

SUMMARY OF THE PUBLIC PARTICIPATION PROCESS

PROPOSED ABATTOIR COMPOST FACILITY AND FEEDLOT ON PORTION 6 OF FARM MIDDELBURG 10, ROBERTSON

DEA&DP: DEVELOPMENT MANAGEMENT REFERENCE NR: 16/3/3/1/B1/14/1004/18

DEA&DP: WASTE MANAGEMENT REFERENCE NR: 19/2/5/1/B1/14/WL0003/18

This section of the report is included in compliance with the Regulations. Public participation is an integral part of the EIA process, and affords potentially interested and potentially affected parties (I&APs) an opportunity to participate in the EIA process, or to comment on any aspect of the development proposals.

Other relevant considerations regarding the public participation process being undertaken for this project are that:

- The public participation process being undertaken for this project complies with the requirements of the Regulations.
- The description of the public participation process included in Sections below itemises the steps and actions undertaken.

An Advert was placed in the following newspapers:

- Local Paper: The Langeberg Bulletin, on the 03 March 2017.
- Provincial Paper: Die Burger, on the 03 March 2017.

The notice boards were placed on site from 16 March 2017.

Six (6) notices were sent via registered mail on 23 February 2017 and an additional six (6) notices were sent via registered mail on 13 July 2017 to owners and occupiers of land adjacent to the site where the activity is undertaken. The notice requested them to register as Interested and Affective Parties (I&APs) and invited them to provide written comments together with the above reference number, their name, contact details and an indication of any direct business, financial, personal or other interest which they have in the application to the contact person indicated below within 30 days from the date of this notice. The notice also requested the owner to inform all persons residing on the property. The notice was provided to owners and occupiers in English.

The Pre-Application Basic Assessment Report was sent to the following key Departments:

- Breede-Gouritz Catchment Management Agency
- Cape Winelands District Municipality
- CapeNature
- Central Breede River Water User Association (Robertson)
- DEA&DP: Air Quality Management
- DEA&DP: Pollution Management
- DEA&DP: Waste Management
- Department of Agriculture: Western Cape
- Department of Health: Western Cape
- Heritage Western Cape
- Langeberg Local Municipality

The Draft Basic Assessment Report will be sent to the following Departments:

- Breede-Gouritz Catchment Management Agency
- Cape Winelands District Municipality
- CapeNature
- Central Breede River Water User Association (Robertson)
- Eskom (Western Cape)
- DEA&DP: Air Quality Management

- DEA&DP: Pollution Management
- DEA&DP: Waste Management
- Department of Agriculture: Western Cape
- Department of Health: Western Cape
- Heritage Western Cape
- Langeberg Local Municipality
- Western Cape Department of Transport and Public Works: Road Network Management

STEPS TAKEN TO NOTIFY POTENTIALLY INTERESTED AND AFFECTED PARTIES

This section of the report is included in compliance with the Regulations.

Potential I&APs were notified about the project by:

1. Fixing a notice board at the boundary of the site in compliance with the Regulations. All relevant and required information was displayed on the notice board. The notice board contained the following minimum information (Size of Board 70 x 50 cm):
 - how to register as an interested and affected party;
 - the manner in which representations on the application may be made;
 - where further information on the application or activity can be obtained; and
 - the contact details of the person(s) to whom representations may be made.

The fact that the public participation process had commenced, that a basic assessment process will be followed, the dates within which they can register or send comments and what the proposed activity constituted, was displayed.

Photos of the notice board are included. The notice board was placed on site from the 16 March 2017.

2. Giving written notice to owners and occupiers of land adjacent to the site where the activity is to be undertaken, the municipal councillor of the ward within which the site is located, the local municipality and those organs of state having jurisdiction in respect of any aspect of the project as required by the Regulations.

Owners and occupiers of land adjacent to the site was identified using CapeFarmMapper: <https://gis.elsenburg.com/apps/cfm/>. The website provides a platform to access information from the Western Cape Surveyor-General farm and cadastre database. As such the application area was identified to be on the remainder of Farm Middelburg 10. All landowners adjacent to the application area as identified above were notified. Six (6) notices were sent on the 23 February 2017 (proof of postage included below).

However the appointed Planner informed us that the application area in terms of this proposal is actually located on Farm 6/10 Middelburg. This however only came to light after the circulation of the **Pre-Application BAR**. Subsequent to the correct identification of the application area, additional owners and occupiers adjacent to the site were identified. Following which an additional six (6) notices were sent to these neighbours on 13 July 2017 (proof of postage included below) notifying them of the application as well as informing them of the availability of the Pre-Application BAR. The additional neighbours were afforded with the opportunity to register their interest in the project as well as to provide them with the opportunity to comment of the Pre-Application BAR.

3. Placing an advertisement in a local and national newspaper in compliance with the Regulations.

An advert was placed in the Langeberg Bulletin on the 03 March 2017; as well as in Die Burger on the 03 March 2017 notifying the public of the development and inviting them to register as Interested and Affected Parties within 30 days.

4. Lists of Identified and Registered Interested and Affected Parties

This section of the report is included in compliance with the Regulations. This list includes the potential as well as the registered Interested and Affected Parties. The list of parties who were identified as potential I&APs as per the requirements of the Regulations and the list of parties who requested registration as an I&AP, and who are registered on the I&AP database for the project as required in terms of the Regulations were included. A Comments and Response Report from registered I&AP's will be included.

5. Workshop with Key Role players

A site inspection was conducted on 30 March 2017 by an official from the Department; Mr. Gary Arendse from the Directorate: Waste Management. Mr. David Houghton, the Chief Operating Officer, accompanied the Departmental official at the Facility during the inspection. To respond to a complaint received on 24 March 2017 with regard to alleged nuisance conditions at the Robertson Abattoir Composting Facility.

The following observations were made:

- On the day of the investigation, irregular odours were not noticed at the Facility.
- The Facility, however, had a large amount of flies evident during the inspection, which could create a nuisance.
- In order to track how far outside of the Facility flies were still noticeable, two reference points were selected alongside the dirt road to the Facility, the first reference point approximately 50m and the second approximately 100m down the road from the Facility. It was noticed that at the 50m reference point, the amount of flies were considerably less, while flies were barely noticeable at the 100m reference point.
- The Facility is in the process of applying for a Waste Management Licence (WML), which will have strict conditions to operate the Facility. The Department will ensure that the Facility stay compliant with the operating conditions of their licence, should it be granted, and in so doing, minimize negative impacts on the environment.

The Department recommends the following:

- Mitigation measures must immediately be put in place to prevent odour and fly nuisances from becoming concerns in future.
- The Chief Operating Officer must supply the Department with monthly feedback in order to establish whether the implemented mitigation measures are successful.
- Abattoir waste must immediately be covered at the compost facility in order to prevent it attracting vermin and creating odours.

On 31 March 2017, Mr David Houghton, reported that 19 (nineteen) fly traps were purchased and will be put up on the boundary of the Facility. They will also meet with Ecolab and Coopers in order to establish which chemical to use to control the flies on the property.

6. Public Open Day

Following comments received on the Pre-Application BAR - there was an outpouring from interested and affected parties at the need for a public meeting to provide them with an opportunity to air their concerns regarding the application.

A public open day was held on the 26 October 2017. All key departments and interested and affected were notified of the public meeting on the 17 October 2017.

Attendance Register:

26 OCTOBER 2017



ATTENDANCE REGISTER PUBLIC PARTICIPATION MEETING: ROBERTSON COMPOST FACILITY			
NAME	SURNAME	CONTACT NUMBER / EMAIL	REGISTER AS IAP
Louis	Jordan	louis@pma-ha-bermains.co.za	✓
Hannereé	Joost	hannere@gmail.com	✓
Anna-Christa	Redelinghuys	annachris@mweb.co.za	Planning Consultant
John	Fauvé	johnaure@bervallei.co.za	✓ E-engage
DAVID	HOUWTON	david@robab.co.za	N/A

Apologies received:

Mr. Gerber:

Click here to download pictures if they failed to download. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

From: lauren@ecoimpact.co.za
 To: Lauren Abraham
 Subject: RE: Public Open Day Invitation - 26 October 2017

Date: Wed 18/10/2017 10:03:31 AM

Hi Mr. Gerber

Thank you for the invite. I will not be able to attend due to my participation in the Valuation Court in Drakenstein. Please keep me posted and register my apology. As a bordering neighbour/adjacent I am still opposed to the project.

Kind regards
 P.A. Gerber
 083-2138120

From: Lauren Abraham (mailto:lauren@ecoimpact.co.za)
 Sent: 17 October 2017 06:15 PM
 To: stasoon@bscma.co.za; 'Normicaarets Furr'; gmn@capewind.co.za; bremet@wind.co.za; hteevatel@wind.co.za; Peter.Harmer@westerncape.gov.za; 'Tim C Mathews'; 'Biba.kuipers@westerncape.gov.za'; 'Shevan.Brookhuis@westerncape.gov.za'; eharham@westerncape.gov.za; gary.arshe@westerncape.gov.za; hranden@dsrburg.com; Lindiwe.Gomburg@dsrburg.com; gphstet@pnc.gov.za; wasefa.thasas@westerncape.gov.za; gmn@langberg.org.za; brenna@langberg.org.za; 'Gerber'; 'Moist@qathambomzi.co.za'; 'Younis Roux Le'; hanners@gn2.com; 'Christo Redders'; 'Bobby Jordan'; '201w@hotmail.co.za'
 Subject: RE: Public Open Day Invitation - 26 October 2017

Good afternoon,

Please note the Open Day is scheduled for Thursday 26 October 2017 as indicated on the attached invitation.

Please ignore the date in the subject line.

Kind regards,
 Lauren Abraham

eco impact
 Eco Impact Legal Consulting (Pty) Ltd
 Reg. 2010/015346/07
 P.O. Box 60479
 Durbanville
 South Africa
 Office: +27 21 21 671 3600
 Fax: +27 21 21 671 3610
 Email: lauren@ecoimpact.co.za

Mr. McLean:

From: ST Hilda's <st.hilda@capeinwielands.gov.za>
To: Lauren Abrahams
Cc: Markus Engelbrecht; Steven Groffman
Subject: RE: Public Open Day Invitation - 26 October 2017

Good day,

Thank you for the invitation.....I will unfortunately be unable to attend. It would, however, be appreciated if the notes on the meeting content can be forwarded to me for record purposes.

From: Lauren Abrahams [<mailto:lauren@ecoimpact.co.za>]
Sent: 19 October 2017 08:41 AM
To: Markus Engelbrecht
Cc: ST McLean
Subject: RE: Public Open Day Invitation - 26 October 2017
Importance: High

Dear Markus,

Thank you for your email. Please see below the invitation sent out to registered I&AP's and key departments. I will add yourself and Mr. Steven McLean to the contact persons for Cape Winelands District for any future distribution regarding the project.

PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON PORTION 6 MIDDELBURG 10, ROBERTSON
DEADP: DEVELOPMENT MANAGEMENT REF NO.: 13/3/1/6/7/1/BI/14/1347/16
DEADP: WASTE MANAGEMENT REF NO.: 15/2/5/7/BI/1A/W0813/17

Good day,

As a registered interested and affected party or key department for the above mentioned application please find attached the following for your attention:

1. Invitation to a public open day (Thursday, 26 October 2017);
2. Locality map;
3. Latest site development plan.

Please note that the public open day will provide an opportunity for open discussion regarding the proposed activities.

Please feel free to contact me should you have any concerns or questions regarding the open day.

Please acknowledge receipt.

Comments Received:

Issues raised by I&APs are the same as those received on the Pre-Application BAR - These have all been addressed in Table 5 of this report.

ROBERTSON ABATTOIR COMPOSTING FACILITY
PUBLIC MEETING ON 26 OCTOBER 2017

COMMENT SHEET

NAME: Louis Jordaan + Hanneke Jooste

E-MAIL: Louis@grahambeckwines.co.za
hanneke@gmail.com

COMMENTS

- ① water stort heinigs &
preses was.
 - ② dwal vanaf Abattoir en bedlat
dierse langs mekaar. Besmetting
tussen dwal en dierse wat weer abattoir
toe gaan
-
-
-
-
-
-
-
-

ROBERTSON ABATTOIR COMPOSTING FACILITY
PUBLIC MEETING ON 26 OCTOBER 2017

COMMENT SHEET

NAME: Johan Faurie

E-MAIL: johanie@barvallei.co.za

COMMENTS

1. Dept. Briefly visited site & commented that flies a bigger problem than smells. Flies a problem but persistent smells remains a problem when temperatures high
2. Management systems not solving persistent smells.
3. Smells adverse effect on tourism & hiking route.
4. Negative effect of mules & hogs on vineyards & cost of spraying crops.
5. Wild Pigs carrying sickness from rotting meat could be a problem.

NOTICE SENT TO NEIGHBOURS AND ERECTED ON SITE



PUBLIC PARTICIPATION PROCESS

PROPOSED ABATTOIR COMPOST FACILITY ON REMAINDER OF FARM MIDDELBURG 10, ROBERTSON

DEA&DP: DEVELOPMENT MANAGEMENT REFERENCE NR: 16/3/3/6/7/1/B1/14/1347/16

DEA&DP: WASTE MANAGEMENT REFERENCE NR: 19/2/5/7/B1/14/WL0013/17

Notice is given of the public participation process commenced by South African Farm Assured Meat Group cc for the development of a compost facility to recycle and treat abattoir and organic waste to produce compost on approximately 7.5 ha. Construction of storm water cut-off channels and collection dam to contain and store all storm water generated on site for reuse and recycling onto the compost rows as part of the treatment and compost making process. The development of feed lots for the keeping of animals for commercial production.

Location: The proposed development is situated approximately 14km northwest of Robertson, east of the R60.

Listed Activities:

Activity No(s):	Provide the relevant Basic Assessment Listed Activity(ies) as set out in Listing Notice 1 (GN No. R. 983)
4	The development and related operation of facilities or infrastructure for the concentration of animals for the purpose of commercial production in densities that exceed - (i) 20 square metres per large stock unit and more than 500 units per facility; (ii) 8 square meters per small stock unit and; a. more than 1 000 units per facility excluding pigs where (b) applies; or b. more than 250 pigs per facility excluding piglets that are not yet weaned; (iii) 30 square metres per crocodile at any level of production, excluding crocodiles younger than 6 months; (iv) 3 square metre per rabbit and more than 500 rabbits per facility; or (v) 250 square metres per ostrich or emu and more than 50 ostriches or emus per facility.
8	The development and related operation of hatcheries or agri-industrial facilities outside industrial complexes where the development footprint covers an area of 2 000 square metres or more.
28	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; Excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.
Activity No(s):	Provide the relevant Basic Assessment Listed Activity(ies) as set out in Listing Notice 3 (GN No. R. 985)
NA	
Activity No(s):	Provide the relevant Scoping and EIR Listed Activity(ies) as set out in Listing Notice 2 (GN No. R. 984)
NA	
Activity No(s):	Provide the relevant Category A Waste Management Activity(ies) as set out in List of Waste Management Activities (GN No. R. 921)
6	The treatment of general waste using any form of treatment at a facility that has the capacity to process in excess of 10 tons but less than 100 tons.
12	The construction of a facility for a waste management activity listed in Category A of this Schedule (not in isolation to associated waste management activity).
Activity No(s):	Provide the relevant Category B Waste Management Activity(ies) as set out in List of Waste Management Activities (GN No. R. 921)
NA	
Activity	Provide the relevant Category C Waste Management Activity(ies) as set out in List of Waste

No(s):	Management Activities (GN No. R. 921)
1	The storage of general waste at a facility that has the capacity to store in excess of 100m ³ of general waste at any one time, excluding the storage of waste in lagoons or the temporary storage of such waste.
2	The storage of hazardous waste at a facility that has the capacity to store in excess of 80m ³ of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or the temporary storage of such waste.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Lauren Abrahams
 PO Box 45070, Claremont, 7735
 Fax: 021 671 9976
 Tel: 021 671 1660
 Email: admin@ecoimpact.co.za

Date: 03 March 2017



PROOF OF NOTICES ERECTED ON SITE - 16 March 2017





NOTICE PUBLISHED IN NEWSPAPERS

PUBLIC PARTICIPATION PROCESS PROPOSED ABATTOIR COMPOST FACILITY ON REMAINDER OF FARM MIDDELBURG 10, ROBERTSON DEA&DP: DEVELOPMENT MANAGEMENT REFERENCE NR: 16/3/3/6/7/1/B1/14/1347/16 DEA&DP: WASTE MANAGEMENT REFERENCE NR: 19/2/5/7/B1/14/WL0013/17

Notice is given of the public participation process commenced by South African Farm Assured Meat Group cc for the development of a compost facility to recycle and treat abattoir and organic waste to produce compost on approximately 7.5 ha. Construction of storm water cut-off channels and collection dam to contain and store all storm water generated on site for reuse and recycling onto the compost rows as part of the treatment and compost making process. The development of feed lots for the keeping of animals for commercial production on approximately 9 ha.

Location: The proposed development is situated approximately 14km northwest of Robertson, east of the R60.

Listed Activities: GNR 983 Listing Notice 1 - Listed Activities 4, 8, 28. GNR 921 Category A Waste Management Listed Activities 6, 12. GNR 921 Category C Waste Management Listed Activities 1, 2.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Lauren Abrahams
PO Box 45070, Claremont, 7735
Fax: 021 671 9976
Tel: 021 671 1660
Email: admin@ecoimpact.co.za

eco impact
Environmental Health & Safety Legal Consulting

**PUBLIC PARTICIPATION PROCESS
PROPOSED ABATTOIR COMPOST FACILITY ON
REMAINDER OF FARM MIDDLEBERG 10, ROBERTSON
DEA&DP: DEVELOPMENT MANAGEMENT REFERENCE
NR: 16/3/3/6/7/1/B1/14/1347/16
DEA&DP: WASTE MANAGEMENT REFERENCE NR:
19/2/5/7/B1/14/WL0013/17**

Notice is given of the public participation process commenced by South African Farm Assured Meat Group cc for the development of a compost facility to recycle and treat abattoir and organic waste to produce compost on approximately 7.5 ha. Construction of storm water cut-off channels and collection dam to contain and store all storm water generated on site for reuse and recycling onto the compost rows as part of the treatment and compost making process. The development of feed lots for the keeping of animals for commercial production on approximately 9 ha.

Location: The proposed development is situated approximately 14km northwest of Robertson, east of the R60.

Listed Activities: GNR 983 Listing Notice 1 - Listed Activities 4, 8, 28, GNR 921 Category A Waste Management Listed Activities 6, 12, GNR 921 Category C Waste Management Listed Activities 1, 2.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Lauren Abrahams
PO Box 45070, Claremont,
7735

Fax: 021 671 9976

Tel: 021 671 1660

Email:

admin@ecoimpact.co.za



**LAERSKOOI SWELLENDAM SPOG
MET 5 BOLANDATLETE**

Saterdag, 25 Februarie, het 18 atlete van Laerskool Swellendam aan die Boland Atletiekbyeenkoms in die Paarl deelgeneem. Vyf atlete het hul Boland-kleure verwerf en neem Saterdag, 11 Maart, deel aan die Wes-Kaap Atletiekkampioenskappe by Dal Josaphat stadium in die Paarl.

Baie geluk aan Kari van As (3de in spiesgooi); Nelbé Mouton (3de in spiesgooi); Graham Thompson (3de in 150m Hekkie); Andrea Boshoff (3de in Hoogspring) en Kura-Mari Beyers (3de in 1200m). Laerskool Swellendam is trots op julle!



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Government

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www.westerncape.gov.za/jobs

Candidates are welcome to access the website at Cape Gateway address:
4 Dorp Street, Cape Town, Western Cape, South Africa.

Closing date:
24 March 2017

The WCG is guided by the principles of Employment Equity. Candidates with disabilities are encouraged to apply and an indication in this regard would be appreciated.



NOTICE: WERK TOEGANGSBEHOEFTES

T0329 L&A:ln.operational@wca.gov.za

**PROOF OF POSTAGE / DELIVERY - NEIGHBOUR NOTICES
SEE ANNEXURE 1**

**PROOF OF POSTAGE / DELIVERY - ADDITIONAL NEIGHBOUR NOTICES
SEE ANNEXURE 1**

**PROOF OF POSTAGE / DELIVERY - PRE-APPLICATION BAR
SEE ANNEXURE 1**

**PROOF OF POSTAGE / DELIVERY - NOTIFICATION OF PUBLIC OPEN DAY
SEE ANNEXURE 1**

**PROOF OF POSTAGE / DELIVERY - APPLICATION
SEE ANNEXURE 1**

TABLE 1: LIST OF KEY DEPARTMENTS

STAKEHOLDER	CONTACT PERSON	TELEPHONE	FAX NUMBER	EMAIL ADDRESS
Breede-Gouritz Catchment Management Agency Private Bag X3055 Worcester 6850	Elkerine Rossouw / Ntombi Feni	023 347 8127	NA	erossouw@bocma.co.za nfeni@bgcma.co.za
Cape Winelands District Municipality PO Box 100 Stellenbosch 7599	Municipal Manager/ Mayor / Ward Councillors Mr. Steven McLean Mr. Marius Engelbrecht	021 888 5272 / 021 888 5130	021 887 3451	mm@capewinelands.gov.za smclean@capewinelands.gov.za
CapeNature Private Bag X5014 Stellenbosch 7599	Alana Duffell-Canham	021 866 8000	021 866 1523	aduffell-canham@capenature.co.za
Central Breede River Water User Association (Robertson) PO Box 232 Robertson 6705	Mr. Louis Bruwer	023 626 2451	023 626 5259	lbruwer@lando.co.za breewater@lando.co.za
DEA&DP: Air Quality Management Private Bag X9086 Cape Town 8000	Peter Harmse / Joy Leaner	021 483 2888	021 4833254	Peter.Harmse@westerncape.gov.za Beverly.Barry@westerncape.gov.za
DEA&DP: Development Management Private Bag X9086 Cape Town 8000	The Director Region 2 / Mr. D'mitri Matthews	021 483 5829	021 483 4372	NA
DEA&DP: Pollution and Chemical Management Private Bag X9086 Cape Town 8000	Ms. W Kloppers	021 483 2752	021 483 3254	Wilna.kloppers@westerncape.gov.za

DEA&DP: Waste Management Private Bag X9086 Cape Town 8000	Mr. Eddie Hanekom / Mr. Gary Arendse	021 483 2728	021 483 4425	ehanekom@westerncape.gov.za
Department of Agriculture: Western Cape Private Bag X1 Elsenburg 7606	Brandon Layman / Corr van der Walt	021 808 5099	021 808 5092	brandonl@elsenburg.co.za
Department of Health: Western Cape Cape Winelands and Overberg Private Bag X3079, Worcester, 6850	Guillaume Olivier	023 348 8131	023 348 8124	golivier@pgwc.gov.za
ESKOM: Land Development Po Box 222 Brackenfell 7561	Mr. Antonio Coerecuis	021 980 3404	021 980 3035	NA
Heritage Western Cape Private Bag X9067 Cape Town 8000	Ms. Waseefa Dhansay	021 483 9533	021 483 9842	waseefa.dhansay@westerncape.gov.za
Langeberg Local Municipality Private Bag X2 Ashton 6715	Municipal Manager/ Mayor / Ward Councillors	023 615 8001	023 615 2272	mm@langeberg.gov.za
Western Cape: Transport and Public Works - Road Network Management PO Box 2603 Cape Town 8000	Chief Director: ML Watters Grace Swanepoel	021 483 4669		Grace.Swanepoel@westerncape.gov.za

TABLE 2: NEIGHBOURS

FARM/ERF	SG CODE	REGISTERED OWNER	ADDRESS
MIDDELBURG 6/10	C0650000000001000006	REBEN TRUST	POSBUS 895, ROBERTSON, 6705
MIDDELBURG 8/10	C0650000000001000008	NOREE PLASE PTY LTD	POSBUS 7, ROBERTSON
MIDDELBURG 9/10	C0650000000001000009	FOUR COUSINS TRUST	POSBUS 19, KLAASVOOGDS, 6707
MIDDELBURG 7/10	C0650000000001000007	GLOBAL PACT TRADING 302 PTY LT	13 CHARDONNEY STREET, SILWERSTRAND, ROBERTSON, 6705
GANNABOSCH VLAKTE 51	C0650000000005100000	H R GROBBELAAR FAMILIE TRU	POSBUS 89, ROBERTSON
RE/2/10	C0650000000001000002	AS ABOVE	AS ABOVE
2/11	C0650000000001100000	AS ABOVE	AS ABOVE
MIDDELBURG 4/10	C0650000000001000004	PERISSEIA PTY LTD	POSBUS 765, ROBERTSON
NORREE 4/11	C0650000000001100004	AS ABOVE	AS ABOVE
NORREE 1/11	C0650000000001100001	AS ABOVE	AS ABOVE
MIDDELBURG RE/10	C0650000000001000000	PERISSEIA PTY LTD	POSBUS 765, ROBERTSON
MIDDELBURG 10/10	C0650000000001000010	C F GERBER	POSBUS 837, WELLINGTON, 7654
VINKE RIVIER 15/8	C0650000000000800015	D J MATTHYSER	POSBUS 482, ROBERTSON
VINKE RIVIER FARM 7/8	C0650000000000800007	RAPIDOUGH PROP 396 CC	POSBUS 541, ROBERTSON
FARM NO. 4	C0650000000000400000	D KEYSER	POSBUS 845, ROBERTSON
VINKE RIVIER 22/8	C0650000000000800022	H C JOOSTE	POSBUS 209, ROBERTSON
VINKE RIVIER RE/8	C0650000000000800000	J L & Z JORDAAN	POSBUS 471, ROBERTSON
KOMPLATS KOPPEN RE/1	C0650000000001000000	AS ABOVE	AS ABOVE
VOETPADS BERG RE/2	C0650000000000200000	J L & Z JORDAAN	MADEBA PLAAS, ROBERTSON

