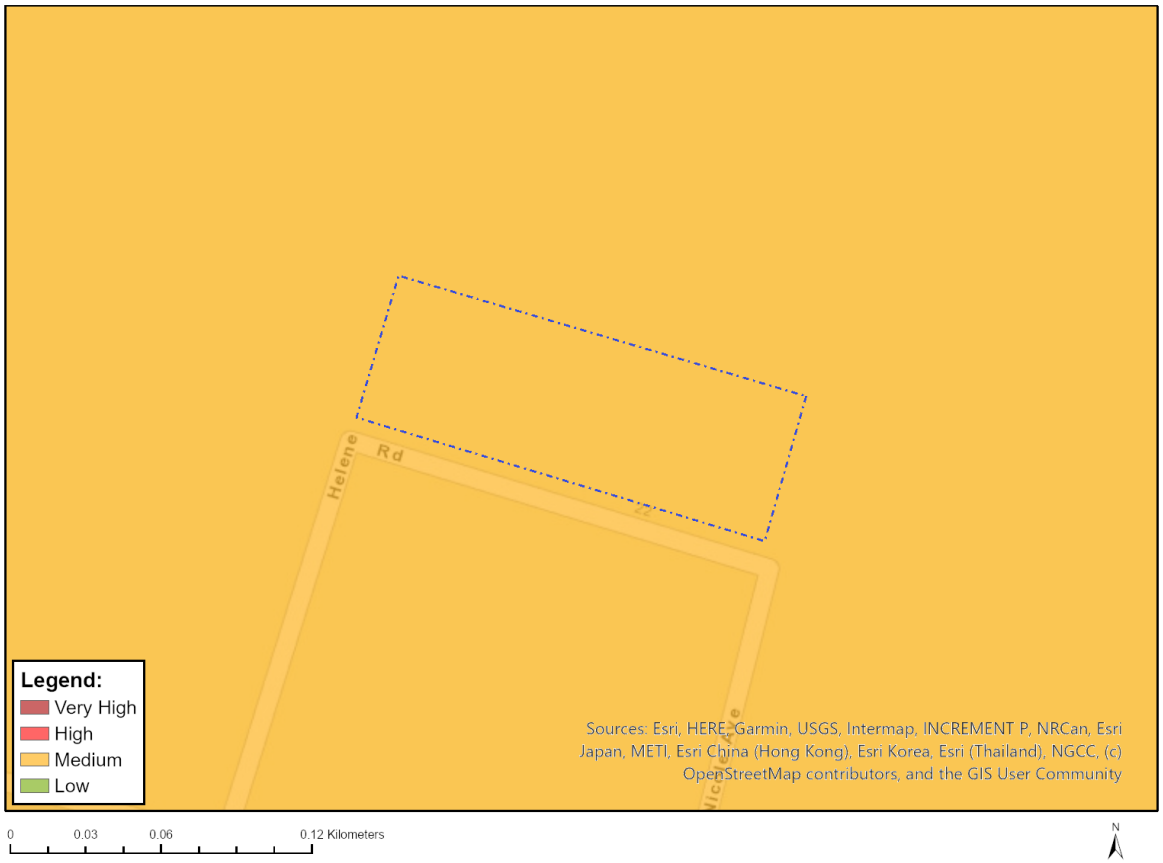


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within 15 km of a civil aviation radar
High	Between 8 and 15 km from a major civil aviation aerodrome
Medium	Between 8 and 15 km of other civil aviation aerodrome

MAP OF RELATIVE DEFENCE THEME SENSITIVITY

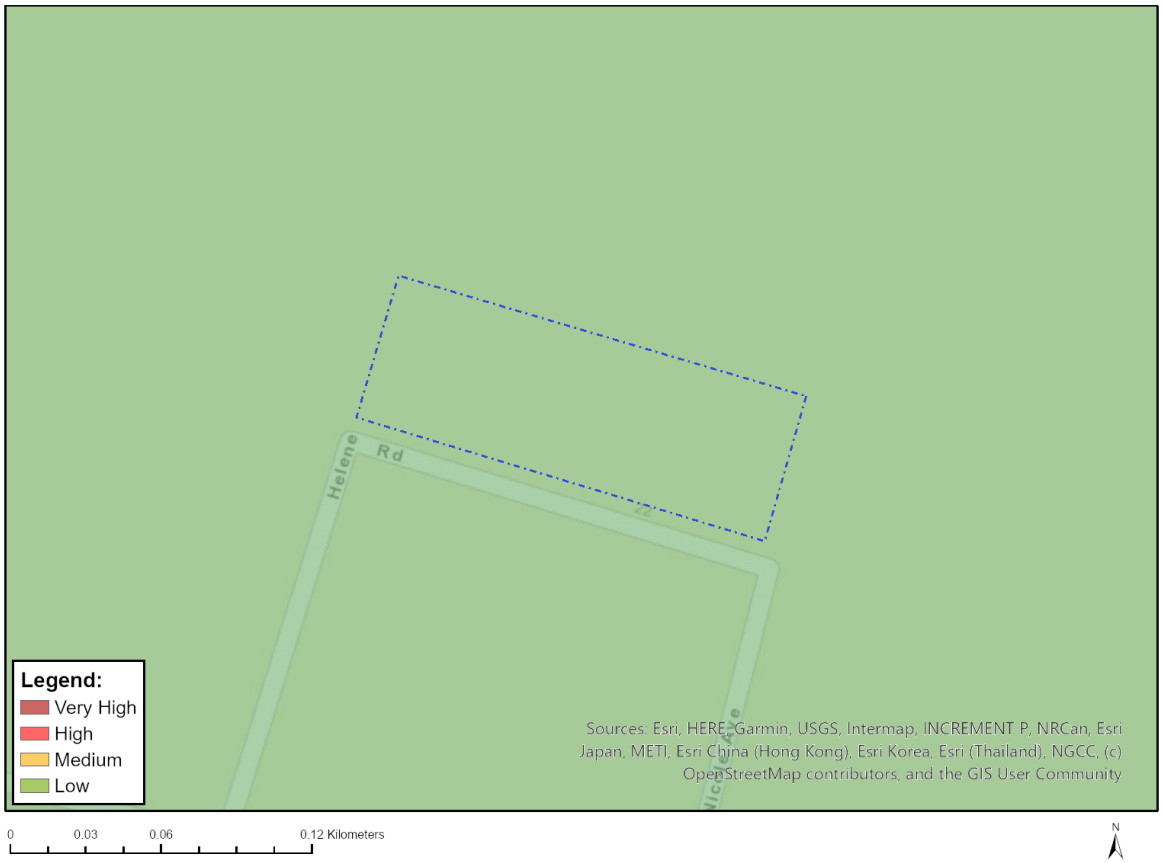


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Military and Defence Site

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

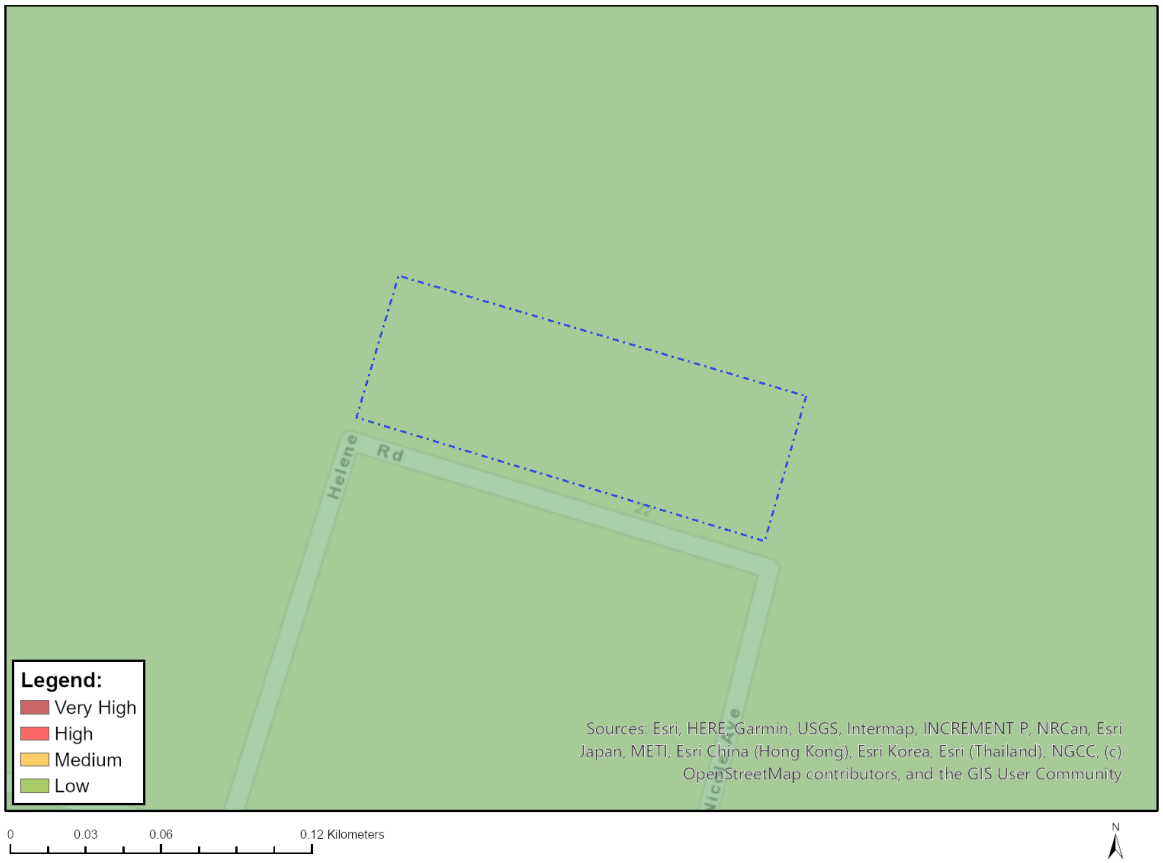


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Features with a Low paleontological sensitivity

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



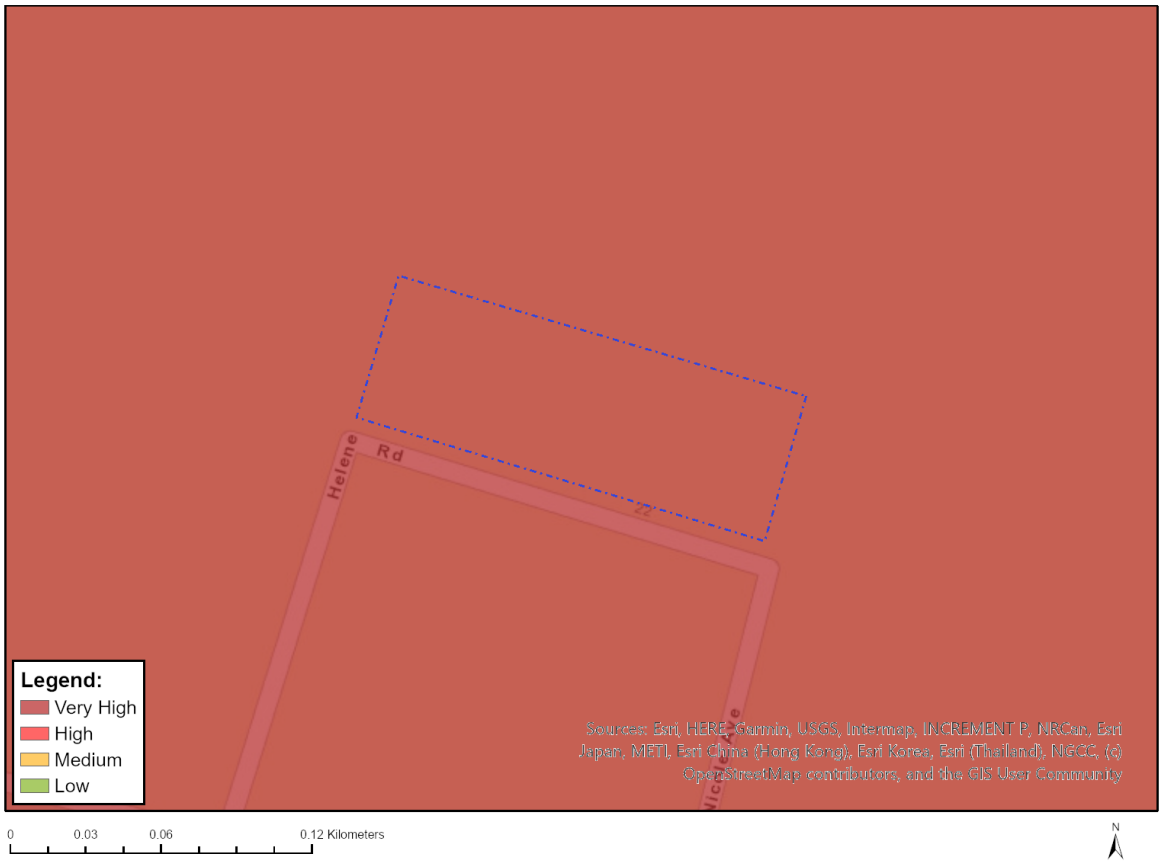
Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	SWSA (SW) _Boland
Very High	CR_Cape Flats Sand Fynbos

Appendix G

Site Sensitivity Verification Report

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SITE SENSITIVITY VERIFICATION REPORT

Khulani Energy Waste Management Facility

Storage and treatment of waste oil and wastewater at 14 Helene Avenue, Blackheath, City of Cape Town.

