



# **SECTION 24G ENVIRONMENTAL IMPACT REPORT**

**Dangerous Goods Storage Facilities at  
Isando Foods, 21 Quality Rd, Isando**

**FINAL FOR COMMENT**

**Proponent:**

Isando Foods (Pty) Ltd

**Project Reference:**

22548 – Isando Foods S24G

**Report Date:**

September 2026

**Report Reference:**

22548-FEIR-001

## DOCUMENT CONTROL

|                                   |                                                                           |
|-----------------------------------|---------------------------------------------------------------------------|
| <b>Project Name</b>               | Dangerous Goods Storage Facilities at Isando Foods, 21 Quality Rd, Isando |
| <b>Report Title</b>               | Environmental Impact Assessment Report                                    |
| <b>Authority Reference Number</b> | S24G/03/25-26/0726                                                        |
| <b>Report Status</b>              | Final                                                                     |

|                       |                        |
|-----------------------|------------------------|
| <b>Applicant Name</b> | Isando Foods (Pty) Ltd |
|-----------------------|------------------------|

|                                      | <b>Name</b>                                                                                                                                                                         | <b>Signature</b>                                                                                                                                                                 | <b>Date</b>       |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| <b>Document Compilation</b>          | <b>Mr. B. Collett</b> (B.Sc.<br>Hons. Env. Man.)<br>Cand. EAP   Cand.Sci.Nat<br><br><b>Mr. D. Botha</b><br>(M.A. Env.Man.) (PHED)<br>Wetland Specialist  <br>Reg. EAP   Pr.Sci.Nat. | <br><br> | July, August 2026 |
| <b>Document Review</b>               | <b>Mr. D. Botha</b><br>(M.A. Env.Man.) (PHED)<br>Wetland Specialist  <br>Reg. EAP   Pr.Sci.Nat.                                                                                     |                                                                                              | September 2026    |
| <b>Document Approval and Signoff</b> | <b>Mr. D. Botha</b><br>(M.A. Env.Man.) (PHED)<br>Wetland Specialist  <br>Reg. EAP   Pr.Sci.Nat.                                                                                     |                                                                                              | September 2026    |

## DOCUMENT PROGRESS

### Distribution List

| Date    | Report Reference Number | Document Distribution                                 | Format  |
|---------|-------------------------|-------------------------------------------------------|---------|
| 09/2026 | 22548-FEIR-001          | I&APs<br>Gauteng Department of Environment<br>(GDEnv) | Digital |
|         |                         |                                                       |         |
|         |                         |                                                       |         |
|         |                         |                                                       |         |
|         |                         |                                                       |         |
|         |                         |                                                       |         |

### Amendments on Document

| Date | Report Reference Number | Description of Amendment |
|------|-------------------------|--------------------------|
|      |                         |                          |
|      |                         |                          |
|      |                         |                          |
|      |                         |                          |
|      |                         |                          |

## INDEMNITY AND CONDITIONS RELATING TO THIS REPORT

The findings, results, observations, conclusions and recommendations given in this report are based on the author's best scientific and professional knowledge as well as available information. The report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken and Prism Environmental Management Services and its staff reserve the right to modify aspects of the report including the recommendations when new information becomes available from ongoing research or further work in this field or pertaining to this investigation.

Although Prism Environmental Management Services exercises due care and diligence in rendering services and preparing documents, Prism Environmental Management Services accepts no liability, and the client, by receiving this document, indemnifies Prism Environmental Management Services and its directors, managers, agents and employees against all actions, claims, demands, losses, liabilities, costs, damages and expenses arising from or in connection with services rendered, directly or indirectly by Prism Environmental Management Services and by the use of the information contained in this document.

This report must not be altered or added to without the prior written consent of the author. This also refers to electronic copies of this report which are supplied for the purposes of inclusion as part of other reports, including main reports. Similarly, any recommendations, statements or conclusions drawn from or based on this report must refer to this report. If these form part of a main report relating to this investigation or report, this report must be included in its entirety as an appendix or separate section to the main report.

Please note that maps and/or drawings included in this report are to provide context only and A3 copies are included in the appendices.

## **COPYRIGHT**

Copyright on all documents, drawings and records, whether manually or electronically produced, which form part of the submission and any subsequent report or project document, shall vest in Prism Environmental Management Services.

The client, on acceptance of any submission by Prism Environmental Management Services and on condition that the client pays to Prism Environmental Management Services the full price for the work as agreed, shall be entitled to use for its own benefit:

- The results of the project;
- The technology described in any report; and
- Recommendations delivered to the client.

Should the Proponent wish to utilise any part of, or the entire report, for a project other than the subject project, permission must be obtained from Prism Environmental Management Services to do so. This will ensure validation of the suitability and relevance of this report on an alternative project.

## TABLE OF CONTENTS

|                                                                                                      |            |
|------------------------------------------------------------------------------------------------------|------------|
| <b>DOCUMENT CONTROL .....</b>                                                                        | <b>II</b>  |
| <b>DOCUMENT PROGRESS .....</b>                                                                       | <b>III</b> |
| <b>TABLE OF CONTENTS .....</b>                                                                       | <b>VI</b>  |
| <b>LIST OF FIGURES .....</b>                                                                         | <b>IX</b>  |
| <b>LIST OF TABLES .....</b>                                                                          | <b>X</b>   |
| <b>1 INTRODUCTION.....</b>                                                                           | <b>11</b>  |
| 1.1 BACKGROUND OF PROJECT .....                                                                      | 11         |
| 1.2 LOCATION .....                                                                                   | 13         |
| 1.3 AUTHORITIES.....                                                                                 | 17         |
| 1.4 APPLICANT .....                                                                                  | 17         |
| 1.5 PROCESS TO DATE .....                                                                            | 18         |
| 1.6 EIA REPORT REQUIREMENTS AND OUTLINE.....                                                         | 23         |
| <b>2 ENVIRONMENTAL ASSESSMENT PRACTITIONER .....</b>                                                 | <b>27</b>  |
| <b>3 LEGISLATIVE FRAMEWORK .....</b>                                                                 | <b>28</b>  |
| 3.1 CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA.....                                                | 28         |
| 3.2 NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA), 1998 (ACT NO. 107 OF 1998) .....                   | 29         |
| 3.3 NATIONAL HERITAGE RESOURCE ACT (NHRA), 1999 (ACT NO. 25 OF 1999) .....                           | 32         |
| 3.4 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (NEM:BA), 2004 (ACT NO. 10 OF 2004) .....    | 32         |
| 3.5 NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE MANAGEMENT ACT (NEM:WA), 2008 (ACT NO. 59 OF 2008)..... | 33         |
| 3.6 OCCUPATIONAL HEALTH AND SAFETY ACT, 1993 (ACT NO. 85 OF 1993) .....                              | 34         |
| 3.7 NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004 (ACT NO. 39 OF 2004) .....              | 34         |
| 3.8 NATIONAL BUILDING REGULATIONS AND BUILDING STANDARDS ACT, 1977 (ACT NO. 103 OF 1977) .....       | 35         |
| 3.9 NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996) .....                                       | 35         |
| 3.10 PROTECTION OF PERSONAL INFORMATION ACT, 2013 .....                                              | 36         |
| 3.11 OTHER LEGISLATION AND GUIDELINES .....                                                          | 37         |
| <b>4 DESCRIPTION OF THE RECEIVING ENVIRONMENT .....</b>                                              | <b>42</b>  |
| 4.1 LOCAL CLIMATE .....                                                                              | 42         |
| 4.2 GEOLOGY AND SOILS.....                                                                           | 44         |
| 4.3 LAND USE .....                                                                                   | 44         |
| 4.4 EXISTING ACCESS ROADS .....                                                                      | 46         |
| 4.5 EXISTING SERVICES .....                                                                          | 47         |
| 4.6 AGRICULTURAL POTENTIAL.....                                                                      | 48         |
| 4.7 SOCIO-ECONOMIC ENVIRONMENT .....                                                                 | 49         |
| 4.8 TOURISM .....                                                                                    | 52         |

|           |                                                                  |            |
|-----------|------------------------------------------------------------------|------------|
| 4.9       | BIODIVERSITY .....                                               | 53         |
| 4.10      | SURFACE WATER.....                                               | 58         |
| 4.11      | ARCHAEOLOGY, CULTURAL HERITAGE AND PALAEOLOGY .....              | 59         |
| <b>5</b>  | <b>PROJECT DESCRIPTION.....</b>                                  | <b>60</b>  |
| 5.1       | PROPERTY AND LOCATION.....                                       | 60         |
| 5.2       | DESCRIPTION OF PROJECT ACTIVITIES .....                          | 64         |
| 5.3       | TIMEFRAMES .....                                                 | 69         |
| <b>6</b>  | <b>ALTERNATIVES .....</b>                                        | <b>70</b>  |
| 6.1       | NATURE OF THE ACTIVITIES .....                                   | 70         |
| 6.2       | ALTERNATIVES .....                                               | 70         |
| <b>7</b>  | <b>MOTIVATION FOR NEED AND DESIRABILITY .....</b>                | <b>73</b>  |
| 7.1       | OVERVIEW .....                                                   | 73         |
| <b>8</b>  | <b>PUBLIC PARTICIPATION.....</b>                                 | <b>75</b>  |
| 8.1       | OBJECTIVE AND PURPOSE OF PUBLIC PARTICIPATION.....               | 75         |
| 8.2       | PROTECTION OF PERSONAL INFORMATION ACT, 2013 .....               | 75         |
| 8.3       | PRELIMINARY NOTIFICATION.....                                    | 76         |
| 8.4       | NOTIFICATION AS PART OF EIR REVIEW .....                         | 77         |
| 8.5       | IMPACT ASSESSMENT PHASE COMMENT PERIOD .....                     | 78         |
| 8.6       | FINAL EIA REPORT AND GDENV DECISION.....                         | 79         |
| 8.7       | OUTCOME OF THE DECISION.....                                     | 79         |
| 8.8       | TIMEFRAMES .....                                                 | 79         |
| <b>9</b>  | <b>SUMMARY OF SPECIALIST STUDIES AND TECHNICAL REPORTS .....</b> | <b>80</b>  |
| 9.1       | STORMWATER MANAGEMENT PLAN .....                                 | 81         |
| 9.2       | WASTE MANAGEMENT PLAN.....                                       | 83         |
| 9.3       | EMERGENCY RESPONSE PLAN .....                                    | 85         |
| 9.4       | STACK EMISSION MONITORING PLAN.....                              | 87         |
| <b>10</b> | <b>IMPACT ASSESSMENT .....</b>                                   | <b>90</b>  |
| 10.1      | OVERALL IMPACT ASSESSMENT .....                                  | 90         |
| 10.2      | IMPACT ASSESSMENT METHODOLOGY.....                               | 90         |
| 10.3      | QUALITATIVE DISCUSSION OF IMPACTS .....                          | 93         |
| 10.4      | QUANTITATIVE IMPACT ASSESSMENT .....                             | 100        |
| 10.5      | DESCRIPTION OF IMPACTS .....                                     | 114        |
| 10.6      | MITIGATION.....                                                  | 120        |
| <b>11</b> | <b>ENVIRONMENTAL IMPACT STATEMENT.....</b>                       | <b>122</b> |
| 11.1      | SENSITIVE ENVIRONMENTAL FEATURES.....                            | 123        |

|           |                                                       |            |
|-----------|-------------------------------------------------------|------------|
| 11.2      | SUMMARY OF IMPACTS .....                              | 127        |
| 11.3      | RECOMMENDATIONS FROM SPECIALIST REPORTS.....          | 127        |
| 11.4      | ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE..... | 130        |
| 11.5      | REASONED OPINION OF EAP .....                         | 131        |
| <b>12</b> | <b>EAP UNDERTAKING .....</b>                          | <b>137</b> |
| <b>13</b> | <b>APPENDICES.....</b>                                | <b>138</b> |
| 13.1      | CURRICULUM VITAE OF EAP.....                          | 138        |
| 13.2      | SECTION 24 G .....                                    | 139        |
| 13.3      | A3 MAPS AND DRAWINGS.....                             | 143        |
| 13.4      | PHOTO REPORT .....                                    | 144        |
| 13.5      | PUBLIC PARTICIPATION .....                            | 145        |
| 13.6      | TECHNICAL REPORTS .....                               | 156        |
| 13.7      | ENVIRONMENTAL MANAGEMENT PROGRAMME.....               | 159        |
| 13.8      | DFFE SCREENING TOOL.....                              | 160        |
| 13.9      | APPROVED AUTHORISATIONS AND PERMITS .....             | 161        |
| 13.10     | FINANCIAL STATEMENTS .....                            | 162        |

## LIST OF FIGURES

|                                                                                                                                           |     |
|-------------------------------------------------------------------------------------------------------------------------------------------|-----|
| FIGURE 1-1: LOCALITY PLAN .....                                                                                                           | 14  |
| FIGURE 1-2: AERIAL LOCALITY PLAN (1:5000) .....                                                                                           | 15  |
| FIGURE 1-3: AERIAL LOCALITY PLAN (1:2000) .....                                                                                           | 16  |
| FIGURE 1-4: SECTION 24G PROCESS .....                                                                                                     | 21  |
| FIGURE 3-1: SOUTH AFRICAN ENVIRONMENTAL LEGISLATION HIERARCHY .....                                                                       | 28  |
| FIGURE 3-2: GAUTENG PROVINCE ENVIRONMENTAL MANAGEMENT FRAMEWORK MAP .....                                                                 | 31  |
| FIGURE 3-3: EKURHULENI PRECINCT PLAN .....                                                                                                | 41  |
| FIGURE 4-1: AVERAGE TEMPERATURE DATA FOR ISANDO (WORLD WEATHER ONLINE) .....                                                              | 42  |
| FIGURE 4-2: AVERAGE RAINFALL DATA FOR ISANDO (WORLD WEATHER ONLINE) .....                                                                 | 43  |
| FIGURE 4-3: WIND ROSE FOR THE ISANDO AREA (METEORBLUE) .....                                                                              | 43  |
| FIGURE 4-4: GEOLOGY MAP .....                                                                                                             | 44  |
| FIGURE 4-5: LOCALITY MAP INDICATING SITE ACCESS .....                                                                                     | 46  |
| FIGURE 4-6: GAUTENG AGRICULTURAL POTENTIAL ATLAS IV .....                                                                                 | 49  |
| FIGURE 4-7: EDUCATION LEVEL (CENSUS, 2011). .....                                                                                         | 50  |
| FIGURE 4-8: ACCESS TO PIPED WATER (CENSUS, 2011) .....                                                                                    | 50  |
| FIGURE 4-9: EDUCATION LEVEL (CENSUS, 2022). .....                                                                                         | 51  |
| FIGURE 4-10: ACCESS TO PIPED WATER (CENSUS, 2022). .....                                                                                  | 52  |
| FIGURE 4-11: C-PLAN V4 MAP .....                                                                                                          | 54  |
| FIGURE 4-12: GAUTENG PROVINCIAL ENVIRONMENTAL MANAGEMENT FRAMEWORK .....                                                                  | 56  |
| FIGURE 4-13: IBA AND PROTECTED AREAS .....                                                                                                | 57  |
| FIGURE 4-14: NWM6 .....                                                                                                                   | 58  |
| FIGURE 4-15: PALAEOLOGICAL (FOSSIL) SENSITIVITY MAP (OBTAINED FROM SOUTH AFRICAN HERITAGE RESOURCES INFORMATION<br>SYSTEM (SAHRIS). ..... | 59  |
| FIGURE 5-1: SITE DEVELOPMENT PLAN .....                                                                                                   | 62  |
| FIGURE 5-2: PROCESS FLOW DIAGRAM FOR NEW REFINERY ON SITE .....                                                                           | 65  |
| FIGURE 10-1: MITIGATION HIERARCHY .....                                                                                                   | 121 |
| FIGURE 11-1: ENVIRONMENTAL SENSITIVITY MAP. ....                                                                                          | 125 |
| FIGURE 11-2: NWM6. ....                                                                                                                   | 126 |

## LIST OF TABLES

|                                                                                     |     |
|-------------------------------------------------------------------------------------|-----|
| TABLE 1-1: DETAILS OF THE APPLICANT AND LANDOWNER .....                             | 17  |
| TABLE 1-2: GDENV REQUIREMENTS FOR THE ENVIRONMENTAL IMPACT REPORT.....              | 23  |
| TABLE 2-1: DETAILS OF THE EAP .....                                                 | 27  |
| TABLE 5-1: SURVEYOR GENERAL DIAGRAM NUMBERS. ....                                   | 60  |
| TABLE 5-2: CORNER COORDINATES. ....                                                 | 60  |
| TABLE 5-3: DESCRIPTION OF THE LISTED ACTIVITIES TRIGGERED UNDER NEMA. ....          | 63  |
| TABLE 8-1: TIMEFRAMES FOR THE SECTION 24G RECTIFICATION PROCESS. ....               | 79  |
| TABLE 10-1: NATURE AND TYPE OF IMPACT.....                                          | 90  |
| TABLE 10-2: CONSEQUENCE OF THE IMPACT OCCURRING. ....                               | 91  |
| TABLE 10-3: PROBABILITY AND CONFIDENCE OF IMPACT PREDICTION. ....                   | 91  |
| TABLE 10-4: SIGNIFICANCE RATING OF THE IMPACT.....                                  | 92  |
| TABLE 10-5: LEVEL OF CONFIDENCE OF THE IMPACT PREDICTION. ....                      | 92  |
| TABLE 10-6: MITIGATION EFFICIENCY.....                                              | 92  |
| TABLE 10-7: DEGREE OF REVERSIBILITY AND LOSS OF RESOURCES. ....                     | 93  |
| TABLE 10-8: POTENTIAL IMPACTS ASSOCIATED WITH LISTED ACTIVITIES. ....               | 94  |
| TABLE 10-9: HISTORICAL BACKGROUND AND DEVELOPMENT OF THE ISANDO FOODS FACILITY..... | 94  |
| TABLE 10-10: PROJECT ACTIVITIES.....                                                | 98  |
| TABLE 10-11: ENVIRONMENTAL ASPECTS.....                                             | 99  |
| TABLE 10-12: SUMMARY OF QUANTITATIVE IMPACT ASSESSMENT – CONSTRUCTION PHASE. ....   | 101 |
| TABLE 10-13: SUMMARY OF QUANTITATIVE IMPACT ASSESSMENT – OPERATIONAL PHASE.....     | 110 |
| TABLE 11-1: SPECIALIST RECOMMENDATIONS. ....                                        | 127 |

# 1 INTRODUCTION

## 1.1 BACKGROUND OF PROJECT

Isando Foods (Pty) Ltd operates a vegetable oil manufacturing facility situated at 21 Quality Road, Isando, on Portion 695 of the farm Witkoppie 332 IR, within the Ekurhuleni Metropolitan Municipality, Gauteng Province. The facility forms part of an established industrial area and relies on the storage of various dangerous goods that are integral to its manufacturing processes and operational continuity.

Isando Foods is located in the Isando industrial area. Isando Foods is further situated within **Zone 5 of the Gauteng Provincial Environmental Management Framework (GPEMF)**. This has direct implications for the applicability of certain listed activities and the requirement to obtain Environmental Authorisation (EA).

### **Listing Notice 1 (GN R983 of December 2014, as amended)**

#### **Activity 51:**

*The expansion and related operation of facilities for the storage, or storage and handling, of a dangerous good, where the capacity of such storage facility will be expanded by more than 80 cubic metres.*

However, this activity is excluded from the requirement to obtain Environmental Authorisation when undertaken within **Zone 5 of the GPEMF**.

In this regard, **GN 41473, Government Notice 164**, Appendix 1 (Excluded Activities), provides that the following activities under Listing Notice 1 are excluded from the requirement to obtain EA within Zone 5:

- Activity 14; and
- **Activity 51.**

The Isando Foods facility falls within **Zone 5**, which has been earmarked for industrial development purposes. Consequently, Activity 51 is excluded from the requirement to obtain Environmental Authorisation.

Isando Foods were required to register the activity in terms of the GPEMF. Same has not been completed.

As part of the continued operation and expansion of the manufacturing facility, Isando Foods undertook the expansion of its existing dangerous-goods storage infrastructure. To support its operations, Isando Foods established dangerous goods storage facilities comprising the storage of diesel, hexane, caustic substances and LO10/LCO with a combined storage capacity of approximately 461m<sup>3</sup>. These substances

are utilised in the vegetable oil extraction process, emergency power generation and general manufacturing operations. The storage infrastructure consists of purpose-built, bunded storage areas located within an already developed and fully paved industrial site, thereby minimising additional disturbance to the surrounding environment. The dangerous goods storage areas include appropriate containment measures, safety signage, fire protection systems, ventilation, spill containment infrastructure and restricted access in accordance with applicable industrial standards.

The dangerous goods storage facilities were expanded and became operational during 2023/2024 without first obtaining the required Registration / Environmental Authorisation from the Gauteng Department of Environment (GDEnv). The development therefore triggered Activity 51 of Listing Notice 1 (GN R327 of 2014, as amended) under the Environmental Impact Assessment Regulations, which applies to the expansion and related operation of facilities for the storage, or storage and handling of dangerous goods where the storage capacity is increased by more than 80 cubic metres. As the listed activity commenced prior to registering the activity with GDEnv, the applicant is required to obtain authorisation/registration retrospectively in terms of Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998).

Construction of the storage infrastructure was completed during June 2023, after which the dangerous goods storage became fully operational as part of the existing manufacturing facility. The development did not require the transformation of previously undisturbed land, as all infrastructure was established within an existing industrial complex that had already been extensively developed and paved. Historical satellite imagery confirms that the development occurred within an established industrial setting and resulted in minimal additional environmental disturbance.

Following the unauthorised commencement of the listed activity, Isando Foods (Pty) Ltd appointed Prism Environmental Management Services (Prism EMS) as the independent Environmental Assessment Practitioner to undertake the required Section 24G Rectification Process. The purpose of the application is to obtain retrospective Environmental Authorisation for the existing dangerous goods storage facilities and to assess the environmental implications of the development, together with the implementation of appropriate mitigation and management measures to ensure continued environmental compliance.

The Section 24G application therefore seeks to regularise the unlawful commencement of the listed activity while demonstrating that the storage facilities can continue operating within acceptable environmental standards through the implementation of appropriate operational controls and mitigation measures.

The Gauteng Provincial Environmental Management Framework (GPEMF) has also been considered as part of the assessment of the development's compatibility with the broader environmental and spatial planning objectives of Gauteng Province. The GPEMF was adopted through Government Notice 164 of 2018 (Government Gazette No. 41473 of 2 March 2018) and provides a provincial framework for guiding sustainable land-use management and environmental decision-making. The framework divides Gauteng into environmental management zones, including Zone 5: Industrial and Large Commercial Focus Zone, which is intended to facilitate appropriate industrial and large-scale commercial development in areas already utilised for such purposes or in suitably degraded areas with access to required infrastructure.

The Isando Foods facility is situated within an established industrial area and, based on the GPEMF spatial assessment previously undertaken for the site, falls within Zone 5 (Industrial and Large Commercial Focus Zone). This zoning is generally compatible with the existing industrial nature and land-use context of the Isando Foods facility. However, the GPEMF does not remove the requirement to obtain Environmental Authorisation where a development triggers a listed activity. The GPEMF Standard applies to activities specifically excluded from the requirement to obtain Environmental Authorisation and does not negate other applicable environmental legislation or authorisation or registration requirements.

Accordingly, the location of the Isando Foods facility within the GPEMF's industrial focus zone is considered a supporting spatial-planning consideration in the assessment of the Section 24G application, particularly given the site's established industrial character and existing infrastructure. It does not, however, retrospectively authorise the unlawful commencement of the identified listed activity or replace the Section 24G process.

## **1.2 LOCATION**

The site is located on Portion 695 of the farm Witkoppie 332 IR, Isando, Ekurhuleni Metropolitan Municipality, Gauteng Province, South Africa.

Coordinates: 26° 8'42.42"S, 28°12'28.81"E

Surveyor General Code: T0IR03320000069500000

Please refer to the locality map below, Figure 1-1.

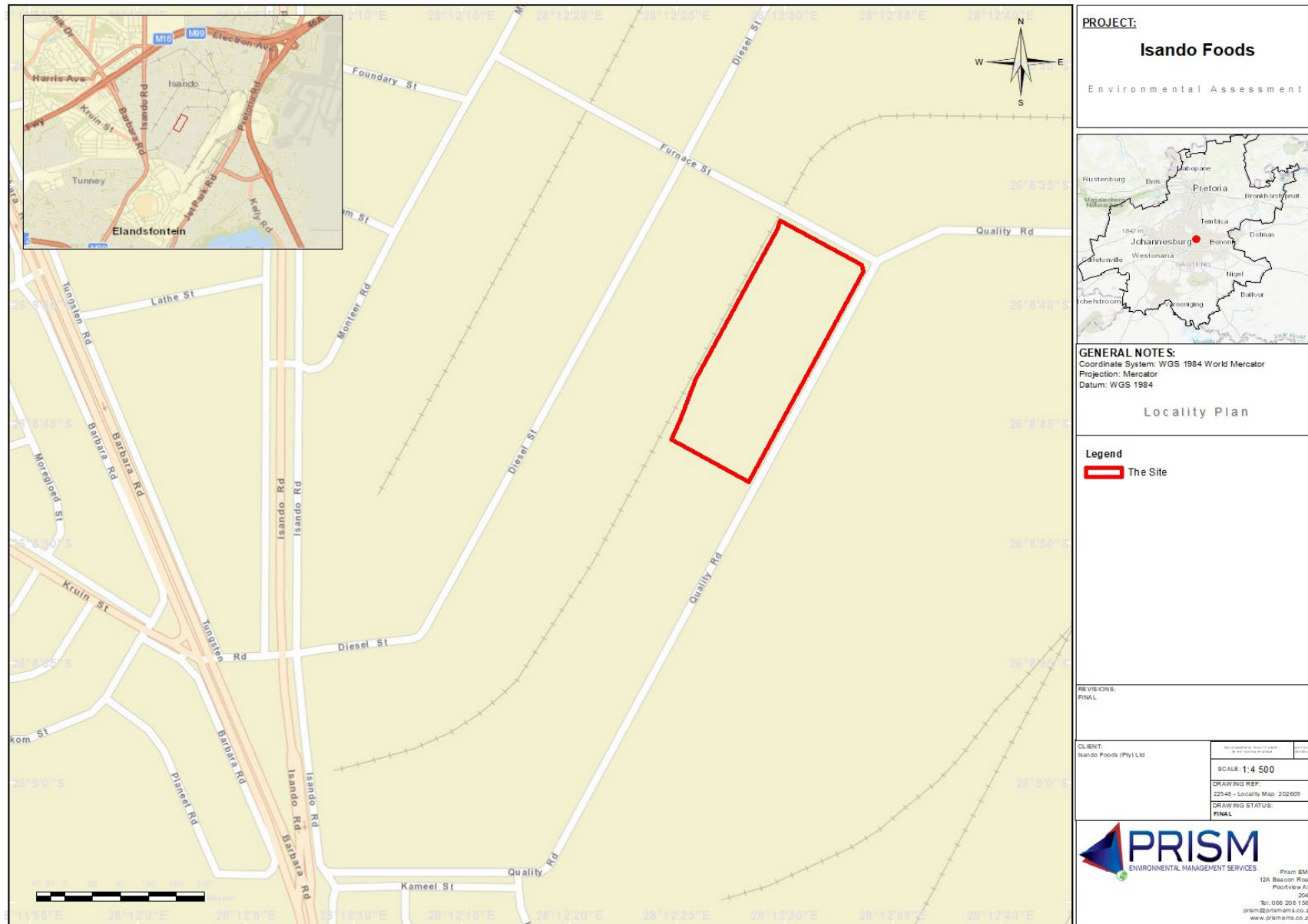


Figure 1-1: Locality Plan

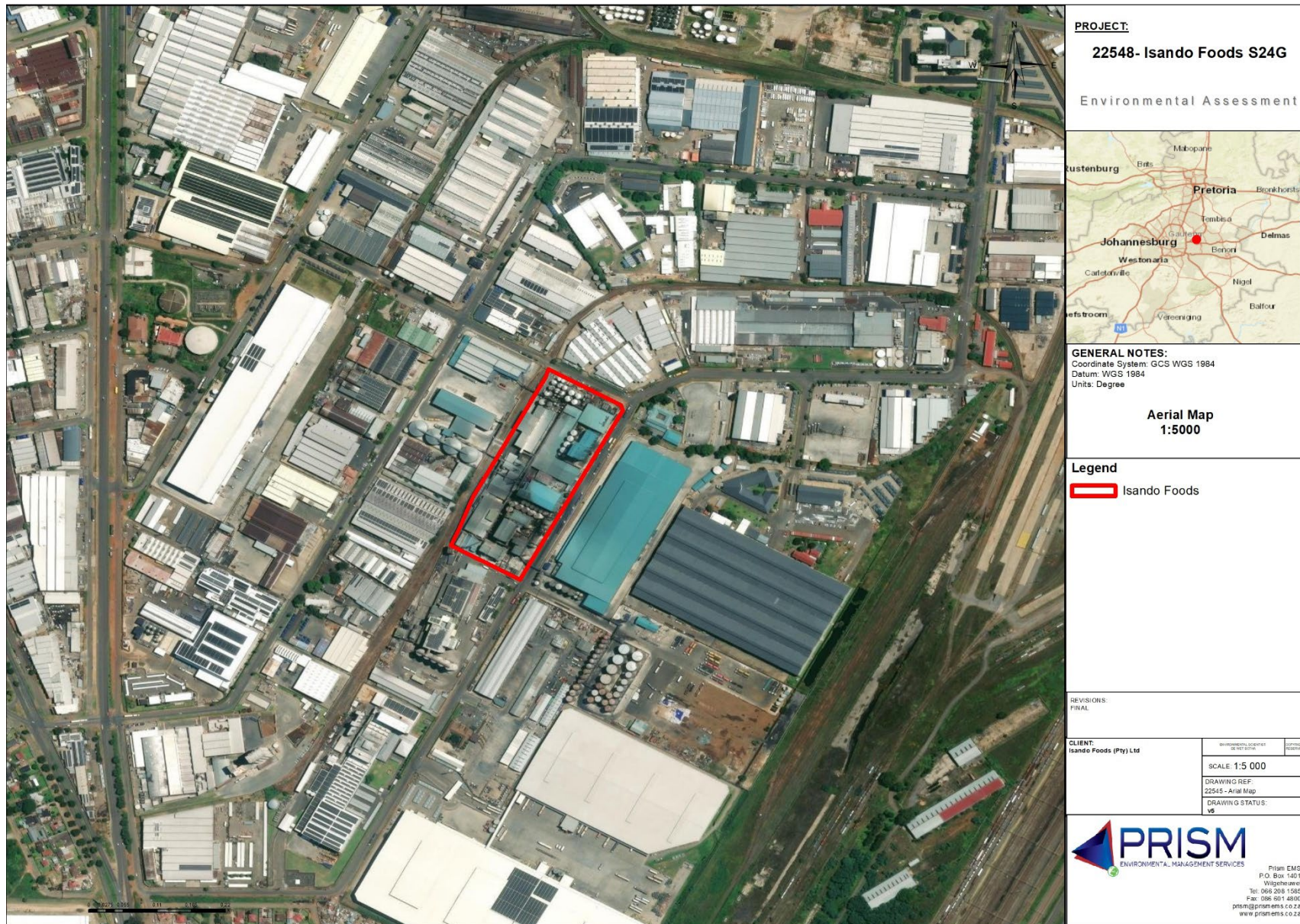


Figure 1-2: Aerial Locality Plan (1:5000)

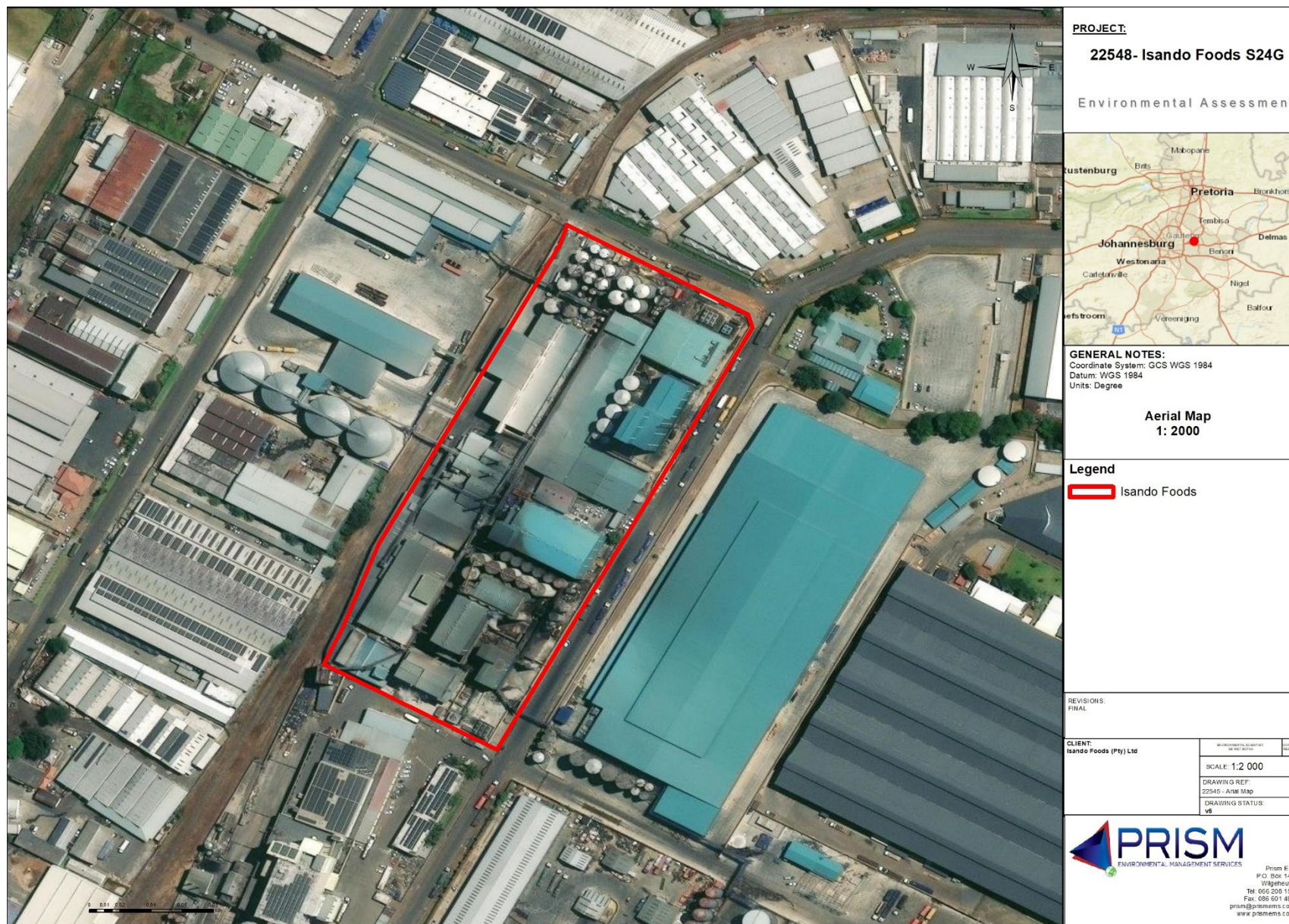


Figure 1-3: Aerial Locality Plan (1:2000)

### 1.3 AUTHORITIES

The following competent authorities are involved in the decision-making process for the proposed Section 24G Rectification Application:

- **Gauteng Department of Environment (GDEnv)**, as the Competent Authority responsible for processing and determining the Section 24G application in terms of:
  - Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998);
  - The Environmental Impact Assessment Regulations, 2014 (as amended) and
  - Listing Notice 1, Activity 51 (GN R983 of 2014, as amended), relating to the expansion and operation of facilities for the storage and handling of dangerous goods where the storage capacity is expanded by more than 80m<sup>3</sup>. GDEnv is responsible for evaluating the application, determining the applicable administrative fine and deciding whether retrospective Environmental Authorisation should be granted.
- **Ekurhuleni Metropolitan Municipality (EMM)**, as the local authority with jurisdiction over the project area. The Municipality has been consulted as a commenting authority during the Section 24G process and is required to review any applicable municipal infrastructure or service-related aspects of the application. In addition, a Stormwater Management Plan is required, and it must be submitted to the Municipality for review and approval.
- **Other Organs of State (where applicable)**. In accordance with the GDEnv Directive, any organ of state having jurisdiction over legislation applicable to the activity must be afforded the opportunity to comment on the application. Where no additional authorisations or approvals are required in terms of Specific Environmental Management Acts, this must be confirmed in writing by the Environmental Assessment Practitioner.

### 1.4 APPLICANT

The applicant is the entity that will assume responsibilities as the holder of the environmental authorisation if granted. Details of the applicant are contained in Table 1-1.

**Table 1-1: Details of the Applicant and Landowner**

|                        |                        |
|------------------------|------------------------|
| <b>Applicant:</b>      | Isando Foods (Pty) Ltd |
| <b>Contact Person:</b> | Mohammed Ferouze Moosa |

## 1.5 PROCESS TO DATE

### 1.5.1 PRE-APPLICATION PUBLIC PARTICIPATION

In terms of Regulation 8 of the Section 24G Fine Regulations<sup>1</sup>, 2017 and the requirements of the Gauteng Department of Environment (GDEnv), a pre-application public participation process was undertaken prior to the submission of the Section 24G Application. The purpose of this process was to notify Interested and Affected Parties (I&APs) of the intended rectification application and provide an opportunity to register and comment.

The Pre-Application Public Participation Process (PPP) consisted of the following:

- An Interested and Affected Party (I&AP) database was compiled comprising adjacent landowners, relevant authorities, the Ekurhuleni Metropolitan Municipality, Ward Councillor and other potential stakeholders.
- A Background Information Document (BID) describing the unlawful commencement of the dangerous goods storage facilities and the proposed Section 24G Rectification Application was prepared and made available to potential I&APs.
- A newspaper advertisement was published on 3 October 2025, notifying the public of the intended Section 24G application and inviting Interested and Affected Parties to register and submit comments.
- A site notice was erected at the property informing the public of the application and providing details of the registration and commenting process.
- Written notifications were distributed via email to identified I&APs and relevant authorities inviting them to register and participate in the process.
- An initial 20-day notification and registration period was provided, during which Interested and Affected Parties were afforded the opportunity to register and identify issues of concern.
- Extensive consultation with registered I&AP's were conducted as part of the pre-application PPP.
- A Comments and Responses Register was opened and maintained throughout the public participation process, and the I&AP database was updated as registrations and comments were received.

Following receipt of the Directive issued by GDEnv in terms of Section 24G(1) of NEMA, Prism Environmental Management Services undertook a further PPP as required by the Competent Authority. The Section 24G Rectification Report was made available to all registered I&APs for review from **16 September 2026 to 16 October 2026**, during which comments were invited and incorporated into the Comments and Responses Report. Copies of the application were also submitted to the Gauteng Department of Environment and the Ekurhuleni Metropolitan Municipality for review and comment.

---

<sup>1</sup> Regulations relating to the procedure to be followed and criteria to be considered when determining an appropriate fine in terms of Section 24G published in the Government Gazette on 20 July 2017, Gazette No 40994, No. R. 698

### 1.5.2 SECTION 24G APPLICATION

Isando Foods (Pty) Ltd commenced with the expansion and operation of dangerous goods storage facilities without obtaining the required the Gauteng Provincial Environmental Management Framework (GP EMF) Registration / Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended. The unlawful activity relates to the expansion of dangerous goods storage capacity through the installation of an underground 280m<sup>3</sup> hexane tank, increasing the total dangerous goods storage capacity on the property to approximately **461m<sup>3</sup>**. This activity triggered Activity 51 of Listing Notice 1 (GN R983 of 2014, as amended) and therefore required Environmental Authorisation prior to commencement.

The development is also considered in relation to the Gauteng Provincial Environmental Management Framework (GP EMF), which provides a spatial framework for guiding environmental management and sustainable development within Gauteng Province. The GP EMF was adopted through Government Notice 164 of 2018 (Government Gazette No. 41473 of 2 March 2018) and identified areas according to their environmental management and development objectives. The Isando Foods facility is located within an established industrial area and falls within the Industrial and Large Commercial Focus Zone (Zone 5) of the GP EMF. This zone provides industrial and large-scale commercial development in appropriate located areas, particularly areas that are already utilised for industrial or commercial purposes and have the necessary supporting infrastructure.

The location of the Isando Foods facility within the GP EMF Industrial and Large Commercial Focus Zone is considered in this Environmental Impact Report as a spatial and environmental planning consideration in assessing the compatibility of the dangerous goods storage expansion with the surrounding land-use context. The proposed continued operation of the storage infrastructure is associated with an existing industrial facility and does not represent the establishment of an industrial land use within an otherwise undeveloped or environmentally sensitive area. The GP EMF consideration is therefore particularly relevant to the assessment of the site's existing land-use context and the compatibility of the development with the broader environmental management objectives for the area.

