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Draft Environmental Impact Report

South Group Recycling (Pty) Ltd

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

Application Ref: 12/9/11/L260310115340/9/N

Report Date: 12 June 2026

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Report Title	Draft Environmental Impact Report in support to the Waste Management License Application for the Recycling, Recovery and Treatment of Hazardous Waste by South Group Recycling (Pty) Ltd, located in Montague Gardens Cape Town
Report Date	12 June 2026
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Application Reference No:	12/9/11/L260310115340/9/N



EXECUTIVE SUMMARY

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

➤ Project Description

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

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

➤ Legal and Regulatory Requirements

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

Category B of GN 921 states that;

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

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

Table 1: GN 921 Listed Activities Triggered

GN 921 Listed Activity	Description
Category B Activity 2	The reuse or recycling of hazardous waste in excess of 1 ton per day, excluding reuse or recycling that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 3	The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 4	The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment
Category B Activity 10	The construction of a facility for a waste management activity listed in Category B of this Schedule (not in isolation to associated waste management activity).

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

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

The scoping process has been completed. The final scoping report in support of this application was approved by the competent authority on the 4th May 2026 (**Annexure J**). This Draft EIR has been compiled in line with the requirements of GN 982.

➤ **Need and Desirability**

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

➤ Alternatives Considered

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

➤ Specialist Studies

Based on the nature of the site and proposed activities, no specialist studies are proposed. A motivation for exclusion is provided in **Table 10** of this report. A site visit was also undertaken by the appointed EAP, and findings summarised in a site verification report, refer to **Annexure G**. Impacts associated with the proposed project have been assessed and the findings summarised in the impact tables attached to this report under **Annexure K**. Mitigation measures were assigned with the aim of avoiding and or reducing the risk of impact on the receiving environment and surrounding community. All impacts as well as assigned mitigation measures are included in the Draft EMPr attached to this report under **Annexure L**.

➤ Public Participation

A public participation process, as aligned with the requirements of NEMA and Section 6 of the EIA Regulations is currently underway. Interested and Affected Parties (I&APs), identified during the scoping report have again been notified of the ongoing application and availability of the Draft Environmental Impact Report (“**EIR**”) and Environmental Management Program (“**EMPr**”). Notification was facilitated by means of written notices, a newspaper advertisement, site notices and the circulation of a Background Information Document. The EIR will also be made available to the public for review and comment in both hard copy and electronic format. Comments and responses received during the Draft EIR Phase will be documented, and these records included in the Final EIR under **Annexure C**.

➤ Reasoned Opinion of the EAP

Based on the findings of the impact assessment, the EAP is of the opinion that the proposed project be approved. No significant adverse impacts have been identified as the significance of all impacts post-mitigation are either Low or Very Low. In addition, no impacts are anticipated to cause irreplaceable loss of resources. The proposed projects support waste minimisation efforts by diverting waste away from landfill whilst also supporting local communities by generating sustainable employment opportunities.



TABLE OF CONTENTS

I.	CONTENT OF AN ENVIRONMENTAL IMPACT REPORT IN ACCORANCE WITH APPENDIX 3 OF GN 982..	18
1.	INTRODUCTION AND BACKGROUND.....	22
2.	KEY ROLE PLAYERS.....	23
2.1.	Details of the Applicant.....	23
2.2.	Details of the Environmental Assessment Practitioner(s).....	23
2.3.	Environmental Assessment Practitioners' Experience	24
2.4.	Independence of Environmental Assessment Practitioner.....	25
3.	PROPERTY DESCRIPTION AND SITE LOCATION	25
3.1.	Property Details	25
3.2.	Property Zoning	25
3.3.	Surveyor General Code	25
3.4.	Site Location	26
4.	PROCESS DESCRIPTION.....	29
4.1.	Existing Operations.....	29
4.2.	Proposed Activities	29
4.3.	Existing Infrastructure Associated with the Site	30
5.	LEGISLATIVE CONTEXT	34
5.1.	Constitution of the Republic of South Africa (Act 108 of 1996)	34
5.2.	National Environmental Management Act (No. 107 of 1998), as amended	34
5.3.	NEMA EIA Regulations (GNR 982) (as amended)	35
5.3.1.	Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (GNR 320).....	36

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5.4.	National Environmental Management Waste Act (No. 59 of 2008) (as amended)	37
5.4.1.	National Waste Information Regulations (13 August 2012)	37
5.4.2.	NEMWA Listed Activities	37
5.4.3.	National Norms and Standards	38
5.4.4.	NEMWA Regulations Regarding the Control of the Import and Export of Waste (GNR 42175)	39
5.4.5.	Basel Convention on the Control of Trans-boundary Movements of Hazardous Waste (22 March 1989)	39
5.4.6.	Draft National Policy for the Management of Waste Electrical and Electronic Equipment (GNR 4983, 2024)	40
5.4.7.	National Waste Management Strategy (NWMS) 2020	40
5.5.	National Environmental Management: Air Quality Act (Act 39 of 2004) ("NEMAQA")	41
5.6.	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)	43
5.7.	The National Water Act (No. 36 Of 1998)	43
5.8.	The National Heritage Resources Act (No. 25 Of 1999)	44
5.9.	Civil Aviation Act (No. 13 of 2009)	45
5.10.	City of Cape Town Integrated Development Plan	45
5.11.	Municipal Spatial Development Framework (MSDF) and the Blaauwberg District Plan	46
5.12.	City of Cape Town Air Quality Management By-Law (2016, as amended)	48
6.	NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES	49
6.1.	Electronic Waste	49
7.	REASONABLE AND FEASIBLE ALTERNATIVES CONSIDERED	70
7.1.	No-Go Alternative	70
7.2.	Alternative Locations	71



7.3.	Alternative Technologies.....	72
7.4.	Alternatives in terms of Scheduling and Timing.....	73
7.5.	Alternatives in terms of Scale and Magnitude	73
7.6.	Conclusion to the Alternatives Considered	73
8.	DESCRIPTION OF THE BASELINE ENVIRONMENT	74
8.1.	Climate	74
8.1.1.	Mean Monthly Wind Direction and Speed.....	74
8.2.	Hydrology.....	75
8.3.	Topography.....	75
8.4.	Geology and Soils.....	76
8.5.	Vegetation	77
8.6.	Socio-Economic	78
8.7.	Site Verifications.....	80
8.7.1.	Agriculture and Land Use.....	80
8.7.2.	Terrestrial Biodiversity	83
8.7.3.	Surface Water and Wetlands	83
8.7.4.	Palaeontology, Archaeology and Cultural Heritage.....	84
8.7.5.	Civil Aviation and Defence	84
8.7.6.	Noise	85
8.7.7.	Traffic.....	85
8.7.8.	Air Quality.....	85
8.8.	Specialists Studies.....	86



8.8.1. Specialist Studies.....	87
9. PLAN OF STUDY FOR THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS	94
9.1. Assessment Methodology	94
10. IDENTIFIED IMPACTS AND PROPOSED MITIGATION MEASURES.....	98
10.1. Environmental Assessment Outcomes - Identified Aspects and Impacts.....	98
10.2. Proposed Mitigation Measures	100
10.3. Impact ratings After Mitigation Measures have been Applied	101
11. ENVIRONMENTAL IMPACT ASSESSMENT.....	101
11.1. Environmental Impact Assessment – Construction Phase.....	102
11.2. Environmental Impact Assessment – Operational Phase.....	105
11.3. Environmental Impact Assessment – Decommissioning Phase	110
11.4. Environmental Impact Assessment – No-Go Alternative (Rejection of WML application and continuation of operations as is)	113
11.5. Environmental Impact Assessment –Alternative Location	116
11.6. Environmental Impact Assessment –Alternative Technologies.....	119
11.7. Specialist Studies and Assessments	124
12. CUMULATIVE IMPACTS	124
13. ENVIRONMENTAL IMPACT STATEMENT.....	124
13.1. Deviations from the Approved Scoping Report and Plan of Study	124
13.2. Aspects for inclusion as conditions of the Waste Management License.....	124
14. REASONED OPINION OF THE EAP AS TO WHETHER THE ACTIVITY SHOULD OR SHOULD NOT BE AUTHORISED.....	125
15. PERIOD FOR WHICH THE AUTHORISATION IS REQUIRED	125



16.	PUBLIC PARTICIPATION.....	126
16.1.	Identification and Registration of I&AP's	126
16.2.	Newspaper Advertisements	130
16.3.	Site Notices	130
16.4.	Written Notices and Background Information Document (BID).....	130
16.5.	Circulation of the Draft Scoping Report.....	130
16.6.	Comments and Responses	130
17.	EIA PROCESS.....	131
18.	DECLARATION OF ENVIRONMENTAL ASSESSMENT PRACTITIONER	132
19.	CONCLUSION AND RECOMMENDATIONS.....	133

LIST OF TABLES

Table 1:	GN 921 Listed Activities Triggered	4
Table 2:	Applicant Details	23
Table 3:	EAP Details.....	23
Table 4:	Site Coordinates	26
Table 5:	NEMWA Listed Activities Triggered	38
Table 6:	Need and Desirability Considerations	50
Table 7:	Site Selection Matrix.....	72
Table 8:	Demographic Information for City of Cape Town.....	79
Table 9:	National Screening Tool Site Sensitivities	87
Table 10:	Motivation for Exclusion of Specialist Studies Identified by the National Screening.....	88
Table 11:	Risk Classification	95



Table 12: Marks Awarded to Duration	95
Table 13: Marks Awarded for Probability.....	96
Table 14: Marks Awarded to Extent.....	96
Table 15: Marks Awarded to Severity	96
Table 16: Marks Awarded to Mitigation	98
Table 17: Degree to which an Impact can be Reversed	98
Table 18: Identified Impacts.....	99
Table 19: Impact Assessment - Construction Phase.....	102
Table 20: Impact Assessment – Operational Phase.....	105
Table 21: Impact Assessment – Operational Phase.....	110
Table 22: Impact Assessment – No-Go Alternative.....	113
Table 23: Impact Assessment – Alternative Location	116
Table 24: Impact Assessment – Alternative Technologies	119
Table 23: IAP Register (<i>Restricted</i>).....	128

LIST OF FIGURES

Figure 1: South Group, Cape Town Zoomed Locality	27
Figure 2: South Group, Cape Town Locality Map (1:50 000).....	28
Figure 3: Map Showing Existing Water Network (COCT, Water and Sanitation Directorate Technical Services.....	32
Figure 4: Map showing existing sewer lines and Connections (COCT, Water and Sanitation Directorate Technical Services	32
Figure 5: Waste Hierarchy	41



Figure 6: SDF Map 5D Extract (City of Cape Town Spatial Planning and Environment Directorate: Urban Planning and Design Department)	46
Figure 7: Mean temperatures and precipitation (Meteoblue, 2024)	74
Figure 8: Montague Gardens, Cape Town Annual Wind Rose.....	75
Figure 9: South Group Recycling, Cape Town Topographic Map.....	76
Figure 10: Area Geology and Soil Composition	77
Figure 11: Area Vegetation	78
Figure 12: Aerial View of South Group Cape Town.....	81
Figure 13: Property Zoning according to the COCT SDF	81
Figure 14: Montague Gardens and Surrounds Land Use Map	82
Figure 15: Area Hydrology, South Group, Cape Town.....	84
Figure 16: Mitigation Hierarchy	97
Figure 17: Full Scoping EIA Process Flow.....	131



ANNEXURES

Annexure A: EAP Qualifications and CV	134
Annexure B: Site Maps	135
Annexure C: Public Participation.....	136
Annexure D: Proof of Application for Registration in terms of the National Norms and Standards	137
Annexure E: Copy of Exporter Permit.....	138
Annexure F: National Screening Tool Report	139
Annexure G: Site Verification Report	140
Annexure H: Site Photos	141
Annexure I: Letter to DFFE	142
Annexure J: Scoping Report Approval Letter	143
Annexure K: Impact Assessment Tables	144
Annexure L: Draft EMPr.....	145
Annexure M: Draft Emissions Management Plan	146

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	Environmental Management Plan
EMPr	Environmental Management Programme Report
ERP	Emergency Response Plan
ESA	Ecological Support Areas
ESIA	Environmental Social Impact Assessment
GIS	Geographic Information Systems
GN	Government Notice
GNR	Government Notice Regulations
I&APs	Interested and Affected Parties
km	Kilometre
m	metre
m/d	Meter per day
NAEIS	National Atmospheric Emission Inventory System
NEM:AQA	National Environmental Management: Air Quality Act
NEM:WA	National Environmental Management: Waste Act
NEMA	National Environmental Management Act
NGOs	Non-Governmental Organisations
NWA	National Water Act
PPE	Personal Protective Equipment
PPP	Public Participation Process
PM	Particulate Matter
SAHRA	South African Heritage Resources Agency
SDF	Spatial Development Plan
t/m	Tons per month
t/m³	Tons per cubic metre
µg/m³	micrograms per cubic meter
WML	Waste Management License
WUL	Water Use License

TERMS AND DEFINITIONS

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

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

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

I. CONTENT OF AN ENVIRONMENTAL IMPACT REPORT IN ACCORDANCE WITH APPENDIX 3 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 3 of GNR 326) and the relevant sections in the report where these are addressed.

An Environmental Impact 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 3 CONTENT OF THE ENVIRONMENTAL IMPACT REPORT		REFERENCE IN REPORT
a)	Details of;	
	i) The EAP who compiled the report; and	Section 2.2
	ii) The expertise of the EAP, including a Curriculum Vitae	Section 2.2
b)	The location of the activity, including-	
	i) The 21-digit Surveyor code for each cadastral land parcel;	Section 3.3
	ii) Where available, the physical address and farm name	Section 3.1
	iii) Where the required information in terms of (i) and (ii) is not available, the coordinates of the boundary of the property.	Section 0
c)	A plan which locates the activities applied for at an appropriate scale, or, if it is-	
	i) A linear activity, a description of the corridor in which the proposed activity or activities is to be undertaken; or	N/A
	ii) On land where the property has not been defined, the coordinates within which the activity is to be undertaken.	Section 0
d)	A description of the proposed activity, including-	
	i) All listed and specified activities triggered;	Section 5
	ii) A description of the activities to be undertaken, including associated structures and infrastructure;	Section 4.2
e)	A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;	Section 5
f)	A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred development footprint within the approved site as contemplated in the accepted scoping report;	Section 6

GN R982, APPENDIX 3 CONTENT OF THE ENVIRONMENTAL IMPACT REPORT		REFERENCE IN REPORT
g)	A motivation for the preferred development footprint within the approved site as contemplated in the accepted scoping report;	Section 7
h)	A full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including:	
	i) Details of the development footprint alternatives considered;	Section 7
	ii) Details of the public participation process undertaken in terms of regulation 41 of the regulations, including copies of the supporting documents and inputs;	Section 16
	iii) A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;	Section 16
	iv) The environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Section 8
	v) The impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts <ul style="list-style-type: none"> aa. Can be reversed; bb. May cause irreplaceable loss of resources; and cc. Can be avoided, managed or mitigated; 	Section 10
	vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;	Section 9
	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 7
	viii) The possible mitigation measures that could be applied and level of residual risk;	Section 10
	ix) If no alternative development footprints for the activity were investigated, the motivation for not considering such; and	Section 7
x) A concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted scoping report;	Section 7	
i)	A full description of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity, including:	Section 9
	i) A description of all environmental issues and risks that were identified during the environmental impact assessment process; and	Section 10

GN R982, APPENDIX 3 CONTENT OF THE ENVIRONMENTAL IMPACT REPORT		REFERENCE IN REPORT
	ii) An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures	Section 10
j)	An assessment of each identified potentially significant impact and risk, including-	
	i) Cumulative impacts;	Section 10
	ii) The nature, significance and consequences of the impact and risk;	Section 10
	iii) The extent and duration of the impact and risk;	Section 10
	iv) The probability of the impact and risk occurring;	Section 10
	v) The degree to which the impact and risk can be reversed;	Section 10
	vi) The degree to which the impact and risk may cause irreplaceable loss of resources; and	Section 10
	vii) The degree to which the impact and risk can be mitigated;	Section 10
k)	Where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report;	N/A
l)	An environmental impact statement which contains-	
	i) A summary of the key findings of the environmental impact assessment;	Section 19
	ii) A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred development footprint on the approved site as contemplated in the accepted scoping report indicating any areas that should be avoided, including buffers; and	Section 8 Annexure B
	iii) A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;	Section 7
m)	Based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the EMP as well as for inclusion as conditions of authorisation	Section 10
n)	The final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment;	Section 7
o)	Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;	Section 10
p)	A description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;	Section 6

GN R982, APPENDIX 3 CONTENT OF THE ENVIRONMENTAL IMPACT REPORT		REFERENCE IN REPORT
q)	A reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;	Section 19
r)	Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised;	N/A
s)	An undertaking under oath or affirmation by the EAP in relation to-	
	i) The correctness of the information provided in the reports;	Section 18
	ii) The inclusion of comments and inputs from stakeholders and I&APs;	Section 16
	iii) The inclusion of inputs and recommendations from the specialist reports where relevant; and	Section 16
	iv) Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties	Section 16
t)	-	
u)	An indication of any deviation from the approved scoping report, including the plan of study, including-	N/A
	i) any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and	N/A
	ii) a motivation for the deviation;	N/A
v)	Any specific information that may be required by the competent authority; and	Section 19
w)	Any other matters required in terms of section 24(4)(a) and (b) of the Act.	N/A



1. INTRODUCTION AND BACKGROUND

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

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

In recent years the electronic market has boomed, resulting in more electronic waste being generated than ever before. In response the need for responsible and sustainable management of electronic waste has increased. South Group want to capitalise on the opportunity by increasing their current export volumes. In order to undertake the planned recycling, recovery and treatment activities South Group Recycling will install relevant equipment such as horizontal crushers, hammer mills, vacuum filters, cone mixers and scientific ovens to assist in optimal processing of approved waste streams. All operations will be located within the existing warehouse located at 2 Warbler Close, Montague Gardens, Cape Town. No extension, alteration or modification to the warehouse and associated infrastructure will be required other than the installation of equipment required to undertake the proposed recycling, recovery and or treatment activities.

2. KEY ROLE PLAYERS

2.1. Details of the Applicant

Details of the Applicant and Responsible Contact Person are provided in **Table 2**.

Table 2: Applicant Details

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

2.2. Details of the Environmental Assessment Practitioner(s)

Details and expertise of the EAP who prepared the EIR is provided in Table 3 below, and a copy of their Curriculum Vitae is appended in **Annexure A** of this report.

Table 3: EAP Details

Appointed EAP:	<i>Riette Landsberg (Registered EAP)</i>
EAPASA Reg Nr:	2025/20547
Tel:	076 099 1290
Email:	riette@lexeco.co.za
Address:	11 Alice Lane, Building 3, 5 th Floor, Sandton, Johannesburg, 2196
Co-Author:	<i>Shaylen Naidoo (Candidate EAP)</i>
EAPASA Reg Nr:	2024/8707
Tel:	079 975 8942
Email:	shaylen@lexeco.co.za
Address:	11 Alice Lane, Building 3, 5 th 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.

➤ Shaylen Naidoo

Shaylen is a registered environmental scientist with the South African Council for Natural Scientific Professionals (Reg Nr: 130920). Shaylen is also registered as a Candidate EAP with the with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (Reg Nr 2024/8707).

After completing his studies and obtaining an Honours Degree in Environmental Technology and Applied Sciences from the University of Pretoria, Shaylen has worked as an environmental scientist, GIS specialist, and climate data analyst. With a strong technical background in ArcGIS Pro, Python scripting, statistical analysis, air dispersion modelling, LiDAR data processing, and water-use GIS, Shaylen is equipped in delivering technically rigorous environmental assessments, geospatial analysis, and reporting across the mining, energy, industrial, water resource, and climate sectors in South Africa.

Shaylen also has experience in managing and compiling Environmental Impact Assessments (EIAs), Basic Assessments, Waste Management Licence applications, and environmental compliance documentation in accordance with the National Environmental Management Act (NEMA) and related legislation. Shaylen



possesses a strong academic foundation supported by practical industry experience in environmental assessment and regulatory processes.

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

2.4. Independence of Environmental Assessment Practitioner

LexEco (Pty) Ltd is not in any manner affiliated to the applicant. LexEco (Pty) Ltd also does not have any interest in secondary developments that may arise out of the authorisation of the proposed facility.

LexEco (Pty) Ltd as the appointed EAP meets the requirements for independence as none of the project team members has and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the EIA Regulations, 2014. LexEco (Pty) Ltd will also not have vested interest in the proposed activity proceeding; and also, has no, and will not engage in conflicting interests in the undertaking of the activity.

3. PROPERTY DESCRIPTION AND SITE LOCATION

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

3.1. Property Details

South Group Recycling currently operate from within an existing warehouse, namely Unit 2 of the Marconi Estate, located at 2 Warbler Close, Montague Gardens in the Northern suburbs of Cape Town.

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

3.2. Property Zoning

The site is zoned as Industrial which is in line with the existing operations of the waste storage and transfer operations as well as the proposed waste recycling, recovery and treatment activities applied for. The surrounding land use is also industrial in nature, dominated by light to moderate industrial activities and warehousing used as distribution centres.

3.3. Surveyor General Code

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

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

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

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

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

Refer to Table 3 below for the coordinates of the site.

Table 4: Site Coordinates

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

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

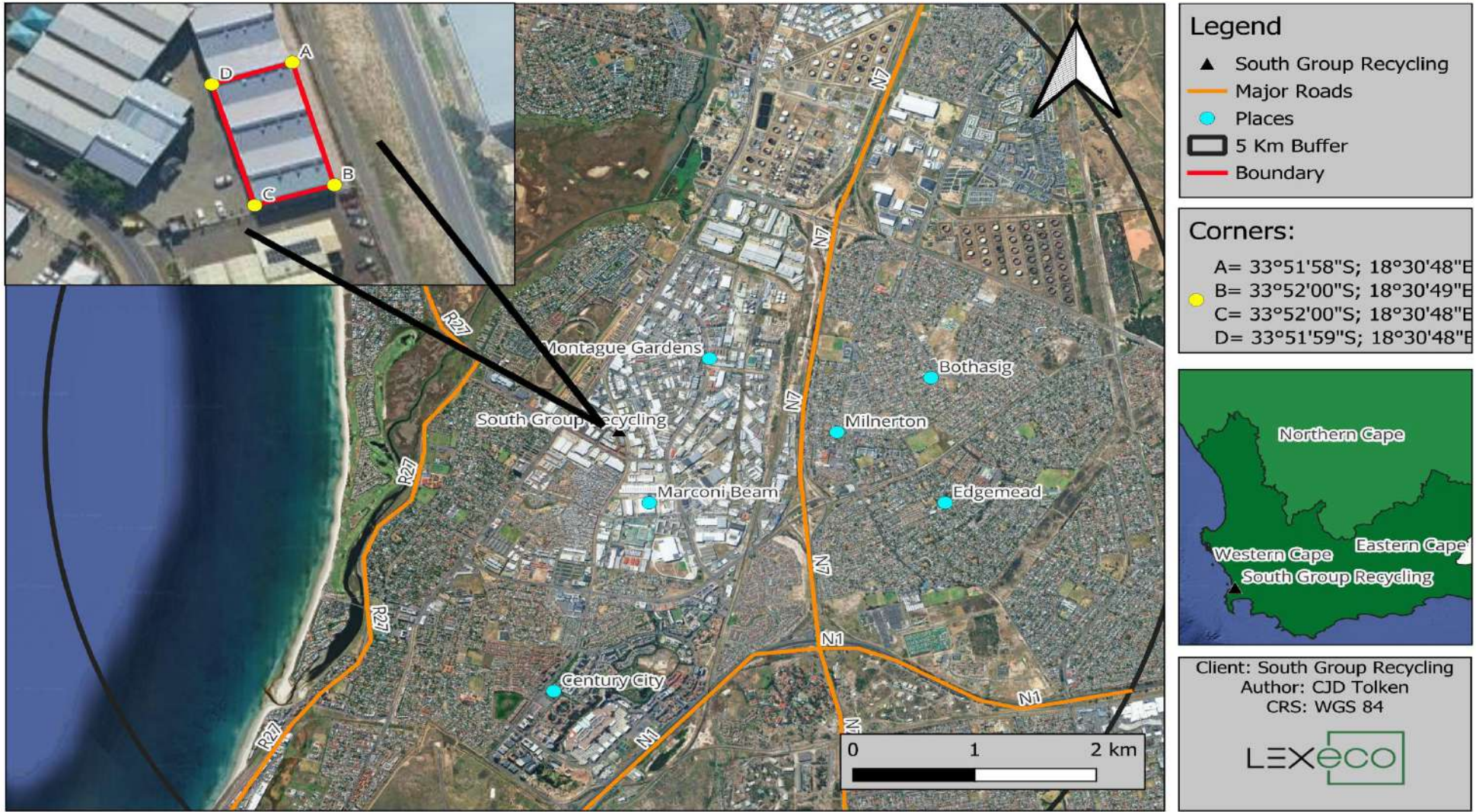


Figure 1: South Group, Cape Town Zoomed Locality



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



4. PROCESS DESCRIPTION

4.1. Existing Operations

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

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

4.2. Proposed Activities

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

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

➤ *E-Waste*

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

- Circuit boards and or any components containing precious metals will be subject to additional crushing and screening.
 - Following initial crushing and screening, circuit boards will be loaded into a scientific oven and backed at low temperatures for a minimum of 24 hours before being allowed to cool before being fed into a manual screen which separates the different components.
 - Once crushed and screened, final product is collected in bulk bags and sealed for export.
- **Spent Catalytic Convertors**
- Spent Catalytic Convertors are received in bulk bags which are transported to the South Group Recycling, Cape Town facility via truck.
 - Once received, workers manually sort through each load and pick out any unwanted or approved materials.
 - The outer metal casing of the converter is removed, a process called "*de-caning*".
 - The inner ceramic honeycomb substrate is extracted.
 - The honeycomb is then crushed into a fine powder using mechanical crushers and grinding mills.
 - The outer metal casings are collected in a skip or bulk bags and sold to local recyclers or scrap dealers.
 - The fine powder generated from the crushing and milling process is collected in bulk bags, sealed and exported for further refining and processing.

4.3. Existing Infrastructure Associated with the Site

➤ **Roads**

Access to the facility is gained via Warbler Cl Road which links up to Longclaw Drive. The M87 runs parallel to the warehouse property's eastern boundary.

➤ **Security**

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

➤ **Access Gates**

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



➤ **Existing Infrastructure**

The operational surface area of the site is concreted. The entire operation currently undertaken by South Group Recycling is housed within a single warehouse, namely Unit 2 of the Marconi Estate in Milnerton, Cape Town and is equipped with a single entrance.

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

Spent catalytic convertors are also accepted. Once received, they are de-canned and the inner ceramic honeycomb substrate extracted before being crushed into a powder. The powder is then collected and sealed in bulk bags before being diverted to the storage area prior to export.

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

➤ **Storm Water Management**

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

➤ **Electricity**

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

➤ **Water Supply and Use**

No water will be used in the industrial process. Water use will be limited to domestic purposes which in turn will rely on existing municipal supplies and infrastructure.

The City of Cape Town, Water and Sanitation Directorate in association with the Water Demand Management Branch and Bulk Wastewater Branch, confirmed that there are no bulk water mains near the proposed application site and that there is an existing 150mm diameter water main located along Warbler Close which currently supplies water to the site. It was also confirmed that there is an existing 150mm diameter sewer main located along Warbler Close which currently services this site.



Figure 3: Map Showing Existing Water Network (COCT, Water and Sanitation Directorate Technical Services)

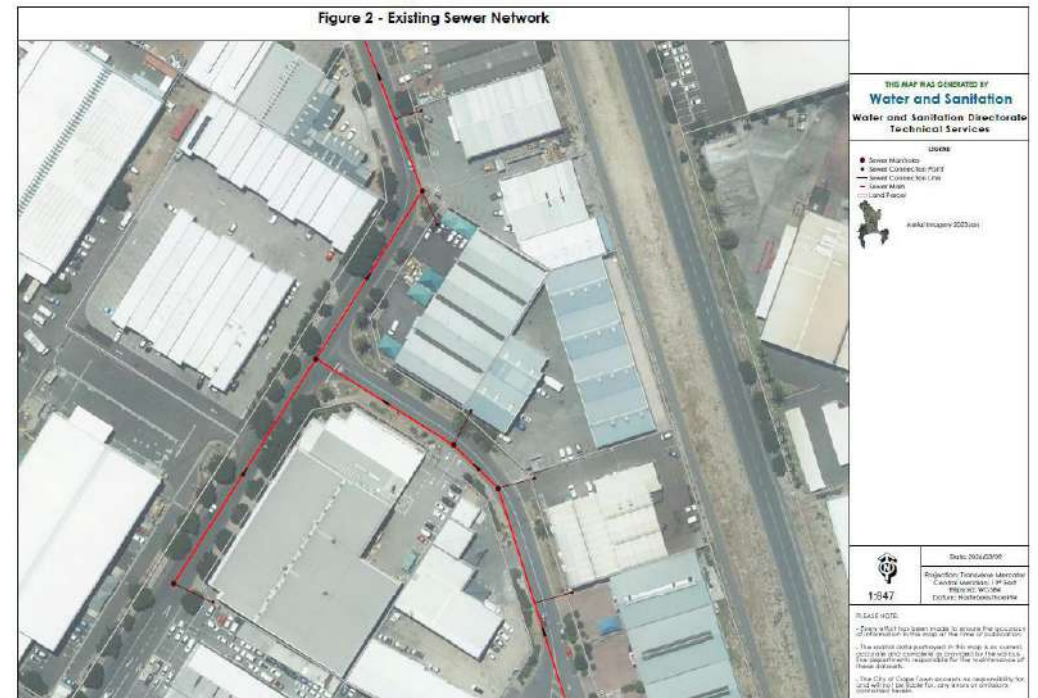


Figure 4: Map showing existing sewer lines and Connections (COCT, Water and Sanitation Directorate Technical Services)

➤ **Waste Management**

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

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

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

The South Group Recycling, Cape Town operations are committed to reducing waste as far as reasonably possible.

Basic waste management principles are implemented by the facility to ensure and promote a safe and hygienic working environment. Appropriate waste management measures are implemented in order to limit waste generation and to promote waste recycling, recovery and re-use where possible.

General waste which cannot be re-used, recycled or recovered, such as food waste and or food packaging is collected in allocated bins and or bags and set out for collection by municipal services.

Alternative waste streams generated by daily operations may include ferrous and non-ferrous scrap, cardboard and paper waste, plastic, glass and packaging waste. Each waste stream is collected separately and submitted or transferred to approved waste management facilities or service providers for recycling, recovery, re-use or alternatively safe disposal if applicable.

No construction other than the installation of required equipment and machinery needed for the proposed recycling, recovery and treatment of e-waste is anticipated at this time. No extension or alterations to the existing infrastructure will be required. However, should building rubble be generated during any phase of the operation, all waste streams will be, managed in accordance with applicable waste management practices, guides and regulations as applicable.

5. LEGISLATIVE CONTEXT

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

➤ Section 24 – Environment

“Everyone has the right -

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

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

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

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

➤ Section 2: Environmental Management Principles

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

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

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

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

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

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

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

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

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

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

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

The NEMA EIA Regulations, as amended, include three (3) listing notices, published in conjunction with the regulations -

1. **Listing Notice 1** (Government Notice R. 983 in Government Gazette 38282 of 4 December 2014) (as amended) 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) (as amended) 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) (as amended) identifies activities that will only require an environmental authorisation through a basic assessment process if the activity is located within 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 set out under 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 generated for the proposed project. The following environmental themes are applicable to the proposed South Group Recycling, Cape Town facility;

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

Based on the outcomes of the site verification, the EAP is of the opinion that no specialist assessments are required. Refer to **Section 8.8.1** of this report for a full discussion and outcomes based on the site verification.

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

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

5.4.1. National Waste Information Regulations (13 August 2012)

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

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

5.4.2. NEMWA Listed Activities

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

Category A of GN 921 states that;

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

Category B of GN 921 states that;

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

➤ Listed Activities Triggered

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

Table 5: NEMWA Listed Activities Triggered

GN 921 Listed Activity	Description
Category B Activity 2	The reuse or recycling of hazardous waste in excess of 1 ton per day, excluding reuse or recycling that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 3	The recovery of waste including the refining, utilisation, or co-processing of the waste at a facility that processes in excess of 100 tons of general waste per day or in excess of 1 ton of hazardous waste per day, excluding recovery that takes place as an integral part of an internal manufacturing process within the same premises.
Category B Activity 4	The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment
Category B Activity 10	The construction of a facility for a waste management activity listed in Category B of this Schedule (not in isolation to associated waste management activity).

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

The scoping process in support to the application has been completed. The Final Scoping Report in support of this application was approved by the DFFE on the 4th May 2026 (**Annexure J**). This Draft EIR has been compiled in line with the requirements of GN 982.

5.4.3. National Norms and Standards

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

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

➤ GN 921 - Category C

Storage of Waste

- 1) *"The storage of general waste at a facility that has the capacity to store in excess of 100m³ of general waste at any one time, excluding the storage of waste in lagoons or temporary storage of such waste."*
- 2) *"The storage of hazardous waste at a facility that has the capacity to store in excess of 80m³ of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or temporary storage of such waste."*

Recycling or Recovery of Waste

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

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

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

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

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

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

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

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

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

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

5.4.7. National Waste Management Strategy (NWMS) 2020

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

In terms of the National Waste Management Strategy ("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 5: Waste Hierarchy

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

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

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

The objectives of NEM:AQA are to:

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

Significant functions detailed in NEMAQA include:

- The National Framework for Air Quality Management.

Institutional planning matters, including:

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

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

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

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

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

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

The principles of the NEMAQA, focusing on minimisation of pollutant emissions have however be considered and incorporated into facility's draft EMPr (**Annexure L**).

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 proposed project site consists of an existing warehouse and associated infrastructure. No additional development will be required, therefore avoiding the need for vegetation clearance. No impacts on the area's biodiversity is anticipated.

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

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

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

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

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

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

The proposed waste recycling, recovery and treatment of activities to be undertaken by South Group Recycling, Cape Town will not trigger any water uses in terms of the NWA.

Water use for the facility will only be linked to domestic use which will be reliant on the existing municipal line.

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

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

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

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

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

The DFFE Screening Tool Report results shows that the site is of low sensitivity in terms of heritage and cultural importance. The South Group Recycling, Cape Town operations are currently housed within an

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

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

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

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

Although the DFFE Screening Tool identified a high sensitivity towards the Civil Aviation Theme, the applicability thereof in terms of the proposed project is disputed. All existing operations undertaken by South Group Recycling, Cape Town are located in an existing warehouse. No modification, alteration or extension to the facility or infrastructure will be required. The proposed recycling, recovery and treatment activities, as applied for, will continue to be managed within the same warehouse. The proposed operations will therefore not encroach into airspace.

South African Civil Authorisation Authority (SACAA) will be included on the Project stakeholder database and will be informed of the WML application and comment will be sought from the authority as applicable.

5.10. City of Cape Town Integrated Development Plan

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

The Cape Town IDP supports the city's 2027 mission to pro-actively develop and create a city environment that is resilient and sustainable and improves the quality of life, has an inclusive, job-intensive, resilient and

smart economy to build an inclusive community. The city’s priorities include the creation of job opportunities and sustained economic growth.

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

5.11. Municipal Spatial Development Framework (MSDF) and the Blaauwberg District Plan

In terms of the Municipal Spatial Development Framework (“MSDF”), it is important to note that the site in question is located within the Urban Inner Core (“UIC”), inside the City of Cape Town’s Urban Development Edge (“UDE”).

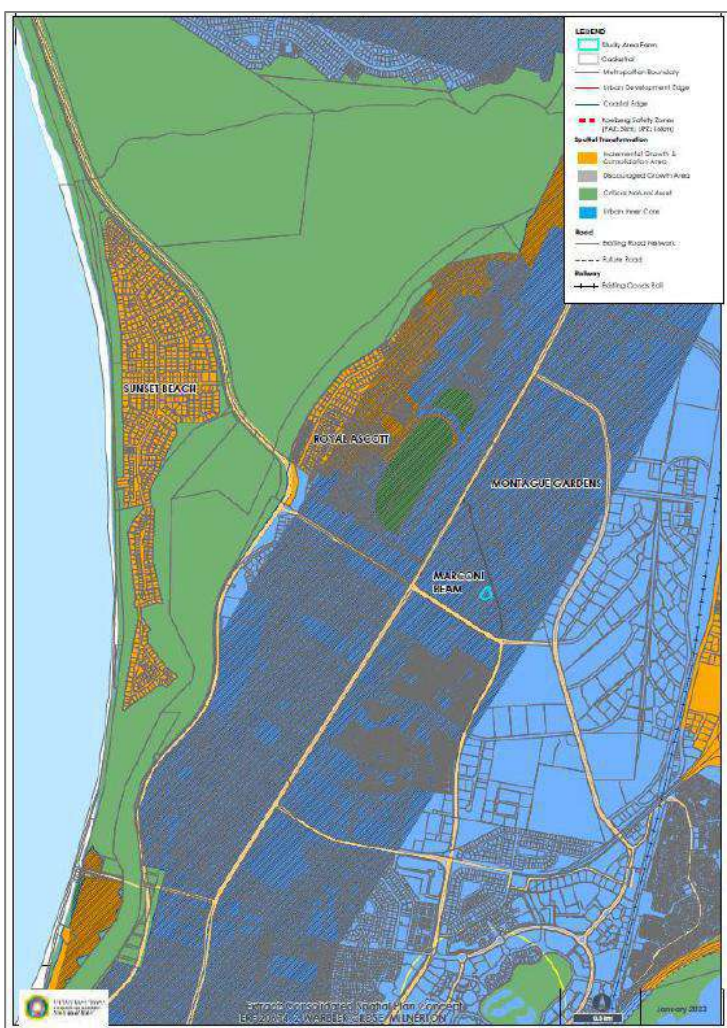


Figure 6: SDF Map 5D Extract (City of Cape Town Spatial Planning and Environment Directorate: Urban Planning and Design Department)

The UIC is an important designation, as it represents a spatially targeted area prioritised for public sector investment and/or co-investment between the public and private sectors, with a desired spatial outcome of supporting urban regeneration and spatial integration, increasing access to affordable housing opportunities where appropriate, and driving sustainable and inclusive economic growth. The purpose of the Urban Development Edge is to allow for the optimisation of land (vacant or underutilised) within built-up areas, such as Montague Gardens.

As a result, any and all risk-related industrial uses such as the recycling, recovery and or treatment of waste by South Group Recycling at their Cape Town Facility which falls within this spatial designation will be assessed not only in terms of the development's potential impact on surrounding land uses, but also within the framework of the Urban Inner Cores intended spatial outcomes. This includes alignment with spatial goals such as urban regeneration, inclusive growth, and sustainable development.

In addition to the above, Blaauwberg District Plan aligns with the Municipal Spatial Development Framework but provides further detail at a subdistrict level. The South Gorup Recycling, Cape Town facility selected for the proposed waste management activities falls under Subdistrict 2 of the Blaauwberg District Plan. In consideration to the District Plan, the proposed project will not trigger any of the detailed guidelines set out in terms thereof as an existing an existing warehouse will be used for the proposed operations. No development, modification or extension to the existing infrastructure will therefore be required.

The primary concern regarding the proposed land use relates to the hazardous nature of electronic waste (e-waste) and the potential risks associated with the storage and transfer of such materials. Given the potentially hazardous nature of the activity, it is essential that the city ensures that adequate safeguards are put in place by the applicant to protect neighbouring properties and the surrounding environment. By undertaking an impact assessment, potential risks and impacts are identified. Once identified and assessed, relevant mitigation measures must be developed and implemented by the applicant to ensure that identified risks are reduced and where possible avoided to limit any negative impact by the applicant (South Group Recycling) on neighbouring properties and the surrounding environment.

The aim of this report is to assess the proposed scope of work and to identify potential impacts associated therewith. Based on the outcomes of the assessment, an Environmental Management Program has been drafted (**Annexure L**) which includes relevant mitigation measures and strategies to manage and limit the identified impacts associated with the proposed project.

5.12. City of Cape Town Air Quality Management By-Law (2016, as amended)

➤ Section 4: Duty of Care (Reasonable measures to prevent air pollution)

Section 4 of the City of Cape Town Air Quality Management By-Law (2016, as amended) establishes a general duty of care applicable to all persons undertaking activities that may impact on air quality. The provision is framed broadly and is preventative in nature, requiring that reasonable and practicable measures be taken to avoid the generation of air pollution, or where this is not possible, to minimise and remedy its effects.

Based on the context and implementation of the Municipal By-Laws, and specifically Section 4, all operators, regardless of scale or classification remain responsible for managing their air quality impacts. By undertaking relevant recycling, recovery and or treatment of e-waste and spent catalytic convertors, South Group Recycling, Cape Town must ensure to implement appropriate mitigation measures to reduce the risk of impact on air quality, prevent nuisance, health risks, or environmental degradation associated with air emissions.

As part of the impact assessment phase of this application, relevant aspects and associated risks were assessed and based on the outcomes and appropriate mitigation measures recommended and recorded in the Environmental Management Program (**Annexure L**).

➤ Section 19: Emissions caused by open burning (authorisation of open burning and burning of material)

Section 19 of the City of Cape Town Air Quality Management By-Law (2016, as amended) regulates emissions arising from open burning by establishing a general prohibition on the burning of any material in the open air where such activity may cause air pollution or nuisance.

The proposed waste management activities to be undertaken by South Group Recycling, Cape Town will be located within the bounds of an existing warehouse structure. At no point in time will open fires or burning of material be implemented or required. No combustion units or external fuel sources will be needed as all operations will rely on municipal electricity supplies.

Section 19 of the City of Cape Town Air quality By-Laws is not considered applicable within the scope of the proposed project.

➤ Section 25: Emissions that cause a nuisance (Prohibition of emissions that cause nuisances)

Any activity that causes or is likely to cause a nuisance, regardless of whether the activity is otherwise authorised or compliant with specific emission limits is prohibited. South Gorup Recycling, Cape Town

therefore holds an ongoing responsibility to ensure that their activities are managed in a manner that prevents adverse impacts on neighbouring properties and the receiving environment. Effective operational controls, maintenance of equipment, and implementation of mitigation measures must be maintained throughout each phase of the project in order to minimise fugitive emissions and odour generation. As applicable relevant mitigation measures have been recommended and included in the Environmental Management Program (**Annexure L**).

➤ **Section 26: Emissions that cause a nuisance (Dust Emissions).**

The City of Cape Town Air Quality Management By-Law (2016, as amended) specifically recognises dust emissions as a common source of air pollution and nuisance, particularly from industrial, construction, and material handling activities. In this context, the By-Law prohibits any activity that generates dust in such quantities or of such a nature that it causes, or is likely to cause, a nuisance to surrounding properties or the receiving environment.

The provision places a responsibility on operators to implement reasonable and effective dust control measures to prevent the generation and dispersion of particulate matter. These measures may include, inter alia, the suppression of dust through wetting, enclosure of operations, wind shielding, covering of stockpiles and vehicles, and the use of extraction or filtration systems where appropriate. The emphasis is on proactive management to limit fugitive dust emissions at source and to prevent off-site impacts.