INTRODUCTION AND SCOPE:

The "Protocols for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes ("the Protocols") were promulgated in Government Notice No. 320, published in Government Gazette No. 43110 on 20 March 2020 and came into effect on 9 May 2020. The Protocols are allowed for in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA").

The Protocols must be complied with for every new application for Environmental Authorisation that is submitted after 9 May 2020. According to the Protocols, the EAP must verify the current use of the site in question and its environmental sensitivity as identified by the screening tool to determine the need for specialist inputs in relation to the themes included in the Protocols.

This document serves as the Site Sensitivity Verification Report for the proposed Khulani Energy Waste Management Facility which proposes to store and treat waste oil and wastewater onsite at 14 Helene Avenue, Blackheath, City of Cape Town. It serves to confirm and refine the findings of a Screening Tool Report (compiled on 23/01/2024) by ground truthing actual site conditions.

The site is currently being used to manage industrial and commercially generated waste oil at a small-scale. The facility collects, receives and stores waste oil (sourced from vehicle/ship engine oil, grease traps and manufacturing facilities) before transporting it to a recycling facility (LA Fuels and Motorlube) for treatment and disposal. Waste oil is stored within impermeable tanks for a maximum of two weeks before being transported to the recycling facilities. The Khulani Energy currently owns two 25 000L tanker trucks which are used to transport waste from the receiving sites and to the recycling facilities. The facility is currently accredited with the City of Cape Town as a waste service provider (please refer to Appendix B) and currently stores ~29 000L of waste oil on site at any time within impermeable tanks.

Access is granted off Helene Avenue through a security gate. Within the facility is a parking area for vehicles to offload and receive waste oil. An office is located on the southern border of the site, whereby access is granted. Two roofed structures with concrete floors are located on the western and northern boundaries. These structures currently house several waste storage tanks. Equipment, such as generators, are stored within the roofed structures.

Please refer to **Figure 1** for a locality map of the proposed facility.

Figure 1. Locality Map (created using Google Earth Pro, September 2024)

Figure 2: Zoomed out locality map showing the surrounding area (created using Google Earth Pro, October 2024)

Figure 3: Impermeable tanks stored on site that house wastewater for storage prior to transport offsite

Figure 4: Intermediate Bulk Container (IBC) tanks stored within a roofed structure on site.

Figure 5: IBC tanks stored within a roofed structure on site.

Figure 6. Empty storage tanks located on site

Figure 7. Used oil receiving storage tank located within the yard. The storage tank is bunded.

Figure 8. Stationary vehicle located within parking area to offload empty IBC.

Figure 9. Access/Security gate located off 14 Helene Avenue, Blackheath.

Figure 10:Visitors parking located off 14 Helene Avenue, Blackheath.

The sensitive themes identified and their respective sensitivity ratings as noted within the Screening Tool Report are noted in **Table 1** below.

Table 1. Screening Tool Report Theme Sensitivities

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme			X	
Aquatic Biodiversity Theme				X
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme			X	
Palaeontology Theme				X
Plant Species Theme				X
Terrestrial Biodiversity Theme	X			

SENSITIVITY VERIFICATION METHODOLOGY:
The site sensitivity verification statement was compiled by the EAP and is based on:

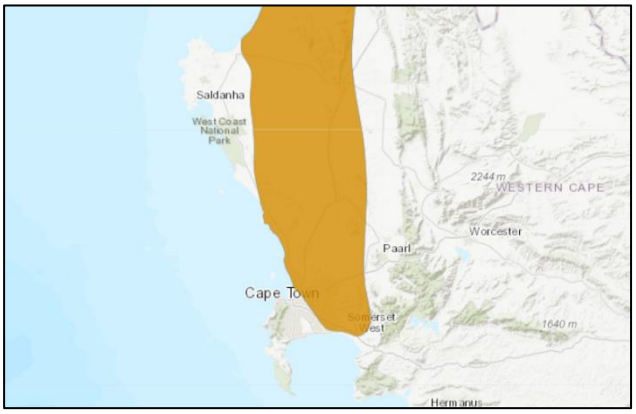
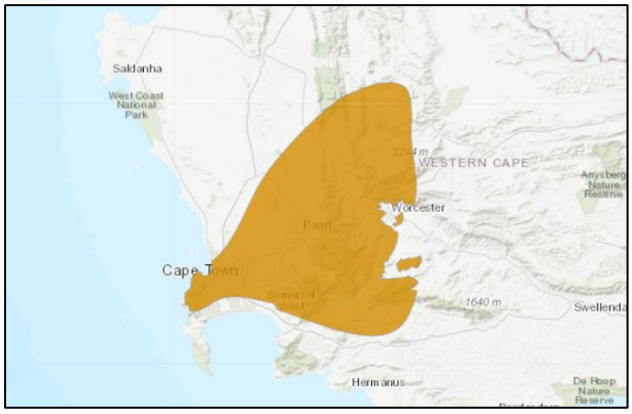
- A site visit undertaken on the 22nd of August 2024; and
- A desktop investigation using biodiversity and land use mapping tools (BGIS, Cape Farm Mapper, City of Cape Town Zoning Viewer, etc.).

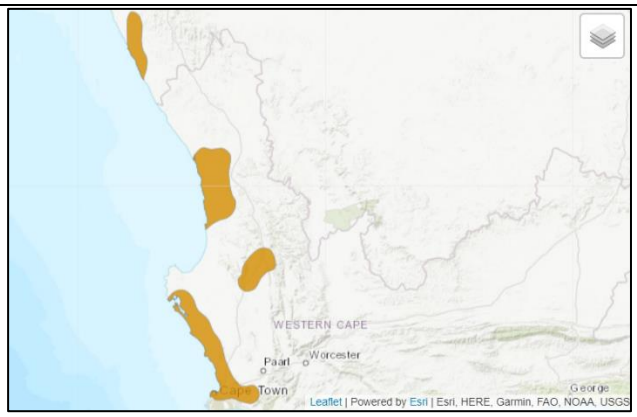
SITE SENSITIVITY VERIFICATION:
The table below, supporting photographs, graphics and maps serve to:

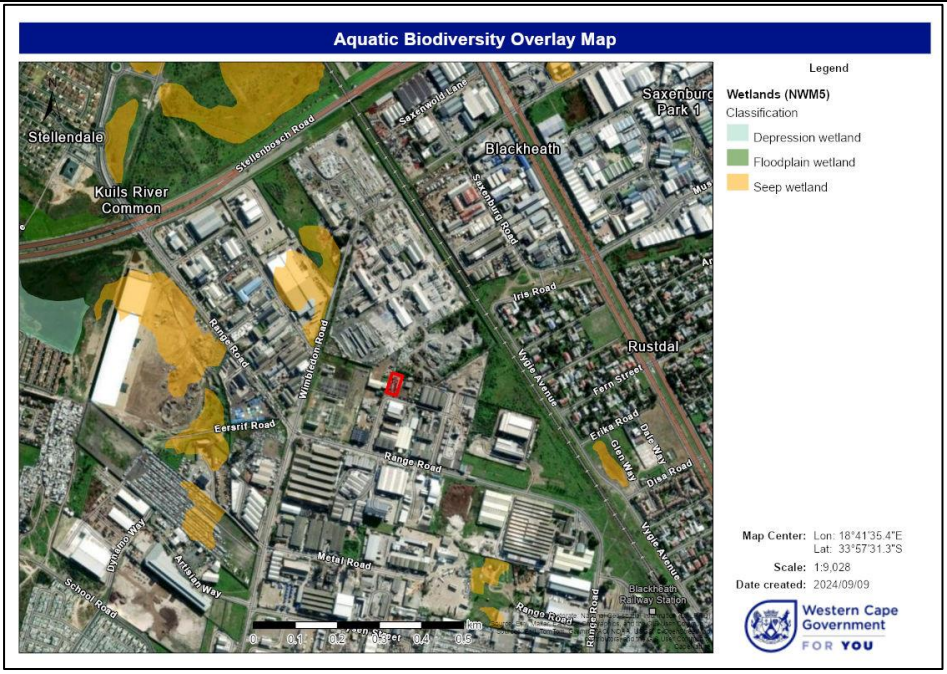
- Verify land use and sensitivities identified in the one screening report; and
- Confirm / contest the need for the various specialist inputs called for in terms of the screening tool report.

Table 2: Site Sensitivity Verification

SENSITIVITY AND SPECIALIST INPUT IDENTIFIED IN TERMS OF THE DFFE SCREENING TOOL	VERIFICATION OF SITE-SPECIFIC SENSITIVITY AND MOTIVATION ON THE NEED FOR SPECIALIST INVESTIGATION
Agricultural Theme High sensitivity Necessitating an agricultural impact assessment (in accordance with the protocol prescribed in Government Notice No. 320). Disputed Sensitivity: **No sensitivity**	The STR notes the site as having a High sensitivity for the Agricultural Theme, based on land capabilities of 9 (Moderate – High) and 10 (Moderate – High). However, this rating is viewed as erroneous as the site is located within a significantly transformed, industrial urban area where no farming or agriculture practices occur either on site or on the adjacent properties. Refer to Error! Reference source not found. and Error! Reference source not found. for an aerial satellite map which provides evidence of this. Additionally, refer to **Figure 3** to **Figure 10** for site photographs captured by the Chand, further demonstrating the industrial land use. The sensitivity rating is, therefore, contested. There is **no sensitivity** in terms of this theme and it has been determined that no agricultural assessment is required. The Department of Agriculture will however be included on the I&AP database.
Animal Species Theme Medium sensitivity	The STR indicates the site area having a Medium sensitivity for the Animal Species theme due to the presence of the following species:

Necessitating a Terrestrial Animal Species Specialist Assessment (in accordance with Animal Species Assessment Protocols prescribed in Government Notice No. 1150) Disputed Sensitivity: **No sensitivity**	• Invertebrate-*Pachysoma Aesculapius* • Invertebrate-*Conocephalus peringueyi* • Invertebrate-*Bullacris obliqua* *Pachysoma Aesculapius* is Vulnerable under criteria B1 and B2, due to this flightless species having a range restricted to a small region of coastal sands in the southwest of the Western Cape (refer to **Figure 11**). *Pachysoma Aesculapius* is restricted to the firm deep sand of coastal hummocks, riverbanks and vegetated dunes (IUCN, 2013). The site does not host any of these habitat types that would support this species.  **Figure 11: Species distribution map of Pachysoma Aesculapius (IUCN, 2024)** *Conocephalus peringueyi* is a katydid species known to inhabit the mountain regions within the Fynbos biome (refer to **Figure 12**). The species is listed as Vulnerable under criteria B1 and B2, due to its relatively small habitat area (IUCN, 2024).  **Figure 12: Species distribution map of Conocephalus Peringueyi (IUCN, 2024)** *Bullacris obliqua* (commonly known as the bladder grasshopper) is found within the Fynbos biome where *Eriocephalus africanus* is currently the only confirmed host plant for this species (SANBI, 2018). *Eriocephalus africanus* is found mostly on clay and granite slopes throughout the Western Cape, Eastern Cape and Namaqualand (refer to **Figure 13**) (IUCN, 2018). This vegetation is not found within the site area.