TABLE 3: LIST OF KEY DEPARTMENTS AND REGISTERED INTERESTED & AFFECTED PARTIES

STAKEHOLDER	CONTACT PERSON	TELEPHONE	FAX NUMBER	EMAIL ADDRESS
Breede-Gouritz Catchment Management Agency Private Bag X3055 Worcester 6850	Elkerine Rossouw	023 347 8127	NA	erossouw@bocma.co.za ; nfeni@bgcma.co.za
Cape Winelands District Municipality PO Box 100 Stellenbosch 7599	Municipal Manager/ Mayor / Ward Councillors Mr. Steven McLean Mr. Marius Engelbrecht	021 888 5272 / 021 888 5130	021 887 3451	mm@capewinelands.gov.za
CapeNature Private Bag X5014 Stellenbosch 7599	Alana Duffell-Canham	021 866 8000	021 866 1523	aduffell-canham@capenature.co.za
Central Breede River Water User Association (Robertson) PO Box 232 Robertson 6705	Mr Louis Bruwer	023 626 2451	023 626 5259	lbrewer@lando.co.za breewater@lando.co.za
DEA&DP: Air Quality Management Private Bag X9086 Cape Town 8000	Peter Harmse / Joy Leaner	021 483 2888	021 4833254	Peter.Harmse@westerncape.gov.za
DEA&DP: Development Management Private Bag X9086 Cape Town 8000	The Director Region 2 / Mr. D'mitri Matthews	021 483 5829	021 483 4372	D'mitri.Matthews@westerncape.gov.za
DEA&DP: Pollution and Chemical Management Private Bag X9086 Cape Town 8000	Ms. W Kloppers Shehaam Brinkhuis	021 483 2752	021 483 3254	Wilna.kloppers@westerncape.gov.za Shehaam.brinkhuis@westerncape.gov.za

DEA&DP: Waste Management Private Bag X9086 Cape Town 8000	Mr. Eddie Hanekom / Mr. Gary Arendse	021 483 2728	021 483 4425	ehanekom@westerncape.gov.za Gary.Arendse@westerncape.gov.za
Department of Agriculture: Western Cape Private Bag X1 Elsenburg 7606	Brandon Layman / Corr van der Walt	021 808 5099	021 808 5092	brandonl@elsenburg.co.za ; LandUse.Elsenburg@elsenberg.com
Department of Health: Western Cape Cape Winelands and Overberg Private Bag X3079, Worcester, 6850	Guillaume Olivier	023 348 8131	023 348 8124	golivier@pgwc.gov.za
ESKOM: Land Development Po Box 222 Brackenfell 7561	Mr. Antonio Coerecuis	021 980 3404	021 980 3035	NA
Heritage Western Cape Private Bag X9067 Cape Town 8000	Ms. Waseefa Dhansay	021 483 9533	021 483 9842	waseefa.dhansay@westerncape.gov.za
Langeberg Local Municipality Private Bag X2 Ashton 6715	Municipal Manager/ Mayor / Ward Councillors Tracey Brunings	023 615 8001	023 615 2272	mm@langeberg.gov.za ; tbrunings@langeberg.gov.za
Western Cape: Transport and Public Works - Road Network Management PO Box 2603 Cape Town 8000	Chief Director: ML Watters Grace Swanepoel	021 483 4669		Grace.Swanepoel@westerncape.gov.za

REGISTERED I&APs				
P.A. GERBER P.O.BOX 837 WELLINGTON 7654	P.A. GERBER Please don't register it because we live on a farm and can't receive mail by day.	082-2136120		gerberl@vodamail.co.za
GRAHAM BECK WINES - ROBERTSON PO Box 724 Robertson 6705	Mossie Basson Pre-App BAR to be sent via email	023 626 1214	023 626 5164	Mossie@grahambeckwines.co.za
Perisseia (Pty) Ltd P.O. Box 374 Richards Bay 3900	Le Roux Fourie	082 454 9191	035 789 1892	leroux@dmvrb.co.za
GRAHAM BECK WINES - ROBERTSON PO Box 724 Robertson 6705	Louis Jordaan Operations Manager	083 676 3606		louis@grahambeckenterprises.co.za
Doornkloof Private Nature Reserve	Hanneré Jooste			hannere@gmail.com
Christo Reeders Attorneys on behalf of Perisseia (Pty) Ltd PO Box 1138 Houghton 2041	Attorney Christo Reeders Perisseia (Pty) Ltd Mr. Johan Fourie, and Mr. Le Roux Fourie	Tel: 0878090406 Cell:0828820826		christo.reeders@crattorneys.co.za
Sunday Times	Mr. Bobby Jordan	021 4881782	083 925 8358	jordanb@sundaytimes.co.za
Amandelhof Posbus 482 Robertson 6705	D. J. Matthyser			308win@hotmail.co.za

TABLE 4: COMMENTS AND RESPONSES TABLE – REGISTRATION PERIOD

STAKEHOLDER/IAP	DATE	COMMENT	RESPONSE
<p>Le Roux Fourie leroux@dmvrb.co.za</p>	<p>17/03/2017</p>	<p>I am one of the parties representing Perisseia (Pty) Ltd whom owns various properties directly adjacent, bordering onto, as well as in close proximity to the Remainder of Farm Middelburg 10</p> <ul style="list-style-type: none"> • Part of Remainder of Middelburg 10 and various others: Le Roux Fourie Vignerons Wine Cellars & Wine Tasting Room, Function Venue, Vineyards, 2 Directors Houses planned above vineyards, Planned renovation of 3 existing Dams for water storage and tourism. • 51ha across the road – to be Game Fenced with permanent Tented Camp next to the River. • It should be noted that a long term Eco Farm Housing Development Project (40 Luxury Units in 8 low-density clusters) have been planned for this farm. • Other activities include but not limited – Pristine Birding on the Farm and in Kloof, Mountain Biking, Trail Running, Hiking Trails, Wine Tasting, Hands on harvesting & Wine making events, Picnic Hikes, Star Gazing, God with Us Ministries (International Students) • Portion 3 van 10 Middelburg – Planned Labourers Cottages & BBBEE Development. • Langvlei Farm 52 PTE 16 – Le Roux & Fourie Vignerons Wine Shoppe, Coffee Shoppe, Tourism Flag Project, Future Boutique Wine 	<p>We hereby acknowledge your registration as an interested and affected party, as well as the list of planned activities on property in close proximity to the proposed development.</p> <p>It is the intention of the developer to mitigate negative impacts as a result of the proposed activities. These have been discussed in the Basic Assessment Report, which will be sent to you for the regulatory 30 days commenting.</p> <p>The Basic Assessment Report will include appendices such as layout, locality, and site photographs. Please feel free to provide any additional comments on the documents provided to you.</p>

		<p>Cellar Wine Shoppe.</p> <ul style="list-style-type: none"> • Langvlei Farm 52 PTE 17. <p>Your advertisement calls for comment, yet provide no details relating to specific activities, location layout etc, so it's not possible to provide comments at this stage.</p>	
<p>Graham Beck Wines / Rooiberg Breederivier Conservancy Mossie Basson</p>	17/03/2017	<p>I refer to notice on Farm Gate, Middleberg 10. ref DEA/DP 16/3/3/6/7/1 B1 14/1347/16 and DEA/DP waste Management Ref 19/2/5/7/ B1 /14/WLoo13/17 and would like to have detailed information regarding this development to refer to our Conservancy (Rooiberg Breederivier Conservancy) management committee regarding possible input towards said development.</p>	<p>The Pre-Application Basic Assessment Report will be sent to all registered I&APs who will be given the opportunity to provide comments on the proposed development.</p>
<p>Cape Winelands District Municipality Steven McLean</p>		<p>Good morning Mr Arendse,</p> <p>This Department has just received a complaint regarding the composting plant – Vinkrivier, Robertson – Abattoir waste:</p> <ul style="list-style-type: none"> • Bad odours – smells up to 1,5 km from the composting plant are being experienced; • Alleged dumping of Abattoir waste on a Friday at approx.. 18h00...being left uncovered till the Monday – flies and odours; • Attracting wild pigs; • Neighbouring wine cellar are expressing 	<p>Good Afternoon Steven,</p> <p>Please be assured that I will carry out a full investigation of the concerns listed below on Thursday when I am back on site. In the mean time I thought I would give you an update on some of the points.</p> <p>1. Bad Odours and Smells up to 1.5Km away. Obviously this is a subjective matter and whilst we can't provide you with a detailed assessment without knowing the exact location, and when it</p>

		<p>concerns regarding odours causing product damage(wine-making process being affected,etc);</p> <ul style="list-style-type: none"> • Cyclists have complained \ enquired regarding bad odours 	<p>may be down wind of the site (worse case scenario) I can assure you that this is something we all keep a close eye on when visiting the site. Obviously there is a level of odour generated during the process, but we ensure this is kept to a minimum by insisting that when any abattoir by product is brought to the site it is covered immediately. Except for blood, which we allow to soak into a window for 1 hour before turning and covering. Initially we did have a problem with the smell generated by the blood, but this was before your site visit in February. We established that this was caused by us waiting for the tanker to be full before we brought it. We have now changed this practice to bringing blood every day, no matter the fill level of the tanker. We also top up with water at the abattoir. This has reduced the smell considerably. On site there is not a smell that could be considered obnoxious at all, even so close. We also ensure that we control the C:N ratio to prevent ammonia being produced (too high Nitrogen) by the composting process which produces the smell that would be objectionable. This costs us a considerable amount as our main control method is the use of wood chips which we buy in. I have attached results from our first test we have done which shows we are producing a good quality compost with a desirable C:N ratio.</p> <p>2. When we first started we did deliver one truck of</p>
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			<p>stomach contents late one afternoon which was not covered until the next day. This was outside our standard operating procedure even at such an early stage of our site development. This was down to poor communication between the abattoir and the site which has now been rectified. We now ensure that no deliveries leave the abattoir after 15:30 so that it can be received and covered before the end of shift on the farm. Everyone concerned has been given clear instructions and informed of the consequences of not following them. The covering of the by-product immediately has definitely helped with the numbers of flies.</p> <p>3. This is the first time that we have been made aware of the supposed attraction of wild pigs, and if it is caused by the composting site. We have never spotted the pigs on the farm in the past. I have instructed our site manager to keep an eye out for any signs of wild pigs and to instruct the night time staff to be extra vigilant. It would be useful if the complainant could provide photos so that we could establish the type, kind, size and sex of the pigs as this would give us some information on how best to manage any potential problem.</p> <p>4. We take on board the wine cellars concerns and obviously do not wish to get into conflict with them being our neighbours. However these are unsubstantiated concerns at present and again we</p>
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			<p>would be grateful if they could provide us with any evidence so that we could look at possible control methods. I would like to mention that a number of local wine and fruit farms are using products similar to our compost, whether it is manure, chicken litter, compost or all 3 on their vineyards / fruit farms in order to maintain soil quality. We have also noticed another composting facility in the local area which is actually on a wine farm itself, although a small facility this also needs to be considered as well.</p> <p>5. With regards to the cyclists complaining about the odours I would refer to my original answer in point 1, but would like to add that it is not an offensive smell and not dissimilar to the smell coming from any dairy, beef, or lamb farm that can be found in and around Robertson.</p> <p>Hope the above answers your concerns / queries but I will provide further feedback this Thursday when I am onsite.</p> <p>Regards David Houghton Chief Operations Officer (SA Meat Assured)</p>
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TABLE 5: COMMENTS AND RESPONSES TABLE – PRE-APPLICATION BAR

STAKEHOLDER/IAP	DATE	COMMENT	RESPONSE
CapeNature Allana Duffel- Canham	11/07/2017	<p><u>Compost Facility Site:</u></p> <ol style="list-style-type: none"> 1. The site was historically covered by Breede Alluvium Renosterveld. Although Breede Alluvium Renosterveld is listed as Vulnerable according to the list of threatened ecosystems published in 2011, a recent analysis by CapeNature’s conservation planner, using far more recent groundcover imagery than that used for the 2011 listings, has shown that only 42% of the original extent of this ecosystem is remaining. Thus it now qualifies as Endangered under criterion A1 (remaining extent). 2. A portion of the site has been determined as Critical Biodiversity Area (CBA). Whilst we note that this classification is disputed due to the area being previously disturbed and most of the natural vegetation being removed, the presence of natural vegetation was not the only reason that the western portion of the site was determined as CBA and one of the other reasons includes watercourse protection. Due to the level of disturbance the more correct classification would probably have been CBA 2 which acknowledges that the site is degraded but should be rehabilitated. It is apparent from an examination of current and historical aerial images that drainage lines are present on site 	<ol style="list-style-type: none"> 1. The classification provided by CapeNature in terms of the vegetation status is noted. 2. A detailed site development plan including storm water management plan has been included in Appendix B1 of the BAR. Please also see the Freshwater Ecological Impact Assessment and Risk Assessment Matrix in relation to the activities on the sensitive aquatic areas in close proximity.

		<p>and the site has been prone to erosion in the past which indicates that water does flow through the site occasionally. This means that there may be a risk of compost washing off site and into watercourses after a heavy rainfall event. Therefore the size of the facility should be reduced to allow larger buffers between it and the watercourses north and west of the site.</p> <p>3. Although the site purportedly has a high clay content and the risk of infiltration is therefore deemed to be low, we would still like confirmation from a geohydrologist in this regard.</p> <p>4. Linked to points 2 and 3, input from a geohydrologist should also be obtained regarding the need for mitigation measures (such as berms, cut-off drains, retention pond etc.) to control run-off and infiltration.</p> <p><u>Feedlot Site:</u></p> <p>5. The feedlot site was also historically covered by Breede Alluvium Renosterveld. Although this site has been cleared of natural vegetation, the feedlot does also pose a risk to the nearby watercourse especially if nutrient rich runoff from the site is able to enter the river. A substantial buffer should also be allowed for (>50m) between the edge of the feedlot and the riparian zone. Erosion on site must also be strictly monitored and controlled.</p>	<p>3. The determination in terms of the high clay content was based on a soil study conducted at the site location (Please see Appendix G3). Additional studies to determine the potential affect to water resources has been conducted in Appendix G1 and G2 respectively.</p> <p>4. A storm water management plan has been included in the site development plan in Appendix B1. This has been informed by the specialist input in Appendices G1 - 3, as well as the natural topography of the site.</p> <p>5. The impacts have been assessed in the Appendix J of the BAR, Freshwater Ecological Impact Assessment as well as in the Risk Assessment Matrix. Recommendations to mitigate negative impacts have been included in the BAR and EMP.</p>
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		<p>6. For both sites the EMP must stipulate buffers between activities and the watercourses. Although some standard operating procedures have been provided for several activities on site (for example delivery, turning in of animal products, temperature and pH recording etc.) there are no requirements stipulated for monitoring and ensuring contaminants do not leave the site and this requires further consideration.</p>	<p>6. Please refer to the recommendations in the Freshwater Ecological Assessment and Risk Assessment Matrix - which has been incorporated into the BAR and EMP.</p>
<p>DEA&DP: Air Quality Management Peter Harmse</p>	<p>12/07/2017</p>	<p>1. Dust and Noise Control Regulations 1.1. Dust and noise may be generated during the construction phase of the project. 1.2. In this regard. the operation must comply with the following:</p> <ul style="list-style-type: none"> • National Environmental Management: Air Quality Act (NEM: AQA), National Dust Control Regulations (Notice 827 of 2013); • Western Cape Noise Control Regulations (P.N. 200/2013). <p>2. Odour Impact Management 2.1. The D: AQM is aware that the composting process generates a certain level of odour, but the Directorate has noted that the facility has received complaints regarding alleged excessive odour emissions emanating from the composting plant. The facility must investigate best practice measures to minimise or avoid offensive odours.</p>	<p>1. Dust and Noise Control Regulations 1.1. Noted. 1.2. Noted. This has been emphasised in the EMP. 2. Odour Impact Management 2.1. SOP's have been developed and implemented at the facility which aims to greatly reduce any offensive odours which may come from activities at the facility. It must be noted that the facility will be associated with odours however through the implementation of best practice methods and the SOP's the odours should not be overly offensive and would be similar to that which may come from any beef, dairy or lamb farm in and around Robertson. See the EMP in Appendix H for operation control for the mitigation of flies. 3. Environmental Management Programme (EMP) 3.1. Noted. This has been included for</p>

		<p><i>"In terms of Section 35 (2) of the NEM: AQA (Act No. 39 of 2004), the occupier of the premises must take all reasonable steps to prevent the emission of any offensive odour caused by any activity on such premises."</i></p> <p>3. Environmental Management Programme (EMP)</p> <p>3.1. The proposed Standard Operating Procedures (SOP's) mentioned in the Pre-Application BAR should be instituted and maintained in the daily operational production process. The EMP should include, but not be limited to the following considerations related to the abovementioned SOP's</p> <ul style="list-style-type: none"> • The composting facility lies 60km away from the Robertson Abattoir, therefore it is important to revise measures to effectively transport abattoir waste to the composting facility as to reduce and or mitigate spillage. • Blood should be removed from the abattoir every day to reduce the potential for odour release. • High temperatures may pose a fire risk, therefore the windrows and bulk storage areas should be monitored for temperature spikes. • Carbon and nitrogen ratios must be at 	<p>consideration in the EMP.</p>
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		the required level as to abate potential odour release.	
DEA&DP: Waste Management Mr. Gary Arendse	13/07/2017	<p>2. The Department has no objection to the above-mentioned application subject to the following conditions:</p> <p>2.1. Please note that all alternatives must be properly assessed in terms of the Environmental Impact Assessment (EIA) Regulations and the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as stated below:</p> <p>2.1.1. Be advised that in terms of the EIA Regulations and NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that the Department may grant a waste management licence for an alternative as if it has been applied for or may grant a waste management licence in respect of all or part of the activity applied for.</p> <p>2.1.2. Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives. You are hereby reminded that it is mandatory to investigate and</p>	<p>2. The Departments comments and conditions are duly noted.</p> <p>2.1. Noted. Due consideration as required in terms of the EIA Regulations, 2014 as amended has been included in the BAR and EMP.</p> <p>2.2. This has been included as such in the EMP. The only waste that will go to landfill will be waste that cannot be composted.</p> <p>2.3. Waste minimisation measures have been included in the EMP.</p> <p>2.4. SOPs have been developed for implementation to ensure that the facility is operated in such a manner that no health hazard or nuisance conditions occur, such as noise, odour, vectors and windblown litter.</p> <p>2.5. Please see the SOP developed and implemented to prevent such an occurrence.</p> <p>2.6. Compliance in terms of the National Norms and Standards for Storage of Waste has been included as a performance parameter for the facility.</p> <p>2.7. Noted. See attached maps included in Appendix D2 indicating the relevant land uses within a 2km and 5km radius of the development site.</p>

		<p>assess the option of not proceeding with the proposed activity (i.o.w. the "no-go" option) in addition to other alternatives identified. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found. No comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the option of not proceeding, is required during the assessment. What would, however, be required in this instance is that proof of the investigation undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the no-go option exist must be provided to the Department.</p> <p>2.2. The disposal of waste should be considered as a last resort after having considered the re-use and recycling of waste during the construction phase.</p> <p>2.3. Waste minimisation should be implemented, such as the avoidance,</p>	<p>2.8. Please see the recommendations as per the Soil Study in Appendix G3.</p>
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		<p>reduction, re-use and recycling of waste during construction, before considering the disposal of such waste.</p> <p>2.4. The composting area and waste storage area shall be operated in such a manner that no health hazard or nuisance conditions occur, such as noise, odour, vectors and windblown litter.</p> <p>2.5. Please note that no waste from infectious animals, including blood from infectious animals may be used for composting at the Facility.</p> <p>2.6. Please adhere to the National Norms and Standards for the Storage of Waste in terms of Government Notice (GN) No. 926 of 29 November 2013, if the volumes of waste stored exceeds 80m³ for hazardous waste and/or 100m³ for general waste.</p> <p>2.7. The closest residential area/houses must also be indicated, together with the prevailing wind direction per season.</p> <p>2.8. Please note that composting should be conducted on an impermeable surface.</p>	
Langeberg Municipality: Town Planning Department Tracy Brunings	18/07/2017	<p>The following preliminary comments are provided from a land use planning point of view:</p> <p>1. The property in question is zoned Agricultural Zone I in terms of the Section 8 Zoning Scheme regulations. The proposed uses, namely: Compost Facility (from abattoir waste) and Feedlot, are not primary uses in the Agricultural</p>	<p>1. An application is in process of being prepared by Umsiza Planning for a rezoning and consent use application in terms of Section 15 of the Langeberg Municipal Land Use Planning Bylaw, 2015. The penalty fee will be paid together with the application fee. Please see Section D page37 for details regarding the zoning.</p>

		<p>Zone 1. An application must therefore be lodged in terms of Section 15 of the Langeberg Municipal Land Use Planning Bylaw, 2015. It is noted that the use of the compost facility has already commenced which is in contravention of the Zoning Scheme and a penalty fee is payable.</p> <p>2. In terms of the Langeberg Spatial Development Framework, 2015 (SDF) the proposed development site falls within “Core”, “Buffer” and “Transformed” Spatial Planning Categories. There is no objection to development within the Transformed and Buffer areas subject to the sustainable management of land use activities. However, development of the compost facility within the identified “Core” SPC adjoining the Middelstekloof River is not consistent with the Desired Management Objectives for this land, namely: to maintain natural land, rehabilitate degraded land and maintain ecological processes. This Core SPC forms an integral part of an important north-south environmental link between the Langeberge and the Breede River and connectivity must be maintained. In this regard, natural buffer areas and no-go areas must be identified and complied with to the satisfaction of Cape Nature, BGCMA and the CBR WUA. The proposed boundaries of the compost facility must be amended accordingly.</p>	<p>2. Please see the Location Plan (in Appendix A). The application site is not located in the Core Area, but adjacent to the Middelstekloof River/CBA. Only a part of the feedlot will be located within 100 meters from the river, while the compost facility will be located approx. 300m from the river.</p> <p>3. The building mentioned is a basic roofed structure used for storage of farm equipment (Please see Site Development Plan - Appendix B). The building is not directly associated with the proposed development and as such is not included for consideration in this application.</p>
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		<p>3. It is noted that there is an existing shed on the site. From google earth, it appears that this shed was built between 2010 and 2014. This office has no records of building plans having been submitted in terms of the National Building Regulations and Building Standards Act No 103 of 1977.</p>	
Le Roux Fourie	10/07/2017	<p>Can you please inform me when the Public Meeting will be held? As I have numerous questions to ask.</p>	<p>A public meeting was scheduled for the 26 October 2017. All key departments and interested and affected parties were notified on the 17 October 2017.</p>
Doornkloof Nature Reserve Mrs. Hanneré Jooste	17/07/2017	<p>My property, being Portion 22 of Farm Vinke Rivier Number 8 in the Langeberg Municipality Division of Robertson, Province of the Western Cape, is directly adjacent to the "proposed" compost facility and feedlot in a private nature reserve, where a small Airbnb is my sole source of income. These "proposed" developments are a matter of extreme concern. I use quotation marks because the compost facility is already in use and has been for months. The most salient points of consequence are:</p> <ol style="list-style-type: none"> 1. The proposed feedlot where you want to keep 6000+ lambs is DIRECTLY ADJACENT TO A NATURE RESERVE where predators like leopard and caracal roam freely. Not only have you failed to address this potential critical conflict, but you explicitly deny the fact that you are 	<ol style="list-style-type: none"> 1. The mapping site that we used to identify adjacent neighbours (CapeFarmMapper: https://gis.elsenburg.com/apps/cfm/). Which provides functionality to the Western Cape Surveyor-General farm and cadastre database - has the incorrect property boundaries for Farm Middelburg delineated on their website. As such the application area was identified to be on the remainder of Farm Middelburg 10. However the appointed Planner has indicated that the application area in terms of this application is actually located on Farm 6/10 Middelburg. This however only came to light after the circulation of the Pre-Application BAR - as such point 1 in your comment is valid and duly noted. We will amend the report to reflect the correct information. 2. Noted. The impacts on adjacent tourism

