

From: Chris Edwards <chris@rotondo-walnuts.co.za>
Sent: Friday, 12 June 2026 12:32
To: marumo@rambudaconsultants.co.za; sivuyile.mbobob@wslm.gov.za;
akhona.soldaka@wslm.gov.za
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Phindile.Dlamini@dedea.gov.za; Penney Edwards; Didier Botes; Lukas van Zyl
Subject: Re: NOTICE OF A SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT FOR THE
PROPOSED DEVELOPMENT OF A LANDFILL SITE (CLASS B) AND ASSOCIATED
INFRASTRUCTURE ON THE REMAINING EXTENT OF PORTION 1 OF THE FARM MELK
SPRUIT NO. 12, WALTER SISULU LOCAL MUNICIPALITY, EAST

Attention:

Mr Kabedi Mashilo, Registered EAP – Rambuda Consultants (Pty) Ltd
(marumo@rambudaconsultants.co.za; info@rambudaconsultants.co.za)

The Waste Manager (Mr S. Mbobob) and the Municipal Manager – Walter Sisulu Local Municipality
(sivuyile.mbobob@wslm.gov.za; akhona.soldaka@wslm.gov.za)

cc: Ms Phindile Dlamini, Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), Joe
Gqabi Regional Office (Phindile.Dlamini@dedea.gov.za)

**RE: OBJECTION AND WRITTEN COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT
– PROPOSED DEVELOPMENT OF A CLASS B LANDFILL SITE AND ASSOCIATED INFRASTRUCTURE ON THE
REMAINING EXTENT OF PORTION 1 OF THE FARM MELK SPRUIT NO. 12, WALTER SISULU LOCAL
MUNICIPALITY, JOE GQABI DISTRICT, EASTERN CAPE – DEDEAT REFERENCE JG/B/M/001/2025**

This objection and comment is submitted within the public comment period ending 9 July 2026, and is submitted timeously.

1. CAPACITY AND INTEREST

1.1 We, Rotondo Walnuts (Pty) Ltd, are the owner and occupier of Farm 1093, Rouxville District (“our property”), an established, productive commercial walnut-farming enterprise under irrigation, producing for the export market, situated approximately 650 metres from the proposed preferred landfill site on the Remaining Extent of Portion 1 of the Farm Melk Spruit No. 12.

1.2 We are a directly affected party and an Interested and Affected Party (“I&AP”) for the purposes of the Environmental Impact Assessment Regulations, 2014 (GN R982, as amended by GN R326), made under section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”), read with the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (“NEMWA”). To the extent not already so recorded, kindly register us as a registered I&AP with immediate effect and confirm such registration in writing.

2. THE OBJECTION

2.1 We strenuously object to the proposed development at the preferred site and at Alternative Site 1. We do not object to the municipality's waste management objective as such. Indeed, at this stage we have no objection to Alternative Site 2, subject to our review of the further development plans for that site and a proper comparative assessment of the kind described in Section 3 below. Our objection in respect of the preferred site and Alternative Site 1 is recorded against this Draft Environmental Impact Assessment Report (“EIAR”), the associated draft Environmental Management Programme (EMPr), and against every phase and instrument of the application in so far as it relates to those sites, including the Final EIAR, the Integrated Environmental Authorisation, the Waste Management Licence, and any associated water-use authorisation.

**3. THE SITE-SELECTION JUSTIFICATION IS FLAWED: A SAFER SITE WAS REJECTED FOR COST AND
CONVENIENCE**

3.1 The site-selection table in the application (Table 1, “Site Selection”, in the Detail Design Report prepared by Imbawula Civil Projects (Pty) Ltd, Contract 77/2024/2025) compares the preferred site against two alternatives on five criteria: visual impact, proximity to watercourses, geotechnical conditions, availability of services, and potential for future expansion. The supporting text states that the preferred site was selected “due to its favourable environmental conditions, availability of services and potential for future expansion”.