	 **Figure 13: Species distribution map of Bullacris Obliqua (IUCN, 2024)** The transformed and industrial nature of the site and surrounds, along with the absence of suitable habitats for these invertebrate species, makes it highly unlikely that these species are present on-site or that their populations will be disturbed during the construction and operational phases. Furthermore, no individuals were observed during the site assessment. The sensitivity rating is, therefore, contested as **No Sensitivity** and no specialist inputs are warranted.
Aquatic Biodiversity Theme Low sensitivity Necessitating an aquatic biodiversity impact assessment (in accordance with the protocol prescribed in GNR 320, Aquatic Biodiversity Assessment Protocols). Confirmed sensitivity: **No Sensitivity**	The STR indicates the site area having a Low sensitivity for the aquatic biodiversity theme. No mapped or observed watercourses, wetlands or aquatic features are located within the already developed site (refer to **Figure 14**). It is noted that a seep wetland has been mapped approximately 261m to the northwest of the site location, however this wetland has been infilled by local development. Additionally, the proposed expansion activities are not anticipated to have an impact on the local watercourses due to their localised extent and significant developed buffers between the proposed expansion and the mapped watercourses. Furthermore, the proposed activity does not include any abstraction activities or activities that would influence the local groundwater.

	 **Figure 14. Aquatic biodiversity overlay map. The proposed site is delineated in red (created using Cape Farm Mapper, September 2024)** The sensitivity rating is, therefore, contested as **No Sensitivity** and no specialist inputs are warranted. The Department of Water and Sanitation will however be included on the I&AP database.
Archaeological and Cultural Heritage Theme Very High sensitivity Necessitating archaeological & cultural impact assessments (General Assessment Protocols) Disputed Sensitivity: **No sensitivity**	The STR indicates a Very High sensitivity for the Archaeological and Cultural Heritage theme due to the proposed site being located within 2km of a Grade 2 Heritage Site. Due to the transformed nature and industrial zoning of the area, it is assumed that there are no remaining heritage elements present on-site. This assumption is further supported by a site inspection conducted on the 22nd of August 2024, during which no heritage resources were found. Additionally, no demolition works are proposed, as all proposed activities will occur within an existing facility. We note that the site is 1300.4m^2 in size, as such a Notification of Intent to Develop will be submitted to the Heritage Western Cape for their comment on require heritage processes to be followed. The sensitivity rating is, therefore, contested. The EAP does not consider an assessment necessary.
Civil Aviation Theme High sensitivity The need for a civil aviation assessment (in accordance with the protocol prescribed in GNR 320) Disputed Sensitivity: **No Sensitivity**	The STR indicates a High sensitivity for the Civil Aviation Theme due to the proposed site being located within 15km of a civil aviation radar, within 8 km – 15 km of a major civil aviation aerodrome, and within 8 km – 15 km of other civil aviation aerodromes. These are presumed to be the Cape Town International Airport and the Stellenbosch Aerodrome. The proposed expansion would, however, not affect any civil aviation activities given that the structures proposed will not exceed the existing height of structures on site (i.e., storage tanks) and will not comprise any telecommunications structures that may have potential to interfere with aviation activities. There are also no activities within the project that could affect this sensitivity or its operations. The sensitivity rating is, therefore, contested as **No Sensitivity.** As such, no specialist investigations are deemed necessary. The SACAA and their appointed obstacle assessment contractors ATNS will be included in the I&AP database.

Defence Theme Medium sensitivity Disputed Sensitivity: **No sensitivity**	The STR indicates a Medium sensitivity for the Defence theme, as the proposed site is situated in medium proximity to a 'Military and Defence site'; however, no further details are provided in this regard. This sensitivity is presumably attributed to the site being located within 8.2km from the 9 South African Infantry Battalion Base and 16km from the Wingfield Military Base (as the crow flies). None of the components of the development proposal would compromise the defence force's ability to defend the area against any unrest / threats on security, nor would they they hinder training and support for military personnel or affect the day-to-day operations of the base. The proposed development would not interfere with communications to and from the facility, as it does not include telecommunications infrastructure beyond typical internet and phone connections. Furthermore, it would not interfere or obstruct any access points due to its distance from them. As such, this rating is disputed as having **No sensitivity**. No specialist investigations are deemed necessary.
Paleontology Theme Low sensitivity Necessitating a palaeontological assessment (General Assessment Protocols). Confirmed sensitivity: **No Sensitivity**	The STR indicates a Low sensitivity for the Paleontology theme. This potential issue has been scoped out due to the existing developed status of the site. The site inspection conducted on the 22nd of August confirmed the accuracy of this rating. As a result, no specialist investigations are deemed necessary.
Plant Species Theme Low sensitivity Necessitating a plant species assessment (General Assessment Protocols). Confirmed sensitivity: **No Sensitivity**	The STR indicates a Low sensitivity for the Plant Species theme. No indigenous vegetation remains on-site in its current developed state. **Figure 3** to **Figure 10** are recent site photographs, clearly demonstrating the absence of indigenous vegetation on or around the site. As such, this rating is inaccurate as there is **No Sensitivity** in terms of this theme. As such, a botanical impact assessment will not be undertaken.
Terrestrial Biodiversity Theme Very High sensitivity Necessitating a terrestrial biodiversity impact assessment and a plant species assessment (Terrestrial Biodiversity Assessment Protocols) Disputed Sensitivity: **No sensitivity**	The STR indicates Very High sensitivity for the Terrestrial Biodiversity theme due to the site occurring within the Cape Flats Sand Fynbos Regions, a critical vegetation type. As noted above, the site is situated within a significantly transformed and industrial environment, with no evidence of indigenous vegetation or habitats that could constitute a functioning ecological system. The Very High sensitivity rating is attributed to the historical extent of the vegetation type, however, none of this remains on site today. As such, this rating is disputed to be **No Sensitivity**. The site holds no terrestrial biodiversity sensitivity. No specialist investigations are necessary.
Additional specialist studies called for by the Screening Report	

Landscape/Visual Impact Assessment (General Assessment Protocols)	The site is located within a significantly transformed and urbanized industrial environment, with no indigenous ecosystems or vegetation types present. The proposed development entails an expansion of an existing facility within an area zoned for industrial use, where the surrounding landscape is already characterized by built-up infrastructure and industrial activities. Given the nature of the site and its surroundings, the visual integrity of the area is already considerably altered, and the introduction of additional industrial structures is unlikely to further degrade or change the visual character of the landscape. As a result, the potential for landscape or visual impacts is deemed negligible, and a formal visual impact assessment is not considered necessary. This is supported by the fact that the proposed development will not introduce any significant or atypical visual elements that would contrast with the current industrial context. As such a landscape/visual impact assessment is not deemed necessary.
Hydrology (General Assessment Protocols)	The proposed activities will take place within an existing facility equipped with impermeable tanks for storing waste oil, indicating that proper infrastructure is in place to prevent contamination of surface or groundwater. There are no watercourses, wetlands, or other aquatic features on or near the site, and no water abstraction or groundwater impacts are anticipated. Given the lack of water-related risks and the site's existing industrial use, the EAP considers a hydrology assessment unnecessary.
Noise Impact Assessment (Noise Impacts Assessment Protocols as prescribed by GN 43855)	The proposed development is not likely to significantly increase the noise compared to the current noise levels on site. The addition of extra tanks and the additional vehicles needed to transport the proposed waste may create minor additions to noise levels of the surrounding area. However, due to the industrial zoning of the surrounding area, this noise is not anticipated to affect any surrounding properties. Any noise generated during the construction phase would be short term and controlled through measures included in the EMPr. As a result, no further assessment is considered necessary in this regard.
Traffic Impact Assessment (General Assessment Protocols)	A Traffic Impact Assessment is not considered necessary due to the facility already being operational and regularly receiving waste oil and wastewater for storage on site. The same number of truck deliveries/offloads are anticipated. The proposed activities are an extension of existing operations, and no significant increase in traffic volume is anticipated as the facility's logistical patterns are already established. Furthermore, the site is located in an industrial area which has been spatially planned to accommodate the anticipated traffic volumes and loads, ensuring that the current transport capacity can adequately handle both existing and proposed operations without the need for a formal traffic impact assessment. As such specialist input in the form of a Traffic Impact Assessment is not deemed necessary.

Geotechnical Assessment (General Assessment Protocols)	A geotechnical assessment is not deemed necessary because the facility is situated on an already developed property, where the underlying soil and ground conditions have demonstrated stability for the existing infrastructure. As the proposed new infrastructure is not expected to significantly alter the current conditions, the existing geotechnical data remains relevant. As a result, no further assessment is considered necessary in this regard.
Climate (General Assessment Protocols)	The project is not anticipated to generate any air emissions or trigger any activities as per the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). The climate impacts and aspects are discussed further within this report.
Health (General Assessment Protocols)	A health assessment is not deemed required as the project involves the expansion of an existing facility. Furthermore, all activities will be conducted in accordance with the Occupational Health and Safety Act (OHSA), which mandates compliance with health and safety regulations, thereby mitigating any potential health risks associated with the proposed activities.
Socio-Economic Assessment (General Assessment Protocols)	A Socio-Economic Assessment is not deemed necessary due to the small-scale nature of the project and the fact that the site is already utilized for industrial purposes. This report addresses the socio-economic parameters of the community, utilizing census-based data for accuracy. Additionally, opportunities and benefits for the local community will be considered and incorporated within the regulatory process, ensuring that relevant socio-economic factors are adequately addressed.
Ambient Air Quality Impact Assessment	The project is not anticipated to generate significant air emissions or trigger any activities as per the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). Therefore, an assessment is not deemed necessary.
Air Quality Impact Assessment	The project is not anticipated to generate significant air emissions or trigger any activities as per the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). Therefore, an assessment is not deemed necessary.

REFERENCES:

Davis, A.L.V. (2013) *The IUCN Red List of Threatened Species*, *IUCN Red List of Threatened Species*. Available at: https://www.iucnredlist.org/species/137321/523186 (Accessed: 13 September 2024).

Corinna Bazelet (IUCN SSC Orthoptera Specialist Group) and Piotr Naskrecki (IUCN SSC Orthoptera Specialist Group) (2014) *The IUCN Red List of Threatened Species*, *IUCN Red List of Threatened Species*. Available at: https://www.iucnredlist.org/species/20633594/43266622 (Accessed: 13 September 2024).

Corinna Bazelet (IUCN SSC Orthoptera Specialist Group) and Vanessa Couldridge (University of the Western Cape, S.A. (2018) *The IUCN Red List of Threatened Species*, *IUCN Red List of Threatened Species*. Available at: https://www.iucnredlist.org/species/100946682/100947328 (Accessed: 13 September 2024).

Red list of South African species (2018) *SANBI*. Available at: https://speciesstatus.sanbi.org/assessment/last-assessment/4376/ (Accessed: 13 September 2024).

Appendix H

Public Participation Materials

NOTIFICATION OF THE PUBLIC PARTICIPATION PROCESS (PPP) AND AVAILABILITY OF THE DRAFT SCOPING REPORT FOR PUBLIC REVIEW AND COMMENT AS PART OF SCOPING AND EIA PROCESS FOR THE PROPOSED EXPANSION OF THE KHULANI ENERGY AND PLANT MAINTENANCE FACILITY, ERF 798, BLACKHEATH, CITY OF CAPE TOWN

Proposed Development:	Proposed Expansion of the Khulani Energy and Plant Maintenance Facility
Location:	Erf 798 at 14 Helene Avenue, Blackheath, Cape Town
Date of Publication:	25 July 2025
DFFE Application Reference Number:	12/9/11/L250722125434/9/N/Khulani Energy Waste Management

Notice is hereby given of a Public Participation Process (PPP) in terms of the National Norms and Standards for the Storage of Waste, as promulgated by the National Environmental Management: Waste Act (Act 59 of 2008), as well as the 2014 EIA Regulations (as amended) as contemplated in Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).

The expanded facility will provide the following waste management services:

- Collection and transport of wastewater and waste oil;
- Treatment and disposal of wastewater and waste oil;
- Sludge removal;
- Wastewater disposal sump and drain cleaning;
- 24-hour spill response services; and
- Installation and maintenance of machinery, including pump services, pump installation, and welding.

Application for a Waste License (in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)) will be made for the following activities:

- Government Notice 921 of 29 November 2013, as amended (Category A – Activity 5)
- Government Notice 921 of 29 November 2013, as amended (Category A – Activity 7)
- Government Notice 921 of 29 November 2013, as amended (Category B – Activity 3)
- Government Notice 921 of 29 November 2013, as amended (Category B – Activity 4)

Chand Consultants has been appointed by the applicant as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping Report and EIA process. This advertisement therefore serves to:

- Notify you of the proposed development;
- Invite you to register as an Interested and Affected Party (I&AP); and
- Invite you to provide comment on the Draft Scoping Report.