		<p>near any nature conservation area.</p> <p>2. My very livelihood, being derived from a tourism and hospitality facility inside a nature reserve, is dependent on the pristine nature of the immediate environment <i>and the wild animals contained in and by it</i>. The latter includes Cape Leopard (<i>Panthera pardus</i>), Caracal (<i>Caracal caracal</i>), Large-spotted genet (<i>Genetta tigrina</i>) and African bushpig (<i>Potamochoerus larvatus</i>).</p> <p>In fact, Middelburg Farm is sandwiched between two tourism-dependent neighbours, bordered as it is by Buitenstekloof Mountain Cottages on the eastern side and exacerbating the importance of the existing fly-, odour-, noise- and traffic- and aesthetic problems. I am financially dependent on visitors to the reserve being able to do hiking, trail running and birdwatching <i>in situ</i> and on the scenic and natural beauty of the environment remaining intact.</p> <p>3. Under item 7. LAND USE CHARACTER OF SURROUNDING AREA on page 15 of the The Pre-application Basic Assessment Report you were supposed to "highlight the current land uses and/or prominent features that occur within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site", yet you crossed out</p>	<p>activities will be assessed and your concerns will be included in the impact tables in Appendix J of the BAR.</p> <p>3. I refer to the explanation provided in point 1 above. The section / item indicated as per your comment will be corrected to reflect the correct land use character of the surrounding area.</p> <p>4. We await feedback from BGCMA with regard to the activity in relation to the watercourse.</p> <p>5. Noted. The current Economic Dimension of Ward 6 as described in the Langeberg Municipality IDP 2017 has indicated that in the ward there are 3859 employed people. However employment is greatly dependant on the time of year due to the nature of work associated with the surrounding farms offering employment. Apart from agricultural activities providing employment opportunities the ward also boasts Cape Lime, a number of wineries with restaurants and shops providing employment opportunities to persons in the low-skilled up to skilled working sectors. Workers that will be employed for the proposed development will be similar to those currently employed in the ward. Safety and security in the area will thus be unchanged as a result, and may result in less crime due to a more sustainable employment opportunity offered by the proposed development.</p>
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		<p>both "Nature conservation area" AND "Tourism & Hospitality facility" among others. THIS NEEDS TO BE RECTIFIED. Your statement that "The development site is surrounded by agricultural activities such as cultivation of crops as well as livestock farming." is therefore erroneous. The development site is, in fact, sandwiched between two hospitality facilities and bordering a Nature Reserve. THIS NEEDS TO BE RECTIFIED.</p> <p>4. Your concern for the proximity of the facility to the watercourse (page 24) is noted and we await the outcome of your Water Use Licence application.</p> <p>5. Another cause for legitimate concern is the potential influx of contract workers/job seekers to the site (page 37). Besides the littering foreseen in the report, it causes a safety risk to my person as I live alone.</p> <p>6. In attempted mitigation of the noise factor, the report states that "adjacent land users/owners are a considerable distance from the proposed development site and the noise from construction activities may be negligible" (page 38). This is misleading. Sound carries extremely effectively in the quiet of a nature reserve and will be heard by the guests who come here specifically for the quiet and on whom I depend for an income.</p> <p>7. Offensive odours (page 41) emanating from the</p>	<p>6. Noted. However this will only occur during the construction phase of the activity, which will be done in accordance with the EMP. The noise during operation would be similar to that which may be expected on a working farm which contributes to most of the wards land use activities. Please see refer to the impact tables in Appendix J and the EMP in Appendix H for details regarding the mitigation of noise during all phases of the development.</p> <p>7. Noted. Best practice measures are in the process of being investigated to mitigate and minimise offensive odours from the facility. Please refer to the impact tables in Appendix J and the EMP in Appendix H for details regarding the mitigation of flies during the operational phase for the compost facility and feedlot.</p> <p>8. The facility will be fenced which will provide a barrier in terms of wild pigs and caracal in the area. Please refer to the EMP for mitigation controls in terms of human/wildlife interactions.</p> <p>9. Noted. Additional information has been added to the BAR.</p> <p>10. A public meeting was scheduled for the 26 October 2017. All key departments and interested and affected parties were notified on the 17 October 2017.</p>
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		<p>compost site reach the gate to Doornkloof Private Nature Reserve on a regular basis. I - and, more importantly, my guests - have to stop to unlock and re-lock two gates to enter and leave the reserve (automatic gates are not an option), during which time it is often necessary to hold one's breath for the stench. A large proportion of my guests are cyclists, who are affected by the smell when they use the public road that runs past the compost rows.</p> <p>8. As for "the attraction of... wild pigs" mentioned on page 42: Doornkloof is home to a family of bushpigs regularly photographed on our trail cameras. As with the leopard and caracal, please explain your management plan for these.</p> <p>9. Lastly, the following paragraph (page 41) needs explication too:</p> <p><i>Effluent in the form of sludge / compost tea resulting from the composting process will be generated. The effluent is expected to drain into the constructed cut-off storm water channels which will be stored in the collection dam. The effluent collected in the dam will then be reused in the composting process by spraying the effluent onto the windrows / mounds. This process is considered as disposal of waste that could have a detrimental effect on the environment, which an authorisation in terms of section 21 of the NWA would be</i></p>	
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		<p><i>required.</i></p> <p>10. I therefore urge a public meeting to address issues including, but not limited to, the aforementioned concerns.</p>	
Mr. P.A. Gerber		<p>I refer to the 193 page document, on CD,(which I had printed), which deals with the above matter.</p> <ol style="list-style-type: none"> 1. From the start, I want to put it on record that I find it totally unacceptable that, as a neighbour, I had to accidentally read about the application in the media. Meanwhile, other neighbours, further away from the application-site, have been consulted and listed as affected parties. I.O.W. your process started flawed. <p>I would like to comment on a page-by-page basis.</p> <ol style="list-style-type: none"> 2. On page 3 of the Basic Assessment Report of the DEAPP under “SUMMARY OF ALTERNATIVES” it is mentioned that this site is the only site available to SAFAM. This is nonsensical as there are many other properties more suitable for sale for the purpose of a compost facility. I also find it devious that the application is actually dual and that it would be wiser to split the application into 2 separate application. There are hundreds of abattoirs all over SA, so this problem of waste is not unique. 3. On page 4 reference is made of a “NO-GO OPTION” and attempts are made to create the 	<ol style="list-style-type: none"> 1. The mapping site that we used to identify adjacent neighbours (CapeFarmMapper: https://gis.elsenburg.com/apps/cfm/). Which provides functionality to the Western Cape Surveyor-General farm and cadastre database - has the incorrect property boundaries for Farm Middelburg delineated on their website. As such the application area was identified to be on the remainder of Farm Middelburg 10. However the appointed Planner has indicated that the application area in terms of this application is actually located on Farm 6/10 Middelburg. This however only came to light after the circulation of the Pre-Application BAR. All additional neighbours have been identified. Those whom have registered have been afforded with an opportunity to comment on the Pre-Applications BAR and Appendices. The notice is placed in the newspaper as part of the public participation to encourage stakeholder engagement. 2. In terms of Circular: EADP 0028/2017 the following was decided: <i>“Following an agreement between the Ministers responsible for environmental affairs, water and sanitation, and mineral resources, amendments</i>

		<p>perception that the subject property is “underutilized Agricultural land unsuitable for the cultivation of commercial crops.” This is very wrong as the property has excellent agriculture potential, and that it only needs water for irrigation. As there are surplus water in the Breede River and water technology. The statement that if the proposed development did not continue, SAFAM might cease operations, is not acceptable and irrelevant to the land. I.o.w., if other abattoirs don’t have their own compost-facilities , they would all cease all over S.A.? “A negative impact on the market,” = What market?</p> <p>4. On page 9, at the question regarding (Processing activities(e.g. manufacturing, storage ,distribution), the answer is “NO”. This is incorrect. There will definitely be storage of compost. This is the case at all compost plants and there is no reason why this one would be different.</p> <p>5. The next question regarding storage facilities, is also answered “NO”. This again is wrong. Of course raw materials will be stockpiled as they are not always available every day.</p> <p>6. On page 10, at number 2, reference is made to the size of the property, being 402,19 hectares. Why then does the applicant want to place the plant next to the road?</p> <p>7. On page 11, at the bottom, reference is made</p>	<p><i>have been made to the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) (“MPRDA”), the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (“NEMAQA”), National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”), the National Water Act, 1998 (Act No. 36 of 1998) (“NWA”), and the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEMWA) to give effect to “One Environmental System” for South Africa. The date of effect of the last of the amended provisions was 8 December 2014.”</i></p> <p>As such an integrated approach and application process is encouraged.</p> <p>3. Please see the Soil Study (Appendix G3) which details the soil potential of the proposed site. The reserve determination in terms of potential water available in the system can only be made by the Department of Water and Sanitation as it has to take into account all current water users and pending applications. Abattoir waste and by-product used to be accepted by the Local Municipality Landfill, this has subsequently ceased as the Municipality no longer accepts such waste. SAFAM had to find an alternative way of dealing with the waste and the composting facility is the most feasible solution (in terms of the feasibility study and investigations). Should the application be</p>
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		<p>about the close proximity of the Vinkriver. The proposed plant is dangerously close to this river. We have owned our property for 36 years and over these 4 decades we have seen serious water flooding, which makes the application site totally unacceptable.</p> <p>8. On page 12 under “3”, there are a few “NO” answers which should be affirmative such as steep slopes, seasonal wet soils, erosion, etc. Furthermore, there is also doubt whether the whole site is high in clay content.</p> <p>9. On page 15, under number “7”, there are a characters of the surrounding area which has been wrongly deleted such as, “UNTRANSFORMED AREA”; “ TOURISM & HOSPITALITY FACILITY” ; “SPORT FACILITIES”; “NATURE CONSERVATION AREA”; “MOUNTAIN,KOPPIE OR RIDGE”. It was mischievous and misleading to have omitted these “CHARACTERISTICS”.</p> <p>10. On page 16, reference is made to “TOURISM OPPORTUNITIES”, but the application-area is alive with tourism such as Mountain bikers every weekend cycling past and over the properties adjacent. This terrible odour will have a very negative effect. The increase in the associated traffic on the road, which is already too narrow for 2 trucks to pass each other, will be very dangerous for cyclists.</p> <p>11. On page 18, under “10” , regarding</p>	<p>rejected operations may cease at SAFAM as alternative waste management solutions are not feasible. According to the Langeberg Municipality IDP 2017 the “Primary Sector” contributes R641.5 million (14.3%) of the Municipalities GDP (2015). There are only 2 Red Meat Abattoirs in the Municipality which contributes 3.6% in terms of the Western Cape’s Infrastructure.</p> <p>4. Processing activities are not triggered in terms of this application. Please see the section on “Storage and Treatment facilities for solid waste and effluent generated by the project” in the same table of the BAR.</p> <p>5. Noted, raw material storage areas to be described in the BAR.</p> <p>6. The site is chosen based on the environmental constraints (i.e. the mountain catchment are located north on the proposed area) as well as accessibility. Please refer to the Section E in the BAR for further details relating to the locality of the application area.</p> <p>7. An application to BGCMA (regional competent authority in terms of water use applications) has been made, who will provide guidance in terms of the facility in relation to the watercourse. Please see the Freshwater Ecological Impact Assessment and Risk Assessment Matrix in Appendix G1 and G2 respectively.</p>
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		<p>“APPLICABLE LEGISLATION”, it is stated that the National Health Act, Act 61 of 2003, the Constitution of S.A., 1996 and the National Building Regulations and Building Standards Act 103 of 1977 (NBRBSA) and the relevant regulations are all not applicable. This is totally untrue.</p> <p>12. On page 19, it would be appreciated if it could be explained which “GUIDELINES ON PUBLIC PARTICIPATION” were used that was responsible for not informing me as a neighbour, but the neighbour on the other side, further away from the subject property?</p> <p>13. On page 20 it was answered “YES” at question 1.(iii). This was obviously not the case as I have pointed out.</p> <p>14. On page 21 mention is made of the fact that no public meetings were held. This is a serious flaw.</p> <p>15. On page 23, item 6, it is stated that electricity will be obtained from ESKOM, however the supplier of electricity there is the Municipality itself. Furthermore, the increase in trucks and other vehicles will cause more road maintenance. Under item nr. 9, I have already indicated the incorrectness of the statement that “the soil was determined to be unsuitable for the cultivation of commercial crops.”</p> <p>16. Under item 10, the only concern mentioned is the watercourse, whereas nothing is</p>	<p>8. Noted. The responses in the table has been informed by specialist input included in Appendices G1-3 of the BAR.</p> <p>9. Noted, please see my response above (point 1). The table will be amended accordingly.</p> <p>10. Noted. SOP’s have been developed and implemented at the facility which aims to greatly reduce any offensive odours which may come from activities at the facility. It must be noted that the facility will be associated with odours however through the implementation of best practice methods and the SOP’s the odours should not be overly offensive and would be similar to that which may come from any beef, dairy or lamb farm in and around Robertson. It is also noted that there are a number of livestock farms, dairies and a brewery located within 5km from the facility all of which would contribute to odours associated with these activities. Please see impact tables in Appendix J as well as the EMP in Appendix H for mitigation controls associated with the impacts identified.</p> <p>11. Section 10 of the BAR refers to obtaining permits / authorisations under the legislation listed in that table. Thus the use of “Not Applicable”.</p> <p>12. Please see response above listed number 1.</p> <p>13. As above.</p> <p>14. A public meeting was scheduled for the 26</p>
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		<p>mentioned about the natural area, etc.</p> <p>17. Under item 11, it is mentioned that “Odours and flies may become problematic,” yet no details are provided to stop this. The noise increase will also be apparently “during the construction phase.”, yet further on in the application mention is made of all the extra traffic that will be generated by farmers bring animals to the feedlot, other loads of compost-components and raw material, etcetera. The visual effect mentioned is only the feedlot, yet the compost facility is right next to the main road which is increasing daily with tourist, whether by car, horses, cycles, etc. The disastrous effect of the compost plant adjacent to the Slent Road, between Paarl and Klipheuwel, is a classic example.</p> <p>18. Under item 12, the application is very economical with the truth regarding the impact on the surrounding land users impact costs.</p> <p>19. Under 13, regarding the positive and negative impacts, the only positive impact of the project will be the waste management solution for the abattoir. Nobody else. The fact that farmers can sell their livestock to the feedlot has nothing to do with the disastrous compost facility. The negative impacts are seriously downplayed by referring to the source of nuisance, impact on natural and cultural resources and aquatic environments as,</p>	<p>October 2017. All key departments and interested and affected parties were notified on the 17 October 2017.</p> <p>15. Noted. Please see Soil Study in appendix G3.</p> <p>16. Please refer to the impact tables in Appendix J as well as the EMP in Appendix H which includes mitigation measures that must be implemented to reduce the potential impact on the receiving environment.</p> <p>17. Please refer to the impact tables in Appendix J as well as the EMP in Appendix H which includes mitigation measures that must be implemented to reduce the potential impact on the receiving environment. More details will be included to ensure that all the potential impacts are listed and fully described.</p> <p>18. As above SOPs have been developed for implementation to reduce potential negative impacts that may affect the opportunity costs of neighbouring land users.</p> <p>19. Section 13 merely lists the negative and positive impacts. Please see the impact tables in Appendix J for details of impacts assessed.</p> <p>20. According to the Waste Minimisation Guideline for Municipalities, 2015: “South Africa takes the management of organic waste seriously and considers it a high priority waste. The Department of Environmental Affairs have developed a National Organic Waste Strategy with the intention to divert this waste from</p>
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POTENTIAL IMPACTS !!!

- 20. Under item 14 it is stated that the composting facility is the “best practicable environmental option for the land”. This is such a flawed statement and is rejected with disdain.
- 21. The “benefits to society” referred to under item 14, is only to the abattoir. There are many other buyers for lambs and other livestock.
- 22. Under “SECTION E: ALTERNATIVES”, on page 26, the wrong statement regarding the potential of the land is again repeated. The 6000-6500 animals in the feedlot will be fed “nutritious feed”, which again will generate traffic to the area. These 2 activities, namely the compost facility as well as the feedlot are proposed as the only location available to SAFAM is rejected.
- 23. On page 29, mention is made that “SAFAM is in the initial stage of composting production.” On inspection of the property it was observed that composting activities was already in production and occurring and there was also signboards indicating as such at the locked gate of the farm. It would also be of importance to know if there are not already abattoir waste being used in the processing. For instance, where are the blood of the abattoir currently being dumped?
- 24. The “NO-GO OPTION” referred to on page 30, is overplayed by the concealed threat that the abattoir might close. This is disingenuous, as

landfills and manage them more appropriately, through composting. A variety of technics are available for processing organics into compost. See Table 12 below.”

Table 12

ORGANIC WASTE TECHNIQUES	
Open Systems	This is considered the very basic “back yard” styled composting (Bokashi, GreenGenie, etc.)
Turned Windrow	Waste placed in heaps to be turned occasionally
Static Windrow	Piles are made as above, but no turning is allowed.
Vermicomposting	Worms are used to decompose the waste.
Closed System	Composting done in enclosed systems, like containers, silos, bays, tunnels or halls.

Taken from National Organic Waste Composting Strategy, www.environment.gov.za

Find out about the National Organic Waste Strategy at the links below:

- <http://sawic.environment.gov.za/documents/1824.pdf>
- <http://sawic.environment.gov.za/documents/1825.pdf>

- 21. Noted. A more detailed motivation to be included in this section.
- 22. Noted. Please see the soil study in Appendix G3 of the BAR. Traffic impacts will be assessed in the impact tables in Appendix J. Your rejection in terms of location of the facility is noted.
- 23. Composting activities are currently conducted at the facility. The facility is currently operating under the threshold that would require a Licence whilst SAFAM obtain the required authorisations in terms of NEMA, NEMWA and NWA. Please see SOP 1 - 3 which details current

		<p>the gaps in the market will always be filled by other operators.</p> <p>25. On page 32 you are already affirming the drainage line feeding into the Vinkriver which is totally too risky. We have owned our property since 1980, i.o.w. 37 years, and we have witnessed various flooding over these decades, making your application site too risky for any such intended composting activities.</p> <p>26. On page 33, under 2 (b) it is stated that the activity will not produce emissions into the atmosphere. This is not true, as the both the facilities and the compost facility in particular, will definitely produce stinking emissions, as is the case in all other such facilities.</p> <p>27. On the same page, under 3, regarding “ WATER USE”, it is mentioned that only water from a “river, stream, dam ,lake” will be used. It is doubtful whether the facility could run a 100% without the supplementing of borehole/underground water.</p> <p>28. On page 37 under the “Cumulative impacts:” , mention is made of the “relatively low impact” on traffic. This is not true as the road traffic has consistently increased over the past few years and the width of the road is also problematic.</p> <p>29. On page 38 mention is made of the “little” noise impact of the project. This is also untrue as our property is just over a 1000 meters from the site and we hear vehicles, never mind</p>	<p>processes implemented at the facility. A process flow of the composting conducted at the facility is included in SOP 1.</p> <p>24. Please refer to my response in point 3 above.</p> <p>25. We are in the process of engaging with BGCMA and an application to them will be lodged. Please refer to my response in point 7 above.</p> <p>26. The emissions as referred to in that section is in terms NEMAQA. In this instance yes there will be odours which will be mitigated through the implementation of SOPs and through sound management practices at the facility.</p> <p>27. An application will be lodged with BGCMA for all applicable water uses for the facility. Information on the progress and the status of the application with BGCMA will be provided in subsequent reports which will be circulated to all interested and affected parties.</p> <p>28. Noted, this will be reviewed.</p> <p>29. The noise impact will be similar to what is currently experience in the area. Taking into account the number of businesses located west of the facility that uses the gravel road to access their sites. An SOP has been developed to limit the delivery of material to the facility. This reduces the potential impact of traffic and noise as a result. This also assists improved site operations and site hygiene as it ensures that raw materials brought for composting is handled immediately in terms of the relevant</p>
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		<p>trucks, further away.</p> <p>30. On page 40, the “Mitigation” proposed to rectify the “Cumulative impacts:” re adjacent aquatic habitats, are not enough to avoid a catastrophe in times of flooding and other extreme weather events.</p> <p>31. On page 41, the impact of offensive odours are grossly underplayed and understated. To further try to dilute the effect of this stench with that of an ordinary feedlot, is truly underestimating the intelligence of all the other affected parties. Bring me one of these composting plants that don’t stink and stench.</p> <p>32. On page 42 the “Health risks” is under-played as there are a lot more animals than wild pigs and flies that will be attracted to this open-air restaurant. No plan developed yet.</p> <p>33. On page 48 of 62 in “Appendix 1” it is confirmed what is the biggest complaint and fear of allowing such a composting facility. In the second-last sentence it is stipulated that, “Other materials used will be chicken litter,…” This chicken litter could also include dead chickens and Worcester is surrounded by chicken farms. There is no guarantee that the abattoir in Worcester will not start delivering their dead carcasses, blood, etc. and other abattoir waste to this compost facility, as other municipalities are getting much stricter with abattoirs.</p>	<p>SOP for the material received. This will decrease the risk of odour and pests at the facility.</p> <p>30. The impacts on the water resource will be further investigated through the application with BGCMA. Please see the Freshwater Ecological impact Assessment and the Risk Assessment Matric in Appendix G1 and G2 respectively, as well as the impact tables in Appendix J.</p> <p>31. As I have stated in points above the facility is implementing SOPs and practices to greatly reduce the smell from the facility. There however will be a level of odour as a result of the composting process, , but would like to add that it is not an offensive smell and not dissimilar to the smell coming from any dairy, beef, or lamb farm that can be found in and around Robertson. The facility takes all complaints lodged seriously and all complaints are recorded and investigated as best as reasonably possible.</p> <p>32. The facility is required to be fenced and locked to ensure that unauthorised persons do not enter the facility. The fence will adequate to keep out naturally occurring game / animals in the region. Aspects from the “Human Wildlife Conflict” guideline published by CapeNature has been included in the EMP should such a situation occur at the facility.</p> <p>33. The Waste Licence will be issued with strict</p>
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		<p>34. On page 2 of the "SUMMARY OF THE PUBLIC PARTICIPATION PROCESS", under 5, bullet 2, mention is already made of the large amount of flies present.</p> <p>35. As there are more processes that still has to be followed, I send you these comments, which contains some of my serious concerns regarding this compost facility.</p>	<p>conditions that SAFAM must comply with. Any change to the licence and its conditions would result in the applicant having to go through an amendment application process.</p> <p>34. Your concern as well as other interested and affected parties concern regarding the flies has been duly noted. A number of SOP's have been developed and are included in the EMP for implementation during operation. The SOP's provide strict control of site activities to mitigate the presence of pests. An anti-fly programme has been implemented to eradicate fly larvae, and a number of pest control measures such as the application of Baycidal and Neoprex and the installation of flytraps around the facility have been implemented to control the number of flies. Please see the operational controls for the control of flies in the EMP in Appendix H for details.</p> <p>35. Noted, Thank you.</p>
<p>Christo Reeders Attorneys Perisseia (Pty) Ltd</p>		<p>1. We represent Perisseia (Pty) Ltd, which is an interested and affected party for purposes of the application prepared for South African Farm Assured Meat Group CC in respect of the proposed Robertson Abattoir Compost Facility and Feedlot. We also represent the individual .representatives of that company, namely Mr Johan Fourie and Mr Le Roux Fourie (collectively "our clients"). Our clients are all interested and affected parties and their</p>	<p>1. I hereby acknowledge your representations on behalf of your clients as listed.</p>

