



MUNICIPAL LANDFILL SITE AUDIT REPORT



AfriForum



PHOTOGRAPHER: PHILIP ROBINSON

Acknowledgements

A big thank you to AfriForum's staff and all the AfriForum branches across South Africa who have made this project possible.

Thank you to every individual member of AfriForum for your participation in this national project, and for sharing with us the vision of sustainable development and responsible waste management in South Africa.

Thank you also to every municipality providing guidance in South Africa and delivering excellent services by ensuring that waste is managed in a responsible manner,

thereby complying with appropriate legislation and licences for managing waste. These municipalities should be commended for protecting their communities and the environment against pollution and hazards.

Thank you to the Department of Forestry, Fisheries and the Environment's (DFFE's) Waste Management Division and the Minister who supported the project, assisted with the compilation of the new landfill site audit list and made their provincial task team available to participate in branch audits.

This report was prepared by Marais de Vaal and Lambert de Klerk.

This report is a project of AfriForum's original #CleanSA initiative, launched by AfriForum Community Sustainability's environmental affairs division.

Content

Introduction	5
Legal framework.....	6
Landfill sites	7
Classification of waste	7
The problem.....	8
Dangers of landfill sites	8
The project.....	9
The questionnaire.....	9
Audit requirements	9
Points allocation and pass rate.....	10
Results.....	12
2024 audit results: Overview	12
2024 audit results: National	14
2024 audit results: Eastern Cape	17
2024 audit results: Free State.....	18
2024 audit results: Gauteng.....	19
2024 audit results: KwaZulu-Natal.....	20
2024 audit results: Limpopo	21
2024 audit results: Mpumalanga.....	22
2024 audit results: Northern Cape.....	23
2024 audit results: North West	24
2024 audit results: Western Cape.....	25
What has been achieved so far?	26
Challenges at government level.....	26
Consultation with industry experts	27
Action plan and solutions.....	28
Action plan	28
Solutions	29
Summary.....	30
Addendum A: Audit scores of all landfill sites that were audited.....	32
EASTERN CAPE	32
FREE STATE	33
GAUTENG	34
KWAZULU-NATAL	35
LIMPOPO	36
MPUMALANGA	37
NORTHERN CAPE	38
NORTH WEST	39
WESTERN CAPE	40
Addendum B: Compliance and non-compliance with audit requirements	43
Addendum C: Landfill sites that passed the audit	44

Introduction

The #CleanSA initiative was launched in May 2014 by the civil rights organisation AfriForum, with the objective of bringing about positive change in the management of waste across South Africa by empowering communities with solution-driven approaches.

This initiative gave rise to the AfriForum landfill site audit report. This project determines the extent to which landfill sites in the municipalities in which AfriForum's 160 branches across South Africa are situated, comply with the requirements for waste management legislation and the licence conditions of landfill sites. In order to do this, landfill site audits were carried out in the relevant municipalities to determine whether the environmental, health and safety requirements for responsible waste management were being met. The audit results for each landfill were analysed and converted to a score out of 100 to measure the site's compliance performance. The results of these audits are collated in this report.

Every year AfriForum observes that few municipalities meet the requirements of the relevant waste management legislation and that there is a lack of accountability for proper waste management, monitoring and licencing by local authorities. Factors

such as inadequate waste management, the collapse of infrastructure, corruption, health and safety issues, and a shortage of space for the disposal of refuse (air space) are among the main reasons for the poor performance. This ultimately contributes to environmental pollution and endangers the health of communities.

Therefore, this project also aims to protect South Africans' constitutional rights as well as the ecology, by holding the responsible officials accountable and by fostering cooperation between communities and the three government spheres, which are the Department of Forestry, Fisheries and Environment (DFFE) on national level, the different provincial departments on provincial level, and municipalities on local level. From a waste management perspective, the latter is the most important, and it is also the level of government that operates closest to communities.

AfriForum plays a leading role in waste management in South Africa with this project, as it is the only organisation that publishes reliable data to the public regarding the true state of waste management in South Africa.

People live in shacks they erected on the Klerksdorp landfill site in the North West province.





An impeccable landfill site in Tzaneen with an operative weighbridge, fence and complete infrastructure

Legal framework

In terms of the South African Constitution, waste management is a service that must be provided by local governments.

The government is obliged by the Constitution to uphold the rights of all people in our country – such as the right to a safe environment as set out in section 24 of the Constitution – through organs of state that are responsible for the implementation of legislation on waste management. The government must introduce uniform measures aimed at reducing the amount of waste that is generated as well as ensuring that, where possible, waste is reused, recirculated and recycled in an environmentally friendly manner, or treated and disposed of in a safe manner.

The South African waste management strategy is based on a range of laws aimed at managing and preventing pollution of the environment. The relevant laws and associated regulations include, among others, the following:

- The Hazardous Substances Act 15 of 1973, which regulates the treatment and destruction of hazardous substances
- The Environment Conservation Act 73 of 1989 which provides for the protection and controlled utilisation of the environment:
 - Minimum requirements for waste disposal by landfill 1998 (minimum requirements), which addresses the classification, location,

design, operations and management of landfill sites

- The National Environmental Management Act 107 of 1998, which regulates authorities' decision-making about and management of activities that has an impact on the environment
- The National Environmental Management: Waste Act 59 of 2008, which regulates waste management in South Africa:
 - National norms and standards for the disposal of waste on landfill sites, 2013 (norms and standards), which state the national requirements for the disposal of waste on landfill sites
 - Regulations for waste classification and management, 2013, according to which different types of waste must be managed depending on the danger it poses to the environment and human health

According to section 9(1) of the National Environmental Management: Waste Act 59 of 2008, a municipality must use its executive authority to deliver waste management services, including waste disposal and the storage and destruction of waste, in such a way that it doesn't clash with national and/or provincial standards.

The Local Government Municipal Systems Act 32 of 2000 furthermore requires waste management services

to be provided to all local communities in a financially and environmentally sound manner to promote the accessibility of basic services as well as sustainable waste management.

Although the current South African legislation to manage waste properly seems to be adequate, it does seem

however that the appropriate legislation is neither applied nor enforced. As a result, the management of household waste in South Africa is currently facing many challenges, including law enforcement, management (among others financial and personnel management as well as the management of equipment) and institutional behaviour (management and planning).



Dangerous medical waste was dumped at the Springbok landfill site in the Northern Cape.

Landfill sites

A landfill site is a place where waste is dumped, levelled, covered with sand and left to decompose. Landfill sites are also called rubbish dumps, rubbish pits, rubbish heaps, rubbish tips or refuse dumps. These sites should be located in places where waste can be managed without harming people's health or damaging the surrounding environment. It is therefore illegal to dump waste in places that are not licensed or designated by the DFFE as landfill sites. There are however cases in rural areas with a low population density where community dumping sites or own rubbish pits can be used. These types of terrains do not require a licence, but they need to be visited by the local authorities regularly to ensure that they do not have a negative environmental or health impact.

A waste transfer facility is a facility that is used to accumulate and temporarily store waste before it is transported to a recycling, treatment or waste disposal facility.

Classification of waste

Although the relevant legislation sets specific requirements for the dumping of different types of waste, for example that certain categories of waste may only be dumped at landfill sites that meet specific standards, it is important for the purposes of this report to broadly distinguish between two categories of waste, namely general and hazardous waste.

1. General waste (also called household waste) is waste from urban areas, mainly from houses, offices and construction sites. This includes building rubble, garden refuse, waste from people's houses and other waste from towns and cities. The local authority is responsible for the collection, transportation and management of waste in urban areas. The local council must use a portion of the money collected from residents in their area to deliver this service. In other words: if you pay rates, you already pay to have your refuse removed. General waste is dumped at general landfill sites identified in official documents by the symbol (G) on official documents that were issued in accordance with the minimum standards, or as Class B on official documents that were issued in accordance with the norms and standards.

2. Hazardous waste is waste that can pollute the environment and harm people's health. This waste comes from factories, mines and hospitals and includes toxic substances (toxic waste), germ-bearing waste and explosive or easily combustible waste. Hazardous waste is classified from 1 (very hazardous) to 10 (slightly hazardous). This kind of waste may be dumped only at sites that are equipped for it.

Examples of hazardous waste include medical waste, animal carcasses, sewage or old tires, and these are not allowed to be dumped on a general landfill site.

This report focuses solely on municipal or private landfill sites for general waste. As hazardous waste is often present on some general landfill sites, examples thereof are highlighted in this report. However, it must

be distinguished from certain instances where small quantities of hazardous waste are dumped legally on municipal sites, especially medical waste that originates from households and ends up in municipal trash bins.

The problem

Waste from any urban community will not only create an aesthetic problem but can also pose severe health risks if it is not properly controlled. These risks are increased if the waste contains hazardous substances.

Local authorities can and should be held criminally liable for acts of negligence or pollution that affect people's health. Local authorities can also be held civilly liable for financial losses suffered by residents as a result of the municipality's mismanagement of waste, for instance where residents have to incur costs to clean up waste that was dumped illegally and that causes pollution.

The waste generated by people in towns and cities can be detrimental to people's health and the environment if:

- the landfill sites are located close to where people live;
- the landfill sites are poorly designed and developed (for instance where leached or toxic water gets into the groundwater reservoirs and rivers);
- the landfill sites are poorly managed (for example if the sites are not fenced, access control is not applied, animal carcases are lying around, fires regularly occur, or the waste is not covered with sand and compacted on a daily basis); or
- the waste is not taken to properly managed and licenced landfill sites but illegally dumped in open areas.

Dangers of landfill sites

There are a number of risks and dangers that people who live or work close to landfill sites are exposed to. These include:

- Landfill sites can be very unsafe, noisy, smelly and visually unattractive.
- Vehicles collecting or dumping waste can pose safety risks.
- Spontaneous combustion and fires on the sites can pollute the air.
- Pollution on the site can penetrate the surrounding natural water sources and soil.
- People can become ill if they inhale the polluted air, drink toxic water or eat food that has been grown in poisoned soil.
- People can develop cancer or asthma and other lung and chest diseases.
- Birth defects may occur and children growing up close to landfill sites can show stunted growth and be sickly.
- Landfill sites attract animals and insects that may carry germs and diseases, for instance rats, mice, and flies, and it can transmit these germs and diseases to people who come into direct contact with these animals and insects.



The project

Reliable data on the condition of South Africa's municipal landfill sites is not readily available to the public, even though (in terms of their licence conditions) almost all licenced landfill sites are supposed to allow an independent third party or organisation to audit the site annually. As community watchdog AfriForum is perfectly positioned for this, as the organisation's members in communities across the country can conduct inspections of their local landfill sites.

On AfriForum's request the DFFE's Director-General for Waste Management provided AfriForum with the contact details of the department's provincial waste management officials so that they could be invited to the landfill site audits. They are also available to assist AfriForum after the conclusion of the project. Municipalities are given written notice beforehand

and also invited to accompany AfriForum during the inspections.

