



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.

BACKGROUND INFORMATION						
<b>Applicant</b>	Illovo Sugar (South Africa) (Pty) Ltd – Eston Sugar Mill					
<b>Contact person</b>	Country SHERQ Manager					
<b>Name</b>	Shaun Ramsunder					
<b>Address</b>	PO Box 194, Durban, South Africa, 4000					
<b>E-mail address</b>	<a href="mailto:SRamsunder@ilovo.co.za">SRamsunder@ilovo.co.za</a>					
<b>Telephone</b>	031 508 4591					
<b>Cell phone</b>	084 554 9664					
WASTE FACILITY OR FACILITIES						
<b>Source (s) of waste</b>	Sugar cane					
<b>Waste to be beneficiated</b>	Filter cake					
<b>Gps co-ordinates at corners of waste generating facility or facilities</b>  <i>(Please note that the co -ordinates are of the filter cake area).</i>	LATITUDE			LONGITUDE		
	29°	52'	11.83"S	30°	31'	41.15"E
	29°	52'	11.86"S	30°	31'	41.53"E
	29°	52'	12.30"S	30°	31'	41.48"E
<b>Beneficial use/s</b>	Soil enhancer on sugar cane farms.					
WASTE GENERATING PROCESS						
<b>MSDS attached if hazardous</b>	YES ✓ Please refer to Annexue 1			NO		
<b>Waste generating facility</b>	HAZARDOUS ✓			GENERAL		

## RISK MANAGEMENT PLAN

Activity	Risk Description	Action(s) to minimise/manage the risk	Responsibility (Who is responsible to carry out the action(s))
Safety data sheet of the filter cake		<ul style="list-style-type: none"> <li>• It is the responsibility of staff that will be handling, transporting, storing, or working with the filter cake waste stream, to be made aware of the safety data sheet its contents, how to read it and where to obtain it.</li> <li>• Each party: generator, driver/owner, and recipient of the filter cake/mixture, are to have the latest, legal copy of the safety data sheet.</li> <li>• Training must be held for the contents and understanding of the contents for all relevant stakeholders.</li> <li>• Eston Mill must incorporate the safety data sheet into the waste management system and emergency management systems, and contents into the work instructions, together with training and include these into the induction program.</li> </ul>	<p><b>Eston mill staff</b></p>
Filter cake/mixture removal on demand	Storage over time and running out of storage space, if demand is low.	<ul style="list-style-type: none"> <li>• The monitoring of the filter cake/mixture demand must match the amount of filter cake/mixture that is stored on the platform in the mill. This must not build up and cause an overflow into the sludge dam. Should there be circumstances that would reduce the removal rate of the filter cake/mixture then the sludge dam level must be closely monitored to ensure this facility can cope with any overflow from the mill.</li> <li>• The tractor trailer must be maintained to prevent any break-downs and down-time. The farmer's demand for the product would be co-ordinated with the season that the fertilization of the fields is happening and hence be coordinated with the supply, to prevent build-up of the material.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Manager in charge of the storage area for the filter cake/mixture, the manager responsible for the sludge dam and the SHEQ manager.</b></li> <li>• <b>Manager responsible for the distribution of the waste.</b></li> <li>• <b>The production manager to know the quantity of waste generated.</b></li> </ul>

			<ul style="list-style-type: none"> <li>• <b>Instrument foreman.</b></li> </ul>
Access to filter cake/mixture storage area	<p><b>Security:</b></p> <ul style="list-style-type: none"> <li>• Unauthorised access.</li> <li>• Unauthorised removal of filter cake.</li> </ul>	<ul style="list-style-type: none"> <li>• Retain security and access control at the gates, boundary is secured and guarded by loading process which is within the Mill. The boundary is secured and guarded by a Security Management Organisation – Servest Security. Access to the Mill is restricted.</li> <li>• Checking for correct PPE.</li> <li>• Site induction covers the safety and health risks and requirements for entering the site. Induction to be renewed every year.</li> <li>• The SDS is to be given to each farmer and worker.</li> <li>• Works instructions to include the vehicle checks.</li> <li>• Security to check that there are no overfilled tractors when leaving the mill.</li> <li>• Systems to manage any breaches in security.</li> </ul>	<p><b>Eston Mill gate security - Servest Security</b></p>
Process of transferring filter cake/mixture from the storage area to the receiving vehicles.	<p><b>Dust:</b> Windblown from the process of filter cake transfer with front end loader.</p> <p><b>Spillage:</b></p> <ul style="list-style-type: none"> <li>• Onto area outside of storage area.</li> <li>• Onto personnel not authorised to be at the location.</li> </ul>	<ul style="list-style-type: none"> <li>• Keep the filter cake moist to minimise dust formation and hence the from being blown about by the wind.</li> <li>• Ensure that only the responsible personnel needed for the activity are in the area for the duration of the transfer.</li> <li>• Ensure correct PPE is used in the area as per SDS: appropriate clothing footwear and respiratory protection is worn that is appropriate to the dust that may be generated. Eye wash and safety shower station to be clearly demarcated and close by.</li> <li>• Careful management of the transfer of filter cake/mixture to vehicles.</li> <li>• Security SHERQ written works instructions for this procedure is very clear for limit of vehicle load, to minimise on-site and off-site spillage.</li> <li>• Clean-up of storage area with each batch of filter cake/mixture.</li> <li>• Ensure the area is cleaned at the end of the working day to minimise the chance of any oil grease or other materials to contaminate the mixture.</li> </ul>	<p><b>Manager responsible for waste and operations.</b></p>