This requirement applies irrespective of whether specific dust fall limits are exceeded, thereby reinforcing the principle that compliance is not solely based on numerical thresholds but also on the prevention of visible and perceptible nuisance conditions. As such, it supports the broader objective of protecting ambient air quality, public health, and the amenity of adjacent land uses.

A fugitive emission management plan was drafted and is attached to this report under **Annexure M**.

6. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES

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

6.1. Electronic Waste

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

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

By properly recycling e-waste, valuable materials such as copper, gold, and aluminium can be recovered and reused. Moreover, e-waste recycling helps prevent hazardous substances found in electronics, like lead and mercury, from contaminating soil and water. Proper recycling methods avoid the leaching of these toxins to the natural environment by implementing appropriate and safe methods, protecting ecosystems and public health.

It's a collective responsibility to ensure that electronic waste is managed of properly. Companies like South Group Recycling are leading the way in this vital endeavour, offering services that not only protect the environment but also contribute to a sustainable future. If approved, South Group Recycling will be able to install relevant equipment needed to effectively and sustainably process e-waste at their Cape Town facility. Processing of e-waste with the aim of recovering materials which can be subjected to recycling supports the national effort to reduce waste and to divert waste form landfill.

Table 6: Need and Desirability Considerations

QUESTION		ANSWER
SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES		
1.	How will this development (and its separate elements/aspects) impact on the ecological integrity of the area)?	The South Group, Cape Town facility is located within an existing warehouse which forms part of an industrial site in an industrial area which is completely transformed with no natural vegetation remaining.
1.1.	How were the following ecological integrity considerations taken into account?	The warehouse which is also the proposed project site is located within the Cape Flats Fynbos biome which is listed as a Critically Endangered and is classified as a Critical Biodiversity Area (CBA), however due to severe urbanisation the specific site and surroundings have completely been transformed. As indicated above, no natural vegetation remains. According to available statistics, only 20% of the of the biome's original extent remains, with less than 2% of its original total extent conserved.
1.1.1.	Threatened Ecosystems	As such, sustainable land use is promoted in order to limit further disturbance and to support the targeted 26% national conservation target.
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	Should South Group Recycling be authorised to undertake the proposed recycling, recovery and or
1.1.3.	Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs")	
1.1.4.	Conservation targets	

QUESTION		ANSWER
1.1.5.	Ecological drivers of the ecosystem	treatment activities all associated operations will be located within a pre-existing warehouse. No modification, alteration or extension to the existing infrastructure will be required.
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.)	<p>The warehouse selected for the proposed project is located within the City of Cape Towns' Urban Inner Core ("UIC"), inside the City of Cape Towns' Urban Development Edge ("UDE").</p> <p>The city's Urban Inner Core is designed to support urban regeneration with the aim of driving sustainable and inclusive economic growth.</p> <p>By utilising an existing warehouse and associated in infrastructure, South Group Recycling will be supporting the City's Spatial Development Framework whilst also avoiding the need for development outside of the city's edges which in turn will result in continued disturbance and loss of viable and protected habitat space. The proposed location supports conservation efforts.</p>
1.2.	<p>How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity?</p> <p>What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The proposed recycling, recovery and treatment of waste by South Group Recycling, Cape Town will be limited to an existing warehouse which is located within an established industrial area within the City of Cape Towns' Urban Inner Core ("UIC"), inside the City of Cape Towns' Urban Development Edge ("UDE") which has been completely developed, resulting in the area to yield very low ecological value.</p> <p>Continued and practical use of existing and established industrial space is supported as the effort reduces the need for alternative developments in areas with higher ecological value or biological diversity.</p> <p>In order to assess and identify relevant impacts on the receiving environment, a full impact assessment was undertaken (refer to Identified IMPACTS AND PROPOSED MITIGATION MEASURES 10 and Annexure K of this report).</p> <p>In conclusion to the outcomes of the impact assessment, reasonable mitigation measures have been assigned with the aim of avoiding the identified impact or to reduce its risk and are included in an EMPr (Annexure L) which is designed and aimed at</p>

QUESTION	ANSWER
	<p>managing, mitigating and monitoring potential environmental impacts during all phases of a project.</p>
<p>1.3.</p> <p>How will this development pollute and/or degrade the biophysical environment?</p> <p>What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>The proposed recycling, recovery and treatment of e-waste and spent catalytic convertors by South Group Recycling, if unmitigated will impact on air quality, soil and water resources and human health.</p> <p>In order to quantitatively assess all aspects and impacts associated with the proposed project, a comprehensive environmental impact assessment was undertaken, and the outcomes summarised in the impact assessment tables under Section 10 and Annexure K of this report.</p> <p>In conclusion, an EMPr has been developed which is designed to manage, mitigate, and monitor potential environmental impacts during all phases of a project. A copy of the Draft EMPr is also attached to this report under Annexure L.</p>
<p>1.4.</p> <p>What waste will be generated by this development?</p> <p>What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste?</p> <p>What measures have been explored to safely treat and/or dispose of unavoidable waste?</p>	<p>Due to the nature of the application and proposed project, it is anticipated that general waste, inclusive of used bulk bags, plastic, packaging waste, office paper etc will be generated during the operational phase of the project. As far as reasonably possible, relevant waste management procedures will be implemented to limit mixing of waste and to promote recycling and or re-use where possible.</p> <p>All waste removed from site for recycling, recovery and or disposal will be facilitated by licensed service providers, dually authorised for the designated service.</p> <p>Relevant mitigation measures have been identified and included in the draft EMPr (Annexure L) which, once approved will be implemented.</p>

QUESTION	ANSWER
<p>1.5. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage?</p> <p>What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The warehouse selected for the proposed project is located within the City of Cape Towns' Urban Inner Core ("UIC"), inside the City of Cape Towns' Urban Development Edge ("UDE") which is designed to support urban regeneration with the aim of driving sustainable and inclusive economic growth.</p> <p>No landscape disturbance is anticipated as the proposed operation will be located within a suitably zoned area, which is already dominated by similar industrialised activities. An existing warehouse will continue to be used, limiting the need for a new development. All proposed waste management activities will be housed within the bounds of the warehouse, further limiting possible visual impacts to the surrounding community.</p>
<p>1.6. How will this development use and/or impact on non-renewable natural resources?</p> <p>What measures were explored to ensure responsible and equitable use of the resources?</p> <p>How have the consequences of the depletion of the non-renewable natural resources been considered?</p> <p>What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The proposed recycling, recovery and treatment of e-waste and spent catalytic converters will support the conservation of natural resources by reducing the need for waste disposal to land.</p> <p>As of August 2021, the disposal of e-waste to landfills is prohibited, further creating a need for a sustainable and reliable alternative.</p> <p>E-waste recycling supports the sustainable recovery of valuable materials that would otherwise need to be mined. On average 1 ton of e-waste, contains more gold than mined ore.</p> <p>Sustainable recycling, recovery and or treatment of e-waste and spent catalytic converters will in turn reduce the need for mining activity to supply relevant resources such as gold, copper, silver, palladium, aluminium as well as other rare earth metals which can be recovered from e-waste for re-use.</p> <p>In terms of the proposed project scope, several alternatives were considered, inclusive of alternative technology types to be used for the proposed waste management activities, alternative locations and designs were also considered and are addressed under Section 7 of this report. Based on the outcomes, the preferred project scope was selected as the best suited option due to the overall feasibility and low impact risk if appropriately mitigated.</p>

QUESTION	ANSWER
<p>1.7. How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part?</p> <p>Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds?</p> <p>What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources?</p> <p>What measures were taken to ensure responsible and equitable use of the resources?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The South Group, Cape Town operations are located in an established industrial area and within an existing warehouse, equipped to house ongoing as well as planned waste management activities. No new development will be required nor will any alteration, modification or extension to the existing warehouse be needed.</p> <p>Current operations rely mainly on manual labour which forms the basis of existing sorting and screening activities. If the proposed recycling, recovery and treatment activities are approved, South Group Recycling will be able to install additional equipment to automate the processing operations. Once fully operational, a balance of manual and automated labour will be used for processing. In industry, many operations rely on water and high energy inputs as part of their recycling and processing needs. South Group Recycling, Cape Town will however not require water inputs for processing purposes. Additionally, the streamline design and use of state-of-the-art technology will also reduce energy inputs and needs, reducing and minimising the use of natural resources.</p>
<p>1.7.1. Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth, or does it reduce resource dependency (i.e., de-materialized growth)?</p> <p>(Note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life).</p>	<p>The processing of e-waste and spent catalytic convertors in turn will result in the generation and supply of precious metals as well as other recyclable materials. Sustainable supply of recycled and or recovered precious metals will lead to a reduced need for mined minerals which in turn will have a positive impact on the environment.</p>
<p>1.7.2. Does the proposed use of natural resources constitute the best use thereof?</p> <p>Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e., what are the opportunity costs of using these resources this the proposed development alternative?)</p>	<p>Recycling of e-waste and spent catalytic convertors also avoids the need for waste disposal to land. By avoiding the disposal, the possibility of heavy metals like lead and mercury which are present in many electronic devices, PC boards, appliances etc from contaminating soil and water resources. Proper recycling methods ensure these toxins are handled safely, protecting ecosystems and public health.</p>
<p>1.7.3. Do the proposed location, type and scale of development promote a reduced dependency on resources?</p>	

QUESTION		ANSWER
1.8.	How was a risk-averse and cautious approach be applied in terms of ecological impacts?	<p>In order to successfully undertake a comprehensive impact assessment, a site visit was undertaken. During the visit relevant operations were assessed. A desktop assessment and research into the proposed project scope, methods and procedures was also undertaken in order to wholistically understand the planned operations to be undertaken (if approved).</p> <p>The assessment is based on the best available information at the time of undertaking the study; however, certain limitations in current knowledge remain. These include the availability of baseline environmental data, seasonal constraints associated with ecological surveys, and the predictive nature of impact assessment methodologies.</p> <p>Refer to Section 9 of this report for the Assessment methodology and Annexure K of this report for copies of the Impact Assessment Tables.</p>
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?	
1.9.	How will the ecological impacts result from this development impact on people's environmental right in terms following:	<p>The proposed e-waste recycling, recovery and treatment activities as applied for will be restricted to an existing warehouse, located in an established industrial area. The warehouse selected for the proposed project is already used by South Group Recycling for their ongoing waste storage and transfer activities.</p> <p>Several alternatives were considered as part of the application and impact assessment, however based on outcomes, the continued use of the existing warehouse was considered the most suited option which in turn would have the lowest impact.</p> <p>Continued use of an existing industrial facility for the proposed waste management activities will limit and avoid the loss of virgin land or open space altogether. No visual impact is anticipated as no alteration, extension or modification to the existing building and associated infrastructure will apply.</p>
1.9.1.	<p>Negative impacts: e.g., access to resources, opportunity costs, loss of amenity (e.g., open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc.</p> <p>What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimize, manage and remedy negative impacts?</p>	

QUESTION		ANSWER
1.9.2.	<p>Positive impacts: e.g., improved access to resources, improved amenity, improved air, or water quality, etc.</p> <p>What measures were taken to enhance positive impacts?</p>	<p>Aspects associated with the proposed project were assessed as part of the impact assessment and where applicable, relevant mitigation measures recommended to minimise the risk and severity thereof. Refer to Section 10 of this report and Annexure K of this report for copies of the Impact Assessment Tables.</p> <p>In conclusion, an EMPr has been drafted which is designed to manage, mitigate, and monitor potential environmental impacts during all phases of a project. A copy of the Draft EMPr is also attached to this report under Annexure L.</p>
1.10.	<p>Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socioeconomic impacts (e.g., on livelihoods, loss of heritage site, opportunity costs, etc.)?</p>	<p>Limited direct ecological impacts associated with the proposed project are anticipated as the proposed project will be located and limited to an existing warehouse, located in an established industrial area.</p> <p>Approval of the proposed project will allow the South Group Recycling, Cape Town to continue with operation at a more competitive level, providing employment security to already employed personnel. New employment opportunities may also be generated which positively impacts the surrounding community.</p> <p>The proposed recycling, recovery and treatment operations will also allow South Group Recycling, Cape Town to produce higher quality products which in turn support alternative industries which rely on the materials for their operation and the production of alternative products and materials, thus wholistically supporting the economy.</p> <p>In south Africa, on average only 12% of e-waste generated is effectively recycled. In addition, the disposal of e-waste to land is banned, creating a need for regulated recycling facilities who are authorised to accept and manage the waste. South Group Recycling therefore intent to support national efforts to reduce waste, recycle waste and recover waste in order to limit and avoid landfill disposal whilst still undertaking the said operations under required authorisation.</p>

QUESTION	ANSWER
<p>1.11. Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?</p>	<p>A very low ecological impact is anticipated as the proposed project will be located within an established industrial area and housed in an existing warehouse, already utilised by South Group, Cape Town for existing waste storage and transfer activities.</p> <p>Continued use of an existing industrial space, limits the need for land development in an alternative location, limiting ecological disturbance, urban encroachment into natural habitat and loss of open space.</p> <p>By implementing appropriate mitigation throughout each phase of the project, potential negative impacts can effectively be managed and the risk and severity significantly reduced.</p>
<p>1.12. Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the “best practicable environmental option” in terms of ecological considerations?</p>	<p>Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report.</p> <p>Based on the outcomes of the assessments and discussions the best suited option with the lowest impact was chosen for the application.</p>
<p>1.13. Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the Project in relation to its location and existing and other planned developments in the area?</p>	<p>Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report.</p> <p>Based on the outcomes of the assessments and discussions the best suited option with the lowest impact was chosen for the application.</p> <p>Aspects associated with the proposed project were assessed as part of the impact assessment and where applicable, relevant mitigation measures recommended to minimise the risk and severity thereof. Refer to Section 10 of this report and Annexure K of this report for fill copies of the Impact Assessment Tables.</p> <p>In conclusion, an EMPr has been drafted which is designed to manage, mitigate, and monitor potential environmental impacts during all phases of a project. A copy of the Draft EMPr is also attached to this report under Annexure L.</p>

QUESTION	ANSWER
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 or 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").
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?
2.3.	How will this development address the specific physical, psychological, developmental, cultural and
<p>The South Group, Cape Town facility operate form within an existing warehouse located within the City of Cape Town's Urban Inner Core ("UIC"), inside the City of Cape Town's Urban Development Edge ("UDE").</p> <p>The city's Urban Inner Core is designed to support urban regeneration with the aim of driving sustainable and inclusive economic growth.</p> <p>By utilising an existing warehouse and associated in infrastructure, South Group Recycling will be supporting the City's Spatial Development Framework whilst also avoiding the need for development outside of the city's edges which in turn will result in continued disturbance and loss of viable and protected habitat space. The proposed location supports conservation efforts.</p> <p>Refer to Section 8 of this report for a discussion on the site and surrounding areas socio and economic context and the surrounding land use descriptions.</p>	
<p>The WML application by South Group Recycling will benefit society and the surrounding communities both directly and indirectly by providing employment opportunities. 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.</p>	
<p>The local community will benefit directly form the proposed project on a social and economic scale through employment opportunities and skill</p>	

QUESTION	ANSWER
social needs and interests of the relevant communities?	<p>development. Limited cultural or heritage impacts are anticipated as the proposed project will continue to be housed within an existing warehouse in an industrially zoned area. Operations will therefore not encroach into local communities or impact the visual aesthetic of the surrounding areas.</p> <p>Communications with the relevant IAPs are recorded throughout the application process. All comments and concerns raised are documented and incorporated into the relevant reports as needed in order to ensure that all social aspects are addressed.</p>
<p>2.4. Will the development result in equitable (intra- and inter-generational) impact distribution, in the short and long-term?</p> <p>Will the impact be socially and economically sustainable in the short- and long-term?</p>	<p>The proposed waste management activities as applied for by South Group Recycling is not expected to result in significant impacts on current or future generations. In the short term, the proposed project will generate positive socio-economic benefits through employment opportunities, economic activity, and improved as well as regulated waste management services.</p> <p>In the long term, e-waste recycling reduces the need for landfill disposal, limiting the risk of pollution to soil and water resource which directly impact animal as well as human health. Recycling and recovery efforts also supports the conservation of mineral resources and reduces the need for virgin resource extraction by means of mining activity. In conclusion, e-waste recycling, recovery and treatment, if authorised will support inter-generational equity by means of conservation and sustainable recovery and re-use of valuable resources.</p> <p>Potential negative impacts, such as noise, dust, and increased traffic during operation, are expected to be localised and can be mitigated through appropriate management measures as included and addressed in the draft EMPr (Annexure L). The overall impact distribution is therefore considered to be low, provided that recommended mitigation measures are implemented.</p>
2.5. In terms of location, describe how the placement of the proposed development will -	The proposed waste management activities as applied for will be restricted to the bounds of an existing

QUESTION		ANSWER
2.5.1.	Result in the creation of residential and employment opportunities in close proximity to or integrated with each other,	<p>warehouse, located in an established industrial area. The site location is considered ideal with existing roads provide easy access to and from the site for both employees and transportation services.</p> <p>The project site is located within the City of Cape Town's Urban Inner Core, which is a prioritized focus area for infrastructure investment, economic development, and higher-density, mixed-use growth, aiming to foster transit-oriented development. The proposed waste management facility therefore aligns with the approved land use and the city's development frameworks.</p> <p>Existing resources will continue to be utilised, limiting the need for virgin land development or expansion of the city's urban footprint. Energy and resource needs will also rely on municipal supplies, therefore limiting the need and for alternative resource intake.</p> <p>Relevant alternatives in terms of technology, design, layout and location were assessed. The final layouts, designs and technology selected for the project will optimally utilise the available space which will support effective and efficient operations in the long term.</p>
2.5.2.	Reduce the need for transport of people and goods,	
2.5.3.	Result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	
2.5.4.	Compliment other uses in the area,	
2.5.5.	Be in line with the planning for the area,	
2.5.6.	For urban related development, make use of underutilised land available with the urban edge,	
2.5.7.	Optimise the use of existing resources and infrastructure,	
2.5.8.	Opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),	
2.5.9.	Discourage "urban sprawl" and contribute to compaction/densification	
2.5.10.	Contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,	
2.5.11.	Encourage environmentally sustainable land development practices and processes,	
2.5.12.	Take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),	

QUESTION	ANSWER
2.5.13.	The investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),
2.5.14.	Impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and
2.5.15.	In terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?
2.6.	How were a risk-averse and cautious approach applied in terms of socio-economic impacts?
2.6.1.	What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?
2.6.2.	What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?
2.6.3.	Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?
2.7.	How will the socio-economic impacts result from this development and impact on people's environmental right 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 minimise, manage and remedy negative impacts?
2.7.2.	Positive impacts. What measures were taken to enhance positive impacts?
<p>In order to successfully undertake a comprehensive impact assessment, a site visit was undertaken. During the visit relevant operations were assessed. A desktop assessment and research into the proposed project scope, methods and procedures was also undertaken in order to wholistically understand the planned operations to be undertaken (if approved).</p> <p>The assessment is based on the best available information at the time of undertaking the study; however, certain limitations in current knowledge remain. These include the availability of baseline environmental data, seasonal constraints associated with ecological surveys, and the predictive nature of impact assessment methodologies.</p> <p>Refer to Section 9 of this report for the Assessment methodology and Annexure K of this report for copies of the Impact Assessment Tables.</p> <p>Potential negative socio-economic impacts associated with the proposed development may include increased noise, dust generation, traffic movement, and potential occupational health and safety risks during the handling and processing of electronic waste.</p> <p>To avoid and minimise identified impacts, a number of mitigation measures will be implemented and managed through an EMPr (Annexure L). Mitigation measures to be implemented include the maintenance of housekeeping standards, dust suppression measures (as applicable), maintenance of equipment to limit noise emissions, implementation of traffic management procedures or protocols, and adherence</p>	

QUESTION	ANSWER
	<p>to occupational health and safety protocols for workers handling e-waste. Appropriate waste management procedures and training efforts will also be implemented in order to promote safe and effective handling and management of both waste received for processing as well as waste generated and removed from the operational site.</p> <p>By implementing reasonable measures, potential negative impacts on people's environmental rights will be minimised and effectively managed.</p> <p>The proposed operation will create employment opportunities during both the construction and operational phases, skills development for workers involved in the recycling sector, and contributions to the local economy. The recycling of electronic waste and the recovery of valuable materials, reduces pressure on landfill space by avoiding disposal all together. In addition, the recovery of recyclable materials along with precious metals reduces the need for manufactured raw material or mined minerals which in turn significantly impacts natural resources due to mining and indirect pollution.</p> <p>South Group Recycling is committed to enhancing positive impacts by sourcing employment form the local community and providing training opportunities for employees and supporting responsible e-waste management practices. The development therefore contributes positively to environmental protection and economic activity, while supporting sustainable waste management practices.</p>

QUESTION	ANSWER
<p>2.8. Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</p>	<p>Limited direct ecological impacts associated with the proposed project are anticipated as the proposed project will be located and limited to an existing warehouse, located in an established industrial area.</p> <p>Approval of the proposed project will allow the Applicant to continue with operation at a more competitive level, providing employment security to already employed personnel. New employment opportunities may also be generated which positively impacts the surrounding community.</p> <p>The proposed recycling, recovery and treatment operations will also allow South Group Recycling, Cape Town to produce higher quality products which in turn support alternative industries which rely on the materials for their operation and the production of alternative products and materials, thus wholistically supporting the economy.</p> <p>In South Africa, on average only 12% of e-waste generated is effectively recycled. In addition, the disposal of e-waste to land is banned, creating a need for regulated recycling facilities who are authorised to accept and manage the waste. South Group Recycling therefore intent to support national efforts to reduce waste, recycle waste and recover waste in order to limit and avoid landfill disposal whilst still undertaking the said operations under required authorisation.</p>
<p>2.9. What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?</p>	<p>Alternative technologies, designs and site locations were considered and are discussed under Section 7 of this report.</p> <p>Site selection considered factors such as compatibility with surrounding land uses, access to existing transport infrastructure, and sufficient separation from sensitive receptors to minimise nuisance impacts such as noise, dust, and traffic as well as financial need and contribution. The proposed project supports socio-economic objectives by creating employment opportunities and contributing to improved waste management through the recycling of electronic waste.</p>

QUESTION	ANSWER
<p>2.10. What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?</p> <p>Considering the need for social equity and justice, do the alternatives identified, allow the “best practicable environmental option” to be selected, or is there a need for other alternatives to be considered?</p>	<p>Alternatives were evaluated in terms of their environmental, social, and economic implications. The preferred alternative was selected based on its ability to minimise potential environmental and social impacts while maximising socio-economic benefits such as employment opportunities, improved waste management infrastructure, and resource recovery from electronic waste.</p> <p>Based on the assessment, site suitability, and associated mitigation measures, the preferred alternative is considered the best suited environmental option. The assessment has demonstrated that the proposed development can be implemented in a manner that is socially equitable and environmentally responsible.</p>
<p>2.11. What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</p>	<p>Measures to promote equitable access to environmental resources, benefits and services were considered during the planning and assessment of the proposed development.</p> <p>The planned operation of the waste management facility will contribute to sustainable waste management in South Africa and support environmental protection through the responsible collection and processing of e-waste. The broader community will benefit from the operations as the pollution risks will be reduced which in turn support conservation efforts and reduced need for natural resources which need to be mined (precious metals such as gold, palladium, silver, aluminium etc).</p> <p>On a socio-economic scale, associated benefits resulting from the operation of the proposed project will include the generation of employment opportunities, skills development, and participation in the recycling value chain. South Group Recycling is committed to sourcing individuals from the local community for employment opportunities. In addition, fair and non-discriminatory employment practices will be implemented.</p>

QUESTION		ANSWER
2.12.	What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?	<p>To avoid and minimise identified impacts, a number of mitigation measures will be implemented and managed through an EMPr (Annexure L). Mitigation measures to be implemented include the maintenance of housekeeping standards, dust suppression measures (as applicable), maintenance of equipment to limit noise emissions, implementation of traffic management procedures or protocols, and adherence to occupational health and safety protocols for workers handling e-waste. Appropriate waste management procedures and training efforts will also be implemented in order to promote safe and effective handling and management of both waste received for processing as well as waste generated and removed from the operational site.</p> <p>By implementing reasonable measures, potential negative impacts on people's environmental rights will be minimised and effectively managed.</p>
2.13.	What measures were taken to:	<p>Comprehensive public participation was undertaken during the scoping phase and will again be undertaken in support to the EIR phase of this application. Measures implemented were aligned with the requirements set out in terms of the NEMA EIA and Public Participation Regulations, as amended.</p> <p>Interested and affected parties (I&APs) were identified and notified of the proposed development through site notices, written notifications, Basic Information Document and the circulation of relevant project information via a newspaper notice placed in a local newspaper circulated in the applicable area.</p> <p>The process is aimed at providing stakeholders with the opportunity to review project information and submit comments, concerns, or recommendations. Access to information was ensured by making relevant project documentation available to stakeholders and providing adequate time for review and comment.</p> <p>Stakeholder inputs are recorded, considered, and addressed within the assessment to ensure that the interests, needs, and values of affected parties were taken into account.</p> <p>The public participation process also contributes to community awareness and environmental education</p>
2.13.1.	Ensure the participation of all interested and affected parties,	
2.13.2.	Provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation,	
2.13.3.	Ensure participation by vulnerable and disadvantaged persons,	
2.13.4.	Promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,	
2.13.5.	Ensure openness and transparency, and access to information in terms of the process,	
2.13.6.	Ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition was given to all forms of knowledge, including traditional and ordinary knowledge, and	

QUESTION		ANSWER
2.13.7.	Ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted?	<p>by sharing information on the proposed development, environmental management measures, and the importance of responsible waste management practices.</p> <p>Records of the public participation process undertaken as part of the EIR phase of this application will be included in the Final EIR under Annexure C.</p>
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)?	The interests, needs and values of interested and affected parties were considered during the assessment of the proposed development through the public participation process and the evaluation of socio-economic impacts. The proposed development is an e-waste recycling facility and is therefore not directly associated with residential development or housing opportunities. However, the project is expected to contribute positively to the local economy by creating employment opportunities during the operational phase and supporting activities within the recycling and waste management sector.
2.15.	What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?	<p>Training and awareness measures will be put in place and are addressed in the EMP (Annexure L).</p> <p>All employees will be subject to ongoing training and awareness campaigns which will ensure that current and future employees are adequately informed of risks associated with their work, exposure to materials and waste managed and handled on site and as well as appropriate safety measures and mitigation measures applicable.</p>
2.16.	Describe how the development will impact on job creation in terms of, amongst other aspects:	<p>The proposed development is expected to result in positive impacts in terms of job creation, specifically during the operational phase. Confirming the level of employment opportunities at this time is however not considered feasible as this will depend on the company's and operations growing needs once operational.</p> <p>Given the proposed location of the planned operations within an industrial area, workers are anticipated to travel from surrounding towns or settlements within reasonable commuting distances. This aspect was also</p>
2.16.1.	The number of temporaries versus permanent jobs that will be created,	
2.16.2.	Whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area),	
2.16.3.	The distance from where labourers will have to travel,	

QUESTION		ANSWER
2.16.4.	The location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and	assessed as part of the need and desirability in terms of site locations. Refer to Section 6 of this report.
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.).	In terms of opportunity costs, the proposed development is not expected to result in the displacement of existing economic activities or employment sectors, as it will be located within an area appropriate for industrial activities. Instead, the facility will contribute to the waste management and recycling sector, supporting resource recovery and the circular economy without significantly impacting other employment-generating land uses.
2.17.	What measures were taken to ensure:	South Group, Cape Town is in the process of applying for a Waste Management License (WML) in terms of the National Environmental Management: Waste Act, 59 of 2008 (NEMWA), read together with the Environmental Impact Assessment Regulations, 2014.
2.17.1.	That there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and	As part of the application process alternative legislations and regulations were considered and included in a summarised discussion under Section 5 of this report.
2.17.2.	That actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?	Application documents such as the Draft Scoping Report and EIR were also subject to a comprehensive public participation process during which relevant authorities were consulted and their comments and opinions recorded and incorporated into the final version of each report. Refer to Section 16 of this report for a summary of the public participation process applied in support to the EIR phase. Records of public participation and correspondence with identified IAPS during this process will be included in the Final EIR under Annexure C .
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?	The proposed e-waste management facility will contribute to the beneficial use of environmental resources through the recovery and recycling of electronic waste, thereby reducing the demand for virgin raw materials and supporting the principles of the circular economy. Environmental management measures, including waste handling protocols, pollution prevention measures, and monitoring requirements, will be implemented to ensure that environmental resources are used efficiently and

QUESTION	ANSWER
	<p>responsibly, without compromising ecosystem integrity.</p> <p>In addition, by undertaking a comprehensive public participation process, it is ensured that the interests of the community are considered. Comments and concerns raised by the public and relevant IAPs is therefore used to guide the impact assessment, reinforcing the principle that the environment is a shared resource that must be managed in a transparent and accountable manner. Through these measures, the management and operation of the proposed e-waste recycling, recovery and treatment activities must balance socio-economic benefits with the protection of environmental resources for present and future generations.</p>
2.19.	<p>Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?</p> <p>Mitigation measures prescribed in the EMPr were based on the outcome of impacts identified during the impact assessment process and are realistic and easily implementable.</p> <p>Refer to Section 10 and Annexure K of this report for a full summary of the impact assessment undertaken and Annexure L for a copy of the Draft EMPr.</p>
2.20.	<p>What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?</p> <p>South Group Recycling, Cape Town is in the business of waste minimization which supports the objectives of the National Waste Hierarchy by preventing unnecessary disposal of high-risk waste (such as e-waste) to land. By recovering, recycling and treating the waste, the potential contamination of natural resources, leading to human and animal health impacts is avoided. In addition, the recycling, recovery and treatment activities will generate high quality materials which can sustainably be provided to alternative industries for the production high value products and materials.</p> <p>Indirectly the operation will reduce the need for raw material inputs which in general are supplied by mining operations which as a whole have a large-scale impact on the environment.</p>

QUESTION	ANSWER
<p>2.21. Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?</p>	<p>Alternatives were considered to ensure the protection of ecological integrity while achieving a balanced socio-economic outcome. The preferred option was selected as the Best Practicable Environmental Option based on a comparative evaluation of site location, design, layout and location.</p> <p>Each identified alternative for the proposed development was assessed in terms of its overall potential environmental and socio-economic impacts. This included consideration of site suitability, operational requirements, potential impacts on surrounding land uses, and the feasibility of implementing mitigation measures. The preferred alternative was selected based on its ability to minimise potential environmental impacts such as noise, dust generation, traffic, and waste handling risks, while remaining compatible with the surrounding land-use context and existing infrastructure.</p> <p>From a socio-economic perspective, the preferred option provides opportunities for local employment, skills development, and economic activity within the recycling and waste management sector, while contributing to improved environmental management through the recovery and recycling of electronic waste. The assessment determined that the preferred alternative allows the proposed activity to be undertaken in a manner that balances environmental protection with socio-economic benefits. On this basis, the selected alternative is considered to represent the Best Practicable Environmental Option, as it promotes sustainable development while minimising adverse environmental impacts and supporting responsible resource use.</p>
<p>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?</p>	<p>In terms of positive cumulative impacts, the proposed e-waste recycling facility will contribute to the growth of the waste management and recycling sector, supporting resource recovery and promoting more sustainable waste management practices. The development may also contribute to local economic activity through employment opportunities, procurement of goods and services, and potential linkages with other recycling or waste management initiatives in the region. Over time, these activities may support broader environmental and economic benefits</p>

QUESTION	ANSWER
	<p>associated with the transition towards a circular economy.</p> <p>Potential negative cumulative socio-economic impacts may include nuisance conditions due to noise generation, or temporary traffic impacts due to the transport to and from the operational site. However, given the relatively small scale of the proposed facility and its location within an area considered appropriate for industrial or waste management activities, these impacts are expected to be limited and manageable through the implementation of appropriate mitigation measures.</p> <p>Overall, the cumulative socio-economic impacts of the proposed development are anticipated to be predominantly positive, with localised and manageable negative impacts that can be addressed through appropriate environmental and operational management practices.</p>

7. REASONABLE AND FEASIBLE ALTERNATIVES CONSIDERED

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

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

7.1. No-Go Alternative

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

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

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

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

7.2. Alternative Locations

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

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

The existing site and location proposed considered to be completely transformed due to existing and ongoing industrial activities. By utilising an existing site and associated infrastructure, no virgin land will

need to be transformed to accommodate the proposed operations. The site is not situated near any sensitive environmental features that can be impacted by the proposed activities.

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

Table 7: Site Selection Matrix

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

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

7.3. Alternative Technologies

South Group Recycling, Cape Town accepts all ranges of e-waste as well as spent catalytic convertors which are subject to manual sorting as well as crushing and screening before being packaged and sold to relevant clients for additional processing. South Group Recycling proposes to install additional equipment with the aim of recycling, recovery and treating e-waste to increase its export volumes.

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

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

7.4. Alternatives in terms of Scheduling and Timing

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

7.5. Alternatives in terms of Scale and Magnitude

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

7.6. Conclusion to the Alternatives Considered

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

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

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

8. DESCRIPTION OF THE BASELINE ENVIRONMENT

8.1. Climate

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

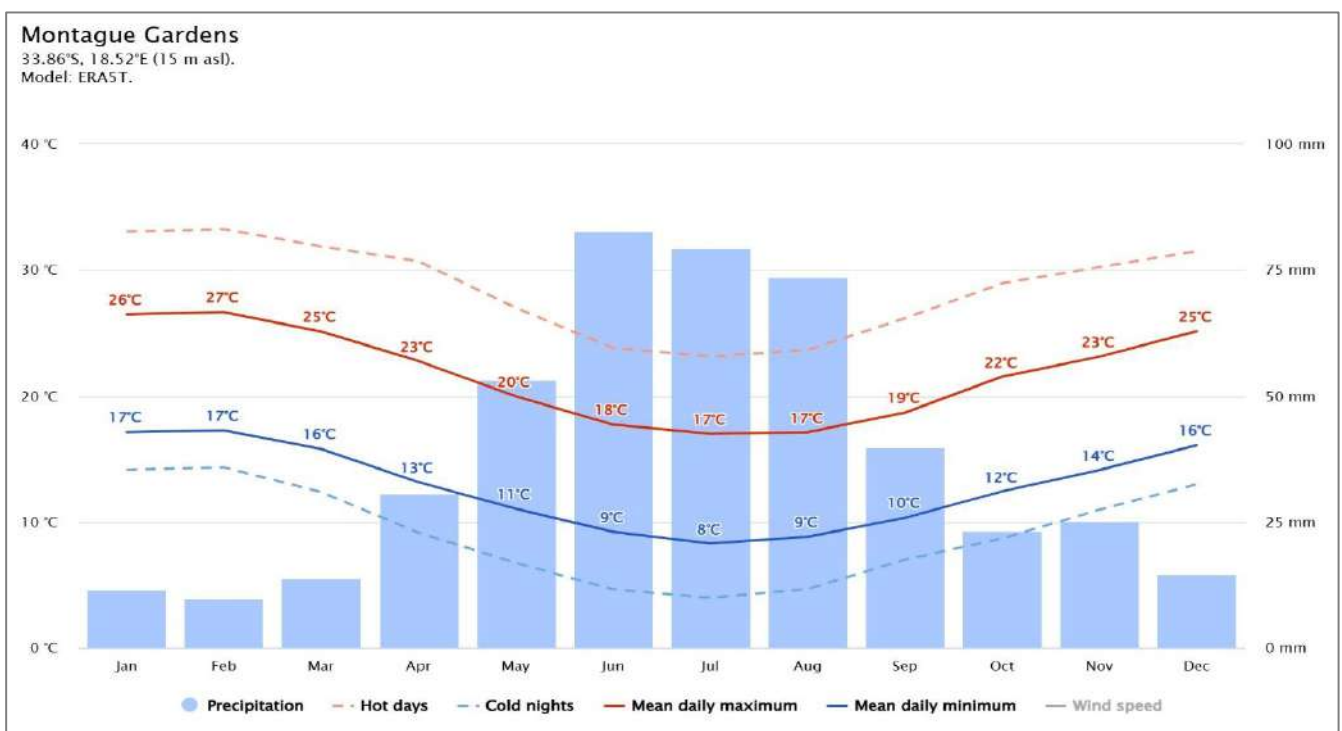


Figure 7: Mean temperatures and precipitation (Meteoblue, 2024)