In February 2024 AfriForum members from the communities where AfriForum's 160 branches across the country are based, conducted inspections at a sample of municipal landfill sites. Participants were accompanied by AfriForum provincial coordinators and where applicable, other stakeholders such as municipal officials and the media. They were encouraged to take photos as evidence to increase the credibility of the study.

In 2016 private landfill site companies approached AfriForum to evaluate the standards of landfill sites in the private sector. Since 2016, AfriForum has therefore been auditing the private sector's landfill sites as well, in order to compare their results with those of the state.

The questionnaire

Audit requirements

In order to get an indication of whether a landfill site meets the applicable legal requirements regarding waste management, an audit questionnaire was compiled based primarily on the minimum requirements. The audit questionnaire consists of 33 questions and covers the most important aspects of good waste management a landfill site (and where applicable a waste transfer facility) must comply with. An example of the audit questionnaire follows below.

Previously, the legally enforceable requirements that a landfill had to meet under the Environment Conservation Act 73 of 1989, were imposed through the issuance of landfill permits. When the National Environmental Management: Waste Act 59 of 2008 and the subsequent regulations came into force, the legal framework for the disposal of waste on landfill sites changed considerably. Landfill site permits were replaced by waste management licences, while the regulations for waste classification and management were implemented in 2023 to prescribe the regulations for the disposal of waste on landfill sites. Furthermore, the regulations expressly state that waste managers who dispose of waste to landfill sites must only do so in accordance with the norms and standards.

Given that the norms and standards had come into force, the validity of using the minimum requirements as a criterion for the 2023 audit has been questioned. AfriForum therefore requested an expert in waste management involved at the Council for Scientific

and Industrial Research (CSIR), Prof. Suzan Oelofse, to do a critical review of the minimum requirements. The objective of this study was to determine which of the requirements that are included in the minimum standards are also contained in the norms and standards, and whether there are other requirements that have been omitted from the norms and standards, but should be added as national standards to the norms and standards.

Prof. Oelofse is of the opinion that the minimum requirements still serve as a good criterion, as AfriForum's landfill site audit does not aim to be a comprehensive audit of all the relevant legal requirements, but rather to be an indication of the state of waste management at landfill sites (regardless the legal source of the audit requirements).

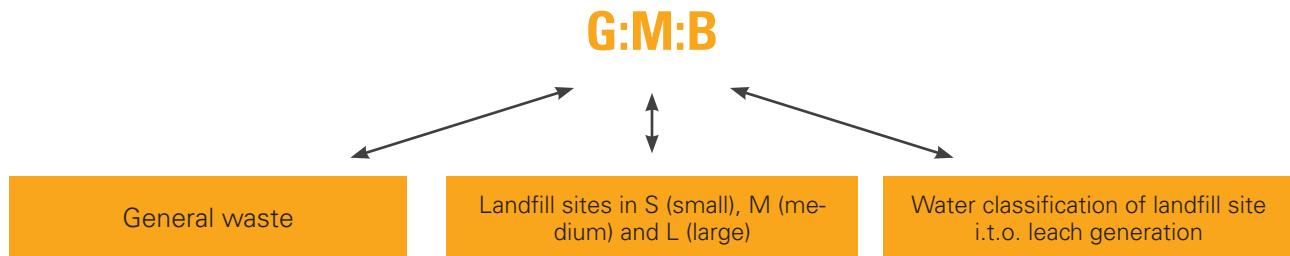
For this reason, AfriForum's Environmental Affairs team has decided for the 2024 audit to continue modelling the audit requirements primarily on the minimum requirements. AfriForum will launch an additional report in the coming months and announce ways on how the inadequacies in the norms and standards can be rectified in an attempt to improve the poor condition of landfill sites in South Africa.

One of the biggest challenges faced by participants who completed the questionnaire, is the fact that each landfill site has a unique permit or licence with requirements that can be even stricter than the abovementioned minimum requirements. Waste that is inadmissible in

terms of the legislation can for example be permitted according to certain conditions and requirements for a particular landfill site. A further challenge is that many landfill sites have no permit or license, because it could not originally meet the minimum requirements during the application process, leaving these sites stranded in a legal grey area.

In addition, landfill sites are categorised into three sizes – each with its own conditions. The general rule

is: The bigger the site, the stricter the requirements. This classification has been replaced by the norms and standards that came into effect in accordance with the minimum requirements. However, its use is justified for the purposes of this audit, because most – if not all – of the sites examined were established before the norms and standards came into effect. Accordingly, AfriForum decided to compile a questionnaire that can apply to any general (G type) landfill site. The classification system works as follows:



As the project grew over the years, AfriForum entered into discussions with organisations such as the CSIR and the Institute of Waste Management of Southern Africa (IWMSA) to determine what the industry's needs are and what the audit should focus on. This way, for instance, more specific data regarding the remaining lifetime of certain sites was also collected during the audit. Data that was collected this year includes:

- *How many informal recyclers are on the site? (0; 1 to 50; 50 to 100; 100 to 200; 200 or more)*
- *What is the intended capacity of the site (in m³)?*
- *How much of the intended capacity has been used to date?*
- *What is the remaining life span of the site before closure (in years)?*
- *What is the offset rate at the site (tons per day)?*
- *When was the last time the site was surveyed to determine the remaining capacity?*

Because site locations are not always indicated clearly on permits and licences, coordinates were included in the questionnaire to indicate where every terrain is located.

However, there is concern over the fact that almost all of the sites that were audited were unable to provide us with concrete data on the above-mentioned questions, and it was therefore decided not to include the table. This causes great concern and shows that there is no planning and management on ground level regarding the condition of landfill sites.

Points allocation and pass rate

33 questions with a total score of 25 points, had to be answered about the condition of the landfill site to determine whether or not the landfill meets the audit requirements. To pass the audit, a landfill site must meet at least 80% of the audit requirements and then strive to improve on the 20% non-compliance.

A final score was calculated by awarding one point for each category complying with the minimum requirements. The final score was multiplied by four to achieve a compliance score out of 100.

Example:

15 of the 33 questions (with a total of 25 points) comply with the audit requirements. (Please note: certain points carry more weight than others, depending on the importance of the specific requirement.)

Therefore:

$$15 \times 4 = 60\%$$

An action plan for municipalities that obtained a score of less than 80% will follow later in this report and is shared with the relevant municipalities.

An average audit compliance score was calculated for each province in which the landfill sites were audited

from 2014 to 2024. The compliance points that were allocated to each individual site in a specific province were added up, after which the total was divided by the number of sites in that province.

The conclusion can therefore be made that the waste management at landfill sites in this province had improved by 1% from 2014 to 2015.

Example:

In Mpumalanga, six landfill sites were audited in 2014 and 2015. Therefore:

$$76 + 8 + 40 + 64 + 32 + 64 = 284; \text{ therefore } 284/6 = 47\% \text{ average in 2014}$$

$$84 + 16 + 56 + 40 + 24 + 68 = 288; \text{ therefore } 288/6 = 48\% \text{ average in 2015}$$

Example of a questionnaire:

The questionnaire is divided into five **main** and **sub-categories**.

The sum total of the points for the questionnaire is 25. This can be multiplied by 4 to obtain the percentage (%) of the result.

Minimum requirement	Fully compliant	Partially compliant	Non-compliant	Comments	Score
1. Access and control	1	$\frac{1}{2}$	0		/ 8
1.1 Signs					
a) Signs in the appropriate official languages must be erected in the vicinity of the landfill, indicating the route to the landfill site from the nearest main roads.	x				$\frac{1}{2} / \frac{1}{2}$
b) Is there a sign at the gate indicating what type of waste can be dumped, as well as the operating hours of the site?		x			/ $\frac{1}{2}$
1.2 Road access					
a) Are all roads to the site and within the site maintained?			x		0 / 1

Score for main category

Weight of question

Mark with x in appropriate box. Use own discretion, with minimum requirement as outcome.

Comments are important for evidence, notes and additional information for discussions with authorities after the audit.

The Hatherley landfill site, just outside Pretoria in Gauteng



Results

This report enunciates the 2024 audit results. For comparison purposes, the 2019 to 2023 results were also included. The audit results of 2014 and 2018 have been omitted from this report but can be supplied on request. The questionnaire that was used from 2014 to 2016 is also different from the current one, which was revised and updated in 2017.

An overview of the results is described below, while the full compliance scores of all landfill sites that were audited are detailed per province in **Addendum A**, and consolidated in **Addendum B** to indicate the number of landfill sites that either passed (complied with 80% of the audit requirements) or failed the audit. **Addendum C** lists the landfill sites that passed the audit.

2024 audit results: Overview

The **2024** results can be summarised as follows:

- AfriForum has conducted a total of 1 367 landfill site inspections since 2014 and included their results in the audits. At the inception of the project in 2014 only 83 municipal landfill sites were audited, but efforts are being made to add more sites to the audit every year in order to obtain a more accurate overview of waste management at the country's landfill sites.
- In 2024 a total of 189 landfill sites were audited – 28 more than in 2023. Of these, 185 were municipal landfill sites and four were private landfill sites. Ten landfill sites were closed, and one was too unsafe for the inspection to continue.
- The national average compliance score in 2024 is 39,4%, which is not significantly different from the past six years where the highest national compliance score was 42,2% in 2023 and the lowest national compliance score was 38,1% in 2021.
- The province that had the highest average compliance score in 2024 is Gauteng (72,6%), followed by the Western Cape (59,8%). The province that had the lowest average compliance score in 2024 is the Northern Cape (13,2%), followed by the Free State (13,5%).
- Only 27 of the 189 landfill sites that were audited in 2024 (14,3%) complied with the audit pass rate of 80% of the audit requirements. This means that 162 landfill sites (85,8%) did not pass the audit. Of the sites that passed the audit, 12 are in the Western Cape, six in Gauteng, four in North West, two in the Eastern Cape, and one each in KwaZulu-Natal, Limpopo and

Mpumalanga. Refer to **Addendum C** where the landfill sites that passed the audit are listed.

