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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, Durban

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, Durban
Report Date	11 February 2026
EAP Details	**LexEco (Pty) Ltd** 11 Alice Lane Building 3, 5th Floor Sandton, Johannesburg 2146 **Contact Person:** Ilke Degenaar Nel EAPASA Reg Nr: 2019/711 Tel: 010 023 8543 Email: info@lexeco.co.za
Applicant Details	**South Group Recycling, Durban** Unit 4 at 65 Marshall Dr, Mount Edgecombe, Durban, 0182 **Contact Person:** Wayne Clancy Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@south-group.co.za
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 65 Marshall Drive, Mount Edgecombe, Durban. 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**).

➢ 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 Durban facility.

South Group intend to utilise their existing waste storage and transfer facility located at 65 Marshall Dr, Mount Edgecombe, Durban. 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, Durban will trigger the following activities listed under Category B of GN 921:

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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 ("**DFFE**").

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.

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➢ 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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ANNEXURES

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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

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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- a) domestic waste; b) building and demolition waste; c) business waste d) inert waste; or

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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	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-

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TERM	DEFINITION	
	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.

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I. SCOPING REPORT CONTENT IN ACCORANCE 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 IN REPORT**
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
(2)(f)	Motivation for need and desirability for the proposed development	Section 6

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GN R982, APPENDIX 2 CONTENT OF THE SCOPING REPORT		REFERENCE IN REPORT
(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
(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

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GN R982, APPENDIX 2 CONTENT OF THE SCOPING REPORT		REFERENCE IN REPORT
(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:	Section 15
(2)(i)(i)	The correctness of the information provided in the report	
(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

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1. INTRODUCTION AND BACKGROUND

South Group Recycling (Pty) Ltd ("**South Group**") operates a small-scale waste storage and transfer facility located at 65 Marshall Drive, Mount Edgecombe, Durban. 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 Durban 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 utilise their existing waste storage and transfer facility located at 65 Marshall Drive, Mount Edgecombe, Durban to allow the processing of hazardous waste (e-waste and spent catalytic convertors).

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 stats 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*."

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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, Durban 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, Durban 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.

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- ***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 Durban 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, Durban 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 the EAP 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.

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2. KEY ROLE PLAYERS

2.1. Details of the Applicant

Details of the Applicant and Responsible Contact Person are provided in **Table 3**.

Table 3: Applicant Details

Project Applicant:	***South Group Recycling (Pty) Ltd, Durban***
Trading Name:	South Group Recycling (Pty) Ltd, Durban
Contact person:	Wayne Gareth Clancy
Physical address:	Unit 4, 65 Marshall Drive, Mount Edgecombe, Durban, 0182
Postal address:	Unit 4, 65 Marshall Drive, Mount Edgecombe, Durban, 0182
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 4 and a copy of their Curriculum Vitae is appended in **Appendix A** of this report.

Table 4: EAP Details

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

2.3. Environmental Assessment Practitioners' Experience

Ilke 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. National Screening Tool Results

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 5: National Screening Tool Site Sensitivities

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

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.

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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.

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Table 6: Motivation for Exclusion of Specialist Studies Identified by the National Screening

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Agricultural Impact Assessment	The South Group, Durban operations are located within a pre-existing warehouse which forms part an old sugar mill which is now the centre site to an established industrial area. 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. No agricultural activity or development remains present on site. As such, no direct or indirect impacts on the area's agricultural operations are anticipated. 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.	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 Mount Edgecombe areas' zoning based on the 2026 eThekwini Spatial Development Farmwork, which confirms the sites Industrial Zoning status. Also refer to **Annexure H** of this report for site photos showing the extent and status of ongoing industrial activities on site. A full copy of the site verification report is also attached to this report under **Annexure G**.

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Terrestrial Biodiversity Impact Assessment	The South Group, Durban operations are located within a pre-existing warehouse which is located in an established industrial area with no natural vegetation remaining. 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. 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.	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 Mount Edgecombe areas' zoning based on the 2026 eThekwini Spatial Development Farmwork, which confirms the sites Industrial Zoning status. Also refer to **Annexure H** of this report for site photos showing the extent and status of ongoing industrial activities on site. The potential presence of identified terrestrial species such as the Crowned Eagle, Rough-haired Golden Mole, Flat-necked shield back bush cricket and East Coast Katydid is considered to be low. Monocultural plantations have also resulted in limited variety in terms of plant species. Refer to **Annexure G** for a full copy of the site verification report.
Plant Species Assessment		
Animal Species Assessment		
Archaeological and Cultural Heritage Impact Assessment	The proposed waste management activities to be undertaken by South Group, Durban will not have any impact on the regions archaeological, palaeontological or cultural heritage resources. Operations will be housed within an existing warehouse, in an established and industrially zoned area. No extension or alteration to the building and or operational footprint will be required, avoiding land disturbance all together.	The South Group, Durban operations are located in the Mount Edgecombe area which according to the South African Heritage and Resource Information System ("SAHRIS") (https://sahris.org.za/nhsmap) does not include any registered 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.
Palaeontological Impact Assessment		

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Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Aquatic Biodiversity Impact Assessment	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. The proposed waste management activities to be undertaken by South Group Recycling, Durban will not have any impacts on the receiving environment in terms of aquatic biodiversity or naturally occurring water resources. No specialist assessment in terms of Aquatic Biodiversity will be undertaken.	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.
Hydrology Assessment	The proposed waste manages activities to be undertaken by South Group, Durban will be limited to the boundaries of an 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 associated site is 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.	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

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Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
	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. No impact to the areas hydrological status us therefore anticipated. No hydrological assessment will therefore be undertaken.	
Noise Impact Assessment	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. 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.	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.

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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	Mount Edgecombe is a key economic node in the eThekwini Municipality, functioning as a thriving industrial, commercial, and upmarket residential hub. Its strategic location and well-developed infrastructure contribute significantly to the regional economy. 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	No specialist assessments in terms of health and or socio-economic impacts will be undertaken.

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Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Socio-Economic Assessment	overall impact, even if positive will be low. Undertaking a full scope Socio-Economic Impact Assessment will therefore not be undertaken. 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.	
Ambient Air Quality Impact Assessment	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 form vehicle emissions associated with the transport of materials and product.	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.

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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 patters 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 4 65 Marshall Dr, Mount Edgecombe, Durban.

Physical Address:	**Unit 4 at 65 Marshall Dr, Mount Edgecombe, Durban, 0182**

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, Durban. The surrounding land use is also industrial in nature.

3.3. Surveyor General Code

N	0	F	U	0	2	1	7	0	0	0	0	3	1	9	6	0	0	0	4

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3.4. Site Location

The site is located within the suburb of Mount Edgecombe, located in the Northern regions of Durban, approximately 14 km northeast of Durban's CBD. Mount Edgecombe was historically characterised as a sugar cane growing region which has over the last decade been subject to more development. The area is characterised by a mix between residential, recreational and industrial spaces. The South Group, Durban operation is located within a small industrial centre which hosts a range of light industries like hardware and logistics, inclusive of Freedom Stationery and the regional distribution centre for Spar.

Refer to Table 6 below for the coordinates of the site.

Table 7: Site Coordinates

CORNER	LATITUDE	LONGITUDE
A	29°42'20.83"S	31° 2'6.29"E
B	29°42'21.37"S	31° 2'7.15"E
C	29°42'22.31"S	31° 2'6.47"E
D	29°42'21.75"S	31° 2'5.56"E

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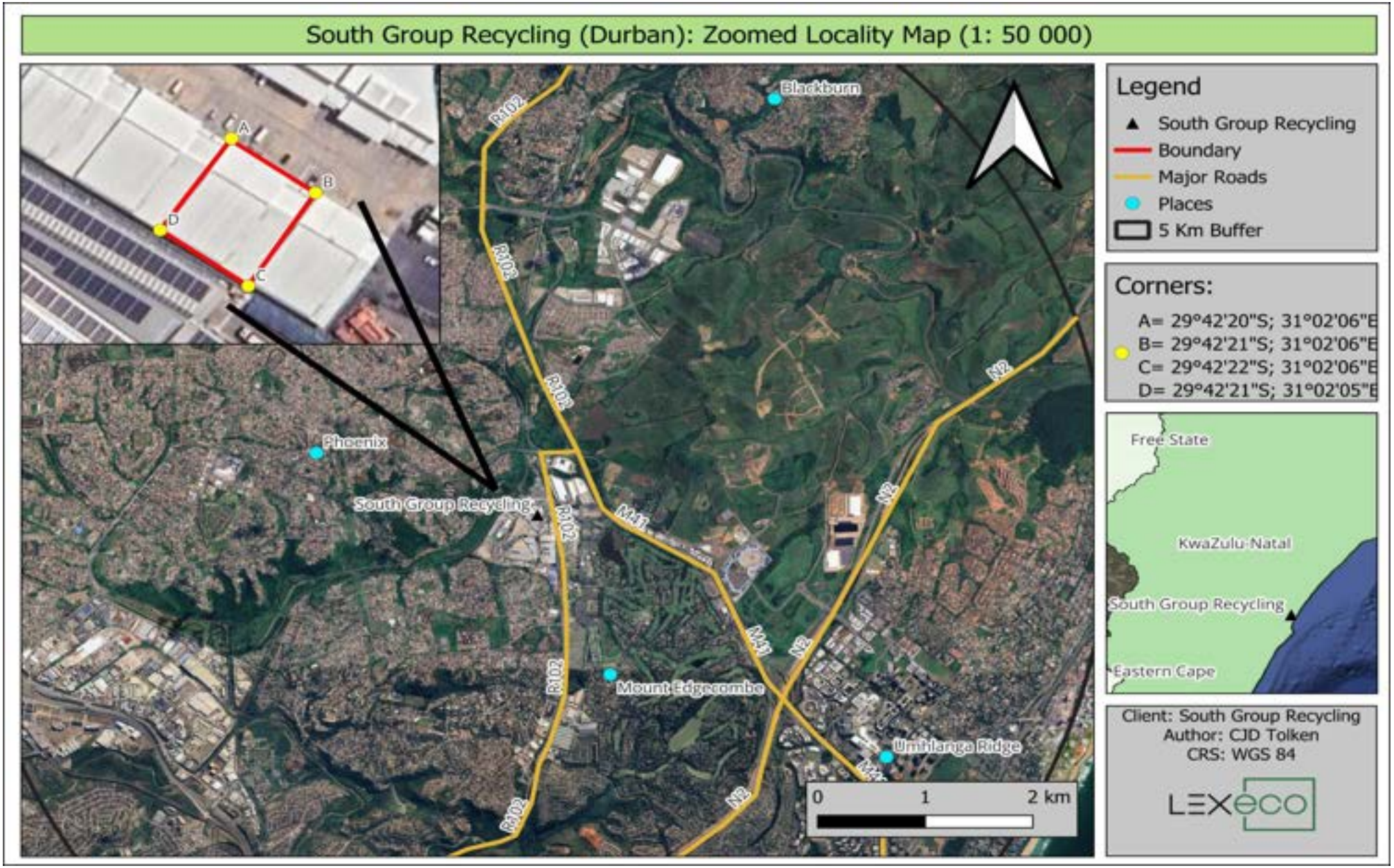

Figure 1: South Group Recycling, Durban Location)

Figure 2: Locality Map to be updated

4. PROCESS DESCRIPTION

4.1. Existing Operations

South Group Recycling (Pty) Ltd ("**South Group**") operates a small-scale waste storage and transfer facility located at 65 Marshall Dr, Mount Edgecombe, Durban. 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.

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 need to install equipment such as horizontal crushers, hammer mills, vacuum filters, cone mixers and scientific ovens to assist in optimal processing of approved waste streams. All operations will be housed within the existing South Group, Durban facility located at 65 Marshall Dr, Mount Edgecombe, Durban.

All waste streams will be collected from clients and transported to the South Group, Durban 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 will manually sort through each load, separating material according to grade.
- Once sorted, workers will 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 will be 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, Durban 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 form 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 Marshall Drive which links up Flanders Drive or Sucrose Crescent. The R102 runs past 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 packaged and stored in bulk bags in which

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material is received and again dispatched in. Workstations consisting of tables and chairs are also present which are used by employees for manual sorting and picking of e-waste.

Spent catalytic convertors 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*

All operations are located within a warehouse under a roof. 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 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 form 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 form the de-canning of spent catalytic convertors are 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.

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5. LEGISLATIVE CONTEXT

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

- **Section 24 – Environment**

"*Everyone has the right -*

1. *to an environment that is not harmful to their health or well-being; and*
2. *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.

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➢ **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 iterpretation 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 -

- **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.

- **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.

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- **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, Durban facility;

- Agricultural Theme – ***Very high***
- Animal Species Theme – ***High***
- Aquatic Biodiversity Theme – ***Low***
- Archaeological and Cultural Heritage Theme – ***Very high***
- Civil Aviation Theme – ***High***
- Defence Theme – *Very* ***Low***
- Palaeontology Theme – ***Medium***
- 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 **Annexure G** for a copy of the Site Verification Report.

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, Durban will apply for registration on the South African Waste Information System ("SAWIS") 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 stats 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 Durban will trigger the following activities listed under Category B of GN 921:

Table 8: 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, Durban 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 100m^3 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 80m^3 of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or temporary storage of such waste*."

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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 1 000 m^2 and more."*

An application for the registration of the South Group Recycling, Durban 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)

South Group Recycling owns and operates four individual facilities across South Africa, with the Durban facility being one (1). The Durban operations currently sources, stores, sorts and exports electronic 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 electronic waste as well as ceramic powder recovered from 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 electronic waste. The aim of this draft policy is to ensure the efficient, equitable, inclusive and financially sustainable management of the electronic waste to ensure that it is safe for the environment, protects human health and further circular economy principles.

The South Group Recycling, Durban 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

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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, Durban 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.

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- 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, Durban proposed wate 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 of the site or immediate surroundings.

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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 (f) discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit.
- 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.

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, Durban 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.

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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 m^2 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 has a very high sensitivity in terms of heritage and cultural importance. The South Group, Durban operations are currently housed within an existing warehouse which will continue to be used for the proposed waste management activities as applied for. The warehouse was assessed and found to be sufficiently located and structurally sound with enough space to house the planned operations. 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 within close vicinity to the property. Should this application be approved, the undertaking of the proposed wate management activities will not have any impact on localised heritage resources. The existing sensitivity towards Archaeological and Cultural Heritage resources is considered to be low.

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

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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 8 km southeast of the Virginia Airport and 11 km Northeast of the King Shaka International Airport.

South African Civil Authorisation Authority (SACAA) will be included on the Project stakeholder database.

5.10. eThekwini 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 eThekwini IDP supports the city's 2030 mission to;

- Accelerate spatial transformation and human settlements delivery.
- Address poverty, inequality, and unemployment.
- Strengthen participatory governance and rebuild institutional trust.
- Promote sustainable infrastructure, circular economy models, and resilience against climate change.
- Ensure that development is both fiscally sustainable and socially just.

The continued operations of South Group, Durban operations have provided positive contribution and support in terms of the eThekwini Municipality's SPD's mission and outcomes by means of providing sustainable employment, skills development and waste reduction efforts. Should the application for recycling, recovery and treatment of electronic waste be approved, the operations will be able to sustainably increase their contribution, assisting the overall municipal directive to achieve the provided goals. Waste reduction reduces the potential for waste disposal, improving the surrounding community's quality of life. The proposed project location is ideally located within a suitably zoned area with easy access to the public who provide both materials and labour. In conclusion, the proposed project is in line with the outcomes of the eThekwini SDP.

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.

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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 electronic 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 electronic 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 electronic waste, valuable materials such as copper, gold, and aluminium can be recovered and reused. Moreover, electronic 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 electronic 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 9: 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, Durban facility is located within a warehouse which forms part of an existing industrial site in an already developed area. Although the warehouse and industrial area falls within the footprint of a Critically Biodiversity Area (CBA) the site and area have completely been transformed and is considered to be disturbed with no natural vegetation remaining. Since the South Group operations are located within a developed site, the continued use thereof is considered a favourable alternative rather than relocating to a new location which may require development and
1.1.	How were the following ecological integrity considerations taken into account?	
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	

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QUESTION		ANSWER
1.1.3.	Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs")	construction of a suitable warehouse and infrastructure to support the operations. Storm water controls are already in place, further supporting the recommendation to continue with operations within the established site. No additional developments, extensions or alterations to the existing warehouse will be required, other than the installation of the needed equipment for the recycling, recovery and treatment of electronic waste. The warehouse is ideally located in a suitably zoned area which aligns with the eThekwini municipality's SDP. The area and site can easily be accessed via existing regional and national roads such as the R102 and M41. The eThekwini SDF is focused on providing a city that is city that is safe, clean, inclusive, affordable, and full of opportunities. In order to deliver, the city has developed an eight-point institutional strategy focused on: 1. Natural and Built Environment – Climate adaptation, waste management, sustainable infrastructure. 2. Economic Development – Investment promotion, SMMEs, informal economy, job creation. 3. Quality Living Environments – Housing, sanitation, energy security, spatial equity. 4. Social Equity and Inclusion –Access to health, education, youth and gender empowerment. 5. Organisational Excellence – Human capital, performance systems, digital transformation. 6. Vibrant, Creative City – Arts, heritage, creative economy, public space activation. 7. Good Governance – Participation, ethics, M&E, anti-corruption. 8. Financial Sustainability – Cost recovery, prudent borrowing, revenue enhancement. The approval and undertaking of proposed recycling, recovery and treatment of electronic waste and spent catalytic convertors by South Group will support the city's objective for economic growth by providing job opportunities, skill development and provision of raw materials and products used by other industries to
1.1.4.	Conservation targets	
1.1.5.	Ecological drivers of the ecosystem	
1.1.6.	Environmental Management Framework	
1.1.7.	Spatial Development Framework	
1.1.8.	Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.)	

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QUESTION		ANSWER
		produce high demand products and materials. The proposed operation will also assist in waste reduction, creation of sustainable employment and support to the local community by means of revenue generated from high value exports to the international market. 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.
1.2.	How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? 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? What measures were explored to enhance positive impacts?	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 which is summarised under Section 8 of this report. A preliminary impact assessment was undertaken and mitigation measures included under Section 10 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.
1.3.	How will this development pollute and/or degrade the biophysical environment? 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?	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. These sections will be further expanded on in the EIA phase and included when drafting the Environmental Management Programme (EMPr).

