



**forestry, fisheries  
& the environment**

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA

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

	(For official use only)
File Reference Number:	12/9/11
NEAS Reference Number:	
Date Received:	

Risk Assessment for an application for exclusion of Waste stream or portion of Waste stream in terms of the National Environmental Management: Waste Act, 2008(Act No.59 of 2008), as amended.

**Kindly note that:**

1. This form is current as of 01 April 2021. It is the responsibility of the applicant to ascertain whether subsequent versions of the form have been published or produced by the competent authority.
2. The information must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Spaces are provided in tabular format and will extend automatically when each space is filled with typing.
3. Incomplete forms (including information as required in the application form may be returned to the applicant for revision and the inclusion of additional information.
4. Unless protected by law, all information filled in on this application will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this application on request, during any stage of the application process.

<b>BACKGROUND INFORMATION</b>	
<b>APPLICANT</b>	Mondi South Africa Pty Ltd (Mondi)
<b>CONTACT PERSON</b>	Ms. C. Webb
<b>NAME</b>	Candice
<b>ADDRESS</b>	P.O. Box 1551, Richards Bay,3900
<b>E-MAIL ADDRESS</b>	<u>Candice.Webb@mondigroup.com</u>
<b>TELEPHONE</b>	035 902 2031
<b>CELL PHONE</b>	082 405 1688

<b>WASTE FACILITY OR FACILITIES</b>						
<b>SOURCE (S) OF WASTE</b>	Pulp and paper manufacturing process					
<b>WASTE TO BE BENEFICIATED</b>	— Green Liquor Dregs (GLD)					
<b>GPS CO-ORDINATES AT CORNERS OF WASTE GENERATING FACILITY OR FACILITIES</b>	<b>LATITUDE</b>			<b>LONGITUDE</b>		
	28°	45'	29.31" S	32°	0'	10.93" E
	28°	46'	11.78" S	31°	59'	55.52" E
	28°	45'	49.93" S	31°	59'	16.65" E
	28°	45'	17.36" S	31°	59'	36.004" E
<b>BENEFICIAL USE/S</b>	<ul style="list-style-type: none"> <li>— Used as an additive/ component material in the manufacture of commercial fertilizer</li> <li>— Treatment of low pH (Acidic) waste streams prior to disposal at registered landfills</li> </ul>					

<b>WASTE GENERATING PROCESS</b>		
<b>MSDS ATTACHED IF HAZARDOUS</b>	YES	<b>X</b>
<b>WASTE GENERATING FACILITY</b>	Mondi Richards Bay	

## RISK MANAGEMENT PLAN

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
1. Waste Handling and Storage	Soil Pollution and Pollution of water resources due to the release and spills into the surrounding environment, grounds, surface water and percolation into groundwater	<ul style="list-style-type: none"> <li>• Waste shall be stored in designated container or skip</li> <li>• The container/skip holding waste shall be properly stored in a secondary containment with hard-standing /impermeable floor base to prevent potential spillage into surrounding environment</li> <li>• Storage area shall be designed to separate leachate and dirty surface runoff from the clean storm-water system</li> <li>• The container levels shall be managed to reduce standing time in order to minimize the risk of spillages.</li> <li>• Good housekeeping standards shall be maintained</li> <li>• Accidental spills shall be cleaned up immediately.</li> <li>• All individuals working with waste material shall be sufficiently trained in disposal, handling, spill management and documentation of waste</li> <li>• Routine inspections shall be conducted on the waste containers and storage areas to check leaks and integrity of structures</li> <li>• Maintenance of waste storage areas and structures shall be conducted, as necessary</li> </ul>	Generator Receiving Site

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
2. Waste Handling and Storage	Health hazards associated with physical contact with waste and inhalation of waste mist or vapours	<ul style="list-style-type: none"> <li>• Safety Datasheets and Training shall be provided to ensure personnel are aware of Health and Safety risks associated with the waste material</li> <li>• Recommended Personal Protective Equipment (PPE's) shall be provided and worn to prevent exposure to waste hazards</li> <li>• Only authorized personnel shall be allowed to enter areas where waste is produced and stored.</li> <li>• Appropriate engineering control measures shall be implemented to manage waste vapours, as necessary</li> </ul>	Generator Receiving Site
3. Waste Handling and Storage	Mandatory legal compliance requirement: Waste Storage Facility Registrations in terms of NEM Waste Act, 2008 National Norms and Standards for Storage of Waste	<ul style="list-style-type: none"> <li>• The waste storage areas shall be registered with the relevant authorities as a Waste Storage Facility</li> <li>• The facility shall comply with the conditions of the National Norms and Standards for the Storage of Waste</li> </ul>	Generator, Receiving Site
4. Waste Collection, Transportation and Distribution	Potential Soil Pollution, Water pollution, Environmental and Health Hazards associated with accidental spills onto grounds and/or land and waterways	<ul style="list-style-type: none"> <li>• Accidental spills shall be cleaned, immediately. Emergency Preparedness Plan shall be employed to clean spills</li> <li>• Safety Datasheets and Training shall be provided to ensure relevant personnel are aware of Environmental, Health and Safety risks and requirements when dealing with waste</li> </ul>	Generator, Transporter, Receiving Site

