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Draft Scoping Report

South Group Recycling (Pty) Ltd

WML Application for the Recycling, Recovery and Treatment of Hazardous Waste by South Group Recycling (Pty) Ltd, Cape Town

Application Ref: Not Yet Available

Report Date: 11 February 2026

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Report Title	Waste Management License Application for the Recycling, Recovery and Treatment of Hazardous Waste by South Group Recycling (Pty) Ltd, located in Montague Gardens Cape Town
Report Date	11 February 2026
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Application Reference No:	Not Yet Available

EXECUTIVE SUMMARY

South Group Recycling (Pty) Ltd ("South Group") operates a small-scale waste storage and transfer facility located at 2 Warbler Cl, Montague Gardens, Cape Town. Current operations specialise in the sourcing, transport and storage of both e-waste, also referred to as electronic waste (inclusive of PC boards, electronic boards, computers, phones, appliances and electronics) and spent catalytic convertors. Once received the material is subject to manual sorting before being repackaged and exported for further processing and refining. An application for registration in terms of the National Norms and Standards for the Storage of Waste (GN 921) as well as the National Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening, Chipping or Baling of General Waste (GN1093) has been submitted to the Department of Forestry, Fisheries and the Environment ("DFFE") (**Annexure D**).

➤ Project Description

In recent years the electronic market has boomed, resulting in more electronic waste being generated than ever before. In response the need for responsible and sustainable management of electronic waste has increased. South Group want to capitalise on the opportunity by installing equipment such as horizontal crushers, hammer mills, vacuum filters, cone mixers and scientific ovens to undertake the recycling, recovery and treatment of electronic waste at their Cape Town facility.

South Group intend to utilise their existing waste storage and transfer facility in Unit 2 of the Marconi Estate located at 2 Warbler Cl, Montague Gardens, Cape Town. All operations will therefore be housed within the existing warehouse which is considered ideal for the proposed activities.

➤ Legal and Regulatory Requirements

In terms of the National Environmental Management: Waste Act 59 of 2008, no waste management activities published in terms of GN 921 (list of waste management activities that have or are likely to have a detrimental effect on the environment) may be undertaken without a Waste Management License.

Category B of GN 921 states that;

"A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must conduct a Scoping and Environmental Impact Reporting Process set out in the Environmental Impact Assessment Regulations made under Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as part of a waste management licence application contemplated in Section 45 read with Section 20(b) of this Act."

The proposed waste recycling, recovery and treatment activities to be undertaken by South Group, Cape Town will trigger the following activities listed under Category B of GN 921:

Table 1: GN 921 Listed Activities Triggered

GN 921 Listed Activity	Description
Category B Activity 2	The reuse or recycling of hazardous waste in excess of 1 ton per day, excluding reuse or recycling that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 3	The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 4	The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment
Category B Activity 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).

A Full Scoping EIA process must therefore be undertaken. The Competent Authority (CA) for this application has been identified as the National Department of Forestry, Fisheries and the Environment (“**DDFF**”).

Ongoing storage, sorting and screening activities also trigger Category C listed activities, for which registration applications have been submitted. Refer to **Annexure D** of this report.

➤ **Need and Desirability**

South Africa faces a growing e-waste challenge, compounded by the prohibition of e-waste disposal to landfills and limited formal recycling capacity. Improper disposal and illegal processing of e-waste pose significant environmental and human health risks due to the release of hazardous substances. The proposed project addresses a critical need by providing licensed capacity for the responsible recycling and recovery of valuable secondary resources, while supporting job creation, skills development and economic growth.

➤ **Alternatives Considered**

The no-go alternative is not supported, as it would result in the loss of environmental and socio-economic benefits and increased pressure on informal and illegal waste management practices. An alternative location was considered impractical due to financial, logistical and social impacts. Alternative processing technologies were evaluated but excluded due to high energy and water requirements, space constraints and operational impracticality within the leased facility.



➤ **Specialist Studies**

Based on the nature of the site and proposed activities and given that operations will be confined to an existing industrial warehouse, no specialist studies are proposed. A motivation for exclusion is provided under Section 2.4.1 of this report. A site visit was also undertaken, and findings summarised in a site verification report (**Annexure G**). Potential impacts will be assessed in detail during the Environmental Assessment Phase, and appropriate mitigation and monitoring measures will be included in the Environmental Management Programme (EMPr).

➤ **Public Participation**

A public participation process will be undertaken in accordance with Section 41 of NEMA. Interested and Affected Parties (I&APs) will be identified and notified through written notices, newspaper advertisements, site notices and the circulation of a Background Information Document. The Draft Scoping Report will be made available for public review and comment in both hard copy and electronic format. Comments and responses received during the Scoping Phase will be documented, and these records will be included in the Final Scoping Report for consideration by the Competent Authority.



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ABBREVIATIONS

BID	Background Information Document
CA	Competent Authority
CBA	Critical Biodiversity Area
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DWAF	Department of Water Affairs and Forestry
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMP	Environnemental Management Plan
EMPr	Environnemental Management Programme Report
ERP	Emergency Response Plan
ESA	Ecological Support Areas
ESIA	Environmental Social Impact Assessment
GIS	Geographic Information Systems
GN	Government Notice
GNR	Government Notice Regulations
I&APs	Interested and Affected Parties
km	Kilometre
m	metre
m/d	Meter per day
NAEIS	National Atmospheric Emission Inventory System
NEM:AQA	National Environmental Management: Air Quality Act
NEM:WA	National Environmental Management: Waste Act
NEMA	National Environmental Management Act
NGOs	Non-Governmental Organisations
NWA	National Water Act
PPE	Personal Protective Equipment
PPP	Public Participation Process
PM	Particulate Matter
SAHRA	South African Heritage Resources Agency
SDF	Spatial Development Plan
t/m	Tons per month
t/m³	Tons per cubic metre
µg/m³	micrograms per cubic meter
WML	Waste Management License
WUL	Water Use License

TERMS AND DEFINITIONS

TERM	DEFINITION
Commence	Means the start of any physical activity, including site preparation or any other activity on the site in furtherance of a waste management activity, but does not include any activity required for investigation or feasibility study purposes as long as such investigation or feasibility study does not constitute a waste management activity
Container	A disposable or re-usable vessel in which waste is placed for the purposes of storing, accumulating, handling, transporting, treating or disposing of that waste, and includes bins, bin-liners and skips;"
Disposal	Means the burial, deposit, discharge, abandoning, dumping, placing or release of any waste into, or onto, any land.
Dangerous Goods	Goods containing any of the substances as contemplated in South African National Standard No. 10234, supplement 2008 1.00: designated "List of classification and labelling of chemicals in accordance with the Globally Harmonized Systems (GHS)" published by Standards South Africa, and where the presence of such goods, regardless of quantity, in a blend or mixture, causes such blend or mixture to have one or more of the characteristics listed in the Hazard Statements in section 4.2.3, namely physical hazards, health hazards or environmental hazards
Development	Means the building, erection, construction or establishment of a facility, structure or infrastructure, including associated earthworks or borrow pits, that is necessary for the undertaking of a listed or specified activity, but excludes any modification, alteration or expansion of such a facility, structure or infrastructure, including associated earthworks or borrow pits, and excluding the redevelopment of the same facility in the same location, with the same capacity and footprint;
Environmental Impact Assessment	Means a systematic process of identifying, assessing and reporting environmental impacts associated with an activity and includes basic assessment and S&EIR
Expansion	Means the modification, extension, alteration and upgrading of a facility, structure or infrastructure at which a waste management activity takes place in such a manner that the capacity of the facility or the volume of waste recycled, used, treated, processed or disposed of is increased.
General Waste	Means waste that does not pose an immediate hazard or threat to health or to the environment, and includes- <ul style="list-style-type: none"> a) domestic waste; b) building and demolition waste; c) business waste d) inert waste; or

TERM	DEFINITION
	any waste classified as non-hazardous waste in terms of the regulations made under section 69, and includes non-hazardous substances, materials or objects within business, domestic, inert, building and demolition wastes.
Hazardous Waste	Means any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment and includes hazardous substances, materials or objects within business waste, residue deposits and residue stockpiles.
Recycle	Means a process where waste is reclaimed for further use, which process involves the separation of waste from a waste stream for further use and the processing of that separated material as a product or raw material
Re-use	Means the action or practice of using something again, whether for its original purpose (conventional reuse) or to fulfil a different function (creative reuse or repurposing)
Recovery	Means the controlled extraction or retrieval of any substance, material or object from waste
Specialist	Means a person that is generally recognised within the scientific community as having the capability of undertaking, in conformance with generally recognised scientific principles, specialist studies or preparing specialist reports, including due diligence studies and socio-economic studies
Storage	The accumulation of waste in a manner that does not constitute treatment or disposal of that waste.
Treatment	Means the biological, chemical, or mechanical method(s) employed to remove pollutants from industrial or municipal wastes, change the character and composition of medical waste, or reduce or eliminate its potential for harm to living beings and the environment.
Waste	<ul style="list-style-type: none"> a) any substance, material or object, that is unwanted, rejected, abandoned, discarded or disposed of, or that is intended or required to be discarded or disposed of, by the holder of that substance, material or object, whether or not such substance, material or object can be re-used, recycled or recovered and includes all wastes as defined in Schedule 3 to this Act; or b) any other substance, material or object that is not included in Schedule 3 that may be defined as a waste by the Minister by notice in the Gazette, but any waste or portion of waste, referred to in paragraphs (a) and (b), ceases to be a waste-

TERM	DEFINITION
	<ul style="list-style-type: none"> i. once an application for its re-use, recycling or recovery has been approved or, after such approval, once it is, or has been re-used, recycled or recovered; ii. where approval is not required, once a waste is, or has been re-used, recycled or recovered; iii. where the Minister has, in terms of section 74, exempted any waste or a portion of waste generated by a particular process from the definition of waste; or where the Minister has, in the prescribed manner, excluded any waste stream or a portion of a waste stream from the definition of waste.

I. SCOPING REPORT CONTENT IN ACCORDANCE WITH APPENDIX 2 OF GN 982

The table below summarises the requirements of the NEMA EIA Regulations (as amended) in terms of the content requirements of EIA reports (Appendix 2 of GNR 326) and the relevant sections in the report where these are addressed.

A Scoping Report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include:

GN R982, APPENDIX 2 CONTENT OF THE SCOPING REPORT		REFERENCE REPORT	IN
2 (a)	Details of:		
(2)(a)(i)	The EAP who prepared the report	Section 2.2 & Annexure A	
(2)(a)(ii)	The expertise of the EAP, including a Curriculum vitae	Section 2.2 & Annexure A	
(2)(b)	Location of the activity, including:	Section 3	
(2)(b)(i)	21-digit Surveyor General code of the property	Section 3.3	
2)(b)(ii)	Physical address and farm name (where available)	Section 3.1	
(2)(b)(iii)	The coordinates of the boundary of the property (Where (2) (b) (i) and (2) (b) (ii) are not applicable)	Section 3.4	
(2)(c)	A plan indicating the location of the proposed activity and associated infrastructure, or:	Section 3.4 & Annexure B	
(2)(c)(i)	For linear activities: a description and coordinates of the corridor in which the proposed activity is to be undertaken	N/A	
(2)(c)(ii)	On land where the property has not been defined, the coordinates within which the activity is to be undertaken	Section 3.4	
(2)(d)	A description of the scope of the proposed activity, including	Section 4	
(2)(d)(i)	All listed and specified activities triggered	Section 5.4.2	
(2)(d)(ii)	A description of activities to be undertaken, including associated infrastructure	Section 4.2	
(2)(e)	A description of the policy and legislative context	Section 5	

GN R982, APPENDIX 2 CONTENT OF THE SCOPING REPORT		REFERENCE IN REPORT
(2)(f)	Motivation for need and desirability for the proposed development	Section 6
(2)(g)	A full description of the process followed to reach the proposed preferred activity, site and	Section 7
(2)(g)(i)	Details of all alternatives considered	Section 7
(2)(g)(ii)	Details of public participation process undertaken, including copies of the supporting documents and inputs	Section 13 & Annexure C (Supporting documents to be included in FSR)
(2)(g)(iii)	A summary of the issues raised by interested and affected parties, and an indication of the manner in which these issues were incorporated	Not Yet Available Public Participation Process is still underway. To be included in FSR under Section 13 & Annexure C
(2)(g)(iv)	The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage, and cultural aspects	Section 8
(2)(g)(v)	The impacts and risks identified, including the nature, significance, consequence, extent, duration and probability	Section 9 & Section 10
(2)(g)(vi)	The methodology used in determining and ranking the nature, significance, consequences etc	Section 9
(2)(g)(vii)	Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected, focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects	Section 10
(2)(g)(viii)	Possible mitigation measures that could be applied and level of residual risk	Section 10
(2)(g)(ix)	Outcome of the site selection matrix	Section 7.2
(2)(g)(x)	If no alternative development locations for the activity were investigated, the motivation for not considering such	Section 7
(2)(g)(xi)	A concluding statement indicating the preferred alternatives including preferred location of the activity	Section 7.6

GN R982, APPENDIX 2 CONTENT OF THE SCOPING REPORT		REFERENCE REPORT	IN
(2)(h)	A plan of study for the EIA, including:		
(2)(h)	A description of the alternatives to be considered and assessed including the option of not proceeding with the activity	Section 7	
(2)(h)(ii)	A description of the aspects to be assessed as part of the environmental impact assessment process	Section 10.1	
(2)(h)(iii)	Aspects to be assessed by specialists	Section 11	
(2)(h)(iv)	A description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists	Section 11	
(2)(h)(v)	A description of the proposed method of assessing duration and significance	Section 9.1	
(2)(h)(vi)	An indication of the stages at which the competent authority will be consulted	Section 13.5	
(2)(h)(vii)	Particulars of the public participation process that will be conducted during the environmental impact assessment process	Section 13	
(2)(h)(viii)	A description of the tasks that will be undertaken as part of the environmental impact assessment process	Section 9	
(2)(h)(x)	Identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored	Section 10	
(2)(i)	Undertaking under oath or affirmation by the EAP in relation to:		
(2)(i)(i)	The correctness of the information provided in the report	Section 15	
(2)(i)(ii)	The inclusion of comments and inputs from stakeholders and interested and affected parties	Section 15	
2)(i)(iii)	Any information provided by the EAP to interested and affected parties and any responses by	Section 15	
(2)(j)	An undertaking under oath or affirmation by the EAP in relation to the level of agreement	Section 15	
(2)(k)	Any specific information required by the competent authority	Not Yet Applicable	
(2)(l)	Any other matter required in terms of Section 24(4) (a) and (b) of the Act	Not Applicable	

1. INTRODUCTION AND BACKGROUND

South Group Recycling (Pty) Ltd (“**South Group**”) operates a small-scale waste storage and transfer facility located in Montague Gardens Cape Town. Current operations specialise in the sourcing, transport and storage of both electronic waste (inclusive of PC boards, electronic boards, computers, phones, appliances and electronics) and spent catalytic convertors. Once received the material is subject to manual sorting before being repackaged and exported for further processing and refining. An application for registration in terms of the National Norms and Standards for the Storage of Waste (GN 921) as well as the National Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening, Chipping or Baling of General Waste (GN1093) has been submitted to the Department of Forestry, Fisheries and the Environment (“**DFFE**”) (**Annexure D**).

South Group reportedly undertakes no recycling, recovery or treatment activities at their Cape Town facility that would require licensing. Their intention is to now commence with these activities in addition to the storage and transfer operations already underway.

In recent years the electronic market has boomed, resulting in more electronic waste being generated than ever before. In response the need for responsible and sustainable management of electronic waste has increased. South Group want to capitalise on the opportunity and to increase their current exports. In order to undertake the planned recycling, recovery and treatment activities South Group will install relevant equipment such as horizontal crushers, hammer mills, vacuum filters, cone mixers and scientific ovens to assist in optimal processing of approved waste streams. South Group intend to modify their existing waste storage and transfer facility located at 2 Warbler Close, Montague Gardens, Cape Town to allow the processing of hazardous waste (e-waste and spent catalytic convertors).

All waste streams will be collected from clients and transported to the South Group, Cape Town facility where the load will be documented and weighed using a weighbridge or scale. Once the load has been cleared and accepted, the material will be offloaded into the sorting area to be manually sorted.

➤ **E-Waste**

- Once received, workers manually sort through each load, separating material according to grade.
- Once sorted, workers start to systematically dismantle the units or materials using basic tools such as screw drivers, pliers and wire cutters.
- Recovered materials are again sorted into different categories such as:
 - **Valuable parts:** Printed circuit boards, wires containing copper, and components with precious metals.
 - **Reusable materials:** Plastics, glass, and metals.
- Reusable materials may be subject to additional processing such as crushing and screening, depending on client specifications.

- Circuit boards, wires and or any components containing precious metals will be subject to additional crushing and screening.
 - In some cases, circuit boards are subject to low temperature heat treatment which aids in the weakening of bonds between materials making mechanical crushing easier and more efficient.
- Once crushed and screened, final product is collected in bulk bags and sealed for export.

➤ **Spent Catalytic Convertors**

- Spent Catalytic Convertors are received in bulk bags which are transported to the South Group, Cape Town facility via truck.
- Once received, workers manually sort through each load and pick out any unwanted or approved materials.
- The outer metal casing of the converter is removed, a process called "de-caning"
- The inner ceramic honeycomb substrate, which contains precious metals such as platinum, palladium, and rhodium, is extracted.
- The honeycomb is then crushed into a fine powder using mechanical crushers and grinding mills.
- The outer metal casings are collected in a skip or bulk bags and sold to local recyclers or scrap dealers.
- The fine powder generated from the crushing and milling process is collected in bulk bags, sealed and exported for further refining and processing.

1.1. Listed Activities Triggered

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

In terms of the NEMWA, waste management activities that are listed in regulations published under NEMWA may not be undertaken without a WML. The listed activities for which a WML is required are contained in Government Notice (GN) 921.

Category A of GN 921 states that;

"A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must conduct a Basic Assessment Process set out in the Environmental Impact Assessment Regulations made under Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as part of a waste management licence application contemplated in Section 45 read with Section 20(b) of this Act."

Category B of GN 921 states that;

"A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must conduct a Scoping and Environmental Impact Reporting Process set out in the Environmental

Impact Assessment Regulations made under Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as part of a waste management licence application contemplated in Section 45 read with Section 20(b) of this Act."

The proposed construction and operation of waste recycling, recovery and treatment activities to be undertaken by South Group, Cape Town will trigger the following activities listed under Category B of GN 921:

Table 2: NEMWA Listed Activities Triggered

GN 921 Listed Activity	Description
Category B Activity 2	The reuse or recycling of hazardous waste in excess of 1 ton per day, excluding reuse or recycling that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 3	The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 4	The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment
Category B Activity 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).

South Group Recycling, Cape Town must therefore undertake a full Scoping EIA process before commencement of the proposed project. The Competent Authority ("CA") for this application has been identified as the National Department of Forestry, Fisheries and the Environment ("DFFE").

➤ **National Environmental Management Act (No. 107 of 1998)**

The NEMA EIA Listing Notices 1, 2 and 3 were considered.

No development of infrastructure will take place and as waste activities are expressly excluded and to be authorised under the Waste Act, 59 of 2008. No NEMA authorisation is required. Therefore, it was determined that the NEMA EIA Listing Notices are not applicable, and an Environmental Authorisation ("EA") will not be required.

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

Listed activities and associated minimum emission standards identified in terms of Section 21 of the National Environmental Management Air Quality Act, 2004 (Act 39 of 2004) (“NEMAQA”) were considered, with none being applicable to the proposed waste management activities to be undertaken by South Group at their Cape Town facility

1.2. Scoping Report Terms of Reference

This document provides the scope of work associated with the application for a Waste Management License (WML) and the Full scoping EIA process that needs to be followed in order to obtain the required Authorisation for the proposed project.

It serves as a medium to inform and provide Interested and or Affected Parties (“IAPs”) with relevant information regarding the application process and proposed waste management activities to be undertaken by the applicant. Additionally, it will allow all I&APs to understand the intention of the applicant with regards to the proposed activities.

This Draft Scoping Report was drafted in line with the requirements set out under Appendix 2 of the NEMA EIA Regulations (GN 982), as amended. The objective of the scoping process is to, through a consultative process –

- a) *“identify the relevant policies and legislation relevant to the activity;*
- b) *motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;*
- c) *identify and confirm the preferred activity and technology alternative through an impact and risk assessment and ranking process;*
- d) *identify and confirm the preferred site, through a detailed site selection process, which includes an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment;*
- e) *identify the key issues to be addressed in the assessment phase;*
- f) *agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impacts to inform the location of the development footprint within the preferred site; and*
- g) *identify suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored.”*

As part of the Scoping Process, Public Participation must be undertaken. Public Participation consists of a series of inclusive and culturally appropriate interactions aimed at providing stakeholders with the opportunity to express their views, which will be considered and incorporated into the S&EIA decision-making process.

Effective public participation requires the prior disclosure of relevant and adequate project information to enable stakeholders to understand the risks, impacts, and opportunities associated with the proposed project. The objectives of the public participation process to be implemented in support of the scoping phase will include the following:

- Identify relevant individuals, organisations and member of community who may be interested in or affected by the South Group, Cape Town waste management activities and WML application.
- Clearly outline the scope of the proposed project, including the scale and nature of the existing and proposed activities.
- Identify viable alternatives that will assist the relevant authorities in making an informed decision.
- Identify shortcomings and gaps in existing information.
- Identify key concerns, raised by stakeholders that should be addressed in the subsequent specialist studies.
- Highlight the potential for environmental impacts, whether positive or negative, and
- Inform and provide the public with information and an understanding of the proposed project, issues and solutions.

1.3. Assumptions and Limitations

- The EAP confirms that they have undertaken to obtain project information from the applicant that is deemed to be accurate and representative of the proposed project.
- A site visit was undertaken to better understand the project and ensure that the information provided by the applicant is correct, based on site conditions observed.
- The EAP confirms their independence and understands the responsibility they hold in ensuring all comments received are accurately replicated and responded to within the EIA documentation, and
- The comments received in response to the public participation process, will be representative of comments from the broader community.

Notwithstanding these assumptions and limitations, it is the view of LexEco that this Scoping Report provides a good description of the issues associated with the proposed Project, and a reasonable plan of study for the EIA phase.

2. KEY ROLE PLAYERS

2.1. Details of the Applicant

Details of the Applicant and Responsible Contact Person are provided in **Table 1**.

Table 3: Applicant Details

Project Applicant:	<i>South Group Recycling (Pty) Ltd, Cape Town</i>
Trading Name:	South Group Recycling (Pty) Ltd, Cape Town
Contact person:	Wayne Gareth Clancy
Physical address:	Unit 2, Marconi Estate, 2 Warbler Cl, Montague Gardens, Cape Town, 7442
Postal address:	Unit 2, Marconi Estate, 2 Warbler Cl, Montague Gardens, Cape Town, 7442
Telephone:	071 761 7262
E-mail:	wayne@south-group.co.za

2.2. Details of the Environmental Assessment Practitioner

Details and expertise of the EAP who prepared the Scoping Report are provided in Table 2, and a copy of their Curriculum Vitae is appended in **Appendix A** of this report.

Appointed EAP:	<i>Ilke Degenaar Nel</i>
EAPASA Reg Nr:	2019/711
Tel:	072 679 6266
Email:	info@lexeco.co.za
Address:	11 Alice Lane, Building 3, 5 th Floor, Sandton, Johannesburg, 2196

2.3. Environmental Assessment Practitioners' Experience

Ilke Degenaar Nel is an experienced Environmental Consultant and Registered Environmental Assessment Practitioner with over 20 years' experience in environmental management. With an Honours degree in Environmental Management from the University of South Africa, Ilke is well equipped with a sound knowledge and understanding of the natural environment. Ilke has successfully led and completed several applications and projects, including Full Scoping EIA's and Basic Assessments under NEMA and NEMWA, Water Use License Applications, Integrated Water and Waste Management Plans (IWWMPs) development, and the implementation of Environmental Management Programmes. Ilke also has extensive experience in the leading of environmental audits, including Water Use Licenses, Air Emissions Licenses, Waste Management Licenses, Environmental Authorisations and Environmental Management Programmes. Her

skill base also extends into the practical fields as she is equipped to do a range of technical and design drawings and layouts using GIS software and AutoCAD.

Ilke was registered as a Professional Scientist with the South African Council for Natural Scientific Professions in 2020 (SACNASP Reg Nr: 119935) and also holds a valid registration as an Environmental Assessment Practitioner (EAP) with the Environmental Assessment Practitioners of South Africa (2019/711).

Refer to **Annexure A** of this report for a full copy of the EAP CV and EAPASA Registration Certificate.

2.4. Specialists Studies

The DFFE National Screening Tool was used to identify environmental sensitivities associated with the proposed project and to identify the need for specialist studies.

According to the DFFE National Screening Tool (**Annexure F**), the following environmental sensitivities were identified;

Table 4: National Screening Tool Site Sensitivities

Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agricultural Theme	x			
Animal Species Theme		x		
Aquatic Biodiversity Theme				x
Archaeological and Cultural Heritage Theme	x			
Civil Aviation Theme		x		
Defence Theme				x
Palaeontology Theme			x	
Plant Species Theme				x
Terrestrial Biodiversity Theme	x			

While the Screening Tool identified High sensitivities for certain themes, a site verification was undertaken by the Environmental Assessment Practitioner (EAP) to confirm actual site conditions and the nature of the proposed activities. The Screening Tool (**Annexure F**) provides a conservative, desktop-based assessment, and professional judgement is required to determine the applicability of the identified sensitivities to the specific site.

Based on the outcomes of the site verification assessment (**Annexure G**) undertaken by the appointed Environmental Assessment Practitioner, it was determined that no specialist studies will be required in support of this application. The exclusion of recommended specialist studies is based on the existing



transformed industrial land use, absence of natural features, and the confinement of all proposed activities to an existing warehouse footprint.

2.4.1. Specialist Studies

In line with regulatory requirements, the Environmental Assessment Practitioner (EAP) has reviewed the Screening Tool outputs and undertaken a site verification to confirm actual on-site conditions and the nature of the proposed activities. While the Screening Tool provides a conservative, desktop-based assessment, the EAP is required to apply professional judgement to determine the applicability of the identified sensitivities to the specific site and project.

The table below provides a detailed motivation for the exclusion of the specialist studies identified by the National Screening Tool, supported by site-specific observations, the existing land use, the absence of natural features, and the fact that all proposed activities will be confined to an existing, fully transformed industrial footprint.

