



BUSHMAN'S RIVER MOUTH

Ratepayers' Association / Belastingbetalersvereniging Ward 3 / Wyk 3
P.O.Box 50, Bushman's River Mouth, 6190

11th October, 2007

Municipal Manager
Ndlambe Municipality
P.O.Box 13,
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Comments on the Draft Integrated Waste Management Plan for Ndlambe, Sept. 2007

There is only a single opportunity to establish a first class IWMP. Best practices should be adopted and consultation with other areas in RSA which have had similar problems in the recent past should be consulted i.e. Cape St Francis and Knysna. Most of what is in the Cannon Rocks/Boknes/Busmans/Kenton/Alexandria (Ndlambe west) area is illegal in terms of the law. Immediate steps should be taken to rectify the situation to manageable levels in the next year with the introduction of legal requirements and temporary permits. A large integrated waste site needs to be identified and planned for the Ndlambe west area. This site should go through the whole EIA process with all requirements and visionary facilities for waste recycling.

- 1) **The draft plan is fundamentally incorrect** as the population statistics were inaccurate. The growth statistics and projections are flawed and the basic refuse generation projections based on poor data are therefore flawed. Illustrative of this are the following:-
 - a) The current population data table section 2.1 does not agree with table 7 on page 53. It is known that the census data on which most of these assumptions were made was inaccurate. There is nothing to verify the data i.e. year on year increase in electricity use, water use, number of houses, erven, building plans passed, numbers of squatters or developments. New or proposed developments in Appendix E are not integrated with the main body text of the document. There is no data on RDP houses
 - b) In the BRM, Cannon Rocks, Boknes, Kenton and Alexandria areas there is a flat rate of population growth of 0.75% for all areas. This is not best practice as development should be measured by rate of growth of new houses, erven, water use and electricity consumption (these figures should be readily available over the past 5 to 10 years). Growth in Alexandria is radically different, for example, proportionately to BRM. Simple spreadsheet multipliers based on incorrect baseline information just lead to greater errors p53. The growth needs to be measured against real data.
 - c) There is no measurement data in the document and therefore projections are meaningless. A measured baseline, based on actual physical measurement, is fundamental to good planning.
 - d) The appendix E for numbers of proposed developments in Bushman's River is not correct. In addition to this there is no mention of the RDP developments in the Marcelle/ Ekuphumleni areas or any other area in Ndlambe west.
 - e) The influx numbers are inaccurate as there is no measured baseline. An estimate for influx over the season can be derived from the water consumption figures. The figures for Kenton/Bushmans/Marcelle/Klipfontein/ Ekuphumleni are approximately 1.5MI during the year and 3MI during the season which is a doubling of the population over that period. The peak season is only 3 weeks in endurance but there is a ramp up to 14th December and ramp down after 7th January. There is a smaller influx during other school holiday periods..
 - f) The tables on p21, p22 and p23 are therefore nonsense.
 - g) The current site at BRM measures 440m x 85m which is 37,400 sq m or 3.7Ha and not 1.5 Ha as stated.
 - h) Page 23 says there are 13 categories of waste but only 11 are listed. Building rubble and garden refuse which are the largest are not accounted for in the tables of Ndlambe waste stream composition.
 - i) Garden refuse is estimated at 0 .86 tons per day (p37) at the Kenton site. There are 5 gardening services using the site with 2 to 3 bakkie loads (some with trailers) each per

- day besides the private individuals and the municipal tractors and transfers from other areas. The figure is closer to 5 to 10 tons a day but may increase to 20 tons a day in spring and autumn and decrease to 2.5 tons in winter. This is a factor of 10 in inaccuracy.
- j) Building rubble and waste is of the order of 20 tons per day and with new developments and alterations in house plans this will increase exponentially. In the Ndlambe west area there are 1,200 new erven coming onto the market in Kenton/BRM alone. Boknes and Cannon Rocks is an additional 1,000 erven. This is besides the existing erven without houses or the 700 RDP houses in the current project. If there is any doubt look at the piles of waste at Summers Ridge, BRM.
- 2) The Bushman's Waste Site is illegal** and has been operated illegally since 2000. In terms of the law, it is currently no more legal than the Kenton site. Illustrative of this are the following:-
- a) There is no valid permit.
 - b) The original permit (valid for one year) was not operated in a legal manner in accordance with the ROD issued for one year in 1999. It was therefore illegal in terms of the ROD compliance regulations. Some of these illegal activities include that no burning was permitted, control had to be in place, the gates had to be locked etc etc.
 - c) The fence was not in place for an extended period of time and was only replaced within the last year. The gates are not locked and waste in the form of plastic bags etc are strewn in the surrounding farmland.
 - d) Drainage is inadequate and building rubble has now made the site a positive feature on the landscape.
 - e) The site was not originally permitted for building rubble at any time but is being now used as a building rubble site. All of the new developments will generate enormous amounts of rubble.
 - f) If the Kenton site is closed, which should happen immediately, the Bushman's site will not be able to cope with the garden refuse plus the building rubble.
 - g) The site is 75% filled and that is in the past 7 years. Growth has accelerated and it is not possible for 25% of the site to accommodate 6 years of accelerated waste that is generated. The building rubble addition has exacerbated the problem. The life of the current site is restricted to a maximum of 3 years. With accelerated building waste generated by all of the proposed new developments and the addition of waste from other areas and garden refuse the life of site could shorten to an estimate of 1 year.
 - h) The design of the site is incorrect with the trenches parallel to the prevailing wind.
 - i) The pollutants from the illegal burning at the Bushman's site blows directly onto the residences at Natures Landing and often fill the Bushman's River valley with toxic smoke.
 - j) P20 it is claimed that there is street sweeping and litter picking. This has not and does not happen at BRM.