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QUESTION		ANSWER
1.4.	What waste will be generated by this development? 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?	Due to the nature of the application and proposed project, it is anticipated that general waste, inclusive of used bulk bags, plastic, packaging wate, 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. 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 and under a roof. Should small hydrocarbon spills or leaks occur due to the use and presence of machinery and equipment, the 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. All waste removed form site for recycling, recovery and or disposal will be facilitated by licensed service providers, dually authorised for the designated service. Relevant mitigation measures will be assessed in more detail in the EIR phase and included in the EMP.
1.5.	How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? 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?	The South Group, Durban 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. Since no development is planned the potential for paleontological or archaeological impacts therefore avoided. Approval of the proposed waste management activities will allow South Gorup, Durban to continue with operation whilst providing employment opportunities to the local community whilst also supporting skills

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QUESTION		ANSWER
		development and raw materials to local and international markets for the production of high demand products at a reasonable cost. An increased availability in precious metals recovered from electronic waste will reduce the need for mined minerals which directly impacts cultural heritage in South Africa.
1.6.	How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? 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?	Authorisation of proposed waste management activities will allow better management and monitoring of operations, limiting possible impacts on humans as well as the environment. The operations propose to optimally utilise available space for the planned waste management activities by installing new equipment, inclusive of crushers, screens, hammer mills, scientific ovens and vacuum filters for the recycling, recovery and treatment of electronic waste in addition to the ongoing waste storage and transfer activities. By utilising an existing industrial space, the need for virgin land development is avoided. Existing infrastructure is considered ideal in supporting the proposed operation as the property is already zoned for industrial use. 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 of 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. Implementation of good environmental management measures and activity focused mitigation will limit potential impacts on the community and general human health. After implementation, it is anticipated that the South Group, Durban operations will have a limited negative impact if managed appropriately. Refer to Section 10 of this report for a summary of identified impacts and proposed mitigation measures. 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.

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QUESTION		*ANSWER*
1.7.	How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? 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? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?	The South Group, Durban operations are located in an established industrial area within an existing warehouse, equipped to house ongoing as well as planned waste management activities. 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, South Group will be able to install new equipment which in turn will 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, Durban 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 inputs and needs, reducing and minimising the use of natural resources. The processing of electronic waste and spent catalytic convertors 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 and materials will lead to a reduced need for mined minerals and or manufactured materials which in turn will have a positive impact on the environment. Recycling of e-waste and spent catalytic convertors 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.
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)? (**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*).	
1.7.2.	Does the proposed use of natural resources constitute the best use thereof? 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?)	
1.7.3.	Do the proposed location, type and scale of development promote a reduced dependency on resources?	
1.8.	How was a risk-averse and cautious approach be applied in terms of ecological impacts?	By undertaking the scoping process, a preliminary assessment was undertaken with the aim of identifying

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QUESTION		ANSWER
1.8.1.	What are the limits of current knowledge (*note: the gaps, uncertainties and assumptions must be clearly stated*)?	potential impacts associated with the proposed scope of the project. The assessment was grounded on information provided by the applicant and information available to the EAP by means of research, industry standards and experience. 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. Based on the preliminary assessment undertaken as part of the scoping phase, overall risk of impact is anticipated to be low.
1.8.2.	What is the level of risk associated with the limits of current knowledge?	
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?	
1.9.	How will the ecological impacts result from this development impact on people's environmental right in terms following.	South Group, Durban 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. The proposed recycling, recovery and treatment activities support the objectives of the National Waste Hierarchy by avoiding the need for waste disposal. Electronic 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. On a social and economic level, already employed personnel will be provided with employment security,

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QUESTION		ANSWER
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. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimize, manage and remedy negative impacts?	new employment opportunities may be generated, skills development will be supported. The proposed recycling, recovery and treatment operations will also allow South Gorup, Durban 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.
1.9.2.	Positive impacts: e.g., improved access to resources, improved amenity, improved air, or water quality, etc. What measures were taken to enhance positive impacts?	
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.)?	Limited direct ecological impacts associated with the proposed project are anticipated as the proposed project will be located within an existing warehouse, located in an established industrial area. No new development will be required, avoiding possible impacts on social and or heritage aspects. Approval of the proposed project will allow the South Group, Durban to continue with operation at a more competitive level, providing employment security to already employed personnel. New employment opportunities may also be generated as efficiency increases which positively impacts the surrounding community. The proposed recycling, recovery and treatment operations will also allow South Gorup, Durban 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.
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?	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, Durban for existing waste storage and transfer activities. A complete assessment of impacts associated with the proposed project will be undertaken in the EIA phase and mitigation set out in the EMP.

QUESTION		*ANSWER*
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?	Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report. Based on the outcomes of the assessments and discussions the best suited option with the lowest impact was chosen for the proposed application.
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?	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 EMPr.
PROMOTING JUSTIFIABLE ECONOMIC AND SOCIAL DEVELOPMENT		
2.1.	What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?	The South Group, Durban facility is located within a warehouse which forms part of an existing industrial site in an already developed area. The warehouse as well as surrounding areas are completely developed, with no natural vegetation remaining. South Group now propose to install new equipment which will be used to process (recycle, recover and treat) electronic waste. The proposed undertaking will be housed within the existing warehouse already utilised by South Group Recycling, limiting the need for an additional development or expansion. The warehouse is ideally located in a suitably zoned area which aligns with the eThekwini municipality's SDP. The area and site can easily be accessed via existing regional and national roads such as the R102 and M41. No virgin land will need to be developed, nor will any natural vegetation be removed, avoiding any ecological disturbance. The eThekwini SDF is focused on providing a city that is city that is safe, clean, inclusive, affordable, and full of opportunities. In order to deliver, the city has developed an eight-point institutional strategy focused on: 1. Natural and Built Environment – Climate adaptation, waste management, sustainable infrastructure.
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,	
2.1.2.	Spatial priorities and desired spatial patterns (e.g., need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.),	
2.1.3.	Spatial characteristics (e.g., existing land uses, planned land uses, cultural landscapes, etc.), and	
2.1.4.	Municipal Economic Development Strategy ("LED Strategy").	

QUESTION		ANSWER
		2. Economic Development – Investment promotion, SMMEs, informal economy, job creation. 3. Quality Living Environments – Housing, sanitation, energy security, spatial equity. 4. Social Equity and Inclusion –Access to health, education, youth and gender empowerment. 5. Organisational Excellence – Human capital, performance systems, digital transformation. 6. Vibrant, Creative City – Arts, heritage, creative economy, public space activation. 7. Good Governance – Participation, ethics, M&E, anti-corruption. 8. Financial Sustainability – Cost recovery, prudent borrowing, revenue enhancement. The approval and undertaking of proposed recycling, recovery and treatment of electronic waste and spent catalytic convertors by South Group will support the city's objective for economic growth by providing job opportunities, skill development and provision of raw materials and products used by other industries to produce high demand products and materials. The proposed operation will also assist in waste reduction, creation of sustainable employment and support to the local community by means of revenue generated from high value exports to the international market. 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.
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, Durban 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	The local community will benefit directly form the proposed project on a social and economic scale

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QUESTION		ANSWER
	social needs and interests of the relevant communities?	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 area. Operations will therefore not encroach into local communities or impact the visual aesthetic of the surrounding areas. 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. 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.
2.4.	Will the development result in equitable (intra- and inter-generational) impact distribution, in the short and long-term? Will the impact be socially and economically sustainable in the short- and long-term?	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.
2.5.	In terms of location, describe how the placement of the proposed development will -	Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report. A preliminary screening assessment was 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. 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.
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,	

QUESTION		ANSWER
2.5.6.	for urban related development, make use of underutilised land available with the urban edge,	
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?	The expected potentially significant impacts have been preliminarily identified as part of this Scoping Process, the impacts on socio-economic aspects will be explored in more detail and quantified wherever possible during the EIA Phase.
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?	

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QUESTION		ANSWER
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?	
2.7.	How will the socio-economic impacts result from this development and impact on people's environmental right in terms following:	A preliminary screening assessment was 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.
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.	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.)?	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. South Group, Durban propose to install new equipment inclusive of crushers, screens, hammer mills, scientific ovens and vacuum filters which in turn will be used to recycle, recover and treat e-waste. 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. 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, Durban operations will have a limited negative impact if managed appropriately. Refer to Section 10 of this report for a summary of identified impacts and proposed mitigation measures. 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.

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QUESTION		ANSWER
2.9.	What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?	Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report. A preliminary screening assessment was also undertaken and potential impacts, inclusive of social, economic, heritage, cultural and environmental aspects identified. 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. A full assessment of the impacts will be undertaken and included in the EIA phase.
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)? 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?	As part of the screening process, several aspects were assessed in association with different alternatives which included technology, location, layout and design. Based on the outcome it was determined that the existing facility, already operated by South Group, Durban is 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. 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 creatin, employment security and skills development. Refer to the impact assessment and mitigation measures in Section 10. These aspects will be further explored in the EIA and EMPr.
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?	By conducting a Scoping and EIA process, the Applicant ensures that equitable access to environmental resources was 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 EMPr.

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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:	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. Refer to Section 13 of this report for a summary of the proposed public participation process to be undertaken
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 EMPr.

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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?	South Group will implement a Safety, Health, Environmental and Quality Policy on site which will regulate all activities on site. All workers and contractors will need to abide to the policies and framework as specified. A training and awareness programme must also be developed and implemented to ensure ongoing training and awareness of employees.
2.16.	Describe how the development will impact on job creation in terms of, amongst other aspects:	South Group, Durban 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. If this application is approved, South Group Durban 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. The proposed recycling, recovery and treatment operations will also allow South Gorup, Durban 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.
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:	South Group, Durban 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. 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.
2.17.1.	that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and	

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QUESTION		ANSWER
2.17.2.	that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?	A copy of the Draft Scoping Report will be subject to a comprehensive public 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. Refer to Section 13 of this report for a summary of the public participation process.
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?	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 form interested and or affected parties will be encouraged and all responses recorded and included in the Final Scoping Report which will be submitted to the competent authority for consideration. Refer to Section 13 of this report for a summary of the proposed public participation process to be undertaken
2.19.	Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	Mitigation measures prescribed were based on the outcome of impacts identified and are realistic and easily implementable. 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.
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?	South Group, Durban is in the business of wate minimization which supports the objectives of the National Waste Hierarchy by preventing unnecessary disposal of high-risk wase (such as electronic waste). 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. 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.

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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.

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7. REASONABLE AND FEASABLE 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, Durban.

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 as is. 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 wate 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-wate 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 wate 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 10: Site Selection Matrix

Environmental Consideration	Site Evaluation	
Within a 3 000m radius of the end of an airport landing strip.		✗
Within an unstable area (fault zone, seismic zone, dolomite, sinkholes).		✗
Within 500m of water resource.		✗
Nodality with respect to raw materials.		✗
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	

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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, Durban 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 electronic 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. Form 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 form 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 Durban 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.

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7.6. Conclusion to the Alternatives Considered

South Group propose to install new equipment which will allow the facility to process electronic waste. South group currently operates a waste storage and transfer facility located within an existing warehouse, located in an 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 or 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, Durban 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

Durban is characterised as having a humid, subtropical climate. Summer, ranging between October to April are hot and humid with generous rainfall. During the winter months (May to September), rainfall decreases along with lower temperatures but no frost. Summer temperatures can range from 21°C to 32°C whilst winter months tend to be more moderate with temperatures ranging between 12°C to 24°C.

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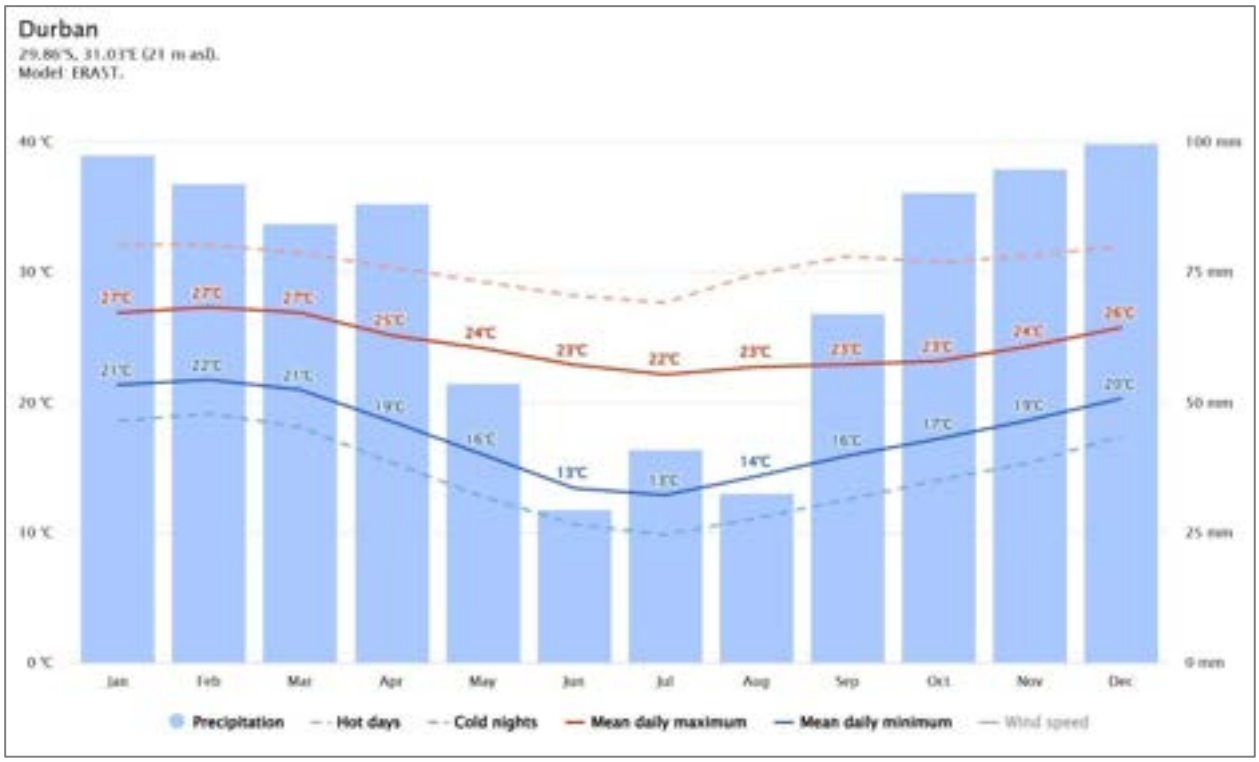

Figure 4: Mean temperatures and precipitation, Durban (Meteoblue, 2024)

8.1.1. Mean Monthly Wind Direction and Speed

Durban's climate is considered to be mild with seasonal variations in wind speeds and direction, making daily forecasts easy. Between March to December the region is prone to winds which originate form the South to Southwest. During the summer months (December to March), the wind direction shifts changing from the South to the East or Northeast.

Average wind speeds vary throughout the year with ranges between 1.5 m/s to 12 m/s, depending on the season and altitude.

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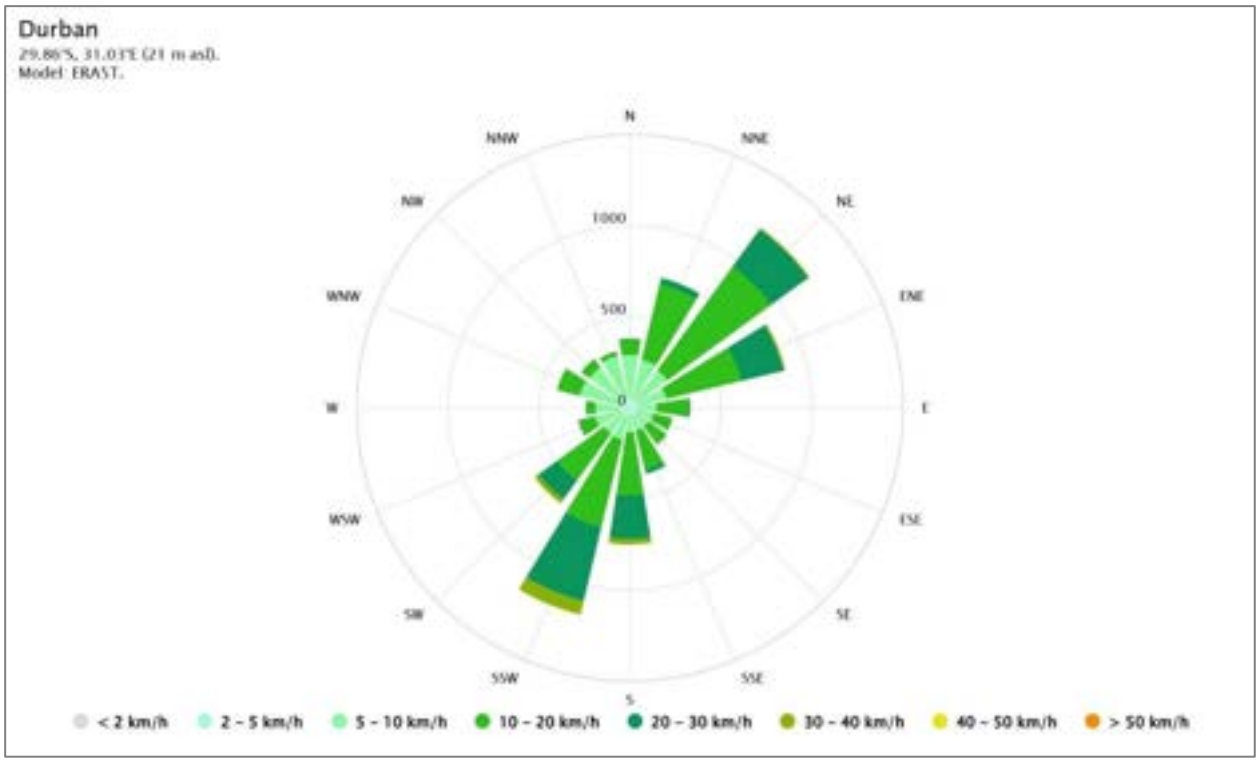

Figure 5: Durban Annual Wind Rose

8.2. Hydrology

The South Group, Durban operations is located in Mount Edgecombe, which is a hilly, undulating area located approximately 4 km inland from the coastal resort of uMhlanga Rocks. The general topography of the region is a narrow coastal plain that rises fairly steeply from the coast, eventually giving way to major river valleys originating from the interior escarpment.

The area has over years been subject to development which in turn has altered the landscape to some extent. The industrial site and warehouse currently utilised by South Group for their waste storage and transfer operations as well as the proposed recycling, recovery and treatment activities is relatively flat. All operations are located under a roof structure which avoids contact between waste materials and rainwater.

The site is located within the Umngeni River catchment and the quaternary catchment U20M which drains into the Umngeni River before flowing into the Indian ocean.

8.3. Topography

Mount Edgecombe, Durban is located in a generally hilly region at a height of approximately 1 08 meter above sea level. The industrial site currently utilised by South Group, Durban for ongoing operations is flat with concreted surfaces and warehouse structures.