Table 5: Motivation for Exclusion of Specialist Studies Identified by the National Screening

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
<p>Agricultural Impact Assessment</p>	<p>The South Group, Cape Town operations are located within a pre-existing warehouse which forms part an established industrial area.</p> <p>The existing warehouse will continue to be used in its current state. Installation of the equipment needed to undertake the proposed recycling, recovery and treatment of electronic waste and spent catalytic convertors will not require any alterations, extensions or additional development. No land clearance, soil disturbance or development beyond the footprint of the existing warehouse will be required.</p> <p>No agricultural activity or development remains present on site. As such, no direct or indirect impacts on the area’s agricultural operations are anticipated.</p> <p>No specialist impact assessments will therefore be undertaken other than the Impact Assessment during the EIR phase of this application. All aspects and impacts identified will be addressed by recommending relevant mitigation measures. All mitigation measures will be aimed at reducing the risk of the identified impact and will be incorporated into an Environmental Management Programme (EMPr) to be approved by the Competent Authority.</p>	<p>Refer to Section 8.7.1, Figure 9 for an aerial view of the site and surroundings and Figure 11 for a map indicating relevant surrounding land use. Also refer to Figure 10 for a map showing the property zoning based on the 2026 City of Cape Town’s Spatial Development Farmwork, which confirms the sites Industrial Zoning status.</p> <p>Also refer to Annexure H of this report for site photos showing the extent and status of ongoing industrial activities on site.</p> <p>A full copy of the site verification report is also attached to this report under Annexure G.</p>

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Terrestrial Biodiversity Impact Assessment	The South Group, Cape Town operations are located within a pre-existing warehouse which is located in an established industrial area with no natural vegetation remaining.	Refer to Section 8.7.1, Figure 9 for an aerial view of the site and surroundings and Figure 11 for a map indicating relevant surrounding land use. Also refer to Figure 10 for a map showing the site's zoning based on the 2026 City of Cape Towns' Spatial Development Farmwork, which confirms the sites Industrial Zoning status.
Plant Species Assessment	The existing warehouse will continue to be used in its current state. Installation of the equipment needed to undertake the proposed recycling, recovery and treatment of electronic waste and spent catalytic convertors will not require any alterations or extension to the warehouse or industrial property's footprint. No development requiring the clearance of land or removal of natural vegetation will be required, thus avoiding any impact on natural vegetation, animal species and overall terrestrial biodiversity in the area.	Also refer to Annexure H of this report for site photos showing the extent and status of ongoing industrial activities on site.
Animal Species Assessment	No impacts on terrestrial biodiversity, animal species or plant species are anticipated. No specialist assessments in terms of terrestrial Biodiversity, Plant Species or Animal Species will therefore be undertaken.	The potential presence of identified terrestrial species such as the Westcoast Flightless Dung Beetle, Peringuey's Meadow Katydid, or the bladder grasshopper is considered to be low. Industrialisation and overall development of the area has resulted in widespread loss of indigenous vegetation and supporting habitat which support the occurrence of the identified species. Refer to Annexure G for a full copy of the site verification report.
Archaeological and Cultural Heritage Impact Assessment	The proposed waste management activities to be undertaken by South Group, Cape Town will not have any impact on the regions archaeological, palaeontological or cultural heritage resources. Operations will be housed within an existing warehouse, in an	The South Group, Cape Town operations are located in the Montague Gardens area which according to the South African Heritage and Resource Information System ("SAHRIS") (https://sahris.org.za/nhsmmap) does not include any registered

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Palaeontological Impact Assessment	established and industrially zoned area. No extension or alteration to the building and or operational footprint will be required, avoiding land disturbance all together.	heritage, archaeological or paleontological sites within a 5 km radius. Refer to Section 3.4 of Annexure G (Site Verification Report) of this report. Also refer to Annexure H of this report for site photos.
Aquatic Biodiversity Impact Assessment	<p>No natural water resources are located on or within direct vicinity to the project site. Lack of any naturally occurring water resources on site limit the potential for aquatic biodiversity.</p> <p>The proposed waste management activities to be undertaken by South Group Recycling, Cape Town will not have any impacts on the receiving environment in terms of aquatic biodiversity or naturally occurring water resources.</p> <p>No specialist assessment in terms of Aquatic Biodiversity will be undertaken.</p>	<p>The National Screening Tool did yield a low sensitivity towards the Aquatic Biodiversity Theme (Annexure F). The low sensitivity rating in combination with the lack of any water resources on site support the conclusion not to undertake an aquatic biodiversity assessment. Refer to Annexure H for site photos and Annexure G for a full copy of the site verification report.</p>
Hydrology Assessment	<p>The proposed waste manages activities to be undertaken by South Group, Cape Town will be limited to the boundaries of the existing warehouse located on concreted surfaces within an existing warehouse which forms part of an existing industrial area. No construction, earthworks, site clearing, or expansion of the existing footprint is planned or will be required. No alteration to existing drainage patterns, runoff volumes, or infiltration characteristics of the site will occur or be impacted in any way. The warehouse and</p>	<p>Refer to Annexure H for site photos showing the current status of the site and Annexure G for a full copy of the site verification report. The National Screening Tool did yield a low sensitivity towards the Aquatic Biodiversity Theme. The low sensitivity rating in combination with the lack of any water resources on site support the conclusion not to undertake an aquatic biodiversity assessment</p>

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
	<p>associated site are equipped with an existing, engineered stormwater drainage system that is designed to manage runoff from the developed site. Stormwater is conveyed via formal infrastructure to the municipal/industrial stormwater network. No modifications to the stormwater system will be required.</p> <p>No natural hydrological features such as rivers, wetlands, floodplains, or drainage lines are present on site or within direct vicinity to the warehouse and or industrial property. The proposed site as well as local receiving environment is therefore not considered hydrologically sensitive.</p> <p>No impact to the areas hydrological status us therefore anticipated. No hydrological assessment will therefore be undertaken.</p>	
Noise Impact Assessment	<p>Based on the industrial setting of the site, the nature of the proposed activity, and the lack of sensitive receptors, the potential for significant noise impacts is negligible. The undertaking of a Noise Impact Assessment is therefore, in the opinion of the EAP, not required.</p> <p>Potential noise impacts will be assessed as part of the impact assessment process. Relevant mitigation measures will be assigned and are to be included in the EMPr which will be subject to approval by the Competent Authority.</p>	<p>Refer to Annexure H of this report for site photos showing the extent and status of current industrial operations and Figure 10 of this report confirming the property and area zoning as General Industrial.</p>

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Traffic Impact Assessment	Given the industrial context of the site, the use of existing infrastructure, and the absence of any significant increase in traffic volumes or changes to access arrangements, traffic-related impacts are expected to be low. It is therefore concluded that a Traffic Impact Assessment will not be required. Potential traffic impacts will be addressed through standard operational management measures included in the EMPr.	Potential traffic impacts will be addressed through standard operational management measures included in the EMPr which will be developed during the EIR Phase
Health Impact Assessment	The proposed site selected for the waste management activities is located within an established industrial, area. The scale of the operation in relation to the area is however considered to be small. Although sustainable employment, skill development and potentially new employment opportunities may be generated the overall impact,	No specialist assessments in terms of health and or socio-economic impacts will be undertaken.

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Socio-Economic Assessment	<p>even if positive will be low. Undertaking a full scope Socio-Economic Impact Assessment will therefore not be undertaken.</p> <p>The South Group operations are managed in line with requirements set out by the National Occupational Health and Safety Act which is aimed at limiting possible health impacts on employees. Operations will be contained to a warehouse structure and will be located on concreted surfaces. Based on the nature of the proposed activity, its location within an established industrial area, and the absence of significant emissions or exposure pathways, potential impacts on human health are expected to be negligible. The undertaking of a Health Impact Assessment, in the opinion of the EAP is therefore not required.</p>	
Ambient Air Quality Impact Assessment	<p>Since South Group propose to undertake the planned recycling, recovery and treatment activities within an existing warehouse, no additional construction will be required. No earth moving or surface area clearance will be required. Operations will be undertaken within the warehouse structure, limiting potential emissions to the ambient atmosphere. Crushing and screening operations will be undertaken under suited vacuum filters which will act as abatement prior to the release of possible PM emissions during operation. The only other impact anticipated would be from vehicle emissions associated with the transport of materials and product.</p>	<p>Potential air quality impacts will be assessed as part of the impact assessment process. Relevant mitigation measures will be assigned and are to be included in the EMPr which will be subject to approval by the Competent Authority.</p>



Based on the outcomes of the site verification and the assessment of the proposed project site, the EAP is of the opinion that no specialist assessments are required. The proposed site selected for the planned recycling, recovery and treatment activities is already developed and is located within an industrially zoned area. The site is completely developed with concreted or paved surfaces and established warehouses. No natural vegetation remains, limiting the presence of terrestrial biodiversity. The existing warehouse selected for the proposed project will continue to be used. No alterations, extensions or additional construction requiring groundwork or surface area clearance will be required. All operations will be housed under the cover of the warehouse. No waste will come into contact with stormwater, nor will any freshwater intake be required, thus avoiding the generation of industrial effluent. Surface water drainage patterns will not be affected by the operations as no modification to the industrial property will be made.

Relevant impacts associated with the proposed project will be assessed as part of the EIA phase and relevant mitigation measures incorporated in the EMPr.

Refer to **Annexure G** of this report for a copy of the site verification assessment, inclusive of inclusive of site photos.

3. PROPERTY DESCRIPTION AND SITE LOCATION

This section contains details of the property at which the existing operations are located.

3.1. Property Details

South Group currently operates an existing waste storage and transfer station, located in Unit 3 of the Marconi Estate, located at 2 Warbler Close, Montague Gardens in the Northern suburbs of Cape Town.

Physical Address:	Unit 3 at 2 Warbler Close, Montague Gardens, Cape Town
Property Name(s):	Erf 20674 in Milnerton, Cape Town

3.2. Property Zoning

The site is zoned as Industrial which is in line with the existing operations of the waste storage and transfer operations undertaken by South Group, Cape Town. The surrounding land use is also industrial in nature.

3.3. Surveyor General Code

C	0	1	6	0	0	3	4	0	0	0	2	0	6	7	3	0	0	0	0
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3.4. Site Location

The area surrounding operation comprises of many warehouses and large format stores and distribution centres.

South Group, Cape Town is located within an established warehouse, equipped to house the current waste storage and transfer activities as well as the planned waste recycling, recovery and treatment activities.

The site is ideally situated to allow easy access to local and regional roads such as the M87, M5, R27 and N7 highway. The site is located approximately 15 km from Cape Town CBD, 15 km from the Port of Cape Town, and 20 km from Cape Town International Airport.

Neighbouring suburbs include Milnerton Ridge, Milnerton, Edgemoor, Bothasig, and Summer Greens.

Refer to Table 5 below for the coordinates of the site.

Table 6: Site Coordinates

CORNER	LATITUDE	LONGITUDE
A	33°51'58.89"S	18°30'48.94"E
B	33°52'0.08"S	18°30'49.31"E
C	33°52'0.26"S	18°30'48.57"E
D	33°51'59.13"S	18°30'48.17"E

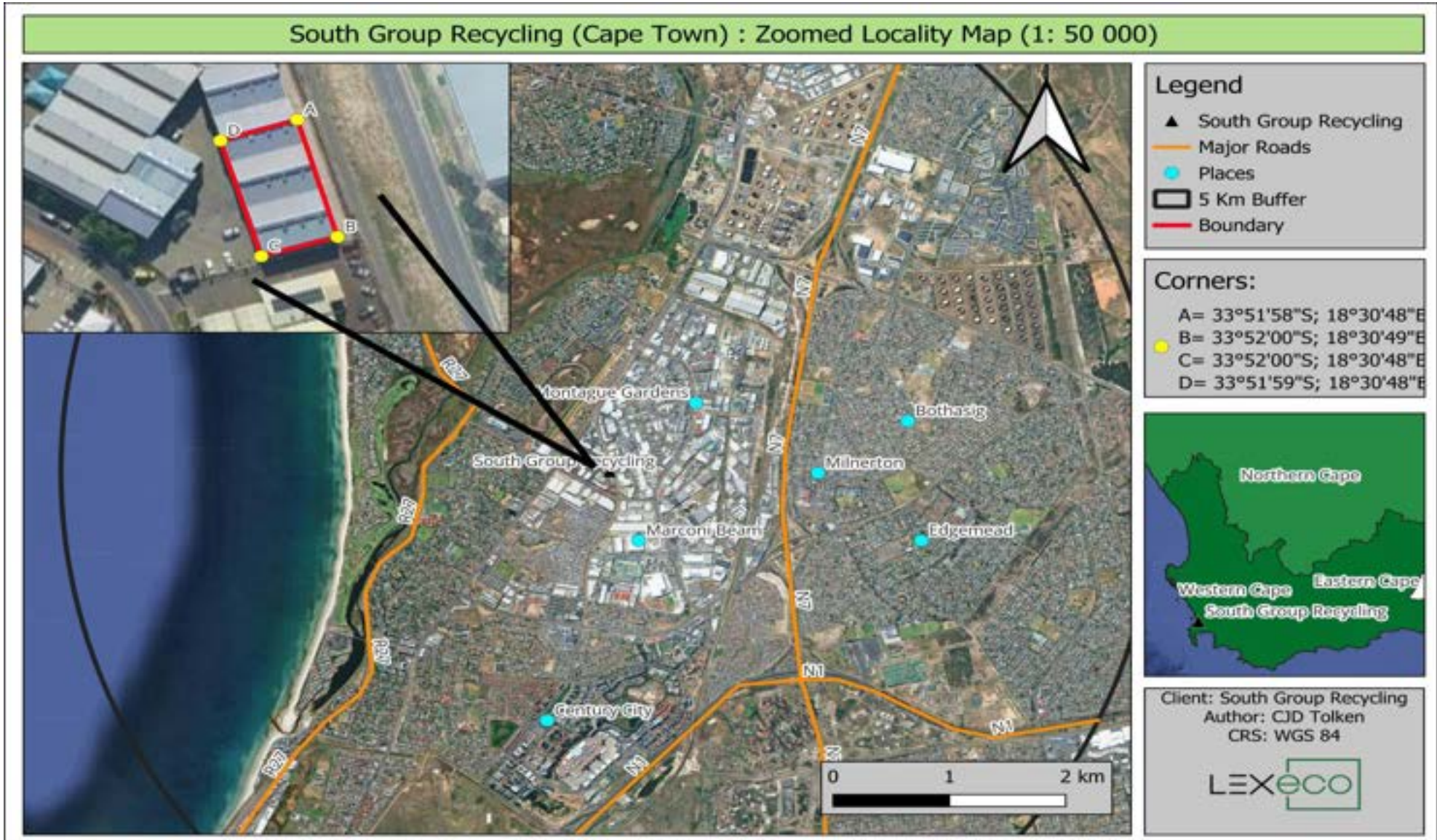


Figure 1: South Group, Cape Town Zoomed Locality



Figure 2: South Group, Cape Town Locality Map (1:50 000)



4. PROCESS DESCRIPTION

4.1. Existing Operations

South Group Recycling (Pty) Ltd (“**South Group**”) operates a small-scale waste storage and transfer facility located in Montague Gardens, Cape Town. Current operations specialise in the sourcing, transport and storage of both electronic waste (inclusive of PC boards, electronic boards, computers, phones, appliances and electronics) and spent catalytic converters. Once received the material is subject to manual sorting before being repackaged and exported for further processing and refining.

South Group reportedly undertakes no recycling, recovery or treatment activities at their Cape Town facility that would require licensing. Their intention is to now commence with these activities in addition to the storage and transfer operations already underway.

4.2. Proposed Activities

In recent years the electronic market has boomed, resulting in more electronic waste being generated than ever before. In response the need for responsible and sustainable management of electronic waste has increased. South Group want to capitalise on the opportunity and to increase their current exports. In order to undertake the planned recycling, recovery and treatment activities South Group will install relevant equipment such as horizontal crushers, hammer mills, vacuum filters, cone mixers and scientific ovens to assist in optimal processing of approved waste streams. South Group intend to modify their existing waste storage and transfer facility located at 2 Warbler Close, Montague Gardens, Cape Town to allow the processing of hazardous waste (e-waste and spent catalytic converters).

All waste streams will be collected from clients and transported to the South Group, Cape Town facility where the load will be documented and weighed using a weighbridge or scale. Once the load has been cleared and accepted, the material will be offloaded into the sorting area to be manually sorted.

➤ **E-Waste**

- Once received, workers manually sort through each load, separating material according to grade.
- Once sorted, workers start to systematically dismantle the units or materials using basic tools such as screw drivers, pliers and wire cutters.
- Recovered materials are again sorted into different categories such as:
 - **Valuable parts:** Printed circuit boards, wires containing copper, and components with precious metals.
 - **Reusable materials:** Plastics, glass, and metals.
- Reusable materials may be subject to additional processing such as crushing and screening, depending on client specifications.

- Circuit boards, wires and or any components containing precious metals will be subject to additional crushing and screening.
 - In some cases, circuit boards are subject to low temperature heat treatment which aids in the weakening of bonds between materials making mechanical crushing easier and more efficient.
- Once crushed and screened, final product is collected in bulk bags and sealed for export.

➤ **Spent Catalytic Convertors**

- Spent Catalytic Convertors are received in bulk bags which are transported to the South Group, Cape Town facility via truck.
- Once received, workers manually sort through each load and pick out any unwanted or approved materials.
- The outer metal casing of the converter is removed, a process called "*de-caning*".
- The inner ceramic honeycomb substrate, which contains precious metals such as platinum, palladium, and rhodium, is extracted.
- The honeycomb is then crushed into a fine powder using mechanical crushers and grinding mills.
- The outer metal casings are collected in a skip or bulk bags and sold to local recyclers or scrap dealers.
- The fine powder generated from the crushing and milling process is collected in bulk bags, sealed and exported for further refining and processing.

4.3. Existing Infrastructure Associated with the Site

➤ **Roads**

Access to the facility is gained via Warbler CI Road which links up to Longclaw Drive. The M87 runs parallel to the warehouse property's eastern boundary but does not provide direct access to the site.

➤ **Security**

The warehouse which currently houses the South Group operations is located within an established industrial complex which is completely fenced to a minimum height of 1.8 m. Access to the property can only be gained via a security gate which is manned by security personnel. No unauthorised access is permitted.

➤ **Access Gates**

An established access gate guarded by security personnel controls all traffic entering and leaving the facility.

➤ **Existing Infrastructure**

The operational surface area of the site is concreted. The entire operation currently undertaken by South Group is housed within a single warehouse with a single entrance.

The inside of the warehouse is mainly open concept with areas dedicated to specific activities such as manual sorting and picking, packaging and storage. Material is mainly packaged and stored in bulk bags in which material is received and then dispatched in. Workstations consisting of work surfaces are also present which are used by employees for manual sorting and picking of e-waste.

Spent catalytic converters are also accepted. Once received, they are de-canned and the inner ceramic honeycomb substrate, which contains precious metals such as platinum, palladium, and rhodium, is extracted and crushed into a powder. The powder is then collected and sealed in bulk bags before being diverted to the storage area prior to export.

The outer metal casings are collected in a skip or bulk bags and sold to local recyclers or scrap dealers.

➤ **Storm Water Management**

Rainwater is captured during raining events by means of gutters, drains and canals which divert clean storm water away from the warehouse toward the municipal storm water drains. Storm water infrastructure is existing. No additional measures are required at this time.

➤ **Electricity**

Municipal electricity is to be used as a source to supply the facility with electricity.

➤ **Water Supply and Use**

No water will be used in the industrial process. The only water use associated with the existing as well as proposed operations will be limited to domestic purposes which in turn will rely on existing municipal supplies and infrastructure.

➤ **Waste management**

Due to the nature of the operations, low amounts of waste are anticipated to be generated.

All waste generated from the site office, inclusive of paper, food packaging and plastic will be collected by municipal services for landfill disposal on a regular basis.

The metallic casings generated from the de-canning of spent catalytic convertors will be collected in allocated bins, skips or bulk bags and diverted to local scrap dealers with the aim of recycling. All electronic waste will be subject to manual sorting and picking before recycling and treatment. The undertaking in itself will break down the material to small fractions which is collected as a whole and exported to international markets for refining and finally precious metal recovery.

5. LEGISLATIVE CONTEXT

5.1. Constitution of the Republic of South Africa (Act 108 of 1996)

➤ Section 24 – Environment

“Everyone has the right -

- a) to an environment that is not harmful to their health or well-being; and*
- b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that-*
 - i. prevent pollution and ecological degradation;*
 - ii. promote conservation; and*
 - iii. secure ecologically sustainable development and use of natural resources while*
 - iv. promoting justifiable economic and social development”*

The facility must be managed to prevent adverse environmental consequences and to meet the constitutional requirements.

5.2. National Environmental Management Act (No. 107 of 1998), as amended

The National Environmental Management Act, 107 of 1998 (“**NEMA**”) NEMA is the framework legislation in South Africa that governs environmental management.

➤ Section 2: Environmental Management Principles

“Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.”

➤ Section 24: Prohibitions Relating to Commencement of Constitution of Listed Activity

No person may commence with an activity listed or specified in terms of Section 24(2)(a) unless the competent authority or the Minister or Minerals and Energy, as the case may be, has granted an

environmental authorisation for the activity. An activity may only commence and continue of the said activity listed in terms of Section 2A(2)(d) if the activity is undertaken in terms of an applicable norm and standard.

➤ **Section 28: Duty of Care and Remediation of Environmental Damage**

Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.

5.3. NEMA EIA Regulations (GNR 982) (as amended)

These regulations prescribe the process that needs to be followed in the EIA process, including the relevant timeframes and requirements for the public participation process. It also stipulates specific requirement for the reports that must be generated as part of the EIA process, including the Scoping Report.

NEMA listed activities require prior environmental authorisation prior to commencement. Applications for prior authorisation must include the results of, either:

- A basic assessment (i.e., short EIA process).
- A Scoping and Environmental Impact Assessment Report (EIR) (longer EIA process).

The type of activity determines which of the processes must be followed.

The legal requirement for EIA's has existed in legislation since the late 1980s but was only activated through regulation in the late 1990s. Since then, a series of legal regimes have been implemented, all of which required an EIA for authorisation of a listed activity. The most recent iteration of the EIA legal regime includes various regulations (set out in NEMA and in GN 982 dated 4th December 2014) (NEMA EIA 2014 regulations) (as amended).

The NEMA EIA 2014 Regulations and their listing notices replace the EIA regulations of 2010 and their listing notices. Three listing notices were published in conjunction with the new regulations, including -

1. **Listing Notice 1** (Government Notice R. 983 in Government Gazette 38282 of 4 December 2014) which sets out the activities that require a basic assessment. Typically, these are activities that have the potential to impact negatively on the environment. However, due to the nature and scale of these activities, these impacts are generally known.

2. **Listing Notice 2** (Government Notice R. 984 in Government Gazette 38282 of 4 December 2014) which sets out the activities that require both a Scoping and Environmental Impact Assessment Report. Typically, these are large scale or highly polluting activities, and the full range of potential impacts must be established through a scoping exercise before the activity begins.
3. **Listing Notice 3** (Government Notice R. 985 in Government Gazette 38282 of 4 December 2014) which identifies activities that will only require an environmental authorisation through a basic assessment process if the activity is one of the specified geographical areas indicated in the listing notice.

No development of infrastructure will take place and as waste activities are expressly excluded and to be authorised under the Waste Act, 59 of 2008. Therefore, it was determined that the NEMA EIA Listing Notices are not applicable, and an Environmental Authorisation ("EA") will not be required.

5.3.1. Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (GNR 320)

The procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation ("**Protocols**") provide the minimum content required for specialist assessment and or site sensitivity verification reports in respect of various environmental themes.

The protocols replace the requirements of Appendix 6 (Specialist Reports) of the EIA Regulations, 2014, as amended.

The assessment and reporting requirements of the protocols are associated with a level of environmental sensitivity identified by the National Web Based Environmental Screening Tool ("**Screening Tool**"). The Screening Tool was used, and a Screening Report was generated for the proposed project. The following environmental themes are applicable to the proposed South Group, Cape Town facility;

- Agricultural Theme – *Medium*
- Animal Species Theme – *Medium*
- Aquatic Biodiversity Theme – *Low*
- Archaeological and Cultural Heritage Theme – *Low*
- Civil Aviation Theme – *High*
- Defence Theme – *Very High*
- Palaeontology Theme – *Low*
- Plant Species Theme – *Low*
- Terrestrial Biodiversity Theme – *Very high*



Based on the outcomes of the site verification, the EAP is of the opinion that no specialist assessments are required. Refer to **Section 8.7** of this report for a full discussion and outcomes based on the site verification.

5.4. National Environmental Management Waste Act (No. 59 of 2008) (as amended)

This section provides the legal framework for the management of general and hazardous waste in South Africa to protect health, wellbeing and the environment by providing reasonable measures for waste management.

5.4.1. National Waste Information Regulations (13 August 2012)

The purpose of these Regulations is to regulate the collection of data and information to fulfil the objectives of the national waste information system. The facility needs to report the details of the waste recovered, recycled and treated.

South Group Recycling, Cape Town will apply for registration on the Integrated Pollutant and Waste Information System ("iPWIS") as a waste recycling facility once the recycling, recovery and treatment activities are approved for commencement.

5.4.2. NEMWA Listed Activities

In terms of the NEMWA, waste management activities that are listed in regulations published under NEMWA may not be undertaken without a WML. The listed activities for which a WML is required are contained in Government Notice (GN) 921.

Category A of GN 921 states that;

"A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must conduct a Basic Assessment Process set out in the Environmental Impact Assessment Regulations made under Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as part of a waste management licence application contemplated in Section 45 read with Section 20(b) of this Act."

Category B of GN 921 states that;

"A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must conduct a Scoping and Environmental Impact Reporting Process set out in the Environmental Impact Assessment Regulations made under Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) as part of a waste management licence application contemplated in Section 45 read with Section 20(b) of this Act."

➤ Listed Activities Triggered

The proposed construction and operation of waste recycling, recovery and treatment activities to be undertaken by South Group Cape Town will trigger the following activities listed under Category B of GN 921:

Table 7: NEMWA Listed Activities Triggered

GN 921 Listed Activity	Description
Category B Activity 2	The reuse or recycling of hazardous waste in excess of 1 ton per day, excluding reuse or recycling that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 3	The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 4	The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment
Category B Activity 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).

South Group Recycling, Cape Town must therefore undertake a full Scoping EIA process before commencement of the proposed project. The Competent Authority ("CA") for this application has been identified as the National Department of Forestry, Fisheries and the Environment ("DFFE").

5.4.3. National Norms and Standards

In addition to the activities triggered in terms of Category B of GN 921, the ongoing storage, sorting and screening of waste also triggers activities listed under Category C of GN 921 which states that;

"A person who wishes to commence, undertake or conduct a waste management activity listed under this Category, must comply with the relevant requirements or standards determined by the Minister."

➤ GN 921 - Category C

Storage of Waste

- 1) *"The storage of general waste at a facility that has the capacity to store in excess of 100m³ of general waste at any one time, excluding the storage of waste in lagoons or temporary storage of such waste."*

- 2) *"The storage of hazardous waste at a facility that has the capacity to store in excess of 80m³ of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or temporary storage of such waste."*

Recycling or Recovery of Waste

- 6) *"The sorting, shredding, grinding, crushing, screening or baling of general waste at a waste facility that has an operational area that is 1000 m² and more."*

An application for the registration of the South Group Recycling, Cape Town facility was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) as competent authority for the Storage of Waste (GN 926) as well as the Sorting, Shredding, Grinding, Crushing, Screening or Baling of General Waste (GN 1093) (refer to **Annexure D**).

5.4.4. NEMWA Regulations Regarding the Control of the Import and Export of Waste (GNR 42175)

The South Group E-waste operations is an existing operation which collects, sorts, stores and exports e-waste and spent catalytic convertors to the overseas market, where refining and recovery of precious metals takes place. Exporting currently takes place via air and/ or sea. South Group has an export certificate in place in terms of this regulation. Refer to **Annexure E**.

5.4.5. Basel Convention on the Control of Trans-boundary Movements of Hazardous Waste (22 March 1989)

The overarching objective of the Basel Convention is to protect human health and the environment against the adverse effects of hazardous waste with a specific scope that covers the trans-boundary movement thereof. Applicable to the control of trans-boundary movements of hazardous waste from one country to another.