8.1.1. Mean Monthly Wind Direction and Speed

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

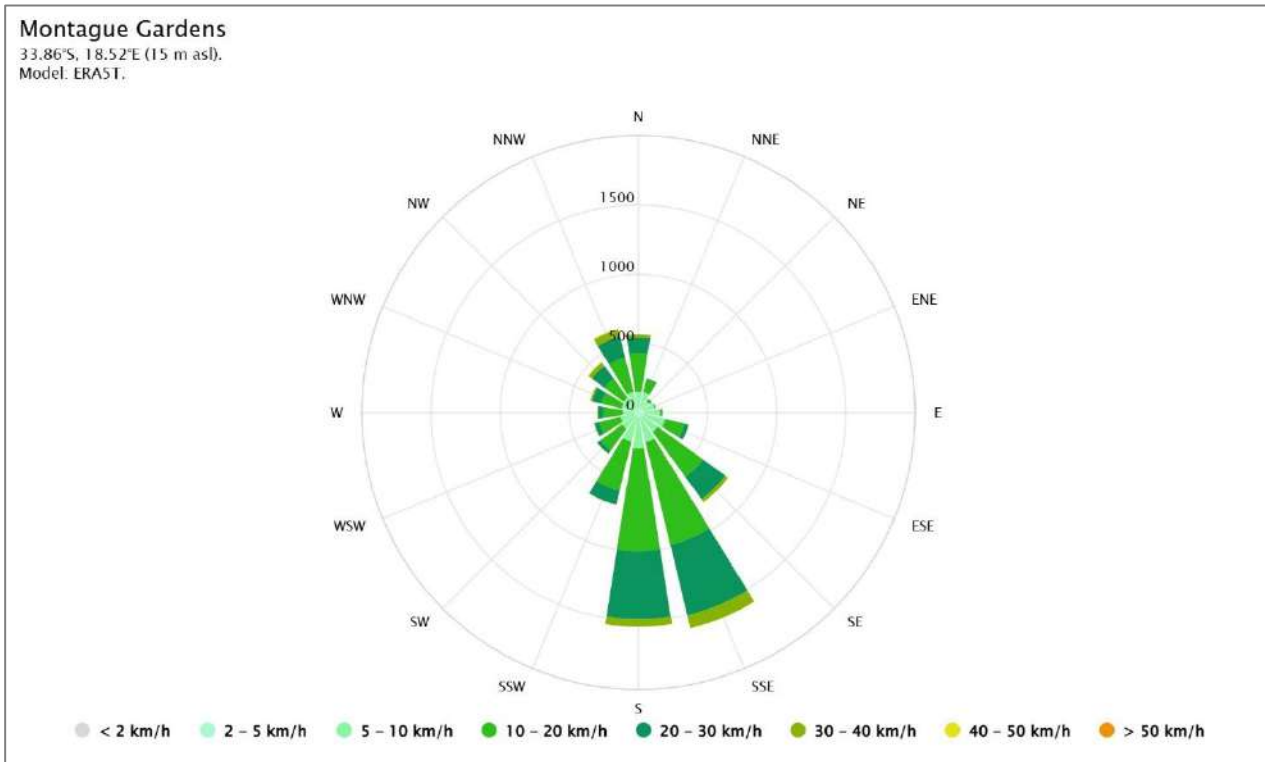


Figure 8: Montague Gardens, Cape Town Annual Wind Rose

8.2. Hydrology

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

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

8.3. Topography

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

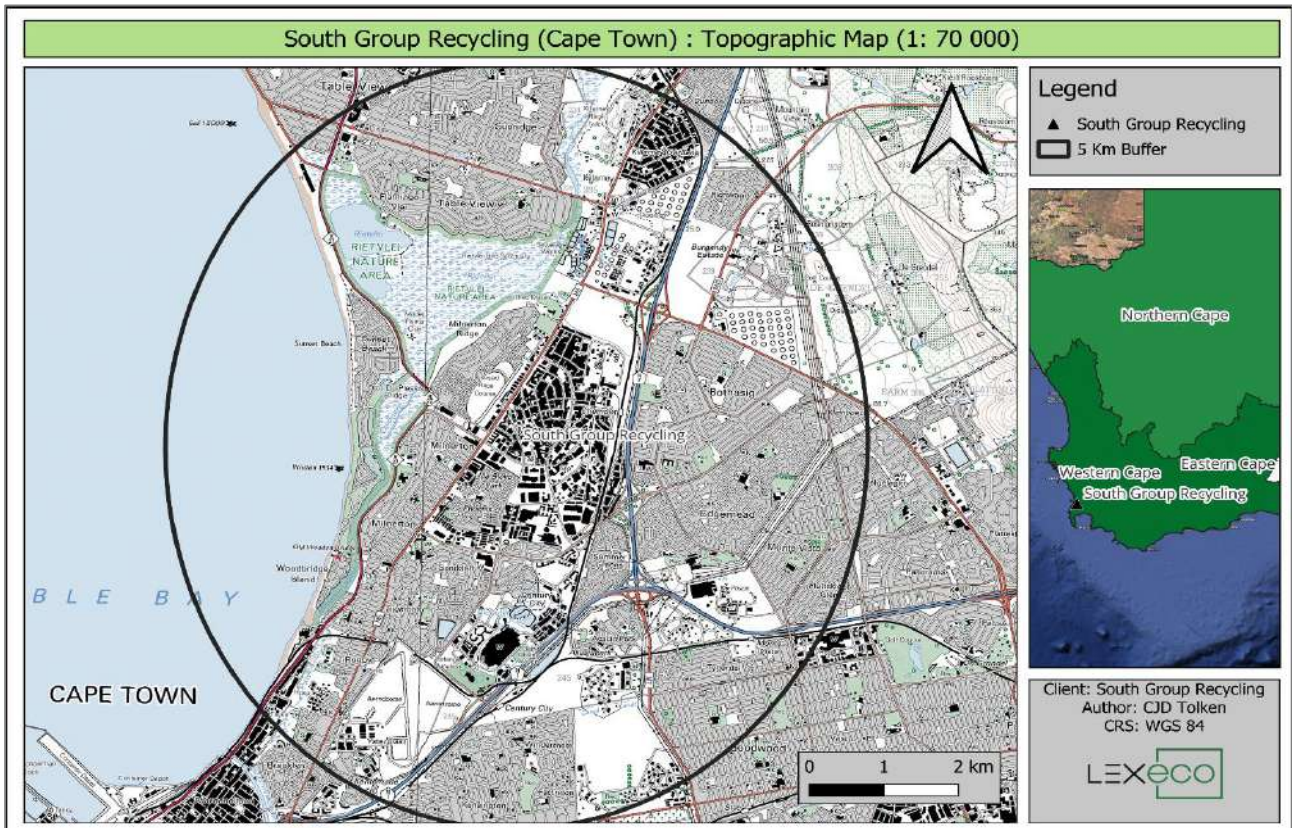


Figure 9: South Group Recycling, Cape Town Topographic Map

8.4. Geology and Soils

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

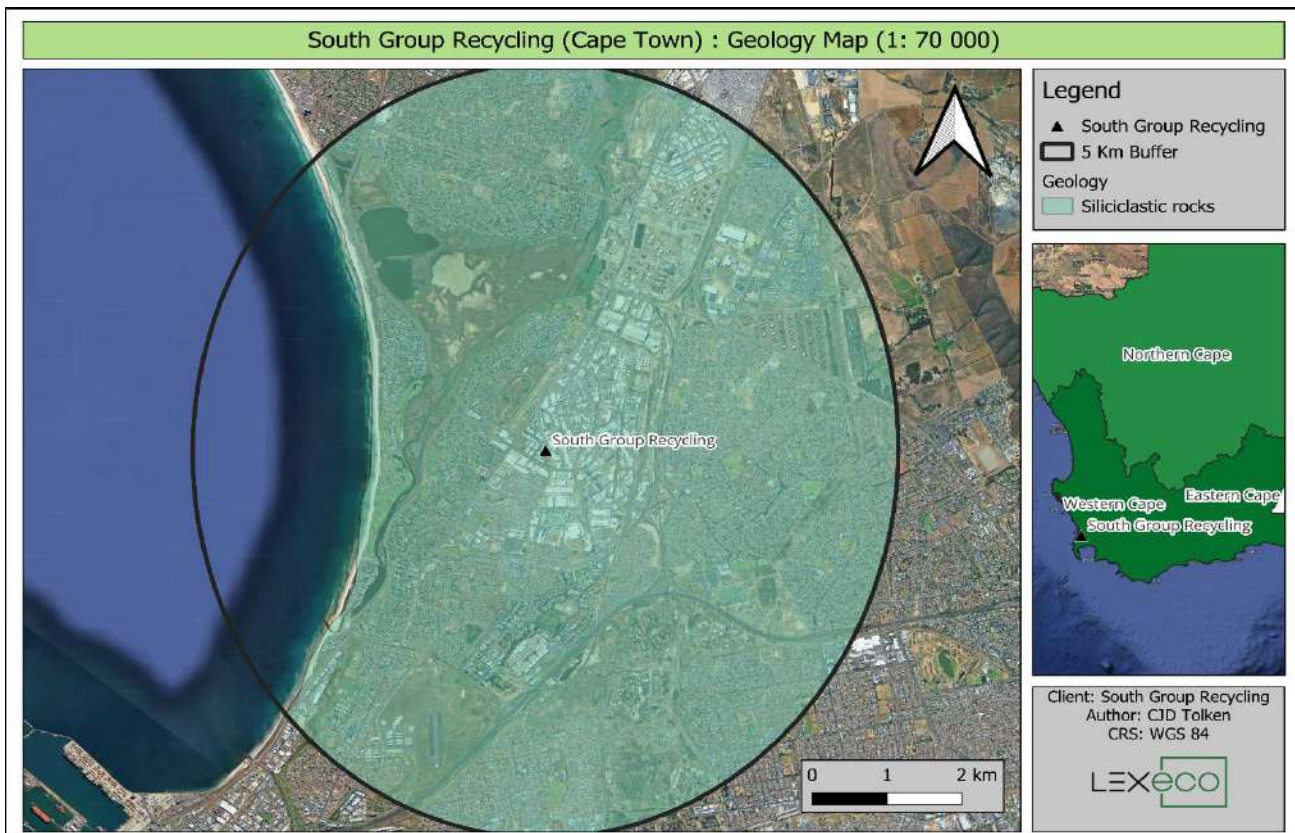


Figure 10: Area Geology and Soil Composition

8.5. Vegetation

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

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

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

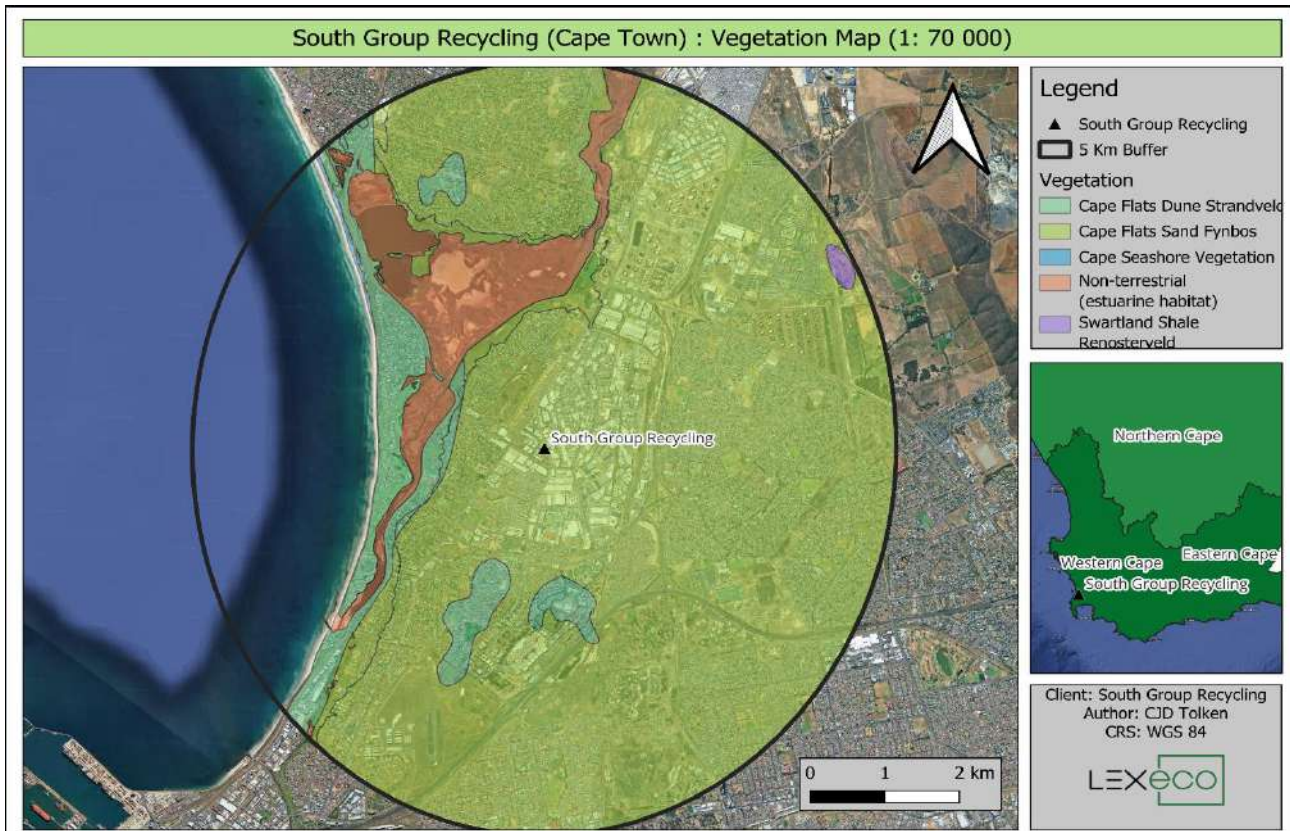


Figure 11: Area Vegetation

8.6. Socio-Economic

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

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

Table 8: Demographic Information for City of Cape Town

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

8.7. Site Verifications

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

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

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

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

8.7.1. Agriculture and Land Use

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

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



Figure 12: Aerial View of South Group Cape Town



Figure 13: Property Zoning according to the COCT SDF



Figure 14: Montague Gardens and Surrounds Land Use Map



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



Photo 2: Product packaging and storage



Photo 3: General view of warehouse and operational areas

Photo 4: General view of warehouse and operational areas

8.7.2. Terrestrial Biodiversity

The terrestrial biodiversity in Montague Gardens, Cape Town, is heavily degraded due to extensive historical development, infrastructure, and alien vegetation. The area was originally Swartland Granite Renosterveld, but human activity has left very little indigenous vegetation. Loss of habitat has led to the migration of indigenous fauna to outlying areas and or protected areas within or surrounding the greater Cape Town region. Conservation of protected areas is considered a crucial step in protecting what is left of the natural biomes and ecosystems. Limiting land development and encroachment of alien invasive species have become a key focus in the conservation efforts implemented by the City of Cape Town.

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

8.7.3. Surface Water and Wetlands

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

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

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

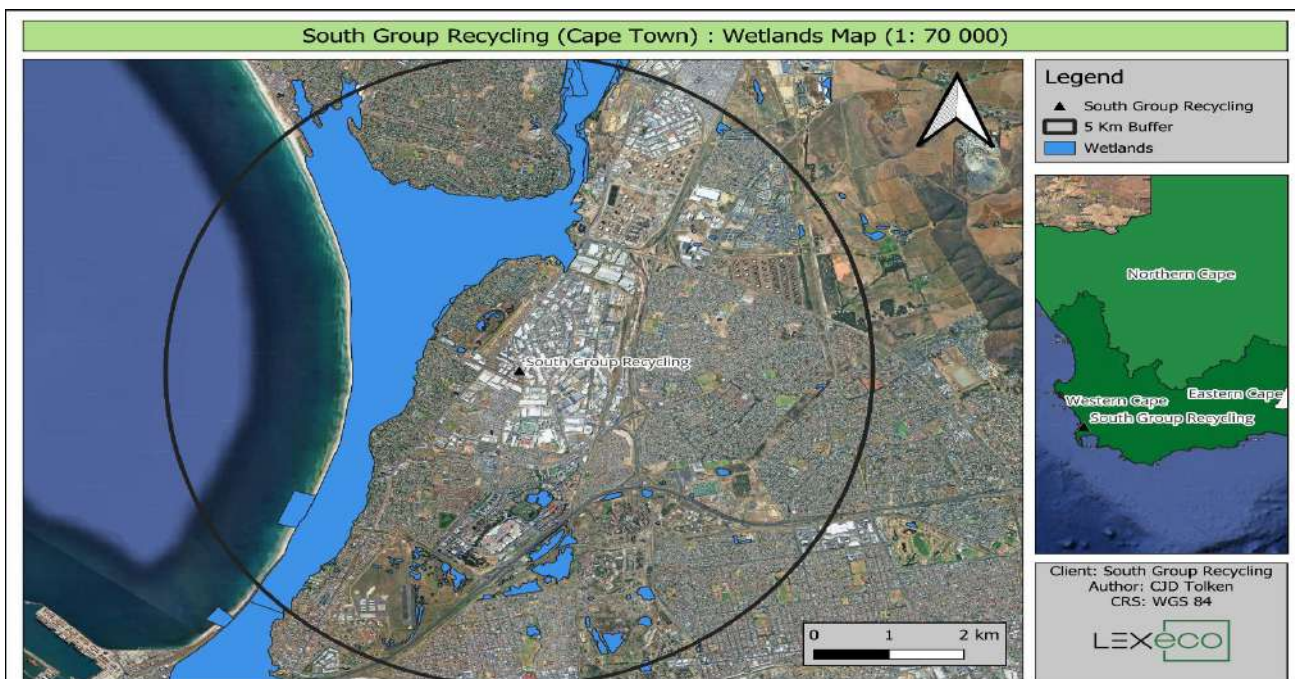


Figure 15: Area Hydrology, South Group, Cape Town

8.7.4. Palaeontology, Archaeology and Cultural Heritage

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

8.7.5. Civil Aviation and Defence

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

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

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

8.7.6. Noise

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

8.7.7. Traffic

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

8.7.8. Air Quality

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

Between the months of May to August, air quality tends to decrease due to low-level temperature inversions, where a warm air layer traps cooler, "polluted" air near the surface, preventing it from dispersing. This phenomenon is worsened by the city's topography, which limits ventilation. Emissions such as Particulate Matter (PM) is generate daily by both the natural environment and human activity. Industrial operations, incomplete combustion and burning of fossil fuels as well as agricultural activity all contribute to air quality in the area. Fine particulate matter (PM), especially PM10 and PM2.5 are generated and emitted by various combustion processes and can penetrate deep into the lungs, posing significant health risks. In addition to PM emissions, noxious gasses such as Nitrogen oxides (NOx) and Carbon Monoxide (CO), Sulphur Dioxide (SO₂), all generate form combustion operations and burning of fossil fuels also

negatively impact air quality leading to ozone depletion and finally global warming. Reducing them is therefore beneficial not only for people's health but also for climate change mitigation.

Air quality in and around Cape Town is considered to be moderate to good for about 10 months of the year. This means that the recorded figures are between 12 and 35 $\mu\text{g}/\text{m}^3$. May to August tends to record the worst figures of between 35 and 54 $\mu\text{g}/\text{m}^3$ which classified it as being "Unhealthy for sensitive groups".

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

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

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

Refer to Annexure M of this report for a copy of the draft Fugitive Emissions Management Plan developed for the proposed operations.

8.8. Specialists Studies

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

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

Table 9: National Screening Tool Site Sensitivities

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

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

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

8.8.1. Specialist Studies

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

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

Table 10: Motivation for Exclusion of Specialist Studies Identified by the National Screening

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
<p>Agricultural Impact Assessment</p>	<p>The South Group, Cape Town operations are located within a pre-existing warehouse which forms part an established industrial area.</p> <p>The existing warehouse will continue to be used in its current state. Installation of the equipment needed to undertake the proposed recycling, recovery and treatment of electronic waste and spent catalytic convertors will not require any alterations, extensions or additional development. No land clearance, soil disturbance or development beyond the footprint of the existing warehouse will be required.</p> <p>No agricultural activity or development is present on site. As such, no direct or indirect impacts on the area’s agricultural operations are anticipated.</p> <p>No specialist impact assessments will therefore be undertaken other than the Impact Assessment during the EIR phase of this application. All aspects and impacts identified will be addressed by recommending relevant mitigation measures. All mitigation measures will be aimed at reducing the risk of the identified impact and will be incorporated into an Environmental Management Programme (EMPr) to be approved by the Competent Authority.</p>	<p>Refer to Figure 12: Aerial View of South Group Cape Town Figure 12 for an aerial view of the site and surroundings and Figure 14 for a map indicating relevant surrounding land use. Also refer to Figure 13 for a map showing the property zoning based on the 2026 City of Cape Town’s Spatial Development Farmwork, which confirms the sites Industrial Zoning status.</p> <p>Also refer to Annexure H of this report for site photos showing the extent and status of ongoing industrial activities.</p> <p>A full copy of the site verification report is also attached to this report under Annexure G.</p>

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Terrestrial Biodiversity Impact Assessment	<p>The South Group, Cape Town operations are located within a pre-existing warehouse which is located in an established industrial area with no natural vegetation remaining.</p>	<p>Refer to Figure 12: Aerial View of South Group Cape Town Figure 12 for an aerial view of the site and surroundings and Figure 14 for a map indicating relevant surrounding land use. Also refer to Figure 13 for a map showing the property zoning based on the 2026 City of Cape Town’s Spatial Development Framework, which confirms the sites Industrial Zoning status.</p> <p>Also refer to Annexure H of this report for site photos showing the extent and status of ongoing industrial activities.</p> <p>A full copy of the site verification report is also attached to this report under Annexure G.</p>
Plant Species Assessment	<p>The existing warehouse will continue to be used in its current state. Installation of the equipment needed to undertake the proposed recycling, recovery and treatment of electronic waste and spent catalytic convertors will not require any alterations or extension to the warehouse or industrial property’s footprint. No development requiring the clearance of land or removal of natural vegetation will be required, thus avoiding any impact on natural vegetation, animal species and overall terrestrial biodiversity in the area.</p>	
Animal Species Assessment	<p>The potential presence of identified terrestrial species such as the Westcoast Flightless Dung Beetle, Peringuey’s Meadow Katydid, or the bladder grasshopper is considered to be low.</p> <p>Industrialisation and overall development of the area have resulted in widespread loss of indigenous vegetation and supporting habitat which support the occurrence of the identified species.</p> <p>No impacts on terrestrial biodiversity, animal species or plant species are anticipated. No specialist assessments in terms of terrestrial Biodiversity, Plant Species or Animal Species will therefore be undertaken.</p>	

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Archaeological and Cultural Heritage Impact Assessment	The proposed waste management activities to be undertaken by South Group, Cape Town will not have any impact on the regions archaeological, palaeontological or cultural heritage resources. Operations will be housed within an existing warehouse, in an established and industrially zoned area. No extension or alteration to the building and or operational footprint will be required, avoiding land disturbance all together.	The South Group, Cape Town operations are located in the Montague Gardens area which according to the South African Heritage and Resource Information System ("SAHRIS") (https://sahris.org.za/nhsmap) does not include any registered heritage, archaeological or paleontological sites within a 5 km radius. Refer to Annexure G (Site Verification Report). Also refer to Annexure H of this report for site photos.
Palaeontological Impact Assessment	It is therefore the opinion of the EAP that an Archaeological and Cultural Heritage Impact Assessment and Palaeontological Impact Assessment is not required for the proposed waste management activity	
Aquatic Biodiversity Impact Assessment	<p>No natural water resources are located on or within direct vicinity to the project site. Lack of any naturally occurring water resources on site limit the potential for aquatic biodiversity.</p> <p>The proposed waste management activities to be undertaken by South Group Recycling, Cape Town will not have any impacts on the receiving environment in terms of aquatic biodiversity or naturally occurring water resources.</p> <p>No specialist assessment in terms of Aquatic Biodiversity will be undertaken.</p>	The National Screening Tool yields a low sensitivity towards the Aquatic Biodiversity Theme (Annexure F). The low sensitivity rating in combination with the lack of any water resources on site support the conclusion not to undertake an aquatic biodiversity assessment. Refer to Annexure H for site photos and Annexure G for a full copy of the site verification report.
Hydrology Assessment	The proposed waste manages activities to be undertaken by South Group Recycling, Cape Town will be limited to the boundaries of the	Refer to Annexure H for site photos showing the current status of the site and Annexure G for a full copy of the site verification report.

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
	<p>existing warehouse located on concreted surfaces within an existing warehouse which forms part of an existing industrial area. No construction, earthworks, site clearing, or expansion of the existing footprint is planned or will be required. No alteration to existing drainage patterns, runoff volumes, or infiltration characteristics of the site will occur or be impacted in any way. The warehouse and associated site are equipped with an existing, engineered stormwater drainage system that is designed to manage runoff from the developed site. Stormwater is conveyed via formal infrastructure to the municipal/industrial stormwater network. No modifications to the stormwater system will be required.</p> <p>The proposed application will have no impact on the existing water and sewer infrastructure. The Potsdam Wastewater Treatment Works can therefore accommodate the proposed development.</p> <p>No natural hydrological features such as rivers, wetlands, floodplains, or drainage lines are present on site or within direct vicinity to the warehouse and or industrial property. The proposed site as well as local receiving environment is therefore not considered hydrologically sensitive.</p> <p>No impact to the areas hydrological status us therefore anticipated. No hydrological assessment will therefore be undertaken.</p>	<p>The City of Cape Town, Water and Sanitation Department also confirmed that the proposed project will have no impact on the existing water and sewer infrastructure at this point therefore confirmation of spare capacity of the existing infrastructure will not be required. The Water and Sanitation Department can accommodate the proposed development.</p>

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
Noise Impact Assessment	<p>Based on the industrial setting of the site, the nature of the proposed activity, and the lack of sensitive receptors, the potential for significant noise impacts is negligible. The undertaking of a Noise Impact Assessment is therefore, in the opinion of the EAP, not required.</p> <p>Potential noise impacts will be assessed as part of the impact assessment process. Relevant mitigation measures will be assigned and are to be included in the EMPr which will be subject to approval by the Competent Authority.</p>	<p>Refer to Annexure H of this report for site photos showing the extent and status of current industrial operations and Figure 13 of this report confirming the property and area zoning as General Industrial.</p>
Traffic Assessment Impact	<p>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.</p>	<p>Potential traffic impacts were assessed, and appropriate mitigation measures included the draft EMPr attached to this report under Annexure L.</p>
Health Assessment Impact	<p>The South Group operations are managed in line with requirements set out by the National Occupational Health and Safety Act which is aimed at limiting possible health impacts on employees. Operations will be contained to a warehouse structure and will be located on concreted surfaces. Based on the nature of the proposed activity, its location within an established industrial area, and the absence of significant emissions or exposure pathways, potential impacts on</p>	<p>No specialist assessments in terms of health and or socio-economic impacts will be undertaken.</p>

Recommended Specialist Assessment	Motivation for Exclusion of Specialist Study	Supporting Evidence
	human health are expected to be negligible. The undertaking of a Health Impact Assessment, in the opinion of the EAP is therefore not required.	
Socio-Economic Assessment	The proposed site selected for the waste management activities is located within an established industrial, area. The scale of the operation in relation to the area is however considered to be small. Although sustainable employment, skill development and potentially new employment opportunities may be generated the overall impact, even if positive will be low. Undertaking a full scope Socio-Economic Impact Assessment will therefore not be undertaken.	
Ambient Air Quality Impact Assessment	Since South Group propose to undertake the planned recycling, recovery and treatment activities within an existing warehouse, no additional construction will be required. No earth moving or surface area clearance will be required. Operations will be undertaken within the warehouse structure, limiting potential emissions to the ambient atmosphere. Crushing and screening operations will be undertaken indoors as well as under suited vacuum filters which will act as abatement prior to the release of possible PM emissions during operation. The only other impact anticipated would be form vehicle emissions associated with the transport of materials and product.	Potential air quality impacts were assessed as part of the impact assessment process. Relevant mitigation measures have been assigned and included in the draft EMPr which is attached to this report under Annexure L .

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

Relevant impacts associated with the proposed project were assessed and relevant mitigation measures incorporated in the draft EMPr (**Annexure L**).

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

9. PLAN OF STUDY FOR THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

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

Reasonable and feasible alternatives have been included in the assessment with focus on location, technology and the no-go alternative. Refer to **Annexure K**.

9.1. Assessment Methodology

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

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

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

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

Table 11: 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;

$$\text{Significance Rating (SR)} = (\text{Duration} + \text{Probability} + \text{Extent}) \times \text{Severity}$$

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

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

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

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

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

Table 12: Marks Awarded to Duration

Duration	Guideline	Assigned Value
Permanent	Permanent	10
Long Term	As long as the facility is in operation	7

Duration	Guideline	Assigned Value
Medium Term	5 – 10 years	5
Short Term	0-4 years	3

Table 13: 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 14: 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 15: Marks Awarded to Severity

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

Impacts without mitigation measures are not considered representative of the proposed project's actual extent of impact. The residual impact is what remains following the application of mitigation measures and

is thus the final level of impact associated with the development. Residual impacts also serve as the focus of management and monitoring activities during project implementation to verify that actual impacts are the same as those predicted in this report.

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

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



Figure 16: Mitigation Hierarchy

Calculation of the Residual Risk Rating is calculated as follows;

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

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

Degree to which the impact can be reversed:

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

Table 16: 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 17: Degree to which an Impact can be Reversed

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

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

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

10. IDENTIFIED IMPACTS AND PROPOSED MITIGATION MEASURES

10.1. Environmental Assessment Outcomes - Identified Aspects and Impacts

Table 18 below summarises the environmental aspects and impacts identified during the impact assessment. Mitigation measures were developed in accordance with the identified impacts and included

in the Environmental Management Program (EMPr) which is also attached to this report under **Annexure L**. The EMPr will become a working document which will be implemented by the facility on an on-going basis to mitigate potential impacts associated with daily operation.

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.

Table 18: Identified Impacts

ENVIRONMENTAL ASPECTS ASSOCIATED WITH THE PROPOSED ACTIVITIES	IDENTIFIED IMPACTS
Air Quality	<ul style="list-style-type: none"> - Deterioration in local air quality, particularly within and immediately surrounding the project site due to the generation of fugitive dust emissions and the release of greenhouse gas emissions - Generation of offensive odours leading to nuisance conditions to surrounding landowners and occupants
Waste Management	<ul style="list-style-type: none"> - Littering, visual impacts, odour generation, and attraction of pests and vermin if not properly managed - Visual degradation of the site leading to nuisance conditions to surrounding land users and the attraction of vermin - Potential contamination of soil, surface water, and groundwater if improperly handled or stored - Risk of hydrocarbon spills, leaks & site fires - Potential cross-contamination of recyclable, general, and hazardous waste if inadequate waste management practices are implemented
Water and Soil Pollution / Natural Resources	<ul style="list-style-type: none"> - Soil, surface water and potentially ground water contamination - Potential storm water contamination - Maintenance of equipment, vehicles or machines posing a risk of hydrocarbon leaks leading to soil or potential surface water or storm water contamination - Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination
Socioeconomics	<ul style="list-style-type: none"> - Loss of employment opportunities when site closes - Generation of employment opportunities during the operational phase - Financial contributions through taxes and salaries
Traffic	<ul style="list-style-type: none"> - Increased traffic congestion - Damage to property - Degradation of road and traffic infrastructure
Noise	<ul style="list-style-type: none"> - Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss - Nuisance conditions to surrounding landowners and occupants due to high noise levels during the operational phase
Health and Safety	<ul style="list-style-type: none"> - Personal injuries - Noise induced hearing loss - Tripping hazards

	<ul style="list-style-type: none"> - Falling objects - Exposure to fine dust
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10.2. Proposed Mitigation Measures

Based on the aspects and impacts identified, the following mitigation measures are proposed to manage the identified impacts associated with the proposed waste management activities to be undertaken by South Group Recycling at their Cape Town operations:

- Compliance with relevant legislations and municipal by-laws, including -
 - Compliance with the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), as amended
 - National Ambient Air Quality Standards (GN 1210) as amended
 - National Dust Control Regulations, GN 7335 of 31 March 2026
 - City of Cape Town Air Quality Management By-Law (Provincial Gazette No: 7662 dated 17 August 2016) as amended -
 - Section 4: Duty of care (Reasonable measures to prevent air pollution).
 - Section 4: Duty of care (Reasonable measures to prevent air pollution).
 - Section 19: Emissions caused by open burning (Authorisation of open burning and burning of material).
 - Section 25: Emissions that cause a nuisance (Prohibition of emissions that cause nuisances).
 - Occupational Health and Safety Act (Act No. 85 of 1993)
- Develop and implement relevant operational procedures based on the content of the WML, EMP, National Norms and Standards (as applicable) and associated legislation
- Waste (general and hazardous) must be correctly managed to prevent nuisance conditions or environmental pollution,
- Implement and maintain an external complaints management procedure for the recording and management of complaints should they be received,
- Implement and maintain strict housekeeping measures
- Development and implementation of site inspections and checks
- Development and implementation of a training matrix to ensure appropriate training and awareness is maintained
- Maintenance of relevant records for auditing purposes



Identified environmental impacts associated with the proposed project have been assigned mitigation measures to manage the impacts. Refer to **Annexure L** for the full environmental impact assessment tables and **Annexure L** for a copy of the EMPr.

10.3. Impact ratings After Mitigation Measures have been Applied

The 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.

11. ENVIRONMENTAL IMPACT ASSESSMENT

The EIA revealed that the environmental impacts associated with the proposed project will be of a moderate to high significance prior to the application of mitigation. The application of the proposed mitigation measures contained in the EMPr will lower the significance ratings and the impacts will be low after mitigation measures have been applied. The environmental aspects and potential impacts associated with the construction, operational and decommissioning phases of the proposed project are summarised in the Tables below.

11.1. Environmental Impact Assessment – Construction Phase

Table 19: Impact Assessment - Construction Phase

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Air Quality	Release of greenhouse gas emissions from construction vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Severe	<ul style="list-style-type: none"> - All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications - Minimise vehicle and equipment idling times - Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels - Burning of waste or open fires are not permitted on site - Maintain vehicle inspections to identify the release of black smoke, indicating the need for maintenance or repairs - Implement a fugitive dust emission management plan in order to manage and minimise fugitive dust emissions throughout the construction phase 	Low
	Burning of waste & open fires on site			
	Fugitive dust emissions generated from construction activities			
Waste Management	Increased waste volumes generated due to construction activities	High	<ul style="list-style-type: none"> - A site-specific Waste Management Plan to be developed and implemented - Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers - Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted 	Low
	Storage of waste on-site			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, chemicals) from construction equipment and or vehicle maintenance		<ul style="list-style-type: none"> - to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal - Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information - Labelled containers are to be available on site for the source separation and collection of waste prior to being removed from site for recycling, recovery, treatment - Train employees and operators on approved waste management measures to be implemented, including the correct disposal, separation and handling methods as applicable 	
	Waste removal and transport			
	Waste storage and accumulation due to construction activities			
	Poor housekeeping and waste management practices			
Water and Soil Pollution	Illegal dumping of waste	High	<ul style="list-style-type: none"> - Construction vehicles, equipment or machinery which is no longer in use must be removed from site - Operations should be confined to the bounds of the warehouse leased by South Group Recycling as far as reasonably possible - No waste generated during the construction phase is to be stored outside the warehouse - All hydrocarbon spills or vehicle and or equipment leaks must be cleaned up as soon as they occur 	Insignificant
	Hydrocarbon spills and leaks			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Oil leaks from construction vehicles, equipment and machinery		<ul style="list-style-type: none"> - The facility is to develop and implement a spill response procedure - All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications - All operational activities are to be housed under the cover of the warehouse - Strict housekeeping measures are to be maintained throughout the construction phase 	
	Hazardous waste coming into contact with storm water leading to leachate generation			
Noise	Construction activities generating higher than normal noise levels	Moderate	<ul style="list-style-type: none"> - Construction activities are to be restricted to normal operating hours maintained by South Group Recycling - All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection. - Employees are to be made aware of noise induced hearing loss and appropriate prevention measures - An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party 	Low
	Construction activities generating higher than normal noise levels			
	Use of construction equipment and machinery (jackhammers, grinders, welding machines, etc.)			
Traffic	Increased number of vehicles traveling to and from site	Moderate		Insignificant
	Movement of construction vehicles both on and around the site			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)	High	<ul style="list-style-type: none"> - Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable - No parking of trucks or vehicles outside the boundary of the operational site is permitted - All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations. - No vehicles are to be overloaded - All drivers are to be licensed in accordance with the vehicle and or equipment being driven 	Low
	Movement of construction vehicles			
	Moving equipment			
	Stacking of material			
	Sharp objects, uneven surfaces and tripping hazards			
	Use and handling of heavy machinery and equipment			

11.2. Environmental Impact Assessment – Operational Phase

Table 20: Impact Assessment – Operational Phase

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	High	<ul style="list-style-type: none"> - Draft and implement a Fugitive Emissions Management Plan (FEMP) detailing odour and dust nuisance mitigation measures - Crushing and milling activities to be equipped with an extraction unit suitable in capturing fugitive emissions. 	Insignificant
	Burning of waste & open fires			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Crushing and screening of catalytic converter substrate to a fine powder	High	<ul style="list-style-type: none"> - Warehouse must be well ventilated and equipped with a suitable ventilation system to allow effective air flow through operational areas - Strict housekeeping measures to be maintained throughout operational areas - All crushing, screening and milling activities are to be housed within the warehouse structure - All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications - Minimize vehicle and equipment idling times - Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels - Burning of waste or open fires are not permitted on site 	Low
	Handling, loading and offloading of waste			
	Fumes and emissions generated from e-waste treatment activities			
	Generation of offensive odors			
Waste Management	Waste generated form operational activities	High	<ul style="list-style-type: none"> - A site-specific Waste Management Plan to be developed and implemented - Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers - Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste 	Low
	Storage of waste on-site			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, e-waste, chemicals) from operational equipment and or vehicle maintenance	High	<ul style="list-style-type: none"> for the intended recycling, recovery, treatment or disposal. - Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information - Labelled containers are to be available on site for the source separation and collection of waste prior to being removed from site for recycling, recovery, treatment - Employees and operators to be trained on approved waste management measures to be implemented, including the correct disposal, separation and handling methods as applicable - Contractors to be provided a copy of the WML as well as EMPr prior to commencement of any activity on site 	Low
	Waste removal and transport			
	Poor housekeeping and waste management practices			
Water and Soil Pollution	Illegal dumping of waste	High	<ul style="list-style-type: none"> - Operations should be confined to the boundaries of the warehouse leased by South Group Recycling - All waste related activities and associated operations to be located on concreted or impermeable surfaces - No waste is to be stored outside the warehouse - All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur 	Low
	Hydrocarbon spills			
	Oil leaks from vehicles, equipment and machinery			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Hazardous waste coming into contact with storm water leading to leachate generation		<ul style="list-style-type: none"> - The facility is to develop and implement a spill response procedure - All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications - All maintenance undertaken outside buildings (i.e. on roads, paving or any exposed area exposed) must be undertaken with drip trays to capture any spills or leaks 	
	Maintenance of equipment machinery and vehicles			
	Vehicle or machinery malfunction			
Noise	Operational activities generating high noise levels	High	<ul style="list-style-type: none"> - Waste recycling, recovery and treatment activities are to be restricted to normal operating hours maintained by South Group Recycling - All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection. - Employees are to be made aware of noise induced hearing loss and appropriate prevention measures - An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party - Occupational noise surveys to be undertaken in accordance with the Occupational Health and Safety Act and associated regulations 	Low
	Use of machinery and equipment and machinery (grinders, welding machines, etc.			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Traffic	Increased number of vehicles traveling to and from site	Moderate	<ul style="list-style-type: none"> - Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable - No parking of trucks or vehicles outside the boundary of the operational site is permitted - All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations - No vehicles are to be overloaded 	Low
	Movement of vehicles both on and around the site			
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)	Moderate	<ul style="list-style-type: none"> - Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained - All equipment used on site may only be operated by appropriately trained and / or licensed personnel - PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g., hard hats, safety boots, reflective vests, masks etc.) - Contractors are to submit a safety file to South Group Recycling for approval prior to undertaking any work on site - Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry - All ablution facilities, kitchen, changing rooms, and general factory/offices areas must be cleaned and maintained daily to ensure a clean and hygienic work environment for all employees. 	Low
	Movement of vehicles			
	Moving equipment			
	Stacking of material			
	Sharp objects, uneven surfaces and tripping hazards			
	Use and handling of heavy machinery and equipment			

11.3. Environmental Impact Assessment – Decommissioning Phase

The table below summarises the anticipated outcomes of the associated with the future decommissioning phase. As and when decommissioning and closure of the waste management facility becomes applicable, South Group Recycling will be required to apply for the relevant closure in terms of the then applicable regulations. As part of the closure application process, a site closure plan will need to be developed and approved by the relevant Competent Authority. The below assessment will then be revised and aligned with the applicable scope.

Table 21: Impact Assessment – Operational Phase

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Moderate	<ul style="list-style-type: none"> - The approved fugitive emissions management plan is to be revised and updated to align with planned decommissioning activities - Dust control measures to be implemented during the decommissioning phase - Strict housekeeping measures to be maintained throughout decommissioning phase - Minimize vehicle and equipment idling times - Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels - Burning of waste or open fires are not permitted on site - Gas cutting and or grinding must be undertaken in well-ventilated areas or in open air 	Insignificant
	Burning of waste & open fires			
	Release of smoke form grinding activities when decommissioning equipment, machinery or infrastructure			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Waste Management	Waste generated from decommissioning activities	High	<ul style="list-style-type: none"> - Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers - Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal. - Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information - Contractors to be provided with a copy of the WML as well as the approved closure plan prior to commencement of any activity on site - Waste generated during the decommissioning phase is to be separated at source in order to limit cross contamination between general and hazardous waste 	Low
	Dismantling of machines and equipment			
	Generation of building rubble			
	Storage of waste on-site			
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, hydrocarbons) from decommissioning machinery and equipment			
Water and Soil Pollution	Illegal dumping of waste	Moderate	<ul style="list-style-type: none"> - Concrete or impermeable surfaces are to be kept intact as far as reasonably possible before being removed as part of decommissioning operations - A spill response procedure is to be implemented throughout the decommissioning phase - A spill response kit to be kept on site and used for the cleanup of spills as and when they occur 	Low
	Hydrocarbon spills			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Oil leaks from vehicles, equipment and machinery		<ul style="list-style-type: none"> - An incident register must be maintained throughout the decommissioning phase - Vehicles and equipment stored on site for periods exceeding 24 hours are to be equipped with drip trays - Use of drip trays a, tarps and absorbent material must be promoted and kept on hand when manually decommissioning or disassembling equipment and or machinery that may contain hydrocarbon fluids or hydraulics - Vehicles and equipment used for decommissioning activities must be well maintained and serviced in accordance with manufacturer specifications 	
	Hazardous waste coming into contact with storm water leading to leachate generation			
	Vehicle or machinery malfunction			
Noise	Decommissioning activities generating high noise levels	High	<ul style="list-style-type: none"> - Decommissioning activities are to be restricted to normal operating hours (06:00 - 18:00) - All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection. - Noise generating activities must be restricted to the warehouse which will act as a screen - An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party 	Moderate
	Use of heavy machinery and equipment (grinders, welding machines, etc.)			
Socio Economic	Loss of employment opportunities due to site closure and decommissioning	High	<ul style="list-style-type: none"> - Engagement with employees in advance whilst following legal requirements. 	High

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Loss of revenue due to dated technology and loss of production potential.			

11.4. Environmental Impact Assessment – No-Go Alternative (Rejection of WML application and continuation of operations as is)

The No-go alternative as set out under Section 7 of this report will entail the rejection of this application. South Group Recycling, Cape Town will not be able to install additional equipment which will be used to recycle, recover or treat the approved waste streams (e-waste and spent catalytic convertors). As a result, no recycling, recovery and or treatment of waste will be undertaken. The operations will be forced to continue with the sourcing, sorting, temporary storage and trading of e-waste at their current capacity.

Overall impacts associated with the No-Go Alternative yielded high to severe risk ratings before the implementation or application of relevant mitigation measures. The application of mitigation measures reduces the significance ratings.

The no-go alternative will lead to adverse environmental impacts as well as social and economic losses to the local community who will no longer gain favour from the operations and its associated activities. Based hereon, the no-go alternative is not preferred.

Table 22: Impact Assessment – No-Go Alternative

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Waste	E-waste that could have been recycled or recovered may be disposed of at landfill facilities	Severe		High

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	<p>Increased demand on limited landfill airspace</p> <p>Increased risk of illegal or unlicensed recycling, recovery and treatment operations</p> <p>Failure to support national waste minimisation, recycling and resource recovery targets</p> <p>Loss of potentially recoverable materials such as metals, plastics and electronic components</p>		<ul style="list-style-type: none"> - Continue to segregate and store e-waste generated on-site and send it to appropriately authorised recycling facilities where feasible - Ensure all e-waste is transported by registered waste transporters to authorised facilities and maintain waste manifests and disposal records - Continue participating in Extended Producer Responsibility (EPR) schemes and industry recycling initiatives 	
Loss of Natural Resources Soil and Water Impacts	<p>Valuable materials such as copper, aluminium, steel, gold and plastics will not be recovered and reintroduced into the economy</p> <p>Less availability of recycled or recovered metals leading to a higher need and reliance on mined materials and resources for manufacturing purposes</p>	Severe	<ul style="list-style-type: none"> - Investigate partnerships with licensed third-party e-waste recyclers to recover valuable materials from e-waste streams 	High
Noise	Operational activities generating high noise levels	High	<ul style="list-style-type: none"> - Waste recycling, recovery and treatment activities are to be restricted to normal operating hours maintained by South Group Recycling - An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party 	Moderate
Traffic	Movement of vehicles both on and around the site	Moderate	<ul style="list-style-type: none"> - Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable - No parking of trucks or vehicles outside the boundary of the operational site is permitted 	Low

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
			<ul style="list-style-type: none"> - All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations 	
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)	Moderate	<ul style="list-style-type: none"> - Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained - PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g., hard hats, safety boots, reflective vests, masks etc.) - Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry - All ablution facilities, kitchen, changing rooms, and general factory/offices areas must be cleaned and maintained to ensure a clean and hygienic work environment for all employees. 	Low
	Movement of vehicles			
	Stacking of material			
	Sharp objects, uneven surfaces and tripping hazards			
Socio-economic	Potential direct and indirect jobs associated with the expanded facility would not be created	Severe	<ul style="list-style-type: none"> - Source services and materials locally where possible to maintain some level of economic contribution 	Severe
	Local businesses and service providers may not benefit from increased economic activity associated with the project			

11.5. Environmental Impact Assessment –Alternative Location

Table 23: Impact Assessment – Alternative Location

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Severe	<ul style="list-style-type: none"> - Draft and implement a Fugitive Emissions Management Plan (FEMP) detailing odour and dust nuisance mitigation measures - Strict housekeeping measures to be maintained - Construction and or development areas are to be demarcated to ensure that operations are maintained to the authorised location - Minimize vehicle and equipment idling times 	Moderate
	Vegetation removal and movement of construction equipment and vehicles over unpaved roads and surfaces during construction and or development			
	Handling, loading and offloading of construction materials during development			
Waste Management	Less availability of recycled or recovered metals leading to a higher need and reliance on mined materials and resources for manufacturing purposes	Severe	<ul style="list-style-type: none"> - Continue to segregate and store e-waste generated on-site and send it to appropriately authorised recycling facilities where feasible - Ensure all e-waste is transported by registered waste transporters to authorised facilities and maintain waste manifests and disposal records - Continue participating in Extended Producer Responsibility (EPR) schemes and industry recycling initiatives 	High
	Storage of waste on-site			
	Failure to support national waste minimisation, recycling and resource recovery targets whilst development is ongoing and authorisations are pending			
Water and Soil Pollution	Loss of potentially recoverable materials such as metals, plastics and electronic components whilst development is ongoing and authorisations are pending	High	<ul style="list-style-type: none"> - Operations should be confined to the boundaries of the warehouse leased by South Group Recycling 	Low
	Illegal dumping of waste			
	Hydrocarbon spills			
	Oil leaks from vehicles, equipment and machinery			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Hazardous waste coming into contact with storm water leading to leachate generation		<ul style="list-style-type: none"> - All waste related activities and associated operations to be located on concreted or impermeable surfaces - No waste is to be stored outside the warehouse - All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur - The facility is to develop and implement a spill response procedure - All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications - All maintenance undertaken outside buildings (i.e. on roads, paving or any exposed area exposed) must be undertaken with drip trays to capture any spills or leaks 	
	Maintenance of equipment machinery and vehicles			
	Vehicle or machinery malfunction			
Noise	Construction activities generating higher than normal noise levels	Moderate	<ul style="list-style-type: none"> - All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection. - Employees are to be made aware of noise induced hearing loss and appropriate prevention measures - An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party 	Moderate
	Use of construction equipment and machinery (jackhammers, grinders, welding machines, etc.)			
Natural Resources	Site relocation requiring virgin land development	Severe	<ul style="list-style-type: none"> - Undertake a thorough site screening assessment aimed at identifying the best suited location for the new site development 	High
	Development and construction of new roads, access routes and supporting infrastructure			
	Establishment of alternative facility			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
			- Industrially zoned areas as set out in terms of the Municipal Spatial Development Framework must be prioritised for site selection	
Socio Economic	Purchase or leasing of an alternative property	Severe	<ul style="list-style-type: none"> - Communicate the relocation to existing employees and provide relevant support where needed - Continue with operation at the current location as far as reasonably possible before relocating to the new location to limit economic losses - Development site is to be located close to established road networks and logistics routes to limit the requirement for additional developments 	High
	New Environmental authorisation / Waste Management License process will have to be conducted prior to the undertaking of any development activities			
	Alternative site located further from transport routes and residential areas			
	Relocation to alternative site			

11.6. Environmental Impact Assessment –Alternative Technologies

Table 24: Impact Assessment – Alternative Technologies

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Severe	<ul style="list-style-type: none"> - Draft and implement a Fugitive Emissions Management Plan (FEMP) detailing odour and dust nuisance mitigation measures - All crushing, screening, milling, shredding and granulation activities to be equipped with an extraction unit suitable in capturing fugitive emissions. - Warehouse must be well ventilated and equipped with a suitable ventilation system to allow effective air flow through operational areas - Strict housekeeping measures to be maintained throughout operational areas - All crushing, screening, milling, shredding and granulation activities are to be housed within the warehouse structure - All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications 	Low
	Burning of waste & open fires			
	Crushing and screening of catalytic converter substrate to a fine powder			
	Handling, loading and offloading of waste			
	Shredding and granulation of e-waste			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Fumes and emissions generated from e-waste treatment activities		<ul style="list-style-type: none"> - Burning of waste or open fires are not permitted on site 	
Waste Management	Waste handling, transport and processing	High	<ul style="list-style-type: none"> - A site-specific Waste Management Plan to be developed and implemented - Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers - Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal. - Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information - Labelled containers are to be available on site for the source separation and collection of waste prior to being removed from site for recycling, recovery, treatment - Employees and operators to be trained on approved waste management measures to be implemented, 	Low
	Waste generated form operational activities			
	Storage of waste on-site			
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, e-waste, chemicals) from operational equipment and or vehicle maintenance			
	Waste removal and transport			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Poor housekeeping and waste management practices		<ul style="list-style-type: none"> including the correct disposal, separation and handling methods as applicable - Contractors to be provided a copy of the WML as well as EMPr prior to commencement of any activity on site 	
Water and Soil Pollution	Illegal dumping of waste	Severe	<ul style="list-style-type: none"> - Operations should be confined to the boundaries of the warehouse leased by South Group Recycling - All waste related activities and associated operations to be located on concreted or impermeable surfaces - No waste is to be stored outside the warehouse - All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur - The facility is to develop and implement a spill response procedure - All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications - All maintenance undertaken outside buildings (i.e. on roads, paving or any exposed area exposed) must be undertaken with drip trays to capture any spills or leaks - Secondary containment must be provided to capture and contain effluent generated from the wet shredder 	Low
	Hydrocarbon spills			
	Oil leaks from vehicles, equipment and machinery			
	Hazardous waste coming into contact with storm water leading to leachate generation			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
	Maintenance of equipment machinery and vehicles		<ul style="list-style-type: none"> - Waste recycling, recovery and treatment activities are to be restricted to normal operating hours maintained by South Group Recycling - All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection. - Employees are to be made aware of noise induced hearing loss and appropriate prevention measures - An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party - Occupational noise surveys to be undertaken in accordance with the Occupational Health and Safety Act and associated regulations 	
	Vehicle or machinery malfunction			
	Release of "dirty water" or effluent			
Noise	Operational activities generating high noise levels	Severe	<ul style="list-style-type: none"> - Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable - No parking of trucks or vehicles outside the boundary of the operational site is permitted - All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations - No vehicles are to be overloaded 	Moderate
	Use of machinery and equipment and machinery (grinders, welding machines, granulators, shredders, etc.			