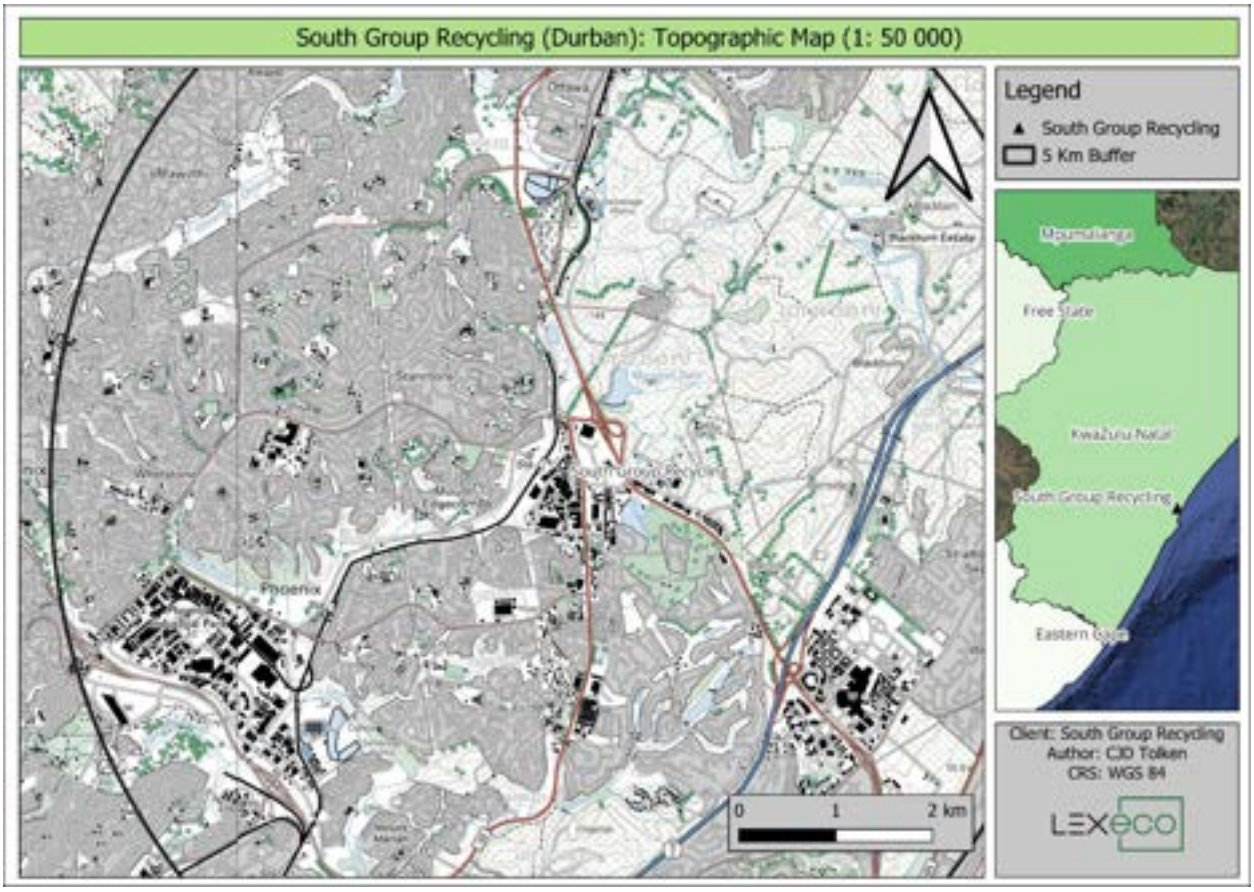

Figure 6: South Group Recycling, Durban Topographic Map

8.4. Geology and Soils

The area referred to as Mount Edgecombe in Durban, sits on deep, weathered sedimentary deposits (Berea Formation sands) over older granitic basement, featuring varied soils like compressible clays, silts, and sands, often deep and reddish, influenced by high rainfall, leading to ferralitic soils (kaolinite-rich) with low fertility but good drainage, and swelling/shrinking clays in others, all within a complex drainage system.

The area is characterized by Quaternary age coastal aeolian sands (Berea Formation), which create its rolling hills.

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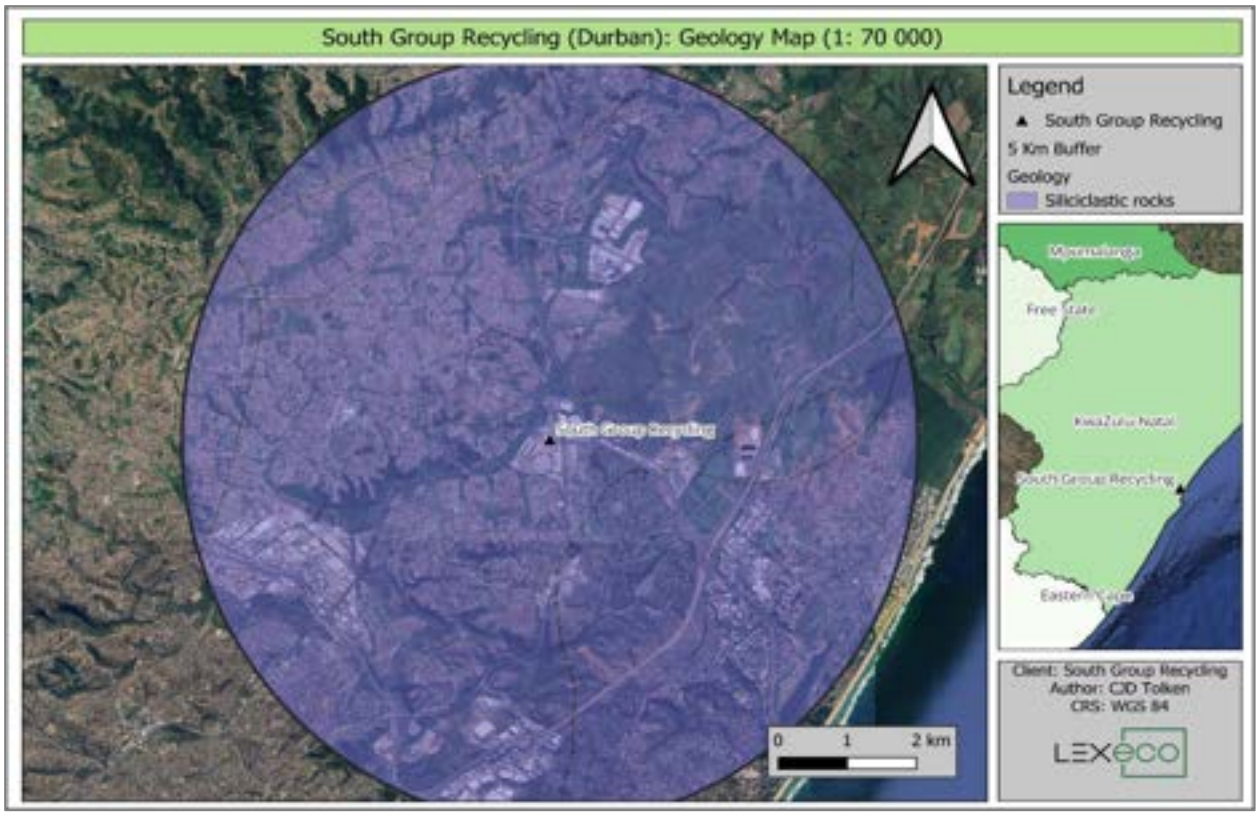

Figure 7: Area Geology and Soil Composition

8.5. Vegetation

Vegetation in the Mount Edgecombe area of Durban is characterized as lush, subtropical, and diverse, falling within the larger Indian Ocean Coastal Belt Biome.

The area, previously dominated by sugarcane plantations has over the yeas been transformed and is now dominated by a mixture of residential and recreational land uses with a small area zoned and used for industrial activity (within which South Group, Durban also operates). The area falls well within the KwaZulu-Natal Coastal Belt Grassland which has been classified as critically endangered. Vegetation types found within the biome include short grasses, low shrubs, and unique endemic plants, often found on plateaus and slopes. Habitat loss, urban development, agricultural development and encroachment of alien invasive species have led to severe habitat loss and is now considered critically endangered.

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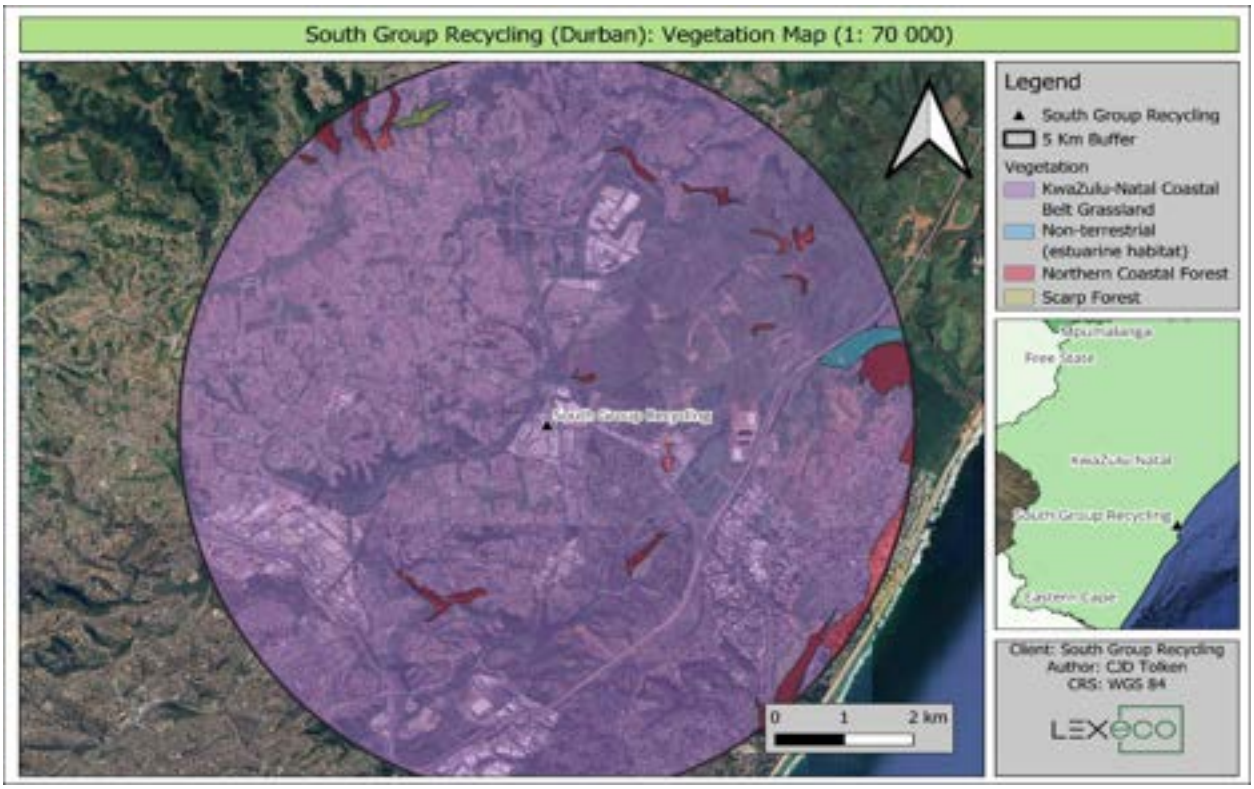

Figure 8: Area Vegetation

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

Photo 1: External of office entrance

Photo 2: Warehouse area view

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8.6. Socio-Economic Context

The site is situated in the jurisdiction of the eThekwini Municipality which covers approximately 2 555km km^2, making it the third largest municipal district in South Africa. According to the 2022 census, the eThekwini Municipality is home to approximately 4 239 901 people, with an average household size of 3,8 In terms of gender, eThekwini is considered balanced as the current population is split between 48.9% males and 51.1% females. On average approximately 12.9% of the population has a grade 12 or higher qualification whilst approximately 4.4% of the population has no schooling. The average reported income for a median household in eThekwini was reported to be R 7 900.00 per month.

Mount Edgecombe is a key economic node in the eThekwini Municipality, functioning as a thriving industrial, commercial, and upmarket residential hub. Its strategic location and well-developed infrastructure contribute significantly to the regional economy.

Table 11: Demographic Information for the eThekwini district

Durban – eThekwini	**2022 Census**
Population	4 239 901
Households	1 122 738
Average Household Size	3,8
Population Age	
0-14	21,0%
15-64	72,2%
65+	6,8%
Sex	
Male	48.9%
Female	51.1%
Education	
No Schooling	4,4%
Grade 12 and Higher Education	12,9%
Household Profile	
Number of Households	1 122 738
Average Household Size	3,8
Household Services	
Flushing Toilet	80,4%
Access to piped water in the dwelling	69,8%
Electricity for lighting	98,5%

8.7. Site Verifications

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

- Agricultural Theme – ***Very high***

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

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.

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

8.7.1. Agriculture and Land Use

The National Screening Tool yielded a "Very High" Sensitivity toward the Agricultural Theme due to the site and surrounding areas history and land use linked to sugar cane plantations and the operations undertaken by the South African Sugar Association Experiment Station which was used for research on sugar cane breeding, pest control and farming techniques. The area, previously dominated by agricultural activity and sugar cane plantations has since been subject to urbanisation and the development of the now mixed residential, recreational and industrial area known today.

South Group Recycling currently operate their waste storage and transfer operations from within a now industrial park. The property and associated infrastructure, originally known as the Old Mill Industrial Park evolved from a historic sugar cane mill established in the 1850's. The mill continued with operation up until around 1994, after which the property and infrastructure was modified for modern industrialisation. South Group now lease a warehouse which forms part of the historic development. Surrounding properties have also been fully developed and now house a range of warehouses and light industrial operations. Moving further away, the area has largely been urbanised and is now home to a popular upscale residential area with golf estates and country clubs. The potential for the area to be converted back to agricultural land use

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is considered to be low. According to the eThekwini Municipal Zoning Tool, the property from which South Group currently operates is zoned for industrial use, further lowering the possibility for rezoning applications for land conversion to support Agricultural activities.

In conclusion, the National Screening Tools "Very High" sensitivity is considered inaccurate and was in fact confirmed to be "Low".

Figure 9: Areial View of the South Group, Durban Facility

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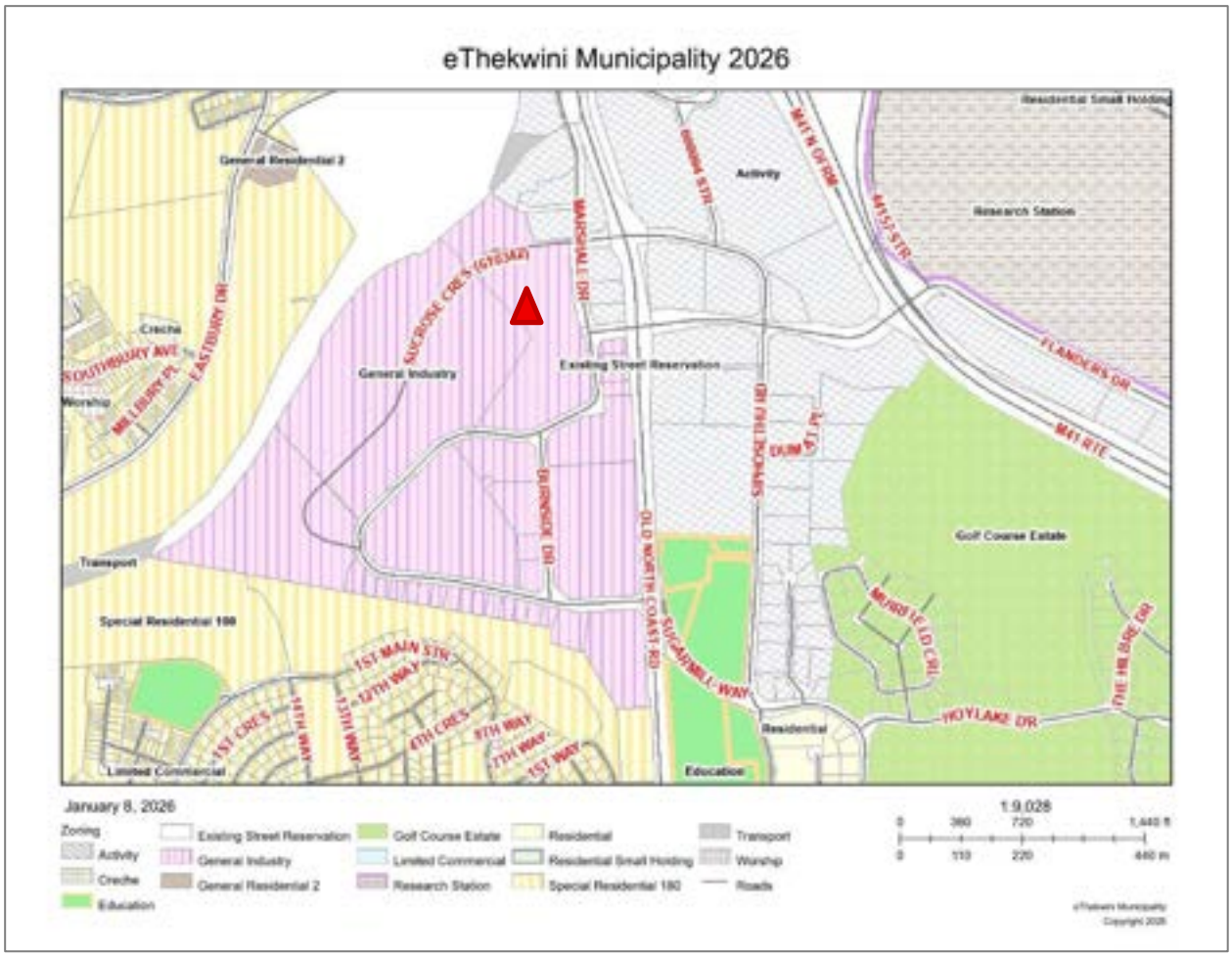

Figure 10: Area Zoning based on the eThekwini SDP 2026

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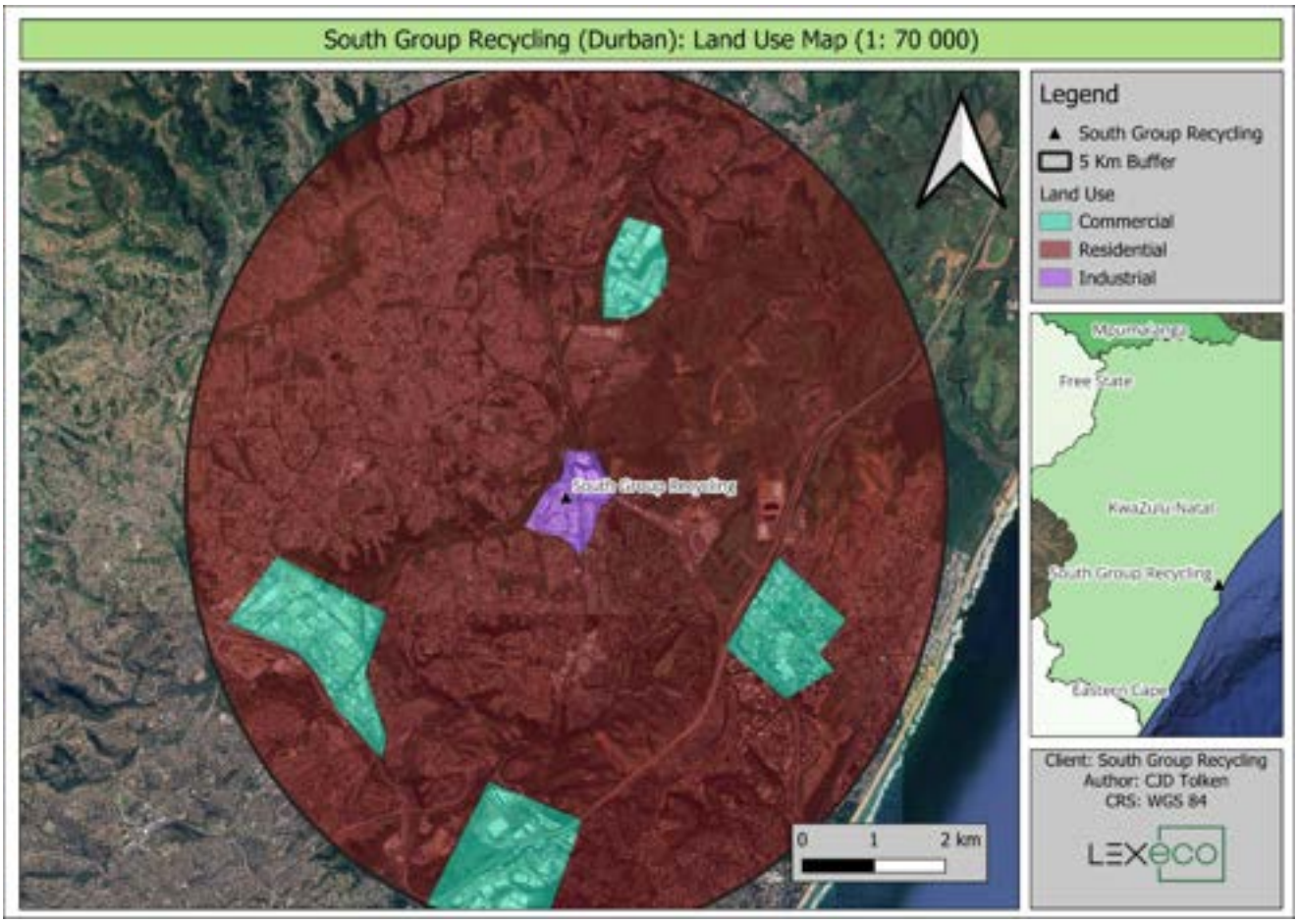

Figure 11: Mount Edgecombe area land use map

8.7.2. Terrestrial Biodiversity

Geneal biodiversity within and around the Mount Edgecombe, Durban areas is considered to be heavily degraded due to extensive agricultural activities, recent urbanisation and industrialisation. In the 1900's the area was widely used for the cultivation of sugar cane. With the turn of the century, the land use in the areas shifted more towards residential and or recreational use with the establishment of a golf estate and country club. Little natural vegetation remains, limiting the potential for overall biodiversity.

