

## **SUMMARY OF THE PUBLIC PARTICIPATION PROCESS**

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 on 16 May 2018: Die Burger and the Tygerburger

The notice boards were placed on site on 17 May 2018.

The Scoping Report will be sent to the following Departments:

- CapeNature Scientific Services: Letter and Draft Basic Assessment Report on 17 Augustus 2018
- City of Cape Town: Letter and Draft Basic Assessment Report on 17 Augustus 2018.
- DEA&DP Pollution & Chemical Management: Letter and Draft Basic Assessment Report on 17 Augustus 2018.
- DEA&DP Waste Management: Letter and Draft Basic Assessment Report on 17 Augustus 2018.
- Department of Agriculture: Letter and Draft Basic Assessment Report on 17 Augustus 2018.
- Department of Transport & Public Works: Letter and Draft Basic Assessment Report on 17 Augustus 2018.
- Department of Water & Sanitation: Letter and Draft Basic Assessment Report on 17 Augustus 2018
- Heritage Western Cape: Letter and Draft Basic Assessment Report on 17 Augustus 2018.

Five notices were sent via registered mail to the owners and occupiers of land adjacent to the site where the activity is to be 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.

## 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.
2. Photos of the notice boards are included. The notice boards were placed on site.
3. Placing an advertisement in a local newspaper in compliance with the Regulations.  
An advert was placed in the Tygerburger and Die Burger notifying the public of the proposed development and inviting them to register as Interested and Affected Parties within 30 days.
4. Lists of Identified and Registered Interested And Affected Parties
5. 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 Responses Report from registered I&AP's will be included.
6. Workshop with Key Role players  
No workshops have been held to date.

**NOTICE SENT TO NEIGHBOURS AND ERECTED ON SITE****PUBLIC PARTICIPATION PROCESS****PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING FACILITY****PREVIOUS 2015 NOI DEA&DP REFERENCE NR: 16/3/3/6/7/1/A5/37/2318/15  
AND****VARATION OF THE AIR EMISSIONS LICENCE  
AEL REFERENCE NUMBER: WCCT 022  
AMENDMENT OF THE WATER USE LICENSE AND  
APPLICATION FOR A WASTE LICENSE**

Notice is given of the public participation process commenced by Astral Operations Ltd trading as County Fair for the expansion of the existing County Fair Hocraft Abattoir and rendering facility as well as of the variation to the Atmospheric Emission Licence, application for a waste license and amendment to the water use authorization license.

**Location:** Klipheuwel Road, Portion 16 of Farm Jumbo No. 724, Joostenbergvlakte, Kraaifontein

**Listed Activities:**

<b>Government Notice R. 983 Activity No(s):</b>	<b>Describe the relevant Basic Assessment Activity(ies) in writing as per Listing Notice 1 (GN No. R. 983)</b>	<b>Describe the portion of the development as per the project description that relates to the applicable listed activity</b>
19	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;	Upgrade of the existing stormwater dam and system
34	The expansion or changes to existing facilities for any process or activity where such expansion or changes will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution excluding –	Expansion of the rendering facility equipment that results in variation of the AEL and amendment of the Water Use Authorization License

38	The expansion and related operation of facilities for the slaughter of animals where the daily product throughput will be increased by more than- (i) 50 poultry;	Expansion of the abattoir to increase the number of chickens per day
40	The expansion and related operation of facilities for the concentration of poultry, excluding chicks younger than 20 days, where the capacity of the facility will be increased by- 40. (i) more than 1 000 poultry where the facility is situated within an urban area; or (ii) more than 5 000 poultry per facility situated outside an urban area.	Expansion of the abattoir to increase the number of chickens per day
48	The expansion of— (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more; where such expansion occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;	Upgrade of the existing stormwater dam and system
<b>Government Notice 893 in Government Gazette 37054 of 22 November 2013 and amended by:</b> <b>Gen N 551 GG 38863 2015/06/12</b> <b>Activity No(s):</b>		<b>Describe the relevant atmospheric emission activity in writing.</b>
Listed activity no. 10. Animal matter processing. Sterilization of animal matter not intended for human consumption.		
<b>GN No. 921 and amended by <a href="#">GN 1094</a> GG 41175 11/10/2017</b> <b>(See transitional arrangements)</b> <b>Activity No(s):</b>		<b>List of waste management activities that have, or are likely to have, a detrimental effect on the environment</b>
Category A (3) (6) <b>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.</b>		
Category A (3) (7) <b>The treatment of hazardous waste using any form of treatment at a</b>		



facility that has the capacity to process in excess of 500kg but less than 1 ton per day excluding the treatment of effluent, wastewater or sewage.
Category A (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).
Category B (4) (4) The treatment of hazardous waste in excess of 1 ton per day calculated as a monthly average; using any form of treatment excluding the treatment of effluent, wastewater or sewage.
Category B (4) (6) The treatment of general waste in excess of 100 tons per day calculated as a monthly average, using any form of treatment.
Category B (4) (10) The construction of a facility for a waste management activity listed in Category B of this Schedule (not in isolation to associated waste management activity).

**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.

*The landowners of neighbouring properties (as notified) must please ensure that all persons residing on their land are informed of the application.*

**Contact: Nicolaas Hanekom**  
**PO Box 45070, Claremont, 7735**  
**Tel: 021 671 1660**  
**Email: admin@ecoimpact.co.za**

**Date: 17 MAY 2018**

## NOTICE PUBLISHED IN NEWSPAPER

### PUBLIC PARTICIPATION PROCESS

**PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING FACILITY PREVIOUS 2015 NOI REF NR: 16/3/3/6/7/1/A5/37/2318/15 AND VARIATION OF THE ATMOSPHERIC EMISSIONS LICENCE**

**AEL REFERENCE NUMBER: WCCT 022**

**AMENDMENT OF THE WATER USE LICENSE AND**

**APPLICATION FOR A WASTE LICENSE**

Notice is given of the public participation process commenced by Astral Operations Ltd trading as County Fair for the expansion of the existing County Fair Hocraft abattoir and rendering facility as well as variation of the Atmospheric Emission Licence, application for a waste license and amendment to the water use authorization license.

**Location:** Klipheuwel Road, Portion 16 of Farm Jumbo No. 724, Joostenbergvlakte, Kraaifontein

**Listed Activities:** GNR 983 Listing Notice 1 - Listed Activities 19, 34, 38, 40 & 48. GN No. 893 amended by: Gen N 551 GG 38863 Activity No: 10. GN No.921 and amended by GN 1094 Activity: Category A (3) 6, 7 and 12 and B (4) 4,6 & 10.

**Exemption:** No application for any exemption is sought.

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Email: [admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)



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WP Media's publisher Marita Meyer, Nielen de Klerk and Justin Langeveldt, general manager for the South Division.  
PHOTOS: THABANG KUAHO

## TygerBurger wins big at All Star Awards

THABANG KUAHO  
@thab\_journo

It was a night of festivity as WP Media celebrated its star employees on Friday 4 May.

The company, which publishes your favourite community newspaper, *TygerBurger*, hosted journalists, sales representatives and graphic designers during the annual All Star Awards held at the Park Inn Foreshore Hotel.

Two *TygerBurger* journalists, Nielen de Klerk and Stehan Schoeman, were among the winners for the excellent work they have done during the year.

Schoeman walked away with a Living the Values of Media24 award, while De Klerk was the biggest winner of the night.

She took home *TygerBurger* Journalist of the Year and WP Media Journalist of the Year awards.

Both winners were surprised at their wins, but grateful for the recognition.

A shocked Schoeman said he felt honoured. "I am really grateful and honoured. I have worked at *TygerBurger* since September 2006 and through the years I have met so many wonderful people, both in the office and the public, whom I have written about for the sports pages," he said.

"I want to thank Michelle Linnert, Marita Meyer and Justin Langveldt for their continued support and blessing with the award."

De Klerk said the achievement was extra special because she loves her job and working with communities at grassroots level.

"I really hope to help my community by doing my job well, without fear or favour," she said.

"As we work with so many different issues in an area, be it crime or council meetings, WP Media has given me the opportunity to find out what stories I like."

*TygerBurger* editor, Michelle Linnert, said De Klerk's many wins at the company's monthly awards ceremonies prove she is dogged about doing things the right way.

"She is no stranger to danger or demanding divas. We all like the exquisite bubble she lives in, because that is what makes her such an excellent, all-rounder journalist."

"The Living the Values of Media24 award is one that encompasses all those qualities so deeply treasured by Media24 that they pasted it on all their doors and walls and hallways. Stehan is a gentleman at all times."

"His upbringing and that which makes him the ideal recipient of an award that reflects honour, respect and integrity, can never be questioned," she said.



WP Media's publisher Marita Meyer, Stehan Schoeman and Justin Langeveldt, general manager for the South Division.

#### PUBLIC PARTICIPATION PROCESS

PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING FACILITY PREVIOUS 2015 NOI REF NR: 16/3/3/6/7/1/AS/37/2318/15 AND VARIATION OF THE ATMOSPHERIC EMISSIONS LICENCE

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eco impact  
Environmental Health & Safety Legal Consulting



## OPVOEDING



## CBC St John's

The Senior School invites qualified applicants to apply for the following post starting 16th July 2018

### 1. Afrikaans (FAL) and Life Orientation (Grades 8 - 12)

A formal counselling qualification will be to the advantage of the prospective applicant.

A commitment to the caring ethos of a Catholic school and the ability to coach a sporting code as well as manage a cultural activity is essential.

Suitably qualified teachers should forward a CV (Maximum 3 pages) to:

Head of College  
CBC St John's

E-mail: [svanvuren@cbcstjohns.co.za](mailto:svanvuren@cbcstjohns.co.za)

Closing date for applications: 25 May 2018

The Board of Governors reserves the right not to proceed with the filling of this post. An application will not in itself entitle the applicant to an interview or appointment, and failure to meet the minimum requirements of the advertised post will result in applicants automatically disqualifying themselves from consideration. No faxed applications accepted. Candidates not contacted shall consider their application unsuccessful.



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Is u besigheid geleë in Goodwood, Montagu Gardens, Milnerton, Table View, Melkbosstrand, Mattland, Pinelands, Weskus of in die Swartland area?

Kontak my gerus vir advertensie opsies in Die Burger.

Melanie Els

[mels@dieburger.com](mailto:mels@dieburger.com)  
T: 021 910 6536 | S: 083 400 2352

## EOH

Coastal & Environmental Services

### OMGEWINGSMAGTIGING AANSOEK VIR DIE MINERAAL PROSPEKTEER PROGRAM OP VERSKEIE GEDEELTES GROND, LANDROSDISTRIK NAMAKWALAND, NOORD-KAAP PROVINSIE - DMH VERWYSING: NCS30 / 5/11/2 / (11963) EM

Kennis word hiermee gegee aan geaffekteerde grondeienaars, aangrensende eienaars en ander moontlike belanghebbende en geaffekteerde partye, dat die Basiese Assesserings Verslag en Omgewingsbestuur Program Verslag vir die bogenoemde prospekteringsaansoek nou beskikbaar is vir publieke kommentaar. 'n Kopie van die verslag is beskikbaar by die Groenriviermond Akkomodasie, of die konsultant kan gekontak word vir elektroniese kopleë. Die kommentaar periode sal wees vanaf 11 Mei tot 12 Junie 2018. Indien jy graag jou mening wil lig of uitspraak oor hierdie voorgestelde ontwikkeling, wil registreer as n B&GP of meer inligting wil verkry, stuur ons asseblief U geskrewe kommentaar. Stuur asseblief U naam, kontak besonderhede (posadres, telefoonnommer, e-pos adres, posadres) en geskrewe kommentaar aan: Kim Brent, 13 Stanley Straat, Richmond Hill, Port Elizabeth, 6001, Tel: 041-585 1715, Faks: 086-604 8781, E-pos: [kim.brent@eoh.co.za](mailto:kim.brent@eoh.co.za).

### PUBLIC PARTICIPATION PROCESS RENEWAL OF AEL FOR SALDANHA SFF ASSOCIATION WCDEM AEL REF No: 12/3/11(WC/NC/004)

Application: Renewal of Saldanha Strategic Fuel Fund (SFF) Association Atmospheric Emission Licence (AEL) issued by West Coast District Municipality in terms of Section 47 of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004)

Applicant: Saldanha Strategic Fuel Fund Association

Location: The facility is situated approximately 2.3km south of Saldanha Steel east of the Saldanha to Langebaan road.

Listed Activities: This Renewal Application relates to the following Listed Activities as published in terms of Section 21 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). Storage and handling of petroleum products (subcategory 2.2 of list of activities contemplated in Section 21(1)(a) of NEM:QAQ)

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 reference number, 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.



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## Hofrol

#### HOF 16 BEVELE NISI

C V Lubbe vs Pivotal Truck Centre (Pty) Ltd – Liquidation; J A vs C A Daniel – Parental Rights

#### VERSTEKVONNISSE

Absa Bank Ltd vs M C Leibbrandt Restoration Cape (Pty) Ltd & 2 others – Bond; C Z Mfokofi vs South African Transport & Allied Workers Union – Monies Owning; The Standard Bank of South Africa Ltd vs S Kelly – Monies Owning; The Standard Bank of South Africa Ltd vs S S Mgando – Agreement; The Standard Bank of South Africa Ltd vs L M Lekhula – Agreement; The Standard Bank of South Africa Ltd vs B Venter – Agreement

#### SUMMIERE VONNISSE

Absa Bank Ltd vs J L Theron N.O.

& 1 other – Bond; CPH Development (Pty) Ltd vs Precious Real Estate (Pty) Ltd – Monies Owning; Genfin Trading (Pty) Ltd vs D David – Agreement; Sitali Property Sales (Pty) Ltd vs D L F Hunt N.O. & 2 others – Monies Owning

#### AANSOEKE

Charlie Taljaard – Voluntary Surrender; N M Shirliff vs I T Hirschson – Sequestration; K2017006243 (South Africa) (Pty) Ltd t/a Viva Stellenbosch – Voluntary Liquidation; J E van der Riet – Curator ad Litem; J E van der Riet – Curator ad Litem; J Sylvester – Curator ad Litem; S M du Toit – Curator Bonis; I B Saunders – Curator Bonis; G Boois & 2 others vs Swartland Municipality & 4 others – Review/Setting Aside; Traffic Management Technologies (Pty) Ltd vs Rand West City Local Municipality & 1 other – Review; V Sotshant-

sha vs The Road Accident Fund – Interim Payment; T G S Diemo vs The Road Accident Fund – Interim Payment; F A R van der Merwe & 2 others vs Absa Bank Ltd – Agreement; H Droomer N.O. & 1 other vs P Foster & 2 others – Eviction; M Sukalman vs J M Liedeman N.O. – Eviction; S G Basson N.O. vs N M Somdya & 3 others – Eviction; P R Padachy & 1 other vs L A Ricketts & 2 others – Eviction; S Fredericks & 1 other vs C Jacobs & 3 others – Eviction; W S Rothenburg & 1 other – Variation of Matrimonial Property; Naumann Construction vs Move On Up 245 (Pty) Ltd – Order of Court; A A vs M W Warley – Variation; S D Pereira-Carstens vs P G Carstens & 1 other – Parental Rights; S Corbett & 1 other vs E Du Plessis – Parental Rights; F Sabor – Condonation/Joinder; D S A Burrow vs J S Hewett & 1 other – Discovery; N R vs J M Sullivan –

Discovery; A vs V Schleicher – Discovery; T De V vs C Nel – Discovery; Masiza Capital (Pty) Ltd & 2 others vs B A Morrow N.O. & 3 others – Interdict

#### EGSKEDINGS

D V vs B B Beukes; A E vs R F Jones; S R Kensley vs T D Hildebrandt; Kensley; L A vs E Robson; I Rothmann vs A Jawhar; D vs M K Steyn; M vs K Turner; S vs L Witten; K vs M E Welstra; J G vs M Malar; C vs J Smith

#### SIVIELE VERHORE

Miller Bosman le Roux vs Lampac CC Services Rendered t/a Packaging World; Morriton Dean Boole vs Minister of Police – Damages; The Standard Bank of South Africa Ltd vs Elton Raymond Baron – Monies Owning; Laura Celani vs Frederick Raymond Martin – Divorce; Ivor Jowell N.O. & 1 other vs Pauline Jayne Bliton & 6 others

– Will & Testament; Jacobus Reiter Grobbelaar vs The Director of Public Prosecutions – Agreement; Granly Property Ltd & 1 other vs Seena M. Investments & 8 others – Declaratory Order; Sybrand Smit vs Morne Southon; Herman Bester N.O. & 2 others vs Chantal Hoepfner – Monies Owning; Bradley James Elliot vs Collette van Zyl & 2 others – Parental Rights; Werner van Rooyen N.O. & 2 others vs All Occupiers of the Property Known as 29 Pluto Street, Goodwood – Eviction; Andrea Marchetti vs Danica Marchetti & 2 others – To Compel; Vincent Conrad Clarisse vs Melanie Clarisse – Parental Rights; Nicola Barnard vs Flambago 43 CC – Liquidation; Bizhub Print Solutions (Pty) Ltd vs Beyers Realty Group (Pty) Ltd – Return of Goods; Daimler AG & 1 other vs Atlantis Foundries (Pty) Ltd – Interdict; Investec Bank Ltd vs

Mahvungu D Ramarunzi & 1 other – Monies Owning; Jean-Pierre Rautenbach vs The Trustees for the Time Being of the Zinfandel Body Corporate – Damages

#### STRAFSAKE

S vs T Phillips; S vs T A Mathabela & 14 others; S vs X Lantui; S vs M Saunders; S vs L Jacobs; S vs R Galant & 2 others; S vs O Nkololo; S vs J Joseph & 1 other; S vs M Kapa & 6 others; S vs L H D Simbarashe & 4 others; S vs L H D Simbarashe; S vs M Y Robyn; S vs P Mtaia

#### RONDGAANDE HOF, KNYNSA

S vs M Zumana

#### RONDGAANDE HOF, VREDENDAL

S vs M K Visser

#### RONDGAANDE HOF, WORCES-TER

S vs M Posholi



## PHOTOGRAPHS OF NOTICES ERECTED ON SITE





**PROOF OF POSTAGE/DELIVERY**

**MAILING LIST: NOTICE TO NEIGHBOURS – COUNTY FAIR HOCRAFT EXPANSION**

Erf RE/2 – Garden Cities  
PO Box 166  
Edgemead  
7404

REGISTERED LETTER  
(with a domestic insurance option)  
ShareCode: RC2832409652A  
CUSTOMER COPY 301028R

Farm 21/724  
Dan King  
P.O. Box 159  
Kraaifontein  
7570

REGISTERED LETTER  
(with a domestic insurance option)  
ShareCode: RC2832409617A  
CUSTOMER COPY 301028R

Farm 17/724 - Owner  
Louw & Coetzee Attorneys  
PO Box 146  
Durbanville  
7550

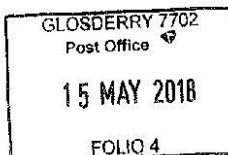
REGISTERED LETTER  
(with a domestic insurance option)  
ShareCode: RC2832409487A  
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Farm 17/724 – B van Zyl  
PO Box 553  
Kraaifontein  
7570

REGISTERED LETTER  
(with a domestic insurance option)  
ShareCode: RC2832409252A  
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Farm 5/1515 – The Owner  
P.O. Box 1479  
Brackenveld  
7560

REGISTERED LETTER  
(with a domestic insurance option)  
ShareCode: RC2832409347A  
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Eco Impact  
P.O. Box 45070  
CLAREMONT  
7735

**TABLE 1: LIST OF IDENTIFIED KEY DEPARTMENTS AND POTENTIAL IAPs**

STAKEHOLDER	CONTACT	TELEPHONE	FAX	EMAIL
CapeNature Private Bag X5014 Stellenbosch 7600	Alana Duffel-Canham	021 866 8000	086 529 4992	<a href="mailto:Aduffell-canham@capenature.co.za">Aduffell-canham@capenature.co.za</a>
City of Cape Town: Environmental Resource Management Department Brighton Road Kraaifontein 7570	Mrs Lesley Wolfensberger-Betts	021 980 6018	021 980 6179	<a href="mailto:Lesley.WolfensbergerBetts@capetown.gov.za">Lesley.WolfensbergerBetts@capetown.gov.za</a>
DEA&DP Pollution & Chemical Management Private Bag X9086 Cape Town 8000	Ms Wilna Kloppers	021 483 2752	021 483 3254	<a href="mailto:Wilna.kloppers@westerncape.gov.za">Wilna.kloppers@westerncape.gov.za</a>
DEA&DP Waste Management Private Bag X9086 Cape Town 8000	Mr Eddie Hanekom	021 483 2728	021 483 4425	<a href="mailto:ehanekom@westerncape.gov.za">ehanekom@westerncape.gov.za</a>
Department of Agriculture Private Bag X1 Elsenburg 7606	Brandon Layman	021 808 5093	021 808 5092	<a href="mailto:brandonl@elsenburg.com">brandonl@elsenburg.com</a>
Department of Health PO Box 6489 Roggerbaai 8012	Mr Stanley Nomdo	021 421 1124	021 418 5685	<a href="mailto:snomdo@pgwc.gov.za">snomdo@pgwc.gov.za</a>
Department of Water & Sanitation Private Bag X16 Sanlamhof 7532	Mr Warren Dreyer	021 941 6189	086 585 6935	<a href="mailto:dreyerw@dwa.gov.za">dreyerw@dwa.gov.za</a>



Heritage Western Cape Private Bag X9067 Cape Town 8000	Mr Calvin van Wijk	021 483 9842	021 183 9842	<a href="mailto:Calvin.vanwijk@westerncape.gov.za">Calvin.vanwijk@westerncape.gov.za</a>
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## **OWNERS / OCCUPIERS OF LAND ADJACENT TO THE DEVELOPMENT SITE**