- It also shows a deterioration compared to 2023's audit results, when 28 of the 161 landfill sites that were audited (17,5%) achieved 80% or more of the minimum requirements for landfill sites.
- Compared to 2023's results, Gauteng is the only province that showed a significant improvement in 2024, with an improvement of 9% (from 20% to 29%) of sites that achieved the audit pass rate of 80% or more.
- In contrast, KwaZulu-Natal (10% compliance) and Mpumalanga (4% compliance) remained mostly unchanged, while there was a decline in Limpopo (14% to 7% compliance), North West (22% to 17% compliance), the Eastern Cape (25% to 20% compliance) and the Western Cape (56% to 32% compliance).
- The worst performing provinces are the Free State and the Northern Cape. For the seventh consecutive year, not a single landfill site in the Free State has passed the audit, while for the second year in a row, the Northern Cape also had no sites that meet 80% of the audit requirements.
- The fact that only 14,3% of the landfill sites audited in 2024 could achieve a pass rate of 80%, (which means that only the minimum requirements for waste management were met) obviously suggest serious shortcomings in municipalities with regards to the systems and the persons who are responsible for proper waste management. The decline in the number of landfill sites that passed the audit in 2024 is also concerning if one takes into account that AfriForum had shared the 2023 results with the relevant municipalities as well as the Minister of the DFFE. It therefore appears that no active steps have been taken during the past year to address the shortcomings. While the DFFE writes ambitious, directional plans such as the integrated waste management plan (IWMP) at a national level, it is clearly not devolved to the local level, as the municipalities who are supposed to implement these plans are unable to do so due to their operational shortcomings.
- One remarkable observation was that several landfill sites that were supposed to be operational had closed down, while other sites that were supposed to have closed down (according to their licence conditions) were still operational. It is especially concerning because it is the second year in a row that this situation

was observed. There is even one site that is still operational despite receiving a notice back in 2013 that it had to close down.

- A further concern is the fact that a number of landfill sites that were supposed to be audited were too unsafe for an audit to be conducted due to a complete lack of safety and security. There was even an incident at one of the sites where informal recyclers attempted to get into the vehicle of the person who did the audit.
- AfriForum's structures were denied access to some of these sites by the municipalities involved, despite the fact that the minister of the DFFE approved the project in a spirit of cooperation.
- Answers to the additional questions that were included in the audit were incomplete, since most municipal officials were unable to supply the requested data. These questions were about the number of informal recyclers present on sites as well as their remaining air space. The fact that officials were unable to supply this information is concerning.
- It is worrying that most landfill sites keep no records of the volume and type of waste dumped there and that no forecasts are being made to plan for future management of the sites. It was also obvious that there are informal recyclers living on most of the landfill sites. This is an indication that landfill sites are not managed the way they should be, and it also poses severe health and safety risks for informal recyclers.
- This is just more proof that municipalities' ability to fulfil their obligations regarding waste management is almost completely non-existent. The DFFE will urgently have to start holding municipalities accountable.
- The DFFE's website for landfill sites was recently upgraded, but the records of the details and content of licences were inaccurate. Therefore, the number of landfill sites that comply with their licence conditions, for instance with regards to the construction of new cells according to regulations, should be questioned. Another concern is that municipal officials are not even aware of their own licence requirements.

Informal recyclers on a landfill site



2024 audit results: National

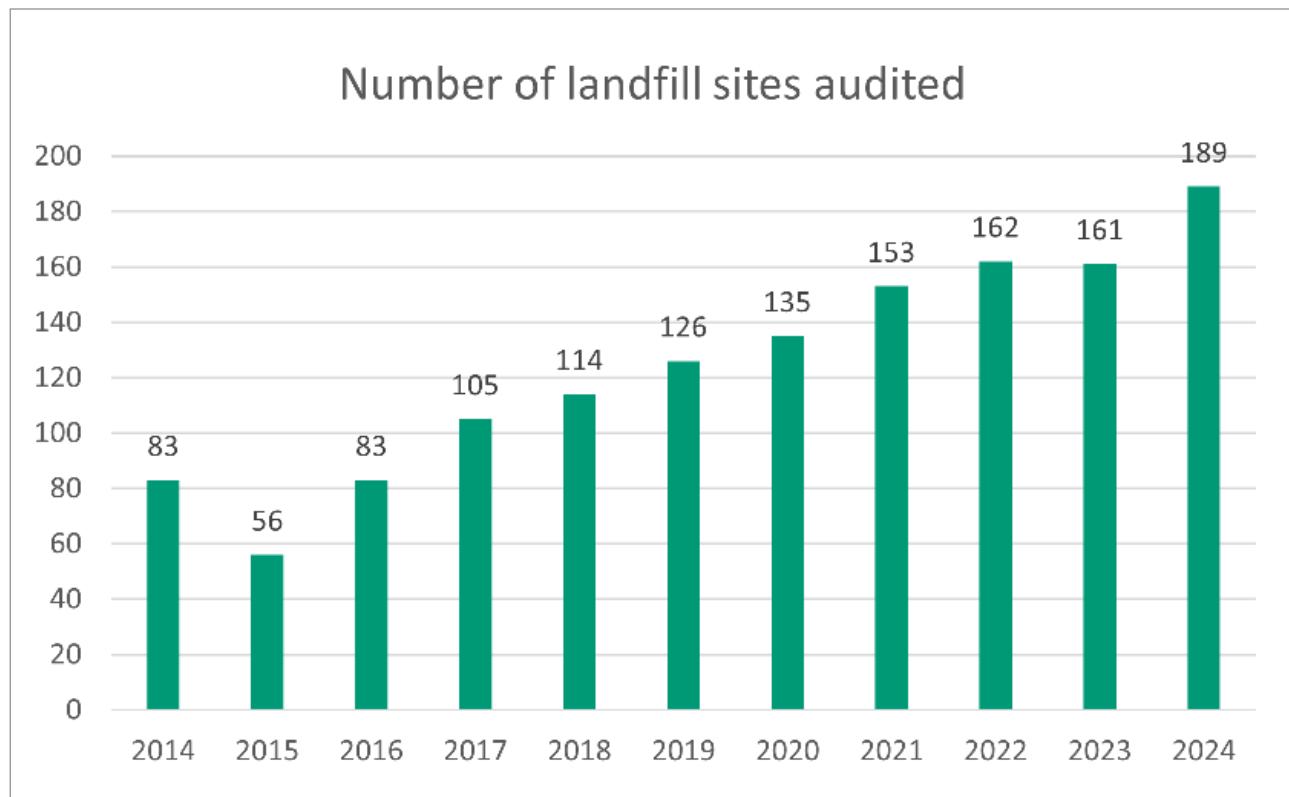


Figure 1: Number of landfill sites audited 2014–2024

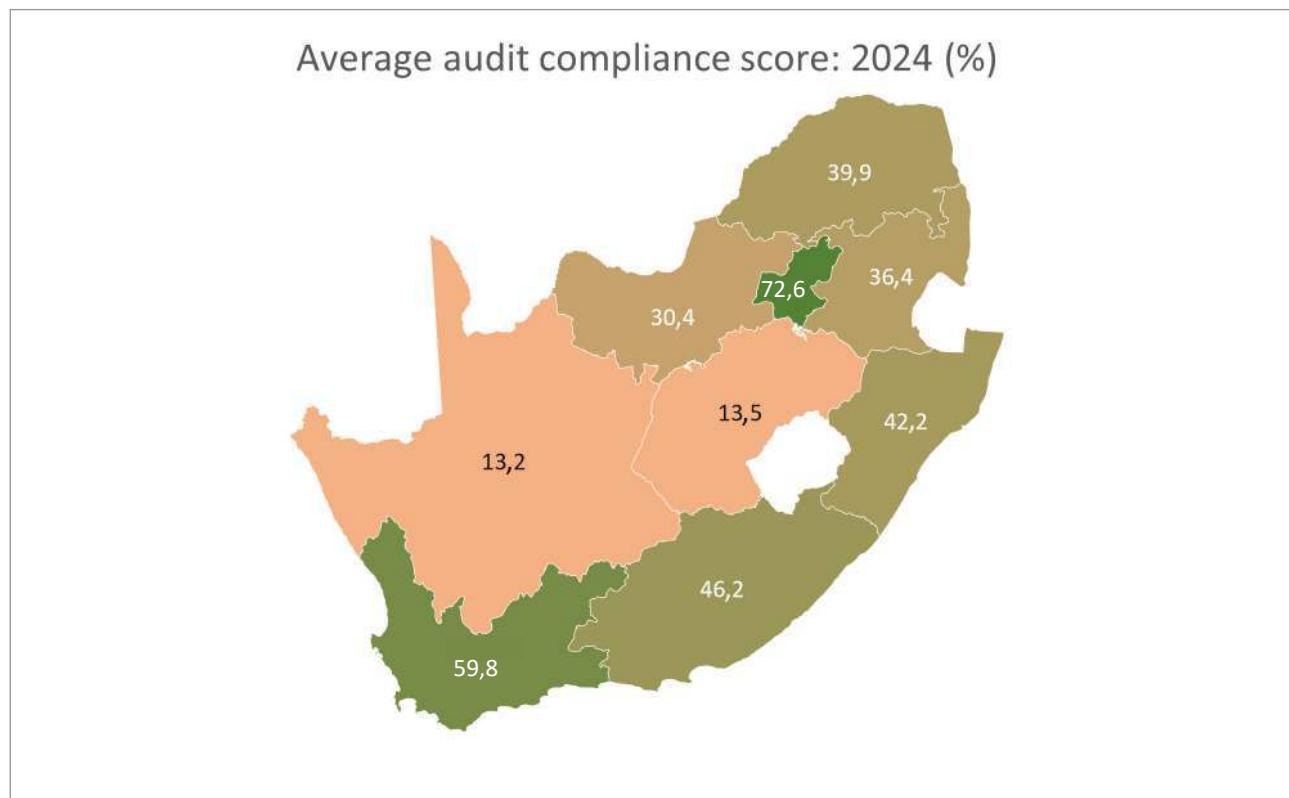


Figure 2: Average provincial compliance score: 2024 (%)