ASPECT	ACTIVITY	SIGNIFICANCE RATING BEFORE MITIGATION	PROPOSED MITIGATION MEASURES	SIGNIFICANCE RATING AFTER MITIGATION
Traffic	Increased number of vehicles traveling to and from site	Moderate	<ul style="list-style-type: none"> - Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained - All equipment used on site may only be operated by appropriately trained and / or licensed personnel - PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g., hard hats, safety boots, reflective vests, masks etc.) - Contractors are to submit a safety file to South Group Recycling for approval prior to undertaking any work on site - Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry - All ablution facilities, kitchen, changing rooms, and general factory/offices areas must be cleaned and maintained daily to ensure a clean and hygienic work environment for all employees. 	Low
	Movement of vehicles both on and around the site			
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)			
	Movement of vehicles			
	Moving equipment			
	Stacking of material			
	Sharp objects, uneven surfaces and tripping hazards			
Use and handling of heavy machinery and equipment				
General	Installation and operation of a wet shredder and granulators	Severe	<ul style="list-style-type: none"> - Review and optimise operational layouts where possible - Obtain approval from the land owner before undertaking relevant modifications to existing infrastructure 	Severe

11.7. Specialist Studies and Assessments

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

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

12. CUMULATIVE IMPACTS

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

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

All cumulative impacts were assessed in detail as part of the Impact Assessment summarised in Section 11 of this report. Based on the outcomes, relevant mitigation measures have been recommended and included in the EMPr (**Annexure L**) that South Group will be required to implement in order to avoid negative impact and/or minimise the significance of the impacts identified.

13. ENVIRONMENTAL IMPACT STATEMENT

13.1. Deviations from the Approved Scoping Report and Plan of Study

No deviations from the approved Scoping Report and plan of study have been undertaken or implemented.

13.2. Aspects for inclusion as conditions of the Waste Management License

The proposed mitigation measures as included in Tables 19 to 21 and the Environmental Management Programme (EMPr) are to be included in the authorisation.

South Group Recycling must ensure compliance with, and implementation of the EMPr by:



- Appointing of a suitably qualified individual to oversee implementation of the EMPr during all phases of the project
- To ensure that all staff, contractors and sub-contractors are aware of and understand the requirements of the EMPr and Waste Management License issues in relation to their individual areas of work by:
 - o Developing an induction and training program covering the EMPr, environmental awareness, dealing with environmental incidents and waste management, and
 - o Advising staff, including sub-contractors, of EMPr requirements through an induction program as well as on notice boards (where applicable).

In addition, South Group Recycling should be aware of the City of Cape Town's Waste Management By- Laws and always ensure compliance to these by-laws. All other licences and permits issued to South Group as part the operations should be adhered to.

14. REASONED OPINION OF THE EAP AS TO WHETHER THE ACTIVITY SHOULD OR SHOULD NOT BE AUTHORISED

Based on the findings of the impact assessment in Section 11, the EAP is of the opinion that the Project should be approved. No significant adverse impacts have been identified as the significance of all impacts post-mitigation are Low. No impacts are anticipated to cause irreplaceable loss of resources. The Project entails positive outcomes, particularly in the areas of E-waste recycling, landfill diversion, and the advancement of circular economy principles.

15. PERIOD FOR WHICH THE AUTHORISATION IS REQUIRED

The Waste Management License is required for a period of at least 20 years. Any changes to the Project or approved scope during this period will follow the correct legislative procedures to amend the authorisation, as and when required.

16. PUBLIC PARTICIPATION

A comprehensive public consultation process will be undertaken during 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 and the availability of the Draft Environmental Impact Report for review and comment. Upon conclusion of the Public Participation Process, records of correspondence will be summarised and included in the Final Environmental Impact Report (“EIR”).

16.1. 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 was developed and update throughout the Scoping Phase of this application 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 were also be incorporated.

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

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



Each identified I&AP will be provided with a written notice (either electronically) of the application and be made aware of the availability of the Draft Environmental Impact 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 25 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 Environmental Impact 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 Environmental Impact Report.



Table 25: IAP Register (Restricted)

Department / Representative	Contact Person	Registered as IAP
State Departments and Relevant Authorities		
Department of Forestry Fisheries and the Environment <i>(Competent Authority)</i>	Chief Directorate	
Department of Forestry Fisheries and the Environment	Hazardous Waste Management	
Western Cape Government Department of Environmental Affairs and Development Planning	Directorate: Development Management (Region 1)	
City of Cape Town Municipality	Environmental and Heritage Management Branch Sonja Stemmet Morne Theron	✓
City of Cape Town Municipality	Anela Kondlo Professional Officer: Integrated Planning & Waste Strategy Urban Waste Management	✓
City of Cape Town Municipality	Ward Councillor Sub council 3 Manager Roxanne Moses	
City of Cape Town Municipality	Rabelani Gundula Senior Air Quality Practitioner Specialised Environmental Health Services: Air Quality Management	✓
Heritage Western Cape Heritage Resource Management	Michael Janse van Rensburg Corne Nortje	
South African Civil Aviation Association Authority	Aviation Environmental Compliance Ms. Evelyn Shogole	
National Department of Defence	Mr S.M Dlamini Brig Gen A.M. Mahapa Col R. Maseko Capt B.M. Raphela Mr T.V. Mthombeni	
Precious Metal Regulator	Mmathabo Mngadi	
Landowners and Local Stakeholders		
Landowner BZK Trust	Baruch Katz	✓

Department / Representative	Contact Person	Registered as IAP
South Group Recycling, Cape Town (Applicant)	Director Wayne Clancy	✓
Barpro Storage SA	Reception	
Cape Office Furniture	Managing Director	
Project Pumps	Director Justin Grootman	
Clover S.A. (Pty) Ltd	-	
Nor Marine Cape Town	-	
Calpeda Pumps Southern Africa Pty Ltd	-	
Armor limak	-	
Perfect View Solutions	Peter Jones	
Global Ingredient Trade		
Turner Morris	Office Manager	
Crest	Reception	
Helukabel SA	Reception	
Polyfibre Textiles	David	
Thermo Solutions	-	
SA Sealing Systems	Reception	
B&S Agencies (Pty) Ltd	Reception	
Gasket and Shim Industries		
Vulcan Steel		
Pinnacle ICT Cape Town		
Farber Coachworks Montague Gardens		
Nouum Engineering Pty Ltd	Jonathan Sproat	
Afrigen Biologics & Vaccines	Rajen Naidoo Petro Terblanche	
Afrigen Biologics & Vaccines	Hendrik Bester	✓



16.2. Newspaper Advertisements

An advertisement containing relevant information with regards to the application and proposed project was placed in one (1) local newspaper, namely the Cape Times, which is circulated in the area relevant to the application. Record and proof of placement will be included in the Final Environmental Impact Report.

16.3. Site Notices

A site notice will be placed at a location visible to the public within the surrounding project area. Record and proof of placement will be included in the Final Environmental Impact Report

16.4. 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 email. Record and proof of placement will be included in the Final Environmental Impact Report.

16.5. Circulation of the Draft Scoping Report

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

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

Electronic copies of the Draft Environmental Impact Report were also submitted to relevant Commenting Departments, as well as the Competent Authority (DFFE) for review and comment during the public participation period. Record and proof of placement will be included in the Final Environmental Impact Report.

16.6. Comments and Responses

All the comments and responses received during the Public Participation Process will be recorded and summarised in a single comments and responses 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 will be included in the Final Environmental Impact Report.

17. EIA PROCESS

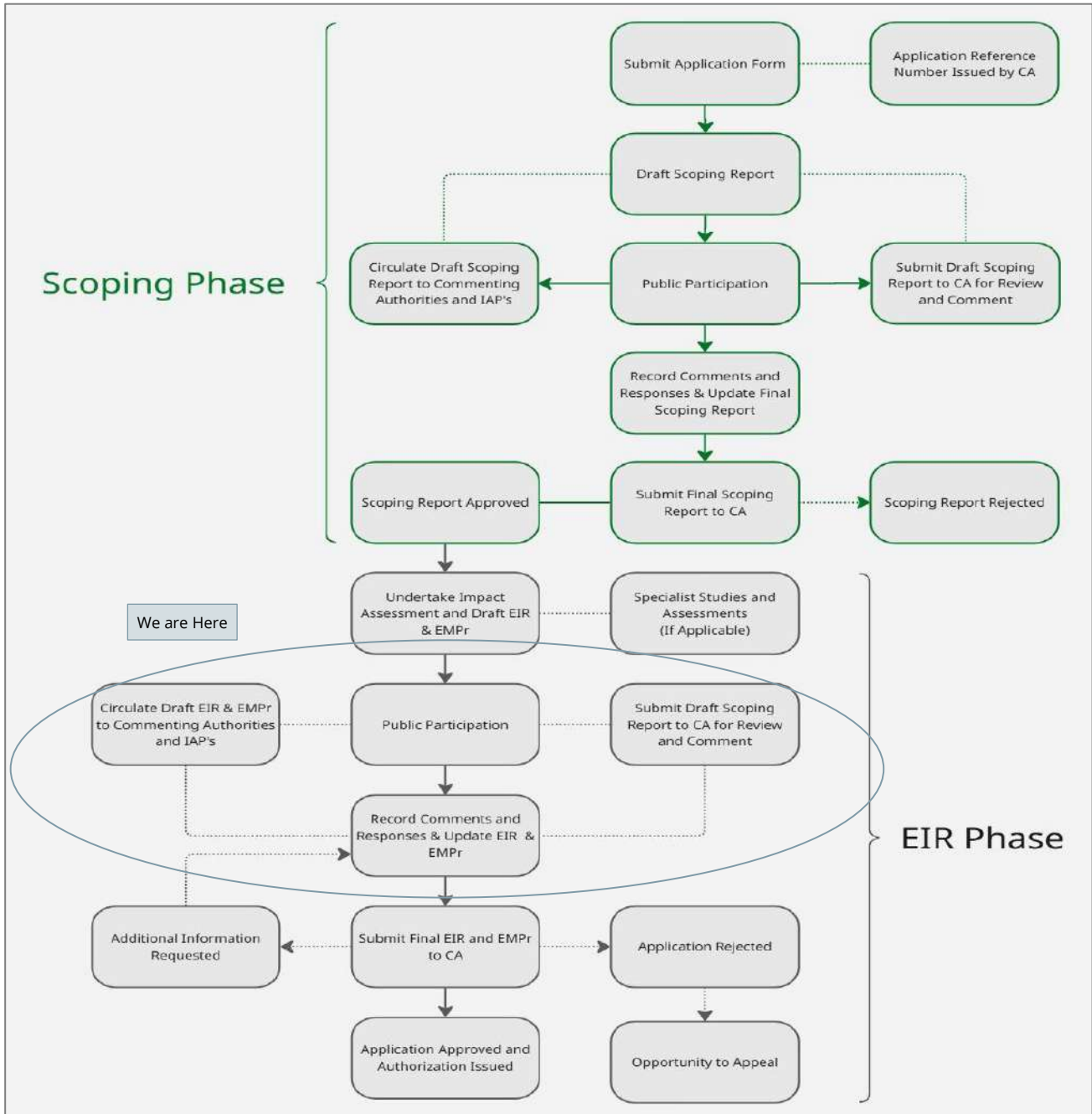
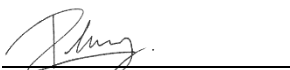


Figure 17: Full Scoping EIA Process Flow

18. 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.

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

Riette Landsberg
Environmental Assessment Practitioner
EAPASA Registration Number 2025/20547

19. CONCLUSION AND RECOMMENDATIONS

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

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

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

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



Annexure A: EAP Qualifications and CV



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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 March 2025

Expires: 31 March 2026

Chairperson

Registrar





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NOORDWES-UNIVERSITEIT

HONOURS BACHELOR OF SCIENCE

in

ENVIRONMENTAL SCIENCES

awarded to

RIETTE JANICA LANDSBERG

after complying with all the requirements

GESERTIFISEERDE WAARE AFSKRIF
CERTIFIED A TRUE COPY

KOMMISSARIS VAN EDE
COMMISSIONER OF OATHS

CHARLES MARTIN PEARSON
Kommissaris van Ede / Commissioner of Oaths
Praktiseerende Prokureur / Practising Attorney
RSA

F W Beyerstraat / F W Beyers Street
Omgegebou / Building Vanderbijlpark
DE KLERK VERMAAK & VENNOTE

4 March 2014

Dr T Eloff
Vice-Chancellor

Prof M Verhoef
Registrar



University number: 21697418
Serial number: 179697



Shaylen Ramsamy Naidoo

ENVIRONMENTAL ASSESSMENT PRACTITIONER AND GIS SPECIALIST

Environmental scientist, GIS specialist, and climate data analyst with 5+ years of experience delivering technically rigorous environmental assessments, geospatial analysis, and data-driven reporting across the mining, energy, industrial, water resource, and climate sectors in South Africa. Registered with SACNASP (Candidate Natural Scientist: 130920) and EAPASA (Candidate EAP: 2024/8707). Strong technical background in ArcGIS Pro, Python scripting, statistical analysis, air dispersion modelling, LiDAR data processing, and water-use GIS — all directly applicable to climate data analysis, value-added climate service delivery, and environmental informatics.

Education & Memberships

- EAPASA Candidate Registered - 2024/8707
- SACNASP Candidate - 130920
- BSc, Hons in Environmental Technology – University of Pretoria, 2019
- BSc, Environmental Science – University of Pretoria, 2018

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
- Air Quality Management and Reporting
- Geographic Information Science (GIS)
- Artificial Intelligence (AI)
- Waste classifications and Management

Notable Experience

- Undertaking and successfully completing basic to complex Full Scoping EIA, Basic Assessment and Atmospheric Impact Reports 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.
- Liaison between clients, industry and relevant authorities whilst focusing on regulatory requirement, need and compliance.

Employment History

LEXECO - Environmental Assessment Practitioner & GIS Specialist | 2026 – PRESENT

Drafting environmental impact assessments (EIAs), Environmental Management Programs, Environmental Monitoring and Investigations, Environmental Compliance Auditing and Compliance Functions. Environmental Permitting

ESCIENCE ASSOCIATES - ENVIRONMENTAL CONSULTANT | 2023 - 2026

Environmental permitting, including EIAs, Basic Assessments, AQMPs, AQIAs, AELs, and WML applications, as well as advanced GIS analysis, air quality modelling, and ESG data management.

Employment History (Continued)

WOOLPERT AFRICA – GIS TECHNICIAN | 2021 – 2023

Managed project workstreams, delivery schedules, and quality assurance milestones for large-scale international geospatial programs. Processed and analyzed LiDAR point-cloud datasets to produce validated Digital Elevation Models (DEMs), while conducting QA/QC, hydro-flattening, and terrain corrections using ArcGIS, Global Mapper, and LP360. Contributed to workflow optimization, standard operating procedure development, technical training, and the resolution of complex spatial analysis challenges to ensure accurate, high-quality, and timely project delivery.

COUNCIL FOR SCIENTIFIC AND INDUSTRIAL RESEARCH (CSIR) – WATER RESOURCE SPECIALIST | 2021 - 2021

Managed Water Use Verification and Validation project tasks — coordinating data collection schedules, maintaining GIS output timelines, and ensuring verified data was captured and submitted to the WARMS database within regulatory requirements. Produced GIS mapping outputs, analyzed water body characteristics, and prepared technical reports and spatial data products for DWAF regulatory compliance, maintaining data integrity throughout.

NATIONAL DEPARTMENT OF ENVIRONMENT, FORESTRY & FISHERIES (DFFE) – ENVIRONMENTAL OFFICER | 2019 - 2020

Managed a personal portfolio of waste management license reviews, environmental standards assessments, and tyre abatement plan evaluations — coordinating documentation, maintaining progress tracking, and escalating critical findings to senior officers within established reporting cycles. Led the public participation process for the national phasing-out of plastic straws under South Africa's national single-use plastic reduction initiative coordinating stakeholder communication, facilitating engagement sessions with industry, municipalities, and civil society groups, and compiling consolidated public inputs into formal regulatory reporting for the Department. Conducted site inspections, environmental audits, and investigations supporting enforcement actions and public health protection across the waste management sector preparing investigation reports and compliance recommendations. Developed IWMP support documentation, waste tariff models, and municipal performance reports improving regulatory implementation clarity and enabling measurable compliance tracking across local government.

MVLOGIC IT SOLUTIONS – COMPUTER TECHNICIAN SUPPORT | 2018 - 2019

Installed, maintained, and troubleshoot computer systems and networks, ensuring operational continuity for business clients; maintained data records with 99% accuracy and documented IT processes to support system stability

**Environmental Assessment
Practitioners Association
of South Africa**



Registration No. 2024/8707

Herewith certifies that
SHAYLEN RAMSAMY NAIDOO
is registered as an
Candidate 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





herewith certifies that
Shaylen Ramsamy Naidoo
Registration Number: 130920
is a registered scientist

in terms of section 20(3) of the Natural Scientific Professions Act, 2003
(Act 27 of 2003)
in the following field(s) of practice (Schedule 1 of the Act)
Environmental Science (Candidate Natural Scientist)

Effective **9 September 2020**

Expires **31 March 2027**



President of Council

Chief Executive Officer



14016852



University of Pretoria

The Council and Senate hereby declare that
at a congregation of the University the degree

Bachelor of Science in Environmental Sciences

with all the associated rights and privileges was conferred on

Shaylen Ramsamy Naidoo

in terms of the Higher Education Act, 1997 and the
Statute of the University

On behalf of the Council and Senate

T. Kupe

Vice-Chancellor and Principal

A handwritten signature in black ink, appearing to be the name of the Registrar.

Registrar



00063396



00233650-01-RJKW

2019-04-11



University of Pretoria

The Council and Senate hereby declare that
at a congregation of the University the degree

Bachelor of Science Honours Applied Science Environmental Technology

with all the associated rights and privileges was conferred on

Shaylen Ramsamy Naidoo

in terms of the Higher Education Act, 1997 and the
Statute of the University

On behalf of the Council and Senate

T. Kupe

Vice-Chancellor and Principal

A handwritten signature in black ink, appearing to be 'S. M. M. M.', written over a circular embossed seal.

Registrar



00081372





University of Pretoria

Faculty of Law

Department of Law General

This is to certify that

SR Naidoo

has successfully completed the

**Short Course in
Environmental Law**

16 to 20 March 2020

This certificate is awarded with distinction

SACNASP Validation Number: 2020-0115-001282 (5 CPD Points)

Course Leader

Executive Manager: Training Solutions
Enterprises University of Pretoria



Annexure B: Site Maps

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



Legend

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

Corners:

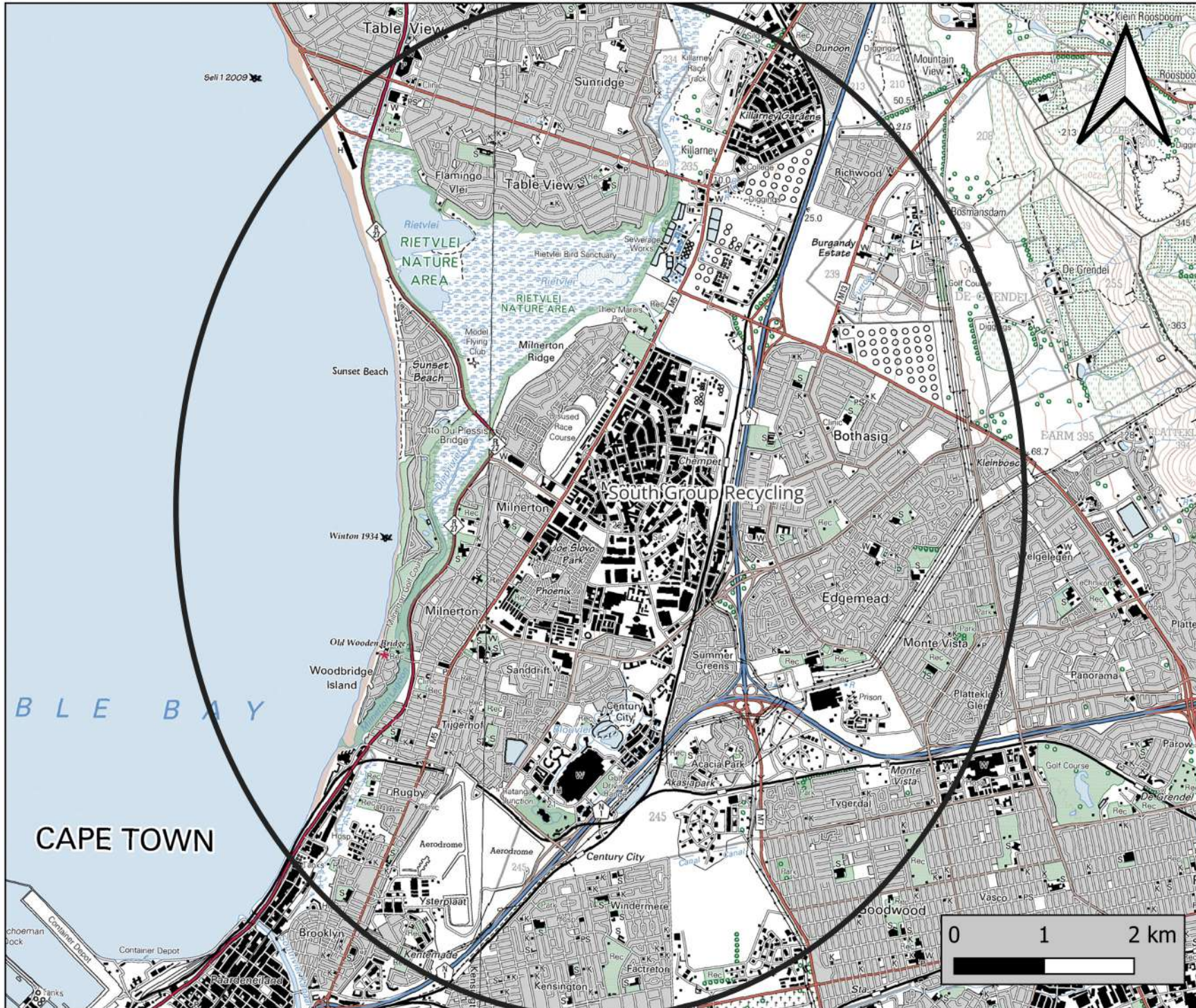
- A= 33°51'58"S; 18°30'48"E
- B= 33°52'00"S; 18°30'49"E
- C= 33°52'00"S; 18°30'48"E
- D= 33°51'59"S; 18°30'48"E



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



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



Legend

- ▲ South Group Recycling
- 5 Km Buffer



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



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



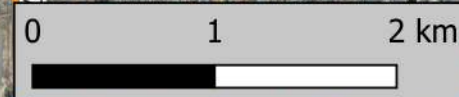
Legend

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

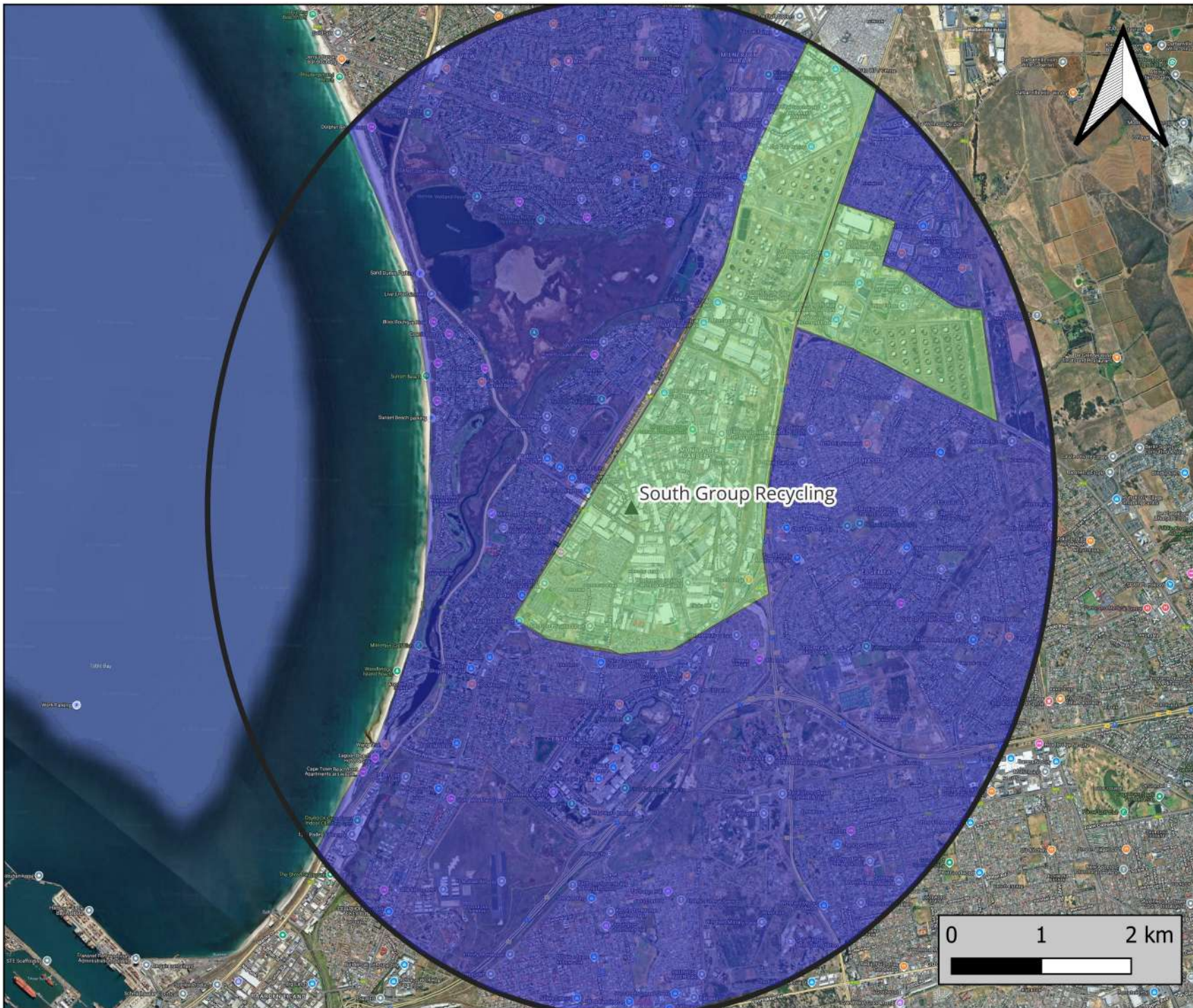


Client: South Group Recycling
Author: CJD Tolken
CRS: WGS 84

LEXeco



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



Legend

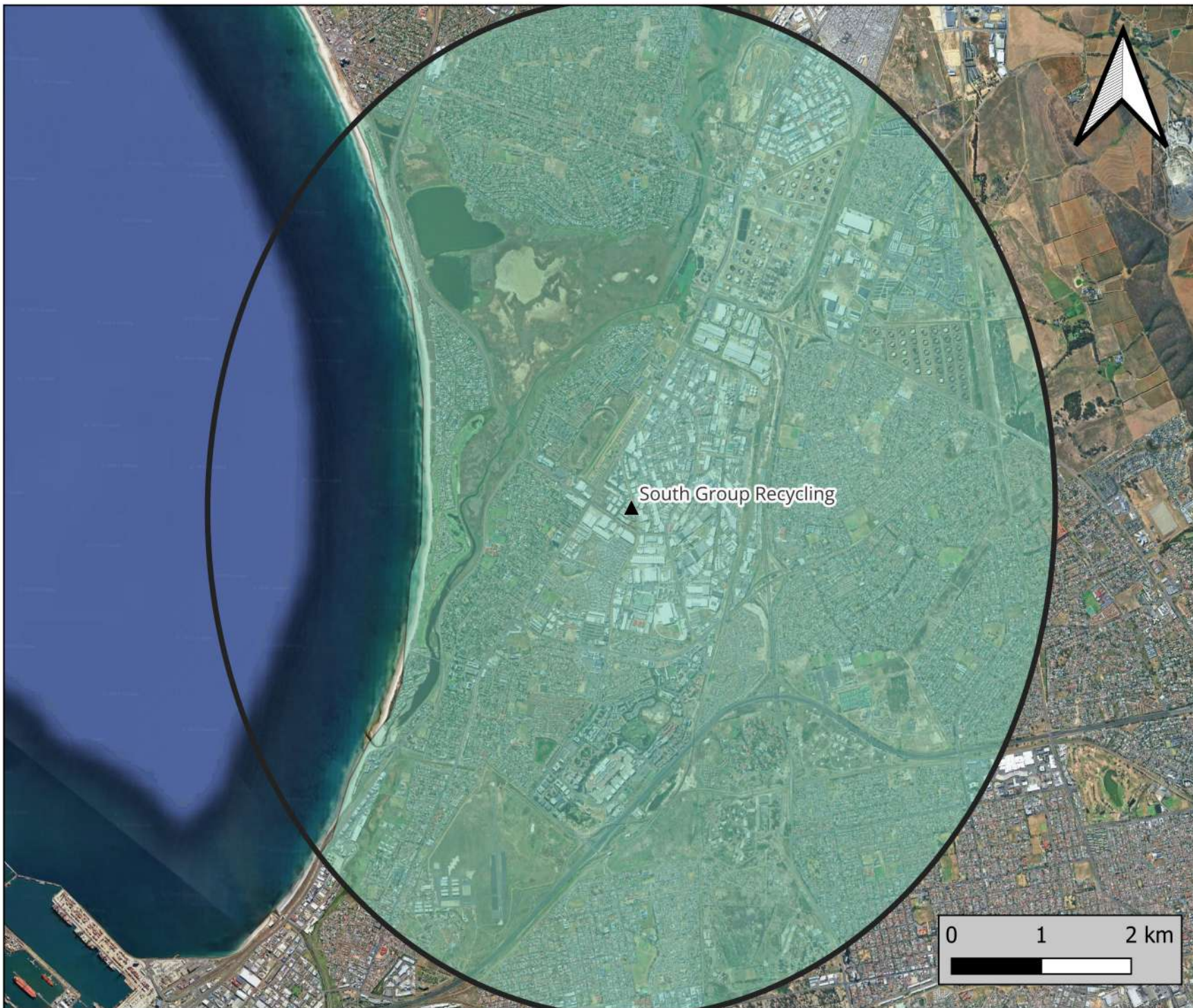
- ▲ South Group Recycling
- ◻ 5 Km Buffer
- Land Use
 - Industrial
 - Residential



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



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



Legend

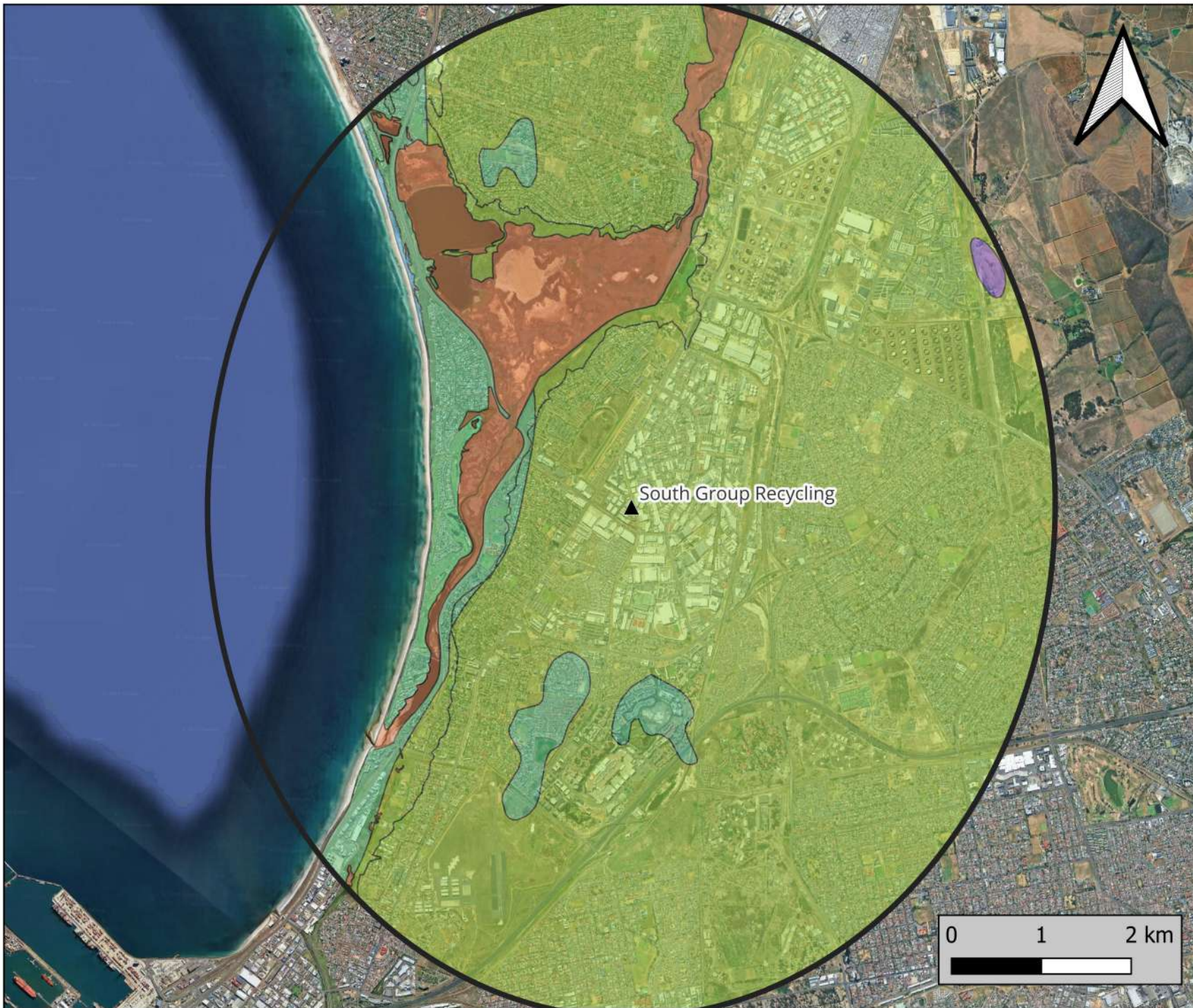
- ▲ South Group Recycling
- ▭ 5 Km Buffer
- Geology
- ▭ Siliciclastic rocks



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

LEXeco

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



Legend

▲ South Group Recycling

◻ 5 Km Buffer

Vegetation

◻ Cape Flats Dune Strandveld

◻ Cape Flats Sand Fynbos

◻ Cape Seashore Vegetation

◻ Non-terrestrial
(estuarine habitat)

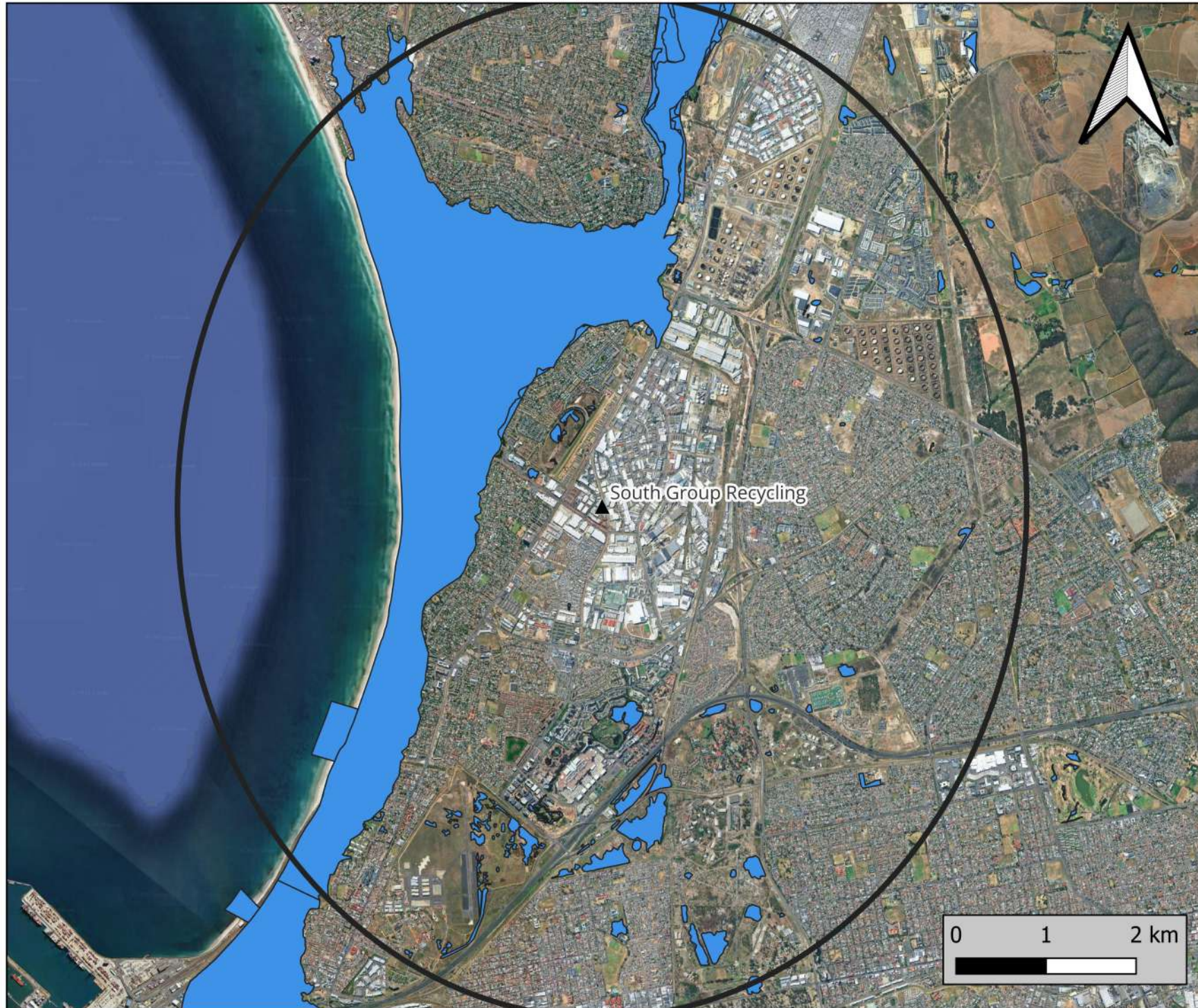
◻ Swartland Shale
Renosterveld



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



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



Legend

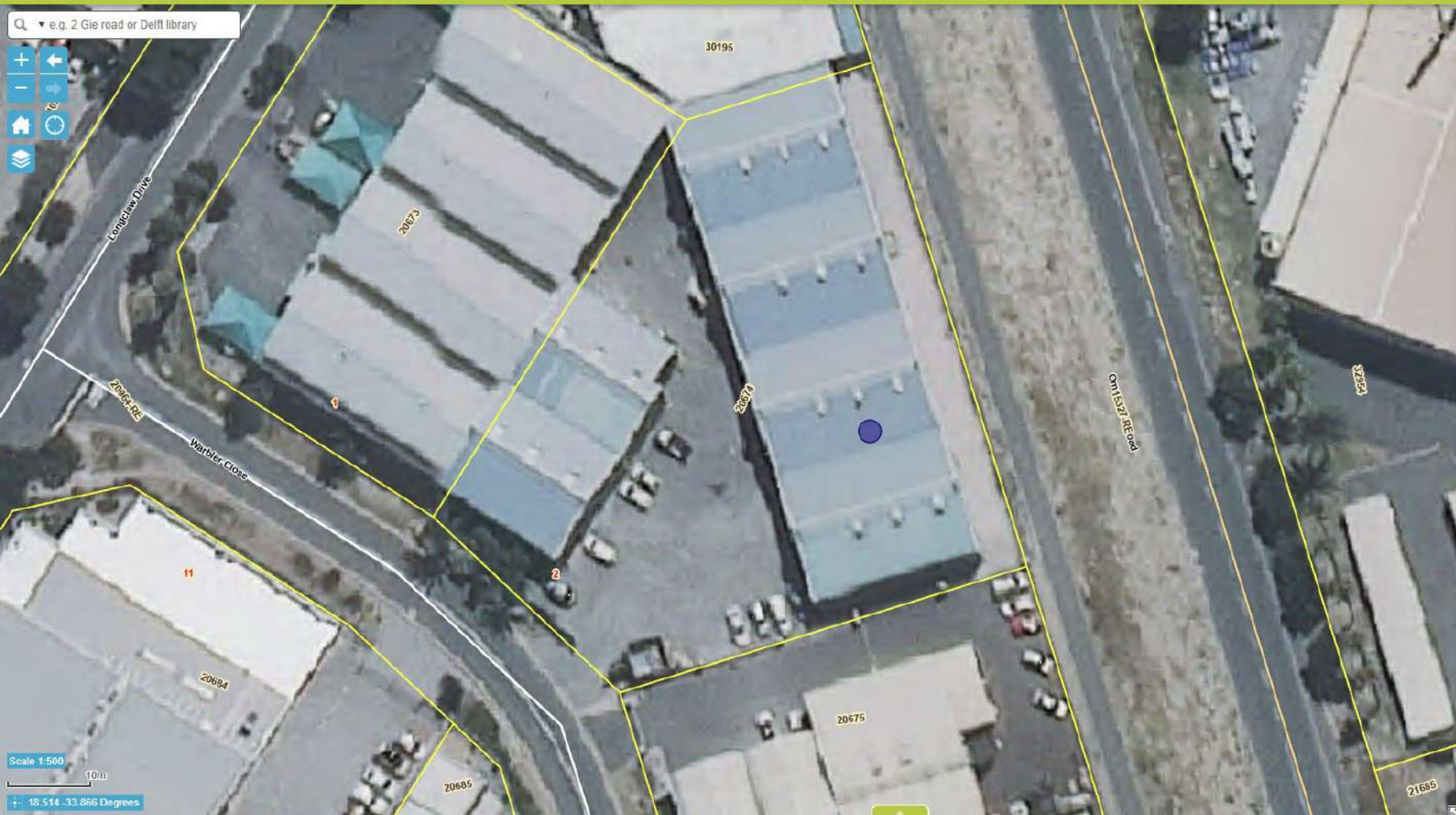
- ▲ South Group Recycling
- ◻ 5 Km Buffer
- Wetlands