The South Group Recycling group currently exports e-waste and spent catalytic convertors to the overseas market, where refining and recovery of precious metals takes place. South Group has an export certificate in place in terms of this regulation. Refer to **Annexure E**.



5.4.6. Draft National Policy for the Management of Waste Electrical and Electronic Equipment (GNR 4983, 2024)

This draft national policy is designed to be a robust, integrative, harmonising and comprehensive framework for the sustainable management of all types of e-waste. The aim of this draft policy is to ensure the efficient, equitable, inclusive and financially sustainable management of the e-waste to ensure that it is safe for the environment, protects human health and further circular economy principles.

The South Group Recycling, Cape Town will operate within the requirements of the draft framework.

5.4.7. National Waste Management Strategy (NWMS) 2020

The National Waste Management Strategy provides a coherent framework and strategy for the implementation of NEMWA and outlines government's policy and strategic approach to waste management within the South African government's context and agenda of socio-economic development that is "equitable, inclusive, sustainable and environmentally sound".

In terms of the NWMS and the hierarchy of waste management practices, waste prevention interventions have the highest priority and should be the first to be applied to any waste stream. Waste prevention involves interventions designed to avoid and reduce waste before substances, materials and products are discarded i.e. before they finally become waste. Therefore, the strategy focuses on implementing the waste management strategies with the ultimate aim of diverting waste from landfill.

The foundation of the hierarchy is the avoidance and reduction of waste generation, followed by the re-use of waste which involves the separation of articles from the waste stream and processing them as products or raw materials. The last option is to treat and dispose of waste.



Figure 3: Waste Hierarchy

The operations of South Group Recycling are considered to be in support of the waste hierarchy and National Waste Management Strategy for South Africa. Continued operation of the South Group Recycling, Cape Town operations will positively contribute to waste reduction and the avoidance of waste disposal to landfill.

5.5. National Environmental Management: Air Quality Act (Act 39 of 2004) (“NEMAQA”)

Up to 2004, South Africa’s approach to air pollution control was driven by the Atmospheric Pollution Prevention Act 45 of 1965 (APPA) which was repealed with the promulgation of NEMAQA . NEMAQA represents a shift in South Africa’s approach to air quality management, from source-based control to integrated effects-based management.

The objectives of NEM:AQA are to:

- Protect the environment by providing reasonable measures for:
 - The prevention of air pollution and ecological degradation.
 - Securing ecologically sustainable development while promoting justifiable economic and social development.
 - Giving effect to everyone’s right *“to an environment that is not harmful to their health and well-being.”*



Significant functions detailed in NEMAQA include:

- The National Framework for Air Quality Management.

Institutional planning matters, including:

- The establishment of a National Air Quality Advisory Committee.
- The appointment of Air Quality Officers (AQOs) at each level of government.
- The development, implementation and reporting of Air Quality Management
- Development of Air Quality Management Plans (AQMP) at national, provincial and municipal levels.

Air quality management measures including: The declaration of Priority Areas where ambient air quality standards are being, or may be, exceeded.

- The listing of activities that result in atmospheric emissions and which have the potential to impact negatively on the environment and the licensing thereof through an Atmospheric Emissions License (AEL).
- The declaration of Controlled Emitters.
- The declaration of Controlled Fuels.
- Procedures to enforce Pollution Prevention Plans or Atmospheric Impact Reporting for the control and inventory of atmospheric pollutants of concern.
- Requirements for addressing dust and offensive odours.

In terms of Section 9 of the NEMAQA, the Minister identified substances in the ambient air that are believed to present a threat to the health, well-being or the environment and has in respect of those substances, established national standards for ambient air quality. These standards provide the permissible amount or concentration of each of the substances in ambient air. The Standards contain the averaging periods, concentrations, frequencies of exceedance, compliance dates and reference methods for Sulphur dioxide, Nitrogen dioxide, Particulate Matter, Ozone, Benzene, Lead and Carbon monoxide.

The NEMAQA defines ambient air to exclude air regulated by the Occupational Health and Safety Act (No. 85 of 1993). The implication of this definition is that all impacts on air quality not forming part of the occupational health and safety monitoring must be monitored.

The South Gorup Recycling, Cape Town proposed waste management activities were assessed in terms GN 893, (Listed Activities and Associated Minimum Emission Standards Identified in terms of Section 21 of NEMAQA). In conclusion it was determined that the proposed waste management activities will not trigger any activities listed in terms of NEMAQA.

The principles of the NEMAQA, focusing on minimisation of pollutant emissions will however be taken into consideration in the development of the facility's EMPr.

5.6. National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)

The National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA) was promulgated in June 2004 within the framework of NEMA to provide for the management and conservation of national biodiversity. The NEMBA's primary aims are for the protection of species and ecosystems that warrant national protection, the sustainable use of indigenous biological resources, the fair and equitable sharing of benefits arising from bioprospecting involving indigenous biological resources. In addition, the NEMBA provides for the establishment and functions of a South African National Biodiversity Institute (SANBI).

The site is existing and does not require the clearance of vegetation and will not impact biodiversity.

5.7. The National Water Act (No. 36 Of 1998)

The National Water Act, 1998 (Act No. 36 of 1998) (NWA) provides the framework to protect water resources against over exploitation and to ensure that there is water for social and economic development, human needs and to meet the needs of the aquatic environment.

The Act defines water source to include watercourses, surface water, estuary or aquifer.

A watercourse is defined in the Act as a river or spring, a natural channel in which water flows regularly or intermittently, a wetland, lake or dam into which or from which water flows, and any collection of water that the Minister may declare a watercourse.

Section 21 of the Act outlines a number of categories that require a water user to apply for a Water Use License (WUL) and Section 22 requires water users to apply for a General Authorisation (GA) with the Department of Water and Sanitation (DWS) if they are under certain thresholds or meet certain criteria. The list of water uses in terms of Section 21 of the NWA include:

- Section 21 (a) Taking water from a water resource.
- Section 21 (c) Impeding or diverting the flow of water in a watercourse.
- Section 21 (g) Disposing of waste in a manner which may detrimentally impact on a water resource.
- Section 21 (i) Altering the bed, banks, course or characteristics of a watercourse.
- Section 21 (f) discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit.
- The South Group E-waste operations do not trigger any water uses in terms of the NWA.

The proposed waste management activities to be undertaken and implemented by South Group Recycling, Cape Town will not trigger any of the listed water use activities which would require licensing or authorisation. Water use for the facility will only be linked to domestic use which will be reliant on the existing municipal line.

5.8. The National Heritage Resources Act (No. 25 Of 1999)

The *National Heritage Resource Act (Act No. 25 of 1999)* (NHRA) serves to protect national and provincial heritage resources across South Africa. The NHRA provides for the protection of all archaeological and palaeontological sites, the conservation and care of cemeteries and graves by the South African Heritage Resources Agency (SAHRA) and lists activities that require any person who intends to undertake to notify the responsible heritage resources agency and furnish details regarding the location, nature, and extent of the proposed development.

Part 2 of the NHRA details specific activities that require a Heritage Impact Assessment (HIA) that will need to be approved by SAHRA. Parts of Section 35, 36 and 38 apply to the proposed Project, principally:

- Section 35 (4) - No person may, without a permit issued by the responsible heritage resources authority destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
 - destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite.
 - Section 38 (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as any development or other activity which will change the character of a site— (i) exceeding 5 000 m² in extent, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

In terms of Section 38(8), approval from the heritage authority is not required if an evaluation of the impact of such development on heritage resources is required in terms of any other legislation (such as NEMA), provided that the consenting authority ensures that the evaluation of impacts fulfils the requirements of the relevant heritage resources authority in terms of Section 38(3) and any comments and recommendations of the relevant resources authority with regard to such development have been taken into account prior to the granting of the consent.

The DFFE Screening Tool Report results shows that the site is of low sensitivity in terms of heritage and cultural importance. The South Group, Cape Town operations are currently housed within an existing warehouse which will continue to be used for the proposed waste management activities applied for. The

warehouse was assessed and found to be sufficiently located and structurally sound with enough space to house the planned operations if approved. No extensions or additional construction will be required. The warehouse and property are zoned for industrial use which is also in line with surrounding land uses in the Montague Gardens area. Should this application be approved, the undertaking of the proposed waste management activities will not have any impact on localised heritage resources.

5.9. Civil Aviation Act (No. 13 of 2009)

Civil aviation in South Africa is governed by the *Civil Aviation Act (Act 13 of 2009)*. This Act provides for the establishment of a stand-alone authority mandated with controlling, promoting, regulating, supporting, developing, enforcing and continuously improving levels of safety and security throughout the civil aviation industry. This mandate is fulfilled by South African Civil Aviation Authority (SACAA) as an agency of the Department of Transport (DoT). SACAA achieves the objectives set out in the Act by complying with the Standards and Recommended Practices (SARPs) of the International Civil Aviation Organisation (ICAO), while considering the local context when issuing the South African Civil Aviation Regulations (SA CARs).

The DFFE Screening Tool Report identified Civil Aviation as having high sensitivity for the Project. The Project site is located approximately 3.5 km North of the Ysterplaat Aerodrome and 12 km Southwest of the Morningstar Airfield. The Cape Town International Airport is also located approximately 12 km south-east of the project site.

South African Civil Authorisation Authority (SACAA) and Air Traffic and Navigation Service (ATNS) will be included on the Project stakeholder database. They will be informed of the WML application and comment will be sought from these authorities as applicable.

5.10. City of Cape Town Integrated Development Plan

According to the *Municipal Systems Act (Act 32 of 2000)* (MSA), all municipalities have to undertake an Integrated Development Plan (IDP) process. The IDP is a legislative requirement thus it has legal status and supersedes all other plans that guide development at local government level.

The Cape Town IDP supports the city's 2027 mission to pro-actively develop and create a city environment that is resilient and sustainable and improves the quality of life, has an inclusive, job-intensive, resilient and smart economy to build an inclusive community. The city's priorities include the creation of job opportunities and sustained economic growth.

The proposed waste management activities to be undertaken by South Group, Cape Town, supports the SDF, in terms of its location and the nature and outcome of the activities.



6. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES

The below need and desirability assessment was developed according to the Integrated Environmental Management Guideline Series 9: Guideline on Need and Desirability and in terms of the EIA Regulations.

6.1. Electronic Waste

Electronic waste is one of the world's fastest-growing waste streams, including South Africa where, currently only 7-12% is recycled. Increased consumer demand, access to electrical and electronic equipment, perceived and planned equipment obsolescence have caused the waste stream to rise and resulted in a growing stock of discarded E-waste (DFFE, 2024). According to Greenscape 2022 Market Intelligence between 340 000 to 380 000 tons of e-waste are produced in South Africa per annum.

Management of E-waste presents an opportunity to recover secondary resources such as metal, plastics and glass. Recovering valuable resources yields significant employment and economic opportunities. Furthermore, the correct management of e-waste will provide new economic opportunities, provide safe working conditions and ensure the protection of the environment and the people (DFFE, 2024).

By properly recycling e-waste, valuable materials such as copper, gold, and aluminium can be recovered and reused. Moreover, e-waste recycling helps prevent hazardous substances found in electronics, like lead and mercury, from contaminating soil and water. Proper recycling methods ensure these toxins are handled safely, protecting ecosystems and public health.

It's a collective responsibility to ensure that electronic waste is disposed of properly. Companies like South Group are leading the way in this vital endeavour, offering services that not only protect the environment but also contribute to a sustainable future. Through increasing its throughput volumes of E-waste in its operations, South Group will, therefore, contribute to the above opportunities of management of this waste type and contribute to a circular economy.

Table 8: Need and Desirability Considerations

QUESTION		ANSWER
SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES		
1.	How will this development (and its separate elements/aspects) impact on the ecological integrity of the area)?	The South Group, Cape Town facility is located within an existing warehouse which forms part of an existing industrial site within an established industrial area.
1.1.	How were the following ecological integrity considerations taken into account?	The warehouse and areas surrounding the proposed site is completely developed, with no natural vegetation remaining.
1.1.1.	Threatened Ecosystems	
1.1.2.	Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure	The proposed project will also be located within the existing warehouse, therefore avoiding additional development or expansion of the existing operational footprint. Existing roads will be utilised for the transport of material, product and personnel both to and from the site. No virgin land will need to be developed, nor will any natural vegetation be removed, avoiding any ecological disturbance.
1.1.3.	Critical Biodiversity Areas (“CBAs”) and Ecological Support Areas (“ESAs”)	
1.1.4.	Conservation targets	The proposed site is zoned as Industrial, aligning with the City of Cape Town’s SDF as well as the existing and proposed land use.
1.1.5.	Ecological drivers of the ecosystem	
1.1.6.	Environmental Management Framework	City of Cape Town’s SDF is focused on ensuring sustainable economic growth whilst maintaining a liveable, safe, vibrant and productive urban environment and the accompanying infrastructure to attract and retain investment, particularly in township economic nodes. The city is committed to promoting sustainable use of land and natural resources, lower carbon emissions, climate adaptation, promoting efficient use of infrastructure, and effective public transport systems and amenities.
1.1.7.	Spatial Development Framework	
1.1.8.	Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.)	The city also prioritizes job creation and economic transformation. Identified priorities include job creation, improving service delivery, and transforming the economy to be more inclusive and sustainable. The Cape Town SDF promotes high intensity, mixed use development in well located, walkable parts of the city with good access to public transit, and lower intensity urban forms. The approval and undertaking of proposed recycling, recovery and treatment of e-waste and spent catalytic converters by South Group will support the city’s objective for economic growth by providing job opportunities, skill development and provision of raw

QUESTION	ANSWER
	<p>materials and products used by other industries to produce high demand products and materials.</p> <p>Furthermore, by optimizing their facility, South Group will assist in contributing to a circular economy and decreasing the need for ongoing mining of precious metals. Better regulation of ongoing as well as planned activities will also support local, global and international responsibilities relating to the protection of the environment.</p>
<p>1.2.</p> <p>How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity?</p> <p>What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The proposed site's location, its ecological status and the potential outcomes of the project, if approved were assessed as part of the scoping process.</p> <p>The baseline environment and aspects were assessed and researched and a summary of the site status included in the scoping report under Section 8.</p> <p>A preliminary impact assessment was undertaken and mitigation measures included under Section 10 and of this report. A full assessment in accordance with the methodology set out under section 9 of this report will be undertaken as part of the EIA phase of this application and included in the EIR and EMPr.</p>
<p>1.3.</p> <p>How will this development pollute and/or degrade the biophysical environment?</p> <p>What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>Refer to the baseline ecological information set out under Section 8 of this report and a preliminary impact assessment and mitigation measures under Section 10 of this report.</p> <p>These sections will be further expanded on in the EIA phase and included when drafting the Environmental Management Programme (EMPr).</p>

QUESTION	ANSWER
<p>1.4. What waste will be generated by this development?</p> <p>What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?</p>	<p>Due to the nature of the application and proposed project, it is anticipated that general waste, inclusive of used bulk bags, plastic, packaging waste, office paper etc will be generated during the operational phase of the project. As far as reasonably possible, relevant waste management procedures will; be implemented to limit mixing of waste and to promote recycling and or re-use where possible.</p> <p>Low risk of soil or possible water contamination was identified as part of the screening process as all operations are to be kept within the bounds of an existing warehouse, on concerted surface areas.</p> <p>Should small hydrocarbon spills or leaks occur due to the use and presence of machinery and equipment, relevant spills will be contained and cleaned up using appropriate equipment and absorbent materials. Any contaminated material generated from a spill clean-up will be considered hazardous and will be stored separately from recyclable and or re-usable waste streams.</p> <p>All waste removed from site for recycling, recovery and or disposal will be facilitated by licensed service providers, dually authorised for the designated service.</p> <p>Relevant mitigation measures will be assessed in more detail in the EIR phase and included in the EMP.</p>
<p>1.5. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage?</p> <p>What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The South Group, Cape Town operations are located within an established industrial area, within an existing warehouse. The proposed waste management activities will, if approved, also be located within the same warehouse. No development will be required which could result in possible disturbance of landscapes and impact on cultural heritage.</p> <p>Since no development is planned the potential for paleontological or archaeological impacts is avoided.</p> <p>Approval of the proposed waste management activities will allow South Group, Cape Town to continue with operation whilst providing employment opportunities to the local community whilst also supporting skills development and raw materials to local and international markets for the production of high</p>

QUESTION	ANSWER
	<p>demand products at a reasonable cost. An increased availability in precious metals recovered from e-waste will reduce the need for mined minerals which directly impacts cultural heritage in South Africa.</p>
<p>1.6.</p> <p>How will this development use and/or impact on non-renewable natural resources?</p> <p>What measures were explored to ensure responsible and equitable use of the resources?</p> <p>How have the consequences of the depletion of the non-renewable natural resources been considered?</p> <p>What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>Authorisation of proposed waste management activities will allow better management and monitoring of operations, limiting possible impacts on humans as well as the environment.</p> <p>The operations propose to modify their existing operations to optimally utilise available space for the planned waste management activities, avoiding the need for additional land development. The streamlined operation will require less energy inputs than that of a larger scale operation. The recycling, recovery and treatment activities directly supports the objectives set out by the Waste Hierarchy which reduces the need for waste disposal to land. Additionally, the sufficient and cost-effective operation can provide a sustainable supply of products and materials to local and international markets for the production of high demand products at a lower cost.</p> <p>Implementation of good practice environmental management measures and activity focused mitigation, impact on humans as well as the community can be avoided and or significantly reduced. After implementation, it is anticipated that the South Group Recycling, Cape Town operations will have a limited negative impact if managed appropriately.</p> <p>Refer to Section 10 of this report for a summary of identified impacts and proposed mitigation measures.</p>

QUESTION	ANSWER
	<p>Identified impacts and proposed mitigations will be addressed in more detail as part of the EIA phase. All outcomes will also form part of the EMP.</p>
<p>1.7.</p> <p>How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part?</p> <p>Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds?</p> <p>What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources?</p> <p>What measures were taken to ensure responsible and equitable use of the resources?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The South Group, Cape Town operations are located in an established industrial area and within an existing warehouse, equipped to house ongoing as well as planned waste management activities.</p> <p>Current operations rely mainly on manual labour which forms the basis of existing sorting and screening activities. If the proposed recycling, recovery and treatment activities are approved, will South Group will be able to install additional equipment to automate the processing operations. Once fully operational, a balance of manual and automated labour will be used for processing. In industry, many operations rely on water and high energy inputs as part of their recycling and processing needs. South Group, Cape Town will however not require water inputs for processing purposes. Additionally, the streamline design and use of state-of-the-art technology will also reduce energy</p>

QUESTION	ANSWER
<p>1.7.1. Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth, or does it reduce resource dependency (i.e., de-materialized growth)?</p> <p>(Note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life).</p>	<p>inputs and needs, reducing and minimising the use of natural resources.</p> <p>The processing of e-waste and spent catalytic converters in turn will result in the generation and supply of precious metals as well as other recyclable materials. Sustainable supply of recycled and or recovered precious metals will lead to a reduced need for mined minerals which in turn will have a positive impact on the environment.</p>
<p>1.7.2. Does the proposed use of natural resources constitute the best use thereof?</p> <p>Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e., what are the opportunity costs of using these resources this the proposed development alternative?)</p>	<p>Recycling of e-waste and spent catalytic converters also avoids the need for disposal. By avoiding the disposal, the possibility of heavy metals like lead and mercury which are present in many electronic devices, PC boards, appliances etc from contaminating soil and water resources. Proper recycling methods ensure these toxins are handled safely, protecting ecosystems and public health.</p>
<p>1.7.3. Do the proposed location, type and scale of development promote a reduced dependency on resources?</p>	
<p>1.8. How was a risk-averse and cautious approach be applied in terms of ecological impacts?</p>	<p>By undertaking the scoping process, a preliminary assessment was undertaken with the aim of identifying potential impacts associated with the proposed scope of the project.</p>
<p>1.8.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p>	<p>The assessment was grounded on information provided by the applicant and information available to the EAP by means of research, industry standards and experience.</p>
<p>1.8.2. What is the level of risk associated with the limits of current knowledge?</p>	
<p>1.8.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p>	<p>A full assessment will be undertaken during the EIA phase which will include a full risk assessment. Based on the outcomes, appropriate mitigation will be assigned to each aspect in order to limit negative impact from the proposed project.</p> <p>Based on the preliminary assessment undertaken as part of the scoping phase, overall risk of impact is anticipated to be low.</p>

QUESTION	ANSWER
<p>1.9. How will the ecological impacts result from this development impact on people's environmental right in terms following.</p>	<p>South Group, Cape Town operates an existing waste storage and transfer facility which now propose to include the recycling, recovery and treatment of waste into their approved scope of work. Current operations are located within an established industrial area within an existing warehouse which is equipped to house existing as well as planned waste management operations, limiting the need for development. By using available industrial space no virgin land will need to be developed, which in turn limits habitat disturbance and or destruction.</p> <p>By installing the new equipment, the existing facility will be able to sufficiently process approved waste streams, providing higher quality products. The proposed recycling, recovery and treatment activities support the objectives of the National Waste Hierarchy by avoiding the need for waste disposal. E-waste is known to contain heavy metals which pose a risk to the natural environment when not managed appropriately. When disposed to land, the waste could leach out traces of heavy metals which in turn pollute soil as well as water resources, posing risk to human and animal health.</p>
<p>1.9.1. Negative impacts: e.g., access to resources, opportunity costs, loss of amenity (e.g., open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc.</p> <p>What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimize, manage and remedy negative impacts?</p>	<p>On a social and economic level, already employed personnel will be provided with employment security, new employment opportunities may be generated, skills development will be supported.</p> <p>The proposed recycling, recovery and treatment operations will also allow South Gorup, Cape Town to produce higher quality products which in turn support alternative industries which rely on the materials for their operation and the production of alternative products and materials, thus wholistically supporting economic growth.</p>
<p>1.9.2. Positive impacts: e.g., improved access to resources, improved amenity, improved air, or water quality, etc.</p> <p>What measures were taken to enhance positive impacts?</p>	<p>On a social and economic level, already employed personnel will be provided with employment security, new employment opportunities may be generated, skills development will be supported.</p> <p>The proposed recycling, recovery and treatment operations will also allow South Gorup, Cape Town to produce higher quality products which in turn support alternative industries which rely on the materials for their operation and the production of alternative products and materials, thus wholistically supporting economic growth.</p>

QUESTION	ANSWER
1.10. Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socioeconomic impacts (e.g., on livelihoods, loss of heritage site, opportunity costs, etc.)?	<p>Limited direct ecological impacts associated with the proposed project are anticipated as the proposed project will be located and limited to an existing warehouse, located in an established industrial area.</p> <p>No new development will be required, avoiding possible impacts on social and or heritage aspects.</p> <p>Approval of the proposed project will allow the Applicant to continue with operation at a more competitive level, providing employment security to already employed personnel. New employment opportunities may also be generated which positively impacts the surrounding community.</p> <p>The proposed recycling, recovery and treatment operations will also allow South Gorup, Cape Town to produce higher quality products which in turn support alternative industries which rely on the materials for their operation and the production of alternative products and materials, thus wholistically supporting the economy.</p>
1.11. Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?	<p>A very low ecological impact is anticipated as the proposed project will be located within an established industrial area and housed in an existing warehouse, already utilised by South Group, Cape Town for existing waste storage and transfer activities.</p> <p>A complete assessment of impacts associated with the proposed project will be undertaken in the EIA phase and mitigation set out in the EMP.</p>
1.12. Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?	<p>Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report.</p> <p>Based on the outcomes of the assessments and discussions the best suited option with the lowest impact was chosen for the application.</p>
1.13. Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the Project in relation to its location and existing and other planned developments in the area?	<p>Section 10 of this report sets out a summary of potential impacts identified as part of the scoping process which includes considerations of the nature of the project, its size and scale, location. Outcomes of the assessment will be assessed in more detail in the EIA phase and will be addressed in the EMP.</p>

PROMOTING JUSTIFIABLE ECONOMIC AND SOCIAL DEVELOPMENT

QUESTION		ANSWER
2.1.	What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?	The South Group E-waste Operation is aligned with the objectives of the IDP as the Project is located in an established industrial area, characterised by warehousing, large format stores and distribution centres.
2.1.1.	The IDP (and its sector plans' vision, objectives, strategies, indicators, and targets) and any other strategic plans, frameworks of policies applicable to the area,	The Cape Town IDP supports the city's 2027 mission to pro-actively develop and create a city environment that is resilient and sustainable and improves the quality of life, has an inclusive, job-intensive, resilient and smart economy to build an inclusive community. The city's priorities include the creation of job opportunities and sustained economic growth.
2.1.2.	Spatial priorities and desired spatial patterns (e.g., need for integrated or segregated communities, need to upgrade informal settlements, need for densification, etc.),	The proposed waste management activities to be undertaken by South Group, Cape Town, supports the SDF, in terms of its location and the nature and outcome of the activities.
2.1.3.	Spatial characteristics (e.g., existing land uses, planned land uses, cultural landscapes, etc.), and	The city's priorities also include the creation of job opportunities and sustained economic growth. The South Group, Cape Town operations, therefore, supports these priorities.
2.1.4.	Municipal Economic Development Strategy ("LED Strategy").	The City of Cape Town is committed to reducing spatial inequality, promoting economic growth and development through the establishment of a conducive environment for business investment. The South Group, Cape Town operations, therefore, supports the IDP, in terms of its location and the activity occurring on site.
2.2.	Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?	The WML application by South Group will benefit society and the surrounding communities both directly and indirectly by providing employment opportunities during the operational phase. Direct economic benefits will be derived from wages, taxes and profits. Furthermore, the Project will contribute to the circular economy by sustainably supplying high quality product and materials used by alternative industries for the production of high demand products and services.
2.2.1.	Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	
2.3.	How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?	The local community will benefit directly from the proposed project on a social and economic scale through employment opportunities and skill development. Limited cultural or heritage impacts are anticipated as the project is proposed to be located within an existing warehouse in an industrially zoned

QUESTION		ANSWER
		<p>area. Operations will therefore not encroach into local communities or impact the visual aesthetic of the surrounding areas.</p> <p>A formal public participation process will also be undertaken as part of the scoping phase of this application as well as during the EIA phase. Relevant information will be provided to identified IAPs with regards to the proposed project and the application. Comments will be encouraged and all responses recorded and included for consideration in both phases of the application.</p> <p>Refer to Section 13 of this report for the public participation process and Section 3 and Section 4 for a description on the location and proposed scope of the project.</p>
2.4.	<p>Will the development result in equitable (intra- and inter-generational) impact distribution, in the short and long-term?</p> <p>Will the impact be socially and economically sustainable in the short- and long-term?</p>	<p>Refer to the preliminary impact assessment under Section 10 of this report as well as the plan of study for the EIA set out under Section of this report. Based on the outcomes of the scoping phase, relevant mitigation measures were assigned to identified impacts which will be included in the full assessment to be undertaken as part of the EIA phase of this application.</p>
2.5.	In terms of location, describe how the placement of the proposed development will -	<p>Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report.</p> <p>A preliminary screening assessment was also undertaken and potential impacts, inclusive of social, economic, heritage, cultural and environmental aspects identified. A full assessment of the impacts will be undertaken and included in the EIA phase.</p> <p>A comprehensive public participation process will also be undertaken during which identified IAP's will be informed of the application and planned project. Participation and comments will be encouraged and all responses recorded and included in each phase of the application process which will finally be submitted to the competent authority for consideration.</p>
2.5.1.	result in the creation of residential and employment opportunities in close proximity to or integrated with each other,	
2.5.2.	reduce the need for transport of people and goods,	
2.5.3.	result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	
2.5.4.	compliment other uses in the area,	
2.5.5.	be in line with the planning for the area,	
2.5.6.	for urban related development, make use of underutilised land available with the urban edge,	