		<ul style="list-style-type: none"> <li>• Clean up any litter and other materials that can contribute to the contamination of the filter cake.</li> </ul>	
Process of mixing the ash with the filter cake to make the fertilizer blend: on site	Dust and spillage from mixing with filter cake.	<ul style="list-style-type: none"> <li>• Ensure correct PPE is used is appropriate for the level of filter cake dust which may be formed and to prevent filter cake/mixture to be splashed onto the hands, skin, face and eyes.</li> <li>• Minimize wastage and spillage to reduce or eliminate any spillage into the sludge dams, or spillage outside of farm loading zones.</li> <li>• Loading zone of loading is by agreement with the client. it is routinely off-loaded in the area and applied by the clients discretion.</li> <li>•</li> </ul>	<b>Waste manager and operator that performs the mixing activity.</b>
Transporting of filter cake/mixture by tractor and trailer to farm	<p><b>Spillage:</b></p> <ul style="list-style-type: none"> <li>• Overfilling receiving vehicle trailer with filter cake/ash mixture.</li> <li>• Filter cake has a very strong odour.</li> <li>• Road accidents.</li> <li>• Non – compliance to the Road Traffic Act (RTA)</li> <li>• Soil contamination.</li> <li>• Affects the flora and local animals, domestic and wild as well as residents.</li> <li>• Natural water sources contamination.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure the driver is trained on the contents of the SDS and appropriate actions needed should an emergency arise.</li> <li>• Ensure vehicles are well maintained with service records available.</li> <li>• The condition of the vehicle is to be monitored by the on site garage to include regular maintenance, driver reports for any concerns on the vehicle performance, security gate personnel to check the vehicle condition when entering the gate.</li> <li>• Should there be any incident on the public road or on farm roads, an enquiry is to take place, to investigate whether any actions are needed.</li> <li>• Illovo Eston mill contact number must be clearly visible by outside persons for reporting of driver conduct.</li> <li>• Procedure for off-loading of filter cake/mixture in the designated drop-off zones. The protocol to ensure the off-loading vehicle driver knows the process for minimising the impact of the vehicle on the environment after completing the off-loading.</li> <li>• Driver to contact mill to clear up any spillages that occur on public roads.</li> </ul>	<b>Eston mill vehicle manager, driver supervisor and driver, security.</b>