YOUR INVITATION TO PARTAKE IN THE PUBLIC REVIEW PERIOD OF THE DRAFT SCOPING REPORT DOCUMENT:

COMMENT PERIOD: 25 July 2025 to 25 August 2025

An electronic copy of the documentation will also be made available upon request as well as for download on the website of Chand Environmental Consultants (https://www.chand.co.za/the-know-how-3-2/projects-under-review-2024/).

Should you or your organisation have any comments or queries regarding this project or the documentation, or if you would like to participate in the process and be notified of further opportunities to provide comment, please ensure that you register as an I&AP by writing to **Chand Consultants** by no later than **25 August 2025:**

Postal Address: Block A, Plum Park
4 St. Clair Road
Plumstead
7800

Tel: 021 762 3050

Email: info@chand.co.za

CHAND
CONSULTANTS

Please note that I&APs must provide their name, contact details (postal address, telephone, fax numbers and email address) and an indication of any direct business, financial, personal, or other interest they may have in the approval or refusal of this application. Please include the full project name in any comments. Note that this is a public process and your name and comments submitted through this process would be made public as part of the Scoping process.

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Plumstead
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FAX: 086 665 7430
E-MAIL: info@chand.co.za

Attention: Potential Interested and Affected Party (I&AP)

NOTIFICATION OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF THE DRAFT SCOPING REPORT FOR PUBLIC REVIEW AND COMMENT AS PART OF SCOPING AND EIA PROCESS FOR THE PROPOSED EXPANSION OF THE KHULANI ENERGY AND PLANT MAINTENANCE FACILITY, ERF 798, BLACKHEATH, CITY OF CAPE TOWN

DFFE Reference number: 12/9/11/L250722125434/9/N/Khulani Energy Waste Management

Date: 24 July 2025

Dear Sir / Madam

Notice is hereby given of a Public Participation Process (PPP) in terms of the 2014 EIA Regulations (as amended) as contemplated in Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as well as the National Norms and Standards for the Storage of Waste, as promulgated by the National Environmental Management: Waste Act (Act 59 of 2008). This letter serves as notification of the project, your opportunity to register as an Interested and Affected Party (I&AP) and to advise that the Scoping Report and related documentation is available for a 30-day public review period from **25 July 2025 to 25 August 2025**.

The Khulani Energy and Plant Maintenance Company is proposing an expansion of the existing facility. The proposed expansion will necessitate additional infrastructure and processing capacity to accommodate increased volumes of waste material.

The expanded facility will provide the following waste management services:

- Collection and transport of wastewater and waste oil;
- Treatment and disposal of wastewater and waste oil;
- Sludge removal;
- Wastewater disposal sump and drain cleaning;
- 24-hour spill response services; and
- Installation and maintenance of machinery, including pump services, pump installation, and welding.

The proposed expansion of the waste management facility aims to provide wastewater and waste oil treatment processes while ensuring compliance with environmental regulations. The waste handled by the facility constitutes hazardous waste and the expansion will require a Waste Management License due to increased hazardous waste processing capacity.

The development proposal triggers the following listed activity in terms of the National Environmental Management Waste Act, 2008 (Act No. 59 of 2008) requiring a Scoping and EIA process to be undertaken to obtain environmental authorisation from the Competent Authority, the Department of Forestry Fisheries and Environment (DFFE): Waste Management.

Application for a Waste License (in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)) is being made for the following listed activities:

NO. & DATE OF THE RELEVANT NOTICE:	ACTIVITY NUMBERS (AS LISTED IN THE WASTE MANAGEMENT ACTIVITY LIST) :	LIST EACH ACTIVITY AS PER THE RELEVANT NOTICE
Government Notice 921 of 29 November 2013, as amended	Category A – Activity 5	The recovery of waste including the refining, utilisation, or co-processing of waste in excess of 10 tons but less than 100 tons of general waste per day or in excess of 500 kg but less than 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
Government Notice 921 of 29 November 2013, as amended	Category A – Activity 7	The treatment of hazardous waste using any form of treatment at a facility that has the capacity to process in excess of 500 kg but less than 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment

Government Notice 921 of 29 November 2013, as amended	Category B – Activity 3	The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
Government Notice 921 of 29 November 2013, as amended	Category B – Activity 4	The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment.

Refer to **Figure 1** below for the Locality Map.

Chand Consultants has been appointed by the Applicant as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and EIA process required. **This letter serves to advise you that the Draft Scoping Report and associated appendices are available for a 30-day public review period from 25 July 2025 to 25 August 2025.**

Details of the availability of Draft Scoping Report are tabled below:

YOUR INVITATION TO PARTAKE IN THE PUBLIC REVIEW PERIOD OF THE DRAFT BAR
COMMENT PERIOD: 25 July 2025 to 25 August 2025 An electronic copy of the documentation will be made available for download on the Chand Environmental Consultants website (https://www.chand.co.za/the-know-how-3-2/projects-under-review-2024/) for the duration of the comment period. Electronic/hard copies of the report can be made available to registered Interested and Affected Parties (I&APs) upon reasonable request.

Should you or your organisation have any comments or queries regarding this project or the documentation, or if you would like to participate in the process and receive future notifications on the project, please ensure that you register as an I&AP in writing and/or provide your written comment to **Chand Consultants** by no later than **25 August 2025.**

Postal Address:	Block A, Plum Park, 4 St Clair Road, Plumstead 7800
Email:	info@chand.co.za
Tel:	021 762 3050

Please note that I&APs must provide their name, contact details (postal address, telephone and email address) and an indication of any direct business, financial, personal, or other interest they may have in the approval or refusal of this application. **The full project name should be quoted in response to this correspondence.**

Also note that this is a public process and your name, contact information and original comments submitted through this process would be submitted to the DFFE as part of the final report submission.

Kindly note that I&APS who register on the I&AP database, would have to do so in alignment with the Protection of Personal Information Act (No. 4 of 2013), as amended (POPIA), and would thereby consent to their information being stored on the project database, to be shared with the Applicant, the Competent Authority in the Scoping Report, and to be shared with any appellants (who would have to be a registered I&AP), should someone wish to appeal any decision/s by the Competent Authority related to this process. Furthermore, these details will become part of the public record of the appeal.

If you do not wish to be part of this public process or you would like to be removed from this database, please confirm in writing to the above-mentioned contact information.

Kind regards,
Chand Consultants

CHAND
CONSULTANTS

Block A, Plum Park
4 St. Clair Road
Plumstead
7800

TEL: 021 762 3050
FAX: 086 665 7430
E-MAIL: info@chand.co.za

Appendix A:
Locality Map

Figure 1. Site Locality Map (Created using Google Earth Pro, 2025)

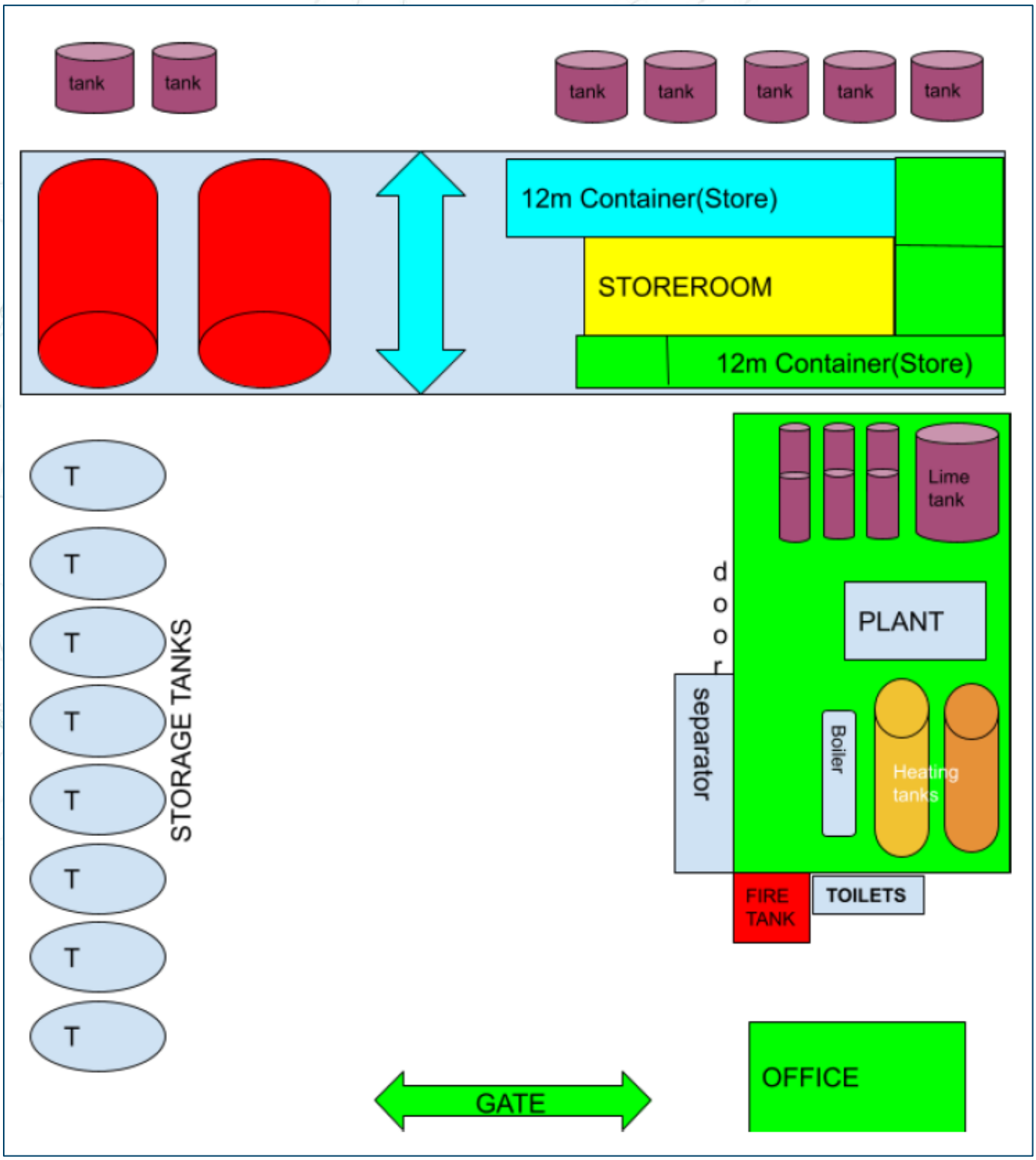
CHAND CONSULTANTS

Block A, Plum Park
4 St. Clair Road
Plumstead
7800

TEL: 021 762 3050
FAX: 086 665 7430
E-MAIL: info@chand.co.za

Appendix B:

Layout diagram of the proposed expanded facility



NAME	SURNAME	PERSON IN CARE OF PROPERTY	ORGANISATION	DESIGNATION
PROJECT TEAM				
Ingrid	Eggert		Chand Consultants	EAP
Sabrina	Thorndike		Chand Consultants	EAP
Lawrence	Sipho Thalo		Khulani Energy	Applicant
Nombulelo	Ntulini		Khulani Energy	
STATE DEPARTMENTS				
Ramatsemela Annah	Ngoepe		National Department of Forestry, Fisheries and the Environment (DFFE): Waste Management	
Bongani	Mabunda		National Department of Forestry, Fisheries and the Environment (DFFE): Waste Management	
Bongani	Mashika		National Department of Forestry, Fisheries and the Environment (DFFE): Waste Management	
Tsakani	Sambo		National Department of Forestry, Fisheries and the Environment (DFFE): Waste Management	
RO	Makhubele		National Department of Forestry, Fisheries and the Environment (DFFE)	
Samkeliswe	Dlamini		National Department of Forestry, Fisheries and the Environment (DFFE)	
Salome	Membane		National Department of Forestry, Fisheries and the Environment (DFFE)	Enquiries - Integrated Environmental Authorisations: Priority Infrastructure Developments
Ephron	Maradwa		National Department of Forestry, Fisheries and the Environment (DFFE)	Enquiries - Integrated Environmental Authorisations: Priority Infrastructure Developments
Lucas	Mahlangu		National Department of Forestry, Fisheries and the Environment (DFFE)	Waste Management licensing
Varsha	Naidoo		National Department of Forestry, Fisheries and the Environment (DFFE)	Environmental Management Inspector: Administrative Enforcement
C	Fredericks		National Department of Forestry, Fisheries and the Environment (DFFE)	
Linda	Poll-Jonker		National Department of Forestry, Fisheries and the Environment (DFFE)	Control Environmental Officer: Licensing
Shonisani	Munzhedzi		Department of Environment, Forestry and Fisheries (DEFF): Biodiversity and Conservation	Deputy Director-General: Biodiversity and Conservation
Warren	Dreyer		National Department of Water and Sanitation	Regional Manager
Lance	McBain-Charles		Department of Environmental affairs & Development Planning: Waste Management	Deputy Director: Waste Management Licensing
Etienne	Roux		Department of Environmental affairs & Development Planning: Waste Management	Specialised Environmental Officer: Waste Management Licensing
Onaeziwe	Ndletyana		Department of Environmental affairs & Development Planning: Waste Management	
Jov	Leaner		Department of Environmental Affairs and Development Planning: Air Quality Management	Directorate: Air Quality Management
Peter	Harmse		Department of Environmental affairs & Development Planning: Air Quality	Directorate: Air Quality Management
Sibusiso	Sinuka		Department of Environmental affairs & Development Planning: Air Quality	Directorate: Air Quality Management
Thorsten	Aab		Department of Environmental affairs & Development Planning: Pollution and Chemical Management – Remediation and Emergency Incident Management	Control Environmental Officer Grade A
Marlene	Laros		Department of Environmental affairs & Development Planning: Biodiversity	Directorate: Biodiversity
Eldon	Van Boom		Department of Environmental affairs & Development Planning: Directorate: Development Management, Region 1	Control Environmental Officer (Grade B)
Taryn	Dreyer		Department of Environmental affairs & Development Planning: Development Management, Region 1	Head of Department, Development Management Directorate, Region 1
Rondine	Isaacs		Department of Environmental affairs & Development Planning: Development Management, Region 1	Case Officer
Pieter	Van Zyl		Department of Environmental Affairs and Development Planning: Development Planning	Head of Department
			Department of Environmental Affairs and Development Planning: Development Planning	admin
			Heritage Western Cape	
Grace	Swanepoel		Western Cape Department of Transport and Public Works	
Melissa	Barker		Western Cape Government - Department of Transport and Public Works	PGWC - National
Dru	Marrheze		Western Cape Government - Department of Transport and Public Works	PGWC
Barend	du Preez		Western Cape Government - Department of Transport and Public Works	
Jacqui	Gooch		Western Cape Government - Department of Transport and Public Works	Head of Department
Malcom	Watters		Western Cape Government - Department of Transport and Public Works	
Devlin	Fortuin		Transport and Public Works: Western Cape Government	
Grace	Swanepoel		Western Cape Department of Transport and Public Works	
Vanessa	Stoffels		Western Cape Department of Transport and Public Works	Admin Clerk: Road Use Management
Celeste	Neil		Western Cape Provincial Department of Roads	
Schalk	Carstens		Western Cape Government: Road Network Management	
Malcolm	Watters		Western Cape Government: Road Network Management	
Vanessa	Stoffels		Western Cape Government: Department of Infrastructure: Road Use Management	Chief Directorate Road Planning
Phila	Mavisela		Western Cape Government - Department of Human Settlements	Head of Department
Jacqueline	Samson		Western Cape Department of Human Settlements	Head of Department (HOD)
Nathan	Andriaanse		Western Cape Government - Department of Human Settlements	Head of Communication
Margot	Ladouce		City of Cape Town: Solid Waste Management Department, Disposal Branch	
Daniel	van Jaarsveld		City of Cape Town: (Recreation & Parks)	
Ian	Gildenhuys		City of Cape Town: Air Quality Managemnt	
Brendon	Fortuin		District Roads and Stormwater (Plumstead) TDA	Head
Justin	Smit		Stormwater and Sustainability | Informal Settlements, Water & Waste Services Water and Sanitation	Acting Senior Professional Officer
			Heritage Western Cape	
Alvin L	Cape		Western Cape Government: Road Network Management	
Clifford	Dorse		Biodiversity Management Branch	
Crispin	Barrett		Spatial Planning and Environment Directorate	
Julia	Woods		Biodiversity Management Branch	
Ronelle	Clarke		Snr Environmental Professional: Areas: Environment	
Leiyaas	Brink		District Support	
Andrew	Greenwood		Environmental Management: Regional Manager	
Damian	Wentzel		Environmental Management	
Keith	Cloete		Western Cape Government: DoH	Head of Department
Waseefah	Dhansay		Heritage Western Cape: Heritage Officer	
Nelisa	Ndobeni		Department of Water Affairs (DHSWS)	
Solly	Fourie		Western Cape Government: Department of Economic Development and Tourism	Deputy Director
M	Lakay		Western Cape Government: Department of Economic Development and Tourism	
Crystal	Le Bron		Western Cape Government: Department of Economic Development and Tourism	Office of the Head of the Department
			CCT Environmental Management	Head Office
Maurietta	Stewart		CCT Environmental and Heritage Management Branch	Head: Central (Cape Town to Bellville/ Kuils River)
Sonja	Warnich-Stemmet		CCT Environmental and Heritage Management Branch	Head: North (Milnerton to Atlantis, Durbanville/Kraaifontein)
Laetitia	Paulsen		CCT Fire and Rescue Service Department	General Enquiries
Dru	Marrheze		Department of Transport and Public Works-PGWC	
Justin	Smit		CCT: Stormwater and Sustainability | Informal Settlements, Water & Waste ServicesWater and Sanitation	Acting Senior Professional Officer
Andrew	Greenwood		CCT: Environmental Management Department	Regional Manager
Damian	Wentzel		CCT: Environmental & Heritage BranchEnvironmental Management Department, Spatial Planning and Environment Directorate	Environmental Professional
Margot	Ladouce		City of Cape Town: Solid Waste Management Department, Disposal Branch	Manager and Head of Reaserch and Development
Meroline	Ockhuis		City Health: Environmental Health Specialised Services: Air Quality Management	Senior Air Quality Practitioner
Ian	Gildenhuys		City Health: Environmental Health Specialised Services: Air Quality Management	Grade 1 Environmental Management InspectorHead: Specialised Environmental Health Services
Werner	Voigt		South African National Biodiversity Institute (SANBI)	Curator
Elton	Le Roux		South African National Biodiversity Institute (SANBI)	Estate Manager
Rhett	Smart		CapeNature: Land Use Advice Unit	
WARD COUNCILLORS				
Kariena	Mare		Subcouncil 14	
Lorraine	Frost		Subcouncil Manager	
Johannes	van der Merwe		Chair person	
BUSINESSES				
			Pro Brick and block and pavers	
			QuickSILVA Burcon Plant Hire	
			Lazar	
			TAS Plastics	
			Hulse Reinforcing	
Trevor			Sizabantu piping systems Western Cape	
			Containatech (Pty)	
			Blackheath Motor Masters	
			Meshco wire products south africa	
			Goosebumps	
			Frost Logistics	
			Crush and screen	
			Mygro glass and aluminium	
			PMSA (Reef construction)	
			Asphalt king	
			Niw construction	
			Jetco SA	
SURROUNDING PROPERTIES				

Appendix I

Pre-app meeting notes

CHAND CONSULTANTS

Block A, Plum Park
St. Clair Road,
Plumstead
7800

TEL: 021 762 3050
E-MAIL: info@chand.co.za

KHULANI ENERGY WASTE MANAGEMENT FACILITY, BLACKHEATH, CITY OF CAPE TOWN

Date: 17 July 2024

Time: 15h10 – 16h10

Venue: Online

Topic: Pre-application meeting

Meeting Attendees:

Full Name	Role	Organisation	Abbreviation
Attendees:			
Mr. Lawrence Tsolo	Applicant	Khulani Energy	LT
Ms. Nombulelo Ntulini	Applicant	Khulani Energy	NN
Ms. Michelle Lee	Environmental Consultant	Chand Consultants (Chand)	ML
Mr Lucas Mhlangu	Waste Management Case Officer	Department of Forestry, Fisheries and the Environment	LM
Apologies			
None			

Agenda:

	Item	Lead
1	Welcome	Chand
2	Proposed Facility Expansion	Chand and Khulani Energy
3	Description of Waste Materials	Chand and Khulani Energy
4	Applicability to National Legislation	Chand and Khulani Energy
5	Way Forward	All

1. Welcome

- ML opened the meeting with a round of introductions.
- ML explained the purpose of the meeting: to discuss the proposed expansion of the Khulani Energy waste management facility and outline the regulatory

requirements for a Waste Management Licence (WML) application under the National Environmental Management: Waste Act (NEM:WA).

2. Proposed Facility Expansion

- ML advised that Khulani Energy currently collects, receives, and stores waste oil. Waste oil is stored in impermeable tanks on-site for up to two weeks before being transported to a disposal facility. Two 25,000L tanker trucks are used for transportation.
- ML noted the facility is registered in terms of the National Norms and Standards for the Storage of Waste.
- ML advised the facility aims to expand its operations through the inclusion of the treatment and disposal of wastewater and waste oil on-site. Additional services would include sludge removal, wastewater sump and drain cleaning, 24-hour spill response, and machinery installation/maintenance.
- LT advised on the waste management process, noting that waste would be collected and transported in ~25,000-liter trucks and offloaded into bunded storage tanks near the central parking area. The waste would undergo a settling period of 1 to 14 days, allowing solids to separate from liquids. The resulting sludge would then be removed and sent to a licensed disposal facility. Liquid waste would be pumped into heating tanks, circulated through a boiler, and processed in a separator to extract oil, sludge, and wastewater. Thereafter, wastewater would be treated with lime for flocculation, then tested for compliance with municipal discharge standards. Non-compliant water would be diverted to quarantine tanks for manual chemical dosing using agents.
- LT advised that recovered oil would be reused on-site or sold as burner fuel, with excess disposed of safely. Sludge would either be recycled in the process or taken to a licensed hazardous facility.
- ML advised that The site will store ~30,000 litres of oil and sludge, and ~200,000 litres of treated water at any time.
- ML advised that to realise the expansion would entail construction of a concrete bund for tank storage, laying of a concrete foundation, the installation of a boiler and the installation of the various tanks and pipes.

3. Applicability to National Legislation

- ML advised that the proposed expansion would trigger a Category A waste management activity in terms of the National Environmental Management: Waste Act (Act No. 59 of 2008). This is due to the inclusion of activities such as the recycling of hazardous waste, the recycling of general waste at a facility exceeding 500m² in size, the treatment of general waste in volumes greater than 10 tons but less than 100 tons per day, and the treatment of hazardous waste in quantities exceeding 500 kilograms but less than 1 ton per day.
- ML requested clarification on if the proposed processing method qualifies as organic treatment.
- LM advised that the if the proposed processing method does not qualify as organic treatment.
- LM confirmed that greywater mixed with oil and fuel is classified as hazardous waste and thus requires a waste management licence prior to the facility expanding and operating.
- LM cautioned LT and NN on pursuing Category A basic assessment process as should the facility want further expansion then an amendment to the license would be required. LM highlighted that should the facility exceed its license thresholds a fine of up to R10 million could be enforced by the Department for non-compliance with license conditions.
- LT noted the comment and advised that in the interests of compliance and future expansion, a Scoping and EIA process would be followed.
- ML requested clarification on the need for specialists, advising that the facility is located within a completely urban and transformed area with no environmental sensitivities or natural features in close proximity.
- LM confirmed that no specialists' studies would be required for the proposed activities.

4. Way forward

- LT and NN confirmed that the submission of a Scoping Report and Environmental Impact Assessment as part of the WML application process would be undertaken.

- LM advised that the Public Participation Process must follow the requirements as set out in the National Environmental Waste Act and EIA Regulations (as amended).

6. Close of Meeting

- ML thanked all attendees for joining the meeting and their participation.