Erf RE/2 – Garden Cities  
PO Box 166  
Edgemead  
7404

Farm 21/724  
Dan King  
P.O. Box 159  
Kraaifontein  
7570

Farm 17/724 - Owner  
Louw & Coetzee Attorneys  
PO Box 146  
Durbanville  
7550

Farm 17/724 – Lessee  
B Van Zyl  
PO Box 553  
Kraaifontein  
7570

Farm 5/1515 – The Owner  
P.O. Box 1479  
Brackenveld  
7560

**TABLE 2: LIST OF IDENTIFIED KEY DEPARTMENTS AND REGISTERED I&APs**

STAKEHOLDER	CONTACT	TELEPHONE	FAX	EMAIL
CapeNature Private Bag X5014 Stellenbosch 7600	Alana Duffel-Canham	021 866 8000	086 529 4992	Aduffell-canham@capenature.co.za
City of Cape Town: Environmental Resource Management Department Brighton Road Kraaifontein 7570	Mrs Lesley Wolfensberger- Betts	021 980 6018	021 980 6179	Lesley.WolfensbergerBetts@capetown.gov.za
DEA&DP Pollution Chemical Management Private Bag X9086 Cape Town 8000	Ms Wilna Kloppers	021 483 2752	021 483 3254	Wilna.kloppers@westerncape.gov.za
DEA&DP Air Quality Management Private Bag X9086 Cape Town 8000	Dr Joy Leaner	021 483 2888	021 483 3254	<a href="mailto:Joy.leaner@westerncape.gov.za">Joy.leaner@westerncape.gov.za</a>
DEA&DP Waste Management Private Bag X9086 Cape Town 8000	Mr Eddie Hanekom	021 483 2728	021 483 4425	<a href="mailto:ehanekom@westerncape.gov.za">ehanekom@westerncape.gov.za</a>
Department of Agriculture Private Bag X1 Elsenburg 7606	Brandon Layman	021 808 5093	021 808 5092	<a href="mailto:brandonl@elsenburg.com">brandonl@elsenburg.com</a>
Department of Health PO Box 6489 Roggerbaai	Mr Stanley Nomdo	021 421 1124	021 418 5685	<a href="mailto:snomdo@pgwc.gov.za">snomdo@pgwc.gov.za</a>

8012				
Department of Water & Sanitation Private Bag X16 Sanlamhof 7532	Mr Warren Dreyer	021 941 6189	086 585 6935	<a href="mailto:dreyerw@dwa.gov.za">dreyerw@dwa.gov.za</a>
Heritage Western Cape Private Bag X9067 Cape Town 8000	Mr Calvin van Wijk	021 483 9842	021 183 9842	<a href="mailto:Calvin.vanwijk@westerncape.gov.za">Calvin.vanwijk@westerncape.gov.za</a>

#### REGISTERED INTERESTED AND AFFECTED PARTIES

STAKEHOLDER	TELEPHONE	TELEFAX	EMAIL
Garden Cities Chief Executive Officer PO Box 166 Edgemead 7407	021 558 7181	021 558 7172	<a href="mailto:info@gcinc.co.za">info@gcinc.co.za</a>

**TABLE 3: COMMENTS AND RESPONSE REPORT – PRE-APPLICATION DRAFT BAR 2015**

STAKEHOLDER	DATE	COMMENT	EAP RESPONSE
City of Cape Town: Environmental Resources Management Department Lesley Wolfensberger-Betts Pat Titmuss Danette de Klerk Jaco De Bruyn Gawie Smith/Jackie Hintenaus Johann Terblanche Bethwell Mbete	11/11/2015	<p><b><u>Environmental and Heritage Management Branch</u></b></p> <p>It is unclear why the effluent management treatment facility is not being upgraded as part of the process. If the facility is being expanded to allow for an increase in slaughtering of chickens, surely there will be an increase in effluent which will need to be accommodated on site. The applicant is reminded of effluent capacity issues that were experienced in 2006/2007 as well as 2013 where raw untreated abattoir sludge was being discharged directly into the Mosselbank River due to operational failures experienced with the effluent treatment facility. Without a proper motivation as to why the effluent facility will not be upgraded it is logical to assume that the failure of this facility will be more frequent thereby increasing the impact the facility may have on the receiving environment.</p> <p>Section B(4) has been completed erroneously. The author fails to mention the Mosselbank River and associated wetlands on the property, a few hundred metres south west of the facility. This is important in that any effluent overflows will directly impact on this river.</p> <p>Similarly, Section B7 (a) highlights the occurrence of a nearby river however does not give the detail pertaining to the proximity of the river to the existing and proposed facility. The river is</p>	<p>Noted. Please refer to amendments to the application and reports that details the expansions and amendments to both the sewerage treatment plant and effluent generated from the abattoir and rendering facility.</p> <p>Noted. Please refer to amended BAR which include the details of the Mosselbank River as well as location of wetlands, their ecological status and assessed impacts.</p> <p>Noted. Refer to responses above.</p>

		<p>close that both the Greenville, Fisantekraal, Kraaifontein, Uitzicht and Joostenbergvlakte areas but is not mentioned in the detailed description in 7(b) of the Draft BAR.</p> <p>Section F (2) does not address how the 5500cumbic meters of waste water will be disposed of. As the section details waste emissions this should be detailed here. In the 2013 the surrounding grounds of the County Fair farm were being irrigated with this water. Over irrigation lead to the ground becoming saturated and waste water was allowed to run directly into the Mosselbank river. This is problematic as this leads to nitrification of the water and pollution of the river.</p> <p>This Branch is of the opinion that not all the operational impacts of the proposed facility has been addressed in this report. In terms of the increase in the production of waste water the impact of this has not been assessed as it is not clearly stated in the report how this waste will be used/disposed of. Using this water for irrigation purposes will have a direct impact on the biological environment which has been highlighted in point 1.4 above. This must be further addressed in the final BAR.</p> <p>The quarterly monitoring of the water quality of the Mosselbank River at the point of entrance and exit of the site should be written in as a recommendation to ensure water quality is not</p>	<p>Noted. Refer to amended BAR reports.</p> <p>Noted. Refer to amended BAR reports.</p> <p>Noted. The water quality and river health is currently monitored in terms of the water use licensed issued for the existing facility and this will continue. Please refer to amendment to the</p>
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		<p>affected by the irrigation of surrounding land with waste water effluent.</p> <p>ECO monitoring reports must also be sent to this Branch. Please ensure that Section 4.2 of the EMP as included in Appendix H of the draft BAR must be amended to include the City of Cape Town Environmental and Heritage Management Branch.</p> <p>It is questioned whether the Operational Environmental Management Plan (OEMP) included in the draft BAR is the currently approved OEMP being used on site. It is advised that the current OEMP for this site be updated where necessary and submitted as part of the final BAR for comment.</p> <p>Section B (6) indicates that the land use of the site is partly light industrial. As per the comment from Land use Management (point 2 below) this does not appear to be the case. This must be corrected</p> <p><b><u>Land Use Management</u></b></p> <p>An approval was granted in 2008 for the rezoning of a 12.1h portion of Portion 16 of Farm 724 from Agriculture Zone 1 in terms of the (then) Section 8 Zoning Scheme in terms of LUPO, to Agriculture Zone 2, to regularise the pre-existing uses on the site (including abattoir) and to allow for extension to and intensification of the uses. Building line departures were also granted a the</p>	<p>Water Use License application and detail in the amended reports.</p> <p>Noted. Refer to amended EMP.</p> <p>Noted. Refer to amended EMP.</p> <p>Noted. Refer to amended report.</p> <p>Noted.</p>
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		<p>same time to accommodate the existing buildings with building lines being relaxed from 30m to 10m.</p> <p>With the change to the City's integrated Cape Town Zoning Scheme, an Agriculture Zone zoning was assigned to this property. The existing uses on the portion for which the above mentioned approval was granted, therefore became lawful non-confirming uses.</p> <p>As the approval was granted for the entire 12.1ha portion of the site, without any conditions limiting the scale and extent of the activities, it is considered that the lawful non-confirming use (including abattoir and associated rendering activities) applies to the entire portion of the site.</p> <p>The proposed new building extensions encroach into the 30m building lines, and as such, an application for a permanent departure is required.</p> <p><b><u>Utility Services</u></b></p> <p>No service report has been included with the application it is unclear whether any additional water demands and sewage discharge will be applicable. This can only be determined once the necessary info has been provided.</p>	<p>Noted.</p> <p>Correct.</p> <p>Noted. Application for permanent departure will be submitted together with the building plan approvals once authorization is given and the extent of the expansions is known and authorized.</p> <p>Please refer to water demand and audit detail that record water usage, the current supply and needs and infrastructure installed to reduce water consumption. The effluent treatment is done on site and the details of amendments to infrastructure included in the application reports. ESKOM provide electricity and the current supply is sufficient to handle the</p>
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		<p>electricity demands as per the intended upgrade. The expansions to the abattoir and infrastructure will result in upgraded equipment being installed which uses less electricity.</p> <p>The industrial process will need to be evaluated by the Water Pollution control section but this will probably only be at the building plan stage.</p> <p><b><u>Environmental Health</u></b></p> <p>The applicant must comply with the City of Cape Town Environmental health By-Law (no 13333 of June 2003, Part 1 – Prevention and Suppression of Health Nuisances).</p> <p>Building plans must be submitted for new buildings and for any alterations to the existing buildings.</p> <p>Facilities must be provided for persons with disabilities in accordance with SANS10400-S: 2001 Edition 3. This includes ramps/walkways, toilets facilities and removal of obstructions in the path of travel of disabled persons.</p> <p>Adequate toilet facilities must be provided in accordance with SANS 0400 of 1990 (Table 6).</p> <p>The premises must comply with the WC Noise Control Regulations P.N. 200/2013 not creating a disturbing noise or noise nuisance to surrounding property owners.</p>	<p>Noted.</p> <p>Noted. Please refer to amended BAR and EMP.</p> <p>Noted.</p> <p>Noted. Included in building plan designs.</p> <p>Noted. Included in building plan designs.</p> <p>Noted. Please refer to amended BAR and EMP.</p>
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		<p>The premises must comply with the Tobacco Product Control Action (Act 83 of 1993) as amended.</p> <p>The premises must be made rodent proofed in accordance with the Government Rodent Proofing Regulations.</p> <p>All sewage &amp; waste waters must be handled and treated and disposed of in such a manner that it causes no health nuisance/hazard to anyone who may be working on the premises abutting neighbours, any visitors to the premises and the environment.</p> <p>The water quality of the final waste water must comply with the standards as set out in the National Water Act (Act 36 of 1998)</p> <p>Monitoring and management measures must be put in place to control and prevent the breeding of flies, insects and odours that may originate from these activities.</p> <p>Effective dust control measures must be put in place.</p> <p><b><u>Transport for Cape Town: Storm water and sustainability</u></b></p> <p>The proposed new infrastructure and extensions will all take place next to the existing abattoir and rendering facility on the area that is zoned Agri-Industria. These new additions (facilities</p>	<p>Noted. Please refer to amended BAR and EMP.</p> <p>Noted. Part of current and future pest control on site.</p> <p>Noted. Refer to application documents for more details.</p> <p>Noted. Refer to application documents for more details.</p> <p>Noted. Part of current and future pest control on site.</p> <p>Noted. Refer to EMP.</p> <p>Correct.</p>
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		<p>and infrastructure) will create increased and concentrated storm water runoff.</p> <p>The P-DBAR, Section B, Applicable legislation, policies and/or guidelines, page 17 must be amended by adding the following to the listing:</p> <ul style="list-style-type: none"> <li>• Management of Urban Stormwater Impacts Policy, Approved by Council: 27 May 2009;</li> <li>• Floodplain and River Corridor Management Policy, Approved by Council: 27 May 2009;</li> <li>• By-Law Relating to Storm Water Management, Approved by Council: 30 August 2005</li> </ul> <p>In 2006/2007 as well as in 2013 County Fair (CF) dumped raw untreated abattoir sludge directly in the Mosselbank River due to operational failures within County Fairs Hocraft abattoir and rendering facility. In both cases CF neglected to act immediately and waited upon the City of Cape Town to engage with them before actions were initiated to appoint an environmental consultant to do the necessary damaged control and Mosselbank River rehabilitation. This is proof that there are no / limited contingency measures in place to prevent or resolve an untreated abattoir sludge spillage incident timeously. Revised Operational Environmental Management Programme (OEMP) for this site must be compiled. This OEMP must include inputs from CoCT and DWS. It must address storm water management issues, untreated effluent spillages and associated emergency</p>	<p>Noted. Refer to amendments made in BAR document.</p> <p>Noted. Please refer to storm water management plan upgrades to infrastructure proposed and amendments to EMP to address these issues.</p>
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		<p>clean-up procedures.</p> <p>This office does not believe that the current effluent treatment facility (constructed 2010) has sufficient capacity to treat the current effluent emanating from CF Hocraft abattoir and rendering facilities, not to mention the new extensions discharge volumes. Furthermore, over-saturation of the ground due to over irrigation has led to surface water run-off directly to the tributary feeding into the Mosselbank River. It is therefore believed that the capacity of the current effluent treatment facility must be enlarged and the release of treated waste water into the Mosselbank River during summer and winter months MUST be limited in order to reduce the likelihood and extent of eutrophication within the river and its effects such as localised development and anoxic pools.</p> <p>Load shedding is a reality that must be considered in applications. Raw, untreated effluent cannot be allowed to discharge directly into the Mosselbank River in the case of a load shedding event and this office is of the opinion that there is sufficient backup power supply to cater for the current effluent treatment facility and proposed upgrades at the CF Hocraft facilities. Which step will be implemented to ensure continuous electrical supply to these facilities?</p> <p>If raw untreated or treated abattoir effluent is</p>	<p>Noted. Please refer to amendments to reports, applications, licenses and authorizations, and infrastructure to ensure that all effluent is treated in terms the DWS license requirements. Please also take note that infrastructure was installed to recycle and reuse the treated effluent to reduce water consumption and the release of treated effluent into the environment.</p> <p>Noted. The necessary buffer capacity is designed into the WWTW to cater for electricity outages and alarms are fitted to warn of failure to equipment or power outages. Furthermore, special agreements are in place between ESKOM and the facility not to cut electricity to the facility due to several reasons.</p> <p>Noted. Refer to responses above with regards</p>
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		<p>not pumped to the existing Fisantekraal Waste Water Treatment Works (WWTW), then this office recommends that the final treated effluent emanating from the upgrade effluent treatment facility be used for irrigation purposes. Discharge into the Mosselbank River MUST be avoided at all cost, due to the new housing developments downstream of CF, straddling the Mosselbank River. CF MUST engage with neighbouring farm owners and investigate the establishment of a Water Scheme Supply Agreement and develop appropriate irrigation infrastructure, to minimise the treated effluent discharge volumes into the Mosselbank River.</p> <p>With reference to email correspondence between this office and Eco Impact dated Friday 25 October 2015 at 01:33PM (attention: Mr Nicolaas Hanekom) there are a substantial number of outstanding storm water issues (listed below). These issues were part of the previous DEA&amp;DP; DWS as well as the Cities Stormwater By-law transgression directives. These outstanding stormwater issues listed below must be included and provided in this EIA process.</p> <ol style="list-style-type: none"> <li>i. Stormwater overland (sheet flow) runoff calculations for the entire of CF Hocraft abattoir precinct/farm and associated stormwater attenuation facilities;</li> <li>ii. Civil engineering design drawings for the stormwater dam must be provided. The following drawings are required: <ul style="list-style-type: none"> <li>• Stormwater pond design;</li> </ul> </li> </ol>	<p>to the upgrades to the WWTW.</p> <p>Noted. Refer to storm water management plan attached as specialist report to the BAR.</p>
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		<ul style="list-style-type: none"> <li>• Inlet &amp; outlet structures;</li> <li>• Forebay and stilling basin;</li> <li>• Emergency overflow structures; and</li> <li>• Erosion protection</li> </ul> <p>iii. The approved Water Use Licence from DWS which allows CF to discharge treated effluent water into the Mosselbank River as well as discharge quantity (m<sup>3</sup>) allowed during winter and summer months respectively.</p> <p>iv. The written agreement between Garden Cities tenant (Groenvlei Gras) and CF, concerning the treated effluent water transfer and usage</p> <p>v. Treated effluent discharge volumes to Groenvlei Gras during winter and summer months must be quantified.</p> <p>With reference to the email correspondence between this office and DWS dated Monday 11 August 2015 at 09:58AM (Attention: Mr Warren Dreyer). This offices posed the following questions to Mr Dreyer:</p> <p>(1) Would you be so kind and advise on the current status quo of County Fair Foods Water Use Licence Applications;</p> <p>(2) Has it been approved and</p> <p>(3) Please forward a copy of the approved Water Use Licence to this office.</p> <p>Mr Dreyer replied that CF Water Use Licence application is still being assessed and he will meet with CF consultant soon. No feedback in this regard has been received.</p>	<p>Refer to attached permits and licenses in BAR .</p> <p>Water Use License issued and attached as report to BAR.</p>
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		<p>A stormwater Management Plan (SWMP) MUST be compiled and submitted to this office for approval, for the entire CF Hocraft facility/precinct/farm situated on portion of farm no. 724, Kraaifontein. This SWMP MUST indicate impacts of the current and future operation activities on storm water runoff management on/from this site as well as surrounding erven, furthermore, this SWMP must address the following issues:</p> <ul style="list-style-type: none"> <li>i. Protect stability of downstream channels by 24 hour extended detention of the 1 year RI 24 hour storm event;</li> <li>ii. Protect downstream properties from fairly frequent nuisance floods by reducing the peak flow to pre-development levels for all events up to the 10 year RI peak flow</li> <li>iii. Protect floodplain developments and floodplains from adverse impacts of extreme floods by reducing the peak flow to existing development levels for all events up to the 50 year RI peak flow;</li> <li>iv. Elaborate on stormwater runoff treatment/quality improvements as stipulated in the Management of Urban Stormwater Impacts Policy, approved by Council: 27 May 2009. The design storm event for water quality treatment is the ½ year RI, 24 hour storm, and pollution removal targets are 80% reduction in suspended solids and 45% reduction in total phosphorous.</li> <li>v. Management of overland stormwater un-off</li> </ul>	Noted. Refer to responses above.
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		<p>from this erf/farm and surrounding properties, especially upstream properties.</p> <p>vi. Indication bunded refuelling stations and elaborates on emergency procedures during hydraulic oil or diesel spillage event etc.</p> <p>vii. Identification and accommodation of stormwater overland escape routes for floods greater than the 1:50 year storm event for the mining site.</p> <p>viii. Expansion of the existing effluent treatment facility to treat current and proposed abattoir and rendering facility untreated effluent discharge.</p> <p>ix. Design of attenuation facilities for effluent discharge (treated and untreated) from the current and proposed abattoir and rendering facility extensions.</p> <p>x. Elaborate on implementation of Best (Stormwater) Management Practices (BMP) on this development precinct, to reduce stormwater runoff i.e. reuse of water in the abattoir facilities, water features, rain gardens, vegetated bio-swales, infiltration planters, irrigation, etc.</p> <p>Management of CF Hocrast facilities MUST attached the following to the SWMP:</p> <ul style="list-style-type: none"> <li>• The approved Water Use Licence from DWS; and</li> <li>• The Irrigation Agreement between CF and Groenvlei Gras (Julian Visser)</li> </ul> <p>In addition if any of the steps required above will require further authorisation from any other</p>	<p>Noted.</p>
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		<p>organ of state, such authorisation must be obtained and be brought to the this offices attention. (e.g. Water Use Licence, Environmental Authorisation, General Authorisation, Waste Management Licence, etc.)</p> <p><b><u>Specialised Environmental Health Services: City Health – Air Quality Management</u></b></p> <p>In terms of the National Environmental Management: Air Quality Act (Act 39 of 2004), the upgrading of the abattoir triggers a Variation and amendment of the existing Atmospheric Emissions Licence – WCCT 022.</p> <p>Application is to be made for the installation of the new boiler in terms of the Air Quality Management By-Law 2010.</p> <p>Recommended odour control measures – The best practicable environmental options are to be used to mitigate odour, air pollution and other emissions from the facility.</p> <p>During Construction – City Health Air Quality Management unit requires a dust management plan and a dust monitoring programme during the construction phase of the development. Best practical environmental options must be used to prevent and abate dust emissions into the atmosphere.</p> <p>Please be aware of the National Dust Control Regulations , No.R.827 of 1 November 2013</p>	<p>Correct.</p> <p>Noted. Included in EMP.</p> <p>Noted. Refer to AEL variation application and details included in EMP.</p> <p>Refer to EMP for details on dust management and monitoring.</p>
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		<p>which stipulates that dust fall at the boundary or beyond the boundary of the premises where it originates may not exceed:</p> <ul style="list-style-type: none"> <li>(a) 600mg/m<sup>2</sup>/day in residential areas measured using reference method ASTM D1739; or</li> <li>(b) 1200mg/m<sup>2</sup>/day in non-residential areas measured using reference method ASTM D1739</li> </ul> <p>Dust control from roads – All roads which provided access to the facility and surroundings farms should be tarred to prevent any fugitive dust emissions caused by vehicular traffic. Refer to the communication National DEA regarding the submission of emissions testing report to NAEIS.</p> <p>Please note: an electronic Atmospheric Emissions Licence Variation application needs to be submitted on SAAELIP (South African Atmospheric Emissions Licencing &amp; Inventory Portal)</p> <p>The operation of the site should be compliant with all the stipulations of the CoCT Air Quality Management By-law (2010)</p>	<p>All access roads are existing and have a concrete or tarred cover. The onsite roads will be gravel, but vehicle traffic will be slow and dust impacts low. The dust will however be managed in terms of the EMP requirements.</p> <p>Noted. Refer to proof of submission attached to documents.</p> <p>Noted.</p>
<p>DEA&amp;DP Pollution Management Ms Xenthia Smith Ref: 16/3/3/6/7/1/A5/37/2318/15</p>	<p>17/11/2015</p>	<p><b>Operations Management</b></p> <p>A complaints register must be kept on site to record all complaints. The register must contain the name of the complainant, the date of the complaint and the reaction to valid interventions followed to resolve the issue/s.</p>	<p>Noted. A complaints register is already on site and will be maintained.</p>

