



D: PCM REFERENCE NUMBER: 19/3/2/4/B1/4/PMIM038/22

ENQUIRIES: Gunther Frantz

DATE: 03 October 2022

The Director
Amathemba Environmental Management Consulting
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TYGERVALLEY
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For Attention: Ms Ingrid Eggert

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PER EMAIL

Dear Madam

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A WASTEWATER TREATMENT WORKS AND ASSOCIATED INFRASTRUCTURE FOR LACTALIS FACTORY, ON REMAINDER OF FARM NO. 695, BONNIEVALE

The Directorate: Pollution and Chemicals Management (D: PCM) acknowledges receipt of the Draft Basic Assessment Report (DBAR) on 30 August 2022. Please find comment from the D: PCM as follows:

1. The D: PCM is aware of the current practices, where partially treated effluent is stored and irrigated on surrounding land approximately 3km south of the factory. Excessive irrigation over time has resulted in over irrigation and excessive volumes of effluent build-up in the subsurface resulting in a perched water table and ponding at the surface with sub-standard effluent. This also resulted in contaminated run-off flowing from the saturated irrigated area towards the Breede River during periods of heavy or continuous rainfall in winter.
2. Given the current effluent disposal practices, as stated above, the D: PCM supports the construction of a Wastewater Treatment Works (WWTW) to adequately treat the factory's effluent to acceptable levels, i.e. treated to the Department of Water and Sanitation's General Limit values.
3. The D: PCM is of the view that the proposed WWTW will result in the production of improved effluent quality and consequently improved effluent quality that will be discharged to the Breede River and irrigation area.

4. It is essential that the proposed mitigation measures detailed in the Freshwater Impact Assessment (Appendix G4) are implemented and adhered to.
5. The D: PCM supports the actions contained in the Effluent Management Plan – Operational and Maintenance Phase (section 4.3) as contained in the Environmental Management Programme (EMPr). The effluent monitoring plan, which is to be compiled, should ideally be included with the final EMPr submitted for decision-making. Any results pertaining to the effluent monitoring plan must be stored in a reliable and accessible location and made available to the authorities, including D: PCM, on request.
6. Furthermore, the recommendations of the Groundwater Impact Assessment (Appendix G2) are supported with the continued implementation of a groundwater monitoring programme, which must include the installation of an additional borehole at the WWTW site, with monitoring undertaken on a quarterly basis with results similarly stored and made available to authorities on request.

Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided.

The Department reserves the right to revise or withdraw comments or request further information based on any information received.

Yours faithfully,

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MR. ZAYED BROWN

HEAD OF COMPONENT: POLLUTION MONITORING AND INFORMATION MANAGEMENT

CC: D'mitri Matthews (DEA&DP – Directorate: Development Management (Region 1))

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