The South Group, Durban operations as mentioned above, 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 disturbance and land development has led to a low level of biodiversity presence within the study area. The KwaZulu Natal Coastal Beld Grassland Biome is also considered critically endangered and must be protected. By continuing with operations within

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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 areas biodiversity.

8.7.3. Surface Water and Wetlands

Due to the overall climate associated with South-Africa's eastern coastline and topography, the Mount Edgecombe area is rich in different water features including wetlands, dams and streams. No natural water resources are, however, located within the direct vicinity of the project site. The nearest water resources to the site include the Marshall dam, located within the bounds of the Blacburn Estate, approximately 800 m to the North-east of the project area and a dam forming part of the Mount Edgecombe estate and golf course approximately 650m to the South-east of the project site. The Ottawa River, flowing from west to east, separates Phoenix from the Old Mill Industrial Park, within which the South Group, Durban facility is located. To the south the Piesang river also flowing from west to east is located to the south of the industrial site.

All waste management activities are to be housed within an existing warehouse. No storm water or rain will come into contact with material stored and managed on site. The warehouse and industrial complex is 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 the existing municipal supply and infrastructure.

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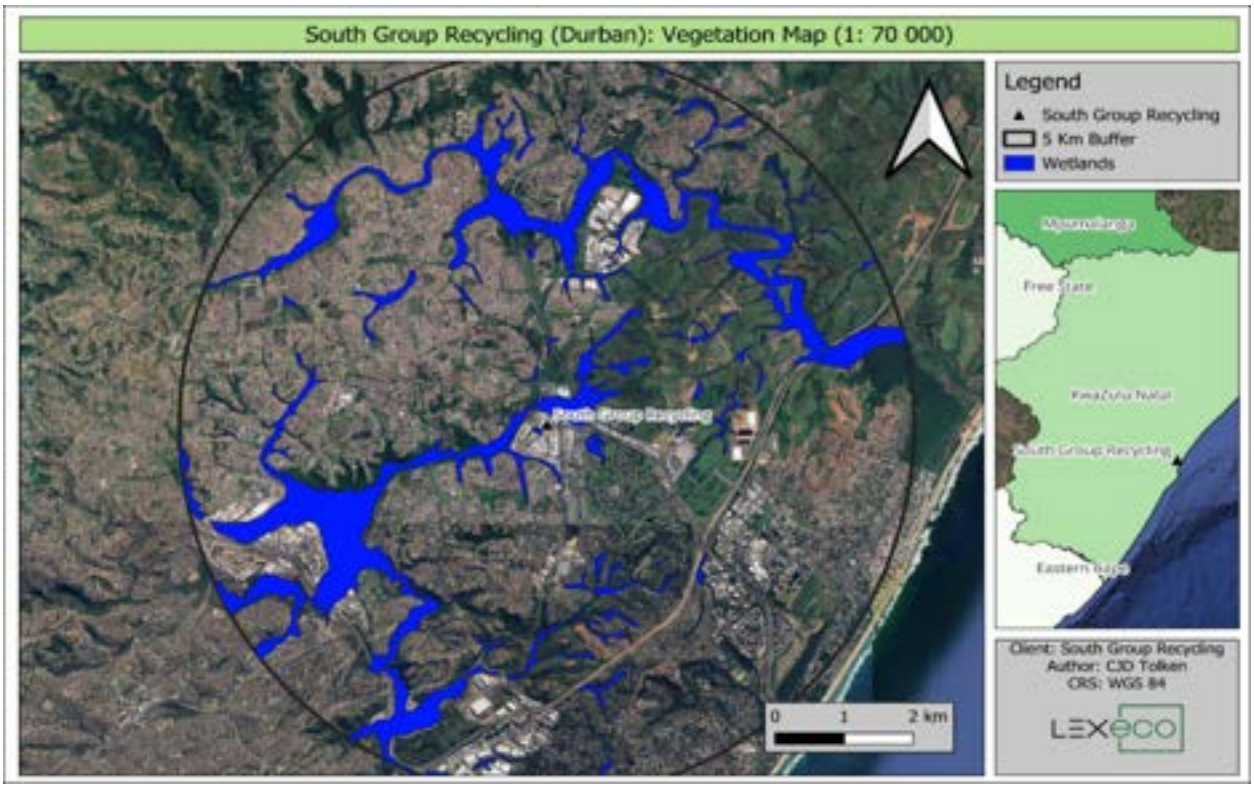

Figure 12: Area Hydrology, South Group, Durban

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 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 is due to the proposed project site being located approximately 8 km southeast of the Virginia Airport and 11 km Northeast of the King Shaka International Airport.

The current waste storage and transfer operations undertaken by South Group, Durban 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 any airspace and will pose no risk to ongoing aeronautical operations. The South African Civil Authorisation Authority

(SACAA) will however be included on the Stakeholder Database and therefore informed of the application and proposed project.

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, Durban storage and transfer operations will continue in conjunction with the proposed processing of electronic waste if approved. A slight increase in traffic is anticipated as a higher frequency of loads may frequent the site for the offloading of approved waste materials for processing and the collection and transport of product for export. The increase is not anticipated to have a major impact on local traffic flow in the area as the existing infrastructure and roads are considered sufficient in supporting any additional loads.

8.7.8. Air Quality

Air quality around Mount Edgecombe is considered to be fair with an air quality index ranging between 33 -42. This means the air quality is acceptable for most individuals, though sensitive groups may experience minor symptoms such as eye, throat and nose irritation during dry and windy conditions.

According to the Kwazulu-Natal provincial Air Quality Management Plan (dated 2025), by mass, the largest pollutant emitted within the province was Carbon Monoxide (CO) and PM10. Mining operations are considered to be the largest contributor to Particulate Matter (PM) emissions whilst vehicles contribute to approximately 58% of Nitrogen Oxide (NOx) emissions. Biomass burning was identified as the main contributor to CO emissions. Listed activities regulated under the National Environmental Management: Air Quality Act, 39 of 2004 ("NEMAQA") are accounted for the highest SO_2 emission contributions in the province.

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

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

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filters which will act as abatement prior to the release of possible PM emissions during operation. The only other impact anticipated would be form 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 Durban 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 Durban 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 impact 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 and probability of the identified impact.

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

Table 12: Risk Classification

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

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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;

Significance Rating (SR) = (Duration + Probability + Extent) x Severity

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

Probability: *Likeliness (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 13: 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 14: 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**

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Table 15: 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 16: 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 14 below.

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Figure 13: Mitigation Hierarchy

Calculation of the Residual Risk Rating is calculated as follows;

Residual Risk Rating (RRR) = (Duration + Probability + Extent) x Severity – (Mitigation + 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 17: 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%**

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Table 18: 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 18 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.

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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

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Table 19: 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	• 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	• 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	• 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 mist be covered in such a way as to limit the loss of material during transit	Low

Environmental Aspect	Potential Impacts	Anticipated SR	Proposed Mitigation Measures	Anticipated RRR
	Degradation of road networks and infrastructure	Moderate		Low
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	• 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	• 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		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	Supported recovery of precious metals from a waste material	Positive Impact	No mitigation required. Positive Impact	Positive Impact

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Environmental Aspect	Potential Impacts	Anticipated SR	Proposed Mitigation Measures	Anticipated RRR
Valuable Materials	Generation of recyclable materials such as plastic, glass and precious metals used by alternative industries for the manufacturing of quality goods and products			

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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 the overall ambient air quality in the area.
- Nuisance noise due to operational equipment and the 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 EMPr 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 eThekwini 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 19 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 20: IAP Register (Restricted)

Department / Representative	Contact Person	Tel	Email	Postal / Physical Adress	Registered
State Departments and Relevant Authorities					
Department of Forestry Fisheries and the Environment *(Competent Authority)*	Chief Directorate				✓
Department of Forestry Fisheries and the Environment	Hazardous Waste Management				
Department of Economic Development, Tourism and Environmental Affairs	Chief Director: Environmental Management				
eThekwini Municipality Ward Councillor)	Rory Macpherson				

Department / Representative	Contact Person	Tel	Email	Postal / Physical Adress	Registered
eThekwini Municipality Spatial Planning and Land Use Management Department	-				
eThekwini Municipality Cleansing and Solid Waste Department	-				
Precious Metal Regulator	Mmathabo Mngadi				
South African Civil Aviation Association Authority	Aviation Environmental Compliance				
Landowners and Local Stakeholders					
Number Eleven Trust *(Landowner)*	J K Magjee A Ackerman				✓
Global Roofing Solutions	Andrew Savides				

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Department / Representative	Contact Person	Tel	Email	Postal / Physical Adress	Registered
Laser Junction	-				
Startex	-				
Filtec Automation (Pty) Ltd	Roelf van Rooyen				
Water Purification Chemicals & Plant CC	-				
Jungheinrich South Africa (Pty) Ltd	-				
Wood trends	-				
KIRK marketing Pty Ltd	-				
Farm-AG International	Cameron Miller Dr. Arthur Keegan				
Forever Living Products	Rani				
QR PRECISION ENGINEERING	-				
Spunchem International	-				
Rugs Original Head office	-				

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 Mercury Newspaper, 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. 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, Durban, Administrative Office
  Unit 4, 65 Marshall Dr, Mount Edgecombe, Durban, 4300
- **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**.

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14. EIA PROCESS

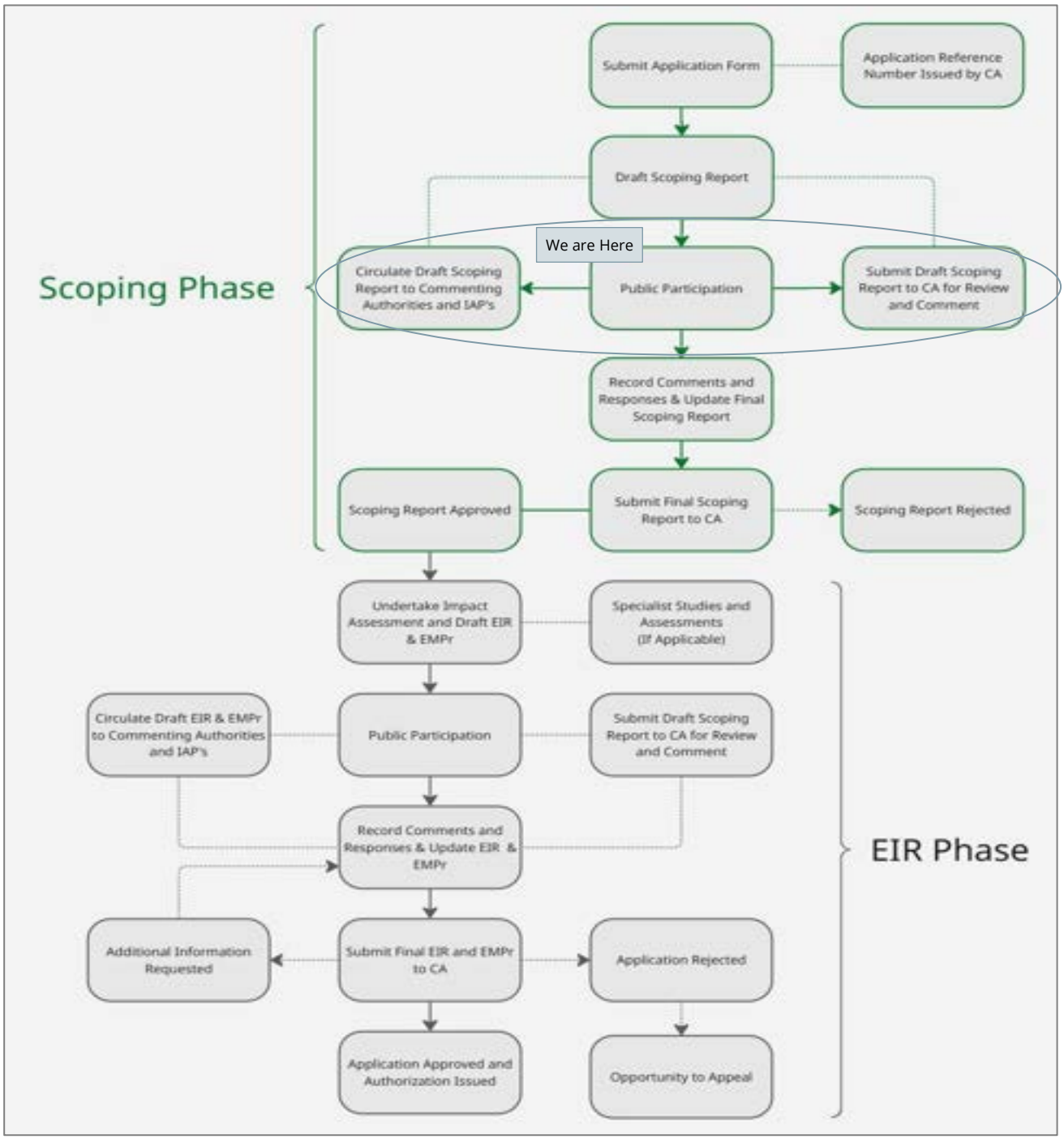

Figure 14: Full Scoping EIA Process Flow

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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
EAPASA Registration Number 2019/711

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16. CONCLUSION AND RECOMMENDATIONS

South Group Recycling (Pty) Ltd operates an existing waste storage and transfer facility in Mount Edgecombe, Durban, 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.

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Annexure A: EAP Qualifications and CV

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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

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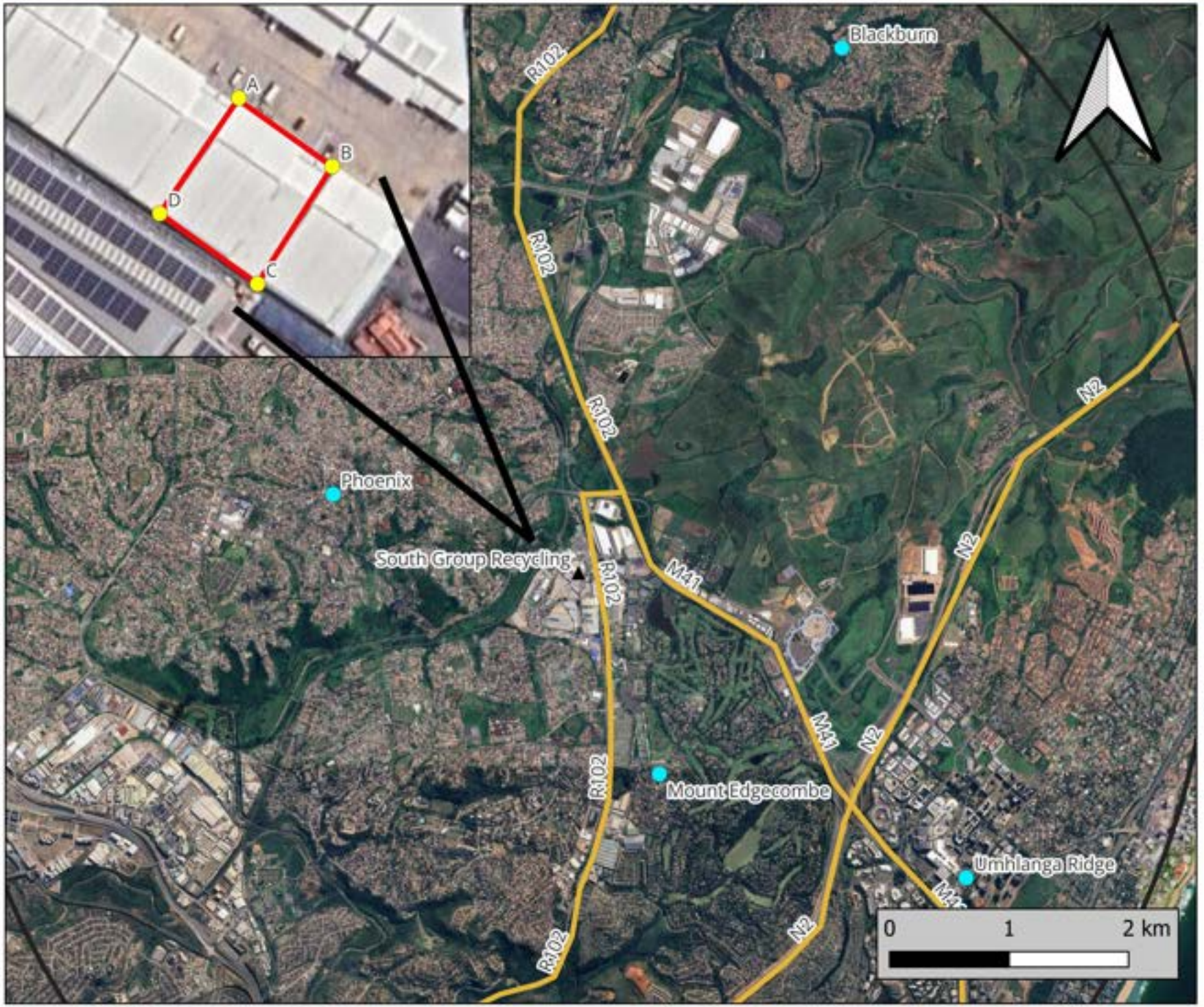
South Group Recycling (Durban): Zoomed Locality Map (1: 50 000)



