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Draft Scoping Report

SGR Holdings (Pty) Ltd

Application for the Expansion of the E-Waste Recycling, Recovery and Treatment Facility Operated by SGR Holdings

Application Ref: Not Yet Available

Report Date: 29 May 2026

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Report Title	Application for the Expansion and Operation of the SGR Holdings (Pty) Ltd E-Waste Recycling, Recovery and Treatment Facility Located within Unit 17 of the Linbro Business Park, Sandton
Report Date	29 May 2026
EAP Details	**LexEco (Pty) Ltd** 11 Alice Lane Building 3, 5th Floor Sandton, Johannesburg 2146 **Contact Person:** Riette Landsberg EAPASA Reg Nr: 2025/20547 Tel: 010 023 8543 Cell : 076 0299 1290 Email: riette@lexeco.co.za
Applicant Details	**SGR Holdings (Pty) Ltd** Unit 17 at 7 Mastiff Road Linbro Business Park Sandton, 2090 **Contact Person:** Wayne Clancy Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@passa.co.za
Application Reference No:	Not Yet Available

EXECUTIVE SUMMARY

➢ Project Description

SGR Holdings (Pty) Ltd ("**SGR Holdings**") operates a small-scale e-waste management facility which specialise in the sourcing printed circuit boards ("**PCBs**"), removed from used cell phones, computers, laptops and other electronics. Once received, the PCBs are manually inspected, screened and sorted by workers who remove unwanted fragments including glass, plastic and wiring that may still be present.

Once sorted and screened, components such as integrated circuit ("**IC**") chips, processors ("**CPUs**") memory chips and connectors are still attached to the circuit boards which cannot be manually removed due to strong bonds and solders that adhere these components to the substrate. SGR Holdings have therefore initiated an experimental trial using scientific ovens and a dismantling machine to effectively separate valuable components from the PCBs.

Screened and sorted PCBs are loaded into one of six (6) scientific ovens and heated to an average of 100°C over a period of 24 hours. The purpose of this step is to weaken adhesive bonds between components on the PCBs which allows for effective separation in the next step of processing. Once cooled, the PCBs are transferred to a dismantling machine which utilises vibrating screens to separate loosened components from the base plate.

Final product, consisting of electronic components, such as chips and mounted parts (often high in precious metal content) and bare or stripped boards are collected, packaged and labelled before being sold to local or international refineries for further processing.

The existing operations, utilise scientific ovens and two (2) chip disassembly machines which, at capacity operate below the 500kg threshold requiring authorisation as set out in terms of GN 921, which would require a Waste Management License.

The experimental trials have proven successful and in turn, SGR Holdings now propose to implement a full-scale e-waste recycling, recovery treatment operation based on the same approach. In order to do so, SGR Holdings propose to install six (6) additional scientific ovens and two (2) chip disassembly machines in addition to one (1) stationary saw and one (1) cylinder saw to assist in the processing of larger fragments. Once operational, the facility will be able to operate at an increased capacity, exceeding 1 ton of e-waste per day. The proposed expansion will allow SGR Holdings to accept a wider range of e-waste, inclusive of IT and telecommunication equipment (cell phones, laptops, computers, printers, routers, and tablets), consumer electronics (televisions, cameras, video and or audio equipment and gaming consoles), household appliances (microwaves, vacuum cleaners, electric kettles, and shavers, refrigerators washing machines dishwashers and electric ovens), tools and electrical toys for processing.

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➢ 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 A of GN 921 states that;

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

In addition, 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.*"

Based on the scope, the proposed expansion and operation of the waste recycling, recovery and treatment activities to be undertaken by SGR Holdings will trigger the following activities listed under Category A and Category B of GN 921:

Table 1: GN 921 Listed Activities Triggered

GN 921 LISTED ACTIVITY	DESCRIPTION
Category A Activity 13	The expansion of a waste management activity listed in Category A or B of this Schedule which does not trigger an additional waste management activity in terms of this Schedule.
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

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GN 921 LISTED ACTIVITY	DESCRIPTION
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

PCBs are known to contain precious metals, with one ton of PCB's often yielding more gold than that of mined gold ore. In addition to gold, trace amounts of precious metals, including Silver, Palladium, Aluminium and Copper are also present in e-waste. Successful processing of PCBs in South Africa is still very much in its infant phase, with majority of e-waste streams being exported for recycling and refining, resulting in the loss of high value metals therewith.

Majority of precious metals available in South Africa continue to be generated by mining activities which in turn result in the destruction of natural and indigenous ecosystems, loss of biodiversity, habitat disturbance and loss of agricultural land. Mining operations also negatively impact cultural heritage resources, air quality and impact surface and ground water quality.

Processing of PCB's and e-waste will not only reduce waste generated but also support the efficient and sustainable recovery of precious metals which on average has been confirmed to bear high economic value. Effective processing of PCB's and associated e-waste produces recovered materials suitable for further processing and refining to recover trace amounts of precious metals. The aim is to develop and implement an efficient and cost-effective alternative which will increase recycling efforts by recovering materials which are suitable for processing in South Africa and not abroad. The overall effort will reduce the amount of raw materials exported to international markets and support manufacturing efforts in South Africa.

In conclusion, processing of PCBs and e-waste results in less negative impact on the receiving environment. Precious metals can be recovered within a smaller area and under more controlled circumstances with less impact on the environment than that of mining. Overall recovery and recycling of PCB's and e-waste is proven to be desirable not only with regards to the economic value associated with the recovered materials but also on a social and economic level as the undertaking provides sustainable jobs and employment opportunities. Smaller scale operations are able to operate within established industrial areas which source their labour force from local surrounding communities. Continued operation is therefore supported.

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➢ Alternatives Considered

The no-go alternative is not supported, as it would result in the loss of sustainable resources and socio-economic benefits. Relocation of the proposed operations to an alternative site will entail disturbance to the established community which relies on the operations for their income and support to their livelihood. Additionally, relocating the operations in its growing phase will place the company under strain due to associated expenses and logistical arrangements.

Use of alternative technologies was also considered but excluded due to high energy needs and intake, functionality, space and layout restrictions and associated costs for establishment and long-term operation.

➢ 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 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

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

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GN R982, APPENDIX 2 CONTENT OF THE SCOPING REPORT		REFERENCE IN REPORT
(2)(h)	A plan of study for the EIA, including:	
(2)(h)	A description of the alternatives to be considered and assessed including the option of not proceeding with the activity	Section 7
(2)(h)(ii)	A description of the aspects to be assessed as part of the environmental impact assessment process	Section 10.1
(2)(h)(iii)	Aspects to be assessed by specialists	Section 11
(2)(h)(iv)	A description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists	Section 11
(2)(h)(v)	A description of the proposed method of assessing duration and significance	Section 9.1
(2)(h)(vi)	An indication of the stages at which the competent authority will be consulted	Section 13.5
(2)(h)(vii)	Particulars of the public participation process that will be conducted during the environmental impact assessment process	Section 13
(2)(h)(viii)	A description of the tasks that will be undertaken as part of the environmental impact assessment process	Section 9
(2)(h)(x)	Identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored	Section 10
(2)(i)	Undertaking under oath or affirmation by the EAP in relation to:	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

SGR Holdings (Pty) Ltd ("**SGR Holdings**") operates a small-scale e-waste management facility which specialise in the sourcing printed circuit boards ("PCBs"), removed from used cell phones, computers, laptops and other electronics. Once received, the PCBs are manually inspected, screened and sorted by workers who remove unwanted fragments including glass, plastic and wiring that may still be present.

Manual processing of PCBs, although cost effective, still results loss of valuable material that require substantial processing before effective refining and recovery efforts can be implemented. In light thereof, SGR Holdings initiated an experimental trial to find a cost effective as well as efficient way of separating different components of e-waste to produce a higher value product, better suited for specialised refining and recovery of precious metals. Experimental trials were therefore undertaken by means of a pilot plant which consist of six (6) scientific ovens and two (2) dismantling machines which are used in sequence to process PCBs.

The existing operations, at capacity processes less than 500kg of e-waste (PCBs) per day, thus falling below the regulated threshold for recycling, recovery and treatment as set out in terms of Category A of GN 921 (as amended). Due to the confirmed success of the experimental trial, SGR Holdings now propose to implement a full-scale e-waste recycling, recovery treatment operation based on the same approach. Additional ovens, dismantling machines and saws will be installed which in turn will increase the existing operations processing capacity to exceed 1 500 kg/day when fully operational. The proposed upgrades will also allow SGR Holdings to accept a wider range of e-waste, inclusive of IT and telecommunication equipment (cell phones, laptops, computers, printers, routers, and tablets), consumer electronics (televisions, cameras, video and or audio equipment and gaming consoles), household appliances (microwaves, vacuum cleaners, electric kettles, and shavers, refrigerators washing machines dishwashers and electric ovens), tools and electrical toys for processing.

All operations will continue to be housed within the existing warehouse (Unit 17) which forms part of the Linbro Business Park, located at 7 Mastiff Road, Sandton. No new development will be required. No extension to the warehouse structure or operational footprint will be required at this time. Any modifications to the floor plan will be internal and will be limited to the construction of a sealed area which will house the cutting equipment (namely the stationary saw and cylinder saw and dust extraction equipment). The warehouse in its current state is deemed sufficient in housing the existing as well as proposed operations after expansion.

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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*."

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 expansion and continued operation of the e-waste recycling, recovery and treatment operations by SGR Holdings will trigger the following activities listed under Category A as well as Category B of GN 921:

Table 2: NEMWA Listed Activities Triggered

GN 921 LISTED ACTIVITY	DESCRIPTION
Category A Activity 13	The expansion of a waste management activity listed in Category A or B of this Schedule which does not trigger an additional waste management activity in terms of this Schedule.
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.

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GN 921 LISTED ACTIVITY	DESCRIPTION
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).

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

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

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

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

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

Listed activities and associated minimum emission standards identified in terms of Section 21 of the National Environmental Management" Air Quality Act, 2004 (Act 39 of 2004) ("**NEMAQA**") were considered, with none being applicable to the proposed waste management activities to be undertaken by SGR Holdings.

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 expansion 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.

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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 will be undertaken. The planned Public Participation process will consist 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 SGR Holdings e-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.

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- Identify key concerns, raised by stakeholders that should be addressed in the subsequent specialist studies.
- Highlight the potential for environmental impacts, whether positive or negative, and
- Inform and provide the public with information and an understanding of the proposed project, issues and solutions.

1.3. Assumptions and Limitations

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

Notwithstanding these assumptions and limitations, it is the view of LexEco and the appointed 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.

2. KEY ROLE PLAYERS

2.1. Details of the Applicant

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

Table 3: Applicant Details

Project Applicant:	***SGR Holdings (Pty) Ltd***
Trading Name:	SGR Holdings (Pty) Ltd
Contact person:	Wayne Clancy
Physical address:	Unit 17, Linbro Business Park, 7 Mastiff Road, Sandton, 2909
Postal address:	Unit 17, Linbro Business Park, 7 Mastiff Road, Sandton, 2909
Telephone:	071 761 7262
E-mail:	wayne@passa.co.za

2.2. Details of the Environmental Assessment Practitioner

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

Appointed EAP:	***Riette Landsberg***
EAPASA Reg Nr:	2025/20457
Tel:	076 0299 1290
Email:	riette@lexeco.co.za
Address:	11 Alice Lane, Building 3, 5th Floor, Sandton, Johannesburg, 2196

2.3. Environmental Assessment Practitioners' Experience

➢ Riette Landsberg

Riette is an experienced environmental consultant who is also registered with the Environmental Assessment Practitioners Association of South Africa (EAPASA) as an Environment Assessment Practitioner (EAP) (2025/20547). Riette holds an Honours Degree in Environmental Sciences (BSc. Hons) which she obtained from the Northwest University in 2013.

With over 12 years of consulting experience, working in the legislative environment, Riette is equipped to successfully translate regulation to industry implementation. Riette has successfully led several EIA's and Basic Assessments and compiled multiple EMPr's and assisted clients with their compliance management needs from application to implementation. Riette is also experienced in undertaking environmental audits for clients in the mining, industrial, commercial and manufacturing sectors and have successfully led and compiled audit reports in terms of Environmental Authorisations (issued under NEMA), Atmospheric Emission Licenses (issued under NEMAQA), Waste Management Licenses and relevant Norms and Standards. Riette's experience in combination with her fields of study have provided her with a sound understanding of the natural environment which she uses in all aspects of her professional career to ensure that an accurate and sustainable approach is applied to all projects.

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

2.4. National Screening Tool Outcomes

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

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

Table 4: National Screening Tool Site Sensitivities

THEME	VERY HIGH SENSITIVITY	HIGH SENSITIVITY	*MEDIUM SENSITIVITY*	*LOW SENSITIVITY*
Agricultural Theme		X		
Animal Species Theme			X	
Aquatic Biodiversity Theme				X
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme		X		
Defense Theme			X	
Plant Species Theme				X
Terrestrial Biodiversity Theme	X			

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

Based on the outcomes of the site verification assessment (**Annexure G**) undertaken by the appointed Environmental Assessment Practitioner, it was determined that no specialist studies will be required in support of this application. The exclusion of recommended specialist studies is based on the existing transformed industrial land use, absence of natural features, and the confinement of all proposed activities to an existing warehouse footprint.

2.4.1. Specialist Studies

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

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

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Table 5: 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	SGR Holdings currently leases an existing warehouse (Unit 17) which forms part of an established industrial complex known as Linbro Business Park at 7 Mastiff Road, Sandton. The warehouse property is zoned for industrial use for which the property is also utilized. The area has been subject to overall development and industrialization, limiting the presence of natural vegetation or undisturbed open space. No agricultural activities or developments are present on or around the application site. The potential for the site or surrounding area to be converted to agricultural use is also considered to be low. No impact on agricultural operations is therefore anticipated. No specialist impact assessments will therefore be undertaken.	Refer to **Figure 10** for an aerial view of the site and surroundings and **Figure 12** for a map indicating relevant surrounding land use. Also refer to **Figure 11** for a map confirming the property zoning Refer to **Annexure G** 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 F**.
Terrestrial Biodiversity Impact Assessment	SGR Holdings currently leases an existing warehouse (Unit 17) which forms part of an established industrial complex known as the Linbro Business Park at 7 Mastiff Road, Sandton. The warehouse property is zoned for industrial use for which the property is also utilized. The area has been subject to overall development and industrialization, limiting the presence of natural vegetation or undisturbed open space.	Refer to **Figure 10** for an aerial view of the site and surroundings and **Figure 12** for a map indicating relevant surrounding land use. Also refer to **Figure 11** for a map confirming the property zoning Also refer to **Annexure G** of this report for site photos showing the extent and status of ongoing industrial activities on site.

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RECOMMENDED SPECIALIST ASSESSMENT	MOTIVATION FOR EXCLUSION OF SPECIALIST STUDY	SUPPORTING EVIDENCE
Plant Species Assessment	The existing warehouse will continue to be used in its current state. The proposed upgrading and modification of the operations will be focused within the bounds of the warehouse already used by SGR Holdings and will not require any extension of the warehouse or enlargement of the operational footprint at this time. 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. Limited 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.	A full copy of the site verification report is also attached to this report under **Annexure F**.
Animal Species Assessment		

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RECOMMENDED SPECIALIST ASSESSMENT	MOTIVATION FOR EXCLUSION OF SPECIALIST STUDY	SUPPORTING EVIDENCE
Archaeological and Cultural Heritage Impact Assessment	The proposed expansion and operation of waste management activities will not have any impact on the region's archaeological or cultural heritage resources. The proposed construction and expansion of the existing operations will be limited to the establishment and operation of additional equipment which in turn will increase the facility processing capacity. No extension or alteration to the existing warehouse or operational footprint will be required. All equipment as well as operations will be limited to the bounds of the warehouse.	The application site is located within the Linbro Business Park, Sandton, which is an established industrially zoned area. According to the South African Heritage and Resource Information System ("SAHRIS") (https://sahris.org.za/nhsmap), the application site and or local surrounds does not include any registered heritage, archaeological or paleontological sites within a 5 km radius. Refer to **Annexure F (Site Verification Report)** of this report.
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 construction, expansion and operation of the waste management operations will not have any impact 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.	Refer to **Figure 10** for an aerial view of the site and surroundings and **Figure 12** for a map indicating relevant surrounding land use. Also refer to **Annexure G** 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 F**.
Hydrology Assessment	The proposed expansion and operation of the waste management facility will be limited to the boundaries of the existing warehouse located on concreted surfaces which form part of an existing industrial area. No construction, earthworks, site clearing, or	Refer to **Annexure G** for site photos showing the current status of the site and **Annexure G** for a full copy of the site verification report. Refer to Annexure **B** for copy of the site plan.

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RECOMMENDED SPECIALIST ASSESSMENT	MOTIVATION FOR EXCLUSION OF SPECIALIST STUDY	SUPPORTING EVIDENCE
	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 are equipped with an existing, engineered stormwater drainage system that is designed to manage runoff from the developed site. Stormwater is conveyed via formal infrastructure to the municipal/industrial stormwater network. No modifications to the stormwater system will be required. No natural hydrological features such as rivers, wetlands, floodplains, or drainage lines are present on site or within direct vicinity to the warehouse and industrial property. The proposed site as well as local receiving environment is therefore not considered hydrologically sensitive. No impact on the areas hydrological status is 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. 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. No specialist assessment in terms of Noise will be undertaken.	Refer to **Annexure G** of this report for site photos showing the extent and status of current industrial operations and **Figure 11** 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 & Socio-Economic Assessment	The expansion and operation of the waste management activities will be restricted to an existing warehouse which forms part of an established industrial area. The scale of the operation in relation to the area is, however, considered to be small. Although sustainable employment, skill development and potentially new employment opportunities may be generated, the overall impact, even if positive, is anticipated to be low. No Socio-Economic Impact Assessment will therefore be undertaken.	No specialist assessments in terms of health and or socio-economic impacts will be undertaken.
Ambient Air Quality Impact Assessment	All expansion and operational activities will be located 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.	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 expansion and continued operation of the SGR Holdings e-waste processing operations will be located within an existing warehouse which forms part of an established industrial area. Little to no natural vegetation remains as surface areas have been paved and concreted in support to the industrial land use. No alteration or expansion to the existing warehouse (Unit 17) will be undertaken. The proposed expansion will entail the establishment of additional equipment such as six (6) additional scientific ovens, two (2) dismantling machines and a stationary saw and cylinder saw which in turn will increase the existing facility's operational capacity to exceed 1 500 kg of e-waste per day.

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

SGR Holdings currently operate from Unit 17 of the Linbro Business Park, located at 7 Mastiff Road, Sandton in the Gauteng Province and within the jurisdiction of the City of Johannesburg Metropolitan Municipality.

Physical Address:	**Unit 17 in the Linbro Business Park at 7 Mastiff Road, Sandton, 2909**
Property Name(s):	Erf 11 and 12 Longlake Extension 1, 7 Mastiff Street, Linbro Business Park, Linbro Sandton, 2909

3.2. Property Zoning

The site is zoned as Industrial 1 which is in line with the existing industrial operations undertaken by SGR Holdings. The surrounding land use is also industrial in nature.

3.3. Surveyor General Code

T	0	I	R	1	0	0	0	0	0	0	0	0	0	9	3	0	0	0	0	0

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3.4. Site Location

The area surrounding operation comprises of many warehouses as well as a combination of light to medium industrial activities.

SGR Holdings (Pty) Ltd lease and operate from an existing warehouse, namely Unit 17 within the Linbro Business Park located at 7 Mastiff Road, Linbro, Sandton within the Gauteng Province.

The site and existing operations fall within the jurisdiction of the City of Johannesburg Metropolitan Municipality and can be accessed via the N3 National Toll Route, taking exit 124 Sandton along the M60 towards Marlboro Drive. Using Starfield Drive, 3rd Road or Milkyway Avenue, access to Mastiff Road is gained, which leads directly to the Linbro Business park and Unit 17 which houses the SGR Holdings operations.

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

Table 6: Site Coordinates

CORNER	LATITUDE	LONGITUDE
A	26° 3'42.41"S	28° 6'57.64"E
B	26° 3'42.88"S	28° 6'57.99"E
C	26° 3'42.14"S	28° 6'59.40"E
D	26° 3'41.62"S	28° 6'59.06"E

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Figure 1: SGR Holdings Locality Map

4. PROCESS DESCRIPTION

PCBs, removed from used cell phones, computers, laptops and other electronics are sourced from local manufacturers and traders and transported to the SGR Holdings facility located In Unit 17 of the Linbro Business Park for processing. Once received, the PCBs are manually inspected, screened and sorted by workers who remove unwanted fragments including glass, plastic and wiring that may still be present.

Once sorted and screened, components such as IC chips, processors, memory chips and connectors are still attached to the circuit boards which cannot be manually removed due to strong bonds and solders that adhere these components to the substrate. SGR Holdings have therefore initiated an experimental trial using scientific ovens and a dismantling machine to effectively separate valuable components from the PCBs.