QUESTION		ANSWER
2.5.7.	optimise the use of existing resources and infrastructure,	
2.5.8.	opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),	
2.5.9.	discourage "urban sprawl" and contribute to compaction/densification	
2.5.10.	contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,	
2.5.11.	encourage environmentally sustainable land development practices and processes,	
2.5.12.	take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),	
2.5.13.	the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),	
2.5.14.	impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and	
2.5.15.	in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?	
2.6.	How were a risk-averse and cautious approach applied in terms of socio-economic impacts?	
2.6.1.	What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	
2.6.2.	What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?	
2.6.3.	Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	

QUESTION		ANSWER
2.7.	How will the socio-economic impacts result from this development and impact on people's environmental right in terms following:	<p>A preliminary screening assessment was also undertaken and potential impacts, inclusive of social, economic, heritage, cultural and environmental aspects identified. A full assessment of the impacts will be undertaken and included in the EIA phase. Based on the outcomes, a EMP will be developed, setting out appropriate mitigation of impacts.</p>
2.7.1.	Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?	
2.7.2.	Positive impacts. What measures were taken to enhance positive impacts?	
2.8.	<p>Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</p>	<p>Authorisation of the proposed waste management activities will allow better management and monitoring of operations, limiting possible impacts on humans as well as the environment.</p> <p>The operations propose to modify their existing operations to optimally utilise available space for the planned waste management activities, avoiding the need for additional land development. The streamlined operation will require less energy inputs than that of a larger scale operation. The recycling, recovery and treatment activities directly supports the objectives set out by the Waste Hierarchy which reduces the need for waste disposal to land. Additionally, the sufficient and cost-effective operation can provide a sustainable supply of products and materials to local and international markets for the production of high demand products.</p> <p>Implementation of good practice environmental management measures and activity focused mitigation impacts on humans as well as the community can be avoided and or significantly reduced. After implementation, it is anticipated that the South Group Recycling, Cape Town operations will have a limited negative impact if managed appropriately.</p> <p>Refer to Section 10 of this report for a summary of identified impacts and proposed mitigation measures.</p> <p>Identified impacts and proposed mitigations will be addressed in more detail as part of the EIA phase. All outcomes will also form part of the EMPr.</p>

QUESTION	ANSWER
<p>2.9. What measures were taken to pursue the selection of the “best practicable environmental option” in terms of socio-economic considerations?</p>	<p>Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report.</p> <p>A preliminary screening assessment was also undertaken and potential impacts, inclusive of social, economic, heritage, cultural and environmental aspects identified.</p> <p>Based on the outcomes of the screening assessment and possible impacts identified, the best suited approach was recommended based on the level of impact and both before and after mitigation.</p> <p>A full assessment of the impacts will be undertaken and included in the EIA phase.</p>
<p>2.10. What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?</p> <p>Considering the need for social equity and justice, do the alternatives identified, allow the “best practicable environmental option” to be selected, or is there a need for other alternatives to be considered?</p>	<p>As part of the screening process, several aspects were assessed in association with different alternatives which included technology, location, layout and design.</p> <p>Based on the outcome it was determined that the existing facility, already operated by South Group, Cape Town was the best suited option. By focusing the proposed project in the existing operations footprint, the need for land development or relocation is avoided. The existing facility is also located within an established industrial area, surrounded by warehousing and distribution centres, thus blending into the aesthetic of the area.</p> <p>The approval of the proposed project will not result in any injustice or discrimination towards any person. In contrast, the approval of the proposed project will result in long term benefit due to job creation, employment security and skills development.</p> <p>Refer to the impact assessment and mitigation measures in Section 10. These aspects will be further explored in the EIA and EMPr.</p>
<p>2.11. What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</p>	<p>By conducting a Scoping and EIA process, the Applicant ensures that equitable access to environmental resources was considered.</p> <p>Refer to Section 10 of this report for a summary on identified impacts and prescribed mitigation measures. A full assessment will be included in the EIA phase and outcomes addressed in the EMPr.</p>

QUESTION		ANSWER
2.12.	What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?	By conducting a Scoping and EIA process, the Applicant ensures that equitable access has been considered. Refer to Section 10 of this report for a summary on identified impacts and prescribed mitigation measures. A full assessment will be included in the EIA phase and outcomes addressed in the EMP.
2.13.	What measures were taken to:	<p>During the scoping process a comprehensive public participation process will be undertaken which is aimed at informing identified IAPs of the proposed project and this application. Participation and comments will be encouraged and all responses recorded and included in the Final Scoping Report which will be submitted to the competent authority for consideration.</p> <p>Refer to Section 13 of this report for a summary of the proposed public participation process to be undertaken</p>
2.13.1.	ensure the participation of all interested and affected parties,	
2.13.2.	provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation,	
2.13.3.	ensure participation by vulnerable and disadvantaged persons,	
2.13.4.	promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,	
2.13.5.	ensure openness and transparency, and access to information in terms of the process,	
2.13.6.	ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition was given to all forms of knowledge, including traditional and ordinary knowledge, and	
2.13.7.	ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted?	
2.14.	Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?	Refer to Section 13 of this report, describing the public participation process to be implemented for the proposed project. This aspect will be further explored in the EIA and EMP.

QUESTION		ANSWER
2.15.	What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?	<p>South Group will implement a Safety, Health, Environmental and Quality Policy on site which will regulate all activities on site.</p> <p>All workers and contractors will need to abide to the policies and framework as specified.</p> <p>A training and awareness programme must also be developed and implemented to ensure ongoing training and awareness of employees.</p>
2.16.	Describe how the development will impact on job creation in terms of, amongst other aspects:	<p>South Group, Cape Town operates an existing waste storage and transfer facility which is equipped with existing access routes and supporting transport infrastructure used by employees for their daily commutes.</p> <p>If this application is approved, South Group, Cape Town will be able to continue operations on a more sustainable level which in turn provide more job security to already employed persons. New employment opportunities may also be created during the operational phase and skills development supported.</p> <p>The proposed recycling, recovery and treatment operations will also allow South Gorup, Cape Town to produce higher quality products which in turn support alternative industries which rely on the materials for their operation and the production of alternative products and materials, thus wholistically supporting economic growth.</p>
2.16.1.	the number of temporaries versus permanent jobs that will be created,	
2.16.2.	whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area),	
2.16.3.	the distance from where labourers will have to travel,	
2.16.4.	the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and	
2.16.5.	the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).	
2.17.	What measures were taken to ensure:	<p>South Group, Cape Town is in the process of applying for a Waste Management License (WML) in terms of the National Environmental Management: Waste Act, 59 of 2008 (NEMWA), read together with the Environmental Impact Assessment Regulations, 2014.</p> <p>As part of the scoping process alternative legislations and regulations were also considered and are included in a summarised discussion under Section 5 of this report.</p> <p>As part of this application, a copy of the Draft Scoping Report will be subject to a comprehensive public</p>
2.17.1.	that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and	

QUESTION	ANSWER
<p>2.17.2. that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?</p>	<p>participation process, aligned with the requirements set out in terms of the EIA Regulations. As part of the public participation process all relevant authorities, inclusive of national, provincial and local authorities will be informed of the application and a copy of the draft report provided for review and comment.</p> <p>Refer to Section 13 of this report for a summary of the public participation process.</p>
<p>2.18. What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?</p>	<p>During the scoping process a comprehensive public participation process will be undertaken which is aimed at informing identified IAPs of the proposed project and this application. Participation and comments will be encouraged and all responses recorded and included in the Final Scoping Report which will be submitted to the competent authority for consideration.</p> <p>Refer to Section 13 of this report for a summary of the proposed public participation process to be undertaken</p>
<p>2.19. Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?</p>	<p>Mitigation measures prescribed were based on the outcome of impacts identified and are realistic and easily implementable.</p> <p>Refer to the impact assessment and mitigation measures in Section 10 of this report. This aspect will be further explored in the EIA and EMPr.</p>
<p>2.20. What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?</p>	<p>South Group, Cape Town is in the business of waste minimization which supports the objectives of the National Waste Hierarchy by preventing unnecessary disposal of high-risk waste (such as e-waste) to land. By recovering, recycling and treating the waste, the potential contamination of natural resources, leading to human and animal health impacts is avoided. In addition, the recycling, recovery and treatment activities will generate high quality materials which can sustainably be provided to alternative industries for the production high value products and materials.</p> <p>Indirectly the operation will reduce the need for raw material inputs which in general are supplied by mining operations which as a whole have a large-scale impact on the environment.</p>

QUESTION		ANSWER
2.21.	Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?	Refer to Section 7 (description of the process followed to reach the proposed preferred site), of this report. This aspect will be further explored in the EIA and EMPr.
2.22.	Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?	Refer to Section 12 of this report. This aspect will be further explored in the EIA and EMPr.



7. REASONABLE AND FEASIBLE ALTERNATIVES CONSIDERED

According to the EIA Regulations, all reasonable and feasible alternatives must be identified through an impact and risk ranking process. Each alternative must be assessed and the outcomes discussed, focusing on the advantages and disadvantages of the associated alternative and activities will have on the environment and socio-economy.

This section evaluates the identified alternatives with respect to the operations of South Group, Cape Town.

7.1. No-Go Alternative

The first alternative considered was the no-go option. The no-go alternative is considered the least favourable option in terms of waste management which would lead to the most severe environmental impacts as well as impacts on the surrounding area and community's socio-economic status and wellbeing.

The no-go alternative would entail the rejection of this application and continued operation of the existing storage and transfer operations without modification. No recycling, recovery or treatment activities will therefore be authorised and will not be undertaken which in turn will result in more material being diverted to landfill for disposal. The benefits associated with the proposed recycling, recovery and treatment of approved waste streams will be lost. Precious metals as well as re-usable materials will not be recovered.

South Africa faces a significant e-waste problem. According to statistics, approximately 360,000 tons of e-waste is generated annually, with a formal recycling rate of only 7% to 12%. The country has banned e-waste from landfills as of August 2021, but challenges remain due to the rapid growth of e-waste and the low level of formal recycling. This has led to harmful leaching of toxic substances into the environment and lost valuable materials. Although e-waste is not permitted for landfill disposal the regulation of the ban is lacking. In addition, illegal dumping rates have increased, posing even higher risk of toxins leaching into the natural environment. Illegal dumping leads to unregulated scrapping and processing of materials with the aim of reclaiming any fraction of precious metals or materials of value. Informal processing methods include the burning of waste materials which in turn releases unfiltered fumes and emissions to atmosphere. Should the application for recycling, recovery and treatment be rejected, the no-go alternative will need to be enforced. In the long term this may place the company under pressure as the existing operations will not be able to keep up with market demands and the growing economy, resulting in possible financial strain. Competing operations will soon out compete South Group, possibly leading to the final closure of the operation.

Overall, the no-go alternative is not considered feasible and is therefore not recommended.

7.2. Alternative Locations

Considering the options available to South Group, the only alternative to the option of location would be to pursue the purchase or leasing of a new property. This alternative is however not considered practically feasible as the sourcing of a new property would require substantial financial contribution, not only to obtain the property but also for the preparation of the property to facilitate the proposed activities. A new application for the authorisation of the proposed waste management activities would also need to be undertaken, extending the possible commencement date for operation. The planned use of the current facility leased by South Group is therefore in comparison much better suited.

The existing operations are housed in an existing warehouse which is already zoned for industrial use. No new roads or access routes will need to be constructed as access to the existing facility can be gained via established roads. Should an alternative facility be sourced, the location may be more rural which in turn will require the establishment of access routes. Relocating the operations may negatively impact a large portion of employees and personnel who rely on public transport for their daily commute. These employees and personnel also live in settlements or residential areas within close proximity to the existing facility. Relocation of operations will result in higher cost to the employees to get to and from work on a daily basis, which may lead to employees resigning or possible job losses.

The existing site and location proposed considered to be completely transformed due to existing and ongoing industrial activities. By utilising an existing site and associated infrastructure, no virgin land will need to be transformed to accommodate the proposed operations. The site is not situated near any sensitive environmental features that can be impacted by the proposed activities.

The Table below contains an evaluation of the existing site, which is to also include the proposed waste management activities if approved.

Table 9: Site Selection Matrix

Environmental Consideration	Site Evaluation	
Within a 3 000m radius of the end of an airport landing strip.		x
Within an unstable area (fault zone, seismic zone, dolomite, sinkholes).		x
Within 500m of water resource.		x
Nodality with respect to raw materials.		x
Availability of land for expansion of production volumes.	✓	
Accessibility in terms of road networks.	✓	
Zoned as Industrial.	✓	
Distance to the boundary of the nearest residential area.	± 0.5 km	



The site location alternatives will not further be addressed in this study as the existing site and operational location is preferred from a logistical, financial and strategic perspective.

7.3. Alternative Technologies

South Group, Cape Town accepts all ranges of e-waste as well as spent catalytic convertors which are subject to manual sorting as well as crushing and screening before being packaged and sold to relevant clients for additional processing. South Group proposes to start treating E-waste by separating the plastics and other waste materials from the electronic material, to increase its export volumes.

In order to facilitate the proposed treatment and processing activities, different technologies were considered. As part of the process, the available space, safety requirements as well as energy inputs and process flow had to be addressed. Due to limited space availability, the need for a compact and efficient option was prioritised. From experience, South Group have favoured the use of Horizontal Crushers, Hammer Mills and Vacuum filters as the best suited technologies for their undertaking. Alternative technologies considered, included Shredders and Granulators but were excluded due to practical reasons. Both technology types require high energy inputs which in turn raise production costs. Wet shredders also require consistent water intake which will have to be supplied by existing municipal supplies. Effluent generated from the wet shredder would also need to be managed, which in turn will require structural modifications to accommodate the installation and use thereof. Space restrictions in addition to the fact that the facility is leased and not owned poses difficulties, limiting the potential for the use of the considered technology type.

In conclusion, the use of shredders and or granulators was deemed impractical and therefore not considered any further.

7.4. Alternatives in terms of Scheduling and Timing

Scheduling and timing alternatives were not assessed as the existing operations will continue.

7.5. Alternatives in terms of Scale and Magnitude

No scale alternatives were assessed. The proposed site currently utilised by South Group Cape Town is considered to be ideal for the current as well as proposed operations. Chosen technology types were selected based on several aspects, including space needs and functionality. Designs and layouts for the operation are therefore considered to be optimal, avoiding the need for structural modifications or extensions to the existing warehouse and infrastructure. No additional development will be required.



7.6. Conclusion to the Alternatives Considered

South Group propose install new equipment at their existing facility in order to accommodate the proposed recycling, recovery and treatment of e-waste and spent catalytic convertors. The existing facility consists of an existing warehouse, located in an established industrial area. The proposed site and surroundings have completely been transformed due to ongoing industrial activities. The proposed site is also not located near any sensitive environmental features that would be impacted by the planned waste management activities. By using an existing facility, instead of relocating to an alternative location the need for land development is avoided. Employed personnel will be able to continue with work without disruption, also limiting possible resignations and job losses.

Technology selected for the proposed waste management activities is considered to be the best suited for the undertaking. New technology brought in will link up with the existing infrastructure to improve operations. Space restrictions also require optimal layout planning which will ensure effective and efficient operations to continue. Alternative technology types which were considered were excluded due to input costs, space restrictions, energy inputs and the need for additional development which would be required in order for the technology type to be installed and used.

Should the application for the waste treatment and processing activities be rejected then South Group, Cape Town will be forced to continue with operations in its current state. Although no short-term impacts are considered severe long-term impacts following the decision may lead to economic pressures as the company would not be able to evolve in line with competitors in the market. This could in turn lead to financial pressure which could lead to potential retrenchments of staff members and final closure of operations.

8. DESCRIPTION OF THE BASELINE ENVIRONMENT

8.1. Climate

Cape Town is characterised as having a "*Mediterranean*" climate, with warm, dry summers and mild, wet winters. Summer months range between December to February and are dominated by sunny and dry weather conditions. Temperatures tend to range between 25°C to 35°C on average. Cape Town falls within a winter rainfall region, associated with wet, windy and moderately low temperatures (13°C to 19°C on average). Months spanning between June to September are associated with significant precipitation and strong north-westerly winds.

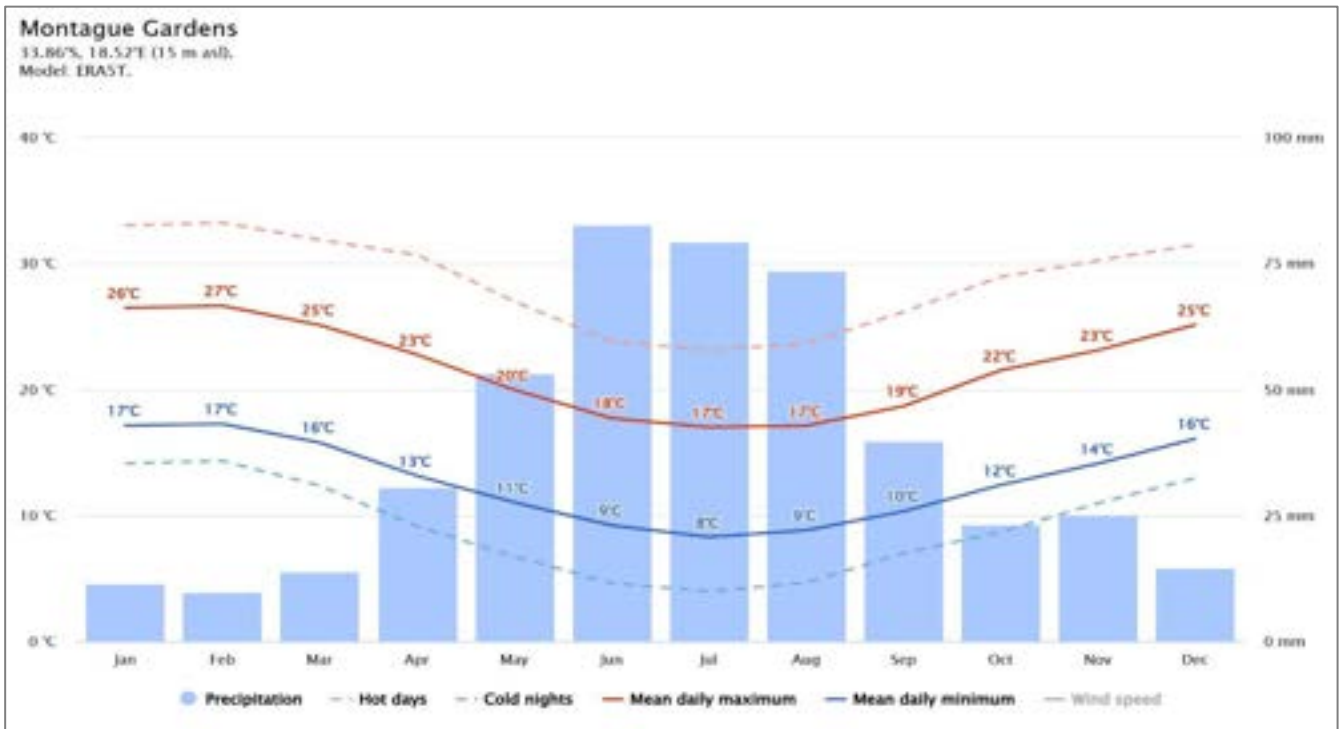


Figure 4: Mean temperatures and precipitation (Meteoblue, 2024)

8.1.1. Mean Monthly Wind Direction and Speed

Cape Town is considered a “windy city” with windier conditions associated most with late spring and summer. During this time the dominant wind direction tends to be south easterly in direction. In the winter months, the wind direction shifts to a North-westerly direction whilst wind speeds tend to pick up. The shift supports the onset of cold fronts and brings in moisture from the Atlantic Ocean, supporting the regions winter rainfall climate.

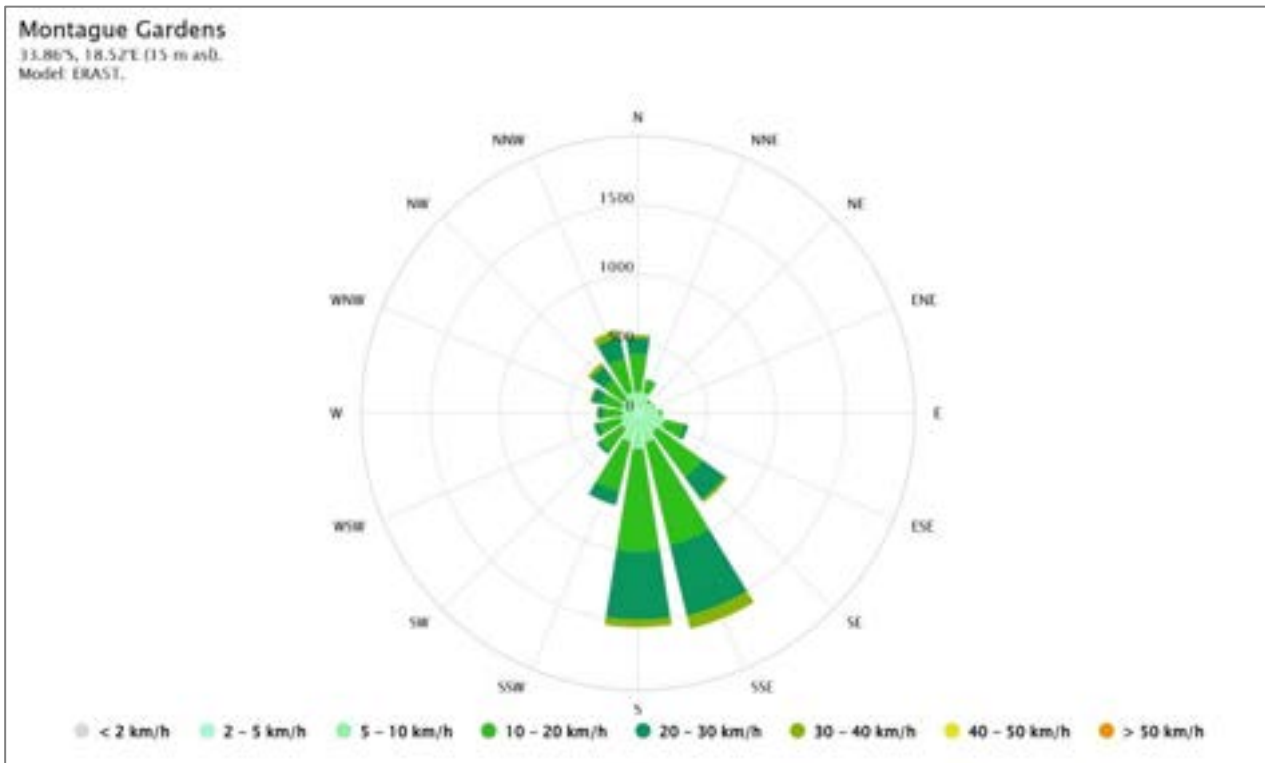


Figure 5: Montague Gardens, Cape Town Annual Wind Rose

8.2. Hydrology

The hydrology of the Montague Gardens area in Cape Town is defined by its low-lying position on the Cape Flats, which results in a high-water table and surface drainage via canals into the nearby Diep River.

The site is located within the existing industrial area of Montague Gardens which forms part of the Diep River Catchment area and the quaternary catchment G21F. Operations are housed within a warehouse on concreted surfaces, limiting potential contact with storm water and runoff. The site itself is considered to be flat with drainage leading to existing stormwater infrastructure.

8.3. Topography

Montague Gardens in Cape Town has a largely flat topography, with an estimated average elevation of only 15 meters above sea level. As a well-planned industrial area, its flat terrain is ideal for large-scale warehousing, manufacturing, and distribution activities that characterize the suburb.

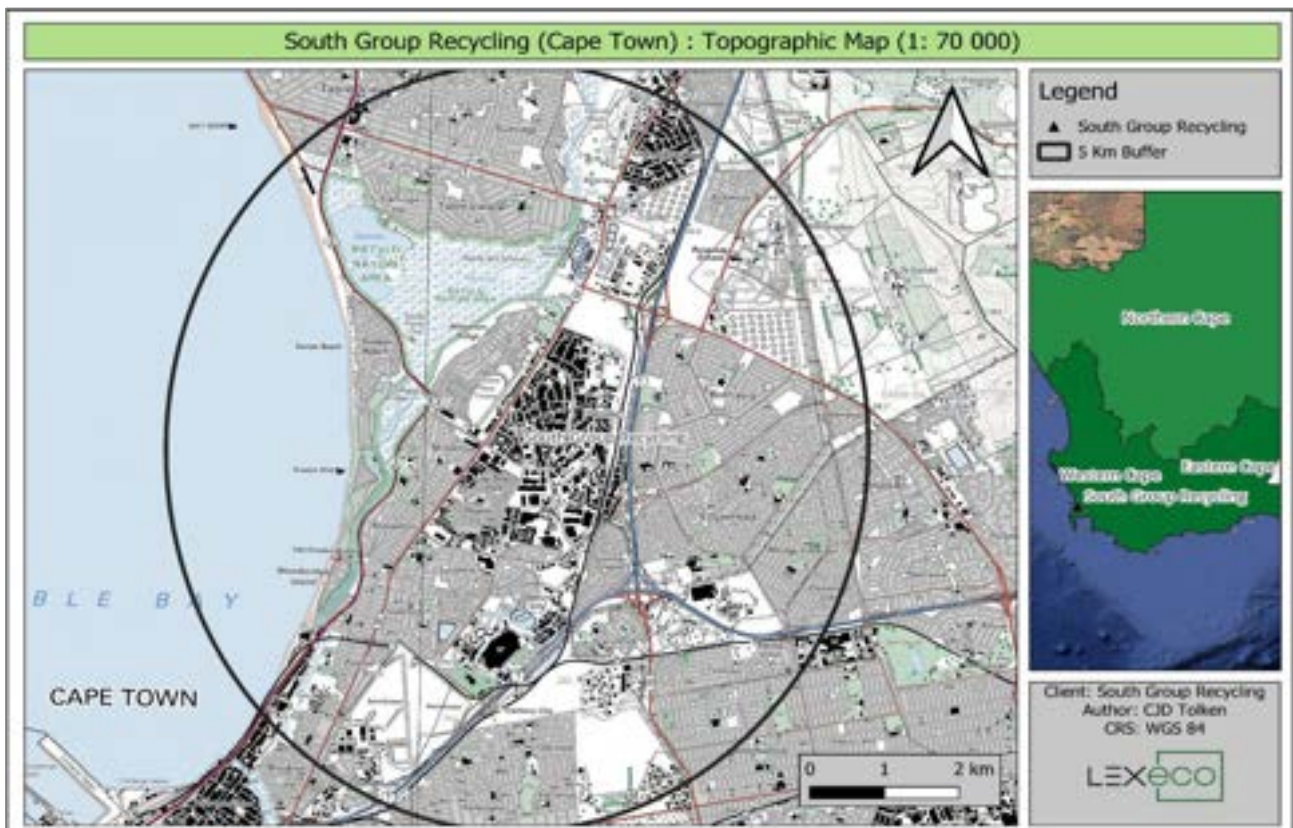


Figure 6: South Group Recycling, Cape Town Topographic Map

8.4. Geology and Soils

The site and surrounding area's geology is primarily characterized by alluvium and aeolian deposits on the surface, with the bedrock being Cape Granite and underlying formations of the Table Mountain Group (TMG). The surface soils are a mix of recent alluvial deposits and wind-blown sand from the nearby Tygerberg and a relatively flat coastal plain. The area's geological history involves ancient sedimentation and intrusion, which created a layered landscape.