Legend

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

Corners:

A= 29°42'20"S; 31°02'06"E
B= 29°42'21"S; 31°02'06"E
C= 29°42'22"S; 31°02'06"E
D= 29°42'21"S; 31°02'05"E

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

LEXeco

South Group Recycling (Durban) : 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

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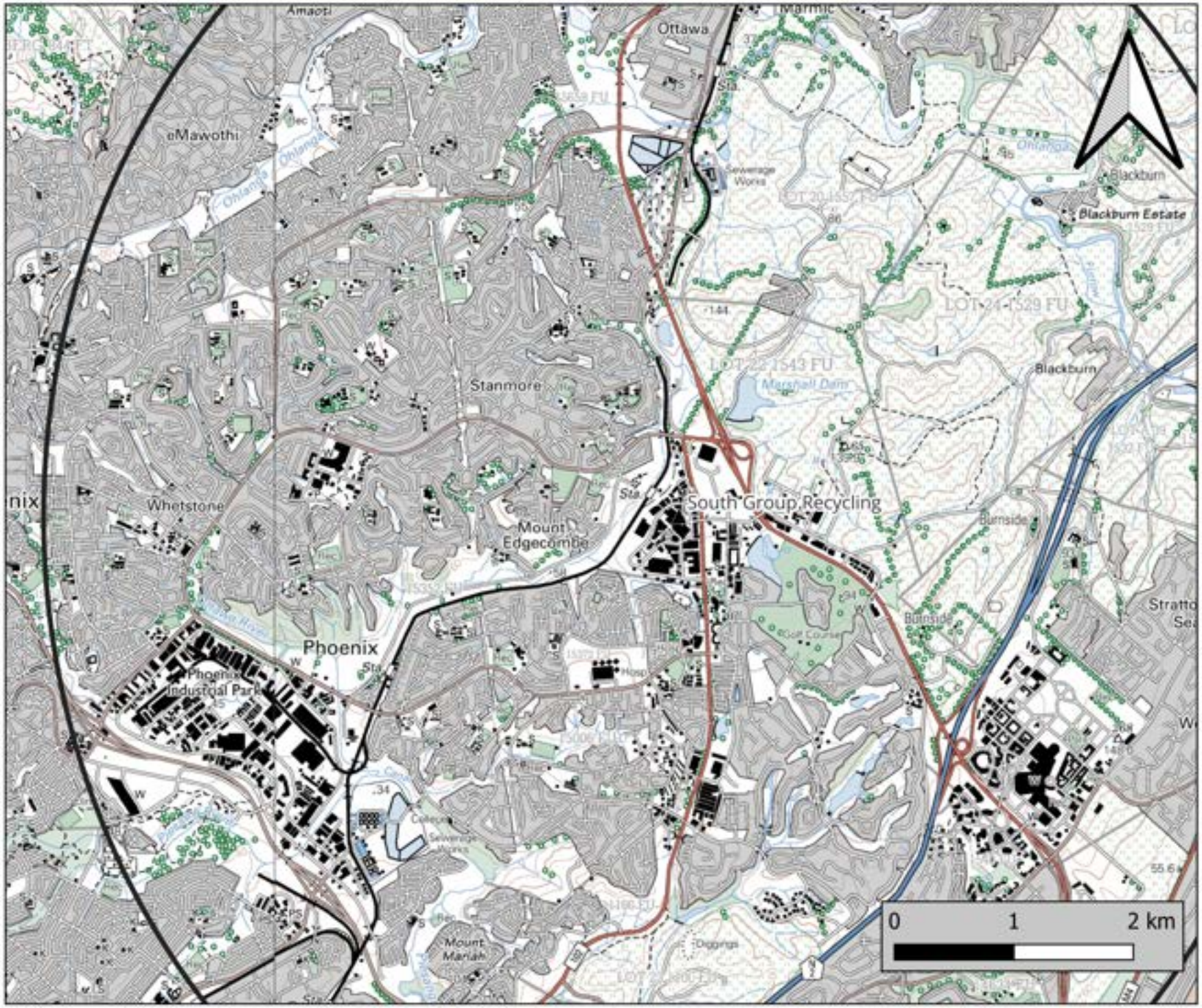
South Group Recycling (Durban): Topographic Map (1: 50 000)



Legend

- South Group Recycling
- 5 Km Buffer

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

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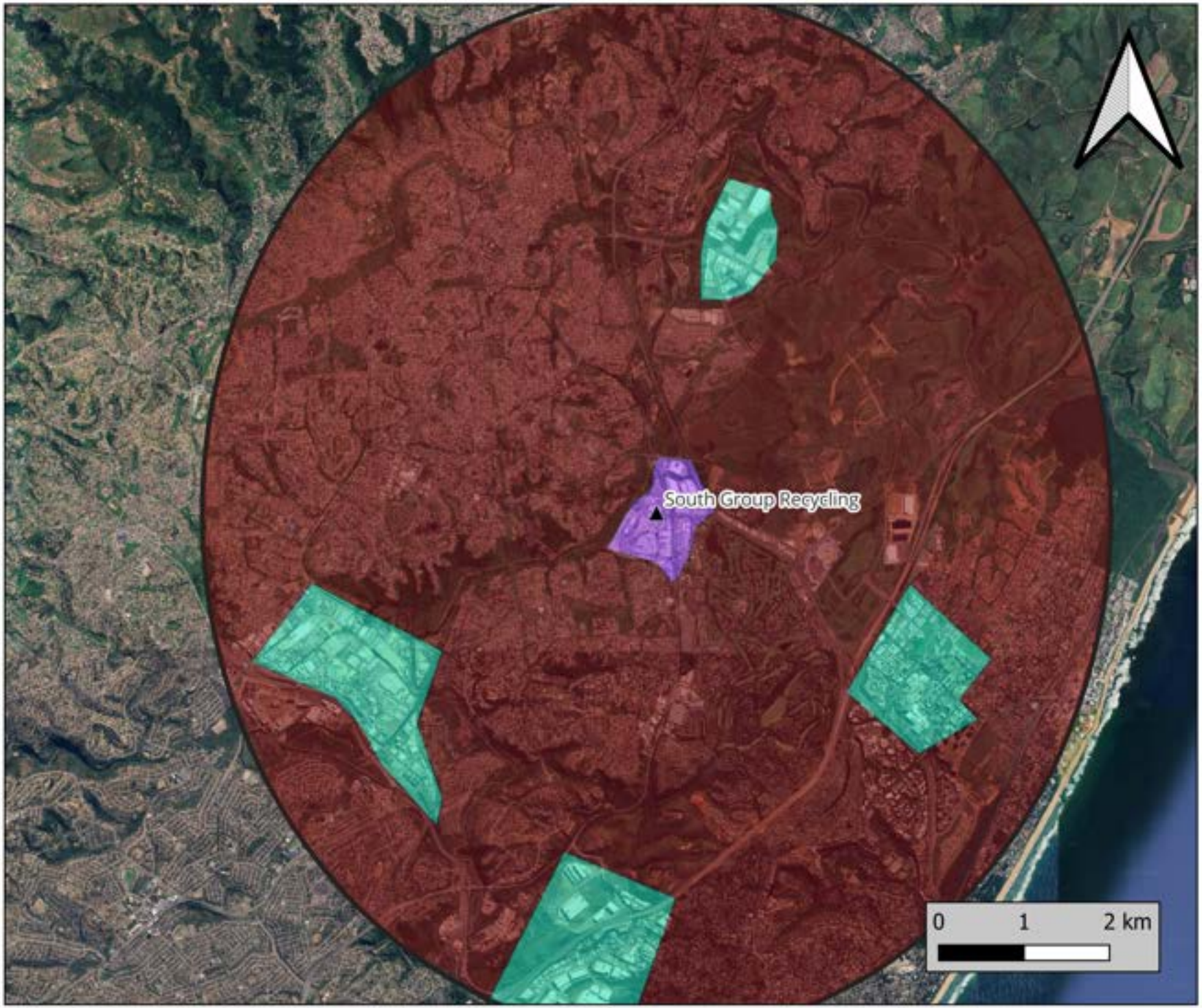
South Group Recycling (Durban): Land Use Map (1: 70 000)



Legend

- South Group Recycling
- 5 Km Buffer

Land Use

- Commercial
- Residential
- Industrial

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

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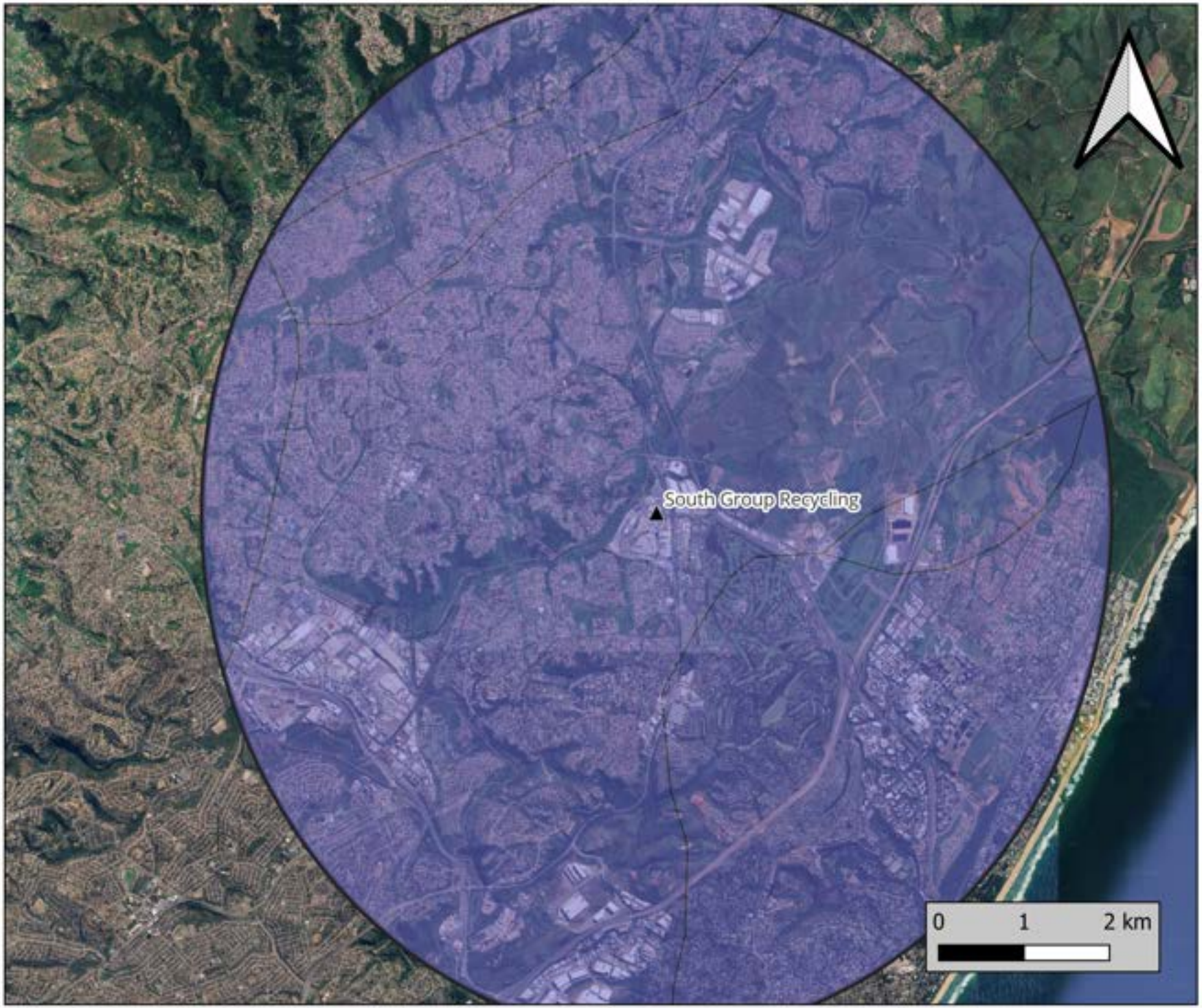
South Group Recycling (Durban): Geology Map (1: 70 000)



Legend

- South Group Recycling
- 5 Km Buffer

Geology

- Siliciclastic rocks

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

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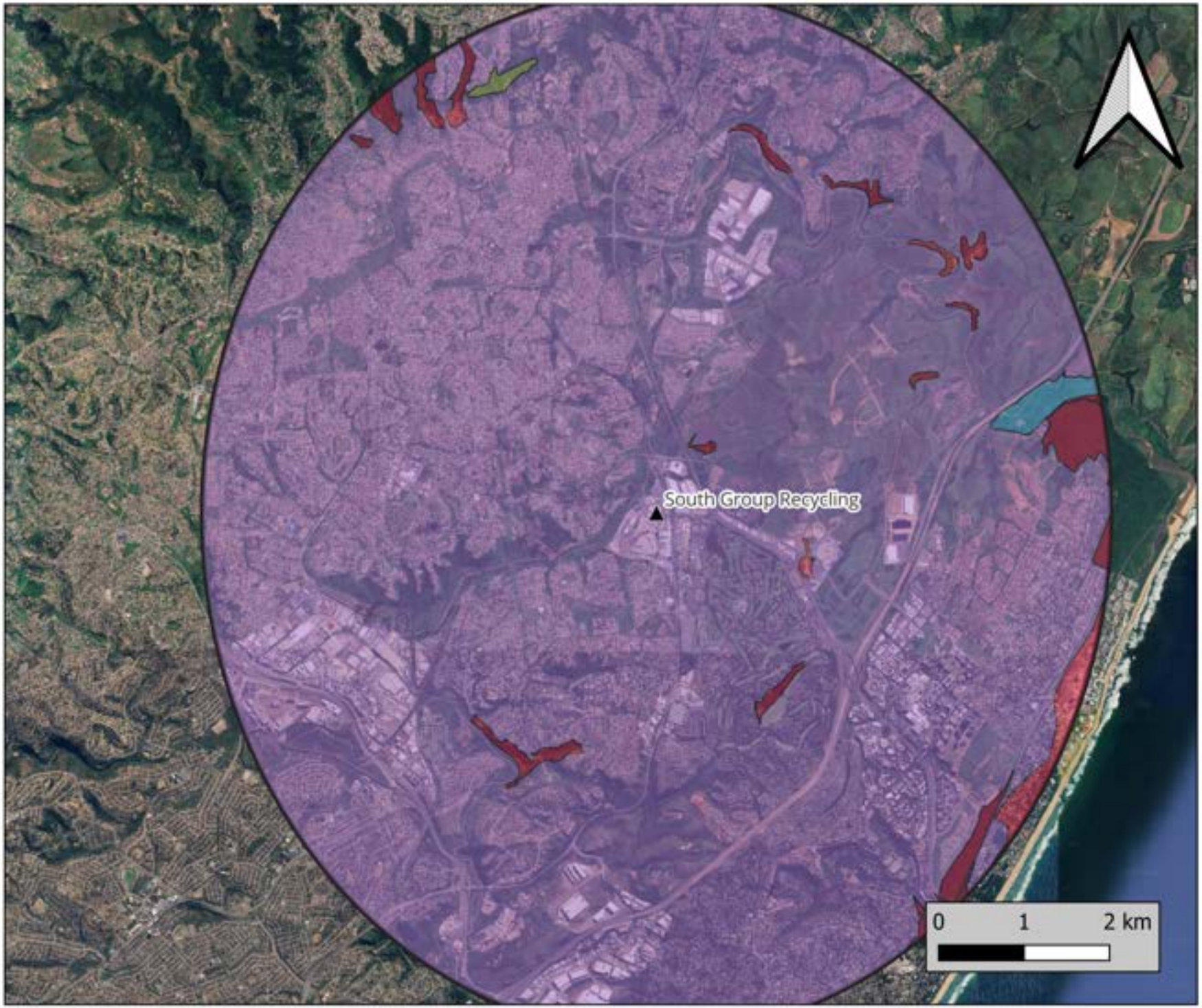
South Group Recycling (Durban): Vegetation Map (1: 70 000)



Legend

- South Group Recycling
- 5 Km Buffer

Vegetation

- KwaZulu-Natal Coastal Belt Grassland
- Non-terrestrial (estuarine habitat)
- Northern Coastal Forest
- Scarp Forest

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

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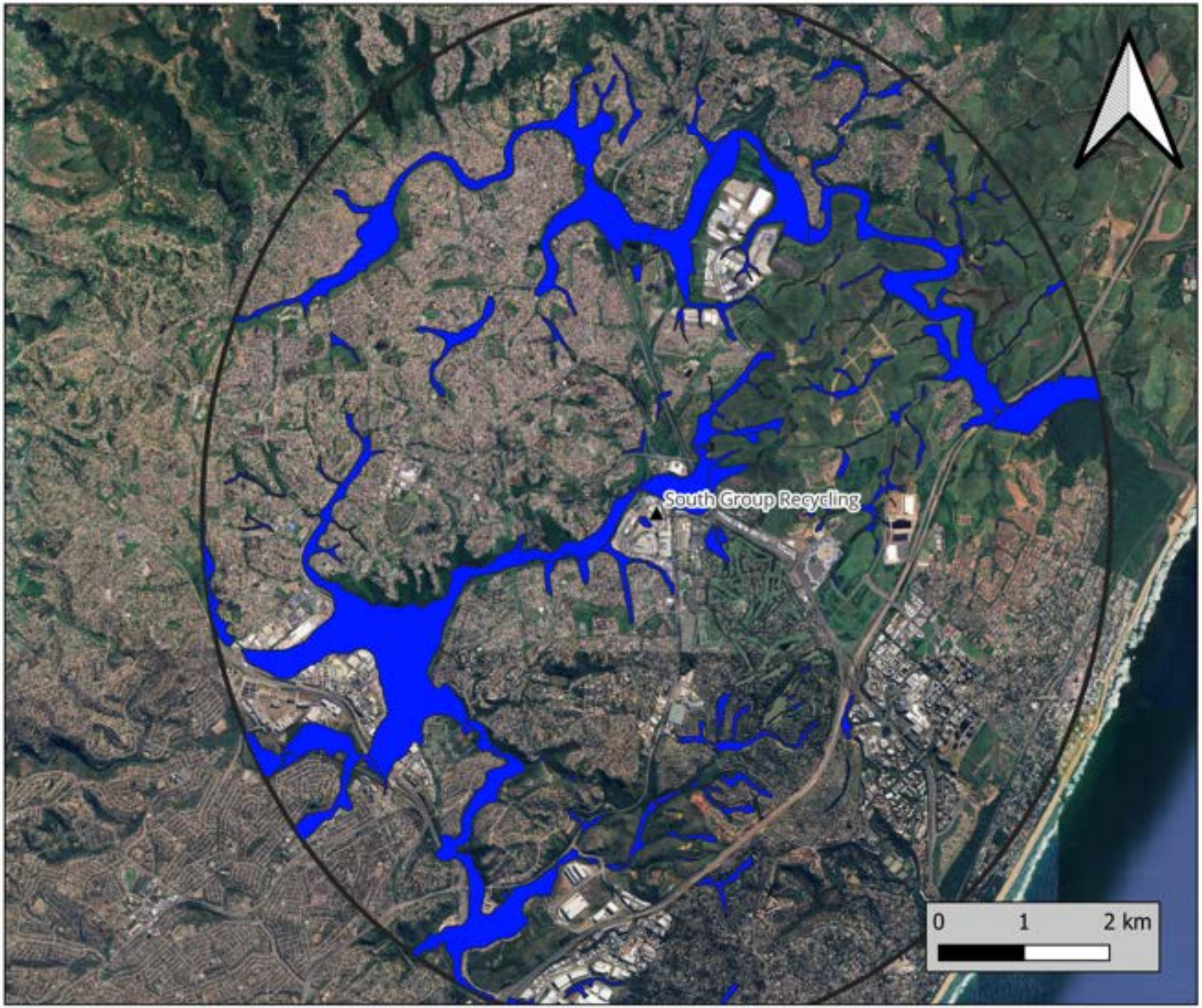
South Group Recycling (Durban): Vegetation Map (1: 70 000)