		<p>concerns regarding your client's application have previously been communicated to you.</p> <p>2. On behalf of our clients, we summarise the multiple concerns our clients have regarding the application for environmental authorisation and waste management licence for the proposed Robertson Abattoir Compost Facility and Feedlot and the documents to be submitted in support thereof. Based on the information contained below, we believe it would be prudent for you, as the independent environmental assessment practitioner, to propose that the application be commenced afresh in order to address the numerous shortcomings that have been identified.</p> <p>3. <u>Previous complaints demonstrating likely inability of applicant to effect sound environmental management practices</u></p> <p>3.1. As evinced by our clients' previous complaints in this regard, there are frequently unsavoury and nauseating smells present in the area; all emanating from rotten meat that occurs from the current activities conducted on the property. These smells occur during various weather conditions, though they are particularly bad during high temperature periods and arise at various times of the day. The smells are particularly prevalent on the farm which is</p>	<p>2. Please note that we are currently in the PRE-APPLICATION phase. The pre-application phase allows for Public Participation as well as obtaining guidance and feedback from Key Departments, Stakeholders and all registered interested and affected parties. This provides a platform to resolve issues raised by the department, stakeholders and interested and affected parties PRIOR to the submission of the formal Applications. Please note that the formal applications have not been submitted to allow for adequate Public Participation regarding the applications. It is through this Pre-Application phase that we would like to "address the numerous shortcomings" as indicated in your letter.</p> <p>3. <u>Previous complaints demonstrating likely inability of applicant to effect sound environmental management practices</u></p> <p>3.1. Odour response Please see the SOPs implemented at the facility in the EMP. The monitoring and control of specific parameters such as pH balance, temperature, air, moisture are critical to ensure the correct fermentation or digestions of the windrows. Procedures for the handling of raw material deliveries as well as implementing a delivery schedule</p>
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		<p>situated directly adjacent to the site (i.e. on the eastern side of the property and on the cycle route which exists on the Van Loveren Farm located South of this property). Our clients have also experienced the smells whilst out walking early in the mornings approximately 1.2 km away from the property.</p> <p>3.2. Foul odours have also been reported as follows:</p> <p>3.2.1. by the Cellar Master, Kobus van der Merwe, at the Cellar at various times of the day. These odours were noted as well by Johan Fourie and German wine buyers when visiting the Cellar;</p> <p>3.2.2. by Kaysha Bucher from America and Barbarah Horsch from Germany in February 2017 whilst using the Cycle Route on the adjacent Van Loveren Farm; and</p> <p>3.2.3. by our clients' farm labourers at a distance of approximately 1km from the Buitenstekloof Main Entrance which in turn is approximately 800m from the Existing Facility - their accommodation is affected.</p> <p>3.3. Clearly, the existing activities conducted on the property on which the proposed activity is to take place are poorly managed. To introduce additional activities</p>	<p>has ensured that the facility is sufficiently prepared to process raw materials for composting on arrival. Through the implementation of the SOPs the process is monitored to maintain an effective and stabilised composting process, without causing overly offensive odours through lack of oxygen.</p> <p>3.2. Same as above</p> <p>3.3. The complaints received have been duly noted and have been investigated by the Department of Environmental Affairs and Development: Waste Management as well as the relevant health officials. The outcome of that visit and investigation can be found on pages 2 - 3 of this document. Please see the Standard Operating Procedure's (SOPs) in the EMP developed and implemented at the facility to ensure that the operation of the facility does not impose any health hazard or nuisance conditions, such as noise, odour, vectors and windblown litter. It is the prerogative of the competent authority to which the applications are made to grant or reject the applications. Please note that although the Department of Health: Western Cape is a Key Department and has been provided with all the information we have yet to receive a formal response to our</p>
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		<p>would, it is submitted, be environmentally irresponsible and clearly result in infringements of our clients' rights to an environment which is not harmful to their health and wellbeing. It is submitted 'that in considering the application, the Department must consider the applicant's existing activities, impacts and failures. Clearly the applicant is not conducting its activities in a manner which is demonstrative of sound environmental management practices. On this basis, our clients vehemently object to any further activities being undertaken by the applicant.</p> <p>3.4. It is noted in Annexure F (the summary of the public participation process) that a site inspection was conducted by the authorities in response to a complaint with regard to alleged nuisance conditions at the Robertson Abattoir Composting Facility. Evidently irregular odours were not detected though flies were noted. It is submitted that further site inspections must be conducted.</p> <p>3.5. We also refer to our concerns below regarding the very real possibility that the activities which are the subject of the current application have already unlawfully commenced.</p>	<p>application.</p> <p>3.4. Noted. Most recently Steven McLean from Winelands District carried out an unannounced visit to the site on the 5th February 2018 and found that flies were not an issue. His report is attached. SAFAM would suggest that there is no causal link proven between the compost site and the flies found at Doornkloof Nature reserve. I would also like to refer back to previous responses to comments made on the fly situation.</p> <p>The areas around Robertson, Vinkrivier and Worcester are covered in Renosterbos amongst other biospheres which naturally support the fly (Diptera) population. A</p>
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		<p>properties and the environment. We are concerned that there has been an entirely inadequate assessment of these potential, and we believe likely, significant impacts. No specialist investigations have been conducted. We believe that, at the very least, the following investigations ought reasonably to have been conducted:</p> <p>5.1.1. <u>Biodiversity Study:</u></p> <p>5.1.1.1. Proof must be provided of consultation with Cape Nature, as well as their comments on the proposed project, specifically with regards to the site being surrounded by Critical Biodiversity Areas (as per Appendix D provided in the BAR) and in relation to the fact that the area identified for the compost facility has been identified as a terrestrial CBA. No opinion of a biodiversity and aquatic specialist has been included in the application to confirm the status and potential impacts on these sensitive areas and further, it appears that the fact that the area identified for the compost facility has been identified as a terrestrial CBA has simply been disregarded without adequate justification or expert corroboration.</p> <p>5.1.2. <u>Health Impact Assessment:</u></p>	<p>have yet to receive a response the email. A Public meeting was scheduled for the 26 October 2017. All key departments and interested and affected parties were notified on the 17 October 2017.</p> <p>4.2. As stated in point 2 above. The application process in in the Pre-Application phase. This provides a platform of engagement with key departments, stakeholders and interested and affected parties to provide guidance in terms of the information and specialist reports required to be conducted to inform the basic assessment report and the EMP.</p> <p>4.2.1. A detailed layout plan has been included in the Appendices B1 - 3.</p> <p>4.2.2. Additional details have been included regarding the composting activities currently conducted at the facility.</p> <p>5. <u>Failure to conduct adequate impact assessment</u></p> <p>5.1. Specialist investigations have been identified through the Pre-Application phase currently in process. Specialist investigations identified to be concluded prior to the submission of the formal applications to the relevant Departments. Please see all specialist studies in Appendix G. Recommendations of specialist studies have been included in the BAR and EMP.</p>
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		<p>5.1.2.1. An activity of this nature has the potential to result in significant health, environmental and general nuisance impacts. Rotting meat, offal, blood, carcasses and the like will be the primary source of the compost and if not properly managed, these can cause various health impacts. There are multiple instances in the documentation provided which indicate that materials other than non-infectious materials may be kept on site. For example, page 54 of 62 paragraph 7 states that "a separate area must be set aside for whole condemned carcasses as these will need to be covered and (remain) undisturbed for up to 3 Months". The abattoir by products for composting referred to on pages 48 of 62 specifically state that it comprises non-infectious materials only being blood, stomach contents, lairage manure, and inspection trimmings not for human consumption. This is apparently contradictory.</p> <p>5.1.2.2. Despite the fact that the basic assessment report lists health impacts as a likely impact associated with the operational phase of the proposed development, no health impact assessment has been conducted. No</p>	<p>5.1.1. Please see comments from CapeNature in Table 5 of this document (Appendix F) as well as our comments thereto in the same table.</p> <p>5.1.2. HIA.</p> <p>5.1.2.1. The waste that is not infectious, but not fit for human consumption, generated is also classified as general waste according to NEM:WA. Carcasses are broken down over a 3 months period in a separate bulk row, where-after it is added to the windrows together with the other by-products. Infectious animal carcasses and animal waste are prohibited from disposal to land with immediate effect, implying that it needs to be treated before disposal. All infectious animals are, however, frozen at the Robertson Abattoir and transported to the Vissershok Hazardous Waste Landfill Site in Cape Town where mortality composting takes place above ground by placing carcasses above ground between layers of soil, wood chippings and horse manure, which catalyse decomposition. The process generates heat, which sterilizes the bodies – breaking down any harmful chemicals and germs.</p> <p>5.1.2.2. Should the competent authority or the Department of Health require an HIA to determine the potential health impacts associated with the facility appoint a</p>
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		<p>assessment on the likely increase in flies (and their knock-on impacts) as a consequence of the activity has been conducted.</p> <p>5.1.2.3. Already, the flies experienced as a consequence of the activities conducted on the property area health hazard. They cannot be controlled and are already a nuisance. If they cannot be controlled under present circumstances, it is not clear how this will be achieved with a bigger operation being in place.</p> <p>5.1.2.4. On page 41 and 42 under "Offensive Odours" it is stated that this impact can be completely mitigated "1- Yes, can be completely mitigated" and again under health risks stated that it could be completely mitigated "1- Yes, can be completely mitigated' yet the attraction of flies and wild pigs has not been considered in any acceptable detail at all. Yet in Section D of the Report (page 24) under Needs and Desirability, it states that "odours and flies from the Facility may become problematic, however, the Facility will have mitigation measures and procedures in place which intends to reduce the impacts on neighbours and members of the public". This obviously does not</p>	<p>competent person to conduct such an assessment.</p> <p>5.1.2.3. Fly control is mitigated through good housekeeping and through effective operational controls. Please see the SOP for Site Hygiene in the EMP. This SOP deals with the operational controls required to minimise pests at the facility. This includes the prompt covering of raw materials delivered as well as the turning requirements of the windrows to ensure that parameters as discussed in point 3.1 are maintained. Fly traps have been installed around the facility and the application of pesticides / fly management programmes (Bycidal, Quickbayt spray, and Neoprex) have been implemented to further control flies. Fly monitoring and treatment records are recorded and kept on site.</p> <p>5.1.2.4. The impact table for offensive odours has been amended to provide additional detail. The associated risk rating has been reviewed. The attraction of flies and wild pigs has been assessed and included in impact tables of the BAR. Additional details have been included in the Need and Desirability section of the report taking into account the impacts highlighted by interested and affected</p>
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		<p>mean completely mitigated. It also flies in the face of what is currently the situation at the site.</p> <p>5.1.2.5. Alkaline Hydrolysis on Page 27: "Alkaline hydrolysis was initially considered as it could possibly handle and process the infectious (materials which would be) condemned. Due to a lack of local knowledge and experience this method was not seriously investigated." It is concerning that this was not properly investigated (and begs the question what else has not been properly investigated) since it is known to our clients that this process is used with good effect at various Abattoir Facilities in KwaZulu Natal.</p> <p>5.1.3. <u>Traffic Impact Assessment:</u></p> <p>5.1.3.1. The existing dirt road running past the Facility is currently used primarily by passenger vehicles and tourists for cycling purposes, hence the road carries a very limited number of heavy vehicles. It is obvious that this Facility would generate a substantial quantity of heavy vehicles when delivering sheep to the feedlot as well as collecting sheep to take to the slaughter facility as well as daily trucks delivering abattoir waste, wood chips and collecting compost for</p>	<p>parties, the department and stakeholders. Best practise guidelines have been incorporated from the National Organic Waste Composting Strategy, 2013.</p> <p>5.1.2.5. Alkaline Hydrolysis works well for the management of small scale abattoir by-product. However there is a lack of local knowledge and experience of using this method on a larger scale.</p> <p>5.1.3. <u>Traffic Impact Assessment</u></p> <p>5.1.3.1. The Abattoir by-products (blood, "pensmis", and minimal carcasses) are gathered on the Abattoir property in the industrial area of Robertson. This is transported in dedicated blood tanks (honey suckers) and skip trucks daily to the application site. The number of trips are/will be:</p> <ul style="list-style-type: none"> • Honey suckers with blood: once per day • 8 ton skip trucks (truck with tank on top): approx. every second day • No trip on weekends, except in
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		<p>distribution. The only effective mitigating measure would be to tar the road from the existing tar road up to the entrance of the property containing the new Facility.</p> <p>5.1.4. <u>Air Quality Study:</u></p> <p>5.1.4.1. Composting organic waste is an important component of the waste management process and a strategy to reduce waste to landfill. Microbiological activity is fundamental to the composting process, therefore any handling of composting material is likely to make airborne significant quantities of those micro-organisms (referred to as bio-aerosols). Bio-aerosols is a term commonly used to describe viable and non-viable airborne biological particles, such as fungal spores, bacteria, pollen, and viruses and their fragments and by-products, like bacterial endotoxins, mycotoxins, peptidoglycans, and (1-3)-beta-D glucans, which may affect living organisms infectiously, allergically, toxigenically or pharmacologically. Workers mechanically handling compost on these sites may therefore be at risk of considerable exposure to bio-aerosols depending on their work task, their proximity to the bio-aerosol source and</p>	<p>emergency cases</p> <ul style="list-style-type: none"> • Sheep will be transported in livestock trucks to/from the site once a day. • Most of the trip length will be on tar road (R60 and DR 1384), with only 2km on DR 1377 (gravel) that will create dust. <p>The two to three additional trips daily will not have an additional substantial impact if compared to the surrounding environment:</p> <ul style="list-style-type: none"> • The R60 carries many trucks between Robertson and Worcester and the railway line runs adjacent to the road; • DR 1384 (tar road) between the R60 and the lime quarry carries many and much heavier trucks to and from the quarry to the lime industry adjacent to the R60; • The lime factory/industry itself creates much noise and dust from their 20/25 ton trucks alongside the R60; and • DR 1377 (gravel road) between Rooiberg Cellar and Nuy carries many trucks from wine farmers, sheep/cattle farmers, and a brewery on a daily basis. The two gates to the application site were placed approximately 20m inside the boundary of the application site to prevent any obstructions by
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		<p>the control measures put in place. In addition, because the work is largely done out of doors, there is the potential for bio-aerosols generated to disperse some distance from the point source. Consequently, there is concern that people living or working in the vicinity of waste composting sites (sensitive receptors) may also be exposed to these bio-aerosols.</p> <p>5.1.4.2. Carcasses from meat processing operations contain concentrated amounts of animal tissue. Typically, organs, flesh, hides, feathers and bones may be included. Handling and composting these materials demand care and special practices to accommodate their challenging properties and to control odours and flies.</p> <p>5.1.5. <u>Storm water management study:</u></p> <p>5.1.5.1. There are only basic comments regarding a cut-off drain and holding dam. It appears that no cognisance was taken of proper designs, structural/civil plans nor any storm water management plan that notes the quantities of water that will be generated during normal operation / flood conditions and what control measures need to be instituted.</p>	<p>trucks in road DR 1377.</p> <p>5.1.4. <u>Air Quality Study</u></p> <p>5.1.4.1. According to the National Organic Waste Composting Strategy - which provides a guideline for composting facilities in South Africa. The mitigation that can be applied for Bio-Aerosols includes but are not limited to:</p> <ul style="list-style-type: none"> • Paving of all operating, storage, unloading and loading areas • Applying a light water spray over dry materials • Windbreaks around facility/piles • Suction sweeping of areas <p>These mitigation measures have been included in the EMPr.</p> <p>The facility is to comply with the provisions of the Occupation Health and Safety Act and applicable Regulations in terms of their employees and their occupational exposure to bio-aerosols.</p> <p>5.1.4.2. The handling of raw-materials for composting and the composting process has been detailed in the SOP to ensure that the composting process is effectively managed which ultimately will control odours and pests. Refer to the EMP for mitigation controls.</p> <p>5.1.5. <u>Storm water management study</u></p>
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		<p>No design drawings of storm water facilities are included, and the potential impact on the drainage line adjacent to the site has not been considered.</p> <p>5.1.6. <u>Socio-economic impact assessment:</u></p> <p>5.1.6.1. The proposed activity is considered incompatible with existing land uses. Moreover, the impact on existing agricultural and tourist related activities have not been adequately assessed, if at all.</p> <p>5.1.6.2. It is our understanding that the proposed activity is likely to generate fungus and spores that will be transported by air and wind onto surrounding crops which include vineyards, pomegranates and other orchards. This will result in these crops being negatively impacted as well as increased crops associated with managing these impacts. Equally, it is likely to have a devastating impact on existing wine making activities conducted at the wine cellar since this activity is highly susceptible to fungus / yeast spore contamination. There has been no investigation into this impact by the applicant or its environmental assessment practitioner whatsoever.</p> <p>5.1.7. <u>Specialist water investigations:</u></p>	<p>5.1.5.1. A storm water management plan has been included as part of the site development plan in Appendix B1.</p> <p>5.1.6. <u>Socio-economic impact assessment:</u></p> <p>5.1.6.1. The Application is made in terms of the new Land Use Planning Bylaw, 2015 through the provincial Section 8 Scheme Regulations, 1988 for the following activities:</p> <ul style="list-style-type: none"> • Footprint rezoning from Agriculture Zone 1 to Industrial Zone II (noxious trade) for the development and operation of a compost site in an area of approximately 3,6 ha (including windrows, effluent dam, storage space for raw and finished products, roads, adequate space for off-loading and turning of trucks); and • Consent use for intensive feed farming (sheep feedlot of maximum 4500 lambs) in an area of 6000m². • Both the above form part of an already disturbed area of approximately 8,6 ha that will be used together and in support of each other. <p>A noxious trade means an offensive use or another use which constitutes a nuisance as envisaged in regulations which are promulgated from time to time in terms of Sections 33 and 34 of the Health Act, 1977</p>
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		<p>5.1.7.1. The site is located directly adjacent to a drainage line. Only limited impacts have apparently been identified. It does not appear that there has been an adequate investigation in this regard. Moreover, no buffer zone has been proposed.</p> <p>5.1.7.2. There is nothing which provides comfort that potential impacts on groundwater have been properly considered and / or mitigation measures proposed.</p> <p>6. <u>Failure to adequately consider alternatives</u></p> <p>6.1. The Basic Assessment Report does not meet the requirements for consideration of alternatives. In various places in the Report reference is made to the area being earmarked for a feedlot and composting facility and that the site is presently "underutilised agricultural land unsuitable for the cultivation of commercial crops" yet commercial crops are produced on almost all the adjacent farms in similar conditions. This statement is obviously untrue and misleading to any reader of the Report.</p> <p>6.2. In the Pre-Application Report, it states on page 13 that the same land where it is claimed that the land is unsuitable for production of crops, "The site was</p>	<p>(Act 63 of 1977). According to the Health Act, nuisance means, inter alia, any accumulation of refuse, offal, manure or other matter which is offensive or is injurious or dangerous to health.</p> <p>The applicability of this definition is uncertain. Although the proposed composting facility activity entails the use of sheep offal and manure as part of the process to manufacture compost, it is not the accumulation /build-up/ gathering/ growth/ increase there-of that constitutes a nuisance, it is rather by-products that are reused/ processed to create a useful and needed product to the agricultural environment.</p> <p>The way these products are used, managed and changed into a high quality compost, cannot be compared with a dumping site or the accumulation of offensive materials that are offensive or dangerous to health. Many farmers develop compost on their farms as part of general practices next to vineyards/orchards, using both carbon (plant material) and nitrogen (animal offal).</p> <p>5.1.6.2. The fungus and spores generated is</p>
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		<p>previously ploughed and planted with pastures and used for grazing purposes". Again, in Appendix J the physical and chemical properties of the soil also showed that the land chosen would not be suitable for any kind of farming, as it would be unsuitable for commercial crops to be grown. The facts contradict the last statement, and prove otherwise.</p> <p>7. <u>Failure to adequately consider mitigation measures / inadequate EMP</u></p> <p>7.1. It appears that the main focus of the application and EMP is on the construction impacts, however the potential concern of our clients are the operational impacts, more than the construction impacts. These operational impacts must be considered and assessed as part of this application.</p> <p>8. <u>Regulatory assessment</u></p> <p>8.1. We do not believe that an adequate regulatory assessment has been conducted. To this end, we draw your attention to subcategory 10 of the listed activities published in terms of the National Environmental Management: Air Quality Act. That Act (as read with the listed activities published in terms thereof) requires an atmospheric emission licence for any installation which processes (including rendering, cooking, drying,</p>	<p>collectively referred to as bio-aerosols. Please see our response in point 5.1.4.1 above in response to concerns regarding exposure to bio-aerosols. Sources of bio-aerosols are not limited to composting activities and are also released from farming of land, livestock farming, housing of animals, dairies, food processing, agitation of water, waste water / sewerage treatment. The assessment of bio-aerosols has been included in the impact table in the BAR.</p> <p>5.1.7. <u>Specialist water investigations</u></p> <p>5.1.7.1. Prior to the appointment of specialists - consultation with BGCMA was sought to ensure the scope of investigation prior commencement of the relevant studies. Please see comments by BGCMA in Appendix F and responses thereto. Please see the Freshwater Ecological Impact Assessment and the Risk Assessment Matrix in Appendix G1 and G2 respectively.</p> <p>5.1.7.2. See above.</p> <p>6. <u>Failure to adequately consider alternatives</u></p> <p>6.1. The section on alternatives has been amended in the report. Please note that the assessment of alternatives has been done in terms of the Departmental Guideline for Alternatives. Please see the soil study undertaken for the</p>
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		<p>dehydrating, digesting, evaporating, or protein concentrating) more than 1 ton of animal matter per day not intended for human consumption. There is no indication that the application of this listed activity has been considered and if not applicable, why this is the case. Instead, it is noted that atmospheric emission activities are marked as being "not applicable".</p> <p>8.2. The construction of a storm water dam also appears to be contemplated though there is no indication that there has been due consideration of the application of, amongst others, section 21 of the National Water Act.</p> <p>8.3. More concerning is the fact that it appears to us that the existing activities may not be being lawfully conducted. For example, we believe that at least a waste management licence would have been required for the disposal of animal carcasses activities which has already taken place from time to time on the property and in respect of which our clients have previously raised legitimate concerns.</p> <p>8.4. There is no mention of this activity already having been conducted in the documentation provided, save for reference to a site inspection having been conducted by the authorities following</p>	<p>site in Appendix G3. The study concluded the following: "The soil classification and analyses show that the area is not suited for intensive agriculture. Even farming with extensive crops e.g. pastures is unlikely to be successful. The main reason for this is the high salt content of the soils, and the inability to leach the salts from the profile."</p> <p>Please note that only a small portion of the farms within a 20km radius cultivate commercial crops. The rest of which consist of livestock farming and dairies. This would then be consistent in terms of the findings in the soils study. Please see the Land Use Maps included in Appendix D2.</p> <p>6.2. Please see response above in terms of the soil study and the findings therein with regards to the soil analysis. The site was used for livestock farming - SAFAM bought the property for the keeping of surplus livestock brought to the SAFAM abattoir for slaughter. From google imagery of the site there is evidence that the application area was ploughed in 2003 and then again in 2006. From the imagery of the site there is no evidence of cultivation of commercial crops. It is on this basis that the viability of cultivation for this site has been drawn.</p> <p>7. <u>Failure to adequately consider mitigation</u></p>
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		<p>receipt of a nuisance complaint. There is also no mention of any existing authorisations or approvals already held by the facility. All existing approvals should have been made available as part of the process. Instead, Annexure F refers to the fact that the site is in the process of applying for a waste management licence. Since the activity has already commenced (potentially unlawfully, since it is not clear whether or not it holds or was required to hold any environmental approvals), the activity which ought properly to have been applied for is an expansion and not the development of a new activity.</p> <p>8.5. It is also our view that if the existing activities have been unlawfully conducted, at least a section 24G rectification application is required in terms of the National Environmental Management Act.</p> <p>9. As indicated above, we believe that there are potentially a number of authorisations and / or listed activities which ought to have been applied for but for which application has not been made. To the extent that this is correct, we submit that it will be necessary to withdraw this application and to commence the process afresh.</p> <p>10. Regardless of the above, kindly provide our clients and us with your responses to all</p>	<p><u>measures / inadequate EMP</u></p> <p>7.1. Noted. Additional operational concerns/ issues have been assessed and included in the EMP. The EMP has included all of the Standard Operating Procedures developed and implemented at the facility, which have been informed by but not limited to Best Practice Guidelines as well as the National Organic Composting Strategy. It must also be noted that the EMP is only one component with which the facility would have to comply with. Should the Waste licence and environmental authorisation be granted it will also contain stringent conditions with which the facility would have to comply with.</p> <p>8. <u>Regulatory assessment</u></p> <p>8.1. Composting does not fall within the definition of the process described in the listed activity - and therefore an air emissions licence is not required.</p> <p>8.2. Please see Section F part 3 - Water, of the BAR which indicates that a water use licence would be required and that an application is to be lodged with BGCMA. Please also see comments from BGCMA in Appendix F and our responses thereto. The application to BGCMA will be included in the BAR.</p> <p>8.3. You are correct in that existing activities</p>
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		<p>concerns raised in this letter. We reserve our clients' rights to respond either to you or directly to the Department, as the case may be.</p>	<p>are conducted at the facility. The activity is below the throughput capacity threshold of 10 tons per day in terms of the NEMA listed activities. Please see comments and response below in consultation with DEADP: Development Management.</p> <p>8.4. Please see above in terms of correspondence with the Competent authorities. Clarity was obtained to determine the applicability of which process is required to be followed in terms of this application. The Competent authority has determined that a Section 24 G application in terms of NEMA would apply in this instance.</p> <p>8.5. See above.</p> <p>9. We are in the pre-application phase as per our comment in point 2. All the required authorisations have been identified in terms of this application as stated in the applicable sections in the BAR.</p> <p>10. Noted.</p>
Louis Jordaan	14/07/2017	<p>Since the compost facility started I had a huge problem with flies. This is confirmed by other neighbours and previous complaints. I therefore believe that method you used to track how far outside the facility flies where noticeable where poor and unsuccessful.</p> <p>In this area are roaming Cape Leopard. What</p>	<p>Your concern regarding the flies has been duly noted. A number of SOP's have been developed and are included in the EMP for implementation during operation. The SOP's provide strict control of site activities to mitigate the presence of pests. An anti-fly programme has been implemented to eradicate fly larvae, and a number of pest control measures such as the application of Baycidal and</p>

		<p>measures are put in place not to be in conflict with this predator and any other like Rooikat? Surely the abattoir waste and feedlot will have influence in behaviour of these animals which will create conflict.</p>	<p>Neoprex and the installation of flytraps around the facility has been implemented to control the number of flies.</p> <p>The facility will be fenced which will provide a barrier in terms of wild pigs and caracal in the area. Please refer to the EMP for mitigation controls in terms of human/wildlife interactions.</p>
<p>DEA&DP: Development Management D'mitri Matthews</p>	<p>18/07/2017</p>	<p>3. The Department has the following comments: 3.1. On 7 April 2017 the Minister of Environmental Affairs promulgated amendments to the regulations in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), viz, the Environmental Impact Assessment ("EIA") Regulations 2014 (Government Notice ("GN") No. 326, 327, 325 and 324 in Government Gazette No. 40772 of 7 April 2017). These regulations came into effect on 7 April 2017. Your attention is therefore drawn to the following: 3.1.1. You are therefore requested to consult the new listed notices as contained in GN No. 327, 325 and 324 of 7 April 2017 and to include all activities (similarly and/or newly listed) applicable to the application in the in-process BAR. You will also be required to indicate how the impacts of the additional activities, listed in terms of the NEMA EIA Regulations, 2014 (as amended), have been</p>	<p>3. Response: 3.1. Noted. 3.1.1. The changes to the listing notices have been assessed in relation to this application. The listed activities as identified and included in the application have not been affected by the changes to the Regulations. No further action in terms of the rest of the Departments comment will therefore be required.</p>