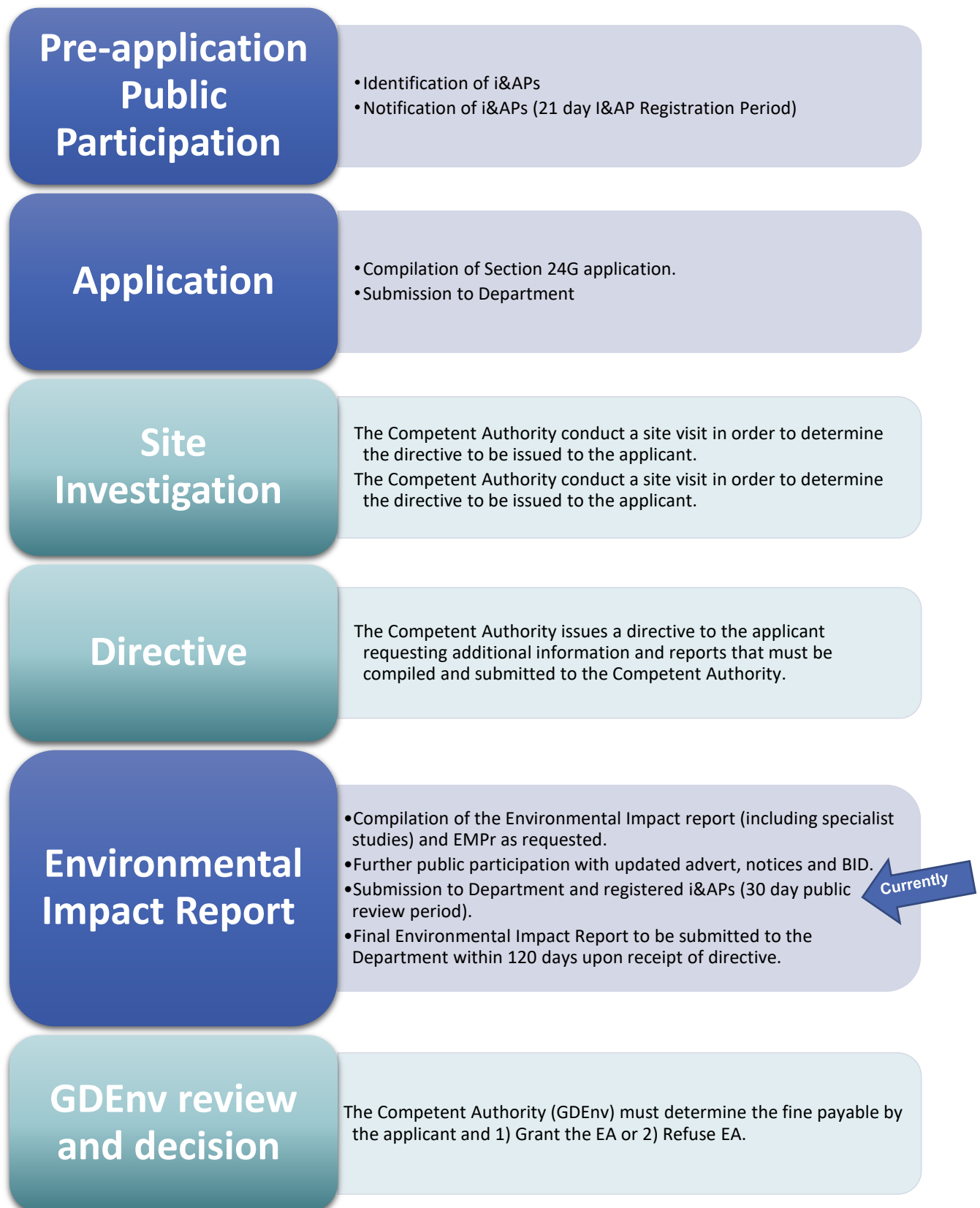
The GP EMF does not retrospectively authorise the unlawful commencement of a listed activity and does not replace the requirement for Environmental Authorisation in terms of NEMA. The Section 24G process therefore remains the mechanism through which the environmental consequences of the unlawful commencement are assessed and through which the Competent Authority determines whether retrospective Environmental Authorisation may be granted, subject to applicable conditions and requirements. Notwithstanding this, the GP EMF is considered relevant to the assessment of the activity and the determination of the appropriate administrative fine, as the Isando Foods facility is situated within GP EMF Zone 5, which is identified as an industrial and large commercial focus area. Furthermore, Activity 51 of the GP EMF Standard specifically provides environmental management specifications for dangerous-goods storage within Zone 5. The location of the activity within an established industrial area and a zone intended to accommodate industrial activities therefore provides important context when considering the environmental suitability of the activity, its potential impacts and the circumstances surrounding the unlawful

commencement. These factors, together with the implementation of appropriate mitigation measures, should be considered by the Competent Authority when determining the appropriate Section 24G administrative fine.

A Section 24G Application for the unlawful commencement and continuation of the listed activity was submitted by Prism, on behalf of Isando Foods (Pty) Ltd, to the Gauteng Department of Environment (GDEnv) on 28 January 2026. The application was allocated with the reference number **S24G/03/25-26/0726**.

Following the receipt of the application, GDEnv issued a Directive in terms of Section 24G(1) of NEMA, dated 25 June 2026, requiring the Applicant to undertake a comprehensive Environmental Impact Reporting process, further public participation, the preparation of an Environmental Management Programme (EMPr), supporting specialist studies where necessary and the submission of additional information to enable the Competent Authority to determine both the retrospective Environmental Authorisation application and the associated administrative fine.

This Final Environmental Impact Report (FEIR) has therefore been prepared in response to the requirements of the GDEnv Directive and forms part of the documentation required to support the Section 24G Rectification Application. The FEIR considers the environmental consequences associated with the historical unlawful commencement of the listed activity, the ongoing operation of the dangerous goods storage facilities, the site's spatial and environmental context, including the GP EMF and the mitigation and management measures required to avoid, minimise, manage and where applicable, rehabilitate identified environmental impacts.



**Figure 1-4: Section 24G process**

A summary of the process to date is provided in the subsections that follow.

### 1.5.3 FURTHER PUBLIC PARTICIPATION

In accordance with the Directive issued by the Gauteng Department of Environment (GDEnv) in terms of Section 24G(1) of the National Environmental Management Act (NEMA), a further public participation process was undertaken to comply with the Environmental Impact Assessment Regulations, 2014 (as amended) and the specific requirements of the Competent Authority.

The further public participation process includes the following:

- A newspaper advertisement was published in the Star Newspaper on 16 September 2026, notifying the public of the Section 24G Rectification Application and inviting interested parties to review the application documentation and impact report, and submit comments.
- A site notice was erected at the property in accordance with the GDEnv Directive. The notice described the unlawful commencement of the listed activity, identified the applicable listed activity, provided details of the Section 24G application and informed the public of the review period and the procedure for submitting comments.
- Written notifications were distributed electronically to adjacent landowners, registered Interested and Affected Parties, relevant organs of state and the Ekurhuleni Metropolitan Municipality, advising them of the availability of the Section 24G Rectification Report for review.
- The Interested and Affected Party (I&AP) database was updated throughout the process to include all newly registered stakeholders.
- The Comments and Responses Register was updated to include all comments received during the review period, together with the corresponding responses prepared by the Environmental Assessment Practitioner.

All comments received during the notification and review periods will be incorporated into the Comments and Responses Report, which accompanies the final Section 24G Rectification Application to be submitted to the Gauteng Department of Environment.

### 1.5.4 PUBLIC REVIEW OF THE ENVIRONMENTAL IMPACT REPORT

Following completion of the Environmental Impact Report (EIR), registered Interested and Affected Parties were notified of the availability of the report for public review in accordance with the requirements of the GDEnv Directive and the Environmental Impact Assessment Regulations, 2014 (as amended).

Notification of the public review process included the following:

- Registered Interested and Affected Parties were notified via email on 16 September 2026 that the Section 24G Rectification Report is available for public review.
- Electronic copies of the report and supporting documentation were made available to Interested and Affected Parties upon request.
- Copies of the Section 24G Rectification Application were submitted to the Gauteng Department of Environment (GDEnv) and the Ekurhuleni Metropolitan Municipality as the principal reviewing authorities.

- A 30-day public review period was provided from 16 September 2026 to 16 October 2026, during which Interested and Affected Parties were afforded the opportunity to review the report and submit written comments.

All comments received during the public review period, together with the Environmental Assessment Practitioner's responses, will be documented in the Comments and Responses Report and will accompany the final submission of the Section 24G Rectification Application to the Gauteng Department of Environment.

## 1.6 EIA REPORT REQUIREMENTS AND OUTLINE

### 1.6.1 GDEnv REQUIREMENTS FOR THE EIA REPORT

In addition to the application form, GDEnv may request an Environmental Impact Report with Scientific Reports. The table below provide a summary of these comments and requirements, as well as where they have been addressed in the report (Table 1-2).

**Table 1-2: GDEnv requirements for the Environmental Impact Report**

| Item | Directive – 25 June 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Report Ref                              | Comment                                                                                                                |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| 1.   | <b>Detailed description of all activities undertaken on site including:</b> <ul style="list-style-type: none"> <li>• Detailed history of the site and its use prior to the current activity being undertaken on site with a detailed description of the historical changes noticed in relation to the biomes and land use/landcover.</li> <li>• Detailed description of all existing structures and/or infrastructure.</li> <li>• Confirmation of the size of the area that has been transformed, specifically around the watercourse and warehouse area in relation to the size of the whole area.</li> <li>• Discussion on any other permits obtained, or in the process of being obtained.</li> <li>• A4 colour photographs of all relevant sections of the site.</li> </ul> | Chapter 1<br>Chapter 4<br>Appendix 13.4 | A detailed project description is included in Chapter 4 of the EIA Report. A Photo report is included in Appendix 13.4 |
| 2.   | <b>Site layout plan</b> <ul style="list-style-type: none"> <li>• A site layout plan clearly outlining the location and physical footprint of every structure (developed) on site, in relation to the site and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Appendix 13.3                           | The layout plan along with the sensitivity maps is included in Appendix 13.3.                                          |

| Item | Directive – 25 June 2026                                                                                                                                                                                                                                                                                                                                    | Report Ref                                           | Comment                                                                                                                                                                                                                                                                                                                                                                                |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | all sensitive environmental features within a 500m radius from the site.                                                                                                                                                                                                                                                                                    |                                                      |                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.   | <b>Description of the receiving environment</b> <ul style="list-style-type: none"> <li>A description of the environment that has been affected by the activity and the manner in which the physical, biological, social, economic and cultural aspects have been and may further be affected by the activity.</li> </ul>                                    | Chapter 4<br>Chapter 5<br>Chapter 9<br>Chapter 11.1. | <p>A detailed desktop assessment of the receiving environment is included in Chapter 4. This was utilised to identify potential impacts. As such, Chapter 9 includes a summary of the technical reports that have been included.</p> <p>In addition, a composite sensitivity map is included in Chapter 11.1. and provides an overview of the actual surrounding area sensitivity.</p> |
| 4.   | <b>Impact Assessment</b> <ul style="list-style-type: none"> <li>Description of all impacts associated with the activity commenced with on the site as well as the assessment of the nature, extent, duration, impact and significance of the consequences for or impacts on the environment of each of the activities unlawfully commenced with.</li> </ul> | Chapter 10                                           | Refer to Chapter 10 for the detailed Impact Assessment.                                                                                                                                                                                                                                                                                                                                |
| 5.   | <b>Specialist studies</b> <ul style="list-style-type: none"> <li>A detailed Storm Water Management Plan (SWMP) for the site, taking into consideration the watercourse on site, must be prepared by a qualified engineer.</li> <li>EMPr</li> <li>A Waste Management Plan</li> <li>An Emergency Response Plan</li> </ul>                                     | Chapter 9<br>Appendix 13.6                           | <p>Chapter 9 includes a summary of the technical studies &amp; Management Plans:</p> <ul style="list-style-type: none"> <li>Stormwater Management Plan;</li> <li>EMPr;</li> <li>Waste Management Plan; and</li> <li>Emergency Response Plan (Crisis Management Procedure)</li> </ul> <p>All reports are included under cover of Appendix 13.6.</p>                                     |
| 6.   | <b>Social Responsibility</b> <ul style="list-style-type: none"> <li>Provide information on how the local community has benefited/will benefit further from the development, including any social responsibility programmes that will be undertaken by the applicant.</li> </ul>                                                                             | Chapter 7                                            | Chapter 7 includes a summary of the impacts of the development on the local community.                                                                                                                                                                                                                                                                                                 |
| 7.   | <b>Public Participation Process</b> <ul style="list-style-type: none"> <li>Attached Public participation process is noted by the Department; however, public participation process must be conducted in</li> </ul>                                                                                                                                          | Appendix 13.5                                        | Appendix 13.5 includes the proof of notification for both the initial/preliminary notification and notification of the review of the EIR.                                                                                                                                                                                                                                              |

| Item | Directive – 25 June 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Report Ref      | Comment                                                                                                                                                                                                     |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | terms of chapter 6 of EIA regulations, 2014 (as amended). Should you be unable to submit comments, proof that attempts were made to obtain comments must also be attached.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 | Proof of the notification and public review of the EIA Report will be included in the final report.                                                                                                         |
| 8.   | <b>Operational Environmental Management Programme (EMPr)</b> <ul style="list-style-type: none"> <li>Identification of all the possible environmental impacts that occurred during the construction of the activity and those that may occur during the operation of the activity.</li> <li>Information on all mitigation measures undertaken, or that will be taken to address the environmental impacts that have been identified in the EIR, including environmental impacts or objectives in respect of – <ul style="list-style-type: none"> <li>i) operation or undertaking of the activity,</li> <li>ii) maintenance of the structures on site,</li> <li>iii) rehabilitation plan of the environment and,</li> <li>iv) closure.</li> </ul> </li> <li>Proposed mechanisms and frequency for monitoring compliance with, and performance assessment against the EMPr, and reporting thereon.</li> </ul> | Appendix 13.7   | Appendix 13.7 provides the full EMPr as per the requirements of Appendix 4 of the EIA Regulations, 2014 (as amended). The mitigation measures provided in the EMPr relate directly to the impact assessment |
| 9.   | <b>Emergency Response Plan (ERP)</b> <ul style="list-style-type: none"> <li>Emergency response plan for the activity on the management of any incident that may occur as a result of the activity. The ERP must – <ul style="list-style-type: none"> <li>a) highlight possible emergency situations/incidents that could arise on the site,</li> <li>b) recommend appropriate responses to the identified emergency situations/incidents and,</li> <li>c) provide details of emergency evacuation procedures and relevant emergency contact detail.</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                 | Appendix 13.6.1 | An ERP is included in Appendix 13.6.1                                                                                                                                                                       |
| 10.  | <b>Sworn Affidavits</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Appendix 13.2.3 | The Sworn Affidavits of the EAP and Applicant is included in Appendix 13.2.3.                                                                                                                               |

## 1.6.2 PUBLIC NOTIFICATION AND PUBLIC REVIEW OF THE EIA REPORT

The EIA Report (*this document*) has been compiled in line with the S24G directive issued by GDEnv on 25 June 2026.

In order to ensure that all I&APs had the opportunity to review and comment on the EIA Report, all registered I&APs (as identified as part of the process described in Section 1.5.3. above) have been notified of the public review of the EIA Report.

The review period provided for review and comment is between **16 September 2026 and 16 October 2026.**

As part of this review, electronic copies of the report are made available to all registered Interested and Affected Parties (I&APS). All relevant Organs of State will receive an electronic copy for review.

All comments received during this period will be added to the Comments and Responses Report and submitted to GDEnv as part of the final submission.

## 2 ENVIRONMENTAL ASSESSMENT PRACTITIONER

Prism EMS have been appointed to undertake the required Environmental process in terms of the required Environmental Impact Assessment (EIA) Regulations. Details and expertise of the Environmental Assessment Practitioner (EAP) who prepared the EIA Report is provided in Table 2-1 and Curriculum Vitae and Company Profile is appended in Appendix 13.1.

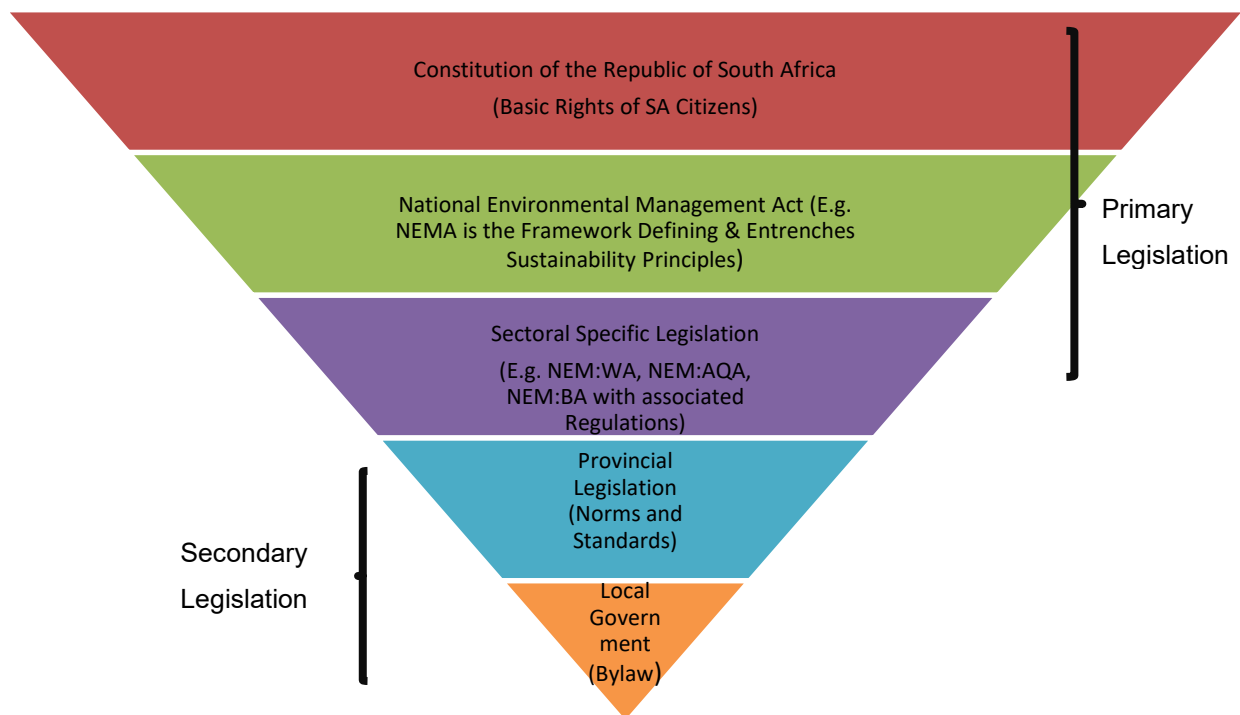
**Table 2-1: Details of the EAP**

| Prism EMS Team               |                                                                |                                                                                            |
|------------------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Contact Details              | Post: 12A Beacon Road<br>Poortview AH, 2040                    | Tel: 066 208 1585<br>Email: <a href="mailto:prism@prismems.co.za">prism@prismems.co.za</a> |
| Assessor:                    | De Wet Botha                                                   |                                                                                            |
| Company:                     | Prism Environmental Management Services                        |                                                                                            |
| Qualifications:              | MA. Environmental Management (PHED)                            |                                                                                            |
| Experience:                  | 23+ years                                                      |                                                                                            |
| Affiliation/<br>Registration | Pr.Sci.Nat. (119979), Reg. EAP (2019/1209)                     |                                                                                            |
| Email:                       | <a href="mailto:dewet@prismems.co.za">dewet@prismems.co.za</a> |                                                                                            |

| Designation | Name          | Qualification                             | Professional Registration                                                                                                                                                                                                                                                                                 | Role                |
|-------------|---------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Cand. EAP   | Brett Collett | BSc (Hons)<br>Environmental<br>Management | Environmental Assessment<br>Practitioners Association of South<br>Africa (EAPASA   Cand. EAP<br>(2025/20560)<br>Member of the International<br>Association for Impact Assessors<br>(IAIAsa) (2916561)<br>South African Council for Natural<br>Scientific Professions (SACNASP)  <br>Cand.Sci.Nat (181127) | Cand. EAP in assist |

### 3 LEGISLATIVE FRAMEWORK

This section aims to provide an overview of key policy, legislation, plans, guidelines and municipal development planning frameworks triggered by the project. The requirements set out in these Act's and Regulations will be adhered to through the Section 24G Rectification Process and Environmental Impact Reporting process.



**Figure 3-1: South African Environmental Legislation Hierarchy.**

The following Acts, Regulations, By-Laws and Guidelines are applicable to the development.

#### 3.1 CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA

Isando Foods (Pty) Ltd will be required to adhere to the Environmental Management Programme (EMPr) requirements to ensure that social and environmental management considerations are considered and implemented. As per Section 25 the Constitution, a public participation process (PPP) was and will continue to be undertaken, as this is an essential mechanism for informing stakeholders of their rights and obligations in terms of the project. Section 24 of the Constitution states that –

*“Everyone has the right to -*

- a) an environment that is not harmful to their health or well-being; and*
- b) 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 promoting justifiable economic and social development.”*

To ensure that the continued operation of the dangerous goods storage facility is sustainable, an Environmental Impact Report (EIR) process is in process to identify impacts related to the operation and mitigation measures, where possible.

### **3.2 NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA), 1998 (ACT NO. 107 OF 1998)**

The NEMA is the umbrella framework for all environmental legislation primarily to assist with implementing the environmental rights of the Constitution (refer to Chapter 3.1). The NEMA provides fundamental principles required for environmental decision making and to achieve sustainable development. It also makes provision for duty of care to prevent, control and rehabilitate the effects of significant pollution and environmental degradation and prosecute environmental crimes. These principles must be adhered to and taken into consideration during the impact assessment phase.

NEMA defines “environment” as –

*“the surroundings within which humans exist and that are made up of –*

- (i) the land, water and atmosphere of the earth;*
- (ii) micro-organisms, plants and animal life;*
- (iii) any part or combination of (i) or (ii) and the interrelationship among and between them; and*
- (iv) the physical, chemical, aesthetic and cultural, properties and conditions of the foregoing that influence human health and well-being.”*

Section 24D and 24(2) of the NEMA makes provision for the publication of list and associated regulations containing activities identified that may not commence without obtaining prior environmental authorisation from the competent authority. These regulations are referred to as the EIA Regulations and are interpreted hand in hand with the various listed activities discussed further below. Environmental Authorisation was not obtained prior to the expansion and operation of facilities for the storage and handling of dangerous goods at the Isando Foods manufacturing facility. Consequently, the applicant is undertaking a rectification process in terms of Section 24G of NEMA.

#### **3.2.1 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (GN R 982 OF 4 DECEMBER 2014, AS AMENDED)**

The EIA regulations were promulgated in terms of Section 24 of the NEMA, for the purpose of providing methodologies and specific requirements for the undertaking of an EIA. The Regulations stipulate that any proposed activity listed in the associated notices must undertake either a Basic Assessment (BA) or Scoping & Environmental Impact Report (S&EIR) in order to obtain an environmental authorisation (if granted) by the competent authority before the commencement of the specified listed activity.

The EIA Regulations provide the minimum requirements for appointing an Environmental Assessment Practitioner (EAP) and for undertaking the relevant Public Participation Process (PPP) as required. They also detail the contents of the impact assessment reports and all other aspects associated with BA and/or EIAs.

The following listed activities have been identified in terms of the relevant Government Notices:

#### **3.2.1.1 Listing Notice 1: GN R 983 of 4 December 2014**

- **Activity 51** - The expansion and related operation of facilities for the storage, or storage and handling, of a dangerous good, where the capacity of such storage facility will be expanded by more than 80 cubic metres.

As the above activity has already commenced and is operational, Registration/Environmental Authorisation is applied for by means of conducting a Section 24G Environmental Authorisation application process in accordance with GNR982, of 2014 (as amended).

Please refer to Chapter 5.2 which provides a more detailed assessed of why this activity is triggered.

#### **3.2.1.2 Listing Notice 2: GN R 984 of 4 December 2014**

No activities as listed in Listing Notice 2 are applicable to the application.

#### **3.2.1.3 Listing Notice 3: GN R 985 of 4 December 2014**

No activities as listed in Listing Notice 3 are applicable to the application.

#### **3.2.2 GN 164 OF 2 MARCH 2018 | ADOPTION OF THE GAUTENG PROVINCIAL ENVIRONMENTAL FRAMEWORK STANDARD AND EXCLUSION OF ASSOCIATED ACTIVITIES FROM THE REQUIREMENT TO OBTAIN ENVIRONMENTAL AUTHORISATION IN TERMS OF SECTION 24(2)(D) AND 24(10)(A) READ IN CONJUNCTION WITH SECTION 24(1)(D) OF NEMA, 1998 FOR THE IMPLEMENTATION OF THE GAUTENG PROVINCIAL ENVIRONMENTAL MANAGEMENT FRAMEWORK**

The Gauteng Provincial Environmental Management Framework (GPEMF) was consulted, and the development footprint does fall within Zone 5 – Industrial and large commercial focus zone. The development occurs within an existing industrial area and the GPEMF was considered during the evaluation of the Section 24G application. As the application is in terms of S24G, a registration in terms of the GPEMF Standard, 2021 is not applicable, but must be considered as part of the evaluation.

In terms of the GPEMF, 2019, the Isando Foods site is situated in Zone 5, and the subject activities (the expansion of facilities for the storage of a dangerous good by more than 80m<sup>3</sup>), is **excluded** from the requirement to apply for Environmental Authorisation. It is thus important to note that activities have not proceeded as 'illegal' activities, but rather 'unregistered' activities.

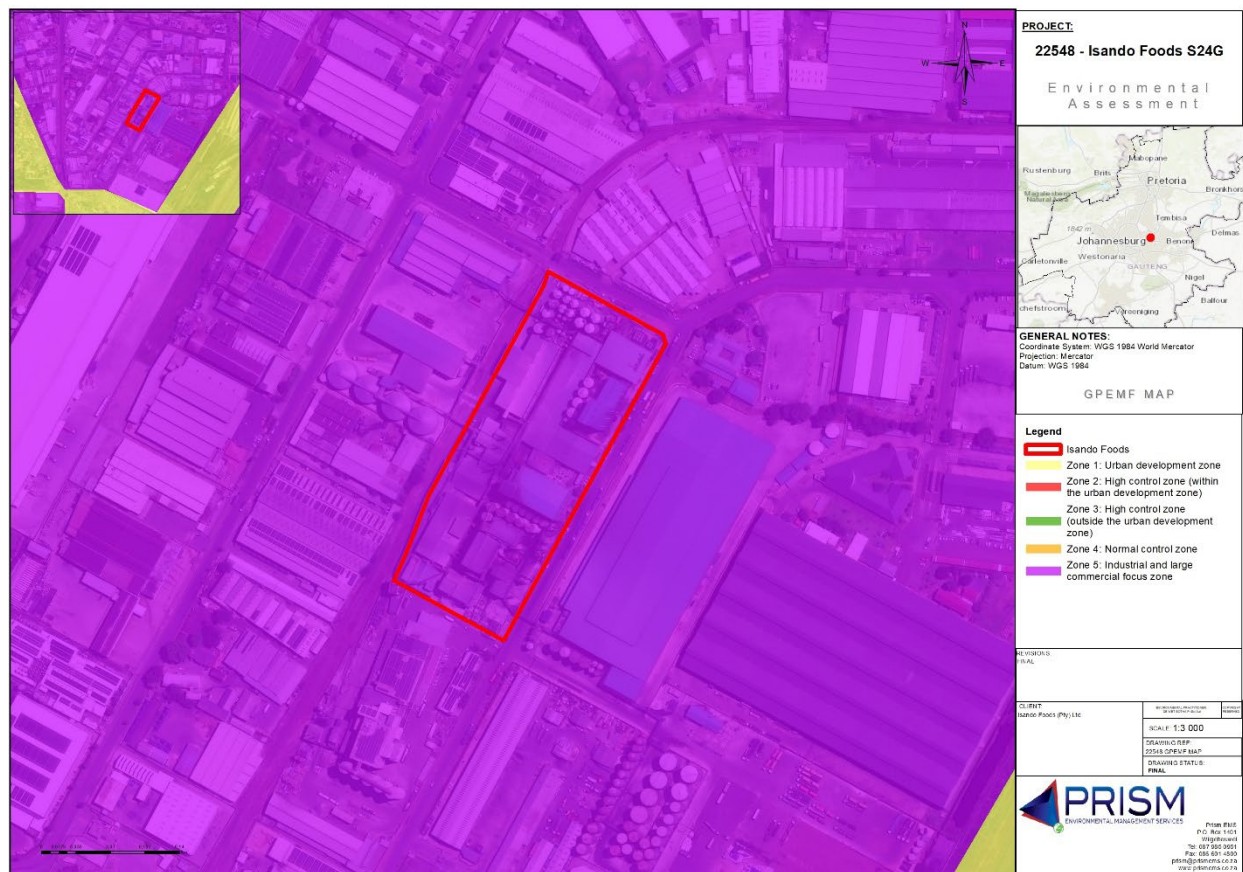


Figure 3-2: Gauteng Province Environmental Management Framework Map

### 3.2.3 GN 960 OF 5 JULY 2019 | NOTICE OF THE REQUIREMENTS TO SUBMIT A REPORT GENERATED BY THE NATIONAL WEB BASED ENVIRONMENTAL SCREENING TOOL IN TERMS OF SECTION 24(5)(H) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 AND REGULATION 18(1)(B)(V) OF THE EIA REGULATIONS, 2014 (AS AMENDED)

As per the requirements of GN 960 of 5 July 2019, a report was generated on the National Screening tool and is submitted in Appendix 13.9.

### 3.2.4 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 (GN 320 OF 20 MARCH 2020) AND GN 1150 OF 30 OCTOBER 2020

The Gauteng Department of Environment (GDEnv) has published a number of protocols for the specialist assessment and minimum report requirements including aspects such as agriculture, noise, terrestrial- and aquatic biodiversity.

GDEnv has also published general requirements for site sensitivity verification (GN 320 of 20 March 2020). This notes that a site sensitivity verification can be undertaken by an environmental assessment practitioner (EAP) or a specialist and should utilize the following methodology:

- A desktop analysis, using satellite imagery;
- A preliminary on-site inspection; and
- Any other available and relevant information.

Further, the outcome of the site sensitivity verification must be recorded in a report that:

- Confirms or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;
- Contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and
- Is submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations<sup>1</sup> (EIA Regulations).

A copy of the National Screening Tool is included in Appendix 13.9. As this document is to comply with a Section 24(G) directive for the development of dangerous goods storage facilities at Isando Foods, 21 Quality Rd, Isando, the reports required as per the directive have been compiled and are submitted along with this report.

### **3.3 NATIONAL HERITAGE RESOURCE ACT (NHRA), 1999 (ACT NO. 25 OF 1999)**

The NHRA provides for the protection and management of South Africa's heritage resources. The South African National Heritage Resources Agency (SAHRA) is the administering authority in regard to all matters relating to heritage resources. A heritage resource refers to any historically important feature such as graves, trees, archaeology, culturally significant symbols, spaces, landscapes and fossil beds as protected heritage resources. In terms of Section 38 of the NHRA, SAHRA can call for a Heritage Impact Assessment (HIA) for certain categories of development. The NHRA also makes provision for the assessment of heritage impacts as part of an EIA process and indicates that if such an assessment is deemed adequate, a separate HIA is not required.

### **3.4 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (NEM:BA), 2004 (ACT NO. 10 OF 2004)**

The NEM:BA aims to provide for the management and conservation of South Africa's biodiversity within the framework of the NEMA. The purpose of the NEM:BA is to protect ecosystems and the species within as well as the promoting of sustainable use of indigenous biodiversity. During any environmental authorisation process the following regulations are considered and researched if at any stage the following regulations are applicable:

- Alien and Invasive Species Regulations;
- Alien and Invasive Species List;
- Lists of Critically Endangered, Vulnerable and Protected Species; and
- Threatened or Protected Species Regulations.

The Isando Foods (Pty) Ltd site is already greatly transformed and located within an existing industrial area. Most of the natural ground cover has been replaced with compacted, impermeable surfaces. No significant biodiversity impacts are expected, but biodiversity considerations have nevertheless been evaluated through the Section 24G process.

### **3.5 NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE MANAGEMENT ACT (NEM:WA), 2008 (ACT NO. 59 OF 2008)**

The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM:WA) provides the legislative framework for integrated waste management in South Africa. The Act aims to protect health and the environment by promoting waste minimisation, reuse, recycling and recovery, while ensuring that waste is managed in a manner that prevents pollution and ecological degradation. It also provides for the licensing and regulation of listed waste management activities.

The Isando Foods (Pty) Ltd facility is an existing vegetable oil manufacturing plant where dangerous goods, including hexane, diesel, caustic substances and other process chemicals, are stored and handled as part of normal operations. The Section 24G application relates to the unlawful expansion and operation of dangerous goods storage facilities and does not include any listed waste management activities requiring a Waste Management Licence in terms of NEM:WA.

Waste generated during the operation of the facility consists primarily of general industrial waste, domestic waste, used absorbent materials, empty chemical containers, waste oils, contaminated personal protective equipment (PPE), and other hazardous waste associated with the storage and handling of dangerous goods. General waste is separated and disposed of through the Ekurhuleni Metropolitan Municipality or other authorised waste service providers, while hazardous waste is temporarily stored in designated areas and removed by appropriately licensed hazardous waste contractors for treatment and disposal at licensed waste management facilities.

In accordance with the duty of care provisions contained in NEM:WA, Isando Foods (Pty) Ltd implements waste management measures to minimise waste generation, prevent contamination of soil and groundwater, and ensure that all waste is stored, transported and disposed of in accordance with applicable legislation and recognised industry best practice. Spill response procedures, bunded storage areas, and housekeeping measures further reduce the risk of environmental pollution associated with the storage and handling of dangerous goods.

The proposed Section 24G Rectification Application does not require a Waste Management Licence or registration under the National Environmental Management: Waste Act, as no listed waste management activities are proposed or undertaken as part of the unlawful activity being rectified.

### **3.6 OCCUPATIONAL HEALTH AND SAFETY ACT, 1993 (ACT NO. 85 OF 1993)**

The Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) (OHSA) provides the legislative framework for ensuring the health and safety of employees and any persons who may be affected by workplace activities. The Act places a legal duty on employers to provide and maintain a working environment that is safe and without risk to the health of employees and members of the public.

Given that the Isando Foods facility stores and handles dangerous goods, including hexane, diesel and other hazardous chemicals, compliance with the OHSA is an important component of the facility's ongoing operation. The Act requires that hazards associated with the storage, handling and use of hazardous chemical agents be identified, assessed and appropriately controlled through engineering controls, administrative measures and the use of suitable personal protective equipment.

Particular relevance is placed on the Hazardous Chemical Agents Regulations, 2021, promulgated under the Occupational Health and Safety Act. These Regulations prescribe minimum requirements for:

- the identification and assessment of hazardous chemical risks;
- safe storage and handling of hazardous chemical agents;
- provision and maintenance of Safety Data Sheets (SDSs);
- employee training and awareness;
- emergency preparedness and spill response;
- exposure monitoring where required;
- appropriate labelling and signage; and
- the implementation of suitable control measures to minimise occupational exposure.

The dangerous goods storage facilities at the Isando Foods manufacturing plant are required to comply with these Regulations through the implementation of appropriate operational procedures, spill prevention measures, fire protection systems, emergency response plans and routine maintenance of storage infrastructure.

### **3.7 NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004 (ACT NO. 39 OF 2004)**

The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEM:AQA) provides the legislative framework for protecting and enhancing air quality in South Africa to prevent air pollution and minimise impacts on human health and the environment.

The Isando Foods facility operates an existing edible oil manufacturing plant where volatile and combustible substances, including hexane, are stored and handled as part of the manufacturing process. Although the Section 24G Rectification Application relates specifically to the expansion of storage of dangerous goods and not the establishment of a new industrial process, the storage and handling of volatile substances have the potential to result in fugitive emissions if not appropriately managed.

Accordingly, the facility must implement appropriate operational and maintenance measures to minimise fugitive emissions through:

- routine inspection and maintenance of storage tanks, valves, pipework and associated infrastructure;
- implementation of leak detection and repair programmes where applicable;
- maintenance of appropriate ventilation systems;
- emergency spill response procedures; and
- compliance with any applicable Atmospheric Emission Licence requirements should listed activities be undertaken.

The continued operation of the dangerous goods storage facilities should therefore be managed in a manner that prevents or minimises adverse impacts on ambient air quality and neighbouring land uses.

### **3.8 NATIONAL BUILDING REGULATIONS AND BUILDING STANDARDS ACT, 1977 (ACT NO. 103 OF 1977)**

The National Building Regulations and Building Standards Act, 1977 (Act No. 103 of 1977) establishes the legislative framework for the design, construction and maintenance of buildings and associated structures to ensure public safety, structural integrity and compliance with applicable building standards.

The dangerous goods storage facilities at the Isando Foods manufacturing plant comprise storage tanks, associated pipework, bunded containment areas and ancillary infrastructure that form part of the existing industrial facility. Such infrastructure must comply with applicable building regulations, municipal building requirements and recognised engineering standards applicable to the storage of hazardous substances.

Compliance with the National Building Regulations assists in ensuring that storage infrastructure is designed and maintained to minimise the risk of structural failure, fire, explosion and environmental contamination. Appropriate design measures include secondary containment, fire separation distances, access for emergency services, stormwater management and the safe installation of associated engineering services.

### **3.9 NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996)**

The National Road Traffic Act, 1996 (Act No. 93 of 1996) regulates the transportation of goods on public roads, including the transportation of dangerous goods. The Act, together with the National Road Traffic Regulations, prescribes requirements for the packaging, labelling, documentation, vehicle specifications and safe transport of dangerous goods.

The Isando Foods facility receives and dispatches dangerous goods, including hexane and diesel, as part of its normal manufacturing operations. Transport of these substances must therefore comply with the

requirements of the National Road Traffic Act and associated regulations governing the transport of dangerous goods.

Compliance includes, where applicable:

- the use of appropriately licensed transport operators;
- transport in vehicles suitable for dangerous goods;
- appropriate placarding and labelling of vehicles;
- provision of emergency information and documentation;
- driver competency and dangerous goods training; and
- implementation of emergency response procedures in the event of an accident or spill during transport.

Compliance with these requirements reduces risks to public safety, road users and the surrounding environment during the transport of dangerous goods to and from the facility.

### **3.10 PROTECTION OF PERSONAL INFORMATION ACT, 2013**

The Protection of Personal Information (POPI) Act, 2013 (Act No. 4 of 2013), aims to promote the protection to personal information processed by public and private bodies. Section 14 of the Constitution of the Republic of South Africa, 1996, provides that everyone has the right to privacy, this includes the right to protection of personal information.

The purpose of the POPI Act is to –

- (a) Give effect to the constitutional right to privacy, by safeguarding personal information when processed by a responsible party, subject to justifiable limitations that are aimed at -
  - (i) Balancing the right to privacy against other rights, particularly the right of access to information; and
  - (ii) Protecting important interests, including the free flow of information within the Republic and across international borders,
- (b) Regulate the manner in which personal information may be processed, by establishing conditions, in harmony with international standards, that prescribe the minimum threshold requirements for the lawful processing of personal information
- (c) Provide persons with rights and remedies to protect their personal information from processing that is not in accordance with this Act,
- (d) Establish voluntary and compulsory measures, including the establishment of an Information Regulator, to ensure respect for and to promote, enforce and fulfil the rights protected by this Act.

The POPI Act aims to ensure that personal information is processed by public and private bodies in a manner that gives effect to the right to privacy. Personal information, as defined by the Act is inclusive of:

- a) Information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person,

- b) Information relating to the education or the medical, financial, criminal or employment history of the person,
- c) Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person,
- d) The biometric information of the person,
- e) The personal opinions, views or preferences of the person,
- f) Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence,
- g) The views or opinions of another individual about the person,
- h) The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Consent is defined by the act as follows: any voluntary, specific and information expression of will in terms of which permission is given for the processing of personal information.

This Public Participation Process has been carried out in line with the POPI Act. Personal Information collected by Prism EMS will not be made available to the public or Authorities unless consent is given by registered I&APs.

### **3.11 OTHER LEGISLATION AND GUIDELINES**

In addition to the above, the following national, provincial and municipal guidelines, plans and by-laws have been taken into account:

#### **3.11.1 NATIONAL GUIDELINES AND PLANS**

The following national plans and guidelines were reviewed and taken into account where necessary. More detail is provided in the subsections below.

##### **3.11.1.1 DEA, 2014 – IEMS Guideline series**

The following guidelines have been adopted by the applicant in the pursuit of best practice and sustainable development and are considered in the management measures and mitigation of impacts identified.

- Department of Environment Integrated Environmental Management Guideline Series: Guideline on Need and Desirability;
- Department of Environment Integrated Environmental Management Guideline Series. (Guideline 7);
- Public Participation in the Environmental Impact Assessment Process; and
- Guidelines on Alternatives.

#### **3.11.2 PROVINCIAL GUIDELINES AND PLANS**

In addition to the above, the following provincial guidelines and plans have been taken into account:

### 3.11.2.1 The Gauteng Spatial Development Framework, 2011

The Gauteng Spatial Development Framework, 2011 was among others, compiled to specify a clear set of spatial objectives for municipalities to achieve to ensure realisation of the future provincial spatial infrastructure; and to enable and direct growth.

The SDF aims to articulate the spatial objectives of the Gauteng Spatial Development Framework (SDF). The Gauteng Spatial Development Framework 2030 and the Gauteng Spatial Development Framework, 2011 was compiled to specify a clear set of spatial objectives for municipalities to achieve to ensure realisation of the future provincial spatial infrastructure; and to enable and direct growth.

The SDF aims to articulate the spatial objectives of the Gauteng region to assist the alignment of neighbouring municipalities' spatial plans.

### 3.11.2.2 The Gauteng Provincial Environmental Management Framework (GPEMF) and Adoption of the Gauteng Provincial Environmental Framework Standard and Exclusion of Associated Activities from the requirement to obtain environmental authorisation in terms of Section 24(2)(d) and 24(10)(a) Read in conjunction with Section 24(1)(d) of NEMA, 1998 for the implementation of the Gauteng Provincial Environmental Management Framework (2021).

The Gauteng Provincial Environmental Management Framework (GPEMF) is a legal instrument published in terms of the Environmental Management Framework Regulations, 2010, under the National Environmental Management Act, 1998 (Act No. 107 of 1998). The GPEMF provides a strategic environmental planning framework to guide sustainable development and environmental decision-making within Gauteng Province.

The objectives of the GPEMF include:

- Providing a strategic framework for environmental management within Gauteng Province;
- Aligning development with environmental opportunities and constraints;
- Identifying geographical areas where certain listed activities may be excluded from the requirement to obtain Environmental Authorisation; and
- Promoting proactive and sustainable land-use planning by identifying appropriate, conditionally compatible and inappropriate activities within the various Environmental Management Zones.

The Gauteng Provincial Environmental Management Framework Standard, 2018 provides for the exclusion of certain listed activities from the requirement to obtain Environmental Authorisation within specified Environmental Management Zones, including Zones 1 and 5, but only where the activity qualifies for the exclusion and all applicable environmental management specifications are met. The exclusion does not apply where any other non-excluded listed activity is triggered, in which case Environmental Authorisation remains required. Of particular relevance, Activity 51 specifically contemplates dangerous-goods storage in Zone 5 and requires, among other measures, appropriate bunding of above-ground storage areas and

protection of people and the environment from harmful gas exposure. Accordingly, the Standard does not provide an unconditional exemption from Environmental Authorisation. In the context of this Section 24G application, the Standard is relevant in demonstrating the spatial appropriateness and environmental management context of the activity, but it does not retrospectively regularise the unlawful commencement. While the Applicant acknowledges that the applicable requirements were not met prior to commencement and that the Section 24G process remains necessary, the fact that dangerous-goods storage is specifically contemplated under Activity 51 in Zone 5, together with the site's industrial setting and the implementation of appropriate mitigation measures, should be considered in determining an appropriate administrative fine.

The Isando Foods facility, located at 21 Quality Road, Isando, falls entirely within Zone 5 – Industrial and Large Commercial Focus Zone of the Gauteng Provincial Environmental Management Framework (Figure 3-2). Zone 5 comprises established industrial and large commercial areas where development is generally supported, provided that appropriate environmental management measures are implemented.

The proposed development does not constitute a new greenfield development but relates to the retrospective environmental authorisation of an existing dangerous goods storage facility situated within an established industrial property. The GPEMF was therefore considered during the environmental assessment to confirm the compatibility of the existing development with the surrounding land uses and to inform the evaluation of environmental sensitivities.

