



**environmental affairs**

Department:  
Environmental Affairs  
**REPUBLIC OF SOUTH AFRICA**

**RISK MANAGEMENT PLAN IN TERMS OF REGULATION 10 OF WASTE EXCLUSION REGULATIONS**

<b>APPLICANT</b>	BADER SA (Pty)Ltd		
<b>SOURCE (S) OF WASTE</b>	Leather manufacturing and waste water treatment		
<b>WASTE TO BE BENEFICIATED</b>	Leather shavings Effluent sludge		
<b>BENEFICIAL USE/S</b>	<p>Bader SA is doing trials to find a way to divert the main portion of our waste (Leather shavings and Effluent sludge) away from Landfill to the benefit of the Environment by reducing over-utilization of landfill.</p> <p>Wet White Leather shavings and effluent sludge will be used as raw material in Fertilizer / Composting where as Wet Blue shavings will be used as Absorbent material in Spill kits.</p> <p>The re-use of leather shavings and effluent sludge will divert +/- 200 tons of waste from landfill on a monthly basis</p> <p>The projects will be community based where possible to uplift and assist smaller business to grow and prosper. Please refer to cover letter for the application.</p>		
<b>MSDS ATTACHED IF HAZARDOUS</b>	<b>YES</b>	<b>NO</b>	Waste classification for WB leather shavings attached Wet white and sludge, Type 3 waste Classifications attached.
<b>WASTE GENERATING FACILITY</b>	BADER SA (Pty) Ltd		
<b>PHYSICAL ADDRESS</b>	95 Hendrik van Eck street		
	Rosslyn		
	0200		
<b>GPS CO-ORDINATES OF WASTE GENERATING FACILITY (EG. 60° 29' 30" Latitude; 34°20'15" Longitude)</b>	<p>4 Corners of Bader SA (waste generating site)</p> <p>1 25° 37' 55" Latitude; 28° 5' 1.91" Longitude</p> <p>2 25° 37' 48" Latitude; 28° 4' 55.01" Longitude</p> <p>3 25° 37' 52" Latitude; 28° 4' 49.31" Longitude</p> <p>4 25° 38' 0.77" Latitude; 28° 4' 55.67" Longitude</p>		

<b>POSTAL ADDRESS</b>	P.O Box 911875		
	Rosslyn		
	0200		
<b>CONTACT PERSON</b>	Marinda de Beer / Heleen Manley		
<b>TELEPHONE</b>	012 797 7100	<b>CELL:</b>	078 803 5829 / 066 132 7375
<b>EMAIL</b>	<a href="mailto:Marinda.debeer@bader-leather.com">Marinda.debeer@bader-leather.com</a> <a href="mailto:Heleen.lmanley@bader-leather.com">Heleen.lmanley@bader-leather.com</a>	<b>FAX:</b>	

## RISK MANAGEMENT PLAN

### Storage, transportation, usage

Activity	Risk Description	Action(s) to minimize/ manage the risk	Responsibility (Who is responsible to carry out the action)
Storage of Waste at Bader SA	Leachate from stockpiled material during rainfall – pollution of ground or surface water	All waste stored in suitable conditions under roof in well maintained and dedicated storage facilities as per legal requirement.	Bader SA
Transport of leather shavings	Loose Leather shavings could blow off from truck during transport causing disruption to other vehicles /pollution of the environment	Leather shavings compacted. Shaving compactor to compact leather shavings into blocks to avoid shaving dust.	Bader SA
Transport of leather shavings	Loose Leather shavings could blow off from truck during transport causing disruption to other vehicles / pollution of the environment	Leather shavings to be suitably contained during transport. Suitable maintained bin of the correct size, not overloaded will be used. Transport bin covered with tarp. Transporter licensed to transport goods	Bader SA Transporter
Transport of effluent sludge	Watery sludge leaking onto vehicles or onto traffic during transport / transgression of road safety or pollution of the environment	Good condition Sludge casket / Honey sucker / Flow bins used to transport sludge with high moisture content Flow bins (if used) secured as per loading instruction for transport Transported licensed to transport goods	Bader SA Transporter

Delivery of leather shavings and effluent sludge at re-use facility	Leather shavings air-born when tipping the load into bunker at	Leather shavings compacted. Area for use to be banded / proper trenching to avoid overspill Hourly sweeping done using sweeping machine and proper housekeeping maintained at cement brick manufacturer	Bader SA Re-use facility
Storage of leather shavings and effluent sludge at re-use facility	Leachate of leather shavings and effluent when stored during rain at re-use facility	Area for use to be banded / proper trenching / well maintained tanks or bins to keep product to be controlled by re-use facility. Inspection will be conducted by Bader SA representative upon start of business.	Re-use facility Bader SA
Fertilizer / Composting / Spill kit absorbent materials re-use facilities	Dust Generation / Decaying / excessive heat from	Area for use to be banded / proper trenching / well maintained tanks or bins to keep product to be controlled by re-use facility. Facility competence to handle internal process to be established before start of business, Inspection will be conducted by Bader SA representative upon start of business.	Re-use facility Bader SA
Spill kit absorbent materials	Disposal of product after use	Instruction / service level agreement to be signed and adhered to that indicates the disposal requirement of used absorbent materials after use. Re-use facility to inform users and ensure that disposal of absorbent material is done in accordance to instruction in line with Bylaw and waste disposal regulation.	Re-Use facility
Storage of Bader SA excluded waste streams at re-use facilities	Transgression of Legal requirements for storage	Norms and standards for storage to applied to each beneficial use at any re-use facility, Inspection to be conducted to ensure that facility will manage storage in accordance to norms and standard.	Bader SA Re-Use Facility

**DECLARATION**

I, **M de Beer** hereby declare that I have read the completed a Risk Management form and hereby confirm that the information is to the best of my knowledge true and correct.

Furthermore, I declare that I am fully aware of my responsibilities in terms of the Waste Exclusion Regulations, and that failure to comply with these Regulations may constitute an offence in terms of the National Environmental Management: Waste Act, 2008( Act 59 of 2008).

Applicant (Full names) Maeinda de Beer  
Designation SHERO Manager  
Signature M de Beer  
Date 10/10/2023 Place Rossllyn

**FOR OFFICE USE ONLY**

Date Received				
Decision Taken	Authorised		Not authorised (provide reason)	
Reference Number				