		<p>adequately assessed. In addition to this, all (registered) Interested and Affected Parties must be informed of any new listed activities that may be triggered in terms of the EIA Regulations 2014 (as amended), as well as the potential impacts thereof.</p> <p>3.2. It is noted from the comments and responses report, that the Cape Winelands District Municipality received a complaint regarding the composting plant. It is our understanding from the aforementioned that a composting facility already exists on site. As such, you are requested to confirm whether a composting facility exist on site and whether, if applicable, it would have constituted a listed activity in terms of the NEMA EIA Regulations at the time of commencement with construction activities. Also, should a composting facility exist on site you are requested to provide this Department with details on the size of the facility, the vegetation status at the time before commencement of construction activities, access to the site etc.</p> <p>3.3. From the aerial photographs, attached as Appendix A, it is noted that the site for the proposed composting facility and the feedlot as well as an area north of the watercourse were cleared between 2010 and 2014 (Figures 1 and 2). You are requested to confirm if this is indeed the case. Should it be, you are</p>	<p>3.2. We hereby confirm that a composting facility does exist on the property. The facility currently does not have the capacity to process more than 10 tons per day and therefore operating at its current capacity it does not trigger a listed activity in terms of the NEMA EIA Regulations, 2014 (as amended). The vegetation prior to commencement was minimal as stated in the soil analysis which was conducted prior to the commencement of the composting activity. Animals were kept on the property from time to time and were provided with food as the soil did not support vegetation growth.</p> <p>3.3. Correspondence sent to DEADP: Environment Governance dated, 22 August 2013, in response to a Pre-Compliance Notice received with regard to (1) removal/depositing of material into water course (Middelstekloof River) of more than 5m³, and (2) Clearance of an area of 5 ha or</p>
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		<p>requested to provide this Department with details of the activity e.g. the vegetation status before the commencement of construction activities and if applicable, with proof that Environmental Authorisation was obtained for the clearance of indigenous vegetation.</p> <p>3.4. According to the aforementioned aerial photographs, the construction of a building and associated infrastructure commenced between 2010 and 2014 adjacent to and within 32m of the watercourse. Proof of obtaining Environmental Authorisation for the building must be provided to the Department. Furthermore, clarity regarding whether the building is directly associated to the proposed development must be provided to the Department.</p> <p>3.5. It is noted that a watercourse is present adjacent to the site where the feedlot will be located. You are requested to confirm how far the feedlot facility/facilities will be located from the watercourse. If within 32m of the water course you will need to revise the listed activities applicable to the proposal. It is further suggested since a watercourse is present adjacent to the site and given that an access road runs through the watercourse that a Maintenance Management Plan ("MMP") form a component of the</p>	<p>more of vegetation where 75% or more is indigenous. (Proof submitted to DEADP: Development Management on the 14 December 2017).</p> <p>3.4. Please see above. The building mentioned is a basic roofed structure used for storage of farm equipment (Please see Site Development Plan - Appendix B1). It is confirmed that the building is <u>not directly associated</u> with the proposed development.</p> <p>3.5. The feedlot is located 35m from the watercourse. Please see the detailed site development plan (Appendix B1) indicating the facility and its related activities in relation to the watercourse. As such the listed activities shall remain as it presently is and an MMP will not be required to form part of the EMP.</p>
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		<p>Environmental Management Programme ("EMPr") and that Activity 19 of GN. No. 327 be included as part of the application. It should be noted that should the Department agree to the proposed MMP, future maintenance work specified within the MMP would not require an Environmental Authorisation prior to the undertaking thereof. Please be advised that the MMP relates to the aforementioned listed activity only.</p> <p>3.6. In line with the information requirements of Appendices 1 and 4 of the EIA Regulations, 2014 (as amended), please ensure the following is included in the BAR submitted to the Department for decision-making once formal application has been made: <u>For inclusion in the BAR:</u></p> <p>3.6.1. Original signed declaration (applicant, environmental assessment practitioner and specialist),</p> <p>3.6.2. a plan which locates the proposed activity/ies applied for as well as associated structures and infrastructure at an appropriate scale (i.e. a site development plan),</p> <p>3.6.3. Details of the public participation process undertaken in terms of Regulation 41 of the Regulations, including copies of the supporting</p>	<p>3.6. Noted. All specified points listed in 3.6.1 - 3.6.7 have been included in the BAR and EMP respectively. The Draft BAR and EMP will be sent to the Competent Authority as well as all key departments and I&APs for the regulated 30 days commenting as required by the EIA Regulations, 2014 (as amended).</p>
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		<p>documents and inputs, and</p> <p>3.6.4. A summary of the issues raised by Interested and Affected Parties ("I&APs"), and an indication of the manner in which the issues were incorporated, or the reasons for not including them.</p> <p><u>For inclusion in the EMPr:</u></p> <p>3.6.5. The expertise of that EAP to prepare an EMPr, including a curriculum vitae,</p> <p>3.6.6. A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers;</p> <p>3.6.7. The frequency of monitoring the implementation of the impact management actions.</p>	
DEA&DP: Pollution and Chemicals Management Shehaam Brinkhuis	03/08/2017	<p>1. Operational Management:</p> <p>a) In the event of an accidental spill or leakage of product (e.g. hazardous substances used during both the Construction and Operational Phase), such incidents must be reported to all the relevant authorities including the Directorate: Pollution and Chemicals Management in accordance with Section 30 (10) of the National Environmental Management Act (NEMA),</p>	<p>1. Operational Management</p> <p>a) Noted. This has been included in the EMPr.</p>

		<p>(Act NO.1 07 of 1997). This pertains to the control of emergency incidents and should include the reporting, containment and cleaning-up procedure of such incident and the remediation of the affected area.</p> <p>2. Waste Management:</p> <p>a) All hazardous waste materials must be stored in a clearly demarcated area and disposed of using professional and licenced waste disposal contractors and waste sites. All documents relating to volumes and type of wastes must be available on demand.</p> <p>3. Water Management:</p> <p>a) The proposed feedlot, due to the intensive nature of operation, has the potential to cause significant surface- and/or groundwater impacts (aquifer contamination) due to animal wastes deposited. These impacts need to be managed and reduced to acceptable levels, hence the applicant must adhere to these recommendations and the following mitigating measures should be considered for inclusion in the environmental management plan (EMP):</p> <p>i) Implement corrective actions if any spills are observed;</p> <p>ii) Regularly remove all animal wastes from pens and surfaces transport such wastes to the designated manure</p>	<p>2. Waste Management</p> <p>a) The provisions outlined in your comment have been included in the handling of hazardous waste materials section of the EMPr.</p> <p>3. Water Management</p> <p>a) Noted. The mitigation measures have been added to the EMPr.</p> <p>b) A ground water monitoring and sampling programme has been included in the EMPr.</p>
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		<p>storage area where it can be dried, bagged and sold as manure;</p> <p>iii) Produce and implement an acceptable storm water management plan.;</p> <p>b) A ground water monitoring programme to ensure regular monitoring of ground water quality must form part of the EMP. The results of the monitoring and sampling programme must be available on demand.</p> <p>4. General:</p> <p>a) Vector management could result in water contamination due to pesticide usage. Pesticide application near rivers, wetlands and other fresh water resources should be minimised and applicable types of pesticides (non-persistent) should be applied.;</p> <p>b) The following procedures will assist in the environmentally safe use of pesticides and chemicals:</p> <p>i) Pesticide containers should be stored in a weather-proof and fire resistant building that is maintained in good condition. Pesticide containers should be stored on an impermeable base;</p> <p>ii) A sump to contain and decant spills during pesticide preparation would be fortuitous;</p> <p>iii) Unused pesticide and contaminated disposable equipment should be</p>	<p>4. General</p> <p>a) These provisions have been included in the EMP.</p> <p>b) The procedures for the handling and management of pesticides has been included in the EMPr.</p>
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		<p>disposed of correctly to ensure reduce risk of environmental contamination;</p> <p>iv) Empty pesticide containers should not be burned or buried as it could be a risk to human health and may contaminate soil and groundwater resources.</p>	
D. J. Matthyser	08/08/2017	<p>1. Ek besit die eiendom Amandelhof minder as 2-km vanaf die voorgestelde aanleg.(Sien aangehegte kaart) Die voorgestelde aanleg is in rooi gemerk.</p> <p>2. Omliggende eiendomme sluit in n kelder van Johan Fourie in, was handel dryf as LeRoux & FourieWines, en ook Buitenstekloof gastehuse. Die kelder is ongeveer 850-m, en die gastehuse ongeveer 2,3-km van die perseel.</p> <p>3. Ongeveer 4.7-km van die voorgestelde perseel is in bierbrouery wat handel as Saggy Stone Brewery enwat ook n resturant bedryf.</p> <p>4. <u>Ek staan die ontwikkeling van die voorgestelde aanleg teë, en motiveer as volg:</u></p> <p>4.1. NEMA – South Africa National Environmental Management Act Artikel 28 en 30 van NEMA sal ook hier van toepassing wees. Kompostering het 'n direkte impak op waterbronne en daarom word dit ook deur die NWA gereguleer. Omdat karkasse na komposaanlegte vervoer moet word, sal die NRTA en die bepalings in NEMWA rakende die vervoer van afval ook hier toepassing vind</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. Noted.</p> <p>4. Response to comments:</p> <p>4.1. Section 28 and 30 of NEMA are addressed in the EMP. We await further consultation from BGCMA with regards to the applicable authorisations that may apply in terms of section 21 of the NWA. This is a combined EIA (NEMA) and WL (NEMWA) application. The transporting of abattoir waste and by-products must comply with the requirements of the applicable Local and National Legislation.</p> <p>4.2. Standard operating procedures for the</p>

		<p>4.2. Diere afval, bevat groot hoeveelhede EColi, wat in die ingewande van diere aangetref word. E. coli O157:H7, veroorsaak diaree en kan nier versaking veroorsaak. E.coli gaan verseker die omgewing, en grondwater besoedel.</p> <p>4.3. Oewerkonyn: Die omgewing is n ekologiese sensitiewe area, en aangrensend aan die voorgestelde perseel is n riviertjie was baie maklik besoedel kan word. In hierdie area kom die bedreigde en seldsame oewerkonyn voor. Die impak van so n aanleg sal katastrofiese gevolge vir die bedreigde konyn se voortbestaan hê. Sien aangeheg beskrywing oor sy habitat: "It is found in only a few places in the Karoo Desert of South Africa's Northern Cape Province, none of them being a protected area. As its name suggest, the Riverine rabbit prefers to occupy river basins and very particular shrubland. The rabbit feeds on the dense shrubland and the soft soil allows for it to create vast burrows and dens for protection, brooding young, and thermoregulation."</p> <p>4.4. Vlieë- Dit is bekend dat sulke aanlegte altyd n stryd het omvlieë te beheer. Vlieë vermenigvuldig vinnig, en die omvang van die skade wat dit aanrig aan dierekuddes, en ergernis wat dit veroorsaak is</p>	<p>composting facility has been developed and included in the EMP to ensure that site hygiene is maintained. The facility will have to comply with the requirements and conditions identified through consultation with key departments such as BGCMA, Cape Nature and DEADP to ensure that groundwater resources are not contaminated through activities conducted at the facility. The facility will be required to obtain the required authorisations for the activities conducted in site.</p> <p>4.3. According to Cape Nature - the distribution of the Riverine Rabbit "Oewerkonyn" falls outside of the Western Cape, however populations have been discovered in the districts of Touwsrivier, Montagu, Barrydale as well as Klarstroom. The rabbit's are habitat-specific and are found in dense patches of riverine bush along seasonal rivers. Please note that the main threats to the rabbit is habitat destruction through cultivation and extensive livestock farming. Which is exactly the current zonation and land use of the property. Source: http://www.capenature.co.za/fauna-and-flora/riverine-rabbit/</p> <p>4.4. Your concern regarding the flies has been duly noted. A number of SOP's have been</p>
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		<p>onvermydelik. Vandat die applikant begin het om kompos te verwerk op die bestaande perseel is die vlieë merkbaar meer. Vlieë, van die <i>diptera</i> orde, vermenigvuldig vinnig, is die draer van siektes as gevolg van die metode waarop hulle kos verteer.</p> <p>4.5. <u>Vragmotors-</u> Die applikant sal van groot vragmotors gebruik maak om die afval van die perseel te vervoer. Die pad is egter nie ontwerp vir die langdurige gebruik deur swaar voertuie nie, en gevolglik sal die pad gou onbegaanbaar vir gewone motors wees. Swaar vragmotors sal skade aan die pad aanrig, en is ook n gevaar vir die inwoners van die streek, aangesien die pad baie smal is. Die omliggende besighede se kliente (soos bo genoem) gebruik ook gereeld hierdie pad. Funksies en feeste word gereeld by omliggende plasie en persele gehou.</p> <p>4.6. <u>Waarde van eiendom-</u> Indien so n aanleg vanaf die voorgestelde perseel bedryf sou word, sal dit n verlaging in waarde van die omliggende eiendom tot gevolg hê. Niemand wil n eiendom besit waar vlieë jou onophoudelik lastig val, die reuk van so n aanleg en moontlike besoedeling van die omgewing en grondwater n wesentlike gevolg is nie.</p>	<p>developed and are included in the EMP for implementation during operation. The SOP's provide strict control of site activities to mitigate the presence of pests. An anti-fly programme has been implemented to eradicate fly larvae, and a number of pest control measures such as the application of Baycidal and Neoprex and the installation of flytraps around the facility has been implemented to control the number of flies.</p> <p>4.5. There The Abattoir by-products (blood, "pensmis", and minimal carcasses) are gathered on the Abattoir property in the industrial area of Robertson. This is transported in dedicated blood tanks (honey suckers) and skip trucks daily to the application site. The number of trips are/will be:</p> <ul style="list-style-type: none"> • Honey suckers with blood: once per day • 8 ton skip trucks (truck with tank on top): approx. every second day • No trip on weekends, except in emergency cases • Sheep will be transported in livestock trucks to/from the site once a day. • Most of the trip length will be on tar road (R60 and DR 1384), with only 2km on DR 1377 (gravel) that will create dust.
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		<p>4.7. <u>Reuke:</u> Ek haal aan uit <u>Prof. W Du Plessis se studie oor Die beskikking van dierkarkasse as afval:</u> NEMAQA Waar afval in groot maat gekomposteer word, kan daar in sommige gevalle die risiko van ammonium, metaan en ander potensieel skadelike organiese stowwe ontstaan. Gevolglik vereis NEMAQA376 dat, vir enige komposaktiwiteit wat die prosessering van meer as 1 ton dierweefsel insluit, daar vir 'n AEL aansoek gedoen moet word. Die heersende winde in die area is hoofsaaklik suidoostelik en Noordwestelik a.g.v. die bergreeks. Gevolglik sal die reuke wegdryf na die omliggende plase.</p> <p>Ek staan die ontwikkeling van die beplande aanleg teë.</p> <p>Die ontwikkeling sal verseker n negatiewe impak op die omgewing, die gemeenskap en waarde van omliggende eiendomme en besighede hê.</p>	<p>The two to three additional trips daily will not have an additional substantial impact if compared to the surrounding environment:</p> <ul style="list-style-type: none"> • The R60 carries many trucks between Robertson and Worcester and the railway line runs adjacent to the road; • DR 1384 (tar road) between the R60 and the lime quarry carries many and much heavier trucks to and from the quarry to the lime industry adjacent to the R60; • The lime factory/industry itself creates much noise and dust from their 20/25 ton trucks alongside the R60; and • DR 1377 (gravel road) between Rooiberg Cellar and Nuy carries many trucks from wine farmers, sheep/cattle farmers, and a brewery on a daily basis. The two gates to the application site were placed approximately 20m inside the boundary of the application site to prevent any obstructions by trucks in road DR 1377. <p>4.6. Through proper management of the facility and the strict licence conditions that the facility will have to comply with will ensure that the facility will not operate in such a manner as to create undue nuisance to the receiving environment. The resulting odour from the facility should not differ from the</p>
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			<p>odour that may come from any other livestock farm situated within 5 km from the facility. It is therefore not likely that the facility will affect the worth of property.</p> <p>4.7. The legislation as referred to in your comment has been repealed. The activity does not require an AEL. SOPs have been developed to ensure that the facility is operated in such a way as to not create any undue odour / nuisance.</p> <p>Your objection against the facility is duly noted.</p>
BGCMA Ms. N. Feni	17/08/2017	<p>The Breede -Gouritz Catchment Management Agency has assessed the documents and has no objection to the proposed activity provided the following conditions are considered prior the implementation of the activity.</p> <p>Water Supply</p> <ul style="list-style-type: none"> • Non-compliance investigation letter issued on the 02 May 2017 to Mr H. Van Bob regards the possible illegal construction of an existing dam must be addressed prior the commencement of the activity. Section 21(a) ,(b) and any other water use attached that are not registered on 	<p>Water Supply</p> <ul style="list-style-type: none"> • Umsiza provided a response to DWAF on the 09 September 2013 in response to a pre-directive to issue a notice of non-compliance in terms of section 21 of the NWA. • Please see the existing authorisation in Appendix E2.

		<p>WARM system must be applied for;</p> <ul style="list-style-type: none"> • Should an applicant has an ELU, permit, Enlistment from Water User Association or Licence of the existing dam, the BGCMA request to be provided with that information; • Details pertaining to the source, availability and quality of the water required for the proposed project must be investigated to ensure that there is enough supply to cater for this proposed development; • The current water use on the property for agricultural purpose must be amended to Agro-industrial use with this office within 30 days upon obtaining an Environmental Authorization; • If a dam exceeds 5m high and storage capacity of 50 000, triggers water use authorization in term of Section 21(b) of the National Water Act, 1998 and qualifies for dam safety regulation. The applicant is advised to submit an application to a Dam Safety Officer for a dam to be classified; <p>Storm water management</p> <ul style="list-style-type: none"> • The stormwater management plan for the proposed activity must be developed taking into consideration the anticipated ingress of siltation on the water resource and/or any drainage area within the site. The stormwater management plan should also consider soil 	<ul style="list-style-type: none"> • Please see the Freshwater Ecological Impact Assessment and the Risk Assessment Matrix in Appendix G1 and G2 • Noted. • The storage of water authorised is 50 000m³, in 2 (two) dams. This therefore does not trigger the requirement for the dam to be classified by a dam safety officer. <p>Storm water management</p> <ul style="list-style-type: none"> • A storm water management plan is included as part of the site development plan in Appendix B1. • Noted, please refer to Appendix B1. • The size of the retention dam has been calculated based on long-term rainfall data for
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		<p>erosion impacts and the downstream water users and impacts must be properly identified and mitigated. Measures must be taken to control and mitigate any activity that may detrimentally impact both the surface water resource and downstream water users;</p> <ul style="list-style-type: none"> • Clean and dirty stormwater must be separated. Please detail where will the dirty storm water from contaminated area be conveyed to; • All reasonable measure must be taken to prevent contaminated stormwater overflowing from any storage dam entering water resource; <p>Waste management</p> <ul style="list-style-type: none"> • Details of the volume of waste to be disposed, designs and capacity of the collection dam must be provided. Filter trap or screening should be installed to ensure that the capacity of the dam is not compromised by slurry or sludge; • All information pertaining to the waste management on site, including the existing sewer infrastructure & any proposed facilities must be detailed and taking into account the personnel that will be expected to be on site, its locality to the water resource, proposed designs, and an agreement must be reached with the service provider for any collections, transportation and disposals of sewer contents that may be anticipated; 	<p>the area. The dam will be able to collect 6 000m³ of runoff which can be re-used on the compost heaps. An additional overflow for the dam has been included to accommodate heavy rainfall events. Please see the Soil Study in Appendix G3.</p> <p>Waste Management</p> <ul style="list-style-type: none"> • Noted. Please see Appendix B1. • Noted.
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		<ul style="list-style-type: none"> • Suspended solids must be removed from collection dam, and the resulting sludge disposed of at the registered Wastewater Treatment Works; • A Soil Analysis Study and Water Quality Management Impact Report must be conducted to assess risk associated to waste management (e.g. compact facility, vehicle type & capacity and transportation of waste from abattoir to compost facility). • Please provide details of the compost surface area. For compost facility, a concrete slab or bundled area may be appropriate to prevent soil, surface water or groundwater contamination during wet season. Compost should be stored in a protected area where it will not waste down to water resource. Such facility should be located in a regulated area. • The Geotechnical assessment must be utilised to give indication about the geology of the proposed development site, and the typical construction material and associated choice of structure(s) (particularly sewer pipelines. barrier berms to divert to water resource and such) that will be suitable as per the geology of the area of the proposed development; • Integrated Waste Management Plan must be conducted to explain how waste management (e.g. waste stream, sewage management and storm water) will be managed; 	<ul style="list-style-type: none"> • Noted. • Please see relevant Assessments in Appendix G of the BAR. Recommendations from the assessments have been incorporated into the BAR and EMPr. • Please see the site development plan in Appendix B1 indicating the composting area in relation to the watercourses on site. None of the composting activities are conducted within the regulated area as defined in Section 21 (c) and (i) of the regulations. However the feedlot is situated in the regulated area. As such an application has been submitted. See Appendix E3. • Please see details in the Soil study in Appendix G3 as well as Freshwater Ecological Impact Assessment and Risk Assessment Matrix in Appendix G1 and G2. • Please refer to Section F Part 2 in the BAR.
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		<ul style="list-style-type: none"> • Should the proposed activity take place within 1:100 or 100 metres from any water resource or within 500 metres of the wetland, known as the regulated area, a water use activity as in accordance with Section (c & i) water uses may be triggered and such an activity must be applied for to this office for an authorisation; • This will required Freshwater study, that must be prepared by a Fresh water Ecologist; Please be advised that no activities may commence without the appropriate approvals/authorisations where needed from the responsible authority. The onus remains with the registered property owner to confirm adherence to any relevant legislation that such activities might trigger and/or need authorisation for. 	<ul style="list-style-type: none"> • Noted please see the activities in relation to the regulated area. All activities that fall within the regulated are will be applied for. • Please see Freshwater Ecological Impact Assessment and Risk Assessment Matrix in Appendix G1 and G2. Recommendations have been incorporated in the BAR and EMPr.
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CORRESPONDANCE RECEIVED - SUBMISSION OF NID'S



DIRECTORATE: DEVELOPMENT MANAGEMENT

(REGION 2)

REFERENCE: 16/3/3/6/7/1/8/1/4/1347/16
ENQUIRIES: D. Matthews
DATE OF ISSUE: 2016-12-12

The Board of Director
South African Farm Assured Meat Group cc
P. O. Box 895
ROBERTSON
6705

Attention: Mr D. Houghton

Tel: (023) 626 6320
Fax: (023) 626 6040

Dear Sir

ACKNOWLEDGEMENT AND ACCEPTANCE OF THE NOTICE OF INTENT TO SUBMIT AN APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998) ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 FOR THE PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY ON THE REMAINDER OF FARM MIDDELBERG NO. 10, ROBERTSON

1. The correspondence dated 2 December 2016, as received by the Department on the same day, refers.
2. Following the review of the information submitted to this Department, the following is noted:
 - 2.1 The proposal entails the development of a compost facility to recycle and treat abattoir and organic waste to produce compost on approximately 7,5ha of land. Construction of stormwater cut-off drains and a collection dam to contain and store all stormwater generated on site for reuse and recycling onto the compost rows as part of the treatment and compost making process.

Process

3. A Basic Assessment must be followed in order to apply for Environmental Authorisation. Only those activities applied for shall be considered for authorisation. The onus is on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.
4. You are advised that when undertaking the Basic Assessment process, you must take into account the applicable guidelines including the guidelines developed by the Department. The Department's guidelines can be downloaded from the Department's website (<http://eadp-westerncape.kznsrf.gov.za/you-resource-library>). In particular, the guidelines that may be applicable to the proposed development include, inter alia, the following:
 - > Circular EADP 0026/2014: One Environmental Management System
 - > Guideline for the Review of Specialist Input in the EIA process (June 2005).
 - > Guideline for Environmental Management Plans (June 2005).
 - > Guideline on Alternatives (March 2013).
 - > Guideline on Need and Desirability (March 2013).

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5. Please ensure the Basic Assessment Report ("BAR") and Environmental Management Programme ("EMP") contain all information requirements outlined in Appendices 1 and 4 respectively of GN R, 962.

Public Participation

6. A public participation process ("PPP") that meets the requirements of Regulation 41 of the EA Regulations, 2014 must be undertaken. You are advised that public participation may be undertaken prior to the submission of the application, although this is not mandatory. It is the Environmental Assessment Practitioner's discretion at what stage the requirements of Regulation 41 are met, whether during the proposed application (pre-application) process or formal application process. You are reminded that a period of at least 30 days must be provided to all potential or registered interested and affected parties to submit comment on the BAR and EMP.
7. Should a public participation process, which includes the circulation of the pre-application BAR for comment, be undertaken prior to submission of an Application Form to the Department, in terms of Regulation 40, the pre-application BAR may also be submitted to the Department for commenting purposes. Please ensure a minimum of two printed copies of the pre-application BAR is submitted to the Department for commenting purposes.
8. In terms of Section 240 (2) and (3) of NEMA and Regulations 7(2) and 43(2) of the EA Regulations, 2014, any State Department that administers a law relating to a matter affecting the environment relevant to the application must be requested to comment within 30 days. **Please note that the Environmental Assessment Practitioner ("EAP") is responsible for such consultation.** Therefore, it is requested that the EAP include proof of such notification to the relevant State Departments in terms of Section 240 (2) and (3) of NEMA in the BAR, where appropriate.
9. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for undertaking it. Failure to comply with the requirements of Section 24F of the NEMA shall result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
10. Please note that the pre-application consultation is an advisory process and does not pre-empt the outcome of any future application which may be submitted to the Department. No information provided, views expressed and/or comments made by officials during the pre-application consultation should in any way be seen as an indication or confirmation:
- that additional information or documents will not be requested of the outcome of the application.
11. The Department reserves the right to revise or withdraw comments or request further information based on any information received.

Yours faithfully


P. Moeke

HEAD OF DEPARTMENT

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

CC: (1) Ms L. Abrahams (Eco Impact Legal Consulting (Pty) Ltd)
(2) Ms T. Bunting (Jongeborg Municipality)

Fax: (085) 221 471 1660
Fax: (023) 414 1841



BETTER TOGETHER

DIRECTORATE: WASTE MANAGEMENT

GARY ARENDSE

Gary.Arendse@westerncape.gov.za

REFERENCE: 19/2/5/7/81/14/WL0013/17

The Board of Directors
SA Farm Assured Meat Group
P.O. Box 895
ROBERTSON
6705

Tel: (023) 626 6320

Fax: (023) 626 6040

Email: david@robab.co.za

For attention: Mr. David Houghton

Dear Sir

ACKNOWLEDGEMENT OF RECEIPT OF THE NOTICE OF INTENT TO SUBMIT AN APPLICATION FOR THE BASIC ASSESSMENT FOR THE PROPOSED ABATTOIR COMPOST FACILITY ON REMAINDER OF FARM MIDDLEBERG 10, ROBERTSON

1. The above-mentioned document, dated 8 February 2017, which was received by this Department on 10 February 2017, refers.
2. This letter serves as an acknowledgment of receipt of the aforementioned document by the Directorate: Waste Management.
3. Following the review of the information submitted to this Department, the following is noted:
4. The development will entail the construction and establishment of a compost facility to recycle and treat abattoir and organic waste, to produce compost, on approximately 7.5 ha. Furthermore, storm water cut-off channels and a collection dam to contain and store all storm water generated on site for reuse and recycling onto the compost rows, as part of the treatment and compost-making process, will be constructed.

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5. This Department has reviewed the Notice of Intent and agrees with the following Category A listed activities applied for, as listed in Government Notice (GN) No. 921 'List of waste management activities that have, or are likely to have, a detrimental effect on the environment' of 29 November 2013, namely,

3(6) 'The treatment of general waste using any form of treatment at a facility that has the capacity to process in excess of 10 tons but less than 100 tons' and

3(12) 'The construction of a facility for a waste management activity listed in Category A of this Schedule (not in isolation to associated waste management activity).'