In terms of the GPEMF, 2019, the Isando Foods site is situated in Zone 5, and the subject activities (the expansion of facilities for the storage of a dangerous good to a limit of 500m<sup>3</sup>), is excluded from the requirement to apply for Environmental Authorisation. It is thus important to note that activities have not proceeded as 'illegal' activities, but rather 'unregistered' activities.

### 3.11.3 MUNICIPAL BYLAWS AND PLANS

The Isando Foods facility is located within the jurisdiction of the Ekurhuleni Metropolitan Municipality (EMM). The development is therefore subject to the applicable municipal planning instruments, by-laws and engineering service requirements administered by the Municipality. These planning instruments provide the framework for land use planning, municipal services, infrastructure management and environmental protection within the municipal area.

#### 3.11.3.1 Ekurhuleni Metropolitan Municipality Land Use Scheme and Municipal Planning By-law

The Ekurhuleni Metropolitan Municipality administers land use and development in accordance with the Ekurhuleni Land Use Scheme and the Ekurhuleni Metropolitan Municipality Spatial Planning and Land Use Management By-law, promulgated in terms of the Spatial Planning and Land Use Management Act, 2013 (Act No. 16 of 2013) (SPLUMA).

The Isando Foods facility is situated within an established industrial area and has historically been utilised for industrial manufacturing purposes. The Section 24G Rectification Application does not seek approval for a change in land use or rezoning of the property but rather seeks retrospective Environmental Authorisation for the unlawful expansion and operation of dangerous goods storage facilities associated

with the existing industrial operations. The proposed activity is therefore considered within the context of the existing industrial land use and applicable municipal planning controls.

#### **3.11.3.2 Ekurhuleni Metropolitan Municipality Engineering Services and Environmental By-laws**

The Ekurhuleni Metropolitan Municipality has adopted various by-laws regulating engineering services, stormwater management, waste management, environmental health and municipal infrastructure. These by-laws establish requirements for the provision and maintenance of municipal services and seek to prevent pollution, protect public health and ensure the sustainable management of municipal infrastructure.

The Isando Foods facility is serviced by existing municipal infrastructure, including water supply, sewerage, stormwater drainage and road access. The continued operation of the dangerous goods storage facilities must comply with the applicable municipal by-laws relating to stormwater management, pollution prevention, waste management, fire safety and environmental health. Appropriate spill containment measures, bunded storage areas and emergency response procedures have been incorporated into the facility to minimise the risk of pollution to municipal infrastructure and the surrounding environment.

#### **3.11.3.3 Ekurhuleni Metropolitan Spatial Development Framework (MSDF)**

The Ekurhuleni Metropolitan Spatial Development Framework (MSDF) provides the Municipality's long-term spatial planning framework and guides sustainable land use, infrastructure investment and economic development throughout the metropolitan area.

The Isando Foods facility is located within the well-established Isando industrial precinct, which is identified as an important industrial and logistics area within the Municipality. The continued operation of the existing manufacturing facility and associated dangerous goods storage infrastructure is consistent with the industrial character and intended land use of the surrounding area. As the Section 24G application relates to the rectification of an existing activity within an established industrial property, the proposal is considered to be compatible with the spatial planning objectives of the Ekurhuleni Metropolitan Municipality.

The activities on site are in line with the Spatial Development Plan.

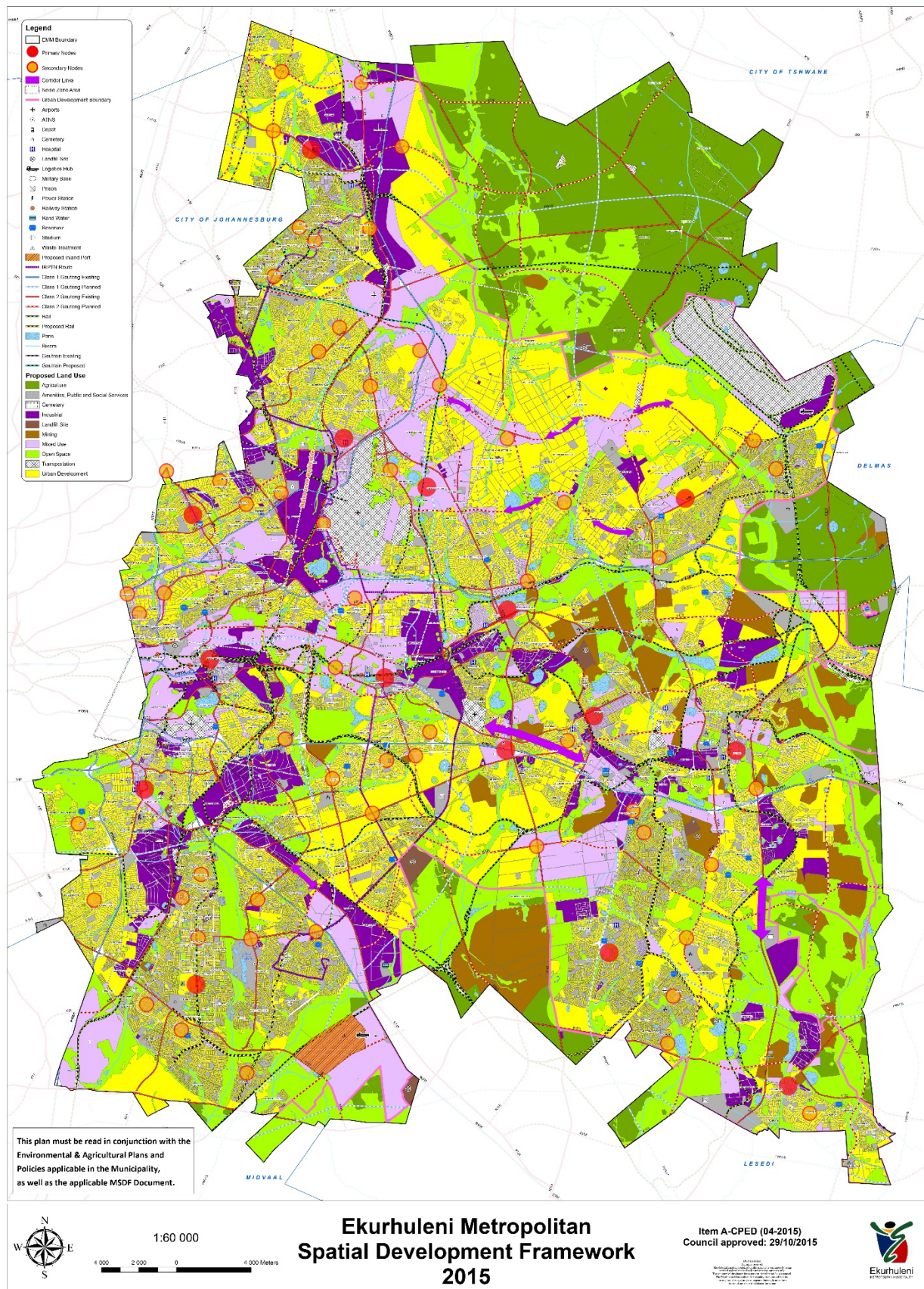


Figure 3-3: Ekurhuleni Precinct Plan

## 4 DESCRIPTION OF THE RECEIVING ENVIRONMENT

Section 3(h) of Appendix 3 of the 2014 EIA Regulations, requires that the EIA Report includes information on the *environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects*.

In line with this, and in order to understand how the environment has been affected by the development, the following section provides an overview of the receiving environment. Where necessary, this section includes information obtained from the specialist studies on the baseline conditions.

### 4.1 LOCAL CLIMATE

The climatological data for the Isando area is provided below.

#### 4.1.1 TEMPERATURE

Between the period of 2008 and 2026, the average recorded temperatures ranged from 9°C (average minimum) to 24°C (average maximum) (Figure 4-1). Information from the MCLM Baseline Assessment Report (Ekurhuleni Metropolitan Local Municipality) notes that high temperatures are usually experienced between the months of September to March.

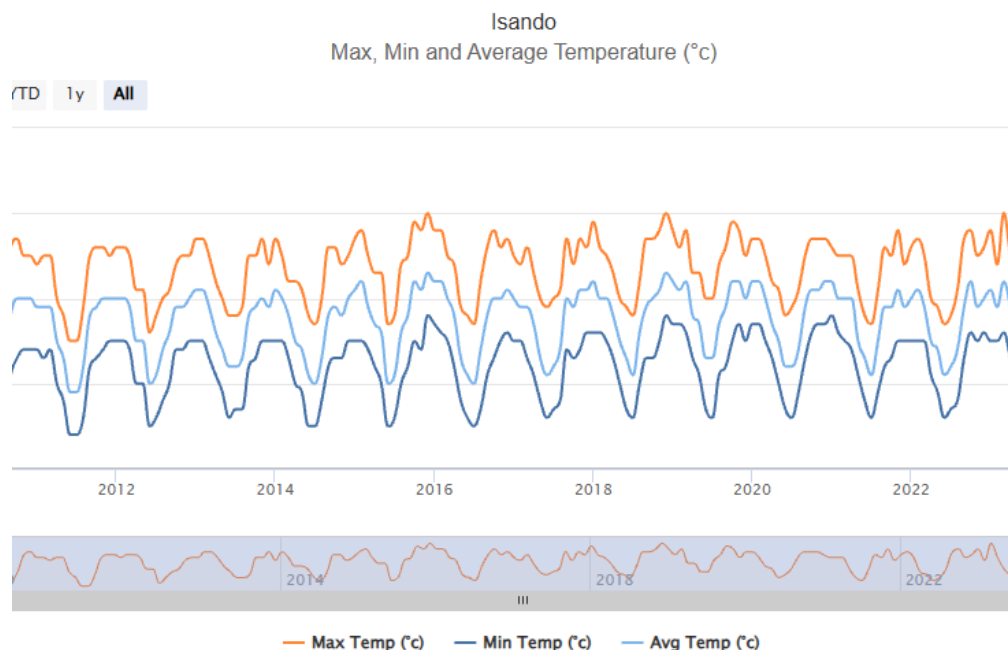


Figure 4-1: Average Temperature data for Isando (World Weather Online)

#### 4.1.2 RAINFALL

Between the period of 2008 and 2026, the average annual rainfall in the area ranged from 3.7mm (usually June/July) to 171 mm (usually December/January) (Figure 4-2).

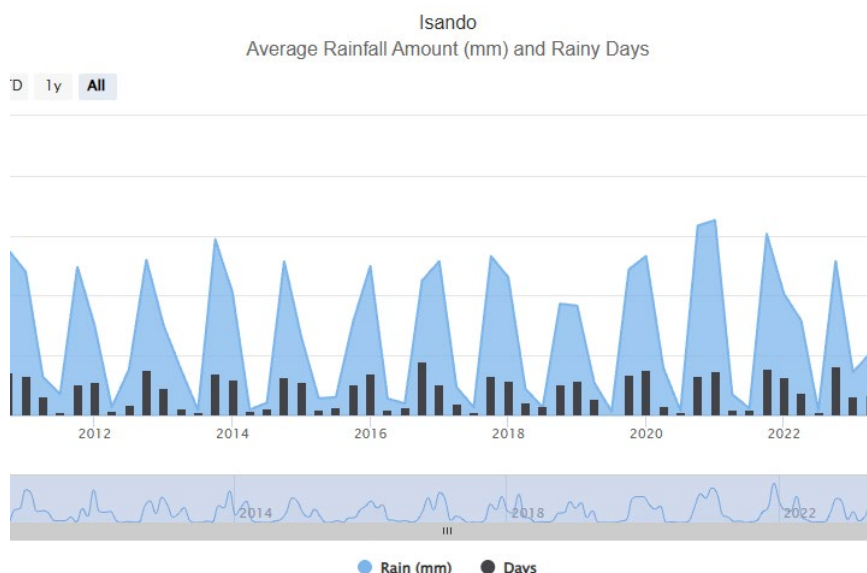


Figure 4-2: Average Rainfall data for Isando (World Weather Online)

#### 4.1.3 WIND

The Wind Rose for the Isando area shows that the wind in the area predominately blows from the north, north-west and north north-west direction. Windspeeds range from 1km/hour to 40 km/hour (Figure 4-3).

Isando  
26.14°S, 28.21°E (1715 m asl).  
Model: ERA5T.

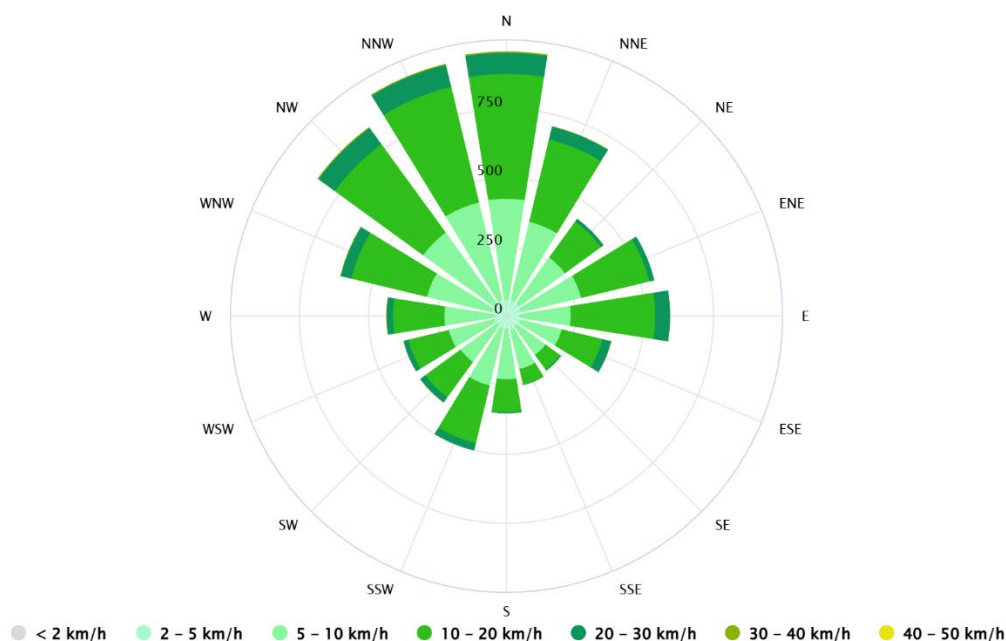


Figure 4-3: Wind Rose for the Isando Area (Meteorblue)

The development has minor impacts on the existing local climate in the area. Further, details such as rainfall data have been taken into account in the design of the development (for example, in the Stormwater Management Plan).

## 4.2 GEOLOGY AND SOILS

The site is underlain by granitic rocks of the Basement Complex (Figure 4-4), as exposed in the Johannesburg-Pretoria Dome. Typically, these Archaean intrusive igneous rocks are crosscut by diabase dykes of various ages and may contain a prominent structural fabric.

However usually referred to broadly as “granite” these rocks in fact constitute a complex suite ranging from true granite to gneiss, granodiorite and migmatite. Veins of pegmatite, aplite and quartz are common.

Six soil forms are present on the study area namely Avalon, Katspruit, Kroonstad, Longlands, Westleigh and Witbank. All of the soils are erodible except for the Katspruit and Avalon soil forms. Furthermore, except for the Kroonstad soil forms, prone to compaction.

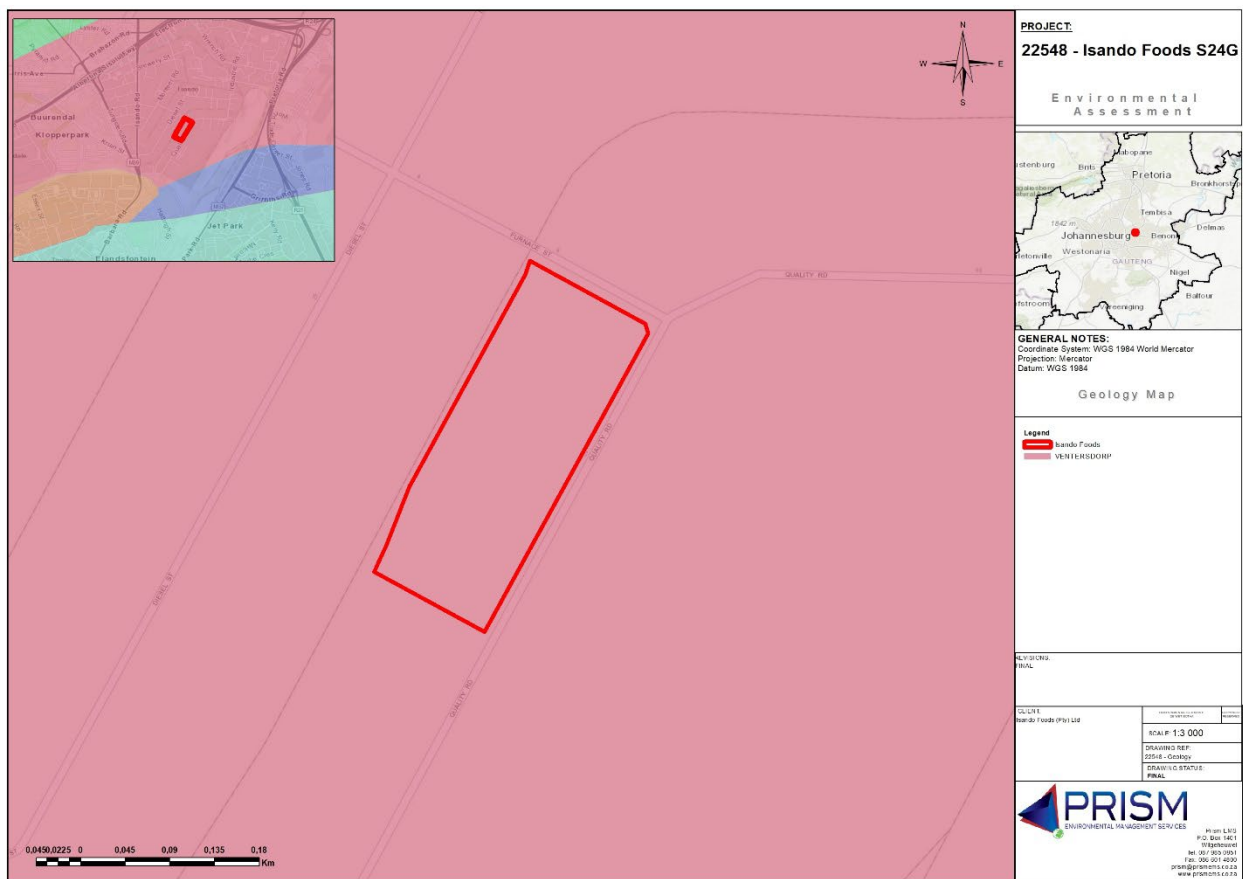


Figure 4-4: Geology Map

Existing stormwater infrastructure was found to be sufficient by the specialist who conducted the SWMP. The EMPr also includes measures to mitigate against erosion.

## 4.3 LAND USE

The Isando Foods (Pty) Ltd facility is located at 21 Quality Road, Isando, within the Ekurhuleni Metropolitan Municipality, Gauteng Province. The property forms part of the well-established Isando industrial precinct,

which is characterised by industrial manufacturing, warehousing, logistics, bulk storage facilities and associated commercial activities.

The site is fully developed and accommodates an existing vegetable oil manufacturing facility comprising production buildings, administration offices, storage warehouses, bulk storage tanks, loading and off-loading areas, internal access roads, parking areas, stormwater infrastructure and associated engineering services. The dangerous goods storage facilities that form the subject of this Section 24G Rectification Application are located within the existing industrial footprint and comprise bulk storage tanks, associated pipework, bunded containment areas and ancillary infrastructure required for the storage and handling of hexane, diesel and other hazardous chemicals used in the manufacturing process.

The property has historically been utilised for industrial purposes and is surrounded by similar industrial and commercial developments. Adjacent land uses include manufacturing facilities, warehouses, logistics operations and commercial businesses, with no significant natural or agricultural land occurring within the immediate vicinity of the site. The proposed Section 24G application therefore relates to the continued operation of infrastructure within an established industrial environment and does not involve the development of previously undeveloped land or the expansion of the facility beyond its existing operational footprint.

The property is serviced by existing municipal infrastructure, including water supply, sewerage, electricity, stormwater drainage and road access. No additional municipal services are required as part of the Section 24G Rectification Application.

The existing industrial land use is consistent with the surrounding character of the Isando industrial area and aligns with the applicable municipal planning framework and the Gauteng Provincial Environmental Management Framework (GPEMF), which identifies the site as being located within Zone 5: Industrial and Large Commercial Focus Zone. The unlawful activity requiring rectification is therefore limited to the commencement and operation of dangerous goods storage facilities without prior Environmental Authorisation and does not constitute a change in the overall land use of the property.

Site Photographs taken in August 2026 are also provided in the appendices below and shows the current land use.

The existing land use and status of the environment have been taken into account during the site assessments. Much of the site has been transformed by historical construction activities (i.e., Non-permeable surfaces, Industrial buildings). These activities have completely modified the natural environment.

## 4.4 EXISTING ACCESS ROADS

The Isando Foods (Pty) Ltd facility is located at 21 Quality Road, Isando, within the Ekurhuleni Metropolitan Municipality. The property is situated within the established Isando industrial area and is accessed directly from Quality Road, which provides access to the site's existing entrance and internal circulation network.

Quality Road connects to the surrounding industrial road network via Diesel Street, Furnace Street, Industry Road and Isando Road, providing convenient access for employees, service vehicles and the transport of raw materials and finished products. The surrounding road network has been developed to accommodate industrial and commercial traffic associated with the Isando industrial precinct.

Regional access to the site is provided via the R24 (Albertina Sisulu Freeway) and the R21, which connect the Isando industrial area with Johannesburg, OR Tambo International Airport, Kempton Park and the broader Gauteng freight and logistics network. These existing transport routes facilitate the movement of dangerous goods, raw materials and manufactured products to and from the facility.

The Section 24G Rectification Application relates to the continued operation of existing dangerous goods storage facilities within an established industrial property and does not require the construction of new access roads or the upgrading of the existing road network. Existing access arrangements are considered adequate for the continued operation of the facility. The existing roads are shown in Figure 4-5.

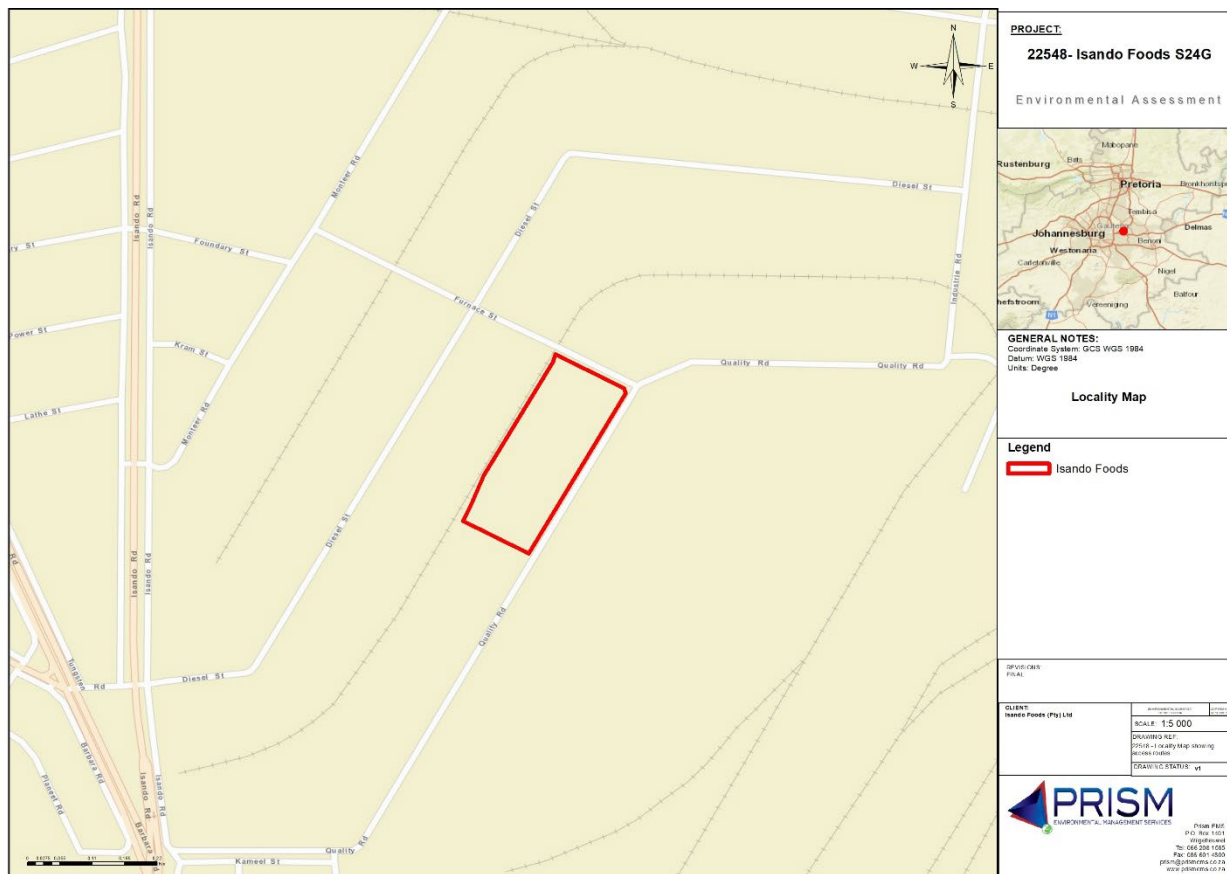


Figure 4-5: Locality Map indicating site access

## 4.5 EXISTING SERVICES

The Isando Foods (Pty) Ltd facility is situated within the established Isando industrial area in the Ekurhuleni Metropolitan Municipality and is serviced by existing municipal infrastructure. As the Section 24G Rectification Application relates to the continued operation of an existing industrial facility, no additional municipal services are required. The existing services available at the site include the following:

### Existing Municipal Water Supply

- The facility is connected to the Ekurhuleni Metropolitan Municipality potable water supply network.
- Municipal water is utilised for domestic purposes, production processes, cleaning operations, fire protection systems and other operational requirements associated with the manufacturing facility.
- Existing water infrastructure is considered adequate for the continued operation of the facility.

### Existing Electrical Supply

- The facility receives electricity from the municipal electricity distribution network, with internal electrical infrastructure supplying the manufacturing plant, administration buildings, warehouses, storage facilities and associated operational infrastructure.
- Existing electrical infrastructure is adequate to support the continued operation of the dangerous goods storage facilities.

### Existing Sewer Infrastructure

- The facility is connected to the Ekurhuleni Metropolitan Municipality's municipal sewer network.
- Domestic wastewater generated from offices, ablution facilities and staff amenities is discharged to the municipal sewer system in accordance with municipal requirements.
- Process wastewater generated during manufacturing operations is managed in accordance with the facility's operational procedures and applicable municipal discharge requirements, where applicable.

### Existing Stormwater Infrastructure

- The property is serviced by an established stormwater drainage system designed to convey clean stormwater to the municipal stormwater network.
- Stormwater management measures have been incorporated into the facility to minimise the potential for contamination arising from the storage and handling of dangerous goods.
- Areas associated with the storage of hazardous substances are provided with appropriate containment measures, including bunding and controlled drainage, to prevent contaminated runoff from entering the municipal stormwater system.

### Fire Protection and Emergency Services

- The facility is equipped with existing fire protection infrastructure appropriate for an industrial facility storing dangerous goods. This includes fire water supply infrastructure, fire detection and suppression systems, emergency response equipment and spill containment measures.
- These systems form part of the facility's operational safety management programme and support compliance with applicable fire safety and occupational health and safety requirements.

The existing municipal services are considered adequate to support the continued operation of the Isando Foods facility. The proposed Section 24G Rectification Application does not require the installation or upgrading of municipal engineering services, as it relates solely to the retrospective environmental authorisation of existing dangerous goods storage infrastructure.

As part of the environmental authorisation process, copies of the Environmental Impact Report will be submitted to the Ekurhuleni Metropolitan Municipality and other relevant commenting authorities for review and comment.

## 4.6 AGRICULTURAL POTENTIAL

Agricultural potential can be defined as “*Land that has the soil and terrain quality, growing season, and available moisture supply needed to produce sustained high yield of crops economically when treated and managed according to best possible farming practices*”. Another important term, is that of Agricultural land capability which is ‘*the total suitability for use, in an ecologically sustainable way, for crops, for grazing, for woodland and for wildlife.*’

According to the Gauteng Agricultural Potential Atlas (GAPA) IV, the site has built-up agricultural potential (Figure 4-6). The site has been historically developed for industrial purposes and is occupied by an existing vegetable oil manufacturing facility comprising production buildings, warehouses, bulk storage tanks, administration offices, internal roads and associated engineering infrastructure. As such, the property no longer possesses agricultural capability and is not utilised for agricultural production.

Areas of High and Moderate agricultural potential occur outside the established industrial area, predominantly to the south of the site. These areas are separated from the project site by existing industrial developments, transport infrastructure and other urban land uses. Consequently, the Section 24G Rectification Application, which relates to the continued operation of existing dangerous goods storage facilities within an established industrial property, will not result in the loss or fragmentation of agricultural land or agricultural resources.

Given the fully developed nature of the site and its location within an existing industrial area, the proposed rectification application is not expected to have any impact on agricultural potential or agricultural production within the surrounding area.

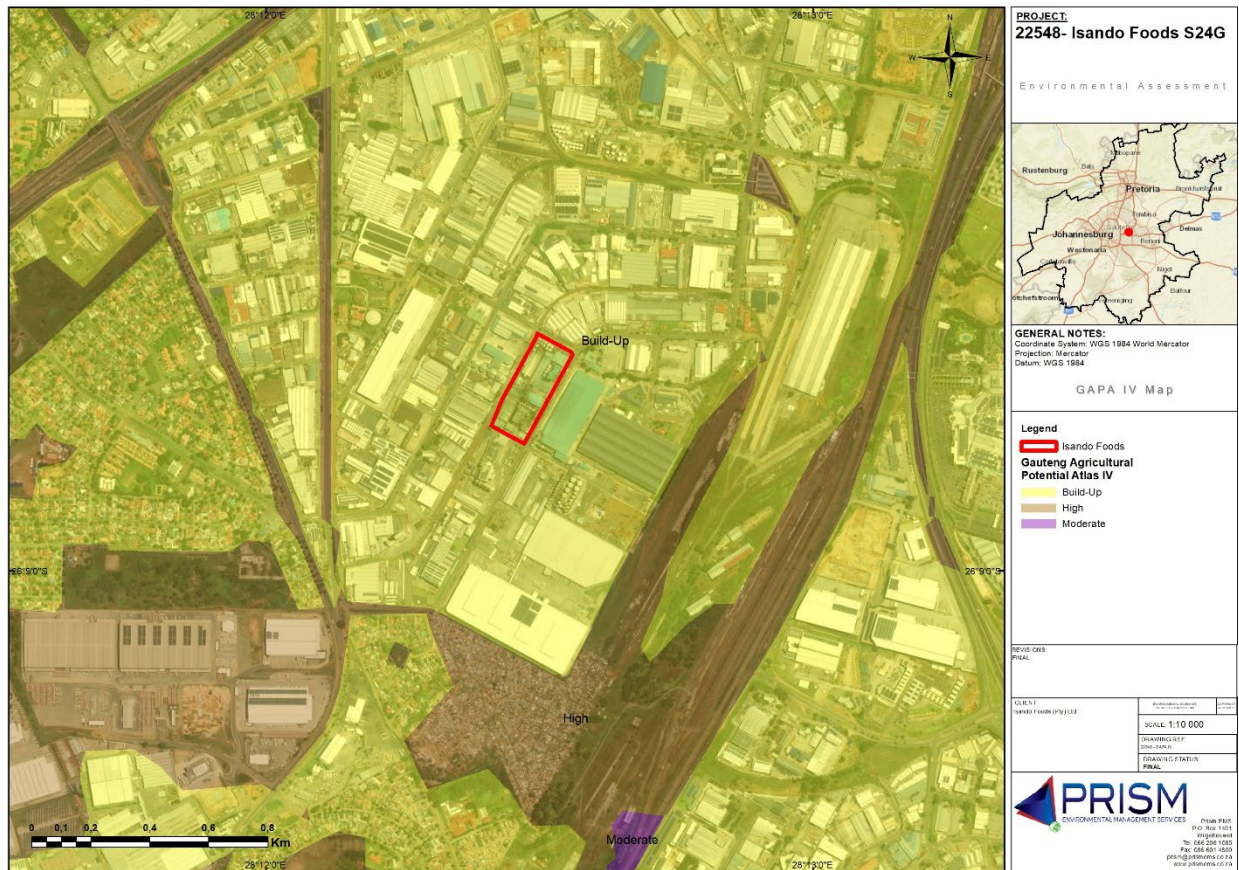


Figure 4-6: Gauteng Agricultural Potential Atlas IV

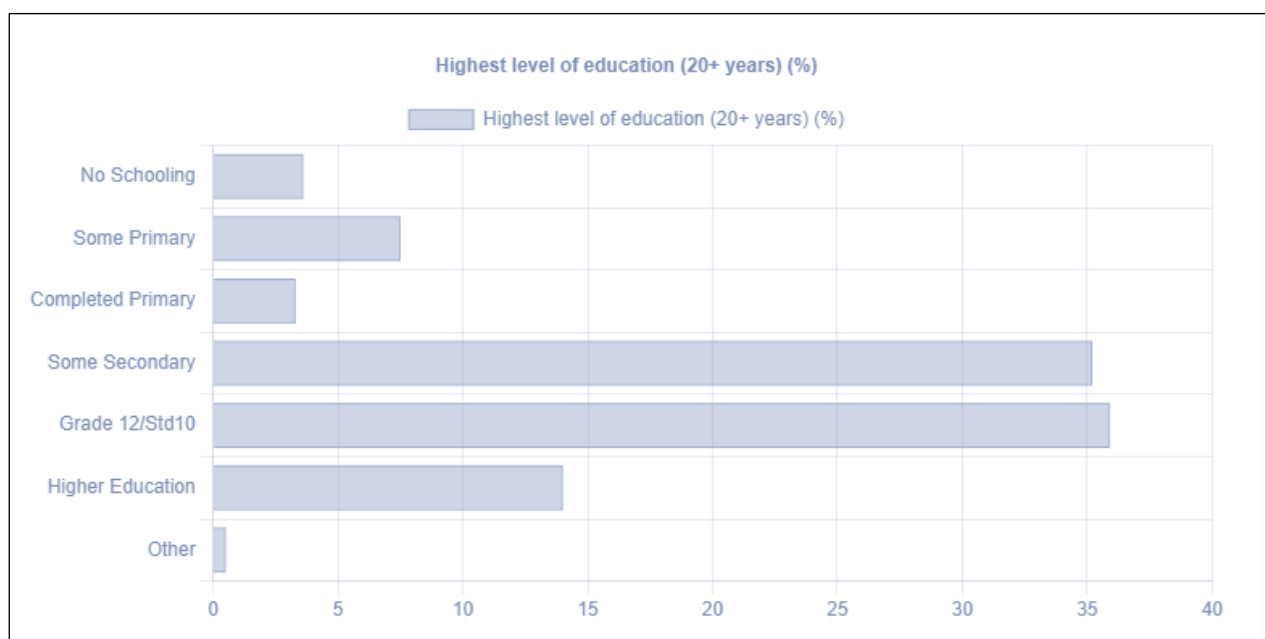
The map above illustrates the agricultural potential of the site and surrounding area as identified by the Gauteng Agricultural Potential Atlas (GAPA) IV.

## 4.7 SOCIO-ECONOMIC ENVIRONMENT

### 4.7.1 PRE-COMMENCEMENT

According to Census 2011, Ekurhuleni Metropolitan Municipality had a total population of 3 178 470 of people, of which 78.7% were black African, 15.8% were white, 2.7% were coloured, and 2.1% were Indian/Asian.

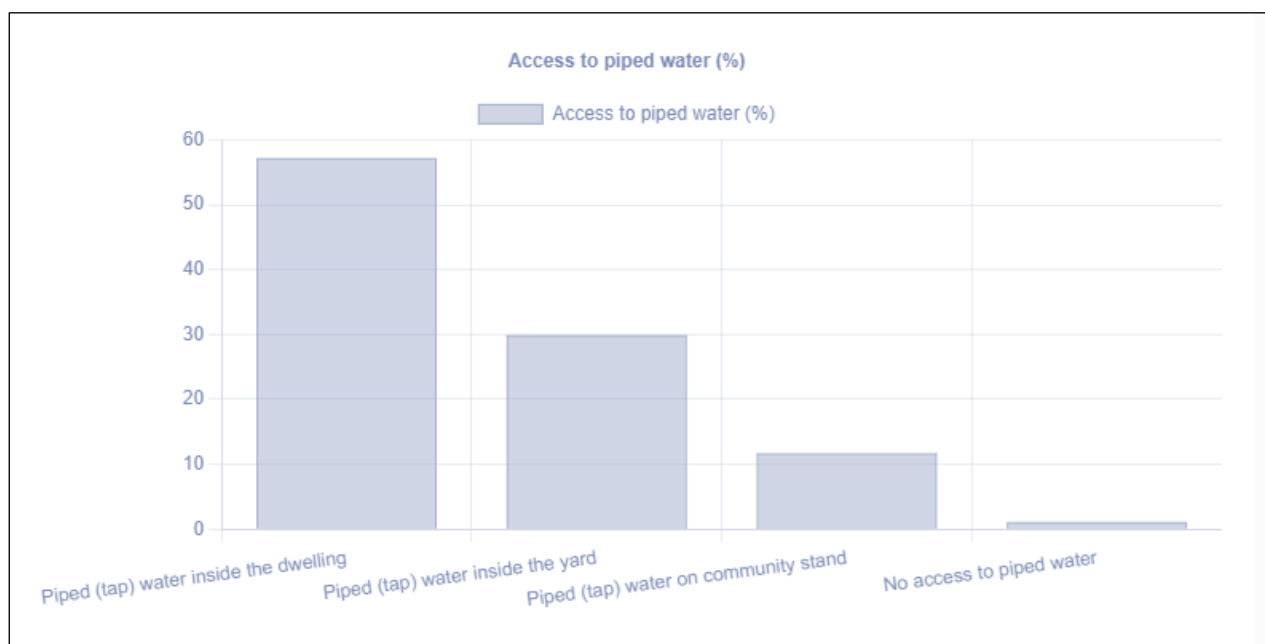
Of those aged 20 years and older, 3.3% completed primary school, 35.2% had some secondary education, 35.9% had completed matric, and 14% had some form of higher education (Figure 4-7).



**Figure 4-7: Education level (Census, 2011).**

In terms of household number and size, there were 1 015 398 households in the municipality.

A total of 57.2% of households had access to piped water inside the dwelling, 29.9% had access to piped water inside the yard, and 11.7% had access to piped water on community stand. 1.1% had no access to piped water at all (Figure 4-8).



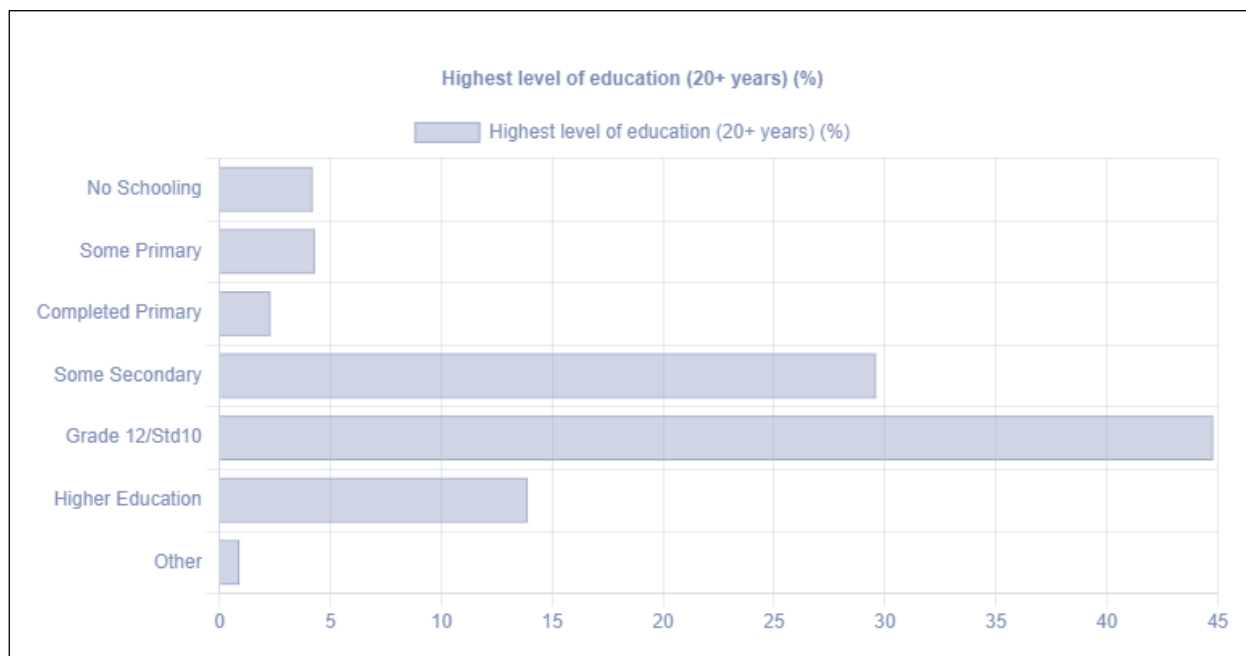
**Figure 4-8: Access to piped water (Census, 2011)**

The facility contributes capital investment in the area which has a multiplier effect in the region. In addition, the production facility provides a number of permanent employment opportunities. This is especially important in light of the high unemployment rate in the area.

#### 4.7.2 POST COMMENCEMENT

According to Census 2022, Ekurhuleni Metropolitan Municipality has a total population of 4 066 691 of people, of which 85.3% are black African, 10.3% are white, 2.5% are coloured, and 1.8% are Indian/Asian.

Of those aged 20 years and older, 2.3% have completed primary school, 29.6% have some secondary education, 44.8% have completed matric, and 13.9% have some form of higher education (Figure 4-9).



**Figure 4-9: Education level (Census, 2022).**

In terms of household number and size, there are 1 421 003 households in the municipality.

A total of 73.8% of households have access to piped water inside the dwelling, 20.3% have access to piped water inside the yard, and 5.2% have access to piped water on community stand. 0.8% have no access to piped water at all. More than 7% of households have no income (Figure 4-10).