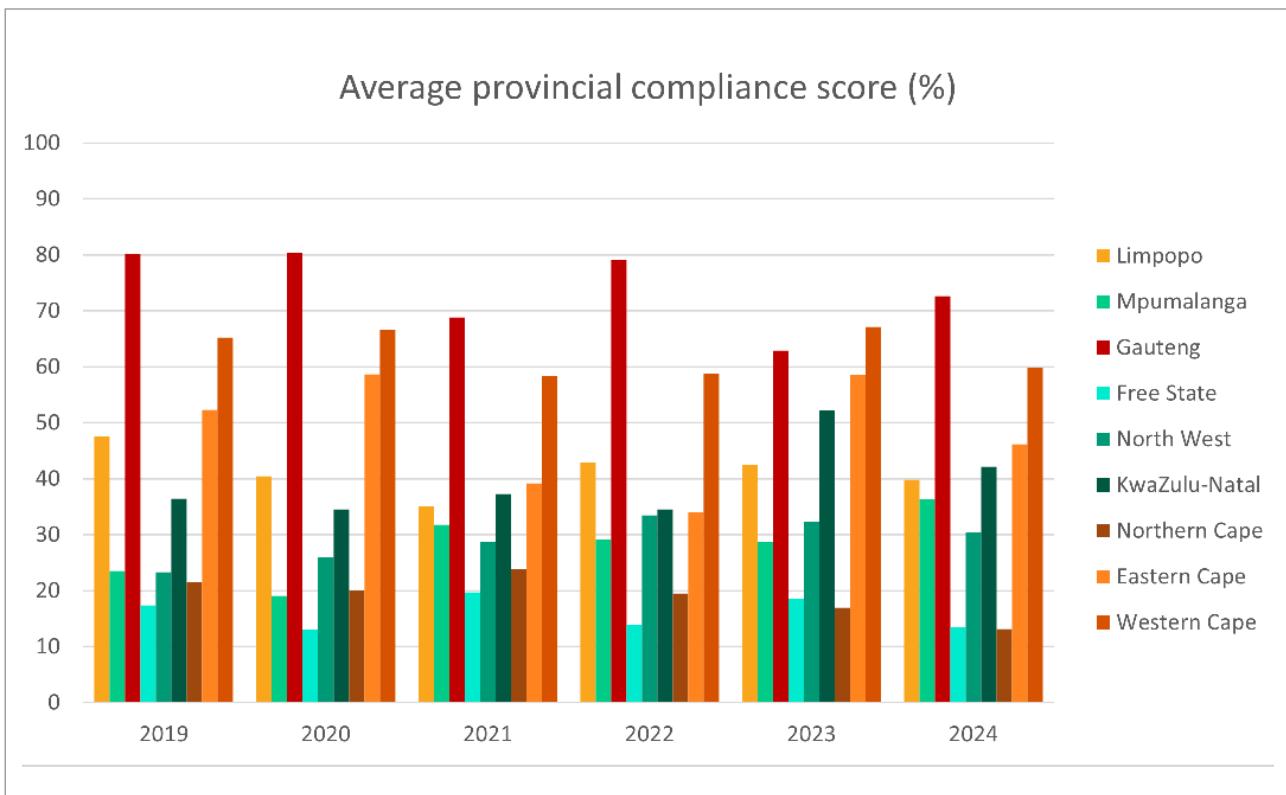


Figure 3: Average provincial compliance score: 2019–2024 (%)

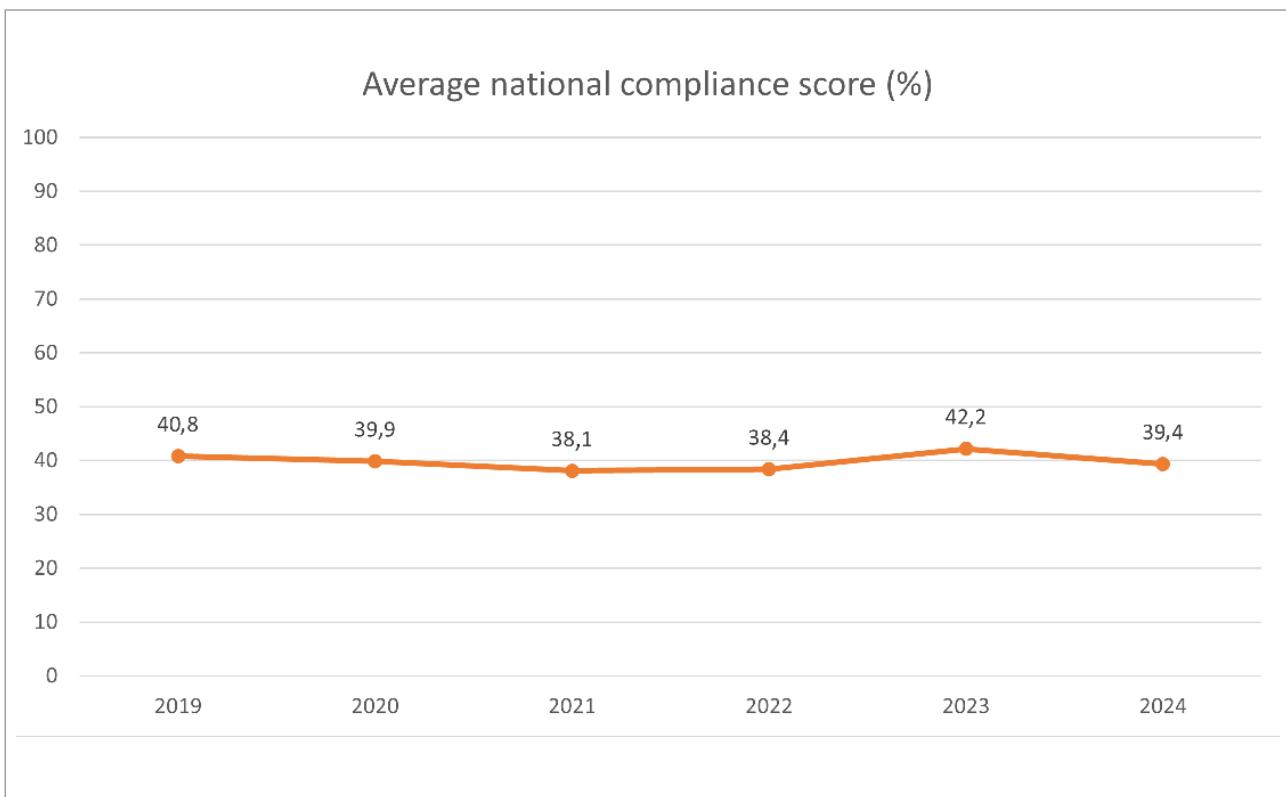


Figure 4: Average national compliance score: 2019–2024 (%)

Percentage of landfill sites that do not comply with 80% of audit requirements (2024)

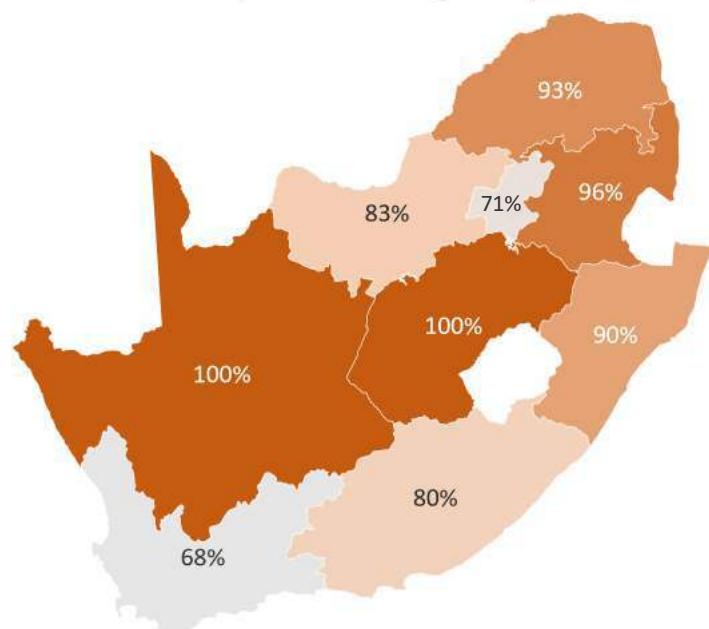


Figure 5: Percentage of landfill sites, per province, that didn't pass the audit (2024)