3.2 The “proximity to watercourses” criterion, as applied, is misleading and masks the decisive risk. The table records the preferred site as “more than 200 m” from a watercourse, Alternative 1 as “less than 100 m”, and Alternative 2 as “more than 100 m”, and on that basis presents the preferred site as the most favourable of the three on water. Those figures can only refer to the minor, non-perennial tributary drainage lines in the vicinity – not to the Orange River. On the locality mapping, the preferred site is in fact the closest of the three sites to the Orange River, the single largest water resource in South Africa, lying only approximately 550 metres from it; Alternative 1 sits adjacent to a minor tributary (hence its poor score), and Alternative 2 lies on higher open ground, away from both the tributaries and the river. The criterion as scored therefore penalises Alternative 1 for proximity to a minor stream while entirely failing to disclose, or to score, the preferred site's proximity to the major river. The decision-maker has been presented with a matrix that, on the issue that matters most, points in exactly the wrong direction.

3.3 Properly analysed, the table shows that a safer site for the water resource was available and was rejected for reasons of cost and convenience. Alternative 2 is, on the applicant's own table and on the mapping, distant from both the tributaries and the Orange River – the least risky of the three to water. It was marked down on only two grounds: that it is “difficult to excavate” (geotechnical), and that it has no existing road or electricity (services). Likewise, the preferred site's advantages over the alternatives – existing road and electricity, and room for future expansion – are matters of cost and operational convenience, not of environmental protection. In substance, the site nearest the Orange River was preferred because it is cheaper and more convenient to service and to expand, and a site materially safer for the river was set aside because it would cost more to develop.

3.4 “Difficult to excavate” is not a lawful basis for placing the Orange River at risk. The geotechnical objection to Alternative 2 is, on the applicant's own formulation, one of difficulty, not impossibility. In law, engineering difficulty short of impossibility resolves itself into cost: harder ground is excavated by ripping, blasting and imported material, all of which are priced in rands and incurred once. Against that once-off premium stands a perpetual exposure: the landfill and its contents will remain in place, and remain hazardous, long after the design life of any liner, and contamination of the Orange River, once it occurs, is not remediable at any price. NEMA resolves that comparison decisively. Section 2(4)(b) requires the selection of the best practicable environmental option. Section 1 of NEMA defines that term as “the option that provides the most benefit or causes the least damage to the environment as a whole, at a cost acceptable to society, in the long term as well as in the short term.” The statute thus expressly contemplates that society bears reasonable cost in exchange for long-term environmental protection; it does not permit the inverse, in which a once-off saving in excavation cost is purchased by imposing a permanent risk upon the country's principal water resource and upon downstream users. To prefer the cheaper, riskier site is to externalise the avoided cost onto the river, the downstream agricultural economy and neighbouring landowners – the precise mischief that the polluter-pays principle in section 2(4)(p) (“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 must be paid for by those responsible for harming the environment”), and the risk-averse and cautious approach required by section 2(4)(a)(vii) (“that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions”), exist to prevent. An applicant that selects the riskier of the available sites in order to avoid the engineering cost of the safer one has not adopted the best practicable environmental option; it has cut corners, and it asks the public and its neighbours to carry the risk of the saving.

3.5 We accordingly require that the alternatives assessment be redone transparently and defensibly – a deficiency the Competent Authority has itself already raised at Scoping – scoring each site by its actual distance to the Orange River and by contaminant travel time to it, and properly weighting the protection of the river against the once-off engineering cost of the safer alternative. Until that is done, the preference for the site closest to the Orange River is not justified and cannot lawfully be authorised.

4. THE ONUS RESTS ON THE APPLICANT, AND THE EIAR ITSELF CONCEDES THAT CONTAINMENT IS NOT ABSOLUTE

4.1 The site drains to a catchment of the Orange River, on which extensive downstream commercial agriculture depends. Where a development places that resource at risk, the precautionary principle in section 2 of NEMA requires a risk-averse and cautious approach, and the onus rests on the applicant to demonstrate that the resource will be protected. It does not rest on affected parties to prove that harm will occur.