		<p>The CEMP does not specify the dust suppression measures to be undertaken. The Final CEMP must stipulate these measures. If water is to be used, it must preferably be non-potable water. The Final BAR must indicate the current amount of chickens being slaughtered per day.</p> <p>Also stipulate whether mortalities from natural deaths will also be processed.</p> <p>Indicate the current effluent discharge volume and by how much it will increase with the expansion. The Final BAR must indicate what happens the the final effluent, especially during winter when irrigation may not be required as much. Also state whether irrigation of final effluent only takes place on County Fair property or on neighbouring property as well.</p> <p>Indicate the current volume of water used in the process and by how much this will increase.</p> <p><b>Waste Management</b> Cement batching done during construction phase must be done on an impermeable surface to avoid soil and water contamination.</p> <p><b>General</b></p>	<p>Refer to amended EMP for more details.</p> <p>The BAR did indicate the number of chickens to be slaughtered. The application is for 2.2 million per week (314 286 per day on a 7 day per week schedule and 366 667 on a 6 day per week schedule).</p> <p>Mortalities from natural deaths are already rendered at the facility and this will continue as per the past.</p> <p>The planned expansions will generate 4 400 m<sup>3</sup> per day effluent. Note that the expected wastewater flow of 4,400 m<sup>3</sup>/day is not really of concern, because the WWTW was originally designed to handle a hydraulic load of 5,500 m<sup>3</sup>/day. Please refer to amended BAR and reports for more detail.</p> <p>Please refer to BAR report for detail on water usage.</p> <p>Noted. EMP amended to include this.</p>
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		This Directorate requests a copy of the final effluent discharge quality results for the past three years as well as the freshwater study that was previously done.	Noted. Please find attached.
DEA&DP Waste Management Mr Gary Arendse Ref: 16/2/5/3/A5/37/WL0045/15	05/11/2015	<p>Any resulting waste material generated during the construction, operational and decommissioning of the proposed development, may only be disposed of at a licenced waste disposal facility and may not be disposed of on site. Waste may temporarily be stored for a period up to 90 days.</p> <p>Please adhere to the National Norms and Standards for the Storage of Waste in terms of the GN. No. 926 of 29 November 2013, if the volumes of waste stored exceeds 80m<sup>3</sup> for hazardous waste and/or 100m<sup>3</sup> for general waste.</p> <p>The disposal of waste should be considered as a last resort after having considered the re-use and recycling of waste.</p> <p>Waste minimisation should be implemented such as the avoidance, reduction, re-use and recycling of waste during the construction, before considering disposal of such waste.</p> <p>Please note that GN No. 921 "List of waste management activities that have or are likely to have a detrimental effect on the environment" must be taken into consideration as GN No. 718 is not in use anymore.</p> <p>The Department would like to do a site visit to</p>	<p>Noted. Included in EMP.</p> <p>Noted. Included in EMP.</p> <p>Noted. Included in EMP.</p> <p>Noted. Included in EMP.</p> <p>Noted. Please find attached Waste License Application and relevant documents in applying for a Waste License.</p> <p>Noted.</p>

		<p>the facility.</p> <p>Please inform the Department on what the current capacity of CF Hocraft facility is.</p> <p>The Department requests that a presentation be done in order to clarify the expansion plans as well as the processes of it once in operation.</p> <p>Raw material is received from farms and not only generated by the facility, and is therefore seen as waste.</p> <p>Infectious animal carcasses are regarded as hazardous waste. Please note that if infectious animal waste and carcasses are missed with general/commended animal waste the whole volume of waste will be regarded as hazardous. It is therefore recommended that infectious animal waste not be mixed with general/non-infectious animal waste.</p> <p>Based on the information submitted, the Department is of the opinion that the following listed activities in GN No. 921 will be triggered (depending on the volumes):  Category A (3): (6); (7) &amp; (12)  Category B (4)(4), (6) &amp; (10)</p> <p>If any animal carcasses are disposed of on the farm or on any surrounding land this is in contravention of NEM:WA as amended, "National Norms &amp; Standards for Disposal of</p>	<p>Please refer to amended BAR for details.</p> <p>Noted. Site visit was conducted and meeting held with the department.</p> <p>Noted.</p> <p>Noted. Infectious animal carcasses not rendered or received on site.</p> <p>Noted. Please find attached Waste License Application and relevant documents in applying for a Waste License.</p> <p>Noted. No animal carcasses are disposed of on the farm or on any surrounding land.</p>
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		<p>Waste to Landfill' (GN 636) dated 23 August 2013. In terms of Regulation 4 of GN No 636, non-infectious animal carcasses may only be disposed of at a CLASS B waste disposal facility or at one designed in accordance with the requirements for a GLM+ waste disposal facility as specified in DWAF Minimum Requirements for Disposal by Landfill (2<sup>nd</sup> Edition, 1998).</p> <p>In terms of Regulation 5 of GN No. 636, infectious animal carcasses and animal waste are prohibited from disposal to a land with immediate effect, implying that it needs to be treated before disposal at a CLASS B waste disposal facility or at one designed in accordance with the requirements for a GLB+ waste disposal facility.</p>	Noted. Not applicable to this site or application.
<p>Department of Water &amp; Sanitation Thandi Mmachaka Ref: 16/2/7/G22/A/8</p>	03/11/2015	<p><b>Water Use &amp; Authorisation</b> DWS noted that the proposed activity does not trigger any water use in terms of Section 21 of the National Water Act. Please note that the proposed activities do not require a water use authorisation from DWS in terms of Section 22 of the National Water Act.</p> <p><b>General</b> The following conditions must be adhered to at all times: No pollution of surface or ground water resources may occur due to activities related to the proposed development on the property; Oil spillages from vehicles on site must be</p>	<p>Noted. However, please refer to changes which will result in a amendment of the existing Water Use License.</p> <p>Noted. All included in EMP.</p>

		controlled to prevent pollution of water resources; and Soil erosion on site must be prevented at all times, during and post construction activities.	
Heritage Western Cape Waseefa Dhansay Case Number: 15060703WD0724E	03/08/2015	You are hereby notified that, since there is no reason to believe that the abattoir and rendering facility will impact on heritage resources, further processes under Section 38 of the National Heritage Resource Act does not apply. However should any evidence of human burials be discovered during execution of the activities, above all works must be stopped immediately and HWC be notified without delay.	Noted.
Department of Agriculture Mr Cor van der Walt Ref: 20/9/2/5/4/360	24/11/2015	The Department of Agriculture: Western Cape has no objection to the proposed expansion of the CF Hocraft abattoir and rendering facilities on Farm 724, Kraaifontein.	Noted.
Garden Cities Mrs S Majiet	14/10/2015	We hereby wish to register as an Interested and Affected Party for the proposed expansion of the County Fair Hocraft abattoir and rendering facility.  As an adjacent landowner and developer of the approved and authorised residential development Greenville Garden City located in close proximity to the County Fair (Portion 16 of Farm No. 724, Joosentbergvlakte). Our concerns regarding the proposed project are listed but are not confined to the below; Odours as a result from the abattoir operations The potential increase of atmospheric emissions released Impact on the development of Greenville housing	Noted.  Noted. Reported as such in the BAR report.  Noted. Please refer to EMP and Atmospheric Emissions License variation application for more detail on odour impact management. The housing development and previous

		development and agreements previously deemed with County Fair (Astral Operations Ltd) Further impacts on the quality of treated effluent being irrigated on landholding.	agreements between County Fair and Garden Cities were included in the design and management measures included in the reports.
CapeNature Rhett Smart	24/11/2015	<p>CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.</p> <p>The application is for the expansion of an existing abattoir and associated poultry processing facilities. The expansion footprint will not encroach into any natural vegetation according to the Biodiversity Network for the City of Cape Town, which is verified through the site description and photographs. The natural vegetation fragments in the surroundings are unlikely to be affected by the proposed expansion, therefore CapeNature is satisfied that the proposed expansion will not result in the loss of important habitat.</p> <p>There are several wetlands mapped on the property, including three farm dams (other ecological support area) and a natural wetland directly downstream, classified as Critical Ecological Support Area. The wetlands are associated with the headwaters of a minor tributary of the Mosselbank River. The Draft Basic Assessment Report (BAR) indicates that there are no surface water features on or adjacent to the site, which is incorrect (Section</p>	<p>Noted.</p> <p>Correct.</p> <p>Correct. Reported as such in the reports.</p>

		<p>B.4). The wetlands are indicated on Cape Farm Mapper, which was used to generate the locality maps.</p> <p>Although the proposed expansion footprint will not be within the areas mapped as wetlands, the nature of the operations on site have the potential to impact on the wetlands and associated watercourse, particularly with regards to water quality. Polluted run-off from the facility has the potential to result in significant impacts on the freshwater environment.</p> <p>Any potential impacts on the freshwater environment would be existing due to the existing facility, however an expansion would result in an increase in potential impacts. The impact on water quality and the freshwater environment has not been included in the impact assessment section of the Draft BAR, or addressed elsewhere in the report.</p> <p>Detailed information is required regarding the existing situation with regards to wastewater and effluent management and the impacts on the freshwater environment. This must include a detailed description of the management of waste and run-off and methodologies in place to prevent pollution of the freshwater environment. Evidence must be provided that there are no significant current impacts e.g. water quality testing. In addition, a description must be provided of how the expansion will be accommodated within the existing measures to prevent impacts on water quality. If this information cannot be provided in the Final BAR,</p>	
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		<p>then a freshwater specialist study is required, with a specific focus on water quality and recommendation of relevant mitigation measures.</p> <p>CapeNature recommends that the above information is provided before this application is assessed further.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	
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CITY OF CAPE TOWN  
ISIXEKO SASEKAPA  
STAD KAAPSTAD

ENERGY, ENVIRONMENTAL AND SPATIAL PLANNING DIRECTORATE  
ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT

Lesley Wollensberger-Belts  
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File reference: KPN 21/1/2/2/156

2015-11-11

Eco Impact  
P. O. Box 45070  
Claremont  
7735

Attention: Nicolaas Hanekom ([nicolaas@ecoimpact.co.za](mailto:nicolaas@ecoimpact.co.za) / [admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za))

Dear Sir,

**COMMENT ON PRE-APPLICATION CONSULTATIVE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF THE ABATTOIR AND RENDERING FACILITY AND ATMOSPHERIC EMISSIONS LICENSE VARIATION, PORTION OF FARM JUMBO 724, DURBANVILLE.**

The draft Basic Assessment Report (draft BAR) dated October 2015 was circulated to the various departments of the City of Cape Town. The following comments are provided:

**1. ENVIRONMENTAL AND HERITAGE MANAGEMENT BRANCH – PAT TITMUS**

- 1.1. It is unclear why the effluent treatment facility is not being upgraded as part of this process. If the facility is being expanded to allow for an increase in slaughtering of chickens, surely there will be an increase in effluent which will need to be accommodated on site. The applicant is reminded of the effluent capacity issues that were experienced in 2006/2007 as well as 2013 where raw untreated abattoir sludge was being discharged directly into the Mosselbank River due to operational failures experienced with the effluent treatment facility. Without a proper motivation as to why the effluent facility will not be upgraded, it is logical to assume that the failure of this facility will be more frequent, thereby increasing the impact the facility may have on the receiving environment.
- 1.2. Section B (4) has been completed erroneously. The author fails to mention the Mosselbank River and associated wetlands on the property, a few hundred metres south west of the facility. This is important in that any effluent overflows will directly impact on this river.
- 1.3. Similarly, Section B 7(a) highlights the occurrence of a nearby river however does not give the detail pertaining to the proximity of the river to the existing and proposed facility. The river is closer than both the Greenville, Fisantekraal, Kraaifontein, Uitzicht and Joostenbergvlakte areas but is not mentioned in the detailed description in 7(b) of the draft BAR.
- 1.4. Section F (2) does not address how the 5 500 cubic meters of waste water will be disposed of. As this section details waste emissions, this should be detailed here. In the 2013 the surrounding grounds of the County Fair farm were being irrigated with this water. Over irrigation lead to the ground becoming saturated and waste water was allowed to run directly into the Mosselbank River. This is problematic as this leads to nitrification of the water and pollution of the river.
- 1.5. This Branch is of the opinion that not all the operational impacts of the proposed facility have been addressed in this report. In terms of the increase in the production of waste water, the impact of this has not been assessed as it is not clearly stated in the report how this water will be used / disposed of. Using this water for irrigation purposes will have a direct impact on the biological environment which has been highlighted in point 1.4 above. This must be further addressed in the final BAR.

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- 1.6. The quarterly monitoring of the water quality of the Mosselbank River at the point of entrance and exit of the site should be written in as a recommendation to ensure water quality is not affected by the irrigation of surrounding land with waste water effluent.
- 1.7. ECO monitoring reports must also be sent to this Branch. Please ensure that Section 4.2 of the EMP, as included in Appendix H of the draft BAR must be amended to include the City of Cape Town Environmental and Heritage Management Branch.
- 1.8. It is questioned whether the Operational Environmental Management Plan (OEMP) included in the draft BAR is the currently approved OEMP being used on site? It is advised that the current OEMP for the site be updated where necessary and submitted as part of the final BAR for comment.
- 1.9. Section B [6] indicates that the land use of the site is partly light industrial. As per the comment from Land Use Management (point 2 below) this does not appear to be the case. This must be corrected.

**2. LAND USE MANAGEMENT – DANETTE DE KLERK**

- 2.1. Approval was granted in 2008 for the rezoning of a 12.1ha portion of Portion 16 of Farm 724 from Agriculture Zone 1 in terms of the (then) Section 8 Zoning Scheme in terms of LUPO, to Agriculture Zone 2, to regularise the pre-existing uses on the site (including abattoir) and to allow for extension to and intensification of these uses. Building line departures were also granted at the same time to accommodate the existing buildings, with building lines being relaxed from 30m to 10m.
- 2.2. With the change to the City's integrated Cape Town Zoning Scheme, an Agriculture Zone zoning was assigned to this property. The existing uses on the portion for which the abovementioned approval was granted, therefore became lawful non-conforming uses.
- 2.3. As the approval was granted for the entire 12.1ha portion of the site, without any conditions limiting the scale and extent of the activities, it is considered that the lawful non-conforming use (including abattoir and associated 'rendering' activities) applies to the entire portion of the site.
- 2.4. As such, no further land use application is required for the proposed extensions and increased intensity of operations, provided that:
  - 2.4.1. The nature of the activities are as those for which approval was granted previously, and
  - 2.4.2. All the proposed extensions fall within the area rezoned to Agriculture Zone 2 in terms of the previous approval.
- 2.5. The proposed new building extensions encroach into the 30m building lines, and as such, an application for a permanent departure is required

**3. UTILITY SERVICES: WATER SERVICES – JACO DE BRUYN**

- 3.1. No service report has been included with the application; it is unclear whether any additional water demand and sewage discharge will be applicable. This can only be determined once the necessary info has been provided.
- 3.2. The industrial process will need to be evaluated by the Water Pollution Control Section but this will probably only be at building plan stage.

**4. ENVIRONMENTAL HEALTH – GAWIE SMITH / JACKIE HINTENAU**

- 4.1. The applicant must comply with the City of Cape Town, Environmental Health By-Law, No. 13333 of June 2003, Part 1, (Prevention and Suppression of Health Nuisances).
- 4.2. Building plans must be submitted for new buildings and for any alterations to the existing building.
- 4.3. Facilities must be provided for persons with disabilities in accordance with SANS 10400 –S: 2011 Edition 3. This includes ramps/ walkways, toilet facilities and removal of obstructions in the path of travel of disabled persons.
- 4.4. Adequate toilet facilities must be provided in accordance with SANS 0400 of 1990 (Table 6).
- 4.5. The premises must comply with the Western Cape Noise Control Regulations P.N. 200/2013 by not creating a disturbing noise or noise nuisance to surrounding property owners.
  - Any noise producing plant or equipment must be adequately muffled.
- 4.6. The premises must comply with the Tobacco Product Control Act, Act no 83 of 1993 as amended.
- 4.7. The premises must be made rodent proofed in accordance with the Government Rodent Proofing Regulations.

- 4.10 All sewage & waste waters must be handled and treated and disposed of in such a manner that it causes no health nuisance/hazard to anyone who may be working on the premises, abutting neighbours, any visitors to the premises and the environment.
- 4.11 The water quality of the final waste water must comply with the standards as set out in the National Water Act, Act no 36 of 1998.
- 4.12 Monitoring and management measures must be put in place to control and prevent the breeding of flies, insects and odors that may originate from these activities.
- 4.13 Effective dust control measures must be put in place.

**5. TRANSPORT FOR CAPE TOWN: STORMWATER & SUSTAINABILITY – JOHANN TERBLANCHE**

- 5.1. The proposed new infrastructure and extensions will all take place next to the existing abattoir and rendering facility on the area that is zoned Agri-Industrial. These new additions (facilities and infrastructure) will create increased and concentrated stormwater runoff.
- 5.2. The P-DBAR, Section B, APPLICABLE LEGISLATION, POLICIES AND /OR GUIDELINES, page 17 must be amended by adding the following to the listing:
  - i. Management of Urban Stormwater Impacts Policy, Approved By Council : 27 May 2009
  - ii. Floodplain and River Corridor Management Policy, Approved by council : 27 may 2009
  - iii. By-Law Relating to Stormwater Management, Approved by Council : 30 August 2005
- 5.3. In 2006/ 2007 as well in 2013 County Fair dumped raw untreated abattoir sludge directly into the Mosselbank River due to operational failures within County Fair's Hocraft abattoir and rendering facility. In both cases County Fair neglected to act immediately and waited upon the City of Cape Town to engage with them before actions were initiated to appoint an environmental consultant to do the necessary damaged control and Mosselbank River rehabilitation. This is proof that there are no/ limited contingency measures in place to prevent or resolve an untreated abattoir sludge spillage incident timeously. A revised Operational Environmental Management Programme (EMP) for this site must therefore be compiled. This OEMP must include inputs from City of Cape Town and the Department of Water and Sanitation. It must address stormwater management issues, untreated effluent spillages and associated emergency clean-up procedures.
- 5.4. This office does not believe that the current effluent treatment facility (constructed in 2010) has sufficient capacity to treat the current effluent emanating from County Fair Hocraft abattoir and rendering facilities, not to mention the new extensions discharge volumes. Furthermore, over-saturation of the ground due to over irrigation has led to surface water run-off directly to the tributary feeding into the Mosselbank River. It is therefore believed that the capacity of the current effluent treatment facility must be enlarged and the release of treated wastewater into the Mosselbank River during summer and winter months must be limited in order to reduce the likelihood and extent of eutrophication within the river and its effects such as localised development of anoxic pools.
- 5.5. Load shedding is a reality that must be considered in applications. Raw, untreated abattoir effluent cannot be allowed to discharge directly into the Mosselbank River in the case of a load shedding event and this office is of the opinion that there is sufficient backup power supply to cater for the current effluent treatment facility and proposed upgrades at the County Fair Hocraft abattoir and rendering facilities. Which steps will be implemented to ensure continuous electrical supply to these facilities?
- 5.6. If raw untreated or treated abattoir effluent is not pumped to the existing Fisantekraal Waste Water Treatment Works, then this office recommends that the final treated effluent emanating from the upgraded effluent treatment facility be used for irrigation purposes. Discharge into the Mosselbank River must be avoided at all cost, due to the new housing developments downs stream of County Fair's precinct, straddling the Mosselbank River. County fair must engage with neighbouring farm owners and investigate the establishment of a "Water Scheme Supply Agreement" and develop appropriate irrigation infrastructure, to minimise the treated effluent discharge volumes into the Mosselbank River.
- 5.7. With reference to email correspondence between this office and Eco Impact dated Friday, 25 October 2013 at 01:33 PM (attention Mr. Nicolaas Hanekom) there are a substantial number of outstanding stormwater issues (listed below). These issues were part of the previous **Department of Environmental Affairs and Development Planning, Department of Water & Sanitation** as well as City's Stormwater By-law transgression directives. These outstanding stormwater issues, listed below, must be included and provided in this EIA process.

- i. Stormwater overland (sheet flow) runoff calculations for the entire of County Fair Hocratt abattoir precinct/ farm and associated stormwater attenuation facilities;
  - ii. Civil engineering design drawings for the new stormwater dam must be provided. The following drawing area required:
    - a. stormwater pond design
    - b. inlet & outlet structures
    - c. forebay and stilling basin
    - d. emergency overflow structures
    - e. erosion protection
  - iii. The approved Water Use License from the Department of Water & Sanitation which allows County Fair to discharging treated effluent water into the Mosselbank River, as well as the discharge quantity (m<sup>3</sup>) allowed during the winter and summer months respectively.
  - iv. The written agreement between Garden Cities tenant (Groenvlei Gras) and County Fair, concerning the treated effluent water transfer and usage.
  - v. Treated effluent discharge volumes to Groenvlei Gras during winter and summer months respectively, **must** be quantified.
- 5.8. With reference to email correspondence between this office and Department of Water & Sanitation dated Monday, 11 August 2014 at 09:58 AM (Attention Mr. Warren Dreyer). This office posed the following questions to Mr. Warren Dreyer; "(1) Would you be so kind and advise on the current status quo of County Fair Foods (Pty) Ltd Water Use Licence Applications. (2) Has it been approved? (3) Please forward a copy of the approved Water Use Licence to this office?"

Mr. Warren Dreyer replied that County Fair Foods (Pty) Ltd Water Use Licence Application is still being assessed and he will meet with County Fair Foods (Pty) Ltd consultant soon. No feedback in this regard has been received.