Compliance with audit requirements: National

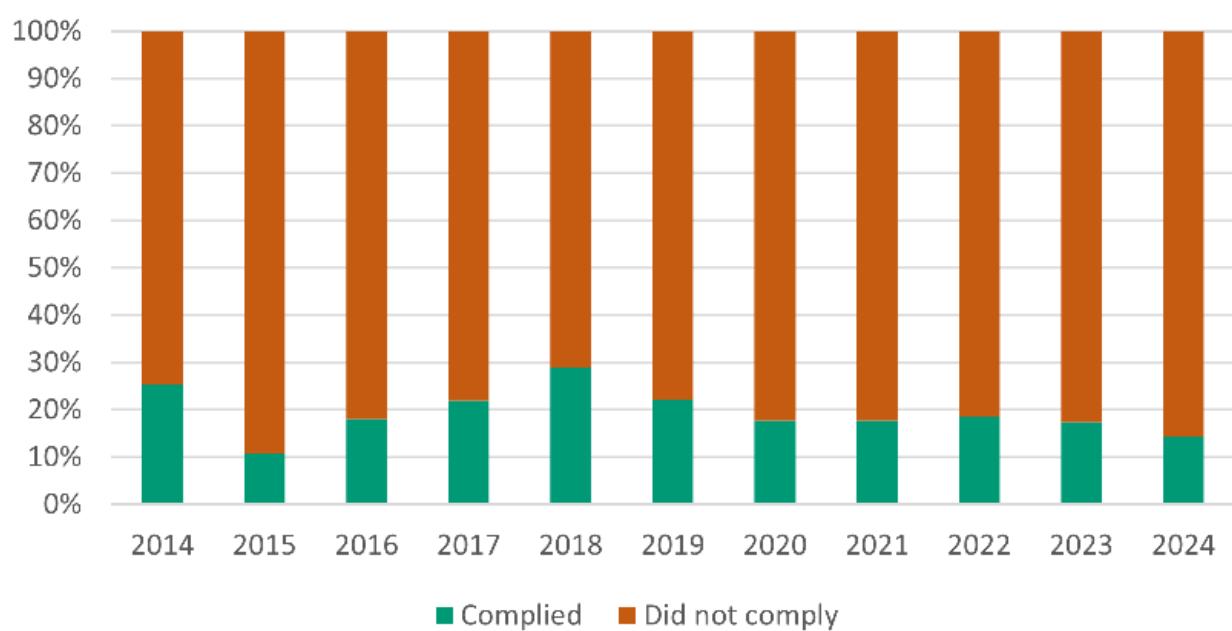


Figure 6: Percentage of compliant versus non-compliant landfill sites: National

2024 audit results: Eastern Cape

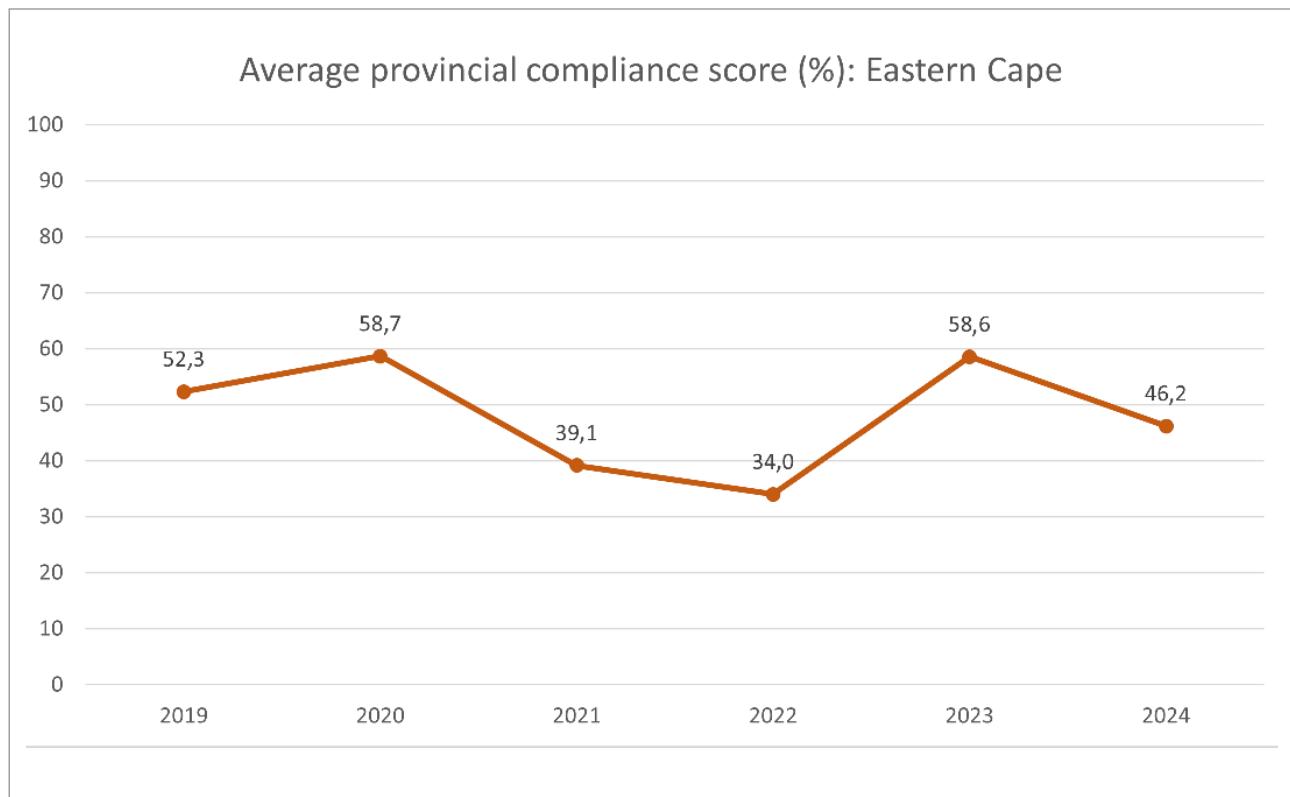


Figure 7: Average provincial compliance score: Eastern Cape

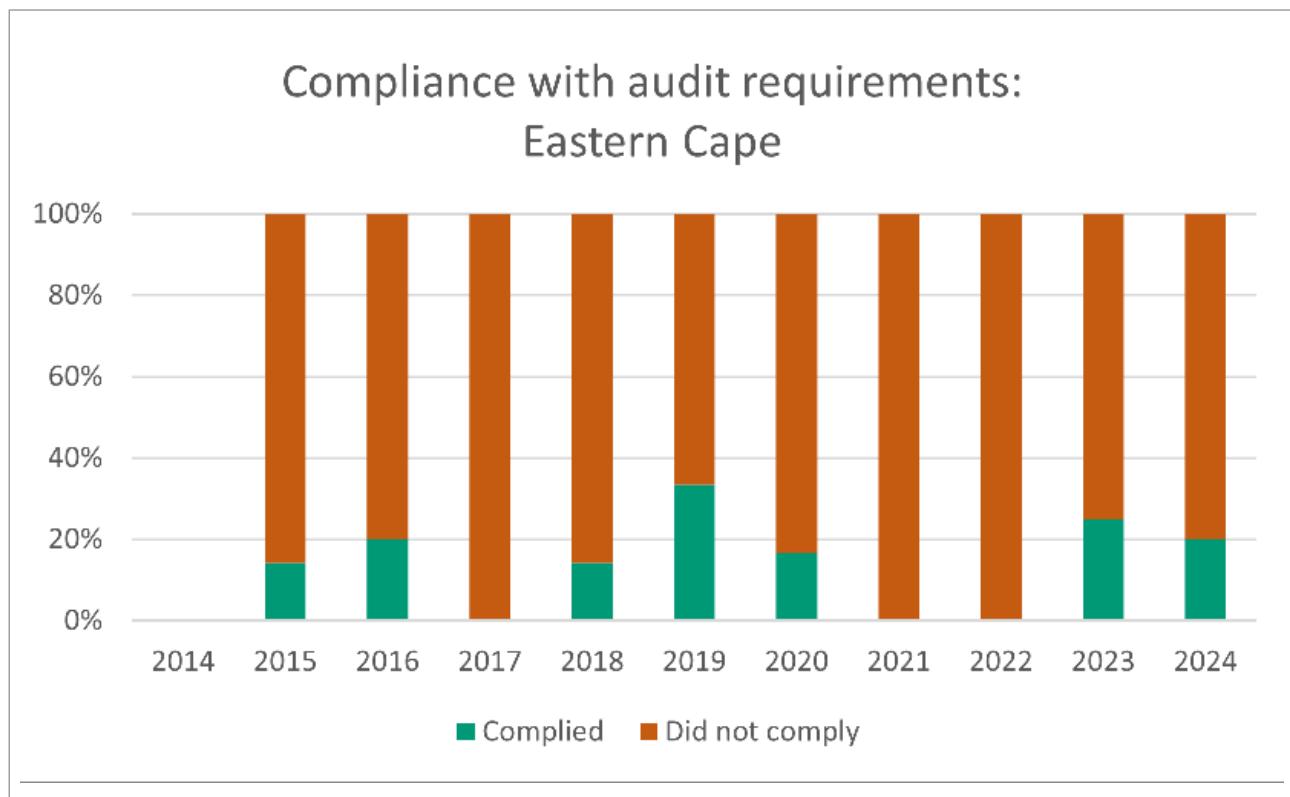


Figure 8: Percentage of compliant versus non-compliant landfill sites: Eastern Cape

2024 audit results: Free State

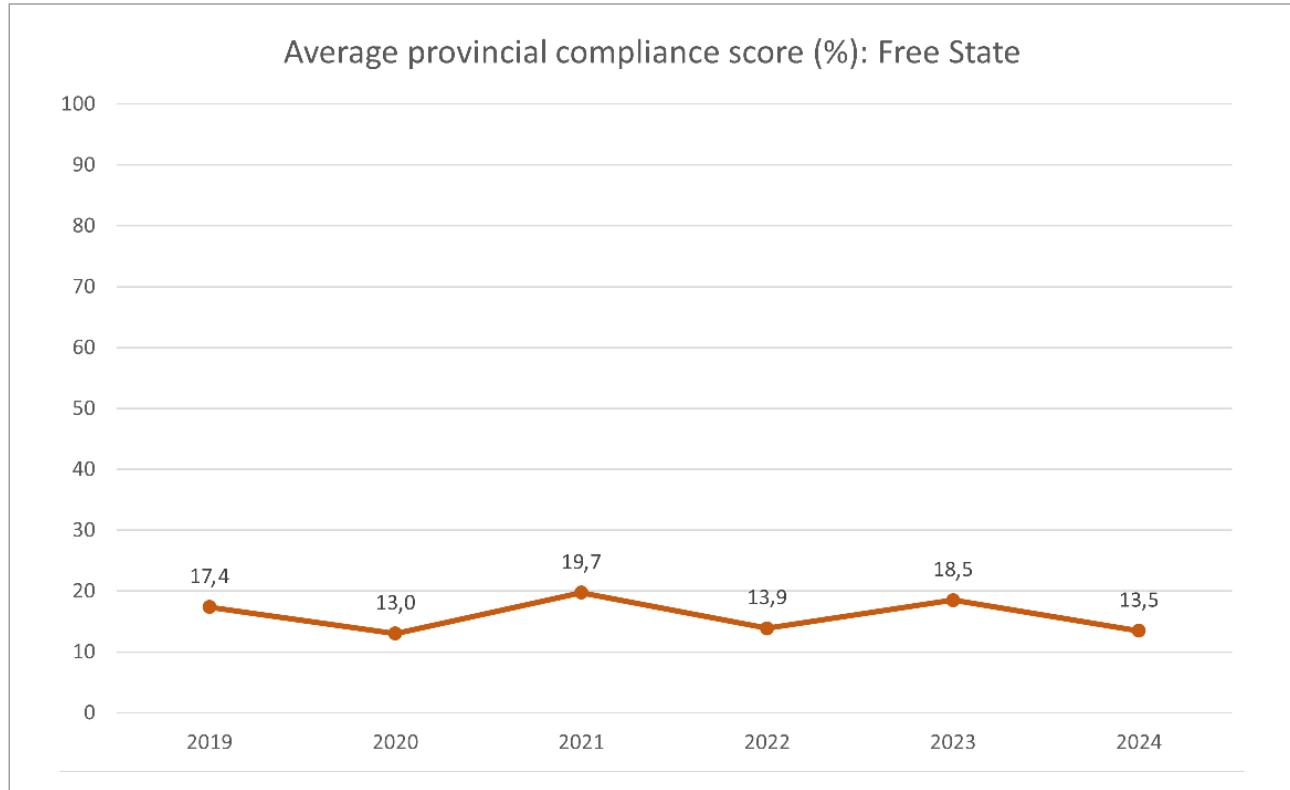


Figure 9: Average provincial compliance score: Free State

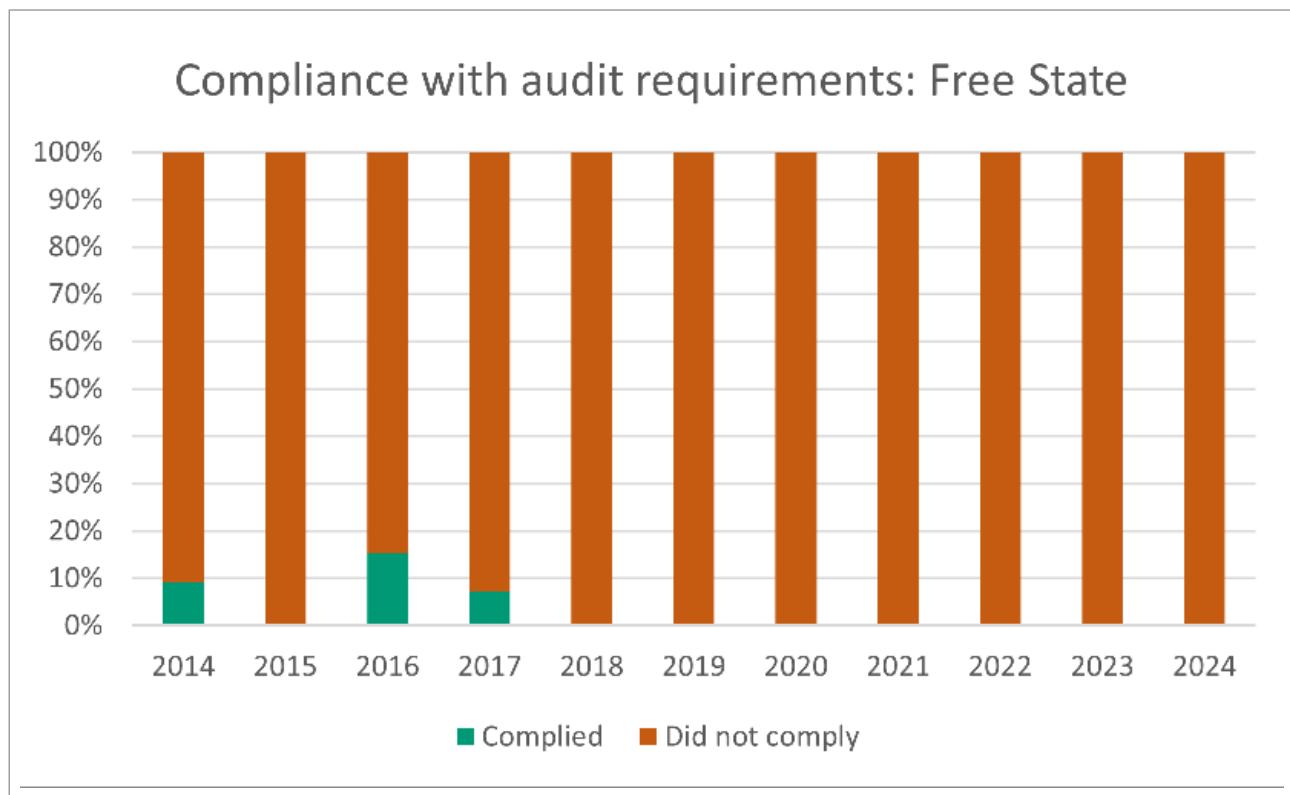


Figure 10: Percentage of compliant versus non-compliant landfill sites: Free State