Figure 7: Area Geology and Soil Composition

8.5. Vegetation

Montague Gardens is located within the fynbos biome which, before significant urban development was dominated by the unique Cape Flats Sand Fynbos characterised by dense shrubland on sandy plains. The Cape Flats Sand Fynbos is characterised by a species-rich, dense shrubland dominated by proteas and restios, with seasonal wetlands and emergent shrubs, growing in deep, acidic sands.

Due to extensive development, the natural biome has been largely replaced by industrial and commercial properties. The original flora and fauna survive only in small, conserved patches and reserves across the broader Cape Flats region, such as the Cape Flats Nature Reserve.

The South Group, Cape Town operations are located within an established warehouse which forms part of an already developed and established industrial area with no natural vegetation present.



Figure 8: Area Vegetation

8.6. Socio-Economic

The site is situated in the jurisdiction of the Cape Town District which covers approximately 2 441 km². According to the 2022 census, the City of Cape Town Municipality is home to approximately 4 772 846 people, with an average household size of 3.3. In terms of gender, Cape Town is considered balanced, as the reported proportion of males is between 48% and 49%, while the proportion of females is between 51% and 52%. On average approximately 36.5% of the population has a grade 12 or higher qualification whilst approximately 2% of the population has no schooling. The average reported income for a median household in Cape Town was reported to be R 14 100.00 per month.

Montague Gardens in Cape Town is considered to be a significant economic hub, known industrial and commercial activity, with a focus on logistics, warehousing, manufacturing, and retail distribution. The area is well planned and ideally located close to the Cape Town harbour and airport which support import and export of materials, products and services.

Demographic Information for City of Cape Town

Cape Town	2022 Census
Population	4 772 846
Households	1 452 845
Average Household Size	3.30
Age of the Cape Town Population	
0-14	22.4%
15-34	35.0%
35-59	32.4%
60+	10.2%
Sex	
Male	48.3%
Female	51.7%
Dwelling Type	
Formal	87.5%
Informal	11.7%
Education	
No Schooling	1.9%
Completed Primary	3.1%
Grade 12	36.5%
Higher Education	20.0%
Household Profile	
Number of Households	1 452 845
Average Household Size	3.3
Household Services	
Flushing Toilet	93.4%
Chemical toilet	1.5%
Pit or Bucket toilet	4.0%
Other	0.2%
Energy for Cooking	
Electricity	64.2%
Gas or Paraffin	35.3%
Wood or Coal	0.1%
Energy for Lighting	
Electricity	96.7%
Gas or Paraffin	1.6%
Candles	1.3%
Solar	0.3%

8.7. Site Verifications

In accordance with the Screening Tool report the following sensitivities were identified:

- Agriculture Theme – **Medium Sensitivity**
- Animal Species Theme – **Medium Sensitivity**
- Aquatic Biodiversity Theme – **Low Sensitivity**
- Archaeological and Cultural Heritage Theme – **Low Sensitivity**
- Civil Aviation Theme – **High Sensitivity**
- Defence Theme – **Very High Sensitivity**
- Paleontological Theme – **Low Sensitivity**
- Plant Species Theme – **Low Sensitivity**
- Terrestrial Biodiversity Theme – **Very High Sensitivity**

As there will be no land clearance or expansion of the existing physical footprint of the site, the site sensitivities are considered to be low to very low. As the facility in which South Group is already operational is existing. In addition, the warehouse is located in a built-up industrial area, where no vegetation remains. It is the opinion of the EAP that no specialist studies are required to support this waste licence application process since the area is already disturbed by the existing infrastructure and does not have any remaining natural vegetation, water and heritage resources.

No specialist studies will be undertaken for the proposed WML application. Below sections include the findings made as part of the site verification undertaken in support of the EAPs opinion not to undertake any specialist assessments.

8.7.1. Agriculture and Land Use

The proposed site is located within an already developed industrial area, namely Montague Gardens in Cape Town. The site and surrounding properties are all zoned industrial and dually utilised for industrial purposes. Large format warehouses and distribution centres dominate the surrounding landscape, limiting the possibility for agricultural development and or land use.

The “Low” sensitivity rating assigned by the National Screening Tool is considered accurate. Based on the findings of the site verification, no additional assessment will be undertaken or included in the Impact Assessment phase of this application.



Figure 9: Aerial View of South Group Cape Town

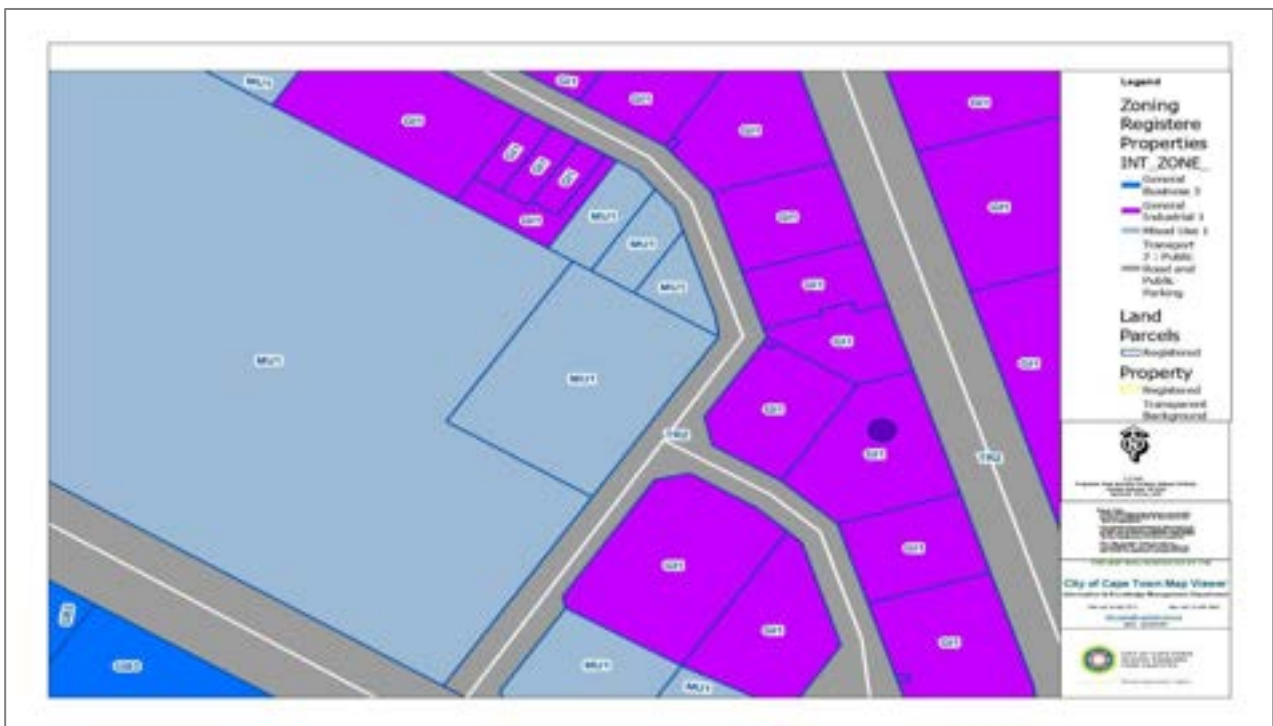


Figure 10: Property Zoning according to the COCT SDF



Figure 11: Montague Gardens and Surrounds Land Use Map



Photo 1: External view of Unit 2 in the Marconi Estate, leased by SGR



Photo 2: Product packaging and storage



Photo 3: General view of warehouse and operational areas



Photo 4: General view of warehouse and operational areas

8.7.2. Terrestrial Biodiversity

The terrestrial biodiversity in Montague Gardens, Cape Town, is heavily degraded due to extensive historical development, infrastructure, and alien vegetation. The area was originally Swartland Granite Renosterveld, but human activity has left very little indigenous vegetation. Loss of habitat has led to the migration of indigenous fauna to outlying areas and or protected areas within or surrounding the greater Cape Town region. Conservation of protected areas is considered a crucial step in protecting what is left of the natural



biomes and ecosystems. Limiting land development and encroachment of alien invasive species have become a key focus in the conservation efforts implemented by the City of Cape Town.

By approving this application, South Group will be able to continue with existing operations as well as include additional waste management activities to their approved scope. The facility currently leased by South Group is considered ideal as the property and surrounds have already been disturbed. The established industrial area supports the current as well as planned operations, limiting the need for additional development which would include clearance of vegetation and or land disturbance. Continued operation within the already leased warehouse will therefore avoid any impacts on the terrestrial biodiversity of the area.

8.7.3. Surface Water and Wetlands

No water resources or wetlands are located within close proximity to the proposed project area. The closest water resource is the Diepriver which flows along the R27, approximately 1.5km west of the site.

All waste management activities are to be housed within an existing warehouse. No storm water or rain will come into contact with the approved waste streams as all materials and processing activities will be under roof. The site is also equipped with existing drainage infrastructure, which diverts clean runoff away from the warehouse, avoiding area flooding.

Proposed waste management activities will also not require any water intake, limiting the generation of effluent. Water use will only be for domestic purposes which will rely on existing municipal supply and infrastructure.



Figure 12: Area Hydrology, South Group, Cape Town

8.7.4. Palaeontology, Archaeology and Cultural Heritage

The site is located within the already developed industrial area. No additional development which would require clearance of vegetation or site disturbance will be required or be undertaken. It is therefore not expected that any cultural, heritage or palaeontological resources will be impacted.

8.7.5. Civil Aviation and Defence

The high rating assigned by the National Screening tool has been contributed to the fact that the proposed site is located approximately 3.5 km away from the Ysterplaat aerodrome, 11km south-west of the Morningstar Airfield and 12km north-west of the Cape Town International Airport.

The proposed waste recycling, recovery and treatment of waste by South Group will be housed within an existing warehouse which forms part of an already developed and existing industrial area. The proposed project will not encroach into any airspace and will pose no risk to ongoing aeronautical operations. Additionally, proposed operations will not have any impact on the operations of the national defence force.

As a precaution, relevant contacts from the Civil Aviation Association, Cape Town as well as the National defence Force will be included in the list of identified Interested and Affected parties and will be informed as part of the public participation process.

8.7.6. Noise

Noise in the Project area is currently mostly generated by vehicle traffic and other surrounding industries. Possible noise generation may occur from vehicles delivering waste that will be recycled at the site. Since this Project will not include construction activities outside of the existing building, noise impacts are not anticipated to be significant.

8.7.7. Traffic

The South Group E-waste operations is already in an operational phase and located within an urban area. Possible impacts on traffic may occur due to transportation of waste materials that will be recycled at the site, however, these are not anticipated to be of high significance as a low frequency of loads entering and leaving the site is anticipated.

8.7.8. Air Quality

In Cape Town, air quality is a significant concern marked by seasonal changes which lead to a characteristic “brown haze” caused by high particulate matter levels. The city's air quality is challenged by a combination of atmospheric, industrial, and socio-economic factors, despite legislative measures to manage pollution.

Between the months of May to August, air quality tends to decrease due to low-level temperature inversions, where a warm air layer traps cooler, “polluted” air near the surface, preventing it from dispersing. This phenomenon is worsened by the city's topography, which limits ventilation. Emissions such as Particulate Matter (PM) is generate daily by both the natural environment and human activity. Industrial operations, incomplete combustion and burning of fossil fuels as well as agricultural activity all contribute to air quality in the area. Fine particulate matter (PM), especially PM10 and PM2.5 are generated and emitted by various combustion processes and can penetrate deep into the lungs, posing significant health risks. In addition to PM emissions, noxious gasses such as Nitrogen oxides (NOx) and Carbon Monoxide (CO), Sulphur Dioxide (SO₂), all generate form combustion operations and burning of fossil fuels also negatively impact air quality leading to ozone depletion and finally global warming. Reducing them is therefore beneficial not only for people’s health but also for climate change mitigation.

Air quality in and around Cape Town is considered to be moderate to good for about 10 months of the year. This means that the recorded figures are between 12 and 35 µg/m³. May to August tends to record the worst figures of between 35 and 54 µg/m³ which classified it as being “Unhealthy for sensitive groups”.



The air quality not only differs from month to month, but it can change daily, depending on the weather conditions and other factors.

Potential sources of pollutants which may be of importance in terms of impact potentials include fugitive emissions from industrial and miscellaneous operations such as wind erosion of open areas, vehicle-movement of dust along paved and unpaved roads, vehicle exhaust emissions and unregulated burning of fossil fuels by informal settlements for cooking and heating during the colder months.

Since South Group propose to undertake the planned recycling, recovery and treatment activities within an existing warehouse, no additional construction will be required. No earth moving or surface area clearance will be required. Operations will be undertaken within the warehouse structure, limiting potential emissions to the ambient atmosphere. Crushing and screening operations will be undertaken under suited vacuum filters which will act as abatement prior to the release of possible PM emissions during operation. The only other impact anticipated would be from vehicle emissions associated with the transport of materials and product.

9. PLAN OF STUDY FOR THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

A comprehensive impact assessment will be conducted to assess the significance of the potential environmental impacts associated with the proposed waste management activities to be undertaken by South Group at their Cape Town facility.

Reasonable and feasible alternatives will also be included in the assessment with focus on location, technology and the no-go alternative.

9.1. Assessment Methodology

A standardised assessment methodology was developed which will be utilised in determining the significance of impacts associated with the proposed activities to be undertaken by South Group Recycling at their Cape Town facility. Impacts from the proposed operations on the biophysical and socio-economic environment are explained in the following sections. The methodology is broadly consistent to that described in Integrated Environmental Management Series.

In order to assess each impacts significance as objectively as possible, the criteria as per the 1998 Department of Environmental affairs and Tourism (DEAT) guidelines and the 2002 DEAT Information Series document were used as the basis for the assessment methodology adopted by LexEco.

The methodology applied to the assessment of the significance of potential impacts is based on the assessment criteria provided within the 1998 DEAT guidelines and the 2002 DEAT Information Series

document (Impact Significance, Integrated Environmental Management, Information Series 5). The methodology has been adapted to be more user friendly and applicable to the proposed waste management activities and planned process, which is focused on the nature, extent, duration, intensity, probability of the identified impact.

The significance of each impact is determined through a synthesis of these criteria, ranking them as follows;

Table 10: Risk Classification

Significance Rating (SR)	Significance
0 - 49	Insignificant
50 - 99	Low
100 - 149	Moderate
150 - 199	High
200 <	Severe

For each impact identified, the Significance Rating (SR) is determined by various factors. Significance is described prior to mitigation as well as with the most effective mitigation measure(s) in place where so required.

The Significant Rating or Risk prior to the implementation of appropriate and reasonable mitigation is calculated as follows;

<i>Significance Rating (SR) = (Duration + Probability + Extent) x Severity</i>

Duration: *Timeframe of the impact (how long will it last)*

Probability: *Likelihood (chance) of the event occurring*

Extent: *Scale of the impact (how far will the impact reach)*

Severity: *Degree to which the impacts can change the environment*

A risk rating value is assigned according to the following criteria;

Table 11: Marks Awarded to Duration

Duration	Guideline	Assigned Value
Permanent	Permanent	10
Long Term	As long as the facility is in operation	7
Medium Term	5 - 10 years	5
Short Term	0-4 years	3

Table 12: Marks Awarded for Probability

Probability	Guideline	Assigned Value
Definite	The impact will occur regardless of any prevention measures (100% probability rate)	10
Highly Probable	The impact is highly likely to occur (70% to 90% probability rate)	8
Probable	The impact is likely to occur (40% to 70% probability rate)	6
Improbable	The impact will occur very rarely (less than 40% of the time).	3
Impossible	The impact will not occur. No risk	0

Table 13: Marks Awarded to Extent

Extent	Guideline	Assigned Value
International	Impact will result in international impacts	10
National	Impact will result impact on a national scale	9
Regional	Impact will result impact on a provincial or regional scale	7
Local	Impact will result impact on a local or municipal area scale	5
Immediate	The impact will be localised only to the project site	3

Table 14: Marks Awarded to Severity

Severity	Guideline	Assigned Value
Highly Significant	Impact will cause irreversible damage	20
Severe	The impact will interfere with natural or social functions and processes which will be altered to the extent where they could temporarily or permanently cease	15
Major	The impact will interfere with natural or social functions and processes that will have to be modified in order to continue with operation.	10
Minor	The impact will not interfere with natural or social functions but be localised to the operational site.	5

Impacts without mitigation measures are not considered representative of the proposed project's actual extent of impact. The residual impact is what remains following the application of mitigation measures and is thus the final level of impact associated with the development. Residual impacts also serve as the focus of management and monitoring activities during project implementation to verify that actual impacts are the same as those predicted in this report.

Mitigation measures are based on the mitigation sequence/hierarchy which allows for consideration of five (5) different levels, such as avoidance or prevention, minimisation, rehabilitation or restoration, offset and no-go.

The mitigation sequence or hierarchy as followed is presented in Figure 7 below.



Figure 13: Mitigation Hierarchy

Calculation of the Residual Risk Rating is calculated as follows;

$$\text{Residual Risk Rating (RRR)} = (\text{Duration} + \text{Probability} + \text{Extent}) \times \text{Severity} - (\text{Mitigation} + \text{Degree to which the impact can be reversed})$$

Mitigation: Actions taken to lessen or eliminate the negative impacts of a hazard, project, or risk.

Degree to which the impact can be reversed:

The chance that the impact can be reversed by applying mitigation measures

Table 15: Marks Awarded to Mitigation

Mitigation	Guideline	Assigned Value
Engineering controls	A physical control or measure implemented to avoid or minimise the impact. Examples include construction and design measures	-10%
Administrative	Administrative measures such as procedures, policies, training or work instructions that guide and or manage the Activity	-5%

Table 16: Degree to which an Impact can be Reversed

Degree	Guideline	Assigned Value
High	The impact can easily be reversed by applying little effort	-8%
Medium	The impact can be reversed by applying effective mitigation measures	-6%
Low	The chance of revering the impact is low. However, by applying extensive measures the impact can be reversed.	-4%
None	The impact cannot be reversed	-0%

Any potential impact with a Risk Rating (SR) above “*medium risk*” must be assigned a mitigation measure to mitigate the identified impact. In this case, most of the impacts have been determined as a low or medium impact, mitigation measures were however still assigned from a responsible corporate citizen and precautionary approach principal.

Impacts as well as recommended mitigation measures will be incorporated into the Environmental Management Programme (EMPr) document as part of the EIR phase of this application. Implementation will become the responsibility of the applicant.

10. ANTICIPATED IMPACTS AND PROPOSED MITIGATION MEASURES

Table 16 below summarises the preliminary environmental impacts identified in association with the operational facility as part of the Scoping Process.

Effective implementation of proposed mitigation measures will reduce the significance of the potential environmental impacts associated with the activities. Therefore, the residual risk will be lower after mitigation measures have been applied.



All identified aspects and impacts will be assessed in detail, following the methodology set out above during the EIR phase of this application. Outcomes and recommended mitigation measures will then be compiled into an Environmental Management Programme and submitted to the competent authority for consideration and approval.

10.1. Aspects to be Assessed as Part of the Impact Assessment Process

- Air Quality
- Soil and water resource impacts
- Noise
- Traffic impacts
- Waste Management
- Socio Economic Impacts
- Recovery and Recycling of Valuable Resources

Table 17: Identified Impacts and Recommended Mitigation Measures

Environmental Aspect	Potential Impacts	Anticipated SR	Proposed Mitigation Measures	Anticipated RRR
Air Quality	Fugitive dust emissions from waste processing activities	Moderate	<ul style="list-style-type: none"> Undertake regular servicing of equipment and vehicles to ensure that all equipment is in good working condition Where possible make use of fuels with a lower sulphur content 	Low
	Exhaust emissions from vehicles and equipment	Low		Insignificant
Noise	Noise generated from vehicles and machinery leading to nuisance conditions to surrounding landowners, occupants and operations	Low	<ul style="list-style-type: none"> All waste related activities are to be contained within the bounds of the approved warehouse which will act as a screen and limit noise disturbance. Employees are to be equipped with noise protection and relevant PPE when undertaking work in high noise areas Employees are to be trained on the use of appropriate PPE of, and risks associated with noise induced hearing loss. 	Insignificant
	Noise induced hearing loss	Moderate		Low
Traffic	Route congestion	Moderate	<ul style="list-style-type: none"> All vehicles must be certified and comply with relevant traffic acts Drivers must be dually licensed for the vehicle to be driven and or equipment to be operated. Transporting vehicles must not be overloaded. Transporting vehicles must abide by all traffic rules and laws Loads leaving the site must be covered in such a way as to limit the loss of material during transit 	Low
	Degradation of road networks and infrastructure	Moderate		Low

Environmental Aspect	Potential Impacts	Anticipated SR	Proposed Mitigation Measures	Anticipated RRR
Surface Water, Ground Water and Wetlands	Uncontrolled or accidental release of dirty or contaminated storm water, effluent or leachate to a natural water resource such as a local stream or canal which will lead to contamination of surface water, ground water and possibly wetlands in the area.	High	<ul style="list-style-type: none"> All waste material is to be stored under a roof on paved surfaces. Storm water infrastructure must be maintained. Waste must not come into contact with waste. 	Low
Waste Management	Inappropriate handling and storage of waste material, including e-waste leading to soil or storm water contamination due to leachate generation.	High	<ul style="list-style-type: none"> Develop a waste management plan to be implemented during the operational phase Train employees on appropriate handling and management of waste materials Limit the mixing of waste by labelling waste containers, bins and or storage areas 	Low
	Mixing of waste, reducing recycling and or recovery potential	High	<ul style="list-style-type: none"> Limit the mixing of waste by labelling waste containers, bins and or storage areas 	Low
	Reduction of waste by recycling recovering and treating e-waste and spent catalytic convertors and avoidance of landfill disposal	Positive Impact	No mitigation required. Positive Impact	Positive Impact
Socio-Economic	Creation of employment opportunities	Positive Impact	No mitigation required. Positive Impact	Positive Impact
	Job security to already employed persons			
	Skills development			
Recovery and Recycling of Valuable Materials	Supported recovery of precious metals from a waste material	Positive Impact	No mitigation required. Positive Impact	Positive Impact
	Generation of recyclable materials such as plastic, glass and precious metals used by alternative industries for the manufacturing of quality goods and products			



11. SPECIALIST STUDIES AND ASSESSMENTS

No specialist assessments or studies will be included in the Environmental Impact Assessment Phase of the application process.

Refer to Section 2.4.1 for a summary and motivation for not including any specialist assessments and **Annexure G** of this report for a copy of the site verification report.

12. CUMULATIVE IMPACTS

Potential preliminary cumulative impacts that have been identified, based on the Project description and existing activities within the Project area and include the following:

- Emissions due to operational equipment and machinery, impacting on overall ambient air quality in the area.
- Nuisance noise due to operational equipment and movement of vehicles.
- Potential impacts from improper materials handling, offloading and onloading of material on groundwater and surface water.
- Traffic-related impacts on the local road network due to the operation of the warehouse.
- Socio economic impacts relating to job security, job creation and skills development.

All cumulative impacts will be assessed in detail during the EIR phase. Based on the outcomes, relevant mitigation measures will be assigned and included in the EMP that South Group will be required to implement in order to avoid negative impact and/or minimise the significance of the impacts identified.

13. PUBLIC PARTICIPATION

A comprehensive public consultation process will be undertaken during both the Scoping Phase as well as the Impact Assessment Phase of this application. The aim of any Public Participation Process is to inform Interested and or Affected Parties ("**I&APs**") of the application and planned project and to allow them to raise any concerns or to provide comments and or insights.

This section will elaborate on the methods to be implemented to inform potential I&APs of the application and proposed project. Upon conclusion of each Public Participation Process, records of correspondence as well as all comments and responses will be summarised and included in the Final Scoping Report as well as the Final Environmental Impact Assessment Report ("**EIR**").



13.1. Identification and Registration of I&AP's

In order to ensure an efficient and effective public participation process, potential IAPs will be identified, which will include;

- The occupants of the site.
- The owner of the site.
- The owners, persons in control of, and occupiers of the land adjacent to the site where the activity is to be undertaken.
- The municipal councillor of the ward in which the site is situated and any organization of rate payers that represent the community in the area.
- The municipality which has jurisdiction in the area.
- Any organ of state having jurisdiction in respect of any aspect of the activity.
- Any other party as required by the Competent Authority.

A database of I&APs will be developed for the application process by conducting internet and media searches of the area as well as a site visit during which surrounding landowners, businesses and residential holdings will be identified. Where available, existing I&AP databases for the facility will also be incorporated.

A Windeed search will be conducted on the properties adjacent to the site in order to identify the vacant landowners or unknown landowners surrounding the site.

Organs of state such as the Department of Water and Sanitation ("**DWS**"), Department of Forestry, Fisheries and the Environment ("**DFFE**") (Competent Authority in respect to this application), Department of Environmental Affairs and Development Planning ("**DEADP**") and the City of Cape Town Metropolitan Municipality will also be included.

Other stakeholders such as the Ward Councillor and surrounding businesses in the area will also be included as potential I&AP's.

Each identified I&AP will be provided with a written notice (either electronically or in hard copy) of the application and be made aware of the availability of the Draft Scoping Report in support of this application for review and comment. All parties will be invited to register as interested and affected parties in respect to the application.

Refer to Table 17 below for a restricted summary of the preliminary IAP register (Personal information restricted in compliance with the POPIA. All information to be included in Final coping Report).

As the Public Participation Process continues the IAP Register will be updated and relevant stakeholders included. A full register, inclusive of all contact details will be included in the Final Scoping Report.

Table 18: IAP Register (Restricted)

Department / Representative	Contact Person	Tel	Email	Postal / Physical Address	Registered as IAP
State Departments and Relevant Authorities					
Department of Forestry Fisheries and the Environment <i>(Competent Authority)</i>	Chief Directorate				✓
Department of Forestry Fisheries and the Environment	Hazardous Waste Management				
Western Cape Government Department of Environmental Affairs and Development Planning	Directorate: Development Management (Region 1)				
City of Cape Town Municipality	Environmental and Heritage Management Branch				

Department / Representative	Contact Person	Tel	Email	Postal / Physical Address	Registered as IAP
City of Cape Town Municipality	Ward Councillor Subcouncil 3 Manager Roxanne Moses				
Heritage Western Cape Heritage Resource Management	Michael Janse van Rensburg Corne Nortje				
South African Civil Aviation Association Authority	Aviation Environmental Compliance				
National Department of Defence	Mr S.M Dlamini Brig Gen A.M. Mahapa Col R. Maseko Capt B.M. Raphela Mr T.V. Mthombeni				
Precious Metal Regulator	Mmathabo Mngadi				

Department / Representative	Contact Person	Tel	Email	Postal / Physical Address	Registered as IAP
Landowners and Local Stakeholders					
Landowner BZK Trust	Baruch Katz				✓
Barpro Storage SA	Reception				
Cape Office Furniture	Managing Director				
Project Pumps	Director Justin Grootman				
Momentum Logistics	-				
Clover S.A. (Pty) Ltd	-				
Traders Warehouse	-				
Nor Marine Cape Town	-				
Calpeda Pumps Southern Africa Pty Ltd	-				



Department / Representative	Contact Person	Tel	Email	Postal / Physical Address	Registered as IAP
Perfect View Solutions	Peter Jones				
Turner Morris	-				
Crest	-				
Helukabel SA	-				
Thermo Solutions	-				
SA Sealing Systems	-				
Nimpex	-				
B&S Agencies (Pty) Ltd	-				
Gasket and Shim Industries	-				
Vulcan Steel	-				



Department / Representative	Contact Person	Tel	Email	Postal / Physical Address	Registered as IAP
Pinnacle ICT Cape Town	-				
Prime Cleaning Supplies	-				
Farber Coachworks Montague Gardens	-				
IB Corr	-				
Nouum Engineering Pty Ltd	Jonathan Sproat				
Afrigen Biologics & Vaccines	Rajen Naidoo Petro Terblanche				



13.2. Newspaper Advertisements

An advertisement containing relevant information with regards to the application and proposed project will be placed in one (1) local newspaper, namely the Cape Times, which is circulated in the area relevant to the application.