Legend

- South Group Recycling
- 5 Km Buffer
- Wetlands

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

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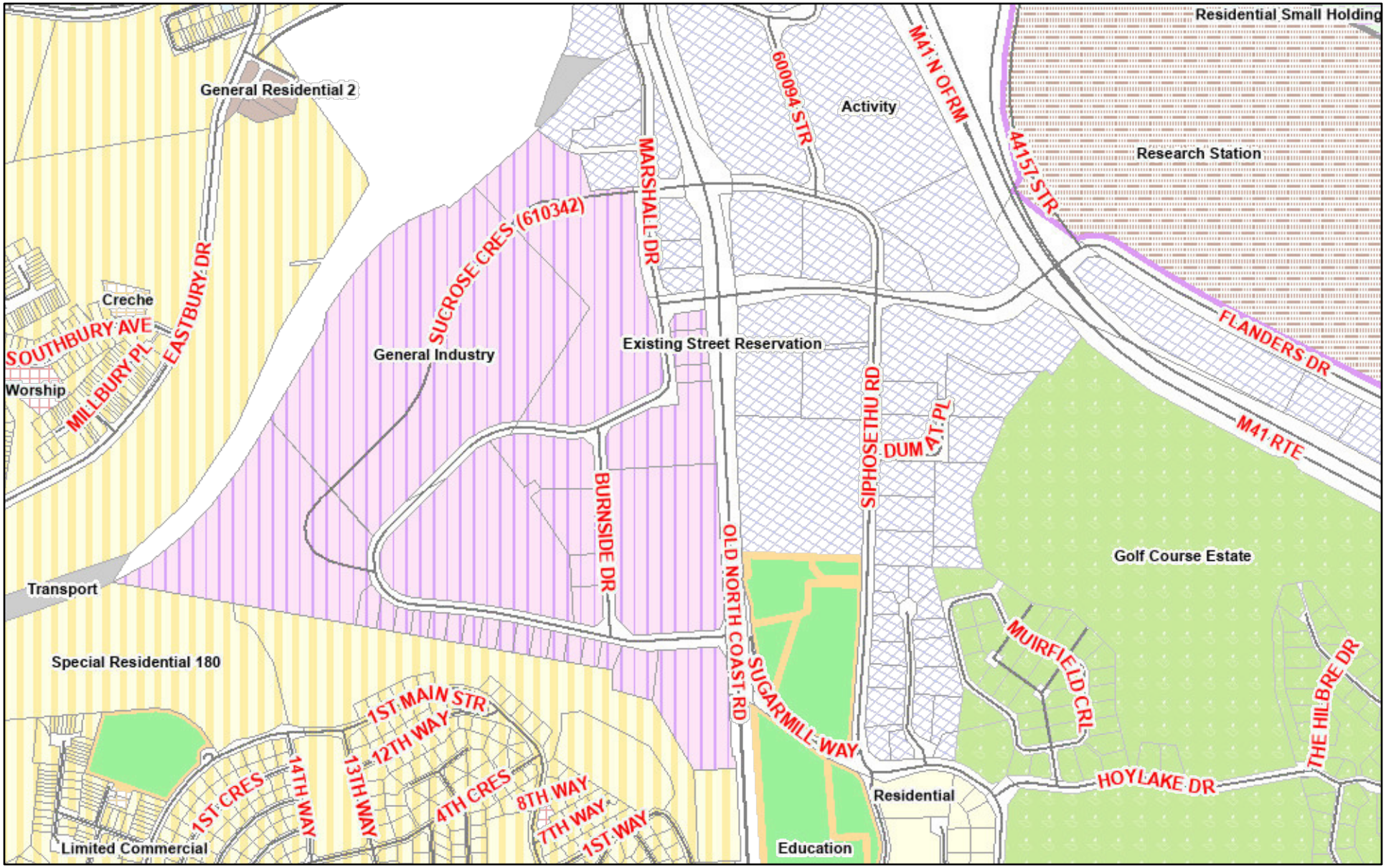
eThekwini Municipality 2026



January 8, 2026

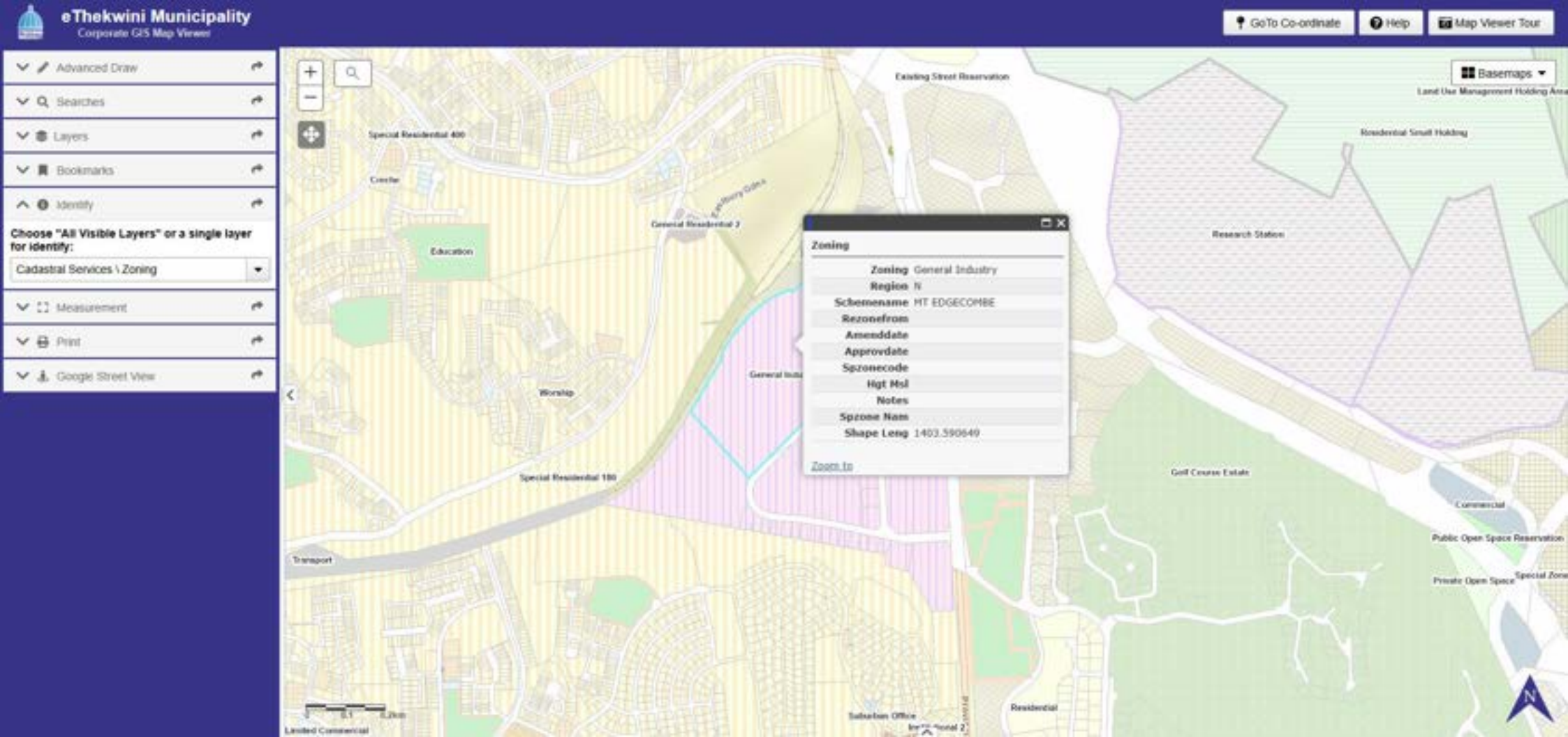
1:9,028

0 360 720 1,440 ft

0 110 220 440 m

Zoning

- Activity
- Creche
- Education
- Existing Street Reservation
- General Industry
- General Residential 2
- Golf Course Estate
- Limited Commercial
- Research Station
- Residential
- Residential Small Holding
- Special Residential 180
- Transport
- Worship
- Roads


eThekwini Municipality
Corporate GIS Map Viewer
GoTo Co-ordinate
Help
Map Viewer Tour
Advanced Draw
Searches
Layers
Bookmarks
Identify
Choose "All Visible Layers" or a single layer for identify:
Cadastral Services \ Zoning
Measurement
Print
Google Street View
Basemaps
Existing Street Reservation
Special Residential 400
Creche
General Residential 2
Education
Worship
Special Residential 180
Transport
Research Station
Residential Small Holding
Golf Course Estate
Commercial
Public Open Space Reservation
Private Open Space
Residential
Zoning
Zoning General Industry
Region N
Schemename MT EDGECOMBE
Rezonefrom
Amenddate
Approvdate
Spzonecode
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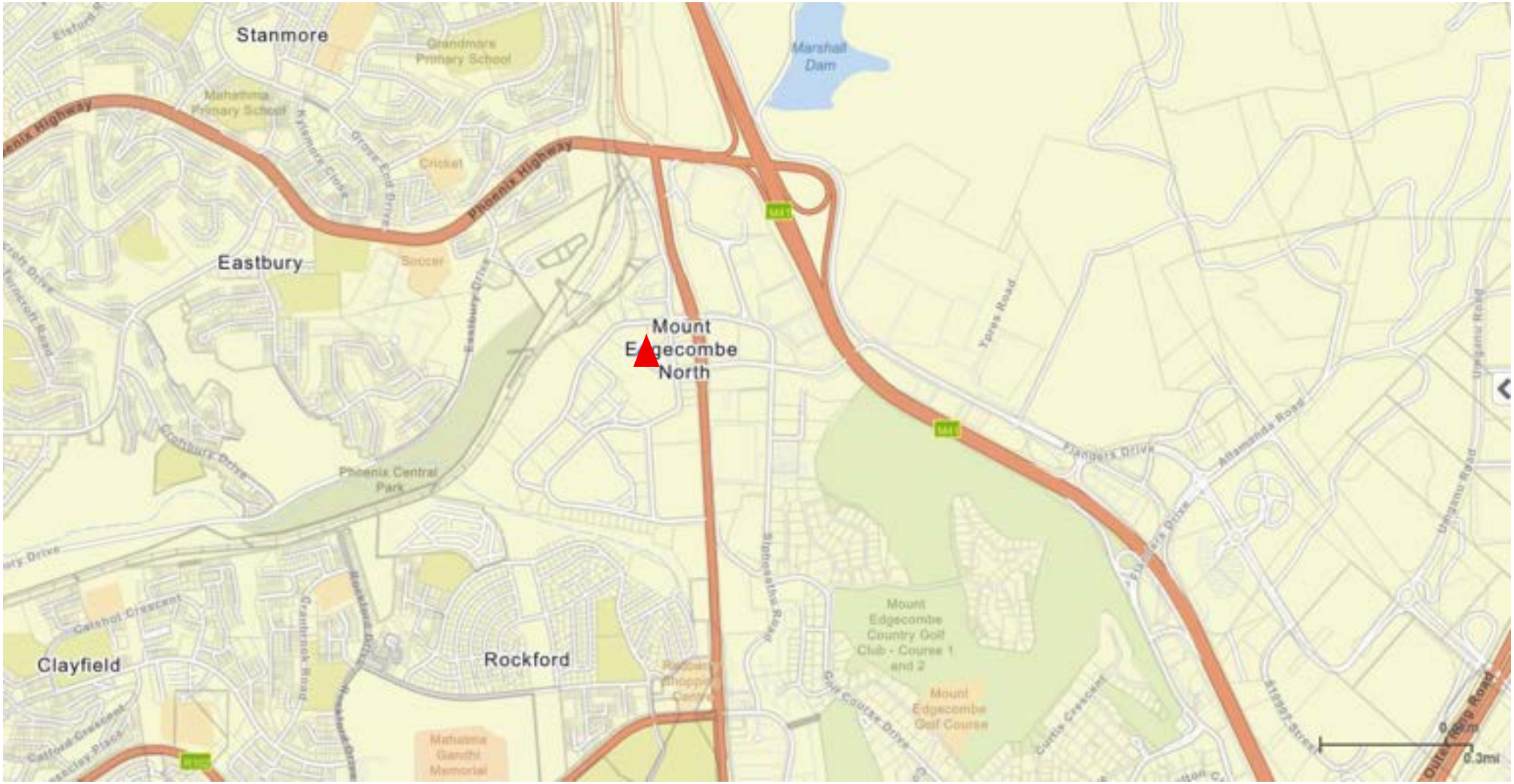
Stanmore
Grandmore Primary School
Marshall Dam
Mahatma Primary School
Phoenix Highway
Cricket
Eastbury
Soccer
Mount Edgecombe North
Ypres Road
Phoenix Central Park
Flanagrix Drive
Atamanda Road
Mount Edgecombe Country Golf Club - Course 1 and 2
Clayfield
Rockford
Mount Edgecombe Golf Course
Mahatma Gandhi Memorial
0.3mi


Siphosethu Road
Sucrose Crescent
Mount
Edgecombe
North
Marshall Drive
Chris Hani Road
Flanders Drive
Field Road
Sucrose Crescent
60m
200ft


Google Earth
80 m
N


Google Earth
N
200 m

Annexure C: Public Participation

To be included in Final Scoping Report

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

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From:	"Bongani Mashika"
To:	"Riette Landsberg" <Riette@lexeco.co.za>
Date:	1/19/2026 10:25:02 AM
Subject:	Re: Application for the Registration in terms of the Norms and Standards - South Group Recycling Durban

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 10:40 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 Durban

To whom it may concern,

On the 8th January 2025, an application for the registration of South Group Recycling, Durban 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"
To:	Licensing <licensing@dffe.gov.za>
Date:	1/8/2026 11:54:26 AM
Subject:	Re: Application for the Registration in terms of the Norms and Standards - South Group Recycling Durban
Attachments:	1. South Group DBN_N.S Application.pdf South Group DBN_N.S App_Cover Letter.pdf

To whom it may concern,

Please find attached a copy of an application for the registration of the South Group Recycling - Durban 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 Assessment Practitioner

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
Environmental 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, Durban Operations

South Group Recycling (Pty) Ltd (South Group Recycling) operates a waste storage and transfer facility located at 65 Marshall Drive, Mount Edgecombe, Durban and falls within the jurisdiction of the eThekwini 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,

Riette Landsberg
Environnemental Consultant
LexEco Pty (Ltd)

forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

www.evironment.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@passa.co.za durban@south-group.co.za
Telephone:	*	071 761 7262
Cell phone	*	071 761 7262
Fax Number	*	None

Postal Address:	*	65 Marshall Drive, Unit 4, Mount Edgecombe
Postal Code	*	4300
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 / 04 / 01
Storage of Waste	*	**X**
Extraction, Flaring or Recovery of Landfill Gas	*	[redacted]
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	*	[redacted]
SECTION C: SITE INFORMATION:		
Site Name:	*	South Group Recycling - Durban
Site Telephone Number:	*	073 094 6880
Owner (company or municipality name):	*	Company

<table>
<tr><td>Owner VAT Registration Number (if applicable):</td><td></td><td>4020295244</td></tr>
<tr><td>Public or Commercial:</td><td>*</td><td>Commercial</td></tr>
<tr><td>Province:</td><td>*</td><td>Kwazulu-Natal</td></tr>
<tr><td>Municipality:</td><td>*</td><td>Ethekwini Municipality</td></tr>
<tr><td>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 (<u>no other format is acceptable)</u></td><td>*</td><td><table>
<tr><th>Corner ID</th><th>Latitude</th><th>Longitude</th></tr>
<tr><td>Corner A</td><td>29°42'20.83"S</td><td>31° 2'6.29"E</td></tr>
<tr><td>Corner B</td><td>29°42'21.37"S</td><td>31° 2'7.15"E</td></tr>
<tr><td>Corner C</td><td>29°42'22.31"S</td><td>31° 2'6.47"E</td></tr>
<tr><td>Corner D</td><td>29°42'21.75"S</td><td>31° 2'5.56"E</td></tr>
</table></td></tr>
<tr><td>Physical Address: Street or Erf</td><td>*</td><td>65 Marshall Drive, Unit 4, Mount Edgecombe</td></tr>
<tr><td>Physical Address: City</td><td>*</td><td>Durban</td></tr>
<tr><td>Physical Address: Postal Code:</td><td>*</td><td>4300</td></tr>
<tr><td>Size of the facility</td><td>*</td><td>1 000 m^2</td></tr>
<tr><td>Proximity of the facility to the nearest residential area</td><td>*</td><td>± 600 m</td></tr>
<tr><td>Land use/ zoning (Attach proof)</td><td>*</td><td>Industrial</td></tr>
<tr><td>Approved Civil Engineering Designs (Attach, where applicable in terms of relevant building regulations and bylaws)</td><td>*</td><td>Not Applicable</td></tr>
</table>

*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	30 tons / month	Various	South Group Recycling Durban
Spent catalytic converters	5 tons / month	Various	
Ferrous and Non-ferrous scrap metal	10 tons/ month	Various	
Plastic	5 tons/month	Various	Local General Waste Recyclers
Paper / Cardboard	3 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 _____ (duly authorised to sign on behalf of Owner of the Facility)

Date: 13.11.25 Place: Edenvale.

726832-1
CS-7

Signature of the Commissioner of Oaths:

2025-11-13
Date:

CS.7, 10th, 1st Avenue Edenvale 1609
Designation:

Official stamp (Above)

SOUTH AFRICAN POLICE SERVICE
SUPPLY CHAIN MANAGEMENT
2025 -11- 13
EDENVALE
SOUTH AFRICAN POLICE SERVICE

SECTION F: DECLARATION BY THE LAND OWNER

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

I, JAYENDRA KANJEE MAGJEE 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

THE NUMBER ELEVEN TRUST

Name of company:

12 NOVEMBER 2025

Date:

Signature of the Commissioner of Oaths:

12 NOVEMBER 2025

Date:

GTP CIBA PR.