2024 audit results: Gauteng

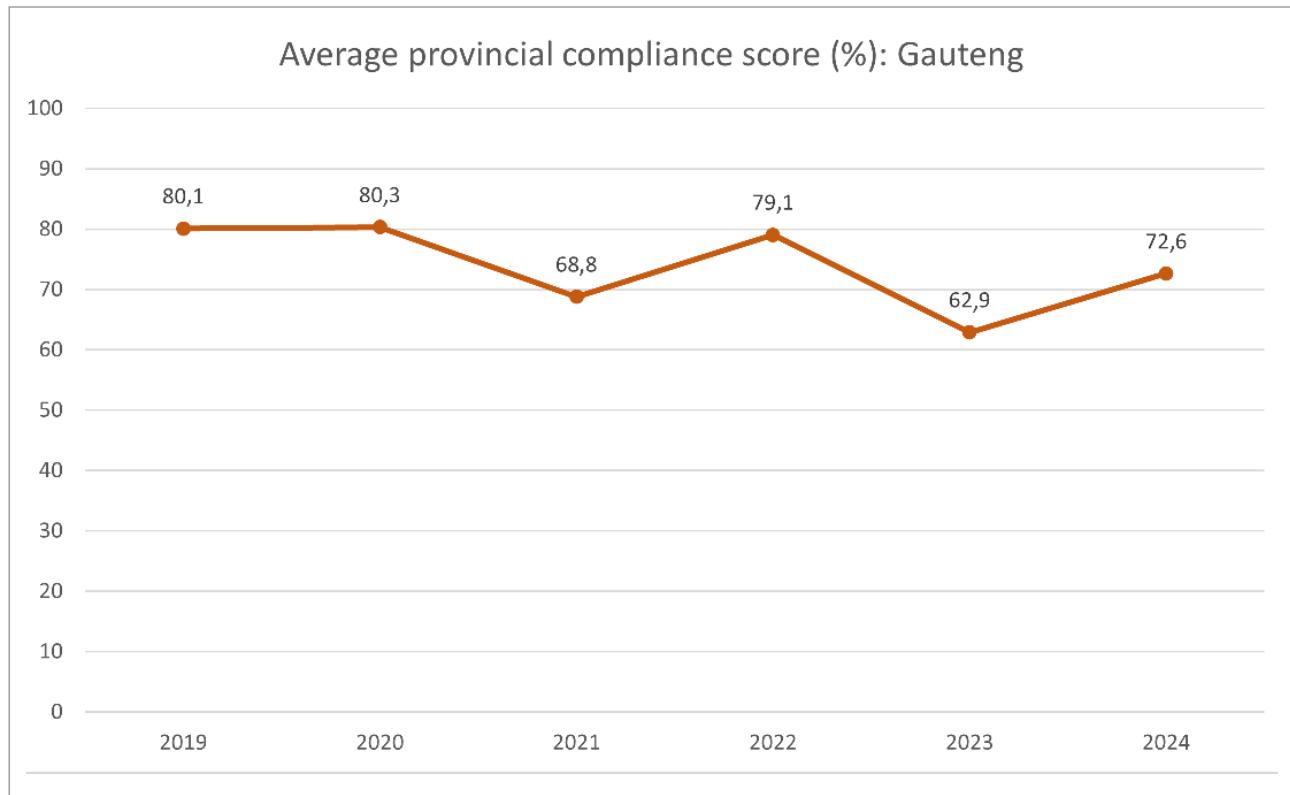


Figure 11: Average provincial compliance score: Gauteng

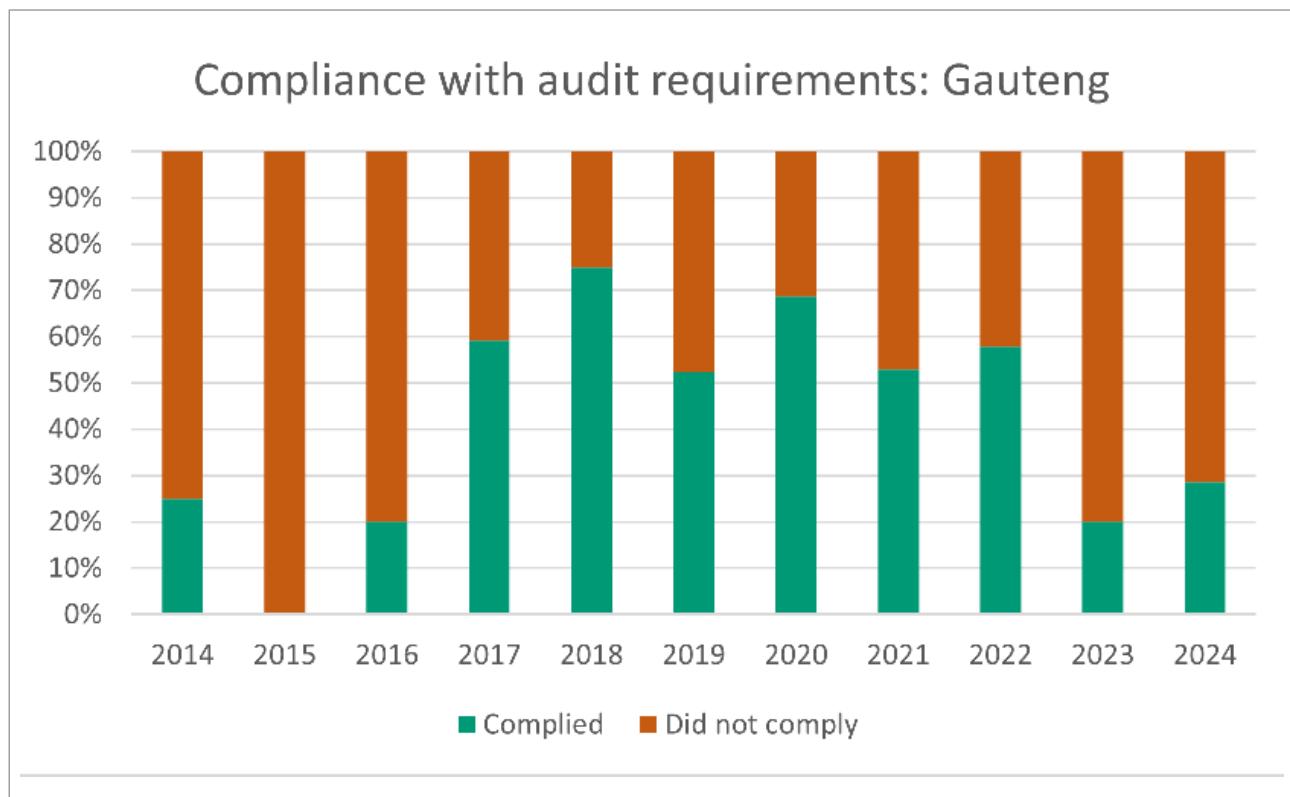


Figure 12: Percentage of compliant versus non-compliant landfill sites: Gauteng

2024 audit results: KwaZulu-Natal

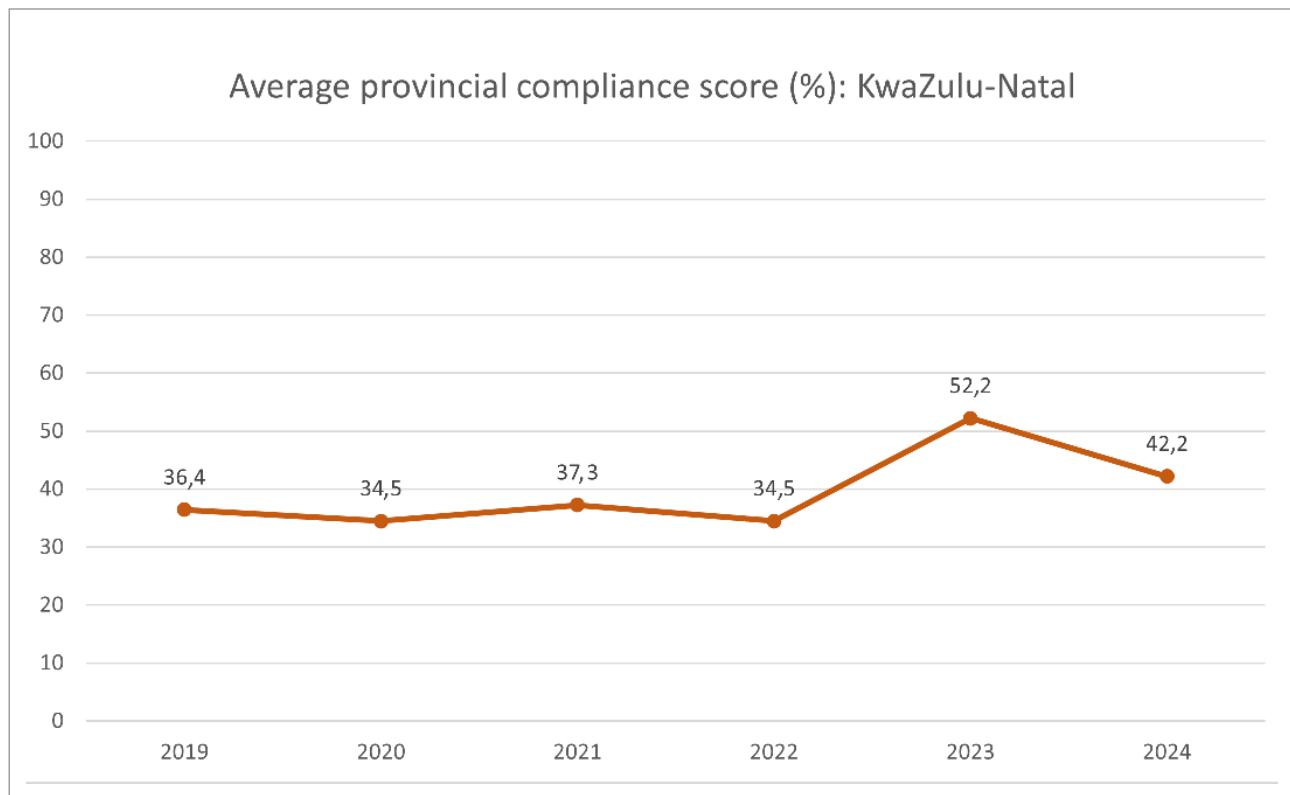


Figure 13: Average provincial compliance score: KwaZulu-Natal

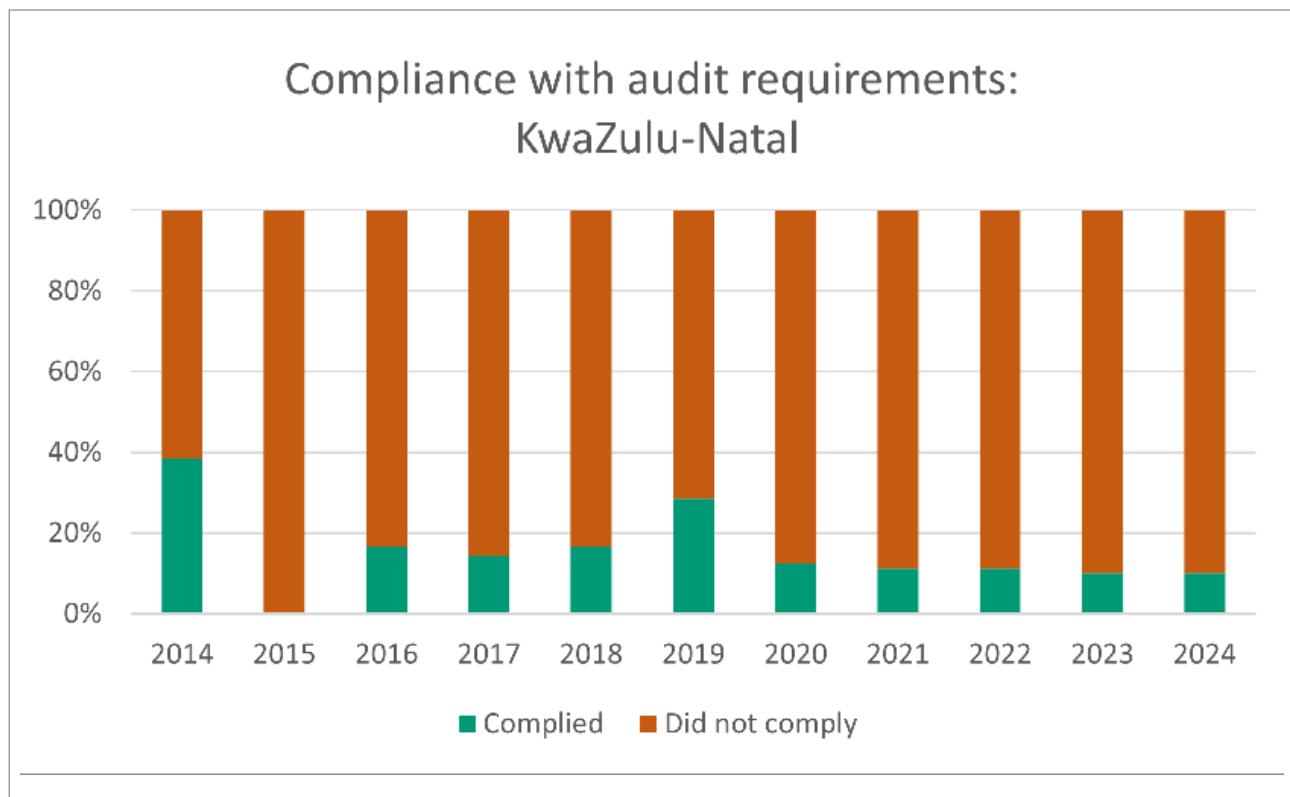


Figure 14: Percentage of compliant versus non-compliant landfill sites: KwaZulu-Natal