4.2 On the applicant's own evidence, that onus is not discharged, because the EIAR does not assert zero risk. The Draft EIAR concedes that the proposed composite liner will leak, predicting a leakage rate of approximately 1.7 litres per day across the landfill cell on an assumed defect density of one defect per hectare, which it characterises as “negligible”. It further concedes that, even where no

measurable leakage occurs, dissolved contaminants may migrate through the liner by molecular diffusion, independent of the integrity of the geomembrane.

4.3 We anticipate the response that, in real-world terms, “negligible” means a dose too small to cause harm once diluted. That response does not withstand scrutiny in this setting, for three reasons. First, the relevant load is not a single day but the cumulative discharge over an operating life of some twenty years and an indefinite post-closure period during which the waste remains hazardous far longer than any liner can be guaranteed or monitored. Second, the dilution assumption is unsafe here precisely because the EIAR concedes that groundwater movement in the underlying Beaufort Group mudstones is confined to fractures and weathered zones: fracture-controlled flow does not disperse and dilute uniformly, but can deliver a concentrated plume along a single pathway to a specific borehole or to the river, defeating the very dilution on which “negligible” depends. Third, the steady-state leakage figure excludes the events that actually cause pollution incidents in practice – construction defects beyond the assumed rate, liner degradation over time, accidental spills, and overtopping or failure of the pollution control dam during extreme storm events. The proper question is therefore not whether the modelled steady-state dose is “negligible”, but whether the applicant can give an assurance, approaching certainty, that the Orange River and our water resources will not be contaminated over the full life of the facility. It cannot. Where the facility can simply be located further from the river – indeed, where its own rejected Alternative 2 would achieve precisely that – there is no proper basis to impose that residual risk.

5. WATER RESOURCES, TOPOGRAPHY AND GROUNDWATER

5.1 The site drains towards the river and towards our farm. The preferred site sits at a materially higher elevation than the Orange River, with a net fall of approximately 30 to 40 metres over roughly 550 metres towards the river. While the intervening ground is undulating and the precise profile is not uniform, the net direction of drainage is not in dispute: the EIAR itself records that surface gradients of 1% to 5% direct overland flow towards the drainage channels of the catchment, which discharge to the Orange River. A waste facility placed above, and draining towards, a major river and adjacent farmland carries any escaped leachate, contaminated run-off, ash or litter by gravity towards precisely the resources that must be protected.

5.2 A critical omission: distance and travel time to the Orange River. Notwithstanding that the site lies close to the Orange River, the EIAR does not state the distance from the landfill cells to the river, nor model contaminant travel time to the river or to our boreholes in the event of leakage or diffusion. For a facility proposed this close to the country's largest water resource, that is a fundamental omission. We require a site-specific hydrogeological model establishing groundwater flow direction and gradient, the location of fracture pathways, and quantified contaminant travel time to the river and to our boreholes.

5.3 Water-use authorisation and duty of care. The development triggers, on the applicant's own admission, water uses under section 21(a) and (g) of the National Water Act, 1998 (Act No. 36 of 1998). The applicant and all responsible persons bear the duty under section 19 of that Act to prevent and remedy the pollution of water resources, and the general duty of care under section 28 of NEMA to prevent significant environmental degradation. South African courts enforce these duties against those who pollute rivers: in 2023 the North West High Court (Mahikeng) interdicted a municipality from allowing sewage to flow into the Harts River and its tributary, and ordered it to take remedial steps and rehabilitate the affected areas. Section 28 of NEMA imposes liability on anyone who causes, has caused, or may cause significant pollution to take reasonable measures to prevent it, reinforced by the polluter-pays and public-trust principles. We reserve our right to make full representations and to object to the Department of Water and Sanitation in respect of any Water Use Licence, General Authorisation or Record of Decision sought for this development.

6. IMPACTS ON OUR ORCHARDS

6.1 Acute sensitivity of our crop to pollution and disease. Our walnut orchards are highly sensitive to airborne, soil-borne and water-borne pollutants and to pathogens. A general waste landfill is a concentrated source of precisely these hazards – windborne litter and particulates, dust, bioaerosols, leachate, vermin and disease vectors, and scavenging birds. The siting of such a facility approximately 650 metres from our orchards presents an unacceptable and potentially irreversible risk of crop contamination, the introduction and spread of disease, and consequent loss of production.