		<ul style="list-style-type: none"> <li>• Have a hotline for public complaints for filter cake spillage and nuisance and register these on the SHE system. Address these with the responsible owner/driver and train the driver again.</li> <li>• Regular training and tool-box talks for the drivers of vehicles.</li> <li>• Emergency procedures clearly outlined with issuing of the SDS for the implications of accidents and clean-up.</li> <li>• Clean-up protocols sufficient for clean-up to deal with the maximum loads. Including clean-ups, barriers, fires, injuries, etc.</li> <li>• All outlined in the correct and updated SDS. Checks for correct driver emergency equipment and training to deal with the emergency.</li> <li>• Vehicles to comply with all requirements for Road Traffic Act.</li> </ul>	
Vehicle filter cake/mixture off-loading	<p><b>Spillage:</b></p> <ul style="list-style-type: none"> <li>• Outside of designated area.</li> <li>• Depending on the offloading procedure, the vehicle used to offload may spill residual mixture when travelling to other places to do work.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure that the filter cake/mixture is still moist to reduce the potential of windblown dust nuisance. Any run-off is redirected away any natural water source. This can be prevented by ensuring the riparian zone on the water course is intact.</li> <li>• The protocol for spreading onto the soils would be the same as any commercial fertilizer and lime additives to the soil management.</li> <li>• Ensure correct and appropriate PPE is used. Eye wash bottles to be available on the off-loading vehicle.</li> <li>• From a cradle to grave perspective the Mill would be responsible to ensure that no such fertiliser is offloaded or spilled in non-designated areas e.g. National road or entry point intersections or traverse areas.</li> </ul>	<b>Eston mill agriculture - MCP and user of the filter cake/mixture.</b>
Storage at end user facilities	Run off and possible windblown dust if mixture is allowed to dry. Unauthorized removal of material	<ul style="list-style-type: none"> <li>• Unauthorized removal of material is minimised by the farmer's internal security service by preventing trespassing in the property.</li> <li>• Farmer to plough in the filter cake immediately and not store on site; this also mitigates the fermentation odour.</li> </ul>	<b>Farmer.</b>
Filter cake/mixture management during distribution onto the intended	<p><b>Dust:</b></p> <p><b>Health.</b></p> <p>There may be health impacts from working with the possibly dried</p>	All staff in the field are to be supplied with the correct PPE and trained for application rates of the filter cake/mixture as well as correct placement within the area of the field. This is to keep the filtercake/mixture away from the possibility of run-off to cause pollution	<b>Farmer - property owner and field staff with field supervisors:</b>

farm soil as the fertilizer/soil enhancer.	<p>filter cake/mixture during the spreading of fertilizer operations.</p> <p><b>Environment:</b> Any mixture run-off from the mixture spreading operations will affect the receiving environment if not managed correctly, especially near to natural water sources.</p> <p><b>Heat</b></p> <p><b>Safety:</b> Fresh Filter cake retains heat that may cause minor burns</p>	<p>in the natural water sources. The same protocols would apply as to application of commercial fertilizer onto the fields.</p> <p>The Out grower and MCP client designates a loading zone which the filter cake is off-loaded routinely each day, the grower in turns distributes over their land at their own discretion.</p> <p><b>Heat Safety:</b> Allow the filter cake to cool off at the storage area before use, and keep away from the public. Unauthorised removal of material is minimised by the farmer's internal security service by preventing trespassing in the property.</p>	
Repeat application onto the same fields	<p><b>Environment:</b></p> <p>The soils may have salinity build up if the soils and application are not monitored</p>	<p>Ensure that the work is conducted with the inputs of a qualified agronomist that the soil viability is retained. To prevent salinity build up and correct pH management, as well as other specific soil requirements to keep the crop healthy.</p>	<b>Farmer, property owner and field staff.</b>
Secondary waste generation	<p><b>Environment:</b> Secondary waste generation would involve filter cake/mixture with a multitude of other contaminant items like litter, oils, grease, as well as other items if the storage sites are not managed..</p>	<ul style="list-style-type: none"> <li>• The management of the filter cake/mixture platform includes the monitoring of any oil, grease, other waste stream spillages that may contaminate the filter cake and filter cake waste. This would render them unusable on the farm. This includes the clean-up of litter. Should there be a spill on this area: immediately isolate the spill and clean it up, together with any contaminated ash, filter cake and filter cake/mixture. These contaminated streams are to be isolated and managed for as per SHEQ protocol.</li> <li>• Disposal is to be safe and legal.</li> <li>• NOTE: the waste must be pre-treated, as the pH is low at 5,6 and requires pre-treatment before disposal.</li> <li>• It is recommended to pre-treat the filter cake to a pH &gt;6,5 and &lt; 8,5 as recommended by the supporting report.</li> <li>• However, for use on the field, the guidance for management of the filter cake on the field must be sought from an agronomist.</li> </ul>	<b>Eston mill waste manager and SHEQ manager.</b>
Emergency responders		<ul style="list-style-type: none"> <li>• The SDS MUST be made available to these personnel, to be able to understand the requirements for their own protection and the management of any spill.</li> </ul>	<b>Eston mill waste manager and SHEQ manager affected staff:</b>

		<ul style="list-style-type: none"><li>• The drivers of the vehicles, are to be trained in how to respond SAFELY to any incident involving the load and who to contact in the case of any emergency.</li><li>• The driver must know the protocol to manage the incident: and who to contact: Owner, emergency responders – fire, and medical. First aid skill, as required at the level of the driver too.</li></ul>	
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I, S. Raminder (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:

SHARAD RAMSUNDAR

Name of Applicant:

COUNTY SHERIFF

Designation

17/05/2023

Date:

<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.