2024 audit results: Limpopo

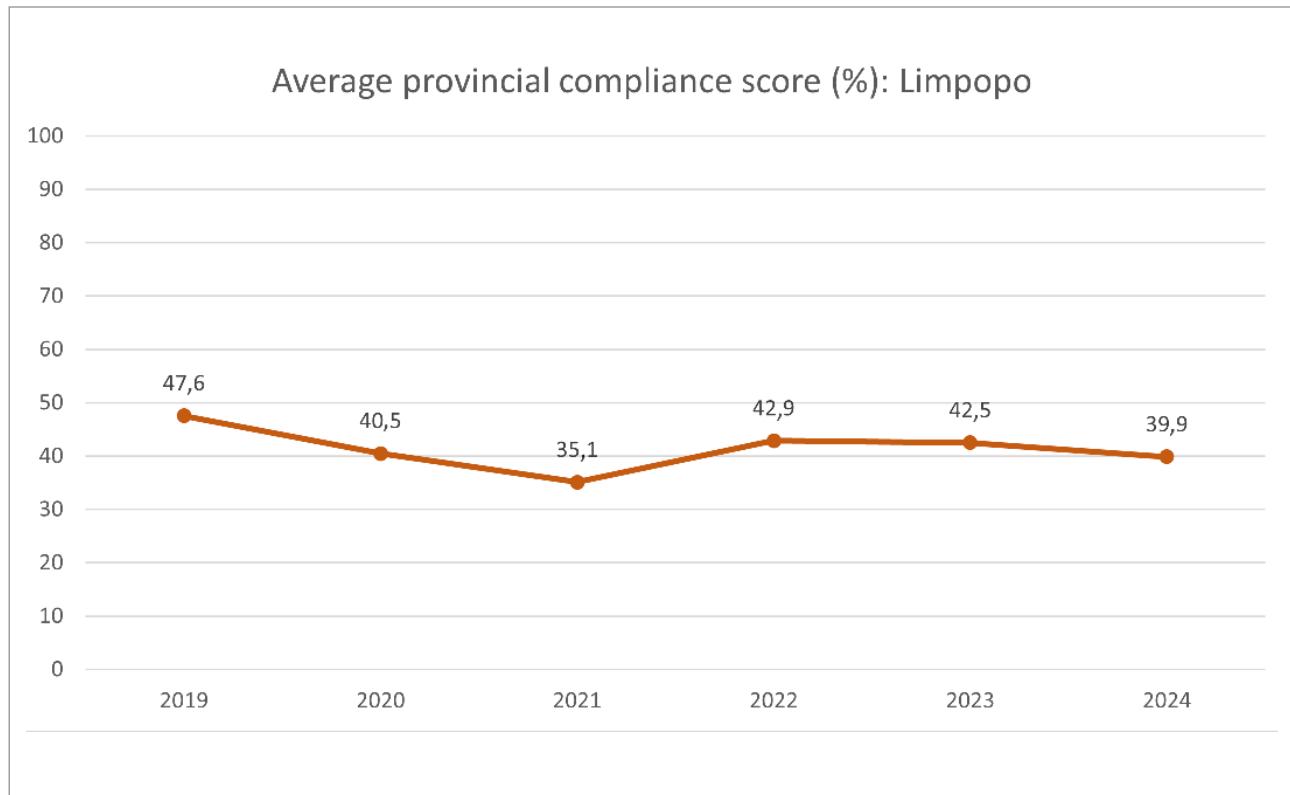


Figure 15: Average provincial compliance score: Limpopo

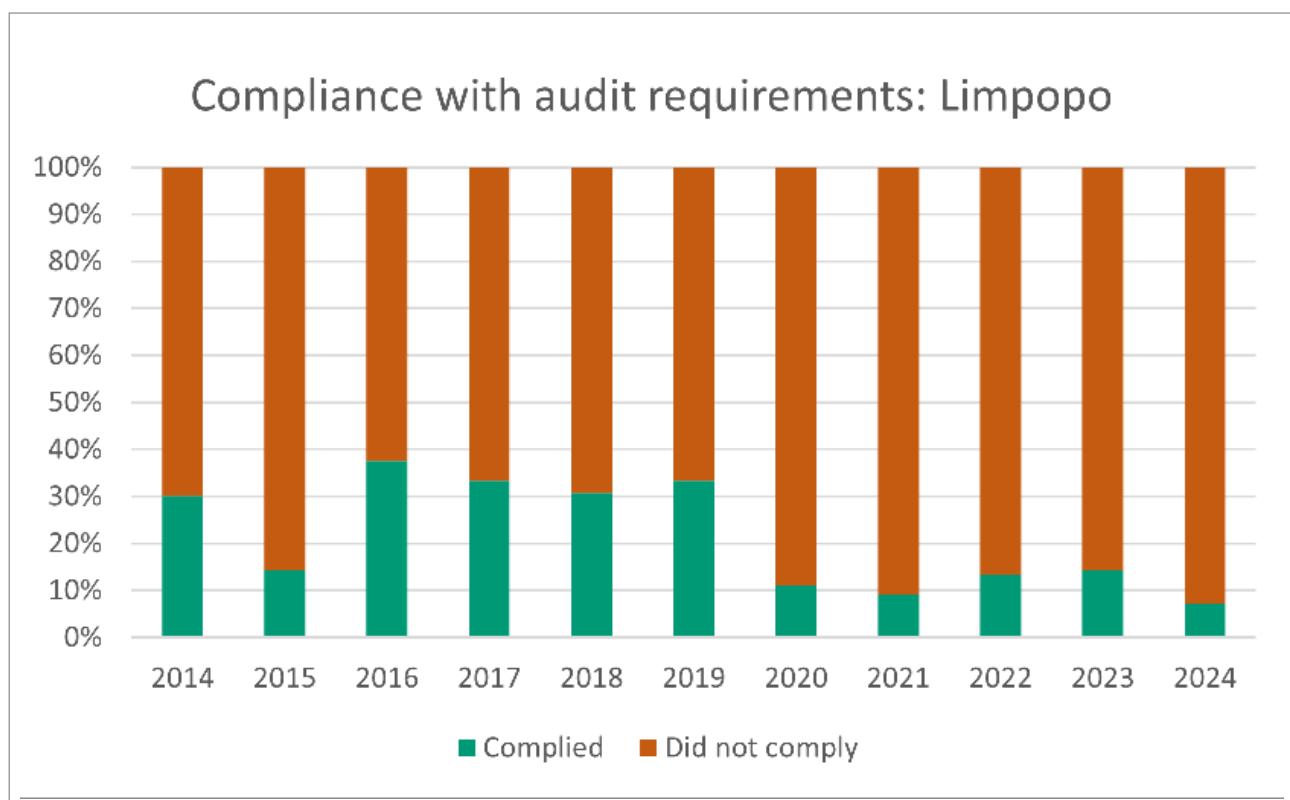


Figure 16: Percentage of compliant versus non-compliant landfill sites: Limpopo

2024 audit results: Mpumalanga

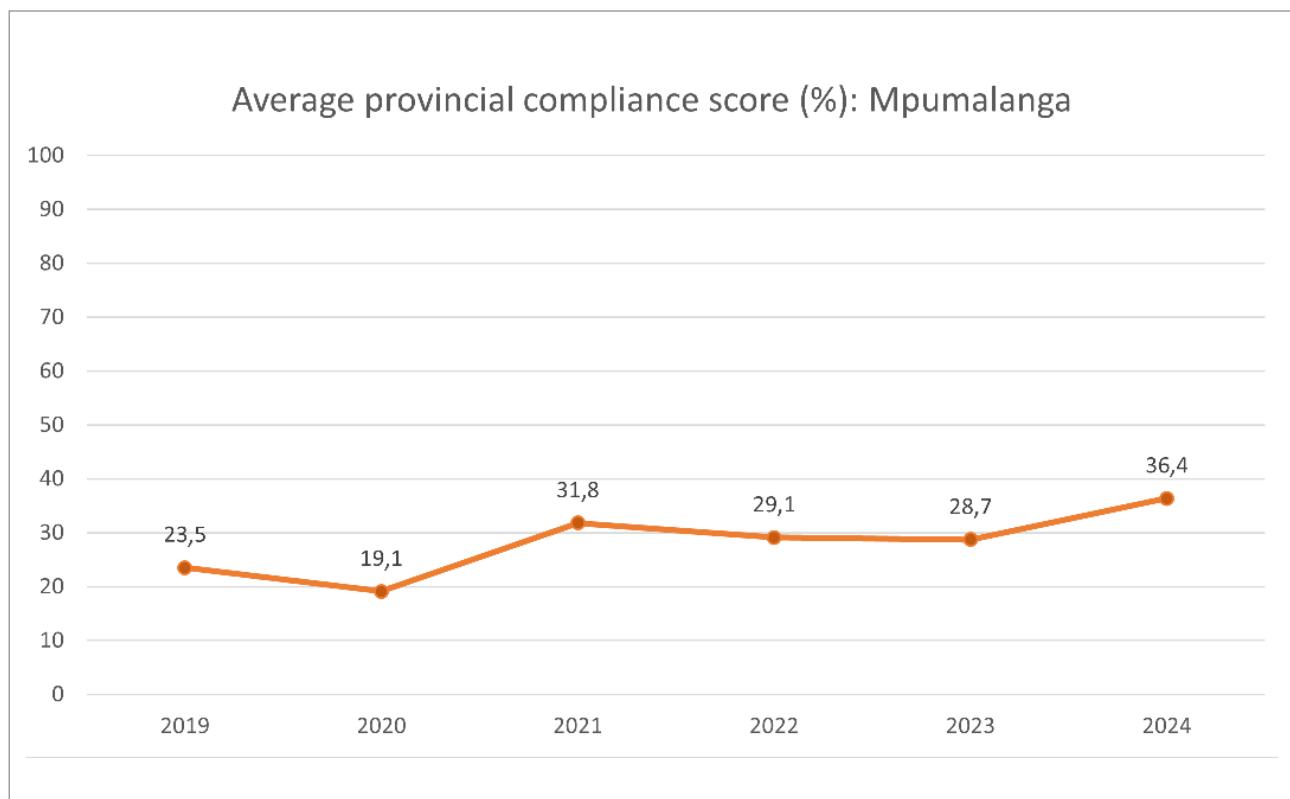


