



**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)
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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.

BACKGROUND INFORMATION	
APPLICANT	Mondi South Africa (Pty) Ltd – Merebank mill
CONTACT PERSON	Environmental Manager
NAME	Rafiq Gafoor
ADDRESS	P.O. Box 31024 Merebank,4059, South Africa <a href="http://www.mondigroup.com">www.mondigroup.com</a>
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WASTE FACILITY OR FACILITIES						
SOURCE (S) OF WASTE						
WASTE TO BE BENEFICIATED	<ol style="list-style-type: none"> <li>1. Recovery of biomass forestry by-products (tree tops, branches and stumps):currently in place.</li> <li>2. To be implemented after discussion with role players               <ol style="list-style-type: none"> <li>a. eThekweni Alien vegetation control program and tree felling activities by eThekweni residents.</li> <li>b. Wood waste (offcuts from timber industry, wood waste from other industry).</li> </ol> </li> </ol>					
GPS CO-ORDINATES AT CORNERS OF WASTE GENERATING FACILITY OR FACILITIES	<b>LATITUDE</b>	<b>LONGITUDE</b>				
	29 <sup>0</sup>	57'	35.8" S	30 <sup>0</sup>	58'	14.6" E
	29 <sup>0</sup>	57'	42.1" S	30 <sup>0</sup>	58'	11.8" E
	29 <sup>0</sup>	57'	33.1" S	30 <sup>0</sup>	57'	51.02" E
29 <sup>0</sup>	57'	25.5" S	30 <sup>0</sup>	57'	56.9" E	
BENEFICIAL USE/S	Fuel Feedstock in multifuel boiler for energy (heat and electricity) generation to substitute coal and reduce fossil fuel usage					

WASTE GENERATING PROCESS	
MSDS ATTACHED IF HAZARDOUS	
WASTE GENERATING FACILITY	

## RISK MANAGEMENT PLAN

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
1. Biomass collection	Legitimacy of biomass sources: Illegal trade in forest products/wood, as well as the illegal exploitation of natural resources posing a serious threat to the environment and overall unsustainable forestry management practices	Mill shall not procure indigenous biomass.	Biomass Suppliers
2. Biomass, Transportation	The effects of geographical location of biomass supply on the Green House Gases (GHG) emission efficiency of the final product	Mill's biomass procurement strategy makes it unfeasible for suppliers to transport biomass over > 200 kms.	Mondi South Africa (Pty) Ltd: Merebank mill
3. Biomass, Transportation	Biomass spills	All suppliers/ transporters shall transport biomass to the mill in vehicles that are covered or tarped. All suppliers /transporters shall have a spill management plan	Transporter
4. Biomass receiving	Contamination of other materials besides biomass Indigenous tress being received by the mill	<ol style="list-style-type: none"> <li>1. Only permitted users shall be allowed deliver biomass to the mill</li> <li>2. Security will inspect vehicle prior to mill access to ensure only biomass is delivered to the mill.</li> <li>3. The Weighbridge mechanism system shall be employed to record:               <ol style="list-style-type: none"> <li>a. Biomass types and tonnages</li> <li>b. Vehicle identification,</li> <li>c. Source and contact details of transporter</li> </ol> </li> </ol>	Mondi South Africa (Pty) Ltd: Merebank mill

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
		<ol style="list-style-type: none"> <li>4. The weighbridge scale shall be correctly installed and calibrated, certified, and where applicable available at all times</li> <li>5. Records of Weighbridge Tickets, Collection notes and Signed Declarations shall be maintained and made available to the relevant authorities upon request</li> <li>6. Regular inspections shall be conducted to ensure biomass records are maintained and not damaged or lost</li> </ol>	
5. Biomass Storage Operations	Soil and water pollution: Spillages onto grounds or land, the surrounding environment, Leachate and stormwater surface run-off from biomass stockpile	<p>Develop stockpile management plan and/or procedures to ensure Biomass stored in an environmental friendly manner. These shall include but not limited to following:</p> <ol style="list-style-type: none"> <li>1. Biomass shall be stored in designated Storage area</li> <li>2. Biomass storage area shall be suitable designed to prevent potential release into the surrounding environment.</li> <li>3. Ensure Biomass storage area are not overfilled to minimize the risk of spillages.</li> <li>4. Ensure good housekeeping standards</li> <li>5. Ensure accidental spills are cleaned up immediately</li> <li>6. Conduct routine inspections on the Biomass storage areas to check integrity of structures</li> <li>7. Maintenance of Biomass storage areas and structures shall be conducted as necessary</li> <li>8. The storage areas shall be suitable bunded with hard-standing</li> </ol>	Mondi South Africa (Pty) Ltd: Merebank mill