6.2 The “prevailing wind” does not answer the risk. We anticipate reliance on our property being upwind of the prevailing wind. Prevailing-wind data describes the most frequent condition, not the worst case. Dust, odour, bioaerosols, windborne litter and, critically, smoke and fire embers travel on whatever wind is blowing at the time, and wind reversals, gusting fronts and seasonal berg-wind conditions routinely carry emissions in the opposite direction. The EIAR must assess worst-case and reverse-wind conditions, not merely the modal condition.

6.3 Smoke and particulate impacts on production. Smoke and airborne particulate matter that drift onto our property, even episodically, settle on leaf surfaces and reduce light interception, thereby impairing photosynthesis and, in turn, tree health, nut development and yield. This is a recognised agricultural harm, not a mere aesthetic nuisance, and must be assessed.

6.4 Fire risk to our orchards. Although open burning is prohibited at a licensed landfill, landfill fires – whether deliberately set during informal salvaging or arising spontaneously from landfill gas and the heat of decomposition – are a well-documented operational reality at general waste sites in South Africa. In *Kenton on Sea Ratepayers' Association and Others v Ndlambe Local Municipality and Others* [2016] ZAECHC 45 (reported as 2017 (2) SA 86 (ECG)), the Eastern Cape High Court considered a municipal waste dumpsite situated approximately 1.2 kilometres from the relevant river estuary, and found that it was nonetheless prone to fires, causing pollution and a fire hazard across nearby areas, with uncontrolled waste blown over neighbouring land; the Court granted a structural interdict compelling the municipality to extinguish and prevent burning, to contain the waste, and to remediate. We do not suggest the proposed engineered facility is identical to that legacy dumpsite. The point is one of distance and risk: even a facility more than twice as far from its watercourse as the proposed preferred site was found to generate fire, smoke and waste-migration impacts of legal significance to its neighbours. The EIAR must specifically and rigorously assess fire risk, landfill-gas management, and the risk of veld-fire and smoke propagation to adjacent agricultural land, having regard to the National Veld and Forest Fire Act, 1998 (Act No. 101 of 1998), which the applicant's own draft EMP lists as applicable legislation.

7. THREAT TO EXPORT PRODUCTION AND CERTIFICATION

7.1 Our produce is destined for the export market and is subject to stringent food-safety, phytosanitary and certification requirements (including GlobalGAP and applicable export protocols), which address contamination risk, hygiene, and the proximity of sources of contamination to the growing and handling of the crop. A general waste landfill in close proximity to our orchards – with its associated pests, vermin, scavenging birds, bioaerosols, dust, smoke and litter – directly threatens our ability to obtain and retain export certification, and therefore our market access.

7.2 There is a specific and aggravating feature of our crop. Walnuts are extremely high in oil, and oils readily absorb odours and volatile organic compounds from the surrounding environment – a property known as taint or odour uptake. Landfill odour and landfill-gas emissions in proximity to a high-oil-content nut crop therefore present a real risk of taint that compromises the quality and saleability of the product, quite apart from microbiological contamination, and that can cause product to fail quality and food-safety requirements at export. The consequences are not confined to our enterprise: a contamination or taint incident traced to product of South African origin can affect the standing and market access of the country's export sector more broadly. The loss or suspension of certification, or a taint-related rejection, would be catastrophic and, in practical terms, potentially irreversible for an established perennial-crop enterprise. The EIAR must assess this socio-economic impact specifically, including by reference to the certification standards to which export producers in our position are subject.

7.3 The harm extends directly to employment in the region. Our enterprise is one of the largest employers in the region, employing over 600 people during the season. Irreversible damage to our orchards, or the loss or suspension of our export certification, would have an immediate and severe impact on that workforce and on the livelihoods that depend on it, with knock-on consequences for the local economy. The NEMA principles in section 2 require that environmental management place people and their needs at the forefront, and that the social and economic interests affected by a decision be taken into account. A waste facility that imperils the region's largest or second-largest employer, in order to secure a cheaper and more convenient landfill site, does not serve those interests. The EIAR must assess this employment and socio-economic impact specifically, and weigh it against the limited cost saving that the preferred site represents.