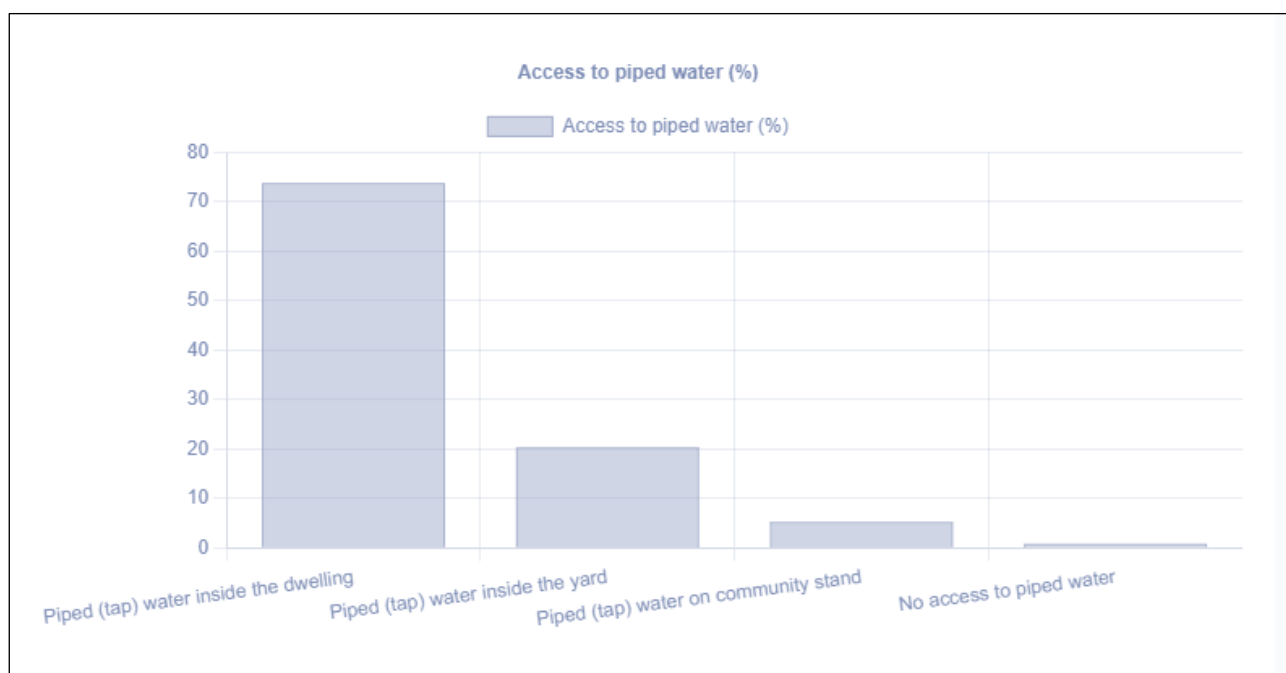


Figure 4-10: Access to piped water (Census, 2022).

## 4.8 TOURISM

The Isando Foods (Pty) Ltd facility is located within the established Isando industrial precinct in the Ekurhuleni Metropolitan Municipality, Gauteng Province. The surrounding area is characterised by industrial manufacturing, warehousing, logistics, commercial enterprises and transport infrastructure. Consequently, tourism is not considered to be a primary land use within the immediate vicinity of the site.

The Ekurhuleni Metropolitan Municipality promotes tourism through a variety of attractions, including business tourism, aviation-related tourism associated with OR Tambo International Airport, cultural and heritage attractions, sporting facilities and nature reserves. However, these tourism assets are generally located outside the Isando industrial area and are not directly influenced by the continued operation of the Isando Foods manufacturing facility.

Given the industrial nature of the surrounding environment, together with the existing transportation and logistics activities occurring throughout the Isando industrial precinct, the activities are not expected to result in any direct or indirect impacts on tourism resources, tourism-related infrastructure or visitor experiences within the Ekurhuleni Metropolitan Municipality. The continued operation of the facility is therefore considered compatible with the existing industrial land uses and is not anticipated to adversely affect tourism within the broader region.

## 4.9 BIODIVERSITY

### 4.9.1 GAUTENG CONSERVATION PLAN

The Gauteng Conservation Plan (C-Plan) Version 4.0 is the provincial systematic biodiversity conservation plan developed by the Gauteng Department of Environment to guide biodiversity conservation, land-use planning and environmental decision-making throughout Gauteng Province. The C-Plan identifies terrestrial and aquatic biodiversity priority areas required to conserve representative ecosystems, threatened species and important ecological processes while supporting sustainable development.

The Gauteng Conservation Plan is founded on the principles of systematic biodiversity planning, including representativeness, persistence, connectivity, efficiency, resilience and ecological functionality. It serves as the primary biodiversity decision-support tool for environmental impact assessments, municipal spatial planning, biodiversity stewardship programmes and protected area expansion within Gauteng Province.

C-Plan v4 identifies the following biodiversity management categories:

- **Critical Biodiversity Areas (CBAs):** Areas that are required to meet biodiversity conservation targets and maintain ecological processes. These areas represent the most important terrestrial and aquatic habitats within Gauteng and should be maintained in a natural or near-natural condition wherever possible.
- **Ecological Support Areas (ESAs):** Areas that support the ecological functioning of Critical Biodiversity Areas and Protected Areas through the maintenance of ecological processes, habitat connectivity and ecosystem resilience.
- **Protected Areas (PAs):** Areas formally protected under applicable conservation legislation.
- **Other Areas:** Landscapes that have been transformed through urban, industrial, commercial or other intensive land uses and which no longer provide significant biodiversity value.

The Gauteng Conservation Plan (C-Plan v4) indicates that the Isando Foods property does not fall within a Critical Biodiversity Area (CBA), Ecological Support Area (ESA) or Protected Area (Figure 4-11). The nearest biodiversity priority areas occur outside the project site and are associated with fragmented open spaces and transport corridors within the surrounding urban landscape.

The project site is located within the established Isando industrial precinct and has been extensively transformed through long-standing industrial development. The property is occupied by existing manufacturing buildings, warehouses, bulk storage tanks, paved hardstand areas, internal roads and associated engineering infrastructure. Consequently, the site no longer supports natural habitat or ecological processes that would contribute significantly to provincial biodiversity conservation objectives.

The Section 24G Rectification Application relates to the continued operation of existing dangerous goods storage facilities located entirely within the existing industrial footprint. No expansion into undeveloped land, removal of indigenous vegetation or disturbance of biodiversity priority areas is proposed. Accordingly, the proposed rectification application is not expected to result in the loss, fragmentation or degradation of Critical Biodiversity Areas, Ecological Support Areas or Protected Areas.

A desktop assessment indicates that the project is unlikely to have any significant impacts on terrestrial biodiversity or ecological processes at either the site or landscape scale. Figure 4-11 illustrates the location of the project site relative to the Gauteng Conservation Plan (C-Plan v4).

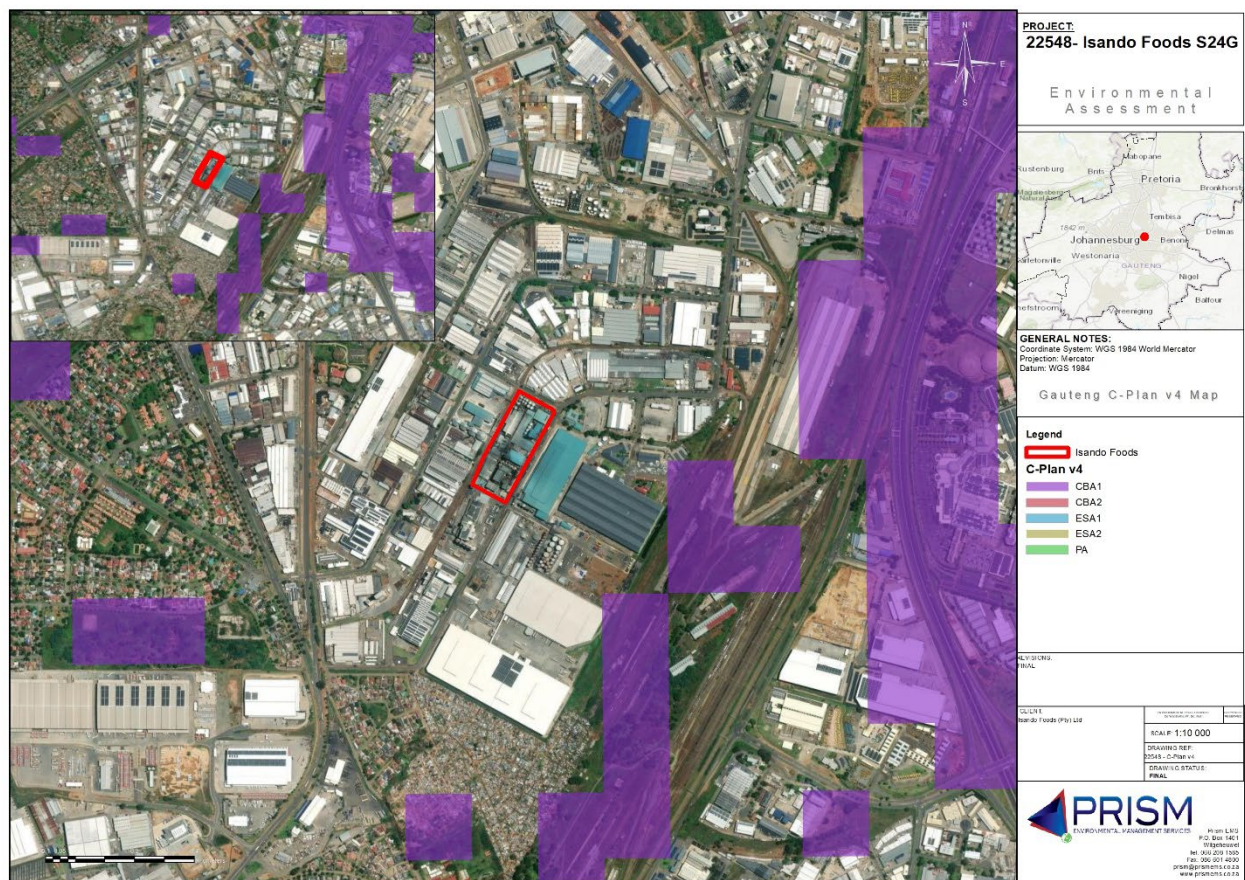


Figure 4-11: C-Plan v4 Map

#### 4.9.2 THREATENED TERRESTRIAL ECOSYSTEMS

The National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) provides for the identification and protection of threatened terrestrial ecosystems through the publication of the National List of Ecosystems that are Threatened and in Need of Protection. The current national list is reflected in the Revised List of Threatened Ecosystems (RLE2022), which replaced the original list published in 2011. The purpose of identifying threatened ecosystems is to reduce the rate of ecosystem degradation and biodiversity loss by protecting representative ecosystems and maintaining ecological functioning.

The RLE2022 mapping indicates that the Isando Foods property is situated within an area classified as Vulnerable (VU). Areas classified as Least Concern (LC) occur to the west of the site within the surrounding landscape.

Although the project site falls within a mapped Vulnerable ecosystem, the property is located within the long-established Isando industrial precinct and has been extensively transformed through historical industrial development. The site is fully developed and occupied by existing manufacturing buildings, warehouses, bulk storage tanks, internal roads, hardstand areas and associated infrastructure.

Consequently, little or no natural habitat remains on the property to support the ecological characteristics of the mapped ecosystem.

The Section 24G Rectification Application relates to the continued operation of existing dangerous goods storage facilities within the established industrial footprint. No expansion into undeveloped land, removal of indigenous vegetation or disturbance of remnant natural habitat is proposed. Accordingly, the proposed rectification application is not expected to result in any additional loss, fragmentation or degradation of threatened terrestrial ecosystems beyond the existing historically transformed condition of the site.

Given the highly urbanised and industrial nature of the surrounding environment, together with the existing level of disturbance on the property, the proposed rectification application is considered unlikely to have a significant impact on threatened terrestrial ecosystems or their conservation objectives.

#### **4.9.3 GAUTENG PROVINCIAL ENVIRONMENTAL MANAGEMENT FRAMEWORK (GPEMF, 2019)**

The objective of the GPEMF is to guide sustainable land use management within the Gauteng Province and has the following purpose:

- To provide a strategic and overall framework for environmental management in Gauteng;
- Align sustainable development initiatives with the environmental resources, developmental pressures, as well as the growth imperatives of Gauteng;
- Determine geographical areas where certain activities can be excluded from an EIA process; and
- Identify appropriate, inappropriate and conditionally compatible activities in various Environmental Management Zones in a manner that promotes proactive decision-making.

The GPEMF identified a number of Environmental Management Zones (EMZs) based on the desired state, and the environmental sensitivity (amongst others). These are as follows:

- Zone 1: Urban development zone
- Zone 2: High control zone (within the urban development zone)
- Zone 3: High control zone (outside the urban development zone)
- Zone 4: Normal control zone
- Zone 5: Industrial and large commercial focus zone

The development falls within Zone 5: Industrial and large commercial focus zone (Figure 4-12).

Zone 5 comprises areas that have already been extensively transformed through industrial, commercial and associated urban development. The primary objective of this zone is to support and promote industrial and commercial activities in appropriate locations while ensuring that potential environmental impacts are identified, managed and mitigated through the applicable environmental legislative framework.

Unlike environmentally sensitive areas identified in other GPEMF zones, Zone 5 is intended to facilitate appropriate economic development within established industrial areas. Nevertheless, developments remain subject to the requirements of the National Environmental Management Act, 1998 (Act No. 107 of 1998),

where listed activities are triggered, unless specifically excluded in terms of the GPEMF Standard for the Development, Expansion and Redevelopment of Infrastructure or Facilities, 2021, as amended.

In terms of the GPEMF, 2019, the Isando Foods site is situated in Zone 5, and the subject activities (the expansion of facilities for the storage of a dangerous good to a limit of 500m³), is excluded from the requirement to apply for Environmental Authorisation. It is thus important to note that activities have not proceeded as 'illegal' activities, but rather 'unregistered' activities.

The Isando Foods facility is an existing industrial development comprising manufacturing buildings, warehouses, dangerous goods storage tanks, hardstand areas and associated infrastructure. The current Section 24G application relates to the retrospective environmental authorisation of existing listed activities that commenced without the required Environmental Authorisation. No expansion beyond the existing developed footprint is proposed.

Although the property is situated within **Zone 5**, the unregistered commencement of listed activities cannot be exempted through the GPEMF Standard, and retrospective registration/authorisation is therefore required in terms of Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998).

Appropriate mitigation measures for the continued operation of the facility have been incorporated into the Environmental Management Programme (EMPr) to ensure that potential environmental impacts associated with the existing operations are appropriately managed.

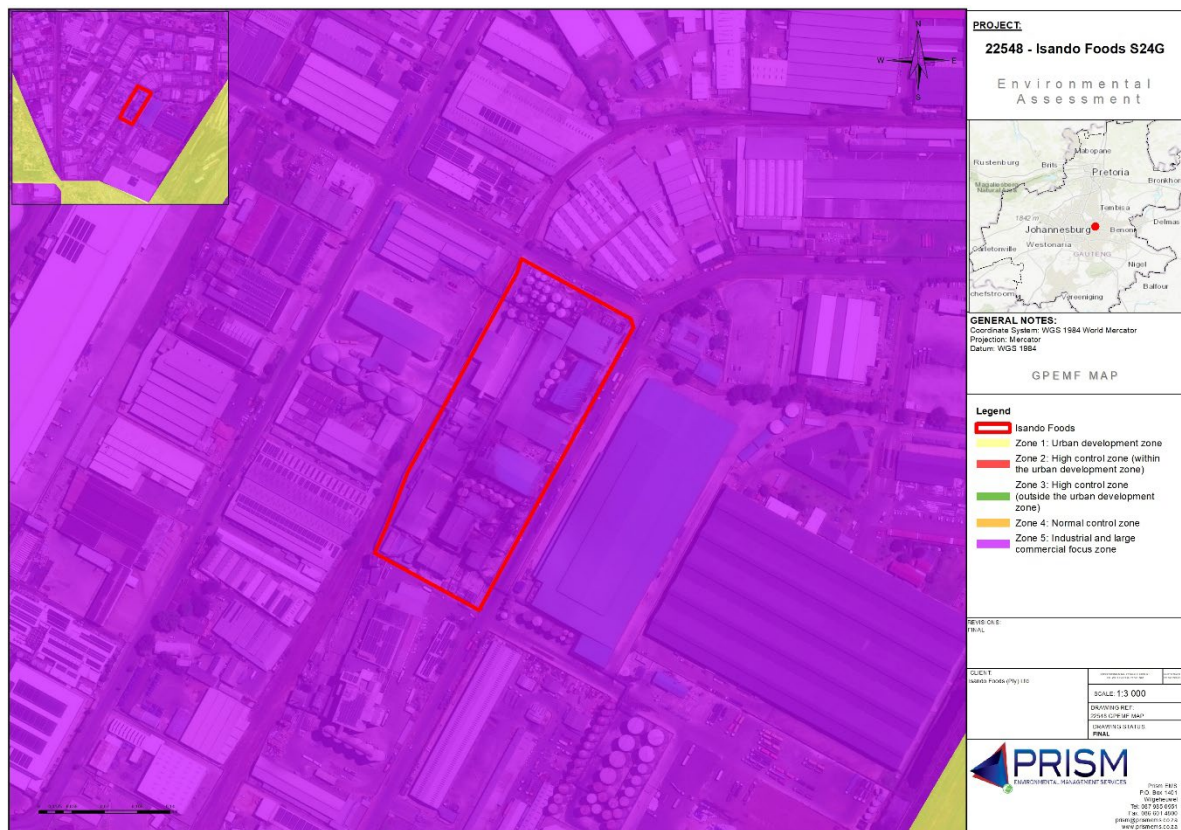


Figure 4-12: Gauteng Provincial Environmental Management Framework

#### 4.9.4 FAUNA

The National Screening Tool has indicated that in terms of fauna (invertebrates, birds, mammals, reptiles etc.), the site has a medium sensitivity, with potential *Invertebrates-Clonia uvarovi* and mammals (*Mammalia- Chrysospalax villosus* and *Mammalia- Crocidura maquassiensis*).

No sensitive fauna species were observed during any of the site visits. It is highly unlikely that any fauna species will be encountered on site while the operation is ongoing, however, mitigation measures are included in the EMP for the correct handling of animals on site.

#### 4.9.5 PROTECTED AREAS AND IMPORTANT BIRD AREAS

Protected Areas are those areas included in the South African Protected Areas Database (SAPAD). This database is maintained by the Department of Forestry, Fisheries and the Environment (DFFE) as required by the National Environmental Management: Protected Areas Act (Act 57 of 2003).

Important Bird and Biodiversity Areas (IBAs), as defined by BirdLife International, constitute a global network of over 13 500 sites, of which 112 sites are found in South Africa. IBAs are sites of global significance for bird conservation, identified nationally through multi-stakeholder processes using globally standardised, quantitative, and scientifically agreed criteria. Essentially, these are the most important sites for conserving. Figure 4-13 shows that the Isando Foods study site is not located in close proximity to any Protected Areas and IBAs.

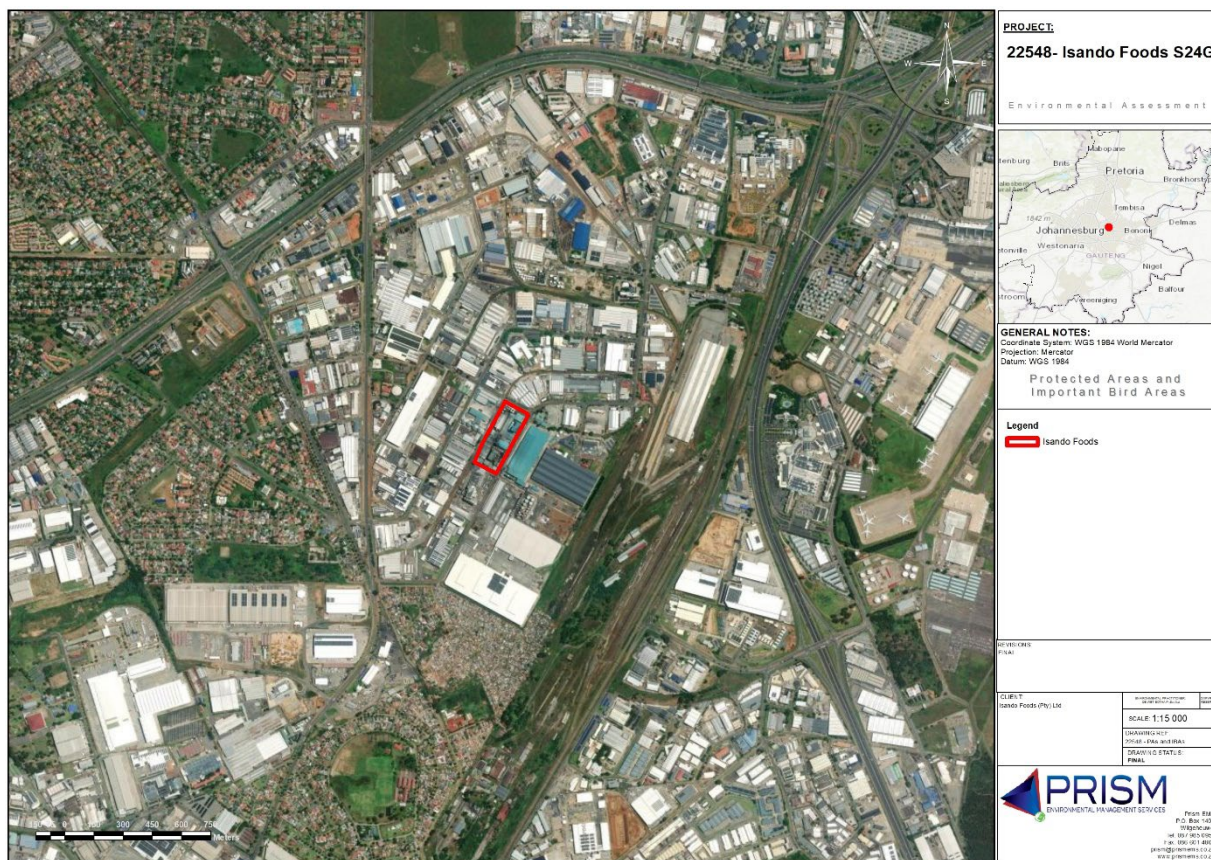


Figure 4-13: IBA and Protected Areas

#### 4.9.6 EXISTING STATUS

As noted above, the maps produced identify desktop sensitivity. Refer to the appendices for site visit pictures.

Due to the desktop sensitivities identified through the utilisation of Geographic Information Systems (GIS) as well as the National Screening Tool requirements. The study area is highly disturbed in terms of aspects such as human activities on and surrounding the site. The site has been transformed by historical industrial human activities as well as construction activities.

#### 4.10 SURFACE WATER

The facility is located within quaternary catchments C21D of the Vaal-Orange Water Management Area. The National Wetland Map Version 6 (NWM6), as presented by SANBI, shows that the site is not in close proximity to any water resources.

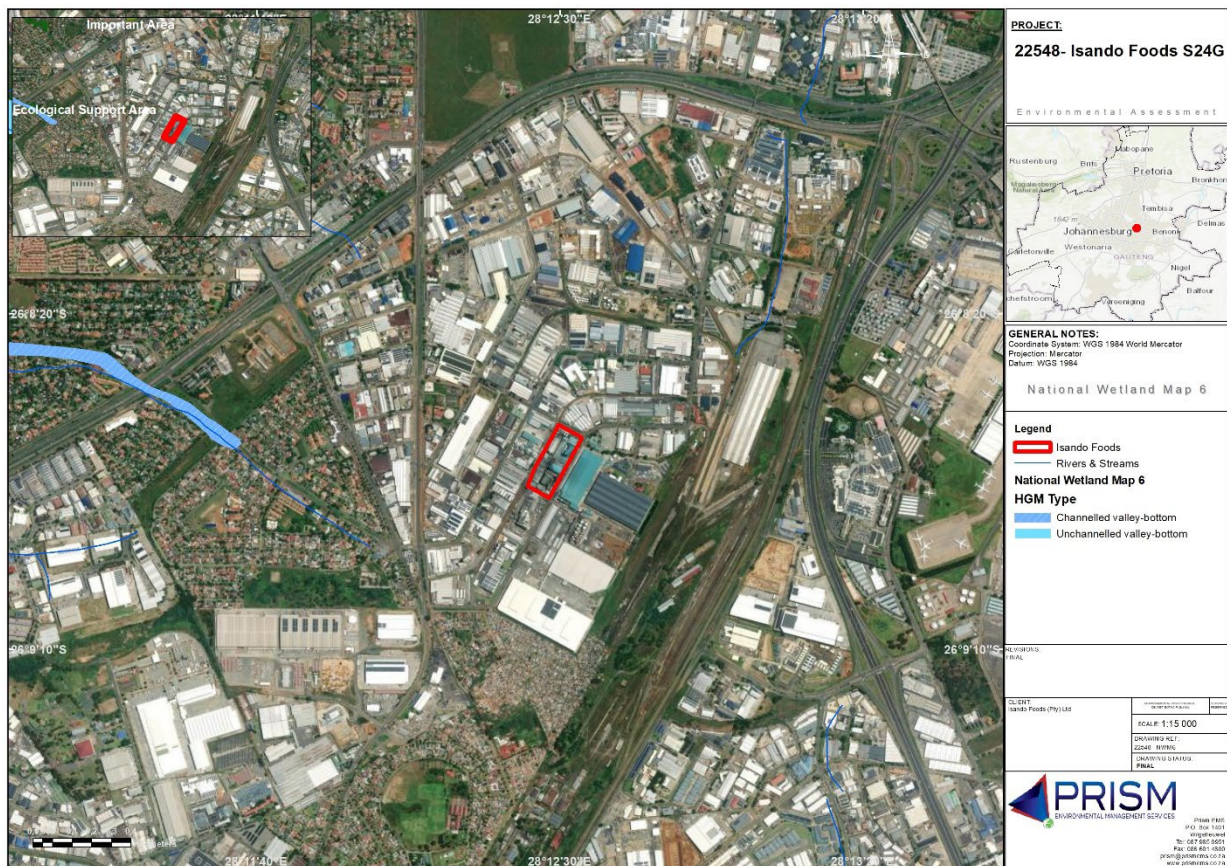


Figure 4-14: NWM6

Due to the fact that no wetland systems are located within close proximity to the site, it was determined by the wetland specialist that the impacts would be negligible on wetland systems in the region. The recommendations of the specialist have been included in the EMPr and taken into account in the Impact Assessment.

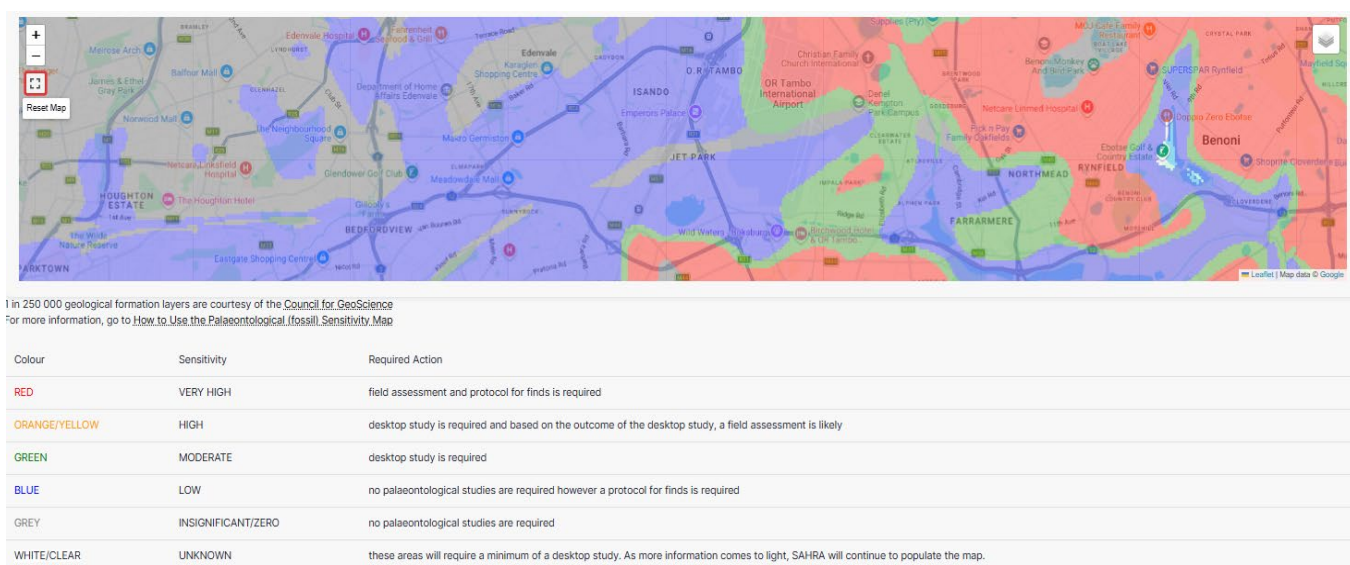
## 4.11 ARCHAEOLOGY, CULTURAL HERITAGE AND PALAEOLOGY

### 4.11.1 ARCHAEOLOGY AND CULTURAL HERITAGE

As indicated by the Screening Tool the archaeological and cultural heritage has a low sensitivity. Protected areas are not located near to the site as indicated in Figure 4-13.

### 4.11.2 PALAEOLOGY

The Palaeontological (Fossil) Sensitivity Map developed by SAHRA has been reviewed and shows that the site does not fall within an area with high fossil sensitivity (Figure 4-15 below).



**Figure 4-15: Palaeontological (Fossil) Sensitivity Map (obtained from South African Heritage Resources Information System (SAHRIS)).**

SAHRA will be notified and provided an opportunity to comment on the EIA Report which is available for public review.

## 5 PROJECT DESCRIPTION

The Appendix 3 of the 2014 EIA Regulations requires that the following information is provided in the EIA Report:

*3 (b) the location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report, including:*

- (i) the 21-digit Surveyor General code of each cadastral land parcel;*
- (ii) where available, the physical address and farm name; and*
- (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;*

*3 (c) a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is-*

- (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken;*
- (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;*

*3 (d) a description of the scope of the proposed activity, including-*

- (i) all listed and specified activities triggered and being applied for; and*
- (ii) a description of the associated structures and infrastructure related to the development.*

In line with this, Chapter 5.2 provides information on the listed activities triggered, Chapter 5.1, provides information on the project location and Chapter 5.3, provides information on the development (including associated infrastructure).

Please note that A3 copies of maps and drawings are attached under cover of the relevant appendices.

### 5.1 PROPERTY AND LOCATION

#### 5.1.1 DEVELOPMENT LOCATION AND PROPERTIES

The site is located on Portion 695 of the farm Witkoppie 332 IR, Isando, Ekurhuleni Metropolitan Municipality, Gauteng Province, South Africa. The Surveyor General 21-digit diagram numbers for the affected properties are provided in Table 5-1 below.

**Table 5-1: Surveyor General Diagram Numbers.**

| Surveyor General Diagram number | Property Description                 |
|---------------------------------|--------------------------------------|
| T01R03320000069500000           | Portion 695 of the farm Witkoppie IR |

Further, the corner point coordinates of the site are indicated in Table 5-2.

**Table 5-2: Corner Coordinates.**

| Number | Coordinates |
|--------|-------------|
|--------|-------------|

|   |                              |
|---|------------------------------|
| 1 | 26° 8'34.23"S; 28°12'25.50"E |
| 2 | 26° 8'36.44"S; 28°12'29.71"E |
| 3 | 26° 8'39.76"S; 28°12'22.14"E |
| 4 | 26° 8'41.72"S; 28°12'26.58"E |

Refer to Figure 1-1 and Figure 1-2 in Chapter 1 for the locality map and aerial locality map showing the location of the development.

Figure 5-1 below contains the site development plan of the Isando Foods production facility.

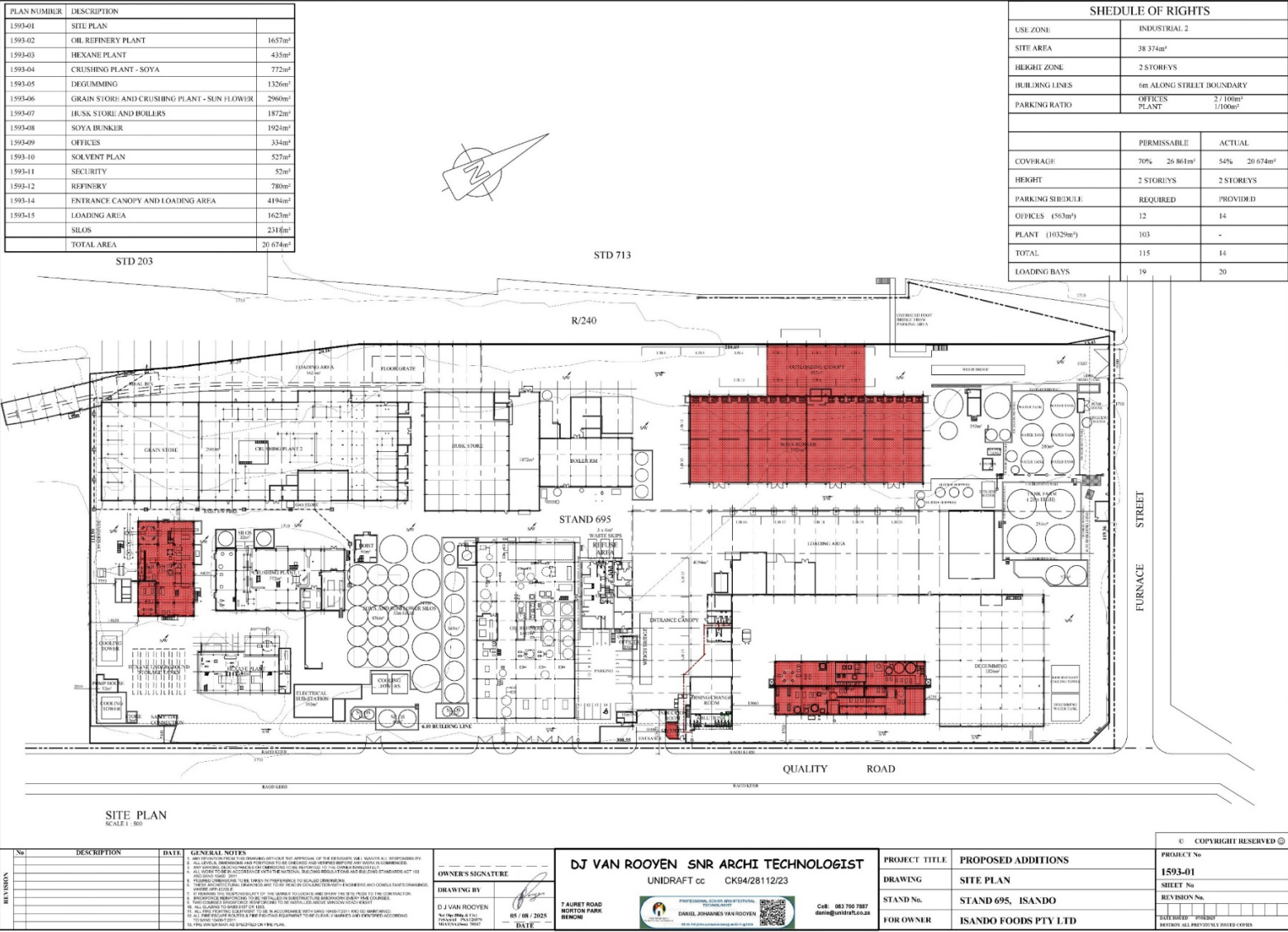


Figure 5-1: Site Development Plan

In terms of the EIA Regulations and Listed Activities 2014, the activities that are triggered under the Listing Notices for this development are provided in Table 5-3. Refer to Chapter 3 for a description and overview of the applicable legislative framework.

**Table 5-3: Description of the Listed Activities Triggered under NEMA.**

| Listing Notice                                           | Activity | Description of Listed Activity                                                                                                                                                                                     | Interpretation                                                                                                                                                                                                                    |
|----------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>NEMA: Listing Notice 1 (require Basic Assessment)</i> |          |                                                                                                                                                                                                                    |                                                                                                                                                                                                                                   |
| GN R 327<br>4 December 2014<br>(as amended)              | 51       | <i>The expansion and related operation of facilities for the storage, or storage and handling, of a dangerous good, where the capacity of such storage facility will be expanded by more than 80 cubic metres.</i> | As the above activities have already commenced, Environmental Authorisation (Registration of Activities) is applied for by means of conducting a Section 24G application process in accordance with GNR327, of 2014 (as amended). |

In terms of the GPEMF, 2019, the Isando Foods site is situated in Zone 5, and the subject activities (the expansion of facilities for the storage of a dangerous good to a limit of 500m<sup>3</sup>), is **excluded** from the requirement to apply for Environmental Authorisation. It is thus important to note that activities have not proceeded as 'illegal' activities, but rather 'unregistered' activities.

## 5.2 DESCRIPTION OF PROJECT ACTIVITIES

### 5.2.1 DEVELOPMENTAL CONTROLS AND LAYOUT

The Isando Foods (Pty) Ltd facility is situated within the established Isando industrial area in the Ekurhuleni Metropolitan Municipality, Gauteng Province. The property is fully developed and has historically been used for industrial manufacturing and processing activities associated with the production of edible vegetable oils and related products.

The current Section 24G application relates to the retrospective registration/environmental authorisation of listed activities associated primarily with the storage of dangerous goods and associated operational infrastructure that were established without the required Registration of the activities in terms of the GPEMF Registration process. No expansion of the existing operational footprint forms part of this application.

The property is zoned for industrial purposes in accordance with the applicable Ekurhuleni Metropolitan Municipality Town Planning Scheme, and the existing land use is consistent with the surrounding industrial and commercial developments within the Isando industrial precinct.

The Isando Foods facility comprises a fully operational vegetable oil processing complex, including:

- Seed receiving, storage and handling facilities;
- Soya bean crushing and preparation plant;
- Solvent extraction plant;
- Vegetable oil refinery;
- Bulk storage tanks for crude and refined oils, process chemicals and other raw materials;
- Finished product storage and dispatch facilities;
- Boiler plant and associated utilities;
- Reverse Osmosis (RO) water treatment plant;
- Effluent Water Treatment Plant (EWTP);
- Administration offices and staff facilities;
- Internal roads, parking areas, loading and off-loading areas; and
- Ancillary engineering services and infrastructure required for the operation of the facility.

The manufacturing process undertaken at the facility generally consists of seed receiving and storage, seed preparation and crushing, solvent extraction of crude vegetable oil, refining of crude oil into edible products, storage of raw materials and finished products, and distribution of final products. Ancillary operations include steam generation, water treatment, effluent treatment and the storage and handling of process chemicals required for manufacturing.

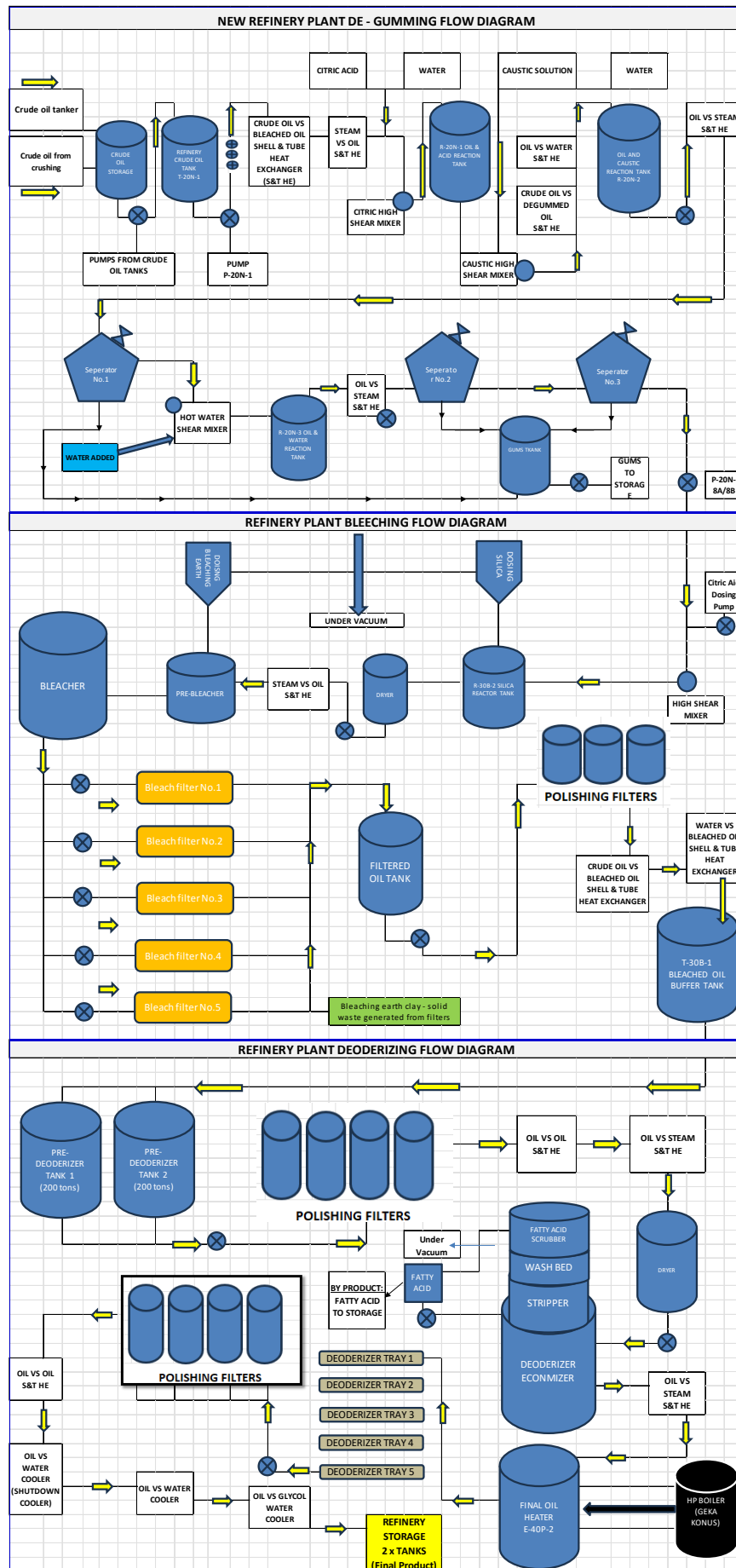


Figure 5-2: Process flow diagram for new refinery on site

The major operational processes are illustrated in the accompanying process flow diagrams, which include:

- Soya Crushing Plant Process Flow;
- Extraction Plant Process Flow;
- Refinery Process Flow;
- Boiler Plant Process Flow;
- Reverse Osmosis (RO) Plant Flow Diagram;
- Effluent Water Treatment Plant (EWTP) Flow Diagram; and
- Overall Site Process Flow.

These process flow diagrams are included in the Appendices.

The existing development also includes extensive hardstand areas, internal access roads, loading bays, parking areas and stormwater infrastructure that support the daily operation of the manufacturing facility. All buildings and operational infrastructure are located within the existing industrial footprint and no development is proposed outside the established site boundary.