The meeting was closed at 16:10

Appendix J

Application Form

forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

APPLICATION FORM FOR WASTE MANAGEMENT LICENCE

NB: PLEASE TAKE NOTE: In compliance with section 24H of NEMA, 2017 as amended, you are required to provide the following:

EAPASA REGISTRATION NUMBER :

and ATTACH PROOF OF REGISTRATION

Failure to comply, your application will automatically be rejected, effective from the 08 August 2022

Application for authorisation in terms of the National Environmental Management: Waste Act, 2008(Act No.59 of 2008), as amended and the Environmental Impact Assessment Regulations, 2017, as amended

NB: PLEASE TAKE NOTE: ***Should your activity(ies) include "Storage of general or hazardous waste in a lagoon; Disposal of Inert or general or Hazardous waste to land", please ensure that you complied with all the requirements of the attached checklist (APPENDIX 1) when submitting the Final Report (BAR or EIR) for the processing of RoD by DWS.***

COMMENCEMENT: Has the activity (ies) commenced: ~~Yes~~ or No

If yes, When (provide the Year, Month and Date):

N/A		

PROJECT TITLE

KHULANI ENERGY WASTE MANAGEMENT FACILITY, BLACKHEATH, CITY OF CAPE TOWN

PROJECT DESCRIPTION

Khulani Energy and Plant Maintenance (Pty) Ltd is proposing to expand its existing waste management facility to enhance its capacity for the receipt, storage, treatment, and disposal of wastewater and waste oil to expand and optimise their service offering. The facility is currently operational on a small scale and is registered under the National Norms and Standards for the Storage of Waste, as promulgated by the National Environmental Management: Waste Act (Act 59 of 2008).

Proposed Expansion

The proposed expansion will necessitate additional infrastructure and processing capacity to accommodate increased volumes of waste material.

The expanded facility will provide the following waste management services:

- Collection and transport of wastewater and waste oil;
- Treatment and disposal of wastewater and waste oil;
- Sludge removal;
- Wastewater disposal sump and drain cleaning;
- 24-hour spill response services; and
- Installation and maintenance of machinery, including pump services, pump installation, and welding.

- The waste material proposed for processing at the facility includes:
- Waste oil – Emanating from vehicle and ship cleaning, fat/grease traps, and manufacturing facilities (e.g., sunflower oil processing plants).
- Wastewater – Predominantly greywater sourced from ships docking at the local harbour, which has been previously used for cleaning, bathing, and recreational activities.
- Petrol and diesel – Minor quantities of petrol and diesel may be received.

It is anticipated that a maximum of approximately 184,000 Liters of waste material will be stored on-site at any given time.

The proposed expansion of the waste management facility aims to provide wastewater and waste oil treatment processes while ensuring compliance with environmental regulations. The waste handled by the facility constitutes hazardous waste and the expansion will require a Waste Management License due to increased hazardous waste processing capacity.

Process Description

The waste management process begins with the collection and transportation of waste materials using ~25,000-liter trucks. Upon arrival at the facility, the waste solution will be offloaded into bunded storage tanks located adjacent to a designated internal central parking area. The waste treatment process will commence with 1 to 14 days of settling to allow solids to separate from liquids via gravity. The settled solid waste or 'sludge' will be removed from the tank and disposed of to a licensed disposal facility. The liquid waste material will be pumped from the storage tanks into heating tanks via above-ground pipelines, circulated through a boiler system, and then directed into a separator to extract oil, sludge, and wastewater from each other.

Thereafter, the wastewater will undergo flocculation treatment in lime tanks to remove contaminants before being transferred to dedicated treatment tanks for quality testing to ensure compliance with municipal discharge standards. Non-compliant wastewater will be diverted to designated quarantine tanks for further chemical treatment via manual chemical dosing until it meets the municipal discharge requirements, after which it will be released into the municipal sewer network. The chemicals used in this quarantine dosing stage include:

- **Sodium hydroxide** - Sodium hydroxide (NaOH), a strong alkaline compound, plays a critical role in wastewater treatment processes, particularly in pH neutralization and odour control. Its primary function is to raise the pH of acidic wastewater streams, thereby facilitating the neutralization process. Maintaining a balanced pH is essential for protecting aquatic ecosystems, ensuring regulatory compliance, and optimizing the performance of downstream biological and chemical treatment processes. Beyond pH adjustment, sodium hydroxide contributes to the control of odorous emissions. By increasing the pH, it can suppress the release of volatile acidic gases such as hydrogen sulfide (H_2S), which are responsible for foul

odours commonly associated with wastewater facilities. This makes sodium hydroxide a commonly used agent not only for its effectiveness in neutralization but also for its dual benefit in mitigating environmental nuisances.

- **Sulfuric Acid** - Sulfuric acid (H_2SO_4) is widely used in water and wastewater treatment, primarily for lowering pH in alkaline effluents. It is the most commonly used acid globally due to its effectiveness and availability. In addition to pH adjustment, sulfuric acid has demonstrated strong bactericidal properties. A study published in the *Journal of Water Research* found it capable of killing over 99% of tested waterborne bacteria, making it useful for both pH control and microbial disinfection.
- **Citric Acid** - Citric acid is a weak organic acid commonly used in water treatment for its natural chelating properties. It effectively binds to metal ions, making it useful for softening water and removing limescale from boilers, evaporators, and other equipment. As a biodegradable and non-toxic substance, it offers an environmentally friendly alternative for scale control and system maintenance in both industrial and domestic settings.
- **Chlorine Dioxide -** Chlorine dioxide is a compound widely used as a disinfectant in water treatment, particularly for drinking water. It is highly effective at eliminating bacteria, viruses, and other pathogens. When applied in carefully controlled, low concentrations, it is considered safe and does not pose health risks. Similar to bleach in its disinfecting action, chlorine dioxide is valued for its potency and ability to maintain residual disinfection throughout water distribution systems.
- **Calcium Hydroxide -** Calcium hydroxide (hydrated lime) and its related compound, calcium oxide (quicklime), are commonly used in water treatment to raise the pH of raw water prior to coagulation and flocculation. By increasing alkalinity, these substances enhance the effectiveness of coagulants such as alum or ferric sulfate, improving the removal of suspended particles and impurities during treatment.

Other chemicals that may be used within the quarantine manual dosing include:

- **Aluminum Sulfate (Alum) -** Aluminum sulfate is widely used in water purification and wastewater treatment for chemical phosphorus removal and coagulation. It causes fine suspended particles to clump together into larger aggregates (flocs), which can then be removed by sedimentation or filtration.
- **Calcium Hypochlorite -** Calcium hypochlorite is an inorganic disinfectant commonly added to water in granular or tablet form. It effectively kills harmful pathogens, making it a key agent in safeguarding public health in both drinking water and wastewater applications.
- **Polyaluminum Chloride (PAC) -** PAC is one of the most efficient coagulants used in water and wastewater treatment. It offers superior coagulation performance across a wide pH and temperature range, making it suitable for diverse treatment conditions. It is frequently preferred over traditional coagulants like alum due to its higher efficiency and lower sludge production.
- **Sodium Chloride -** Sodium chloride, or common salt, is primarily used in water softening systems. In brine solutions, it regenerates ion-exchange resins by replacing hard water minerals such as calcium and magnesium with sodium ions.
- **Potassium Chloride -** Potassium chloride is an alternative to sodium chloride in water softeners. It regenerates the resin similarly but replaces hard water ions with potassium, a nutrient that can be beneficial in small quantities in drinking water.

- **Phosphoric Acid -** Phosphoric acid (H_3PO_4), also known as orthophosphoric acid, is used in wastewater treatment to aid in the removal of pollutants. It is a non-toxic, essential mineral acid that also serves to control corrosion in water systems by forming protective phosphate films on pipe surfaces.
- **Hydrochloric Acid -** Hydrochloric acid is a strong acid used primarily to lower the pH of industrial wastewater and for cleaning purposes. It also serves as an effective emulsion breaker and scale remover, making it valuable in treatment systems handling high pH or mineral-rich effluents.

The extracted waste oil will either be sold as biofuel/burner fuel or used onsite to power the oil boiler system. Any excess oil that cannot be utilized or sold will be safely disposed of at a licensed hazardous waste management facility.
Sludge byproducts will be reintegrated into the treatment process as described above. Any sludge that cannot be further processed will be disposed of at a licensed hazardous landfill or waste treatment facility.

The estimated storage capacities will include ~30,000 Liters of waste oil and sludge and ~200,000 Liters of treated wastewater stored on-site at any given time.