8. FURTHER GROUNDS

8.1 Incompatible land use and loss of agricultural resources. Locating a waste facility in close proximity to established, high-value, productive agricultural land is fundamentally incompatible land use and undermines the conservation of agricultural resources. We reserve our right to refer this matter to the national and provincial departments responsible for agriculture and the protection of agricultural land.

8.2 Inadequate assessment of alternatives, and the availability of a better location. For the reasons set out in Section 3 above, the alternatives assessment is not defensible and must be redone, scoring each site by actual distance to the Orange River, gradient and contaminant travel time, and properly weighting environmental protection against once-off engineering cost. Where the same waste-management objective can be achieved at a site located materially further from the Orange River and from sensitive agricultural land, the imposition of risk on the country's largest water resource at the preferred location cannot be justified. The facility can be moved; the river cannot.

8.3 Inadequacy of the assessment to date. The Competent Authority has itself, at the Scoping stage, identified material gaps – including the substantiation of waste volumes, airspace and landfill lifespan, the layout and sensitivity mapping, the delineation of aquatic features and buffer zones, and alignment with the Integrated Waste Management Plan. Until these are fully and transparently resolved and made available for our scrutiny, an informed assessment of the impact on our property is not possible.

9. SPECIALIST STUDIES REQUIRED

9.1 We require that the EIAR include, and that we be given the opportunity to interrogate, site-specific specialist studies addressing at least: (a) a hydrogeological and groundwater contamination study stating the distance from the cells to the Orange River, establishing groundwater flow direction and gradient, identifying fracture and weathered-zone pathways, and quantifying contaminant travel time to the river and to our boreholes under both leakage and diffusion scenarios; (b) an independent review of the liner leakage and diffusion assessment, including the sensitivity of the predicted leakage to higher defect densities, to liner degradation over the post-closure period, and to accidental and storm-related failure of containment and the pollution control dam; (c) a revised and transparent alternatives assessment as set out in Section 3, scoring each site by actual distance to the Orange River and contaminant travel time, and costing the excavation of Alternative 2 so that the true price of the safer option is before the decision-maker; (d) an agricultural impact assessment addressing risk to perennial tree crops, the effect of dust and smoke deposition on photosynthesis and yield, the risk of odour taint to a high-oil-content nut crop, and the impact on export and phytosanitary certification; (e) an air quality, dust and odour assessment addressing worst-case and reverse-wind conditions; (f) a fire-risk and landfill-gas assessment addressing veld-fire and smoke propagation to neighbouring agricultural land; and (g) a stormwater and surface run-off assessment having regard to the downslope gradient towards the river and our property. Where any such study is absent or inadequate, the application is not ripe for authorisation.

10. RESERVATION OF RIGHTS

10.1 This objection is submitted without prejudice to, and in full reservation of, all our rights. In particular, and without limitation, we expressly reserve our rights:

- (a) to instruct independent environmental advisors, hydrogeologists, agricultural specialists and attorneys to investigate and interrogate the application and all reports and specialist studies, and to submit further detailed expert comment within the comment period and thereafter;
- (b) to supplement, amend and expand upon this objection, including once our specialist input is available;
- (c) to object to and appeal any Environmental Authorisation, Waste Management Licence, Water Use Licence or other authorisation granted, in terms of section 43 of NEMA and the National Appeal Regulations, 2014;
- (d) to apply for the judicial review of any decision in terms of the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000);
- (e) to seek interdictory relief, and to invoke our rights under section 24 of the Constitution and section 32 of NEMA (legal standing to enforce environmental laws); and
- (f) to pursue all civil and common-law remedies available to us, including in respect of nuisance, the pollution of our water and soil, fire and smoke damage, harm to our crop, odour taint, loss of export certification, and the diminution in the value, use and enjoyment of our property.

10.2 Nothing in this objection, and no participation by us in this process, constitutes consent to, acquiescence in, or condonation of the proposed development.