**Annexure 1:**

Safety Data Sheet

# Safety Data Sheet

Waste handling and transport, RSA. No OELs / BLVs.

by: **TALBOT**  
talbot.co.za | talbot@talbot.co.za 

Conforms to SANS 10234:2019, SANS 11014:2010  
SDS compiled: 2022/09/30. Valid until: 2027/09/29  
unless the applicable substance or mixture is altered  
Version: 1

SDS Compiler v20.09.10.05.1

**WASTE MIXTURE: SOLID**  
**ILLOVO SUGAR - ESTON MILL: FILTER CAKE**

## 1. Identification

### GHS product identifier

Trade name(s) : ILLOVO SUGAR - ESTON MILL: FILTER CAKE

Supplier product code : No data available.

### Other means of identification

Other synonym(s) : No data available.

Road & Rail PSN : NOT REGULATED

### Relevant use(s) of the Mixture and restrictions on use

Identified use(s) : WASTE - intended for transport by road or rail, and disposal.

Uses advised against : WASTE - if a commercial product residue, not intended for original use. KEEP AWAY FROM clothing. DO NOT eat, drink or smoke when using this product. AVOID release to the environment. Collect spillage.

### Generator details

Generator name : Illovo Sugar South Africa (Pty) Ltd - Eston Mill

Generator address : District Rd R624, Eston, 3740

Contact title, name : Nancy Sutar

Phone number(s) : +27 (0) 83 504 3005

Alternative contact(s) : nsutar@illovo.co.za

### Emergency contacts

Contact title, name : Nancy Sutar

Emergency number(s) : +27 (0) 83 504 3005

After-hours number(s) : +27 (0) 83 504 3005

## 2. Hazards identification

### Classification of the Mixture per SANS 10234:2019

#### GHS hazard category : GHS hazard statements

Not deemed hazardous based on available information.

Hazards not otherwise classified : Not specified due to classification; apply reasonable care.

#### GHS hazard label elements

Symbol(s) : NONE - Not deemed hazardous based on available information.

Signal word : NONE - Not deemed hazardous based on available information.

#### GHS hazard statements

Physical

Not specified due to classification; apply reasonable care.

Health

Not specified due to classification; apply reasonable care.

Environmental

Not specified due to classification; apply reasonable care.

#### Precautionary measures label elements

General

No data available.

Prevention

P220 : KEEP AWAY FROM clothing.

P261 : AVOID breathing dust, fume, gas, mist, vapours, spray.

P262 : DO NOT get in eyes, on skin, or on clothing.

P270 : DO NOT eat, drink or smoke when using this product.

P273 : AVOID release to the environment.

## Response

P314 : Get medical advice / attention if you feel unwell.

P374 : Fight fire with normal precautions from a reasonable distance.

P391 : Collect spillage.

P301+P312 : IF SWALLOWED: Call a POISON CENTRE or doctor /physician if you feel unwell.

P304+P312 : IF INHALED: Call a POISON CENTRE or doctor/physician if you feel unwell.

P305+P351+P338 : IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P308+P311 : If exposed or concerned: Call a POISON CENTRE or doctor/physician.

## Storage

No data available.

## Disposal

P501 : Dispose of contents/container to an approved facility in accordance with all applicable regulations and landfill requirements per this safety data sheet's Section 13.

## Other

No data available.

## 3. Composition or information on ingredients

Substance/mixture : Mixture

Ingredient(s)	CAS/IUPAC/Other Name(s)	[C//SA] %	Classification (Regulation)
Filter cake	-	100%	-

Notes to above table: [C] Constituent component; [I] Impurity; [SA] Stabilising Additive; [NS] Not Specified; [O]

Hazardous ingredients : No data available.  
above cut-off levels

Other identifier(s) : No data available.

## 4. First-aid measures

**Where the manufacturer/supplier/generator was unable to specify relevant measures, SANS 10234:2019 precautionary statements have been used.**

Immediate actions : If exposed or concerned: Call a POISON CENTRE or doctor/physician.

Actions to be avoided : DO NOT eat, drink or smoke when using this product. AVOID release to the environment.

### First-aid measures

Inhalation : AVOID breathing dust, fume, gas, mist, vapours, spray. IF INHALED: Call a POISON CENTRE or doctor/physician if you feel unwell.