Screened and sorted PCBs are loaded into one of six (6) scientific ovens and heated to an average of 100°C over a period of 24 hours. The purpose of this step is to weaken adhesive bonds between components on the PCBs which allows for effective separation in the next step of processing. Once cooled, the PCBs are transferred to a dismantling machine which utilises vibrating screens to separate loosened components from the base plate.

Final product, consisting of electronic components, such as chips and mounted parts (often high in precious metal content) and bare or stripped boards are collected, packaged and labelled before being sold to local or international refineries for further processing.

The existing operations, at capacity processes less than 500kg of e-waste (PCBs) per day, thus falling below the regulated threshold for recycling, recovery and treatment as set out in terms of Category A of GN 921 (as amended).

The experimental trials have proven successful and in turn, SGR Holdings now propose to implement a full-scale e-waste recycling, recovery treatment operation based on the same approach and process flow. In order to do so, SGR Holdings propose to install six (6) additional scientific ovens and two (2) chip disassembly machines a stationary saw and a cylinder saw which will be used to increase the facility's capacity and processing volumes to more than 1 500 ton of e-waste per day. The proposed expansion will allow SGR Holdings to accept a wider range of e-waste, inclusive of IT and telecommunication equipment (cell phones, laptops, computers, printers, routers, and tablets), consumer electronics (televisions, cameras, video and or audio equipment and gaming consoles), household appliances (microwaves, vacuum cleaners, electric kettles, and shavers, refrigerators washing machines dishwashers and electric ovens), tools and electrical toys for processing.

The proposed operation will be housed within the existing warehouse, namely Unit 17, currently leased by SGR Holdings. No alteration to the warehouse or operational footprint will be required. The proposed construction and expansion activities will be limited to the establishment and operation of the additional equipment which will increase SGR Holdings operational capacity.

4.1. Existing Infrastructure Associated with the Site

➢ *Roads*

Access to the facility is gained via Mastiff Road which links up to Starfield Drive, 3rd Road or Milkyway Avenue which merges with Marlboro Drive and the N3 National Toll Route. The M1 Metropolitan route also links up with the N1 National toll route to the northeast of the site.

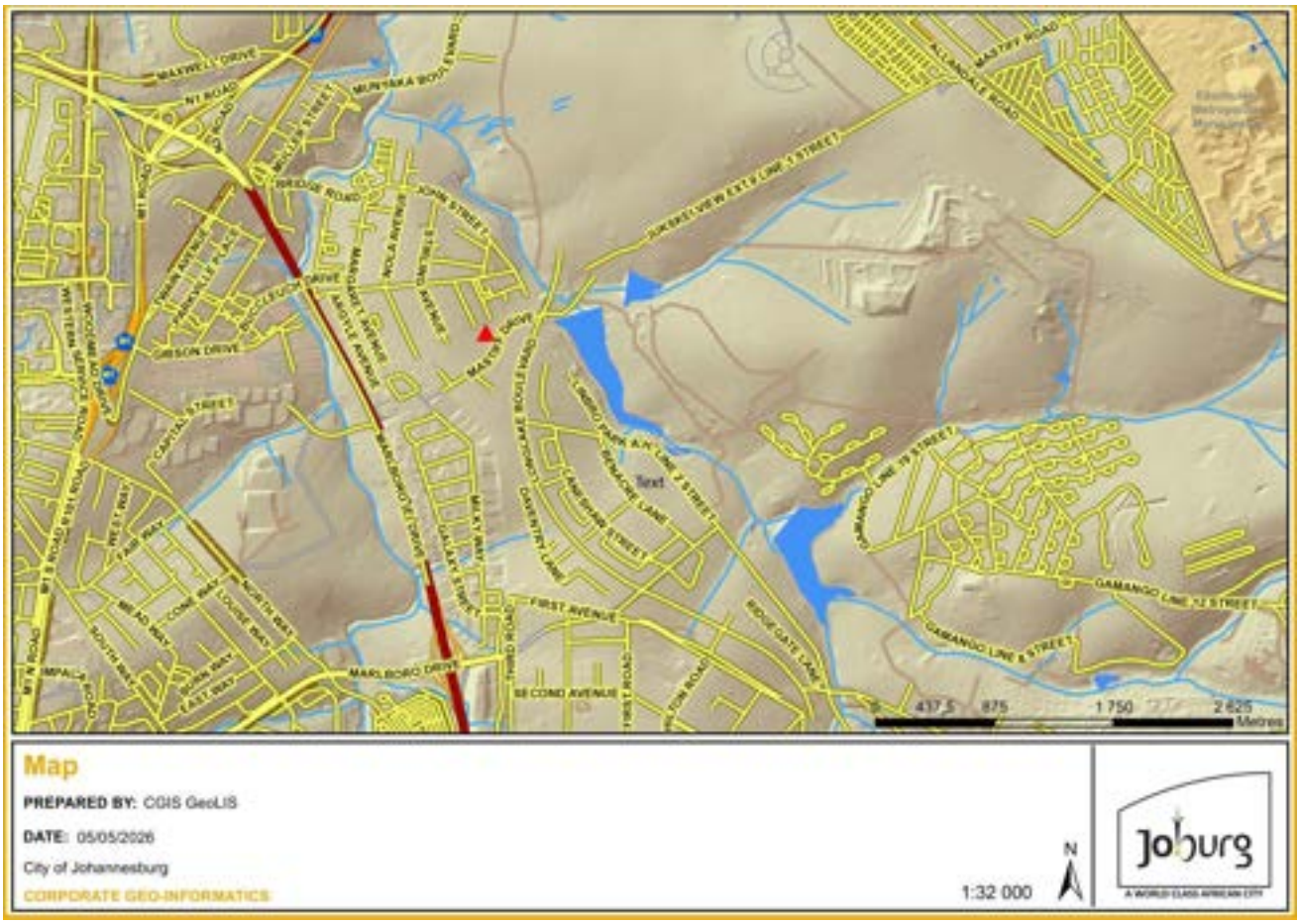

Figure 2: SGR Holdings Route and Location

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- ***Security***

SGR Holdings operate form within an existing warehouse, located in an established industrial complex which is fenced and manned by security personnel at the main entrance. The warehouse is also individually fenced with its own access gate, restricting unauthorised access.

- ***Access Gates***

Access to the SGR Holdings can only be gained via the access gate on Mastiff Road which is manned by security personnel. The warehouse itself is also fenced and equipped with its own gate to restrict unauthorised entry.

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

- ***Existing Infrastructure***

SGR Holdings operate from within an existing warehouse, referred to as Unit 17 which forms part of the Linbro Business Park at 7 Mastiff Road, Sandton.

The warehouse, leased by SGR Holdings is equipped with FM2 concrete flooring and exterior paving providing a sustainable surface to support ongoing industrial operations. The inside of the warehouse is mainly open concept with areas dedicated to specific activities such as manual sorting and picking, packaging and storage. Ablution facilities and a recreational or canteen area is also cordoned off, away from the operational areas. Employees make use of dedicated workstations where manual picking and sorting of e-waste is undertaken.

Six (6) scientific ovens are installed along with two dismantling machines which are used to process e-waste.

- ***Storm Water Management***

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

- ***Electricity***

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

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- ***Water Supply and Use***

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

- ***Waste Management***

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

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

General waste streams which cannot be recycled or processed by SGR Holdings such as residual glass, plastic and packaging waste will be collected in designated bins or skips and diverted to local recyclers for processing where possible or collected by authorized service providers for safe disposal at licensed landfill sites.

5. LEGISLATIVE CONTEXT

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

- **Section 24 – Environment**

"*Everyone has the right -*

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

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

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

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

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- **Section 2: Environmental Management Principles**

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

- **Section 24: Prohibitions Relating to Commencement of Constitution of Listed Activity**

No person may commence with an activity listed or specified in terms of Section 24(2)(a) unless the competent authority or the Minister or Minerals and Energy, as the case may be, has granted an environmental authorisation for the activity. An activity may only commence and continue of the said activity listed in terms of Section 2A(2)(d) if the activity is undertaken in terms of an applicable norm and standard.

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

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

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

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

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

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

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

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

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

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

2. **Listing Notice 2** (Government Notice R. 984 in Government Gazette 38282 of 4 December 2014) which sets out the activities that require both a Scoping and Environmental Impact Assessment Report. Typically, these are large scale or highly polluting activities, and the full range of potential impacts must be established through a scoping exercise before the activity begins.

3. **Listing Notice 3** (Government Notice R. 985 in Government Gazette 38282 of 4 December 2014) which identifies activities that will only require an environmental authorisation through a basic assessment process if the activity is one of the specified geographical areas indicated in the listing notice.

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

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

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

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

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

- Agricultural Theme – *High*
- Animal Species Theme – *Medium*

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- Aquatic Biodiversity Theme – *Low*
- Archaeological and Cultural Heritage Theme – *Low*
- Civil Aviation Theme – *High*
- Defence 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 **Section 8.7** of this report for a full discussion and outcomes based on the site verification.

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

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

5.4.1. National Waste Information Regulations (13 August 2012)

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

SGR Holdings will apply for registration on the Gauteng Waste Information System ("**GWIS**") 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*."

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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 existing operations, at capacity processes less than 500kg of e-waste (PCBs) per day, thus falling below the regulated threshold for recycling, recovery and treatment as set out in terms of Category A of GN 921 (as amended). SHR holdings now propose to expand their operation by installing additional equipment to facilitate a full-scale operation which in turn will allow them to accept not only PCBs but also all ranges of e-waste for processing. Installation of additional equipment inclusive of six (6) additional scientific ovens, two (2) dismantling machines and a stationary saw and a cylinder saw which will result in an increased operational throughput, i.e., operational capacity, this triggering the definition of expansion as set out in terms of NEMWA and GN 921.

➢ Listed Activities Triggered

The proposed expansion and operation of waste recycling, recovery and treatment activities to be undertaken by SGR Holdings will trigger the following activities listed under Category B of GN 921:

Table 7: NEMWA Listed Activities Triggered

GN 921 LISTED ACTIVITY	DESCRIPTION
Category A Activity 13	The expansion of a waste management activity listed in Category A or B of this Schedule which does not trigger an additional waste management activity in terms of this Schedule.
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).

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SGR Holdings 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*."

Recycling or Recovery of Waste

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

An application for the registration of the SGR Holdings 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. Draft National Policy for the Management of Waste Electrical and Electronic Equipment (GNR 4983, 2024)

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

SGR Holdings will operate within the requirements of the draft framework.

5.4.5. 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 SGR Holdings operations are considered to be in support of the waste hierarchy and National Waste Management Strategy for South Africa. Continued operation of SGR Holdings 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 proposed expansion and continued operation of SGR Holdings was assessed in terms GN 893, (Listed Activities and Associated Minimum Emission Standards Identified in terms of Section 21 of NEMAQA), and 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 during the EIR phase of this application.

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

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

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

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

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

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

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

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

- Section 21 (a) Taking water from a water resource.
- Section 21 (c) Impeding or diverting the flow of water in a watercourse.
- Section 21 (g) Disposing of waste in a manner which may detrimentally impact on a water resource.
- Section 21 (i) Altering the bed, banks, course or characteristics of a watercourse.
- Section 21 (f) discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit.

The proposed expansion and continued operations of SGR Holdings do not trigger any water uses in terms of the NWA.

The proposed expansion and continued operation of SGR Holdings and the associated waste management activities was assessed, and in conclusion it was determined that no water use activities requiring authorisation will be triggered.

The proposed expansion as well as continued operation will not require any water intake or generate effluent. Water use for domestic purposes will rely on existing municipal supplies.

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

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

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

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- 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 shows that the site occupied by SGR Holdings is of low sensitivity in terms of heritage and cultural importance. The SGR Holdings operations are currently housed within an existing warehouse which will continue to be used for the proposed waste management activities applied for. The proposed expansion will entail the installation and operation of additional equipment which in turn will increase the facility's operational capacity. The warehouse currently leased is considered sufficient in housing the proposed expansion as well as planned operations. No extension, alteration or modification to the warehouse structure or its footprint will be required.

Should this application be approved, the undertaking of the proposed wate management activities will not have any impact on localised heritage resources.

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

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

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The DFFE Screening Tool Report identified Civil Aviation as having high sensitivity for the Project. The SGR Holdings facility is located 8.26 km southwest from Grand Central Airport and 15.68 km northwest from OR Tambo International Airport.

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

5.10. City of Johannesburg Municipality 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 Johannesburg IDP supports the city's 2040 mission to pro-actively develop and create a city environment that is resilient and sustainable and improves the quality of life, has an inclusive, job-intensive, resilient and smart economy to build an inclusive community. The city's priorities include the creation of job opportunities and sustained economic growth. The proposed expansion and continued operation of the SGR Holdings operations will provide job security to already employed personnel as well as potentially generate new job opportunities. The proposed expansion and continued operation of SGR Holdings, therefore, aligns with the city's objectives and therefore, supports these priorities.

5.11. City of Johannesburg Spatial Development plan

The Spatial Development Framework (SDF) for Johannesburg 2040 is a city-wide spatial policy document that identifies the main challenges and opportunities in the city, sets a spatial vision for the future city, and outlines a set of strategies to achieve that vision.

The City of Johannesburg is committed to reducing spatial inequality, promoting economic growth and development through the establishment of a conducive environment for business investment. The city has implemented several measures to create an environment that supports businesses, such as investing in infrastructure and adopting policies to attract investment. The city also prioritizes job creation and economic transformation, which is evident in the 11 mayoral priorities. The priorities focus on creating jobs, improving service delivery, and transforming the economy to be more inclusive and sustainable. The 2040 SDF makes use of a transect approach to development zones to promote high intensity, mixed use development in well located, walkable parts of the city with good access to public transit, and lower intensity urban form moving away from the centre.

The continued use of Unit 17 warehouse which forms part of the Linbro business park for the proposed expansion and continued operation of the SGR Holdings e-waste management facility is ideally located in

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terms of the City of Johannesburg's Spatial Development Framework as it is situated within a designated and well-established industrial node which benefits from existing infrastructure and strategic transport connectivity, and is close to an economic centre. The development supports efficient land use, minimises environmental and social conflict, and contributes to circular economy objectives, thereby representing a spatially appropriate land use.

6. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES

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

6.1. PCBs and Electronic Waste Recovery, Recycling and Treatment

Printed Circuit Boards, or PCBs are laminated sandwich structures of conductive and insulating layers used in nearly all electronic products today. On average approximately 380 000 tons of e-waste is generated in South Africa per year, with only 7-12% recycled. The excess e-waste, although banned, still ends up at landfill or may be subject to unregulated processing. Improperly discarded PCBs (e-waste) can release up to 1.5 grams of lead per unit into the environment Improper processing of PCBs (e-waste) may also lead to the release of toxic materials which easily accumulate in ecosystems, moving up the food chain which lead to long-term hazards to wildlife and human health.

On a broader scale, PCBs, on average contain high amounts of precious metals, with one (1) ton of PCB's often yielding more gold than one (1) ton of mined gold ore. In addition to gold, trace amounts of precious metals, including Silver, Palladium, Aluminium and Copper are also present in e-waste. Successful processing of PCBs in South Africa is still very much in its infant phase, with majority of e-waste streams being exported for recycling and refining, resulting in the loss of valuable materials therewith.

Majority of precious metals available in South Africa continue to be generated by mining activities which in turn result in the destruction of natural and indigenous ecosystems, loss of biodiversity, habitat disturbance and loss of agricultural land. Mining operations also negatively impact cultural heritage resources, air quality and impact surface and ground water quality.

The need for regulated and controlled recycling, recovery and treatment of PCBs (e-waste) in South Africa has reached critical levels, as e-waste generation continues to increase due to higher demand for electronics in combination with short term use.

In light of the need, SGR Holdings have initiated a pilot operation as a trial to develop a streamlined process which would be sustainable as well as economical in the effort to manage e-waste generated in South Africa.

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Processing of PCB's and e-waste will support overall efforts to divert waste from landfill as well as support the efficient and sustainable recovery of precious metals which bear economic value. Successful recovery of precious metals will reduce the need for mined minerals. In addition to the recovery of precious metals, alternative materials such as plastic and glass can also be recovered and recycled, supporting alternative recycling efforts as well as generating sustainable employment opportunities in the local communities.

It's a collective responsibility to ensure that e-waste and PCBs are manged appropriately. Companies like SGR Holdings are leading the way in this vital endeavour, offering not only a service but also developing a sustainable and effective process for the recycling, recovery and treatment of w-waste and PCBs which support better recovery of precious metals by refineries and processors down the line. Approval of the expansion and continued operations of SGR Holdings will not only provide a sustainable alternative to e-waste management but also support the development and growth of the e-waste recycling industry as new technology can be introduced once processes have successfully been tested and streamlined.

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Table 8: Need and Desirability Considerations

QUESTION	ANSWER
SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES	
1. How will this development (and its separate elements/aspects) impact on the ecological integrity of the area)? 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 1.1.3. Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs") 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.)	SGR Holdings operate from within an existing warehouse (Unit 17), which forms part of a larger industrial complex, namely the Linbro Business Park. Surrounding land use consists of a mixture between light to medium industrial operations, dominated by warehousing structures owned and rented by logistics and manufacturing companies. Although Unit 17 of the Linbro Business Park is located within an Ecologicla Support Area (ESA), the integrity thereof has been completely deteriorated. Decades of urbanization and industrialization in the area have led to a decline in ecological integrity which was also confirmed by a site visit. Continued use of the industrial space (Unit 17), already utilized by SGR Holdings, will not result in any negative impact. In contrast, the continued use of existing industrial space (namely Unit 17) will limit the need for alternative development which will most probably encroach into the surrounding ESA which should otherwise be protected, supporting overall conservation targets. The Linbro Business Park was initially constructed in and between the 1990's and early 2000's and was strategically located just off the N3 freeway in order to provide sufficient access to Sandton, Midrand, Pretoria and the East Rand via the N1 and N3 toll routes. Additionally, the industrial complex's proximity to the Gautrain Station, a mere 2 kilometres away makes it a prime choice for logistical reasons. The industrial complex was carefully planned and developed in support to the visions and objectives of the City of Johannesburg's Spatial Development Framework. The proposed e-waste recycling, recovery and treatment activities to be undertaken by SGR Holdings will result in limited impacts on the surrounding 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	As part of the scoping process in support of the WML application, a preliminary screening and site verification process was undertaken to confirm the current land use and ecological status of the project site.

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QUESTION	ANSWER
explored to minimize and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The existing e-waste operations are small in scale and fall below the regulated threshold, triggering the need for a WML. SGR Holdings now propose to expand their existing operation by installing additional equipment such as scientific ovens, dismantling machines, a stationary saw and a cylinder saw which will allow the facility to process higher volumes of PCBs whilst also allowing the facility to accept a wider range of e-waste materials for processing. Continued use of an existing facility avoids the need for alternative development. Operations will be localized to an industrially zoned site, limiting and avoiding potential impacts on surrounding ecosystems and overall biodiversity in the area. The proposed expansion of the SGR Holdings operations is unlikely to result in direct loss of natural habitat or significant biodiversity decline. As part of the preliminary screening process potential risks were identified which in turn will be assessed as part of the Environmental Impact phase. A standard approach as set out under Section 9 & 10 of this report will be applied in order to assess identified risks and impacts. Based on the outcome appropriate engineering, operational and administrative controls will be recommended and incorporated into the EMPr which will be drafted as part of the EIR phase.
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 minimize and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	
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 minimize, 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 operations, low amounts of waste are anticipated to be generated. All waste generated from the site office, inclusive of paper, food packaging and plastic will be collected by municipal services for landfill disposal on a regular basis. General waste streams which cannot be recycled or processed by SGR Holdings such as residual glass, plastic and packaging waste will be collected in designated bins or skips and diverted to local recyclers for processing where possible or collected by authorized service providers for safe disposal at licensed landfill sites.
1.5. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage?	The proposed expansion and operation of an e-waste recycling, recovery and treatment facility within an existing warehouse in Linbro Business Park is unlikely to

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QUESTION	ANSWER
What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimize and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	significantly disturb landscapes or sites of cultural heritage, given its location in a fully developed industrial area. The site is situated within an established industrial park and is not known to contain formal heritage resources such as archaeological sites, historical buildings, graves, or culturally significant landscapes. As no new greenfield development or excavation is anticipated, the likelihood of disturbing subsurface archaeological materials is very low. Given the industrial setting and use of an existing warehouse, the proposed expansion of the SGR Holdings waste management facility is not expected to result in the loss or degradation of cultural heritage resources or significant landscapes. Impacts are largely limited to minor visual considerations, which can be effectively managed by means of housekeeping. With appropriate controls in place, the project may even enhance the local industrial landscape and contribute indirectly to the protection of culturally important environments beyond the site.
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 minimize and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The expansion and operation of the SGR Holdings operations within an existing warehouse (Unit 17) in Linbro Business Park will have a generally positive impact on non-renewable natural resources, with only limited direct consumption associated with its operation. While the facility will consume some non-renewable resources (mainly electricity and fuel), its primary function is to recover and conserve scarce materials which will be recovered from waste, significantly reducing the need for virgin resource extraction by means of mining. As a result, the development is expected to have a positive impact on non-renewable natural resources, supporting long-term resource sustainability.

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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 jeopardize 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 minimize 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? 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?	Appropriate control measures will be recommended and included in the facility's EMPr which will be drafted as part of the EIR phase of this application.