- 5.9. A Stormwater Management Plan (SWMP) **must** be compiled and submitted to this office for approval, for the entire County Fair Hocratt abattoir and rendering facility/ precinct / farm situated on portion of farm Jumbo no. 724, Kraaifontein. This SWMP **must** indicate impacts of the current and future operations activities on stormwater runoff management on/ from this site as well as surrounding erven; furthermore, this SWMP must address the following issues:
- i. Protect stability of downstream channels by 24 hour extended detention of the 1 year RI, 24 hour storm event.
  - ii. Protect downstream properties from fairly frequent nuisance floods by reducing the peak flow to pre-development levels for all events up to the 10 year RI peak flow.
  - iii. Protect floodplain developments and floodplains from adverse impacts of extreme floods by reducing the peak flow to existing development levels for all events up to the 50 year RI peak flow.
  - iv. Elaborate on stormwater runoff treatment/quality improvements as stipulated in the Management of Urban Stormwater Impacts Policy, approved by Council: 27 May 2009. The design storm event for water quality treatment is the 1/2 year RI, 24 hour storm, and pollution removal targets are 80% reduction in suspended solids and 45 % reduction in total phosphorous.
  - v. Management of overland stormwater run-off from this erf/ farm (farm Jumbo no. 724) and surrounding properties, especially upstream properties.
  - vi. Indication bunded refuelling stations and elaborates on emergency procedures during hydraulic oil or diesel spillage event etc.
  - vii. Identification and accommodation of stormwater overland escape routes for floods greater than the 1: 50 year storm event for the mining site.
  - viii. Expansion of the existing effluent treatment facility to treat current and proposed abattoir and rendering facility untreated effluent discharge.
  - ix. Design of attenuation facilities for effluent discharge (Treated or untreated) from the current and proposed abattoir and rendering facility extensions.
  - x. Elaborate on implementation off Best (Stormwater) Management Practices (BMP) on this development precinct, to reduce stormwater runoff i.e. reuse of water in the abattoir facilities, water features, rain gardens, vegetated bio-swales, infiltration planters, irrigation etc.

- 5.10. Management of County Fair Hacroff abattoir and rendering facility, **must attach** the following to the SWMP as an annexure;

5.10.1. The approved Water Use Licence from the Department of Water & Sanitation.

5.10.2. The Irrigation agreement between County Fair and neighbour, Julian Visser from Groenvlei Gras.

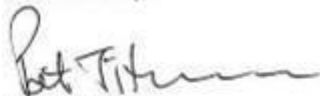
- 5.11. In addition, if any of the steps required above will require further authorisation from any other organ of state, such authorisation (s) must be obtained and be brought to this office's attention. (E.g. Water Use License, Environmental Authorisation, General Authorisation or renewal/ amendment etc.)

**6. SPECIALISED ENVIRONMENTAL HEALTH SERVICES: CITY HEALTH – AIR QUALITY MANAGEMENT – BETHWELL MBETE**

- 6.1. In terms of The National Environmental Management: Air Quality Act, (Act No.39 of 2004), the upgrading of the abattoir triggers a Variation and amendment of the existing Atmospheric Emissions Licence – WCCT 022.
- 6.2. Application is to be made for the installation of the new boiler in terms of the Air Quality Management By-Law 2010.
- 6.3. **Recommended odour control measures** - The best practicable environmental options are to be used to mitigate odour, air pollution and other emissions from the facility.
- 6.4. **During Construction** - City Health Air Quality Management unit requires a dust management plan and a dust monitoring programme during the construction phase of the development. Best practical environmental options must be used to prevent and abate dust emissions into the atmosphere.
- 6.5. Please be aware of the National Dust Control Regulations, No.R 827 of 1 November 2013 which stipulates that dust fall at the boundary or beyond the boundary of the premises where it originates may not exceed:
- (a) 600 mg/m<sup>2</sup>/day in residential areas measured using reference method ASTM D1739; or
  - (b) 1200 mg/m<sup>2</sup>/day in non-residential areas measured using reference method ASTM D1739.
- 6.6. **Dust control from roads** - All roads which provide access to the facility and surrounding farms should be tarred to prevent any fugitive dust emissions caused by vehicular traffic.
- 6.7. Attached please find communiqué from National DEA regarding the submission of emissions testing reports to NAEIS.
- 6.8. **Please note:** An electronic Atmospheric Emissions Licence Variation application need to be submitted on SAAELIP (South African Atmospheric Emission Licensing & Inventory Portal).
- 6.9. The operation of the site should be in compliant with all the stipulations of the City of Cape Town Air Quality Management By-Law (Provincial Gazette 6772 dated 30 July, 2010).

The City reserves the right to revise initial comments and request further information based on any new or revised information received.

Yours sincerely,



**PAT TITMUSS**

**Regional Manager: Environmental & Heritage Management – Northern District**



**Western Cape  
Government**  
Environmental Affairs and  
Development Planning

Directorate: Pollution and Chemicals Management  
Ms. X. Smith

**ENQUIRIES:** Xenthia Smith

**REFERENCE:** 16/3/3/6/7/1/A5/37/2318/15

Nicolaas Hanekom  
Eco Impact Legal Consulting (Pty.) Ltd.  
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**COMMENTS: DRAFT BASIC ASSESSMENT REPORT (DBAR) FOR THE COUNTY FAIR - EXPANSION OF ABATTOIR AND RENDERING FACILITY AND ATMOSPHERIC EMISSIONS LICENSE VARIATION, PORTION OF FARM JUMBO, NO.724, KRAAIFONTEIN**

The above-mentioned documentation received by the Directorate: Pollution and Chemicals Management (D: PCM) refers. The following comments must be addressed in the Final Basic Assessment Report (FBAR) and Final Environmental Management Programme (FEMP).

**1) Operations Management**

- a) A complaints register must be kept on site to record all complaints. The register must contain the name of the complainant, the date the complaint was made and the reaction to valid interventions followed to resolve the issue/s;
- b) The Construction Environmental Management Programme (CEMP) does not specify the dust suppression measures to be undertaken. The Final CEMP must stipulate these measures. If water is to be used, it must preferably be non-potable water.
- c) The FBAR must indicate the current amount of chickens being slaughtered per day. Also stipulate whether mortalities from natural death will also be processed.
- d) Indicate the current effluent discharge volume and by how much it will increase with the expansion. The FBAR must indicate what happens to the final effluent, especially during winter when irrigation may not be required as much. Also state whether irrigation of final effluent only takes place on County Fair property or on neighbouring property as well.
- e) Indicate the current volume of water used in the process and by how much this will increase.

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**2) Waste Management**

- a) Cement batching done during the construction phase must be done on impermeable surface to avoid soil and water contamination.

**3) General**

- a) The D: PCM requests a copy of the final effluent discharge quality results for the past three years as well as the freshwater study that was previously done.

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

Yours faithfully,



**Wilna Kloppers (Mrs)**  
**Director: Pollution & Chemicals Management**

Date: 17/11/2015





**REFERENCE:** 19/2/5/3/A5/37/WL0045/15

The Director/s  
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P.O. Box 45070  
**CLAREMONT**  
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Tel: (021) 671 1660/9976

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**For attention:** Nicolaas Hanekom

**COMMENT ON THE CONSULTATIVE DRAFT BASIC ASSESSMENT REPORT (BAR) FOR THE PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING FACILITY AND VARIATION OF THE AIR EMISSIONS LICENCE, PORTION OF FARM JUMBO 724, KRAAIFONTEIN.**

1. The request for comments on the above-mentioned consultative draft BAR dated 8 October 2015 and received by this Department on 12 October 2015, refers.
2. The Sub-Directorate: Waste Management Licensing has the following comments on the above-mentioned consultative BAR:
  - 2.1 Any resulting waste material generated during the construction, operation and commissioning of the proposed development, may only be disposed of at a licensed waste disposal facility and may not be disposed of on-site. Waste may temporarily be stored for a period up to 90 days.
  - 2.2 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 80m<sup>3</sup> for hazardous waste and/or 100m<sup>3</sup> for general waste.
  - 2.3 The disposal of waste should be considered as a last resort after having considered the re-use and recycling of waste.
  - 2.4 Waste minimisation should be implemented, such as the avoidance, reduction, re-use and recycling of waste during construction, before considering the disposal of such waste.

- 2.5 Please note that Government Notice No. 921 "List of waste management activities that have, or are likely to have, a detrimental effect on the environment," must be taken in consideration as Government Notice No. 718 is not in use anymore.
- 2.6 The Department would like to do a Site visit of the Facility.
- 2.7 Please inform the Department on what the current capacity of the Facility is.
- 2.8 The Department requests that a presentation be done in order to clarify the expansion plans as well as the processes of it once in operation.
3. Raw material is received from farms and not only generated at the Facility, and is therefore seen as a waste.
4. Infectious animal carcasses are regarded as hazardous waste. Please note that if infectious animal waste and carcasses are mixed with general/condemned animal waste, the whole volume of waste will be regarded as hazardous. It is therefore recommended that infectious animal waste not be mixed with the general/non-infectious animal waste.
5. Based on the information submitted, the Department is of the opinion that the following listed activities in Government Notice No. 921 of 29 November 2013 will be triggered (depending on the volumes):
- 5.1 Category A (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.'*
- 5.2 Category A (3) (7) *'The treatment of hazardous waste using any form of treatment at a facility that has the capacity to process in excess of 500kg but less than 1 ton per day excluding the treatment of effluent, wastewater or sewerage.'*
- 5.3 Category A (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).'*
- 5.4 Category B (4) (4) *'The treatment of hazardous waste in excess of 1 ton per day calculated as a monthly average; using any form of treatment excluding the treatment of effluent, wastewater or sewage.'*
- 5.5 Category B (4) (6) *'The treatment of general waste in excess of 100 tons per day calculated as a monthly average, using any form of treatment.'*
- 5.6 Category B (4) (10) *'The construction of a facility for a waste management activity listed in Category B of this schedule (not in isolation to associated waste management activity).'*

6. If any animal carcasses are disposed of on the farm or on any surrounding land, this is in contravention of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEMWA), as amended, 'National Norms and Standards for Disposal of Waste to Landfill' (Government Notice No. 636), dated 23 August 2013. In terms of Regulation 4 of Government Notice No. R636, **non-infectious** animal carcasses may only be disposed of at a Class B waste disposal facility or at one designed in accordance with the requirements for a GLB+ waste disposal facility, as specified in the Department of Water Affairs and Forestry (DWAF) Minimum Requirements for Waste Disposal by Landfill (2nd Edition, 1998).
7. In terms of Regulation 5 of Government Notice No. R636, **infectious** animal carcasses and animal waste are prohibited from disposal to land with immediate effect, implying that it needs to be treated before disposal at a Class B waste disposal facility or at one designed in accordance with the requirements for a GLB+ waste disposal facility.
8. 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: 2015/11/5



## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

### WESTERN CAPE PROVINCIAL OPERATIONS

Private Bag X16, Sanlamhof, 7532  
52 Voortrekker Road, Bellville, 7530

☎ 021 941 6130  
☎ 021 941 6077  
✉ [mmachaka@dwa.gov.za](mailto:mmachaka@dwa.gov.za)

✉ Ms. T. Mmachaka  
✉ 16/27/G22/A/8

Attention: NZ Loebenberg

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

Dear Madam

### DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTTOIR AND RENDERING FACILITY

Reference is made to the above-mentioned development dated 08 October 2015 with DEA&DP reference number 16/3/3/6/7/1/A5/37/2318/15.

1. **Water Use and Authorization**
  - a) The Department has noted that the proposed activity does not trigger any water use in terms Section 21 of the National Water Act, 1998 (Act 36 of 1998).
  - b) Please note that the proposed activities do not require a water use authorization from this Department in terms of Section 22 of the National Water Act, 1998 (Act 36 of 1998).
2. **Furthermore the following conditions must be adhered to at all times:**
  - a) No pollution of surface water or ground water resources may occur due to activities related to the proposed development on the property.
  - b) Oil spillages from vehicles on site must be controlled to prevent pollution of water resources.
  - c) Soil erosion on site must be prevented at all times, during and post construction activities.

Please do not hesitate to contact the above official should there be any queries.

Yours faithfully

*M. Lintnaar-Strauss*

CHIEF DIRECTOR: WESTERN CAPE

Letter signed by: Mrs M. Lintnaar-Strauss

Designation: Control Environmental Officer: Berg-Olifants Proto CMA

Date:

3 November 2015

16/27/G22/A/8

Page 1 of 1

**Case No:** 15060703WD0724E  
**File No:** HM/ CAPE TOWN METROPOLITAN/ KRAAIFONTEIN/  
PORTION 16 OF FRAM 724  
**Enquiries:** Waseefa Dhansay  
**E-mail:** [waseefa.dhansay@westerncape.gov.za](mailto:waseefa.dhansay@westerncape.gov.za)  
**Tel** 021 483 9533  
**Date:** 03 August 2015



**RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP**  
**In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999) and the**  
**Western Cape Provincial Gazette 6061, Notice 298 of 2003**

NZ LOEBENBERG  
PO BOX 45070  
CLAREMONT  
7735  
[admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)

**NOTIFICATION OF INTENT TO DEVELOP: PORTION 16 OF FARM 724, EXPANSION OF EXISTING FACILITY IN TERMS OF SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter dated 24 July 2015.

You are hereby notified that, since there is no reason to believe that the proposed expansion of the abattoir and rendering facility will impact on heritage resources, further processes under Section 38 of the National Heritage Resources Act (Act 25 of 1999) does not apply.

However, should any evidence of human burials be discovered during the execution of the activities above, all works must be stopped immediately and Heritage Western Cape be notified without delay.

This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.

Should you have any further queries, please contact the official above and quote the case number. Heritage Western Cape reserves the right to request additional information as required.

Yours faithfully

Dr. Errol Myburg  
(Interim CEO: Heritage Western Cape)

[www.westerncape.gov.za/ces](http://www.westerncape.gov.za/ces)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town 8000 • **Postal Address:** Private Bag 91067, Cape Town, 800  
• **Tel:** +27 (0)21 483 9559 • **E-mail:** [hwc@westerncape.gov.za](mailto:hwc@westerncape.gov.za)  
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• **Tel:** +27 (0)21 483 9559 • **E-pos:** [hwc@westerncape.gov.za](mailto:hwc@westerncape.gov.za)



**Western Cape  
Government**

Agriculture

Cor Van Der Walt  
LandUse Management  
Email: LandUse.Elsenburg@elsenburg.com  
tel: +27 21 808 5099 fax: +27 21 808 5092

**OUR REFERENCE : 20/9/2/5/4/360**  
**YOUR REFERENCE : -**  
**DEA&DP REFERENCE : 16/3/3/6/7/1/A5/37/2318/15**  
**ENQUIRIES : Cor van der Walt**

Eco Impact  
PO Box 45070  
CLAREMONT  
7735

Att: Ms NZ Loebenberg

**PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING  
FACILITY: DIVISION PAARL  
PORTION OF FARM JUMBO NO 724**

Your application of 08 October 2015 has reference:

The Western Cape Department of Agriculture has no objection to the proposed expansion of the County Fair Hocraft Abattoir and rendering facility on above mentioned property.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.

[www.elsenburg.com](http://www.elsenburg.com)

[www.westerncape.gov.za](http://www.westerncape.gov.za)

- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely



AS ROUX Pr Eng

**DIRECTOR: SUSTAINABLE RESOURCE MANAGEMENT**  
**2015-11-24**

Copies:

Department of Environmental Affairs & Development Planning  
1 Dorp Street  
CAPE TOWN  
8001

City of Cape Town  
PO Box 25  
Kraaifontein  
7569



56 LOUIS THIBAUT DRIVE  
EDGEMOOR 7441

TELEPHONE 021-558 7181  
TELEFAX 021-558 7172

# GARDEN CITIES

NON PROFIT COMPANY (RF)  
REG. NO. 1928/000837/08

ALL CORRESPONDENCE TO BE ADDRESSED TO:  
THE CHIEF EXECUTIVE OFFICER  
P O BOX 186  
EDGEMOOR 7407

E-MAIL: [info@gcinc.co.za](mailto:info@gcinc.co.za)

14 October 2015

ECO IMPACT  
P O Box 45070  
Claremont  
7735

Attention: Mr Nicolaas Hanekom

E-MAILED  
[admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)

Dear Sirs

## PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING FACILITY (DEA&DP REFERENCE NR: 16/3/3/6/7/1/a5/378/2318/15) AND VARIATION OF AIR EMISSIONS LICENCE (AEL REFERENCE NUMBER: WCCT 022)

We hereby wish to register as an Interested and Affected Party for the proposed expansion of the County Fair Hocraft abattoir and rendering facility.

As an adjacent landowner and developer of the approved and authorised residential development, Greenville Garden City located in close proximity to the County Fair (Portion 16 of Farm No.724, Joostenberg Vlakke). Our concerns regarding the proposed project are listed but are not confined to the below;

- Odours as a result from the abattoir operations
- The potential increase of atmospheric emissions released
- Impact on the development of Greenville housing development and agreements previously deemed with County Fair (Astral Operations Ltd)
- Further impacts on the quality of treated effluent being irrigated on landholding

.../2

ENQUIRIES: Mrs S Majiet  
REFERENCE: GV/P15  
SM/LDT

DIRECTORS: S S STUTTAFORD (CHAIRMAN) P D A BARNFATHER CLOETE V A CHRISTIAN M FEBRUARY (Mrs) P J HEEGER J ISAACS  
T E MAFATLE R A MARSH E R STUTTAFORD M D STUTTAFORD J E WHITE  
CHIEF EXECUTIVE OFFICER : J W MATTHEWS  
COMPANY SECRETARY : K GIBSON



We trust that we will be kept abreast of all developments relating to the proposed expansion of the County Fair facility.

Yours faithfully



GARDEN CITIES NPC (RF)



## SCIENTIFIC SERVICES

**postal** Private Bag X5014 Stellenbosch 7599  
**physical** Assegaaibosch Nature Reserve Jonkershoek  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** Rhett Smart  
**telephone** +27 21 866 8017 **fax** +27 21 866 1523  
**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** SSD14/2/6/1/4/724-16\_abattoir\_Fisantekraal  
**date** 24 November 2015

Eco Impact Legal Consulting  
P.O. Box 45070  
Claremont  
7551

Attention: Nicole Loebenberg  
By email: [admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)

Dear Nicole

**Draft Basic Assessment Report for the Proposed Expansion of the County Fair  
Hocraft Abattoir and Rendering Facility, Portion 16 of Farm 724, Fisantekraal**  
(DEA&DP ref. no. 16/3/3/6/7/1/A5/37/2318/15)

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The application is for the expansion of an existing abattoir and associated poultry processing facilities. The expansion footprint will not encroach into any natural vegetation according to the Biodiversity Network for the City of Cape Town, which is verified through the site description and photographs. The natural vegetation fragments in the surroundings are unlikely to be affected by the proposed expansion, therefore CapeNature is satisfied that the proposed expansion will not result in the loss of important habitat.

There are several wetlands mapped on the property, including three farm dams (other ecological support area) and a natural wetland directly downstream, classified as Critical Ecological Support Area. The wetlands are associated with the headwaters of a minor tributary of the Mosselbank River. The Draft Basic Assessment Report (BAR) indicates that there are no surface water features on or adjacent to the site, which is incorrect (Section B.4). The wetlands are indicated on Cape Farm Mapper, which was used to generate the locality maps.

Although the proposed expansion footprint will not be within the areas mapped as wetlands, the nature of the operations on site have the potential to impact on the wetlands and associated watercourse, particularly with regards to water quality. Polluted run-off from the facility has the potential to result in significant impacts on the freshwater environment.

Any potential impacts on the freshwater environment would be existing due to the existing facility, however an expansion would result in an increase in potential impacts. The impact on water quality and the freshwater environment has not been included in the impact assessment section of the Draft BAR, or addressed elsewhere in the report.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Prof Gavin Maneveldt (Chairperson), Mr Carl Lotter (Vice Chairperson), Mr Mervyn Burton, Prof Francois Hanekom, Dr Bruce McKenzie, Ms Merle McOmbring-Hodges, Adv Mandla Mdludlu, Mr Danie Nel, Prof Aubrey Redlinghuis, Mr Paul Slack

Detailed information is required regarding the existing situation with regards to wastewater and effluent management and the impacts on the freshwater environment. This must include a detailed description of the management of waste and run-off and methodologies in place to prevent pollution of the freshwater environment. Evidence must be provided that there are no significant current impacts e.g. water quality testing. In addition, a description must be provided of how the expansion will be accommodated within the existing measures to prevent impacts on water quality. If this information cannot be provided in the Final BAR, then a freshwater specialist study is required, with a specific focus on water quality and recommendation of relevant mitigation measures.

CapeNature recommends that the above information is provided before this application is assessed further.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rhett Smart', with a horizontal line underneath.