Skin Contact : KEEP AWAY FROM clothing. DO NOT get in eyes, on skin, or on clothing.

Eye Contact : DO NOT get in eyes, on skin, or on clothing. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

Ingestion : DO NOT get in eyes, on skin, or on clothing. IF SWALLOWED: Call a POISON CENTRE or doctor /physician if you feel unwell.

**Anticipated effects and symptoms summaries - see Section 11 for full explanations**

Acute effects : Not specified due to classification; apply reasonable care.

Delayed effects : Not specified due to classification; apply reasonable care.

Symptoms / effects : Not specified due to classification; apply reasonable care.

**Protection of first-aiders and notes for attending physicians**

First-aid protection : Not specified due to classification; apply reasonable care.

Physician notes : Get medical advice / attention if you feel unwell.

## 5. Fire-fighting measures

**Where the manufacturer/supplier/generator was unable to specify relevant measures, SANS 10234:2019 precautionary statements have been used.**

Unsuitable extinguishing media : Not specified due to classification; apply reasonable care.

Extinguishing media and methods : Not specified due to classification; apply reasonable care.

Specific hazards arising from the Mixture : Not specified due to classification; apply reasonable care.

Protection of fire-fighters : KEEP AWAY FROM clothing. AVOID breathing dust, fume, gas, mist, vapours, spray. Fight fire with normal precautions from a reasonable distance.

## 6. Accidental release measures

**Where the manufacturer/supplier/generator was unable to specify relevant measures, SANS 10234:2019 precautionary statements have been used.**

Personal precautions, protective equipment, and emergency procedures : KEEP AWAY FROM clothing.

Environmental precautions : AVOID release to the environment. Collect spillage.

Methods and materials : Not specified due to classification; apply reasonable care.  
for containment and for  
clean-up

Secondary disaster : Not specified due to classification; apply reasonable care.  
prevention measures

Additional information : Not specified due to classification; apply reasonable care.

## 7. Handling and storage

Safe handling : DO NOT get in eyes, on skin, or on clothing. DO NOT eat, drink or smoke when  
using this product. AVOID release to the environment.

Safe storage : Not specified due to classification; apply reasonable care.

Technical measures : Not specified due to classification; apply reasonable care.

Incompatible materials : Not specified due to classification; apply reasonable care.

Packaging : Not specified due to classification; apply reasonable care.

Additional information : Eating, drinking and smoking in work areas is prohibited. Remove contaminated  
clothing and protective equipment, and wash hands after use and before entering  
eating areas.

## 8. Exposure controls and personal protection

### Concentration and exposure limits

Permissible : Not specified due to classification; apply reasonable care.  
concentration

### Exposure controls and Personal Protective Equipment (PPE)

Engineered controls : Not specified due to classification; apply reasonable care.

Respiratory PPE : Not specified due to classification; apply reasonable care.

Hand / arm PPE : Not specified due to classification; apply reasonable care.

Eye / face PPE : Not specified due to classification; apply reasonable care.

Skin / body PPE : Not specified due to classification; apply reasonable care.

Hygiene measures : Not specified due to classification; apply reasonable care.

### Special conditions posing a hazard

Hazardous conditions : KEEP AWAY FROM clothing.

Additional information : Not specified due to classification; apply reasonable care.

## 9. Physical and chemical properties (whole waste mixture)

Appearance : Grey to black solid with visible mold

Odour : Fermented odour

Odour threshold : No data available.

pH, concentration : 5.6

Melting point : No data available.

Freezing point : No data available.

Initial boiling point : No data available.

Boiling point : No data available.

Boiling range : No data available.

Flashpoint : 93 °C - No Flash

Flammability : No data available.

Auto-ignition point : No data available.

Decomposition point : No data available.

Lower explosion limit : No data available.

Upper explosion limit : No data available.

Vapour pressure : No data available.

Evaporation rate : No data available.

Vapour density : No data available.

Density : No data available.

Bulk density : No data available.

Relative density, SG : No data available.

Solubility : No data available.

Partition coeff. (n-oct) : No data available.



Partition coeff. (water) : No data available.

Dynamic viscosity : No data available.

Kinematic viscosity : No data available.

Radioactivity : No data available.

## 10. Stability and reactivity

Conditions to avoid : Not specified due to classification; apply reasonable care.

Incompatible materials : Not specified due to classification; apply reasonable care.

Hazardous decomposition : Not specified due to classification; apply reasonable care.