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QUESTION	ANSWER
1.8. How was a risk-averse and cautious approach to be applied in terms of ecological impacts? 1.8.1. What are the limits of current knowledge (**Note**: *the gaps, uncertainties and assumptions must be clearly stated)?* 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?	By undertaking the scoping process, a preliminary assessment was undertaken with the aim of identifying potential impacts associated with the proposed scope of the project. 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.
1.9. How will the ecological impacts result from this development impact on people's environmental rights in terms of the following: 1.9.1. Negative impacts: e.g., access to resources, opportunity costs, loss of amenity (e.g., open space), impacts of air and water quality, nuisance (noise, odor, 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? 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?	Given the location of the existing operations within an established industrial area (Linbro Business Park), impacts on surrounding communities are expected to be low and largely manageable, provided appropriate controls are implemented. A full impact assessment, as set out under Section 9 & 10 of this report will be undertaken as part of the EIA phase in support to this application. All impacts identified, inclusive of air quality, noise and potential water or soil pollution will be assessed. Based on the outcome of the impact assessment, relevant mitigation measures will be recommended and included in the EMPr which will be drafted as part of the EIR phase for implementation once approved. Engineering controls, designs and location alternatives will also be assessed and the best suited option recommended for implementation. With the implementation of appropriate mitigation and management measures, the facility is expected to uphold environmental rights, ensuring that surrounding users are not exposed to conditions harmful to their health or well-being, while also delivering broader environmental benefits through responsible e-waste recycling.

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QUESTION	ANSWER
1.10. Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socioeconomic impacts (e.g., on livelihoods, loss of heritage sites, opportunity costs, etc.)?	SGR Holdings currently operate from within an established warehouse (Unit 17) which forms part of an industrial complex which was designed and built to support light to moderate industrial operations. The proposed expansion of the SGR Holdings operations will be limited to the installation of additional equipment which, in turn, will increase the existing operations processing capacity. No alteration, modification or extension to the warehouse will be required, avoiding large scale development which would result in higher risk impacts on the natural environmental and surrounding community and heritage resources. The warehouse and associated industrial complex is considered to be in line with the objectives of the City of Johannesburg's Spatial Development Framework. The industrial setting is considered the best suited option for the proposed expansion and continued operation of the SGR Holdings facility as existing infrastructure is equipped to support ongoing operations whilst also limiting visual impacts on the surrounding community. The proposed operations, if approved will support waste reduction efforts by providing a regulated alternative to landfill disposal or illegal processing of e-waste which in turn has a negative impact on the environment.
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 will be housed within an existing warehouse. If approved, the operations of SGR Holdings will support overall waste reduction efforts which in turn will also lead to a reduced risk of environmental pollution due to e-waste ending up at landfill or being subject to illegal processing. Sustainable recycling, recovery and treatment of e-waste promotes the recovery of precious metals and recyclable material which can be used to produce new products. A complete assessment of impacts associated with the proposed project will be undertaken in the EIA phase and mitigation set out in the EMP.

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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 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, and 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? 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").	SGR Holdings operate from within an existing warehouse (Unit 17), which forms part of a larger industrial complex, namely the Linbro Business Park. Surrounding land use consists of a mixture between light to medium industrial operations, dominated by warehousing structures owned and rented by logistics and manufacturing companies. The Johannesburg IDP supports the city's 2040 mission to pro-actively develop and create a city environment that is resilient and sustainable and improves the quality of life, has an inclusive, job-intensive, resilient and smart economy to build an inclusive community. The city's priorities include the creation of job opportunities and sustained economic growth. The proposed expansion of SGR Holdings is therefore aligned with these priorities. The City of Johannesburg is committed to reducing spatial inequality, promoting economic growth and development through the establishment of a conducive environment for business investment. The city has implemented several measures to create an environment that supports businesses, such as investing in infrastructure and adopting policies to attract investment. The city also prioritizes job creation and economic transformation, which is evident in the 11 mayoral priorities. The priorities focus on creating jobs, improving service delivery, and transforming the economy to be more inclusive and sustainable. The 2040 SDF makes use of a transect approach to development zones to promote high intensity,

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QUESTION	ANSWER
	mixed use development in well located, walkable parts of the city with good access to public transit, and lower intensity urban form moving away from the centre. The proposed expansion and operation of the SGR Holdings e-waste facility, therefore, supports the SDF, in terms of its location and the activity occurring on site.
2.2. Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area? 2.2.1. Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	The proposed expansion and continued operation of SGR Holdings benefit the surrounding community, both directly and indirectly by providing employment opportunities during the operational phase. Expansion of the existing operations will also allow the facility to accept higher volumes of PCBs as well as all ranges of e-waste for processing, therefore diverting waste away from local landfills and potentially reducing the risk of illegal dumping. 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.
2.3. How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?	The local community will benefit directly from the proposed project on a social and economic scale through employment opportunities and skill development. Limited cultural or heritage impacts are anticipated as the project is proposed to be located within an existing warehouse in an industrially zoned area. Operations will therefore not encroach into local communities or impact on the visual aesthetic of the surrounding areas. A formal public participation process will be undertaken as part of the scoping phase as well as during the EIA phase. Relevant IAPs will be informed of 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 of the location and proposed scope of the project.

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QUESTION	ANSWER
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 9 of this report. Based on the outcomes of the scoping phase, relevant mitigation measures were assigned to identify 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 – 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 enabled non-motorized and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms of public transport), 2.5.4. compliment other uses in the area, 2.5.5. be in line with the planning for the area, 2.5.6. for urban related development, make use of underutilized land available with the urban edge, 2.5.7. optimize 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	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. A full assessment of the impacts will be undertaken and included in the EIA phase. A comprehensive public participation process will 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.

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QUESTION	ANSWER
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 favor 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 was a risk-averse and cautious approach applied in terms of socio-economic impacts? 2.6.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)? 2.6.2. What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge? 2.6.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	The expected impacts have been 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.

QUESTION	ANSWER
2.7. How will the socio-economic impacts result from this development and impact on people's environmental rights in terms following: 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 minimize, manage and remedy negative impacts? 2.7.2. Positive impacts. What measures were taken to enhance positive impacts?	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, an EMP will be developed, setting out appropriate mitigation of 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 utilization of natural resources, etc.)?	Authorization of the 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 install the required equipment at their existing operations and to optimally utilize available space for the planned waste management activities, avoiding the need for additional land development. The streamlined operation will require less energy input than that of a larger scale operation. The recycling, recovery and treatment activities directly support the objectives set out by the Waste Hierarchy which reduces the need for waste disposal to land. Additionally, 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 will reduce or potentially avoid the risk of impacts on humans as well as the community. After implementation, it is anticipated that the operations of SGR Holdings 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 (Unit 17), already operated by SGR Holdings, was the best suited option. By focusing on 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 centers, 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 preliminary 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

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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?	full assessment will be included in the EIA phase and outcomes addressed in the EMPr.
2.13. What measures were taken to: 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 recognized and their full participation therein were be promoted?	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
2.14. 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.

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?	SGR Holdings 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 by the policies and framework as specified. A training and awareness program 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: 2.16.1. the number of temporaries versus permanent jobs that will be created, 2.16.2. whether the labor 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 laborers 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.).	SGR Holdings operate from within an existing warehouse (Unit 17) which forms part of a larger established industrial complex, namely the Linbro Business Park. Established access routes inclusive of Mastiff Road and Mily Way Avenue link up to the N3 and N1, providing easy access to and from the facility. If this application is approved, SGR Holdings will be able to continue operations on a more sustainable level which in turn provides more job security for 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 SGR Holdings 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.

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QUESTION	ANSWER
2.17. What measures were taken to ensure: 2.17.1. that there were intergovernmental coordination and harmonization of policies, legislation and actions relating to the environment, and 2.17.2. that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?	SGR Holdings 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 legislation and regulations were also considered and are included in a summarized discussion under Section 5 of this report. 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. All relevant authorities, including 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 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.

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QUESTION	ANSWER
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 minimizing further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?	The ongoing operation of SGR Holdings as well as the proposed expansion of the facility aligns with the objectives of the National Waste Hierarchy by preventing unnecessary disposal of high-risk wase (such as e-waste) to land. By recovering, recycling and treating the waste, the potential contamination of natural resources, leading to human and animal health impacts, is avoided. In addition, the recycling, recovery and treatment activities will generate high quality materials which can sustainably be provided to alternative industries for the production high value products and materials. 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.
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 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 SGR Holdings operations.

7.1. No-Go Alternative

The no-go option is considered the least favourable option in terms of the alternatives considered.

In terms of the no-go alternative, SGR Holdings will continue with their existing operations in its current state. No expansion will therefore be implemented, meaning no installation or establishment of additional equipment, upgrading of infrastructure or acceptance of additional e-waste streams other than PCBs will be facilitated.

By limiting operation, SGR Holdings will not be able to expand their operational scope. This alternative will avoid potentially positive as well as negative impacts on the environment and the status quo of the area would remain unchanged.

E-waste which would have been subject to recycling, recovery and treatment will more likely now be diverted to landfill or end up at facilities which cannot effectively process the waste, resulting in valuable material being lost or exported to external countries.

The implications of the no-go option will be evaluated as part of the EIA phase of the Project.

7.2. Alternative Locations

SGR Holdings currently lease and operate from within an existing warehouse (Unit 17) which forms part of the Linbro Business Park. The unit in its current state has sufficient space to accommodate the proposed expansion and continued operations of SGR Holdings. Relocation of the existing operations is not considered feasible as the undertaking will require substantial financial inputs and result in a temporary halt in operations, leading to income losses.

Relocation of the operations is not considered a feasible option and was therefore not further considered in terms of this application.

The Table below contains an evaluation of the existing site, as the proposed location for the planned expansion and continued operations of SGR Holdings, if approved.

Table 9: 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	

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

SGR Holdings operates a small-scale e-waste (PCB) management facility which was established as a pilot facility aimed at assessing and testing e-waste processing methods to produce high quality materials that meet industry standard for further refining and recovery of precious metals. With the ongoing success of the methods currently used, SGR Holdings now propose to expand on the operations by installing additional equipment to increase the facility's operational throughputs and to include all ranges of e-waste for processing.

The proposed technology types selected for the preferred application is aligned with the nature of the waste stream, the scale of operations, and the space available within the preferred site location. Alternative technologies would introduce additional environmental, operational, financial, and regulatory impacts that would not justify the result.

The current process undertaken by SGR Holdings is based on controlled low-temperature heating and mechanical separation of components from PCBs. The process is designed to maximise the recovery of intact electronic components while minimising environmental impacts, emissions, and material degradation.

Alternative technologies such as smelting, pyrolysis, chemical leaching, or high-temperature incineration would not be appropriate for the proposed operation for several reasons.

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Firstly, high-temperature technologies such as smelting or pyrolysis are typically designed for metallurgical extraction and bulk material recovery. These systems operate at substantially higher temperatures and are generally associated with significant air emissions, increased energy consumption, and more complex pollution control requirements. For example, smelting operations used in large-scale metal recovery facilities require furnaces capable of reaching temperatures exceeding 1,000°C and often generate emissions requiring advanced scrubbing and filtration systems. Such technologies would be disproportionate to the scale and intent of SGR Holdings' operations, which are limited to pre-processing and component separation prior to off-site refining by external facilities.

Secondly, chemical extraction or leaching technologies involve the use of hazardous acids and reagents such as nitric acid, hydrochloric acid, or cyanide-based solutions to dissolve and recover metals from PCBs. These processes generate hazardous liquid waste streams and significantly increase environmental and occupational health risks. The introduction of chemical recovery technologies would fundamentally alter the nature of the facility from a low-impact dismantling operation to a hazardous chemical processing facility, requiring substantially more infrastructure, specialist containment systems, and environmental management measures.

The continued use of the same technology as currently used by SGR Holdings will ensure operational consistency with lower risk of environmental impact. Existing mitigation measures, fire prevention protocols, ventilation systems, and handling procedures have already been developed around the current process. Introducing alternative technologies would require entirely different environmental controls and could increase risks relating to emissions, hazardous waste generation, chemical storage, or worker exposure.

The proposed expansion is therefore appropriately focused on scaling up an existing low-impact, low-temperature mechanical separation process that is already suited to the operational objectives of the facility and the industrial character of the surrounding area. Retaining the same technology ensures continuity, minimises additional environmental risks, and avoids the unnecessary introduction of more intensive or hazardous processing methods that are not required for the nature of the activity being undertaken.

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 SGR Holdings is considered to be ideal for the current as well as proposed operations. Chosen technology types were selected based on

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several aspects, including space needs and functionality. Designs and layouts for the operation are therefore considered to be optimal, avoiding the need for structural modifications or extensions to the existing warehouse and infrastructure. No additional development will be required.

7.6. Conclusion to the Alternatives Considered

SGR Holdings propose install additional equipment, inclusive of six scientific ovens, a dismantling machine, a stationary saw and a cylinder saw in order to increase their operational capacity. Additionally. SGR Holdings propose to include all ranges of e-waste for processing and not only PCBs.

The existing operations are housed within an existing warehouse (Unit 17), located in an established industrial complex, namely the Linbro Business Park. The proposed site and surroundings have completely been transformed due to ongoing industrial activities. The proposed site is also not located near any sensitive environmental features that would be impacted by the planned waste management activities. By using an existing facility, instead of relocating to an alternative location the need for land development is avoided. Employed personnel will be able to continue with work without disruption, also limiting possible resignations and job losses.

The proposed expansion and selected technology types are appropriately focused on scaling up an existing low-impact, low-temperature mechanical separation process that is already suited to the operational objectives of the facility and the industrial character of the surrounding area. Retaining the same technology ensures continuity, minimises additional environmental risks, and avoids the unnecessary introduction of more intensive or hazardous processing methods that are not required for the nature of the activity being undertaken.

Should the application for expansion and continued operation of SGR Holdings be rejected, then SGR Holdings 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, loss of valuable material and or increased disposal of e-waste to land.

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8. DESCRIPTION OF THE BASELINE ENVIRONMENT

8.1. Climate

Sandton, Johannesburg is characterised by the typical Highveld climate with warm, wet summers and cool, dry winters.

Summer months (October to March) are typically warm to hot with afternoon thunderstorms with majority of the annual precipitation occurring during this period. In contrast, winter months (May to August) are generally mild and dry, with cool mornings and evenings, low humidity, and very little rainfall. Frost, although uncommon, may occur in low-lying areas during cold winter mornings.

The area receives moderate to high annual sunshine levels and generally experiences good atmospheric dispersion conditions due to seasonal winds and summer rainfall. Average annual rainfall in the broader Johannesburg region ranges between 700–800 mm per year, while average summer temperatures of between 25°C and 30°C are common during the day, with daytime temperatures for the region typically ranging between 16°C and 20°C. Altitude also plays an important role in moderating temperatures, as Sandton is situated on the inland plateau at approximately 1,600 m above sea level.

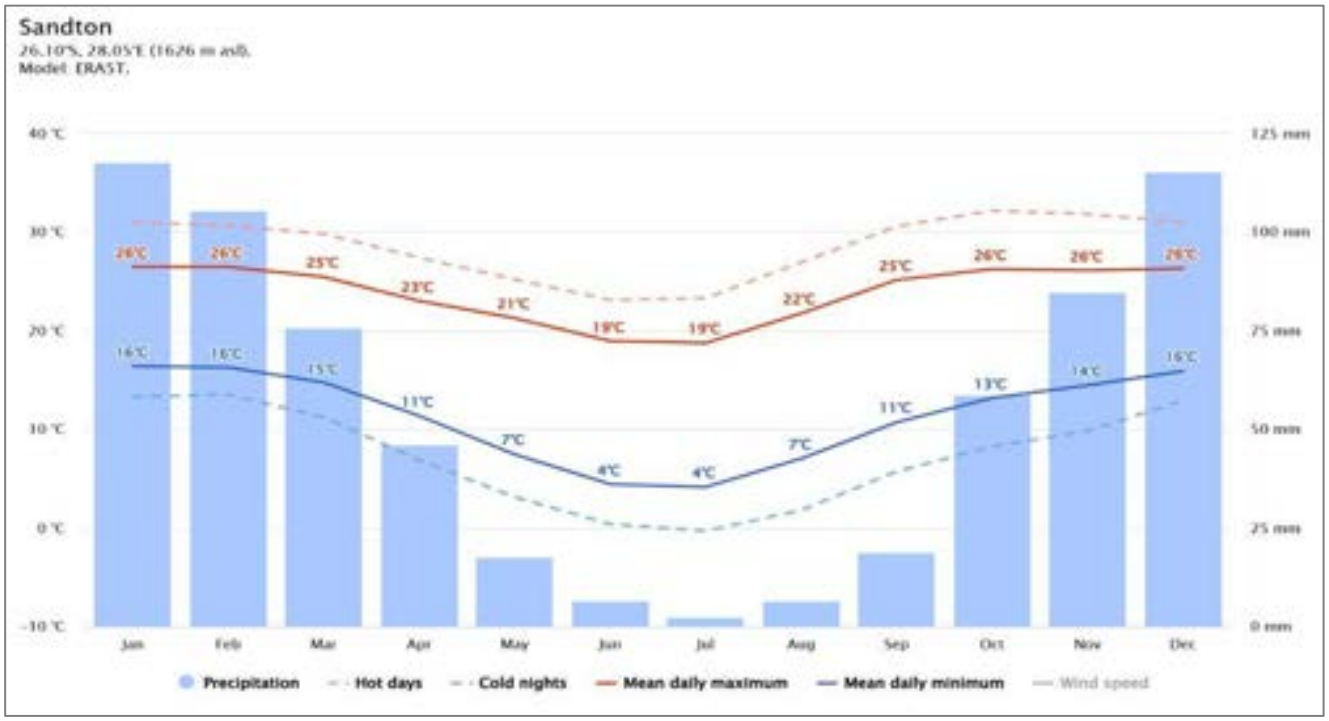

Figure 4: Mean temperatures and precipitation (Meteoblue, 2024)

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8.1.1. Mean Monthly Wind Direction and Speed

Sandton generally experiences moderate winds throughout the year, with prevailing wind directions typically from the north-eastern and north-western sectors during the summer rainfall season, and more frequent south-westerly to westerly winds during winter and post-frontal conditions.

Average wind speeds in the greater Johannesburg area are relatively low to moderate, generally ranging between approximately 2 and 5 m/s (7–18 km/h), although stronger gusts may occur during summer thunderstorms and winter cold fronts. Calm wind conditions are more common during winter mornings, which can occasionally contribute to reduced atmospheric dispersion potential.

The regional wind regime is influenced by the elevated inland plateau topography of the Highveld, which promotes generally good ventilation and dispersion conditions over much of the year.

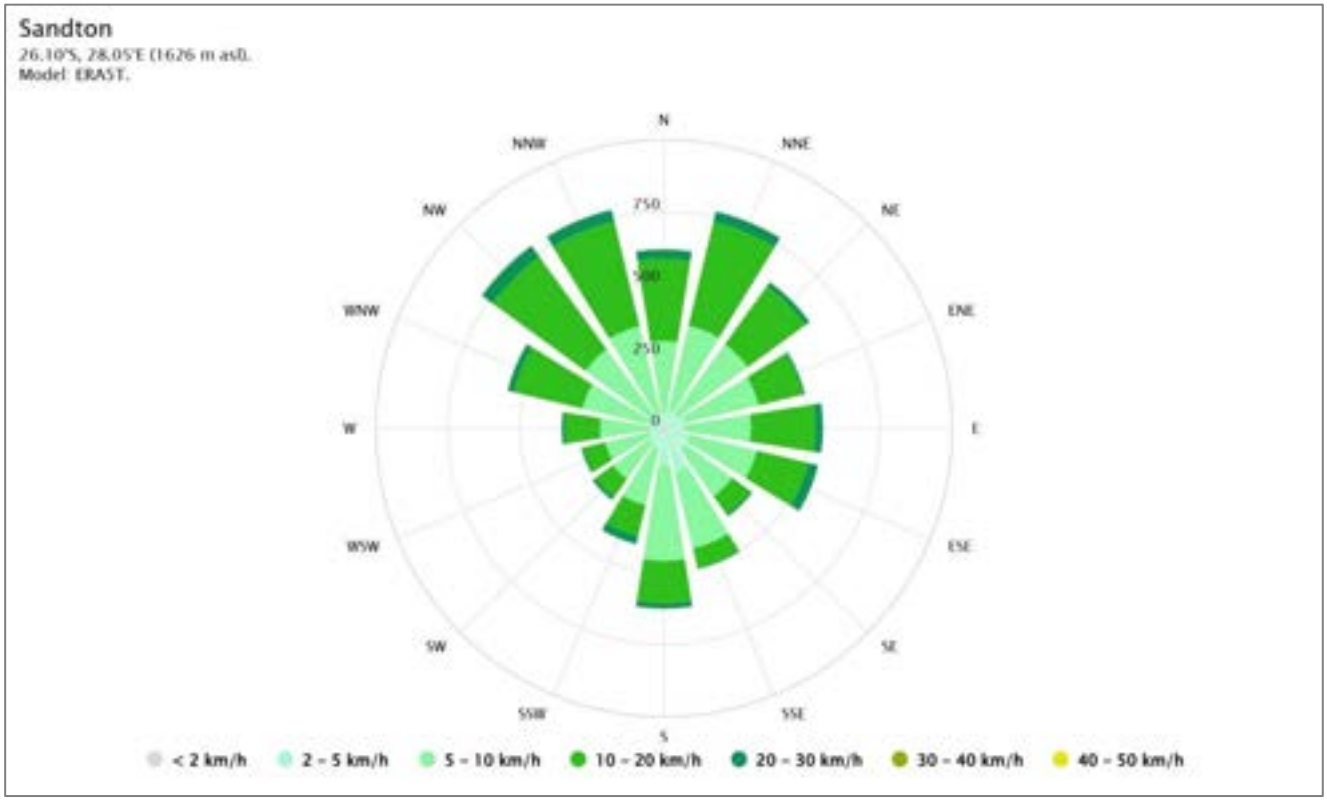

Figure 5: Annual Wind Rose, Sandton, Gauteng

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8.2. Hydrology

Sandton is situated within the upper catchment of the Jukskei River system, which forms part of the larger Crocodile River Catchment. The hydrology of the area is characterised by a network of seasonal and perennial drainage lines, stormwater channels, wetlands, and urban watercourses associated with the highly developed metropolitan environment.