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



🔍 e.g. 2 Gie road or Delft library



Scale 1:500
10m
+ 18.514 -33.866 Degrees

Identify Results

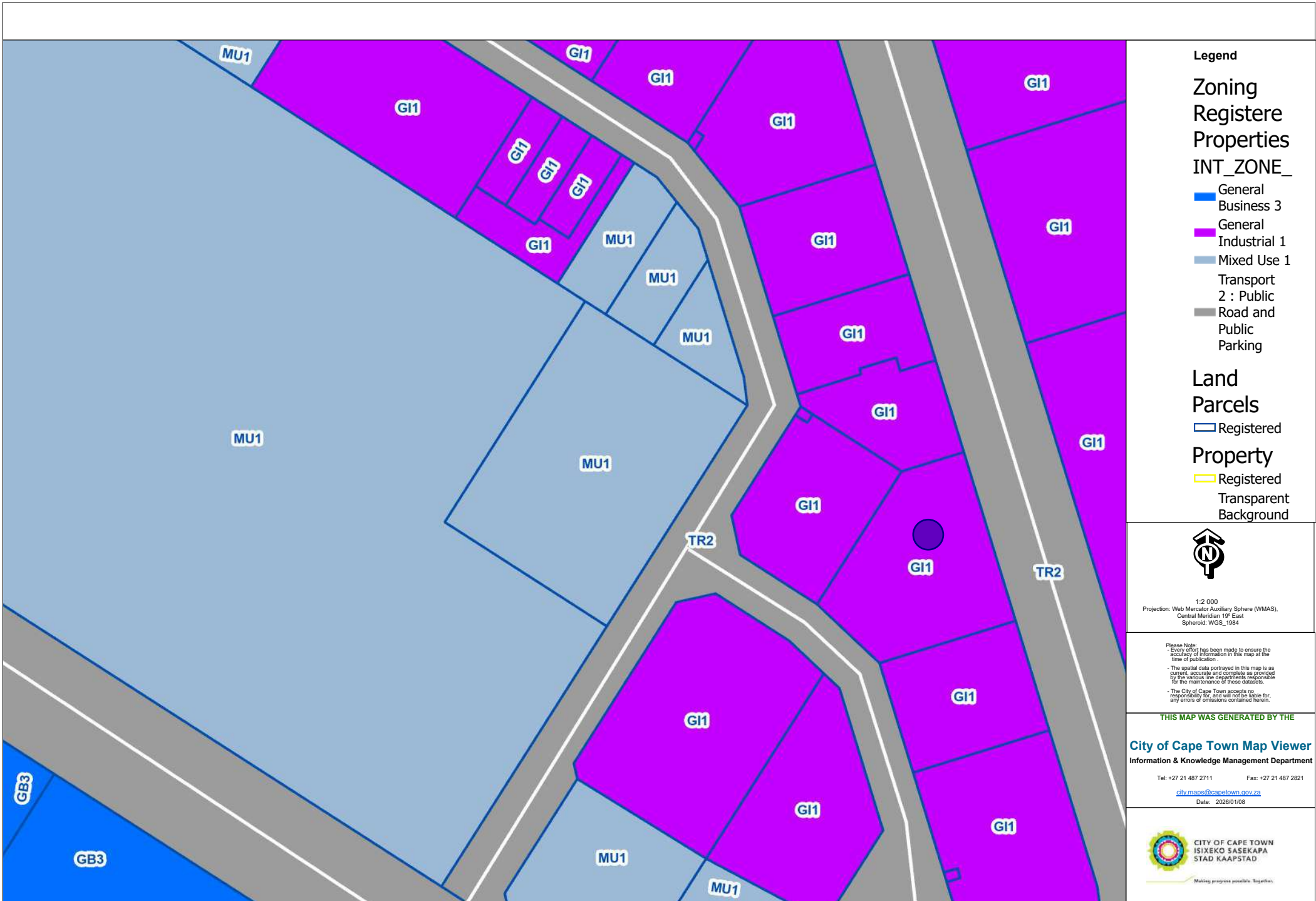
Clear Spatial Links

Property - Registered

Zoom Report

Property Number	20674
Allotment Name	MILNERTON
ISIS Key	253005
Legal Status SG	Registered
Zoning Description	General Industrial 1
Vested Type	No Vesting
Addr No	2
Address No Suffix	
Street Name	WARBLER
Street Name Type	Close
Official Suburb Name	MARCONI BEAM
Subcouncil Name	Subcouncil 3
Ward Name	4
SG26 Code	C0160034000206740000000000
Status	Official
SHAPE.STArea()	3057,264535

- Elevation_Height_Map_1m +
- Elevation_DTM_5m +
- Elevation_DTM_2m +
- Elevation_CCT_GLM2019_5m_DEM +
- Elevation_DTM_10m +



Legend

Zoning Register Properties
INT_ZONE_

- General Business 3
- General Industrial 1
- Mixed Use 1
- Transport 2 : Public
- Road and Public Parking

Land Parcels

- Registered

Property

- Registered
- Transparent Background



1:2 000
Projection: Web Mercator Auxiliary Sphere (WMAS),
Central Meridian 19° East
Spheroid: WGS_1984

Please Note:
- Every effort has been made to ensure the accuracy of information in this map at the time of publication.
- The spatial data portrayed in this map is as current, accurate and complete as provided by the various line departments responsible for the maintenance of these datasets.
- The City of Cape Town accepts no responsibility for, and will not be liable for, any errors or omissions contained herein.

THIS MAP WAS GENERATED BY THE

City of Cape Town Map Viewer
Information & Knowledge Management Department

Tel: +27 21 487 2711 Fax: +27 21 487 2821

citymaps@capetown.gov.za

Date: 2026/01/08



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

Making progress possible. Together!



Annexure C: Public Participation

To be included in Final EIR



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

From: ["Bongani Mashika"](#)

To: ["Riette Landsberg" <Riette@lexeco.co.za>](#)

Date: 1/19/2026 10:24:10 AM

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

Dear Riette Landsberg,

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

Regards,

Mr Bongani Mashika

Directorate: Licensing

Department of Forestry, Fisheries and the Environment

Environmental House

473 Steve Biko Road

Arcadia Ext 6

Pretoria

0001

Email: bmashika@dffe.gov.za



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

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

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

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

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

To whom it may concern,

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

To date we have not received acknowledgement.

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

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

Your feedback is appreciated.

Kind regards,

Riette Landsberg

Environmental Consultant



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

LexEco | Registration Number 2020/642/160/07

1/19/2026

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

Sent: Thursday, January 08, 2026 13:51

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

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

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

To whom it may concern,

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

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

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

Kind regards,



Riette Landsberg
Environmental Consultant



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

LexEco | Registration Number 2020/642/160/07



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

8 January 2026

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

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

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

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

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

Kind regards,

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

Riette Landsberg
Environmental Consultant
LexEco Pty (Ltd)

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

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



Annexure E: Copy of Exporter Permit



forestry, fisheries & the environment

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

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

Ref No: 49135182

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

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

Phone: +27 78 631 1319
Email: jhb@south-group.co.za

Dear Mr. Donatas Brazaitis,

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

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

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

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

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

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

Yours faithfully

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



PRECIOUS METALS ACT, 2005

(ACT 37 OF 2005)

Precious Metals Export Approval

Issued in terms of section 12

**APPROVAL IS HEREBY GRANTED FOR EXPORT IN TERMS OF SECTION 12 (1)
OF THE PRECIOUS METALS ACT NO 37 OF 2005**Issued to: **SOUTH GROUP RECYCLING (PTY) LTD**
Client Code: **22192**Identity/registration number: **2021/444660/07**

Entitling the holder to:

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

Conditions of Permit (if any):

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

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

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

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

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

EXPORT PERMIT REPORT

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

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

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

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

Yours faithfully



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

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

Private Bag X192
Pretoria
0001
South Africa

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

Customer Contact Centre:
0861 843 384



Annexure F: National Screening Tool Report

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

EIA Reference number: Not Yet Available

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

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

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

Applicant: South Group Recycling - Cape Town

Compiler: LexEco

Compiler signature:
.....

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



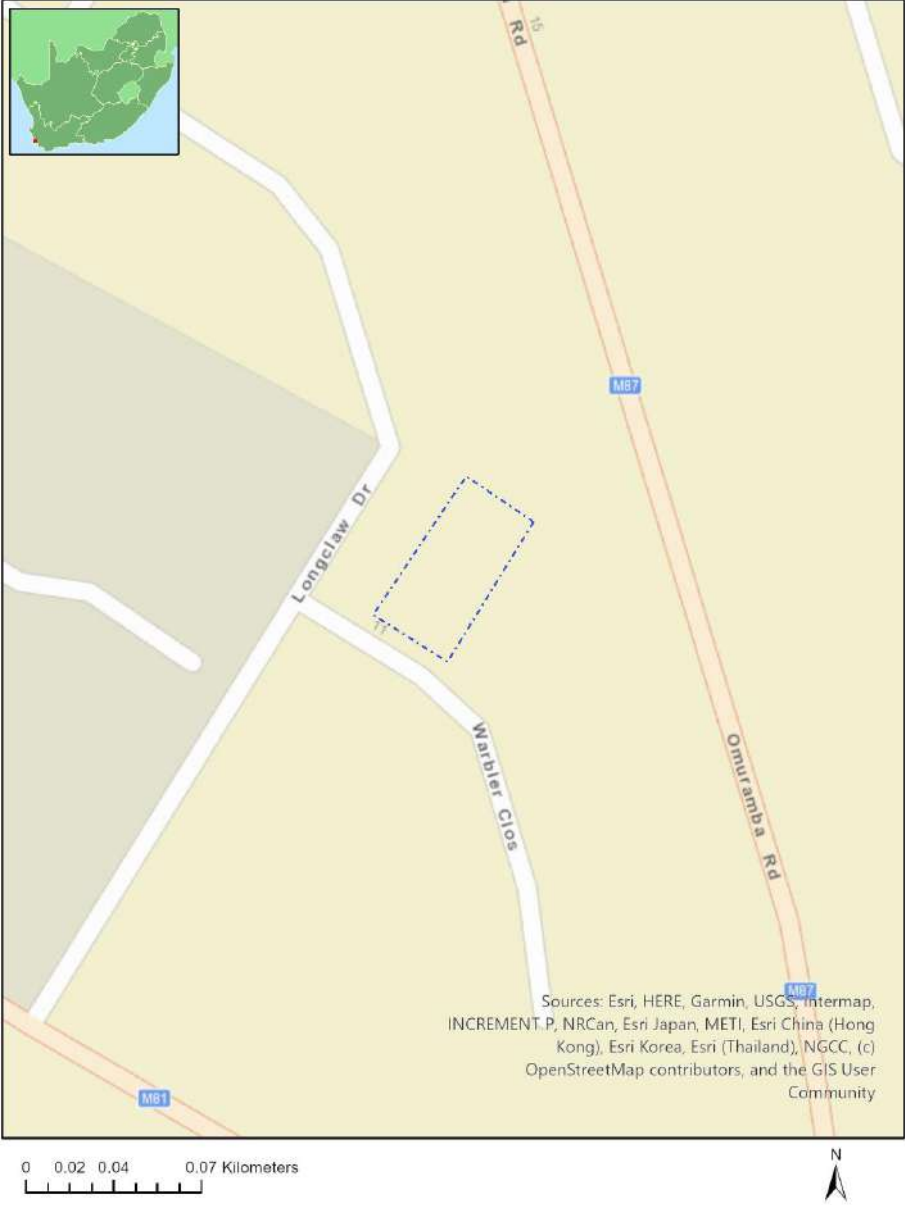
Table of Contents

Proposed Project Location	3
Orientation map 1: General location	3
Map of proposed site and relevant area(s)	4
Cadastral details of the proposed site	4
Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area	4
Environmental Management Frameworks relevant to the application	5
Environmental screening results and assessment outcomes	5
Relevant development incentives, restrictions, exclusions or prohibitions	5
Proposed Development Area Environmental Sensitivity	5
Specialist assessments identified	5
Results of the environmental sensitivity of the proposed area	7
MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY	7
MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY	8
MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY	9
MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY	10
MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY	11
MAP OF RELATIVE DEFENCE THEME SENSITIVITY	12
MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY	13
MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY	14
MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY	15

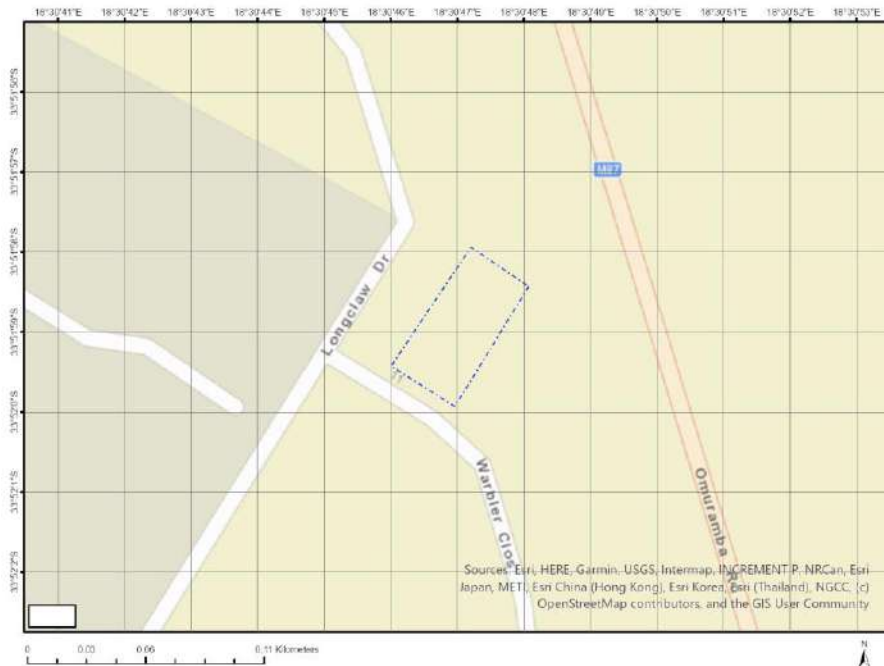
Proposed Project Location

Orientation map 1: General location

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



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

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

Development footprint¹ vertices:

No development footprint(s) specified.

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

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

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

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

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

Services | Waste Management Services | Storage Facilities | Hazardous.

Relevant development incentives, restrictions, exclusions or prohibitions

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

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

Proposed Development Area Environmental Sensitivity

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

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

Specialist assessments identified

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

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

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

Results of the environmental sensitivity of the proposed area.

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

MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	07. Low-Moderate

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY



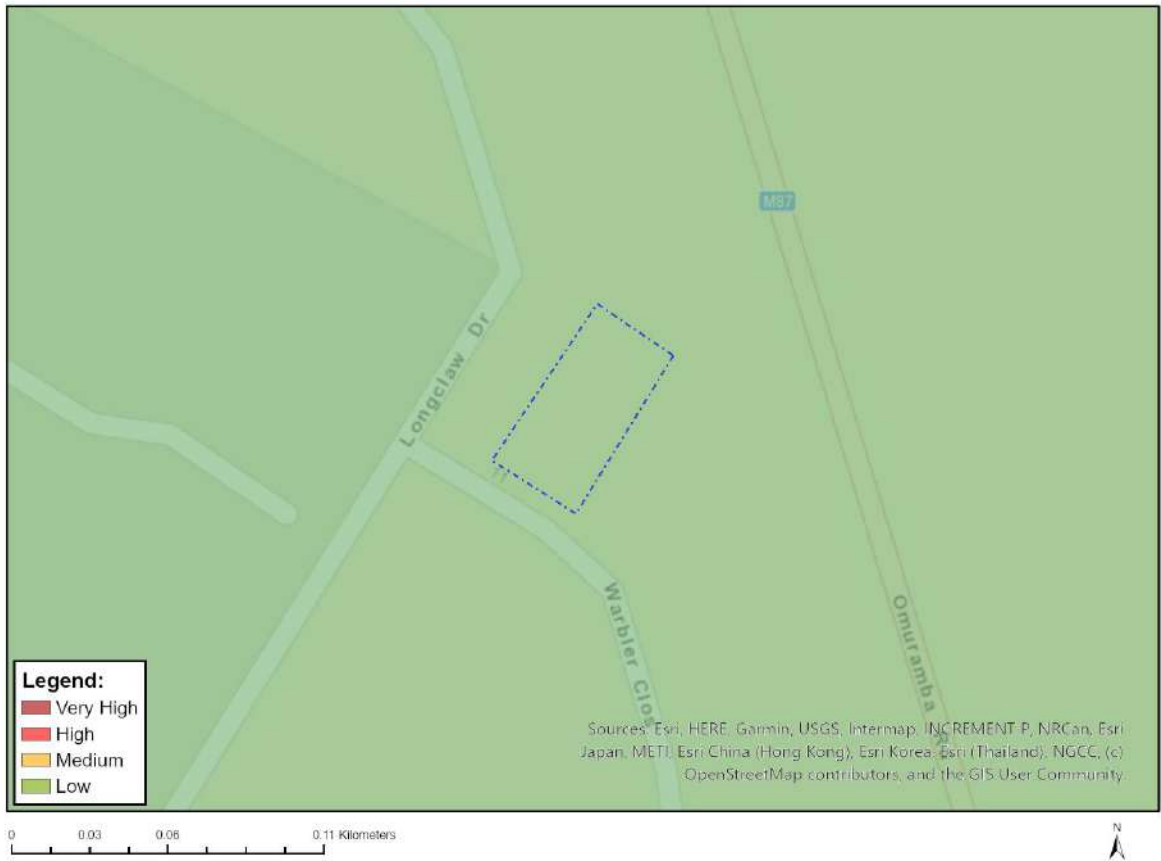
Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their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

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

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

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

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

MAP OF RELATIVE DEFENCE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	Military and Defence Site

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

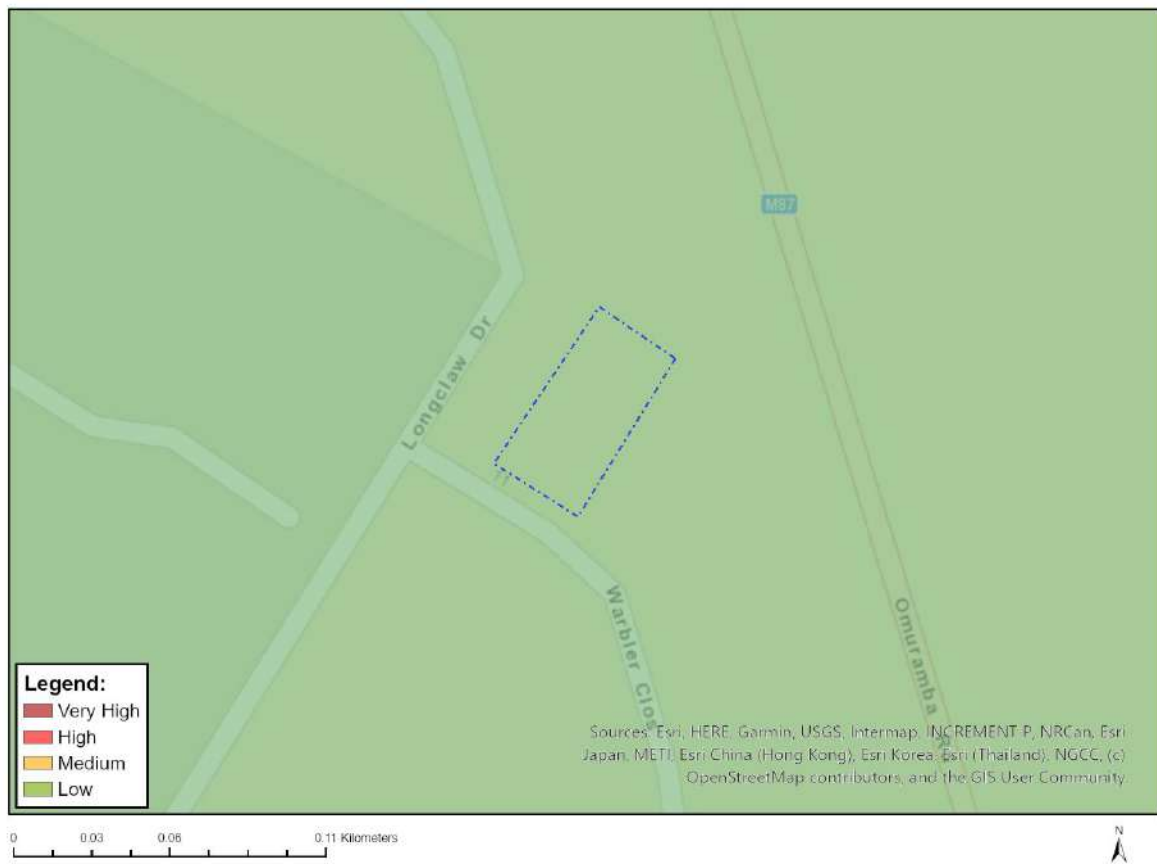


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

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

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



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

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	CR_Cape Flats Sand Fynbos



Annexure G: Site Verification Report



LEGAL INSIGHT. SUSTAINABLE IMPACT.

Site Verification Report

South Group Recycling (Pty) Ltd, Cape Town

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

11 February 2026

Report Nr: SGR-0005-LEX-2026

Where law meets sustainability.
Legal insight. Sustainable impact.

Report Title	Site Verification Report in Support of the WML Application for the Recycling, Recovery and Treatment of Hazardous Waste by South Group Recycling (Pty) Ltd, Cape Town
Report Date	11 February 2026
EAP Details	<p>LexEco (Pty) Ltd</p> <p>11 Alice Lane Building 3, 5th Floor Sandton, Johannesburg 2146</p> <p>Contact Person: Ilke Degenaar Nel EAPASA Reg Nr: 2019/711</p> <p>Tel: 010 023 8543 Email: info@lexeco.co.za</p>
Applicant Details	<p>South Group Recycling, Cape Town</p> <p>Unit 2 Marconi Estate Warbler Cl, Montague Gardens Cape Town, 7442</p> <p>Contact Person: Wayne Clancy</p> <p>Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@south-group.co.za</p>
Application Reference No:	12/9/11/L260310115340/9/N



1. INTRODUCTION AND PROJECT BACKGROUND

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

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

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

1.1. Purpose of this Report

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

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

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

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

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

1.2. Expertise of the EAP Conducting the Site Verification

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

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

2. SITE LOCATION AND DESKTOP ASSESSMENT

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

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

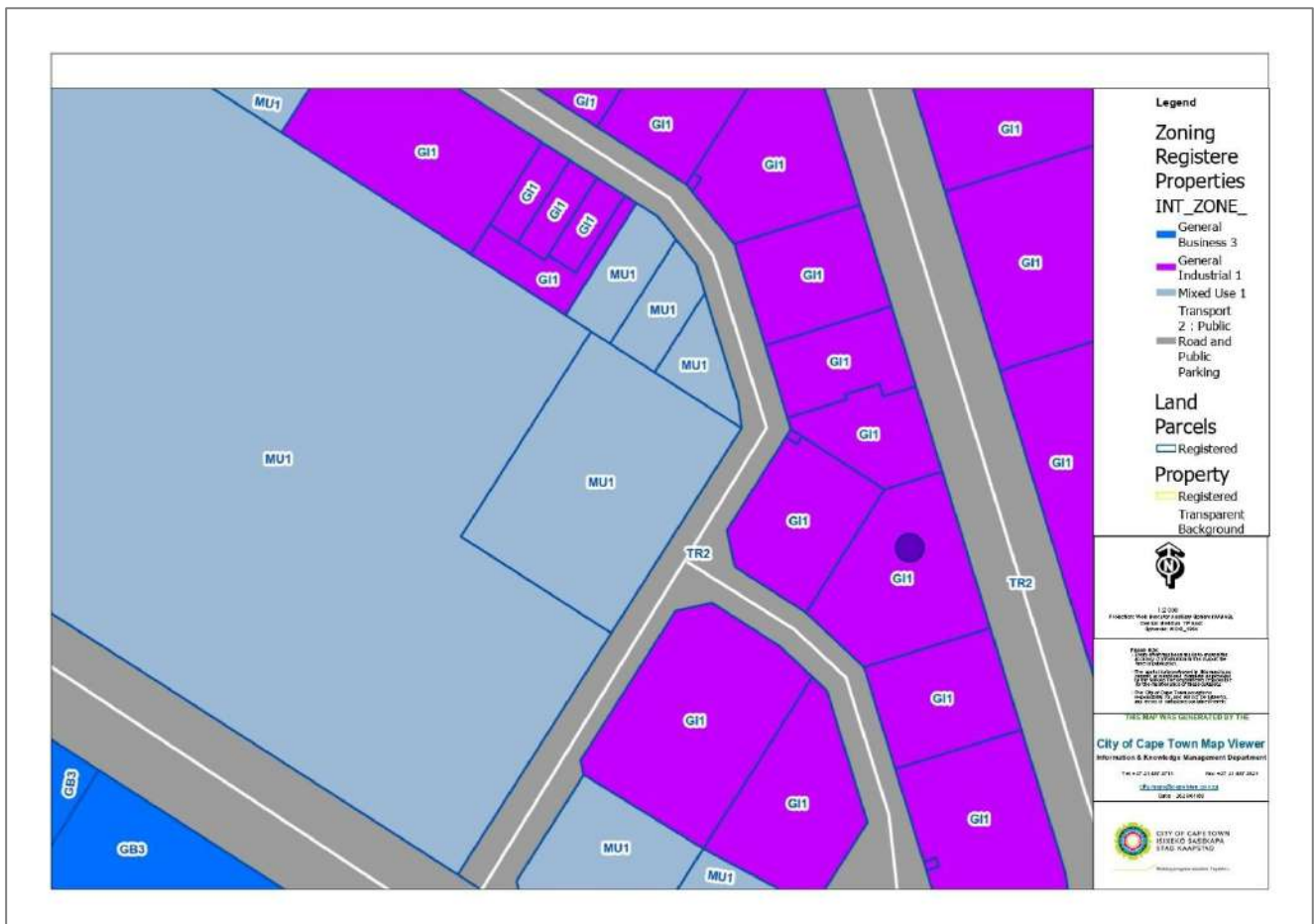


Figure 1: City of Cape Town Municipal Zoning Map

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

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

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



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

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



Photo 1: Street view entrance to the Marconi Industrial Estate



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



Photo 3: Material receiving and sorting area



Photo 4: Product packaging and storage



Photo 5: General view of warehouse and operational areas



Photo 6: General view of warehouse and operational areas



Photo 7: Work stations



Photo 8: General view of warehouse and operational areas

3. SCREENING TOOL IDENTIFIED SENSITIVITIES

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

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

Table 1: National Screening Tool Site Sensitivities

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

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

3.1. Agricultural Theme Sensitivity

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

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

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

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

3.2. Animal Species Sensitivity

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

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

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

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

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

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

3.3. Aquatic Biodiversity Theme

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

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

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

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

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

3.4. Archaeological and Cultural Heritage Theme

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

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

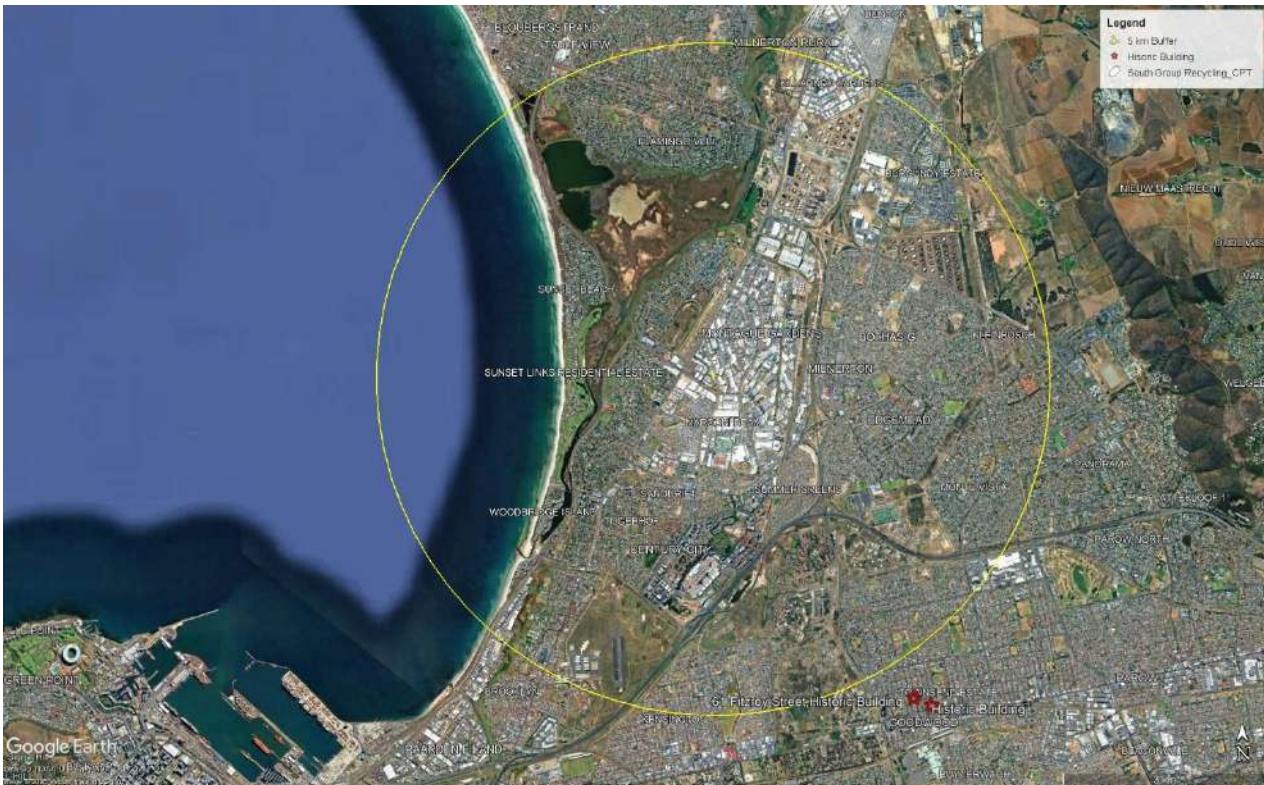


Figure 3: Aerial view of local heritage sites

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

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

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

3.5. Civil Aviation Theme

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

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

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

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

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

3.6. Relative Defence Theme

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

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

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

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

3.7. Palaeontology Theme

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

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

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

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

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

3.8. Plant Species Theme

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

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

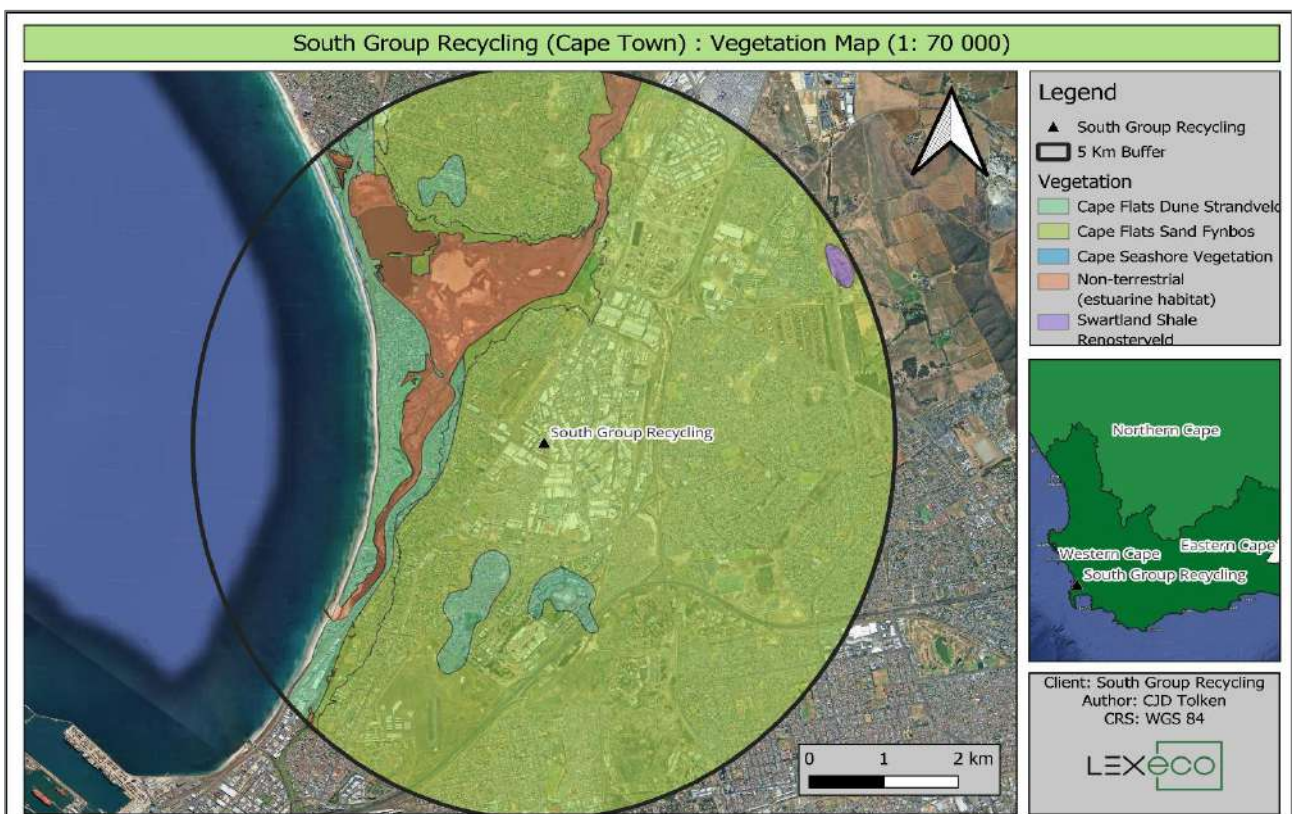


Figure 4: Area Vegetation Map

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

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

3.9. Terrestrial Biodiversity Theme

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

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

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

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

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



4. SITE VERIFICATION OUTCOMES AND CONCLUSION

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

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

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



Annexure H: Site Photos



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



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



Photo 3: Material receiving and sorting area



Photo 4: Product packaging and storage



Photo 5: General view of warehouse and operational areas



Photo 6: General view of warehouse and operational areas



Photo 7: Work stations



Photo 8: General view of warehouse and operational areas



Annexure I: Letter to DFFE

Re: Request for confirmation on the applicability of GN 983 Listed Activity

From Riette Landsberg <Riette@lexeco.co.za>
Date Thu 11 Jun 2026 11:44
To PGwaze@dffe.gov.za <PGwaze@dffe.gov.za>

Dear Dr Gwaze,

This email serves as a follow up with regards to my earlier enquiry.

Your feedback and input is greatly appreciated.

Should you require any additional information, please feel free to contact me 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

LexEco | Registration Number 2020/642/160/07

From: Riette Landsberg <Riette@lexeco.co.za>
Sent: Wednesday, 25 March 2026 16:42
To: PGwaze@dffe.gov.za <PGwaze@dffe.gov.za>
Subject: Request for confirmation on the applicability of GN 983 Listed Activity

Dear Dr Gwaze,

South Group Recycling, Cape Town is in the process of applying for a Waste Management License for the Recycling, Recovery and Treatment of Hazardous Waste (E-waste and Spent Catalytic Convertors).

As part of the Scoping Phase in support to the application, concern was raised with regards to the applicability of Listed Activities published in terms of GN 983.

We therefore kindly request the Department's input on the matter.

Please find attached our enquiry to the Department on the matter.

Should you require additional information or would like to set up a meeting to discuss please feel free to contact me at any time.

Kind regards,



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

25 March 2026

National Air Quality Officer
Patience Gwaza

REQUEST FOR CONFIRMATION OF APPLICABILITY OF LISTED ACTIVITIES IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT AIR QUALITY ACT, 2004 ON BEHALF OF SOUTH GROUP RECYCLING, CAPE TOWN OPERATIONS

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

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

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

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

In order to ensure full legal compliance, South Group Recycling, Cape Town submitted an application for a Waste Management License (WML) to the Department of Forestry, Fisheries and the Environment (DFFE) for the recycling, recovery and treatment of hazardous waste (e-waste and spent catalytic convertors). The application was acknowledged on the 14th March 2026 and application number

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12/9/11/L260310115340/9/N issued. The Full Scoping and EIA process in support of the application is therefore currently underway.

South Group Recycling, Cape Town propose to install additional equipment in order to efficiently process both spent catalytic convertors and e-waste. Equipment to be installed will include horizontal crushers, hammer mills, vacuum filters, cone mixers and scientific ovens.

Proposed Processing of Spent Catalytic Convertors

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

Proposed Processing of E-waste

- Once received, workers manually sort through each load, separating material according to grade.
- Once sorted, workers start to systematically dismantle the units or materials using basic tools such as screw drivers, pliers and wire cutters.
- Recovered materials are again sorted into different categories such as:
 - **Valuable parts:** Printed circuit boards, wires containing copper, and components with precious metals.
 - **Reusable materials:** Plastics, glass, and metals.
- Reusable materials may be subject to additional processing such as crushing and screening, depending on client specifications.
- Circuit boards, wires and or any components containing precious metals will be subject to additional crushing and screening.
 - In some cases, circuit boards will be backed at temperatures not exceeding 90°C over a period of 24 hours using scientific ovens. The process aids in the weakening of bonds between materials making mechanical crushing easier and more efficient.
- Once crushed and screened, final product is collected in bulk bags and sealed for export.

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In light of the above, Subcategory 8.1: *"Thermal Treatment of General and Hazardous Waste"* published in terms of GN 893 of 2013 was consulted and excluded as being applicable due to the following:

"Thermal treatment" as defined in terms of GN 893 means *"incineration, coprocessing and other high temperature treatment of hazardous and general waste"*.

As indicated, South Group Recycling propose to install scientific ovens in addition to alternative equipment to aid in the processing of e-waste. The scientific ovens in question will be used to heat printed circuit boards to temperatures not exceeding 90°C. By exposing the circuit boards to heat for a minimum of 24 hours, adhesive bonds on the circuit boards are broken down, allowing for more effective and efficient crushing and screening of the material.

No incineration or co-processing of waste will be undertaken or is planned. In addition, all operations as applied for will rely on electricity as its energy source. No combustion installations will be needed, nor will any alternative fuels be used.

Based on the proposed scope and process description, the appointed EAP is of the opinion that the proposed waste management activities do not trigger a listed activity under GN 893, with specific reference to Subcategory 8.1: *"Thermal Treatment of General and Hazardous Waste"*.

Since the application process is still underway, the Department of Forestry, Fisheries and the Environment, Air Quality Management Directorate as the Competent Licensing Authority is hereby consulted to confirm the interpretation and applicability of Subcategory 8.1 of GN 893 in relation to the proposed operations.

Should the Department want to discuss the enquiry, a meeting can be scheduled at the earliest date available.

Kind regards,

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

Riette Landsberg

Environmental Assessment Practitioner

EAPASA Nr: 2025/20547

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Annexure J: Scoping Report Approval Letter



forestry, fisheries & the environment

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

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Ref No.: 12/9/11/L260310115340/9/N

Enquiries: Ms. Bongani Mabunda

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LexEco (Pty) Ltd

11 Alice Lane, Building 3

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JOHANNESBURG

2196

Email: riette@lexeco.co.za / info@lexeco.co.za

Attention: Ilke Degenaar Nel

ACCEPTANCE OF THE FINAL SCOPING REPORT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE SOUTH GROUP CAPE TOWN WASTE RECYCLING, REUSE, RECOVERY AND TREATMENT FACILITY LOCATED AT 2 WARBLER CLOSE, MONTAGUE GARDENS, CAPE TOWN, WESTERN CAPE PROVINCE.

The Department confirms receipt of the Final Scoping Report (FSR) for the above-mentioned project received by the Department on 26 March 2026.



Departement van Bosbou, Visserye en die Omgewing • Department of Forestry, Fisheries and the Environment • UmlNyango wezamaHlathi, zokuThiye neBhoduluko • ISebe lezamaHlathi, ezokuLoba noKusingqongileyo • Umlnyango WazamaHlathi, Ezokudoba Nazemvelo • Kgoro ya Dithokgwa, Boreahlapi le Tikologo • Lefapha la Meru, Botshwasi ba ditlhapi le Tikoloho • Lefapha la Dikgwa, Ditlhapi le Tikologo • Lijiko Letemahlatsi, Tinhlantli Netendzawo • Muliasho wa zwa Vhucima-magaka, Vhureakhothe na Mupo • Ndzawulo ya Swihlahla, Vunjoveri na Mbang. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessively for the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act, and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

ACCEPTANCE OF THE FINAL SCOPING REPORT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE SOUTH GROUP CAPE TOWN WASTE RECYCLING, REUSE, RECOVERY AND TREATMENT FACILITY LOCATED AT 2 WARBLER CLOSE, MONTAGUE GARDENS, CAPE TOWN, WESTERN CAPE PROVINCE.

The Department has evaluated the FSR submitted in terms of regulation 21 of Government Notice R 982 of 2014 (as amended) and is satisfied that the document complies with the minimum requirements of Appendix 2 of GN R 982 (as amended). The FSR is hereby accepted by the Department with the following conditions:

1. Potential impacts must be assessed during the EIA phase as indicated on page 5 of the FSR;
2. Page 41 of the FSR indicates that waste generated from the site office will be collected by municipal services for landfill disposal on a regular basis. The Environmental Impact Assessment Report (EIAR) must indicate how often waste will be collected;
3. For all the different alternatives considered, preferred alternatives and a motivation of why they were considered must be indicated. Reasons why other alternatives were not considered must also form part of the EIAR;
4. This is an application for construction/development of a recycling, recovery and treatment facility and not the proposed expansion as indicated on page 115 of the FSR;
5. The Environmental Impact Assessment process must be undertaken in line with Appendix 3 of Government Notice R 982 of the EIA Regulations, 2014 (as amended). Prior to the submission of the final Environmental Impact Assessment Report (EIAR) the draft EIAR must be submitted to the Department for comments;
6. The EIAR must include the draft Environmental Management Programme (EMPr). The draft EMPr to be developed and form part of the EIAR must comply with Appendix 4 of Government Notice R 982 of the EIA Regulations 2014 (as amended); and

ACCEPTANCE OF THE FINAL SCOPING REPORT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE SOUTH GROUP CAPE TOWN WASTE RECYCLING, REUSE, RECOVERY AND TREATMENT FACILITY LOCATED AT 2 WARBLER CLOSE, MONTAGUE GARDENS, CAPE TOWN, WESTERN CAPE PROVINCE.