Additional information : Not specified due to classification; apply reasonable care.

## 11. Toxicological information

### GHS Classification of Health Hazards

Acute toxicity : No data available.

Skin irritation/corrosion : No data available.

Eye damage/irritation : No data available.

Respiratory or skin sensitization : No data available.

Germ cell mutagenicity : No data available.

Carcinogenicity : No data available.

Reproductive toxicity : No data available.

Specific target organ toxicity - single exp. : No data available.

Specific target organ toxicity - repeated exp. : No data available.

Aspiration hazard : No data available.

Hazard	Ingredient	Result	Species	Dose	Time

Additional information : Generic hazard data used above.

## 12. Ecological information

### GHS Classification of Aquatic Environment Hazards

Acute aquatic toxicity : No data available.

Chronic aquatic toxicity : No data available.

Hazard to the ozone layer : No data available.

Hazard	Ingredient	Result	Species	Dose	Time

Persistence and degradability : No data available.

Bioaccumulation potential : No data available.

Mobility in soil : No data available.

PBT, vPvB summary : No data available.

Other adverse effects : No data available.

Additional information : Generic hazard data used above.

## 13. Disposal considerations

Current disposal prohibition/restrictions : Type 0, Prohibited Waste per GN R636 (5)(1)(b) Waste with a pH value of <6 or >12. Analytical value of: 5.6 pH.  
(1)(q)(ii) Waste with a moisture content >40% or that liberates moisture under pressure in landfill conditions, and which has not been stabilised by treatment. Analytical value of: 71 %.

Landfill Class (RSA) (subject to treatment) : Type 3 Waste: Class C Landfill (GLB+) per: GN R635 (7)(2)(d) - strictly subject to treatment due to GN R636 (5)(1) prohibited disposal: see above.

Future disposal prohibition/restrictions : Future Prohibited Waste per GN R636 (5)(1)(r)(iv) >6% Total Organic Carbon (TOC). Non-hazardous waste with analytical value of: 70 %. (Prohibited from: Aug 2028)

Safe, environmentally preferred disposal : Dispose of contents/container to an approved facility in accordance with all applicable regulations and landfill requirements per this safety data sheet's Section 13.

Additional information : Do not fly tip. Do not dispose into sewer, stormwater, or environment. Do not burn unless by means of compliant incineration practices.

## 14. Transport information

**Proper Shipping Name (PSN) for: Road & Rail (SANS 10228) | Air (IATA) | Sea Freight (IMO/IMDG)**

Road & Rail PSN : NOT REGULATED

IATA PSN : NOT REGULATED

IMO/IMDG PSN : NOT REGULATED

**Dangerous Goods Transportation: Road & Rail Requirements (SANS 10228:2012)**

UN number : -

Dangerous goods class (& Subsidiary) : -

Packing group : -

Special provisions : -

Packaging codes : -

Marine pollutant : No data available.

**Transport in bulk according to MARPOL 73/78 Annex II and the IBC Code**

Regulation : Not intended for sea freight.

Shipment approved : Not intended for sea freight.

Pollution name : Not intended for sea freight.

Pollution category : Not intended for sea freight.

Ship type : Not intended for sea freight.

**Additional information**

Additional information : No data available.

## 15. Regulatory information

Occupational H&S : Occupational Health and Safety Act (Act No. 85 of 1993)

Environment & Disposal : National Environmental Management: Waste Act (Act No. 59 of 2008)  
: GN R634 Waste Classification and Management Regulations  
: GN R635 National Norms & Standards for the Assessment of Waste for Landfill Disposal  
: GN R636 National Norms and Standards for Disposal of Waste to Landfill

Other (domestic) : National Road Traffic Act, 1996 (Act No. 93 of 1996)

Other (international) : No data available.

Classification & Hazard : SANS 10228:2012 The identification and classification of dangerous goods for communication transport by road and rail modes  
: SANS 10234:2008 List of classification and labelling of chemicals in accordance with the Globally Harmonized System (GHS)  
: SANS 10234:2019 Globally Harmonized System of classification and labelling of chemicals (GHS)

## 16. Other information

Compilation & version : 2022/09/30, Version: 1, Revision: -

Revision(s) : Not applicable

### Summary of Mixture Hazard Classification and Categories

Hazard Information : Not deemed hazardous based on available information.

### Summary of Mixture Hazard Statements

Hazard Statements : No data available.

Signal word : NONE - Not deemed hazardous based on available information.

Other : No data available.

## Disclaimer & Use

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