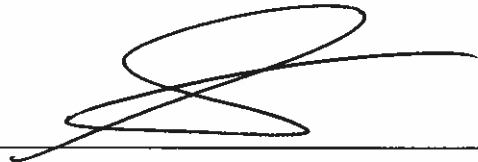
Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
		Implement safety requirements of Safety Datasheets to minimise personnel exposure to harmful constituents	
5. Waste Collection, Transportation and Distribution	Mandatory Legal Compliance requirement for transportation of waste	Waste shall be transported in accordance with the National Road Traffic Act 93 of 1996, associated Regulations and incorporate the South African National Standards (SANS) Codes of Practice into law, which are relevant to the transportation of hazardous waste.	Generator, Transporter, Receiving Site
6. Waste Collection, Transportation and Distribution	Mandatory Legal Compliance Requirement: Legitimacy of Waste Management and/or Waste Manifest System	<ul style="list-style-type: none"> <li>• Only permitted users shall be allowed to collect waste from generator premises</li> <li>• The Weighbridge Mechanism System shall be employed to record the amounts of Waste (number of loads and tonnages) distributed for reuse</li> <li>• Records of Waste Weighbridge Tickets, Collection notes and Signed Declarations shall be maintained and made available to the relevant authorities upon request</li> <li>• Regular inspections shall be conducted to ensure Waste Manifest Records are well maintained and not damaged or lost</li> </ul>	Generator, Transporter, Receiving Site
7. The use of waste in the manufacture of fertilizer	Mandatory legal compliance requirement with Regulations Relating to Fertilizers published in terms of	<ul style="list-style-type: none"> <li>• The Fertilizer and the manufacturing facility (in this case Njati Springs) must be registered with the relevant authorities</li> <li>• The Fertilizer manufacturing facility must comply with the conditions relating</li> </ul>	Receiving Site

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
	Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act No. 46 of 1947)	<ul style="list-style-type: none"> <li>• to applicable registration</li> <li>• The following Certificates must be made available to interested and affected parties: <ul style="list-style-type: none"> <li>○ Fertilizer Registration Certificate and</li> <li>○ Fertilizer Quality Analysis</li> </ul> </li> </ul>	
8. The use of waste as additive/component in the manufacture of commercial fertilizer	Mandatory legal compliance requirement in terms of Waste Exclusion Regulations: Social benefits established by using waste to manufacture fertilizer	<ul style="list-style-type: none"> <li>• Identify the number of established enterprise/s supported by the project</li> <li>• Identify / estimate the number of employment opportunities supported by the project</li> <li>• Identify / estimate the number of disadvantage individuals supported or benefited from the project</li> </ul>	Generator Receiving Site
9. The use of GLD in treatment of acidic Landfill waste	Mandatory legal compliance in terms of NEM: Waste Act requiring Waste Facility Registrations	<ul style="list-style-type: none"> <li>• The waste treatment facility (in this case Dolphin Coast Landfill Management, DCLM) shall be registered with the relevant (Environmental Affairs) authority</li> <li>• The Landfill operations must be done in accordance with the requirements of the conditions Waste Management License issued</li> <li>• The facility shall maintain records of waste manifest and report on SAWIS</li> <li>• Conduct leachate, surface and ground water quality monitoring on routine basis</li> </ul>	Generator Receiving Site

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
		<ul style="list-style-type: none"> <li>• Routine audits and/or inspections shall be conducted to monitor landfill operations and environmental impacts</li> </ul>	

I, C. Webb (the Applicant) hereby declare that I have read the completed Risk Management Plan 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).



Signature of the applicant<sup>1</sup>/ Signature on behalf of the applicant:

Candice Webb - Mondri Richards Bay M.II

Name of Applicant:

Head of Environment

Designation

23/02/2023

Date:

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<sup>1</sup> If the applicant is a juristic person, a signature on behalf of the applicant is required as well as proof of such authority.