7. The EMPr must amongst others include an emergency preparedness plan that deals with all potential hazardous circumstances which might occur during all the project life cycle and must include the following:

- Specific emergency centres identified and a list of emergency telephones numbers;
- Identification of all potential emergencies that could arise (e.g. fire and injury); and
- Description of the procedures to be followed in the event of each specific emergency (e.g. evacuation procedures).

You may proceed with the Environmental Impact Assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of the EIA Regulations, 2014 (as amended).

You are hereby reminded that the activity must not commence prior to Waste Management Licence being granted by the Department.

Yours sincerely



Ms Michelle Govender

Chief Director: Hazardous Waste Management and Licensing

Letter signed by: Mr Matjelele Phaladi

Designation: Director: Licensing

Date: 04/05/2026



forestry, fisheries & the environment

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

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

Ref No.: 12/9/11/L260310115340/9/N
Enquiries: Ms. Bongani Mabunda
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11 Alice Lane, Building 3
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2196

Email: riette@lexeco.co.za / info@lexeco.co.za

Attention: Ilke Degenaar Nel

ACKNOWLEDGEMENT OF THE FINAL SCOPING REPORT FOR THE PROPOSED COSTRUCTION AND OPERATION OF THE SOUTH GROUP CAPE TOWN WASTE RECYCLING, REUSE, RECOVERY AND TREATMENT FACILITY LOCATED AT 2 WARBLER CLOSE, MONTAGUE GARDENS, CAPE TOWN, WESTERN CAPE PROVINCE.

The Department confirms receipt of the FSR received on 26 March 2026.

The Report is under review and the decision will be made within 43 days of receipt of the report. Should you require further detailed information, please do not hesitate to contact this office.

You are hereby reminded that the activity must not commence prior to a Waste Management Licence being granted by the Department.

Yours sincerely

Ms. Michelle Govender

Chief Director: Hazardous Waste Management and Licensing

Letter signed by: Ms Bongani Mabunda

Designation: Environmental Officer Specialised Production: Licensing

Date: 30/03/2026



Departement van Bosbou, Visserye en die Omgewing • Department of Forestry, Fisheries and the Environment • UmNyango wezamaHlathi, zokuThiya neBhoduluko • iSebe lezamaHlathi, ezokuLoba noKusingqongileyo • Umnyango WezamaHlathi, Ezokudoba Nezemvelo • Kgoro ya Dithokgwa, Boreahlapi le Tikologo • Lefapha la Meru, Botshwasi ba dithapi le Tikoloho • Lefapha la Dikgwa, Dithapi le Tikologo • Litiko Letemahlatsi, Tinhlanti Netendzawo • Muhasho wa zwa Vhusima-maqaka, Vhureakhovhe na Mupo • Ndzawulo ya Swihlahla, Vunjoveri na Mbango. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessively for the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act, and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.



Annexure K: Impact Assessment Tables

IMPACT ASSESSMENT - CONSTRUCTION PHASE															
ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION	MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION			
Air Quality	Release of greenhouse gas emissions from construction vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Temporary reduction in ambient air quality within the project area	6	7	6	8	152	High	All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	10%	50%	6%	66.88	Low	
		Contribution to regional greenhouse gas emissions and climate change							Minimise vehicle and equipment idling times	10%					
	Burning of waste & open fires on site	Nuisance impacts to nearby receptors due to exhaust emissions, smoke and odours							Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels.	10%					
		Fugetive dust emissions generated from construction activities							Increased dust emissions leading to nuisance conditions to surrounding operations and land owners	Burning of waste or open fires are not permitted on site					10%
										Maintain vehicle inspections to identify the release of black smoke, indictaing the need for maintenance or repairs					5%
		Impliment a fugetive dust emission management plan in order to manage enad minimise fugetive dust emissions throughout the consyruction phase	5%												
Waste Management	Increased waste volumes generated due to construction activities	Littering, visual impacts, odour generation, and attraction of pests and vermin	7	7	6	9	180	High	A site-specific Waste Management Plan to be developed and implemented	5%	40%	6%	97.2	Low	
	Storage of waste on-site	Visual degradation of the site leading to nuisance conditions to surrounding land users and the attraction of vermin							Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers	5%					
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, chemicals) from construction equipment and or vehicle maintenance	Potential contamination of soil, surface water, and groundwater due to leachate generation if improperly handled or stored							Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal	10%					
	Waste removal and transport	Risk of hydrocarbon spills, leaks form transporting vehicles and associated equipment							Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information	5%					
	Waste storage and accumulation due to construction activities	Increased risk of fire							Labelled containers are to be available on site for the source separation and collection of waste prior to being removed from site for recycling, recovery, treatment	10%					
	Poor housekeeping and waste management practices	Potential cross-contamination of recyclable, general, and hazardous waste leading to reduced probability of recycling or recovery, leading to an increased volume of material sent to landfill for disposal							Train employees and operators on approved waste management measures to be implemented, including the correct disposal, separation and handling methods as applicable	5%					
Water and Soil Pollution	Illegal dumping of waste	Soil, surface water and potentially ground water contamination	8	6	7	8	168	High	Construction vehicles, equipment or machinery which is no longer in use must be removed from site	10%	65%	8%	45.36	Insignificant	
	Hydrocarbon spills and leaks								Operations should be confined to the bounds of the warehouse leased by South Group Recycling as far as reasonably possible	10%					
	Oil leaks from construction vehicles, equipment and machinery								No waste generated during the construction phase is to be stored outside the warehouse	10%					
		Storm water contamination							All hydrocarbon spills or vehicle and or equipment leaks must be cleaned up as soon as they occur	10%					
	Hazardous waste coming into contact with storm water leading to leachate generation	Loss of recycleable and re-usable materials							The facility is to develop and implement a spill response procedure	5%					
									All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	10%					
									All opwertaional activities are to be housed under the cover of the warehouse	10%					
									Strict housekeeping measures are to be maintained throughout the construction phase	10%					

IMPACT ASSESSMENT - CONSTRUCTION PHASE																
ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION			
Noise	Construction activities generating higher than normal noise levels	Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss	8	7	5	7	140	Moderate	Construction activities are to be restricted to normal operating hours maintained by South Group Recycling	5%	25%	8%	93.8	Low		
	Use of construction equipment and machinery (jackhammers, grinders, welding machines, etc.)	Nuisance conditions to surrounding landowners and occupants due to high noise levels during the construction phase							in high noise areas must be equipped with appropriate hearing	10%					Employees are to be made aware of noise induced hearing loss and appropriate prevention measures	5%
Traffic	Increased number of vehicles traveling to and from site	Increased traffic congestion	7	6	5	6	108	Moderate	Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable	5%	40%	15%	48.6	Insignificant		
		Damage to property							No parking of trucks or vehicles outside the boundary of the operational site is permitted	10%					All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations.	5%
	Movement of construction vehicles both on and around the site	Degradation of road and traffic infrastructure							No vehicles are to be overloaded	10%					All drivers are to be licensed in accordance with the vehicle and or equipment being driven	10%
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)	Personal injuries	8	8	4	8	160	High	Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained.	10%	35%	8%	91.2	Low		
	Movement of construction vehicles	Noise induced hearing loss							All equipment used on site may only be operated by appropriately trained and / or licensed personnel.	5%						
	Moving equipment	Tripping hazards							PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g., hard hats, safety boots, reflective vests, masks etc.).	10%						
	Stacking of material	Falling objects							Contractors are to submit a safety file to South Group Recycling for approval prior to undertaking any work on site	5%						
	Sharp objects, uneven surfaces and tripping hazards	Exposure to fine dust							Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry	5%						
	Use and handling of heavy machinery and equipment	Pinch points, hot surfaces, fire risks														

IMPACT ASSESSMENT - OPERATIONAL PHASE														
ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION	MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION		
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Deterioration in local air quality, particularly within and immediately surrounding the project site due to the generation of fugitive dust emissions and the release of greenhouse gas emissions	7	7	6	9	180	High	Draft and implement a Fugitive Emissions Management Plan (FEMP) detailing odour and dust nuisance mitigation measures	5%	75%	10%	27	Insignificant
	Burning of waste & open fires								Crushing and milling activities to be equipped with an extraction unit suitable in capturing fugitive emissions.	10%				
	Crushing and screening of catalytic converter substrate to a fine powder	Generation of offensive odours leading to nuisance conditions to surrounding landowners and occupants							Warehouse must be well ventilated and equipped with a suitable ventilation system to allow effective air flow through operational areas	10%				
									Strict housekeeping measures to be maintained throughout operational areas	5%				
	Handling, loading and offloading of waste								All crushing, screening and milling activities are to be housed within the warehouse structure	10%				
	Fumes and emissions generated from e-waste treatment activities	Generation of fugitive dust emissions leading to nuisance conditions impacting surrounding land users and occupants							All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	10%				
									Minimize vehicle and equipment idling times	10%				
	Generation of offensive odours	Smoke emissions from open fires or burning of waste material							Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels	10%				
Burning of waste or open fires are not permitted on site			5%											
Waste Management	Waste handling, transport and processing	Littering, visual impacts, odour generation, and attraction of pests and vermin if not properly managed	7	7	7	8	168	High	A site-specific Waste Management Plan to be developed and implemented	5%	40%	6%	90.72	Low
	Waste generated from operational activities	Visual degradation of the site leading to nuisance conditions to surrounding land users and the attraction of vermin							Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers	5%				
	Storage of waste on-site	Potential contamination of soil, surface water, and groundwater if improperly handled or stored, leading to leachate generation							Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal.	5%				
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, e-waste, chemicals) from operational equipment and or vehicle maintenance	Risk of hydrocarbon spills, leaks & site fires							Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information	5%				
	Waste removal and transport								Labelled containers are to be available on site for the source separation and collection of waste prior to being removed from site for recycling, recovery, treatment	10%				
	Poor housekeeping and waste management practices	Potential cross-contamination of recyclable, general, and hazardous waste if inadequate waste management practices are implemented							Employees and operators to be trained on approved waste management measures to be implemented, including the correct disposal, separation and handling methods as applicable	5%				
Contractors to be provided a copy of the WML as well as EMP prior to commencement of any activity on site			5%											

IMPACT ASSESSMENT - OPERATIONAL PHASE														
ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION	
Water and Soil Pollution	Illegal dumping of waste	Soil, surface water and potentially ground water contamination	7	4	4	10	150	High	Operations should be confined to the boundaries of the warehouse leased by South Group Recycling	10%	55%	6%	58.5	Low
	Hydrocarbon spills	Potential storm water contamination							All waste related activities and associated operations to be located on concreted or impermeable surfaces	10%				
	Oil leaks from vehicles, equipment and machinery	Maintenance of equipment, vehicles or machines posing a risk of hydrocarbon leaks leading to soil or potential surface water or storm water contamination							No waste is to be stored outside the warehouse	5%				
	Hazardous waste coming into contact with storm water leading to leachate generation	Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination							All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur	5%				
	Maintenance of equipment machinery and vehicles								The facility is to develop and implement a spill response procedure	5%				
	Vehicle or machinery malfunction								All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	10%				
Noise	Operational activities generating high noise levels	Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss	7	7	4	9	162	High	Waste recycling, recovery and treatment activities are to be restricted to normal operating hours maintained by South Group Recycling	5%	35%	8%	92.34	Low
	Use of machinery and equipment and machinery (grinders, welding machines, etc.	Nuisance conditions to surrounding landowners and occupants due to high noise levels during the operational phase							All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection.	10%				
									Employees are to be made aware of noise induced hearing loss and appropriate prevention measures	5%				
									An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party	5%				
									Occupational noise surveys to be undertaken in accordance with the Occupational Health and Safety Act and associated regulations	10%				
Traffic	Increased number of vehicles traveling to and from site	Increased traffic congestion	7	5	5	6	102	Moderate	Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable	5%	20%	8%	73.44	Low
	Movement of vehicles both on and around the site	Degradation of road and traffic infrastructure							No parking of trucks or vehicles outside the boundary of the operational site is permitted	5%				
									All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations	5%				
									No vehicles are to be overloaded	5%				

IMPACT ASSESSMENT - OPERATIONAL PHASE														
ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION	
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)	Personal injuries	7	6	4	8	136	Moderate	Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained	10%	45%	8%	63.92	Low
	Movement of vehicles	Noise induced hearing loss							All equipment used on site may only be operated by appropriately trained and / or licensed personnel	5%				
	Moving equipment	Tripping hazards							PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g., hard hats, safety boots, reflective vests, masks etc.)	10%				
	Stacking of material	Falling objects							Contractors are to submit a safety file to South Group Recycling for approval prior to undertaking any work on site	10%				
	Sharp objects, uneven surfaces and tripping hazards								Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry	5%				
	Use and handling of heavy machinery and equipment	Exposure to fine dust							All ablution facilities, kitchen, changing rooms, and general factory/offices areas must be cleaned and maintained daily to ensure a clean and hygienic work environment for all employees.	5%				

IMPACT ASSESSMENT - DECOMMISSIONING PHASE																				
ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION							
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Deterioration in local air quality, particularly within and immediately surrounding the project site due to the generation of fugitive dust emissions and the release of greenhouse gas emissions	5	8	6	6	114	Moderate	The approved fugitive emissions management plan is to be revised and updated to align with planned decommissioning activities	10%	55%	5%	45.6	Insignificant						
	Dust control measures to be implemented during the decommissioning phase								10%											
	Strict housekeeping measures to be maintained throughout decommissioning phase								5%											
	Minimize vehicle and equipment idling times								5%											
	Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels								10%											
	Burning of waste or open fires are not permitted on site								5%											
Burning of waste & open fires	Generation of fugitive dust emissions leading to nuisance conditions to surrounding operations and land owners	6	8	6	6	114	Moderate	Gas cutting and or grinding must be undertaken in well-ventilated areas or in open air	10%											
Release of smoke form grinding activities when decommissioning equipment, machinery or infrastructure								5												
Waste Management	Waste generated from decommissioning activities	Littering, visual impacts on surrounding landowners and occupants	6	6	5	10	170	High	Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers	5%	35%	8%	96.9	Low						
	Dismantling of machines and equipment	Visual degradation of the site leading to nuisance conditions to surrounding							Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal.	10%										
	Generation of building rubble	Risk of hydrocarbon spills, leaks & site fires when decommissioning machine							6	6					5	10	170	High	Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information	5%
	Storage of waste on-site																		Contractors to be provided with a copy of the WML as well as the approved closure plan prior to commencement of any activity on site	5%
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, hydrocarbons) from decommissioning machinery and equipment																		Waste generated during the decommissioning phase is to be separated at source in order to limit cross contamination between general and hazardous waste	10%
Water and Soil Pollution	Illegal dumping of waste	Soil, surface water and potentially ground water contamination	3	6	5	10	140	Moderate	Concrete or impermeable surfaces are to be kept intact as far as reasonably possible before being removed as part of decommissioning operations	10%	55%	5%	56	Low						
	Hydrocarbon spills	Potential storm water contamination							A spill response procedure is to be implemented throughout the decommissioning phase	5%										
	Oil leaks from vehicles, equipment and machinery	Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination							3	6					5	10	140	Moderate	A spill response kit to be kept on site and used for the cleanup of spills as and when they occur	10%
	Hazardous waste coming into contact with storm water leading to leachate generation																		An incident register must be maintained throughout the decommissioning phase	5%
	Vehicle or machinery malfunction																		Vehicles and equipment stored on site for periods exceeding 24 hours are to be equipped with drip trays	10%
																			Use of drip trays a, tarps and absorbent material must be promoted and kept on hand when manually decommissioning or disassembling equipment and or machinery that may contain hydrocarbon fluids or hydraulics	10%
	Vehicles and equipment used for decommissioning activities must be well maintained and serviced in accordance with manufacturer specifications	5%																		

IMPACT ASSESSMENT - DECOMMISSIONING PHASE

ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION	
Noise	Decommissioning activities generating high noise levels	Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss	7	8	5	8	160	High	Decommissioning activities are to be restricted to normal operating hours (06:00 - 18:00)	5%	30%	6%	102.4	Moderate
									All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection.	10%				
	Noise generating activities must be restricted to the warehouse which will act as a screen	10%												
	An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party	5%												
Socio Economic	Loss of employment opportunities due to site closure and decommissioning	Loss of employment opportunities when site closes	8	9	7	8	192	High	Engagement with employees in advance whilst following legal requirements.	5%	5%	5%	172.8	High
	Loss of revenue due to dated technology and loss of production potential.	Loss of financial input to the local community												

IMPACT ASSESSMENT - "NO-GO" ALTERNATIVE

ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION	
Waste	E-waste that could have been recycled or recovered may be disposed of at landfill facilities	Increased demand on limited landfill airspace	8	8	9	10	250	Severe	Continue to segregate and store e-waste generated on-site and send it to appropriately authorised recycling facilities where feasible	10%	25%	4%	177.5	High
	Increased demand on limited landfill airspace	Soil and ground water contamination due to heavy metal leaching from e-waste disposed to land								10%				
	Increased risk of illegal or unlicensed recycling, recovery and treatment operations	Increased risks of soil and water contamination as well as air pollution due to treatment options used								10%				
	Failure to support national waste minimisation, recycling and resource recovery targets	Reduced diversion of waste from landfill Reduced volumes of waste subject to recycling and or recovery								5%				
	Loss of potentially recoverable materials such as metals, plastics and electronic components	Less recycled materials available to manufacturers								5%				
Loss of Natural Resources Soil and Water Impacts	Valuable materials such as copper, aluminium, steel, gold and plastics will not be recovered and reintroduced into the economy	Increased need for extraction and processing of virgin raw materials	8	8	9	8	200	Severe	Investigate partnerships with licensed third-party e-waste recyclers to recover valuable materials from e-waste streams	5%	5%	4%	199.91	High
	Less availability of recycled or recovered metals leading to a higher need and reliance on mined materials and resources for manufacturing purposes	Air quality, loss of virgin land, loss of biodiversity, loss of indigenous species, loss of ecosystems								5%				
Noise	Operational activities generating high noise levels	Nuisance conditions to surrounding landowners and occupants due to high noise levels during the operational phase	7	7	4	9	162	High	Waste recycling, recovery and treatment activities are to be restricted to normal operating hours maintained by South Group Recycling	10%	15%	8%	124.74	Moderate
									An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party	5%				
Traffic	Movement of vehicles both on and around the site	Reduced traffic flow and possible congestion	7	5	5	6	102	Moderate	Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable	5%	25%	6%	70.38	Low
									No parking of trucks or vehicles outside the boundary of the operational site is permitted	5%				
									All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations	5%				
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)	Personal injuries	7	6	4	8	136	Moderate	Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained	10%	30%	6%	87.04	Low
	Movement of vehicles	Noise induced hearing loss								10%				
		Tripping hazards								10%				
	Stacking of material	Falling objects								5%				
	Sharp objects, uneven surfaces and tripping hazards	Exposure to fine dust								5%				
Socio-economic	Potential direct and indirect jobs associated with the expanded facility would not be created	Loss of employment opportunities and skills development opportunities	8	10	9	8	216	Severe	Source services and materials locally where possible to maintain some level of economic contribution	10%	10%	4%	215.86	Severe
	Local businesses and service providers may not benefit from increased economic activity associated with the project	Economic setbacks due to reduced investment and trading potential								10%				

IMPACT ASSESSMENT - ALTERNATIVE LOCATION

ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION	MITIGATION	MITIGATION – ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION		
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Deterioration in local air quality, particularly within and immediately surrounding the project site due to the generation of fugitive dust emissions and the release of greenhouse gas emissions	8	8	7	9	207	Severe	Draft and implement a Fugitive Emissions Management Plan (FEMP) detailing odour and dust nuisance mitigation measures	5%	30%	10%	124.2	Moderate
		Generation of offensive odours leading to nuisance conditions to surrounding landowners and occupants							Strict housekeeping measures to be maintained	5%				
	Vegetation removal and movement of construction equipment and vehicles over unpaved roads and surfaces during construction and or development	Generation of fugitive dust emissions leading to nuisance conditions impacting surrounding land users and occupants							Construction and or development areas are to be demarcated to ensure that operations are maintained to the authorised location	10%				
									Handling, loading and offloading of construction materials during development	Minimize vehicle and equipment idling times				
Waste Management	Less availability of recycled or recovered metals leading to a higher need and reliance on mined materials and resources for manufacturing purposes	Air quality, loss of virgin land, loss of biodiversity, loss of indigenous species, loss of ecosystems	7	8	7	10	220	Severe	Continue to segregate and store e-waste generated on-site and send it to appropriately authorised recycling facilities where feasible	10%	25%	6%	151.8	High
		Prior to the site being established and dually authorised, no waste can be accepted for recycling, recovery and or treatment, resulting in higher volumes of waste being diverted to landfill for disposal								Ensure all e-waste is transported by registered waste transporters to authorised facilities and maintain waste manifests and disposal records				
	Storage of waste on-site	Increased risk of soil, surface water and ground water contamination due to e-waste being illegally disposed of or handled due to lack of authorised processing facilities in the area							Continue participating in Extended Producer Responsibility (EPR) schemes and industry recycling initiatives	5%				
	Failure to support national waste minimisation, recycling and resource recovery targets whilst development is ongoing and authorisations are pending	Reduced diversion of waste from landfill												
	Loss of potentially recoverable materials such as metals, plastics and electronic components whilst development is ongoing and authorisations are pending	Less recycled materials available to manufacturers												
Water and Soil Pollution	Illegal dumping of waste	Soil, surface water and potentially ground water contamination	7	4	4	10	150	High	Operations should be confined to the boundaries of the warehouse leased by South Group Recycling	10%	55%	6%	58.5	Low
	Hydrocarbon spills	Potential storm water contamination							All waste related activities and associated operations to be located on concreted or impermeable surfaces	10%				
	Oil leaks from vehicles, equipment and machinery	Maintenance of equipment, vehicles or machines posing a risk of hydrocarbon leaks leading to soil or potential surface water or storm water contamination							No waste is to be stored outside the warehouse	5%				
	Hazardous waste coming into contact with storm water leading to leachate generation	Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination							All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur	5%				
	Maintenance of equipment machinery and vehicles								The facility is to develop and implement a spill response procedure	5%				
	Vehicle or machinery malfunction								All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	10%				
		All maintenance undertaken outside buildings (i.e. on roads, paving or any exposed area exposed) must be undertaken with drip trays to capture any spills or leaks	10%											

IMPACT ASSESSMENT - ALTERNATIVE LOCATION

ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION	MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION		
Noise	Construction activities generating higher than normal noise levels	Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss	8	7	5	7	140	Moderate	All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection.	10%	0.15	10%	13975%	Moderate
	Use of construction equipment and machinery (jackhammers, grinders, welding machines, etc.)	Nuisance conditions to surrounding landowners and occupants due to high noise levels during the construction phase							Employees are to be made aware of noise induced hearing loss and appropriate prevention measures	5%				
									An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party	5%				
Natural Resources	Site relocation requiring virgin land development	Loss of virgin land, ecosystem disturbance, loss of indigenous habitat, fauna and flora	6	7	7	10	200	Severe	Undertake a thorough site screening assessment aimed at identifying the best suited location for the new site development	10%	15%	10%	199.75	High
	Development and construction of new roads, access routes and supporting infrastructure	Industrialisation of a green fields site							Industrially zoned areas as set out in terms of the Municipal Spatial Development Framework must be prioritised for site selection	5%				
	Establishment of alternative facility	Increased demand for construction materials, energy and water resources												
Socio Economic	Purchase or leasing of an alternative property	Increased capital expenditure associated with property acquisition, site preparation and infrastructure development	8	8	7	10	230	Severe	Communicate the relocation to existing employees and provide relevant support where needed	5%	25%	4%	163.3	High
	New Environmental authorisation / Waste Management License process will have to be conducted prior to the undertaking of any development activities	Delays to project implementation due to application timeframes							Continue with operation at the current location as far as reasonably possible before relocating to the new location to limit economic losses	10%				
	Alternative site located further from transport routes	Increased commuting costs for employees and possible loss of employment due to transport challenges							Development site is to be located close to established road networks and logistics routes to limit the requirement for additional developments	10%				
	Relocation to alternative site	Reduced accessibility to suppliers, customers and service providers												

IMPACT ASSESSMENT - ALTERNATIVE TECHNOLOGIES

ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION – ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION	
Air Quality	Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion	Deterioration in local air quality, particularly within and immediately surrounding the project site due to the generation of fugitive dust emissions and the release of greenhouse gas emissions	7	7	8	10	220	Severe	Draft and implement a Fugitive Emissions Management Plan (FEMP) detailing odour and dust nuisance mitigation measures	5%	55%	6%	85.8	Low
	Burning of waste & open fires	Generation of offensive odours leading to nuisance conditions to surrounding landowners and occupants							All crushing, screening, milling, shredding and granulation activities to be equipped with an extraction unit suitable in capturing fugitive emissions.	10%				
	Crushing and screening of catalytic converter substrate to a fine powder								Warehouse must be well ventilated and equipped with a suitable ventilation system to allow effective air flow through operational areas	10%				
	Handling, loading and offloading of waste	Generation of fugitive dust emissions leading to nuisance conditions impacting surrounding land users and occupants							Strict housekeeping measures to be maintained throughout operational areas	5%				
	Shredding and granulation of e-waste								All crushing, screening, milling, shredding and granulation activities are to be housed within the warehouse structure	10%				
	Fumes and emissions generated from e-waste treatment activities								All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	10%				
	Generation of offensive odours								Burning of waste or open fires are not permitted on site	5%				
Waste Management	Waste handling, transport and processing	Littering, visual impacts, odour generation, and attraction of pests and vermin if not properly managed	7	7	7	8	168	High	A site-specific Waste Management Plan to be developed and implemented	5%	40%	6%	90.72	Low
	Waste generated from operational activities	Visual degradation of the site leading to nuisance conditions to surrounding land users and the attraction of vermin							Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers	5%				
	Storage of waste on-site	Potential contamination of soil, surface water, and groundwater if improperly handled or stored, leading to leachate generation							Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal.	5%				
	Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, e-waste, chemicals) from operational equipment and or vehicle maintenance	Risk of hydrocarbon spills, leaks & site fires							Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information	5%				
	Waste removal and transport	Potential cross-contamination of recyclable, general, and hazardous waste if inadequate waste management practices are implemented							Labelled containers are to be available on site for the source separation and collection of waste prior to being removed from site for recycling, recovery, treatment	10%				
	Poor housekeeping and waste management practices								Employees and operators to be trained on approved waste management measures to be implemented, including the correct disposal, separation and handling methods as applicable	5%				
								Contractors to be provided a copy of the WML as well as EMP prior to commencement of any activity on site	5%					

IMPACT ASSESSMENT - ALTERNATIVE TECHNOLOGIES

ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION – ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION	
Water and Soil Pollution	Illegal dumping of waste	Soil, surface water and potentially ground water contamination	7	8	7	10	220	Severe	Operations should be confined to the boundaries of the warehouse leased by South Group Recycling	10%	65%	5%	66	Low
	Hydrocarbon spills	Potential storm water contamination							All waste related activities and associated operations to be located on concreted or impermeable surfaces	10%				
	Oil leaks from vehicles, equipment and machinery	Maintenance of equipment, vehicles or machines posing a risk of hydrocarbon leaks leading to soil or potential surface water or storm water contamination							No waste is to be stored outside the warehouse	5%				
	Hazardous waste coming into contact with storm water leading to leachate generation	Maintenance of equipment machinery and vehicles							All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur	5%				
	Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination								The facility is to develop and implement a spill response procedure	5%				
	Vehicle or machinery malfunction	Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination							All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	10%				
	Release of "dirty water" or effluent	Release and discharge of "dirty" water or effluent from the wet shredder							All maintenance undertaken outside buildings (i.e. on roads, paving or any exposed area exposed) must be undertaken with drip trays to capture any spills or leaks	10%				
Noise	Operational activities generating high noise levels	Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss	7	8	7	10	220	Severe	Waste recycling, recovery and treatment activities are to be restricted to normal operating hours maintained by South Group Recycling	5%	35%	8%	125.4	Moderate
	Use of machinery and equipment and machinery (grinders, welding machines, granulators, shredders, etc.	Nuisance conditions to surrounding landowners and occupants due to high noise levels during the operational phase							All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection.	10%				
									Employees are to be made aware of noise induced hearing loss and appropriate prevention measures	5%				
									An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party	5%				
									Occupational noise surveys to be undertaken in accordance with the Occupational Health and Safety Act and associated regulations	10%				
Traffic	Increased number of vehicles traveling to and from site	Increased traffic congestion	7	5	5	6	102	Moderate	Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable	5%	20%	8%	73.44	Low
	Movement of vehicles both on and around the site	Degradation of road and traffic infrastructure							No parking of trucks or vehicles outside the boundary of the operational site is permitted	5%				
									All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations	5%				
									No vehicles are to be overloaded	5%				

IMPACT ASSESSMENT - ALTERNATIVE TECHNOLOGIES

ASPECT	ACTIVITY	IDENTIFIED IMPACT	DURATION	PROBABILITY	EXTENT	SEVERITY	SIGNIFICANCE RATING BEFORE MITIGATION		MITIGATION	MITIGATION - ENGINEERING (-10%), ADMINISTRATIVE (-5%)		DEGREE TO WHICH THE IMPACT CAN BE REVERSED	SIGNIFICANCE RATING AFTER MITIGATION	
Health and Safety	Manual sorting and handling of waste (e-waste and spent catalytic convertors)	Personal injuries	7	6	4	8	136	Moderate	Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained	10%	45%	8%	63.92	Low
	Movement of vehicles	Noise induced hearing loss							All equipment used on site may only be operated by appropriately trained and / or licensed personnel	5%				
	Moving equipment	Tripping hazards							PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g. hard hats, safety boots, reflective vests, masks)	10%				
	Stacking of material	Falling objects							Contractors are to submit a safety file to South Group Recycling for approval prior to undertaking any work on site	10%				
	Sharp objects, uneven surfaces and tripping hazards	Exposure to fine dust							Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry	5%				
	Use and handling of heavy machinery and equipment								All ablution facilities, kitchen, changing rooms, and general factory/offices areas must be cleaned and maintained daily to ensure a clean and hygienic work environment for all employees.	5%				
General	Installation and use of a wet shredder and granulators	Increased electricity and fresh water consumption	8	8	8	10	240	Severe	Review and optimise operational layouts where possible	5%	5%	5%	216	Severe
		Modification to existing infrastructure to accommodate the additional equipment requiring substantial financial inputs												
		Restriction of available operational space due to space needed for the required equipment and associated modifications to be made in order to support the successful operation of the equipment							Obtain approval from the land owner before undertaking relevant modifications to existing infrastructure					
		Reduced processing efficiency due to space and logistical constraints												



Annexure L: Draft EMPr



LEGAL INSIGHT. SUSTAINABLE IMPACT.

Environmental Management Programme

South Group Recycling (Pty) Ltd

Unit 2, Marconi Estate, 2 Warbler Cl, Montague
Gardens, Cape Town

12 June 2026

Where law meets sustainability.
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Report Title	Environmental Management Program
Report Date	12 June 2026
EAP Details	<p>LexEco (Pty) Ltd</p> <p>11 Alice Lane Building 3, 5th Floor Sandton, Johannesburg 2146</p> <p>Contact Person: Riette Landsberg EAPASA Reg Nr: 2025/20547</p> <p>Tel: 010 023 8543 Cell : 076 099 1290 Email: riette@lexeco.co.za</p>
Applicant Details	<p>South Group Recycling, Cape Town</p> <p>Unit 3 at 2 Warbler Close Montague Gardens Cape Town, 7442</p> <p>Contact Person: Wayne Clancy</p> <p>Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@south-group.co.za</p>
Application Reference No:	12/9/11/L260310115340/9/N

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
EAPASA	Environmental Assessment Practitioners Association of South Africa
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMPr	Environmental Management Programme Report
EPP	Emergency Response Plan
ESA	Ecological Support Areas
GIS	Geographic Information Systems
GN	Government Notice
GNR	Government Notice Regulations
I&APs	Interested and Affected Parties
IDP	Integrated Development Plan
IEO	Independent Environmental Officer
km	Kilometre
m	metre
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-Government Organisation
PPE	Personal Protective Equipment
PPP	Public Participation Process

PM	Particulate Matter
SAHRA	South African Heritage Resources Agency
SDF	Spatial Development Plan
t/d	Tons per day
t/m	Tons per month
t/m³	Tons per cubic metre
µg/m³	micrograms per cubic meter
VOC	Volatile Organic Compound
WML	Waste Management License
WUL	Water Use License



TABLE OF CONTENTS

1.	INTRODUCTION	9
2.	EAP DETAILS AND EXPERTISE	9
2.1.	Environmental Assessment Practitioners' Experience	10
3.	DESCRIPTION OF OPERATIONS.....	11
3.1.	Location.....	11
3.2.	Property Description	12
3.3.	Description of Operations.....	14
3.3.1.	E-waste	14
3.3.2.	Spent Catalytic Convertors.....	14
4.	OBJECTIVE OF THE EMPr.....	15
4.1.	Identified Environmental Aspects addressed in the EMPr.....	15
5.	OBLIGATIONS AND RESPONSIBILITIES	16
5.1.	Implementation of EMPr	17
5.2.	Responsibilities.....	17
5.1.1.	The Company (South Group Recycling).....	17
5.1	Branch Manager (BM).....	18
5.2	Environmental Control Officer (ECO) / Waste Management Control Officer (WMCO)	18
5.3	SHEQ Manager	19
6	ENVIRONMENTAL MANAGEMENT PROGRAMME.....	19
6.1	Planning Phase	20
6.2	Environmental Management Programme - Construction Phase	22
6.3	Environmental Management Programme - Operational Phase	31
6.4	Environmental Management Programme - Decommissioning and Closure Phase	41
7	DOCUMENT RETENTION AND RECORD KEEPING	47
7.1	Hard copy retention schedule.....	47
7.2	General Requirements.....	47
8	ENVIRONMENTAL AWARENESS AND TRAINING PROGRAM.....	48

8.1	Implementation.....	48
8.2	Content of Environmental Awareness Plan.....	49
9	MONITORING PROGRAMME.....	49
10	EMERGENCY RESPONCE & ENVIRONMENTAL INCIDENTS	50
10.1	Emergency Response Plan.....	50
10.2	MAJOR INCIDENT REPORTING (NEMA S30)	50
11	CONCLUSION.....	51

LIST OF FIGURES

Figure 1:	South Group, Cape Town Zoomed Locality.....	11
Figure 2:	South Group Recycling, Cape Town Location.....	12
Figure 3:	South Group Recycling, Cape Town Property Zoning	13
Figure 4:	South Group Recycling, Cape Town Surrounding Land Use	13

LIST OF TABLES

Table 1:	Author	9
Table 2:	Co-Author	9
Table 3:	Planning Phase Management Measures	20
Table 4:	Construction Phase EMPr.....	22
Table 5:	Operational Phase EMPr	31
Table 6:	Decommissioning Phase EMPr	41
Table 7:	Document Retention Schedule.....	47
Table 8:	Monitoring and Reporting Programme	49

GN R982, APPENDIX 4 CONTENT OF THE ENVIRONMENTAL MANAGEMENT PROGRAMME		REFERENCE IN REPORT
	details of—	
(a)	i) the EAP who prepared the EMPr; and	2
	ii) the expertise of that EAP to prepare an EMPr, including a curriculum vitae;	2.1
(b)	a detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description;	3
(c)	a map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers;	3
(d)	a description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including—	
	i) planning and design;	6.1
	ii) pre-construction activities;	6.1
	iii) construction activities;	6.2
	iv) rehabilitation of the environment after construction and in the case of a closure activity, closure; and	6.4
	v) where relevant, operation activities;	6.3
	a description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) will be achieved, and must, where applicable, include actions to—	
(f)	i) avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;	6.1,6.2,6.3,6.4
	ii) comply with any prescribed environmental management standards or practices; and	6.1,6.2,6.3,6.4
	iii) comply with any applicable provisions of the Act regarding closure, in the case of a closure activity;	6.1,6.2,6.3,6.4
(g)	the method of monitoring the implementation of the impact management actions contemplated in paragraph (f);	6.1,6.2,6.3,6.4

GN R982, APPENDIX 4 CONTENT OF THE ENVIRONMENTAL MANAGEMENT PROGRAMME		REFERENCE IN REPORT
(h)	the frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f);	6.1,6.2,6.3,6.4
(i)	an indication of the persons who will be responsible for the implementation of the impact management actions;	6.1,6.2,6.3,6.4
(j)	the time periods within which the impact management actions contemplated in paragraph (f) must be implemented;	6.1,6.2,6.3,6.4
(k)	the mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f);	6.1,6.2,6.3,6.4
(l)	a program for reporting on compliance, taking into account the requirements as prescribed by the Regulations;	6.1,6.2,6.3,6.4
(m)	an environmental awareness plan describing the manner in which—	8.2
	i) the applicant intends to inform his or her employees of any environmental risk which may result from their work; and	8.2
	ii) risks must be dealt with in order to avoid pollution or the degradation of the environment; and	8.2
(n)	any specific information that may be required by the competent authority.	11

1. INTRODUCTION

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

In recent years the electronic market has boomed, resulting in more electronic waste being generated than ever before. In response the need for responsible and sustainable management of electronic waste has increased. South Group want to capitalise on the opportunity by increasing their current export volumes. In order to undertake the planned recycling, recovery and treatment activities South Group will install relevant equipment such as horizontal crushers, hammer mills, vacuum filters, cone mixers and scientific ovens to assist in optimal processing of approved waste streams. All operations will be located within the existing warehouse located at 2 Warbler Close, Montague Gardens, Cape Town. No extension, alteration or modification to the warehouse and associated infrastructure will be required other than the installation of equipment required to undertake the proposed recycling, recovery and or treatment activities.

2. EAP DETAILS AND EXPERTISE

LexEco (Pty) Ltd was appointed by South Group Recycling as an independent Environmental Assessment Practitioner to facilitate the application for a Waste Management License on behalf of South Group Recycling, Cape Town.

The section below includes details of the appointed EAP and a summary of their expertise.

Table 1: Author

Appointed EAP:	Riette Landsberg
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2.1. Environmental Assessment Practitioners' Experience

➤ *Riette Landsberg (Author)*

Riette Landsberg is an experienced Environmental Consultant and Registered Environmental Assessment Practitioner with over 12 years' experience in environmental management. With an Honours degree in Environmental Sciences from the North West University, Riette is well equipped with a sound knowledge and understanding of the natural environment. Riette has successfully led and completed several applications and projects, including Full Scoping EIA's and Basic Assessments under NEMA and NEMWA and NEMAQA and developed and implemented Environmental Management Programmes. Riette also has extensive experience in the leading of environmental audits, including Water Use Licenses, Air Emissions Licenses, Waste Management Licenses, Environmental Authorisations and Environmental Management Programmes. Years of working in the consulting field have provided Riette with a good understanding of the working environment and how to link comprehensive management measures with the legislative world, ensuring sustainability and economic growth whilst protecting our natural resources and the environment.

Riette holds a valid registration with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (registration number 2025/20547) and is also a registered member of the International Association for Impact Assessment South Africa (IAIASA) (Member number 7822)

➤ *Shaylen Ramsamy Naidoo (Co-Author)*

Shaylen is a registered environmental scientist with the South African Council for Natural Scientific Professionals (Reg Nr: 130920). Shaylen is also registered as a Candidate EAP with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (Reg Nr 2024/8707).

After completing his studies and obtaining an Honours Degree in Environmental Technology and Applied Sciences from the University of Pretoria, Shaylen has worked as an environmental scientist, GIS specialist, and climate data analyst. With a strong technical background in ArcGIS Pro, Python scripting, statistical analysis, air dispersion modelling, LiDAR data processing, and water-use GIS, Shaylen is equipped in delivering technically rigorous environmental assessments, geospatial analysis, and reporting across the mining, energy, industrial, water resource, and climate sectors in South Africa.

Shaylen also has experience in managing and compiling Environmental Impact Assessments (EIAs), Basic Assessments, Waste Management Licence applications, and environmental compliance documentation in accordance with the National Environmental Management Act (NEMA) and related legislation. Shaylen possesses a strong academic foundation supported by practical industry experience in environmental assessment and regulatory processes.

Refer to **Annexure A** of this report for a full copy of the EAP CVs.

3. DESCRIPTION OF OPERATIONS

3.1. Location

The South Group facility in Cape Town is situated within an established warehouse facility that is suitably equipped to accommodate the existing waste storage and transfer operations, as well as the proposed waste recycling, recovery, and treatment activities.

The site is strategically located with convenient access to major local and regional transport routes, including the M87, M5, R27, and the N7 highway. It is positioned approximately 15 km from the Cape Town CBD, 15 km from the Port of Cape Town, and approximately 20 km from Cape Town International Airport. Surrounding suburbs include Milnerton Ridge, Milnerton, Edgemoor, Bothasig, and Summer Greens. The operational area is characterised by a concentration of warehouses, large-format retail outlets, and distribution centres.