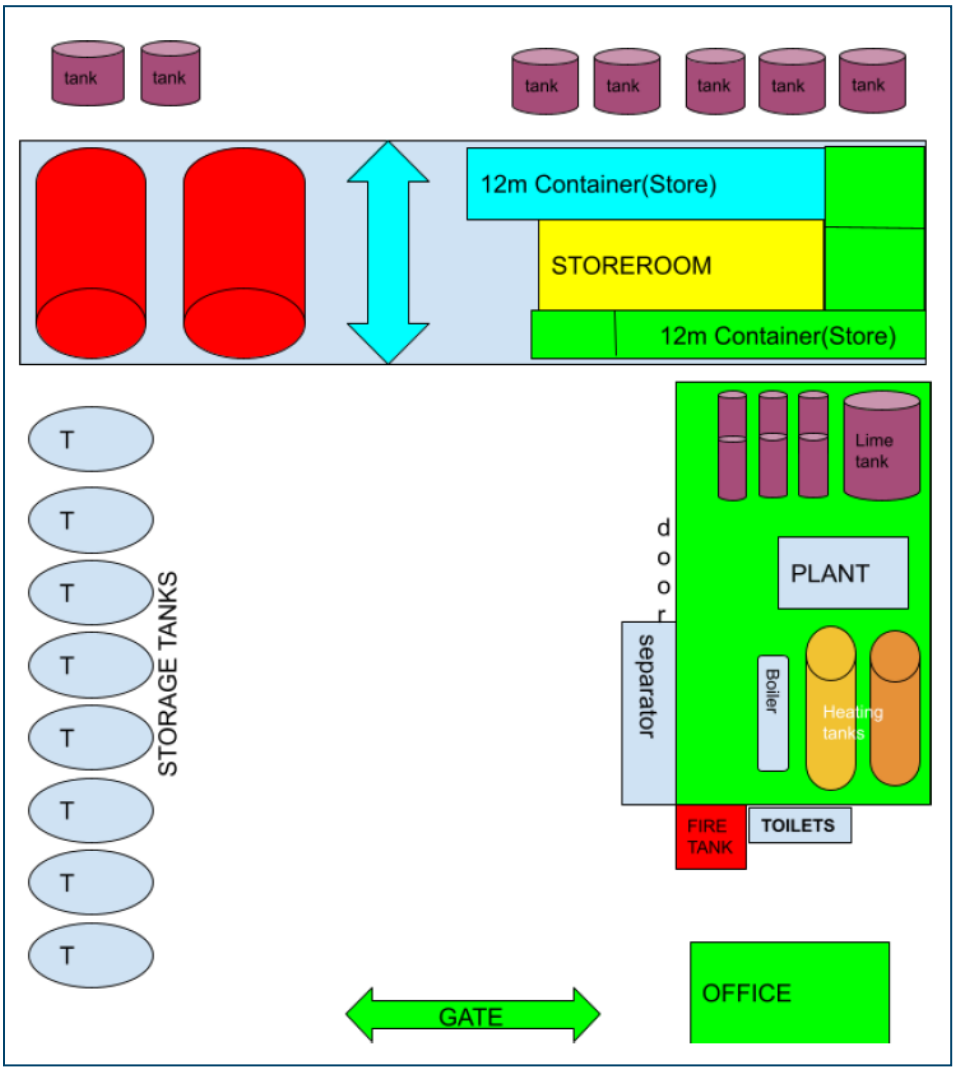


Figure 1. Layout diagram of the proposed expanded facility

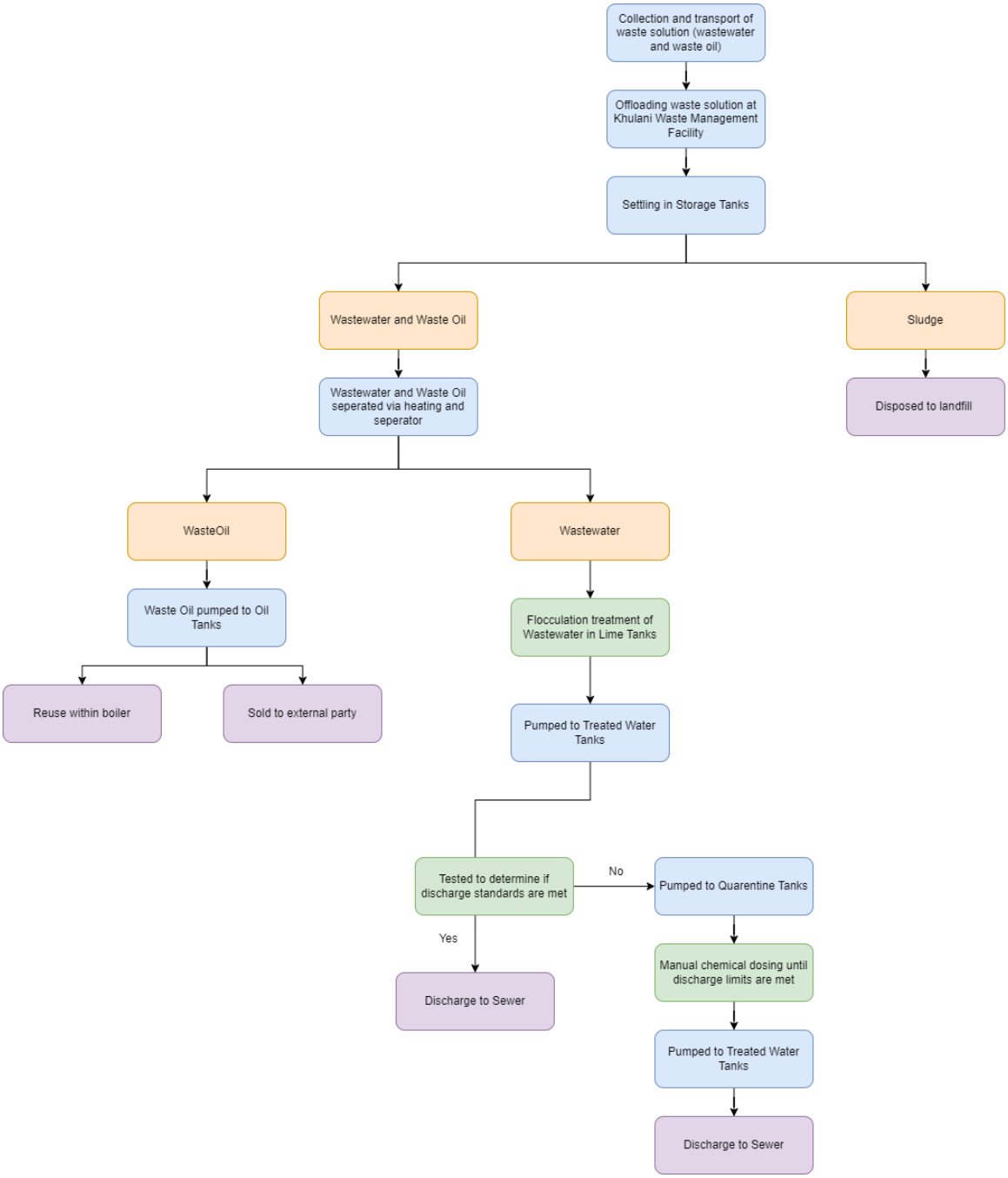


Figure 2. Process diagram of the proposed expanded facility

Kindly note that:

1. This application form is current as of 22 February 2023. It is the responsibility of the applicant to ascertain whether subsequent versions of the form have been published or produced by the competent authority.

2. The application must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Spaces are provided in tabular format and will extend automatically when each space is filled with typing.

3. Where applicable **black out** the boxes that are not applicable in the form.

4. Incomplete applications may be returned to the applicant for revision.

5. The use of the phrase “not applicable” in the form must be done with circumspection. Should it be done in respect of material information required by the competent authority for assessing the application, it may result in the rejection of the application as provided for in the Regulations.

6. This application must be handed in at the offices of the relevant competent authority as determined by the Act and regulations.

7. Unless protected by law, all information filled in on this application will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this application on request, during any stage of the application process.

8. Should a specialist report or report on a specialised process be submitted at any stage for any part of this application, the terms of reference for such report must also be submitted.

9. The payment of a fee for the processing of environmental impact assessment applications in terms of sections 24(5)(c), 24M and 44 the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) will be applicable from July 2012.

Queries must be addressed to the contact hereunder:

Departmental Details

Postal address:
Department of Environment, Forestry and Fisheries
Attention: Director: Licensing
Private Bag X447
Pretoria
0001

Physical address:
Department of Environment, Forestry and Fisheries
Environment House (473 Steve Biko Rd, corner:Steve Biko and Soutpansberg Rds)
Arcadia X6
PRETORIA
0002

Application queries should be directed to the Sub-Directorate: Waste Licensing Systems Management on:

Tel :012 3999791: Email: lmahlangu@dffe.gov.za

FEES[1]

Department of Environment, Forestry and Fisheries details for the payment of application fees

Banking details:
ABSA Bank
Branch code: 632005
Account number: 1044 2400 72
Current account
Reference number :Waste License (important to quote this when making payment)

Attach proof of payment to this Application form:

Payment Enquiries:
Contact person: Lucas Mahlangu

[1]Applicants must pay a fee for the processing of environmental impact assessment in terms of sections 24(5)(c), 24M and 44 the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). A flat rate of **R2 000** is charged for basic assessment (BA), transfer of Ownership and Renewal of validity of WML and **R10 000** for scoping and an environmental impact assessment applications (Scoping EIA)

Tel: 012 3999 791: Email: lmahlangu@dffe.gov.za

Tax exemption status:
Status: Tax exempted

Exclusions:

An applicant is excluded from paying fees if:

- The activity is a community based project funded by a government grant; or
- The applicant is an organ of state.

Applicants are required to tick the appropriate box below and ensure that the application form is accompanied by proof of payment OR proof and motivation if an exclusion applies:

Proof attached ☑

Exclusion ☐ applies

Type of exclusion	**Tick which exclusion is applicable. Proper motivation must be provided if any option is chosen.**
The activity is a community based project funded by a government grant	N/A
The applicant is an organ of state. Including SOCs	N/A

SITE IDENTIFICATION AND LINKAGE

Please indicate all the Surveyor-general 21 digit site (erf/farm/portion) reference numbers for all sites (including portions of sites) that are part of the application.

C	0	6	7	0	0	0	2	0	0	0	0	0	7	9	8	0	0	0	0	0

(if there are more than 6, please attach a list with the rest of the numbers)
(These numbers will be used to link various different applications, authorisations, permits etc. that may be connected to a specific site)

SITE CO-ORDINATES

Please provide the geographic co-ordinates of all corners of the site; in degrees, decimal minutes, and seconds for all sites (Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site). Provide geographic coordinates for all corners of the facility (ies)

Corner Number	Latitude			Longitude		
1	33°	57'	32.52"	18°	41'	38.78"
2	33°	57'	32.50"	18°	41'	37.80"
3	33°	57'	34.01"	18°	41'	37.25"
4	33°	57'	34.21"	18°	41'	38.27"

SITE AND LOCALITY PLAN DIRECTIONS

The proposed expansion of the existing Khulani Waste Management facility is located on Erf 798 at 14 Helene Avenue in Blackheath, within the City of Cape Town, Western Cape. The property measures approximately 1,300.4m². It is situated.

The central coordinates of the property are 33°57'33.39"S and 18°41'37.96"E. The site falls under the jurisdiction of the City of Cape Town Municipality and is part of the greater Cape Town metropolitan area.

Figure 3. Locality Map (created using Google Earth Pro, 2025)

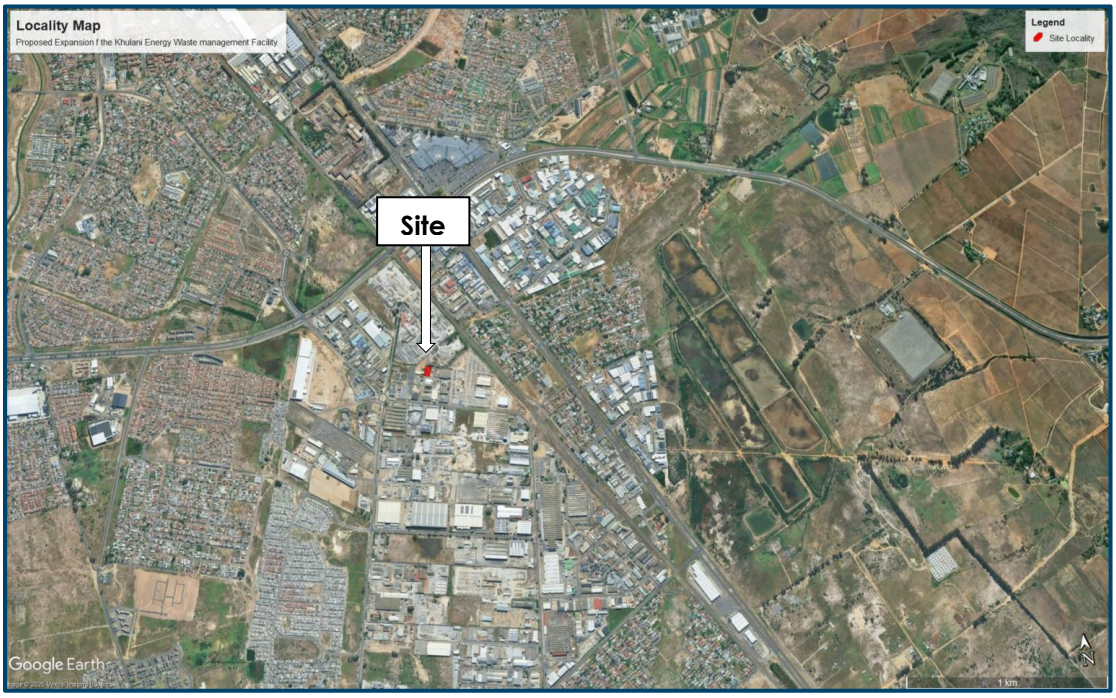


Figure 4. 1km Scale Locality Map (created using Google Earth Pro, 2025)

CAPITAL VALUE AND JOB CREATION ESTIMATES (If applicable)

Capital value	Job estimates
Total Capital Value: ~R6,897,792.00.	Construction Phase ~5 Jobs
	Operational Phase: 15 permanent jobs

PROJECT TITLE

KHULANI ENERGY WASTE MANAGEMENT FACILITY, BLACKHEATH, CITY OF CAPE TOWN

1. BACKGROUND INFORMATION

Project applicant:	Lawrence Sipho Tholo
Trading name (if any):	Khulani Energy and Plant Maintenance (Pty) Ltd
Contact person:	Lawrence Sipho Tholo
Physical address:	14 Helene Avenue, Blackheath, Cape Town
Postal address:	14 Helene Avenue, Blackheath, Cape Town

Postal code:	7581	Cell:	0849605961
Telephone:	N/A	Fax:	N/A
E-mail:	lawrence@khulanienergy.co.za		
Provincial Authority:	Department: Environmental Affairs and Development Planning: Waste Management		
Reference No. (if any)	N/A		
Contact person:	Lance Mcbain-Charles		
Postal address:	6th Floor Property Centre, 3 Dorp Street, Cape Town		
Postal code:	8001	Cell:	(0)73 185 9981
Telephone:	(0)21 483 2747	Fax:	(0)21 483 3200
E-mail:	Lance.McBain-Charles@westerncape.gov.za		

EAP Company	Chand Consultants		
Contact person:	Ingrid Eggert (EAPASA Reg: 2019/805)		
Postal address:	Block A, Plum Park, 4 St. Clair Road, Plumstead, Cape Town		
Postal code:	7800	Cell:	N/A
Telephone:	021 762 3050	Fax:	N/A
E-mail:	info@chand.co.za		

Landowner:	Lawrence Sipho Tholo		
Contact person:	Same as above		
Postal address:	14 Helene Avenue, Blackheath, Cape Town		
Postal code:	7581	Cell:	0849605961
Telephone:	N/A	Fax:	N/A
E-mail:	lawrence@khulanienergy.co.za		

In instances where there is more than one landowner, please attach a list of landowners with their contact details to this application.

Local authority in whose jurisdiction the proposed activity will fall:	The City of Cape Town		
District authority in whose jurisdiction the proposed activity will fall:	N/A		
Nearest town or districts:	Cape Winelands District Municipality		
Contact person:	Wilhelm Markus		
Postal address:	46 Alexander Street, P.O. Box 100, Stellenbosch		
Postal code:	7599	Cell:	N/A
Telephone:	0218885100	Fax:	N/A
E-mail:	admin@capewinelands.gov.za		

In instances where there is more than one local authority involved, please attach a list of local authorities with their contact details to this application.