Rhett Smart  
For: Manager (Scientific Services)

**COMMENT PRE-APPLICATION SCOPING PHASE 2018**

<p>Neighbour Garden Cities</p>	<p>25 May 2018</p>	<p><b>ROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING FACILITY</b></p> <p><b>PREVIOUS 2015 NOI DEA&amp;DP REFERENCE NR:</b> <b>16/3/3/6/7/1/A5/37/2318/15</b></p> <p>We acknowledge receipt of your letter dated 16 May 2018 affording us the opportunity to comment and raise any concerns on the proposed expansion of the County Fair hocraft abattoir. We hereby wish to register as an Interested and Affected Party.</p> <p>As landowner and developer of the residential development (Greenville Garden Cities in Fisantekraal) north of the proposed expansion and more prominently the Mosselbank River which runs through the development and wetland conservation area just north-east of the abattoir. We would like to take this opportunity to bring some points of concern to your attention.</p> <p><b><i>(i) Potential runoff/ discharge into the river course</i></b></p> <p>Abattoir wastewater is very harmful to the environment and many studies have proven that these discharges can cause deoxygenation of rivers. If wastewater will be discharged in the Mosselbank River (on Garden Cities property), Garden Cities requests that (A) water quality of the discharges are closely monitored and of sound quality; and (B) monthly water quality test are made available for surrounding land owners which will inform them of the environmental conditions they (and their livestock) are exposed to. Garden Cities' current tenant are also required to conduct water quality tests as per conditions of the General Authorisation. The water tests are required to be within the Department Water and Sanitation parameters – therefor any unlawful activates/ discharges will be potentially questioned.</p> <p>Garden Cities is investing a great deal of time and funds into the rehabilitation of the Mosselbank River and Environmental Education in order to restore ecological functions and create an environment that is</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. The facility treat the effluent on site in accordance to an issued Water Use License and the monitoring is conducted in terms of that. Refer to scoping for more detail. The assessment and management, mitigation and monitoring measurements and actions will be included in the EIR phase.</p> <p>Noted.</p>
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		<p>safe and secure for the surrounding community. We will therefore appreciate effort from County fair in terms of engagement and transparency during this process as they are very much a stakeholder in our programme and have pledged to make efforts to be environmentally conscious.</p> <p>Lastly, should waste water discharge increase, we hope methods are incorporated to reduce the amount of water discharged on receiving waters, especially now during the drought crises.</p> <p><b><i>(ii) Impact on the river course (fauna, flora and people)</i></b></p> <p>Abattoir waste water contains high organic content, organic biological nutrients and suspended solids. If upstream concentrations of these elements are high, it can very much have an impact on the water quality downstream. These impacts on receiving waters consequently create high competition for oxygen within the ecosystem. Consequently, algae increases, aquatic life become stressed and hydrogen sulphide gas is released which creates an unpleasant smell. Additionally the river is used for recreational purposes, therefore the possible health risks to both animals and people living near the abattoir and river vicinity need to be studied/considered.</p> <p><b><i>(iii) Impact on future development and conservation/ sensitive areas</i></b></p> <p>Additionally, there would be an added potential risk for future developments. Both Garden Cities and County Fair need to consider the impacts of the expanded abattoir on the adjacent future developments and the restoration of the depression wetland and terrestrial corridor on the County Fair boarder (picture to right). Both parties must take cognisance of the impact of the animals (at the abattoir) on the development and vice versa, especially regarding the potential health</p>	<p>Please refer to scoping report for more details.</p> <p>Noted. Refer to above.</p> <p>Noted. More detail will be included in the EIR phase and the bordering conservation efforts will be considered in the assessments.</p>
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		<p>risks and spreading of diseases. What measures will be implemented or are already implemented by County Fair to prevent spread of disease to adjacent tenants and animals/livestock?</p> <p><b><i>(iv) Upsizing/ improvement to water treatment facility</i></b></p> <p>With the expansion of the abattoir, the upsizing and/or improvement of the water treatment facility is required in order to handle the excess waste water. We suggest either using (A) Electrocoagulation which is a road-spectrum treatment technology that removes total suspended solids, heavy metals, emulsified oils, bacteria and other contaminants from water or; (B) Sub-surface flow constructed wetland system which is a natural process of removing pollutants in waste water. In essence it's a large gravel and sand-filled basin that is planted with wetland vegetation.</p> <p>Lastly, we acknowledge that with the expansion, additional job opportunities will be made available and we encourage County Fair to us local labour within Fisantekraal to alleviate unemployment in the area. We would appreciate feedback in above regard and trust we are kept abreast of all developments relating to the proposed expansion of the County Fair Hocraft abattoir.</p>	<p>More details on the management measures implemented to prevent spread of disease to adjacent tenants and animals/livestock will be included in the EIR report.</p> <p>Correct. Refer to scoping report for more detail.</p> <p>Noted.</p> <p>Noted.</p>
City of Cape Town TDA Cape Town Pat Titmus	09 May 2019	<p>The abovementioned Scoping Report, dated 17 August 2018 refers.</p> <p>The following technical comment is provided:</p> <p><b>1. TRANSPORT AND DEVELOPMENT AUTHORITY (TDA): development Management Department</b></p> <p>1.1 It must be noted that the zoning references on SDP(1) are incorrect, as they refer to the historic zoning scheme designations of "Agricultural Zone 1" and "Agricultural Zone 2". In terms of the City's Development Management Scheme, both portions are zoned "Agricultural Zone" with the 12.1ha portioned deemed to have a</p>	<p>Noted. Will make the necessary amendments. Please refer to amended SDP.</p>

		<p>consent for Agricultural Industry”.</p> <p>1.2 As per our previous comments, a number of building line departures is required. Prior to submission of a development management application, the applicants are advised to arrange a pre-submission meeting with the final SDP in order to clarify the exact nature and extent of buildings and operations on the western portion, as an application for consent for “agricultural industry” may possibly also be required for this portion.</p> <p><b>2. CITY HEALTH: Environmental Health Department</b></p> <p>2.1 The Department indicated that the recommendations given in 2015 still apply. Please see Annexure A below.</p> <p><b>3. SPECIALISED ENVIRONMENTAL HEALTH; Air Quality Management Branch</b></p> <p>3.1 Application must be made for the authorisation of the installation and operation of fuel burning equipment in terms of Section 11 &amp; 12 of the City of Cape Town Air Quality Management By-Law, no 7662, 17 August 2016, prior to the installation of the new boilers. Any correspondence or enquiries in this regard can be directed to Lumko Vazi at lumko.vazi@capetown.gov.za or telephone 021 590 5200.</p> <p>3.2 In this regard, building plans for the boiler installation must be submitted to Building Development Management for approval. The plans must indicate the chimney position and dimensions relative to the building. Please contact Lumko Vazi at <a href="mailto:lumko.vazi@capetown.gov.za">lumko.vazi@capetown.gov.za</a> or telephone 021 590 5200 for assistance with the chimney height calculation.</p>	<p>Noted. This will be done during the building plan approval and submission stage.</p> <p>Noted. Refer to responses above under 2015 PPP process.</p> <p>Noted. The relevant approvals and authorizations will be sourced before installation. This will also be included in the EMPr to be submitted with the Environmental Impact Report phase.</p> <p>Noted. This will be done during the building plan approval and submission stage.</p>
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		<p>3.3 An application for the variation for the existing Atmospheric Emissions Licence (AEL), in terms of Section 46 of the National Environmental Management Air Quality Act, Act 39 of 2004 as amended, must be submitted on the South African Atmospheric Emission Licence &amp; Inventory Portal (SAAELIP). Please contact Lumko Vazi at <a href="mailto:lumko.vazi@capetown.gov.za">lumko.vazi@capetown.gov.za</a> or telephone 021 591 5200 for any assistance. Please note that whilst this application may be submitted concurrently with the EIA application, the varied AEL may only be finalised once the Environmental Authorisation (EA) has been granted.</p> <p>3.4 Based on the proposed increase in production capacity, Air Quality Management is of the opinion that there will be an increase in emissions from both the facilities. It is noted that the Scoping Report does not adequately address the capacity of the odour abatement equipment. An engineering assessment of the capacity of the system must be undertaken and the findings are to be included in the Final Scoping Report.</p> <p>3.5 Given the encroachment of the Garden City residential development on the northern boundary of the property, an Air Quality/Odour Impact Assessment with Dispersion Modelling must be undertaken to address the possible increase in air quality impacts on the receiving environment. This assessment must be conducted in accordance with the Dispersion Modelling Regulations, Regulation No. R533 of 11 July 2014.</p> <p>3.6 A Fugitive Emissions and Odour Management plan must be formulated for the facility and be included in the Environmental Management Plan (EMP).</p>	<p>Noted. Application will be lodged on the South African Atmospheric Emission Licence &amp; Inventory Portal (SAAELIP) system together with the Waste License application and Environmental Authorization Applications.</p> <p>Noted. An Air Quality/Odour Impact Assessment with Dispersion Modelling specialist study will be conducted during the Environmental Impact Assessment (EIR) Phase and the details required will be included in the EIR phase reports.</p> <p>Noted. An Air Quality/Odour Impact Assessment with Dispersion Modelling specialist study will be conducted during the Environmental Impact Assessment (EIR) Phase and the details required will be included in the EIR phase reports.</p> <p>Noted. This will be included in the EMP to be sent for comment during the EIR phase with management and mitigation</p>
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		<p>measures obtained from the specialist report.</p> <p>3.7 No dust nuisance is to be created during the construction phase and provision I to be made for the implementation of dust mitigation measures.</p> <p>3.8 Activities during the construction phase must comply with the provisions set out in section 26 (Dust emissions) of the City of Cape Town: Air Quality Management By-law 2016, dated 17 August 2016.</p> <p>3.9 Should any cement silos be employed on site, the silos are to be fitted with appropriate dust control systems for emissions abatement during bulk materials loading and transfer operations.</p> <p>3.10 The City of Cape Town's Head: Specialised Environmental Health Services / Air Quality Officer reserve the right to call for amendments to the Dust fall Monitoring, should the need arise.</p> <p><b>4. SPECIALISED ENVIRONMENTAL HEALTH: Mechanical Engineering – Noise Division</b></p> <p>4.1 The application was assessed in terms of Western Cape Noise Control Regulations PN 200 of 2013 (see below extract) and SANS 10103:2008 – The measurement and rating of environmental noise with respect of annoyance and to speech communication.</p> <p>4.2 The Mechanical Engineering: Noise Division reserves the right to call for a Noise Impact Assessment of Noise Management Plan should any complaints be received.</p> <p>4.3 The Noise Control department has no objection provided that any noise emissions from activities during the operations, comply with</p>	<p>Noted. Dust management and mitigation will be included in the EMPr.</p> <p>Noted. Requirements will be included in the EMPr.</p> <p>Noted. No silos will be employed on site.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Requirements will be included in the EMPr.</p>
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	<p>the Noise Control Regulations PN200/13 in that:</p> <p>a. The SANS 10103 table 2 – typical rating levels for noise in districts are adhered to.</p> <p>b. No Noise Disturbance is caused in terms of the Provincial Noise Control Regulation N200/13.</p> <p>c. No Noise Nuisance is caused in terms of the Provincial Noise Control Regulation PN 200/13.</p> <p><b>WATER AND SANITATION: Water Demand Management &amp; Planning Branch</b></p> <p><b>Table 1.1: Estimated water and sewer demands provided by you</b></p> <table><tr><th rowspan="2">Zoning</th><th>ERF</th><th>AADD</th><th colspan="2">Design flows</th><th>ADWF</th><th colspan="2">Design flows</th></tr><tr><th>Units</th><th>Qty (l/d)</th><th>Kl/day</th><th>Peak flow (l/s)</th><th>Qty**</th><th>Kl/day</th><th>Peak Flow (l/s)</th></tr><tr><td></td><td></td><td></td><td></td><td>PF = 4</td><td></td><td></td><td>PF = 2.5</td></tr><tr><td>Agricultural</td><td>N/A</td><td>No info</td><td>No info</td><td>No info</td><td>4400000</td><td>4400</td><td>127</td></tr></table> <p><b>** based on a 100% sewer flow design criterion</b></p> <p><u>Water</u></p> <p>5.1 The information provided is vague. More Information of the current and proposed potable water demand is required to provide a detailed comment.</p> <p>5.2 Under drought conditions there is expected to be aggressive pressure management that could result in pressure drops. The developer is required to take this into account.</p>	Zoning	ERF	AADD	Design flows		ADWF	Design flows		Units	Qty (l/d)	Kl/day	Peak flow (l/s)	Qty**	Kl/day	Peak Flow (l/s)					PF = 4			PF = 2.5	Agricultural	N/A	No info	No info	No info	4400000	4400	127	<p>Noted. A services report compiled by an engineer that details all services, including water usage and requirements will be included in the EIR.</p> <p>Noted.</p>
Zoning	ERF		AADD	Design flows		ADWF	Design flows																										
	Units	Qty (l/d)	Kl/day	Peak flow (l/s)	Qty**	Kl/day	Peak Flow (l/s)																										
				PF = 4			PF = 2.5																										
Agricultural	N/A	No info	No info	No info	4400000	4400	127																										

		<p>5.3 The developer is expected to incorporate water demand management measures into the development.</p> <p><u>Bulk Water</u></p> <p>5.4 No Bulk water pipelines or infrastructures under the control of the Bulk water Branch are directly affected by the proposed residential development.</p> <p>5.5 This comment may be revised upon receiving comment from the Bulk Water Branch.</p> <p><u>Sewer</u></p> <p>5.6 Sewage effluent will be treated at the upgraded WWTW on site.</p> <p>5.7 From the scoping report, the expected wastewater flow is 4.4 MI/day, and according to the scoping report the WWTW was originally designed to handle a hydraulic load of 5.5 MI/day.</p> <p>5.8 It is questioned whether the treated effluent produced at the on-site wastewater treatment plan will be reused on site.</p> <p>5.9 No sludge will be allowed into the sewer system, all sludge produced must be transported to a landfill site for disposal.</p>	<p>Noted. Water demand management and reuse of water is incorporated into the development.</p> <p>Noted. Correct.</p> <p>Noted.</p> <p>Correct.</p> <p>Correct.</p> <p>The treated effluent is irrigated on site. Some of the water is treated on site with a reverse osmoses process and reused on site. More detail will be provided in the services report.</p> <p>Correct. Sludge is currently and will continue to be transported to registered and authorized waste management facility.</p>
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		<p><u>Wastewater</u></p> <p>5.10 Sewage and effluent will be treated at the upgraded WWTW on site.</p> <p><u>Water Pollution Control</u></p> <p>5.11 The developer will be required to meet with the water pollution control. The developer must conform to all bylaws related to industrial effluent and there will be a need to have an agreement in place with the city on the quality and volume of effluent discharge to the stormwater or sewer system.</p> <p><u>Conclusion</u></p> <p>5.12 Sufficient water demand information has not been provided. The sludge produced is to be disposed of at a landfill site. Clarity is required on whether the Treated effluent produced at the WWTW will be reused on the property.</p> <p><u>General/Disclaimer</u></p> <p>Information provided is based on best available data. The flows and pressures provided in this comment are theoretical and not measured. All diameters, levels, dimensions and positions of existing infrastructure provided need to be checked on site.</p> <p><b>6. WATER AND SANITATION: Stormwater and Catchment Planning Branch</b></p> <p>6.1. The Scoping report seeks to address the management of stormwater and surface flow by the introduction of a new additional forebay structure and bio-retention pond and routing of all stormwater to the new wet attenuation pond above the existing informal dam via an open channel. However, no mention is made of how untreated</p>	<p>Correct.</p> <p>Noted. Please take note that the development will not discharge any effluent or stormwater into the municipal systems and networks.</p> <p>Noted. Refer to responses above.</p> <p>Correct.</p> <p>The untreated effluent spillages</p>
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		<p>effluent spillages and associated emergency clean-up procedures will be managed / addressed. This Department's previous 2015 comment on the previous DBAR specifically requested clarity on this issue.</p> <p>6.2 Provide details of the proposed open channel leading from the proposed new bio-retention pond to the proposed new wet attenuation pond, indicating if this is to be permeable, e.g. Armourflex or impermeable, e.g. concrete lined?</p> <p>6.3. Provide clarity on the existing effluent treatment facility's capacity to treat current and proposed future extensions, volumes of effluent. Furthermore, the oversaturation of the ground has led to surface water run-off discharging directly to the tributary feeding into the Mosselbank River. Thus, the effluent treatment facility has to be increased in order to limit the release of treated wastewater into the Mosselbank River during summer and winter months to reduce the likelihood and extent of eutrophication within the river and its effects such as localised development of anoxic pools.</p> <p>6.4. It is noted that stormwater rooftop runoff for the broiler camps will be contained in the open areas between the broiler houses. Details on how this water will be attenuated and treated, what the storage volumes are and the attenuation capacity needs to be provided. Furthermore, where this "treated stormwater" will be discharged and how will surface runoff be accommodated within the catchment is to be provided.</p> <p>6.5. The "Buffer" times and volumes available to accommodate electricity outages, as previously requested is to be provided.</p>	<p>and associated emergency clean-up procedures will be managed in terms of the updated EMPr.</p> <p>Noted. More detail will be provided in the Stormwater management plan. Please take note that this is a stormwater channel and not a effluent handling channel.</p> <p>The detail on the effluent treatment plant and its capacity and expansions proposed was included in the scoping report. This will again be included in the EIR as well as a soil analyses of the irrigation areas will be included in the report.</p> <p>The stormwater associated with the broiler houses management and details were included in the stormwater management plan.</p> <p>Noted. Will be included in the EIR. The buffer times on effluent treatment is 24 hours as per the systems design.</p>
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		<p>6.6. It is noted that the effluent is to be recycled and reused to reduce water consumption and the release of treated effluent into the environment. The current and proposed volumes of treated effluent discharge into the Mosselbank river are to be provided. Discharge into Mosselbank River must be avoided at all cost, as new housing developments are found downstream of County Fair's precinct, straddling the Mosselbank River. County fair must engage with neighbouring farm owners and establish a "Water Scheme Supply Agreement" and develop appropriate irrigation infrastructure, to minimise the treated effluent discharge of discharge volumes into the Mosselbank River.</p> <p>6.7. It is noted that the Department of Water &amp; Sanitation communication (dated: 03 November 2015) indicates that a Water Use License is not triggered, conditions apply.</p> <p>6.7.1. This Department cannot agree, previous correspondence noted the treatment of effluent on site and the discharge or use of said effluent for irrigation as well as discharge to the Mosselbank River.</p> <p>6.7.2. Further, the last point under item 7.1 (Water Use Authorisation Application – Scoping Report, Pg. 39 of 50) notes that the DWS will amend the <u>existing License</u>.</p> <p>6.7.3. This Department therefore reiterates its previous comment that the City would like to have a copy of the Department of Water &amp; Sanitation approved Water Use License, which confirms the discharge quantity (m<sup>3</sup>) allowed during the winter and summer months respectively and the volumes of effluent used onsite.</p> <p>6.8. There are substantial amounts of outstanding stormwater issues (listed below) which were part of previous Department of</p>	<p>Correct.</p> <p>Correct. This is in terms of the authorized Water Use License for the facility. A Water Scheme Supply Agreement is already in place between the facility and Groenvlei Grass as authorized in the Water Use License for the facility.</p> <p>Correct. There is an existing authorized Water Use License.</p> <p>The effluent discharge and irrigation is already licensed.</p> <p>Correct.</p> <p>A copy of the Water Use License will be included in the EMPr during EIR phase.</p> <p>All the stormwater issues was captured and included in the</p>
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		<p>Environmental Affairs and Development Planning, Department of Water &amp; Sanitation as well as City's Stormwater By-law transgression directives on this property. These outstanding stormwater issues, listed below, must be included into this EIA process.</p> <p>6.8.1. Stormwater overland (sheet flow) runoff calculations for the entire County Fair Hocraft abattoir precinct/farm and associated stormwater attenuation facilities.</p> <p>6.8.2. New stormwater dam's civil engineering design drawings</p> <p>6.8.3. stormwater pond design</p> <p>6.8.4. inlet &amp; outlet structures</p> <p>6.8.5. forebay and stilling basin</p> <p>6.8.6. emergency overflow structures</p> <p>6.8.7. erosion protection</p> <p>6.8.8. Overland flow routes</p> <p>6.8.9. The written agreement between Garden cities tenant (Groenvlei Gras) and County Fair, concerning the treated effluent water transfer and usage.</p> <p>6.8.10. Treated effluent discharge volumes to Groenvlei Gas/Garden cities during winter and summer months respectively, must be quantified.</p> <p>6.9. A Holistic Stormwater Management Plan (H-SWMP) must be compiled and submitted to this office for approval, for the entire Country Fair Hocraft abattoir and rendering facility/precinct/farm situated on portion of farm Jumbo no. 724, Kraaifontein. This H-SWMP must indicate impacts of the proposed current and future operations activities on stormwater runoff management on/from this site as well as surrounding erven; furthermore, this H-SWMP must address the following issues (providing supporting calculations):</p> <p>6.9.1. The City's "Design Rainfall Depth Grid" data which included 15%</p>	<p>Stormwater Management Plan which will be included in the EMPr during the EIR phase.</p> <p>Noted. Refer to responses above.</p> <p>Noted. This was done and will be included in the EMPr during the EIR phase for comment.</p>
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		<p>for Climate Change (obtainable from this office) must be used for all stormwater runoff, attenuation and treatment calculations.</p> <p>6.9.2. Identify the holistic catchment area and sub-catchment areas and state how stormwater will be management with regard to quality and quantity per sub-catchment.</p> <p>6.9.3. Protect stability of downstream channels by 24 hour extended detention of the 1 year RI, 24 hour storm event.</p> <p>6.9.4. Protect downstream properties rom fairly frequent nuisance flood by reducing he peak flow to pre-development levels for all events p to the 10 year RI peak flow.</p> <p>6.9.5. Protect floodplain developments and floodplains from adverse impacts of extreme floods by reducing the peak flow to existing development levels for all events up to the 50year RI peak flow.</p> <p>6.9.6. Elaborate on stormwater runoff treatment/quality improvement as stipulated in the Management of Urban Stormwater Impacts Policy, approved by Council 27 May 2009. The design storm event for water quality treatment is the ½ year RI, 24 hour storm, and pollution removal targets are 805 reduction in suspended solids and 45% reduction in total phosphorous.</p> <p>6.9.7. Management of overland stormwateer run-off from this erf/farm (farm Jumbo no. 724) and surrounding properties, especially upstream properties.</p> <p>6.9.8. Identification an accommodation of stormwater overland escape routes for floods greater than the 1:50 year storm event for the mining site.</p> <p>6.9.9. Expansion of the existing effluent treatment facility to treat current and proposed abattoir and rendering facility untreated effluent discharge.</p> <p>6.9.10. Design of attenuation facilities for effluent discharge (Treated or untreated) from the current and proposed abattoir and rendering facility extensions.</p> <p>6.9.11. Elaborate on implementation off Best (Stormwater)</p>	
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		<p>Management Practices (BMP) on this development precinct, to reduce stormwater runoff i.e. reuse of water in the abattoir facilities, water features, rain gardens, vegetate bio-swales, infiltration planters, irrigation etc.</p> <p>6.10. Management of county Fair Hocraft abattoir and rendering facility must attach the following to the SWMP as an annexure:</p> <p>6.10.1. Department of Water &amp; Sanitation, approved Water Use Licence</p> <p>6.10.2. Irrigation agreement, between County Fair and neighbour, Julian Visser from Groenvlei Gas/Garden Cities.</p> <p>6.11. Reference is made to the EMP within the Scoping report; however the EMP was not included with the documentation provided. The EMP must address the following:</p> <p>6.11.1. The protection of the Environment from construction works on site, e.g. mixing of concrete, erosion, and pollution from hydrocarbon sources.</p> <p>6.11.2. Indicate bunded refuelling stations on site and elaborates on emergency procedures during hydraulic oil or diesel spillage event etc. bunded areas must be able to accommodate 110% of the fuel contained in case of spillage/ruptures etc.</p> <p>6.12. In addition, if any of the steps required above will require further authorisation from any organ of state, such authorisation (s) must be obtained and be brought to this office's attention (e.g. Water Use License, Environmental Authorisation, general Authorisation or renewal/amendment etc.)</p> <p><b>7. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Environmental Management Department</b></p> <p><u>DSR</u></p>	<p>Noted. Will be included together with Stormwater Management plan in EMPr during EIR phase and send for comment.</p> <p>Correct. EMPr will be included in the EIR phase documents for comment.</p> <p>Noted.</p> <p>Noted. All authorizations that will be applied for will form part of the EIR phase and bring to the attention of the CoCT for comment.</p>
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	<p>7.1 The covering letter (dated 17 August 2018) which was attached to the report indicates it as the Draft Scoping Report, however throughout the document as the footer note; it is referred to as a Final Scoping Report. This is to be corrected.</p> <p>7.2 The hard copy of the DSR is printed in black and white which makes the assessment of graph, maps and aerial photographs difficult. This is to be corrected.</p> <p>7.3 It is noted that the proposed expansion will only occur within the current rendering facility area which is on the eastern corner of Portion 16 of farm 724. Throughout the report the terms “study area”, “site” and “property” are used, which either refers to the whole farm, the proposed expansion site or a specific area. This leads to confusion when assessing where specifically the proposed activities are to occur. These terms are to be clearly defined.</p> <p>7.4 Figure 8 on Page 27 does not clearly indicate the site. Kindly note the report states see Figure 1 for biodiversity overlay but it is actually figure 8.</p> <p>The following inconsistencies identified below are to be addressed and/or corrected:</p> <p>7.5 Page 7-8 under Section 1.1 Application for environmental authorization and proposed project description indicates a propose new gravel road listed in the list of activities however this is not indicated on the list of activities legend on the Site Development Plan drawing (SDP Primary Processing Plan, Drawing No: 718-S-001, dated 10 May 2018) as compiled by MPRO Consulting Engineers.</p> <p>7.6 The proposed new turning area (number 22) on the Site Development Plan (SDP Primary Processing Plan, Drawing No: 718-S-001, dated 10 May 2018 as compiled by MPRO Consulting Engineers)</p>	<p>Noted. Corrections were made. Refer to attached.</p> <p>Noted. Colour copies will be sent for comment.</p> <p>Noted. The property details must be provided. However, the SDP and the location of the expansions are clearly indicated in order to determine where expansions on the property is intended. This will be described in more detail in the EIR.</p> <p>Noted. Amendments were made. Refer to amended Scoping report.</p> <p>The Site Development Plan does indicate the gravel road. There is no new or other roads other than what is indicated on the SDP that will be constructed.</p> <p>Noted. Amendments were made. Refer to amended Scoping report.</p>
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		<p>indicates that it will be built over a section of the existing sludge pools. There is however no discussion within the Scoping report on how this will be done or if a road can be built over a sludge pool. There is also no indication on the drawing of a buffer zone between the remaining sludge ponds and proposed new turning area access road.</p> <p>7.7 The following statements are noted on page 11 under Section Effluent Treatment from Abattoir and Rendering facility: “The existing WWTW can be upgraded to comply with future treatment capacity without the requirement for additional major civils or earthworks Construction” and “The Wastewater flow would then increase to an estimated 4,400 m<sup>3</sup>/day and at same pollution concentration as the current situation”. If the current WWTW can be upgraded to handle the expected waste water flow from the proposed abattoir and rendering facility, the need for a new WWTW facility (new effluent treatment plant) as indicated on the Site Development Plan (Drawing No: 718-S-001, SDP Primary Processing Plan, dated 10 May 2018 by MPRO Consulting Engineers) is questioned.</p> <p>7.8 Page 15 under Section Stormwater Management Plan “in order to achieve the attenuation for the abattoir site, it is intended to create a wet attenuation pond just above the existing informal dam below the northern waste water treatment ponds”. Does the new wet attenuation pond being proposed mean formalizing the current informal pond? If so, the process of formalizing of the pond is to be provided.</p> <p>7.9 Page 24 under section 2.3.1. Biophysical Elements states that “The proposed expansions and associated infrastructures, such as the stormwater management structures will not impact on any critical Biodiversity or Ecological Support Areas.” This is incorrect as the Site Layout Plan (Drawing No: 718-S-002, Rev 2, dated 11 May 2018 by MPRO Consulting Engineers) indicates “new attenuation wet pond” an “new</p>	<p>Noted. Amendments were made. Refer to amended Scoping report.</p> <p>Statement is correct. No mayor earthworks are required. The site development plan indicates the upgrades needed to the existing infrastructure is proposed to improve the treated water quality.</p> <p>Yes, the current pond will be upgraded. The upgraded pond design to improve stormwater management is included in the Stormwater management plan and the details will also be described under the activity description in the EIR report.</p> <p>Comment noted. Noted. Biodiversity Map information will be amended. Refer to amended scoping report.</p>
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	<p>formalized spillway” to occur in areas identified on the city’s Biodiversity Networks (see extract below).</p> <p><u>Comments and Responses Report</u></p> <p>7.10 The responses in the Comments and Responses refer to amended BAR”. This is incorrect as the current report is the Draft Scoping Report. Furthermore, the amendments have not been done as indicated and therefore cannot be further assessed.</p> <p>7.11 The Water Use Licence indicated on page 18 is to be provided.</p> <p><u>Specialist studies</u></p> <p>7.12 A Freshwater Impact Assessment is to be conducted to assess the additional facilities proposed and its affect it will have on the Mosselbank River. The aspects of water quality and river health of effluent overflows in the Mosselbank River are also to be assessed.</p> <p>7.13 No contingency plan should any failures of the effluent treatment facility is experienced has been provided. This needs to be addressed.</p> <p><u>Environmental Management Plan (EMP)</u></p> <p>The EMP is to address the following:</p> <p>7.14 The methodology of how the effluent is to be recycled and reused</p> <p>7.15 Waste Management and disposal (of all waste generated on site)</p> <p><b>CONCLUSION</b></p> <p>The above comments and requirements raised by the City of Cape Town</p>	<p>Noted. Please refer to amended draft scoping report.</p> <p>Noted. Will be included in the EIR.</p> <p>Noted. Freshwater Impact Assessment Report will include these ToR.</p> <p>Contingency plan will be included in the EMPr in EIR phase.</p> <p>Noted. Will be included in EMPr.</p> <p>An Integrated Waste Management Plan will be included in the EMPr.</p>
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	<p>are to be addressed in the 2<sup>nd</sup> Draft of the Scoping Report.</p> <p><b><u>ANNEXURE A</u></b></p> <ol style="list-style-type: none"> <li>1. The applicant must comply with the City of Cape Town's Environmental Health By-Law. No. 13333 of June 2003. Part 1, (Prevention and Suppression of Health Nuisances).</li> <li>2. Building plans must be submitted for new buildings and for any alterations to the existing building.</li> <li>3. Facilities must be provided for persons with disabilities in accordance with SANS 10400-5: 2011 Edition 3. This includes ramps/walkways, toilet facilities and removal of obstructions in the path of travel of disabled persons.</li> <li>4. Adequate toilet facilities must be provided in accordance with SANS 0400 of 1990 (Table 6).</li> <li>5. The premises must comply with the Western Cape Noise Control Regulation P.N. 200/2013 by not creating a disturbing noise or noise nuisance to surrounding property owners. Any noise producing plant or equipment must be adequately muffled.</li> <li>6. The premises must comply with the Tobacco Product Control Act (Act No. 83 of 1993 as amended).</li> <li>7. The premises must be made rodent proofed in accordance to the Government Rodent Proofing Regulations.</li> <li>8. All refuse must be stored in such a manner so as to not create a health nuisance pending removal.</li> </ol>	<p>Noted. Refer to responses above as well as amended draft scoping report.</p> <p>Noted. Will be included in EMPr.</p> <p>Noted. Building plans will be submitted before construction.</p> <p>Noted. Detail will be included in building plans submitted for approval.</p> <p>Noted. Detail will be included in building plans submitted for approval.</p> <p>Noted. This will be included in the EMPr.</p> <p>Noted. This will be included in the EMPr.</p> <p>Noted. Detail will be included in building plans submitted for approval.</p> <p>Noted. Refuse will be stored and management as indicated in the</p>
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DEA&DP: DIRECTORATE: WASTE MANAGEMENT ONGEZIWE NDLETYANA	29/08/2018	<p>The above-mentioned documentation received by the Department of Environmental Affairs and Development Planning, Directorate: Waste Management (hereafter 'the Department'), dated 17 August 2018, as received by the Department on 17 August 2018, refers.</p> <p>2. This letter serves as an acknowledgment of receipt of the aforementioned document by the Directorate: Waste Management.</p> <p>3. The Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.</p>	<p>Noted.</p> <p>Noted.</p>
	17/09/2018	<p>1. The above-mentioned documentation dated 17 August 2018, as</p>	<p>Noted.</p>