13.3. Site Notices

Site notices will be placed at locations visible to the public within the surrounding project area.

13.4. Written Notices and Background Information Document (BID)

A written notice, accompanied by a Basic Information Document (“**BID**”) containing relevant information with regards to the applicant and location and scope of the proposed project will be distributed to identified IAP’s by means of the following methods:

1. Email;
2. Hand delivery to surrounding businesses and operations;
3. Registered mail (only where no email address is available or where a written notice could not be delivered by hand to the interested party’s business or residential address)

13.5. Circulation of the Draft Scoping Report

A copy of the Draft Scoping Report will be made available to the public for review and comment by setting out a hard and or soft copy of the report at the following locations;

- **Hard Copy:** South Group Recycling, Cape Town, Administrative Office
Unit 2, Marconi Estate, 2 Warbler Cl, Montague Gardens, Cape Town
- **Electronic Copies:** www.lexeco.co.za (for download)
info@lexeco.co.za (on request)

Electronic copies of the Draft Scoping Report will also be submitted to relevant Commenting Departments, as well as the Competent Authority (DFFE) for review and comment during the public participation period.

Records of public participation undertaken and distribution of the Draft Scoping Report will be included in the Final Scoping Report to be submitted to the Competent Authority for consideration.



13.6. Comments and Responses

All the comments and or responses received during the Public Participation Process will be summarised in a single report. The aim of the report is to provide proof of the Public Participation Process undertaken all records of communications as well between the EAP and relevant stakeholders. A copy of the comments and responses report along with records of the Public Participation Process will be included in the Final Scoping Report under **Annexure C**.

14. EIA PROCESS

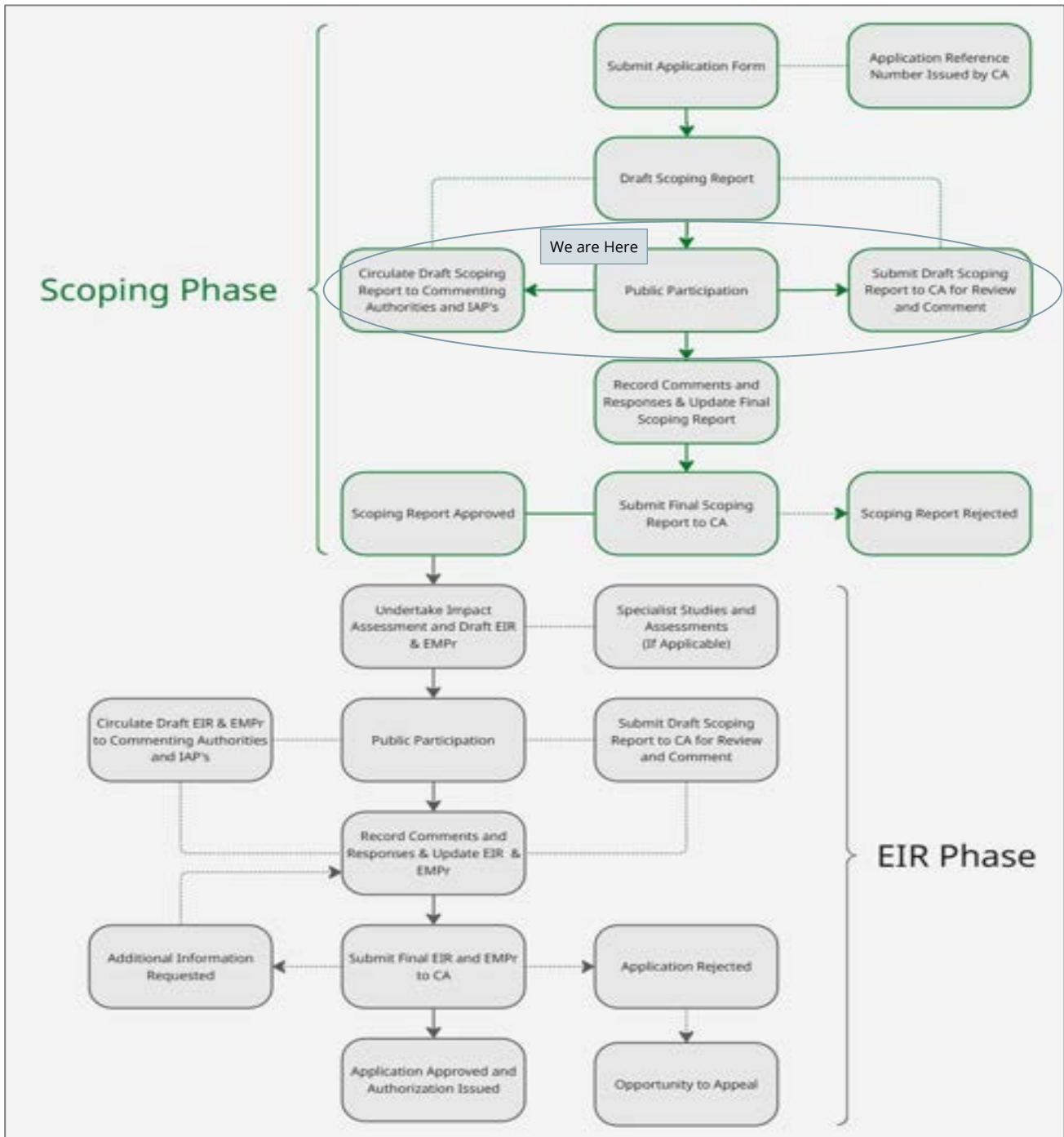
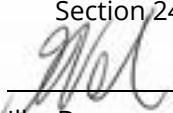


Figure 14: Full Scoping EIA Process Flow

15. DECLARATION OF ENVIRONMENTAL ASSESSMENT PRACTITIONER

I, Ilke Degenaar Nel, as an independent consultant compiled this report and declare that it correctly reflects the findings made. I further declare that I,

- Act as the Independent Environmental Practitioner who is responsible for the compiling of this Scoping Report;
- Conducted all work relating to this report in an objective manner even when this results in views and findings that is not favourable to the applicant;
- Declare that there are no circumstances that may compromise my objectivity in performing such work;
- Have the necessary expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any other guidelines that have relevance to the activity;
- Will comply with the Act, Regulations and all other applicable legislation;
- Will take into account, to the extent possible, the matters listed in the EIA regulations as published in Government Notice R982 as well as other legislation;
- Have no, and will not engage in, conflicting interests in the undertaking of the activity;
- Undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- Will ensure that the comments of all interested and affected parties have been considered and are recorded in this report that is submitted to the competent authority in respect of the application;
- Have kept a register of all interested and affected parties that participated in the public participation process;
- Have provided the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not;
- Declare that all the particulars furnished by me in this report are true and correct;
- Declare that no information provided to the Department was at no stage influenced by the applicant and that I as the appointed Environmental Assessment Practitioner have explained the potential consequences of submitting this application;
- Will perform all other obligations as expected from an EAP in terms of the Regulations; and
- Realise that a false declaration is an offence in terms of Regulation 71 and is punishable in terms of Section 24F of the Act.


Ilke Degenaar Nel
Environmental Assessment Practitioner
EAPASA Registration Number 2019/711

16. CONCLUSION AND RECOMMENDATIONS

South Group Recycling (Pty) Ltd operates an existing waste storage and transfer facility in Montague Gardens, Cape Town where electronic waste and spent catalytic converters are received, manually sorted and exported. The proposed expansion to include recycling, recovery and treatment activities will be undertaken entirely within the footprint of the existing, industrially zoned warehouse, with no additional development required other than the installation of processing equipment.

The proposed activities trigger Category B listed activities in terms of Government Notice 921 under the National Environmental Management: Waste Act, 2008, and therefore require a full Scoping and Environmental Impact Assessment process. The Scoping Report has identified potential environmental and socio-economic impacts, primarily relating to air quality, soil, water, traffic and socio-economic factors.

Based on the use of an existing industrial facility, the absence of natural vegetation, and the confinement of operations to paved areas within the warehouse, the Environmental Assessment Practitioner has concluded that no specialist studies are required. All identified impacts will be assessed in detail during the Environmental Impact Reporting phase, and appropriate mitigation measures will be incorporated into the Environmental Management Programme.

Failure to approve the application may result in increased illegal disposal of e-waste, reduced waste management capacity, and negative socio-economic impacts, including potential job losses. It is therefore recommended that the application proceed to the EIA phase for further assessment.



Annexure A: EAP Qualifications and CV

Curriculum Vitae for Ilke Nel

Environmental Consulting;
Environmental Compliance;
Environmental Control.

40 Blackberry street, Zwartkop x4, Centurion, South Africa.

Tel +27 (72) 6976266 | ilke2010@live.com



Overview and Profile

Ilke is a qualified Environmental Manager (Honours) with over 15 years of experience in mining and non-mining related resources.

Ilke established Eco Resource Managers (2016–2025) and undertook a broad spectrum of environmental consulting work for various projects, including mining, residential and commercial developments, infrastructure development, agriculture, and dam projects.

She was employed as the Principal Environmental Manager at Shangoni Management Services (2022-2024). This role will allow her to be actively involved in all aspects of mining-related closures, environmental management, and water use licences.

Ilke gained valuable practical experience at SRK Consulting in Pretoria (2011-2016). She worked on numerous large-scale EIA projects, gaining extensive experience in every aspect of EIA and environmental management planning. She has obtained a certificate in Mine Closure and Land Rehabilitation from the University of Pretoria.



Education and Skills

BA. Hons. Environmental Management – University of the South Africa	2016
BA. Environmental Management – University of the South Africa	2008
Mine Closure and Land Rehabilitation – University of Pretoria	2022



Professional Affiliations

Registered as Professional Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP) in the fields of Environmental Science (Professional Natural Scientist).

Registered Environmental Assessment Practitioner with the Environmental Assessment Practitioner Association of South Africa (EAPASA).



Work and Project Experience

Company: Shangoni Management Services
Position: Principal Environmental Consultant
Experience in field: 15 Years

Key responsibilities:

Consulting services in all aspects of environmental management are provided to mining and non-mining clients. Services include:

- Mine Rehabilitation documentation;
- Environmental Authorisations; (Environmental Impact Assessments and Basic Assessments);
- Water Use License Applications;
- Integrated Water and Waste Management Plans;
- Monitor and report on compliance against the approved environmental management plan and the environmental authorisation;
- Environmental Legislation;
- Public Participation;
- Environmental Management Plans;
- Environmental Monitoring and Auditing;



Declaration of Content

I, the undersigned, certify that to the best of my knowledge and belief, these data correctly describe my qualifications, my experience, and me.

Reference:

Mr. Nico Brits. Current employee at RSK Dubai. +97148358006 (office)

Ms. Manda Hinsch Associate Partner/Principal Scientist at SRK Consulting, South Africa: +27 82 808 9938

Date: 2 June 2025

Ilke Nel

EAPASA: 2019/711

Pr.Sci.Nat: # 119935



Annexure B: Site Maps

South Group Recycling (Cape Town) : Zoomed Locality Map (1: 50 000)



Legend

- ▲ South Group Recycling
- Major Roads
- Places
- 5 Km Buffer
- Boundary

Corners:

- A= 33°51'58"S; 18°30'48"E
- B= 33°52'00"S; 18°30'49"E
- C= 33°52'00"S; 18°30'48"E
- D= 33°51'59"S; 18°30'48"E



Client: South Group Recycling
Author: CJD Tolken
CRS: WGS 84



South Group Recycling (Cape Town) : Topographic Map (1: 70 000)



Legend

- ▲ South Group Recycling
- 5 Km Buffer



Client: South Group Recycling
Author: CJD Tolken
CRS: WGS 84

LEXeco



South Group Recycling (Cape Town) : Locality Map (1: 50 000)



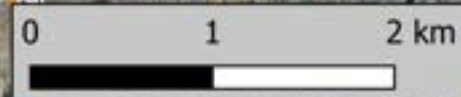
Legend

- ▲ South Group Recycling
- Major Roads
- Places
- 5 Km Buffer

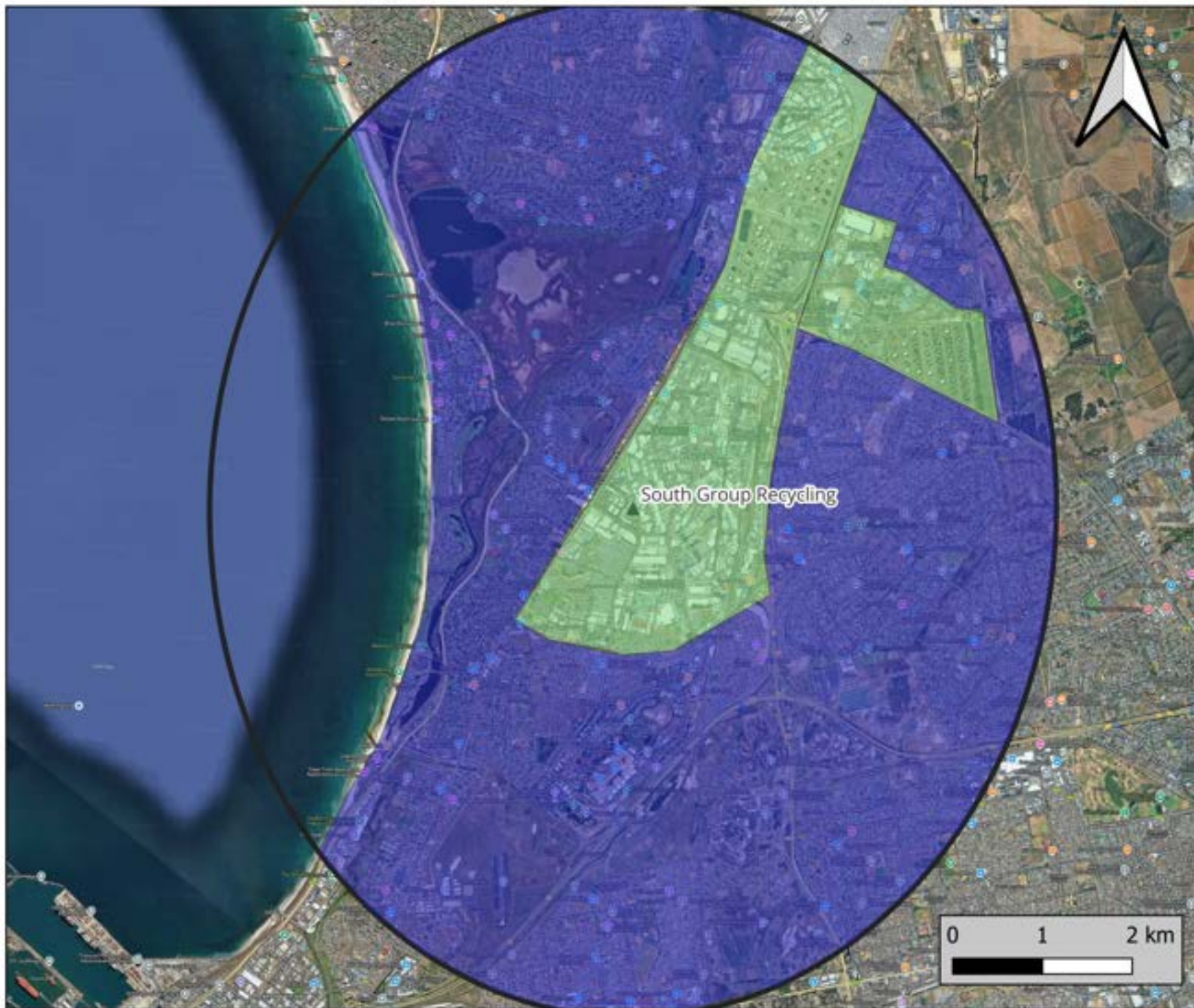


Client: South Group Recycling
Author: CJD Tolken
CRS: WGS 84

LEXeco



South Group Recycling (Cape Town) : Land Use Map (1: 70 000)



Legend

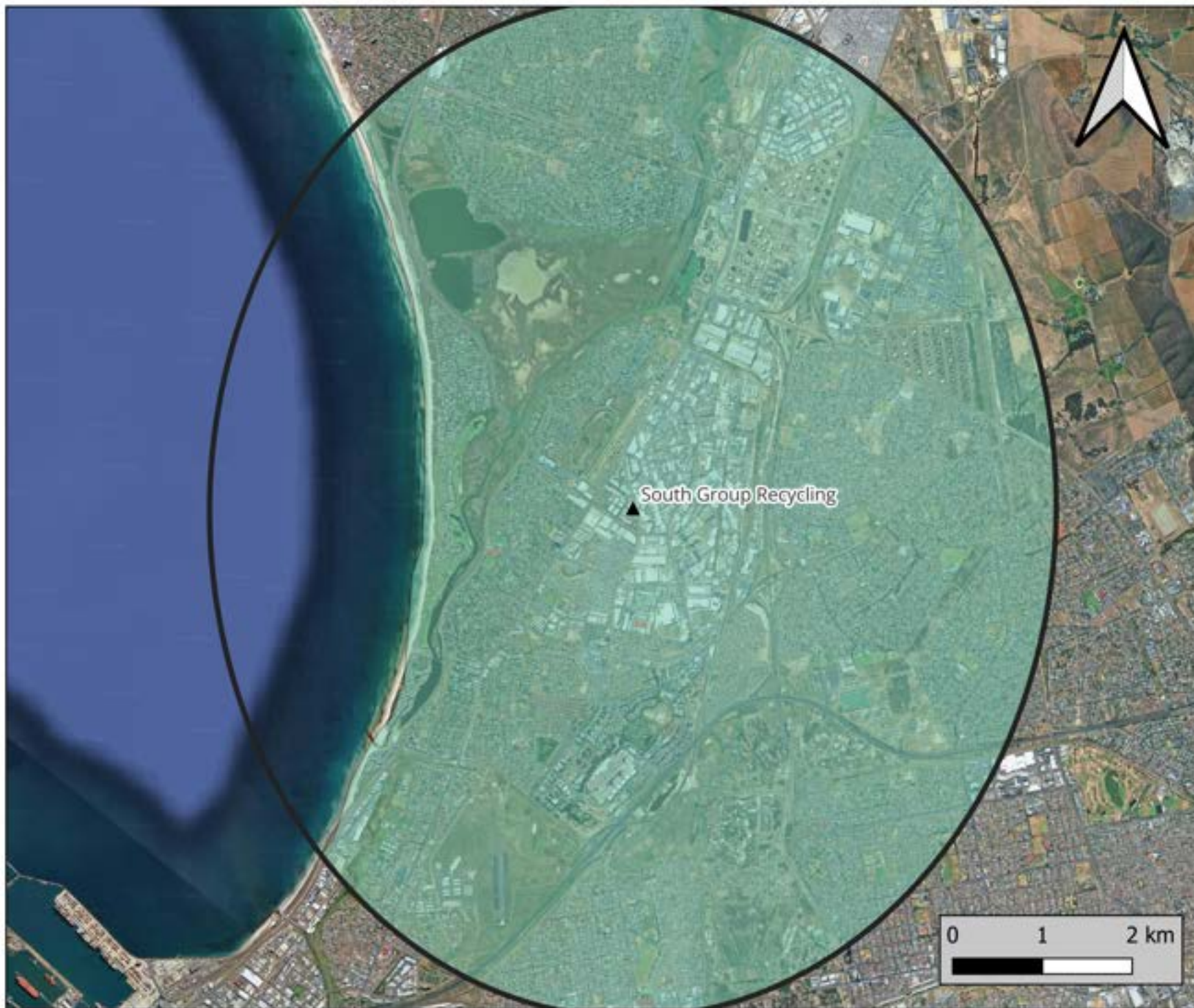
- ▲ South Group Recycling
- ◻ 5 Km Buffer
- Land Use
 - Industrial
 - Residential



Client: South Group Recycling
Author: CJD Tolken
CRS: WGS 84

LEXeco

South Group Recycling (Cape Town) : Geology Map (1: 70 000)



Legend

- ▲ South Group Recycling
- 5 Km Buffer
- Geology
 - Siliciclastic rocks



Client: South Group Recycling
Author: CJD Tolken
CRS: WGS 84

LEXeco

South Group Recycling (Cape Town) : Vegetation Map (1: 70 000)



Legend

▲ South Group Recycling

□ 5 Km Buffer

Vegetation

■ Cape Flats Dune Strandveld

■ Cape Flats Sand Fynbos

■ Cape Seashore Vegetation

■ Non-terrestrial
(estuarine habitat)

■ Swartland Shale
Renosterveld



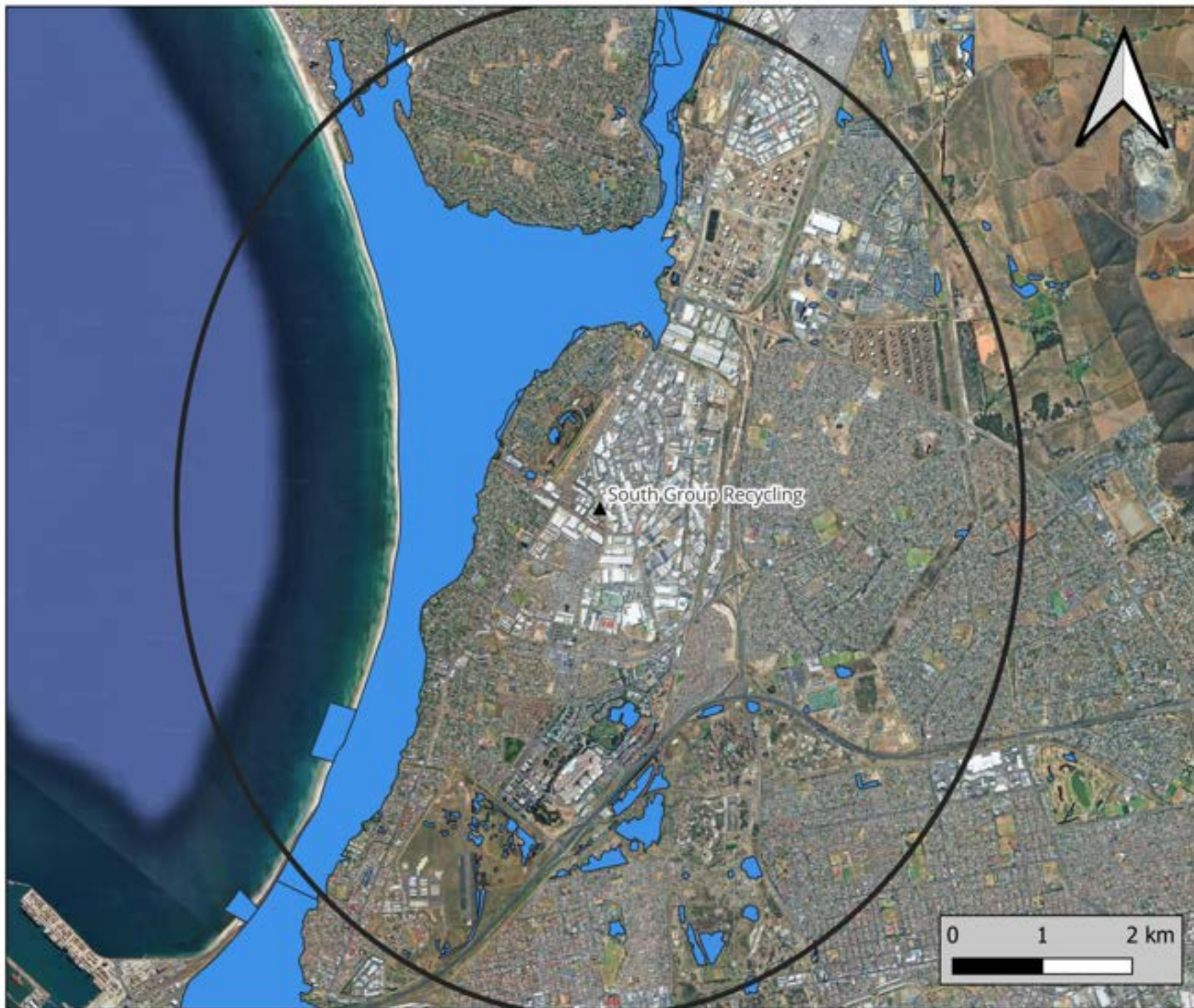
Client: South Group Recycling

Author: CJD Tolken

CRS: WGS 84

LEXeco

South Group Recycling (Cape Town) : Wetlands Map (1: 70 000)



Legend

- ▲ South Group Recycling
- 5 Km Buffer
- Wetlands



Client: South Group Recycling
Author: CJD Tolken
CRS: WGS 84

LEXeco



Scale 1:500



+ 10 114 - 32 966 Degrees

Identify

Identify

Results

Clear

Spatial

Links

Property - Registered

Zoom

Report

Property Number	20674
Allotment Name	MLNERTON
ISIS Key	253005
Legal Status SG	Registered
Zoning Description	General Industrial 1
Vested Type	No Vesting
Addr No	2
Address No Suffix	
Street Name	WARBLER
Street Name Type	Close
Official Suburb Name	MARCONI BEAM
Subcouncil Name	Subcouncil 3
Ward Name	4
SG26 Code	C0160034000206740000000000
Status	Official
SHAPE.STArea()	3057.264535

Elevation_Height_Map_1m



Elevation_DTM_5m



Elevation_DTM_2m



Elevation_CCT_GLM2019_5m_DEM



Elevation_DTM_10m







Annexure C: Public Participation

To be included in Final Scoping Report



Annexure D: Proof of Application for Registration in terms of the National Norms and Standards

From:	"Bongani Mashika"
To:	"Riette Landsberg" <Riette@lexeco.co.za>
Date:	1/19/2026 10:24:10 AM
Subject:	Re: Application for the Registration in terms of the Norms and Standards - South Group Recycling Cape Town

Dear Riette Landsberg,

Kindly be aware that your application is under review, and we will inform you of the outcome in the near future. For any future enquiries regarding the relevant application, do not hesitate to reach out to the office or Ms. Bongani Mabunda who is Cc'd on this email.