11. REQUESTS

11.1 We require written confirmation of receipt of this objection and of our registration as a registered I&AP.

11.2 We require that this objection be recorded in full in the Comments and Response Report and placed before the Competent Authority.

11.3 We require that the complete Draft EIAR and all specialist studies be furnished to us directly by email (we previously experienced difficulty accessing the documents via the download link provided), and that we be furnished with all further notices, reports and decisions directly and timeously by email.

For the reasons set out above, the application in its current form cannot lawfully be authorised at the preferred site or at Alternative Site 1. We present we have no objection to Alternative Site 2 but reserve our rights based on the outcome of further information of this alternative. We require that this objection and the studies it calls for be fully addressed before any decision is taken, and we look forward to the Competent Authority's response in due course

Yours faithfully,

Christopher Edwards

Director

On 08 Jun 2026, at 23:47, marumo@rambudaconsultants.co.za wrote:

Good day Colleagues,

Notice is hereby given in terms of regulation 43 of the Environmental Impact Assessment (EIA) Regulations of 2014 published in Government Notice (GNR) (R982) as amended by GNR 326 (07 April 2017) published in terms of Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended. As well as the provisions of the National Environmental Management Act: Waste Act, 2008 (Act No. 59 of 2008) (NEMWA) and National Water Act, 1998 (Act No. 1998) for the above-mentioned project.

Rambuda Consultants (Pty) Ltd has been appointed in terms of EIA Regulations 12 (1) by Imbawula Civil Projects (Pty) Ltd (on behalf of Walter Sisulu Local Municipality) as an Independent Environmental Assessment Practitioner to undertake the Scoping and Environmental Impact Assessment to obtain an Integrated Environmental Authorisation and Waste Management Licence for the proposed Landfill Site (Class B) and associated Infrastructure on the Remaining Extent of Portion 1 of the Farm Melk Spruit No. 12, Walter Sisulu Local Municipality, Joe Gqabi District Municipality, Eastern Cape Province.

Project Description and Location

The proposed project entails the establishment of a new Class B Landfill Site, with all associated infrastructures (including Landfill cells, Recycling (Sorting) facility, access roads, Access control/Security House, etc.). The central coordinate of the proposed project is 30°41'27.97" S 26°39'46.43" E (Preferred Site). Two (2) alternative sites are also considered: Alternative 01 (30°42'23.02" S 26°40'19.59" E) and Alternative 02 (30°42'27.27" S 26°39'27.81" E). All these sites are located on the same farm.

Integrated Environmental Authorisation (Waste Management Licence and Environmental Authorisation)

The proposed development triggers NEMWA-listed waste management activities for Category B (Activity 8 and 10) and A (Activity 3) (Government Notice No. 921 in Government Gazette No. 37083 of 29 November 2013, as amended), as well as Listed Activity No. 27 and 28 of Listing Notice 1, of EIA Regulations of 2014, as amended by R327. Based on the above-identified activities, a Scoping and Full Environmental Impact Assessment Process will be followed for the required application. The proposed development will also trigger section 21(a) and (g) of the National Water Act, 1998 (Act No. 36 of 1998).

Invitation to Participate

As part of the public participation process for this application, you are invited to give input or comments on the Draft Environmental Impact Assessment Report, which is accessible at the link below: <https://we.tl/t-qeYNAnZj5vWAJCC2>. Kindly forward your comments to the undersigned on or before end of business, Thursday (09 July 2026).

Please do not hesitate to contact us should you encounter problems accessing the reports.