		<p>received by the Department of Environmental Affairs and Development Planning, Directorate: Waste Management (hereafter 'the Department'), on the same day, refers.</p> <p>2. Kindly clarify if the document is a pre-application, draft, or a final Scoping Report, as there are contradictions through the report (bottom of page, first page, and page 36 (subsection 5.5)).</p> <p>3. The Department request that you insert a clear picture in colour for the site notice in Appendix F, to be able to note which listed activities triggered were included on the notice.</p> <p>4. Where will the effluent resulting from drying the sludge be send to?</p> <p>5. When did rendering commence at the Facility? What quantities of general and hazardous waste are rendered, and had the throughput increased since commencement?</p> <p>6. Should the Facility intend to apply the following listed activities in National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), Government Notice No. 921 of 29 November 2013, "<i>List of waste management activities that have, or are likely to have, a detrimental effect on the environment</i>" listed activities Category A 3 (7) or B 4 (6), the application must be lodged with the National Department of Environmental Affairs.</p> <p>7. The Department reserves the right to revise its initial comments and request further information from you based on any new or revised</p>	<p>Noted. The amended scoping report will be draft scoping report. The changes were made. Please find attached.</p> <p>I clear colour picture as well as a close-up of the site notice and information is included in this PPP report. Refer to images and information above in this report.</p> <p>No drying beds. The sludge that build up is removed from time to time if required and will be disposed off at Vissershok Landfill Site.</p> <p>The date of commencement and waste volumes is included in the Waste License Application form. Please refer to attached application. The process and volumes did not change over the years.</p> <p>Noted. Refer to Waste Management License Application that will be submitted to DEA.</p> <p>Noted.</p>
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		information received.	
DIRECTORATE: DEVELOPMENT MANAGEMENT REGION 1 Ayesha Hamdulay	17/09/2018	<p>1. The pre-application Scoping Report with cover letter dated 17 August 2018, received by this Department on the same date. refer.</p> <p>2. This department notes that the existing abattoir and rendering facility on a Portion of the Farm Jumbo No. 724. Kraaifontein will be expanded by approximately 2. 1ha on land zoned Agricultural Zone 2.</p> <p>3. Listed Activities</p> <p>After considering the information provided in the Scoping Report, this Department notes that the proposed development constitutes the following listed activities as defined in terms of the EIA Regulations, 2014 (as amended)):</p> <p><b>Item 19 of GN No. R983 (as amended):</b>  <i>"The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse: but excluding where such infilling, depositing, dredging, excavation, removal or moving-</i>  <i>(a) will occur behind a development setback;</i>  <i>(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;</i>  <i>(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;</i>  <i>(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or</i>  <i>(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 20 14 applies."</i></p> <p><b>Item 34 of GN No R.983 (as amended):</b>  <i>"The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution, excluding-</i>  <i>(i) where the facility, infrastructure, process or activity is included in the</i></p>	<p>Noted.</p> <p>Correct.</p> <p>Noted.</p> <p>Correct. Will be included in EA application form.</p> <p>Correct. Will be included in EA application form.</p>





	<p>c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse: excluding-</p> <p>(aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour:</p> <p>bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 20 14 applies:</p> <p>cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 20 14, in which case that activity applies:</p> <p>dd) where such expansion occurs within an urban area: or</p> <p>ee) where such expansion occurs within existing roads, road reserves or railway line reserves."</p> <p>4. Process</p> <p>A Basic Assessment ("BA") Process 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 BA Process. Failure to include any applicable listed activity may invalidate the application. You are referred to Appendix I of GN No. R. 982 (as amended) for the requirements with respect to the 'contents of a basic assessment report'. You are advised that when undertaking the BA Process you must take into account this Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended) as well as any other guidance provided by this Department. This Department's guidelines can be downloaded from the Department's website: <a href="http://www.westerncape.gov.za/eadp">www.westerncape.gov.za/eadp</a>. In particular, the guidelines that may be applicable to the proposed development include, <i>inter alia</i>, the following:</p> <p>1.1. Guideline for Environmental Management Plans (June 2005)</p> <p>1.2. Guideline on Exemption Applications (March 2013)</p>	<p>Noted. However, a scoping report must be followed in terms of the Waste Management Licensing process. A deviation of the process from following a BA process to following the Scoping EIR phase will be applied for in the EA application process due to the fact that a Scoping EIR phase process must be followed for the Waste Management License Application.</p> <p>The following guidelines will be included and reported on in the EIR</p>
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	<p>1.3. Guideline on Public Participation (March 2013)</p> <p>1.4. Guideline on Alternatives (March 2013)</p> <p>1.5. Guideline on Need and Desirability (March 2013)</p> <p>5. Request for a Specific Fee Reference</p> <p>This Department reminds you that the "Request for a specific fee reference number" form must be completed and submitted to this Department prior to submission of the formal application for the abovementioned proposed development. This Department advises that the Request for a Specific Fee Reference Number Form be submitted to this Department approximately 30 days before the intended date for the submission of the Application Form for Environmental Authorization. Upon receipt of the specific fee reference number. The reference number must be inserted into the Application Form for Environmental Authorization and proof of payment of the applicable fee attached when the Application Form is submitted to this Department.</p> <p>6. Alternatives</p> <p>Be advised that <b>in</b> terms of the EIA Regulations. 2014 (as amended) and the NEMA. The investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. <b>In</b> this regard it must be noted that this Department may grant authorization for an alternative as if it has been applied for or may grant authorization in respect of all or part of the activity applied for as specified <b>in</b> Regulation 20 of GN No. R. 982 (as amended). 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.e. 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</p>	<p>report.</p> <p>Noted. Will be included in the EA application form.</p> <p>Noted. Alternatives will be reported on and assesses in the EIR phase.</p> <p>Noted.</p>
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		<p>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 proof that the investigation was undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the 'No-Go' option exist.</p> <p>7. Public Participation Process</p> <p>A Public Participation Process ("PPP") that meets the requirements of Regulation <b>41</b> of the EIA Regulations, 2014 (as amended) 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 ("EAP") discretion whether to meet the requirements of Regulation 41 during the 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 Basic Assessment Report ("BAR").</p> <p>8. In terms of Section 240 (2) and (3) of NEMA and Regulations 7(2) and 4312) of the EIA Regulations, 2014 as amended), 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 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 13) of NEMA in the pre-application BAR, where appropriate. It is noted that, amongst others, the following State Departments and Organs of State must be consulted during the EIA process as part of the PPP:</p> <p>8.1. CapeNature;</p> <p>8.2. Heritage Western Cape;</p> <p>8.3. The City of Cape Town;</p> <p>8.4. The Western Cape Government; Health;</p> <p>8.5. The Western Cape Government: Agriculture;</p> <p>8.6. The Western Cape Government: Transport and Public Works;</p>	<p>Noted. Full details of PPP will be recorded in this PPP report. The PPP followed before application was submitted meet the requirements of regulation 41.</p> <p>Noted. Please take note that it would be a scoping and EIR documents.</p> <p>Noted. Refer to comments and response report for proof as well as comments received.</p> <p>Noted. Refer to this comments and response report for proof. Correct.</p>
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		<p>8.7. DEA&amp;DP: Pollution and Chemicals Management;  8.8. DEA&amp;DP: Waste Management;  8.9. The National Department of Water and Sanitation; and  8. 10. The National Department of Agriculture, Forestry and Fisheries.</p> <p>In terms of good environmental practice 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 pre-application BAR available to State Departments as stipulated above.</p> <p>The person conducting the PPP must fulfil the requirements outlined in Chapter 6 of the EIA Regulations. 2014 (as amended) and must take into account any applicable Guidelines published in terms of Section 24J of the NEMA. this Department's Circular EADP 0028/2014 on the "<i>One Environmental Management System</i>" and the EIA Regulations 2014 (as amended), as well as any other guidance provided by this Department, Note that the public participation requirements are applicable to all proposed alternatives,</p> <p>9, Environmental Management Programme</p> <p>In accordance with Section 24N of the NEMA and Regulation 19, this Department hereby requires the submission of an EMPr, The contents of such an EMPr must meet the requirements outlined in Section 24N of the NEMA (as amended) and Regulation 19 of the EIA Regulations, 2014 (as amended), The EMPr 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 EMPr must be submitted together with the pre-application BAR. This Department would like to advise that in compiling the EMPr, this Department's Guideline for Environmental Management Plans (June 2005), available on this Department's website must be taken into account as well as Appendix 4 of the EIA Regulations, 2014 (as amended).</p> <p>10. Need and Desirability</p>	<p>Noted. This practise was followed.</p> <p>Noted. Guidelines were taken in consideration.</p> <p>Noted. This will form part of the EIR phase.</p>
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		<p>In terms of the EIA Regulations, 2014 (as amended) when considering an application, this Department must take into account a number of specific considerations including, <i>inter alia</i>, the need for and desirability of any development proposal. As such, the need for and desirability of the development proposal must be considered and reported on in the pre-application BAR. The pre-application 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,</p> <p>11, This Department awaits the submission of the Application Form and/or pre-application BAR prescribed by the EIA Regulations, 2014 (as amended), Please note that two printed copies and one electronic copy (saved on CD/DVD) of the Application Form for Environmental Authorisation and/or pre-application BAR must be submitted.</p> <p>12, 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 this Department. No information provided, views expressed and/or comments made by officials during the preapplication consultation should in any way be seen as an indication or confirmation:</p> <p>12.1, That additional information or documents will not be requested, or</p> <p>12.2, Of the outcome of the application.</p> <p>13, 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 must also show how the proposed development meets the requirements of Sustainable Development,</p> <p>14. It is prohibited in terms of Section 24F 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 in terms of the prohibition will result in the matter being referred to the Environmental Law Enforcement Directorate of this Department for possible prosecution. A person convicted of an offence in terms of the above is liable for a fine not exceeding R5 000 000 or to imprisonment for a period not exceeding 10</p>	<p>Noted. This will form part of the EIR phase.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. This will form part of the EIR phase.</p> <p>Noted.</p>
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		<p>years, or to both such fine and imprisonment.</p> <p>15. Kindly quote the abovementioned reference number in any future correspondence regarding this letter.</p> <p>16. The Department reserves the right to revise or withdraw its comments and request further information from you based on any information received.</p>	<p>Noted.</p> <p>Noted.</p>
<p>CapeNature Rhett Smart</p>	<p>27/09/2018</p>	<p>CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.</p> <p>The application is for the expansion of an existing abattoir and associated poultry processing facilities. There was a previous application for this proposal which was within a Basic Assessment process. CapeNature's comments on the previous process have not been included within the comments and response report, however they remain relevant to this application. It is also noted that the Scoping Report aims to address various authorisations, including the amendment to the water use license, and is hence aligned to the operational agreement for synchronisation of authorisations, which is supported by CapeNature.</p> <p>The expansion footprint will not encroach into any natural vegetation according to the Biodiversity Network for the City of Cape Town and the Western Cape Biodiversity Spatial Plan, which is verified through the site description and photographs. The natural vegetation fragments in the surroundings are unlikely to be affected by the proposed expansion, therefore CapeNature is satisfied that the proposed expansion will not result in the loss of terrestrial habitat of significant value.</p> <p>There are several wetlands mapped on the property, including three farm dams (Other Ecological Support Area (ESA)) within the vicinity of the abattoir and a natural wetland directly downstream, classified as Critical ESA. The wetlands are associated with the headwaters of a minor tributary of the Mosselbank River. The Mosselbank River is located along the western boundary of the property with associated wetlands. The site</p>	<p>Noted.</p> <p>Correct.</p> <p>Apologies. These comments were included. Refer to responses above.</p> <p>Correct.</p> <p>Correct. Reported as such in scoping report.</p>

		<p>description has included a description of the watercourse and wetlands in the vicinity of the abattoir.</p> <p>CapeNature indicated concern regarding the impact of the facility on the freshwater features both on site and downstream in our previous comments. The proposed stormwater management plan has been described in the Scoping Report and it is evident that upgrades to both the existing wastewater treatment system and the stormwater drainage are proposed. It should be noted that this concern also relates to the other authorisations required for the application, and we further wish to emphasize that this does also relate to biodiversity in terms of freshwater ecology. It is noted that ecological specialist input is proposed, which must specifically assess the impacts on freshwater ecology, including the Mosselbank River and associated wetlands downstream of the facility.</p> <p>In conclusion, CapeNature will comment further on the application in the EIA Phase. It must be ensured that impacts on freshwater ecology are adequately assessed, preferably with a freshwater specialist study. The full stormwater management plan must be included as an appendix. Information which is required to address impacts related to freshwater for other applications (e.g. water use license amendment) must be included within the NEMA process, as this is likely to address the same concerns.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>Noted.</p> <p>Correct. Will be included in EIR.</p> <p>Noted.</p> <p>Noted.</p>
Western Cape Government Department of Agriculture Landuse Management Cor van der Walt	15/10/2018	<p>Your application of 17 August 2018 has reference.</p> <p>The Western Cape Department of Agriculture has no comment.</p> <p>Please note:</p> <ul style="list-style-type: none"> <li>• Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.</li> <li>• The Department reserves the right to revise initial comments and request further information based on the information received.</li> </ul>	Noted. No response.



