



**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 – Richards Bay mill
CONTACT PERSON	Candice Webb
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WASTE FACILITY OR FACILITIES					
SOURCE (S) OF WASTE	— Mondi Forestry Operations – Zululand Business Unit — Mondi Richards Bay Mill				
WASTE TO BE BENEFICIATED	— Biomass (Harvested Wood by-products + Effluent Fibre)				
GPS CO-ORDINATES AT CORNERS OF WASTE GENERATING FACILITY OR FACILITIES	LATITUDE	LONGITUDE			
	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				
BENEFICIAL USE/S	Biofuels for fluidized Boiler				

WASTE GENERATING PROCESS		
MSDS ATTACHED IF HAZARDOUS		
WASTE GENERATING FACILITY	Mondi Richards Bay Mill	

RISK MANAGEMENT PLAN

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
Waste Handling and Storage operations	Soil Pollution: Spillages onto grounds or land and the surrounding environment	<ul style="list-style-type: none"> Waste shall be stored in designated Storage Area / Bunker 	Generator, Receiving Site
		<ul style="list-style-type: none"> Waste storage areas/bunker suitable designed with bund walls to prevent potential spillages into the surrounding environment. 	Generator, Receiving Site
		<ul style="list-style-type: none"> Manage stockpile level and standing time. Ensure waste bunkers are not overfilled to minimize the risk of spillages. 	Generator, Receiving Site
		<ul style="list-style-type: none"> Ensure housekeeping. Ensure accidental spills are cleaned up immediately 	Generator, Receiving Site
		<ul style="list-style-type: none"> Conduct routine inspections on the waste storage areas or bunkers to check integrity of structures Maintenance of waste storage areas and structures shall be conducted as necessary 	Generator, Receiving Site
	Water Pollution and Health hazards: Leachate and surface run-off from	<ul style="list-style-type: none"> Waste storage areas /bunkers shall be suitable bunded with hard-standing /impermeable floor base to prevent surface -groundwater impacts 	Generator, Receiving Site

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
Biomass Handling and Storage operations	biomass stockpile Water Pollution and Health hazards: Leachate and surface run-off from biomass stockpile	<ul style="list-style-type: none"> The waste storage system shall be designed to separate leachate and dirty surface run-off from the clean storm-water system 	Generator, Receiving Site
	<ul style="list-style-type: none"> Leachate and dirty water is appropriately disposed of via the effluent drainage system. 		
	<ul style="list-style-type: none"> Biomass storage areas shall be visually inspected on routine basis to check integrity of the structures. Maintenance of Biomass storage areas and structures shall be conducted as necessary 		
	<ul style="list-style-type: none"> Monitor the quality of local surface water and groundwater ongoing basis in order to determine impacts of operations on local water resources 		
	Fire hazards: Self heating and Potential spontaneous combustion of biomass stockpile	<ul style="list-style-type: none"> Routine inspections shall be conducted on stockpile to identify possible self-heating 	Generator, Receiving Site
	<ul style="list-style-type: none"> Water sprinklers shall be employed on biomass stockpile in case of observed self-heating and/or during dry and hot weather conditions, as necessary 		
	<ul style="list-style-type: none"> Appropriate Fire-fighting equipment / systems shall be installed and inspected on routine basis 		

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"> Emergency Preparedness Plan shall be developed and implemented in case of Biomass fire incidents 	
	Air Quality impacts and Health Hazards associated with Odours and Particulates /dust emissions from biomass stockpile	<ul style="list-style-type: none"> Manage stockpile level and standing time. Ensure waste storage areas are not overfilled Ensure waste is wet to mitigate dust exposure Monitor local dust-fallouts and ambient air quality on continuous basis 	Generator, Receiving Site
	Mandatory legal compliance requirement: Biomass Storage Facility Registrations in terms of NEM Waste Act, 2008 National Norms and Standards for Storage of Waste	<ul style="list-style-type: none"> The biomass storage areas shall be registered with the relevant authorities as a Waste Storage Facility The facility shall comply with the conditions of the National Norms and Standards for the Storage of Waste 	Generator, Receiving Site
Biomass Handling, Storage, Transportation and Distribution	Environmental, Safety and Health Hazards associated Biomass handling and exposure	<ul style="list-style-type: none"> Safety Datasheets and Training shall be provided to ensure relevant personnel are aware of Environmental, Health and Safety risks and requirements when dealing with Biomass Implement safety requirements of Safety Datasheets to minimise personnel exposure to harmful constituents 	Generator, Receiving Site

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
Biomass Transportation and Distribution	Mandatory legal compliance requirement in terms of Waste Exclusion Regulations: Facility to demonstrate waste is managed in an environmentally-friendly manner- The facility required to develop and implement the mechanism to record the amount of Waste distributed to specific users	<ul style="list-style-type: none"> • Only permitted users shall be allowed to collect Biomass for removal from generator premises • The Weighbridge Mechanism System shall be employed to record the amounts of Waste (number of loads and tonnages) distributed for reuse • Records of Waste Weighbridge Tickets, Collection notes and Signed Declarations shall be maintained and made available to the relevant authorities upon request • Regular inspections shall be conducted to ensure Waste Manifest Records are well maintained and not damaged or lost 	Generator, Receiving Site
Biomass Transportation and Distribution	Air quality impacts, Water and Soil Pollution: Airborne waste and Accidental spillage into the environment	<ul style="list-style-type: none"> • Trucks shall be correctly loaded with no overfilling to prevent wind dispersion and spills • Accidental spills are cleaned up immediately 	Generator, Transporter, Receiving Site
The use of Biomass as Biofuel in Power Plants	Mandatory Legal Compliance requirement: Boiler registration in terms of the National Environmental	<ul style="list-style-type: none"> • Determine if Biomass Boiler installation requires registration – it does, already received environmental authorisation. • If applicable, complete required registrations relevant authorities. 	Receiving Site

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
	Management Act, 1998 List of Activities and Competent Authorities identified in terms of Sections 24(2) and 24 D		
	Indoor and outdoor air pollution from biomass combustion resulting to air quality impacts and Health related concerns	<ul style="list-style-type: none"> • Monitor and manage boiler emissions on continuous basis • Ensure boiler emissions comply with the published NEM Act, 1998 Minimum Emission Standards listed activity Subcategory 1.3: Solid biomass combustion installation • Monitor local ambient air quality on continuous basis and manage air pollutants to comply with atmospheric standards 	Receiving site
The use of Biomass as Biofuel in Power Plants	Mandatory legal compliance requirement in terms of Waste Exclusion Regulations: Social benefits established by using biomass as fuel to Power Plants	<ul style="list-style-type: none"> • Identify the number of established enterprise/s supported by the Biomass project • Identify / estimate the number of employment opportunities supported by the project • Identify / estimate the number of disadvantage individuals supported or benefited from the project 	Generator, Receiving site

I, Candice 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 applicant¹/ Signature on behalf of the applicant:

Candice Webb

Name of Applicant:

Head of Environment

Designation

03/01/2023

Date:

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