



**REFERENCE:** 16/3/3/1/B1/4/1054/22

**DATE:** 3/10/2022

The Board of Directors  
Lactalis SA (Pty) Ltd  
Strand Road  
**STELLENBOSCH**  
7600

**Attention: C. Fagan**

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Dear Madam

**COMMENT ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (GN NO. 326 OF 7 APRIL 2017) FOR THE PROPOSED WASTEWATER TREATMENT WORKS ("WWTW") AND ASSOCIATED INFRASTRUCTURE FOR LACTALIS FACTORY ON THE REMAINDER OF FARM NO. 695 BONNIEVALE**

1. The draft BAR dated August 2022, as received by the Department on 30 August 2022, refers.
2. Following review of the information submitted to this Department, the following is noted the proposal will entail the following:
  - A WWTW with the capacity to treat a maximum of 2 500m<sup>3</sup> of waste effluent per day with a development footprint of approximately 10 277m<sup>2</sup>. The WWTW comprises of the following:
    - Inlet channel and screens to remove coarse material. Two skips are proposed to temporarily store coarse and fine screenings.
    - Equalisation/buffer dam that can cater for 24 hours production (2500m<sup>3</sup>), which will serve to equalise the pH and overall composition of the effluent prior to the treatment process.
    - A Dissolved Air Flotation ("DAF") unit that will be housed in a brick wall structure with an Inverted Box Rib ("IBR") roof cladding with the associated tank blower, drywell for feed pumps, a sump, vertical shaft mixers, decanter feed pumps, decanter units, polyelectrolyte makeup unit, poly dosing pumps, laboratory, staff amenities, control room , motor control room ("MCC") and standby generator.
    - A Clarifier (26m round concrete structure).
    - An Activated Sludge Reactor with mechanical slow speed surface aerators. This rectangular concrete structure will be divided into two zones, i.e. an aerobic zone and an anoxic zone. The reactor also includes smaller structures like a recycle chamber, Recirculating aquaculture systems ("RAS") recirculation sump, WAS extraction sump, deaeration tank and an activated sludge contact zone.
    - A Service Water Tank.
    - A yard including a skip collection area for solid by-products and parking.

- The following associated infrastructure form part of the proposal:
  - A compacted gravel access road of approximately 580m in length with a maximum width of 8 m. Allowance will be made for stormwater side drains. Approximately 165m of the road comprise an existing gravel road.
  - An approximately 1500m long service trench of approximately 2m wide with additional allowance of 2m on either side (6m in total) given the non-granular nature of the subsurface material. The trench will house:
    - A rising main of approximately 1500 m in length, 273 mm diameter and throughput capacity of 2500m<sup>3</sup>/day (28l/s), to carry untreated effluent from the factory to the new WWTW;
    - A pipeline of approximately 1500m in length, 273mm diameter and throughput capacity of 2500m<sup>3</sup>/day (28l/s), to convey treated effluent from the WWTW to the discharge point at the Breede River (at the factory riverbank);
    - Electrical supply cable (1000kVA). The supply will tap off from the overhead line next to the R317;
    - A potable water supply pipeline (1500m long, 25mm diameter and 250ml/s throughput capacity).
  - Calamity/emergency temporary effluent retention dam of 2 000m<sup>3</sup> at the factory pump station. This will entail a semi-submerged, plastic-lined soil dam, which will normally be empty, only to be used in case of emergency to prevent contamination of the Breede River. This dam can accommodate 24-hours' worth of effluent production. Most repairs/biological rectification will be resolved within a 24-hour timeframe, however, as a backup, the effluent can also be pumped to the existing 600 000m<sup>3</sup> effluent storage dam for irrigation until the issue has been resolved. Trenches will be installed around the yard area where the calamity dam is proposed and where the existing pumping infrastructure is located. These trenches will serve to prevent river contamination in the event of a primary system failure.

### 3. Departmental comments on the draft BAR:

- 3.1 Activity 12 of Listing Notice ("LN") 3 is not applicable to the proposal, since Breede Shale Renosterveld is an ecosystem listed as least threatened in terms of Section 52 of the National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004) ("NEMBA").
- 3.2 Activity 14 of LN 3 is not applicable to the proposal because none of the Western Cape geographical triggers are applicable to the proposal.
- 3.3 It is noted that treated effluent will be discharged into the Breede River during certain periods of the year (April to August) and high flows measured upon confirmation of flow indicators by the Responsible Authority during other months. The existing irrigation area located approximately 3 km south of the factory will continue to be irrigated. The BAR must provide information about the existing infrastructure for the irrigation area or whether new infrastructure will be used for irrigation purposes. If new irrigation infrastructure is required, then the BAR should indicate whether any additional listed activities will be triggered.
- 3.4 A Maintenance Management Plan ("MMP"), for the future maintenance activities required for the discharge point into the Breede River must be compiled. The MMP must include:
  - 3.4.1 The frequency of maintenance activities to be carried out, i.e. during summer months or the months before the onset of winter; or after flooding events.
  - 3.4.2 The manner in which maintenance activities will be implemented. Method statements must be included in the MMP;

3.4.3 The access route to the site, if maintenance is carried out mechanically. (i.e. is the existing access to be used, or will a new access be created for the maintenance activity, and, if a new access is created, will the access be rehabilitated after maintenance activities are completed or will it be permanent).

4. Regulatory Requirements:

- 4.1 Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the final BAR.
  - 4.2 A dated photograph of erecting a site notice must be provided.
  - 4.3 Proof of placing an advertisement must be provided.
  - 4.4 Any new representations and comments received in connection with the application must be included in the final BAR.
  - 4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the final BAR.
  - 4.6 The minutes of any meetings held by the environmental assessment practitioner ("EAP") with I&AP's and other role players which record the views of the participants must be included in the final BAR.
  - 4.7 Please be advised that the signed and dated applicant declaration is required to be submitted with the BAR during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
  - 4.8 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making.
  - 4.9 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended).
5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.
6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Yours faithfully

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**HEAD OF COMPONENT**

**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc to: (1) I Eggert (Amathemba Environmental Management Consulting CC)

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