South Group, Cape Town currently sources different grades of e-waste and spent catalytic converters from the across South Africa. Once received, the material is subject to manual sorting before being repackaged and exported for further processing and refinery



Figure 1: South Group, Cape Town Zoomed Locality

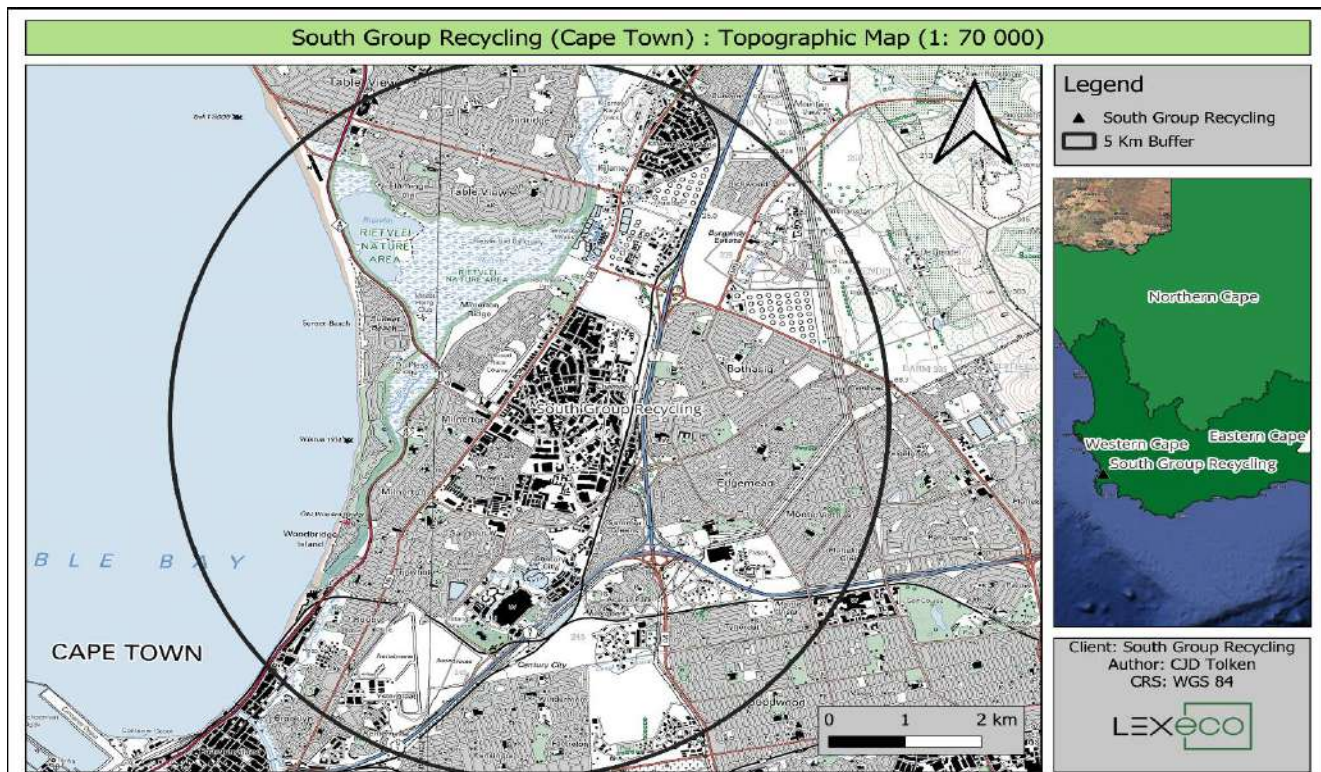


Figure 2: South Group Recycling, Cape Town Location

3.2. Property Description

South Group, Cape town currently operates from within an existing warehouse (Unit 3) in the Marconi Estate, at 2 Warbler Close, Montague Gardens in the Northern suburbs of Cape Town.

The property is situated within a well-established industrial area characterised by warehousing, light industrial and commercial activities. Existing infrastructure at the site includes a fully enclosed warehouse, hard-surfaced access roads, parking areas, stormwater infrastructure, and associated office and storage facilities. Municipal services are already available to the site, with water supplied by the City of Cape Town municipal network and electricity supplied through the existing municipal electrical infrastructure. The property is zoned for industrial use, making it suitable for the proposed waste storage, recycling, recovery and treatment activities. As the proposed operations will be undertaken within an existing developed facility, no major upgrades to the existing infrastructure or municipal services are anticipated.



Figure 3: South Group Recycling, Cape Town Property Zoning



Figure 4: South Group Recycling, Cape Town Surrounding Land Use

3.3. Description of Operations

At current rates more electronic waste is being generated than can be processed. The need for sustainable management thereof has therefore become a growing need. In response, South Group Cape Town are applying for relevant licensing in order to legally process different grades of e-waste and spent catalytic converters providing a sustainable alternative to landfill disposal.

In order to facilitate the proposed recycling, recovery and treatment of approved waste streams, South Group will need to install additional equipment at their Cape Town operations. Once operational, each waste stream will be responsibly processed before producing a range of products suitable for export and further refinery

3.3.1. E-waste

- Once received, workers manually sort through each load, separating material according to grade.
- Once sorted, workers start to systematically dismantle the units or materials using basic tools such as screw drivers, pliers and wire cutters.
- Recovered materials are again sorted into different categories such as:
 - **Valuable parts:** Printed circuit boards, wires containing copper, and components with precious metals.
 - **Reusable materials:** Plastics, glass, and metals.
- Reusable materials may be subject to additional processing such as crushing and screening, depending on client specifications.
- Circuit boards and or any components containing precious metals will be subject to additional crushing and screening.
 - Following initial crushing and screening, circuit boards will be loaded into a scientific oven and backed at low temperatures for a minimum of 24 hours before being allowed to cool before being fed into a manual screen which separates the different components.
- Once crushed and screened, final product is collected in bulk bags and sealed for export.

3.3.2. Spent Catalytic Convertors

- Spent Catalytic Convertors are received in bulk bags which are transported to the South Group, Cape Town facility via truck.
- Once received, workers manually sort through each load and pick out any unwanted or approved materials.
- The outer metal casing of the converter is removed, a process called "*de-caning*"
- The inner ceramic honeycomb substrate, which contains precious metals such as platinum, palladium, and rhodium, is extracted.

- The honeycomb is then crushed into a fine powder using mechanical crushers and grinding mills.
- The outer metal casings are collected in a skip or bulk bags and sold to local recyclers or scrap dealers.
- The fine powder generated from the crushing and milling process is collected in bulk bags, sealed and exported for further refining and processing.

4. OBJECTIVE OF THE EMPR

The objective of the EMPR is to provide South Group Recycling with practical guidance for the environmentally and socially responsible management of the approved waste management activities, i.e., recycling, recovery and treatment of e-waste and spent catalytic converters.

This document provides appropriate mitigation measures designed to prevent or minimise adverse effects on the environment, reduce the risk of natural resource contamination and limit impacts on the surrounding community.

The specific objectives of this EMPR are to:

- Describe actions for implementing and maintaining mitigation measures to address the potential impacts identified in the EIA process.
- Define organisational and administrative arrangements for environmental management and monitoring of the waste management activities as undertaken by South Group Recycling.
- Ensure that site supervisory staff understand the recommended pro-active environmental management measures, so that potential problems can be identified, and mitigation measures implemented, and
- Define actions for environmental control, in the event of unexpected pollution.

4.1. Identified Environmental Aspects addressed in the EMPR

➤ Air Quality

Mitigation and monitoring measures with the objective to achieve adequate control of emission and odour generation associated with on-site activities.

➤ Waste Management

Implementation of effective waste management practices to prevent environmental pollution and unnecessary disposal of waste streams.

➤ Water and Soil Pollution

Measures to prevent the pollution of water and soil resources.

➤ **Natural Resources**

Adequate management measures to minimise the use of natural resources.

➤ **Socio-economics**

Measures to reduce the negative and enhance the positive socio-economic impacts during the construction, operation and decommissioning phases of the conversion project as described.

➤ **Traffic**

Measures to effectively manage and mitigate the impacts of increased traffic pressures in the vicinity to the site and daily operations.

➤ **Noise**

Measures to effectively manage and mitigate the impacts of noise generating activities on site with the aim of reducing potential nuisance conditions.

➤ **Health and Safety**

Measures to reduce the risk for personal injuries and to promote a safe working environment.

5. OBLIGATIONS AND RESPONSIBILITIES

The obligations and responsibilities of South Group Recycling, its contractors and its agents are described in this section.

It remains the responsibility of South Group Recycling to ensure that the activities undertaken at the authorised facility are in accordance with the recommendations of the EMPr and that the EMPr is amended as and when necessary, during the life cycle of the facility.

It is the responsibility of South Group Recycling to ensure that all contractors and agents are made aware and adhere to the stipulations of the approved EMPr.

South Group Recycling undertakes to manage all operations in such a manner as to prevent or minimise adverse effects on the environment, reduce the risk of natural resource contamination and limit impacts on the surrounding community. In addition, South Group Recycling must strive to maximise socio-economic benefits for the area and protect the health and safety of employees, contractors, visitors, and the general public. To this end, South Group Recycling must:

- Ensure that the EMPr forms an integral part of the contract documents entered into with all contractors.

- Educate personnel, contractors, and visitors with regards to general environmental, health and safety requirements applicable to the operations as undertaken by South Group Recycling and the content of the EMPr.
- Provide professional staff to give effect to its environmental management commitments.
- Appoint/designate a competent Environmental Control Officer (ECO) to oversee the implementation of the EMPr.
- The ECO will perform regular inspections to monitor compliance with the EMPr and provide results to the appropriate level of management within South Group Recycling.
- The ECO will provide guidance on the remediation of any unplanned environmental impacts.
- The ECO will also motivate and facilitate any amendments to the EMPr as and when they become necessary.
- Monitor, evaluate and report performance in terms of safety, health and environmental strategies to the relevant management level within South Group Recycling and
- Make employees aware of the environmental risks pertaining to the activities associated with the operations of South Group Recycling and inform them of the mitigation measures contained in the EMPr that are applicable to their scope of work.

5.1. Implementation of EMPr

The EMP should not be seen as an additional requirement separate from the day-to-day activities of the site and associated responsibilities. The EMP must be integrated with routine operations and responsibilities, which requires commitment from management and the workforce alike (DEAT, 2004).

An Environmental Management Programme (EMP) alters the operational focus by placing greater emphasis on environmental responsibility and accountability within day-to-day activities. Employees are therefore required not only to perform their conventional duties, but also to actively identify, minimise, and where possible prevent potential environmental impacts associated with operations (EPA Australia, 1995)

5.2. Responsibilities

5.1.1. The Company (South Group Recycling)

The Company (South Group Recycling) must be familiar with the content of the EMPr and ensure that awareness of certain specifications, standards and procedures, pertaining to the site, are fully understood by the personnel in charge of the site and associated operations.

The Company (South Group Recycling) must also ensure that all the requirements of this EMPr are communicated to the employees / contractors and implemented accordingly.

South Group remains responsible for ensuring that all activities are implemented according to the provisions of the EMPr and conditions of the approved Waste Management License (WML), throughout all phases of the project. Although specific role-players will be appointed by South Group to perform certain functions on its behalf, the ultimate responsibility cannot be delegated. South Group must ensure that sufficient resources (time, financial, human, equipment, etc.) are available to these other parties and or employees to efficiently perform their tasks in accordance to the requirements of the approved EMPr and associated authorisations.

5.1 Branch Manager (BM)

The Branch Manager must ensure that environmental commitments, legal requirements, and mitigation measures are effectively implemented and maintained at an operational level.

- Ensure that all activities undertaken at the facility comply with the requirements of the EMPr, environmental legislation, permit conditions, and licence requirements.
- Promote a culture of environmental responsibility throughout the branch.
- Ensure compliance with relevant authorisations as applicable.
- Appoint an Environmental Control Officer (ECO) to assist with day-to-day EMP implementation and monitoring duties associated with the EMPr and approved authorizations.
- Ensure that the necessary waste licenses, environmental authorization and permits have been obtained and are maintained.
- Review operational procedures in conjunction with the ECO.
- Oversee the implementation of all mitigation and management measures contained within the EMPr.
- Ensure that environmental controls are incorporated into daily operations and maintenance activities.
- Allocate sufficient resources, personnel, and equipment for environmental management.

5.2 Environmental Control Officer (ECO) / Waste Management Control Officer (WMCO)

The Environmental Control Officer (ECO), also referred to as the Waste Management Control Officer (WMCO) is responsible for monitoring, auditing, and reporting on compliance with the Environmental Management Programme (EMPr), environmental authorisations, permit conditions, and applicable environmental legislation. The ECO is responsible in ensuring that environmental commitments are effectively implemented and maintained throughout the project lifecycle.

This role may be fulfilled by any suitably qualified and responsible representative involved with daily on-site operations.

In particular, the ECO shall:

- Monitor compliance with the EMPr, Waste Management Licence (WML) and other applicable permits, licenses and authorisations on an ongoing basis.
- Undertake regular site inspections and compile Environmental Inspection Reports as required,
- Identify environmental non-compliances and risks.
- Keep record of all activities on-site, problems identified and transgressions noted,
- Keep records relating to monitoring, reporting and auditing on-site and make them available for inspection to any relevant Competent Authorities (CA), and
- Continually advise the Company on all environmental issues.
- Facilitate internal auditing and reporting
- Arrange and assist with external auditing and reporting to relevant Competent Authorities (CA's)
- Keep records of all activities/incidents concerning environment performance;
- Keep a register of complaints from IAPs;
- Facilitate ongoing training and awareness of staff with regards to regulatory compliance.
- Liaise with relevant authorities;
- Liaise with contractors regarding environmental management and implementation of the EMPr.

5.3 SHEQ Manager

The SHEQ Compliance Manager must ensure that an Occupational Health and Safety Plan is implemented during operations. The SHEQ Manager must also ensure that the corrective actions, required to keep the facility healthy and safe to all workers, are continuously implemented.

6 ENVIRONMENTAL MANAGEMENT PROGRAMME

The project will follow a life cycle consisting of three phases, namely the construction, operation and eventual closure or decommissioning phase. The different activities associated with the project, identified during the Impact Assessment, as well as the corresponding proposed mitigation measures are discussed in the following sections.

6.1 Planning Phase

Table 3: Planning Phase Management Measures

MITIGATION: ACTION OR CONTROL MEASURE	DURATION	FREQUENCY	RESPONSIBILITY
AUTHORISATIONS			
The EMPr must be seen as a legal and active document. Any changes to the EMPr, which are environmentally defensible, must be submitted to the relevant authorities for approval before such changes are implemented.	Throughout project	When necessary	ECO/ WMCO
A copy of the WML must be kept at the South Group Recycling Cape Town facility. The WML must be made available to any authorised government official who requests copies for inspection or by any employee or agent of the holder of the authorisations who undertake work or are employed by South Group Recycling.	Throughout project	Throughout with monthly inspection by ECO	ECO/ WMCO
No work and or listed waste management activities shall commence until permission is granted by the Competent Authority (CA) in the form of a WML and the EMPr approved.	Prior to commencement	Once-off	ECO/ WMCO
A signed agreement or statement must be obtained from all contractors appointed to undertake work on the approved project site. The acknowledgement must indicate their acknowledgement of the EMPr and willingness to comply with the conditions and requirements of the EMPr and associated environmental authorisations held by South Group Recycling.	Prior to commencement	Throughout	ECO/ WMCO SHEQ Manager
WASTE MANAGEMENT			

MITIGATION: ACTION OR CONTROL MEASURE	DURATION	FREQUENCY	RESPONSIBILITY
Approved waste contractors must be appointed to manage the removal and disposal of solid waste during the construction phase.	Prior to commencement and throughout construction	Throughout	ECO/ WMCO
Ensure that suitable spill kits and absorption materials are purchased prior to commencement with construction and stored suitably in places where there is a high risk of spills.	Throughout Project	Additional absorption materials to be purchased as and when needed	ECO/ WMCO BM
HEALTH AND SAFETY			
A health and safety induction must be prepared and must be undertaken prior to commencing construction.	Prior to commencement and throughout construction	Annually	ECO/ WMCO BM & SHEQ Manager
All contractors must adhere to South Group Recycling's Emergency Preparedness Plan as well as relevant Emergency Procedures and Risk Assessments protocols.	Prior to commencement of construction	Throughout	ECO/ WMCO BM & SHEQ Manager
CONSTRUCTION PHASE PLANNING			
The ECO must ensure all personnel as well as contractors working on the project site are made aware of this EMPr and its content	Prior to commencement	Once-off	ECO/ WMCO BM
The contractor must provide South Group Recycling with a complete safety file for approval prior to undertaking any scope of work.	Prior to commencement	Once-off	ECO/ WMCO SHEQ Manager

6.2 Environmental Management Programme - Construction Phase

Table 4: Construction Phase EMPr

IDENTIFIED IMPACT		OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
1.	ASPECT:	AIR QUALITY						
	Activity:	<ul style="list-style-type: none"> - Release of greenhouse gas emissions from construction vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion - Burning of waste & open fires 						
Temporary reduction in ambient air quality within the project area	Minimise and limit greenhouse gas emissions Prevent or minimise the deterioration of ambient air quality	Compliance with the -	1.1	All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	Service records and logs	ECO/ WMCO SHEQ BM	Throughout the construction phase	
Contribution to regional greenhouse gas emissions and climate change		National Ambient Air Quality Standards (GN 1210) as amended						
Nuisance impacts to nearby receptors due to exhaust emissions and odours		National Dust Control Regulations, GN 7335 of 31 March 2026	1.2	Minimise vehicle and equipment idling times	Site inspections, internal and external audits	ECO/ WMCO SHEQ	Throughout the construction phase	
	City of Cape Town Air Quality Management By-Law (Provincial Gazette No: 7662 dated 17							

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
		August 2016) as amended - Section 4: Duty of care (Reasonable measures to prevent air pollution). - Section 4: Duty of care (Reasonable measures to prevent air pollution). - Section 19: Emissions caused by open burning (Authorisation of open burning and burning of material). - Section 25: Emissions that cause a nuisance (Prohibition of emissions that cause nuisances).	1.3	Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels.	Operators and contractors to undertake regular inspections to identify and repair excessive exhaust emissions	ECO/ WMCO	Throughout the construction phase
			1.4	Burning of waste or open fires are not permitted on site	Site inspections, internal and external audits	ECO/ WMCO SHEQ	Throughout the construction phase
2.	ASPECT:	WASTE MANAGEMENT					
	Activity:	<ul style="list-style-type: none"> - Increased waste volumes generated due to construction activities - Storage of waste on-site - Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, e-waste, chemicals) from construction equipment and or vehicle maintenance - Waste removal and transport - Poor housekeeping and waste management practices 					

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
<p>Littering, visual impacts, odour generation, and attraction of pests and vermin if not properly managed.</p> <p>Visual degradation of the site leading to nuisance conditions to surrounding land users and the attraction of vermin</p> <p>Potential contamination of soil, surface water, and groundwater if improperly handled or stored</p> <p>Risk of hydrocarbon spills, leaks & site fires</p>	<p>Minimize the generation of waste through the implementation of waste avoidance, reduction, reuse, recycling, and recovery principles</p> <p>Prevent littering and illegal dumping within and around the project site</p> <p>Promote responsible waste management practices among employees, contractors, and visitors through training and awareness programs</p>	<p>National Norms and Standards for the Storage of Waste</p> <p>National Environmental Management: Waste Act (Act 59 of 2008) and associated regulations, as amended</p> <p>Municipal bylaws and regulations – City of Cape Town Municipality</p>	2.1	A site-specific Waste Management Plan to be developed and implemented	Keep records of waybills, delivery notes and transporter slips for waste removed	ECO/ WMCO BM	Throughout the construction phase
			2.2	Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers	Keep an up-to-date register of service providers and approved waste management facilities authorized to remove waste from site.	ECO/ WMCO BM	Throughout the construction phase
			2.3	Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal.			

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
Potential cross-contamination of recyclable, general, and hazardous waste if inadequate waste management practices are implemented.	Maintenance of good housekeeping measures		2.4	Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information			
	Ensure the safe handling, storage, transportation, and disposal of waste to prevent pollution and environmental degradation		2.5	Labelled containers are to be available on site for the source separation and collection of waste prior to being removed from site for recycling, recovery, treatment	Site inspections, internal and external audits	ECO/ WMCO SHEQ	
			2.6	Train employees and operators on approved waste management measures to be implemented, including the correct disposal, separation and handling methods as applicable	Training records and registers	ECO/ WMCO SHEQ BM	
3.	ASPECT: WATER AND SOIL POLLUTION Activity: <ul style="list-style-type: none"> - Illegal dumping of waste - Hydrocarbon spills - Oil leaks from construction vehicles, equipment and machinery - Hazardous waste coming into contact with storm water leading to leachate generation 						

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
Soil, surface water and potentially ground water contamination Potential storm water contamination	Prevention of soil and stormwater contamination	Compliance with the National Norms and Standards for the Storage of Waste	3.1	Construction vehicles, equipment or machinery which is no longer in use must be removed from site.	Site inspections, internal and external audits	ECO/ WMCO SHEQ	Throughout the construction phase
			3.2	Operations should be confined to the bounds of the warehouse leased by South Group Recycling as far as reasonably possible.			
			3.3	No waste generated during the construction phase is to be stored outside the warehouse.			
			3.4	All hydrocarbon spills or vehicle and or equipment leaks must be cleaned up as soon as they occur.	Maintain an incident register	ECO/ WMCO SHEQ	Throughout the construction phase
			3.5	The facility is to develop and implement a spill response procedure	Spill kit checklist to form part of the ECO/WMCO site inspections	ECO/ WMCO SHEQ	Throughout the construction phase
			3.6	All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	Service records and logs	ECO/ WMCO SHEQ BM	Throughout the construction phase
4.	ASPECT: NOISE						
	Activity: - Construction activities generating higher than normal noise levels						

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
- Use of construction equipment and machinery (jackhammers, grinders, welding machines, etc.)							
<p>Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss</p> <p>Nuisance conditions to surrounding landowners and occupants due to high noise levels during the construction phase</p>	<p>Limit noise generation at levels likely to result in nuisance conditions to surrounding landowners and occupants</p> <p>Prevent or limit noise induced hearing loss to employees and personnel</p>	Compliance with the National Noise Control Regulations (GNR 154)	4.1	Construction activities are to be restricted to normal operating hours maintained by South Group Recycling	<p>Training records and registers</p> <p>Occupational noise surveys to be undertaken in accordance with the requirements set out in terms of the Occupational Noise Regulations of the OHSA</p>	ECO/WMCO SHEQ Manager BM	Throughout the construction phase
		Compliance with municipal by-laws regulating noise in industrial areas	4.2	All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection.			
		Compliance with the Western Cape Noise Control Regulations	4.3	Employees are to be made aware of noise induced hearing loss and appropriate prevention measures			
		Compliance with the Noise Exposure Regulations published in terms of the Occupational Health and Safety Act (Act No. 85 of 1993)	4.4	An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party			

IDENTIFIED IMPACT		OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
5.	ASPECT:	TRAFFIC						
	Activity:	<ul style="list-style-type: none"> - Increased number of vehicles traveling to and from site - Movement of construction vehicles both on and around the site 						
	Increased traffic congestion Damage to property Degradation of road and traffic infrastructure	To optimally manage traffic flow in and out of the operational site Limit property damage Limit infrastructure degradation	National Traffic Regulations Occupational Health and Safety Regulations	5.1	Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the construction phase
				5.2	No parking of trucks or vehicles outside the boundary of the operational site is permitted	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the construction phase
				5.3	All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations.	Vehicle registrations and road worthy certifications Contractors' safety file to include vehicle and operator licensing as applicable Vehicle inspection checks	ECO/WMCO SHEQ Manager	Throughout the construction phase
5.4				No vehicles are to be overloaded	Records of weighbridge slips, release notes,	ECO/WMCO SHEQ Manager	Throughout the construction phase	

IDENTIFIED IMPACT		OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
						weigh bills are to be maintained		
6.	ASPECT:	HEALTH AND SAFETY						
	Activity:	<ul style="list-style-type: none"> - Manual sorting and handling of waste (e-waste and spent catalytic convertors) - Movement of construction vehicles - Moving equipment - Stacking of material - Sharp objects, uneven surfaces and tripping hazards - Use and handling of heavy machinery and equipment 						
Personal injuries Noise induced hearing loss Tripping hazards Falling objects Exposure to fine dust		Reduced risk of personal injuries Avoid and limit noise induced hearing loss Avoid and limit respiratory impacts on employees and personnel	Compliance with the Noise Exposure Regulations published in terms of the Occupational Health and Safety Act (Act No. 85 of 1993)	6.1	Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained.	Fire extinguisher checks, inspections and maintenance records	External Service Provider SHEQ	Throughout the construction phase
				6.2	All equipment used on site may only be operated by appropriately trained and / or licensed personnel.	License, permits and relevant training registrations and certificates	ECO/WMCO SHEQ Manager	Throughout the construction phase
				6.3	PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g., hard hats, safety boots, reflective vests, masks etc.).	PPE Register Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the construction phase
				6.4	Contractors are to submit a safety file to South Group Recycling for approval prior	Safety file reviews, inductions and contractors' agreements	ECO/WMCO SHEQ Manager	Once off

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
				to undertaking any work on site			
			6.5	Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the construction phase

6.3 Environmental Management Programme - Operational Phase

Table 5: Operational Phase EMPr

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY	
ASPECT: AIR QUALITY								
1.	Activity:	<ul style="list-style-type: none"> - Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion - Burning of waste & open fires - Crushing and screening of catalytic converter substrate to a fine powder - Handling, loading and offloading of waste - Fumes and emissions generated from e-waste treatment activities - Generation of offensive odors 						
		Deterioration in local air quality, particularly within and immediately surrounding the project site due to the generation of fugitive dust emissions and the release of greenhouse gas emissions	Minimise and limit greenhouse gas emissions Prevent or minimise the deterioration of ambient air quality	Compliance with the - Compliance with the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), as amended National Ambient Air Quality Standards (GN 1210) as amended	1.1	Draft and implement a Fugitive Emissions Management Plan (FEMP) detailing odour and dust nuisance mitigation measures The plan must be submitted to the City's Air Quality Officer (AQO) for review and approval	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager
	Generation of offensive odours leading to nuisance conditions to surrounding landowners and occupants	Prevent or minimise the generation of offensive odours at levels likely to cause nuisance conditions	National Dust Control Regulations, GN 7335 of 31 March 2026 City of Cape Town Air Quality Management By-Law (Provincial Gazette	1.2	Milling & crushing machinery must be housed within a sealed, negative-pressure unit to prevent dust emissions to escape into the warehouse and ambient air	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the operational phase

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
		No: 7662 dated 17 August 2016) as amended - Section 4: Duty of care (Reasonable measures to prevent air pollution).	1.3	Crushing and milling activities to be equipped with an extraction unit suitable in capturing fugitive emissions.	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the operational phase
		- Section 4: Duty of care (Reasonable measures to prevent air pollution).	1.4	Warehouse must be well ventilated and equipped with a suitable ventilation system to allow effective air flow through operational areas	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the operational phase
		- Section 19: Emissions caused by open burning (Authorisation of open burning and burning of material).	1.5	Strict housekeeping measures to be maintained throughout operational areas	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the operational phase
		- Section 25: Emissions that cause a nuisance (Prohibition of emissions that cause nuisances).	1.6	All crushing, screening and milling activities are to be housed within the warehouse structure	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the operational phase
			1.7	All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	Service records and logs Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the operational phase

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
		Section 26: Emissions that cause a nuisance (Dust Emissions).	1.8	Minimize vehicle and equipment idling times	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the operational phase
			1.9	Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels	Operators and contractors to undertake regular inspections to identify and repair excessive exhaust emissions	ECO/WMCO SHEQ Manager	Throughout the operational phase
			1.10	Burning of waste or open fires are not permitted on site	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the operational phase
2.	ASPECT: WASTE MANAGEMENT						
	Activity:	<ul style="list-style-type: none"> - Waste handling, transport and processing - Waste generated from operational activities - Storage of waste on-site - Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, batteries, e-waste, chemicals) from operational equipment and or vehicle maintenance - Waste removal and transport - Poor housekeeping and waste management practices 					
Littering, visual impacts, odour generation, and attraction of pests and	Minimise the generation of waste through the implementation of waste avoidance, reduction,	National Norms and Standards for the Storage of Waste	2.1	A site-specific Waste Management Plan to be developed and implemented	Keep an up-to-date register of service providers and approved waste management	ECO/WMCO SHEQ Manager BM	Throughout the operational phase

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
<p>vermin if not properly managed</p> <p>Visual degradation of the site leading to nuisance conditions to surrounding land users and the attraction of vermin</p> <p>Potential contamination of soil, surface water, and groundwater if improperly handled or stored</p> <p>Risk of hydrocarbon spills, leaks & site fires</p> <p>Potential cross-contamination of recyclable, general, and hazardous waste if inadequate waste management practices are implemented</p>	<p>reuse, recycling, and recovery principles</p> <p>Prevent littering and illegal dumping within and around the project site</p> <p>Promote responsible waste management practices among employees, contractors, and visitors through training and awareness programs</p> <p>Maintenance of good housekeeping measures</p> <p>Ensure the safe handling, storage, transportation, and disposal of waste to prevent pollution and environmental degradation</p>	<p>National Environmental Management: Waste Act (Act 59 of 2008) and associated regulations, as amended</p> <p>Municipal bylaws and regulations – City of Cape Town Municipality</p>	2.2	Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers	<p>facilities authorized to remove waste from site.</p> <p>Keep records of waybills, delivery notes and transporter slips for waste removed</p>		
			2.3	Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the intended recycling, recovery, treatment or disposal.	<p>Site inspections, internal and external audits</p> <p>Training records and registers</p> <p>Contractors’ agreement</p> <p>Induction records</p>		
			2.4	Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information			
			2.5	Labelled containers are to be available on site for the source separation and collection of waste prior to			

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
				being removed from site for recycling, recovery, treatment			
			2.6	Train employees and operators on approved waste management measures to be implemented, including the correct disposal, separation and handling methods as applicable			
			2.7	Contractors to be provided a copy of the WML as well as EMPr prior to commencement of any activity on site			
ASPECT: WATER AND SOIL POLLUTION							
3.	Activity: <ul style="list-style-type: none"> - Illegal dumping of waste - Hydrocarbon spills - Oil leaks from vehicles, equipment and machinery - Hazardous waste coming into contact with storm water leading to leachate generation - Maintenance of equipment machinery and vehicles - Vehicle or machinery malfunction 						
Soil, surface water and potentially ground water contamination	Prevention of soil and stormwater contamination	Compliance with the National Norms and Standards for the Storage of Waste	3.1	Vehicles, equipment or machinery which is no longer in use must be removed from site.	Site inspections, internal and external audits	ECO/ WMCO SHEQ	Throughout the operational phase

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
<p>Potential storm water contamination</p> <p>Maintenance of equipment, vehicles or machines posing a risk of hydrocarbon leaks leading to soil or potential surface water or storm water contamination</p> <p>Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination</p>			3.2	Operations should be confined to the boundaries of the warehouse leased by South Group Recycling			
			3.3	No waste is to be stored outside the warehouse			
			3.4	All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur	Maintain an incident register	ECO/ WMCO SHEQ	Throughout the operational phase
			3.5	The facility is to develop and implement a spill response procedure	Spill kit checklist to form part of the ECO/WMCO site inspections	ECO/ WMCO SHEQ	Throughout the operational phase
			3.6	All vehicles and machinery are to be serviced and maintained in accordance with manufacturer specifications	Service records and logs	ECO/ WMCO SHEQ	Throughout the operational phase
			3.7	All maintenance undertaken outside buildings (i.e. on roads, paving or any exposed area exposed) must be undertaken with drip trays to capture any spills or leaks	Site inspections, internal and external audits	ECO/ WMCO SHEQ	Throughout the operational phase
4.	ASPECT: NOISE						

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
Activity: <ul style="list-style-type: none"> - Operational activities generating high noise levels - Use of machinery and equipment and machinery (grinders, welding machines, etc. 							
Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss Nuisance conditions to surrounding landowners and occupants due to high noise levels during the operational phase	Limit noise generation at levels likely to result in nuisance conditions to surrounding landowners and occupants Prevent or limit noise induced hearing loss to employees and personnel	Compliance with the National Noise Control Regulations (GNR 154)	4.1	Waste recycling, recovery and treatment activities are to be restricted to normal operating hours maintained by South Group Recycling	Training records and registers Occupational noise surveys to be undertaken in accordance with the requirements set out in terms of the Occupational Noise Regulations of the OHSA An external complaints handling procedure and complaints register to be implemented	ECO/WMCO SHEQ Manager BM	Throughout the operational phase
		Compliance with municipal by-laws regulating noise in industrial areas	4.2	All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection.			
		Compliance with the Western Cape Noise Control Regulations	4.3	Employees are to be made aware of noise induced hearing loss and appropriate prevention measures			
		Compliance with the Noise Exposure Regulations published in terms of the Occupational Health and Safety Act (Act No. 85 of 1993)	4.4	An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party			

IDENTIFIED IMPACT		OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
5.	ASPECT:	TRAFFIC						
	Activity:	<ul style="list-style-type: none"> - Increased number of vehicles traveling to and from site - Movement of vehicles both on and around the site 						
	Increased traffic congestion Damage to property Degradation of road and traffic infrastructure	To optimally manage traffic flow in and out of the operational site Limit property damage Limit infrastructure degradation	National Traffic Regulations Occupational Safety Regulations	5.1	Appropriate signage must be displayed throughout the site to ensure appropriate flow of traffic both in and out of the site as applicable	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the operational phase
				5.2	No parking of trucks or vehicles outside the boundary of the operational site is permitted	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the operational phase
				5.3	All vehicles employed and owned by South Group Recycling are to be road worthy and comply with the National Traffic Regulations.	Vehicle registrations and road worthy certifications Contractors' safety file to include vehicle and operator licensing as applicable Vehicle inspection checks	ECO/WMCO SHEQ Manager	Throughout the operational phase
5.4				No vehicles are to be overloaded	Records of weighbridge slips, release notes,	ECO/WMCO SHEQ Manager	Throughout the operational phase	

IDENTIFIED IMPACT		OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
						weigh bills are to be maintained		
6.	ASPECT:	HEALTH AND SAFETY						
	Activity:	<ul style="list-style-type: none"> - Manual sorting and handling of waste (e-waste and spent catalytic convertors) - Movement of vehicles - Moving equipment - Stacking of material - Sharp objects, uneven surfaces and tripping hazards - Use and handling of heavy machinery and equipment 						
Personal injuries		Reduced risk of personal injuries	Compliance with the Noise Exposure Regulations published in terms of the Occupational Health and Safety Act (Act No. 85 of 1993)	6.1	Suitable and sufficient fire-extinguishing equipment must be placed at strategic locations and must be adequately maintained	Fire extinguisher checks, inspections and maintenance records	External Service Provider SHEQ	Throughout the operational phase
Noise induced hearing loss		Avoid and limit noise induced hearing loss		6.2	All equipment used on site may only be operated by appropriately trained and / or licensed personnel	License, permits and relevant training registrations and certificates	ECO/WMCO SHEQ Manager	Throughout the operational phase
Tripping hazards		Avoid and limit respiratory impacts on employees and personnel		6.3	PPE and safety gear appropriate to the task being undertaken is to be provided to all site personnel (e.g., hard hats, safety boots, reflective vests, masks etc.)	PPE Registers Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the operational phase
Falling objects								
Exposure to fine dust								

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
			6.4	Contractors are to submit a safety file to South Group Recycling for approval prior to undertaking any work on site	Safety file reviews, inductions and contractors' agreements	ECO/WMCO SHEQ Manager	Once off
			6.5	Appropriate signage must be displayed on site to indicate the minimum PPE requirements for entry	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the operational phase
			6.6	All ablution facilities, kitchen, changing rooms, and general factory/offices areas must be cleaned and maintained daily to ensure a clean and hygienic work environment for all employees.	Site inspections, internal and external audits	ECO/WMCO	Site inspections, internal and external audits

6.4 Environmental Management Programme - Decommissioning and Closure Phase

The facility has no plans to close/ decommission at this time. Should closure or decommissioning of the facility become applicable, a decommissioning plan must be developed and an application for the closure of the site submitted to the relevant authority as required.

Table 6: Decommissioning Phase EMPr

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
1.	ASPECT: AIR QUALITY						
	Activity: - Release of greenhouse gas emissions from vehicles, trucks, generators, and heavy machinery due to fossil fuel combustion - Burning of waste & open fires						
Deterioration in local air quality, particularly within and immediately surrounding the project site due to the generation of fugitive dust emissions and the release of greenhouse gas emissions	Minimise and limit greenhouse gas emissions Prevent or minimise the deterioration of ambient air quality	Compliance with the - Compliance with the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004), as amended National Ambient Air Quality Standards (GN 1210) as amended	1.1	Update the approved Fugitive Emissions Management Plan (FEMP) to address relevant decommissioning activities as applicable	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the decommissioning phase
		National Dust Control Regulations, GN 7335 of 31 March 2026 City of Cape Town Air Quality Management By-Law (Provincial Gazette	1.2	Dust control measures to be implemented during decommissioning	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the decommissioning phase

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
		No: 7662 dated 17 August 2016) as amended - Section 4: Duty of care (Reasonable measures to prevent air pollution). - Section 4: Duty of care (Reasonable measures to prevent air pollution).	1.3	Strict housekeeping measures to be maintained throughout operational areas	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the decommissioning phase
		- Section 19: Emissions caused by open burning (Authorisation of open burning and burning of material). - Section 25: Emissions that cause a nuisance (Prohibition of emissions that cause nuisances).	1.4	Minimize vehicle and equipment idling times	Equipment checks and verifications Site Inspections	ECO/WMCO SHEQ Manager	Throughout the decommissioning phase
			1.5	Use fuel-efficient machinery and equipment where feasible or alternatively promote the use of low sulphur containing fuels	Operators and contractors to undertake regular inspections to identify and repair excessive exhaust emissions	ECO/WMCO SHEQ Manager	Throughout the decommissioning phase

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
		Section 26: Emissions that cause a nuisance (Dust Emissions).	1.6	Burning of waste or open fires are not permitted on site	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager	Throughout the decommissioning phase
2. ASPECT: WASTE MANAGEMENT Activity: <ul style="list-style-type: none"> - Waste generated from decommissioning activities - Dismantling of machines and equipment - Generation of building rubble - Storage of waste on-site - Generation of hazardous waste (e.g., waste oils, contaminated rags, solvents, hydrocarbons) from decommissioning machinery and equipment 							
Littering, visual impacts on surrounding landowners and occupants Visual degradation of the site leading to nuisance conditions to surrounding land users Risk of hydrocarbon spills, leaks & site fires when decommissioning machinery and equipment	Minimise the generation of waste through the implementation of waste avoidance, reduction, reuse, recycling, and recovery principles Prevent littering and illegal dumping of waste Promote responsible waste management	National Norms and Standards for the Storage of Waste	2.1	Waste to be removed from site with the purpose of recycling, recovery, treatment and or disposal by licensed service providers	Site inspections, internal and external audits	ECO/WMCO SHEQ Manager BM	Throughout the decommissioning phase
		National Environmental Management: Waste Act (Act 59 of 2008) and associated regulations, as amended Municipal bylaws and regulations – City of Cape Town Municipality	2.2	Waste removed for the purpose of recycling recovery, treatment or disposal is only to be diverted to licensed facilities authorized to accept the waste for the	Training records and registers Contractors' agreement Induction records		

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
	practices among contractors Maintenance of good housekeeping measures			intended recycling, recovery, treatment or disposal.			
			2.3	Records of waste removed must be kept up to date and made available to external auditors or relevant authorities who may request such data and information			
			2.4	Contractors to be provided with a copy of the WML as well as the approved closure plan prior to commencement of any activity on site			
3.	ASPECT: WATER AND SOIL POLLUTION						
	Activity: <ul style="list-style-type: none"> - Illegal dumping of waste - Hydrocarbon spills - Oil leaks from vehicles, equipment and machinery - Hazardous waste coming into contact with storm water leading to leachate generation - Vehicle or machinery malfunction 						
Soil, surface water and potentially ground water contamination	Prevention of soil and stormwater contamination	Compliance with the National Norms and Standards for the Storage of Waste	3.1	All hydrocarbon spills or vehicle and equipment leaks must be cleaned up as soon as they occur	Site inspections, internal and external audits	ECO/ WMCO SHEQ	Throughout the decommissioning phase

IDENTIFIED IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
Potential storm water contamination			3.2	A spill response procedure is to be implemented		Appointed Contractor	
Machinery malfunction posing a risk of hydrocarbon spills or leaks leading to soil or potential surface water or storm water contamination			3.3	An incident register is to be maintained			
4. ASPECT: NOISE Activity: - Decommissioning activities generating high noise levels - Use of machinery and equipment and machinery (grinders, welding machines, etc.)							
Personal exposure to high noise levels over an extended period of time leading to noise induced hearing loss	Limit noise generation at levels likely to result in nuisance conditions to surrounding landowners and occupants	Compliance with the National Noise Control Regulations (GNR 154)	4.1	Decommissioning activities are to be restricted to normal operating hours maintained by South Group Recycling	An external complaints handling procedure and complaints register to be implemented Site inspections, internal and external audits	ECO/WMCO SHEQ Manager BM	Throughout the decommissioning phase
Nuisance conditions to surrounding landowners and occupants due to high noise levels during the decommissioning phase	Prevent or limit noise induced hearing loss to employees and personnel	Compliance with municipal by-laws regulating noise in industrial areas	4.2	All personnel undertaking high noise activities or that are working in high noise areas must be equipped with appropriate hearing protection.			
		Compliance with the Western Cape Noise Control Regulations	4.3	Employees are to be made aware of noise induced hearing loss and appropriate prevention measures			

IDENTIFIED IMPACT		OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	REF NR	MITIGATION MEASURES	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	FREQUENCY
			Occupational Health and Safety Act (Act No. 85 of 1993)	4.4	An external complaints register is to be maintained and all complaints relating to excessive noise recorded and appropriately addressed before feedback is provided to the complaining party			
5.	ASPECT:	SOCIO ECONOMIC						
	Activity:	- Loss of employment opportunities due to site closure and decommissioning						
Loss of employment opportunities when site closes		To benefit the local economy To mitigate the impacts on employees and the local economy	None	5.1	Engagement with employees in advance whilst following legal requirements.	None	Contractor	During closure phase

7 DOCUMENT RETENTION AND RECORD KEEPING

According to accepted international standards sufficient records shall be established and maintained to provide evidence of conformity to requirements and the effective operation of the relevant management systems throughout each phase of operation.

Records shall remain legible, readily identifiable, and retrievable in all appropriate areas to demonstrate conformance to requirements and to have an audit trail, which to verify the effective operation of Environmental Management.

Documents generated and used during each phase of operation as set out in tables Table 3- Table 6 above must be managed in accordance with the proposed measures set out below.

7.1 Hard copy retention schedule

Table 7: Document Retention Schedule

IDENTIFICATION OF RECORDS	RETENTION SCHEDULE		
	ACTIVE	HISTORY	RECORDS
Monitoring and measuring data	All phases	10 years	10 years
Disposal Certificates	All phases	10 years	10 years
Reports with State Departments	All phases	Indefinite	Indefinite
Corrective Action & Verification Forms	All phases	13 - 24 Months	5 years
Internal Audit Reports	All phases	13 - 24 Months	5 years
External Audit Reports	All phases	5 years	5 years
Copies of legal appointment letters	All phases	5 years after cancellation	5 years after cancellation
Documents demonstrating compliance to WML and EMPr conditions	All phases	5 years	5 years

7.2 General Requirements

- Any non-compliances to the requirements of the EMPr or Legal Authorisations held South Group Recycling, Cape Town must be reported to the relevant authorities within 48 hours.
- All documents shall be kept on site and be available for monitoring and auditing purposes.
- An Environmental Audit Team may require access to documentation for auditing purposes when site visits are conducted.

- Regular monitoring of all site works by the SHEQ and or the ECO/WMCO is imperative to ensure that any problems encountered are resolved punctually and amicably.

8 ENVIRONMENTAL AWARENESS AND TRAINING PROGRAM

The objectives of an Environmental Awareness Plan are:

- To inform employees and or contractors of any environmental risks which may result from their work;
- To inform employees and contractors of the manner in which the identified possible risks must be dealt with in order to prevent degradation of the environment; and
- To optimise the awareness of those involved in the waste management activities which have the potential to impact negatively on the environment and in doing so, promote the global goal of sustainable development.

8.1 Implementation

Environmental principles will be communicated to contractors, any newly appointed employees and visitors entering the site.

It is critical that all employees and contractors on site be aware of the requirements of the EMPr and the WML conditions. Incidents or impacts usually arise where people have not been made aware or educated about possible impacts their activities can have on site.