Regards,

Mr Bongani Mashika

Directorate: Licensing

Department of Forestry, Fisheries and the Environment

Environmental House

473 Steve Biko Road

Arcadia Ext 6

Pretoria

0001

Email: bmashika@dffe.gov.za



From: Riette Landsberg <Riette@lexeco.co.za>

Sent: Monday, January 19, 2026 10:42 AM

To: Licensing <licensing@dffe.gov.za>

Cc: Bongani Mabunda <BMabunda@dffe.gov.za>; Gerron Fraser <Gerron@bishopfraser.co.za>; Gabriel Lidchi <Gabriel@bishopfraser.co.za>

Subject: Re: Application for the Registration in terms of the Norms and Standards - South Group Recycling Cape Town

To whom it may concern,

On the 8th January 2025, an application for the registration of South Group Recycling, Cape Town was submitted.

To date we have not received acknowledgement.

We would please like to confirm that the application was received in good order.

Should the Department require any additional information, please feel free to contact us at any time.

Your feedback is appreciated.

Kind regards,

Riette Landsberg

Environmental Consultant



M: +27(0)76 099 1290 | T: +27(0)10 023 8543 | E: riette@lexeco.co.za

LexEco | Registration Number 2020/642/160/07

From: Riette Landsberg <Riette@lexeco.co.za>

Sent: Thursday, January 08, 2026 13:51

To: Licensing <licensing@dffe.gov.za>

Cc: BMabunda@dffe.gov.za <BMabunda@dffe.gov.za>; Gerron Fraser <Gerron@bishopfraser.co.za>; Gabriel Lidchi <Gabriel@bishopfraser.co.za>

Subject: Application for the Registration in terms of the Norms and Standards - South Group Recycling Cape Town

To whom it may concern,

Please find attached a copy of an application for the registration of the South Group Recycling - Cape Town facility in terms of the Norms and Standards for the;

1. Storage of Waste (GN 926)
2. Sorting, Shredding, Grinding, Crushing, Screening, Chipping or Baling of General Waste (GN 1093).

Should the Department require any additional information please feel free to contact us at any time.

Kind regards,



Riette Landsberg
Environmental Consultant



M: +27(0)76 099 1290 | T: +27(0)10 023 8543 | E: riette@lexeco.co.za
A: 11 Alice Lane, Building 3, 5th Floor, Sandton, Johannesburg, 2196

LexEco | Registration Number 2020/642/160/07



Department of Forestry, Fisheries and the Environment
Environment House
Cnr. Steve Biko (previously Beatrix Street) and Soutpansberg Road,
473 Steve Biko,
Arcadia, Pretoria,
0083

8 January 2026

Application for registration in terms of the National Norms and Standards for the Storage of Waste (GN 926) and the National Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening, Chipping or Baling of General Waste (GN 1093) by South Group Recycling (Pty) Ltd, Cape Town

South Group Recycling (Pty) Ltd (South Group Recycling) operates a waste storage and transfer facility located at 2 Warbler Close, Montague Gardens, Cape Town and falls within the jurisdiction of the City of Cape Town Metropolitan Municipality.

South Group Recycling currently accepts and trades different grades of electronic waste, also referred to as e-waste (inclusive of PC boards, electronic boards, computers, phones, appliances and electronics), spent catalytic convertors and ferrous and non-ferrous scrap metal, which is temporarily stored, sorted and before being repackaged and exported. Small volumes of general waste are also temporarily stored on site prior to collection by approved service providers and include plastic, paper and cardboard.

LexEco (Pty) Ltd has been appointed by South Group Recycling to facilitate the application for registration in terms of the National Norms and Standards for the Storage of Waste (GN 926) and the National Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening, Chipping and Baling of waste (GN 1093).

Please find attached a copy of the application form along with supporting documents. Should the Department require any additional information please contact us at any time.

Kind regards,

A handwritten signature in black ink, appearing to read "R. Landsberg", is written over a horizontal line.

Riette Landsberg
Environmental Consultant
LexEco Pty (Ltd)

LEXECO PTY LTD | ENVIRONMENTAL & LEGAL CONSULTANCY
LEGAL INSIGHT. SUSTAINABLE IMPACT.

+27 (010) 023 8543 | info@lexeco.co.za | lexeco.co.za
11 Alice Lane, Building 3, 2nd Floor, Sandton, Johannesburg, 2196



forestry, fisheries & the environment

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

www.environment.gov.za

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

WASTE MANAGEMENT FACILITIES REGISTRATION FORM

FOR OFFICE USE ONLY

Date Application Form Received:			
Outcome of Evaluation of the application form	Accepted	Not accepted (provide reasons)	
DEA Registration Number:			

NB: Fields with asterisk * are compulsory; if not completed, the registration will be rejected immediately.

THIS REGISTRATION FORM NEEDS TO BE COMPLETED FULLY AND ANY FALSE INFORMATION PROVIDED WILL INVALIDATE THE APPLICATION AND RESULT IN REJECTION OF THE REGISTRATION

SECTION A: DETAILS OF THE OWNER OF THE WASTE MANAGEMENT FACILITY:

The following contact information will be used to create the Central Registry User for the site. All notifications pertaining to the facility will be sent to this person.		
Company Name:	*	South Group Recycling Proprietary Limited
Contact Name:	*	Wayne Gareth Clancy
Email:	*	wayne@south-group.co.za admincpt1@south-group.co.za
Telephone:	*	071 7617 262
Cell phone	*	071 7617 262
Fax Number	*	None

Postal Address:	*	2 Warbler Close Road Unit 2, Montague Gardens, Cape Town		
Postal Code	*	7442		
SECTION B: DETAILS OF THE WASTE MANAGEMENT ACTIVITY				
Please select the name of the activity for which registration is required by ticking the appropriate box(es) below				
* When did the activity commence, if commencement has taken place?				
		2021	02	01
Storage of Waste	*	X		
Extraction, Flaring or Recovery of Landfill Gas	*			
Scrapping or Recovery of Motor Vehicles	*			
Composting of Organic Waste	*			
The Sorting, Shredding, Grinding, Crushing, Screening or Baling of General Waste	*	X		
Treatment of Organic Waste	*			
SECTION C: SITE INFORMATION:				
Site Name:	*	South Group Recycling Cape Town		
Site Telephone Number:	*	083 6962 042		
Owner (company or municipality name):	*	Company		

Owner VAT Registration Number (if applicable):		4020295244															
Public Commercial:	or *	Commercial															
Province:	*	Western Cape															
Municipality:	*	City of Cape Town Metropolitan Municipality															
Degrees Latitude: Degrees Longitude: (Please provide the geographic co-ordinates of all external corner points of the site (i.e the Waste Management Facility, and not the whole complex)) in Degrees, Minutes and Seconds (<i>no other format is acceptable</i>)	*	<table border="1"> <thead> <tr> <th>Corner ID</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>33°51'58.89"S</td> <td>18°30'48.94"E</td> </tr> <tr> <td>B</td> <td>33°52'0.08"S</td> <td>18°30'49.31"E</td> </tr> <tr> <td>C</td> <td>33°52'0.26"S</td> <td>18°30'48.57"E</td> </tr> <tr> <td>D</td> <td>33°51'59.13"S</td> <td>18°30'48.17"E</td> </tr> </tbody> </table>	Corner ID	Latitude	Longitude	A	33°51'58.89"S	18°30'48.94"E	B	33°52'0.08"S	18°30'49.31"E	C	33°52'0.26"S	18°30'48.57"E	D	33°51'59.13"S	18°30'48.17"E
Corner ID	Latitude	Longitude															
A	33°51'58.89"S	18°30'48.94"E															
B	33°52'0.08"S	18°30'49.31"E															
C	33°52'0.26"S	18°30'48.57"E															
D	33°51'59.13"S	18°30'48.17"E															
Physical Address: Street or Erf	*	2 Warbler Close Road Unit 2, Montague Gardens, Cape Town															
Physical Address: City	*	Montague Gardens, Cape Town															
Physical Address: Postal Code:	*	7442															
Size of the facility	*	800 m ²															
Proximity of the facility to the nearest residential area	*	500 m															
Land use/ zoning (Attach proof)	*	Industrial															
Approved Civil Engineering Designs (Attach, where applicable in terms of relevant building regulations and bylaws)	*	Not Applicable															

***SECTION D: WASTE INFORMATION (This is not applicable to extraction, flaring or recovery of landfill gas)**

Types of waste stream and classification	Quantities	Sources	Final Destination
E-waste (PC Boards, electronic boards, computers, phones, appliances and electronics)	40 tons / month	Various	South Group Recycling - Cape Town
Spent catalytic converters	15 tons/month	Various	
Scrap ferrous and non-ferrous metal	10 tons / month	Various	
Plastic	8 tons/month	Various	Local General Waste Recyclers
Paper / Cardboard	5 tons / month	Various	Local General Waste Recyclers

SECTION E: THE OWNER OF THE WASTE MANAGEMENT FACILITY

I, Wayne Clancy hereby declare that I have read the completed registration form and hereby confirm that the information provided is to the best of my knowledge true and correct.

Furthermore, I declare that I am fully aware of my responsibilities in terms of the National Environmental Management: Waste Act, 2008 (Act 59 of 2008) and failure to comply with these requirements may constitute an offence in terms of the National Environmental Management: Waste Act, 2008 (Act 59 of 2008).

Owner of the Facility (Full names) Wayne Clancy (South Group Recycling (Pty) Ltd
Designation Director

Signature [Signature] (duly authorised to sign on behalf of Owner of the Facility)

Date: 13-11-25 Place: Edenvale.

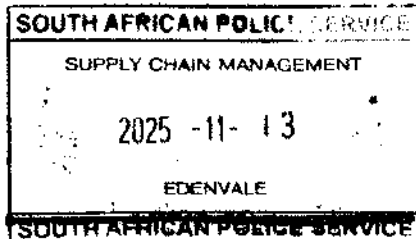
[Signature] 1261832-1
CS-7
MAMTLWA.

Signature of the Commissioner of Oaths:

2025-11-13
Date:

CS-7, 104, 1st Avenue Edenvale 1609
Designation:

Official stamp (Above)

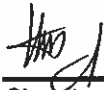


SECTION F: DECLARATION BY THE LAND OWNER

NB:(Only if the landowner is different from the Owner of the Facility)

I, Baruch Katz declare under oath that I -

- Am, aware of the waste management activity (ies) to take place or taking place in my property.
- Consented to this/ these activity (ies) taking / to take place in my property hereby indemnify, the government of the Republic, the competent authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible in terms of the National Environmental Management: Waste Act, 2008 (Act 59 of 2008).



Signature of Land Owner

BZK Trust

Name of company:

11 December 2025

Date:



Signature of the Commissioner of Oaths:


11.12.2025

Date:

ATTORNEY

Designation:

Official stamp (Above)

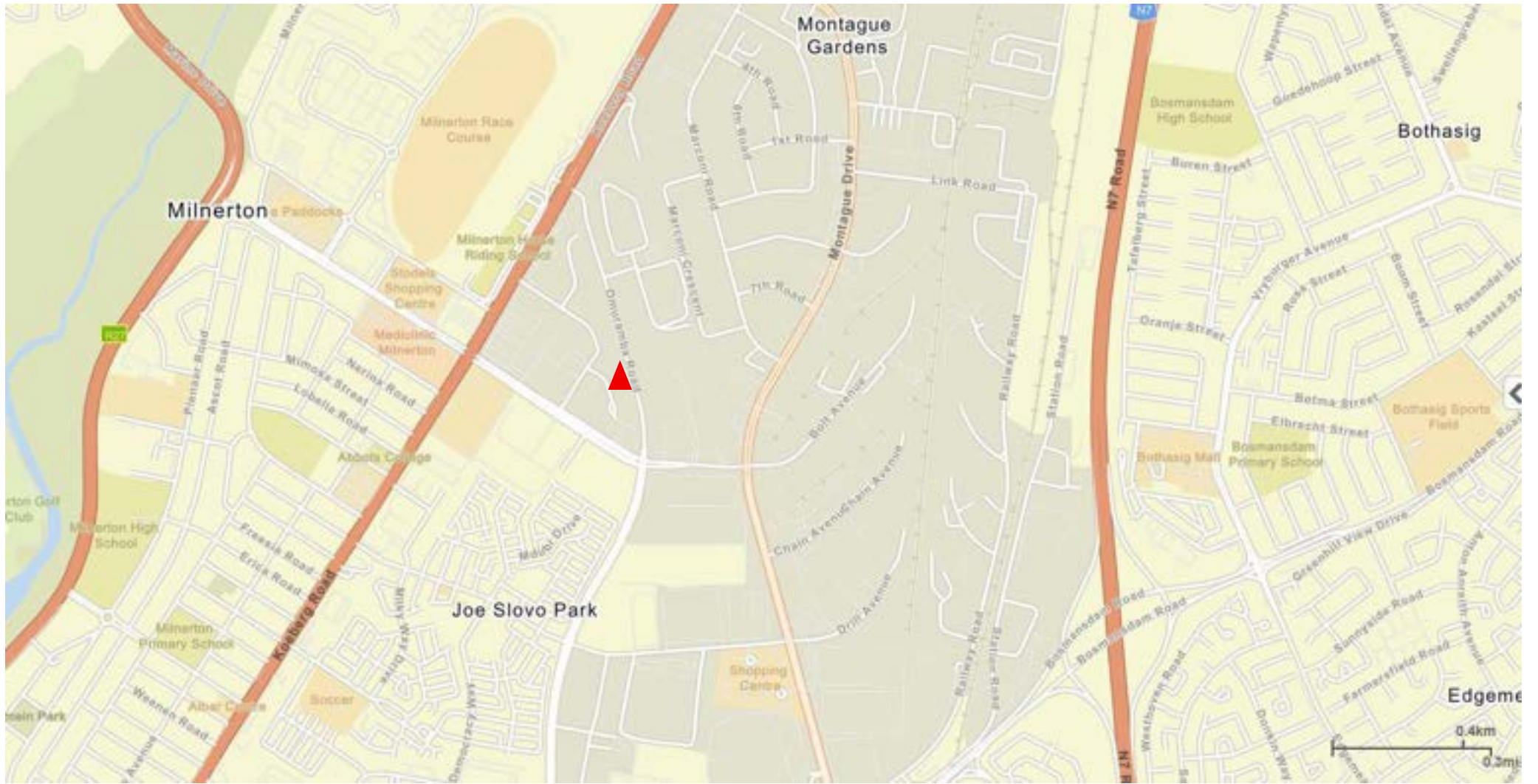


Gabriel Henri Lidchi
Ex Officio Commissioner of Oaths
Practising Attorney, South Africa
11 Alice Lane, Building 3, 2nd Floor,
Sandton, Johannesburg, 2196

Annexure A Site Location







Annexure B Property Zoning



Scale 1:500



+ 10 114 - 32 966 Degrees



Identify

Identify

Results

Clear

Spatial

Links

Property - Registered

Zoom

Report

Property Number	20674
Allotment Name	MLNERTON
ISIS Key	253005
Legal Status SG	Registered
Zoning Description	General Industrial 1
Vested Type	No Vesting
Addr No	2
Address No Suffix	
Street Name	WARBLER
Street Name Type	Close
Official Suburb Name	MARCONI BEAM
Subcouncil Name	Subcouncil 3
Ward Name	4
SG26 Code	C0160034000206740000000000
Status	Official
SHAPE.STArea()	3057.264535

Elevation_Height_Map_1m



Elevation_DTM_5m



Elevation_DTM_2m

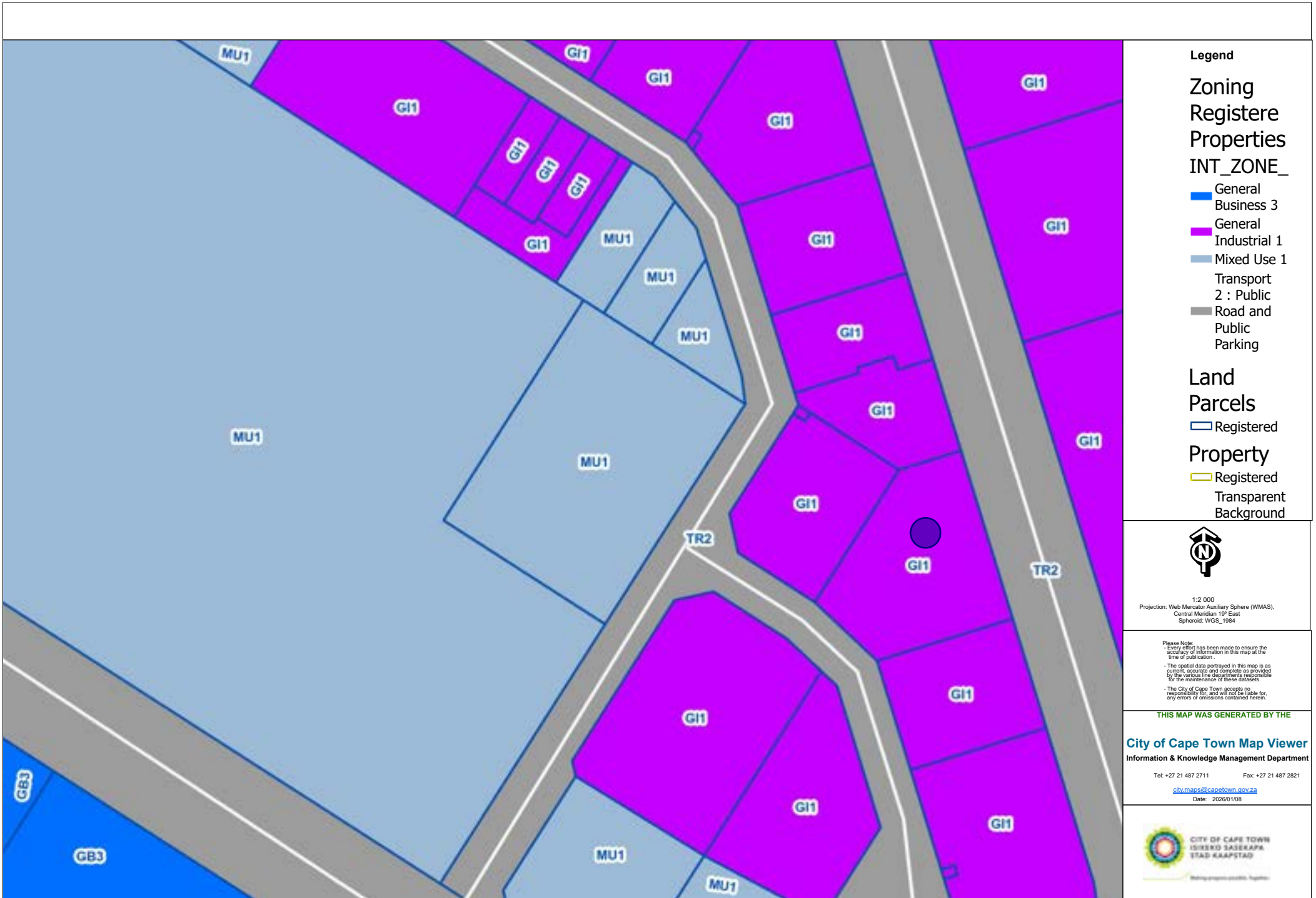


Elevation_CCT_GLM2019_5m_DEM



Elevation_DTM_10m







Annexure E: Copy of Exporter Permit



forestry, fisheries & the environment

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

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

Ref No: 49135182

Enquiries: Mr Mpho Morudu Tel: (+27) 12 399 9773 E-mail: MMorudu@dffe.gov.za

South Group Recycling (PTY) Ltd
Unit 5, 128 Boeing Road
East Bedfordview, Gauteng
2007,
South Africa

Phone: +27 78 631 1319

Email: jhb@south-group.co.za

Dear Mr. Donatas Brazaitis,

CONSENT FOR THE TRANSBOUNDARY MOVEMENT OF WASTE FROM SOUTH AFRICA TO JAPAN: NOTIFICATION No.: ZA088/2025

The Department of Forestry, Fisheries and the Environment (the Department) as the competent authority for the implementation of the Basel Convention on the Control of Transboundary Movement of Hazardous Waste and their Disposal in South Africa is satisfied that a consent from the concerned Competent Authority in respect of the abovementioned notification is duly received.

The notification concerns the transboundary movement of 1700 tonnes of Printed Circuit Boards from South Group Recycling (Pty) Ltd in South Africa to Mitsui Bussan Metals Co., Ltd in Japan for recycling by Mitsubishi Materials Corporation Naoshima Smelter & Refinery at their facility located at 4049-1, Naoshima-cho, Kagawa-gun, Kagawa, 761-3110, Japan. According to the notification document the movement of the waste is intended to occur in 150 shipments from 01 January 2026 to 31 December 2026 on a route that transit through Singapore.

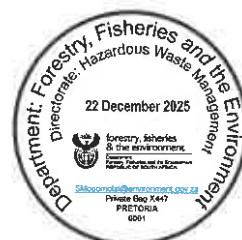
Having considered the documents submitted in this respect, the Department on behalf of the South African government hereby grants consent for the export of the said waste stream provided that the following conditions are met:

- Copy of this permission and movement document accompany each shipment of waste;
- Movement documents must be submitted to the Department on Basel@dffe.gov.za prior to the commencement of the movement operation with the subject title of the email being the notification number as specified above;
- Movement documents must be stamped by the recycler and submitted to this Department on completion of the transfer of each consignment; and
- Proof that the waste materials are successfully recycled must also be submitted to this Department once the recycling operation is completed.

This consent is valid from 01 January 2026 until 31 December 2026.

Yours faithfully

Ms. Sharon Mogomotsi
DIRECTOR: HAZARDOUS WASTE MANAGEMENT
BRANCH: CHEMICALS AND WASTE MANAGEMENT
DATE: 22/12/2025



PRECIOUS METALS ACT, 2005

(ACT 37 OF 2005)

Precious Metals Export Approval

Issued in terms of section 12

**APPROVAL IS HEREBY GRANTED FOR EXPORT IN TERMS OF SECTION 12 (1)
OF THE PRECIOUS METALS ACT NO 37 OF 2005**Issued to: **SOUTH GROUP RECYCLING (PTY) LTD**
Client Code: 22192

Identity/registration number: 2021/444660/07

Entitling the holder to:

Export unwrought or semi-fabricated Precious Metals in the form of electronic waste, spent catalytic converters and crushed spent catalytic converters as PGM-powder to Japan, Hong Kong, United Arab Emirates, South Korea, Lithuania and Germany OnlyVia the following port/s: **OR Tambo International Airport, Cape Town International Airport, King Shaka International Airport, Durban Harbour, JHB Container Depot and Cape Town Harbour Only.**

Conditions of Permit (if any):

That the holder bi- annually declare and submit to the Regulator a complete and accurate summary of its monthly exports, indicating –

- 1. The quantity of the unwrought and semi-fabricated precious metals exported in each month;**
- 2. The type of the unwrought and semi-fabricated precious metals exported in each month;**
- 3. The total value of the unwrought and semi-fabricated precious metals exported each month;**
- 4. The origin of the unwrought semi-fabricated precious metals exported.**
- 5. The permit is valid for one year from the date of issue, until 19 May 2026**

**CHIEF EXECUTIVE OFFICER
S.A. DIAMOND AND PRECIOUS METALS REGULATOR**DATE ISSUED: 20 MAY 2025
VALID UNTIL: 19 MAY 2026
SERIAL NO: 3435

SOUTH GROUP RECYCLING PTY LTD
UNIT 4 ON MASTIFF
LINBRO
JOHANNESBURG
2196

Applicant Reference 0000266651
Application No 253298
Permit Number EXP2026/51549
Date Of Issue 2026-01-12

EXPORT PERMIT REPORT

An export permit with the following details has been issued to you and submitted electronically to SARS, Customs and Excise.

HS Code 85492990
HS Description OTHER
Commodity PRINTED CIRCUIT BOARDS
To the following country(ies) JAPAN
To the following consignee MITSUI BUSSAN METALS CO
Using the following port(s) NO SPECIFIC PORT
To the amount not exceeding R 205 700 000
To the quantity not exceeding 1 700 000
This permit expires on 2026-07-12
Conditions

THIS EXPORT PERMIT IS SUBJECT TO THE PROVISIONS OF NOTICE NUMBER R92 PUBLISHED IN GOVERNMENT GAZETTE NUMBER 35007 ON 10 FEBRUARY 2012, AS AMENDED.

- 1) Only goods specified in the permit may be exported.
- 2) The permit may not in any manner be transferred by the holder thereof to any other person or may not be used to the benefit of anyone not referred to in the permit.
- 3) The permit shall be valid for a maximum of six months from the date of issue or for such shorter period as indicated on the permit.
- 4) Nothing contained in this notice shall absolve an exporter from the obligation of also complying with the provisions of other legislation related to the exportation of goods from the Republic of South Africa.
- 5) The export container number/s for the exportation of the goods authorised in this permit must be reflected on all relevant export documentation including the Customs Bill of Entry for Export.
- 6) Permit condition number 5 is ONLY applicable to the exportation of SCRAP METAL, SEMI-FINISHED METAL PRODUCTS and WASTE PAPER.

Yours faithfully



Director: Import and Export Control
International Trade Administration Commission of South Africa

The DTI Campus (Block E)
77 Meintjies Street
Sunnyside, Pretoria
0002

Private Bag X192
Pretoria
0001
South Africa

Tel: +27 12 394 3609
Fax: +27 12 394 0517
<http://www.itac.org.za>

Customer Contact Centre:
0861 843 384



Annexure F: National Screening Tool Report

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

EIA Reference number: Not Yet Available

Project name: South Group Recycling - Cape Town Waste Management License Application

Project title: Application for Waste Management License - Cape Town Operation

Date screening report generated: 13/10/2025 12:01:48

Applicant: South Group Recycling - Cape Town

Compiler: LexEco

Compiler signature:
.....

Application Category: Services|Waste Management Services|Storage Facilities|Hazardous



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Proposed Project Location

Orientation map 1: General location

General Orientation: South Group Recycling - Cape Town Waste Management License Application



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	MILNERTON	30195	0	33°51'57.74S	18°30'47.82E	Erven
2	MILNERTON	20674	0	33°51'59.5S	18°30'48.22E	Erven
3	MILNERTON	20673	0	33°51'58.8S	18°30'46.72E	Erven

Development footprint¹ vertices:
No development footprint(s) specified.

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

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	14/12/16/3/3/2/2498	Solar PV	Approved	27.9

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

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

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

Services | Waste Management Services | Storage Facilities | Hazardous.

Relevant development incentives, restrictions, exclusions or prohibitions

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

Incentive, restriction or prohibition	Implication
Strategic Transmission Corridor-Central corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Combined_EGI.pdf
South African Conservation Areas	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/SACAD_OR_2025_Q2_Metadata.pdf

Proposed Development Area Environmental Sensitivity

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

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

Specialist assessments identified

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

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

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

Results of the environmental sensitivity of the proposed area.