Surface water flow in the area is strongly influenced by summer rainfall patterns, with peak runoff generally occurring during the wet summer months between October and March. Due to the high level of urbanisation within Sandton and the surrounding area, natural infiltration has been reduced in many areas by extensive paved surfaces, roads, and buildings, resulting in increased stormwater runoff rates and modified drainage patterns.

Groundwater occurrence in the area is generally associated with weathered and fractured rock aquifers of the underlying granite and dolomite geology of the broader Johannesburg region. Groundwater yields are typically moderate to low and are mainly utilised on a limited scale due to the availability of municipal water infrastructure.

Hydrological conditions within the Sandton area are also heavily managed through engineered stormwater systems, attenuation ponds, and municipal drainage infrastructure designed to reduce flooding risks and control runoff within industrial, commercial, and residential developments.

8.3. Topography

Sandton is located on the interior plateau of the South African Highveld at an elevation of approximately 1,550–1,650 m above sea level. The topography is generally characterised by gently undulating terrain with moderate slopes and broad ridges typical of the Gauteng region.

The landscape mainly consists of rolling plains interspersed with shallow drainage lines, small valleys, and occasional rocky outcrops associated with underlying granite geology. Localised depressions and watercourses occur within the catchments of tributaries feeding into the Jukskei River system.

Urban development within Sandton and surrounding areas has substantially altered the natural topography by means of earthworks, construction of roads, platforms and stormwater infrastructure. The broader area still retains the characteristic of the elevated Highveld landform, which contributes to relatively good surface drainage and atmospheric dispersion conditions.

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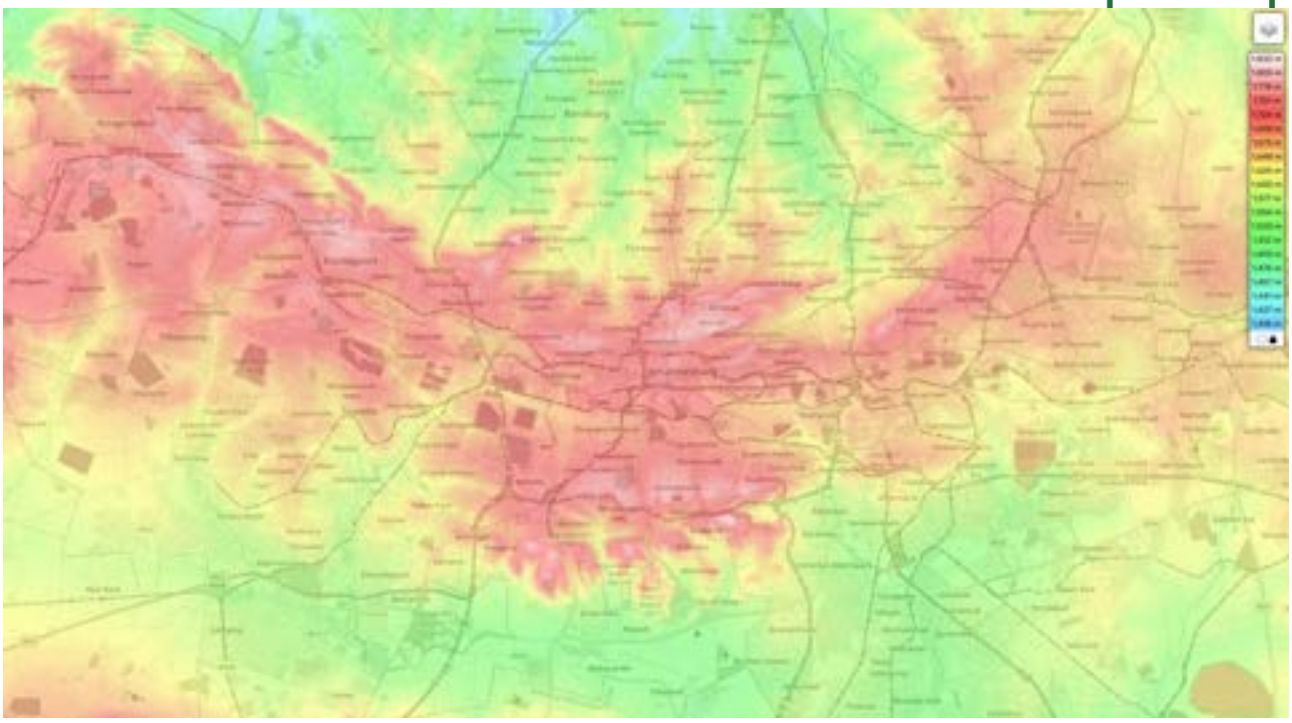

Figure 6: Johannesburg Topographic Map

8.4. Geology and Soils

Sandton is underlain predominantly by ancient granitic and gneissic rocks of the Johannesburg Dome Granite and associated basement formations within the Kaapvaal Craton. These rocks are among the oldest geological formations in South Africa and are typically hard, crystalline, and moderately weathered near the surface. In certain areas of the broader Johannesburg region, dolomitic formations may also occur, although granitic geology is generally dominant within the Sandton area.

The soils in the area commonly consist of sandy to sandy-clay loams with varying depths. Residual soils are often moderately well drained and may contain ferricrete or clay-rich horizons. Soil profiles in developed

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urban and industrial areas are frequently disturbed due to historical construction activities, filling, excavation, and compaction associated with urban expansion.

From an engineering perspective, the soils are generally suitable for urban and industrial development.

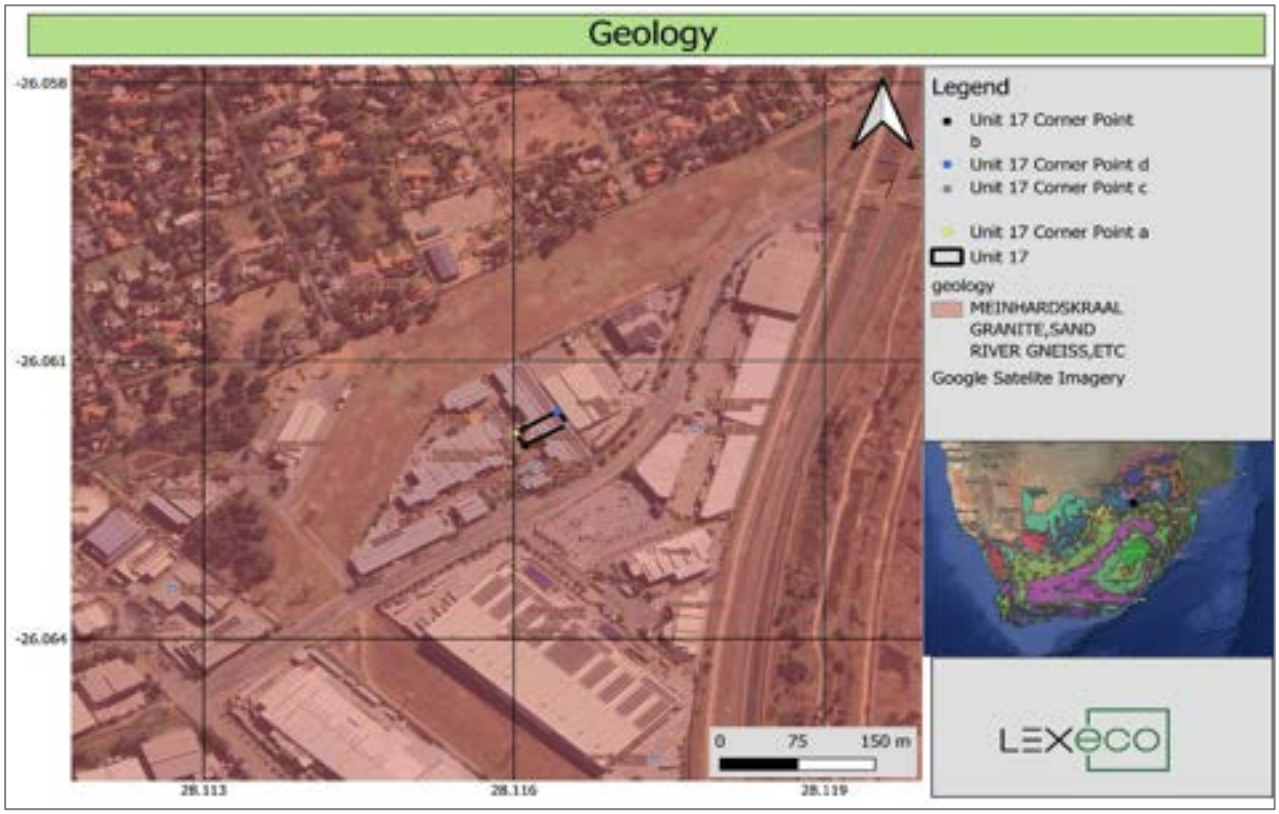

Figure 7: Area Geology and Soil Composition

8.5. Vegetation

Sandton falls within the Egoli Granite Grassland vegetation type as classified within the Grassland Biome of South Africa. This vegetation community is characterised by open grassland dominated by perennial grasses with scattered shrubs and very limited natural tree cover under undisturbed conditions.

Historically, the area supported species-rich Highveld grassland vegetation adapted to seasonal summer rainfall, periodic fire, and grazing processes. Common grasses include species such as Themeda triandra

(red grass), while herbaceous species and geophytes contribute to biodiversity during the summer growing season.

Due to extensive urbanisation and industrial development within the greater Sandton and Johannesburg metropolitan area, much of the original natural vegetation has been transformed or fragmented by roads, buildings, commercial infrastructure, and residential expansion. Remaining vegetation within the area is therefore largely modified and consists of landscaped areas, secondary grassland, alien invasive species, and ornamental vegetation associated with urban environments.

Natural ecological areas are generally confined to open spaces, drainage lines, wetlands, and undeveloped portions of the landscape, where remnant grassland vegetation may still occur.

Figure 8: Area Vegetation

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8.6. Socio-Economic

SGR Holdings operate from within an the Linbro Business Park which falls within the jurisdiction of the City of Johannesburg Metropolitan Municipality in the Gauteng Province.

Linbro Business Park is a premier, high-demand industrial logistics hub in Sandton, characterized by modern warehousing, low vacancies (below 5% as of 2024), and logistics tenants. Its demographic is defined by a strategic economic mix, bordering the affluent Modderfontein area while providing crucial employment opportunities for the adjacent, densely populated residential area of Alexandra.

Regional data indicates that the area is diverse, with approximately 57% Black African and 28% White residents, featuring a young working-age population with strong representation from isiZulu, English, and Afrikaans speakers. The area is a key job creation zone, particularly for residents of Alexandra, offering opportunities ranging from logistics to administration.

Demographic Information for Johannesburg, Gauteng

Johannesburg	**2022 Census**
Population	4 803 262
Households	1 841 917
Average Household Size	2.6
Age of the Johannesburg Population	
0-14	21.9&
15-64	35.0%
65+	5.0%
Sex	
Male	50.37%
Female	49.63%
Education	
No Schooling	3.5%
Grade 12	n.a
Higher Education	15.0%
Household Services	
Flushing Toilet	93.0%
Piped water inside dwelling	77.1%
Electricity for lighting	94.1%

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8.7. Site Verifications

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

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

As there will be no land clearance or expansion of the existing physical footprint of the site, the site sensitivities are considered to be low to very low. Since SGR Holdings already operates form within an existing warehouse in an established industrial area, little to no natural vegetation remains present. The site and surrounding area has been subject to decades of development for urban as well as industrial purpose, resulting in a completely altered landscape. 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 industrial operations that dominate the site and direct surroundings.

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

8.7.1. Agriculture and Land Use

SGR Holdings operate from within an existing warehouse (Unit 17) which forms part of the Linbro Business Park which was initially developed for the purpose of light industrial development. The property's zoning and development is also in line with the objectives of the City of Johannesburg's spatial development framework. The possibility for the site and or surroundings to be developed for agricultural use is considered to be low.

The "High" sensitivity rating assigned by the National Screening Tool is considered to be inaccurate and is therefore disputed. Due to the current land use and status of the site, no agricultural impact assessment will be undertaken or included in the Impact Assessment phase of this application.

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Figure 9: Aerial view of SGR Holdings and surrounding area

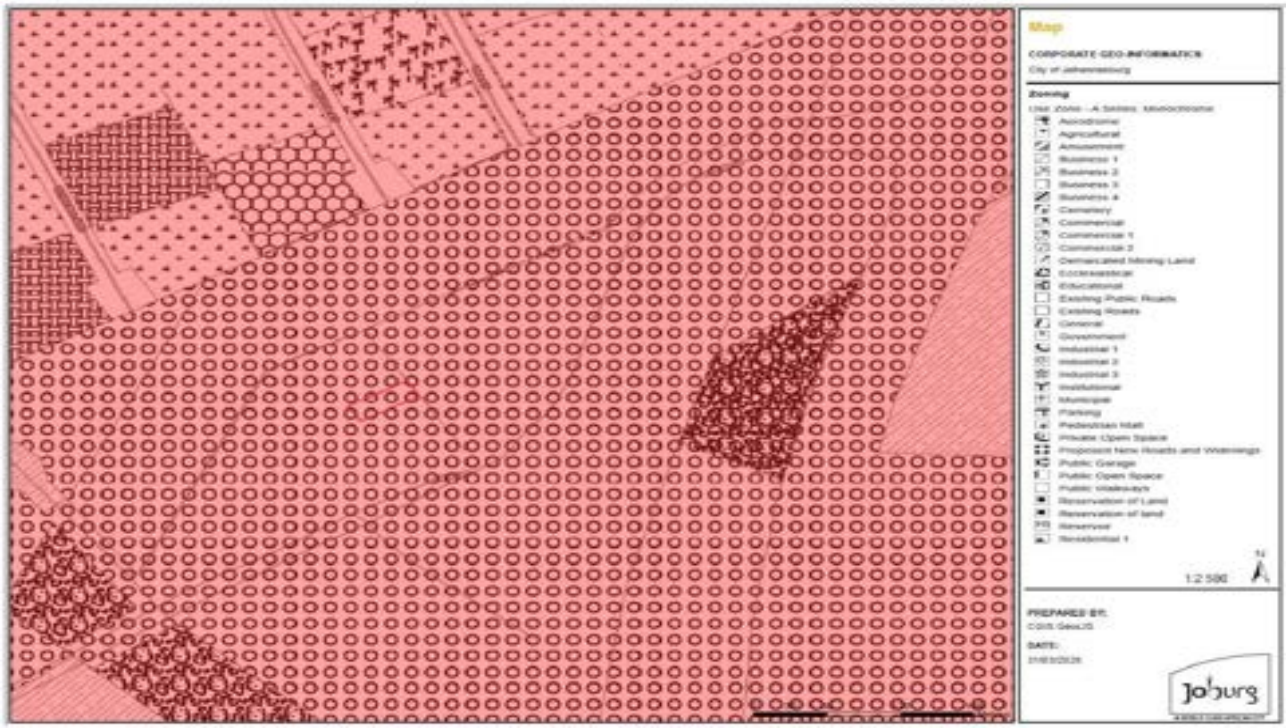

Figure 10: Property Zoning according to the COJ SDF

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Figure 11: Land Use Map

- **Site Photos**

Photo 1: External view of Unit 17 in the Linbro Business Park

Photo 2: Warehouse (Unit 17) entrance

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Photo 3: General view of warehouse and operational areas

Photo 4: General view of warehouse and operational areas

8.7.2. Terrestrial Biodiversity

The Linbro Business Park was developed in the early 1980' followed by phased expansions to accommodate the growing demand for warehousing with easy access to road networks that would support transport and logistical operations.

Decades of urban encroachment, development and industrial activity in the area has led to a decline in terrestrial biodiversity being present on site. Warehouse complexes, development of roads and landscaping have resulted in loss of natural vegetation and ecosystems needed to support terrestrial biodiversity in the area.

The Linbro Business Park falls within the outskirts of the Egoli Granite Grassland, which is an endangered, endemic vegetation type found only on the Halfway House Granite Dome in Gauteng and is classified as an Ecologicla Support Area (ESA). This species-rich grassland is highly threatened by urbanization and development in Johannesburg which has led to widespread habitat loss.

Active conservation efforts are underway in an attempt to protect what is left of the vegetation type and associated biodiversity. The operation of an industrial site may not be seen as supportive with regards to conservation efforts, however by utilising an existing site with supporting infrastructure which is already zoned for industrial purposes will avoid the need for virgin land development all together. By focusing industrial operations to an already developed area, overall impacts on the receiving environment are also reduced.

By approving this application, SGR Holdings will be able to continue with existing operations at a larger scale which in turn will allow the facility to accept a wider range of e-waste for processing. The current warehouse leased by SGR Holdings was assessed and found to be ideally located for the proposed

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operations. In addition, available space within the warehouse is considered sufficient to house the existing operations as well as the increased capacity should the expansion be authorised.

Continued operation within the already leased warehouse will therefore avoid any impacts on the terrestrial biodiversity of the area.

8.7.3. Surface Water and Wetlands

The warehouse (Unit 17) leased by SGR Holdings is located within the A21C quaternary catchment as illustrated in Figure xxx below.

The western section of Linbro Business Park drains towards the Jukskei River and the eastern half of Linbro drains towards the Modderfonteinspruit, a tributary of the Jukskei River. A channelled valley bottom wetland is located on either side of the Jukskei River.

Seep and unchanneled wetlands also drain in the Jukskei River as indicated in Figure 13 below. The Modderfonteinspruit has the Modderfontein dam located within its course and seep wetland draining into the stream. There are no National Freshwater Ecosystem Priority Area ("**NFEPA**") wetlands are located within the 500 m buffer of the Linbro Business Park and associated SGR Holdings operational site.

Figure 12: Area Hydrology, SGR Holdings

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8.7.4. Archaeology and Cultural Heritage

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

8.7.5. Civil Aviation and Defence

The high rating assigned by the National Screening tool has been contributed to the fact that the SGR Holdings operations are located approximately 8.26 km south southwest from Grand Central Airport and 15.68 km northwest from OR Tambo International Airport.

The proposed expansion and continued operation of the SGR Holdings operations will be housed within an existing warehouse which forms part of an already developed and existing industrial area. The proposed project will not encroach into any airspace and will pose no risk to ongoing aeronautical operations. Additionally, proposed operations will not have any impact on the operations of the national defence force.

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

8.7.6. Noise

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

8.7.7. Traffic

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

8.7.8. Air Quality

Sandton generally experiences moderate urban air quality conditions influenced by vehicular traffic, commercial and industrial activities, domestic fuel burning in surrounding areas, and seasonal meteorological conditions typical of the Gauteng Highveld region.

Air quality in the area tends to be better during the summer months due to increased atmospheric mixing, rainfall, and dispersion associated with thunderstorms and stronger winds. During winter, however, stable atmospheric conditions, temperature inversions, low wind speeds, and dry weather can reduce dispersion potential and result in temporary increases in particulate matter and other pollutants.

The main pollutants of concern within the greater Johannesburg metropolitan region generally include particulate matter (PM_{10} and $PM_{2.5}$), nitrogen oxides (NO_x), sulphur dioxide (SO_2), carbon monoxide (CO), and volatile organic compounds (VOCs), primarily associated with traffic emissions, industrial activities, and combustion sources. Dust generation from construction activities, roads, and exposed surfaces may also contribute to localised particulate impacts.

Despite the urbanised nature of the area, the elevated topography and generally moderate wind regime of the Highveld contribute to relatively good regional atmospheric dispersion for much of the year. Air quality management within the region is regulated through municipal and national environmental legislation, including monitoring initiatives implemented within the broader City of Johannesburg Metropolitan Municipality.

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 SGR Holdings.

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 SGR Holdings. Impacts from the proposed operations on the biophysical and socio-economic environment are explained in the following sections. The methodology is broadly consistent to that described in Integrated Environmental Management Series.