It is therefore recommended that an Environmental Training program be designed and implemented in line with the following;

- All South Group Recycling, Cape Town staff members and employees must be trained in Environmental Management principals and be made aware of the requirements in the EMPr, WML and applicable Norms and Standers.
- New employees must complete an induction when appointed.
- Records must be kept on site of any training undertaken
- The training material can be in any format as deemed appropriate by the ECO/WMCO as long as it is easily understandable and fit for the target audience.
- All contractors who may be appointed to undertake work on site must be provided with a copy of the approved EMPr and WML and sign a contractor's agreement, indicating that they have received copies of the relevant authorisations and undertake to comply with the content and conditions as set out therein.

- All visitors and contractors are to undertake the site-specific induction and sign a register of attendance prior to entering the operational areas.

8.2 Content of Environmental Awareness Plan

Key elements of the environmental awareness plan that should be addressed in the form of training:

- An explanation of sustainability;
- Water management and the importance of conservation;
- Air quality and odour management;
- Energy conservation;
- Waste management;
- The community and interested and affected parties;
- Reporting incidents; and
- Employee responsibilities.

9 MONITORING PROGRAMME

The monitoring programme allows for baseline monitoring prior to construction, monitoring during construction and monitoring during the operational phase of the operations. Minimum monitoring requirements are not addressed for closure, which must be expanded on when a detailed closure plan is developed prior to the commencement of the closure and decommissioning of the facility.

The objective of the monitoring programme is to ensure that the environmental management systems perform according to specifications, to act as an early warning system for pollution, to check compliance with licence requirements and for reporting purposes.

The following monitoring and auditing schedule is proposed for the operations of South Group Recycling, Cape Town facility;

Table 8: Monitoring and Reporting Programme

FREQUENCY	MONITORING APPLICABLE	DETAILS OF MONITORING
DAILY	Waste stream monitoring	<ul style="list-style-type: none"> - Records of hazardous waste transporters - Records of waste type and quantities received and dispatched from site - Records of destinations for waste dispatched - Records of waste quantities processed - Filing of waste manifest documents

FREQUENCY	MONITORING APPLICABLE	DETAILS OF MONITORING
	Health and Safety	<ul style="list-style-type: none"> - Register all incidents - Register all complaints
MONTHLY	Site checks and inspections Waste Inventory updates	- Monitoring of general housekeeping and overall operations
QUARTERLY	Waste reporting to SAWIC/ iPWIS	- Reporting of waste data
BI-ANNUALLY	WML, Norms and Standards and EMPr Internal Audit	- Compliance monitoring and report compilation
ANNUALLY	WML and EMPr External Audit	- Compliance monitoring and report compilation
BIENNIALLY	Occupational health surveys Norms and Standards external audit	<ul style="list-style-type: none"> - Occupational health surveys - Compliance monitoring and report compilation

10 EMERGENCY RESPONSE & ENVIRONMENTAL INCIDENTS

10.1 Emergency Response Plan

South Group Recycling, Cape Town must develop an emergency response plan which must address potential emergency situations such as spills, site fires, bomb threats, industrial action and or natural disasters such as floods.

The plan must be updated on an annual basis, and the reader should always ensure that they have the latest copy on hand. The emergency preparedness plan must also be reviewed after each major incident.

10.2 MAJOR INCIDENT REPORTING (NEMA S30)

In terms of NEMA, an **“incident”** is an unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.

Should a reportable incident occur, the protocol as set out in terms of Section 30 of the National Environmental Management Act (Act 107 of 1998), as amended, will apply and must be followed.

All records pertaining to the recording, reporting and conclusion to the incident must be kept in accordance with the hard copy retention schedule set out under section 7.1 of the approved EMPr.



11 CONCLUSION

The successful implementation of this EMPr and its management actions will ensure that compliance with the environmental legislative requirements are achieved and that the likelihood of impacts occurring is reduced sufficiently. This EMPr also outlines the required environmental awareness training of employees, supervisors, contractors and visitors, which will ensure that management of the environment will occur through cooperation.

The success of this EMPr and overall sustainability of the project will further increase as a result of the defined organisational and administrative arrangements for environmental management and monitoring of the proposed project as well as procedures for environmental control, in the event of pollution or similar events requiring action.



Annexure M: Draft Emissions Management Plan



Fugitive Emission Management Plan

South Group Recycling (Pty) Ltd

Unit 2, Marconi Estate, 2 Warbler Cl, Montague Gardens, Cape Town

Fugitive Emission Management Plan

12 June 2026

Where law meets sustainability.
Legal insight. Sustainable impact.

Report Title	South Group Recycling, Cape Town Fugitive Emission Management Plan
Report Date	12 June 2026
EAP Details	<p>LexEco (Pty) Ltd</p> <p>11 Alice Lane Building 3, 5th Floor Sandton, Johannesburg 2146</p> <p>Contact Person: Riette Landsberg EAPASA Reg Nr: 2025/20547</p> <p>Tel: 010 023 8543 Cell : 076 099 1290 Email: riette@lexeco.co.za</p>
Applicant Details	<p>South Group Recycling, Cape Town</p> <p>Unit 3 at 2 Warbler Close Montague Gardens Cape Town, 7442</p> <p>Contact Person: Wayne Clancy</p> <p>Tel: 069 631 4072 Cell: 071 761 7262 Email: wayne@south-group.co.za</p>
District Municipality	City of Cape Town Municipality

TERMS AND DEFINITIONS

TERM	DEFINITION
Dust	Settleable particulate matter, including any material composed of solid particles small enough to pass through a 1 mm screen but large enough to settle by virtue of their weight into the sampling container from the ambient air;
Fugitive dust	Solid airborne particulate matter generated or emitted from any source other than a stack or chimney;
Fugitive Emissions	Emissions to the air from a facility for which an emission license has been issued, other than those emitted from a point source.
Point Source	A single identifiable source and fixed location of atmospheric emission, and includes smoke stacks and residential chimneys;
Upset Conditions	Any temporary failure of air pollution control equipment or process equipment or failure of a process to operate in a normal or usual manner that leads to an emission standard being exceeded.
Area Source	An area source is a stationary facility or group of small, dispersed sources that release smaller quantities of pollutants into the air
Nuisance	An unreasonable interference or likely interference caused by dust to the use or enjoyment by an owner or occupier of his or her property or environment, or to the ordinary comfort, convenience and peace;
Non-Residential	Any area, of which the land is used for agricultural, industrial, transport, commercial, business or mining purposes as prescribed under schedule 2 of the Spatial Planning and Land Use Management Act, 2013 (Act No. 16 of 2013);
Residential	Any area of which the land is used for the purposes listed in schedule 2 of the Spatial Planning and Land Use Management Act, 2013 (Act No. 16 of 2013), excluding land used for agricultural, industrial, commercial, business, transport or mining purposes;

ABBREVIATIONS

ASTM	American Society for Testing and Materials
DFFE	Department of Forestry, Fisheries and the Environment
FEMP	Fugitive Emissions Management Plan
GN	Government Notice
SANAS	South African National Accreditation Standard
NEMA	National Environmental Management Act
NEMAQA	National Environmental Management Air Quality Act
MES	Minimum Emission Standards

TABLE OF CONTENTS

1.	INTRODUCTION.....	6
2.	PROCESS DESCRIPTION.....	6
3.	LEGISLATIVE OVERVIEW	8
3.1.	National Environmental Management: Air Quality Act (Act 39 of 2004) (“NEMAQA”)	8
3.2.	Ambient Air Quality Standards.....	9
3.3.	National Dust Control Regulations	9
3.4.	City of Cape Town Air Quality Management By-Law (2016, as amended)	10
4.	SITE LOCATION.....	11
4.1.	Surrounding Land Use	12
4.2.	Sensitive Receptors.....	12
5.	CLIMATE DESCRIPTION	14
5.1.	Mean Monthly Wind Direction and Speed	14
5.2.	Ambient Air Quality	15
6.	DESCRIPTION OF EMISSION SOURCES.....	16
6.1.	Potential Fugitive Emission Sources.....	16
7.	FUGITIVE EMISSION MANAGEMENT PLAN	19
7.1.	Aim.....	19
7.2.	Roles and Responsibilities	19
8.	EMISSION MANAGEMENT PLAN	21
9.	COMPLAINT RESPONSE PROCEDURE.....	27
10.	EVALUATION AND REVIEW.....	27

LIST OF FIGURES

Figure 1:	South Group, Cape Town	12
Figure 2:	Sensitive Receptors.....	13
Figure 3:	Mean temperatures and precipitation (Meteoblue, 2024)	14



Figure 4: Montague Gardens, Cape Town Annual Wind Rose..... 15

Figure 5: Complaint Response Procedures..... 27

LIST OF TABLES

Table 1: Prescribed Dustfall Rates 9

Table 2: Fugitive Emissions Management Plan, detailing Odour, Smoke, Gas and Fume Management 22



1. INTRODUCTION

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

In March 2026, South Group applied for a Waste Management License in terms of the National Environmental Management Waste Act (Act 59 of 2008) from the Department of Forestry, Fisheries and the Environment ("**DFFE**") (Application Ref: 12/9/11/L260310115340/9/N) for the recycling, recovery and treatment of e-waste and spent catalytic convertors. South Group intend to install additional equipment which will aid the existing operations in the processing of approved waste streams. In addition to the application for a WML, South Group also applied for registration in terms of the National Norms and Standards for the Storage of Waste (GN 926) and the National Norms and Standards for the Sorting, Shredding, Grinding, Crushing, Screening, Chipping or Bailing of General Waste (GN 1093).

Due to the nature of the proposed waste management activities undertaken by South Group at the Cape Town operations in association with a request relieved from the City of Cape Town Municipality this Fugitive Emissions Management Plan was drafted.

The purpose of this plan is to identify potential sources of fugitive dust or dour emissions associated with the proposed recycling, recovery and treatment of electronic waste and spent catalytic convertors and to establish practical measures to prevent, minimise and manage emissions.

The plan forms part of the facility's environmental management system and shall be implemented throughout the operational life of the facility.

2. PROCESS DESCRIPTION

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



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

➤ **E-Waste**

- Once received, workers manually sort through each load, separating material according to grade.
- Once sorted, workers start to systematically dismantle the units or materials using basic tools such as screw drivers, pliers and wire cutters.
- Recovered materials are again sorted into different categories such as:
 - **Valuable parts:** Printed circuit boards, wires containing copper, and components with precious metals.
 - **Reusable materials:** Plastics, glass, and metals.
- Reusable materials may be subject to additional processing such as crushing and screening, depending on client specifications.
- Circuit boards and or any components containing precious metals will be subject to additional crushing and screening.
 - Following initial crushing and screening, circuit boards will be loaded into a scientific oven and backed at low temperatures for a minimum of 24 hours before being allowed to cool before being fed into a manual screen which separates the different components.
- Once crushed and screened, final product is collected in bulk bags and sealed for export.

➤ **Spent Catalytic Convertors**

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

3. LEGISLATIVE OVERVIEW

3.1. 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 NEMAQA are to:

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

Significant functions detailed in NEMAQA include:

- The National Framework for Air Quality Management.

Institutional planning matters, including:

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

Air quality management measures including:

- The declaration of Priority Areas where ambient air quality standards are being, or may be, exceeded.
- The listing of activities that result in atmospheric emissions and which have the potential to impact negatively on the environment and the licensing thereof through an Atmospheric Emissions License ("AEL").
- The declaration of Controlled Emitters.
- The declaration of Controlled Fuels.
- Procedures to enforce Pollution Prevention Plans or Atmospheric Impact Reporting for the control and inventory of atmospheric pollutants of concern.
- Requirements for addressing dust and offensive odours.

3.2. Ambient Air Quality Standards

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.

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.

3.3. National Dust Control Regulations

The National Dust Control Regulations, 2026 were promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) to establish nationally applicable measures for the prevention, control and management of dust emissions. The Regulations prescribe acceptable dustfall rates for residential and non-residential areas, provide a standard methodology for dustfall monitoring, and outline the requirements for the development, implementation and review of Fugitive Dust Management Plans.

The Regulations prescribe a dustfall limit of 600 mg/m²/day (30-day average) for residential areas and 1 200 mg/m²/day (30-day average) for non-residential areas. Exceedances are permitted on no more than two occasions within a twelve-month period, provided that these do not occur in consecutive months. Dustfall monitoring must be undertaken using the SANS 1137 standard test method, or an equivalent method approved by a recognised authority.

Table 1: Prescribed Dustfall Rates

Restriction Areas	Dustfall rate (D) (mg/m ² /day, 30-day period)	Permitted Frequency of exceeding dustfall rate
Residential Area	D ≤ 600	Twice within a year, not occurring on sequential months
Non- Residential Area	D ≤ 1200	Twice within a year, not occurring on sequential months

In addition to the prescribed dustfall limits, the Regulations require identified persons to develop and implement a Fugitive Dust Management Plan where applicable. Such a plan must identify all potential sources of dust, describe the surrounding land uses within a 5 km radius, assign responsibility for implementation, prescribe best practicable dust control measures, establish procedures for managing

complaints and nuisance dust, and, where required, include a dustfall monitoring programme. The Regulations further require that records of complaints, corrective actions and implementation measures be maintained to demonstrate ongoing compliance and effective fugitive dust management.

3.4. City of Cape Town Air Quality Management By-Law (2016, as amended)

➤ **Section 4: Duty of Care (Reasonable measures to prevent air pollution)**

Section 4 of the City of Cape Town Air Quality Management By-Law (2016, as amended) establishes a general duty of care applicable to all persons undertaking activities that may impact on air quality. The provision is framed broadly and is preventative in nature, requiring that reasonable and practicable measures be taken to avoid the generation of air pollution, or where this is not possible, to minimise and remedy its effects.

Based on the context and implementation of the Municipal By-Laws, and specifically Section 4, all operators, regardless of scale or classification remain responsible for managing their air quality impacts. By undertaking relevant recycling, recovery and or treatment of e-waste and spent catalytic convertors, South Group Recycling, Cape Town must ensure to implement appropriate mitigation measures to reduce the risk of impact on air quality, prevent nuisance, health risks, or environmental degradation associated with air emissions.

➤ **Section 19: Emissions Caused by Open Burning (authorisation of open burning and burning of material)**

Section 19 of the City of Cape Town Air Quality Management By-Law (2016, as amended) regulates emissions arising from open burning by establishing a general prohibition on the burning of any material in the open air where such activity may cause air pollution or nuisance.

➤ **Section 25: Emissions that cause a nuisance (Prohibition of emissions that cause nuisances)**

Any activity that causes or is likely to cause a nuisance, regardless of whether the activity is otherwise authorised or compliant with specific emission limits is prohibited.

➤ **Section 26: Emissions that cause a nuisance (Dust Emissions).**

The City of Cape Town Air Quality Management By-Law (2016, as amended) specifically recognises dust emissions as a common source of air pollution and nuisance, particularly from industrial, construction, and material handling activities. In this context, the By-Law prohibits any activity that generates dust in such quantities or of such a nature that it causes, or is likely to cause, a nuisance to surrounding properties or the receiving environment.



The provision places a responsibility on operators to implement reasonable and effective dust control measures to prevent the generation and dispersion of particulate matter. These measures may include, inter alia, the suppression of dust through wetting, enclosure of operations, wind shielding, covering of stockpiles and vehicles, and the use of extraction or filtration systems where appropriate. The emphasis is on proactive management to limit fugitive dust emissions at source and to prevent off-site impacts.

This requirement applies irrespective of whether specific dust fall limits are exceeded, thereby reinforcing the principle that compliance is not solely based on numerical thresholds but also on the prevention of visible and perceptible nuisance conditions. As such, it supports the broader objective of protecting ambient air quality, public health, and the amenity of adjacent land uses.

4. SITE LOCATION

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

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

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

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



Figure 1: South Group, Cape Town

4.1. Surrounding Land Use

The site is located within the established Montague Gardens industrial area and is surrounded predominantly by industrial, warehousing, commercial and logistics-related land uses. Residential areas occur within the broader 5 km study area and include Milnerton, Bothasig, Sunset Beach, Summer Greens, Edgemoed, Monte Vista, Panorama and Brooklyn. Other notable land uses include transportation infrastructure such as the N1, N7 and M5 road networks, the Atlantic Ocean coastline and associated recreational areas to the west, portions of the Rietvlei wetland system, open spaces, and limited agricultural land to the north-east. Overall, the surrounding environment is characterised by a mixture of industrial, residential, commercial, transportation and recreational land uses.

4.2. Sensitive Receptors

A review of the surrounding environment within a 5 km radius of the South Group Recycling Facility identified several sensitive receptors that may potentially be affected by fugitive dust, odour, smoke, fumes and noise emissions associated with the proposed recycling, recovery and treatment activities.

As illustrated in Figure 2, several sensitive receptors were identified within the 5 km assessment radius, including:

- Residential communities located east, south and west of the facility;
- Educational facilities (schools) distributed throughout the surrounding residential areas;
- Healthcare facilities, including hospitals and clinics;
- Old-age homes and retirement facilities accommodating potentially vulnerable individuals;
- Recreational and public open spaces within the broader urban environment.

These receptors are considered sensitive due to the potential susceptibility of occupants to air quality impacts, particularly children, the elderly and individuals with pre-existing respiratory conditions. Schools, hospitals and retirement facilities therefore represent priority receptors for the management of fugitive emissions.

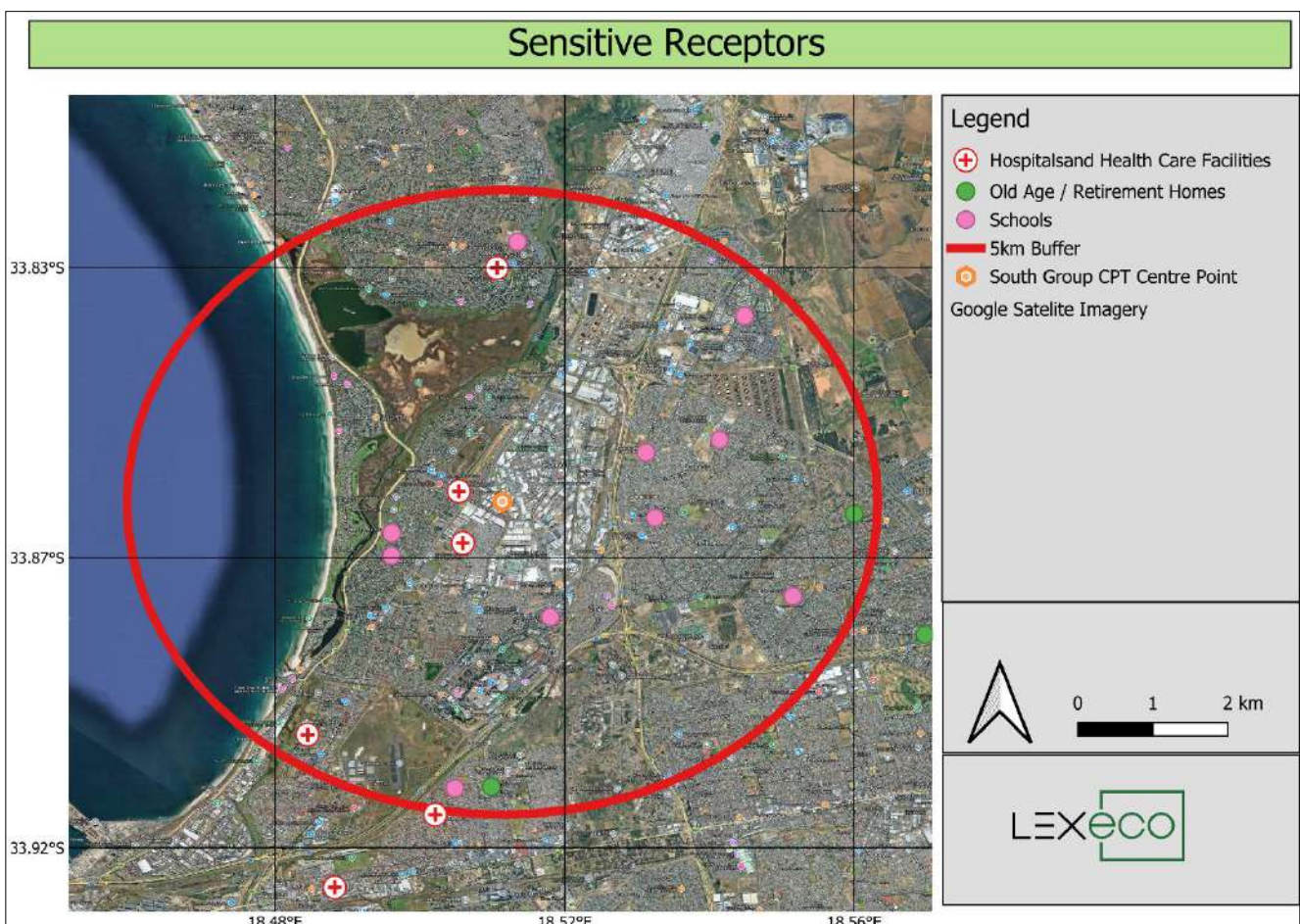


Figure 2: Sensitive Receptors

5. CLIMATE DESCRIPTION

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

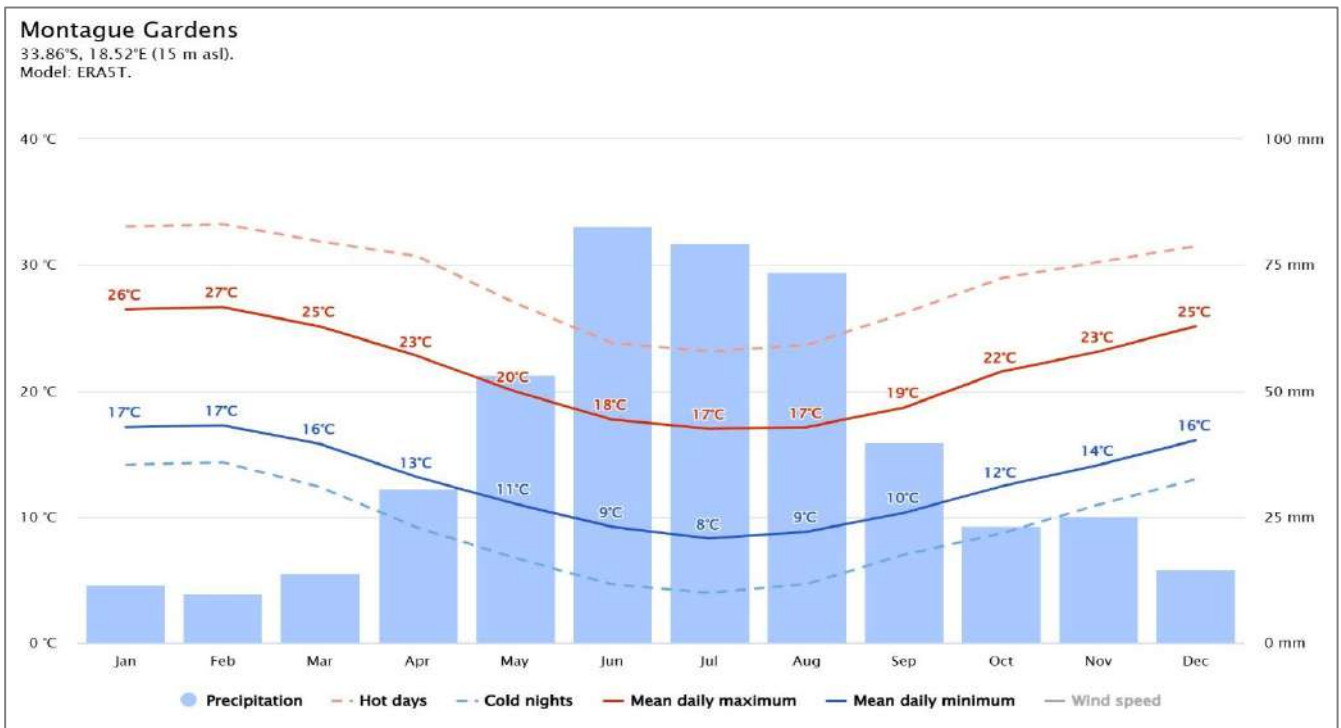


Figure 3: Mean temperatures and precipitation (Meteoblue, 2024)

5.1. Mean Monthly Wind Direction and Speed

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

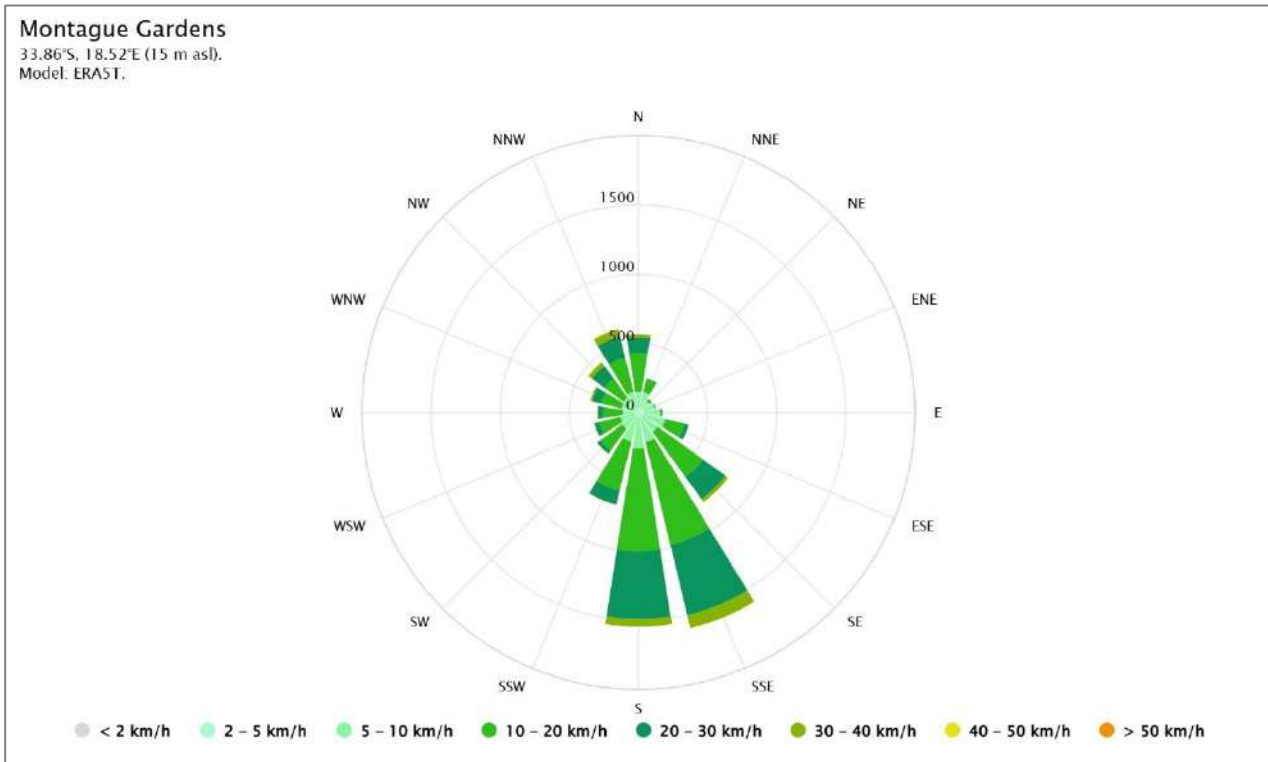


Figure 4: Montague Gardens, Cape Town Annual Wind Rose

5.2. Ambient Air Quality

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

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

Air quality in and around Cape Town is considered to be moderate to good for about 10 months of the year. This means that the recorded figures are between 12 and 35 $\mu\text{g}/\text{m}^3$. May to August tends to record the worst figures of between 35 and 54 $\mu\text{g}/\text{m}^3$ which classified it as being “Unhealthy for sensitive groups”.

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

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

6. DESCRIPTION OF EMISSION SOURCES

South Group Recycling operates from an existing enclosed warehouse facility where electronic waste and spent catalytic converters are received, stored, sorted, processed and prepared for export.

The proposed recycling operations include the use of:

- Horizontal crushers;
- Hammer mills;
- Vacuum filtration systems;
- Cone mixers;
- Scientific ovens;
- Sorting and separation equipment.

6.1. Potential Fugitive Emission Sources

Potential dust-generating activities include:

➤ Waste Handling Activities

- Transfer of processed materials between processing areas.

➤ Mechanical Processing Activities

- Crushing of electronic components.
- Hammer milling operations.
- Material size reduction activities.
- Screening and separation processes.
- Crushing and milling of ceramic powder
- Product packaging

➤ **Waste Handling and Storage**

- Temporary storage of waste and processed material (product).
- Handling of fine particulate material.
- Loading of processed material for transportation.

➤ **Vehicle Movements**

- Delivery vehicles entering and exiting the facility.
- Forklift operations.
- Internal movement of materials.

➤ **Housekeeping**

- Sweeping and cleaning of processing areas.
- Removal of accumulated dust from equipment and surfaces.



Photo 1: Product Storage



Photo 2: Material Handling and Storage



Photo 3: Horizontal Crusher



Photo 4: Operational Area



Photo 5: Chip Dismantling Station



7. FUGITIVE EMISSION MANAGEMENT PLAN

7.1. Aim

The primary objective of the Fugitive Emissions Management Plan (FEMP) is to identify all significant sources of fugitive emissions, evaluate the existing mitigation measures implemented to control measures, and recommend additional control measures where necessary to further minimise emissions and their potential impacts on the surrounding environment.

This objective will be achieved through the following key goals:

- **Objective 1:** Minimise fugitive emissions through the implementation of effective control and management measures.
- **Objective 2:** Promote effective communication and stakeholder engagement through structured internal and external reporting mechanisms, including the maintenance and management of an external complaints register

7.2. Roles and Responsibilities

➤ The Company (South Group Recycling)

The Company (South Group Recycling) must be familiar with the content of the FEMP and ensure that awareness of certain specifications, standards and procedures, pertaining to the site, are fully understood by the personnel in charge of the site and associated operations.

The Company (South Group Recycling) must also ensure that all the requirements of this FEMP are communicated to the employees / contractors and implemented accordingly.

South Group remains responsible for ensuring that all activities are implemented according to the provisions of the FEMP and conditions of the approved Waste Management License (WML), throughout all phases of the project. Although specific role-players will be appointed by South Group to perform certain functions on its behalf, the ultimate responsibility cannot be delegated. South Group must ensure that sufficient resources (time, financial, human, equipment, etc.) are available to these other parties and or employees to efficiently perform their tasks in accordance to the requirements of the approved FEMP and associated authorisations.



➤ **Branch Manager (BM)**

The Branch Manager must ensure that environmental commitments, legal requirements, and mitigation measures are effectively implemented and maintained at an operational level.

- Ensure that all activities undertaken at the facility comply with the requirements of the FEMP, environmental legislation, permit conditions, and licence requirements.
- Promote a culture of environmental responsibility throughout the branch.
- Ensure compliance with relevant authorisations as applicable.
- Appoint an Environmental Control Officer (ECO) to assist with day-to-day FEMP implementation and monitoring duties associated with the FEMP and approved authorizations.
- Ensure that the necessary waste licenses, environmental authorization and permits have been obtained and are maintained.
- Review operational procedures in conjunction with the ECO.
- Oversee the implementation of all mitigation and management measures contained within the FEMP.
- Ensure that environmental controls are incorporated into daily operations and maintenance activities.
- Allocate sufficient resources, personnel, and equipment for environmental management.

➤ **Environmental Control Officer (ECO) / Emissions Control Officer**

The Environmental Control Officer (ECO), also referred to as the Emissions Control Officer is responsible for monitoring, auditing, and reporting on compliance with the Fugitive Emissions Management Plan (FEMP), environmental authorisations, permit conditions, and applicable environmental legislation. The ECO is responsible in ensuring that environmental commitments are effectively implemented and maintained throughout the project lifecycle.

This role may be fulfilled by any suitably qualified and responsible representative involved with daily on-site operations.

In particular, the ECO shall:

- Monitor compliance with the FEMP, Waste Management Licence (WML) and other applicable permits, licenses and authorisations on an ongoing basis.
- Undertake regular site inspections and compile Environmental Inspection Reports as required,
- Identify environmental non-compliances and risks.
- Keep record of all activities on-site, problems identified and transgressions noted,
- Keep records relating to monitoring, reporting and auditing on-site and make them available for inspection to any relevant Competent Authorities (CA), and

- Continually advise the Company on all environmental issues.
- Facilitate internal auditing and reporting
- Arrange and assist with external auditing and reporting to relevant Competent Authorities (CA's)
- Keep records of all activities/incidents concerning environment performance;
- Keep a register of complaints from IAPs;
- Facilitate ongoing training and awareness of staff with regards to regulatory compliance.
- Liaise with relevant authorities;
- Liaise with contractors regarding environmental management and implementation of the FEMP.

➤ **SHEQ Manager**

The SHEQ Compliance Manager must ensure that an Occupational Health and Safety Plan is implemented during operations. The SHEQ Manager must also ensure that the corrective actions, required to keep the facility healthy and safe to all workers, are continuously implemented.

8. EMISSION MANAGEMENT PLAN

The effective management of fugitive emissions requires the implementation of appropriate engineering, operational, vehicle and maintenance controls.

Table 2 set out prescribed measures to be implemented by south group Recycling which will aid the facility in preventing, minimizing and managing dust as well as potential odour emissions associated with the facility's operations. Each measure has been assigned an implementation timeframe and performance indicator to facilitate monitoring, demonstrate compliance and ensure the ongoing effectiveness of dust as well as potential odour management practices at the facility.

Table 2: Fugitive Emissions Management Plan, detailing Odour, Smoke, Gas and Fume Management

Source / Activity	Specific Measures	Responsible Party	Frequency	Timeframe	Implementation Tracker / Performance Indicator
Crushing and Milling Operations	All crushing and milling equipment shall be operated within enclosed buildings to minimise the generation and dispersion of fugitive dust emissions.	Branch Manager (Implementation) / ECO (Verification)	Ongoing	Continuous	Ongoing inspections confirming activities occur within enclosed areas.
	Vacuum extraction systems shall be installed and maintained on crushing, milling and screening equipment to capture dust at source.	Branch Manager (Implementation) / ECO (Monitoring)	Ongoing	Continuous	Visual inspections confirming operational status.
	Dust collection units, filters and associated dust control equipment shall be inspected and maintained to ensure optimal performance.	Branch Manager (Implementation) / ECO (Inspection & Record Review)	Ongoing	Continuous	Visual inspection reports and maintenance records.
Material Transfer Points	Material transfer points, conveyors and discharge areas shall be enclosed where practicable to minimise fugitive emissions.	Branch Manager (Implementation) / ECO (Verification)	Ongoing	Continuous	Visual inspections and photographic records confirming transfer point enclosures are maintained.
Processing Building	Building doors and access points shall remain closed during crushing and milling activities where operationally feasible.	Branch Manager (Implementation) / ECO (Monitoring)	Ongoing	Continuous	Routine site inspections and supervisor observations.

Source / Activity	Specific Measures	Responsible Party	Frequency	Timeframe	Implementation Tracker / Performance Indicator
Loading and Unloading Activities	Minimise material drop heights during loading, unloading and handling activities to reduce dust generation.	Branch Manager (Implementation) / ECO (Monitoring)	Ongoing	Continuous	Weekly operational inspections and operator observations.
Material Storage and Handling	Avoid overfilling containers, skips and storage bins to prevent material losses and dust emissions.	Branch Manager (Implementation) / ECO (Monitoring)	Daily	Continuous	Visual inspections and absence of material spillages.
	Any spilled material shall be cleaned up on an ongoing basis to prevent dust generation and environmental nuisance impacts.	Branch Manager (Implementation) / ECO (Inspection)	Daily	Continuous	Housekeeping records and spill response logs.
General Facility Areas	Good housekeeping practices shall be maintained throughout the facility, including sweeping and removal of accumulated dust and debris.	All Site Personnel	Daily	Continuous	Daily housekeeping checklists and inspection records.
Warehouse Ventilation and Extraction Systems	The warehouse is to be equipped with suitable extraction systems to ensure proper ventilation of operational areas.	ECO (Inspection & Reporting) / Branch Manager (Corrective Actions)	Monthly	Monthly	Monthly inspection reports and maintenance records.
Dust Collection Equipment	Damaged or worn filters shall be replaced promptly to maintain dust control efficiency.	Branch Manager (Implementation) / ECO (Verification)	As required	As required	Filter replacement records and maintenance logs.

Source / Activity	Specific Measures	Responsible Party	Frequency	Timeframe	Implementation Tracker / Performance Indicator
Crushers, Mills and Screening Equipment	Crushing, milling and screening equipment shall be serviced and maintained in accordance with manufacturer specifications.	Branch Manager (Implementation) / ECO (Record Verification)	As per manufacturer's schedule	Ongoing	Equipment service records and maintenance schedules.
ODOUR, SMOKE AND FUME MANAGEMENT CONTROLS					
Waste bins	All bins and containers used to collect domestic waste and or food waste in the canteen or break room are to be cleaned out and emptied on a regular basis to prevent overflow and the generation of unpleasant odours	Branch Manager (Implementation) / ECO (Inspection)	Weekly	Continuous	Weekly inspections and housekeeping records.
Thermal Treatment / Oven Operations	Thermal treatment equipment shall be operated strictly within design specifications to prevent excessive smoke, fumes and odorous emissions.	Branch Manager (Implementation) / SHEQ Manager (Worker Exposure Oversight) / ECO (Monitoring)	Daily	Continuous	Daily operational logs and maintenance records.
	Extraction and ventilation systems shall be installed, operated and maintained to capture smoke, fumes and gases generated during processing.	Branch Manager (Implementation) / ECO (Monitoring) / SHEQ Manager (Health & Safety Oversight)	Monthly inspections	Prior to commissioning and ongoing	Maintenance logs, inspection records and evidence of operational extraction systems.

Source / Activity	Specific Measures	Responsible Party	Frequency	Timeframe	Implementation Tracker / Performance Indicator
Ventilation and Extraction Systems	The warehouse is to be equipped with suitable extraction systems to ensure proper ventilation of operational areas	ECO (Inspection & Reporting) / Branch Manager (Corrective Actions)	Monthly	Ongoing	Inspection records and maintenance reports.
Waste Storage Areas	Waste shall not be allowed to accumulate beyond storage capacity and shall be removed regularly to prevent odour generation.	Branch Manager (Implementation) / ECO (Inspection)	Weekly	Continuous	Waste removal records and inspection reports.
Facility-wide Operations	No open burning of waste, scrap material or residues shall be permitted on-site.	Branch Manager (Enforcement) / ECO (Monitoring)	Continuous	Continuous	Inspection records and absence of burning incidents.
Facility Boundary	Routine inspections shall be undertaken along the facility boundary to identify dust, smoke, fumes or odour nuisances affecting neighbouring properties.	ECO / Emissions Control Officer	Weekly	Continuous	Boundary inspection records and complaint register.

Source / Activity	Specific Measures	Responsible Party	Frequency	Timeframe	Implementation Tracker / Performance Indicator
Complaints Management	All odour, smoke, dust or fume complaints received from neighbouring properties shall be recorded, investigated within 24 hours and corrective actions implemented where required.	ECO / Emissions Control Officer	As required	Upon receipt of complaint	Complaints register, investigation reports and corrective action records.
Emergency Emissions Response	In the event of abnormal smoke, fumes, gas releases or equipment malfunction, affected operations shall be suspended until the source has been identified and rectified.	Branch Manager (Implementation) / ECO (Investigation & Reporting) / SHEQ Manager (Health & Safety Response)	As required	Immediate	Incident reports and maintenance records.

9. COMPLAINT RESPONSE PROCEDURE

Upon receipt of a dust-related complaint, the complaint shall be recorded in the site complaints register and investigated within 24 hours. The investigation shall identify the likely source and root cause of the complaint, following which appropriate corrective actions shall be implemented to prevent recurrence. Where contact details are available, the complainant shall be informed of the investigation findings and actions taken. All records relating to the complaint, investigation, and corrective measures shall be retained for auditing and compliance purposes, refer to Figure 5.

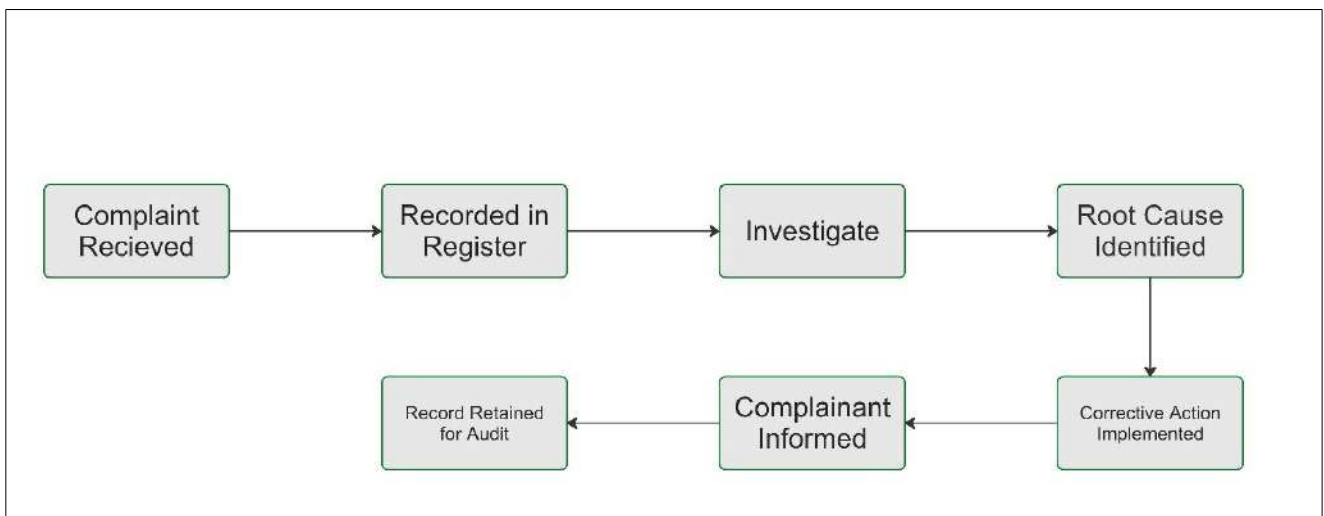


Figure 5: Complaint Response Procedures

A Dust Complaint Register shall be maintained on site and will entail the following aspects:

- Date and time of complaint
- Complainant details
- Nature of Complaint
- Investigation findings
- Corrective Actions Implemented
- Date of complaint addressed

10. EVALUATION AND REVIEW

This Fugitive Emission Management Plan (FEMP) is intended to be a dynamic management tool that is regularly reviewed and updated to ensure its continued effectiveness and relevance to site operations. As a minimum, the FEMP should be reviewed annually to confirm that it accurately reflects current activities, dust-generating sources, and control measures implemented on site. Additional reviews must be



undertaken whenever deficiencies in existing dust control measures are identified, new sources of fugitive emissions are introduced, or instances of non-compliance with the applicable dust fallout regulations occur.

Any revisions to the FEMP must be submitted to the City of Cape Town Municipality for review and approval. Once approval has been obtained, the updated management measures must be implemented on site and communicated to all relevant personnel. Where changes may affect operational procedures or responsibilities, appropriate training and awareness programmes must be provided to ensure effective implementation.

The successful implementation and continual improvement of this FEMP will facilitate the effective prevention, minimisation, and management of dust emissions associated with the recycling, recovery, and treatment of electronic waste and spent catalytic converters at South Group Recycling. The measures outlined in this plan are designed to promote compliance with applicable air quality legislation while safeguarding employees, neighbouring businesses, and surrounding communities from potential nuisance dust impacts.