The overall site layout, including manufacturing buildings, storage tanks, process areas, utilities, administration buildings and associated infrastructure, is illustrated in Figure 5-1.

### 5.2.2 ROADS

The Isando Foods (Pty) Ltd facility is located within the established Isando industrial precinct in the Ekurhuleni Metropolitan Municipality and is serviced by an existing network of internal roads, loading areas and parking facilities that support the daily operation of the manufacturing plant.

The site includes paved internal access roads that provide safe circulation for employees, visitors, heavy goods vehicles and service vehicles. Dedicated loading and off-loading areas are provided for the delivery of raw materials, including dangerous goods, and for the dispatch of finished products. Parking facilities are available for employees and visitors within the secured facility.

Access to the property is obtained directly from Quality Road, which connects to the surrounding industrial road network via Diesel Street, Furnace Street, Industry Road and Isando Road. The surrounding road network provides efficient access to the regional transport network, including the R24 (Albertina Sisulu Freeway) and the R21, facilitating the movement of raw materials, dangerous goods and finished products to and from the facility.

The Section 24G Rectification Application relates to the continued operation of existing dangerous goods storage infrastructure within an established industrial property. Consequently, no new access roads, parking areas or road upgrades are proposed as part of the application. The existing internal road network and external access routes are considered adequate to accommodate current operational requirements.

### **5.2.3 ELECTRICITY**

The existing municipal electricity supply is sufficient to meet the operational requirements of the Isando Foods manufacturing facility. Electricity is supplied through the existing electrical distribution network and supports the operation of the production plant, administration buildings, bulk storage facilities, utilities and associated infrastructure. The Section 24G Rectification Application does not include any upgrades or extensions to the existing electrical supply infrastructure, and the current electricity supply is considered adequate for the continued operation of the facility.

### **5.2.4 WATER AND SEWER SERVICES**

#### **5.2.4.1 Water**

The Isando Foods (Pty) Ltd facility is connected to the Ekurhuleni Metropolitan Municipality's municipal water supply network, which provides potable water for both domestic and industrial purposes. Water is utilised throughout the facility for manufacturing processes, equipment cleaning, steam generation, cooling systems, sanitation facilities, fire protection and other operational requirements associated with the vegetable oil processing and refining operations.

The existing municipal water supply infrastructure has sufficient capacity to support the continued operation of the facility, including the dangerous goods storage infrastructure forming part of this Section 24G Rectification Application. The proposed rectification application does not require any upgrades or extensions to the existing municipal water supply network.

Internal water reticulation infrastructure distributes water throughout the facility to the various process areas, utilities, administration buildings and ancillary infrastructure.

Water conservation measures are implemented where practicable to promote the efficient use of water resources and minimise unnecessary water consumption. The continued operation of the facility will remain subject to the applicable requirements of the Ekurhuleni Metropolitan Municipality and the National Water Act, 1998 (Act No. 36 of 1998), where applicable.

#### **5.2.4.2 Sewer**

The Isando Foods (Pty) Ltd facility is connected to the Ekurhuleni Metropolitan Municipality's municipal sewer network, which provides for the collection and conveyance of domestic wastewater generated from the administration buildings, ablution facilities, kitchens and other staff amenities.

In addition to domestic wastewater, the manufacturing facility generates process wastewater associated with the production and refining of vegetable oils. Process effluent is managed through the facility's Effluent Water Treatment Plant (EWTP) prior to discharge or reuse, as applicable, in accordance with the facility's operational procedures and the requirements of the relevant regulatory authorities.

The existing sewer and wastewater management infrastructure has been designed to accommodate the operational requirements of the facility and is considered adequate for the continued operation of the manufacturing plant and associated dangerous goods storage infrastructure. The Section 24G Rectification Application does not include the construction of new sewer infrastructure or modifications to the existing wastewater management systems.

The internal sewer reticulation and wastewater management infrastructure are illustrated on the Site Development Plan, while the process flow for the Effluent Water Treatment Plant is included in the Appendix.

All wastewater generated on-site will continue to be managed in accordance with the applicable requirements of the National Water Act, 1998 (Act No. 36 of 1998), the Water Services Act, 1997 (Act No. 108 of 1997), and the applicable by-laws of the Ekurhuleni Metropolitan Municipality.

#### **5.2.5 STORMWATER MANAGEMENT**

The Isando Foods (Pty) Ltd facility is located within the established Isando industrial precinct and is serviced by an existing stormwater management system designed to collect and convey runoff generated from the developed areas of the site. The stormwater infrastructure comprises a network of surface channels, kerbs, catchpits, stormwater inlets and underground pipelines that discharge to the municipal stormwater system. Stormwater runoff from roofs, paved areas, internal roads and parking areas is directed through the existing drainage infrastructure to prevent localised flooding and minimise erosion. The existing stormwater system has been designed to accommodate the operational requirements of the facility and does not form part of the proposed Section 24G Rectification Application.

Given the nature of the activities undertaken on the site, stormwater management is an important operational consideration. Areas associated with the storage and handling of dangerous goods, chemicals and oils are provided with appropriate containment measures, including bunded storage areas and controlled drainage systems, to minimise the risk of contaminated stormwater entering the municipal stormwater network. Spill prevention and response procedures are implemented as part of the facility's operational management system and any contaminated runoff generated within process or storage areas is managed separately from clean stormwater.

The continued operation of the existing stormwater management infrastructure will be undertaken in accordance with the requirements of the Ekurhuleni Metropolitan Municipality and the applicable provisions of the National Water Act, 1998 (Act No. 36 of 1998). Routine inspection and maintenance of the stormwater drainage system will be undertaken to ensure its continued effectiveness and to minimise the potential for pollution of the receiving environment.

Stormwater generated within operational areas where there is a potential for contamination is directed through appropriate pollution control measures, including oil-water separation and containment systems, before discharge in accordance with the facility's stormwater management procedures. This minimises the potential for oils, chemicals or other contaminants to enter the municipal stormwater system or surrounding environment.

### **5.3 TIMEFRAMES**

The Isando Foods (Pty) Ltd facility has been developed incrementally over a number of years as an established industrial manufacturing and processing facility within the Isando industrial area. The site currently comprises production buildings, warehouses, bulk storage tanks, utilities, administration buildings, internal roads, parking areas and associated engineering infrastructure required for the manufacture and distribution of edible vegetable oil products.

The dangerous goods storage facilities and associated infrastructure that form part of this Section 24G Rectification Application are existing operational components of the facility and have been established as part of the historical development and expansion of the manufacturing operations.

The current application does not relate to the construction of new infrastructure or the expansion of the existing operational footprint. Instead, it seeks retrospective registration/environmental authorisation in terms of Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for listed activities that commenced without the required Registration in terms of the GPEMF, 2019.

Following the granting of the necessary authorisation, the facility will continue to operate within its existing footprint, subject to the implementation of the Environmental Management Programme (EMPr).

## 6 ALTERNATIVES

The Appendix 3 of the 2014 EIA Regulations requires that the following information is provided in the EIA Report and includes amongst others:

*3(h) A full description of the process followed to reach the proposed development footprint within the approved site, including:*

*(i) details of the development footprint alternatives considered*

*(iv) the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.*

### 6.1 NATURE OF THE ACTIVITIES

The Isando Foods (Pty) Ltd facility is an established industrial manufacturing and processing facility located within the Isando industrial precinct in the Ekurhuleni Metropolitan Municipality. The primary activities undertaken at the facility include the receipt, storage and processing of oilseeds, the extraction and refining of edible vegetable oils, the storage of raw materials and finished products and the distribution of products to local and regional markets.

The manufacturing process includes seed handling and preparation, crushing, solvent extraction, refining, product storage and dispatch. Supporting operations include steam generation, water treatment, effluent treatment, bulk storage of raw materials and process chemicals, laboratory services, administration, maintenance workshops and logistics operations. These activities are supported by existing internal roads, loading and off-loading facilities, parking areas, utilities and associated engineering infrastructure.

The Section 24G Rectification Application relates to the retrospective environmental authorisation of existing listed activities associated primarily with the storage and handling of dangerous goods required for the operation of the manufacturing facility. No new production processes or expansion beyond the existing operational footprint are proposed as part of this application.

The facility is located within an established industrial area where manufacturing, warehousing and logistics activities are the predominant land uses. The continued operation of the facility is therefore compatible with the existing zoning and surrounding industrial character of the area.

The Isando Foods facility makes an important contribution to the regional economy through the manufacture and distribution of edible vegetable oil products, the creation of employment opportunities, support for local suppliers and service providers, and its contribution to the food manufacturing sector within the Ekurhuleni Metropolitan Municipality and Gauteng Province.

### 6.2 ALTERNATIVES

According to the 2014 EIA Regulations, alternatives are defined as:

*“Different means of meeting the general purpose and requirements of the activity, which may include alternatives to the-*

- (a) property on which or location where the activity is proposed to be undertaken;*
  - (b) type of activity to be undertaken;*
  - (c) design or layout of the activity;*
  - (d) technology to be used in the activity; or*
  - (e) operational aspects of the activity;*
- and includes the option of not implementing the activity”*

The National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) requires that reasonable and feasible alternatives be considered during an environmental impact assessment process. However, in the case of a Section 24G Rectification Application, the listed activities have already commenced and the associated infrastructure has been constructed and is operational. Consequently, the consideration of alternatives is limited, as the purpose of the application is to obtain retrospective environmental authorisation for existing activities rather than to assess a proposed development.

The Isando Foods (Pty) Ltd facility is an established industrial manufacturing complex located within the Isando industrial precinct in the Ekurhuleni Metropolitan Municipality. The facility comprises existing production buildings, processing plants, warehouses, bulk storage tanks, utilities and associated engineering infrastructure that support the manufacture and distribution of edible vegetable oil products. The dangerous goods storage facilities forming part of this application are integral components of the existing manufacturing process and are required for the continued operation of the facility.

**Site Alternatives:** No reasonable or feasible site alternatives have been identified or assessed. The dangerous goods storage infrastructure is intrinsically linked to the existing manufacturing processes and supporting infrastructure already established on the property. Relocating the storage facilities to another property would not be practical or economically feasible, as this would require the duplication of manufacturing infrastructure, bulk services, utilities, logistics systems and supporting engineering works. Furthermore, the site is appropriately located within an established industrial area where industrial manufacturing, storage and logistics activities are the predominant land uses.

**Layout Alternatives:** No layout alternatives have been considered, as the facility is fully developed and operational. The existing layout has been designed to accommodate the manufacturing processes, storage facilities, vehicle circulation, emergency access, utilities and associated operational requirements. The current Section 24G application does not propose any expansion or modification of the existing operational footprint.

**Technology Alternatives:** No technology alternatives form part of this application. The Section 24G Rectification Application relates to the continued operation of existing manufacturing processes and dangerous goods storage infrastructure and does not include the installation of new processing technology

or significant upgrades to existing facilities. Operational improvements and maintenance may continue to be implemented by the applicant as part of normal business operations; however, these do not form part of the current environmental authorisation process.

**No-Go Alternative:** The no-go alternative would entail the refusal of the Section 24G application and the potential discontinuation or removal of the listed activities requiring environmental authorisation. Given that the facility is an established industrial operation that contributes to the regional economy, supports employment and forms part of the existing industrial land use within the Isando precinct, the no-go alternative is not considered to be a reasonable or desirable outcome. Subject to the implementation of the Environmental Management Programme (EMPr) and compliance with the conditions of the Environmental Authorisation, the continued operation of the existing facility is considered the preferred alternative.

Accordingly, the preferred and only viable alternative is the continued operation of the existing Isando Foods facility within its current footprint, together with the implementation of appropriate environmental management measures to minimise and manage potential environmental impacts associated with the listed activity.

## 7 MOTIVATION FOR NEED AND DESIRABILITY

In terms of 3 (f) of Appendix 3 of the EIA Regulations, 2014 (as amended), 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 location is required. In line with this, the consideration of "need and desirability" included consideration of the strategic context of the proposed re-alignment along with the broader societal needs and the public interest.

### 7.1 OVERVIEW

The consideration of need and desirability forms an important component of the environmental impact assessment process and considers whether the proposed activity is required within its strategic planning context, whether it represents an appropriate land use for the area, and whether it serves the broader public interest while promoting sustainable development.

Unlike a conventional environmental authorisation application, the current application is submitted in terms of Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for the retrospective registration/authorisation of listed activities that have already commenced. Consequently, the assessment of need and desirability focuses on the continued operation of an existing industrial facility rather than the suitability of a proposed development.

The Isando Foods (Pty) Ltd facility is an established manufacturing and processing plant located within the Isando industrial precinct in the Ekurhuleni Metropolitan Municipality. The facility manufactures edible vegetable oil products and includes associated processing infrastructure, bulk storage facilities, warehouses, utilities and dangerous goods storage areas required to support its operations.

The property is situated within an established industrial area where manufacturing, warehousing, logistics and commercial activities are the predominant land uses. The existing operations are therefore compatible with the surrounding land uses and the strategic planning objectives of the Ekurhuleni Metropolitan Municipality, which seek to support economic development and industrial growth within designated industrial nodes.

The Isando industrial area occupies a strategically important location within Gauteng, with direct access to the regional road network, including the R24 (Albertina Sisulu Freeway) and the R21, and is situated in close proximity to OR Tambo International Airport. This location provides efficient access to suppliers, customers and distribution networks, supporting the movement of raw materials and finished products throughout South Africa and neighbouring countries.

The continued operation of the facility contributes to the regional and provincial economy through:

- the manufacture and supply of edible vegetable oil products;
- supporting food security through the production of products used within the food manufacturing sector;
- providing direct and indirect employment opportunities;

- supporting local suppliers, contractors and transport service providers;
- contributing to industrial investment within the Ekurhuleni Metropolitan Municipality; and
- contributing to the local and national economy through continued industrial production.

In addition, Isando Foods forms part of the Willowton Group, one of South Africa's leading edible oil manufacturers and the country's largest sunflower seed crusher. The Group plays a significant role in the national food manufacturing sector through the production and supply of edible oils and related food products that are distributed throughout South Africa and neighbouring countries. The continued operation of the Isando facility therefore supports not only local and regional economic activity but also an important component of the national food supply chain and broader food manufacturing industry.

The Section 24G application does not propose the development of a new industrial facility or the expansion of the existing operational footprint. Instead, it seeks to regularise existing listed activities associated with dangerous goods storage that form an integral part of the manufacturing process. The continued operation of these facilities is necessary for the safe storage and handling of raw materials and process chemicals required during production.

From an environmental perspective, the proposed rectification application enables the continued operation of the facility under an approved Registration/Environmental Authorisation supported by an Environmental Management Programme (EMPr). This will ensure that appropriate environmental management measures are implemented, monitored and maintained throughout the operational life of the facility, thereby reducing potential environmental risks associated with the storage and handling of dangerous goods.

The continued operation of the existing Isando Foods facility will not result in the loss of undeveloped land, agricultural land, biodiversity priority areas or significant ecological resources, as the property has been historically developed for industrial purposes and is situated within an established industrial precinct. The application therefore represents the regularisation of an existing land use rather than the introduction of a new development into a previously undeveloped environment.

Accordingly, the continued operation of the Isando Foods facility is considered both needed and desirable, as it supports regional economic development, employment, industrial productivity and the food manufacturing sector while enabling the existing listed activities to be regulated under the applicable environmental legislative framework.

## 8 PUBLIC PARTICIPATION

### 8.1 OBJECTIVE AND PURPOSE OF PUBLIC PARTICIPATION

The purpose of the public participation process is to provide information regarding the project to any potentially interested and/or affected person for use and consideration throughout the environmental assessment process. The information usually involves a combination of the technical project scope, environmental attributes and sensitivities, cultural and heritage aspects as well as socio-economic factors that may be potentially beneficial or problematic to various role players.

The dissemination of such information is intended to assist the public with understanding how the project and/or development may impact them and the environment in either a positive and/or negative manner, and especially where impacts are determined or perceived as significantly high, how such impacts may be influenced by project changes (layout or design aspects) or management measures may be implemented to reduce or minimise the significance of any identified impacts.

As a registered I&AP, members of the public of any affiliation are awarded the opportunity to remain informed of the steps, actions and decisions made within the environmental impact assessment process and are able to actively participate by reviewing all information provided by the EAP to the I&AP's in a reasonable period in order to provide comments, objections, suggestions or any other information that will assist the project to develop in a favourable for all manner or contribute to the competent authority's knowledge in order to make an informed decision on the application for environmental authorisation.

### 8.2 PROTECTION OF PERSONAL INFORMATION ACT, 2013

The Protection of Personal Information (POPI) Act, 2013 (Act No. 4 of 2013), aims to promote the protection to personal information processed by public and private bodies. Section 14 of the Constitution of the Republic of South Africa, 1996, provides that everyone has the right to privacy, this includes the right to protection of personal information.

This Public Participation Process has been carried out in line with the POPI Act. All Personal information with regards to I&APs has been recorded on a project specific I&AP database. However, Personal Information collected by Prism EMS will not be made available to the public or Authorities unless consent is given by registered I&APs. Instead, Personal Information on this database as well as personal information contained in any correspondence between Prism EMS and I&APs, has been blanked out for public review as well as review by the Authorities. Each I&AP has been provided with a pseudonym (I&AP 01, I&AP 02, etc.,). Registered I&APs were given the opportunity to provide consent for their details to be used or to remain anonymous.

Personal Information collected by Prism EMS will not be made available to the public or Authorities unless consent is given by registered I&APs.

## 8.3 PRELIMINARY NOTIFICATION

The public participation process commenced with identifying and notifying all potential Interested and Affected Parties (I&AP's). Background information documents and comment forms were provided as a basic source of information or notices were viewed and potential interested and/or affected members of the public were invited to register as I&AP's for the remainder of the Section 24G rectification process.

### 8.3.1 IDENTIFIED I&AP'S

In accordance with the requirements of the Environmental Impact Assessment Regulations, 2014 (as amended) and the Section 24G Regulations, a database of Interested and Affected Parties (I&APs) was compiled for the Isando Foods (Pty) Ltd Section 24G Rectification Application.

The following stakeholders were identified and notified during the public participation process:

- Gauteng Department of Environment (GDEnv) (Competent Authority);
- Department of Water and Sanitation (DWS);
- Ekurhuleni Metropolitan Municipality;
- South African Heritage Resources Agency (SAHRA), where applicable;
- Gauteng Provincial Heritage Resources Authority (PHRA-G), where applicable;
- Gauteng Department of Roads and Transport (GDRT), where applicable;
- Relevant utility service providers, including Eskom, where applicable;
- Adjacent and neighbouring property owners and occupiers;
- Businesses operating within the Isando Industrial Area;
- The relevant Ward Councillor(s);
- Organs of State with a jurisdictional interest in the application; and
- Any other Interested and Affected Parties who requested registration during the public participation process.
- Afgri Animal Feeds
- Truck Unit Repairs and Exchange CC
- CTS Spares
- Pandrol SA
- Evapco
- Bakers

Refer to Appendix 13.5.1 for a detailed list of the interested and/or affected members of the public that were notified and/or subsequently registered as an I&AP.

### 8.3.2 NEWSPAPER NOTICE

A notice was published in the Star Newspaper on the **3<sup>rd</sup> of October 2025** for the initial public participation process.

Refer to Appendix 13.5.3 for proof of the newspaper notices.

### 8.3.3 SITE NOTICE

Five site notices were placed on **1<sup>st</sup> of October 2025** (notice period: **3<sup>rd</sup> of October 2025 to 23<sup>rd</sup> of October 2025**) around the site at the following locations:

- The first site notice was placed on the boundary of the site on Furnace Street - 26° 8'36.62"S, 28°12'30.16"E
- The second site notice was placed at Gate D on Furnace Street - 26° 8'37.65"S, 28°12'32.26"E
- The third site notice as placed on the Willowton Group neighbouring property, across Quality road - 26° 8'39.48"S, 28°12'34.00"E
- The fourth site notice was placed at the entrance of Isando Foods on Quality Road - 26° 8'42.32"S, 28°12'31.38"E
- The fifth site notice was placed at the boundary of the property on Quality Road - 26° 8'46.99"S, 28°12'28.39"E

Refer to Appendix 13.5.2 for proof of the notices placed on site.

### 8.3.4 WRITTEN NOTIFICATIONS

A Background Information Document (BID) was compiled and emailed to adjacent landowners and businesses on the **3<sup>rd</sup> of October 2025**. A copy of the document was also emailed to Organs of State and other I&APs on the database. A copy of the BID is provided in Appendix 13.5.2.3.

Refer to Appendix 13.5.4.2 for proof of the Written Notifications undertaken as part of the initial notification.

### 8.3.5 COMMENTS RAISED BY I&AP'S DURING THE PRELIMINARY NOTICE PUBLIC PARTICIPATION PERIOD

The comments received during the pre-application notification period are summarised in the Comments and Responses Report attached in Appendix 13.5.5.

## 8.4 NOTIFICATION AS PART OF EIR REVIEW

The Section 24G directive was received on 25 June 2026, which directed the applicant to conduct further Public Participation as indicated below.

### 8.4.1 NEWSPAPER NOTICE

A notice was published in the Star Newspaper on **16 September 2026**.

Refer to Appendix 13.5.2.1 for proof of the newspaper notices (to follow).

### 8.4.2 SITE NOTICE

Five site notices were placed on **14 September 2026** around the development site at the following locations:

- Two at the entrance of the site, along Quality Road.

- Two notices along Furnace Street.
- One notice at Gate 2 along Quality Road.

Refer to Appendix 13.5.2.2 for proof of the notices placed on site.

#### 8.4.3 WRITTEN NOTIFICATIONS

The surrounding landowners and/or occupiers and organs of state (listed in Appendix 13.5.1) were notified in writing via e-mail on **16 September 2026** and were issued with a copy of the Background Information Document (BID) to provide further information on the project. A copy of the BID is provided in Appendix 13.5.2.3.

Refer to Appendix 13.5.2.4 for proof of the Written Notifications undertaken as part of the EIR phase notification.

#### 8.4.4 COMMENTS RAISED BY I&AP'S DURING THE EIR NOTICE PERIOD

The comments received during the pre-application notification period will be summarised in the Comments and Responses Report attached in Appendix 13.5.5.

### 8.5 IMPACT ASSESSMENT PHASE COMMENT PERIOD

Based on the directive, which was received on 25 June 2026, the applicant was directed to compile an Environmental Impact Report (EIR) (*this document*) within four months from the receipt of the directive.

In order to ensure that all I&APs has an opportunity to review and comment on the EIA Report, all registered I&APs (as identified as part of the process described in Section 8.3. above) were notified of the public review of the EIA Report.

The review period provided for review and comment was between **16 September 2026 and 16 October 2026**.

As part of this review, electronic copies of the report were made available to all registered Interested and Affected Parties (I&APS). All relevant Organs of State will receive an electronic copy for review. These were uploaded to the necessary portals as required by the necessary Department.

The report is hosted on the website [www.prismems.co.za](http://www.prismems.co.za).

All comments received during this period will be added to the Comments and Responses Report and submitted to the GDEnv as part of the final submission.



## 8.6 FINAL EIA REPORT AND GDEnv DECISION

All comments received during the comment period discussed above will be considered and incorporated into the Final EIA Report and documented in the Comments and Response Report.

The Final EIA Report will be submitted to GDEnv for decision.

## 8.7 OUTCOME OF THE DECISION

Registered I&AP's will be notified in writing of the outcome of the Department's decision within 12 days of the decision. The notification will include details of the process and timeframes in which to appeal the outcome of the decision made by the competent authority, GDEnv.

## 8.8 TIMEFRAMES

An overview of the Section 24G Rectification process undertaken to date is provided in Table 8-1.

**Table 8-1: Timeframes for the Section 24G Rectification process.**

| Responsible Role Player                            | Milestone Tasks                                                                                   | Required Time Period | Proposed Timeframes       | Status  |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------|----------------------|---------------------------|---------|
| <b>Preliminary Notification Phase</b>              |                                                                                                   |                      |                           |         |
| <b>PPP</b>                                         | Written, Newspaper, Site Notices & BID's                                                          | 30 days              | 16 September 2026         | ✓       |
| <b>Lodge Section 24G Rectification Application</b> |                                                                                                   |                      |                           |         |
| <b>EAP</b>                                         | Prepare and submit Section 24G rectification application form to the competent authority (GDEnv). | N/A                  | 1 July 2026               | ✓       |
| <b>Site evaluation</b>                             |                                                                                                   |                      |                           |         |
| <b>EAP &amp; GDEnv</b>                             | GDEnv does a site verification inspection.                                                        | N/A                  | 24 August 2026            | ✓       |
| <b>Receive Directive and Specialist Studies</b>    |                                                                                                   |                      |                           |         |
| <b>GDEnv</b>                                       | Receive directive from GDEnv specifying way forward.                                              | N/A                  | 25 June 2026              | ✓       |
| <b>Specialist Studies</b>                          | Site Visits and Reporting                                                                         | N/A                  | July 2026 – November 2026 | ✓       |
| <b>Impact Assessment Phase</b>                     |                                                                                                   |                      |                           |         |
| <b>EAP</b>                                         | Compile EIA Report                                                                                | N/A                  | August 2026               | ✓       |
| <b>PPP</b>                                         | I&AP Notification and Comment on EIA Report                                                       | 30 days              | September - October 2026  | Current |
| <b>EAP</b>                                         | Review / Incorporate Comments                                                                     | 2 days               | October 2026              | Ongoing |
| <b>GDEnv</b>                                       | Review EIA Report and Provide Decision                                                            | 90 days              | November 2026             |         |
| <b>PPP</b>                                         | Notification of Decision / Appeal                                                                 |                      | February 2027             |         |

## 9 SUMMARY OF SPECIALIST STUDIES AND TECHNICAL REPORTS

The Competent Authority (GDEnv) directed the applicant to compile an Environmental Impact Report which contains a description of the environment that has been affected by the activity and the manner in which the physical, biological, social, economic and cultural aspects have been and may further be affected by the activity.

As part of the Directive, it was requested that a detailed Storm Water Management Plan (SWMP), Waste Management Plan (WMP), and Emergency Response Plan (ERP) be compiled by an appropriate specialist, in order to inform the EIR.

The EIA Regulations, 2014 (as amended) define a specialist as: *“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.”*

The following technical studies have been undertaken and are summarised below where applicable:

- Stormwater management plan;
- Waste Management Plan (WMP)
- Emergency Response Plan (ERP)
- Stack Monitoring Plan

## 9.1 STORMWATER MANAGEMENT PLAN

The Isando Foods facility is an established industrial site with extensive areas of buildings, paved surfaces, access roads and operational areas. Stormwater generated from these hard surfaces has the potential to transport pollutants and sediments and may influence the flow regime and geomorphology of the receiving aquatic environment, particularly the wetland and drainage features associated with the site. Effective stormwater management is therefore required to prevent uncontrolled runoff, erosion, sedimentation and the mobilisation of pollutants into surrounding aquatic resources.

In particular, the current Impact Assessment utilised available information regarding the existing site layout, drainage characteristics, wetland environment and existing stormwater management measures for the assessment of:

- Changes in flow regime; and
- Changes to geomorphology.

A comprehensive Stormwater Management Plan is currently being prepared for the Isando Foods facility. Isando Foods is in the process of appointing suitably qualified specialists to undertake a topographic assessment of the entire property. The detailed topographic information will be used to establish existing drainage patterns, catchment areas, flow paths, levels and stormwater infrastructure and will form the basis for the development of the Stormwater Management Plan.

As the topographic assessment and subsequent Stormwater Management Plan are still in progress, the completed plan was not available for inclusion in the Draft EIR at the time of circulation. The findings and recommendations of the completed Stormwater Management Plan will, however, be incorporated into the Final EIR for submission to GDEnv.

### 9.1.1 KEY FINDINGS

#### 9.1.1.1 Terms of Reference

The Stormwater Management Plan will address the collection, conveyance, attenuation and management of stormwater generated across the Isando Foods property. The assessment will consider the existing site topography, stormwater flow paths, hard-surface areas, existing stormwater infrastructure and the receiving aquatic environment.

The topographic assessment currently being undertaken will provide the specialist with the information required to identify areas where stormwater management infrastructure or additional controls may be required.

#### 9.1.1.2 Current Site Conditions and Assessment

Based on the information currently available, the following is noted:

- The Isando Foods property forms part of an established and extensively transformed industrial area.

- The site contains extensive areas of buildings, paved surfaces, roads and operational areas, resulting in the generation of stormwater runoff.
- Existing stormwater infrastructure and drainage measures are present on the property; however, a comprehensive assessment of the entire stormwater network and site-wide drainage characteristics is required.
- Potential stormwater-related impacts include changes to flow regime, erosion, sedimentation, geomorphology and water quality.
- The detailed topographic assessment will be used to determine the existing and future stormwater flow paths and to identify areas requiring additional intervention.
- The completed Stormwater Management Plan will inform the appropriate design and implementation of stormwater controls across the site.

#### **9.1.1.3 Conclusion and Recommendations**

The preparation of a comprehensive Stormwater Management Plan is considered an important requirement for ensuring that stormwater generated from the Isando Foods facility is appropriately managed and that potential impacts to the surrounding aquatic environment are minimised.

The following commitments are therefore made:

- A suitably qualified specialist will complete a topographic assessment of the entire Isando Foods property.
- The topographic assessment will be used as the basis for preparing a comprehensive Stormwater Management Plan.
- The Stormwater Management Plan will identify existing drainage patterns, stormwater infrastructure, flow paths, catchment areas and areas requiring additional stormwater management measures.
- The completed plan will specifically consider measures to prevent uncontrolled discharge, erosion, sedimentation and pollution of the wetland and downstream aquatic environment.
- Stormwater management measures identified through the completed specialist assessment will be incorporated into the relevant environmental management measures and implemented by Isando Foods.
- The final Stormwater Management Plan will be retained as part of the facility's environmental management documentation and made available to the relevant authorities upon request.

The completed Stormwater Management Plan will be submitted to GDEnv as an outstanding supporting document once the topographic assessment and specialist assessment have been completed, subject to any requirements or timeframe specified by the Competent Authority (anticipated as part of the final EIR submission).

This approach is preferable for the S24G FEIR because it does not imply that a SWMP already exists, while demonstrating to GDEnv that the outstanding technical information has been identified, that Isando Foods is actively procuring the required specialist work, and that the eventual plan will directly address the aquatic-resource impacts identified through the FEIR.

## 9.2 WASTE MANAGEMENT PLAN

Waste generated from the Isando Foods facility is associated primarily with the ongoing manufacturing, refinery, boiler, bottling, engineering, maintenance and general site activities. The Waste Management Procedure establishes controls for the identification, segregation, storage, handling, recycling, transportation and disposal of the various waste streams generated at the facility. The procedure is intended to minimise the environmental impacts associated with waste generation and is implemented in accordance with applicable waste-management legislation, including the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), relevant waste classification and landfill disposal requirements, and the Ekurhuleni Metropolitan Municipality Solid Waste By-laws.

In particular, the current Impact Assessment utilised information from the Waste Management Procedure for the assessment of:

- Domestic waste;
- Construction waste;
- Effluent waste; and
- Hazardous waste and associated pollution risks.

The Waste Management Procedure identifies and separates the principal waste streams generated at the facility, including cardboard, plastic bottles, shrink-wrap, boiler coal ash, winterised waste, bleaching clay, scrap steel and general waste. Several waste streams are recycled, reused or recovered where practicable, while inherently hazardous materials such as spent bleaching earth and winterised waste are managed through controlled storage and disposal/rework arrangements.

### 9.2.1 KEY FINDINGS

#### 9.2.1.1 Terms of Reference

The Waste Management Procedure provides a framework for managing the handling, storage and disposal of solid and other waste generated at the Isando Foods facility. It identifies the waste-generating activities and waste streams, specifies appropriate storage and segregation requirements, and establishes controls for the transportation and disposal of hazardous and general waste.

#### 9.2.1.2 Results

The following is noted:

- **Hazardous waste:** Spent bleaching earth generated during the refining process is classified as inherently hazardous due to its potential for spontaneous combustion and is removed to an appropriate hazardous-material rework/disposal facility. Winterised waste is similarly managed through controlled rework and disposal arrangements, with safe-disposal certificates retained.
- **Recyclable waste:** Cardboard, plastic bottles, labels, plastic wrapping and scrap steel are separated and sent for recycling where practicable.

- **Boiler ash:** Coal ash generated by the boilers is collected in dedicated skips and removed for disposal, with opportunities for beneficial reuse through sale to brick manufacturers.
- **General waste:** General waste generated through normal plant operations, administration, sweeping, cleaning and employee activities is collected and removed from the site regularly.
- **Waste storage:** Waste is stored in designated, categorised containers, with 7-ton steel bins used where appropriate. Bins are required to be maintained in good condition, covered to prevent windblown waste, and stored within designated areas under roof where practicable. Waste storage areas are cleaned and maintained regularly.
- **Hazardous waste controls:** Hazardous waste storage areas are demarcated and, where possible, access controlled. Containers are clearly labelled according to their hazard rating, bunding is provided where required, and employees are trained in the identification and handling of hazardous waste.
- **Transportation and disposal:** Hazardous waste transporters are appointed in writing and must comply with the applicable requirements for the transportation of hazardous materials. Waste manifests, safety data sheets and disposal certificates are retained as evidence of appropriate waste management and disposal.
- **Incident management:** The procedure provides for the reporting and management of environmental incidents, including notification to the relevant authorities where required and the assessment and remediation of contaminated areas following an incident.

### 9.2.2 CONCLUSION AND RECOMMENDATIONS

The Waste Management Procedure provides an established framework for managing waste generated by the Isando Foods facility and supports the segregation, recycling, recovery, controlled storage and appropriate disposal of waste streams. Continued implementation of the procedure, together with the mitigation measures contained in the EMPr, will reduce the potential for waste-related pollution, nuisance impacts and risks to surrounding soil and water resources.

The following measures should continue to be implemented:

- Maintain separation of general, recyclable and hazardous waste streams;
- Store hazardous waste in clearly labelled, appropriately contained and designated areas;
- Ensure waste containers are maintained, covered and removed before excessive accumulation occurs;
- Maintain records of waste quantities, manifests and safe-disposal certificates;
- Use appropriately authorised/licensed service providers for hazardous waste transportation and disposal;
- Continue employee training and environmental awareness regarding waste handling;
- Maintain good housekeeping and clean waste-storage areas regularly; and
- Ensure that any waste-related environmental incident is immediately contained, reported and appropriately remediated.

## 9.3 EMERGENCY RESPONSE PLAN

Emergency preparedness and response at the Isando Foods facility are governed by the **Crisis Management Procedure**, which establishes the framework for the prevention, management, communication and recovery of major safety, health and environmental incidents. The procedure defines a crisis as an event that threatens the future of the company through significant impacts on employee health and safety, the environment, business operations, financial performance or company reputation. The procedure establishes a structured Crisis Management Committee, emergency communication protocols, response responsibilities, evacuation procedures, external stakeholder engagement requirements and media-management processes.

In particular, the current Impact Assessment utilised information from the Crisis Management Procedure for the assessment of:

- Fire and explosion risks;
- Chemical-release incidents, including hexane and ammonia releases;
- Major environmental incidents and spill-response measures;
- Occupational health and safety emergencies, including fatalities and serious injuries; and
- Emergency preparedness, evacuation, communication and incident-response capabilities.

The Crisis Management Procedure identifies the principal emergency scenarios that may arise at the facility, including fire, explosion, LPG incidents, hexane-related incidents, ammonia gas leaks, bomb threats, major environmental pollution incidents, fatalities or serious injuries, incidents at neighbouring facilities and security-related threats such as hijackings. The procedure establishes defined notification and escalation requirements, specifies the responsibilities of the Crisis Management Team, and provides for coordination with emergency services, regulatory authorities, neighbouring industries and corporate management. The procedure also incorporates crisis communication, media liaison and post-incident recovery measures to minimise the consequences of emergency events.

### 9.3.1 KEY FINDINGS

#### 9.3.1.1 Terms of Reference

The Crisis Management Procedure provides a comprehensive framework for the identification, management and communication of significant emergency events that may affect the Isando Foods facility. The procedure identifies foreseeable emergency scenarios, establishes emergency response structures and responsibilities, details internal and external communication protocols, and provides guidance for incident escalation, evacuation, environmental protection, stakeholder communication and business recovery.

#### 9.3.1.2 Results

The following is noted:

- **Crisis management structure:** A formal Crisis Management Committee is established, led by the General Manager as Crisis Controller, supported by technical advisors, SHE personnel, engineering personnel, security personnel and emergency coordinators. Defined responsibilities and communication channels are provided to ensure coordinated incident management.
- **Emergency preparedness:** The procedure requires the maintenance of emergency communication systems, designated crisis-control facilities, call-out procedures and emergency documentation to support effective response to major incidents. A dedicated crisis control room is identified and equipped with communication and operational resources.
- **Fire and explosion response:** Detailed response actions are provided for fires, explosions, LPG incidents, dust explosions and hexane-related events. These include alarm activation, emergency-service notification, evacuation procedures, incident command arrangements and coordination with external responders.
- **Hazardous chemical incidents:** Specific procedures are established for hexane fires and ammonia gas leaks, including plant isolation, emergency evacuation, notification of neighbouring facilities where necessary, and engagement with fire and emergency services.
- **Environmental incident management:** The procedure includes provisions for the management of significant environmental incidents involving the loss of containment of hazardous substances. Emergency response measures include spill containment, deployment of spill-response equipment, notification of specialist service providers and relevant authorities, remediation planning and incident close-out procedures.
- **Occupational health and safety emergencies:** Procedures are provided for managing fatalities and serious injuries, including emergency notification, communication with regulatory authorities, employee communication, incident investigation and the provision of employee support services where required.
- **Stakeholder and authority communication:** The procedure requires communication with emergency services, regulatory authorities, neighbouring properties, government bodies and corporate management, ensuring that significant incidents are reported and managed appropriately.
- **Media and public communication:** Formal media-management protocols are established, including spokesperson designation, media-response procedures, information-verification requirements and stakeholder communication processes to ensure that accurate information is communicated during a crisis.
- **Incident recovery and business continuity:** The procedure distinguishes between short-term emergency response actions and longer-term recovery measures, including restoration of operations, stakeholder engagement, investigation, lessons learned and implementation of corrective actions.

### 9.3.2 CONCLUSION AND RECOMMENDATIONS

The Crisis Management Procedure provides an established framework for managing major safety, health, environmental and operational emergencies at the Isando Foods facility. The procedure supports incident preparedness, rapid emergency response, coordinated communication, environmental protection, employee safety and business recovery through clearly defined responsibilities and response protocols. Continued implementation of the procedure, together with the mitigation and emergency-response measures contained in the EMPr, will reduce the potential consequences of fires, explosions, hazardous-

material releases, environmental incidents and other emergency situations, thereby protecting employees, neighbouring land users and the receiving environment.

## 9.4 STACK EMISSION MONITORING PLAN

The Isando Foods facility operates four coal-fired boilers, each equipped with an individual stack and baghouse abatement equipment. The boilers are classified as controlled emitters under Section 23 of the National Environmental Management: Air Quality Act (Act No. 39 of 2004). The principal regulated pollutants associated with the boilers are particulate matter (PM) and sulphur dioxide (SO<sub>2</sub>).

In particular, the current Impact Assessment utilised information from the Stack Emission Monitoring Reports for the assessment of:

- Point-source atmospheric emissions from the four coal-fired boilers;
- Particulate matter (PM) emissions; and
- Sulphur dioxide (SO<sub>2</sub>) emissions.

The stack monitoring programme provides annual measurements of emissions from Boilers 1–4, as well as the Geka Connus Boiler, and enables the results to be compared against the applicable emission limits and the emission-reduction targets established for the Highveld Priority Area. The ERMP confirms that annual stack monitoring is undertaken under normal operating conditions, with three sampling runs of three hours each, with compliance assessed against the average result of the three tests.

### 9.4.1 KEY FINDINGS

#### 9.4.1.1 Terms of Reference

The stack emission monitoring is undertaken to determine the concentrations of regulated pollutants emitted from the four coal-fired boiler stacks, and Geka Connus Boilers, and to assess compliance with the applicable emission limits. The results are also used to identify emission trends and inform emission-reduction and management measures contained within the ERMP.

#### 9.4.1.2 Results

The following is noted:

- **Boiler 1:** PM concentrations have remained below the applicable emission limit, although an increasing trend has been observed in recent monitoring results. The most recent SO<sub>2</sub> result was below the applicable 2030 emission-reduction target.
- **Boiler 2:** PM emissions remained relatively stable between the 2023 and 2024 monitoring periods and below the applicable emission limit. The spike in emissions during the 2024 re-do monitoring period were linked to a batch of very poor-quality coal received at the time which resulted in higher production of emissions. SO<sub>2</sub> emissions remained below both the current emission limit and the proposed 2030 target, with a notable reduction between the monitoring periods.
- **Boiler 3:** Concentrations for both PM and SO<sub>2</sub> show significant increases between the 2023 and 2024 monitoring periods. While the emissions remain below the current limit, the scale of the increase

warrants closer operational review and corrective action to prevent continued escalation and ensure future compliance.

- **Boiler 4:** SO<sub>2</sub> emissions recorded during the 2024 and 2025 monitoring period remain comfortably below the applicable limits and the proposed 2030 targets. PM concentrations were measured at 348,45mg/Nm<sup>3</sup> during 2024, well above the current emission limit. This value decreased drastically in the 2025 monitoring period and should be monitored closely to ensure there are no spikes in emissions. SO<sub>2</sub> concentrations.
- **Geka Connus Boilers:** The recorded concentrations of PM and SO<sub>2</sub> during the 2025 monitoring period were both well below limits and reduction targets.
- The applicable current PM emission limits are 250mg/Nm<sup>3</sup> for Boilers 1–3 and 120mg/Nm<sup>3</sup> for Boiler 4, while the SO<sub>2</sub> limit is 2,800mg/Nm<sup>3</sup> for all four boilers. The Geka Connus Boilers have a limit of 100mg/Nm<sup>3</sup> for PM and 500mg/Nm<sup>3</sup> for SO<sub>2</sub>. The ERMP establishes proposed 2030 targets of 150mg/Nm<sup>3</sup> PM and 1,680mg/Nm<sup>3</sup> SO<sub>2</sub> for Boilers 1–3, and 72mg/Nm<sup>3</sup> PM and 1,680mg/Nm<sup>3</sup> SO<sub>2</sub> for Boiler 4.
- The ERMP identifies maintenance of the baghouse filters, ducting and filter bags as key controls for stack emissions. Annual stack monitoring and monthly maintenance are specified as ongoing management measures.

Additional emission-management measures include controlling coal quality and feed rates, maintaining coal-storage controls, and maintaining a regular cleaning programme for the grit arrestors.