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

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The methodology applied to the assessment of the significance of potential impacts is based on the assessment criteria provided within the 1998 DEAT guidelines and the 2002 DEAT Information Series document (Impact Significance, Integrated Environmental Management, Information Series 5). The methodology has been adapted to be more user friendly and applicable to the proposed waste management activities and planned process, which is focused on the nature, extent, duration, intensity, probability of the identified impact.

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

Table 10: Risk Classification

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

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

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

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*

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

Table 11: Marks Awarded to Duration

DURATION	GUIDELINE	ASSIGNED VALUE
Permanent	Permanent	**10**
Long Term	As long as the facility is in operation	**7**
Medium Term	5 – 10 years	**5**
Short Term	0-4 years	**3**

Table 12: Marks Awarded for Probability

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

Table 13: Marks Awarded to Extent

EXTENT	GUIDELINE	ASSIGNED VALUE
International	Impact will result in international impacts	**10**
National	Impact will result impact on a national scale	**9**
Regional	Impact will result impact on a provincial or regional scale	**7**
Local	Impact will result impact on a local or municipal area scale	**5**
Immediate	The impact will be localised only to the project site	**3**

Table 14: Marks Awarded to Severity

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

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

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

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

Figure 13: Mitigation Hierarchy

Calculation of the Residual Risk Rating is calculated as follows;

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 15: Marks Awarded to Mitigation

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

Table 16: Degree to which an Impact can be Reversed

DEGREE	GUIDELINE	ASSIGNED VALUE
High	The impact can easily be reversed by applying little effort	**-8%**
Medium	The impact can be reversed by applying effective mitigation measures	**-6%**
Low	The chance of revering the impact is low. However, by applying extensive measures the impact can be reversed.	**-4%**
None	The impact cannot be reversed	**-0%**

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

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

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10. ANTICIPATED IMPACTS AND PROPOSED MITIGATION MEASURES

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

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

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

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

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

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Table 17: Identified Impacts and Recommended Mitigation Measures

ENVIRONMENTAL ASPECT	POTENTIAL IMPACTS	ANTICIPATED SR	PROPOSED MITIGATION MEASURES	ANTICIPATED RRR
Air Quality	Fugitive dust emissions from 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 • Install and maintain effective extraction systems to ensure proper ventilation of operational areas • Implement routine ambient VOC monitoring using passive sampling methods • Personnel working within operational areas to be equipped with appropriate PPE, inclusive of respirators, dust masks, gloves and eye protection	Low
	Exhaust emissions from vehicles and equipment	Moderate		Insignificant
	Generation of fumes or odors associated with the low-temperature heating of PCBs in scientific ovens	High		Low
	Potential release of small quantities of volatile compounds from heated adhesives or plastics	High		Low
Noise	Noise generated from dismantling machines, screening activities, forklifts, and general warehouse operations	High	• 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.	Low
	Temporary increases in noise levels during installation of additional equipment	High		Low
	Employees exposed to continuous noise leading to noise induced hearing loss	Moderate		Low

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ENVIRONMENTAL ASPECT	POTENTIAL IMPACTS	ANTICIPATED SR	PROPOSED MITIGATION MEASURES	ANTICIPATED RRR
Traffic	Route congestion during peak time traffic hours	Moderate	• All vehicles must be certified and comply with relevant traffic acts • Drivers must be dually licensed for the vehicle to be driven and equipment to be operated. • Transporting vehicles must not be overloaded. • Transporting vehicles must abide by all traffic rules and laws • Loads leaving the site must be covered in such a way as to limit the loss of material during transit	Low
	Degradation of road networks and infrastructure	Moderate		Low
Surface Water, Ground Water and Wetlands	Release of contaminated storm water 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	• Waste material to be stored in designated areas on paved or concreted surfaces, under a roof • Storm water infrastructure must be maintained to collect and divert clean storm water away from operational areas • Waste containers not stored under a roof must be equipped with lids or appropriately covered to limit the collection of rainwater during a rainfall event • A spill cleanup procedure must be developed and implemented for the effective cleanup and containment of hydrocarbon spills when they occur	Low

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ENVIRONMENTAL ASPECT	POTENTIAL IMPACTS	ANTICIPATED SR	PROPOSED MITIGATION MEASURES	ANTICIPATED RRR
Waste Management	Generation of residual waste such as PVC plastic, glass, packaging waste, filter dust, paper and cardboard	Moderate	• Waste management plan to be implemented during the operational phase • Waste which cannot be processed to be diverted to licensed facilities or landfill sites for safe disposal • Up to date records of waste generated and removed from site for recycling, recovery, treatment and or disposal to be kept up to date • Train employees in appropriate handling and management of waste materials • Limit the mixing of waste by labelling waste containers, bins and storage areas • Waste containers not stored under a roof must be equipped with a lid or appropriately covered to limit the collection of rainwater during a rainfall event. • Development of a standard operating procedure (SOP) for the handling and approved processing methods to be implemented	Low
	Inappropriate handling and storage of waste material, leading to soil or storm water contamination due to leachate generation	High		Insignificant
	Mixing of waste, reducing recycling and or recovery potential	High		Low
	Potential generation of damaged or non-recoverable electronic components requiring disposal at licensed facilities.	High		Insignificant
Occupational Health and Safety	Worker exposure to potential fumes, dust, sharp materials, hot surfaces or materials	High	• Draft and implement a fire prevention and emergency response procedure • Implement a training an awareness program to keep employees informed of the risks associated with their	Low

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ENVIRONMENTAL ASPECT	POTENTIAL IMPACTS	ANTICIPATED SR	PROPOSED MITIGATION MEASURES	ANTICIPATED RRR
			daily operations and relevant procedures to be implemented during an emergency • Development of an incident management procedure and maintenance of an incident register	
	Fire risks associated with electrical equipment and heating systems	Moderate	• All to undergo a general health and safety induction upon appointment • Personnel to be equipped with relevant PPE, inclusive of gloves, eye protection, hearing protection, dust masks and respirators (as applicable)	Low
Visual and Land Use Impacts	Minimal visual impact due to operations occurring within an existing warehouse structure	Low – Positive Impact	• Good housekeeping measures to be maintained throughout all phases of the project	Low – Positive Impact
Socio-Economic	Creation of employment opportunities	Positive Impact	No mitigation required. Positive Impact	Positive Impact
	Job security for already employed persons			
	Skills development			
Recovery and Recycling of Valuable Materials	Supported recovery of precious metals from a waste material	Positive Impact	No mitigation required. Positive Impact	Positive Impact
	Generation of recyclable materials such as plastic, glass and precious metals used by alternative industries for the manufacturing of quality goods and products			

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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 F** of this report for a copy of the site verification report.

12. CUMULATIVE IMPACTS

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

- Emissions due to operational equipment and machinery, impacting on overall ambient air quality
- Noise impacts due to industrial operations
- Soil and or water resource impacts due to improper waste management and handling
- Traffic-related impacts on the local road network due to the operation of the warehouse
- Occupational health and safety impacts on employees who would be exposed to operational risks
- 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 SGR Holdings 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**").

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13.1. Identification and Registration of I&AP's

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

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

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

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

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

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

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

Refer to Table 18 below for a restricted summary of the preliminary IAP register (Personal information restricted in compliance with the POPIA. All information to be included in Final coping Report).

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

Table 18: IAP Register (Restricted)

DEPARTMENT / REPRESENTATIVE	CONTACT PERSON	TEL	EMAIL	POSTAL / PHYSICAL ADRESS	REGISTERED AS IAP
STATE DEPARTMENTS AND RELEVANT AUTHORITIES					
Department of Forestry Fisheries and the Environment (*Competent Authority*)	Chief Directorate			Private Bag X447 Pretoria, 0001 Department of Environment, Forestry and Fisheries Environment House 473 Steve Biko Road Pretoria, 0002	✓ (CA)
Department of Forestry Fisheries and the Environment	Hazardous Waste Management			Private Bag X447 Pretoria, 0001 Department of Environment, Forestry and Fisheries Environment House 473 Steve Biko Road Pretoria, 0002	✓ (CA)

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DEPARTMENT / REPRESENTATIVE	CONTACT PERSON	TEL	EMAIL	POSTAL / PHYSICAL ADRESS	REGISTERED AS IAP
Gauteng Department of Environment	SUE Admin Unit			P.O. Box 8769 Johannesburg, 2000 56 Eloff Street Ground floor, Umnotho House, Johannesburg	
Gauteng Department of Environment	Pollution and Waste Management Khensani Mahatlani			P.O. Box 8769 Johannesburg, 2000 56 Eloff Street Ground floor, Umnotho House, Johannesburg	
Gauteng Department of Environment	Pollution and Waste Management Rhulani Chauke			P.O. Box 8769 Johannesburg, 2000 56 Eloff Street Ground floor, Umnotho House, Johannesburg	

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DEPARTMENT / REPRESENTATIVE	CONTACT PERSON	TEL	EMAIL	POSTAL / PHYSICAL ADRESS	REGISTERED AS IAP
City of Johannesburg Metropolitan Municipality	Environmental Manager Nozipho Maduse Impact Management, Environment and Infrastructure Services Department			Metropolitan Centre 158 Civic Boulevard Braamfontein, Johannesburg PO Box 1049 Johannesburg, 2000	
City of Johannesburg Metropolitan Municipality	Gift Mabasa Tshilidzi Tshimange Tensley Mashele Tumelo Marota Mashudu Ratshitanga			Metropolitan Centre 158 Civic Boulevard Braamfontein, Johannesburg PO Box 1049 Johannesburg 2000	
City of Johannesburg Metropolitan Municipality Ward 32/ Region E Ward councillor	Moloisane Dimakatso			-	

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DEPARTMENT / REPRESENTATIVE	CONTACT PERSON	TEL	EMAIL	POSTAL / PHYSICAL ADRESS	REGISTERED AS IAP
South African Civil Aviation Association Authority	Aviation Environmental Compliance Ms. Evelyn Shogole			PO Box 174 Cape Town International Airport	
STATE DEPARTMENTS AND RELEVANT AUTHORITIES					
Mistraline (Pty) Ltd	Stephen Rogers Landowner and landlord of Project site and adjacent warehouses of the Longlake Estate				✓ (Landowner)
Linbro Business Park Property Owners Association (Rf) Npc)	Jan Linkall				
Modderfontein Nature Reserve	General/Reception				
Krispy Kreme	General/Reception				
DCC Technologies	General/Reception				

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DEPARTMENT / REPRESENTATIVE	CONTACT PERSON	TEL	EMAIL	POSTAL / PHYSICAL ADRESS	REGISTERED AS IAP
GPT Global Payment Technologies	General/Reception				
Power Blends	General/Reception				
Microsep	General/Reception				
Gamma Tech	General/Reception				
ZulTrans	Chris Olivier				
OCD Systems	General/Reception				

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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 Citizen 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. Hand deliveries
3. Registered mail (only where no email address is available or where a written notice could not be delivered by hand to the interested party's business or residential address)

13.5. Circulation of the Draft Scoping Report

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

- **Hard Copy:** SGR Holdings, Administrative Office
  Unit 17, Linbro Business Park, 7 Mastiff Road, Sandton
- **Electronic Copies:** www.lexeco.co.za (for download)
  riette@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

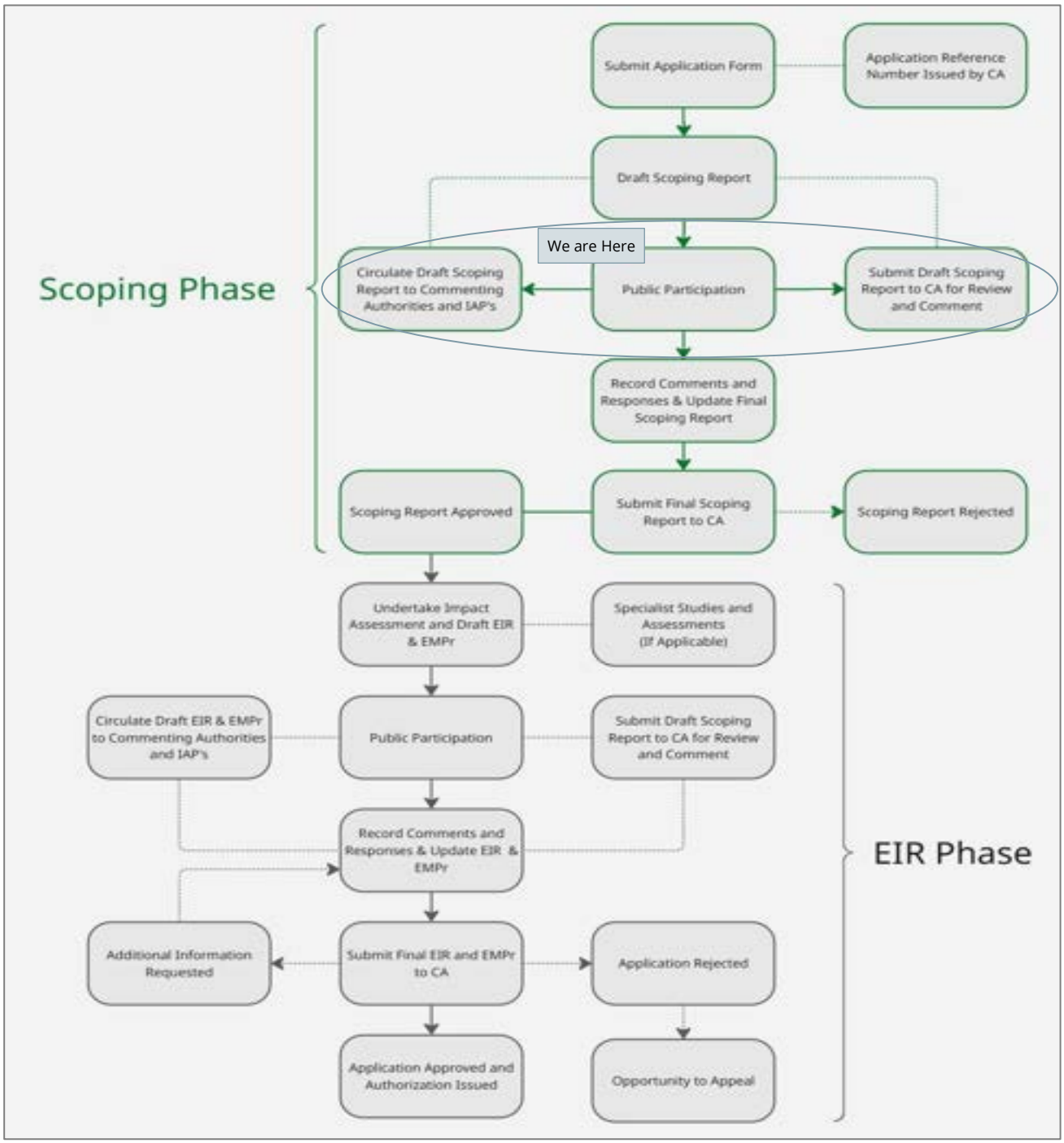

Figure 14: Full Scoping EIA Process Flow

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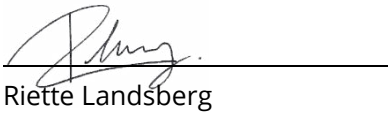
15. DECLARATION OF ENVIRONMENTAL ASSESSMENT PRACTITIONER

I, Riette Landsberg, 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.



Riette Landsberg
Environmental Assessment Practitioner
EAPASA Registration Number 2025/20547

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16. CONCLUSION AND RECOMMENDATIONS

SGR Holdings manage and operate a small-scale e-waste facility which specialise in the sourcing of printed circuit boards ("PCBs"), removed from used cell phones, computers, laptops and other electronics. Once received, the PCBs are manually inspected, screened and sorted by workers who remove unwanted fragments including glass, plastic and wiring that may still be present.

Manual processing of PCBs, although cost effective, still results loss of material that would require substantial processing before effective refining and recovery efforts can be implemented. In light thereof, SGR Holdings initiated an experimental trial to find a cost effective as well as efficient way of separating different components of e-waste to produce a higher value product, better suited for specialised refining and recovery of precious metals. Experimental trials were therefore undertaken by means of a pilot plant which consist of six (6) scientific ovens and two (2) dismantling machines which are used in sequence to process PCBs.

The existing operations, at capacity processes less than 500kg of e-waste (PCBs) per day, thus falling below the regulated threshold for recycling, recovery and treatment as set out in terms of Category A of GN 921 (as amended). Due to the confirmed success of the experimental trial, SGR Holdings now propose to implement a full-scale e-waste recycling, recovery treatment operation based on the same approach and process flow. If approved, AGR Holdings propose to install additional ovens, dismantling machines, a stationary saw and a cylinder saw which in turn will increase the existing operations processing capacity to exceed 1 500 kg/day when fully operational. The proposed upgrades will also allow SGR Holdings to accept a wider range of e-waste, inclusive of IT and telecommunication equipment (cell phones, laptops, computers, printers, routers, and tablets), consumer electronics (televisions, cameras, video and or audio equipment and gaming consoles), household appliances (microwaves, vacuum cleaners, electric kettles, and shavers, refrigerators washing machines dishwashers and electric ovens), tools and electrical toys for processing.

The expansion will be limited to the additional equipment being installed which will increase the existing operational capacity and average processing throughput. SGR Holdings propose to continue using the existing warehouse (Unit 17) which houses their current operations. No new development will be required. No extension to the warehouse structure or operational footprint will be required at this time. The warehouse in its current state is deemed sufficient in housing the existing as well as proposed operations after expansion.

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

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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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11 Alice Lane
Building 3, Sandhurst
Sandton 2196

Riette Janica Landsberg

ENVIRONMENTAL ASSESSMENT PRACTITIONER

Riette joined the LexEco team in 2025 and was successfully registered as an Environmental Assessment Practitioner in 2026. With over 12 years of consulting experience, working in the legislative environment, Riette is equipped to successfully translate regulation to industry implementation.

Riette's focus areas include environmental management, regulatory compliance, environmental auditing, monitoring and reporting. Riette has successfully led several EIA's and Basic Assessments and compiled multiple EMPr's for a range of projects linked to the manufacturing, mining, energy and construction sectors.

Education & Memberships

- EAPASA Registered - 2025/20547
- IAIA Member - 7822
- BSc, Hons in Environmental Science – Northwest University, 2013
- BSc, Environmental Science – Northwest University, 2012

Key Expertise

- National Environmental Management Act and EIA Regulations and related SEMA's
- Land Management, Licensing, EIA's and Permitting
- ECO functions
- Impact Assessment and Scoping Processes
- Monitoring and Reporting
- Water, waste and air quality management
- Public Participation
- Air Quality Management and Reporting
- Land contamination assessments
- Waste classifications and Management

Notable Experience

- Undertaking and successfully completing basic to complex Full Scoping EIA, Basic Assessment and or S24 Rectification Applications in terms of NEMA, NEMWA and NEMAQA.
- Drafting and implementation of Environmental Management Programs (EMPr's).
- Maintenance of client's environmental management systems by ensuring ongoing compliance and regulatory accuracy.
- Undertaking and assisting clients in environmental compliance audits.

Employment History

LEXECO - ENVIRONMENTAL ASSESSMENT PRACTITIONER & CONSULTANT | 2025 – PRESENT

Planning, managing, and coordinating environmental impact assessments (EIAs), Environmental Management Programs, Environmental Monitoring and Investigations, Environmental Compliance Auditing and Compliance Functions.

ZANTOW ENVIRONMENTAL CONSULTING SERVICES - ENVIRONMENTAL CONSULTANT | 2013 - 2025

Environmental Monitoring, Auditing and Reporting and Laboratory Manager. Planning, managing, and coordinating environmental impact assessments (EIAs), Environmental Management Programs.

Environmental Assessment Practitioners Association of South Africa

Registration No. 2025/20547

Herewith certifies that

RIETTE JANICA LANDSBERG

is registered as an

Environmental Assessment Practitioner

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

Effective: 01 April 2026

Expires: 31 March 2027

Chairperson

Registrar

SAQA

NORTH-WEST UNIVERSITY ®
YUNIBESITI YA BOKONE-BOPHIRIMA
NOORDWES-UNIVERSITEIT

HONOURS BACHELOR OF SCIENCE

in

ENVIRONMENTAL SCIENCES

awarded to

RIETTE JANICA LANDSBERG

after complying with all the requirements

GESERTIFISEER 'N WARE AFSKRIF
CERTIFIED A TRUE COPY
KOMMISSARIS VAN EDE
COMMISSIONER OF OATHS
CHARLES MARTIN PEARSON
Kommissaris van Ede / Commissioner of Oaths
Praktiserende Prokureur / Practising Attorney
RSA
F W Beyerstraat / F W Beyers Street
Omegagebou / Building, Vanderbijlpark
DE KLERK VERMAAK & VENNOTE

4 March 2014

Dr T Eloff
Vice-Chancellor

Prof M Verhoef
Registrar

University number: 21697418
Serial number: 179697

This is an English translation of the content of the original certificate issued in Afrikaans and conferred at a graduation ceremony held on 4 March 2014.