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
		<p>/impermeable floor base to prevent surface water and leachate impacts</p> <p>9. Prevent water logging of soil with digestate</p> <p>10. The Biomass storage system shall be designed to separate leachate and dirty surface run-off from the clean storm-water system</p> <p>11. Minimizing, containing and re-using wastewater, so there is no discharge of contaminated wastewater from premises. Otherwise ensure leachate and dirty water is appropriately disposed of via the authorized effluent drainage system.</p> <p>12. Monitor the quality of local surface water and groundwater on on-going basis for potential impacts of operations on local water resources</p>	
	<p>Air Quality impacts, Noise, Odours and Particulates /dust, Fire hazards/ Self heating and Potential spontaneous combustion of biomass stockpile</p>	<p>7. Correct management of stockpiles to prevent potential fires</p> <p>8. Avoid shredding on windy days</p> <p>9. Routine inspections shall be conducted on stockpile to identify possible self-heating</p> <p>10. Provide fire safety protocols. Appropriate Fire-fighting equipment / systems shall be installed and inspected on routine basis</p> <p>11. Emergency Preparedness Plan shall be developed and implemented to manage environmental incidents</p> <p>12. Manage stockpile level and standing time such that feedstock is used within ninety (90) days</p> <p>13. Ensure biomass storage areas are not overfilled</p> <p>14. Monitor local dust-fallouts and ambient air quality.</p> <p>15. Ensure good housekeeping to prevent pests and malodours</p> <p>16. Ensure aeration of material to prevent methane generation,</p>	<p>Mondi South Africa (Pty) Ltd: Merebank mill</p>

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
		17. Prevent waterlogging 18. Install and maintain silences on vehicles and equipment 19. Where possible noisy equipment must be housed within a building of similar structure	
<b>4. The use of Biomass for energy generation</b>	Indoor and Outdoor Air Quality impacts: air pollution particularly dust from biomass combustion	The Multi-fuel boiler (MFB) has abatement technology to remove dust and sulphur dioxide during combustion of biomass.	Mondi South Africa (Pty) Ltd: Merebank mill
<b>5. The use of Biomass for energy generation</b>	Sustainability and Energy self- sufficiently: Security for supply of biomass as a renewable source of energy.	Positive impact as biomass is a renewal resource The mill is committed to principles of circular economy.	Mondi South Africa (Pty) Ltd: Merebank mill
	Ecological and Economic impacts resulting from burning biomass for energy as an alternative destination for discarded biomass materials, rather than being sent to landfills	The combustion of biomass shall be controlled at the mills Multi-fuel boiler, which has been designed to burn biomass , coal , gas and coal ash for the generation of steam and electricity.	Mondi South Africa (Pty) Ltd: Merebank mill

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
	Ecological Atmospheric Impacts: Greenhouse Gases (GHG) emissions from production and use of biomass compared to fossil fuels	Scope 1 Greenhouse Gas (GHG) emission (because of fossil fuel combustion) will reduce by approximately 30%.	Mondi South Africa (Pty) Ltd: Merebank mill
	Social impacts: The effect of biomass re-use on social prosperities	The procurement of biomass from approved local tree fellers and Ethekewini will generate job opportunities for the community	Mondi South Africa (Pty) Ltd: Merebank mill

I, Donovan Naidoo (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:

Donovan Naidoo

Name of Applicant:

Operations Director Merebank

Designation

28/03/2023

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.