N/A

2. ACTIVITIES APPLIED FOR TO BE AUTHORISED

2.1 For an application for authorisation that involves more than one listed or specified activity that, together, make up one development proposal, all the listed activities pertaining to this application must be indicated.

Indicate the number and date of the relevant notice:	**Activity No (s) (in terms of the relevant notice) :**	**Describe each listed activity as per project description[2]:**	**Process indicated by regulations (Scoping or Basic Assessment)**
e.g. GN 921 of 2013	A(1)	Storage of general waste in lagoons	Basic Assessment
Government Notice 921 of 29 November 2013, as amended	Category A – Activity 5	The recovery of waste including the refining, utilisation, or co-processing of waste in excess of 10 tons but less than 100 tons of general waste per day or in excess of 500 kg but less than 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.	Basic Assessment
Government Notice 921 of 29 November 2013, as amended	Category A – Activity 7	The treatment of hazardous waste using any form of treatment at a facility that has the capacity to process in excess of 500 kg but less than 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment	Basic Assessment
Government Notice 921 of 29 November 2013, as amended	Category B – Activity 3	The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.	Scoping and EIA

[2]Please note that this description should not be a verbatim repetition of the listed activity as contained in the relevant Government Notice, but should be a brief description of activities to be undertaken as per the project description

Government Notice 921 of 29 November 2013, as amended	Category B – Activity 4	The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment.	Scoping and EIA

Please note that any authorisation that may result from this application will only cover activities specifically applied for.

2.2 Please indicate what process will be followed:

Basic assessment: ~~Yes~~/**No** S&EIR:**Yes**/~~No~~

2.3 Attach permission to upgrade/downgrade if requested and obtained

2.4 Indicate the proposed project schedule / timeline

EAP Activity	Opportunities for Participation		Anticipated Schedule
	Competent Authority	I&APs	
Submission of the Application Form	X		June 2025
Submission of the Draft Scoping Report	X	X	June 2025
Public Participation Process	X	X	June/July 2025
Submission of Final Scoping Report	X		August 2025
Notify I&APs of DFFE decision on Scoping Report		X	September 2025
Compile Draft EIR and EMPr	-	-	September 2025
Submission of Draft EIR to DFFE	X	-	September 2025
Public Participation Process	X	X	September/October 2025
Collate and respond to comments and finalize EIR	-	-	October 2025
Submit Final EIR to DFFE	-	-	October/November 2025
DFFE decision-making (107 days).	WML Granted/Refused	-	November/December 2025
Notify registered I&APs of decision (within 14 days of date of decision)	-	-	December 2025
EAP to provide information on appeal	Consultation during processing	Opportunity to appeal decision	December 2025

process as and when required.	of appeal if relevant.	in terms of National Appeal Regulations, 2014	

3. OTHER AUTHORISATIONS REQUIRED

3.1 DO YOU NEED ANY AUTHORISATIONS IN TERMS OF ANY OF THE FOLLOWING LAWS?

3.1.1 National Environmental Management Act ~~Yes~~/**No**
3.1.2 National Environmental Management: Air Quality Act ~~Yes~~/**No**
3.1.3 National Environmental Management: Protected Areas Act ~~Yes~~/**No**
3.1.4 National Environmental Management: Biodiversity Act ~~Yes~~/**No**
3.1.5 National Environmental Management: Integrated Coastal Management Act[3] ~~Yes~~/**No**
3.1.6 National Water Act ~~Yes~~/**No**
3.1.7 National Heritage Resources Act ~~Yes~~/**No**
3.1.8Mineral Petroleum Development Resources Act ~~Yes~~/**No**
3.1.9 Other (please specify) ~~Yes~~/**No**

3.2 Have such applications been lodged already? ~~Yes~~/**No**
If Yes, please attach the application and provide a status update.

4. SECTORS

Please indicate, by marking the appropriate box below, the sector and sub-sector applicable to the main development which forms the subject of this application:

Sector 1: Energy infrastructure	

Subsector 1.1: Green economy + 'green' and energy saving industries	Subsector 1.5: Nuclear
Subsector 1.2: Infrastructure – electricity (generation, transmission & distribution)	Subsector 1.6: Basic services (local government) - electricity and electrification
Subsector 1.3: Oil and gas	Subsector 1.7: Basic services (local government) - area lighting
Subsector 1.4: Biofuels	

Sector 2: Transport infrastructure	

[3]Where an environmental authorization in terms of chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority must take into account all the relevant factors including those listed in section 63(1) of the National Environmental Management:Integrated Coastal Management Act.

Subsector 2.1: Infrastructure-transport (ports, rail and road)	
Subsector 2.2: Basic services (local government) access roads)	
Subsector 2.3: Basic services (local government) - public transport	

Sector 3: Bulk services infrastructure	✓

Subsector 3.1:Infrastructure - water (bulk and reticulation)	
Subsector 3.2: Basic services (local government) - sanitation	
Subsector 3.3: Basic services (local government) -waste management	✓
Subsector 3.4: Basic services (local government) water	

Sector 4: Water impoundments	

Subsector 4.1:. Basic services (Local Government) water	

Sector 5: Agriculture and forestry (including agri-industry, etc)	

Subsector 5.1: Agricultural value chain + agro-processing (linked to food security and food pricing imperatives)	
Subsector 5.2: Forestry, paper, pulp and furniture	

Sector 6: Communication infrastructure	

Subsector 6.1: 1 Infrastructure - information and communication technology	

Sector 7: Recreation and hospitality industry related infrastructure	

Subsector 7.1: Tourism+ strengthening linkages between cultural industries & tourist	

Subsector 7.2: Basic services (local government) - public open spaces and recreational facilities	

Sector 8Greenfield transformation to urban or industrial form(including mining)	

Sector 9: Biodiversity or sensitive area related activities	

Sector 10: Other services	

Subsector 10.1:Mining value chain	Subsector 10.8:Business process servicing
Subsector 10.2:Potential of metal fabrication capital & transport equipment - arising from large public investments	Subsector 10.9: Advanced materials
Subsector 10.3: Boat building	Subsector 10.10:Aerospace
Subsector 10.4: Manufacturing - automotive products and components, and medium and heavy commercial vehicles	Subsector 10.11: Basic services(Local Government) Education
Subsector 10.5: Manufacturing- plastics, pharmaceuticals & chemicals	Subsector 10.12:Basic services(Local Government)- health
Subsector 10.6: Manufacturing – clothing textiles, footwear & leather	Subsector 10.13: Basic services(Local Government) Housing
Subsector 10.7: Forestry, paper , pulp & furniture	Subsector 10.14:Basic services (Local Government) security of tenure
	Subsector 10.15: Other

forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Ref No: 12/9/11/L250722125434/9/N/Khulani Energy Waste Management
Enquiries: Mr Lucas Mahlangu
Tel: (012) 399 9791. **Email:** LMahlangu@dffe.gov.za
www.dffe.gov.za

Chand Consultants
P O Box 238
Plumstead
Cape Town
7801

Email : sabrina@chand.co.za

Dear Sabrina Thorndike

APPLICATION FOR WASTE MANAGEMENT LICENCE IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT, 2008 (NO. 59 OF 2008): PROPOSED RECOVERY AND TREATMENT FOR KHULANI ENERGY WASTE MANAGEMENT FACILITY, LOCATED AT ERF 798 AT 14 HELENE AVENUE IN BLACKHEATH, CITY OF CAPE TOWN, WESTERN CAPE PROVINCE.

The Department confirms having received your waste management licence application form for the abovementioned activities on the 22 July 2025.

You are hereby reminded to comply with the requirement: Regulations 45 of GN No. R982 regarding the period allowed for complying with the requirements of the regulations, and Regulation 41, 43 and 44 of GN No. R982 with regard to the allowance of commenting period for interested and affected parties on all reports submitted.

Your application has been assigned with a reference number (**12/9/11/L250722125434/9/N/Khulani Energy Waste Management**). Kindly quote this reference number in any future correspondence in respect of your application. The responsible officer for the processing of your application is **Ms. Bongani Mabunda who can be contacted on (012) 399 9568/064 880 8731 or BMabunda@dffe.gov.za.**

APPLICATION FOR WASTE MANAGEMENT LICENCE IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT, 2008 (NO. 59 OF 2008): PROPOSED FOR RECOVERY AND TREATMENT, LOCATED AT ERF 798 AT 14 HELENE AVENUE IN BLACKHEATH, CITY OF CAPE TOWN, WESTERN CAPE PROVINCE.

The activity must not commence prior to a Waste Management License being granted by the Department.

Should you require further detailed information, please do not hesitate to contact this office.

Yours sincerely

Mr. Matjelele Phaladi
Directorate Licensing
Signed by: Mr. Lucas Mahlangu
Designation: Control Environmental Officer Grade B
Date: 22 July 2025

Appendix K

EAP Declaration

6. The independent Environmental Assessment Practitioner

I, **Ingrid Eggert**, declare under oath that I –

- act as the independent environmental assessment practitioner in this application;
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2010;
- have and will not have no vested interest in the proposed activity proceeding;
- have no, and will not engage in, conflicting interests in the undertaking of the activity;
- undertake to disclose, to the competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the Environmental Impact Assessment Regulations, 2006;
- will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;
- will keep a register of all interested and affected parties that participated in a public participation process; and
- will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.

Signature of the Environmental Assessment Practitioner:

Chand Environmental and Sustainability Consultants

Name of company:

04 June 2025

Date:

A.L PEDRO

7145939-7 W/O

ALISON LYNN PEDRO

Signature of the Commissioner of Oaths:

04 June 2025

Date:

Warrant Officer

Designation:

Official stamp (Above)

SOUTH AFRICAN POLICE SERVICE
FORENSIC SCIENCE LABORATORY
WESTERN CAPE
04 JUN 2025
PLATTEKLOOF
SUID AFRIKAANSE POLISIEDIENS

Appendix L

Applicant Declaration

5. DECLARATIONS

5.1 The Applicant

I, Lawrence Thelo , declare that I -

Commented [ST2]: Lawrence: Please sign under oath

- am, or represent[4], the applicant in this application;
- have appointed / will appoint(delete that which is not applicable) an environmental assessment practitioner to act as the independent environmental assessment practitioner for this application / will obtain exemption from the requirement to obtain an environmental assessment practitioner[5];
- will provide the environmental assessment practitioner and the competent authority with access to all information at my disposal that is relevant to the application;
- will be responsible for the costs incurred in complying with the Environmental Impact Assessment Regulations, 2010, including but not limited to –
  - costs incurred in connection with the appointment of the environmental assessment practitioner or any person contracted by the environmental assessment practitioner;
  - costs incurred in respect of the undertaking of any process required in terms of the Regulations;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the Regulations;
  - costs in respect of specialist reviews, if the competent authority decides to recover costs; and
  - the provision of security to ensure compliance with conditions attached to an environmental authorisation, should it be required by the competent authority;
- will ensure that the environmental assessment practitioner is competent to comply with the requirements of these Regulations and will take reasonable steps to verify whether the EAP complies with the Regulations;
- will inform all registered interested and affected parties of any suspension of the application as well as of any decisions taken by the competent authority in this regard;
- am responsible for complying with the conditions of any environmental authorisation issued by the competent authority;
- hereby indemnify the Government of the Republic, the competent authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action which the applicant or environmental assessment practitioner is responsible for in terms of these Regulations;
- will not hold the competent authority responsible for any costs that may be incurred by the applicant in proceeding with an activity prior to obtaining an environmental authorisation or prior to an appeal being decided in terms of these Regulations;
- will perform all other obligations as expected from an applicant in terms of the Regulations;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 71 and is punishable in terms of section 24F of the Act.

[4]If this is signed on behalf of the applicant, proof of such authority from the applicant must be attached.
[5]If exemption is obtained from appointing an EAP, the responsibilities of an EAP will automatically apply to the person conducting the environmental impact assessment in terms of the Regulations.

Signature of the applicant[6] / Signature on behalf of the applicant:

Khulani Energy And Plant Maintenance

Name of company (if applicable):

09/06/2025

Date:

Signature of the Commissioner of Oaths:

2025-06-09

Date:

Constable

Designation:

Official Stamp

SUID-AFRIKAANSE POLISIE DIENS
SAPS MFULENI
09 JUN 2025
SOUTH AFRICAN POLICE SERVICE

[6] If the applicant is a juristic person, a signature on behalf of the applicant is required as well as proof of such authority. An EAP may not sign on behalf of an applicant.