Annexure B: Site Maps

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Locality

Legend

- Unit 17 Corner Point b
- Unit 17 Corner Point d
- Unit 17 Corner Point c
- Unit 17 Corner Point a
- Unit 17

Google Satelite Imagery

LEXeco

Map

PREPARED BY: CGIS GeoLIS

DATE: 05/05/2026

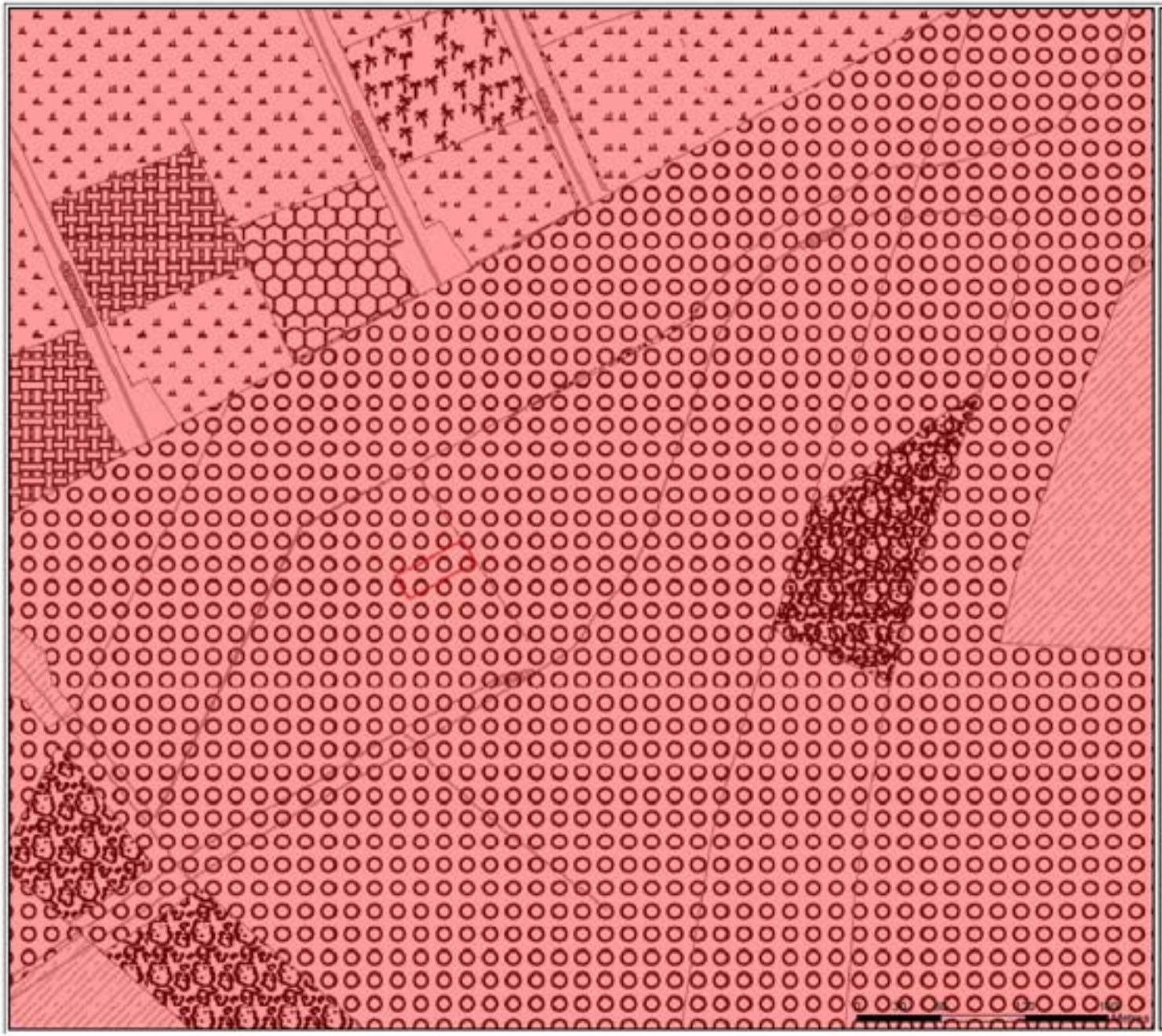
City of Johannesburg

CORPORATE GEO-INFORMATICS

1:32 000

N

Joburg
A WORLD CLASS AFRICAN CITY



Map

CORPORATE GEO-INFORMATICS

City of Johannesburg

Zoning

Use Zone - A Series: Monochrome

- Aerodrome
- Agricultural
- Amusement
- Business 1
- Business 2
- Business 3
- Business 4
- Cemetery
- Commercial
- Commercial 1
- Commercial 2
- Demarcated Mining Land
- Ecclesiastical
- Educational
- Existing Public Roads
- Existing Roads
- General
- Government
- Industrial 1
- Industrial 2
- Industrial 3
- Institutional
- Municipal
- Parking
- Pedestrian Mall
- Private Open Space
- Proposed New Roads and Widenings
- Public Garage
- Public Open Space
- Public Walkways
- Reservation of Land
- Reservation of land
- Reservoir
- Residential 1

N

1:2 500

PREPARED BY:

CGIS GeoLIS

DATE:

31/03/2026

Joburg

A WORLD CLASS AFRICAN CITY

Landuse

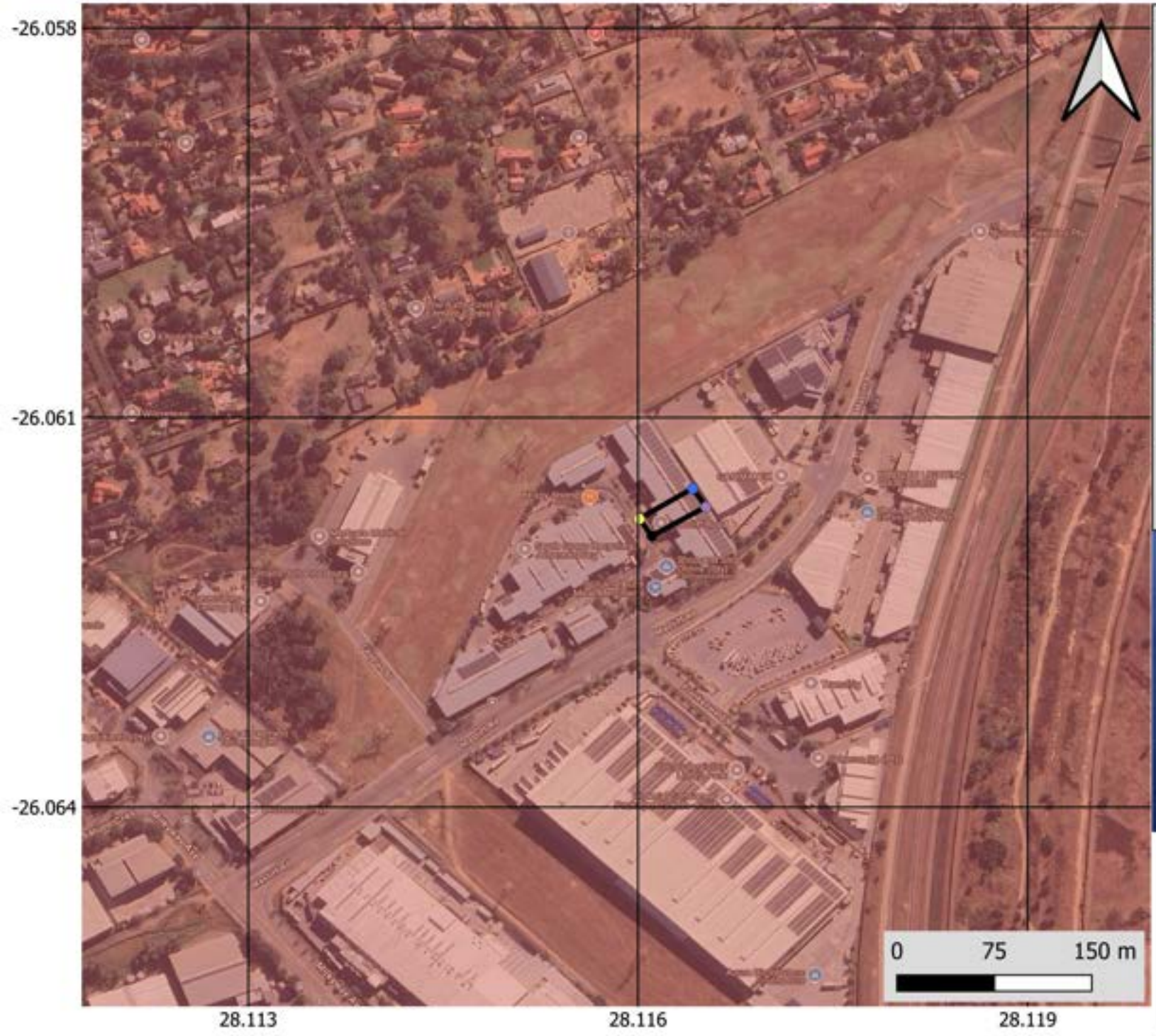
Legend

- Unit 17 Corner Point b
- Unit 17 Corner Point d
- Unit 17 Corner Point c
- Unit 17 Corner Point a
- Unit 17

Google Satelite Imagery

LEXeco

Geology



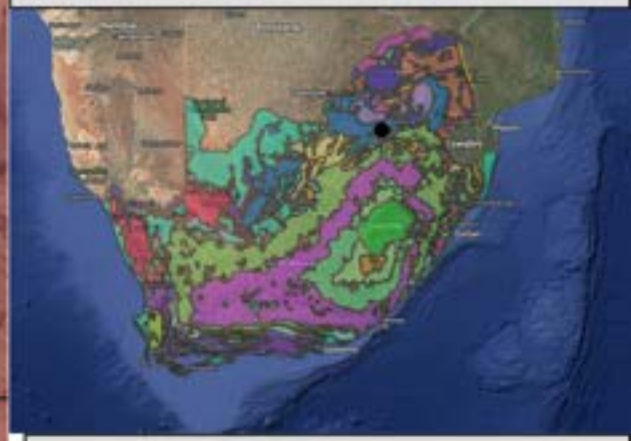
Legend

- Unit 17 Corner Point b
- Unit 17 Corner Point d
- Unit 17 Corner Point c
- Unit 17 Corner Point a
- Unit 17

geology

- MEINHARDSKRAAL GRANITE,SAND RIVER GNEISS,ETC

Google Satelite Imagery



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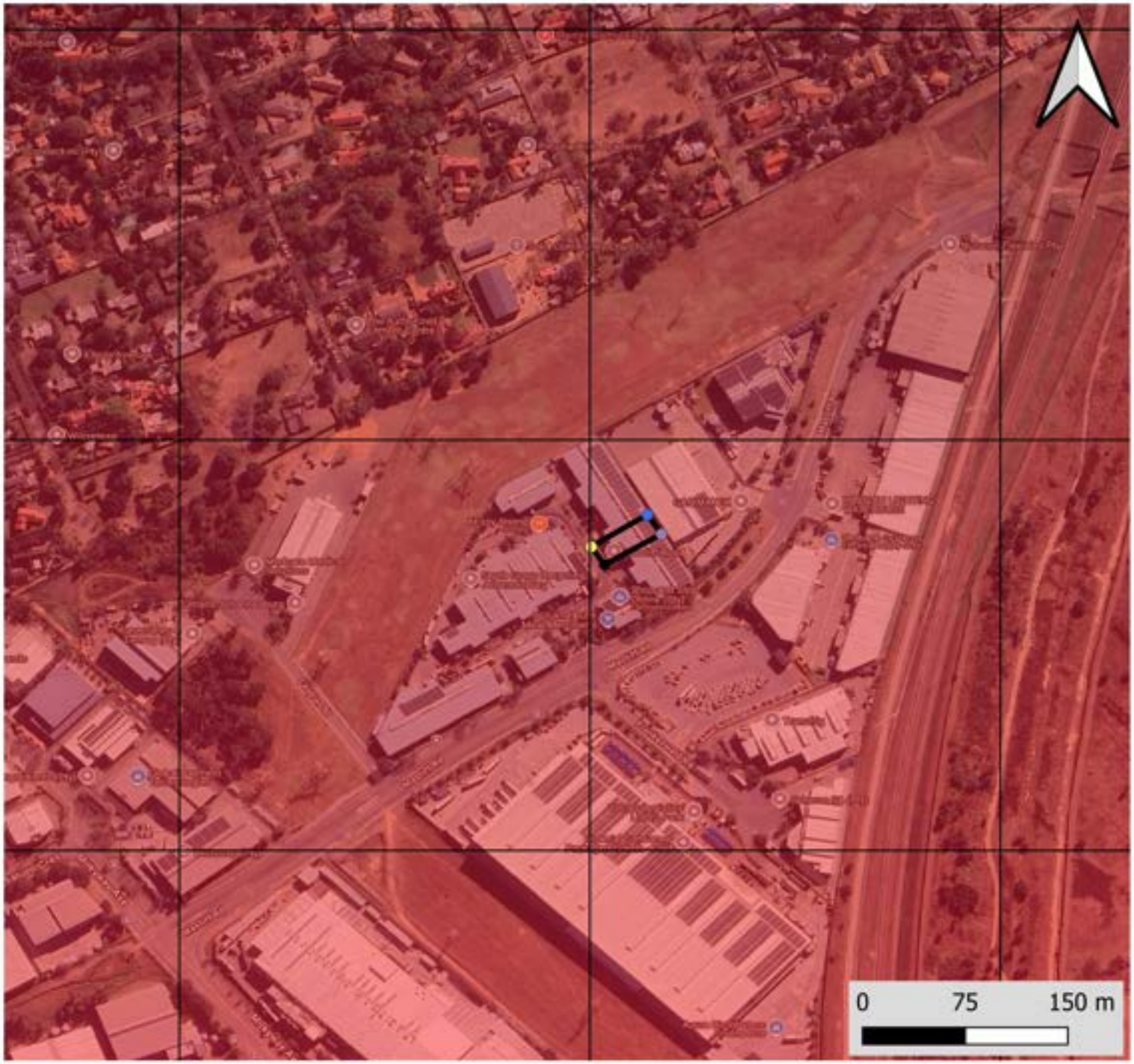
Soil Type



Legend

- Unit 17 Corner Point b
- Unit 17 Corner Point d
- Unit 17 Corner Point c
- Unit 17 Corner Point a
- Unit 17

SOTER soil association map

- Red, yellow and greyish soils with low to medium base status association of Ferralsols, Acrisols, Lixisols and Plinthosols. In addition, other soils with plinthic and gleyic properties may also be present)

Google Satelite Imagery

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National Vegetation

Legend

Unit 17

National Vegetation 2012 (SANBI)

Egoli Granite Grassland

Inset map

Google Satelite Imagery copy

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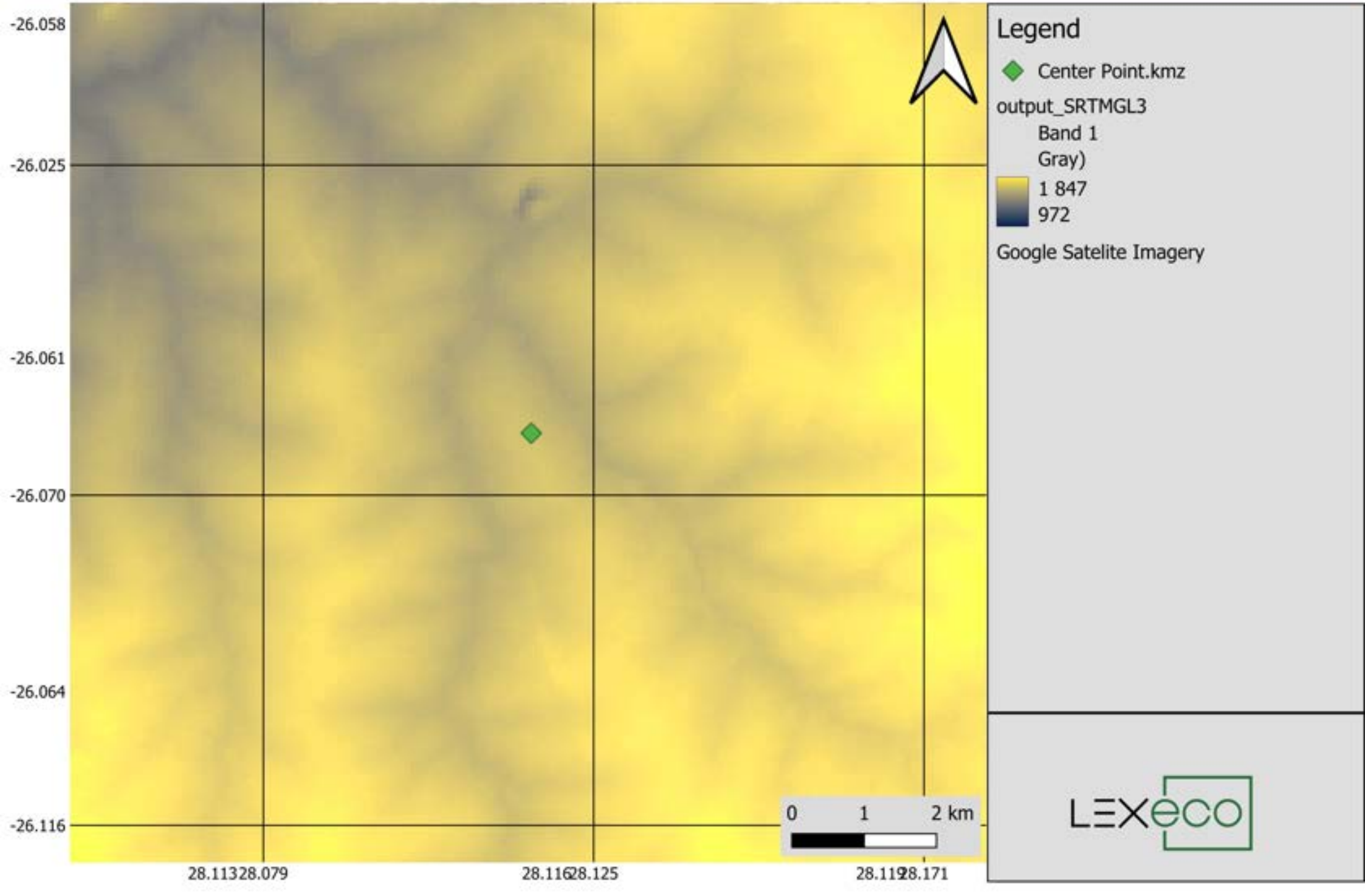
Topography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28.11328.079
28.11628.125
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1
2 km
Legend
Center Point.kmz
output_SRTMGL3
Band 1
Gray)
1 847
972
Google Satelite Imagery
LEXeco

Rivers and Wetlands

Legend

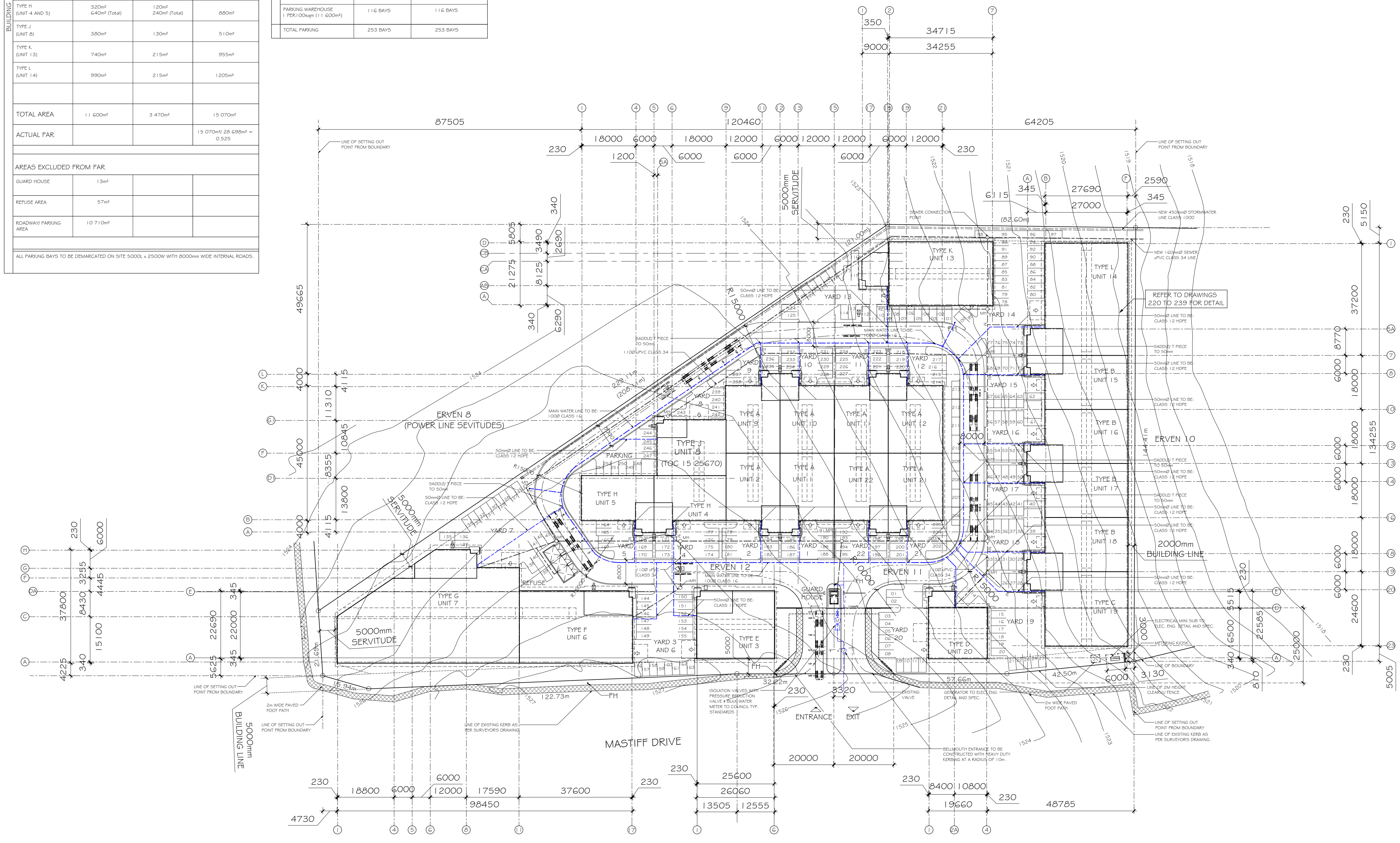
- Unit 17 Corner Point b
- Unit 17 Corner Point d
- Unit 17 Corner Point c
- Unit 17 Corner Point a
- Center Point.kmz
- Rivers and Waterways
- Wetlands
- Unit 17