6. Having considered the information contained in the Notice of Intent, this Department has identified the following listed activities that are additionally applicable to the proposed development:

Category C 5(1) 'The storage of general waste at a facility that has the capacity to store in excess of 100m³ of general waste at any one time, excluding the storage of waste in lagoons or temporary storage of such waste.'

Category C 5(2) 'The storage of hazardous waste at a facility that has the capacity to store in excess of 80m³ of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or temporary storage of such waste.'

Kindly note, these activities do not require a Waste Management Licence, but the Licence Holder must comply with the relevant requirements or standards i.e. (GN) No. 926 of 29 November 2013 'Norms and Standards for Storage of Waste'.

7. You are hereby advised that only those activities applied for will be considered for authorisation. The onus is on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the EIA process. Should you confirm that the above activities are indeed not applicable then you need state this in writing; and submit the correct listed activities with the Application Form and ensure that in the Basic Assessment Report all the applicable activities are assessed.
8. Please take note of the following advice of the nature and extent of the processes that must be followed in order to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as amended, the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM: WA), as amended, and the Environmental Impact Assessment Regulations 2014 as published in GN R982 of 4 December 2014.
9. Exemption
- 9.1. It is evident that you do not intend to apply for exemption from any provisions contained in the EIA regulations, NEM: WA or NEMA. Please note that should you fail to meet a requirement of the Regulations or NEMA and if no exemption from that provision was applied for, your Basic Assessment Report (BAR) may be rejected.

- 9.2. Should you therefore still wish to apply for exemption from any provisions of the EIA regulations, then you need to complete the separate Exemption Application form available on the Department's website (<https://www.westerncape.gov.za/eadp/your-resource-library>).
- 9.3. Please note further that prior to completing and submitting such application for exemption, you must first comply with Regulation 4(4) of GN No. R 994 of 8 December 2014. Regulation 4(4) requires that the applicant or EAP must communicate his or her intention to apply for exemption by giving notice in the manner prescribed in sub-regulation 4, to the land owner or person in control of the land and all potential or registered interested and affected parties, as the case may be, if an application for exemption is to be applied for from a provision that needs to be met prior to a waste management licence being issued then you may not continue with the EIA Process without having received an exemption notice from the Competent Authority exempting you from having to meet that legislative requirement.
10. Alternatives
- 10.1. Be advised that in terms of the EIA Regulations and NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that the Department may grant a waste management licence for an alternative as if it has been applied for or may grant a waste management licence in respect of all or part of the activity applied for as specified in the Regulations of GN No. R. 982 of 4 December 2014.
- 10.2. Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives. You are hereby reminded that it is mandatory to investigate and assess the option of not proceeding with the proposed activity (i.o.w. the "no-go" option) in addition to other alternatives identified. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the option of not proceeding, is required during the assessment. What would, however, be required in this instance is that proof of the investigation undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the no-go option exist must be provided to the Department. Refer to the Department's Guideline on Alternatives available on the Department's website (<https://www.westerncape.gov.za/eadp/your-resource-library>)
11. Public Participation
- 11.1. Please be advised that according to Regulation 41(2) of GN 982 of 4 December 2014 the person conducting a public participation process must "take into account any guidelines applicable to public participation". The Department's Guideline on Public Participation (March 2013) must therefore be studied and must be taken into account. This guideline was compiled to provide guidance on the procedure to be

followed when conducting the public participation process and includes, inter alia, notification of interested and affected parties (I&APs).

11.2. The EAP has indicated that they will notify and submit reports to the following State Departments and Organs of State:

- Cape Winelands District Municipality
- Cape Nature
- DEA&DP: Air Quality Management
- DEA&DP: Pollution Management
- DEA&DP: Waste Management
- Department of Agriculture, Western Cape
- Department of Health: Western Cape
- Department of Water and Sanitation
- Breede-Gouritz Catchment Management Agency
- Heritage Western Cape
- Langeberg Local Municipality

11.3. In terms of good environmental practise you are encouraged to engage with State Departments and other Organs of State in the pre-application phase or early in the EIA process to solicit their inputs on any of their requirements to be addressed in the EIA process. Please note that this does not replace the requirement of making the draft BAR available to State Departments as stipulated above.

11.4. The practitioner must record and respond to all comments received. The comments and responses must be captured in a Comments and Responses Report and must also include a description and chronological order of the public participation process followed. This report must also be included in the public participation information to be attached to the BAR.

11.5. It must, however, be noted that the NEM: WA specifies additional requirements that must be met in addition to the requirements specified in NEMA and the EIA regulations for a Basic Assessment or Scoping and EIA process (e.g. in taking steps to bring the application to the attention of the relevant Organs of State, interested persons and the public, one of the steps must include the publication of a notice in at least two newspapers circulating in the area in which the waste management activity applied for is to be carried out).

12. Environmental Management Program (EMP)

12.1. In accordance with Section 24N of NEMA and the Regulation the Competent Authority hereby requires the submission of an Environmental Management Programme ("EMP"). The contents of such an EMP must meet the requirements outlined in Section 24N (2) & (3) of the NEMA and Appendix 4 of the EIA Regulations 2014. The EMP must address the potential environmental impacts of the activity throughout the project life cycle including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). The EMP must be submitted together with the BAR.

13. Guidelines

13.1. You are advised that when undertaking the EIA process you must take into the account the applicable guidelines including the guidelines developed by the Department. The Department's guidelines can be downloaded from the Department's website (<https://www.westerncape.gov.za/eodp/your-resource-library>). In particular, the guidelines that may be applicable to the proposed development include, inter alia, the following:

- Guideline for Environmental Management Plans (June 2005)
- Guideline on Public Participation (March 2013)
- Guideline on Alternatives (March 2013)
- Guideline on Need and Desirability (March 2013)
- Guideline on Exemption Applications (March 2013)

14. Services

14.1. Since water supply, solid waste disposal and electricity services will be provided by the Municipality, you are requested to provide this office with written proof that the Municipality has sufficient capacity to provide the necessary services to the proposed development. Confirmation of the availability of services from the service providers must be provided together with the BAR.

15. Climate change: Energy efficiency / Water saving

15.1. One of the objectives of the Western Cape Provincial Spatial Development Framework published by this Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity and land. To this effect and as part of the efforts to reduce the effects of climate change, you must as part of the waste management licence process identify energy efficient technologies (e.g. the use of low voltage or compact fluorescent lights instead of incandescent globes, maximising the use of solar heating, etc.) that could be implemented for the proposed development. Considering that South Africa is a water scarce country and that many catchments in the Western Cape are already water stressed, you must also consider implementing the use of water saving devices and technologies (e.g. dual flush toilets, low-flow shower heads and taps, etc.) for the proposed development. The above must be reported on in the BAR.

15.2. It is also recommended that you prepare a water demand management, water conservation and storm water management plan and submit this plan with the BAR. This plan must include, but not be limited to: the management of storm water; the capture and use of rainwater from gutters and roofs; use of locally indigenous vegetation during landscaping and the training of staff to implement good housekeeping techniques.

- 15.3. This Department further wish to inform you that consideration must be given to ways to minimise waste and wastage in the design, construction and operational phase of the proposed development. Your attention is therefore drawn to the Department's Waste Minimisation Guideline for Environmental Impact Assessment Reviews (May 2003), available from the Competent Authority on request. The Guideline raises awareness to waste minimisation issues and highlights waste and wastage minimisation practices. In particular, it is recommended that Part B be considered as it covers general waste and wastage minimisation and general construction activities. It is important to remember that a recycling programme must adopt the cradle-to-grave approach.
16. Need & desirability, including the strategic context
- 16.1. In terms of the NEMA EIA Regulations, when considering an application, the Competent Authority must take into account a number of specific considerations including inter alia, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the BAR. The BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability. Refer to the Department's Guideline on Need and Desirability (March 2013) available on the Department's website (<https://www.westerncape.gov.za/eacdp/your-resource-library>)
- 16.2. In terms of having to consider need and desirability, it must be noted the final environmental decision will, inter alia, be informed by town planning considerations, informed by inter alia the Provincial Urban Edge Guideline (December 2005) and the Western Cape Provincial Spatial Development Framework (2014) (WCPSDF). The Competent Authority requires that you demonstrate in the BAR the strategic context of the site specific proposed development in relation to the broader surrounding area. You will need to demonstrate, amongst others, whether the proposed development is line with Departmental policies/guidelines such the Western Cape Provincial Spatial Development Framework, urban edge for the area or whether, in the absence of an urban edge, whether it is located within the built-up edge of the town.
17. General
- 17.1. In addition to the above, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and show how the proposed development meets the requirements of sustainable development.
- 17.2. The Waste Management Additional Information Annexure must be completed and submitted together with the BAR.
- 17.3. You are hereby advised that the BAR must contain all the information outlined in Regulations Appendix 1 of GN. R 982 of 4 December 2014 and must also include the information requested in this letter; omission of any of the said information may result in the BAR being refused.

- 17.4. Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- 17.5. Please note that the activity may not commence prior to a Waste Management License being issued by the Department. It is an offence in terms of Section 20 (b) of the NEM: WA for a person to commence, undertake or conduct a waste management activity, except in accordance with a Waste Management License issued in respect of that activity, if a License is required. Failure to comply with the requirements of Section 20 (b) of the NEM: WA will result in the matter being referred to the Directorate: Environmental Governance of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
- 17.6. The Department reserves the right to revise initial comments and request further information based on the information received.

Yours faithfully



LANCE MCBAIN-CHARLES

DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING

DATE: 2017/2/16

CC: Nicolaas Henskam (Eco-impact Legal Consulting Pty Ltd)

Fax: (088) 021 671 1660

Email: admin@ecoimpact.co.za

COMMENTS RECEIVED - REGISTRATION PERIOD



DIRECTORATE: WASTE MANAGEMENT
GARY ARENDSE
Gary.Arendse@westerncape.gov.za

REFERENCE: 19/2/4/2/81/14 FARM MIDDLEBERG

The Board of Directors
SA Farm Assured Meat Group
P.O. BOX 895
ROBERTSON
6705

Tel: (023) 626 6320/ (082 579 5231)
Email: david@robab.co.za

For attention: Mr David Houghton

INVESTIGATION OF A COMPLAINT WITH REGARD TO NUISANCE CONDITIONS AT AN ABATTOIR COMPOST FACILITY, REMAINDER OF FARM MIDDLEBERG 10, ROBERTSON

1. To respond to a complaint received on 24 March 2017 with regard to alleged nuisance conditions of the Robertson Abattoir Composting Facility. A site inspection was conducted on 30 March 2017 by an official from the Department, Gary Arendse from the Directorate: Waste Management. Mr David Houghton, the Chief Operating Officer, accompanied the Departmental official at the Facility during the inspection.
2. The following observations were made:
 - 2.1 On the day of the investigation, irregular odours were not noticed at the Facility.
 - 2.2 The Facility, however, had a large amount of flies evident during the inspection, which could create a nuisance.
 - 2.3 In order to track how far outside of the Facility flies were still noticeable, two reference points were selected alongside the dirt road to the facility, the first reference point approximately 50m and the second approximately 100m down the road from the Facility. It was noticed that at the 50m reference point, the amount of flies were considerably less, while flies were barely noticeable at the 100m reference point.
 - 2.4 The Facility is in the process of applying for a Waste Management Licence (WML), which will have strict conditions to operate the Facility. The Department will ensure that the Facility stay compliant with the operating conditions of their licence, should it be granted, and in so doing, minimize negative impacts on the environment.

3. The Department recommends the following:

- 3.1 Mitigation measures must immediately be put in place to prevent odour and fly nuisances from becoming concerns in future.
- 3.2 The Chief Operating Officer must supply the Department with monthly feedback in order to establish whether the implemented mitigation measures are successful.
- 3.3 Abattoir waste must immediately be covered at the compost facility in order to prevent it attracting vermin and creating odours.

- 4. On 31 March 2017, Mr David Houghton, reported that 19 (nineteen) fly traps were purchased and will be put up on the boundary of the Facility. They will also meet with Ecolab and Coopers in order to establish which chemical to use to control the flies on the property.
- 5. In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as amended, a person convicted of an offence/charge of unlawfully and intentionally or negligently significantly polluting or degrading or detrimentally affecting the environment in terms of the aforementioned legislation is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
- 6. The Department reserves the right to revise initial comments and request further information based on new information received.

Yours faithfully,



LANCE MCBAIN-CHARLES

DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING

DATE: 2017/4/21

Lauren Abrahams

From: Nicole Loebenberg <nicole@ecoimpact.co.za>
Sent: Monday, March 20, 2017 10:58 AM
To: Mossie Basson; admin@ecoimpact.co.za
Subject: RE: proposed abattoir compost facility - Middleberg 10 ROBERTSON

DEADDP REFERENCE NUMBER: 16/3/3/8/7/1 81 14/1347/16
DEA & DP WASTE MANAGEMENT REFERENCE NUMBER: 19/2/5/7/ 81 /14/WL0013/17
ROBERTSON MEAT ASSURED PROPOSED ABATTOIR COMPOSTING FACILITY

Good day My Basson

We herewith acknowledge receipt of your email and confirm that you are registered on our database as a I&AP for the above mentioned project.

A copy of the Basic Assessment Report will be sent to you for comment as soon as it becomes available.

Kind regards

Nicole Loebenberg
Environmental Compliance

eco
impact

Eco Impact Legal Consulting (Pty) Ltd

Reg: 2010/015546/09

P.O. Box 450370

Claremont

South Africa

7731

Office: +27 (0) 21 671 1600

Fax: +27 (0) 21 671 9976

Email: nicole@ecoimpact.co.za

Web: www.ecoimpact.co.za

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From: Mossie Basson [<mailto:Mossie@grahambeckwines.com>]
Sent: 17 March 2017 07:57 AM
To: admin@ecoimpact.co.za
Subject: proposed abattoir compost facility - Middleberg 10 ROBERTSON

Dear Lauren Abrahams

I refer to notice on Farm Gate, Middleberg 10 . ref DEA/DP 16/3/3/8/7/1 81 14/1347/16 and DEA/DP waste Management Ref 19/2/5/7/ 81 /14/WL0013/17 and would like to have detailed information regarding this development to refer to our Conservancy (Roosburg Breederwiel Conservancy) management committee regarding possible input towards said development.

A detailed draft can be forwarded to me at Mossie@grahambeckwines.co.za as soon as possible

Regards Mossie Basson



MOSSIE BASSON Conservation Manager
M 082 885 1470 E mossie@grahambeckwines.com



GRAHAM BECK WINES
Wine & Spirits

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www.grahambeckwines.com

Bevies e la [Facebook](http://www.facebook.com/grahambeckwines)

Folow us on [Twitter](http://www.twitter.com/grahambeckwines)

See Us [YouTube](http://www.youtube.com/grahambeckwines) (in videos and)

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Folow us on [Twitter](http://www.twitter.com/grahambeckwines)

See Us [YouTube](http://www.youtube.com/grahambeckwines) (in videos and)

Graham Beck Wines and Plettenberg Winery are proud members of the wine division of Graham Beck Holdings, the world-famous wine, beer and food company, members of the Beck family in South Africa. Please consider the environment before printing this email. This e-mail is added to a database, available at www.grahambeckwines.com/contact-us.html

Lauren Abrahams

From: Yolande Henstock <yolande@ecoimpact.co.za>
Sent: Monday, April 10, 2017 11:03 AM
To: 'Louis Jordan'
Cc: 'Lauren Abrahams'; 'Nicole Loebenberg'
Subject: RE: I&AP registration.

DEADDP REFERENCE NUMBER: 14/3/1/6/7/1 B1 14/1347/18
DEA SGP WASTE MANAGEMENT REFERENCE NUMBER: 18/2/5/7/ B1 /14/WL0013/17
ROBERTSON MEAT ASSURED PROPOSED ABATTOIR COMPOSTING FACILITY

Dear Mr Jordan,

We herewith acknowledge receipt of your email and confirm that you are registered on our database as a I&AP for the above mentioned project.

Kind Regards,

Kind regards

Yolande Henstock
Administration



Eco Impact Legal Consulting (Pty) Ltd
Reg: 2016/01566487
P.O. Box 45079 Office: +27 (0) 21 671 8000
Cape Town Fax: +27 (0) 21 671 8076
South Africa Email: yolande@ecoimpact.co.za
T155 Website: www.ecoimpact.co.za

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From: Louis Jordan <louis@grahambeckentwinnes.co.za>
Sent: 10 April 2017 09:57 AM
To: admin@ecoimpact.co.za
Subject: I &AP registration.

DEADDP REFERENCE NUMBER: 14/3/1/6/7/1 B1 14/1347/18
DEA SGP WASTE MANAGEMENT REFERENCE NUMBER: 18/2/5/7/ B1 /14/WL0013/17
ROBERTSON MEAT ASSURED PROPOSED ABATTOIR COMPOSTING FACILITY

With reference to above I would like to register as interested and affected party.

Kind Regards

LOUIS JORDAN Operations Manager
M 082 676 3006 E louis@grahambeckentwinnes.co.za

**GRAHAM BECK WINES**
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Lauren Abrahams

From: Yolande Henstock <yolande@ecoimpact.co.za>
Sent: Tuesday, April 11, 2017 2:52 PM
To: 'Banner Jooste'
Cc: 'Lauren Abrahams', admin@ecoimpact.co.za
Subject: RE: Interested and Affected Party Registration

DEA&DP REFERENCE NUMBER: 16/3/38/7/1 BI 14/1347/16

DEA &DP WASTE MANAGEMENT REFERENCE NUMBER: 19/2/5/7 BI /14/W1001/17

ROBERTSON MEAT ASSURED PROPOSED ABATTOIR COMPOSTING FACILITY

Good Afternoon,

I hereby acknowledge your email, and confirm that you have been registered as an interested and affected party for the project.

A CD copy of the report will be sent to you as soon as it becomes available.

Please do not hesitate to contact us should you have any questions.

Kind regards

Yolande Henstock
Administration

The logo for eco impact, with 'eco' in a lowercase sans-serif font and 'impact' in a larger, bold lowercase sans-serif font, both in a dark grey color.

Eco Impact Legal Consulting (Pty) Ltd
Reg. 2010/0644937
P.O. Box 48076 Office: +27 (0) 21 471 1889
Claremont Fax: +27 (0) 21 471 8076
South Africa Email: yolande@ecoimpact.co.za
1738 Web: www.ecoimpact.co.za

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From: Banner Jooste [<mailto:bannerjooste@gmail.com>]
Sent: 11 April 2017 11:39 AM
To: admin@ecoimpact.co.za
Subject: Interested and Affected Party Registration

DEA&DP REFERENCE NUMBER: 16/3/38/7/1 BI 14/1347/16

DEA &DP WASTE MANAGEMENT REFERENCE NUMBER: 19/2/5/7 BI /14/W1001/17

ROBERTSON MEAT ASSURED PROPOSED ABATTOIR COMPOSTING FACILITY

With reference to the above, please register me as an interested and affected party.

Banner Jooste
Doornkloof Private Nature Reserve

Lauren Abrahams

From: Gerber <gerberl@vodamail.co.za>
Sent: Friday, March 03, 2017 3:24 PM
To: 'Lauren Abrahams'
Subject: RE: Robertson abattoir Compost Facility

Hi Lauren

You can post me a cd to:

P.A. GERBER
P.O. BOX 837
WELLINGTON
7654

Please don't register it because we live on a farm and can't receive mail by day.

Regards
P.A Gerber
082-2136120

From: Lauren Abrahams [<mailto:lauren@ecoinvest.co.za>]
Sent: 03 March 2017 03:06 PM
To: gerberpa@vodamail.co.za
Subject: Robertson abattoir Compost Facility
Importance: High

Good afternoon Mr. Gerber,

I hereby confirm your registration as an interested and affected party regarding the Proposed Robertson Abattoir Compost Facility.

As an interested and affected party you will be provided with access to the Basic Assessment Report and Appendices for comment. Please note that the proposal is still in the registration phase, and the documents will be sent to all registered interested and affected parties as well as key departments once they have been compiled.

If you would like to receive a CD copy of the above mentioned documents please provide me with your postal address at which we can send it to once available.

Alternatively I can send you a link to our website on which you can download the documents once they are available.

I trust the above is in order, please feel free to contact me should you require any additional information.

Please acknowledge receipt.
Kind regards,

Lauren Abrahams

The logo for Eco Impact Legal Consulting (Pty) Ltd. The word "eco" is in a smaller, lowercase font, and "impact" is in a larger, lowercase font, both in a sans-serif typeface.

Eco Impact Legal Consulting (Pty) Ltd

Reg: 2010/013546/07

P.O. Box 45070

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Office: +27 (0) 21 671 1666

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www.avast.com

Lauren Abraham

From: Nicole Lockberg <nlock@ecoimpact.co.za>
Sent: Monday, March 20, 2017 10:55 AM
To: 'Le Ross Fourie', Johan & Mark Fourie
Cc: admin@ecofarm.co.za
Subject: RE: Proposed Abattoir/Compost Facility on Remainder of Middelburg 10, Robertson

DEADLINE REFERENCE NUMBER: 16/15/16/01 RE 16/1387/16
DEA&DP WASTE MANAGEMENT REFERENCE NUMBER: 16/2/1/2/ 91 /14/NUM/01/17
ROBERTSON MEAT ASSURED PROPOSED ABATTOIR/COMPOSTING FACILITY

Good day Mr Fourie

We herewith acknowledge receipt of your email and confirm that you are registered in our database as a D&P for the above mentioned project.

Your email has been sent to the project D&P who will address your comments in the Basic Assessment Report. A copy of the Pre-application Basic Assessment Report will be sent to you for comment as soon as it becomes available for comment.

Kind regards

Nicole Lockberg
Environmental Consultant



See report report number 16/1387/16

Reg: 2016/16/16/01/01

42, Wessels Rd Office: 027 33 23 433 3960

Chermside Fax: 027 33 23 433 3976

South Africa Email: nlock@ecoimpact.co.za

7766 Web: www.ecoimpact.co.za

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From: Le Ross Fourie [<mailto:leross@ecofarm.co.za>]
Sent: 17 March 2017 02:46 PM
To: admin@ecofarm.co.za
Cc: Johan & Mark Fourie
Subject: Proposed Abattoir/Compost Facility on Remainder of Middelburg 10, Robertson

Dear Lauren,

Please register me as an D&P.

Name: Le Ross Fourie
Email: leross@ecofarm.co.za
Cell No: 082 454 9141
Fax No: 027 789 1392
P.O.Box 174, Richards Bay, 3900

I am one of the parties representing Ferkeza (Pty) Ltd which owns various properties directly adjacent, bordering onto, as well as in close proximity to the Remainder of Farm Middelburg 10

- Part of Remainder of Middelburg 10 and various others: Le Ross Fourie Vigneron Wine Cellars & Wine Tasting Room, Function Venue, Vineyards, 2 Directors Houses planned above vineyards, Planned renovation of 2 existing Dams for water storage and tourism.
- Site across the road: To be Game Fenced with permanent Tented Camp next to the River.
- It should be noted that a long term Eco Farm Housing Development Project (60 luxury units in a low-density cluster) have been planned for this farm.
- Other activities include but not limited: Private Skiing on the farm and in Klouf, Mountain Biking, Trail Running, Hiking Trails, Wine Tasting, Hands on Harvesting & Wine making events, Music Hikes, Star Gazing, God with Us Ministries (International Students)
- Portion 3 van 10 Middelburg - Planned Labourers Cottage & B&BBE Development.
- Langkat Farm 52 P12 10 - Le Ross & Fourie Vigneron Wine Shoppe, Coffee Shoppe, Tourism Flag Project, Future Boutique Wine Cellar Wine Shoppe.
- Langkat Farm 52 P12 17.

Your advertisement calls for comment, yet provide no details relating to specific activities, location layout etc, so it's not possible to provide comments at this stage.

Regards
Le Ross Fourie

PRE-APPLICATION BAR



SCIENTIFIC SERVICES

postal Private Bag X5014 Stellenbosch 7509
physical Assogaibosch Nature Reserve Jonkhoutk
website www.capenature.co.za
enquiries Alana Duffell-Canham
telephone +27 21 866 8000 fax +27 21 866 1523
email aduffell-canham@capenature.co.za
reference SSD14/2/6/1/9/1/ 10rem_Feedlot&Compost_Middelburg
date 11 July 2017

Nicole Loebenberg
EcoImpact
PO Box 45070
Claremont
7735

By email: admin@ecoimpact.co.za

Dear Ms Loebenberg

RE: Proposed abattoir compost facility and feedlot on remainder of Farm Middelburg 10, Robertson – Pre-application Basic Assessment Report.

DEA&DP Ref: 16/3/3/6/7/1/B1/14/1347/16

DEA&DP Waste Management Ref: 19/2/5/7/B1/14/WL0013/17

CapeNature would like to thank you for the opportunity to comment on this proposed compost facility and feedlot and wish to make the following comments:

Compost Facility Site:

1. The site was historically covered by Breede Alluvium Renosterveld. Although Breede Alluvium Renosterveld is listed as Vulnerable according to the list of threatened ecosystems published in 2011, a recent analysis by CapeNature's conservation planner, using far more recent groundcover imagery than that used for the 2011 listings, has shown that only 42% of the original extent of this ecosystem is remaining. Thus it now qualifies as Endangered under criterion A1 (remaining extent).
2. A portion of the site has been determined as Critical Biodiversity Area (CBA). Whilst we note that this classification is disputed due to the area being previously disturbed and most of the natural vegetation being removed, the presence of natural vegetation was not the only reason that the western portion of the site was determined as CBA and one of the other reasons includes watercourse protection. Due to the level of disturbance the more correct classification would probably have been CBA 2 which acknowledges that the site is degraded but should be rehabilitated. It is apparent from an examination of current and historical aerial images that drainage lines are present on site and the site has been prone to erosion in the past which indicates that water does flow through the site occasionally. This means that there may be a risk of compost washing off site and into watercourses after a heavy rainfall event. Therefore

The Western Cape Nature Conservation Board trading as CapeNature
Board Members: Mr Maria McOmberg-Hodges (Chairperson), Dr Colin Johnson (Vice Chairperson), Mr Mervyn Burton, Prof Donwar Handicks, Dr Bruce McKenzie, Adv Mandla Mhutu, Mr Danie Nel, Prof Aubrey Reddinghuts, Mr Paul Black

the size of the facility should be reduced to allow larger buffers between it and the watercourses north and west of the site.