**CORRESPONDENCE RECEIVED: SCOPING PHASE 2018**



# GARDEN CITIES

NON PROFIT COMPANY (RF)

REG. NO. 1928/000607/08

50 LOUIS THIBAUT DRIVE  
EDGEMEAD 7441

TELEPHONE 021-558 7181  
TELEFAX 021-558 7172

ALL CORRESPONDENCE TO BE ADDRESSED TO:

THE CHIEF EXECUTIVE OFFICER  
P O BOX 166  
EDGEMEAD 7407

E-MAIL: [info@gcinc.co.za](mailto:info@gcinc.co.za)

25 May 2018

**Eco impact** (Environmental Health & Safety Legal Consulting)  
P O Box 45070  
Claremont  
7735

**Attention: Mr Nicolaas Hanekom**

E-MAILED  
[admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)

Dear Sirs and Madams

**PROPOSED EXPANSION OF THE COUNTY FAIR HOCRAFT ABATTOIR AND RENDERING FACILITY**

**PREVIOUS 2015 NOI DEA&DP REFERENCE NR: 16/3/3/6/7/1/A5/37/2318/15**

We acknowledge receipt of your letter dated 16 May 2018 affording us the opportunity to comment and raise any concerns on the proposed expansion of the County Fair hocraft abattoir. We hereby wish to register as an Interested and Affected Party.

As landowner and developer of the residential development (Greenville Garden Cities in Fisantekraal) north of the proposed expansion and more prominently the Mosselbank River which runs through the development and wetland conservation area just north-east of the abattoir. We would like to take this opportunity to bring some points of concern to your attention.

**(i) Potential runoff/ discharge into the river course**

Abattoir wastewater is very harmful to the environment and many studies have proven that these discharges can cause deoxygenation of rivers. If wastewater will be discharged in the Mosselbank River (on Garden Cities property), Garden Cities requests that (A) water quality of the discharges are closely monitored and of sound quality; and (B) monthly water quality test are made available for surrounding land owners which will inform them of the environmental conditions they (and their livestock) are exposed to. Garden Cities' current tenant are also required to conduct water quality tests as per conditions of the General Authorisation. The water tests are required to be within the Department Water and Sanitation parameters – therefor any unlawful activates/ discharges will be potentially questioned.

1/3

ENQUIRIES: Mr R Smith, Ms D Sterrenberg  
REFERENCE: GV/ G.1 General  
DS

DIRECTORS: S S STUTTAFORD (CHAIRMAN) P D A BAIRNSFATHER CLOETE V A CHRISTIAN M FEBRUARY (Mrs) P J HEEGER J ISAACS  
T E MAFATLE R A MARSH E R STUTTAFORD M D STUTTAFORD J E WHITE  
CHIEF EXECUTIVE OFFICER : J W MATTHEWS COMPANY SECRETARY : K MILAN

Garden Cities is investing a great deal of time and funds into the rehabilitation of the Mosselbank River and Environmental Education in order to restore ecological functions and create an environment that is safe and secure for the surrounding community. We will therefore appreciate effort from County fair in terms of engagement and transparency during this process as they are very much a stakeholder in our programme and have pledged to make efforts to be environmentally conscious.

Lastly, should waste water discharge increase, we hope methods are incorporated to reduce the amount of water discharged on receiving waters, especially now during the drought crises.

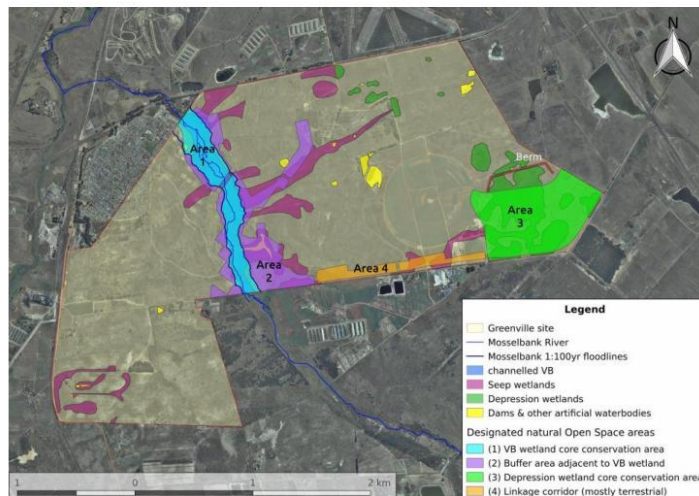
**(ii) Impact on the river course (fauna, flora and people)**

Abattoir waste water contains high organic content, organic biological nutrients and suspended solids. If upstream concentrations of these elements are high, it can very much have an impact on the water quality downstream. These impacts on receiving waters consequently create high competition for oxygen within the ecosystem. Consequently, algae increases, aquatic life become stressed and hydrogen sulphide gas is released which creates an unpleasant smell. Additionally the river is used for recreational purposes, therefore the possible health risks to both animals and people living near the abattoir and river vicinity need to be studied/considered.

**(iii) Impact on future development and conservation/ sensitive areas**

Additionally, there would be an added potential risk for future developments. Both Garden Cities and County Fair need to consider the impacts of the expanded abattoir on the adjacent future developments and the restoration of the depression wetland and terrestrial corridor on the County Fair boarder (picture to right).

Both parties must take cognisance of the impact of the animals (at the abattoir) on the development and vice versa, especially regarding the potential health risks and spreading of diseases. What measures will be implemented or are already implemented by County Fair to prevent spread of disease to adjacent tenants and animals/livestock?



3/3

ENQUIRIES: Mr R Smith, Ms D Sterrenberg  
REFERENCE: GV/ G.1 General  
DS

DIRECTORS: S S STUTTAFORD (CHAIRMAN) P D A BAIRNSFATHER CLOETE V A CHRISTIAN M FEBRUARY (Mrs) P J HEEGER J ISAACS  
T E MAFATLE R A MARSH E R STUTTAFORD M D STUTTAFORD J E WHITE  
CHIEF EXECUTIVE OFFICER : J W MATTHEWS COMPANY SECRETARY : K MILAN

***(iv) Upsizing/improvement to water treatment facility***

With the expansion of the abattoir, the upsizing and/or improvement of the water treatment facility is required in order to handle the excess waste water. We suggest either using (A) Electrocoagulation which is a road-spectrum treatment technology that removes total suspended solids, heavy metals, emulsified oils, bacteria and other contaminants from water or; (B) Sub-surface flow constructed wetland system which is a natural process of removing pollutants in waste water. In essence it's a large gravel and sand-filled basin that is planted with wetland vegetation.

Lastly, we acknowledge that with the expansion, additional job opportunities will be made available and we encourage County Fair to us local labour within Fisantekraal to alleviate unemployment in the area.

We would appreciate feedback in above regard and trust we are kept abreast of all developments relating to the proposed expansion of the County Fair Hocraft abattoir.

Yours faithfully



GARDEN CITIES NPC (RF)

3/3

ENQUIRIES: Mr R Smith, Ms D Sterrenberg  
REFERENCE: GV/ G.1 General  
DS

DIRECTORS: S S STUTTAFORD (CHAIRMAN) P D A BAIRNSFATHER CLOETE V A CHRISTIAN M FEBRUARY (Mrs) P J HEEGER J ISAACS  
T E MAFATLE R A MARSH E R STUTTAFORD M D STUTTAFORD J E WHITE  
CHIEF EXECUTIVE OFFICER : J W MATTHEWS COMPANY SECRETARY : K MILAN

**Pat Titmuss**

Environmental & Heritage Management Branch  
Environmental Management Department

T + 27 21 444 0597 F + 27 21 444 0597 M + 27 83 701 4318  
M pat.titmuss@capetown.gov.za W www.tda.gov.za

DEA&DP Reference: 16/3/3/6/7/A5/37/2318/15  
CCT Reference: KFN21/1/2/2/156

04 October 2018

Eco Impact Legal Consulting (Pty) Ltd  
PO Box 45070  
Claremont  
7735

**Attention: Ms. Yolandie Henstock** [via e-mail: admin@ecoimpact.co.za]

Dear Madam

**PORTION 16 OF PAARL FARM JUMBO 724, DURBANVILLE: PROPOSED EXPANSION OF THE ABATTOIR AND RENDERING FACILITY AND ATMOSPHERIC EMISSION LICENCE VARIATION - SCOPING REPORT**

The abovementioned Scoping Report, dated 17 August 2018, refers.

The following technical comment is provided:

**1. TRANSPORT AND DEVELOPMENT AUTHORITY (TDA): Development Management Department**

- 1.1 It must be noted that the zoning references on SDP (1) are incorrect, as they refer to the historic zoning scheme designations of "Agricultural Zone 1" and "Agricultural Zone 2". In terms of the City's Development Management Scheme, both portions are zoned "Agricultural Zone" with the 12.1ha portion deemed to have a consent for "Agricultural Industry".
- 1.2 As per our previous comments, a number of building line departures is required. Prior to submission of a development management application, the applicants are advised to arrange a pre-submission meeting with the final SDP in order to clarify the exact nature and extent of buildings and operations on the western portion, as an application for consent for "agricultural industry" may possibly also be required for this portion.

**2. CITY HEALTH: Environmental Health Department**

- 2.1 The Department indicated that the recommendations given in 2015 still apply. Please see Annexure A below.

**3. SPECIALISED ENVIRONMENTAL HEALTH: Air Quality Management Branch**

- 3.1 Application must be made for the authorisation of the installation and operation of fuel-burning equipment in terms of Section 11 & 12 of the City of Cape Town Air Quality Management By-Law, no 7662, 17 August 2016, prior to the installation of the new boilers. Any correspondence or enquiries in this regard can be directed to Lumko Vazi at [lumko.vazi@capetown.gov.za](mailto:lumko.vazi@capetown.gov.za) or telephone 021 590 5200.
- 3.2 In this regard, building plans for the boiler installation must be submitted to Building Development Management for approval. The plans must indicate the chimney position and



dimensions relative to the building. Please contact Lumko Vazi at [lumko.vazi@capetown.gov.za](mailto:lumko.vazi@capetown.gov.za) or telephone 021 590 5200 for assistance with the chimney height calculation.

- 3.3 An application for the variation of the existing Atmospheric Emissions Licence (AEL), in terms of Section 46 of the National Environmental Management Air Quality Act, Act 39 of 2004 as amended, must be submitted on the South African Atmospheric Emission Licence & Inventory Portal (SAAELIP). Please contact Lumko Vazi at [lumko.vazi@capetown.gov.za](mailto:lumko.vazi@capetown.gov.za) or telephone 021 590 5200 for any assistance. Please note that whilst this application may be submitted concurrently with the EIA application, the varied AEL may only be finalised once the Environmental Authorisation (EA) has been granted.
- 3.4 Based on the proposed increase in production capacity, Air Quality Management is of the opinion that there will be an increase in emissions from both the facilities. It is noted that the Scoping Report does not adequately address the capacity of the odour abatement equipment. An engineering assessment of the capacity of the system must be undertaken and the findings are to be included in the Final Scoping Report.
- 3.5 Given the encroachment of the Garden City residential development on the northern boundary of the property, an Air Quality/Odour Impact Assessment with Dispersion Modelling must be undertaken to address the possible increase in air quality impacts on the receiving environment. This assessment must be conducted in accordance with the Dispersion Modelling Regulations, Regulation No. R 533 of 11 July 2014.
- 3.6 A Fugitive Emissions and Odour Management plan must be formulated for the facility and be included in the Environmental Management Plan (EMP).
- 3.7 No dust nuisance is to be created during the construction phase and provision is to be made for the implementation of dust mitigation measures.
- 3.8 Activities during the construction phase must comply with the provisions set out in Section 26 (Dust emissions) of the City of Cape Town: Air Quality Management By-law 2016, dated 17 August 2016.
- 3.9 Should any cement silos be employed on site, the silos are to be fitted with appropriate dust control systems for emissions abatement during bulk materials loading and transfer operations.
- 3.10 The City of Cape Town's Head: Specialised Environmental Health Services / Air Quality Officer reserve the right to call for amendments to the Dust fall Monitoring, should the need arise.

#### 4. SPECIALISED ENVIRONMENTAL HEALTH: Mechanical Engineering - Noise Division

- 4.1 The application was assessed in terms of *Western Cape Noise Control Regulations PN 200 of 2013* (see below extract) and *SANS 10103:2008* – The measurement and rating of environmental noise with respect to annoyance and to speech communication.
- 4.2 The Mechanical Engineering; Noise Division reserves the right to call for a Noise Impact Assessment or Noise Management Plan should any complaints be received.
- 4.3 The Noise Control department has no objection provided that any noise emissions from activities during the operations, comply with the Noise Control Regulations PN200/13 in that:
  - a. The SANS 10103 Table 2 – typical rating levels for noise in districts are adhered to.
  - b. No Noise Disturbance is caused in terms of the Provincial Noise Control Regulation N200/13.
  - c. No Noise Nuisance is caused in terms of the Provincial Noise Control Regulation PN 200/13.

#### 5. WATER AND SANITATION: Water Demand Management & Planning Branch

**Milnerton Civic Centre**  
87 Pienaar Road, Milnerton, 7441  
PO Box 35, Milnerton, 7435

**Iziko Izoluntu Milnerton**  
87 Pienaar Road, Milnerton, 7441  
PO Box 35, Milnerton, 7435

**Burgersentrum Milnerton**  
Pienaarweg 87, Milnerton, 7441  
Posbus 35, Milnerton, 7435

Table 1.1: Estimated water and sewer demands provided by you

Zoning	ERF	AADD	Design flows		ADWF	Design flows	
	Units	Qty (l/d)	Kl/day	Peak Flow (l/s) PF = 4	Qty**	Kl/day Y	Peak Flow (l/s) PF = 2.5
Agricultural	N/A	No info	No info	No info	4400000	4400	127

\*\* Based on a 100% sewer flow design criterion

#### Water

- 5.1 The information provided is vague. More information of the current and proposed potable water demand is required to provide a detailed comment.
- 5.2 Under drought conditions there is expected to be aggressive pressure management that could result in pressure drops, the developer is required to take this into account.
- 5.3 The developer is expected to incorporate water demand management measures into the development.

#### Bulk Water

- 5.4 No Bulk Water pipelines or infrastructures under the control of the Bulk Water Branch are directly affected by the proposed residential development.
- 5.5 This comment may be revised upon receiving comment from the Bulk Water Branch.

#### Sewer

- 5.6 Sewage and effluent will be treated at the upgraded WWTW on site.
- 5.7 From the scoping report, the expected wastewater flow is 4,4 Ml/day, and according to the scoping report the WWTW was originally designed to handle a hydraulic load of 5,5 Ml/day.
- 5.8 It is questioned whether the treated effluent produced at the on-site wastewater treatment plant will be reused on site.
- 5.9 No sludge will be allowed into the sewer system; all sludge produced must be transported to a landfill site for disposal.

#### Wastewater

- 5.10 Sewage and effluent will be treated at the upgraded WWTW on site.

#### Water Pollution Control

- 5.11 The developer will be required to meet with water pollution control. The developer must conform to all bylaws related to industrial effluent and there will be a need to have an agreement in place with the City on the quality and volume of effluent discharge to the stormwater or sewer system.

#### Conclusion

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- 5.12 Sufficient water demand information has not been provided. The sludge produced is to be disposed of at a landfill site. Clarity is required on whether the treated effluent produced at the WWTW will be reused on the property.

General/ Disclaimer

Information provided is based on best available data.

The flows and pressures provided in this comment are theoretical and not measured.

All diameters, levels, dimensions and positions of existing infrastructure provided need to be checked on site.

**6. WATER AND SANITATION: Stormwater and Catchment Planning Branch**

- 6.1 The Scoping Report seeks to address the management of stormwater and surface flow by the introduction of a new additional forebay structure and bio-retention pond and routing of all stormwater to the new wet attenuation pond above the existing informal dam via an open channel. However, no mention is made of how untreated effluent spillages and associated emergency clean-up procedures will be managed / addressed. This Department's previous 2015 comment on the previous DBAR specifically requested clarity on this issue.
- 6.2 Provide details of the proposed open channel leading from the proposed new bio-retention pond to the proposed new wet attenuation pond, indicating if this is to be permeable, e.g. Armourflex or impermeable, e.g. concrete lined?
- 6.3 Provide clarity on the existing effluent treatment facility's capacity to treat current and proposed future extensions, volumes of effluent. Furthermore, the oversaturation of the ground has led to surface water run-off discharging directly to the tributary feeding into the Mosselbank River. Thus, the effluent treatment facility has to be increased in order to limit the release of treated wastewater into the Mosselbank River during summer and winter months to reduce the likelihood and extent of eutrophication within the river and its effects such as localised developments of anoxic pools.
- 6.4 It is noted that stormwater rooftop runoff for the broiler camps will be contained in the open areas between the broiler houses. Details on how this water will be attenuated and treated, what the storage volumes are and the attenuation capacity needs to be provided. Furthermore, where this "treated stormwater" will be discharged and how will surface runoff be accommodated within the catchment is to be provided.
- 6.5 The "Buffer" times and volumes available to accommodate electricity outages, as previously requested is to be provided.
- 6.6 It is noted that the effluent is to be recycled and reused to reduce water consumption and the release of treated effluent into the environment. The current and proposed volumes of treated effluent usage and treated effluent discharge into the Mosselbank River are to be provided. Discharge into the Mosselbank River must be avoided at all cost, as new housing developments are found downstream of County Fair's precinct, straddling the Mosselbank River. County fair must engage with neighbouring farm owners and establish a "Water Scheme Supply Agreement" and develop appropriate irrigation infrastructure, to minimise the treated effluent discharge volumes into the Mosselbank River.
- 6.7 It is noted that the Department of Water & Sanitation communication (dated: 03 November 2015) indicates that a Water Use License is not triggered, conditions apply.
- 6.7.1 This Department cannot agree, previous correspondence noted the treatment of effluent on site and the discharge or use of said effluent for irrigation as well as discharge to the Mosselbank River.



- 6.7.2 Further, the last point under item 7.1 (Water Use Authorisation Application - Scoping Report, Pg. 39 of 50) notes that the DWS will amend the existing License.
- 6.7.3 This Department therefore reiterates its previous comment that the City would like to have a copy of the Department of Water & Sanitation approved Water Use License, which confirms the discharge of treated effluent water into the Mosselbank River, and must include the discharge quantity (m<sup>3</sup>) allowed during the winter and summer months respectively and the volumes of effluent used onsite.
- 6.8 There are substantial amounts of outstanding stormwater issues (listed below) which were part of previous Department of Environmental Affairs and Development Planning, Department of Water & Sanitation as well as City's Stormwater By-law transgression directives on this property. These outstanding stormwater issues, listed below, must be included into this EIA process.
- 6.8.1 Stormwater overland (sheet flow) runoff calculations for the entire County Fair Hocrast abattoir precinct/ farm and associated stormwater attenuation facilities.
  - 6.8.2 New stormwater dam's civil engineering design drawings
  - 6.8.3 stormwater pond design
  - 6.8.4 inlet & outlet structures
  - 6.8.5 forebay and stilling basin
  - 6.8.6 emergency overflow structures
  - 6.8.7 erosion protection
  - 6.8.8 Overland flow routes
  - 6.8.9 The written agreement between Garden Cities tenant (Groenvlei Gras) and County Fair, concerning the treated effluent water transfer and usage.
  - 6.8.10 Treated effluent discharge volumes to Groenvlei Gras/Garden cities during winter and summer months respectively, must be quantified.
- 6.9 A Holistic Stormwater Management Plan (H-SWMP) must be compiled and submitted to this office for approval, for the entire County Fair Hocrast abattoir and rendering facility/ precinct / farm situated on portion of farm Jumbo no. 724, Kraaifontein. This H-SWMP must indicate impacts of the proposed current and future operations activities on stormwater runoff management on/ from this site as well as surrounding erven; furthermore, this H-SWMP must address the following issues (providing supporting calculations):
- 6.9.1 The City's "Design Rainfall Depth Grid" data which includes 15% for Climate Change (obtainable from this office) must be used for all stormwater runoff, attenuation and treatment calculations.
  - 6.9.2 Identify the holistic catchment area and sub-catchment areas and state how stormwater will be management with regard to quality and quantity per sub-catchment.
  - 6.9.3 Protect stability of downstream channels by 24 hour extended detention of the 1 year RI, 24 hour storm event
  - 6.9.4 Protect downstream properties from fairly frequent nuisance floods by reducing the peak flow to pre-development levels for all events up to the 10 year RI peak flow
  - 6.9.5 Protect floodplain developments and floodplains from adverse impacts of extreme floods by reducing the peak flow to existing development levels for all events up to the 50 year RI peak flow.
  - 6.9.6 Elaborate on stormwater runoff treatment/quality improvements as stipulated in the Management of Urban Stormwater Impacts Policy, approved by Council: 27 May 2009. The design storm event for water quality treatment is the ½ year RI, 24 hour storm, and pollution removal targets are 80% reduction in suspended solids and 45 % reduction in total phosphorous.
  - 6.9.7 Management of overland stormwater run-off from this erf/ farm (farm Jumbo no. 724) and surrounding properties, especially upstream properties.
  - 6.9.8 Identification and accommodation of stormwater overland escape routes for floods greater than the 1: 50 year storm event for the mining site.