Google Satelite Imagery

LEXeco

SCHEDULE OF AREAS				
BUILDING AREA	TYPE / UNIT NO.	BUILDING AREA WAREHOUSE	BUILDING AREA OFFICE	TOTAL FLOOR AREA
	TYPE A (UNITS 1, 2, 9, 10, 11, 12, 21 AND 22)	380m² 3 040m² (Total)	120m² 960m² (Total)	4000m²
	TYPE B (UNITS 15, 16, 17 AND 18)	470m² 1 880m² (Total)	150m² 600m² (Total)	2 480m²
	TYPE C (UNIT 19)	660m²	150m²	810m²
	TYPE D (UNIT 20)	335m²	115m²	450m²
	TYPE E (UNIT 3)	510m²	165m²	675m²
	TYPE F (UNIT 6)	780m²	295m²	1075m²
	TYPE G (UNIT 7)	1645m²	385m²	2030m²
	TYPE H (UNIT 4 AND 5)	320m² 640m² (Total)	120m² 240m² (Total)	880m²
	TYPE J (UNIT 8)	380m²	130m²	510m²
	TYPE K (UNIT 13)	740m²	215m²	955m²
	TYPE L (UNIT 14)	990m²	215m²	1205m²
	TOTAL AREA	11 600m²	3 470m²	15 070m²
	ACTUAL FAR			15 070m²/ 28 698m² = 0.525
	AREAS EXCLUDED FROM FAR			
	GUARD HOUSE	13m²		
	REFUSE AREA	57m²		
	ROADWAY/ PARKING AREA	10 710m²		
	ALL PARKING BAYS TO BE DEMARCATED ON SITE 5000L x 2500W WITH 8000mm WIDE INTERNAL ROADS.			

SCHEDULE OF RIGHTS LONGLAKE EXTENSION 1			
TOWN PLANNING	TOWN PLANNING SCHEME	MODDERFONTEIN TOWN PLANNING SCHEME 1994	
	SITE AREA	28 698 sqm	
	ZONING	INDUSTRIAL 1	
	OCCUPANCY CLASSIFICATION	G1 AND J3.	
	TITILE DEED NO.	T 087923/ 11.	
		PERMISSABLE	ACTUAL
	F.A.R.	0.6	15 085m² /28 698m² = 0.525
	COVERAGE	60%	13 405m² /28 698m² = 47%
	HEIGHT	2 STOREYS	2 STOREYS
	BUILDING LINES	5000mm ALONG MASTIFF DRIVE 2000 ALONG OTHER BOUNDARIES	
	PARKING	REQUIRED	PROVIDED
	PARKING OFFICES 4 PER100sqm (3 470m²)	137 BAYS	137 BAYS
	PARKING WAREHOUSE 1 PER100sqm (11 600m²)	116 BAYS	116 BAYS
	TOTAL PARKING	253 BAYS	253 BAYS



SITE PLAN
SCALE 1 : 500

REFERENCE DRAWINGS
THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT APPROVED DOCUMENTATION FOR THIS CONTRACT.

GENERAL NOTES:

* ALL BUILDING WORK AND BUILDING REQUIREMENTS ARE TO BE CARRIED OUT IN STRICT ACCORDANCE WITH THE REQUIREMENTS OF THE NATIONAL BUILDING REGULATIONS AND BUILDING STANDARDS ACT (No 103 OF 1977).
* THIS DRAWING IS NOT TO BE SCALED. USE FIGURED DIMENSIONS ONLY.
* ALL DIMENSIONS AND LEVELS TO BE CHECKED ON SITE BEFORE ANY WORK IS COMMENCED.
* ANY DISCREPANCIES OR QUERIES RELATED TO THIS DRAWING ARE TO BE REFERRED TO THE ARCHITECT BEFORE ANY WORK IS COMMENCED.
* REINFORCED CONCRETE AND STRUCTURAL STEELWORK IS TO BE IN ACCORDANCE WITH THE SRUCTURAL ENGINEER'S DESIGN AND SPECIFICATIONS.
* ALL LIGHTING AND VENTILATION MUST COMPLY WITH PART "O" OF THE NATIONAL BUILDING REGULATIONS.

DRAINAGE NOTES:

* ALL DRAINAGE RUNS TO BE ACCESSIBLE ALONG THEIR ENTIRE LENGTH.
* V.P.'s TO BE CARRIED UP TO 2m ABOVE ANY WINDOW OR DOOR OPENING IN THE BUILDING OR ANY OTHER BUILDING WITHIN A DISTANCE OF 6m.
* INSPECTION EYES (i.e.'s) TO BE PROVIDED AT ALL BENDS AND JUNCTIONS OF SOIL AND WASTE PIPES.
* RODDING EYES (r.e.'s) TO BE PROVIDED AT HEADS OF DRAINS AND AT A MAXIMUM OF 25m SPACINGS ALONG RUNS OF DRAINS.
* MARKED COVERS TO BE PROVIDED AT GROUND LEVEL FOR i.e's BELOW PAVING
* RESEAL TRAPS TO BE PROVIDED TO ALL WASTE FITTINGS.
* SOIL WATER DRAINS PASSING UNDER BUILDINGS TO BE ENCASED IN 150mm CONCRETE ALL ROUND AND BE PROVIDED WITH r.e.'s AS CLOSE TO THE BUILDING AS POSSIBLE AT BOTH ENDS.
* SOIL WATER PIPES HAVING A VERTICAL DROP EXCEEDING 1200mm TO THE MAIN DRAIN TO BE ANTI-SYPHONED.
* ALL BRANCH DRAINS EXCEEDING 6m IN LENGTH TO BE VENTED.
* uPVC PIPES ARE TO BE LAID IN ACCORDANCE WITH THE MANUFACTURERS TECHNICAL SPECIFICATIONS.

FIRE DEPARTMENT'S REQUIREMENTS:

* FIRE PROTECTION TO BE IN ACCORDANCE WITH PART "T" OF THE NATIONAL BUILDING REGULATIONS.
* ALL WORK IS TO COMPLY WITH ACT 103/77 AND WITH SABS 0400 -1990
* FIRE HYDRANTS EXITS AS SHOWN ON PLANS.
* a) EXTINGUISHERS 2x 4.5 KG DCP TO BE INSTALLED AT EACH HOSE REEL IN ACCORDANCE WITH SABS 810, SABS 889 OR SABS 1151 WHERE APPROPRIATE TO BE INSTALLED, MAINTAINED AND SERVICED IN ACCORDANCE WITH SABS 0105.
  b) HOSE REELS 30m IN LENGTH TO BE RELOCATED AS SHOWN ON PLAN AND TO BE INSTALLED IN ACCORDANCE WITH SABS 543.
  c) HYDRANTS TO BE INSTALLED IN ACCORDANCE WITH SABS 1128 PART II.
* PORTABLE FIRE EXTINGUISHERS TO BE HUNG ON PURPOSE MADE BOARDS AND LOCATED IN SECURE POSITIONS AS INDICATED ON PLAN AND TO COMPLY WITH TT37.
* CLASS "B" FIRE DOORS TO COMPLY WITH SABS 1253 AND TO BE FITTED WITH APPROVED SELF CLOSING OR AUTOMATIC CLOSING DEVICES.
* STRUCTURAL ELEMENTS AND COMPONENTS TO COMPLY WITH TT7.
* FIRE EXIT DOORS ARE TO BE FITTED WITH EMERGENCY EXIT LOCKSETS AS APPROVED BY THE LOCAL AUTHORITY.
* SYMBOLIC SAFETY SIGNS TO BE IN ACCORDANCE WITH SABS 1186 AND POSITIONED AS REQUIRED BY THE FIRE DEPARTMENT.

REV	BY	DATE	DESCRIPTION
A	MB	29.08.13	TYPE J CHANGED TO TYPE H. TYPE L CHANGED TO TYPE K. TYPE M CHANGED TO TYPE L.
B	MB	10.09.13	PARKING BAYS AMENDED. ELECTRICAL MINI SUB AND GENERATOR ADDED.
C	MB	25.10.13	PARKING BAYS UPDATED. GRID LINES ADDED TO TYPE BCL.
D	MB	04.11.13	SCHEDULE OF AREAS UPDATED.
E	MB	12.11.13	GRID LINES ADDED TO BUILDING TYPES. SETTING OUT POINTS FROM BOUNDARIES ADDED.
F	MB	13.01.14	MAIN WATER LINE ADDED. SEWER LINES AND MH AMENDED.
G	MB	06.02.14	POSITIONS OF SIGNAGE PANELS ADDED.
H	MB	20.02.14	50mm WATER RETICULATION ADDED.
1.	MB	11.06.14	ALL ENTRANCES TO UNITS CHANGED TO 6m WIDE. ROADWAY TO MAIN ENTRANCE INCREASED TO 8m WIDE. REVISIONS TO THE ENTRANCE OF TYPE K.
2.	MB	15.07.14	KERBS AMENDED TO UNITS 1,2,4,10, 11, 13, 15,16,17,18 and 22.

STRATFORD
PROPERTY VENTURES

ROGER DAVIES ARCHITECTS
19 SANDPIPER AVENUE,DOUGLASDALE EXT 25
PO Box 232, North Riding 2162
Tel: +27 (11) 467-6025 fax: +27 (11) 467-6024
Cell: 082 773 6187

CLIENT/ TENANT

PROJECT NAME

PROPOSED NEW MINI UNITS
FOR STRATFORD PROPERTY VENTURES
LINBRO PARK PHASE 6 ON
ERVEN 11 AND 12 LONGLAKE EXT. 1,
ON MASTIFF DRIVE.

DRAWING TITLE

SITE PLAN

SIGNATURE / DATE OF APPROVAL	
	DESIGNED Roger Davies
	DRAWN M Brown
	CHECKED
	SCALE AS SHOWN

DATE	PROJECT No.	DWG No.	REV.
17/01/2012	1208	100-2	

FOR CONSTRUCTION

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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Outlook

Application for the registration in terms of the National Norms and Standards - SGR Holdings

From Riette Landsberg <Riette@lexeco.co.za>
Date Tue 19 May 2026 09:17
To Licensing <licensing@dffe.gov.za>

2 attachments (4 MB)
1. South Group CPT_N.S App_Cover Letter.pdf; 2. Unit 17 Norms and Standards Registration Application Form.pdf;

Dear Licensing,

Please find attached a copy of an application for the registration of SGR Holdings 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
EAPASA Reg Nr: 2025/20547

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

Annexure E: National Screening Tool Report

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

EIA Reference number: Not Yet Applicable

Project name: SGR Holdings (Pty) Ltd Expansion

Project title: Expansion and continued operation of the SGR Holdings e-waste management facility

Date screening report generated: 30/03/2026 13:32:03

Applicant: SGR Holdings (Pty) Ltd

Compiler: LexEco (Pty) Ltd

Compiler signature:

.....

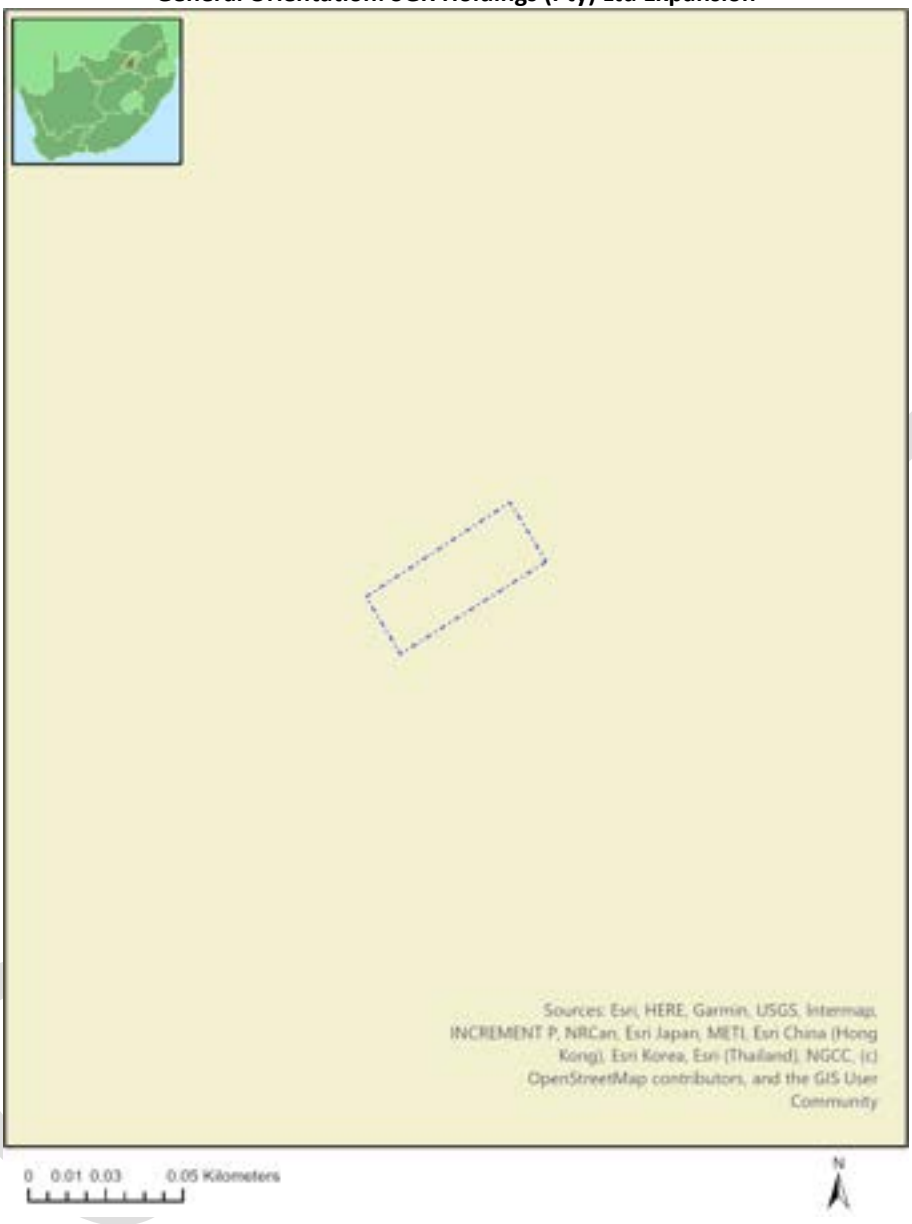
Application Category: Services|Waste Management Services|Storage Facilities|Hazardous

Table of Contents

Proposed Project Location

Orientation map 1: General location

General Orientation: SGR Holdings (Pty) Ltd Expansion



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	LONGLAKE	93	0	26°3'43.55S	28°6'55.85E	Erven
2	LONGLAKE	710	0	26°3'46.8S	28°7'10.47E	Farm
3	LONGLAKE	710	1	26°3'51.28S	28°6'59.86E	Farm Portion

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	12/12/20/2147	Solar PV	Approved	15.6
2	12/12/20/2147/A1	Solar PV	Approved	15.6
3	12/12/20/2530	Solar PV	Approved	26.2
4	12/12/20/2551	Solar PV	Approved	26.4
5	14/12/16/3/3/2/375/AM1	Solar PV	Approved	29.6

[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.

6	14/12/16/3/3/2/375	Solar PV	Approved	29.6

Environmental Management Frameworks relevant to the application

Environmental Management Framework	LINK
Gauteng EMF	https://screening.environment.gov.za/ScreeningDownloads/EMF/GPEMF_2021_Gazette_and_summary.pdf

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	Implication

or prohibition	
Strategic Transmission Corridor-Central corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Combined_EGI.pdf
Gauteng EMF-Urban development zone 1	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Zone1_2021.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	
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_P

		rotocols.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)
High	08. Moderate
High	09. Moderate-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)
Medium	Mammalia-Chrysospalax villosus
Medium	Mammalia-Crocidura maquassiensis
Medium	Mammalia-Dasymys robertsii
Medium	Mammalia-Hydrictis maculicollis
Medium	Mammalia-Ourebia ourebi ourebi
Medium	Invertebrate-Clonia uvarovi

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

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

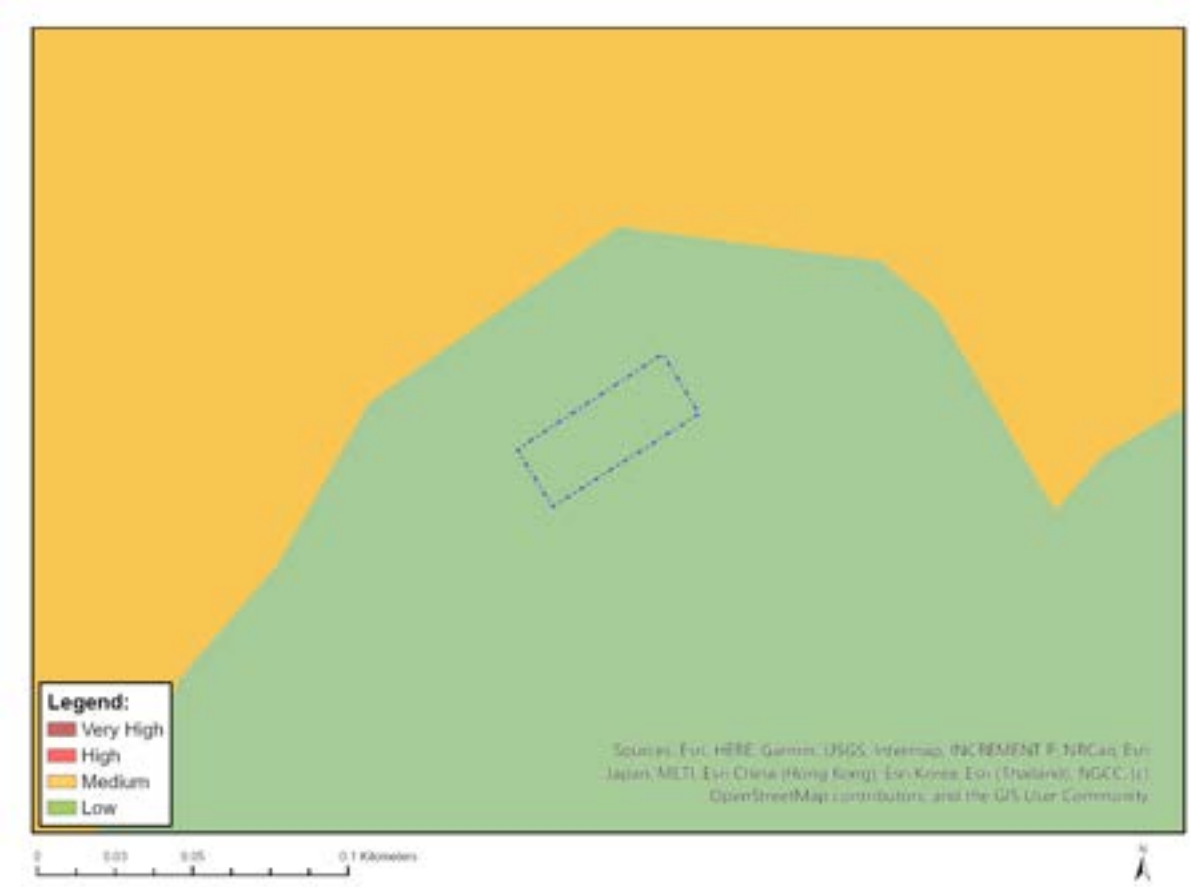
MAP OF RELATIVE DEFENCE THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Military and Defence Site

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



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

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	CR_Egoli Granite Grassland

Annexure F: Site Verification Report

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Site Verification Report

SGR Holdings (Pty) Ltd

Site Verification Report in Support of the WML Application for the Expansion of the E-waste Recycling, Recovery and Treatment of facility operated by SGR Holdings (Pty) Ltd

14 May 2026

Report Nr: SGH-007-LEX-2026

Where law meets sustainability.
Legal insight. Sustainable impact.

info@lexeco.co.za | +27 (010) 023 8543 | www.lexeco.co.za

Report Title	**Site Verification Report in Support of the WML Application for the Proposed Expansion and Operation of the SGR Holdings E-waste Recycling, Recovery and Treatment facility located in Unit 17 of the Linbro Business Park, Sandton**
Report Date	14 May 2026
EAP Details	**LexEco (Pty) Ltd** 11 Alice Lane Building 3, 5th Floor Sandton, Johannesburg 2146 **Contact Person:** Riette Landsberg EAPASA Reg Nr: 2025/20547 Tel: 010 023 8543 Email: riette@lexeco.co.za
Applicant Details	**SGR Holdings (Pty) Ltd** Unit 17 at 7 Mastiff Road Linbro Business Park Sandton, 2090 **Contact Person:** Wayne Clancy Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@passa.co.za
Application Reference No:	**Not Yet Available**

1. INTRODUCTION AND PROJECT BACKGROUND

SGR Holdings (Pty) Ltd ("SGR Holdings") operates a small-scale e-waste management facility which specialise in the sourcing of printed circuit boards ("PCBs"), removed from used cell phones, computers, laptops and other electronics. Once received, the PCBs are manually inspected, screened and sorted by workers who remove unwanted fragments including glass, plastic and wiring that may still be present.