#### 9.4.2 CONCLUSION AND RECOMMENDATIONS

The stack emission monitoring results indicate that the four boiler stacks and Geka Connus Boilers have generally remained within the applicable current emission limits, although elevated and increasing emission trends require continued monitoring and proactive management. The monitoring results therefore provide an important baseline for assessing the facility's ability to achieve the applicable Highveld Priority Area emission-reduction targets.

The following measures should continue to be implemented:

- Conduct annual stack emission monitoring for all boilers;
- Maintain and service the baghouse abatement systems and replace filter bags when required;
- Maintain the integrity of associated ducting and emission-control equipment;
- Monitor coal quality, including sulphur content and relevant fuel characteristics;
- Maintain appropriate boiler operating conditions and feed rates;
- Maintain the grit-arrestor cleaning programme;
- Investigate significant increases or deviations in monitored emissions and implement corrective actions where necessary; and
- Retain stack-monitoring and maintenance records to demonstrate ongoing emission management and performance.

The full Stack Emission Monitoring Reports are included as separate supporting documents/appendices to the ERMP and should be read together with the ERMP and the atmospheric-emissions impact assessment.

## 10 IMPACT ASSESSMENT

### 10.1 OVERALL IMPACT ASSESSMENT

This section focuses on the potential environmental impacts that is and could be caused by the development.

An 'impact' refers to the change to the environment resulting from an environmental aspect (or activity), whether desirable or undesirable. An impact may be the direct or indirect consequence of an activity. From a qualitative perspective, impacts were identified as follows:

- Impacts associated with listed activities contained in GN 983-985 of 4 December 2014 (Listing Notice, 1, 2 and 3) [as amended], for which authorisation has been applied for as part of the Section 24G application;
- An assessment of the project activities and components; and
- Issues highlighted by I&APs (both the general public and authorities).

In addition to the above more qualitative descriptions of impacts, a more detailed quantitative assessment of impacts is also provided and specifically considers impacts to the receiving environment (Chapter 4) and the findings from Specialist Studies (Chapter 9). This quantitative impact assessment uses the impact assessment methodology discussed in the Plan of Study for the EIA. A summary of the methodology is provided below.

### 10.2 IMPACT ASSESSMENT METHODOLOGY

The standard methodology used in the environmental impact assessment to determine the significance rating of the potential impacts are outlined in this section.

#### 10.2.1 SIGNIFICANCE

The **significance** of an impact is defined as the combination of the **consequence** of the impact occurring and the **probability** that the impact will occur. The nature and type of impact may be direct or indirect and may also be positive or negative, refer to Table 10-1 for the specific definitions.

**Table 10-1: Nature and Type of Impact.**

| Nature and Type of Impact: |            |                                                                                                                                                                                                                                 |
|----------------------------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IMPACT                     | Direct     | Impacts that are caused directly by the activity and generally occur at the same time and place as the activity                                                                                                                 |
|                            | Indirect   | Indirect or induced changes that may occur because of the activity. These include all impacts that do not manifest immediately when the activity is undertaken, or which occur at a different place as a result of the activity |
|                            | Cumulative | Those impacts associated with the activity which add to, or interact synergistically with existing impacts of past or existing activities, and include direct or indirect impacts which accumulate over time and space          |
|                            | Positive   | Impacts affect the environment in such a way that natural, cultural and / or social functions and processes will benefit significantly, and includes neutral impacts (those that are not considered to be negative              |
|                            | Negative   | Impacts affect the environment in such a way that natural, cultural and/or social functions and processes will be comprised                                                                                                     |

Table 10-2 presents the defined criteria used to determine the **consequence** of the impact occurring which incorporates the extent, duration and intensity (severity) of the impact.

**Table 10-2: Consequence of the Impact Occurring.**

| CONSEQUENCE | Extent of Impact:                |                                                                                                                                                                     |
|-------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|             | Site                             | Impact is limited to the site and immediate surroundings, within the study site boundary or property (immobile impacts)                                             |
|             | Neighbouring                     | Impact extends across the site boundary to adjacent properties (mobile impacts)                                                                                     |
|             | Local                            | Impact occurs within a 5km radius of the site                                                                                                                       |
|             | Regional                         | Impact occurs within a provincial boundary                                                                                                                          |
|             | National                         | Impact occurs across one or more provincial boundaries                                                                                                              |
|             | Duration of Impact:              |                                                                                                                                                                     |
|             | Incidental                       | The impact will cease almost immediately (within weeks) if the activity is stopped, or may occur during isolated or sporadic incidences                             |
|             | Short-term                       | The impact is limited to the construction phase, or the impact will cease within 1 - 2 years if the activity is stopped                                             |
|             | Medium-term                      | The impact will cease within 5 years if the activity is stopped                                                                                                     |
|             | Long-term                        | The impact will cease after the operational life of the activity, either by natural processes or by human intervention                                              |
|             | Permanent                        | Where mitigation either by natural process or by human intervention will not occur in such a way or in such a time span that the impact can be considered transient |
|             | Intensity or Severity of Impact: |                                                                                                                                                                     |
|             | Low                              | Impacts affect the environment in such a way that natural, cultural and/or social functions and processes are not affected                                          |
|             | Low-Medium                       | Impacts affect the environment in such a way that natural, cultural and/or social functions and processes are modified insignificantly                              |
|             | Medium                           | Impacts affect the environment in such a way that natural, cultural and/or social functions and processes are altered                                               |
|             | Medium-High                      | Impacts affect the environment in such a way that natural, cultural and / or social functions and processes are severely altered                                    |
|             | High                             | Impacts affect the environment in such a way that natural, cultural and / or social functions and processes will permanently cease                                  |

The probability of the impact occurring is the likelihood of the impacts actually occurring and is determined based on the classification provided in Table 10-3.

**Table 10-3: Probability and Confidence of Impact Prediction.**

| PROBABILITY | Probability of Potential Impact Occurrence: |                                                                                                         |
|-------------|---------------------------------------------|---------------------------------------------------------------------------------------------------------|
|             | Improbable                                  | The possibility of the impact materialising is very low either because of design or historic experience |
|             | Possible                                    | The possibility of the impact materialising is low either because of design or historic experience      |
|             | Likely                                      | There is a possibility that the impact will occur                                                       |
|             | Highly Likely                               | There is a distinct possibility that the impact will occur                                              |
|             | Definite                                    | The impact will occur regardless of any prevention measures                                             |

The **significance** of the impact is determined by considering the consequence and probability without taking into account any mitigation or management measures and is then ranked according to the ratings listed in Table 10-4. The level of confidence associated with the impact prediction is also considered as low, medium or high and is described in Table 10-5.

**Table 10-4: Significance Rating of the Impact.**

| SIGNIFICANCE | Significance Ratings: |                                                                                                                                                                                                                                             |
|--------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              | None                  | There is no impact at all - not even a very low impact on a party or system                                                                                                                                                                 |
|              | Low                   | Neither environmental nor social and cultural receptors will be adversely affected by the impact. Management measures are usually not provided for low impacts                                                                              |
|              | Low-Medium            | Management measures are usually encouraged to ensure that the impacts remain of Low-Medium significance. Management measures may be proposed to ensure that the significance ranking remains low-medium                                     |
|              | Medium                | Natural, cultural and/or social functions and processes are altered by the activities, and management measures must be provided to reduce the significance rating                                                                           |
|              | Medium-High           | Natural, cultural and/or social functions and processes are altered significantly by the activities, although management measures may still be feasible                                                                                     |
|              | High                  | Natural, cultural, and/or social functions and processes are adversely affected by the activities. The precautionary approach will be adopted for all high significant impacts and all possible measures must be taken to reduce the impact |

**Table 10-5: Level of Confidence of the Impact Prediction.**

| CONFIDENCE | Level of Confidence in the Impact Prediction: |                                                                                                                      |
|------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
|            | Low                                           | Less than 40% sure of impact prediction due to gaps in specialist knowledge and/or availability of information       |
|            | Medium                                        | Between 40 and 70% sure of impact prediction due to limited specialist knowledge and/or availability of information  |
|            | High                                          | Greater than 70% sure of impact prediction due to outcome of specialist knowledge and/or availability of information |

Once significance rating has been determined for each impact, management and mitigation measures must be determined for all impacts that have a significance ranking of Medium and higher in order to attempt to reduce the level of significance that the impact may reflect.

The EIA Regulations, 2014 specifically require a description is provided of the degree to which these impacts:

- can be reversed;
- may cause irreplaceable loss of resources; and
- can be avoided, managed or mitigated.

Based on the proposed mitigation measures the EAP will determine a mitigation efficiency (Table 10-6) whereby the initial significance is re-evaluated and ranked again to effect a significance that incorporates the mitigation based on its effectiveness. The overall significance is then re-ranked, and a final significance rating is determined.

**Table 10-6: Mitigation Efficiency.**

| MITIGATION EFFICIENCY | Mitigation Efficiency |                                                                                                                                                   |
|-----------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | None                  | Not applicable                                                                                                                                    |
|                       | Very Low              | Where the significance rating stays the same, but where mitigation will reduce the intensity of the impact. Positive impacts will remain the same |
|                       | Low                   | Where the significance rating reduces by one level, after mitigation                                                                              |
|                       | Medium                | Where the significance rating reduces by two levels, after mitigation                                                                             |
|                       | High                  | Where the significance rating reduces by three levels, after mitigation                                                                           |
|                       | Very High             | Where the significance rating reduces by more than three levels, after mitigation                                                                 |

The reversibility is directly proportional the “Loss of Resource” where no loss of resource is experienced, the impact is completely reversible; where a substantial “Loss of resource” is experienced there is a medium degree of reversibility; and an irreversible impact relates to a complete loss of resources, i.e. irreplaceable (Table 10-7).

**Table 10-7: Degree of Reversibility and Loss of Resources.**

| DEGREE REVERSABILITY & LOSS OF RESOURCES | Loss of Resources:   |                                                                                                                                                                                                          |
|------------------------------------------|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          | <b>No Loss</b>       | No loss of social, cultural and/or ecological resource(s) are experienced. Positive impacts will not experience resource loss                                                                            |
|                                          | <b>Minimal</b>       | The activity results in an insignificant or partial loss of social, cultural and/or ecological resource(s)                                                                                               |
|                                          | <b>Partial</b>       | The activity results in a significant loss of social, cultural and/or ecological resource(s)                                                                                                             |
|                                          | <b>Irreplaceable</b> | The activity results in the complete and irreplaceable social, cultural and/or ecological loss of resource(s)                                                                                            |
|                                          | Reversibility:       |                                                                                                                                                                                                          |
|                                          | <b>Irreversible</b>  | Impacts on natural, cultural and/or social functions and processes are irreversible to the pre-impacted state in such a way that the application of resources will not cause any degree of reversibility |
|                                          | <b>Medium Degree</b> | Impacts on natural, cultural and/or social functions and processes are partially reversible to the pre-impacted state if less than 50% resources are applied                                             |
|                                          | <b>High Degree</b>   | Impacts on natural, cultural and/or social functions and processes are partially reversible to the pre-impacted state if more than 50% resources are applied                                             |
|                                          | <b>Reversible</b>    | Impacts on natural, cultural and/or social functions and processes are fully reversible to the pre-impacted state if adequate resources are applied                                                      |

## 10.2.2 CUMULATIVE IMPACTS

It is important to assess the natural environment using a systems approach that will consider the cumulative impact of various actions. Cumulative impact refers to the impact on the environment, which results from the incremental impact of the actions when added to other past, present and reasonably foreseeable future actions regardless of what agencies or persons undertake such actions. Cumulative impacts can result from individually minor, but collectively significant actions or activities taking place over a period. Cumulative effects can take place frequently and over a period that the effects cannot be assimilated by the environment.

## 10.3 QUALITATIVE DISCUSSION OF IMPACTS

### 10.3.1 IMPACTS ASSOCIATED WITH LISTED ACTIVITIES

As mentioned, the project requires authorisation for certain activities listed in the EIA Regulations, 2014 [as amended], which serve as triggers for the environmental assessment process. The potential impacts associated with the key listed activities are broadly stated in Table 10-8.

**Table 10-8: Potential Impacts Associated with Listed Activities.**

| Listing Notice                                           | Activity | Description of Listed Activity                                                                                                                                                                                     | Potential Impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>NEMA: Listing Notice 1 (require Basic Assessment)</i> |          |                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| GN R 327<br>4<br>December<br>2014 (as<br>amended)        | 51       | <i>The expansion and related operation of facilities for the storage, or storage and handling, of a dangerous good, where the capacity of such storage facility will be expanded by more than 80 cubic metres.</i> | The storage and handling of dangerous goods may result in soil, surface water and groundwater contamination due to accidental spills or leaks, increased risks to human health and safety from exposure, fire or explosion, contamination of stormwater, generation of hazardous waste, and traffic-related risks associated with the transportation of dangerous goods. These impacts can be effectively minimised through appropriate containment measures, operational controls, emergency response procedures and implementation of the Environmental Management Programme (EMPr). |

**10.3.2 ENVIRONMENTAL ACTIVITIES**

To understand the impacts related to the project it is necessary to unpack the activities associated with the project life cycle. The main project activities as well as high-level environmental activities undertaken in the various project phases are listed in Table 10-9.

It is important to note that the development was initially established in 1996 and therefore, the phases prior to the operational phase have already been completed to date.

The Isando Foods facility has a long-established history of oilseed processing and industrial activity, with operations at the site predating its acquisition by Willowton in the late 1990s. The site was previously operated by Premier Foods and comprised a number of oilseed processing facilities, including sunflower and cotton seed crushing, solvent extraction, oil refining and hydrogenation. Following acquisition, the facility underwent a programme of refurbishment, recommissioning and progressive expansion, including upgrades to the solvent extraction and desolventisation processes and replacement of process equipment. More recently, additional solvent extraction capacity was introduced in response to increased production requirements and customer demand. A summary of the historical development and major operational changes at the site is provided in Table 10-9.

**Table 10-9: Historical Background and Development of the Isando Foods Facility.**

| Period / Stage            | Development Activity                   | Description / Capacity                                                                                                                                   |
|---------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Prior to late 1995</b> | Previous site ownership and operations | The site was previously owned and operated by Premier Foods. The facility was subsequently shut down prior to its acquisition by Willowton in late 1995. |
| <b>Late 1995</b>          | Acquisition of site                    | Willowton purchased the site from Premier Foods following the shutdown of the facility.                                                                  |

| Period / Stage                                | Development Activity                          | Description / Capacity                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Original sunflower crushing operations</b> | Sunflower crushing facility                   | The facility included a sunflower crushing operation with a total rated capacity of approximately 1,700 tonnes per day (TPD), comprising approximately 700 TPD pre-pressing capacity and 1,000 TPD solvent extraction capacity.                                                                                                                                                 |
| <b>Original cotton seed operations</b>        | Cotton seed crushing and solvent extraction   | The facility included a cotton seed crushing operation with a reported capacity of approximately 1,200 TPD, including approximately 600 TPD pre-pressing capacity and an additional 600 TPD pre-pressing/solvent extraction component, as understood from the available historical information. The cotton seed solvent extraction plant was subsequently partially dismantled. |
| <b>Original refining operations</b>           | Oil refining plant                            | A refining facility with a rated capacity of approximately 500 TPD was used for processing sunflower oil.                                                                                                                                                                                                                                                                       |
| <b>Original hydrogenation operations</b>      | Hydrogenation plant                           | A hydrogenation plant with a rated capacity of approximately 500 TPD was established to harden sunflower oil. Hydrogen was supplied in tubes and trailers for use in the process.                                                                                                                                                                                               |
| <b>Original sunflower solvent plant</b>       | Underground solvent storage                   | Four underground tanks were installed in association with the sunflower solvent plant, comprising two hexane tanks and two miscella tanks.                                                                                                                                                                                                                                      |
| <b>Original cotton seed solvent plant</b>     | Solvent storage                               | Three tanks were associated with the cotton seed solvent plant, comprising two underground hexane tanks and one above-ground miscella tank.                                                                                                                                                                                                                                     |
| <b>January 1996</b>                           | Plant recommissioning commenced               | Following acquisition, work commenced to prepare the existing plant for recommissioning.                                                                                                                                                                                                                                                                                        |
| <b>1996</b>                                   | Dismantling and site preparation              | The remaining cotton seed solvent plant was partially dismantled to facilitate preparation of the site for a proposed 1,500 TPD soybean solvent extraction plant. Two underground solvent tanks associated with the former cotton seed plant were retained with the intention of potentially using them for the proposed soybean plant.                                         |
| <b>1996</b>                                   | Plant recommissioning                         | The available information indicates that the plant was upgraded over a period of approximately four months, after which the facility was recommissioned.                                                                                                                                                                                                                        |
| <b>1996</b>                                   | Solvent extraction plant fire and replacement | Approximately two months after recommissioning, the solvent plant extractor experienced a fire. The affected extractor was subsequently replaced with a 1,000 TPD Europa Crown extractor.                                                                                                                                                                                       |

| Period / Stage                             | Development Activity                         | Description / Capacity                                                                                                                                                                                                                                                                                 |
|--------------------------------------------|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subsequent operational period              | Process equipment upgrades                   | Over subsequent years, process equipment was progressively upgraded. In particular, mild-steel distillation equipment was replaced with stainless-steel equipment to improve the process infrastructure.                                                                                               |
| Subsequent operational period              | Desolventiser upgrade                        | The original desolventiser was replaced with a more efficient DTDC (Desolventiser-Toaster-Dryer-Cooler) system.                                                                                                                                                                                        |
| Subsequent operational period              | Crushing capacity                            | Following the various upgrades and expansions, the facility developed into a modernised crushing operation capable of processing approximately 1,000 TPD of sunflower seed or 1,000 TPD of soybeans, depending on operational requirements.                                                            |
| Subsequent years                           | Flexible solvent extraction operations       | For several years, the 1,000 TPD solvent extraction plant was operated using soybeans and sunflower seed according to market demand, with the available information indicating periods of approximately two weeks on soybean processing followed by two weeks on sunflower processing.                 |
| Operational constraints prior to 2023/2024 | Meal supply and customer demand              | The alternating use of the solvent plant for soybean and sunflower processing resulted in increasing customer complaints relating to the availability and supply of meal products.                                                                                                                     |
| 2023/2024                                  | Expansion of solvent extraction capacity     | In response to increasing customer demand, the facility acquired a 1,500 TPD solvent extraction plant (SEP), increasing the facility's solvent extraction capability and improving its ability to meet customer demand.                                                                                |
| Historical period – date to be confirmed   | Solvent/miscella tank failure                | One of the miscella/solvent tanks developed a leak. Following the incident, the facility operated with three of the four tanks available for use. The exact date of the tank failure should be confirmed from Isando Foods' historical records before finalisation of the FEIR.                        |
| Following tank decommissioning             | Current solvent tank configuration           | Based on the information provided, of the six historical solvent tanks, two were decommissioned, one developed a leak and the remaining three tanks remained in use. The exact status, location and capacity of each tank should be confirmed against the current site layout and engineering records. |
| 2024                                       | Capital expenditure for further SEP capacity | Capital expenditure was made available in 2024 for the purchase of a further 1,500 TPD solvent extraction plant.                                                                                                                                                                                       |

| Period / Stage            | Development Activity | Description / Capacity                                                                                                                                                                                                                                                                                                |
|---------------------------|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Current operations</b> | Soybean processing   | The facility currently operates with soybean processing capacity of approximately 1,500 TPD and/or 1,000 TPD, according to the historical information provided. The precise current operating configuration and rated capacities should be confirmed against current production records and equipment specifications. |

**Table 10-10: Project Activities.**

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Pre-Construction</b> | <b>Project Activities</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                         | Detailed layouts and services designs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                         | Detailed geotechnical investigations (where necessary)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                         | Procurement process for Contractors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                         | Procurement of other necessary construction materials                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                         | Site plan to be developed by Contractor for approval by ECO and Project Manager.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                         | Site specific method statements are compiled and approved                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                         | <b>Environmental Activities</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                         | Appointment of Environmental Control Officer (ECO).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                         | Permits if heritage resources are to be impacted on.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                         | Marking of sensitive areas (wetland and wetland buffers etc.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                         | Relocation of Species of conservation importance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                         | Environmental Awareness Training                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Construction</b>     | <b>Project Activities</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                         | Appointments and site camp set up: <ul style="list-style-type: none"> <li>Set up site camp with temporary offices and administrative facilities;</li> <li>Set up ablutions;</li> <li>Set up access control, security; signage and lighting;</li> <li>General materials storage and laydown areas;</li> <li>Construction employment;</li> <li>Change-houses, chemical toilets and showering facilities (linked to conservancy tanks – removal of contents by exhauster vehicle and disposal at permitted facility);</li> <li>Temporary waste storage areas; these shall be established and managed in accordance with EMPr requirements.</li> </ul>                   |
|                         | Sourcing of construction materials and equipment: <ul style="list-style-type: none"> <li>All bulk materials (aggregate, cement, steel etc.) will be sourced from existing lawful commercial sources; there will be no direct mining, harvesting or extraction of natural resources.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                       |
|                         | Clearance of Vegetation <ul style="list-style-type: none"> <li>Clearance of vegetation in line with the requirements of the EMPr</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                         | Excavation and earthworks <ul style="list-style-type: none"> <li>Removal of existing surfacing material where necessary (concrete, asphalt etc.) which could involve excavation below ground level;</li> <li>Levelling and compaction using heavy machinery / earthmoving equipment;</li> <li>Potential for excavations and trenching in order to lay of below ground level equipment (cables, pipes, sumps, drainage etc.);</li> <li>Potential for excavation dewatering in the event of water-table interception;</li> <li>Use of general mechanical equipment within construction areas (generators, cutting and welding equipment, compressors etc.).</li> </ul> |
|                         | <b>Environmental Activities</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                         | Diligent compliance monitoring of the construction EMPr, environmental authorisation and other relevant environmental legislation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                         | Continued consultation with I&APs (as required).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                         | Environmental awareness creation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                         | <b>Project Activities</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Operation</b>        | Operation of facilities – edible vegetable oil manufacturing and processing facility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                         | Operation of services (roads, pipelines)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                         | Maintenance of infrastructure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                         | <b>Environmental Activities</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                         | Diligent compliance monitoring of the operational EMPr, environmental authorisation and other relevant environmental legislation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                         | Environmental awareness creation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

### 10.3.3 ENVIRONMENTAL ASPECTS

Environmental aspects are regarded as those components of an organisation's activities, products and services that are likely to interact with the environment and cause an impact. The following environmental

aspects have been identified for the development which are linked to the project activities (note that only high-level aspects are provided in Table 10-10).

**Table 10-11: Environmental Aspects.**

|                         |                                                                                               |
|-------------------------|-----------------------------------------------------------------------------------------------|
| <b>Pre-Construction</b> | <b>Aspects</b>                                                                                |
|                         | Inadequate consultation with landowners/occupiers of land                                     |
|                         | Inadequate environmental and compliance monitoring                                            |
|                         | Poor construction site planning and layout                                                    |
|                         | Inadequate design of distribution warehouse and services infrastructure                       |
|                         | Absence of relevant permits (e.g. for species of conservation importance, heritage resources) |
|                         | Lack of barricading of sensitive environmental features                                       |
| <b>Construction</b>     | <b>Aspects</b>                                                                                |
|                         | Poor waste management                                                                         |
|                         | Absence of ablution facilities                                                                |
|                         | Inadequate consultation with I&APs                                                            |
|                         | Not utilising local labour                                                                    |
|                         | Inadequate environmental and compliance monitoring                                            |
|                         | Lack of environmental awareness creation                                                      |
|                         | Indiscriminate site clearing                                                                  |
|                         | Poor site establishment                                                                       |
|                         | Inadequate oil spill response                                                                 |
| <b>Operation</b>        | <b>Aspects</b>                                                                                |
|                         | Inadequate consultation with I&APs                                                            |
|                         | Not utilising local labour                                                                    |
|                         | Inadequate environmental and compliance monitoring                                            |
|                         | Inadequate fire response                                                                      |
|                         | Lack of environmental awareness creation                                                      |
|                         | Lack of maintenance                                                                           |
|                         | Inadequate management of waste and wastewater                                                 |
|                         | Water conservation/re-use activities not implemented.                                         |

#### 10.3.4 ISSUES RAISED BY ENVIRONMENTAL AUTHORITIES AND IAPS

During the initial public participation process, comments were received from both environmental authorities and Interested and Affected Parties (I&APs). The primary issues raised related to the potential environmental and safety risks associated with the storage and handling of dangerous goods, including the potential for fire and explosion, soil and groundwater contamination, air emissions, stormwater management, transportation of dangerous goods, emergency response procedures, bund integrity, environmental monitoring, and future expansion of the facility. Requests were also made for clarification on groundwater monitoring, hazardous materials transport routes, and the availability of supporting technical assessments. These comments were considered by the Environmental Assessment Practitioner (EAP) and the applicant, with responses provided through the Comments and Responses Report. Where necessary, additional supporting documentation was included or referenced, including the Major Hazard Installation (MHI) Risk Assessment, Dangerous Goods Transportation Routes Assessment, Environmental Management Programme (EMPr), Crisis Management Plan, bund inspection records and environmental monitoring programme. The public participation process ensured that stakeholder concerns were adequately considered and incorporated into the final Environmental Impact Report and associated management measures.

Any comments received during the public review period of the EIR (this document) will be included in the final report before being submitted to GDEnv.

## **10.4 QUANTITATIVE IMPACT ASSESSMENT**

### **10.4.1 CONSTRUCTION IMPACTS**

The directive received for this project is in terms of Section 24G (1) of the National Environmental Management Act 107 of 1998, as amended. The construction impacts are therefore not applicable due to the fact that the construction phase was completed a number of years ago, and the site is fully operational.

Table 10-12: Summary of Quantitative Impact Assessment – Construction Phase.

|                                 | IMPACTS  |                                                                                                          |                    |                |                | RANKING WITHOUT MITIGATION   | IMPLEMENTATION OF MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                          | RANKING WITH MITIGATION | DEGREE REVERSABILITY & LOSS OF RESOURCE (AFTER MITIGATION) |                |
|---------------------------------|----------|----------------------------------------------------------------------------------------------------------|--------------------|----------------|----------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------|------------------------------------------------------------|----------------|
|                                 | Nature   | Description                                                                                              | Alternative        | Cumulative     | Type           | Significance (A + B + C) X P | Description and/or Mitigation and Management Measures (if applicable)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Mitigation Effectiveness | Significance            | Loss Resources of                                          | Reversibility  |
| <b>CONSTRUCTION PHASE</b>       |          |                                                                                                          |                    |                |                |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                          |                         |                                                            |                |
| <b>Atmospheric Emissions</b>    | Negative | Dust emissions                                                                                           | Development layout | Yes            | Direct         | Low                          | Construction activities associated with the establishment of the relevant infrastructure was undertaken in a manner that minimised dust generation. Exposed areas were kept to the minimum practicable extent; vehicle speeds were controlled; disturbed surfaces were dampened where required; and construction materials were appropriately contained. Good housekeeping was maintained and visible dust emissions addressed promptly.                                                                                                                                                                                                                                                                                       | High                     | Low                     | Partial                                                    | High Degree    |
|                                 | Negative | Emissions from vehicles and equipment (CO <sub>2</sub> , NO <sub>x</sub> , SO <sub>x</sub> , VOC's etc.) | Development layout | Yes            | Direct         | Low                          | Construction vehicles and equipment were maintained in good working order and serviced in accordance with manufacturer requirements. Unnecessary idling was avoided. Vehicles and equipment complied with applicable emission and roadworthiness requirements. Where practicable, construction activities were planned to minimise unnecessary vehicle movements.                                                                                                                                                                                                                                                                                                                                                              | High                     | Low                     | Partial                                                    | High Degree    |
|                                 | Negative | Noise                                                                                                    | Development layout | No             | Direct         | Low                          | Construction activities were restricted to approved daytime working hours. Equipment was properly maintained and fitted with appropriate noise-control measures where available. Unnecessary idling and unnecessary use of horns was avoided. Nearby receptors were considered when planning particularly noisy activities. Any noise complaints were recorded and investigated through the complaints-management process.                                                                                                                                                                                                                                                                                                     | High                     | Low                     | Partial                                                    | High Degree    |
| <b>Impacts to Surface Water</b> | Negative | Water quality                                                                                            | Development layout | Yes            | Direct         | Low                          | Potential deterioration of surface- and/or groundwater quality due to sediment-laden runoff, accidental spills of fuels, oils or chemicals and mobilisation of pollutants during construction activities. Construction activities were restricted to the required footprint; hazardous substances were appropriately stored and contained; erosion and sediment controls implemented where required; and clean and contaminated stormwater kept separate. Spill kits were available and all spills immediately contained, cleaned and appropriately disposed of. Any water-quality incident was recorded, investigated and followed by corrective action.                                                                      | High                     | Low                     | Partial                                                    | High Degree    |
|                                 |          |                                                                                                          | No-Go Option       | Not Applicable | Not Applicable | None                         | None required. However, it should be noted that the Wetlands identified are highly transformed and impacted by historical and ongoing anthropogenic activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Not Applicable           | None                    | Not Applicable                                             | Not Applicable |
|                                 | Negative | Flow regime                                                                                              | Development layout | No             | Indirect       | Low                          | Construction activities may have temporarily altered surface-water flow through earthworks, soil compaction, changes to drainage pathways, obstruction of stormwater routes and increased runoff from disturbed or hardened areas. Construction was restricted to the required footprint, existing drainage pathways maintained, and stormwater infrastructure kept clear of obstructions. Erosion and sediment controls were implemented where required, and disturbed or altered drainage areas rehabilitated following construction. Any permanent obstruction, diversion or alteration of a watercourse was assessed for compliance with the applicable requirements of the National Water Act.                            | High                     | Low                     | Partial                                                    | High Degree    |
|                                 |          |                                                                                                          | No-Go Option       | Not Applicable | Not Applicable | None                         | None required. However, it should be noted that the Wetlands identified are highly transformed and impacted by historical and ongoing anthropogenic activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Not Applicable           | None                    | Not Applicable                                             | Not Applicable |
|                                 | Negative | Habitat                                                                                                  | Development layout | Yes            | Indirect       | Low                          | Construction activities may have resulted in temporary disturbance or degradation of surface-water habitat through vegetation clearance, soil disturbance, sedimentation, altered drainage, pollution and encroachment into watercourses or drainage features. Construction activities were restricted to the required footprint, with aquatic/riparian vegetation and drainage pathways protected. Erosion and sediment controls were implemented where required, and pollutants prevented from entering surface-water resources. Disturbed areas no longer required were rehabilitated, while any residual impacts to aquatic habitat were assessed and addressed through appropriate corrective or rehabilitation measures. | High                     | Low                     | Partial                                                    | High Degree    |

|                        |          |                     |                    |     |          |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |           |     |         |             |
|------------------------|----------|---------------------|--------------------|-----|----------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----|---------|-------------|
|                        | Negative | Biota               | Development layout | No  | Indirect | Low | Construction activities may have resulted in temporary disturbance to aquatic biota through sedimentation, deterioration of water quality, altered surface-water flow, habitat disturbance and accidental pollution incidents. Construction activities were restricted to the required footprint, with aquatic habitats and flow pathways protected. Erosion and sediment controls were implemented where required, and pollutants prevented from entering surface-water resources. Spills were immediately contained and remediated. Disturbed areas were rehabilitated, and any residual impacts to aquatic biota addressed through appropriate corrective or ecological rehabilitation measures.                                                                                                                                            | High      | Low | Partial | High Degree |
|                        | Negative | Geomorphology       | Development layout | No  | Direct   | Low | Construction activities may have resulted in temporary or permanent alteration of surface-water geomorphology through earthworks, excavation, infilling, changes to drainage pathways, increased runoff, erosion and sediment deposition. Construction activities were restricted to the required footprint, with natural drainage pathways protected and erosion and sediment controls implemented where required. Exposed areas were stabilised and any altered drainage features or watercourses assessed for appropriate rehabilitation. Activities resulting in alteration of the bed, banks, course or characteristics of a watercourse were assessed against the applicable requirements of the National Water Act.                                                                                                                     | High      | Low | Partial | High Degree |
| Impacts to Groundwater | Negative | Groundwater quality | Development layout | Yes | Direct   | Low | Fuels, oils and hazardous substances were stored and handled in appropriately banded/contained areas. Construction vehicles and equipment were inspected for leaks. Refuelling and maintenance occurred in designated areas with appropriate spill protection. Spill kits were readily available. Any spill was immediately contained, cleaned up and removed for appropriate disposal. Significant incidents were reported in accordance with the applicable incident-reporting requirements.                                                                                                                                                                                                                                                                                                                                                 | High      | Low | Partial | High Degree |
| Waste Generation       | Negative | Domestic waste      | Development layout | Yes | Direct   | Low | Construction activities may have generated domestic/general waste such as food waste, packaging, paper and plastics. Poor waste management could result in littering, odour, pests and pollution. Adequate covered and labelled waste bins were provided, with general, recyclable, construction and hazardous wastes appropriately segregated. Waste was removed regularly by an appropriately authorised service provider and disposed of at an appropriately authorised facility. Waste generation was minimised through reuse and recycling where practicable, and disposal records maintained. Any waste remaining from historical construction activities was removed as part of the S24G corrective-management measures.                                                                                                                | Medium    | Low | Partial | High Degree |
|                        | Negative | Construction waste  | Development layout | Yes | Direct   | Low | Construction activities may have generated rubble, excess soil, concrete, metals, wood, packaging and other construction waste. Poor management could result in littering, visual impacts, obstruction of drainage infrastructure and soil or water pollution. Construction waste was appropriately segregated, stored in designated areas and reused or recycled where practicable. Waste requiring disposal was removed by an appropriately authorised service provider and disposed of at an appropriately authorised facility, with disposal records retained. Any historical construction waste remaining on site was identified and removed as part of the S24G corrective-management measures, with affected areas rehabilitated where necessary.                                                                                       | Medium    | Low | Partial | High Degree |
|                        | Negative | Effluent waste      | Development layout | Yes | Direct   | Low | Construction activities may have generated effluent from ablution facilities, equipment washing and other construction-related activities. Poor management could result in contamination of soil, stormwater and surface- or groundwater resources. Adequate ablution facilities and appropriate wastewater collection systems were provided, with effluent managed through authorised systems. Washing of vehicles and equipment was undertaken in designated, contained areas, and untreated effluent must not enter stormwater systems or water resources. Effluent was removed and disposed of through appropriately authorised service providers/facilities, with records maintained. Any residual impacts associated with historical effluent disposal was identified and remediated as part of the S24G corrective-management measures. | Very High | Low | Partial | High Degree |
|                        | Negative | Hazardous waste     | Development layout | Yes | Direct   | Low | Hazardous waste was segregated from general waste, stored in suitable labelled and sealed containers and managed in accordance with applicable waste-management requirements. Waste was removed by an appropriately authorised waste contractor and disposal documentation retained. Temporary storage areas were appropriately managed to prevent releases to the environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Medium    | Low | Partial | High Degree |

|                         |          |                                                                                            |                    |     |        |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |        |            |             |               |
|-------------------------|----------|--------------------------------------------------------------------------------------------|--------------------|-----|--------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------|-------------|---------------|
| Soil Alteration         | Negative | Loss of topsoil                                                                            | Development layout | Yes | Direct | Low | Construction activities may have resulted in loss or disturbance of topsoil through vegetation clearing, excavation, grading, vehicle movement and soil compaction. Further disturbance was restricted to the required footprint. Where earthworks were undertaken, topsoil was stripped separately, appropriately stockpiled and protected from erosion and contamination for subsequent reuse. Exposed areas were stabilised and rehabilitated following construction. Any residual areas affected by historical loss or degradation of topsoil were identified and rehabilitated as part of the S24G corrective-management measures.                                                                                                                                | Low    | Low-Medium | Partial     | High Degree   |
|                         | Negative | Loss of land capability                                                                    | Development layout | Yes | Direct | Low | Construction activities may have resulted in loss of land capability through vegetation clearance, topsoil loss, soil compaction, excavation, grading, contamination and conversion of land to infrastructure. Further disturbance was restricted to the required footprint, with topsoil appropriately managed and soils protected from contamination and erosion. Temporarily disturbed areas were decompacted, regraded, topsoiled and revegetated where required. Areas where historical construction activities have resulted in reduced land capability were identified and rehabilitated as part of the S24G corrective-management measures.                                                                                                                    | Low    | Low        | Partial     | High Degree   |
|                         | Negative | Alteration of topography                                                                   | Development layout | No  | Direct | Low | Construction activities may have resulted in alteration of site topography through excavation, filling, grading, levelling and construction of infrastructure. These changes may have affected natural drainage, stormwater runoff and erosion potential. Further earthworks were restricted to the required footprint, with exposed and disturbed areas stabilised and appropriately rehabilitated. Stormwater infrastructure was maintained to manage altered runoff patterns and prevent erosion or uncontrolled discharge. Areas where historical construction activities have resulted in unnecessary or unstable topographical alteration were identified and, where practicable, regraded and rehabilitated as part of the S24G corrective-management measures. | Low    | Low        | Partial     | High Degree   |
|                         | Negative | Soil pollution                                                                             | Development layout | Yes | Direct | Low | Construction activities may have resulted in soil pollution through spills or leaks of fuels, oils, chemicals and wastewater, as well as poor management of hazardous and construction waste. Hazardous substances must be stored in appropriately contained areas, with refuelling and maintenance undertaken in designated areas. Spill kits were available and spills immediately contained and remediated. Contaminated soil was identified, assessed and appropriately remediated or removed where required, with contaminated waste disposed of at an appropriately authorised facility. Any residual soil contamination associated with historical construction activities was addressed through the S24G corrective and rehabilitation measures.               | High   | Low        | Substantial | Medium Degree |
| Resource Consumption    | Negative | Electricity consumption                                                                    | Development layout | Yes | Direct | Low | Electricity consumption was monitored where practicable. Energy-efficient equipment was used where feasible, and equipment was switched off when not required. Generators, where used, were properly maintained and operated efficiently.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Medium | Low        | Partial     | High Degree   |
|                         | Negative | Water consumption                                                                          | Development layout | Yes | Direct | Low | Water use was limited to that reasonably required for construction activities and dust suppression. Water-saving practices were implemented and unnecessary wastage avoided. Dust suppression was applied according to actual site conditions rather than continuously were unnecessary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Medium | Low        | Partial     | High Degree   |
|                         | Negative | Fuel consumption                                                                           | Development layout | Yes | Direct | Low | Fuel consumption was monitored where practicable. Vehicles and equipment were properly maintained, unnecessary idling avoided and movements planned efficiently. Fuel was stored and handled in designated areas with appropriate spill-control measures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Medium | Low        | Partial     | High Degree   |
|                         | Negative | Raw materials consumption                                                                  | Development layout | Yes | Direct | Low | Materials were ordered and used efficiently to minimise wastage. Excess materials were stored appropriately for reuse where practicable. Opportunities for recycling and reuse of suitable construction materials were considered.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Medium | Low        | Partial     | High Degree   |
| Effects on Biodiversity | Negative | Loss of Habitat due to loss of vegetation - Clearing due to digging and laying foundations | Development layout | Yes | Direct | Low | Construction activities may have resulted in the loss of vegetation and associated terrestrial habitat through site clearing excavation and the establishment of foundations. Further vegetation disturbance was restricted to the required development footprint, with remaining vegetation protected from unnecessary disturbance. Temporarily disturbed areas were regraded, topsoiled and revegetated where required, using appropriate indigenous species where practicable. Areas affected by historical vegetation clearing were assessed for residual habitat impacts and rehabilitated where necessary as part of the S24G corrective-management measures.                                                                                                    | Medium | Low        | No Loss     | Reversible    |

|  |  |                                                                                 |                    |                |                |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |      |                |                |
|--|--|---------------------------------------------------------------------------------|--------------------|----------------|----------------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------|----------------|----------------|
|  |  | Loss of Habitat due to loss of vegetation - Construction camps & lay down areas | Development layout | Yes            | Direct         | Low  | The establishment of construction camps and laydown areas may have resulted in vegetation clearing, soil compaction and temporary loss or fragmentation of terrestrial habitat. Future temporary areas were located within previously disturbed areas where practicable and clearly demarcated to prevent unnecessary vegetation loss. Following completion of activities, temporary infrastructure and materials were removed, disturbed areas decompacted, regraded, topsoiled and revegetated where required. Areas historically affected by construction camps and laydown areas were assessed for residual habitat impacts and rehabilitated where necessary as part of the S24G corrective-management measures.                                                                                                                                                                                 | Medium         | Low  | No Loss        | Reversible     |
|  |  |                                                                                 | No-Go Option       | Not Applicable | Not Applicable | None | None required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Not Applicable | None | Not Applicable | Not Applicable |
|  |  | Loss of Habitat due to loss of vegetation - Stochastic events such as fire      | Development layout | Yes            | Direct         | Low  | Construction activities may have increased the risk of accidental fires associated with hot works, machinery, electrical equipment and combustible materials, potentially resulting in vegetation loss and associated habitat disturbance. Fire prevention measures, appropriate fire-fighting equipment, hot-work controls and emergency procedures were implemented. Uncontrolled burning was prohibited. Any areas historically affected by fire were assessed for residual vegetation and habitat loss, erosion and invasive species, and rehabilitated where necessary through appropriate soil stabilisation and revegetation as part of the S24G corrective-management measures.                                                                                                                                                                                                               | High           | Low  | No Loss        | Reversible     |
|  |  |                                                                                 | No-Go Option       | Not Applicable | Not Applicable | None | None required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Not Applicable | None | Not Applicable | Not Applicable |
|  |  | Loss of Habitat due to loss of vegetation - Clearing due to access roads        | Development layout | Yes            | Direct         | Low  | Construction of access roads may have resulted in vegetation clearing, soil disturbance and fragmentation or loss of terrestrial habitat. Access was restricted to designated road corridors, with existing roads and previously disturbed areas used where practicable to minimise further vegetation loss. Appropriate stormwater and erosion controls were maintained along access roads. Areas associated with temporary or redundant access roads were decompacted, regraded, topsoiled and revegetated where required. Historical areas affected by access-road construction were assessed for residual habitat loss and rehabilitated where necessary as part of the S24G corrective-management measures.                                                                                                                                                                                      | High           | Low  | No Loss        | Reversible     |
|  |  |                                                                                 |                    |                |                |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |      |                |                |
|  |  | Direct mortality of fauna - Staff or construction workers poaching and hunting  | Development layout | Yes            | Direct         | Low  | The presence of construction personnel and temporary construction areas may have increased the risk of direct fauna mortality through unauthorised hunting, poaching, trapping or capturing of wildlife. Hunting, trapping, snaring, capturing or killing of fauna by employees, contractors and visitors was strictly prohibited. Personnel received environmental induction and toolbox training regarding biodiversity protection and applicable legislation. Site inspections and security measures were implemented to identify and prevent illegal hunting activities. Any fauna-related incidents were recorded, investigated and appropriately reported. Where historical construction activities resulted in evidence of poaching or fauna mortality, the residual impact was assessed and appropriate corrective biodiversity-management measures implemented as part of the S24G response. | High           | Low  | No Loss        | Reversible     |
|  |  |                                                                                 |                    |                |                |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |      |                |                |
|  |  | Direct mortality of fauna - Intentional killing of fauna                        | Development layout | Yes            | Direct         | Low  | Construction activities may have resulted in direct fauna mortality through the intentional killing of animals by construction personnel. The intentional killing, hunting, trapping, capturing or harassment of fauna was strictly prohibited, with appropriate environmental induction and toolbox training provided to all personnel. Fauna encountered during construction was not intentionally killed and any potentially dangerous or problem animals were managed by appropriately authorised personnel in accordance with applicable legislation. Fauna mortality incidents were recorded, investigated and corrective action implemented. Where historical construction activities resulted in confirmed fauna mortality, the residual impact was assessed and appropriate biodiversity-management measures implemented as part of the S24G corrective-management measures.                 | High           | Low  | No Loss        | Reversible     |
|  |  |                                                                                 |                    |                |                |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |      |                |                |