- 6.9.9 Expansion of the existing effluent treatment facility to treat current and proposed abattoir and rendering facility untreated effluent discharge.
- 6.9.10 Design of attenuation facilities for effluent discharge (Treated or untreated) from the current and proposed abattoir and rendering facility extensions.
- 6.9.11 Elaborate on implementation of Best (Stormwater) Management Practices (BMP) on this development precinct, to reduce stormwater runoff i.e. reuse of water in the abattoir facilities, water features, rain gardens, vegetated bio-swales, infiltration planters, irrigation etc.
- 6.10 Management of County Fair Hocrast abattoir and rendering facility must attach the following to the SWMP as an annexure:
  - 6.10.1 Department of Water & Sanitation, approved Water Use Licence
  - 6.10.2 Irrigation agreement, between County Fair and neighbour, Julian Visser from Groenvlei Gras/Garden Cities.
- 6.11 Reference is made to the EMP within the Scoping Report; however the EMP was not included with the documentation provided. The EMP must address the following:
  - 6.11.1 The protection of the Environment from construction works on site, e.g. mixing of concrete, erosion, and pollution from hydrocarbon sources.
  - 6.11.2 Indicate bunded refuelling stations on site and elaborates on emergency procedures during hydraulic oil or diesel spillage event etc. Bunded areas must be able to accommodate 110% of the fuel contained in case of spillage / ruptures etc.
- 6.12 In addition, if any of the steps required above will require further authorisation from any other organ of state, such authorisation (s) must be obtained and be brought to this office's attention (e.g. Water Use License, Environmental Authorisation, General Authorisation or renewal/ amendment etc.)

## 7. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Environmental Management Department

### DSR

- 7.1 The covering letter (dated 17 August 2018) which was attached to the report indicates it as the Draft Scoping Report, however throughout the document as the footer note; it is referred to as a Final Scoping Report. This is to be corrected.
- 7.2 The hard copy of the DSR is printed in black and white which makes the assessment of graph, maps and aerial photographs difficult. This is to be corrected.
- 7.3 It is noted that the proposed expansion will only occur within the current rendering facility area which is on the eastern corner of Portion 16 of Farm 724. Throughout the report the terms "study area", "site" and "property" are used, which either refers to the whole farm, the proposed expansion site or a specific area. This leads to confusion when assessing where specifically the proposed activities are to occur. These terms are to be clearly defined.
- 7.4 Figure 8 on Page 27 does not clearly indicate the site. Kindly note the report states see Figure 1 for biodiversity overlay but it is actually figure 8.

The following inconsistencies identified below are to be addressed and/or corrected:

- 7.5 Page 7-8 under Section 1.1 Application for environmental authorization and proposed project description indicates a proposed new gravel road listed in the list of activities however this is not indicated on the list of activities legend on the Site Development Plan drawing (SDP Primary Processing Plan, Drawing No: 718-S-001, dated 10 May 2018) as compiled by MPRO Consulting Engineers.

- 7.6 The proposed new turning area (number 22) on the Site Development Plan (SDP Primary Processing Plan, Drawing No: 718-S-001, dated 10 May 2018 as compiled by MPRO Consulting Engineers) indicates that it will be built over a section of the existing sludge pools. There is however no discussion within the Scoping report on how this will be done or if a road can be built over a sludge pool. There is also no indication on the drawing of a buffer zone between the remaining sludge ponds and proposed new turning area access road.
- 7.7 The following statements are noted on page 11 under Section Effluent Treatment from Abattoir and Rendering facility: "The existing WWTW can be upgraded to comply with future treatment capacity without the requirement for additional major civils or earthworks construction" and "The wastewater flow would then increase to an estimated 4,400 m<sup>3</sup>/day and at same pollution concentration as the current situation".  
If the current WWTW can be upgraded to handle the expected waste water flow from the proposed abattoir and rendering facility, the need for a new WWTW facility (new effluent treatment plant) as indicated on the Site Development Plan (Drawing No: 718-S-001, SDP Primary Processing Plan, dated 10 May 2018 by MPRO Consulting Engineers) is questioned.
- 7.8 Page 15 under Section Stormwater Management Plan "In order to achieve the attenuation for the abattoir site, it is intended to create a wet attenuation pond just above the existing informal dam below the northern waste water treatment ponds". Does the new wet attenuation pond being proposed mean formalizing the current informal pond? If so, the process of formalizing of the pond is to be provided.
- 7.9 Page 24 under Section 2.3.1. Biophysical Elements states that "The proposed expansions and associated infrastructures, such as the stormwater management structures will not impact on any Critical Biodiversity or Ecological Support Areas." This is incorrect as the Site Layout Plan (Drawing No: 718-S-002, Rev 2, dated 11 May 2018 by MPRO Consulting Engineers) indicates "new attenuation wet pond" and "new formalized spillway" to occur in areas identified on the City's Biodiversity Network (see extract below).



#### Comments and Responses Report

- 7.10 The responses in the Comments and Responses refer to "amended BAR". This is incorrect as the current report is the Draft Scoping Report. Furthermore, the amendments have not been done as indicated and therefore cannot be further assessed.
- 7.11 The Water Use Licence indicated on page 18 is to be provided.

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#### Specialist studies

- 7.12 A Freshwater Impact Assessment is to be conducted to assess the additional facilities proposed and its affect it will have on the Mosselbank River. The aspects of water quality and river health of effluent overflows in the Mosselbank River are also to be assessed.
- 7.13 No contingency plan should any failures of the effluent treatment facility is experienced has been provided. This needs to be addressed.

#### Environmental Management Plan (EMP)

The EMP is to address the following:

- 7.14 The methodology of how the effluent is to be recycled and reused
- 7.15 Waste management and disposal (of all waste generated on site)

### **CONCLUSION**

The above comments and requirements raised by the City of Cape Town are to be addressed in the 2<sup>nd</sup> Draft of the Scoping Report.

Yours faithfully



**PAT TITMUSS**

**Regional Manager: Environmental & Heritage Management – Northern Region**

**ANNEXURE A****CITY HEALTH: Environmental Health Department 2015 recommendations**

1. The applicant must comply with the City of Cape Town's Environmental Health By-Law, No. 13333 of June 2003, Part 1, (Prevention and Suppression of Health Nuisances).
2. Building plans must be submitted for new buildings and for any alterations to the existing building.
3. Facilities must be provided for persons with disabilities in accordance with SANS 10400-S: 2011 Edition 3. This includes ramps/walkways, toilet facilities and removal of obstructions in the path of travel of disabled persons.
4. Adequate toilet facilities must be provided in accordance with SANS 0400 of 1990 (Table 6).
5. The premises must comply with the Western Cape Noise Control Regulation P.N. 200/2013 by not creating a disturbing noise or noise nuisance to surrounding property owners. Any noise producing plant or equipment must be adequately muffled.
6. The premises must comply with the Tobacco Product Control Act (Act No. 83 of 1993 as amended).
7. The premises must be made rodent proofed in accordance to the Government Rodent Proofing Regulations.
8. All refuse must be stored in such a manner so as to not create a health nuisance pending removal.
9. No surface or ground water may be polluted due to any activity taking place on the premises.
10. All sewage and waste waters must be handled and treated and disposed of in such a manner that it causes no health nuisance/hazard to anyone who may be working on the premises, abutting neighbours, any visitors to the premises and the environment.
11. The water quality of the final waste water must comply with the standards as set out in the National water Act, Act No. 36 of 1998.
12. Monitoring and management measures must be put in place to control and prevent the breeding of flies, insects and odours that may originate from these activities.
13. The Director: City Health reserves the right to call for additional requirements if the full manner and use of the erven should so warrant.

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**REFERENCE:** 19/2/9/3/A5/37/WL0045/15

The Director/s  
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7475

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Cell: +27 72 240 3092

Email: [Sandra.Venter@countryfair.co.za](mailto:Sandra.Venter@countryfair.co.za)

**For attention:** Matthys Potgieter

**ACKNOWLEDGEMENT OF RECEIPT ON THE PRE-APPLICATION SCOPING REPORT FOR THE PROPOSED EXPANSION OF THE ABATTOIR AND RENDERING FACILITY AND ATMOSPHERIC EMISSIONS LICENSE VARIATION, PORTION OF FARM JUMBO 724, DURBANVILLE**

1. The above-mentioned documentation received by the Department of Environmental Affairs and Development Planning, Directorate: Waste Management (hereafter 'the Department'), dated 17 August 2018, as received by the Department on 17 August 2018, refers.
2. This letter serves as an acknowledgment of receipt of the aforementioned document by the Directorate: Waste Management.
3. The Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours faithfully,



**LANCE MCBAIN-CHARLES**  
**DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING**

**DATE:** 2018/8/29

Cc: (1) Nicolaas Hanekom

Email: [admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)

REFERENCE: 19/2/5/3/A5/37/WL0045/15

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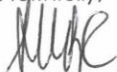
Email: [Sandra.Venter@countryfair.co.za](mailto:Sandra.Venter@countryfair.co.za)

For attention: Mr Matthys Potgieter

**COMMENTS ON THE PRE-APPLICATION SCOPING REPORT FOR THE PROPOSED EXPANSION OF THE  
ABATTOIR AND RENDERING FACILITY AND ATMOSPHERIC EMISSIONS LICENSE VARIATION, PORTION  
OF FARM JUMBO 724, DURBANVILLE**

1. The above-mentioned documentation dated 17 August 2018, as received by the Department of Environmental Affairs and Development Planning, Directorate: Waste Management (hereafter 'the Department'), on the same day, refers.
2. Kindly clarify if the document is a pre-application, draft, or a final Scoping Report, as there are contradictions through the report (bottom of page, first page, and page 36 (subsection 5.5)).
3. The Department request that you insert a clear picture in colour for the site notice in Appendix F, to be able to note which listed activities triggered were included on the notice.
4. Where will the effluent resulting from drying the sludge be send to?
5. When did rendering commence at the Facility? What quantities of general and hazardous waste are rendered, and had the throughput increased since commencement?
6. Should the Facility intend to apply the following listed activities in National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), Government Notice No. 921 of 29 November 2013, "List of waste management activities that have, or are likely to have, a detrimental effect on the environment" listed activities Category A 3 (7) or B 4 (6), the application must be lodged with the National Department of Environmental Affairs.
7. The Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours faithfully,



**LANCE MCBAIN-CHARLES**

**DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING**

DATE: 2018/9/17

Cc: (1) Mr Nicolaas Hanekom

Email: [admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)



**Western Cape  
Government**  
Environmental Affairs and  
Development Planning

**DIRECTORATE: DEVELOPMENT MANAGEMENT  
REGION 1**

**EIA REFERENCE:** 16/3/3/6/7/2/A5/20/2159/18

**ENQUIRIES:** AYESHA HAMDULAY

**DATE OF ISSUE:** 2018 -09- 17

The Board of Directors  
County Fair  
P O Box 94  
**EPPING DUST**  
7475

**Attention: Matthys Potgieter**

Tel.: (021) 884 3013

Fax: (021) 884 3042

Dear Sir

**COMMENT ON THE PRE-APPLICATION SCOPING REPORT IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") AND THE ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED): THE PROPOSED EXPANSION OF AN EXISTING ABATTOIR AND RENDERING FACILITY ON A PORTION OF THE FARM JUMBO NO. 724, KRAAIFONTEIN**

1. The pre-application Scoping Report with cover letter dated 17 August 2018, received by this Department on the same date, refer.
2. This department notes that the existing abattoir and rendering facility on a Portion of the Farm Jumbo No. 724, Kraaifontein will be expanded by approximately 2.1ha on land zoned Agricultural Zone 2.
3. Listed Activities  
After considering the information provided in the Scoping Report, this Department notes that the proposed development constitutes the following listed activities as defined in terms of the EIA Regulations, 2014 (as amended)):

**Item 19 of GN No. R983 (as amended):**

*"The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving—*

*(a) will occur behind a development setback;*

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[www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp)

*Mayane*

- (b) is for maintenance purposes undertaken in accordance with a maintenance management plan;
- (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;
- (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or
- (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies."

**Item 34 of GN No R.983 (as amended):**

"The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution, excluding—

- (i) where the facility, infrastructure, process or activity is included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies;
- (ii) the expansion of existing facilities or infrastructure for the treatment of effluent, wastewater, polluted water or sewage where the capacity will be increased by less than 15 000 cubic metres per day; or
- (iii) the expansion is directly related to aquaculture facilities or infrastructure where the wastewater discharge capacity will be increased by 50 cubic meters or less per day."

**Item 38 of GN No R.983 (as amended):**

"The expansion and related operation of facilities for the slaughter of animals where the daily product throughput will be increased by more than—

- (i) 50 poultry;
- (ii) 6 units of reptiles, red meat and game; or
- (iii) 20 000 kg wet weight per annum of fish, crustaceans or amphibians."

**Item 40 of GN No. R983 (as amended):**

"The expansion and related operation of facilities for the concentration of poultry, excluding chicks younger than 20 days, where the capacity of the facility will be increased by—

- (i) more than 1 000 poultry where the facility is situated within an urban area; or
- (ii) more than 5 000 poultry per facility situated outside an urban area."

**Item 48 of GN No. R.983 (as amended):**

"The expansion of—

- (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or
- (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more;

where such expansion occurs—

- (a) within a watercourse;
- (b) in front of a development setback; or



(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;

excluding—

(aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;

(bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;

(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;

(dd) where such expansion occurs within an urban area; or

(ee) where such expansion occurs within existing roads, road reserves or railway line reserves."

4. Process

A Basic Assessment ("BA") Process 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 BA Process. Failure to include any applicable listed activity may invalidate the application.

You are referred to Appendix 1 of GN No. R. 982 (as amended) for the requirements with respect to the 'contents of a basic assessment report'. You are advised that when undertaking the BA Process you must take into account this Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended) as well as any other guidance provided by this Department. This Department's guidelines can be downloaded from the Department's website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp). In particular, the guidelines that may be applicable to the proposed development include, *inter alia*, the following:

- 1.1. Guideline for Environmental Management Plans (June 2005)
- 1.2. Guideline on Exemption Applications (March 2013)
- 1.3. Guideline on Public Participation (March 2013)
- 1.4. Guideline on Alternatives (March 2013)
- 1.5. Guideline on Need and Desirability (March 2013)

5. Request for a Specific Fee Reference

This Department reminds you that the "Request for a specific fee reference number" form must be completed and submitted to this Department prior to submission of the formal application for the abovementioned proposed development. This Department advises that the Request for a Specific Fee Reference Number Form be submitted to this Department approximately 30 days before the intended date for the submission of the Application Form for Environmental Authorisation. Upon receipt of the specific fee reference number, the reference number must be inserted into the Application Form for Environmental Authorisation and proof of payment of the applicable fee attached when the Application Form is submitted to this Department.

6. Alternatives

Be advised that in terms of the EIA Regulations, 2014 (as amended) and the 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 this Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for as specified in Regulation 20 of GN No. R. 982 (as amended). 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.e., 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 proof that the investigation was undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the 'No-Go' option exist.

7. Public Participation Process

A Public Participation Process ("PPP") that meets the requirements of Regulation 41 of the EIA Regulations, 2014 (as amended) 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 ("EAP") discretion whether to meet the requirements of Regulation 41 during the 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 Basic Assessment Report ("BAR").

8. In terms of Section 24O (2) and (3) of NEMA and Regulations 7(2) and 43(2) of the EIA Regulations, 2014 (as amended), 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 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 24O (2) and (3) of NEMA in the pre-application BAR, where appropriate. It is noted that, amongst others, the following State Departments and Organs of State must be consulted during the EIA process as part of the PPP:

- 8.1. CapeNature;
- 8.2. Heritage Western Cape;
- 8.3. The City of Cape Town;
- 8.4. The Western Cape Government: Health;
- 8.5. The Western Cape Government: Agriculture;
- 8.6. The Western Cape Government: Transport and Public Works;
- 8.7. DEA&DP: Pollution and Chemicals Management;
- 8.8. DEA&DP: Waste Management;
- 8.9. The National Department of Water and Sanitation; and
- 8.10. The National Department of Agriculture, Forestry and Fisheries.

In terms of good environmental practice 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 pre-application BAR available to State Departments as stipulated above.

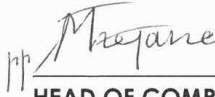
The person conducting the PPP must fulfil the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended) and must take into account any applicable Guidelines published in terms of Section 24J of the NEMA, this Department's Circular EADP 0028/2014 on the "One

Environmental Management System” and the EIA Regulations 2014 (as amended), as well as any other guidance provided by this Department. Note that the public participation requirements are applicable to all proposed alternatives.

9. Environmental Management Programme  
In accordance with Section 24N of the NEMA and Regulation 19, this Department hereby requires the submission of an EMPr. The contents of such an EMPr must meet the requirements outlined in Section 24N of the NEMA (as amended) and Regulation 19 of the EIA Regulations, 2014 (as amended). The EMPr 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 EMPr must be submitted together with the pre-application BAR. This Department would like to advise that in compiling the EMPr, this Department's Guideline for Environmental Management Plans (June 2005), available on this Department's website must be taken into account as well as Appendix 4 of the EIA Regulations, 2014 (as amended).
10. Need and Desirability  
In terms of the EIA Regulations, 2014 (as amended) when considering an application, this Department must take into account a number of specific considerations including, *inter alia*, the need for and desirability of any development proposal. As such, the need for and desirability of the development proposal must be considered and reported on in the pre-application BAR. The pre-application 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.
11. This Department awaits the submission of the Application Form and/or pre-application BAR prescribed by the EIA Regulations, 2014 (as amended). Please note that two printed copies and one electronic copy (saved on CD/DVD) of the Application Form for Environmental Authorisation and/or pre-application BAR must be submitted.
12. 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 this 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:
  - 12.1. That additional information or documents will not be requested, or
  - 12.2. Of the outcome of the application.
13. 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 must also show how the proposed development meets the requirements of Sustainable Development.
14. It is prohibited in terms of Section 24F 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 in terms of the prohibition will result in the matter being referred to the Environmental Law Enforcement Directorate of this Department for possible prosecution. A person convicted of an offence in terms of the above is liable for a fine not exceeding R5 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
15. Kindly quote the abovementioned reference number in any future correspondence regarding this letter.

16. The Department reserves the right to revise or withdraw its comments and request further information from you based on any information received.

Yours faithfully



**HEAD OF COMPONENT**

**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Copied to: Mr Rafeeq Joseph

(EAP: Eco Impact)

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## SCIENTIFIC SERVICES

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**reference** SSD14/2/6/1/4/4/724-16\_abattoir\_Fisantekraal  
**date** 27 September 2018

Eco Impact Legal Consulting  
P.O. Box 45070  
Claremont  
7551

Attention: Yolandie Henstock  
By email: [admin@ecoimpact.co.za](mailto:admin@ecoimpact.co.za)

Dear Nicole

### **Draft Scoping Report for the Proposed Expansion of the County Fair Abattoir and Rendering Facility, Portion 16 of Farm 724, Fisantekraal**

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The application is for the expansion of an existing abattoir and associated poultry processing facilities. There was a previous application for this proposal which was within a Basic Assessment process. CapeNature's comments on the previous process have not been included within the comments and response report, however they remain relevant to this application. It is also noted that the Scoping Report aims to address various authorisations, including the amendment to the water use license, and is hence aligned to the operational agreement for synchronisation of authorisations, which is supported by CapeNature.

The expansion footprint will not encroach into any natural vegetation according to the Biodiversity Network for the City of Cape Town and the Western Cape Biodiversity Spatial Plan, which is verified through the site description and photographs. The natural vegetation fragments in the surroundings are unlikely to be affected by the proposed expansion, therefore CapeNature is satisfied that the proposed expansion will not result in the loss of terrestrial habitat of significant value.

There are several wetlands mapped on the property, including three farm dams (Other Ecological Support Area (ESA)) within the vicinity of the abattoir and a natural wetland directly downstream, classified as Critical ESA. The wetlands are associated with the headwaters of a minor tributary of the Mosselbank River. The Mosselbank River is located along the western boundary of the property with associated wetlands. The site description has included a description of the watercourse and wetlands in the vicinity of the abattoir.

CapeNature indicated concern regarding the impact of the facility on the freshwater features both on site and downstream in our previous comments. The proposed stormwater management plan has been described in the Scoping Report and it is evident that upgrades

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Bond-Smith, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

to both the existing wastewater treatment system and the stormwater drainage are proposed. It should be noted that this concern also relates to the other authorisations required for the application, and we further wish to emphasize that this does also relate to biodiversity in terms of freshwater ecology. It is noted that ecological specialist input is proposed, which must specifically assess the impacts on freshwater ecology, including the Mosselbank River and associated wetlands downstream of the facility.

In conclusion, CapeNature will comment further on the application in the EIA Phase. It must be ensured that impacts on freshwater ecology are adequately assessed, preferably with a freshwater specialist study. The full stormwater management plan must be included as an appendix. Information which is required to address impacts related to freshwater for other applications (e.g. water use license amendment) must be included within the NEMA process, as this is likely to address the same concerns.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rhett Smart', with a horizontal line underneath.

Rhett Smart  
For: Manager (Scientific Services)



**Western Cape  
Government**

Agriculture

Cor Van Der Walt  
LandUse Management  
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tel: +27 21 808 5099 fax: +27 21 808 5092

**OUR REFERENCE** : 20/9/2/2/4/208  
**YOUR REFERENCE** : -  
**ENQUIRIES** : Cor van der Walt

Eco Impact  
PO Box 45070  
CLAREMONT  
7735

Att: Yolande Henstock

**PROPOSED EXPANSION OF THE ABATTOIR AND REDERING FACILITY AND  
ATMOSPHERIC EMISSIONS LICENSE VARIATION: DIVISION CAPE  
PORTION OF FARM JUMBO NO 724**

Your application of 17 August 2018 has reference.

The Western Cape Department of Agriculture has no comment.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely

**Mr. CJ van der Walt**

Copy:

Department of Environmental Affairs and Development Planning  
1 Dorp Street  
Cape Town  
8001

**LANDUSE MANAGER: LANDUSE MANAGEMENT**  
**2018-10-15**