3. Although the site purportedly has a high clay content and the risk of infiltration is therefore deemed to be low, we would still like confirmation from a geohydrologist in this regard.
4. Linked to points 2 and 3, input from a geohydrologist should also be obtained regarding the need for mitigation measures (such as berms, cut-off drains, retention pond etc.) to control run-off and infiltration.

Feedlot site:

5. The feedlot site was also historically covered by Breede Alluvium Renosterveld. Although this site has been cleared of natural vegetation, the feedlot does also pose a risk to the nearby watercourse especially if nutrient rich runoff from the site is able to enter the river. A substantial buffer should also be allowed for (>50m) between the edge of the feedlot and the riparian zone. Erosion on site must also be strictly monitored and controlled.
6. For both sites the EMP must stipulate buffers between activities and the watercourses. Although some standard operating procedures have been provided for several activities on site (for example delivery, turning in of animal products, temperature and pH recording etc.) there are no requirements stipulated for monitoring and ensuring contaminants do not leave the site and this requires further consideration.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Alana Duffell-Canham
For: Manager (Scientific Services)



REFERENCE: 19/4/4/1/BL2/ Robertson
EIA REFERENCE 16/3/3/6/1/81/14/1347/16
ENQUIRIES: P. Harmse

ECO IMPACT CONSULTING
P.O. BOX 45070
CLAREMONT
7735

Tel: 021 671 1660
Fax: 021 671 9976
Email: admin@ecoimpact.co.za

Attention: Ms NZ Loebenberg

COMMENT ON THE PRE-APPLICATION BAR FOR THE PROPOSED ROBERTSON ABATTIOR COMPOST FACILITY AND FEEDLOT ON REMAINDER OF FARM MIDDLEBURG 10, ROBERTSON, WESTERN CAPE.

The Pre-Application BAR for the above-mentioned proposed development, dated 15 June 2017, which was received by the Department of Environmental Affairs and Development Planning (DEA&DP), Directorate: Air Quality Management (D: AGM), has reference.

The D: AGM carefully reviewed the above-mentioned application and has the following comments for consideration by the facility:

1. DUST AND NOISE CONTROL REGULATIONS

- 1.1 Dust and noise may be generated during the construction phase of the project.
- 1.2 In this regard, the operation must comply with the following:
 - National Environmental Management: Air Quality Act (NEM: AQA), National Dust Control Regulations [Notice 827 of 2013];
 - Western Cape Noise Control Regulations [P.N. 200/2013].

2. ODOUR EMISSION IMPACT MANAGEMENT

- 2.1 The D: AGM is aware that the composting process generates a certain level of odour, but the Directorate has noted that the facility has received complaints regarding alleged excessive

odour emissions emanating from the composting plant. The facility must investigate best practice measures to minimise or avoid offensive odours.

"In terms of Section 35 (2) of the NEM: AQA (Act No. 39 of 2004), the occupier of the premises must take all reasonable steps to prevent the emission of any offensive odour caused by any activity on such premises."

3 ENVIRONMENTAL MANAGEMENT PROGRAMME (EMP)

3.1 The proposed Standard Operating Procedures (SOP's) mentioned in the Pre- Application BAR should be instituted and maintained in the daily operational production process. The EMP should include, but not be limited to the following considerations related to the abovementioned SOP's

- The composting facility lies 60km away from the Robertson Abattoir, therefore it is important to revise measures to effectively transport abattoir waste to the composting facility as to reduce and or mitigate spillage.
- Blood should be removed from the abattoir every day to reduce the potential for odour release.
- High temperatures may pose a fire risk, therefore the windrows and bulk storage areas should be monitored for temperature spikes.
- Carbon and nitrogen ratios must be at the required level as to abate potential odour release.

Should you have any queries regarding the above comments, please do not hesitate to contact Peter Harmse on telephone number: (021) 483 8343 or email: peter.harmse@westerncape.gov.za

Yours faithfully,


DR. JOY LEANER (PhD)
DIRECTOR: AIR QUALITY MANAGEMENT
DATE: 12.7.2017

Lauren Abrahams

From: Yolande Henstock <yolande@ecoimpact.co.za>
Sent: Tuesday, July 18, 2017 3:18 PM
To: tbrunings@langeberg.gov.za
Cc: Lauren Abrahams; Nicole @ ECO IMPACT
Subject: FW: Proposed abattoir compost facility and feedlot on remainder of Farm Middelburg 10, Robertson - Pre-application Basic Assessment Report.

Good Afternoon,

We hereby acknowledge receipt of your e-mail and the comment attached thereto.

Kind regards

Yolande Henstock
Administration



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From: Tracy Brunings [mailto:tbrunings@langeberg.gov.za]
Sent: 18 July 2017 02:21 PM
To: admin@ecoimpact.co.za
Subject: RE: Proposed abattoir compost facility and feedlot on remainder of Farm Middelburg 10, Robertson - Pre-application Basic Assessment Report.

Good day,

I refer to your letter dated 15 June 2017, and received 11 July 2017.

The following preliminary comments are provided from a land use planning point of view:

The property in question is zoned Agricultural Zone I in terms of the Section 8 Zoning Scheme regulations. The proposed uses, namely: Compost Facility (from abattoir waste) and Feedlot, are not primary uses in the Agricultural Zone I. An application must therefore be lodged in terms of Section 15 of the Langeberg Municipal Land Use Planning Bylaw, 2015. It is noted that the use of the compost facility has already commenced which is in contravention of the Zoning Scheme and a penalty fee is payable.

In terms of the Langeberg Spatial Development Framework, 2015 (SDF) the proposed development site falls within "Core", "Buffer" and "Transformed" Spatial Planning Categories. There is no objection to development within the Transformed and Buffer areas subject to the sustainable management of land use activities. However, development of the compost facility within the identified "Core" SPC adjoining the Middelstroom River is not consistent with the Desired Management Objectives for this land, namely: to maintain natural land, rehabilitate degraded land and maintain ecological processes. This Core SPC forms an integral part of an important north-south environmental link between the Langeberge and the Breede River and connectivity must be maintained. In this regard, natural buffer areas and no-go areas must be identified and complied with to the satisfaction of Cape Nature, SODMA and the CBR WUA. The proposed boundaries of the compost facility must be amended accordingly.

It is noted that there is an existing shed on the site. From google earth, it appears that this shed was built between 2010 and 2014. This office has no records of building plans having been submitted in terms of the National Building Regulations and Building Standards Act No 103 of 1977.

Regards,

Tracy Brunings Pr. Plan A/951/2007
PROFESSIONAL TOWN AND REGIONAL PLANNER
TOWN PLANNING DEPARTMENT



"People at the centre of Development"

3 Piet Retief Street, MONTAGU 6720
Tel: 023 614 8001 Fax: 023 614 1841

✉ tbrunings@langeberg.gov.za www.langeberg.gov.za (Website)

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Lauren Abrahams

From: Yolandie Henstock <yolandie@ecoimpact.co.za>
Sent: Monday, July 10, 2017 2:54 PM
To: lauren@ecoimpact.co.za
Subject: FW: Proposed Robertson Abattoir Compost Facility and Feedlot on remainder of farm Middelburg 10 Robertson ;Pre-Application Bar

Fri

-----Original Message-----

From: Le Roux Fourie [<mailto:leroux@dmvrb.co.za>]
Sent: 10 July 2017 02:52 PM
To: admin@ecoimpact.co.za
Cc: Johan & Marië Fourie <johanrie@barvallei.co.za>; Jacolette Adam <jacolette@exigent.co.za>
Subject: Proposed Robertson Abattoir Compost Facility and Feedlot on remainder of farm Middelburg 10 Robertson ;Pre-Application Bar

Dear Lauren

Can you please inform me when the Public Meeting will be held? As I have numerous questions to ask.

Regards
Le Roux Fourie

Sent from my iPad

Lauren Abrahams

From: Lauren Abrahams <lauren@ecoimpact.co.za>
Sent: Thursday, July 13, 2017 9:47 AM
To: johanrie@barvallei.co.za; jacolette@exigent.co.za
Cc: Nicolaas @ ECO IMPACT
Subject: Proposed Robertson Abattoir Compost Facility and Feedlot on remainder of farm Middelburg 10 Robertson ;Pre-Application Bar

Good morning Mr. Le Roux,

A public meeting has not been scheduled for this project. However we are more than willing to arrange a sit down meeting with you to address your questions.

Kind regards,

Lauren Abrahams



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Lauren Abrahams

From: Yolandie Henstock <yolandie@ecoimpact.co.za>
Sent: Tuesday, July 18, 2017 8:16 AM
To: 'Hanneré Jooste'
Cc: 'Lauren Abrahams'; Nicole @ ECO IMPACT
Subject: FW: PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON REMAINDER OF FARM MIDDELBURG 10, ROBERTSON

Good morning,

We hereby acknowledge receipt of your e-mail and the comment attached thereto.

Kind regards

Yolandie Henstock
Administration



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From: Hanneré Jooste [mailto:hannere@gmail.com]
Sent: 17 July 2017 08:33 PM
To: Lauren Abrahams <lauren@ecoimpact.co.za>; admin@ecoimpact.co.za
Subject: Re: PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON REMAINDER OF FARM MIDDELBURG 10, ROBERTSON

Comment on PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON REMAINDER OF FARM MIDDELBURG 10, ROBERTSON

My property, being Portion 22 of Farm Vinke Rivier Number 8 in the Langeberg Municipality Division of Robertson, Province of the Western Cape, is directly adjacent to the "proposed" compost facility and feedlot in a private nature reserve, where a small Airbnb is my sole source of income. These "proposed" developments are a matter of extreme concern. I use quotation marks because the compost facility is already in use and has been for months. The most salient points of consequence are:

The proposed feedlot where you want to keep 6000+ lambs is DIRECTLY ADJACENT TO A NATURE RESERVE where predators like leopard and caracal roam freely. Not only have you failed to address this potential critical conflict, but you explicitly deny the fact that you are near any nature conservation area.

My very livelihood, being derived from a tourism and hospitality facility inside a nature reserve, is dependent on the pristine nature of the immediate environment and the wild animals contained in and by it. The letter includes Cape Leopard (*Panthera pardus*), Caracal (*Caracal caracal*), large-spotted genet (*Genetta tigrina*) and African bushpig (*Potamochoerus larvatus*).

In fact, Middelburg Farm is sandwiched between two tourism-dependent neighbours, bordered as it is by Buitenstekloof Mountain Cottages on the eastern side and exacerbating the importance of the existing fly-, odour-, noise- and traffic- and aesthetic problems. I am financially dependent on visitors to the reserve being able to do hiking, trail running and birdwatching in situ and on the scenic and natural beauty of the environment remaining intact.

Under item 7. LAND USE CHARACTER OF SURROUNDING AREA on page 15 of the The Pre-application Basic Assessment Report you were supposed to "highlight the current land uses and/or prominent features that occur within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site", yet you crossed out both "Nature conservation area" AND "Tourism & Hospitality facility" among others. THIS NEEDS TO BE RECTIFIED. Your statement that "The development site is surrounded by agricultural activities such as cultivation of crops as well as livestock farming." is therefore erroneous. The development site is, in fact, sandwiched between two hospitality facilities and bordering a Nature Reserve. THIS NEEDS TO BE RECTIFIED.

Your concern for the proximity of the facility to the watercourse (page 24) is noted and we await the outcome of your Water Use Licence application.

Another cause for legitimate concern is the potential influx of contract workers/job seekers to the site (page 37). Besides the filtering foreseen in the report, it causes a safety risk to my person as I live alone.

In attempted mitigation of the noise factor, the report states that "adjacent land uses/owners are a considerable distance from the proposed development site and the noise from construction activities may be negligible" (page 38). This is misleading. Sound carries extremely effectively in the quiet of a nature reserve and will be heard by the guests who come here specifically for the quiet and on whom I depend for an income.

Offensive odours (page 41) emanating from the compost site reach the gate to Doornkloof Private Nature Reserve on a regular basis. I – and, more importantly, my guests – have to stop to unlock and re-lock two gates to enter and leave the reserve (automatic gates are not an option), during which time it is often necessary to hold one's breath for the stench. A large proportion of my guests are cyclists, who are affected by the smell when they use the public road that runs past the compost rows.

As for "the attraction of... wild pigs" mentioned on page 42: Doornkloof is home to a family of bushpigs regularly photographed on our trail cameras. As with the leopard and caracal, please explain your management plan for these.

Lastly, the following paragraph (page 41) needs explanation too:

Effluent in the form of sludge / compost tea resulting from the composting process will be generated. The effluent is expected to drain into the constructed cut-off storm water channels which will be stored in the collection dam. The effluent collected in the dam will then be reused in the composting process by spraying the effluent onto the windrows / mounds. This process is considered as disposal of waste that could have a detrimental effect on the environment, which an authorisation in terms of section 21 of the NWA would be required.

I therefore urge a public meeting to address issues including, but not limited to, the aforementioned concerns.

Ms. Hanneke Jooste
Doornkloof Private Nature Reserve
P.O. Box 209
Robertson
6705

0030040034

On 15 June 2017 at 15:25, Lauren Abrahams <lauren@ecoimpact.co.za> wrote:

**PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON REMAINDER OF FARM MIDDELBURG 10,
ROBERTSON: PRE –APPLICATION BAR**

DEA&DP: 16/3/36/7/1/B1/14/1347/16

DEA&DP: WASTE MANAGEMENT REF NO: 19/2/5/7/B1/14/WL0013/17

Good day Mr. Jooste,

Please be advised that an electronic copy of the PRE-APPLICATION Basic Assessment Report and appendices for review and comment prior to submission of the EIA Application to DEA&DP is available on our website at www.ecoimpact.co.za/public-participation.

Your comment would be appreciated within the regulatory 30 day commenting period or by **18 July 2017**.

Please note that should you require a CD copy to be posted to you, kindly provide us with the receiving address.

I trust the above is in order, please acknowledge receipt.

Kind regards,

Lauren Abrahams

The logo for Eco Impact Consulting (Pty) Ltd, featuring the word "eco" in a green font with a leaf icon, and "impact" in a grey font below it.

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NUY KOMPOS AANLEG

Ms. N.Z. Loebenberg

EIA Administration and Compliance

ECO IMPACT LEGAL CONSULTING (PTY) LTD

P.O. BOX 45070

CLAREMONT

7735

Dear Ms. N.Z. Loebenberg

PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON REMAINDER OF FARM
MIDDELBURG 10, ROBERTSON : PRE-APPLICATION BAR. DEA&DP: 16/3/3/6/7/1/B1/14/1347/16
DEA&DP: WASTE MANAGEMENT REF NO: 19/2/5/7/B1/14/WL0013/17

I refer to the 193 page document, on CD,(which I had printed), which deals with the above matter.

From the start, I want to put it on record that I find it totally unacceptable that, as a neighbour, I had to accidentally read about the application in the media. Meanwhile, other neighbours, further away from the application-site, have been consulted and listed as affected parties. I.O.W. your process started flawed.

I would like to comment on a page-by-page basis.

On page 3 of the Basic Assessment Report of the DEAPP under "SUMMARY OF ALTERNATIVES" it is mentioned that this site is the only site available to SAFAM. This is nonsensical as there are many other properties more suitable for sale for the purpose of a compost facility. I also find it devious that the application is actually dual and that it would be wiser to split the application into 2 separate applications. There are hundreds of abattoirs all over SA, so this problem of waste is not unique.

On page 4 reference is made of a "NO-GO OPTION" and attempts are made to create the perception that the subject property is "underutilized Agricultural land unsuitable for the cultivation of commercial crops." This is very wrong as the property has excellent agriculture potential, and that it only needs water for irrigation. As there are surplus water in the Breede River and water technology. The statement that if the proposed development did not continue, SAFAM might cease operations, is not acceptable and irrelevant to the land. I.o.w., if other abattoirs don't have their own compost-facilities, they would all cease all over S.A.? "A negative impact on the market," = What market?

On page 9, at the question regarding (Processing activities(e.g. manufacturing, storage, distribution), the answer is "NO". This is incorrect. There will definitely be storage of compost. This is the case at all compost plants and there is no reason why this one would be different.

The next question regarding regarding storage facilities, is also answered "NO". This again is wrong. Of course raw materials will be stockpiled as they are not always available every day.

On page 10, at number 2 , reference is made to the size of the property, being 402,19 hectares. Why then does the applicant want to place the plant next to the road?

On page 11, at the bottom, reference is made about the close proximity of the Vinkriver. The proposed plant is dangerously close to this river. We have owned our property for 36 years and over these 4 decades we have seen serious water flooding, which makes the application site totally unacceptable.

On page 12 under "3", there are a few "NO" answers which should be affirmative such as steep slopes, seasonal wet soils, erosion, etc. Furthermore , there is also doubt whether the whole site is high in clay content.

On page 15, under number "7", there are a characters of the surrounding area which has been wrongly deleted such as, "UNTRANSFORMED AREA"; " TOURISM & HOSPITALITY FACILITY" ; "SPORT FACILITIES"; "NATURE CONSERVATION AREA"; "MOUNTAIN,KOPPIE OR RIDGE". It was mischievous and misleading to have omitted these "CHARACTERISTICS".

On page 16, reference is made to "TOURISM OPPORTUNITIES", but the application-area is alive with tourism such as Mountain bikers every weekend cycling past and over the properties adjacent. This terrible odour will have a very negative effect. The increase in the associated traffic on the road, which is already too narrow for 2 trucks to pass each other, will be very dangerous for cyclists.

On page 18, under "10" , regarding "APPLICABLE LEGISLATION", it is stated that the National Health Act, Act 61 of 2003, the Constitution of S.A., 1996 and the National Building Regulations and Building Standards Act 103 of 1977 (NBRBSA) and the relevant regulations are all not applicable. This is totally untrue.

On page 19, it would be appreciated if it could be explained which "GUIDELINES ON PUBLIC PARTICIPATION" were used that was responsible for not informing me as a neighbour, but the neighbour on the other side, further away from the subject property?

On page 20 it was answered "YES" at question 1.(iii). This was obviously not the case as I have pointed out.

On page 21 mention is made of the fact that no public meetings were held. This is a serious flaw.

On page 23 , item 6, it is stated that electricity will be obtained from ESKOM, however the supplier of electricity there is the Municipality itself. Furthermore, the increase in trucks and other vehicles will cause more road maintenance. Under item nr. 9, I have already indicated the incorrectness of the statement that "the soil was determined to be unsuitable for the cultivation of commercial crops."

Under item 10, the only concern mentioned is the watercourse, whereas nothing is mentioned about the natural area, etc.

Under item 11 , it is mentioned that "Odours and flies may become problematic," yet no details are provided to stop this. The noise increase will also be apparently "during the construction phase.", yet further on in the application mention is made of all the extra traffic that will be generated by farmers bring animals to the feedlot, other loads of compost-components and raw material, etcetera. The visual effect mentioned is only the feedlot, yet the compost facility is right next to the main road which is increasing daily with tourist, whether by car, horses, cycles, etc. The disastrous effect of the compost plant adjacent to the Slent Road , between Paarl and Klipheuwel, is a classic example.

Under item 12, the application is very economical with the truth regarding the impact on the surrounding land users impact costs.

Under 13, regarding the positive and negative impacts, the only positive impact of the project will be the waste management solution for the abattoir. Nobody else. The fact that farmers can sell their livestock to the feedlot has nothing to do with the disastrous compost facility. The negative impacts are seriously downplayed by referring to the source of nuisance, impact on natural and cultural resources and aquatic environments as , POTENTIAL IMPACTS !!!

Under item 14 it is stated that the composting facility is the "best practicable environmental option for the land". This is such a flawed statement and is rejected with disdain.

The" benefits to society" referred to under item 14, is only to the abattoir. There are many other buyers for lambs and other livestock.

Under "SECTION E: ALTERNATIVES", on page 26, the wrong statement regarding the potential of the land is again repeated. The 6000-6500 animals in the feedlot will be fed "nutritious feed", which again will generate traffic to the area. These 2 activities, namely the compost facility as well as the feedlot are proposed as the only location available to SAFAM is rejected.

On page 29, mention is made that "SAFAM is in the initial stage of composting production." On inspection of the property it was observed that composting activities was already in production and occurring and there was also signboards indicating as such at the locked gate of the farm. It would also be of importance to know if there are not already abattoir waste being used in the processing. For instance, where are the blood of the abattoir currently being dumped?

The "NO-GO OPTION" referred to on page 30, is overplayed by the concealed threat that the abattoir might close. This is disingenuous, as the gaps in the market will always be filled by other operators.

On page 32 you are already affirming the drainage line feeding into the Vinkriver which is totally too risky. We have owned our property since 1980, i.o.w. 37 years, and we have witnessed various flooding over these decades , making your application site too risky for any such intended composting activities.

On page 33, under 2 (b) it is stated that the activity will not produce emissions into the atmosphere. This is not true , as the both the facilities and the compost facility in particular, will definitely produce stinking emissions, as is the case in all other such facilities.

On the same page , under 3, regarding “ WATER USE”, it is mentioned that only water from a “river, stream, dam ,lake” will be used. It is doubtful whether the facility could run a 100% without the supplementing of borehole/underground water.

On page 37 under the “Cumulative impacts:” , mention is made of the “relatively low impact” on traffic. This is not true as the road traffic has consistently increased over the past few years and the width of the road is also problematic.

On page 38 mention is made of the “little” noise impact of the project. This is also untrue as our property is just over a 1000 meters from the site and we hear vehicles, never mind trucks, further away.

On page 40, the “Mitigation” proposed to rectify the “Cumulative impacts:” re adjacent aquatic habitats, are not enough to avoid a catastrophe in times of flooding and other extreme weather events.

On page 41, the impact of offensive odours are grossly underplayed and understated. To further try to dilute the effect of this stench with that of an ordinary feedlot, is truly under-estimating the intelligence of all the other affected parties. Bring me one of these composting plants that don't stink and stench.

On page 42 the “Health risks” is under-played as there are a lot more animals than wild pigs and flies that will be attracted to this open-air restaurant. No plan developed yet.

On page 48 of 62 in “Appendix 1” it is confirmed what is the biggest complaint and fear of allowing such a composting facility. In the second-last sentence it is stipulated that, “Other materials used will be chicken litter,…” This chicken litter could also include dead chickens and Worcester is surrounded by chicken farms. There is no guarantee that the abattoir in Worcester will not start delivering their dead carcasses, blood, etc. and other abattoir waste to this compost facility, as other municipalities are getting much stricter with abattoirs.

On page 2 of the “SUMMARY OF THE PUBLIC PARTICIPATION PROCESS”, under 5, bullet 2, mention is already made of the large amount of flies present.

As there are more processes that still has to be followed, I send you these comments , which contains some of my serious concerns regarding this compost facility.

Please keep me informed regarding the matter.

I therefore hereby express my objection to this application .

Yours sincerely

P.A. Gerber



18 July 2017

Eco Impact Environmental Health and Safety Legal Consulting
P.O. BOX 45070
Claremont
South Africa
7735

Attention: Ms Lauren Abrahams

By e-mail: lauren@ecoimpact.co.za

Dear Ms Abrahams,

**PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON
REMAINDER OF FARM MIDDELBURG 10, ROBERTSON: PRE-APPLICATION
BASIC ASSESSMENT REPORT**

1. We represent Perisseia (Pty) Ltd, which is an interested and affected party for purposes of the application prepared for South African Farm Assured Meat Group CC in respect of the proposed Robertson Abattoir Compost Facility and Feedlot. We also represent the individual representatives of that company, namely Mr Johan Fourie and Mr Le Roux Fourie (collectively "our clients"). Our clients are all interested and affected parties and their concerns regarding your client's application have previously been communicated to you.
2. On behalf of our clients, we summarise the multiple concerns our clients have regarding the application for environmental authorisation and waste management licence for the proposed Robertson Abattoir Compost Facility and Feedlot and the documents to be submitted in support thereof. Based on the information contained below, we believe it would be prudent for you, as the independent environmental assessment practitioner, to propose that the

application be commenced afresh in order to address the numerous short comings that have been identified.

3. Previous complaints demonstrating likely inability of applicant to effect sound environmental management practices

3.1. As evinced by our clients' previous complaints in this regard, there are frequently unsavoury and nauseating smells present in the area; all emanating from rotten meat that occurs from the current activities conducted on the property. These smells occur during various weather conditions, though they are particularly bad during high temperature periods and arise at various times of the day. The smells are particularly prevalent on the farm which is situated directly adjacent to the site (i.e. on the eastern side of the property and on the cycle route which exists on the Van Loveren Farm located South of this property). Our clients have also experienced the smells whilst out walking early in the mornings approximately 1.2 km away from the property.

3.2. Foul odours have also been reported as follows:

3.2.1. by the Cellar Master, Kobus van der Merwe, at the Cellar at various times of the day. These odours were noted as well by Johan Fourie and German wine buyers when visiting the Cellar;

3.2.2. by Kaysha Bucher from America and Barbarah Horsch from Germany in February 2017 whilst using the Cycle Route on the adjacent Van Loveren Farm; and

3.2.3. by our clients' farm labourers at a distance of approximately 1km from the Buitenstekloof Main Entrance which in turn is approximately 800m from the Existing Facility – their accommodation is affected.