|  |  |                                                                                                                           |                    |     |        |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |        |            |         |            |
|--|--|---------------------------------------------------------------------------------------------------------------------------|--------------------|-----|--------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------|---------|------------|
|  |  | Direct mortality of fauna - Unintentional killing of fauna                                                                | Development layout | Yes | Direct | Low | Construction activities may have resulted in unintentional fauna mortality through vehicle and machinery movement, excavation activities, open trenches, construction pits and other construction-related hazards. Vehicle movement was restricted to designated areas and appropriate speed limits enforced. Open excavations were inspected regularly and provided with suitable escape mechanisms or secured when not in use. Environmental induction and toolbox talks informed personnel of procedures for fauna encounters. Fauna injuries and mortalities were recorded and investigated, with corrective measures implemented where required. Any residual impacts from historical fauna mortality was assessed and addressed through appropriate biodiversity-management measures as part of the S24G corrective-management measures                                                                                                                                                                            | High   | Low        | No Loss | Reversible |
|  |  | Direct mortality of fauna - Fauna casualties due to littering                                                             | Development layout | Yes | Direct | Low | Construction activities may have resulted in direct fauna mortality through the inappropriate disposal of litter and construction waste, with fauna potentially ingesting, becoming trapped in or becoming entangled in discarded materials. Adequate covered waste bins were provided, littering prohibited and regular housekeeping inspections undertaken. Lightweight and potentially hazardous materials were secured and waste removed regularly. Any fauna injuries or mortalities associated with litter were recorded and investigated. Areas historically affected by construction activities were inspected and cleared of residual litter, with appropriate corrective measures implemented as part of the S24G response.                                                                                                                                                                                                                                                                                    | Medium | Low        | No Loss | Reversible |
|  |  | Disruption of ecological life cycles due to the restriction of species movement - Open trenches and other linear barriers | Development layout | Yes | Direct | Low | Open trenches, excavations and other temporary linear barriers associated with construction may have restricted fauna movement and disrupted access to foraging, breeding and refuge areas. Trenches were kept to the minimum necessary footprint and duration, backfilled as soon as practicable, and provided with suitable escape ramps where they remain open. Open excavations were inspected daily for trapped fauna. Temporary barriers, spoil heaps and construction materials were removed once no longer required, and any residual barriers resulting from historical construction activities was assessed and removed or modified where necessary to restore ecological connectivity as part of the S24G corrective-management measures.                                                                                                                                                                                                                                                                     | Medium | Low        | No Loss | Reversible |
|  |  | Disruption of ecological life cycles due to the restriction of species movement - Infrastructure                          | Development layout | Yes | Direct | Low | Permanent infrastructure associated with the construction activities may have restricted fauna movement and contributed to habitat fragmentation by creating physical barriers between areas used for foraging, breeding, shelter and dispersal. The infrastructure footprint was limited to the required area and remaining natural vegetation and ecological corridors were retained where practicable. Where infrastructure has created significant barriers to fauna movement, opportunities to provide suitable openings, corridors or other connectivity measures were assessed. Existing infrastructure and surrounding areas were inspected for evidence of fauna restriction or mortality. Any residual fragmentation or restriction of fauna movement resulting from the historical activities was assessed and, where practicable, addressed through appropriate corrective and biodiversity-management measures as part of the S24G response.                                                                | Medium | Low-Medium | No Loss | Reversible |
|  |  | Disruption of ecological life cycles due to noise and lighting - Noise during construction                                | Development layout | Yes | Direct | Low | Construction activities may have generated elevated noise levels from vehicles, earthmoving equipment, generators, excavation, drilling and material handling, potentially disturbing fauna and disrupting normal foraging, communication, breeding and other ecological activities. Construction activities were, where practicable, restricted to daylight hours and the approved construction footprint. Equipment was properly maintained and fitted with effective silencers/mufflers, unnecessary idling and noise must be avoided, and high-noise activities were limited to the shortest practical duration. Acoustic screening was considered where sensitive fauna habitat was located nearby. Any significant noise-related impacts or fauna disturbance were recorded and investigated, with appropriate corrective measures implemented. Where historical construction activities have resulted in residual disturbance, this was assessed and addressed as part of the S24G corrective-management measures | Medium | Low        | No Loss | Reversible |

|                                               |          |                                                                                                  |                    |     |        |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |      |     |         |             |
|-----------------------------------------------|----------|--------------------------------------------------------------------------------------------------|--------------------|-----|--------|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-----|---------|-------------|
|                                               |          | Disruption of ecological life cycles due to noise and lighting - Lighting during construction    | Development layout | Yes | Direct | Low | Temporary artificial lighting associated with construction activities may have disturbed nocturnal and crepuscular fauna by altering natural day/night cycles and affecting foraging, movement, breeding and other ecological behaviours. Construction activities requiring lighting were, where practicable, restricted to daylight hours, with night-time lighting limited to essential activities and safety requirements. Lighting used the lowest practical intensity, was directed downward and was shielded to prevent unnecessary light spill into surrounding habitat. Lights were switched off when not required, with timers or motion sensors used where practicable. Temporary lighting was removed following construction. Any residual impacts associated with historical construction lighting were assessed and, where necessary, existing lighting was modified to minimise ecological disturbance as part of the S24G corrective-management measures.                                                                                  | High | Low | No Loss | Reversible  |
|                                               |          | Introduction of alien flora affecting native faunal assemblages - Vehicles and machinery         | Development layout | Yes | Direct | Low | Construction vehicles and machinery may have acted as vectors for the inadvertent introduction and spread of alien and invasive plant species through the movement of contaminated soil, seeds and plant material. Vehicles and machinery were inspected and, where necessary, cleaned before moving between areas, particularly areas containing known invasive vegetation. Unnecessary movement of contaminated soil was avoided and disturbed areas were regularly inspected for alien vegetation. Any alien invasive species established as a result of the historical construction activities were identified, controlled and appropriately disposed of, with affected areas rehabilitated using suitable indigenous vegetation. Records of inspections and alien vegetation control activities were maintained.                                                                                                                                                                                                                                     | High | Low | No Loss | Reversible  |
|                                               |          | Introduction of alien flora affecting native faunal assemblages - Soil Disturbance               | Development layout | Yes | Direct | Low | Soil disturbance associated with excavation, grading, trenching and construction activities may have created favourable conditions for the establishment and spread of alien and invasive plant species. The establishment of invasive vegetation may alter indigenous habitat structure and reduce the availability of suitable food and habitat resources for native fauna. Soil disturbance was restricted to the required footprint, with exposed areas rehabilitated as soon as practicable using appropriate indigenous vegetation. Disturbed areas were regularly inspected for alien and invasive species, with newly established plants removed before seed production. Any invasive vegetation associated with the historical S24G activities were controlled and the affected areas rehabilitated, with follow-up monitoring undertaken to prevent re-establishment. All applicable NEMBA requirements were adhered to.                                                                                                                        | High | Low | No Loss | Reversible  |
|                                               |          | Introduction of alien flora affecting native faunal assemblages - Clearing of primary vegetation | Development layout | Yes | Direct | Low | Clearing of primary vegetation associated with the construction activities may have increased the risk of establishment and spread of alien and invasive plant species by exposing soil and removing competition from indigenous vegetation. The resulting invasion may alter habitat structure and reduce the availability of suitable food and shelter for native fauna. Vegetation clearing was restricted to the required footprint, with remaining indigenous vegetation retained where practicable and disturbed areas rehabilitated as soon as possible using appropriate indigenous species. Cleared and disturbed areas were regularly inspected for alien and invasive vegetation, with newly established species controlled before they can reproduce and spread. Any existing alien invasive vegetation associated with the historical S24G activities was identified, controlled and followed by appropriate rehabilitation and monitoring. All applicable NEMBA and Alien and Invasive Species Regulations requirements must be adhered to. | High | Low | No Loss | Reversible  |
| Incidents, accidents and potential situations | Negative | Pollution incidents                                                                              | Development layout | Yes | Direct | Low | A site-specific spill and incident-response procedure was implemented. Spill kits were available at relevant locations and personnel trained in their use. All incidents were recorded, investigated and followed by corrective action. Significant incidents were reported to the responsible environmental representative and relevant authority where legally required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | High | Low | Partial | High Degree |
|                                               | Negative | Health and safety                                                                                | Development layout | Yes | Direct | Low | Construction activities complied with applicable occupational health and safety requirements. Workers received appropriate induction and task-specific training and used suitable PPE. Hazardous substances must be appropriately labelled and safely stored. Emergency procedures, spill-response procedures and access controls were implemented.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | High | Low | Partial | High Degree |

|        |          |                           |                    |    |        |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |        |     |               |              |
|--------|----------|---------------------------|--------------------|----|--------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----|---------------|--------------|
|        | Negative | Storage of hydrocarbons   | Development layout | No | Direct | Low | The storage of hydrocarbons during construction may have resulted in soil and surface-water contamination through accidental spills, leaks or overflows, with associated fire and safety risks. Hydrocarbons were stored in designated, secure areas on impermeable surfaces with appropriate secondary containment, away from water resources and drainage areas. Storage containers and associated infrastructure was regularly inspected for leaks and appropriately labelled, with SDS/MSDS readily available. Spill kits were maintained on site and personnel trained in spill response. Any spills were immediately contained, cleaned up and appropriately disposed of, with contaminated soil assessed and remediated where necessary. As part of the S24G response, former hydrocarbon storage and refuelling areas should be inspected for evidence of historical contamination and appropriate corrective and rehabilitation measures implemented where required                                                                                                                                | High   | Low | Partial       | High Degree  |
|        | Negative | Fire                      | Development layout | No | Direct | Low | Construction activities may increase the risk of accidental fires through hot-work activities, electrical equipment, machinery, fuels and other flammable materials. Dry vegetation and accumulated combustible waste may increase the likelihood and spread of fires, potentially resulting in vegetation loss, fauna mortality, air emissions and damage to infrastructure or neighbouring properties. Open fires and burning of waste was prohibited, while hot-work activities were appropriately controlled. Suitable firefighting equipment was readily available and maintained, personnel were trained in fire prevention and emergency response, and combustible materials were appropriately stored and regularly removed. Fire-risk areas were regularly inspected and appropriate firebreaks maintained where applicable. Any historical fire damage associated with the S24G activities were assessed and affected areas rehabilitated. Fire management must comply with the applicable requirements of the National Veld and Forest Fire Act and Occupational Health and Safety requirements. | Low    | Low | Partial       | High Degree  |
| Social | Negative | Visual impact             | Development layout | No | Direct | Low | Construction materials, equipment and waste were stored neatly within designated areas. Temporary structures and stockpiles were kept to the minimum practicable extent. The construction area was maintained in a clean and orderly condition and temporary infrastructure removed following completion of construction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | High   | Low | Irreplaceable | Irreversible |
|        | Negative | Safety security and       | Development layout | No | Direct | Low | Construction activities may pose safety and security risks to workers, visitors and surrounding communities through unauthorised access, construction traffic, operating machinery, open excavations, stored materials and other construction hazards. Construction areas were securely fenced and access controlled, with appropriate warning signage and separation of pedestrian and vehicle routes. Excavations and other hazardous areas were adequately barricaded and secured, while construction personnel received appropriate induction, training and PPE. Good housekeeping, secure storage of materials and equipment, emergency procedures and regular health and safety inspections were maintained. As part of the S24G response, the site was inspected for residual safety and security hazards resulting from the historical construction activities, with any identified hazards immediately secured or rectified.                                                                                                                                                                       | Medium | Low | Partial       | High Degree  |
|        | Negative | Traffic disruptions       | Development layout | No | Direct | Low | Construction traffic was controlled through designated access routes and appropriate speed limits. Vehicle movements were coordinated to minimise congestion and unnecessary trips. Construction vehicles complied with applicable roadworthiness and safety requirements. Materials and waste were transported securely to prevent spillage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | High   | Low | Partial       | High Degree  |
|        | Negative | Loss of cultural heritage | Development layout | No | Direct | Low | Ground-disturbing activities such as excavation, trenching, foundation construction and vegetation clearing may have resulted in the disturbance or loss of previously unidentified archaeological, palaeontological or other cultural heritage resources. Further disturbance were restricted to the required footprint and undertaken only where the necessary heritage assessment and authorisations had been obtained. A chance-find procedure was implemented, requiring all work to stop immediately if archaeological material, fossils, human remains, graves or other heritage resources are encountered. The affected area was secured and the relevant heritage authority and suitably qualified heritage specialist notified, with work only recommencing once the required assessment, mitigation and/or authorisation has been completed. Any historical heritage impacts associated with the S24G activities were documented and appropriately mitigated in accordance with the NHRA.                                                                                                        | Low    | Low | Partial       | High Degree  |

|          |          |                                    |                    |     |          |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |          |         |             |
|----------|----------|------------------------------------|--------------------|-----|----------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|----------|---------|-------------|
|          | Negative | Loss of sense of place             | Development layout | No  | Direct   | Low      | Construction activities may have resulted in a loss of sense of place through the introduction of construction infrastructure, machinery, stockpiles, exposed soils, cleared vegetation, waste and other visually intrusive elements that altered the established character of the area. Construction activities were restricted to the required footprint, with good housekeeping, appropriate storage of materials, dust suppression and removal of redundant infrastructure and waste implemented. Existing vegetation was retained where practicable to provide visual screening, while disturbed areas were rehabilitated using appropriate indigenous vegetation following completion of construction. Where historical S24G activities have resulted in a persistent alteration of the visual character of the area, appropriate screening, landscaping and rehabilitation measures were implemented to reduce the residual impact.           | Low  | Low      | Partial | High Degree |
|          | Positive | Change of land use                 | Development layout | Yes | Direct   | + Medium | The historical construction activities resulted in a change in land use through the establishment of buildings, infrastructure, hardstand areas, access routes and associated services, resulting in the permanent or temporary transformation of portions of the site from their previous land-use function. The development footprint was clearly defined and further disturbance outside the required footprint prevented. Areas that were disturbed by the historical construction activities but are not required for the ongoing operation were rehabilitated through appropriate grading, stabilisation and revegetation, where applicable. The current land use was confirmed against applicable municipal planning and zoning requirements, and any required approvals or regularisation processes were undertaken. The final land-use footprint and rehabilitation areas was monitored to prevent further unnecessary land transformation. | None | + Medium | Partial | High Degree |
| Economic | Positive | Decline/increase in economy        | Development layout | Yes | Direct   | + Medium | The historical construction activities may have contributed positively to the local and regional economy through expenditure on construction materials, equipment, transport, contractors and other services, as well as through temporary employment opportunities. The positive economic impact can be enhanced where outstanding S24G-related rehabilitation or corrective works are required by prioritising suitably qualified local labour, contractors and SMMEs and sourcing goods and services locally where practicable. Such opportunities were implemented transparently and without compromising environmental, health and safety requirements. Records of local employment and procurement have been maintained where applicable.                                                                                                                                                                                                      | None | + Medium | No Loss | Reversible  |
|          | Positive | Decline/increase in property value | Development layout | No  | Direct   | + Medium | The historical construction activities may have contributed to an increase in property values where the resulting infrastructure and improved site condition enhance the functionality, visual quality and investment potential of the area. However, the extent of any increase in property value cannot be attributed solely to the S24G activities and is influenced by broader market and land-use factors. The positive impact can be enhanced through appropriate maintenance of infrastructure, good housekeeping, landscaping, rehabilitation of unnecessarily disturbed areas, effective management of dust, noise, waste, stormwater and pollution, and ensuring compatibility with surrounding land uses and municipal planning requirements. Complaints from neighbouring property owners should be recorded and appropriately addressed.                                                                                                | None | + Medium | No Loss | Reversible  |
|          | Positive | Employment                         | Development layout | Yes | Indirect | + Medium | Where practicable, local labour was considered for suitable construction-related opportunities. Contractors complied with applicable labour and occupational health and safety requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | None | + Medium | No Loss | Reversible  |

#### 10.4.2 OPERATIONAL IMPACTS

Table 10-13 below provides a summary of the identified impacts and significance ranking (WOM = Without Mitigation) for the operational phase of the development. Impacts for each alternative are also provided.

Brief management measures have been provided for the purposes of assessing whether the implementation of recommended management measures may be sufficient to decrease the significance ranking (WM = With Mitigation).

The detailed impact assessment table is attached in Chapter 13.10.

Table 10-13: Summary of Quantitative Impact Assessment – Operational Phase.

|                        | IMPACTS  |                                                                                                                      |                    |            |          | CONSEQUENCE  |              |               |                 | PROBABILITY                  | RANKING WITHOUT MITIGATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | IMPLEMENTATION OF MANAGEMENT MEASURES | RANKING WITH MITIGATION | DEGREE REVERSABILITY & LOSS OF RESOURCE (AFTER MITIGATION) |            |  |
|------------------------|----------|----------------------------------------------------------------------------------------------------------------------|--------------------|------------|----------|--------------|--------------|---------------|-----------------|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|-------------------------|------------------------------------------------------------|------------|--|
|                        | Nature   | Description                                                                                                          | Option             | Cumulative | Type     | Extent (A)   | Duration (B) | Intensity (C) | Probability (P) | Significance (A + B + C) X P | Description and/or Mitigation and Management Measures (if applicable)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Mitigation Effectiveness              |                         | Reversibility                                              |            |  |
| OPERATIONAL PHASE      |          |                                                                                                                      |                    |            |          |              |              |               |                 |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                       |                         |                                                            |            |  |
| Atmospheric Emissions  | Negative | Dust emissions                                                                                                       | Development layout | Yes        | Indirect | Local        | Incidental   | Low-Medium    | Highly Likely   | Low-Medium                   | Dust emissions associated with the storage of hazardous materials are expected to be minimal and will primarily result from vehicle movement on paved surfaces and routine loading and offloading activities. Good housekeeping, regular cleaning of hardstand areas, prompt removal of spill residues, maintenance of internal roads, and covering or containing dusty materials where applicable will minimise dust generation and prevent contamination of surrounding areas.                                                                                                             | Low                                   | Low                     | No Loss                                                    | Reversible |  |
|                        | Negative | Emissions from vehicles and equipment (CO2, NOx, SOx, VOC's etc.)                                                    | Development layout | Yes        | Indirect | Local        | Short-term   | Medium        | Highly Likely   | Low-Medium                   | Vehicle movements associated with the delivery and collection of hazardous materials may result in exhaust emissions that temporarily affect local air quality. This impact can be minimised through regular vehicle maintenance, avoiding unnecessary idling, efficient traffic management, and ensuring that all transport vehicles comply with applicable vehicle emission standards.                                                                                                                                                                                                     | Low                                   | Low-Medium              | No Loss                                                    | Reversible |  |
|                        | Negative | Noise                                                                                                                | Development layout | No         | Indirect | Neighbouring | Incidental   | Low-Medium    | Definite        | Low                          | Operational noise will be generated mainly by delivery vehicles, forklifts, pumps and other equipment associated with the storage and handling of hazardous materials. Noise impacts will be minimised through routine maintenance of equipment, restricting unnecessary idling of vehicles, limiting loading and offloading activities to normal operating hours where practicable, and ensuring compliance with applicable municipal noise requirements. Given the site's location within an established industrial area, the residual noise impact is expected to be of low significance. | Very Low                              | Low                     | No Loss                                                    | Reversible |  |
| Impact to Ground Water | Negative | Groundwater quality (Potential deterioration of stormwater quality due to accidental spills or contaminated runoff.) | Development layout | Yes        | Direct   | Regional     | Medium-term  | Medium        | Possible        | Low                          | Accidental leaks or spills from the storage and handling of hazardous materials could contaminate groundwater if not appropriately contained. This risk will be minimised through the use of bunded storage areas, impermeable surfaces, routine inspections and maintenance of storage infrastructure, immediate spill clean-up, and implementation of spill response procedures. Residual impacts are expected to be of low significance.                                                                                                                                                  | Very Low                              | Low                     | No Loss                                                    | Reversible |  |
| Waste Generation       | Negative | Domestic waste                                                                                                       | Development layout | Yes        | Direct   | Site         | Incidental   | Low-Medium    | Highly Likely   | Low                          | Domestic waste generated by employees during routine operations may result in littering and poor housekeeping if not properly managed. General waste should be collected in designated containers, separated for recycling where practicable, and removed regularly by a licensed waste service provider to maintain a clean and safe working environment.                                                                                                                                                                                                                                   | Very Low                              | Low                     | No Loss                                                    | Reversible |  |
|                        | Negative | Hazardous waste                                                                                                      | Development layout | Yes        | Direct   | Neighbouring | Medium-term  | Medium-High   | Possible        | Low                          | Hazardous waste, including contaminated absorbents, spill clean-up materials and used containers, may be generated during the storage and handling of hazardous materials. Hazardous waste should be stored in designated, bunded areas and removed by a licensed hazardous waste contractor for treatment or disposal at a licensed waste management facility in accordance with the National Environmental Management: Waste Act, 2008 (Act 59 of 2008).                                                                                                                                   | Very Low                              | Low                     | No Loss                                                    | Reversible |  |

|                                                         |          |                                                                                                   |                    |     |          |              |            |            |               |            |                                                                                                                                                                                                                                                                                                                                                                                                                                              |          |     |         |            |
|---------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------|--------------------|-----|----------|--------------|------------|------------|---------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----|---------|------------|
| Soil Alteration                                         | Negative | Soil pollution (Potential soil contamination from accidental spills during storage and handling.) | Development layout | No  | Direct   | Site         | Short-term | Medium     | Possible      | Low        | Accidental spills or leaks during the storage and handling of hazardous materials may result in soil contamination. This risk will be minimised through the use of bunded storage areas, impermeable surfaces, routine inspections, prompt spill containment and clean-up, and the implementation of spill response procedures. Contaminated material, where generated, should be disposed of through a licensed hazardous waste contractor. | Very Low | Low | No Loss | Reversible |
| Resource Consumption                                    | Negative | Electricity consumption                                                                           | Development layout | Yes | Direct   | Site         | Long-term  | Medium     | Highly Likely | Low-Medium | Electricity is required for the operation of pumps, lighting, ventilation and other equipment associated with the storage of hazardous materials. Energy consumption should be minimised through routine maintenance of equipment, the use of energy-efficient systems where practicable, and switching off equipment when not in use.                                                                                                       | Low      | Low | No Loss | Reversible |
|                                                         | Negative | Water consumption                                                                                 | Development layout | Yes | Indirect | Site         | Long-term  | Medium     | Highly Likely | Low-Medium | Water is used for routine cleaning, emergency response, and domestic activities associated with the storage of hazardous materials. Water consumption should be minimised through efficient water use practices, regular inspection and maintenance of water infrastructure to prevent leaks, and the implementation of water conservation measures where practicable.                                                                       | Low      | Low | No Loss | Reversible |
|                                                         | Negative | Fuel consumption                                                                                  | Development layout | Yes | Indirect | Site         | Incidental | Low-Medium | Improbable    | Low        | Fuel is consumed by delivery vehicles, forklifts and other equipment associated with the storage and handling of hazardous materials. Fuel consumption should be minimised through regular vehicle and equipment maintenance, efficient logistics planning, reducing unnecessary idling, and using fuel-efficient equipment where practicable.                                                                                               | Very Low | Low | No Loss | Reversible |
|                                                         | Negative | Raw materials consumption                                                                         | Development layout | Yes | Direct   | Neighbouring | Incidental | Low-Medium | Possible      | Low        | Raw materials associated with the storage and handling of hazardous substances are consumed during normal operations. Consumption should be managed through effective inventory control, proper storage to prevent deterioration or losses, regular stock monitoring, and prompt clean-up of any spills to minimise waste and improve resource efficiency.                                                                                   | Very Low | Low | No Loss | Reversible |
| Effects on Biodiversity                                 | Negative | Direct mortality of fauna - Intentional killing of fauna                                          | Development layout | Yes | Indirect | Site         | Incidental | Low-Medium | Improbable    | Low        | It is not expected that any fauna will be found on site during operation. Mitigation measures include that the Management must include the requirement in their rule book that should any be found that the relevant organization be called to safely remove the species.                                                                                                                                                                    | Very Low | Low | No Loss | Reversible |
|                                                         | Negative | Direct mortality of fauna - Unintentional killing of fauna                                        | Development layout | Yes | Direct   | Local        | Incidental | Low-Medium | Improbable    | Low        | It is not expected that any fauna will be found on site during operation. Recommendation include that employees, clients and truck drivers should always be vigilant when using roads and vehicles.                                                                                                                                                                                                                                          | Very Low | Low | No Loss | Reversible |
|                                                         | Negative | Disruption of ecological life cycles due to the restriction of species movement - Infrastructure  | Development layout | Yes | Indirect | Site         | Permanent  | Low-Medium | Improbable    | Low        | The existing facility is located within a fully developed industrial area where ecological connectivity has already been substantially altered. No additional infrastructure is proposed, and operational activities are therefore not expected to further restrict species movement. Good housekeeping and pollution prevention measures should be maintained to avoid indirect impacts on any surrounding habitats.                        | Very Low | Low | No Loss | Reversible |
| Incidents, accidents and potential emergency situations | Negative | Pollution incidents                                                                               | Development layout | Yes | Direct   | Local        | Incidental | Medium     | Possible      | Low        | Accidental spills, leaks or releases of hazardous materials may result in pollution of soil, stormwater and surrounding infrastructure. The risk should be minimised through the implementation of spill prevention and response procedures, bunded storage areas, regular inspection and maintenance of storage facilities, employee training, and immediate containment and clean-up of any pollution incidents.                           | Very Low | Low | No Loss | Reversible |

|          |          |                         |                    |     |          |              |             |            |               |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |          |        |         |            |
|----------|----------|-------------------------|--------------------|-----|----------|--------------|-------------|------------|---------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------|---------|------------|
|          | Negative | Health and safety       | Development layout | No  | Direct   | Neighbouring | Incidental  | Low        | Improbable    | Low        | The storage and handling of hazardous materials may pose health and safety risks to employees and visitors through accidental exposure, spills or fire. Risks should be managed through compliance with the Occupational Health and Safety Act, 1993 (Act 85 of 1993) and the Hazardous Chemical Agents Regulations, 2021, including the use of appropriate personal protective equipment (PPE), employee training, emergency response procedures, and the availability of Safety Data Sheets (SDSs). | Very Low | Low    | No Loss | Reversible |
|          | Negative | Storage of hydrocarbons | Development layout | No  | Direct   | Site         | Medium-term | Low-Medium | Definite      | Low-Medium | The storage of hydrocarbons presents a risk of spills, leaks and fire, which may result in soil and water contamination. These risks should be minimised through storage within bunded and impermeable containment areas, routine inspection and maintenance of storage facilities, implementation of spill response procedures, and compliance with applicable environmental and occupational health and safety legislation.                                                                         | Very Low | Low    | No Loss | Reversible |
|          | Negative | Fire                    | Development layout | No  | Direct   | Neighbouring | Incidental  | Medium     | Possible      | Low        | The storage and handling of hazardous materials may present a fire risk if not properly managed. This risk should be minimised through appropriate storage and segregation of incompatible substances, maintenance of fire detection and suppression systems, routine inspections, employee training, and the implementation of emergency response and fire management procedures.                                                                                                                    | Very Low | Low    | No Loss | Reversible |
| Social   | Negative | Visual impact           | Development layout | No  | Direct   | Site         | Long-term   | Low        | Highly Likely | Low-Medium | The storage of hazardous materials may have a minor visual impact due to the presence of storage tanks, containers and associated infrastructure. Visual impacts should be minimised through good housekeeping, regular maintenance of storage facilities, appropriate screening where practicable, and ensuring that storage areas are kept clean, organised and free of unnecessary clutter.                                                                                                        | Low      | Low    | No Loss | Reversible |
|          | Positive | Safety and security     | Development layout | Yes | Direct   | Neighbouring | Long-term   | Low-Medium | Improbable    | Low        | The controlled storage of hazardous materials within a secure facility, supported by access control, surveillance, trained personnel and emergency response procedures, enhances site safety and security while reducing the risk of unauthorised access, theft, vandalism and accidental releases. Continued implementation of these measures will maintain this positive impact.                                                                                                                    | Very Low | Low    | No Loss | Reversible |
|          | Negative | Traffic disruptions     | Development layout | No  | Direct   | Neighbouring | Long-term   | Low-Medium | Possible      | Low        | The transport of hazardous materials may result in temporary increases in heavy vehicle traffic and localised traffic disruptions. These impacts should be minimised through efficient logistics planning, scheduling deliveries outside peak traffic periods where practicable, using designated access routes, and ensuring compliance with the National Road Traffic Act, 1996 and applicable dangerous goods transport requirements.                                                              | Very Low | Low    | No Loss | Reversible |
|          | Negative | Loss of sense of place  | Development layout | No  | Indirect | Neighbouring | Long-term   | Low        | Improbable    | Low        | The storage of hazardous materials is located within an established industrial area and is consistent with the surrounding land uses. As such, the activity is not expected to result in a significant loss of sense of place. Continued good housekeeping, maintenance of infrastructure, and appropriate screening of storage areas where practicable will further minimise any visual effects.                                                                                                     | Very Low | Low    | No Loss | Reversible |
| Economic | Positive | Improvement in economy  | Development layout | Yes | Direct   | National     | Long-term   | Low-Medium | Highly Likely | Medium     | The continued storage and handling of hazardous materials support the ongoing operation of the Isando Foods facility, sustaining employment, contributing to the local and regional economy, and supporting the food manufacturing supply chain. Continued compliance with environmental and safety legislation will ensure these socio-economic benefits are maintained.                                                                                                                             | Very Low | Medium | No Loss | Reversible |

|  |          |                            |                    |     |        |              |           |            |          |            |                                                                                                                                                                                                                                                                                                                                                                                                                                    |          |            |         |            |
|--|----------|----------------------------|--------------------|-----|--------|--------------|-----------|------------|----------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------|---------|------------|
|  | Positive | Increase in property value | Development layout | No  | Direct | Neighbouring | Permanent | Low-Medium | Possible | Low        | The continued lawful operation of the Isando Foods facility contributes to the stability and economic activity of the established Isando Industrial Area, supporting investment and potentially enhancing surrounding industrial property values. Ongoing compliance with environmental, health and safety requirements and maintaining the facility in a clean and well-managed condition will help sustain this positive impact. | Very Low | Low        | No Loss | Reversible |
|  | Positive | Employment                 | Development layout | Yes | Direct | Regional     | Long-term | Low-Medium | Likely   | Low-Medium | The continued storage and handling of hazardous materials support the ongoing operation of the Isando Foods facility, thereby sustaining existing employment opportunities and contributing to local economic development. Continued investment in employee training, health and safety, and regulatory compliance will help maintain this positive impact.                                                                        | Very Low | Low-Medium | No Loss | Reversible |

## 10.5 DESCRIPTION OF IMPACTS

A discussion of impacts to various aspects is provided below. Impacts that have been identified as having a low-medium impact significance rating and higher (before mitigation) are discussed in more detail within the subsection in terms of their risks or concerns affecting the environment. A discussion on how mitigation measures are expected to decrease/increase the significance rating is also provided as well as input from specialists where this input was used to assess impacts.

In addition, it is important to assess the natural environment using a systems approach that will consider the cumulative impact of various actions. A Cumulative impact refers to *“the impact on the environment, which results from the incremental impact of the actions when added to other past, present and reasonably foreseeable future actions regardless of what agencies or persons undertake such actions”*. Cumulative impacts can result from individually minor, but collectively significant actions or activities taking place over a period of time. Cumulative effects can take place frequently and over a period of time that the effects cannot be assimilated by the environment. Cumulative impacts are also discussed in the subsections that follow.

### 10.5.1 ATMOSPHERIC EMISSIONS

#### 10.5.1.1 Overview

Atmospheric emissions associated with the Section 24G activities include dust emissions and emissions from vehicles and equipment during both the construction and operational phases. Dust could have been generated during historical construction activities through excavation, material handling and vehicle movement, while ongoing vehicle movements, loading and offloading activities may continue to generate localised dust and exhaust emissions, including CO<sub>2</sub>, NO<sub>x</sub>, SO<sub>x</sub> and VOCs. Given that the activities occurred within an existing, predominantly paved industrial facility, the impacts are considered localised and of limited extent. The impact assessment identifies these impacts as Low-Medium significance before mitigation and Low significance after mitigation. Mitigation includes maintaining paved areas and good housekeeping, implementing dust suppression where required, minimising vehicle idling, and ensuring that vehicles and equipment are properly maintained and compliant with applicable roadworthiness and emissions requirements. A number of other mitigation measures have also been implemented on site, including: the installation of strip curtains at entrance points to the boiler room, installation of a water spraying system in the coal storage area, and implementing a wet ash storage system.

#### 10.5.1.2 Cumulative Impacts

Atmospheric emissions associated with the Section 24G activities may contribute cumulatively to existing air-quality pressures within the surrounding industrial area, particularly through dust emissions and emissions from vehicles and equipment. These emissions may combine with emissions from existing industrial activities, including those associated with the broader Isando Foods operations, as well as other surrounding industrial and transport-related sources. However, given the existing developed and predominantly paved nature of the site, the localised nature of the Section 24G activities, and the implementation of appropriate dust, vehicle and equipment emission controls, the cumulative impact is

considered Low significance following mitigation. Continued implementation of the ERMP, good housekeeping, dust suppression where required, and proper maintenance of vehicles and equipment will further minimise the contribution of the Section 24G activities to cumulative atmospheric emissions in the surrounding area.

## **10.5.2 NOISE**

### **10.5.2.1 Overview**

Noise impacts associated with the Section 24G activities may arise from historical construction activities and from the ongoing operation of the dangerous-goods storage facilities, primarily through the use of construction equipment, delivery vehicles, forklifts, pumps and other operational equipment. Given that the activities occur within an existing industrial area and that there are no direct neighbouring receptors immediately adjacent to the development footprint, the overall noise impact is expected to be low following mitigation. Mitigation measures include restricting construction activities to appropriate daytime hours where applicable, maintaining vehicles and equipment in accordance with manufacturer specifications, avoiding unnecessary idling and use of horns, limiting noisy activities to the shortest practical duration, and managing loading and offloading activities during normal operating hours where practicable. Any noise complaints should be recorded and investigated through the site's complaints-management process, with corrective measures implemented where necessary.

### **10.5.2.2 Cumulative Impacts:**

Noise generated by the Section 24G activities may occur intermittently during construction-related activities and ongoing operational activities, primarily from vehicle movements, equipment and associated handling activities. These activities occur within an existing industrial area where background noise is already influenced by surrounding industrial and transportation activities. While the Section 24G activities may contribute incrementally to the existing noise environment, the impact assessment indicates that cumulative noise impacts are not expected to be significant, provided that activities remain within the existing operational footprint and appropriate noise management measures are maintained.

## **10.5.3 IMPACTS TO AQUATIC RESOURCES**

### **10.5.3.1 Overview**

The Section 24G activities are located within an existing, developed and predominantly paved industrial facility at 21 Quality Road, Isando. Potential impacts to aquatic resources associated with the dangerous goods storage facilities include deterioration of water quality from accidental hydrocarbon, hexane or chemical spills, contaminated stormwater runoff, and inadequate management of effluent or waste. Given the established nature of the site, the limited additional disturbance associated with the activities and the presence of existing stormwater and containment infrastructure, the potential impacts on aquatic resources are expected to be low in significance, provided that appropriate mitigation and management measures are maintained. Key measures include maintaining bunding and spill-containment infrastructure, implementing appropriate spill prevention and emergency response procedures, preventing contaminated stormwater from leaving the site, maintaining stormwater infrastructure, and ensuring that any contaminated material is promptly contained and appropriately disposed of.

#### **10.5.3.2 Cumulative Impacts**

Cumulative impacts to aquatic resources may arise through the contribution of site-related runoff or accidental pollution to existing impacts associated with the broader industrial environment and surrounding urbanised area. However, the Section 24G activities are not expected to materially increase the existing pressure on aquatic resources, particularly where the existing containment, stormwater and pollution-prevention measures remain effective. With the implementation of the recommended mitigation measures and continued monitoring and maintenance, the cumulative impact is expected to remain low and not significant.

### **10.5.4 WASTE GENERATION**

#### **10.5.4.1 Overview**

Waste generation associated with the Section 24G activities includes domestic waste, construction waste, effluent waste and hazardous waste. The activities are situated within an existing, established industrial facility, and the waste-related impacts associated with the historical construction and ongoing operation of the dangerous goods storage facilities are expected to be low in significance, provided that appropriate waste management measures are implemented. Key measures include the segregation, appropriate storage, recycling and disposal of waste; preventing waste storage areas and containers from becoming overfilled; ensuring waste is removed by appropriately licensed service providers with disposal records retained; and preventing waste from causing nuisance, odour or pollution. Effluent and potentially contaminated waste streams must be appropriately contained and managed to prevent releases to the surrounding environment. Any hazardous materials or contaminated waste arising from spills must be immediately contained, cleaned up and removed by an appropriately licensed service provider.

#### **10.5.4.2 Cumulative Impacts:**

Waste generated by the Section 24G activities contributes incrementally to waste streams generated by the existing Isando Foods operations and other activities within the surrounding industrial area. Waste generation is therefore cumulative in nature; however, the contribution from the Section 24G activities is expected to be limited. Through effective waste minimisation, segregation, recycling, appropriate storage and disposal, and the retention of waste-transfer and disposal records, the cumulative impact of waste generation can be maintained at low significance.

### **10.5.5 SOIL**

#### **10.5.5.1 Overview**

Potential impacts to soil associated with the Section 24G activities include loss of topsoil, loss of land capability, alteration of soil, soil pollution, soil erosion, nutrient loss and changes to topography. These impacts are primarily associated with the historical construction of the dangerous goods storage infrastructure, including excavation and installation activities, as well as the potential for hydrocarbon, hexane or chemical spills and inappropriate waste handling during ongoing operation. As the development was undertaken within an existing, extensively developed and predominantly paved industrial facility, additional disturbance to soil resources is limited.

The potential impacts are considered low in significance, provided that appropriate mitigation and management measures are implemented. Key measures include maintaining effective stormwater management and drainage infrastructure, preventing and promptly addressing spills, maintaining bunding and impermeable surfaces around dangerous goods storage areas, and ensuring that contaminated soil or material is appropriately removed and disposed of. Where soil disturbance occurs, disturbed areas should be appropriately stabilised and rehabilitated.

#### **10.5.5.2 Cumulative Impacts**

Impacts such as soil alteration, soil pollution, loss of topsoil and loss of land capability may contribute cumulatively to existing impacts associated with surrounding industrial and urban activities. However, given the established nature of the Isando Foods site and the limited additional disturbance associated with the Section 24G activities, the contribution of the development to cumulative soil impacts is expected to be limited. Adherence to the mitigation measures contained in the EMPr, particularly effective spill prevention and response, stormwater management, waste management and rehabilitation of disturbed areas, will minimise the potential cumulative impact. Overall, the cumulative impact to soil is expected to remain low in significance following mitigation.

### **10.5.6 RESOURCE CONSUMPTION**

#### **10.5.6.1 Overview**

Resource consumption associated with the Section 24G activities includes the use of water, electricity, raw materials and fuel during the historical construction and ongoing operation of the dangerous goods storage facilities. Given that the development forms part of an existing industrial facility, the additional resource requirements associated specifically with the Section 24G activities are expected to be limited. The impact assessment indicates that resource consumption can be reduced through appropriate resource-efficiency measures.

Mitigation and management measures include implementing water and electricity conservation strategies, monitoring and recording fuel consumption, promoting efficient use of raw materials, and providing environmental awareness training to employees. Where practicable, the facility should continue implementing energy-efficiency measures and reducing reliance on external electricity supply through renewable-energy initiatives. With the implementation of these measures, the impact associated with resource consumption is expected to remain low in significance.

#### **10.5.6.2 Cumulative Impacts:**

Consumption of water, electricity, raw materials and fuel is cumulative in nature, as the resources used by the Section 24G activities contribute to the existing and future demand associated with the Isando Foods facility and surrounding industrial activities. However, the additional demand attributable specifically to the Section 24G activities is expected to be limited. Continued implementation of resource-efficiency measures, including water and electricity conservation, fuel-use monitoring and efficient use of raw materials, will minimise the contribution of the activities to cumulative resource consumption. Overall, the cumulative impact is expected to remain low in significance following mitigation.

## **10.5.7 EFFECTS ON BIODIVERSITY**

### **10.5.7.1 Overview**

The Section 24G activities are located within an existing, highly disturbed industrial site, with the western portion of the property having been transformed by historical human activities, including the former farmhouse, stores and associated outbuildings. The biodiversity assessment further indicates that the site does not constitute Egoli Granite Grassland and that the surrounding wetland and terrestrial environment has been influenced by historical and ongoing anthropogenic activities. Consequently, the additional impact of the Section 24G activities on biodiversity is expected to be limited.

Potential biodiversity impacts associated with the activities include loss of habitat and vegetation, direct mortality of fauna, and disruption of ecological life cycles and species movement. Given the already transformed nature of the site and the limited additional disturbance associated with the Section 24G activities, these impacts are expected to be low in significance, provided that the recommended mitigation measures are implemented.

Key mitigation and management measures include restricting activities to the existing development footprint and avoiding sensitive ecological features; prohibiting unnecessary disturbance, capture, injury or killing of fauna; implementing environmental awareness training for employees and contractors; ensuring that fires are only permitted in appropriately designated areas with suitable firefighting equipment available; managing alien and invasive species; restricting noisy construction activities to appropriate daytime hours; minimising unnecessary artificial lighting; and ensuring that any disturbed areas are appropriately rehabilitated. Where boundary structures are required, these should, where practicable, allow for the movement of small fauna.

### **10.5.7.2 Cumulative Impacts:**

Impacts on biodiversity may be cumulative where the Section 24G activities contribute to the broader pattern of development and transformation within the surrounding area. The cumulative pressure on biodiversity is therefore associated primarily with the existing and increasing development within the broader industrial and urban environment. However, the Section 24G activities are located within an already developed and highly disturbed industrial site, and the development does not involve significant additional transformation of intact natural habitat. The avoidance of sensitive ecological features and implementation of the recommended biodiversity mitigation measures will further limit the contribution of the activities to cumulative biodiversity impacts. Overall, the cumulative impact on biodiversity is expected to remain low in significance following mitigation.