After sorting, components such as integrated circuit ("IC") chips, processors ("CPUs") memory chips and connectors are still attached to the circuit boards which cannot be manually removed due to strong bonds and solders that adhere these components to the substrate. SGR Holdings have therefore initiated an experimental trial using scientific ovens and dismantling machines to effectively separate valuable components from the PCBs.

The experimental trials have proven successful and in turn, SGR Holdings now propose to implement a full-scale e-waste recycling, recovery treatment operation based on the same approach. In order to do so, SGR Holdings propose to install additional scientific ovens chip disassembly machines in addition to specialised cutting machines to assist in the processing of larger fragments. Once operational, the facility will be able to operate at an increased capacity. The proposed expansion will allow SGR Holdings to accept a wider range of e-waste, inclusive of IT and telecommunication equipment (cell phones, laptops, computers, printers, routers, and tablets), consumer electronics (televisions, cameras, video and or audio equipment and gaming consoles), household appliances (microwaves, vacuum cleaners, electric kettles, and shavers, refrigerators washing machines dishwashers and electric ovens), tools and electrical toys for processing.

The proposed expansion and continued operation will be limited to the current warehouse (Unit 17) leased by SGR Holdings which forms part of the larger Linbro Business Park on Mastiff Road, Sandton. No new development will be required nor will the existing warehouse and or associated infrastructure need to be expanded beyond its existing footprint. 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**").

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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 suitably qualified 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

Riette Landsberg is a registered Environmental Assessment Practitioner with the Environmental Assessment Practitioners Association of South Africa (EAPASA), registration number 2025/20547. Riette holds an Honours degree in Environmental Sciences, obtained from North-West University in 2013.

With over 12 years of professional consulting experience in the South African legislative and regulatory environment, Riette has built a strong track record of translating complex environmental legislation into practical industry implementation.

Riette has successfully led and managed a range of environmental authorisation processes, including Full Scoping and Environmental Impact Assessment (EIA) processes, Basic Assessments, and Section 24G Rectification Applications in terms of the National Environmental Management Act (NEMA) and its associated regulations. She has compiled and implemented numerous Environmental Management Programmes (EMPr's) for projects across the manufacturing, mining, energy, and construction sectors, and

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has extensive experience supporting clients from the initial application phase through to on-site implementation and ongoing compliance management.

Riette's areas of expertise include impact assessment and scoping processes, Environmental Control Officer (ECO) functions, land management, licensing and permitting, water and waste management, air quality management and reporting, land contamination assessments, waste classification and management, public participation, and environmental monitoring, compliance audits and reporting.

Her academic foundation in the environmental sciences, combined with her extensive field and consulting experience, has equipped Riette with a sound and practical understanding of the natural environment. This underpins her professional approach across all project types, ensuring that assessments are conducted with scientific rigour, regulatory accuracy, and a commitment to sustainable outcomes.

2. SITE LOCATION AND DESKTOP ASSESSMENT

SGR Holdings currently operate from within an existing warehouse (Unit 17) which forms part of the larger Linbro Business Park which falls within the jurisdiction of the City of Johannesburg Metropolitan Municipality. The area surrounding operation comprises of many warehouses as well as a combination of light to medium industrial activities. Access to and from the site is facilitated via the N3 National Toll Route, taking exit 124 Sandton along the M60 towards Marlboro Drive. Using Starfield Drive, 3rd Road or Milkyway Avenue, access to Mastiff Road is gained, which leads directly to the Linbro Business park.

According to the City of Johannesburg's Zoning Scheme, the selected site and associated warehouse is zoned as "*Industrial 1*" which supports the current land use activities.

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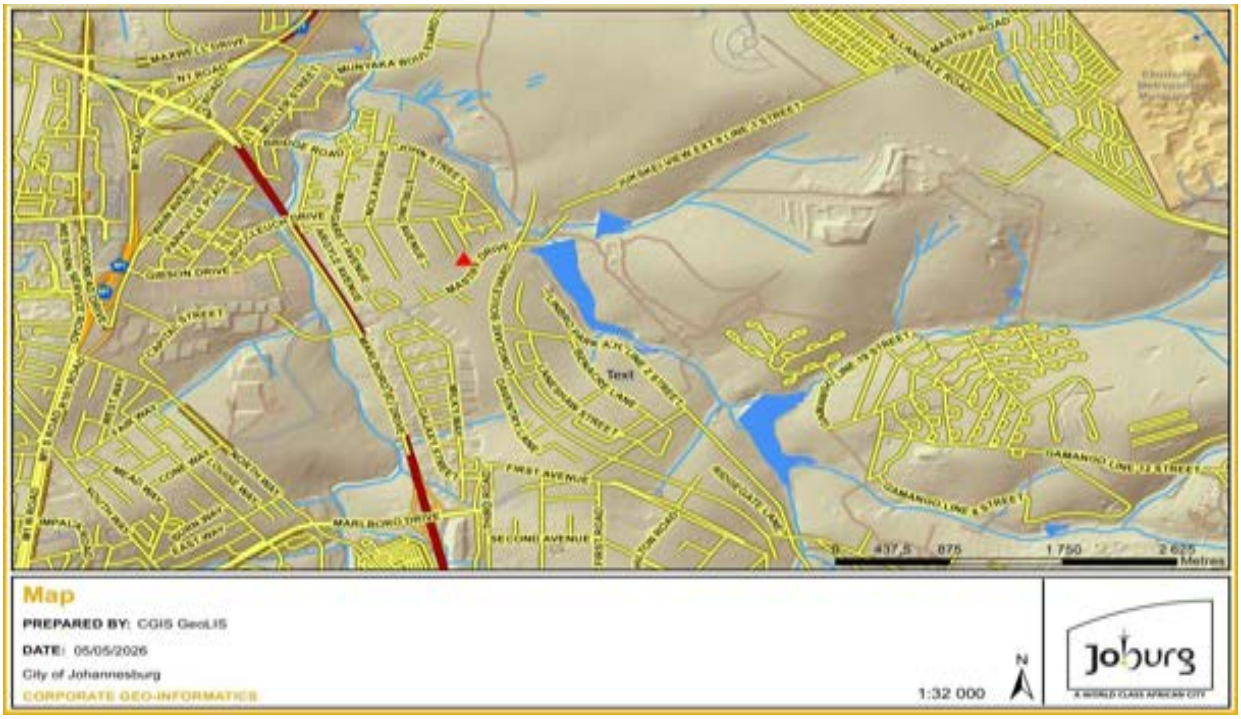

Figure 1: Site Location

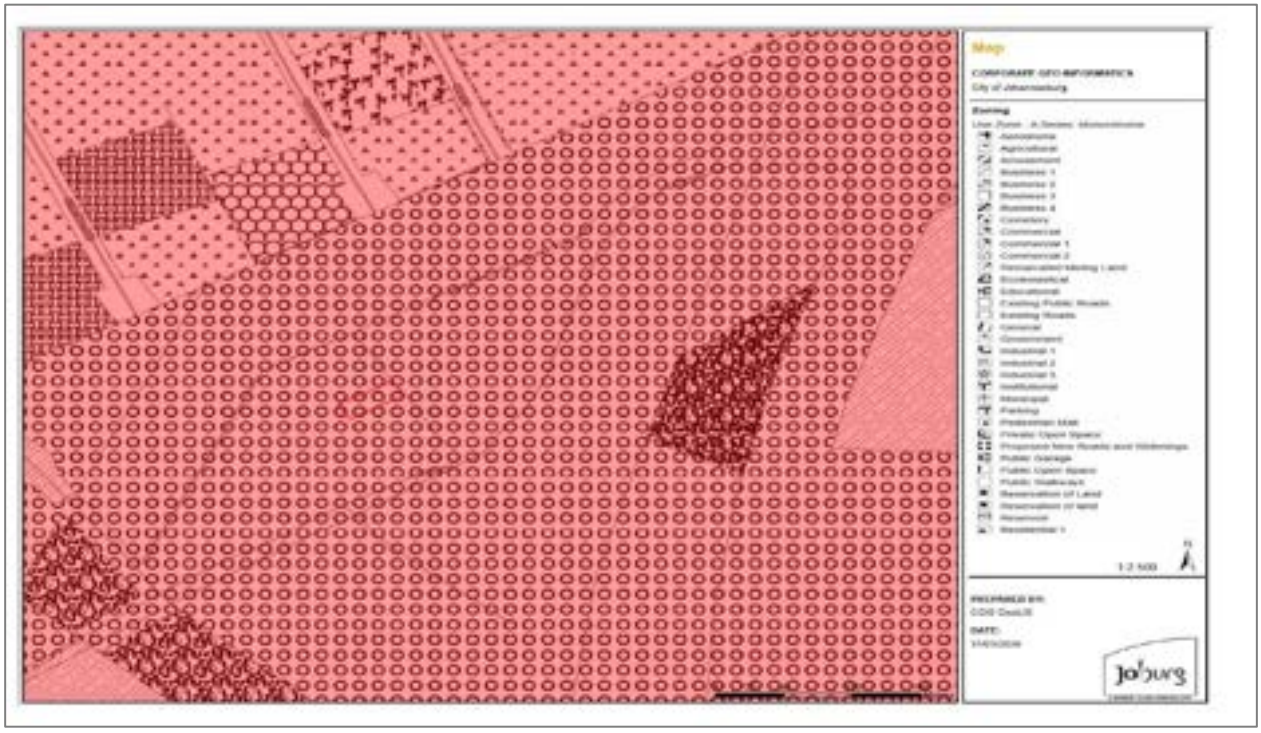

Figure 2: City of Johannesburg Zoning Map

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

Figure 3: Areial View of the SGR Holdings facility

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

Photo 1: Entrance to Unit 17 of the Linbro Business Park

Photo 2: Entrance to Unit 17 of the Linbro Business Park

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Photo 3: General view of Unit 17

Photo 4: Product Storage and dispatch area

Photo 5: View of operational areas

Photo 6: View of operational areas

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3. SCREENING TOOL IDENTIFIED SENSITIVITIES

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

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

Table 1: National Screening Tool Site Sensitivities

THEME	VERY HIGH SENSITIVITY	HIGH SENSITIVITY	*MEDIUM SENSITIVITY*	*LOW SENSITIVITY*
Agricultural Theme		X		
Animal Species Theme			X	
Aquatic Biodiversity Theme				X
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme		X		
Defense Theme			X	
Plant Species Theme				X
Terrestrial Biodiversity Theme	X			

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

3.1. Agricultural Theme Sensitivity

The Screening Tool identified the site as having a "*High*" sensitivity toward the Agricultural Theme.

The SGR Holdings operations are located within a pre-existing warehouse which forms part of an established industrial area. According to the City of Johannesburg Spatial Development Plan the site as well as surrounding area is also zoned as "*Industrial 1*". Land use in the area is characterised by large format warehouses for light industrial to logistical purposes. The existing land use for the site was therefore confirmed as industrial and not agricultural.

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

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

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3.2. Animal Species Sensitivity

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

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

Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
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 SGR Holdings 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 to engageable.	Low
Mammalia-Crocidura maquassiensis	Medium	The Makwassie musk shrew (*Crocidura maquassiensis*) is a small mole-like mammal in the family Soricidae. According to SANBI, not much is known about the habitats and ecology of this species. Records indicate that relevant specimens have been collected from a residential house as well as from a grassy mountainside in Matlehong. Other specimens have also been found on rocky or montane grassland, such as recently in the Soutpansberg Mountains. According to academic records, the Makwassie musk shrew's natural habitat has been described as ranging from rocky areas located at approximately 1 580m above sea level to montane grassland areas such as the Soutpansberg Mountains. In conclusion, habitat conditions associated with the Linbro Business Park is considered to be hostile and unsupportive to the needs of the Makwassie musk shrew.	Low

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Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
		The study site as well as surrounding area is fully developed with hard-surfaced industrial operations precinct with no rocky outcrops, natural substrate, or vegetative cover of any kind. Originally a smallholding and agricultural zone, the area has since transformed into a vibrant logistics and business precinct dominated by warehousing and distribution facilities, rendering it ecologically inhospitable to this habitat-sensitive species. In addition, no ecological corridors exist to facilitate movement of individuals toward the site, and the sealed warehouse environment of Unit 17 offers no foraging resources, shelter, or breeding substrate. The absence of suitable habitat, the significant geographic distance from any known population, and the fully urbanised character of the site make the presence of C. maquassiensis at this location extremely unlikely.	
Mammalia-Dasymys robertsii	Medium	Robert's shaggy rat (*Dasymys robertsii*) can be considered highly unlikely to be present at or around Unit 17, Linbro Business Park, on the basis of its strict habitat requirements, geographic distribution, and the character of the site. Members of the *Dasymys* genus are wetland habitat specialists, occurring in marshy areas with wet ground and thick vegetation, such as swamps and vleis. The Robert's shaggy is sporadically distributed in the lowveld of northern South Africa and Zimbabwe, and as a wetland specialist. The Robert's shaggy rat has more frequently been documented in the lowveld and northern provinces of South Africa, predominantly Limpopo and associated northern regions. The Linbro Business Park falls entirely outside this known distribution range and contains none of the wetland, marshy, or riverine habitat features on which the species depends. The species is a poor disperser, and wetland habitats are fragmented, making significant movement between populations unlikely. Furthermore, *D. robertsii* is rare and exists at low densities, with even sustained collection efforts in suitable habitats yielding very few individuals. The fully developed, impervious industrial environment of Linbro Business Park — with no wetlands, standing water, marsh vegetation, or natural substrate provides none of the ecological requirements of this species, and its presence at Unit 17 can therefore be considered extremely unlikely.	Low

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Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
Mammalia-Hydrictis maculicollis	Medium	The spotted-necked otter (*Hydrictis maculicollis*) can be considered highly unlikely to be present at or around Unit 17, Linbro Business Park, on the basis of its highly specialised aquatic ecology and the complete absence of suitable habitat at the site. The species is restricted to areas of permanent fresh water, specifically large rivers, lakes, dams, and swamps with plentiful fish. The Linbro Business Park is a densely developed industrial precinct situated along the N3 highway with no rivers, wetlands, dams, or riparian vegetation anywhere within or adjacent to the site. The defining ecological prerequisites for this species are entirely absent. Furthermore, the spotted-necked otter is highly adapted to aquatic life, with fully webbed paws, and appears clumsy on land, often not venturing further than 10 metres from the shore. The presence of *H. maculicollis* within vicinity to the proposed site is therefore be considered extremely unlikely.	Low
Mammalia-Ourebia ourebi ourebi	Medium	The presence of oribi (*Ourebia ourebi ourebi*) on site or within vicinity to the site is considered to be highly unlikely. In South Africa, the subspecies *O. o. ourebi* occurs extensively in grasslands in Mpumalanga, Eastern Cape, and KwaZulu-Natal provinces, with a few subpopulations in southern and northeastern Free State and southern Limpopo, and Gauteng. The proposed site, which forms part of the Linbro Business Park is situated in the urbanised industrial belt of Sandton, Gauteng which falls entirely outside this known range. The oribi occupies a variety of grassland habitats, from savannahs and floodplains to montane grasslands, all of which are completely absent from the proposed site and surrounds. As a medium-sized antelope requiring extensive, undisturbed open grassland, the oribi would be wholly incapable of persisting within, or moving through, a dense industrial park comprising hard-surfaced roads, warehouses, and active logistics operations. The presence of *O. o. ourebi* at Unit 17 can therefore be dismissed as not plausible.	Low
Invertebrate-Clonia uvarovi	Medium	*Clonia uvarovi* (Uvarov's Clonia) is a a predatory katydid which is endemic to the Highveld region of South Africa. Uvarov's Clonia is listed as Vulnerable under criterion B1, with an extent of occurrence of only approximately 5,000 km² and has been recorded in only five locations across Gauteng and Northwest Provinces. Critically, the species occurs in tall, woodland savannah. The Linbro Business Park is precisely the	Low

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Screening Tool Identified Species	Screening Tool Sensitivity Rating	Conclusion	Verified Sensitivity Rating
		type of fully urbanised, hard-surfaced industrial environment that represents the opposite of the tall woodland savannah habitat this species requires to thrive. Withs no natural vegetation, grassland substrate, or woody savannah cover of any kind within or immediately surrounding the site, the presence of the Uvarov's Clonia is considered to be highly unlikely.	

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

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

3.3. Aquatic Biodiversity Theme

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

The proposed expansion and operation of the waste management facility will be limited to the boundaries of the existing warehouse located on concreted surfaces which form 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 are equipped with an existing, engineered stormwater drainage system that is designed to manage runoff from the developed site. Stormwater is conveyed via formal infrastructure to the municipal/industrial stormwater network. No modifications to the stormwater system will be required.

No natural hydrological features such as rivers, wetlands, floodplains, or drainage lines are present on site or within direct vicinity to the warehouse and industrial property. The proposed site as well as local receiving environment is therefore not considered hydrologically sensitive.

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

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

The SGR Holdings operations are located in the Linbro Business Park 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.

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

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

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

3.5. Civil Aviation Theme

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

The "High" rating assigned by the National Screening tool has been contributed to the fact that the proposed project site is located 8.26 km southwest from Grand Central Airport and 15.68 km northwest from OR Tambo International Airport.

The current waste management operations 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 proposed expansion of the waste recycling, recovery and treatment operations as being applied for. The proposed project will not encroach into airspace and will pose no risk to ongoing aeronautical operations.

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

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

3.6. Relative Defence Theme

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

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

The site sensitivity verification disputes the Screening Tool's "*Medium*" 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. Plant Species Theme

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

Sandton falls within the Egoli Granite Grassland vegetation type as classified within the Grassland Biome of South Africa. This vegetation community is characterised by open grassland dominated by perennial grasses with scattered shrubs and very limited natural tree cover under undisturbed conditions.

Historically, the area supported species-rich Highveld grassland vegetation adapted to seasonal summer rainfall, periodic fire, and grazing processes. Common grasses include species such as Themeda triandra (red grass), while herbaceous species and geophytes contribute to biodiversity during the summer growing season.

Due to extensive urbanisation and industrial development within the greater Sandton and Johannesburg metropolitan area, much of the original natural vegetation has been transformed or fragmented by roads, buildings, commercial infrastructure, and residential expansion. Remaining vegetation within the area is therefore largely modified and consists of landscaped areas, secondary grassland, alien invasive species, and ornamental vegetation associated with urban environments.

Natural ecological areas are generally confined to open spaces, drainage lines, wetlands, and undeveloped portions of the landscape, where remnant grassland vegetation may still occur.

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Figure 4: Area Vegetation Map

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

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

3.8. 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.

The proposed site is fully transformed and supports no natural habitat or indigenous vegetation. Located outside the realistic range and habitat requirements of all flagged sensitive species and embedded within a pervasively urbanised landscape matrix devoid of ecological connectivity. The proposed e-waste operations introduce no new land disturbance and are confined entirely within an existing warehouse. The "very high" sensitivity is related to the Screening Tool's spatial resolution and design and available data and

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frameworks. The site site-specific evidence presented in this assessment therefore confirms the existing state of the site and associated land use, therefore disputing the screening tools sensitivity rating.

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.

The proposed expansion of the 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 G: Site Photos

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Photo 1: External View of Unit 17

Photo 2: Unit 17 External View of Unit 17

Photo 3: Work Stations – North east view

Photo 4: General Overview of Operations – East view

Photo 5: Work Stations – West view

Photo 6: Product Collections – South -west view

Photo 7: Existing Scientific Ovens – North view

Photo 8:Existing Scientific Ovens – North view

Photo 9: Central view – North -west view

Photo 10: Product Storage - ready for dispatch – South-west view

Photo 11: Central view of operations – South-west

Photo 12: Work stations -West view

Photo 13: North View – south-east view

Photo 14: East view