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

MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	07. Low-Moderate

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY



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

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

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

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

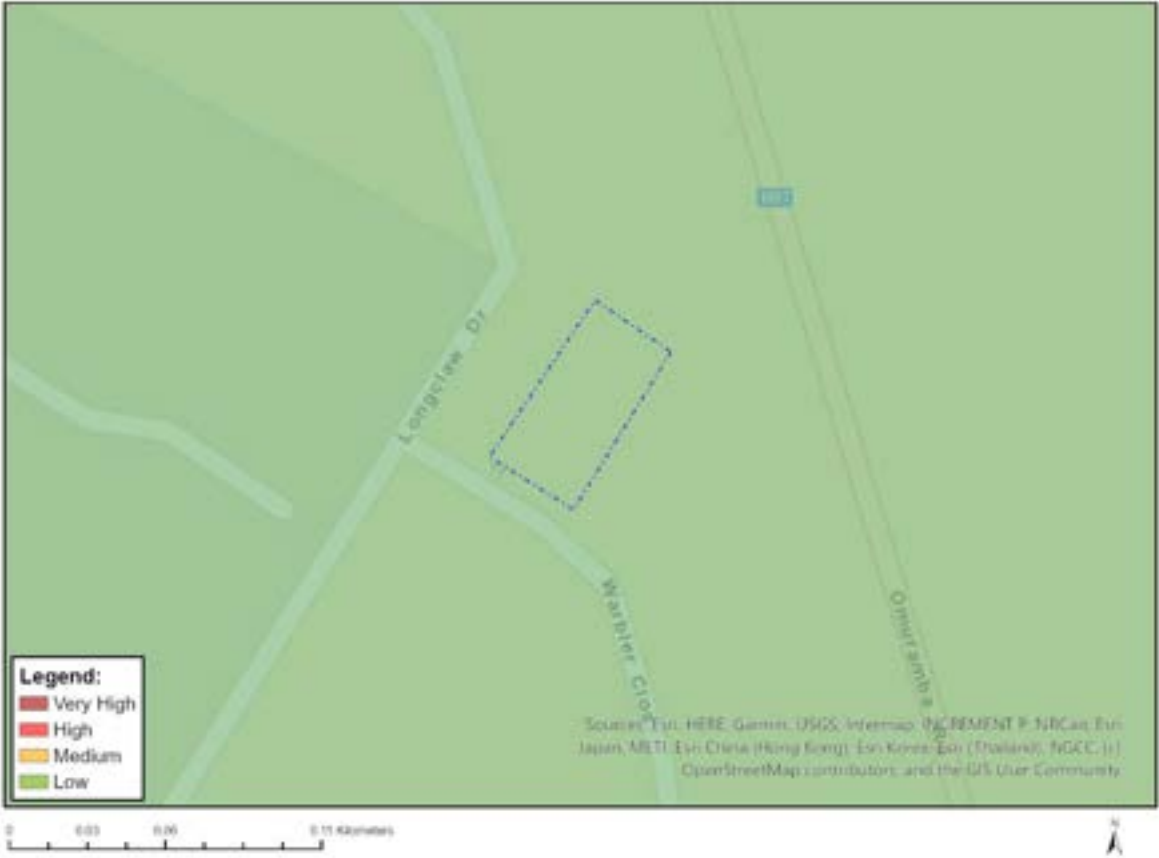


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

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

MAP OF RELATIVE DEFENCE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	Military and Defence Site

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

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

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



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

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	CR_Cape Flats Sand Fynbos



Annexure G: Site Verification Report



LEGAL INSIGHT. SUSTAINABLE IMPACT.

Site Verification Report

South Group Recycling (Pty) Ltd, Cape Town

Site Verification Report in Support of the WML Application for the Recycling, Recovery and Treatment of Hazardous Waste by South Group Recycling (Pty) Ltd, Cape Town

11 February 2026

Report Nr: SGR-0005-LEX-2026

Where law meets sustainability.
Legal insight. Sustainable impact.



Report Title	Site Verification Report in Support of the WML Application for the Recycling, Recovery and Treatment of Hazardous Waste by South Group Recycling (Pty) Ltd, Cape Town
Report Date	11 February 2026
EAP Details	<p>LexEco (Pty) Ltd</p> <p>11 Alice Lane Building 3, 5th Floor Sandton, Johannesburg 2146</p> <p>Contact Person: Ilke Degenaar Nel EAPASA Reg Nr: 2019/711</p> <p>Tel: 010 023 8543 Email: info@lexeco.co.za</p>
Applicant Details	<p>South Group Recycling, Cape Town</p> <p>Unit 2 Marconi Estate Warbler Cl, Montague Gardens Cape Town, 7442</p> <p>Contact Person: Wayne Clancy</p> <p>Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@south-group.co.za</p>
Application Reference No:	Not Yet Available

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+27(0)12 023 8543 | info@lexeco.co.za | lexeco.co.za

11 Alice Lane, Building 3, 5th Floor, Sandton, Johannesburg, 2196 | Registration Number 2020/642/160/07



1. INTRODUCTION AND PROJECT BACKGROUND

South Group Recycling (Pty) Ltd ("South Group") operates a small-scale waste storage and transfer facility located in Unit 2 of the Marconi Estate located at 2 Warbler Close, Montague Gardens, Cape Town which falls within the jurisdiction of the City of Cape Town Municipality.

Current operations specialise in the sourcing, transport and storage of both electronic waste (inclusive of PC boards, electronic boards, computers, phones, appliances and electronics) and spent catalytic converters. Once received the material is subject to manual sorting before being repackaged and exported for further processing and refining.

South Group, Cape Town now propose to install new equipment at the existing facility with the aim of recycling, recovering and treating electronic waste. All operations will therefore be housed within the existing warehouse. No new development will be required nor will the existing warehouse and or associated infrastructure need to be expanded or modified. The proposed waste processing activities will not require any freshwater intake and therefore not generate any effluent. All operations are to be located within the existing warehouse on concreted surfaces, under a roof.

1.1. Purpose of this Report

On the 20th March 2020, the Department of Forestry, Fisheries and the Environment (DFFE) published GN 320, setting out "*Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Section 25(5)(a) an (h) and 44 of the National Environmental Management Act, 1998, when applying for an Environmental Authorisation*". These regulations require that an applicant must conduct an environmental sensitivity assessment of the site by utilising the Departments national web based Environmental Screening Tool ("**Screening Tool**").

The National Web based Environmental Screening Tool is a geographically based web-enabled application which allows a proponent intending to submit an application for an Environmental Authorisation in terms of the Environmental Impact Assessment (EIA) Regulations 2014, as amended to screen their proposed site for any environmental sensitivity. The Screening Tool identifies related exclusions and/ or specific requirements including specialist studies applicable to the proposed site and/or development, based on the national sector classification and the environmental sensitivity of the site.

Prior to undertaking a specialist assessment, the current use of the land and the environmental sensitivity of the site under consideration identified by the Screening Tool, must be confirmed by undertaking a site sensitivity verification.

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A site sensitivity verification must be undertaken by an environmental assessment practitioner or a specialist. The aim of the site sensitivity verification is to confirm or dispute the current use of the proposed project site and associated environmental sensitivity as identified by the screening tool. In summary the site sensitivity report must;

- Verify land use and theme sensitivities as identified by the DFFE Screening Tool;
- Confirm or disconfirm the need for a particular specialist assessment(s) as indicated by the DFFE Screening Tool; and
- Provide a motivation as to why the proposed a particular theme(s) is not applicable to the proposed development.

1.2. Expertise of the EAP Conducting the Site Verification

Ilke Degenaar Nel is an experienced Environmental Consultant and Registered Environmental Assessment Practitioner with over 20 years' experience in environmental management. With an Honours degree in Environmental Management from the University of South Africa, Ilke is well equipped with a sound knowledge and understanding of the natural environment. Ilke has successfully led and completed several applications and projects, including Full Scoping EIA's and Basic Assessments under NEMA and NEMWA, Water Use License Applications, Integrated Water and Waste Management Plans (IWWMPs) development, and the implementation of Environmental Management Programmes. Ilke also has extensive experience in the leading of environmental audits, including Water Use Licenses, Air Emissions Licenses, Waste Management Licenses, Environmental Authorisations and Environmental Management Programmes. Her skill base also extends into the practical fields as she is equipped to do a range of technical and design drawings and layouts using GIS software and AutoCAD.

Ilke was registered as a Professional Scientist with the South African Council for Natural Scientific Professions in 2020 (SACNASP Reg Nr: 119935) and also holds a valid registration as an Environmental Assessment Practitioner (EAP) with the Environmental Assessment Practitioners of South Africa (2019/711).

2. SITE LOCATION AND DESKTOP ASSESSMENT

South Group Recycling currently operates a waste storage and transfer facility within Unit 2 of the Marconi Estate located at 2 Warbler Close, Montague Gardens, Cape Town which falls within the jurisdiction of the City of Cape Town Municipality. Operations are housed within a warehouse which forms part of an already developed industrial area which can be access via established roads, including Warbler Cl, Longclaw Drive. Regional roads such as the R27, N7, M8 and M5 also provide regional as well as national access to and from the area.

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According to the City of Cape Town's Zoning Scheme, the proposed site is zoned as "General Industrial 1" which supports the current land use activities. Areas to the North-east, East and South of the site comprises of many warehouses and large format stores and distribution centres.

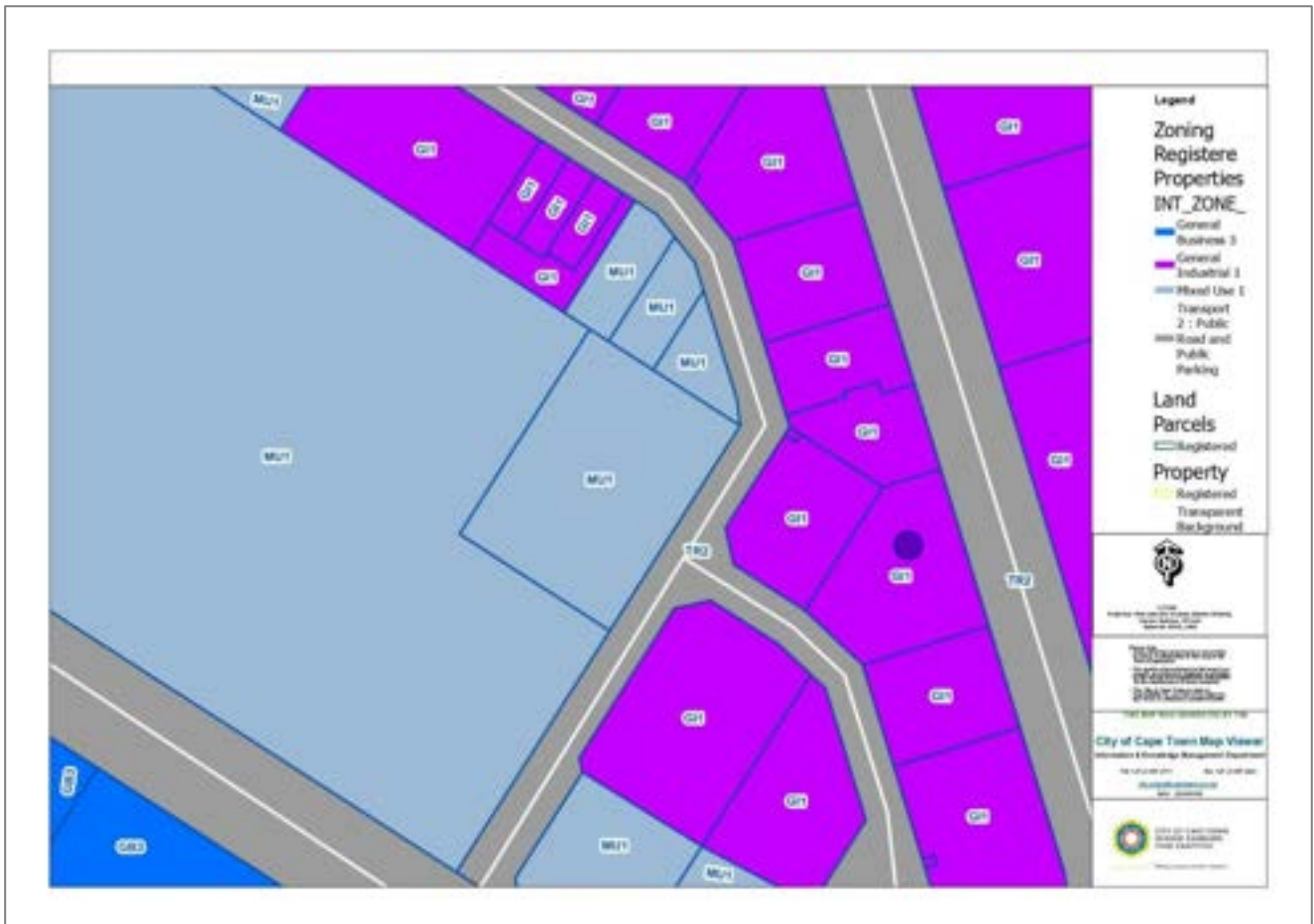


Figure 1: City of Cape Town Municipal Zoning Map

Industrialisation of the area now known as Montague Gardens started in and around the 1980's when the undeveloped land was transformed into a major logistics and commercial hub with excellent transport links via the N1 and N7 to the CapeTown CBD and local ports importing and exporting points of reference such as the Cape Town International Airport and coastal harbours.

Montague Gardens is now known as one of Cape Town's largest industrial nodes, playing a crucial role in the thriving West Coast economy and providing support to light industries which include manufacturing, and retail operations.

Refer to Figure 1 below for an aerial view of the local area and the South Group site.



Figure 2: Aerial View of the South Group, Cape Town facility

Based on the aerial view it has been concluded that the site and surrounding area has completely been transformed.



Photo 1: Street view entrance to the Marconi Industrial Estate



Photo 2: Street view of the South Group Recycling, Cape Town Facility

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Photo 3: Material receiving and sorting area



Photo 4: Product packaging and storage



Photo 5: General view of warehouse and operational areas



Photo 6: General view of warehouse and operational areas



Photo 7: Work stations



Photo 8: General view of warehouse and operational areas

3. SCREENING TOOL IDENTIFIED SENSITIVITIES

The DFFE National Screening Tool was used to identify environmental sensitivities associated with the proposed project site and to identify the need for specialist studies.

According to the DFFE National Screening Tool, the following environmental sensitivities were identified;

Table 1: National Screening Tool Site Sensitivities

Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agricultural Theme	x			
Animal Species Theme		x		
Aquatic Biodiversity Theme				x
Archaeological and Cultural Heritage Theme	x			
Civil Aviation Theme		x		
Defence Theme				x
Palaeontology Theme			x	
Plant Species Theme				x
Terrestrial Biodiversity Theme	x			

While the Screening Tool identified relevant sensitivities for certain themes, a site verification was undertaken to confirm actual site conditions and the nature of the proposed activities. The Screening Tool provides a conservative, desktop-based assessment, however professional judgement is required to determine the applicability of the identified sensitivities and current land use specific to the site.

3.1. Agricultural Theme Sensitivity

The Screening Tool identified the site as having a “High” sensitivity toward the Agricultural Theme.

The South Group, Cape Town operations are located within a pre-existing warehouse which forms part of an established industrial area. According to the City of Cape Town Spatial Planning Framework the site as well as surrounding area is also zoned as “General Industrial 1”. Land use in the area is characterised by large format warehouses for light industrial to logistical purposes. The existing land use for the site was therefore confirmed as industrial and not agricultural.

The site sensitivity verification disputes the Screening Tool’s “High” sensitivity rating for the Agricultural Theme and confirms the agricultural theme to be “Low”.

No agricultural assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.2. Animal Species Sensitivity

The Screening Tool identified the site as having a “Medium” sensitivity toward the Animal Species Theme.

According to the screening tool the following species were identified with having potential presence within the project site and surrounding area;

Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
Pachysoma Aesculapius / Westcoast Flightless Dung Beetles	Medium	<p><i>Pachysoma aesculapius</i> is a flightless, endangered dung, commonly found along the arid, sandy coastline of Southwestern Africa.</p> <p>The Westcoast Flightless Dung Beetle is known to be highly sensitive to habitat disturbance which has been the leading cause for lower numbers being recorded and its highly threatened status.</p> <p>Decades of industrialisation and land development in and around the Montague Gardens region has led to severe degradation of the natural environment, removal of vegetation disturbance of land. The potential for the Westcoast Flightless Dung Beetles to still thrive in the now hostile environment is considered to be very low.</p> <p>The National Screening Tools Sensitivity Rating towards the potential occurrence of the Westcoast Flightless Dung Beetles is</p>	Low

Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
		therefore disputed and the confirmed sensitivity rating confirmed to be low.	
Conocephalus peringueyi / Peringuey's Meadow Katydid	Medium	<p><i>Conocephalus peringueyi</i>, known as the Peringuey's Meadow Katydid, is a vulnerable invertebrate endemic to the Fynbos biome within which Cape Town falls.</p> <p>According to information available from the South African National Biodiversity Institute (SANBI), the Peringuey's Meadow Katydid has only been recorded in six known locations.</p> <p>Continued disturbance of natural habitat has led to a very small area within which the Peringuey's Meadow Katydid can thrive.</p> <p>The South Group operations and industrial site is not considered to be in line with the preferred habitat structure of the Peringuey's Meadow Katydid. The continued use of the industrial site will in fact avoid the need for potential relocation or development of virgin land which may pose a risk to the vulnerable species as well as fynbos biome.</p> <p>The National Screening Tools Sensitivity Raing towards the potential occurrence of the Peringuey's Meadow Katydid is therefore disputed and the confirmed sensitivity rating confirmed to be low.</p>	Low
<i>Bullacris obliqua</i> / Bladder Grasshopper	Medium	<p><i>Invertebrate-Bullacris obliqua</i> also known as the bladder grasshopper is an insect endemic to the west coast of South Africa which inhabits the fynbos biome.</p> <p>Little research or information is available on the bladder grasshopper (<i>Invertebrate-Bullacris obliqua</i>) other than that the fact that <i>Eriocephalus africanus</i> (wild rosemary) is the only confirmed hostplant for this species according to the South African National Biodiversity Institute (SANBI).</p> <p>The National Screening Tools Sensitivity Raing towards the potential occurrence of the bladder grasshopper is therefore disputed and the confirmed sensitivity rating confirmed to be low.</p>	Low

The site sensitivity verification disputes the Screening Tool's "Medium" sensitivity rating for the Animal Species Theme and confirms the animal species theme to be "Low".

No animal species assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.3. Aquatic Biodiversity Theme

The screening tool identified the proposed project site as having a “Low” sensitivity towards the Aquatic Biodiversity Theme.

The hydrology of the Montague Gardens area in Cape Town is defined by its low-lying position on the Cape Flats, which results in a high-water table and surface drainage via canals into the nearby Diep River.

The site is located within the existing industrial area which forms part of the Diep River Catchment area and the quaternary catchment G21F. Operations are housed within a warehouse on concreted surfaces, limiting potential contact with storm water and runoff. The site itself is considered to be flat with drainage leading to existing stormwater infrastructure.

The site sensitivity verification confirms the Screening Tool’s “Low” sensitivity rating for the aquatic biodiversity theme.

No aquatic biodiversity assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.4. Archaeological and Cultural Heritage Theme

The DFFE Screening Tool Report results shows that the site has a “Low” sensitivity in terms of heritage and cultural importance.

The South Group, Cape Town operations are located in the Montague Gardens area which according to the South African Heritage and Resource Information System (“SAHRIS”) does not include any registered heritage or archaeological sites within a 5 km radius. The closest registered heritage sites include two registered buildings, both falling outside of the buffer zone.



Figure 3: Aerial view of local heritage sites

Continued operation of the established industrial site will have no impact on local or regional heritage or cultural aspects.

The site sensitivity verification confirms the Screening Tool's "Low" sensitivity rating for the archaeological and cultural heritage theme.

No archaeological and cultural heritage assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.5. Civil Aviation Theme

The DFFE Screening Tool Report results shows that the site has a "High" sensitivity in terms of the Civil Aviation Theme.

The "High" rating assigned by the National Screening tool has been contributed to the fact that the proposed project site is located approximately 3.5 km North of the Ysterplaat Aerodrome and 12 km Southwest of the Morningstar Airfield. The Cape Town International Airport is also located approximately 12 km south-east of the project site.

The current waste storage and transfer operations undertaken by South Group, Cape Town are housed within an existing warehouse which forms part of an established industrial area. No additional development and or expansions to the established infrastructure will be required as the warehouse in its current state is considered ideal for the continuation of the waste storage and transfer operations as well as the proposed waste processing activities being applied for. The proposed project will not encroach into airspace and will pose no risk to ongoing aeronautical operations.

The site sensitivity verification disputes the Screening Tool's "*High*" sensitivity rating for the Civil Aviation Theme and confirms the Civil Aviation Theme to be "*Low*".

No assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.6. Relative Defence Theme

The DFFE Screening Tool Report results shows that the site has a "*Very High*" sensitivity towards the Relative Defence Theme.

The current waste storage and transfer operations undertaken by South Group, Cape Town are housed within an existing warehouse which forms part of an established industrial area. No additional development and or expansions to the established infrastructure will be required as the warehouse in its current state is considered ideal for the continuation of the waste storage and transfer operations as well as the proposed waste processing activities being applied for.

The site sensitivity verification disputes the Screening Tool's "*Very High*" sensitivity rating for the relative defence theme and confirms the relative defence theme to be "*Low*".

No assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.7. Palaeontology Theme

The DFFE Screening Tool Report results shows that the site has a "*Low*" sensitivity towards the Palaeontology Theme.

The South Group, Cape Town operations are located in the Montague Gardens which according to the South African Heritage and Resource Information System ("**SAHRIS**") does not include any registered palaeontological sites within a 5 km radius.

The south Group, Cape Town operations are located within an already developed industrial area. No additional development which would require clearance of vegetation or site disturbance will be required or be undertaken. It is therefore not expected that palaeontological resources will be impacted.

The site sensitivity verification confirms the Screening Tool's "Low" sensitivity rating for the palaeontology theme.

No assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.8. Plant Species Theme

The DFFE Screening Tool Report results shows that the site has a "Low" sensitivity towards the Plant Species Theme.

The Montague Gardens area falls within the Cape Flats sand Fynbos. The area has however been subject to urbanisation and industrialisation, limiting the presence of natural vegetation within the Montague Gardens area and established industrial site occupied by South Group Recycling.

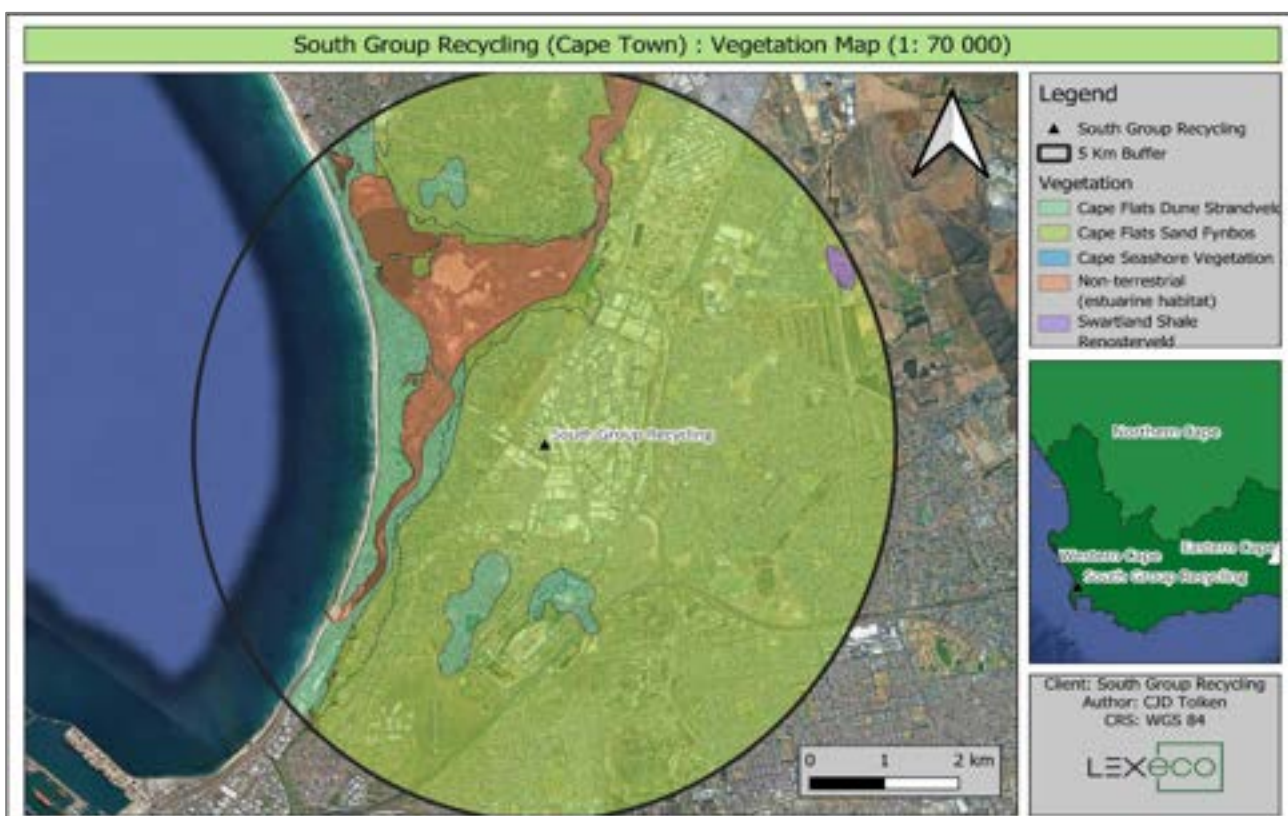


Figure 4: Area Vegetation Map

The site sensitivity verification confirms the Screening Tool's "Low" sensitivity rating for the plant species theme.

No assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.

3.9. Terrestrial Biodiversity Theme

The DFFE Screening Tool Report results shows that the site has a "Very High" sensitivity in terms of the Terrestrial Biodiversity Theme.

General biodiversity within and around Montague Gardens is considered to be heavily degraded due to extensive development and industrialisation. No natural vegetation remains, limiting the potential for overall biodiversity.

The South Group, Cape Town operations, are housed within a warehouse which forms part of an established industrial site. Surface areas are completely concreted and or paved. The surroundings to the site have also been completely transformed, leaving no natural vegetation which would be able to support a basic ecosystem. Habitat disturbance due to industrial activity and land development has led to a low level of biodiversity presence within the study area. By continuing with operations within the already established area and site, no new development will be required. The warehouse as well as associated infrastructure is considered ideal in housing the ongoing waste storage and transfer operations as well as the proposed waste recycling, recovery and or treatment activities, if approved. No additional development or expansion of the facility footprint will be required. The need for virgin land development will be avoided all together, assisting and supporting local conservation efforts in the area by limiting industrial operations to ideally zoned and already developed areas. Continued use and operation within the proposed footprint and site will therefore have no impact on the area's biodiversity.

The site sensitivity verification disputes the Screening Tool's "Very High" sensitivity rating for the Terrestrial Biodiversity theme and confirms the terrestrial biodiversity theme to be "Low".

No assessment or compliance statement is therefore required and will not be undertaken as part of the impact assessment in support of the application.



4. SITE VERIFICATION OUTCOMES AND CONCLUSION

The site verification and desktop assessment have concluded that all sensitivities in relation to the project site are low.

Localised operation of the proposed recycling, recovery and treatment activities within an existing warehouse and industrially zoned site will have limited impacts on the receiving environment, avoiding the need for land development.

No specialist assessments will be required or included in the Environmental Impact Assessment. It is however recommended that all aspects and impacts identified as part of the Impact Assessment be addressed and appropriate mitigation measures implemented and incorporated into the Environmental Management Plan which is to be drafted and submitted to the Competent Authority in respect of the application for a Waste Management License.



Annexure H: Site Photos



Photo 1: View of the entrance to the Marconi Estate from Webler Cl Road



Photo 2: External view of Unit 2 in the Marconi Estate, leased by SGR



Photo 3: Material receiving and sorting area



Photo 4: Product packaging and storage



Photo 5: General view of warehouse and operational areas



Photo 6: General view of warehouse and operational areas



Photo 7: Work stations



Photo 8: General view of warehouse and operational areas