## **10.5.8 INCIDENTS, ACCIDENTS, AND POTENTIAL EMERGENCY SITUATIONS**

### **10.5.8.1 Overview**

The Section 24G activities involve the storage and handling of dangerous goods, including hexane, diesel, caustic substances and LO10/LCO, and therefore have the potential to result in incidents, accidents or emergency situations. The impact assessment considered four key aspects, namely pollution incidents, health and safety risks, storage of hydrocarbons/dangerous goods, and fire. Although such incidents could

potentially have a low-medium intensity, they are considered incidental in nature and the overall impacts are therefore expected to be low in significance, particularly with the implementation of appropriate preventative and emergency-response measures.

Key mitigation and management measures include ensuring that all employees and relevant contractors receive appropriate health and safety and emergency-response training; maintaining dangerous-goods storage areas in accordance with applicable requirements; ensuring appropriate containment and spill-response equipment, including readily accessible spill kits, is available; and implementing procedures for the immediate containment and clean-up of spills. Sewerage, stormwater infrastructure and dangerous-goods storage areas should be routinely inspected and maintained to minimise the potential for pollution incidents. Appropriate fire prevention and emergency procedures should be implemented, with suitable firefighting equipment readily accessible and emergency contact numbers clearly displayed. Site security should also be maintained to reduce the potential for unauthorised access and associated incidents.

#### **10.5.8.2 Cumulative Impacts:**

Impacts associated with incidents, accidents and potential emergency situations are primarily site-specific and incidental in nature and are therefore not expected to result in a significant cumulative impact. While the surrounding industrial environment contains other activities involving vehicles, industrial processes and potentially hazardous substances, an incident at the Isando Foods facility would generally be confined to the facility and its immediate surroundings. Effective dangerous-goods management, preventative maintenance, spill containment, fire prevention and emergency-response procedures will minimise the likelihood and potential extent of such incidents. Overall, no significant cumulative impact is anticipated, provided that the required mitigation and emergency-management measures are maintained.

### **10.5.9 SOCIAL**

#### **10.5.9.1 Overview**

From a social perspective, the Section 24G activities may result in impacts relating to visual character, safety and security, traffic, cultural heritage and sense of place. Given that the activities are located within an established industrial area and form part of an existing operational facility, these impacts are expected to be low in significance. The existing industrial character of the surrounding area further limits the potential change to the visual character and sense of place associated with the activities.

Potential impacts can be further reduced through appropriate management measures, including maintaining good housekeeping and cleanliness of the site, maintaining effective access control and site security, and implementing appropriate traffic and safety controls. A Chance Find Procedure should be implemented and communicated to employees and contractors to ensure that any previously unidentified heritage resources encountered during activities are appropriately managed and reported. Any complaints relating to noise, traffic, visual impacts, safety or other social concerns should be recorded and addressed through the site's complaints-management process.

#### 10.5.9.2 Cumulative Impacts:

Certain social impacts, particularly safety and security, traffic, visual impacts, loss of cultural heritage and changes to the sense of place, may contribute cumulatively to existing impacts associated with the broader industrial and urban environment. However, the Section 24G activities are located within an existing industrial facility and therefore do not represent a substantial change from the established land-use character of the area. With appropriate site management, security, traffic controls, heritage protection measures and good housekeeping, the contribution of the activities to cumulative social impacts is expected to remain low in significance.

### 10.5.10 ECONOMIC

#### 10.5.10.1 Overview

From an economic perspective, the Section 24G activities are expected to provide positive economic benefits through the continued operation and maintenance of the existing Isando Foods facility. These benefits include support for the local economy, maintenance and creation of employment opportunities, and support for local contractors and suppliers associated with the facility and its ongoing operations. Given that the Section 24G activities relate to existing infrastructure and operations, the economic benefits are primarily associated with the continued operation of the facility and retention of existing economic activity, rather than the creation of a new development.

The economic impact is therefore considered positive, with the significance of the benefit enhanced through the use of local contractors, service providers and suppliers where reasonably practicable. Continued operation of the facility also supports indirect economic activity through procurement, transportation, maintenance and other services associated with the manufacturing operation.

#### 10.5.10.2 Cumulative Impacts:

The positive economic impacts associated with employment, local procurement and economic activity are cumulative in nature, as the benefits generated by Isando Foods contribute to the broader economic activity within the Isando and Ekurhuleni area. The continued operation of the facility can therefore contribute to the retention of employment opportunities and support for local businesses and service providers. Where practicable, the use of local contractors, suppliers and service providers should be prioritised to maximise these benefits. Overall, the cumulative economic impact is expected to be positive, with the continued operation of the facility contributing to the local and regional economy.

## 10.6 MITIGATION

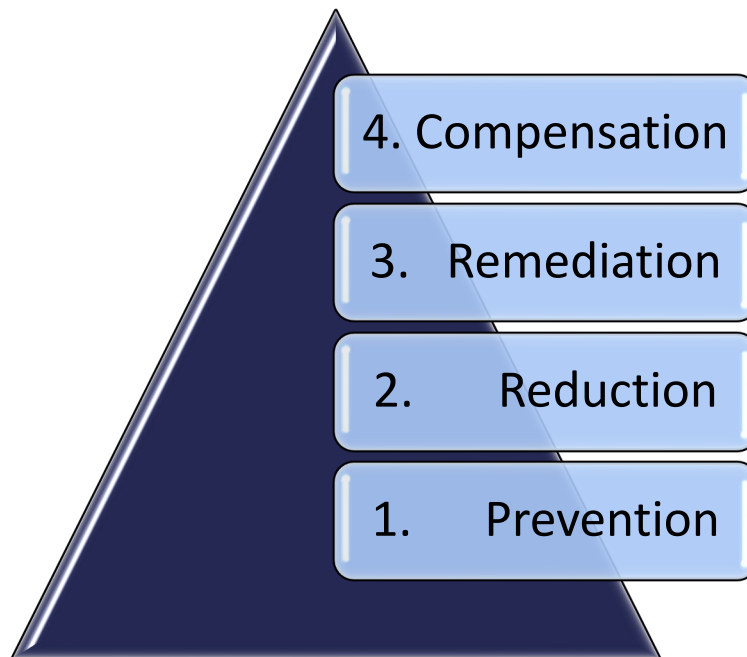
According to the EIA Regulations, 2014 [as amended], "mitigation" means to "*anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible*". Based on this definition, it is possible to see that a mitigation hierarchy exists.

At the bottom of this hierarchy is the most preferred option which includes **prevention (1)**. These mitigation measures aim to avoid impacts completely. Some mitigation measures suggested for the development are at this level (for example, implementation of major spill and or fire prevention measures).

The second level of mitigation is **reduction (2)** which involves mitigation measures that minimise impacts. Most of the mitigation measures suggested for the development fall into this level.

Mitigation measures for the development also include **remediation measures (3)** for environmental impacts. These measures focus on remediating or rehabilitating areas after they have been impacted.

**Compensation (4)** involves compensating the loss of an entire feature. In the case for the environment, this usually means consideration of an off-set associated with rehabilitation and mitigation. No offsets or compensation measures are included in the mitigation measures for the development.



**Figure 10-1: Mitigation Hierarchy.**

An EMPr was developed based on the findings of the impact assessment of the EIA and in line with the requirements of Appendix 4 of GN 982 of 4 December 2014 [as amended]. The EMPr represents detailed plans of action and includes site-specific mitigation measures for all the mentioned impacts or potential impacts. The mitigation and management measures will include a combination of the following:

- Physical environmental management structures.
- Monitoring and compliance of pollution and regulatory requirements.

All liability for the implementation of the EMPr (as well as the EIA findings and environmental authorisation) lies with the project applicant which in this case is **Isando Foods (Pty) Ltd.**

## 11 ENVIRONMENTAL IMPACT STATEMENT

The EIA Regulations 2014 require that the EIA Report include an Environmental Impact Statement that includes the following:

- A map at an appropriate scale which superimposes the activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers;
- A summary of the key findings of the environmental impact assessment; and
- A summary of the positive and negative impacts and risks of the activity.

In addition, the EIA Report must include the following:

- Based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorization.
- 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.
- A description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;
- 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;
- Any specific information that may be required by the competent authority; and
- Any other matters required in terms of section 24(4)(a) and (b) of the Act.

In order to ensure that the Impact Statement is comprehensive and includes all the requirements of the Regulations, this section aims to meet the abovementioned requirements.

## 11.1 SENSITIVE ENVIRONMENTAL FEATURES

Chapter 4 of this report provides an overview of the environmental sensitivities associated with the study area. The Isando Foods facility is situated within the established Isando industrial area in the City of Ekurhuleni, where the surrounding landscape has been extensively transformed by industrial, commercial, transport and associated infrastructure developments.

According to the Gauteng Conservation Plan (C-Plan v4), the study site itself does not fall within a Critical Biodiversity Area (CBA), Ecological Support Area (ESA) or Protected Area (PA) (Figure 11-1). The nearest biodiversity-sensitive areas occur several hundred metres from the site and comprise isolated CBA1 and ESA polygons associated with remaining natural open spaces and ecological corridors within the broader landscape. Consequently, the existing Isando Foods facility is not located within a priority terrestrial biodiversity area.

Similarly, the site falls within Zone 5 (Industrial and Large Commercial Focus Zone) of the Gauteng Provincial Environmental Management Framework (GPEMF), which recognises the area as an established industrial node where industrial and commercial land uses are encouraged, subject to appropriate environmental management measures.

The National Environmental Management: Biodiversity Act (Act 10 of 2004) identifies the broader area as occurring within the Rietvlei Highveld Grassland threatened ecosystem (Figure 11-1). However, the study site has been completely transformed through long-standing industrial development and consists almost entirely of buildings, paved surfaces, storage areas and associated infrastructure. No intact natural grassland vegetation remains within the property, and the site therefore contributes negligibly to the conservation objectives of the threatened ecosystem.

The National Wetland Map Version 6 (NWM6) indicates that no mapped wetlands or watercourses occur within the boundaries of the Isando Foods property (Figure 11-2). The nearest mapped aquatic features comprise channelled and unchannelled valley-bottom systems situated several hundred metres from the site. Owing to the highly urbanised nature of the surrounding environment, these systems have been substantially modified by historical industrial development, road infrastructure and urban stormwater drainage.

Although the facility is not located within a mapped wetland or biodiversity priority area, operational activities involving the storage and handling of hazardous substances have the potential to indirectly affect downstream water resources through accidental spills or contaminated stormwater runoff if not appropriately managed. Existing stormwater infrastructure, bunded chemical storage areas, spill response procedures and waste management practices therefore remain important mitigation measures to prevent pollution of downstream aquatic environments.

Overall, the environmental sensitivity of the study site is considered low from a terrestrial biodiversity perspective due to the extensive historical transformation of the property and its location within an

established industrial area. The principal environmental sensitivity relates to the protection of downstream water resources through effective pollution prevention and stormwater management rather than the conservation of natural terrestrial habitats.

**Key sensitive environmental features associated with the Isando Foods site include:**

- The property is situated within an established industrial area that has been extensively transformed by historical development.
- The property is situated within the Highveld Priority Area (HPA).
- The site does not occur within a mapped Critical Biodiversity Area (CBA), Ecological Support Area (ESA) or Protected Area (PA) as identified by the Gauteng Conservation Plan (C-Plan v4).
- The site is located within Zone 5 (Industrial and Large Commercial Focus Zone) of the Gauteng Provincial Environmental Management Framework.
- The broader area falls within the Rietvlei Highveld Grassland threatened ecosystem; however, no natural representative vegetation remains on the property.
- No mapped wetlands or watercourses occur within the site boundary according to the National Wetland Map Version 6.
- The nearest aquatic systems comprise modified channelled and unchanneled valley-bottom systems located outside the development footprint.
- The primary environmental risk associated with the facility is the air emissions and potential indirect impact on downstream water resources through contaminated stormwater runoff or accidental spills, which is managed through existing operational controls and environmental management measures.

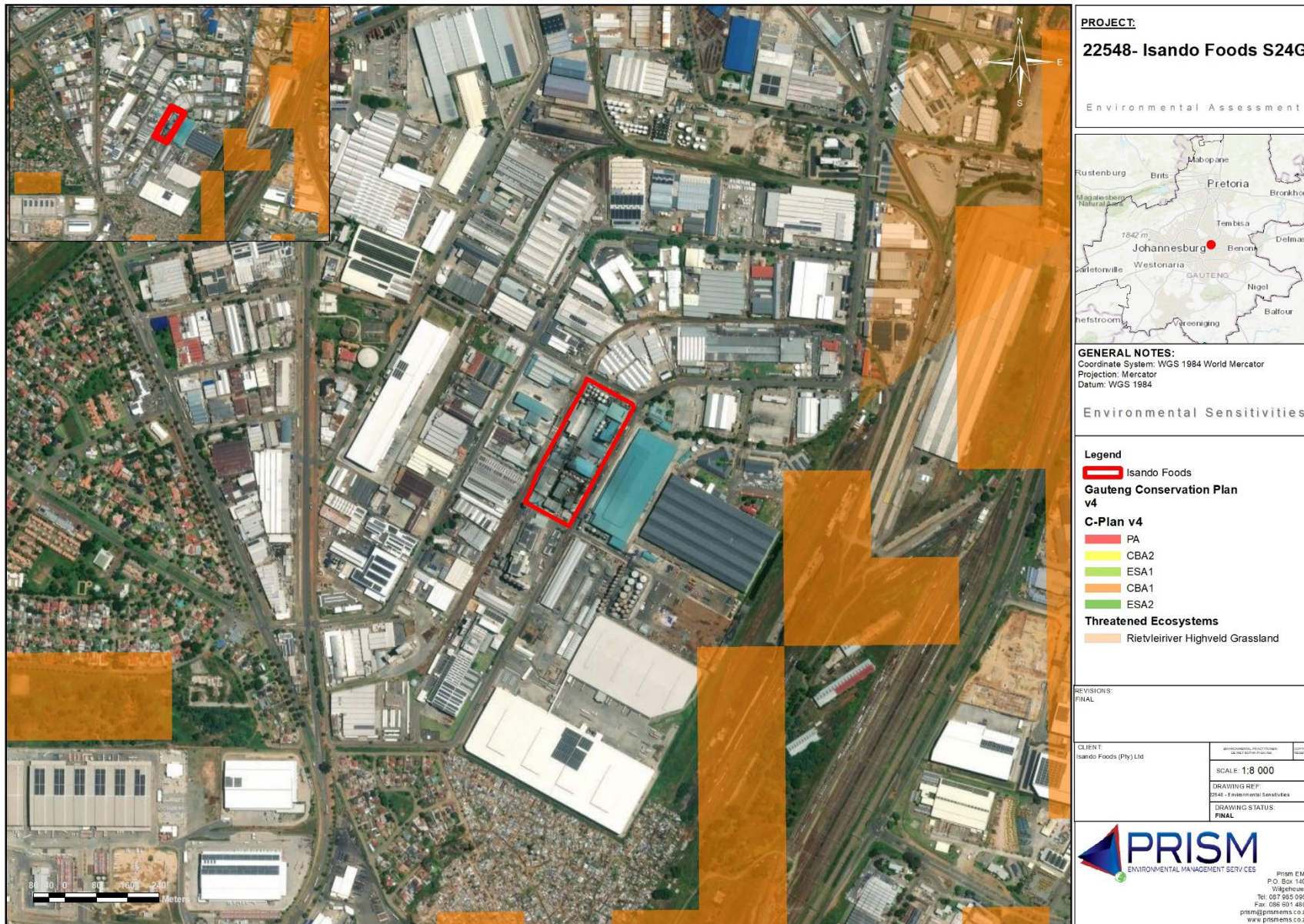


Figure 11-1: Environmental Sensitivity Map.

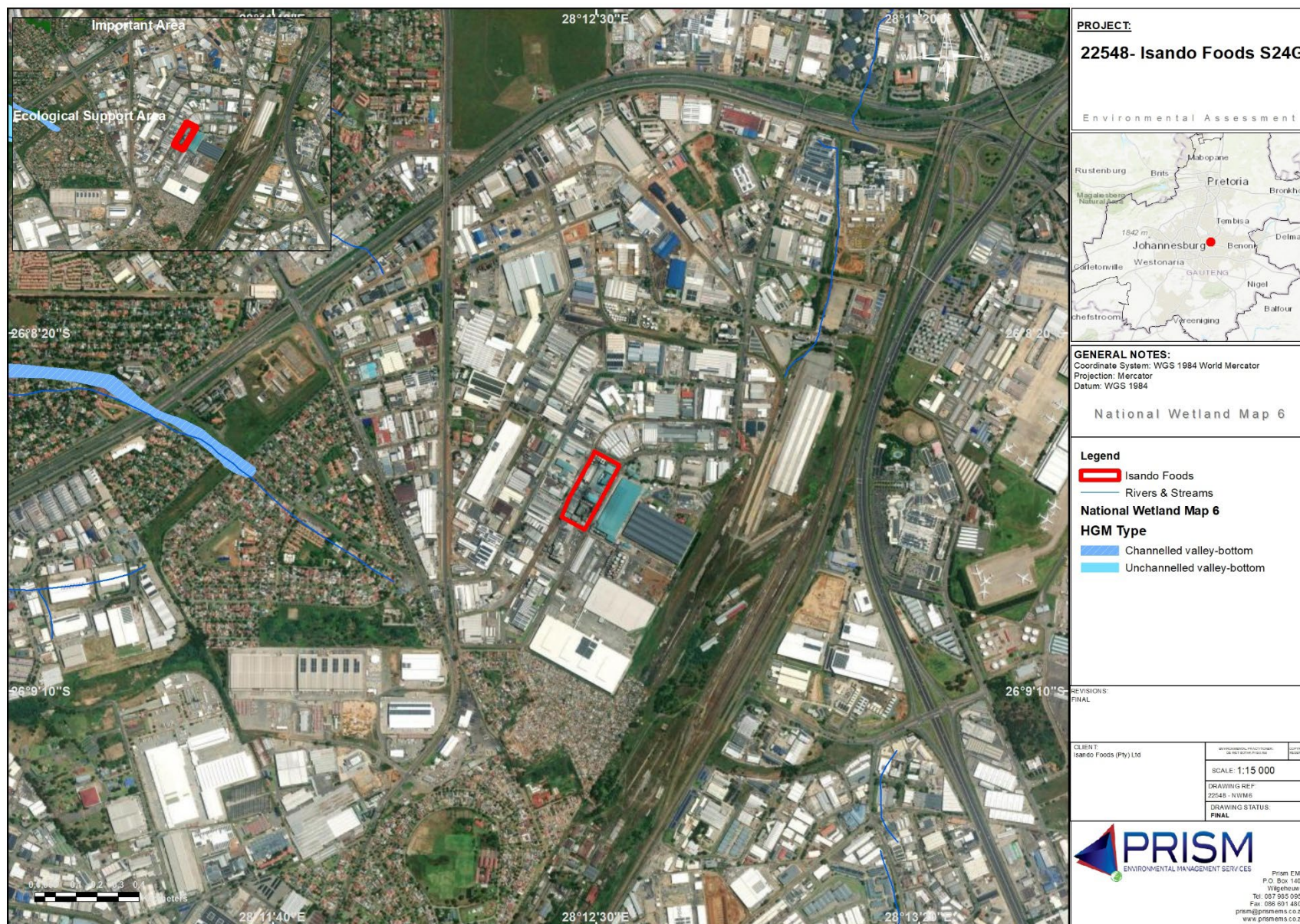


Figure 11-2: NWM6.

## 11.2 SUMMARY OF IMPACTS

A detailed discussion on impacts is provided in Chapter 10.4 and 10.5 however in summary, all impacts can be satisfactorily mitigated to low or low-medium significance. Positive impacts have a Medium significance.

## 11.3 RECOMMENDATIONS FROM SPECIALIST REPORTS

An overview of the recommendations of the various environmental and technical specialists are provided in Table 11-1. Please note that only the main mitigation measures are provided. All mitigation measures are however included in the EMPr.

**Table 11-1: Specialist Recommendations.**

|                              | Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Development to proceed |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| <b>Waste Management Plan</b> | <ul style="list-style-type: none"> <li>Waste generated at the facility must be appropriately identified, classified, segregated, stored, handled, transported and disposed of in accordance with the applicable waste-management requirements.</li> <li>General, recyclable and hazardous waste streams must be kept separate to maximise opportunities for recycling and recovery and to prevent cross-contamination.</li> <li>Hazardous waste, including spent bleaching earth and other hazardous waste streams, must be stored in designated, appropriately labelled and suitably contained areas prior to removal.</li> <li>Waste storage areas and containers must be maintained in a clean and suitable condition, with containers covered where necessary to prevent windblown litter, nuisance and pollution.</li> <li>Waste must be removed regularly and must not be allowed to accumulate to the extent that it creates a nuisance, pollution risk or health and safety hazard.</li> <li>Appropriately authorised/licensed waste service providers must be used for the transportation and disposal of hazardous waste, and waste manifests, disposal certificates and other relevant records must be retained.</li> <li>Employees must receive appropriate waste-management and environmental awareness training, including training relating to hazardous waste handling and emergency procedures.</li> <li>Any waste-related spills, pollution incidents or other environmental incidents must be immediately contained, reported and appropriately remediated.</li> <li>Continued implementation and periodic review of the Waste Management Procedure is recommended to ensure continual improvement in waste minimisation, recycling, storage and disposal practices.</li> </ul> | ✓                      |

|                              | Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Development to proceed |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| Stormwater Management Report | <ul style="list-style-type: none"> <li>The Stormwater Management Plan (SWMP) must be finalised based on the findings of the site-wide topographic assessment currently being undertaken by appropriately qualified specialists.</li> <li>The topographic assessment must identify and assess the existing site levels, drainage patterns, stormwater catchments, natural and artificial flow paths, stormwater infrastructure and discharge points to inform the design and implementation of appropriate stormwater management measures.</li> <li>Stormwater management infrastructure must be designed and maintained to ensure the effective collection, conveyance, attenuation and controlled discharge of clean and potentially contaminated stormwater, while preventing uncontrolled runoff from the site.</li> <li>Clean stormwater must, where practicable, be kept separate from potentially contaminated stormwater, particularly in areas associated with dangerous goods, hydrocarbons, chemical storage, waste handling and other potential pollution sources.</li> <li>Areas where hydrocarbons, dangerous goods or other potentially contaminating substances are stored or handled must have appropriate containment and drainage controls to prevent spills or contaminated runoff from entering the stormwater system or receiving environment.</li> <li>Stormwater infrastructure, channels, drains, culverts and attenuation structures must be regularly inspected and maintained to ensure that they remain functional and free from blockages, excessive sediment, waste or other obstructions.</li> <li>Measures must be implemented to minimise erosion, sediment mobilisation and sedimentation associated with stormwater runoff, particularly during periods of heavy rainfall.</li> <li>Any stormwater-related pollution incidents, including spills or uncontrolled discharges, must be immediately contained, reported and appropriately remediated in accordance with the Emergency Response Plan and applicable environmental requirements.</li> <li>The completed SWMP must be incorporated into the EMP and implemented as an operational management requirement, with responsibilities, inspection requirements and maintenance measures clearly assigned.</li> <li>The SWMP must be periodically reviewed and updated where changes to site layout, drainage infrastructure, operations or identified environmental risks occur, and the findings of inspections and incidents must be used to support continual improvement in stormwater management.</li> </ul> | ✓                      |
| Emergency Response Plan      | <ul style="list-style-type: none"> <li>The Emergency Response Plan must be implemented and maintained to ensure that Isando Foods is adequately prepared to respond to incidents and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | ✓                      |

|                                       | Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Development to proceed |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
|                                       | <p>emergency situations that may result in environmental pollution, health and safety risks or damage to infrastructure.</p> <ul style="list-style-type: none"> <li>• Employees and relevant contractors must receive appropriate emergency response training and induction, including their responsibilities during an emergency.</li> <li>• Emergency contact details and procedures must be readily available and clearly displayed at appropriate locations throughout the facility.</li> <li>• Adequate spill-response equipment and spill kits must be maintained at locations where spills or releases could occur, particularly around hydrocarbon and dangerous-goods storage areas.</li> <li>• Fire-fighting equipment must be appropriately positioned, maintained and readily accessible, and emergency evacuation procedures must be communicated to employees.</li> <li>• Dangerous goods, hydrocarbons and other hazardous substances must be appropriately stored, handled and contained to minimise the potential for accidental releases, fires and other emergency situations.</li> <li>• Emergency equipment and response procedures must be regularly inspected and tested, and deficiencies must be rectified as soon as reasonably practicable.</li> <li>• Environmental incidents must be recorded, investigated and followed by appropriate corrective actions to prevent recurrence.</li> <li>• The Emergency Response Plan must be reviewed periodically and updated where changes to site activities, infrastructure, risks or emergency-response requirements occur.</li> </ul> |                        |
| <b>Stack Emission Monitoring Plan</b> | <ul style="list-style-type: none"> <li>• Annual stack emission monitoring must continue to be undertaken for the applicable boiler stacks under representative operating conditions and in accordance with the applicable monitoring requirements.</li> <li>• Monitoring results must be compared against the applicable emission limits and emission-reduction targets, with trends assessed over time to identify deterioration or improvement in emission performance.</li> <li>• The baghouse filtration systems, filter bags, associated ducting and other emission-control equipment must be regularly inspected and maintained to ensure effective operation.</li> <li>• Boiler operating conditions, including fuel quality and feed rates, must be appropriately managed to minimise particulate matter and sulphur dioxide emissions.</li> <li>• Coal quality must be monitored and managed, particularly with regard to characteristics that may influence atmospheric emissions.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | ✓                      |

|  | Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Development to proceed |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
|  | <ul style="list-style-type: none"> <li>The grit arrestor and associated emission-control infrastructure must be maintained and cleaned in accordance with the ERMP requirements.</li> <li>Where monitoring identifies elevated emissions or an adverse emission trend, the cause must be investigated and appropriate corrective action implemented.</li> <li>Stack monitoring results, maintenance records and corrective actions must be retained as part of the facility's environmental records and used to inform the annual ERMP review.</li> <li>Continued implementation of the emission-reduction measures contained in the ERMP is recommended to support achievement of the applicable Highveld Priority Area emission-reduction targets.</li> </ul> |                        |

## 11.4 ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE

Prism EMS used the information provided and made available by the Applicant as well as the input from the relevant specialists as described in the document. The accuracy of the document would be limited to the available documents presented at this phase of the development process.

## 11.5 REASONED OPINION OF EAP

### 11.5.1 SUMMARY OF EIA REPORT FINDINGS

Isando Foods (Pty) Ltd operates a vegetable oil manufacturing facility at 21 Quality Road, Isando, on Portion 695 of the Farm Witkoppie IR, within the Ekurhuleni Metropolitan Municipality, Gauteng Province. The facility is located within an established industrial area and has been extensively transformed through historical industrial development. The Section 24G application relates to the unlawful expansion and continued operation of dangerous-goods storage facilities, including the installation of an underground 280m<sup>3</sup> hexane tank, which increased the total dangerous-goods storage capacity on the property to approximately 461m<sup>3</sup>. The activity triggered Activity 51 of Listing Notice 1 (GN R983 of 2014, as amended), and Environmental Authorisation was therefore required prior to commencement.

The Section 24G application was submitted to the Gauteng Department of Environment (GDEnv) on 28 January 2026, and a Directive was subsequently issued on 25 June 2026 requiring a comprehensive Environmental Impact Report, further public participation, an Environmental Management Programme and supporting specialist and technical studies. This FEIR has consequently assessed the environmental consequences associated with the historical unlawful commencement and ongoing operation of the dangerous-goods storage facilities, together with the applicable mitigation and management measures.

The site is situated within Zone 5 – Industrial and Large Commercial Focus Zone of the Gauteng Provincial Environmental Management Framework (GPEMF). The location is therefore compatible with the established industrial character and broader spatial planning context of the area. The GPEMF does not, however, retrospectively authorise the unlawful commencement of the listed activity or replace the Section 24G process. Its relevance has accordingly been considered as a supporting spatial and environmental planning consideration in the assessment.

The receiving environment is characterised by extensive historical transformation, with most of the site comprising buildings, paved surfaces, roads and operational areas. The site does not occur within a mapped Critical Biodiversity Area, Ecological Support Area or Protected Area according to C-Plan v4. Although the broader area is associated with a threatened grassland ecosystem, no natural representative vegetation remains on the property. The primary environmental sensitivity identified is therefore associated with the protection of downstream water resources from contaminated stormwater runoff and accidental spills, rather than the conservation of intact terrestrial habitat.

The assessment identified potential impacts associated with the historical construction and ongoing operation of the dangerous-goods storage facilities, including impacts relating to stormwater and water quality, soil and land capability, waste generation, biodiversity, atmospheric emissions, noise, incidents and emergency situations, and social and economic considerations. The impact assessment incorporated both qualitative and quantitative assessments and considered the findings of the relevant specialist studies and technical reports. Overall, the identified impacts can be satisfactorily mitigated to low or low-medium significance, while positive socio-economic impacts were assessed as having medium significance.

A key consideration is the management of stormwater and potential pollution from the storage and handling of dangerous goods. The existing facility contains bunded chemical and dangerous-goods storage areas, spill-response procedures and waste-management controls. A comprehensive Stormwater Management Plan is currently being prepared, informed by a site-wide topographic assessment that will identify drainage patterns, catchment areas, flow paths, levels and existing stormwater infrastructure. The completed SWMP will be incorporated into the facility's environmental management measures and implemented as part of the EMPr.

The Waste Management Plan and Emergency Response Plan provide measures to manage waste streams, hazardous materials, spills, fires and other emergency situations. These measures include appropriate waste segregation, containment and disposal, maintenance of spill-response equipment, emergency training, fire protection, incident reporting and corrective action. Continued implementation of these measures is considered necessary to minimise the potential for environmental pollution and health and safety impacts.

Atmospheric emissions represent another important environmental consideration due to the existing operation of the facility and its location within the Highveld Priority Area. The Stack Emission Monitoring Plan requires continued monitoring of the applicable boiler stacks, maintenance of emission-control equipment and implementation of the emission-reduction measures contained in the Environmental Reduction and Management Plan (ERMP). Where elevated emissions or adverse trends are identified, corrective action must be implemented.

Public participation has been undertaken in accordance with the requirements of the Section 24G Directive and the EIA Regulations, 2014 (as amended). The process included preliminary notification and registration, further notification following the GDEnv Directive, and public review of the Environmental Impact Report. Comments received during the process have been incorporated into the Comments and Responses Report accompanying the Section 24G submission.

The development is fully established and operational and the Section 24G process is retrospective in nature. Alternatives to the existing dangerous-goods storage configuration were therefore not considered practicable in the conventional sense, as the assessment concerns an existing facility and seeks to determine whether its continued operation can be appropriately managed and authorised retrospectively.

Based on the findings of the environmental assessment, specialist and technical studies, and provided that the mitigation and management measures contained in the EMPr and supporting management plans are fully implemented, the identified environmental impacts can be managed to acceptable levels.

The EAP is therefore of the opinion that the continued operation of the dangerous-goods storage facilities may be considered for retrospective GP EMF Registration / Environmental Authorisation, subject to the conditions and mitigation measures identified in this FEIR and the EMPr.

### 11.5.2 REASONS FOR DECISION

Based on the findings of the environmental assessment, specialist and technical investigations, public participation process and impact assessment, and taking into account the successful implementation of the Environmental Management Programme (EMPr), it is the opinion of the EAP that the existing Isando Foods facility and the Section 24G activity may be considered for retrospective GP EMF registration / Environmental Authorisation, subject to the implementation of the recommended mitigation and management measures and any conditions imposed by the competent authority. In summary, the following reasons form the basis of this opinion:

- The Section 24G Rectification Process has been undertaken in response to the unlawful commencement of the listed activity associated with the expansion of the dangerous goods storage facilities. The relevant activity relates to Activity 51 of Listing Notice 1, concerning the expansion and operation of facilities for the storage and handling of dangerous goods where the storage capacity is increased by more than 80m<sup>3</sup>. The storage infrastructure was completed in June 2023 and is situated within the existing Isando Foods industrial facility.
- The development is appropriately located within an established industrial area. The Isando Foods facility is situated within the established Isando industrial precinct, where industrial manufacturing, storage, logistics and associated land uses are predominant. The site falls within Zone 5 – Industrial and Large Commercial Focus Zone of the Gauteng Provincial Environmental Management Framework (GPEMF), which recognises established industrial areas as appropriate locations for industrial and large commercial activities, subject to suitable environmental management measures. The GPEMF has therefore confirmed the spatial compatibility of the existing activity, although it does not retrospectively remove the requirement for Environmental Authorisation or replace the Section 24G process.
- The activity is contained within an existing, highly transformed industrial footprint. The dangerous goods storage infrastructure was established within an existing developed and paved industrial complex and did not require the transformation of previously undisturbed land. The surrounding environment has been extensively transformed by industrial, commercial, transport and associated infrastructure development.
- The site does not occur within a mapped terrestrial biodiversity priority area. According to the Gauteng Conservation Plan (C-Plan v4), the site does not fall within a Critical Biodiversity Area (CBA), Ecological Support Area (ESA) or Protected Area (PA). Although the broader area occurs within the Rietvlei Highveld Grassland threatened ecosystem, no intact natural representative vegetation remains within the property due to its longstanding industrial transformation.
- The potential impacts on aquatic resources are considered manageable. No mapped wetlands or watercourses occur within the site boundary according to the National Wetland Map Version 6. The nearest aquatic systems are modified channelled and unchannelled valley-bottom systems located outside the development footprint. The principal aquatic environmental risk is therefore considered to be an indirect impact on downstream water resources through contaminated stormwater runoff or accidental spills, which can be managed through appropriate containment, stormwater management, spill response and pollution-prevention measures.
- Appropriate environmental management measures have been identified to address the key environmental risks associated with the facility. These include the implementation of the Waste

Management Plan and associated waste-management procedures, appropriate storage and handling of hazardous waste, spill prevention and response measures, emergency response procedures, maintenance of containment infrastructure, and environmental awareness and training. These measures have been incorporated into the EMPr.

- Stormwater management is being addressed as a key mitigation requirement. A site-wide topographic assessment is being undertaken by appropriately qualified specialists to establish site levels, drainage patterns, stormwater catchments, flow paths, infrastructure and discharge points. The findings will inform the finalisation and implementation of the Stormwater Management Plan (SWMP), with the objective of ensuring that clean and potentially contaminated stormwater is appropriately managed and that uncontrolled runoff and pollution of downstream resources are prevented.
- The facility provides positive socio-economic benefits through the continued operation of an established industrial activity. The continued operation of Isando Foods supports existing employment and economic activity and contributes to the local and regional economy through procurement, transportation, maintenance, contractors, suppliers and other services associated with the manufacturing operation. These benefits are considered positive and of Medium significance in the impact assessment.
- No environmental or technical specialist assessment has identified a fatal flaw that would preclude the continued operation of the existing facility. The assessment indicates that the principal environmental risks associated with the facility can be addressed through existing operational controls and the implementation of the recommended mitigation and management measures. The site is also located within an established industrial setting and does not require a new greenfield development footprint.
- The impacts identified through the environmental assessment can be satisfactorily mitigated. The impact assessment concludes that all identified impacts can be mitigated to Low or Low-Medium significance, while the positive impacts have been assessed as Medium significance. The EMPr provides site-specific mitigation and management measures, including physical environmental management structures and monitoring of pollution and regulatory requirements.
- Alternatives to the existing facility are not considered practicable within the context of the Section 24G application. The facility is fully established and operational, and the current application relates to the retrospective authorisation of existing infrastructure and activities rather than a new development. No layout or technology alternatives are therefore considered appropriate. The assessment identifies the continued operation of the existing facility within its current footprint, subject to implementation of the EMPr and applicable Environmental Authorisation conditions, as the preferred and only viable alternative.
- The assumptions, uncertainties and gaps in knowledge are not considered sufficient to materially affect the overall conclusions of the assessment. The assessment has been informed by the available site information, environmental sensitivity assessment, specialist and technical investigations, public participation process and detailed impact assessment. Where additional technical information is required, such as the site-wide topographic assessment informing the SWMP, this has been identified as an ongoing requirement and will be incorporated into the environmental management measures.

Overall, the EAP is therefore of the opinion that, subject to the implementation of the EMPr, completion and implementation of the SWMP, continued implementation of the waste and emergency management

measures, ongoing environmental monitoring and compliance with the conditions of any Environmental Authorisation granted by GDEnv, the identified environmental impacts associated with the Section 24G activity can be satisfactorily managed.

### 11.5.3 PROPOSED CONDITIONS

A number of critical mitigation and management measures accompany this recommendation and should be included as conditions of the Environmental Authorisation, should retrospective authorisation be granted. These conditions are intended to ensure that the continued operation of the existing dangerous goods storage facilities is undertaken in accordance with the applicable environmental requirements and that potential impacts identified through the assessment are appropriately prevented, minimised and managed. The following conditions are recommended:

- The Environmental Management Programme (EMPr) must be implemented in full by Isando Foods (Pty) Ltd, including all site-specific mitigation, monitoring, management and compliance measures identified in the FEIR and specialist and technical assessments.
- The Stormwater Management Plan (SWMP) must be finalised and implemented based on the findings of the site-wide topographic assessment currently being undertaken by appropriately qualified specialists. The SWMP must address site drainage patterns, stormwater catchments, flow paths, existing stormwater infrastructure and discharge points, and must provide for the appropriate collection, conveyance, attenuation and controlled discharge of stormwater.
- Clean and potentially contaminated stormwater must be appropriately managed and separated where practicable, particularly in areas associated with dangerous goods, hydrocarbons, chemicals and waste, to prevent contaminated runoff from entering the surrounding environment or downstream aquatic resources. Existing stormwater infrastructure, containment structures and drainage systems must be routinely inspected and maintained.
- All dangerous goods storage and handling areas must be appropriately contained and maintained, including bunding and spill-containment infrastructure, in accordance with the applicable environmental and safety requirements. Any spills or leaks must be immediately contained, reported and appropriately remediated.
- The Waste Management Procedure must be implemented and periodically reviewed. General, recyclable and hazardous waste streams must be appropriately segregated, stored, handled, transported and disposed of. Hazardous waste, including spent bleaching earth and other hazardous waste streams, must be stored in suitably labelled and contained areas and removed by appropriately authorised service providers. Relevant waste manifests, disposal certificates and other records must be retained.
- The Emergency Response Plan must be implemented and maintained, including appropriate emergency procedures, emergency contact details, spill-response equipment, fire-fighting equipment and procedures for incidents involving dangerous goods, hydrocarbons and other hazardous substances. Personnel must receive appropriate training and emergency equipment must be routinely inspected and maintained.
- Stack emissions from the facility must continue to be monitored in accordance with the Stack Emission Monitoring Plan and applicable emission requirements. Monitoring results must be assessed against

the applicable emission limits and the emission-reduction targets contained in the facility's Emission Reduction and Management Plan, with elevated or increasing emission trends investigated and corrective measures implemented where necessary.

- The facility must maintain appropriate pollution-prevention and environmental monitoring measures to ensure that accidental releases, contaminated stormwater, waste-related pollution and other operational impacts do not adversely affect surrounding or downstream environmental resources.
- Environmental incidents, complaints and instances of non-compliance must be recorded and appropriately managed, including the implementation of corrective and remedial measures where required. Records of environmental inspections, maintenance, monitoring, incidents, complaints and corrective actions must be retained and made available to the competent authority upon request.
- Environmental awareness and waste/emergency management training must be provided to employees and relevant contractors, particularly personnel involved in the storage and handling of dangerous goods, hazardous waste, spill response and emergency procedures.
- The recommendations contained in the specialist and technical assessments must be incorporated into the EMPr and implemented for the duration of the operation. This includes the recommendations associated with stormwater management, waste management, emergency response and stack emission monitoring.
- The SWMP, Waste Management Procedure, Emergency Response Plan and emission-management measures must be periodically reviewed and updated, where necessary, to ensure continued effectiveness and continual improvement in the environmental management of the facility.

The above conditions are considered critical to ensuring that the environmental risks associated with the retrospective Section 24G activity remain adequately controlled and that the continued operation of the existing dangerous goods storage facilities does not result in unacceptable environmental impacts. The responsibility for implementation of the EMPr and associated environmental management measures rests with Isando Foods (Pty) Ltd.

## 12 EAP UNDERTAKING

I, **De Wet Botha**, as the Environmental Assessment Practitioner managing this application provide the following affirmation in relation to -

- the correctness of the information provided in the reports;
- the inclusion of comments and inputs from stakeholders and I&APs;
- the inclusion of inputs and recommendations from the specialist reports where relevant; and
- 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;



Designation: Principal Environmental Assessment Practitioner

**Prism Environmental Management Services**

Company

**15 September 2026**

Date

## 13 APPENDICES

---

### 13.1 CURRICULUM VITAE OF EAP

## 13.2 SECTION 24 G

### 13.2.1 APPLICATION FORM

*For official use only – Final submission only*

### 13.2.2 SECTION 24G DIRECTIVE

### 13.2.3 SWORN AFFIDAVITS

*For official use only – Final submission only*

#### 13.2.4 POPIA CONSENT FORMS

*Included in BID*

### 13.3 A3 MAPS AND DRAWINGS

## 13.4 PHOTO REPORT

## **13.5 PUBLIC PARTICIPATION**

### **13.5.1 INTERESTED AND AFFECTED PARTY DATABASE**

## **13.5.2 PROOF OF PRELIMINARY NOTIFICATION**

### **13.5.2.1 Newspaper Notices**

#### 13.5.2.2 Site Notices

### 13.5.2.3 Background Information Document

#### 13.5.2.4 Written Notification

*To Follow*

### **13.5.3 PROOF OF NOTIFICATION OF FURTHER NOTIFICATION**

#### **13.5.3.1 Newspaper Notices**

#### 13.5.3.2 Site Notices

#### 13.5.3.3 Background Information Document

#### 13.5.3.4 Written Notification

*To Follow*

#### 13.5.4 COMMENTS RECEIVED

### 13.5.5 COMMENTS AND RESPONSES REPORT

## **13.6 TECHNICAL REPORTS**

### **13.6.1 EMERGENCY RESPONSE PLAN**

### 13.6.2 WASTE MANAGEMENT PLAN

### 13.6.3 STACK MONITORING PLAN

## 13.7 ENVIRONMENTAL MANAGEMENT PROGRAMME

## 13.8 DFFE SCREENING TOOL

## **13.9 APPROVED AUTHORISATIONS AND PERMITS**

## 13.10 FINANCIAL STATEMENTS

**Confidential Information.**

*For official use only – Final submission only*