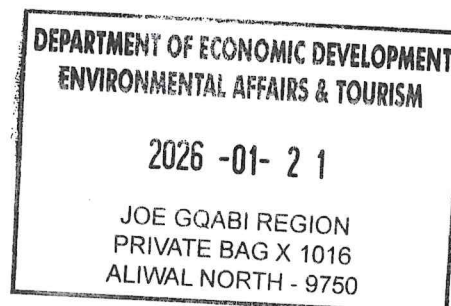


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Ref: JG/B/M/001/2025



Province of the
EASTERN CAPE
ECONOMIC DEVELOPMENT,
ENVIRONMENTAL AFFAIRS & TOURISM

Attention: Mr Kabedi Mashilo
Rambuda Consultants (Pty) Ltd
Erf 2141, 71 Arsenic Street
Clayville X26
1666
Cell: 076 422 2957
Email: marumo@rambudaconsultants.co.za



Dear Madam

Comments on Draft Scoping for the proposed development of a new landfill site in Maletswai in Walter Sisulu Local Municipality: Reference number JG/B/M/001/2025

The department has reviewed the Draft Scoping Report submitted by Rambuda Consultants for the subject mentioned above and has identified the following gaps: -

1. Application form, Project background and Listed Activities

- 1.1 Please provide a full list (4 corners) of coordinates demarcating the boundary of the site on which the proposed landfill development is to be undertaken.
- 1.2 The description of activities to be undertaken is vague and does not sufficiently detail the full description of associated structures and infrastructure, including landfill cells, liners, leachate management systems, stormwater diversion structures, and operational areas. Provide a detailed description of all activities and infrastructure components associated with the landfill site development.
- 1.3 The application indicates that the proposed development will have a Material Recovery Facility (MRF) and sorting facilities. Please provide the correct listed activity as per NEMWA (Act No. 59 of 2008) National Norms and Standards as amended.
- 1.4 Based on the above, you are advised to amend the listed activities applied for and ensure the request above is considered in the applied listed activities.
- 1.5 You are advised to describe the listed activities as listed in the EIA Regulations 2014 and Waste Management Activity List as amended and describe them in relation to the proposed activity.

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JP

1.6 Application Form Page 17 of 26, Section 2.2: “Recovery, Reuse, Recycling, Treatment and Disposal Quantities”, the quantities provided under this table do not correlate with the waste characterization and calculations presented under Section 1.3 in the Draft Scoping Report.

1.6.1. Please provide clear and transparent calculations.

1.7 Section 2.2 of the Application Form “onsite disposal Column” is not selected or marked and Draft Scoping Report is also silent about it-;

1.7.1. **Kindly be advised the application is for onsite disposal and please provide explanation why the Department must continue processing the application.**

1.8 Please justify the putrescible waste quantities presented in the table in Section 2.2 of the application form using Maletswai town-specific waste generation data and draft scoping report is also silent about it.

1.9 Please provide full calculations indicating how you arrived at the figures indicated for:

- (i) Waste Stream quantities and landfill capacity requirements,
- (ii) Estimated waste volumes
- (iii) Landfill airspace demand and,
- (iv) Climatic water balance

1.10 Kindly provide windows for the prevailing wind directions.

2. Project alternatives

2.1 Provide a motivation and concluding statement indicating the preferred alternatives, including the preferred location of the activity, which must be submitted with Final Scoping, considering *inter alia*:

- (i) Clearly describe all alternatives considered (including the no-go option),
- (ii) Provide a transparent alternatives assessment methodology,
- (iii) Present a defensible site selection matrix, and
- (iv) Provide a clear concluding statement motivating the preferred alternative.

3. Needs and desirability

3.1 The motivation for the need and desirability of the proposed landfill is not adequately substantiated, the focus is given on the existing landfill site. Please provide:

- (i) Clear demonstration of the need and desirability of the development within the context of the preferred location, taking into consideration the three pillars of sustainable development.

4. Impacts and Risk Identification

4.1 Please provide impact identification (in a table format) to adequately inform the EIA phase and specialist studies:

- (i) The nature, extent, duration, probability and significance of impacts,
- (ii) The reversibility of impacts,
- (iii) Potential irreplaceable loss of resources, and
- (iv) The extent to which impacts can be avoided, managed or mitigated.

5. Layout and sensitivity map

5.1 Kindly provide a topographic layout map that indicates the following:

- (i) The proposed landfill site (Preferred) and alternative sites
- (ii) Position of all proposed and associated infrastructure
- (iii) All supporting onsite infrastructure (existing and proposed)
- (iv) The location of sensitive environmental features on site (CBAs, ESAs, heritage sites, wetlands etc., that will be affected by the proposed activity)

5.2 A final layout map must be overlaid by the sensitive features and its buffer zone, with a clear and **detailed legend** that communicates the details of the map.

6. Public Participation

6.1 Please be advised that the draft scoping should be subjected to a 30-day public review for commenting, taking into consideration the closure of timeframes from 15 December to 5 January.

6.2 Kindly be advised that ECHRA is a key stakeholder in this project and therefore ensuring that they have access to the draft report is crucial. Based on the contact details provided under public participation, the department advises that the document be sent to ayanda.mncwabe-mama@ecsrac.gov.za.

6.3 Landfill site designs must be submitted to the Department of Water and Sanitation for the application of the Record of Decision.

6.4 Any comments and recommendations from stakeholders should be incorporated in the Final Scoping report, including all mitigation, protection and remedial measures to be undertaken to protect the environment from negative impacts associated with the activity.

6.5 Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.

7. Other comments

- 7.1 The draft scoping report includes editorial errors. At some point, it refers to Section 24G rectification in the Northwest. Please ensure that the document is adequately reviewed before submitting it to the department.
- 7.2 The Draft Scoping Report does not yet demonstrate alignment with the guidelines and municipal plans (IWMP).
- 7.3 Waste generation rates, assumptions and calculations have not been adequately substantiated across the draft report and application form.
- 7.4 Until the waste volumes, airspace and landfill lifespan are supported by transparent calculations, this then affects the landfill lifespan, classification and impacts of the proposed landfill that need to be assessed.

Kindly ensure that only relevant activities related to the proposed development are applied for, assessed and can be linked to the development activity or infrastructure as described in the project description. It is the responsibility of the EAP to ensure that the applicable listed activities are included in the application form and Final Scoping Report.

Please note that these comments are for the Draft Scoping report that was submitted to the Department only and that a review of the Final Scoping report will be required. Failure to address these comments may jeopardize the success of the application.

You are hereby reminded of Section 24F of the National Environmental Management Act (Act No 107 of 1998) as amended that no listed activity may commence prior to an environmental authorization being granted by the Department.

Yours Faithfully

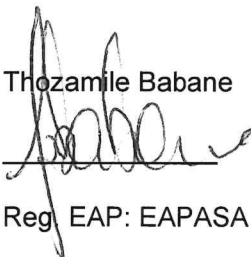
Phindile Dlamini



Date: 21/01/2026

Reg. EAP: EAPASA (2022/466).

Thozamile Babane



21/01/2026
Date:

Reg EAP: EAPASA