Kind Regards,



Kabedi Mashilo (*Pr Nat Sci & Reg EAP*)
Environmental and Risk Manager
Registered Environmental Assessment Practitioner (EAPASA)
South African Council for Natural Scientists Professions (SACNASP)
BSc (Hons) Env Modeling & Mon (UNISA) and Water Man (IEMSA)
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Marumo@rambudaconsultants.co.za

From: marumo@rambudaconsultants.co.za <marumo@rambudaconsultants.co.za>

Sent: Tuesday, 02 December 2025 22:42

To: 'philisca@xsinet.co.za' <philisca@xsinet.co.za>; 'lynn@rotondo-walnuts.co.za' <lynn@rotondo-walnuts.co.za>; 'chris@rotondo-walnuts.co.za' <chris@rotondo-walnuts.co.za>; 'dukesjaza@gmail.com' <dukesjaza@gmail.com>; 'Mbuyimqela12@gmail.com' <Mbuyimqela12@gmail.com>; 'Soks1@gmail.com' <Soks1@gmail.com>; 'Neo.matwa@gmail.com' <Neo.matwa@gmail.com>; 'wesbou@netactive.co.za' <wesbou@netactive.co.za>; 'mollysfuneral@gmail.com' <mollysfuneral@gmail.com>; 'Mailboxserver0000@gmail.com' <Mailboxserver0000@gmail.com>; 'tsotielotietrading@gmail.com' <tsotielotietrading@gmail.com>

Cc: 'MashambaA@rambudaconsultants.co.za' <MashambaA@rambudaconsultants.co.za>; 'ChettyD' <chettyD@rambudaconsultants.co.za>

Subject: RE: NOTICE OF A SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF A LANDFILL SITE (CLASS B) AND ASSOCIATED INFRASTRUCTURE ON THE REMAINING EXTENT OF PORTION 1 OF THE FARM MELK SPRUIT NO. 12, WALTER SISULU LOCAL MUNICIPALITY, EAST

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Invitation to Participate

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Please do not hesitate to contact us should you encounter problems accessing the reports.

Kind Regards,



Kabedi Mashilo (*Pr Nat Sci & Reg EAP*)
Environmental and Risk Manager
Registered Environmental Assessment Practitioner (EAPASA)
South African Council for Natural Scientists
Professionals (SACNASP)
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From: marumo@rambudaconsultants.co.za <marumo@rambudaconsultants.co.za>

Sent: Thursday, 06 November 2025 11:10

To: 'MashambaA@rambudaconsultants.co.za' <MashambaA@rambudaconsultants.co.za>

Cc: 'Akhona Soldaka' <akhona.soldaka@wslm.gov.za>; 'Sivuyile Mbobo' <sivuyile.mbobo@wslm.gov.za>; 'Bulelani Citwa' <bulelani@imbawulacp.co.za>

Subject: RE: NOTICE OF A SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF A LANDFILL SITE (CLASS B) AND ASSOCIATED INFRASTRUCTURE ON THE REMAINING EXTENT OF PORTION 1 OF THE FARM MELK SPRUIT NO. 12, WALTER SISULU LOCAL MUNICIPALITY, EAST
Importance: High

Good day, Potential Interested and Affected Parties

Notice is hereby given in terms of 41(2) of the Environmental Impact Assessment (EIA) Regulations of 2014 published in Government Notice (GNR) (R982) as amended by GNR 326 (07 April 2017) published in terms of Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended. As well as the provisions of the National Environmental Management Act: Waste Act, 2008 (Act No. 59 of 2008) (NEMWA).

Rambuda Consultants (Pty) Ltd has been appointed in terms of EIA Regulations 12 (1) by Imbawula Civil Projects (Pty) Ltd (on behalf of Walter Sisulu Local Municipality) as an Independent Environmental Assessment Practitioner to undertake the Scoping and Environmental Impact Assessment to obtain an Integrated Environmental Authorisation and Waste Management Licence for the proposed Landfill Site (Class B) and associated Infrastructure on the Remaining Extent of Portion 1 of the Farm Melk Spruit No. 12, Walter Sisulu Local Municipality, Joe Gqabi District Municipality, Eastern Cape Province.

You have been pre-identified as a potential Interested and Affected Party to the project mentioned above.

Attached is the Background Information Document (BID) for the proposed development. The BID is also available in Sotho, IsiXhosa and Afrikaans. The document can be shared if required.

Kind Regards,



Kabedi Mashilo (*Pr Nat Sci & Reg EAP*)
Environmental and Risk Manager
Registered Environmental Assessment Practitioner (EAPASA)
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