3.3. Clearly, the existing activities conducted on the property on which the proposed activity is to take place are poorly managed. To introduce additional activities would, it is submitted, be environmentally irresponsible and clearly result in infringements of our clients' rights to an environment which is not harmful to their health and wellbeing. It is submitted that in considering the application, the Department must consider the applicant's existing activities, impacts and failures. Clearly the applicant is not conducting its activities in a manner which is demonstrative of sound

environmental management practices. On this basis, our clients vehemently object to any further activities being undertaken by the applicant.

3.4. It is noted in Annexure F (the summary of the public participation process) that a site inspection was conducted by the authorities in response to a complaint with regard to alleged nuisance conditions at the Robertson Abattoir Composting Facility. Evidently irregular odours were not detected though flies were noted. It is submitted that further site inspections must be conducted.

3.5. We also refer to our concerns below regarding the very real possibility that the activities which are the subject of the current application have already unlawfully commenced.

4. Inadequate public participation process

4.1. Though we appreciate that a basic assessment contemplates a lesser form of public participation, it is submitted that a public meeting ought to have been held, particularly given the fact that the impact assessment has been so poorly conducted and it is impossible for an interested and affected party to seek the necessary clarification via alternative means.

4.2. By way of explanation regarding the inadequacy of the impact assessment, we refer to the failure to have conducted and / or identified the need for various specialist reports and further, to insufficient information having been made available to interested and affected parties. In this regard, we note, amongst other things, that:

4.2.1. only a portion of the site will be used for the proposed facility. However, there are no layout plans included in the application;

4.2.2. there is insufficient information regarding the composting activities already being conducted on the property.

5. Failure to conduct adequate impact assessment

5.1. It is clear that the proposed activity will have significant impacts on surrounding properties and the environment. We are concerned that there has been an entirely inadequate assessment of these potential, and we believe likely, significant impacts. No specialist investigations have been

conducted. We believe that, at the very least, the following investigations ought reasonably to have been conducted:

5.1.1. Biodiversity Study:

- 5.1.1.1. Proof must be provided of consultation with Cape Nature, as well as their comments on the proposed project, specifically with regards to the site being surrounded by Critical Biodiversity Areas (as per Appendix D provided in the BAR) and in relation to the fact that the area identified for the compost facility has been identified as a terrestrial CBA. No opinion of a biodiversity and aquatic specialist has been included in the application to confirm the status and potential impacts on these sensitive areas and further, it appears that the fact that the area identified for the compost facility has been identified as a terrestrial CBA has simply been disregarded without adequate justification or expert corroboration.

5.1.2. Health Impact Assessment:

- 5.1.2.1. An activity of this nature has the potential to result in significant health, environmental and general nuisance impacts. Rotting meat, offal, blood, carcasses and the like will be the primary source of the compost and if not properly managed, these can cause various health impacts. There are multiple instances in the documentation provided which indicate that materials other than non-infectious materials may be kept on site. For example, page 54 of 62 paragraph 7 states that "a separate area must be set aside for whole condemned carcasses as these will need to be covered and (remain) undisturbed for up to 3 Months". The abattoir by-products for composting referred to on pages 48 of 62 specifically state that it comprises non-infectious materials only being blood, stomach contents, lairage manure, and inspection trimmings not for human consumption. This is apparently contradictory.

- 5.1.2.2. Despite the fact that the basic assessment report lists health impacts as a likely impact associated with the operational phase of the proposed development, no health impact assessment has been conducted. No assessment on the likely increase in flies (and their knock-on impacts) as a consequence of the activity has been conducted.
- 5.1.2.3. Already, the flies experienced as a consequence of the activities conducted on the property are a health hazard. They cannot be controlled and are already a nuisance. If they cannot be controlled under present circumstances, it is not clear how this will be achieved with a bigger operation being in place.
- 5.1.2.4. On page 41 and 42 under "Offensive Odours" it is stated that this impact can be completely mitigated "1- Yes, can be completely mitigated" and again under health risks stated that it could be completely mitigated "1- Yes, *can be completely mitigated*" yet the attraction of flies and wild pigs has not been considered in any acceptable detail at all. Yet in Section D of the Report (page 24) under Needs and Desirability, it states that "*odours and flies from the Facility may become problematic, however, the Facility will have mitigation measures and procedures in place which intends to reduce the impacts on neighbours and members of the public*". This obviously does not mean completely mitigated. It also flies in the face of what is currently the situation at the site.
- 5.1.2.5. Alkaline Hydrolysis on Page 27: "*Alkaline hydrolysis was initially considered as it could possibly handle and process the infectious (materials which would be) condemned. Due to a lack of local knowledge and experience this method was not seriously investigated.*" It is concerning that this was not properly investigated (and begs the question what else has not been properly investigated) since it is known to our clients that this

process is used with good effect at various Abattoir Facilities in KwaZulu Natal.

5.1.3. Traffic Impact Assessment:

5.1.3.1. The existing dirt road running past the Facility is currently used primarily by passenger vehicles and tourists for cycling purposes, hence the road carries a very limited number of heavy vehicles. It is obvious that this Facility would generate a substantial quantity of heavy vehicles when delivering sheep to the feedlot as well as collecting sheep to take to the slaughter facility as well as daily trucks delivering abattoir waste, wood chips and collecting compost for distribution. The only effective mitigating measure would be to tar the road from the existing tar road up to the entrance of the property containing the new Facility.

5.1.4. Air Quality Study:

5.1.4.1. Composting organic waste is an important component of the waste management process and a strategy to reduce waste to landfill. Microbiological activity is fundamental to the composting process, therefore any handling of composting material is likely to make airborne significant quantities of those micro-organisms (referred to as bio-aerosols). Bio-aerosols is a term commonly used to describe viable and non-viable airborne biological particles, such as fungal spores, bacteria, pollen, and viruses and their fragments and by-products, like bacterial endotoxins, mycotoxins, peptidoglycans, and (1-3)-beta-D glucans, which may affect living organisms infectiously, allergically, toxigenically or pharmacologically. Workers mechanically handling compost on these sites may therefore be at risk of considerable exposure to bio-aerosols depending on their work task, their proximity to the bio-aerosol source and the control measures put in place. In addition, because the work is largely done out of doors, there is the potential for bio-aerosols generated

to disperse some distance from the point source. Consequently, there is concern that people living or working in the vicinity of waste composting sites (sensitive receptors) may also be exposed to these bio-aerosols.

- 5.1.4.2. Carcasses from meat processing operations contain concentrated amounts of animal tissue. Typically, organs, flesh, hides, feathers and bones may be included. Handling and composting these materials demand care and special practices to accommodate their challenging properties and to control odours and flies.

5.1.5. Storm water management study:

- 5.1.5.1. There are only basic comments regarding a cut-off drain and holding dam. It appears that no cognisance was taken of proper designs, structural / civil plans nor any storm water management plan that notes the quantities of water that will be generated during normal operation / flood conditions and what control measures need to be instituted. No design drawings of storm water facilities are included, and the potential impact on the drainage line adjacent to the site has not been considered.

5.1.6. Socio-economic impact assessment:

- 5.1.6.1. The proposed activity is considered incompatible with existing land uses. Moreover, the impact on existing agricultural and tourist related activities have not been adequately assessed, if at all.
- 5.1.6.2. It is our understanding that the proposed activity is likely to generate fungus and spores that will be transported by air and wind onto surrounding crops which include vineyards, pomegranates and other orchards. This will result in these crops being negatively impacted as well as increased costs associated with managing these impacts. Equally, it is likely to have a devastating impact

on existing wine making activities conducted at the wine cellar since this activity is highly susceptible to fungus / yeast spore contamination. There has been no investigation into this impact by the applicant or its environmental assessment practitioner whatsoever.

5.1.7. Specialist water investigations:

- 5.1.7.1. The site is located directly adjacent to a drainage line. Only limited impacts have apparently been identified. It does not appear that there has been an adequate investigation in this regard. Moreover, no buffer zone has been proposed.
- 5.1.7.2. There is nothing which provides comfort that potential impacts on groundwater have been properly considered and / or mitigation measures proposed.

6. Failure to adequately consider alternatives

- 6.1. The Basic Assessment Report does not meet the requirements for consideration of alternatives. In various places in the Report reference is made to the area being earmarked for a feedlot and composting facility and that the site is presently "*underutilised agricultural land unsuitable for the cultivation of commercial crops*" yet commercial crops are produced on almost all the adjacent farms in similar conditions. This statement is obviously untrue and misleading to any reader of the Report.
- 6.2. In the Pre-Application Report, it states on page 13 that the same land where it is claimed that the land is unsuitable for production of crops, "The site was previously ploughed and planted with pastures and used for grazing purposes". Again, in Appendix J the physical and chemical properties of the soil also showed that the land chosen would not be suitable for any kind of farming, as it would be unsuitable for commercial crops to be grown. The facts contradict the last statement, and prove otherwise.

7. Failure to adequately consider mitigation measures / inadequate EMP

- 7.1. It appears that the main focus of the application and EMP is on the construction impacts, however the potential concern of our clients are the operational impacts, more than the construction impacts. These

operational impacts must be considered and assessed as part of this application.

8. Regulatory assessment

- 8.1. We do not believe that an adequate regulatory assessment has been conducted. To this end, we draw your attention to subcategory 10 of the listed activities published in terms of the National Environmental Management: Air Quality Act. That Act (as read with the listed activities published in terms thereof) requires an atmospheric emission licence for any installation which processes (including rendering, cooking, drying, dehydrating, digesting, evaporating, or protein concentrating) more than 1 ton of animal matter per day not intended for human consumption. There is no indication that the application of this listed activity has been considered and if not applicable, why this is the case. Instead, it is noted that atmospheric emission activities are marked as being "not applicable".
- 8.2. The construction of a storm water dam also appears to be contemplated though there is no indication that there has been due consideration of the application of, amongst others, section 21 of the National Water Act.
- 8.3. More concerning is the fact that it appears to us that the existing activities may not be being lawfully conducted. For example, we believe that at least a waste management licence would have been required for the disposal of animal carcasses activities which has already taken place from time to time on the property and in respect of which our clients have previously raised legitimate concerns.
- 8.4. There is no mention of this activity already having been conducted in the documentation provided, save for reference to a site inspection having been conducted by the authorities following receipt of a nuisance complaint. There is also no mention of any existing authorisations or approvals already held by the facility. All existing approvals should have been made available as part of the process. Instead, Annexure F refers to the fact that the site is in the process of applying for a waste management licence. Since the activity has already commenced (potentially unlawfully, since it is not clear whether or not it holds or was required to hold any environmental approvals), the activity which ought properly to have been applied for is an expansion and not the development of a new activity.

- 8.5. It is also our view that if the existing activities have been unlawfully conducted, at least a section 24G rectification application is required in terms of the National Environmental Management Act.
9. As indicated above, we believe that there are potentially a number of authorisations and / or listed activities which ought to have been applied for but for which application has not been made. To the extent that this is correct, we submit that it will be necessary to withdraw this application and to commence the process afresh.
10. Regardless of the above, kindly provide our clients and us with your responses to all concerns raised in this letter. We reserve our clients' rights to respond either to you or directly to the Department, as the case may be.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'A. Reeder', written over a diagonal line that crosses the signature.

CHRISTO REEDERS ATTORNEYS



REFERENCE: 16/3/3/6/7/1/B1/14/1347/16
ENQUIRIES: D. Matthews
DATE OF ISSUE: 2017-07-18

The Board of Director
South African Farm Assured Meat Group cc
P. O. Box 895
ROBERTSON
6705

Attention: Mr D. Houghton

Tel: (023) 626 6320
Fax: (023) 626 6040

Dear Sir

COMMENT ON THE NOTICE OF INTENT DRAFT BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON THE REMAINDER OF FARM MIDDELBERG NO. 10, ROBERTSON

1. The draft Basic Assessment Report dated 12 June 2017, as received by the Department on 15 June 2017, refers.
2. The Department notes that the proposal entails the establishment of a composting facility over an area of approximately 7,5ha, with associated storm water cut-off channels and a collection dam to contain and store storm water generated from the site and a feedlot over an area of approximately 9ha in extent.
3. The Department has the following comments:
 - 3.1 On 7 April 2017 the Minister of Environmental Affairs promulgated amendments to the regulations in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), viz. the Environmental Impact Assessment ("EIA") Regulations 2014 (Government Notice ("GN") No. 326, 327, 325 and 324 in Government Gazette No. 40772 of 7 April 2017). These regulations came into effect on 7 April 2017. Your attention is therefore drawn to the following:
 - 3.1.1 You are therefore requested to consult the new listed notices as contained in GN No. 327, 325 and 324 of 7 April 2017 and to include all activities (similarly and/or newly listed) applicable to the application in the in-process BAR. You will also be required to indicate how the impacts of the additional activities, listed in terms of the NEMA EIA Regulations, 2014 (as amended), have been adequately assessed. In addition to this, all (registered) Interested and Affected Parties must be informed of any new listed activities that may be triggered in terms of the EIA Regulations 2014 (as amended), as well as the potential impacts thereof.
 - 3.2 It is noted from the comments and responses report, that the Cape Winelands District Municipality received a complaint regarding the composting plant. It is our understanding from the aforementioned that a composting facility already exists on site. As such, you are requested to confirm whether a composting facility exist on site

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and whether, if applicable, it would have constituted a listed activity in terms of the NEMA EIA Regulations at the time of commencement with construction activities. Also, should a composting facility exist on site you are requested to provide this Department with details on the size of the facility, the vegetation status at the time before commencement of construction activities, access to the site etc.

- 3.3 From the aerial photographs, attached as Appendix A, it is noted that the site for the proposed composting facility and the feedlot as well as an area north of the watercourse were cleared between 2010 and 2014 (Figures 1 and 2). You are requested to confirm if this is indeed the case. Should it be, you are requested to provide this Department with details of the activity e.g. the vegetation status before the commencement of construction activities and if applicable, with proof that Environmental Authorisation was obtained for the clearance of indigenous vegetation.
- 3.4 According to the aforementioned aerial photographs, the construction of a building and associated infrastructure commenced between 2010 and 2014 adjacent to and within 32m of the watercourse. Proof of obtaining Environmental Authorisation for the building must be provided to the Department. Furthermore, clarity regarding whether the building is directly associated to the proposed development must be provided to the Department.
- 3.5 It is noted that a watercourse is present adjacent to the site where the feedlot will be located. You are requested to confirm how far the feedlot facility/facilities will be located from the watercourse. If within 32m of the water course you will need to revise the listed activities applicable to the proposal. It is further suggested since a watercourse is present adjacent to the site and given that an access road runs through the watercourse that a Maintenance Management Plan ("MMP") form a component of the Environmental Management Programme ("EMPr") and that Activity 19 of GN. No. 327 be included as part of the application. It should be noted that should the Department agree to the proposed MMP, future maintenance work specified within the MMP would not require an Environmental Authorisation prior to the undertaking thereof. Please be advised that the MMP relates to the aforementioned listed activity only.
- 3.6 In line with the information requirements of Appendices 1 and 4 of the EIA Regulations, 2014 (as amended), please ensure the following is included in the BAR submitted to the Department for decision-making once formal application has been made:

For inclusion in the BAR:

- 3.5.1 Original signed declaration (applicant, environmental assessment practitioner and specialist),
- 3.5.2 a plan which locates the proposed activity/ies applied for as well as associated structures and infrastructure at an appropriate scale (i.e. a site development plan),
- 3.5.3 Details of the public participation process undertaken in terms of Regulation 41 of the Regulations, including copies of the supporting documents and inputs, and
- 3.5.4 A summary of the issues raised by Interested and Affected Parties ("I&APs"), and an indication of the manner in which the issues were incorporated, or the reasons for not including them.

For inclusion in the EMPr:

- 3.5.6 The expertise of that EAP to prepare an EMPr, including a curriculum vitae.

- 3.5.7 A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers;
- 3.5.8 The frequency of monitoring the implementation of the impact management actions.
- 3.7 Please note that omission of any required information in terms of Appendices 1 and 4 of GN No. 326 with regards to the final submission to the Department of the BAR and EMPr respectively, may result in the application for Environmental Authorisation being refused.
4. The Department awaits the submission of the Application Form prescribed by Regulation 16 of the EIA Regulations, 2014.
5. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
6. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
7. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.

Yours faithfully
Yours faithfully



**HEAD OF DEPARTMENT
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

CC: (1) Ms L. Abrahams (Eco Impact Legal Consulting (Pty) Ltd)
(2) Ms T. Brunings (Langeberg Municipality)

Fax: (021) 671 1660
Fax: (023) 614 1841

Appendix A



Figure 1: Aerial photograph of the site during 2010.



Figure 2: Aerial photograph depicting cleared areas and building adjacent to the watercourse.

16/3/3/6/7/1/81/14/1347/16

Page 4 of 4



Eco Impact Consulting

Private Bag X9086

Cape Town

8000

Tel: 021 671 1660

Fax: 021 671 9976

Email: admin@ecoimpact.co.za

Dear Nicole

COMMENTS: DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ROBERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT ON REMAINDER FARM MIDDELBURG 10, ROBERTSON:

The Directorate: Pollution and Chemicals Management (D: PCM) hereby acknowledges receipt of the above mentioned application for the proposed Robertson abattoir composting facility and feedlot and has the following comments:

1. Operational Management:

- a. In the event of an accidental spill or leakage of product (e.g. hazardous substances used during both the Construction and Operational Phase), such incidents must be reported to all the relevant authorities including the Directorate: Pollution and Chemicals Management in accordance with Section 30 (10) of the National Environmental Management Act (NEMA), (Act No. 107 of 1997). This pertains to the control of emergency incidents and should include the reporting, containment and cleaning-up procedure of such incident and the remediation of the affected area.

2. Waste Management:

- a. All hazardous waste materials must be stored in a clearly demarcated area and disposed of using professional and licenced waste disposal contractors and waste sites. All documents relating to volumes and type of wastes must be available on demand.

3. Water Management:

- a. The proposed feedlot, due to the intensive nature of operation, has the potential to cause significant surface- and/or groundwater impacts (aquifer contamination) due to animal wastes deposited. These impacts need to be managed and reduced to acceptable levels, hence the applicant must adhere to these recommendations and the following mitigating measures should be considered for inclusion in the environmental management plan (EMP):

- i. Implement corrective actions if any spills are observed:

designated manure storage area where it can be dried, bagged and sold as manure;



- iii. Produce and implement an acceptable storm water management plan.;
- b. A ground water monitoring programme to ensure regular monitoring of ground water quality must form part of the EMP. The results of the monitoring and sampling programme must be available on demand.

4. General

- a. Vector management could result in water contamination due to pesticide usage. Pesticide application near rivers, wetlands and other fresh water resources should be minimised and applicable types of pesticides (non-persistent) should be applied.;
- b. The following procedures will assist in the environmentally safe use of pesticides and chemicals:
 - i. Pesticide containers should be stored in a weather-proof and fire resistant building that is maintained in good condition. Pesticide containers should be stored on an impermeable base;
 - ii. A sump to contain and decant spills during pesticide preparation would be fortuitous;
 - iii. Unused pesticide and contaminated disposable equipment should be disposed of correctly to ensure reduce risk of environmental contamination;
 - iv. Empty pesticide containers should not be burned or buried as it could be a risk to human health and may contaminate soil and groundwater resources.

Please contact Shehaam Brinkhuis at the contact details indicated, should you have any enquiries regarding these comments.

Yours faithfully,


 **Wilna Kloppers (Mrs.)**
Director: Pollution and Chemicals Management

Date: 3 August 2017 .

BREDE-GOURITZ

Catchment Management Agency
Opvanggebied Bestuursagentskap
I-Arhente yoLawulo lomMandla nokungongileyo
51 Baring Street Worcester 6850, Private Bag X3055 Worcester 6850

Enquiries: N. Feni	Tel: 023-3468000	Fax: 023-3472018	E-mail: nfeni@bgoma.co.za
Your Ref: 16/3/3/6/7/81/14/1347/16	Our Ref: 4/10/2/H40L/Middelburg 10 (rem)		Date: 17/08/2017

Eco Impact Legal Consulting (Pty) Ltd
P.O. Box 45070
Claremont
7735

Attention: Nicolaas Hanekom
(admin@ecoimpact.co.za)

PRE – APPLICATION BASIC ASSESSMENT REPORT FOR PROPOSED ROERTSON ABATTOIR COMPOST FACILITY AND FEEDLOT: LOCATED ON REMAINDER OF FARM MIDDELBURG 10, ROBERTSON

Your Basic Assessment Report dated 15 June 2017 with DEA&DP reference number: 16/3/3/6/7/1/B1/14/1347/16 submitted on behalf of South African Farm Assured Meat Group cc by *Eco Impact Legal Consulting (Pty) Ltd* has reference:

The Breede –Gouritz Catchment Management Agency has assessed the documents and has no objection to the proposed activity provided the following conditions are considered prior the implementation of the activity.

Water Supply

- Non-compliance investigation letter issued on the 02 May 2017 to Mr H. Van Bob regards the possible illegal construction of an existing dam must be addressed prior the commencement of the activity. Section 21(a) ,(b) and any other water use attached that are not registered on WARM system must be applied for;
- Should an applicant has an ELU, permit, Enlistment from Water User Association or Licence of the existing dam, the BGCMA request to be provided with that information;
- Details pertaining to the source, availability and quality of the water required for the proposed project must be investigated to ensure that there is enough supply to cater for this proposed development;
- The current water use on the property for agricultural purpose must be amended to Agro-industrial use with this office within 30 days upon obtaining an Environmental Authorization;

- If a dam exceeds 5m high and storage capacity of 50 000, triggers water use authorization in term of Section 21(b) of the National Water Act, 1998 and qualifies for dam safety regulation. The applicant is advised to submit an application to a Dam Safety Officer for a dam to be classified;

Storm water management

- The stormwater management plan for the proposed activity must be developed taking into consideration the anticipated ingress of siltation on the water resource and/or any drainage area within the site. The stormwater management plan should also consider soil erosion impacts and the downstream water users and impacts must be properly identified and mitigated. Measures must be taken to control and mitigate any activity that may detrimentally impact both the surface water resource and downstream water users;
- Clean and dirty stormwater must be separated. Please detail where will the dirty storm water from contaminated area be conveyed to;
- All reasonable measure must be taken to prevent contaminated stormwater overflowing from any storage dam entering water resource;

Waste management

- Details of the volume of waste to be disposed, designs and capacity of the collection dam must be provided. Filler trap or screening should be installed to ensure that the capacity of the dam is not compromised by slurry or sludge;
- All information pertaining to the waste management on site, including the existing sewer infrastructure & any proposed facilities must be detailed and taking into account the personnel that will be expected to be on site, its locality to the water resource, proposed designs, and an agreement must be reached with the service provider for any collections, transportation and disposals of sewer contents that may be anticipated;
- Suspended solids must be removed from collection dam, and the resulting sludge disposed of at the registered Wastewater Treatment Works;
- A Soil Analysis Study and Water Quality Management Impact Report must be conducted to assess risk associated to waste management (e.g. compact facility, vehicle type & capacity and transportation of waste from abattoir to compost facility).
- Please provide details of the compost surface area. For compost facility, a concrete slab or bundled area may be appropriate to prevent soil, surface water or groundwater contamination during wet season. Compost should be stored in a protected area where it will not waste down to water resource. Such facility should be located in a regulated area.
- The Geotechnical assessment must be utilised to give indication about the geology of the proposed development site, and the typical construction material and associated choice of structure(s) (particularly sewer pipelines, barrier berms to divert to water

resource and such) that will be suitable as per the geology of the area of the proposed development;

- Integrated Waste Management Plan must be conducted to explain how waste management (e.g. waste stream, sewage management and storm water) will be managed;
- Should the proposed activity take place within 1:100 or 100 metres from any water resource or within 500 metres of the wetland, known as the regulated area, a water use activity as in accordance with Section (c & i) water uses may be triggered and such an activity must be applied for to this office for an authorisation;
- This will required Freshwater study, that must be prepared by a Fresh water Ecologist;

Please be advised that no activities may commence without the appropriate approvals/authorisations where needed from the responsible authority. The onus remains with the registered property owner to confirm adherence to any relevant legislation that such activities might trigger and/or need authorisation for.

This office reserves the right to amend and revise its comments as well as to request any further information.

Please do not hesitate to contact this office if you have any further queries. Please ensure to quote the above reference in doing so.

Yours faithfully,



PHAKAMANI BUTHELEZI
CHIEF EXECUTIVE OFFICER

From: Louis Jordaan [mailto:Louis@grahambeckenterprises.co.za]
Sent: 14 July 2017 12:52 PM
To: admin@ecoimpact.co.za
Subject: {Disarmed} RE: I &AP registration.

Good day.

I received your pre application basic report and would like to add my concerns regarding the project.
I am next door neighbour living on Doornkloof private Nature reserve.

1. Since the compost facility started I had a huge problem with flies. This is confirmed by other neighbours and previous complaints . I therefore believe that method you used to track how far outside the facility flies where noticeable where poor and unsuccessful.
2. In this area are roaming Cape Leopard. What measures are put in place not to be in conflict with this predator and any other like Rooikat? Surely the abattoir waste and feedlot will have influence in behaviour of these animals which will create conflict.

I would appreciate if you could address these points.

Kind Regards

From: Yolandie Henstock [mailto:yolandie@ecoimpact.co.za]
Sent: 10 April 2017 11:03 AM
To: Louis Jordaan
Cc: 'Lauren Abrahams'; 'Nicole Loebenberg'
Subject: RE: I &AP registration.

DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1 B1 14/1347/16
DEA &DP WASTE MANAGEMENT REFERENCE NUMBER: 19/2/5/7/ B1 /14/WL0013/17
ROBERTSON MEAT ASSURED PROPOSED ABATTOIR COMPOSTING FACILITY

Dear Mr Jordaan,

We herewith acknowledge receipt of your email and confirm that you are registered on our database as a I&AP for the above mentioned project.

Kind Regards,