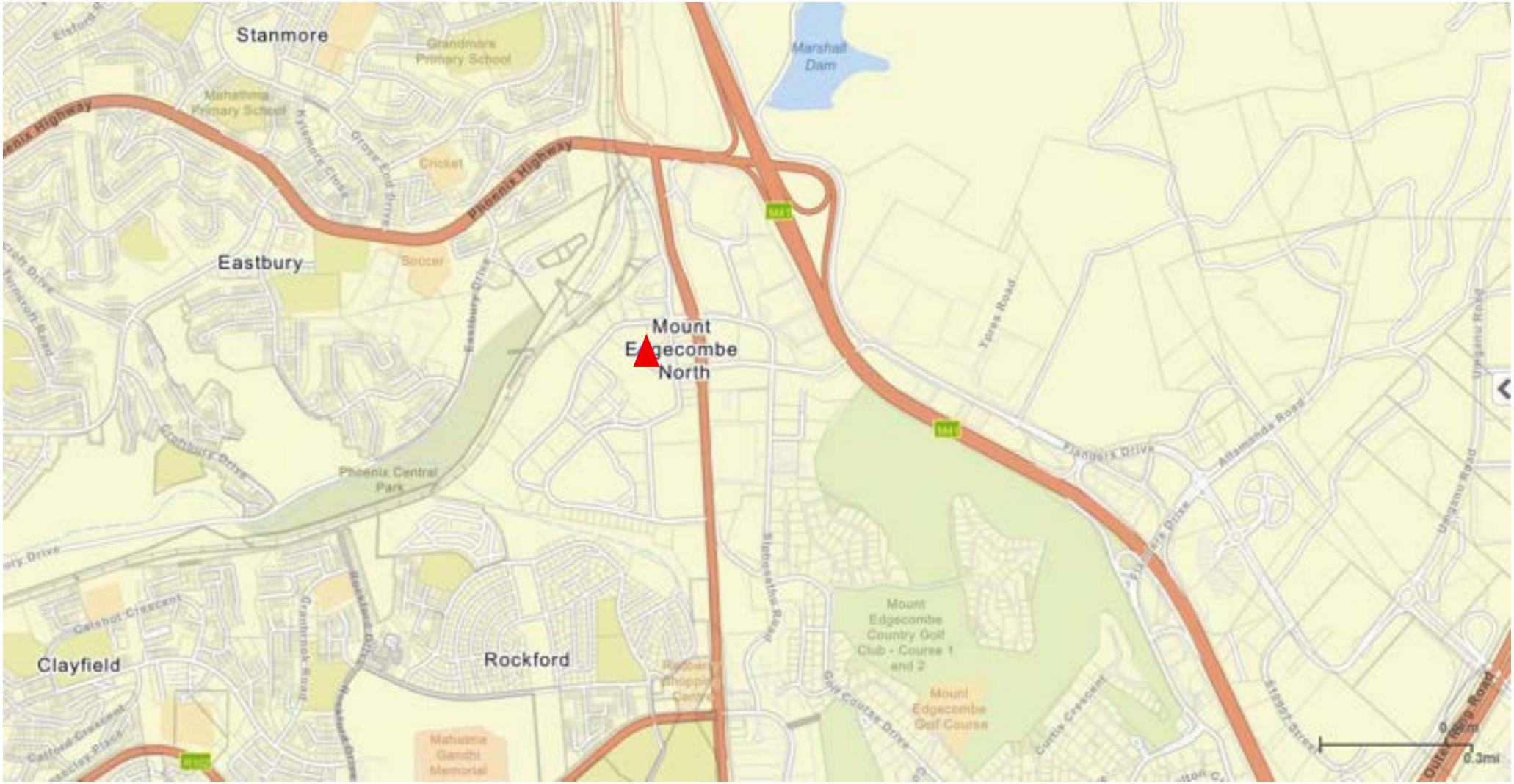
Designation:

Official stamp (Above)

CHERYL ANNE LEATHER
Commissioner of Oaths
GTP (SA) BAP (SA)
51 Athlone Towers
23 Lower Bridge Road
Durban North, 4051

Annexure A
Site Location

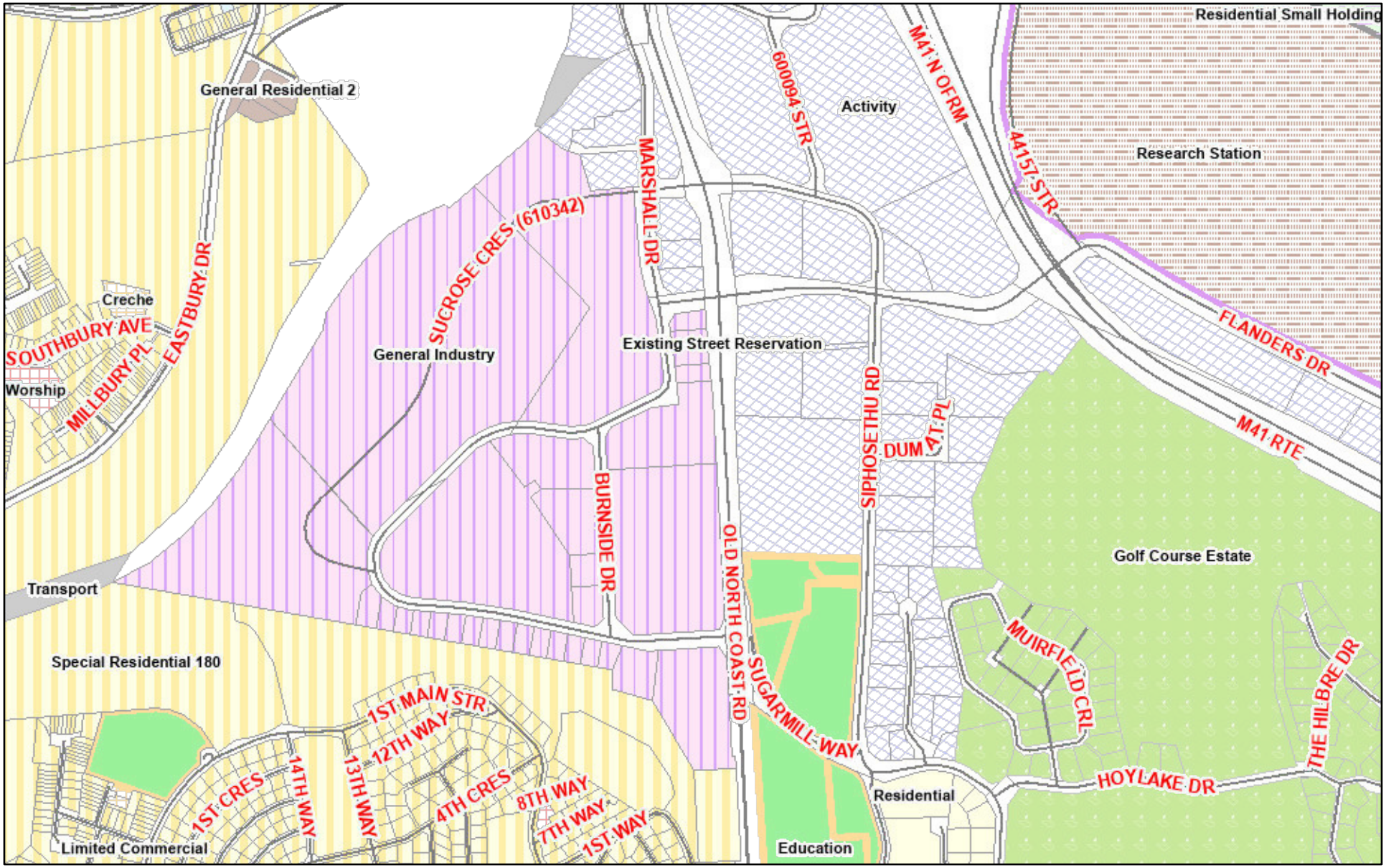

Legend
South Group Recycling_DBN
Google Earth
60 m
N


Stanmore
Grandmore Primary School
Marshall Dam
Mahathma Primary School
Phoenix Highway
Cricket
Eastbury
Soccer
Mount Edgecombe North
Ypres Road
Phoenix Central Park
Flanagrix Drive
Atamanda Road
Mount Edgecombe Country Golf Club - Course 1 and 2
Clayfield
Rockford
Mount Edgecombe Golf Course
Mahatma Gandhi Memorial
0.3mi


Siphosethu Road
Sucrose Crescent
Mount
Edgecombe
North
Marshall Drive
Chris Hani Road
Flanders Drive
Field Road
Sucrose Crescent
60m
200ft

Annexure B
Property Zoning

eThekwini Municipality 2026



January 8, 2026

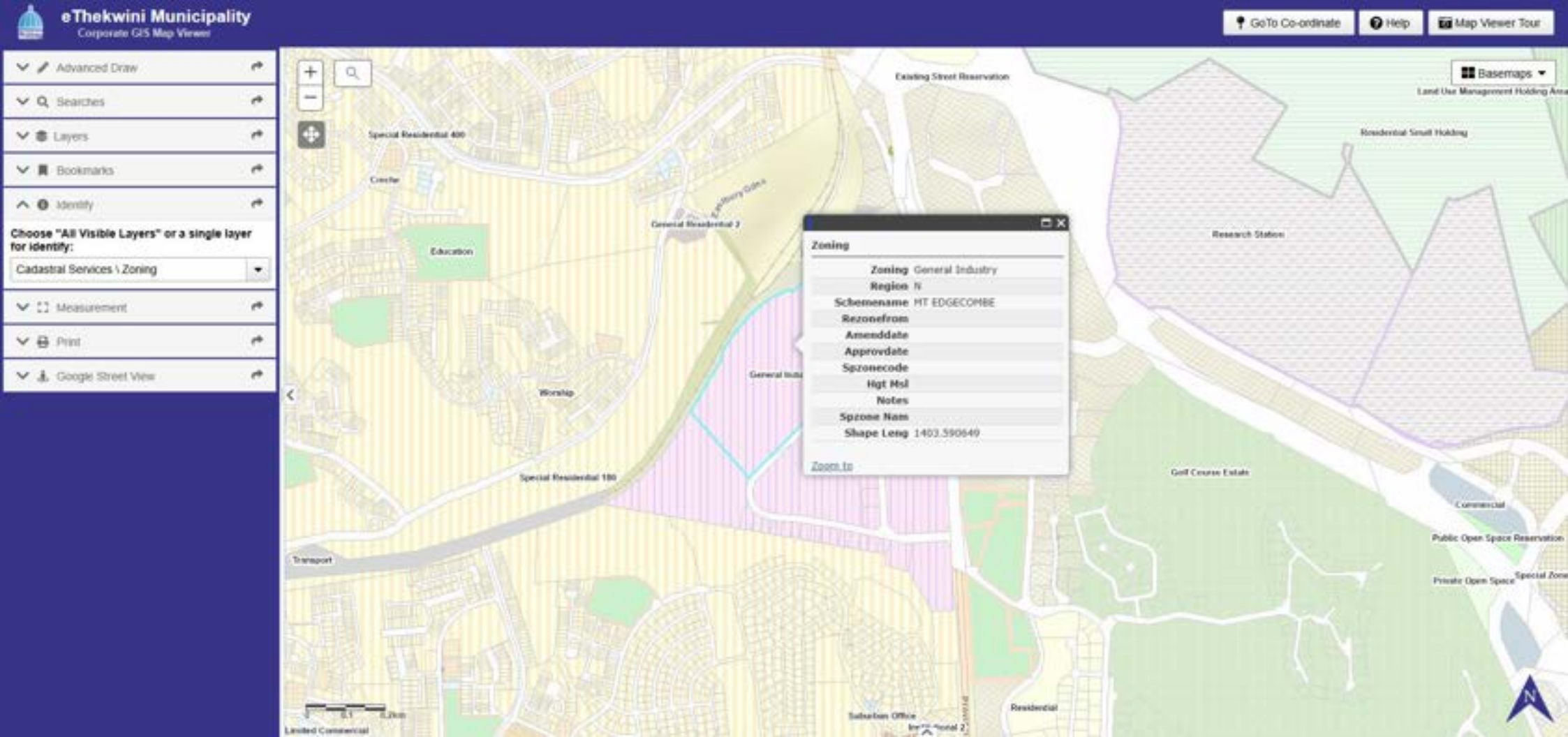
1:9,028

0 360 720 1,440 ft

0 110 220 440 m

Zoning

- Activity
- Creche
- Education
- Existing Street Reservation
- General Industry
- General Residential 2
- Golf Course Estate
- Limited Commercial
- Research Station
- Residential
- Residential Small Holding
- Special Residential 180
- Transport
- Worship
- Roads


eThekwini Municipality
Corporate GIS Map Viewer
GoTo Co-ordinate
Help
Map Viewer Tour
Advanced Draw
Searches
Layers
Bookmarks
Identify
Choose "All Visible Layers" or a single layer for identify:
Cadastral Services \ Zoning
Measurement
Print
Google Street View
Basemaps
Zoning
Zoning General Industry
Region N
Schemename MT EDGECOMBE
Rezonefrom
Amenddate
Approvdate
Spzonecode
Hgt Msl
Notes
Spzone Nam
Shape Leng 1403.590649
Zoom to
Existing Street Reservation
Special Residential 400
Creche
General Residential 2
Education
Worship
Special Residential 180
Transport
Research Station
Residential Small Holding
Golf Course Estate
Commercial
Public Open Space Reservation
Residential

Annexure E: Copy of Exporter Permit

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LEGAL INSIGHT. SUSTAINABLE IMPACT.

+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

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 №: 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 №.: 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

FORM PMEA

Licence Number
AP22082

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 Only

Via 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

SADPMR
SOUTH AFRICAN DIAMOND & PRECIOUS METALS REGULATOR

S/No. 3435

International Trade Administration Commission of South Africa

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 bene fit 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 releva nt 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 P APER.

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

enabling FAIR TRADE

Annexure F: National Screening Tool Report

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

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 - Durban_Waste Management License Application

Project title: South Group Recycling - Durban_Waste Management License Application

Date screening report generated: 13/10/2025 12:15:29

Applicant: South Group Recycling (Pty) Ltd

Compiler: LexEco

Compiler signature:

.....

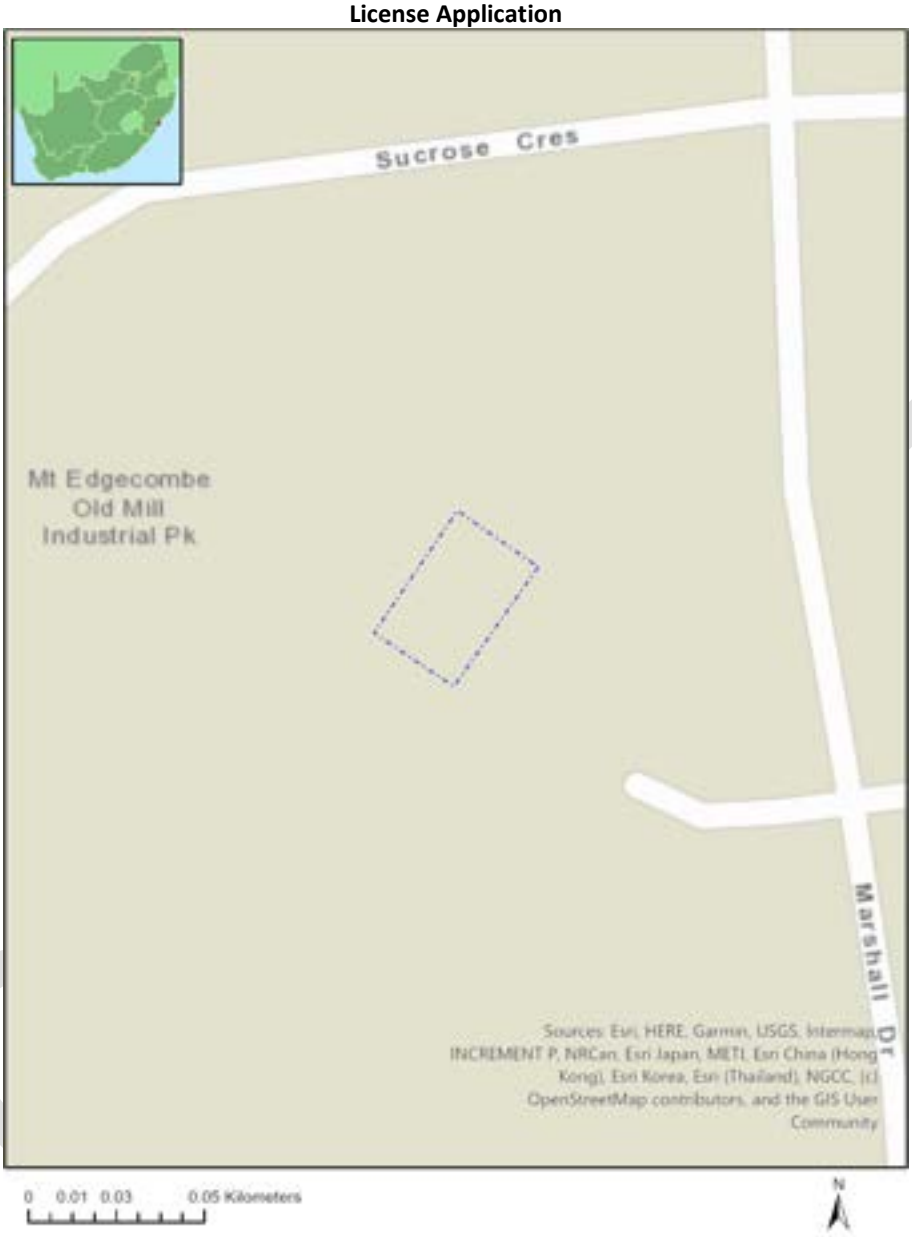
Application Category: Services|Waste Management Services|Storage Facilities|Hazardous

Table of Contents

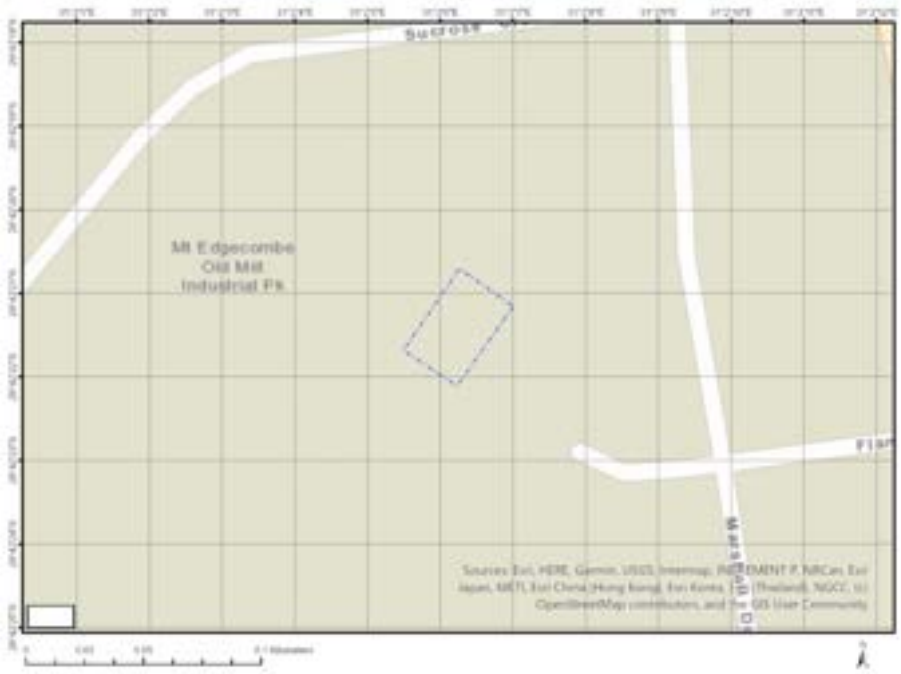
Proposed Project Location

Orientation map 1: General location

General Orientation: South Group Recycling - Durban_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	MOUNT EDGECOMBE	3196	4	29°42'21.28S	31°2'7.41E	Erven

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

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

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	12/12/20/2349	Solar PV	Approved	15.4

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

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: **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-Eastern Corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Combined_EGI.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)
Very High	11. High

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)
High	Aves-Stephanoaetus coronatus
Medium	Mammalia-Chrysospalax villosus
Medium	Sensitive species 8
Medium	Invertebrate-Arytropteris basalis
Medium	Invertebrate-Pomatonota dregii
Medium	Invertebrate-Phymeurus illepidus

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)
Very High	Within 2km of a Grade II Heritage site

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Between 8 and 15 km from a major civil aviation aerodrome
High	Within 8 km of other civil aviation aerodrome
Medium	Between 15 and 35 km from a civil aviation radar

MAP OF RELATIVE DEFENCE THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Features with a Medium 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	EN_KwaZulu-Natal Coastal Belt Grassland

Annexure G: Site Verification Report

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Site Verification Report

South Group Recycling (Pty) Ltd, Durban

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

11 February 2026
Report Nr: SGR-0006-LEX-2026

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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, Durban
Report Date	11 February 2026
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Applicant Details	**South Group Recycling, Durban** Unit 4 at 65 Marshall Dr, Mount Edgecombe, Durban, 0182 **Contact Person:** Wayne Clancy Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@south-group.co.za
Application Reference No:	Not Yet Available

1. INTRODUCTION AND PROJECT BACKGROUND

South Group Recycling (Pty) Ltd ("South Group") operates a small-scale waste storage and transfer facility located at 65 Marshall Drive, Mount Edgecombe, Durban which falls within the jurisdiction of the eThekwini 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 convertors. Once received the material is subject to manual sorting before being repackaged and exported for further processing and refining.