3) Illegal Dumping was reported to the Ndlambe Municipality by the ward committee and by BRMRA. The officials claimed that they could not do anything about it and said it was not worth their while to investigate. The municipality was asked to put up signs with notice of amount of fines for dumping. Nothing was done. The municipal officials only suggested the road be closed where the dumping was taking place. Illegal mining of sand is taking place in the same area and the Ndlambe Officials suggested that the DME be contacted in this respect. The only way to stop illegal dumping is to provide sites for waste disposal and then to police and fine illegal dumping. Normally it is the building trade that is guilty of dumping but residents are also guilty to a lesser degree of dumping garden refuse in POS.

4) Recycling is a fundamental of good waste management and there is no planned introduction of waste recycling in the document. The time is opportune to introduce waste recycling. It is an education process and needs to be introduced over time. There may be questions as to cost and where and how recycling can be introduced but it is a magnificent opportunity to start a pilot scheme to iron out possible problems with recycling.

- a) The best place for recycling to start would be at source. Train the public, with incentives, to separate glass, metal, newspaper and organic waste into different colour coded bags. In England if waste is not separated it is not collected. Provide the bags FOC to community minded people.

- b) Large container sized bins can be provided for “storage” separated waste which would then be in economic quantities. A 12m container is less than R10,000 and could be used again and again.
- c) Garden refuse needs to be chipped and composted. Training in the correct method would be easy and the product could be sold.
- d) Building rubble could be recycled by crushing and screening. We are not talking about expensive crushers but simple jaw crushers. The graded product could be sold.
- e) Refuse compactors are short term transport solutions and will have a negative impact on recycling p62. They would not be needed in The BRM/Kenton node.

5) Goals and Objectives need to be revised.

- a) The Disposal Infrastructure Development needs to include the introduction of recycling. It would be pointless to upgrade the BRM site if it is going to run out of space in 2 years or less i.e. 2009. Either additional adjacent land would have to be bought or the site phased out and a new integrated site developed outside the urban edge. It would, however, be expedient to get the site properly managed with recycling asap.
- b) The waste collection infrastructure needs monitoring of vehicle maintenance and running costs which are absent from the document as a whole.
- c) Institutional capacity and human resource needs serious intervention. Bribery is common, moral is low and often if there is a public holiday in the week the staff will not collect on the scheduled day and will collect on the public holiday. This has become predictable.
- d) Financial resources. There is a substantial current surplus R2.7m. An appropriate, suitable financial tariff structure needs to be established. The tariff needs to be based on real data.
- e) Dissemination and communication firstly needs to measure and monitor, before any worthwhile information can be disseminated.
- f) Management of illegal activity has to be done by placement of skips, notices, policing and fines.
- g) Waste minimization must be done by recycling.

6) Disposal Infrastructure Development is in a crisis in the Ndlambe west area.

- a) Alternatives both short and long term need to be established.
- b) Short term sites for clean building rubble i.e. sinkholes like the one next to the entrance to the Kenton refuse site or the borrow pit between the R72 and Grahamstown Road.
- c) Introduction of chipping and compositing of garden refuse.
- d) Containers for recycling of metal, newspaper, glass and plastic.
- e) Phase out current BRM site within 2 years.
- f) Identify new IWM site, close to X roads Alexandria/BRM and Boknes. An alternative is Forest Hill Farm which is owned by Ndlambe.
- g) A full EIA for a new site and temporary legalization by compliance at the BRM site needs to be initiated. BRM site life could be extended if b), c) and d) introduced.
- h) All transfer stations need to be legalised and managed.

We hope that the comments are useful but recommend that urgent steps are taken make accurate measurements of current refuse generation so meaningful projections can be made into the future. In parallel, it is as urgent, to rectify the illegal status of all the Ndlambe west refuse related sites.

Yours faithfully,

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