South Group, Durban 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.

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 located at 65 Marshall Dr, Mount Edgecombe, Durban which falls within the jurisdiction of the eThekwini Municipality. Operations are housed within a warehouse which forms part of an already developed industrial area which can be access via established roads, including Marchall Drive and Flanders Drive and regional roads and highways such as the R102 and M41.

According to the eThekwini Central Zoning Scheme, the proposed site is zoned as "*General Industrial*" which supports the current land use. Areas to the South and West of the industrially zoned area are dominated

by residential areas inclusive of Rockford, Greenbury, Pheonix and Eastbury. North-east of the site, the majority of land is covered by sugar cane plantations for which the area was well known up until the early 1990's. South-east of the site, the Mount Edgecombe Country Estate was established which houses a large golf course and up scale residential houses.

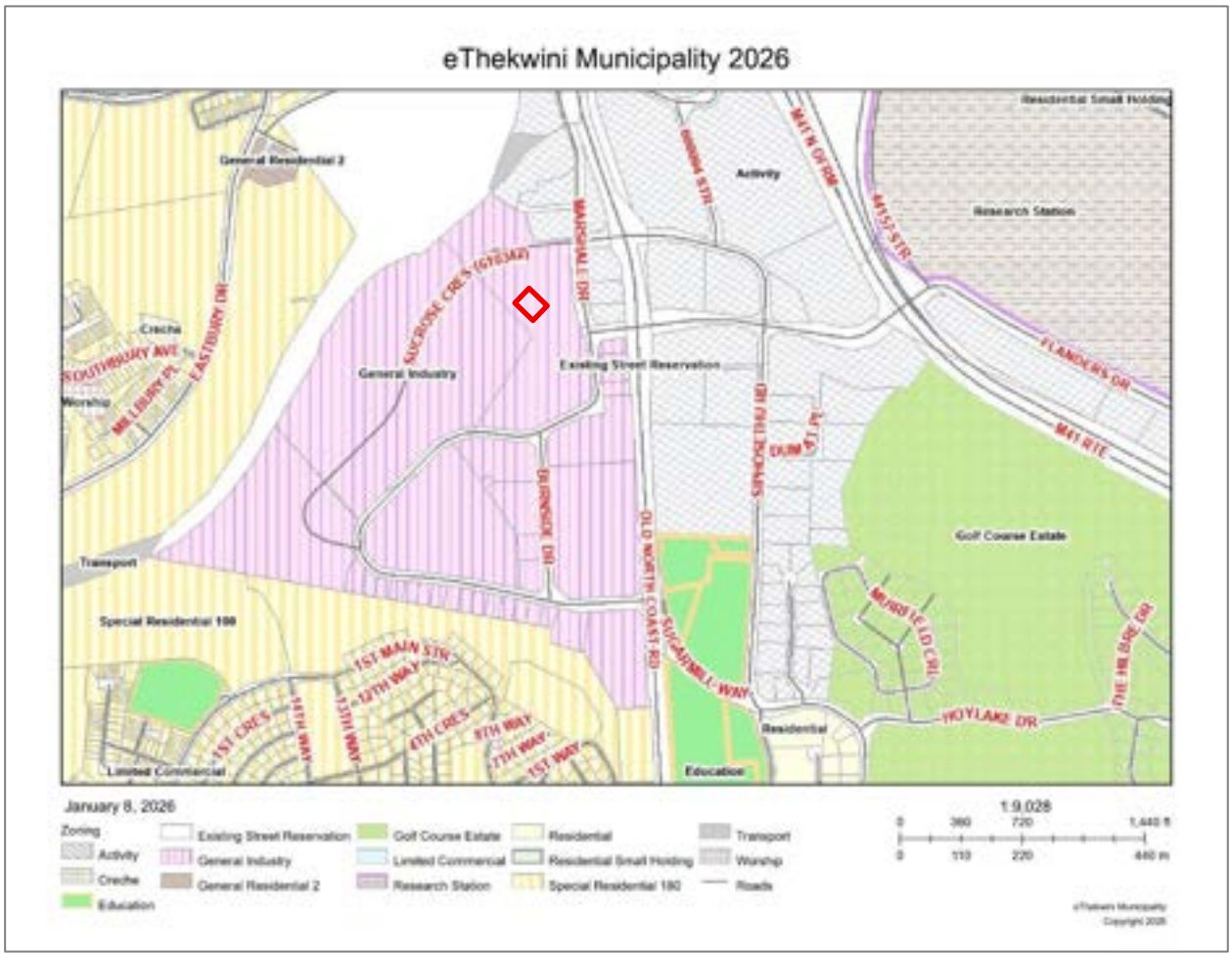

Figure 1: eThekwini Municipal Zoning

According to historic records, the Month Edgecombe area was one of KwaZulu-Natal's oldest and most industrious sugar estates. The Mount Edgecombe Sugar Mill was established in 1859. Over the years the mill continued operation, outlasting several ownership changes. With the onset of the modern age, the sugar industry began facing more pressure from the growing international trade creating competition as well as declining profitability. The property industry also became more lucrative, with estates and malls replacing cane fields. By 1994, the Mount Edgecombe Sugar Mill was closed. The remaining industrial site and associated infrastructure was later converted for general industrial use. South Group, Durban also now

form part of the pre-existing facility. Refer to Figure 1 below for an aerial view of the local area and the South Group site.

Figure 2: Areial View of the Mount Edgecombe industrial area and South Group, Durban 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 65 Marshall Drive (Industrial Complex)

Photo 2: Street view entrance to South Group Recycling, Durban

Photo 3: Internal view of industrial operations

Photo 4: Overall view of industrial operation

Photo 5: Overall view of industrial operation

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	×			
Animal Species Theme		×		
Aquatic Biodiversity Theme				×
Archaeological and Cultural Heritage Theme	×			
Civil Aviation Theme		×		
Defence Theme				×
Palaeontology Theme			×	
Plant Species Theme				×
Terrestrial Biodiversity Theme	×			

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, Durban operations are located within a pre-existing warehouse which forms part of a historic industrial site. The "High" Agricultural sensitivity identified is however contributed to the site and surrounding area's historic land use. Between the mid to late 1800's and 1990's the area was dominated by sugarcane plantations which at its peak was a thriving empire. Over time, pressures and competition from international markets and trades in combination with a fast-growing property and urbanisation of the area led to a decrease in sugar cane plantations. The Mount Edgecombe Sugar Mill was later converted to support general industrial operations which also now include the South Group, Durban operations.

The existing land use for the site was also 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 "*High*" 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
Aves - Stephanoaetus coronatus	"*High*"	*Stephanoaetus coronatus* or the Crowned Eagle inhabits a widespread area in sub-Saharan Africa. The Crowned Eagle has been documented in easternmost Sudan and South Sudan, western Ethiopia, southernmost Senegal, Guinea-Bissau, Guinea, Liberia, Côte d'Ivoire, Ghana and southern Togo, southern Nigeria and Cameroon, through Gabon, into Congo and Democratic Republic of Congo, South to North-western Angola, east to Uganda, Kenya and Tanzania, South-east through Zambia, Malawi and Mozambique, to Northern and eastern Zimbabwe, North-eastern, Eastern and South-eastern South Africa and Swaziland. The Crowned Eagle primarily inhabits dense woodlands, rainforests and riverine forests. In Southern Africa, they're concentrated in eastern areas, strongly tied to escarpment and lowland forests. Mount Edgecombe and its surroundings fall well within the documented habitat region frequented by the Crowned Eagle, however decades of deforestation and continued encroachment of human activity have led to severe habitat loss in the area. Establishment of large-scale sugar cane plantations in the 1850's up to the 1990's has led to the eradication of suitable habitat which supports the crowned Eagle. No signs or recorded sightings of the Cowered Eagle have been recorded in the area in recent years, further supporting the conclusion that the likely occurrence of the species in Mount Edgecombe is low.	"*Low*"

Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
Mammalia-Chrysospalax villosus	Medium	The *Mammalia-Chrysospalax villosus*, commonly known as the Rough-haired Golden Mole is a small, blind, insectivorous mammal, native to South Africa and known for its coarse, shiny fur, powerful digging claws and preference for sandy grasslands. The Rough-Haired Golden Mole is prone to sandy soils within grasslands, meadows, and marsh edges, including gardens and golf courses. Due to the nature of the proposed site and surrounding developments the potential presence of the rough-haired Golden Mole is considered to be low. The South Group, Durban operations are located in an industrial area which is characterised by paved and concreted surfaces and warehouse structures. Ongoing industrial activity is also prone to create vibrational impacts which influence the mole, as the mammal relies on vibrations for hunting. In conclusion, the site and surrounding land use is not considered to be a supportive habitat within which the Rough-haired Golden Mole would be able to survive. The potential for the Rough-haired Golden Mole to be present within the industrial footprint or within vicinity to the project site is considered to be low.	***Low***
Invertebrate-Arytropteris basalis	Medium	Both Arytropteris basalis (commonly known as the Flat-necked shieldback bush cricket) and Pomatonota dregii (commonly known as the East Coast Katydid) are native to South Africa and can only be found in the lush coastal forests of Kwazulu-Natal. The Flat-necked shieldback bush cricket is commonly found several meters above ground in the dense shades of forest vegetation. The East Coast Katudid also prefers life in the trees as the species is prone to feeding on a variety of tree species, especially native acacias. Both species have been documented to only occur within the Indian Ocean Coastal Belt forests which over the last few	***Low***

Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
Invertebrate- Pomatonota dregii	"*Medium*"	decades have declined due to urbanisation and deforestation to make room for agricultural development of commercial timber and sugar cane plantations. The current site occupied by South Group Recycling is located in the heart of a pe-existing sugar cane plantation. The old Sugar Cane Mill was later closed and the remaining property converted in order to support modernised industrial activities. The South Group, Durban facility forms part of the industrial complex. Limited natural vegetation remains within the Mount Edgecombe area and proposed site. The industrialisation of the site limits the potential for the presence of both the Flat-necked Shieldback bush cricket and East Coast Katydid as the preferred habitat for both species is no longer present.	*"Low"*
Invertebrate- Phymeurus illepidus	*"Medium"*	*Phymeurus illepidus* is the scientific name for the Durban Agile Grasshopper, an invertebrate species that is currently assessed as vulnerable due to habitat loss. The species is associated with dry, open grass vegetation and potentially forest edges. The industrial site and associated operations in the industrial area of Mount Edgecombe make for a hostile environment which does not support the chosen habitat of the Durban Agile Grasshopper. Potential for the species to habitate the area after years of urban, agricultural and industrial development is considered to be low.	*"Low"*

The site sensitivity verification disputes the Screening Tool's "High" 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.

Due to the overall climate associated with South-Africa's eastern coastline and topography, the Mount Edgecombe area is rich in different water features including wetlands, dams and streams. No natural water resources are however located on or within direct vicinity to the project site. The nearest water resources

to the site include the Marshall dam, located within the bounds of the Blacburn Estate, approximately 800m to the North-east of the project area and a dam forming part of the Mount Edgecombe estate and golf course approximately 650m to the South-east of the project site. The Ottawa River, splitting from the Piesang River separates Mount Edgecombe from the area referred to as Pheonix and is located approximately 320m, North-west of the project site.

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 "*Very High*" sensitivity in terms of heritage and cultural importance.

The South Group, Durban operations are located in the Mount Edgecombe 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 site is the Phoenix Settlement which is located approximately 5.7km west of the site.

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 disputes the Screening Tool's "Very High" sensitivity rating for the archaeological and cultural heritage theme and confirms the archaeological and cultural heritage theme to be "*Low*".

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 8 km southeast of the Virginia Airport and 11 km Northeast of the King Shaka International Airport.

The current waste storage and transfer operations undertaken by South Group, Durban 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 archaeological and cultural heritage theme and confirms the archaeological and cultural heritage 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 "Low" sensitivity towards the Relative Defence Theme.

The current waste storage and transfer operations undertaken by South Group, Durban 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 confirms the Screening Tool's "*Low*" 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 "*Medium*" sensitivity towards the Palaeontology Theme.

The South Group, Durban operations are located in the Mount Edgecombe area 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, Durban 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 disputes the Screening Tool's "*Medium*" sensitivity rating for the palaeontology theme and confirms the palaeontology 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.

3.8. Plant Species Theme

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

The Mount Edgecombe area falls within the KwaZulu-Natal Coastal Belt Grassland with scattered remnants of Northern Coastal forests. The area has however been subject to deforestation and vegetation clearance for the cultivation of sugar cane.

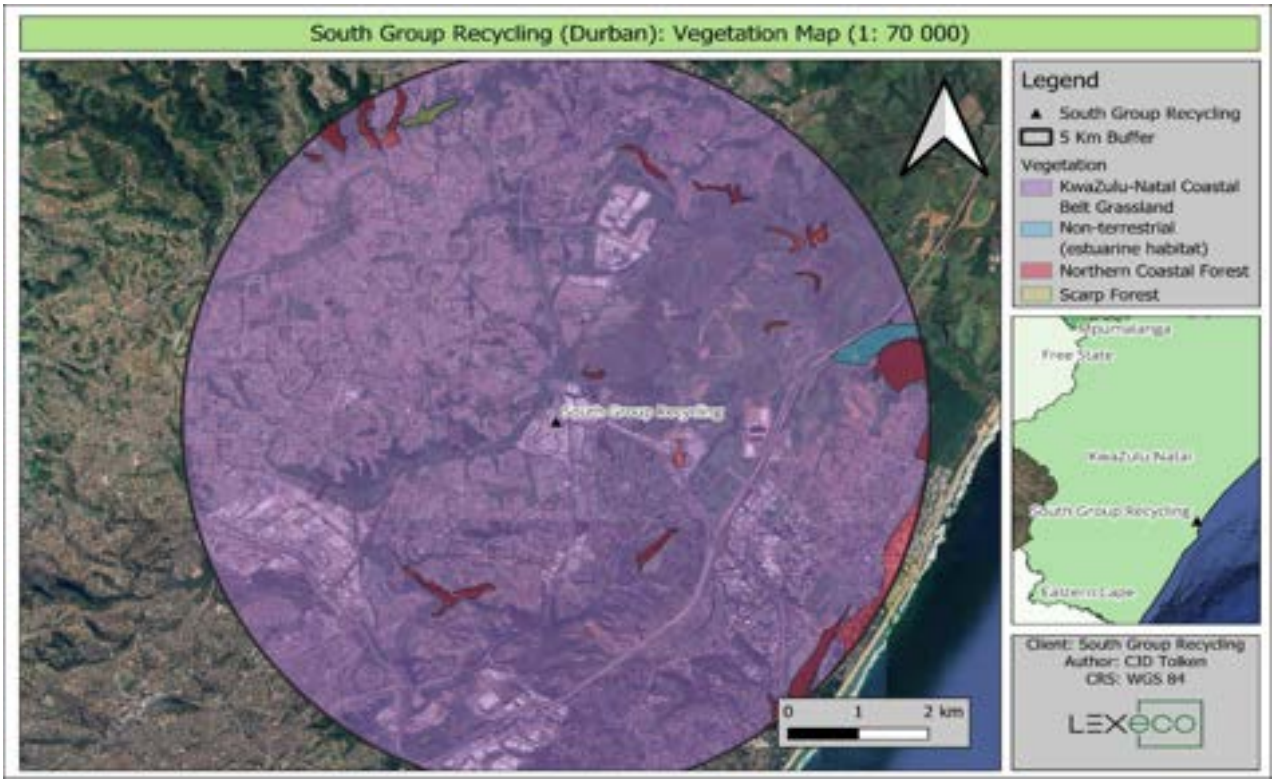

Figure 4: Area Vegetation Map

Monocultural plantations have limited variety in terms of plant species, thus supporting the National Screening Tools "Low" sensitivity.

The proposed project site is also located in an existing warehouse which forms part of an existing and well-established industrial complex. Overall vegetation in the area has been replaced by warehousing structures, concreted surfaces and roads, further limiting the potential for vegetation establishment.

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

3.9. 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.

Geneal biodiversity within and around the Mount Edgecombe, Durban areas is considered to be heavily degraded due to extensive agricultural activities, urbanisation and industrialisation. In the 1900's the area was widely used for the cultivation of sugar cane. With the turn of the century, the land use in the areas shifted more towards residential and or recreational use with the establishment of a golf estate and country club. Little natural vegetation remains, limiting the potential for overall biodiversity.

The South Group, Durban 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 disturbance and land development has led to a low level of biodiversity presence within the study area. The KwaZulu Natal Coastal Beld Grassland Biome is also considered critically endangered and must be protected. 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.

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Annexure H: Site Photos

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Photo 1: SGR, Durban Office Entrance

Photo 2: SGR, Durban Operations Entrance

Photo 3: SGR, Durban View of Operational and Storage Area

Photo 4: SGR, Durban View of Operations and Storage Area

Photo 5: SGR, Durban Sorting and Screening Area

Photo 6: SGR, Durban General Work Station and Scale