Figure 17: Average provincial compliance score: Mpumalanga

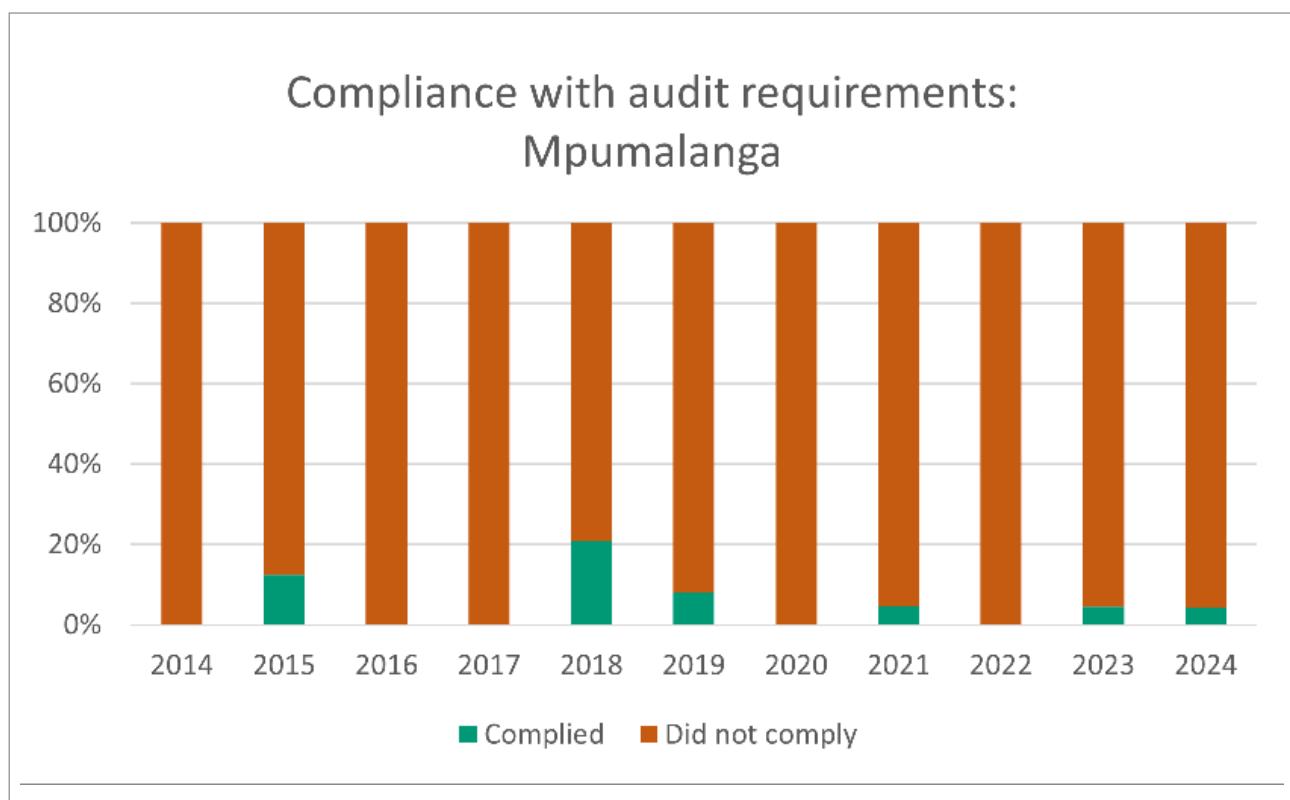


Figure 18: Percentage of compliant versus non-compliant landfill sites: Mpumalanga

2024 audit results: Northern Cape

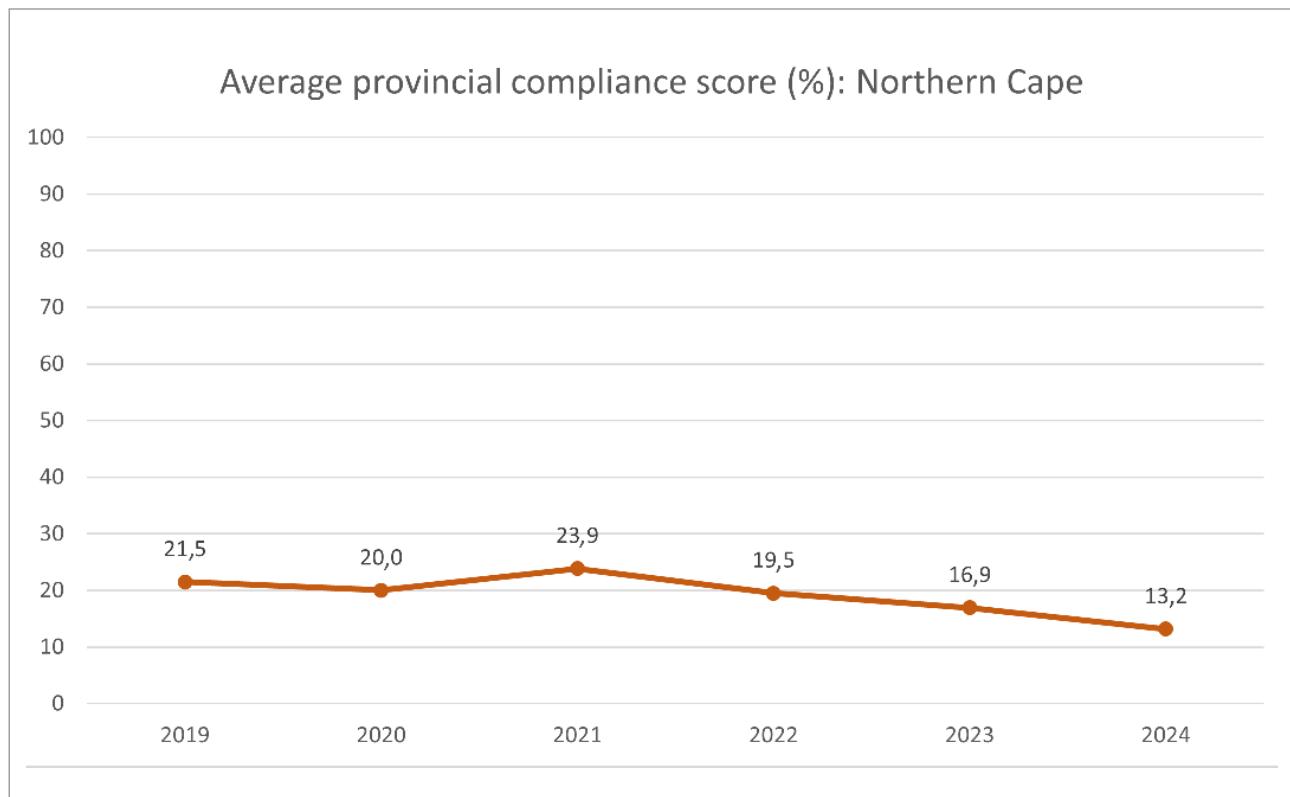


Figure 19: Average provincial compliance score: Northern Cape

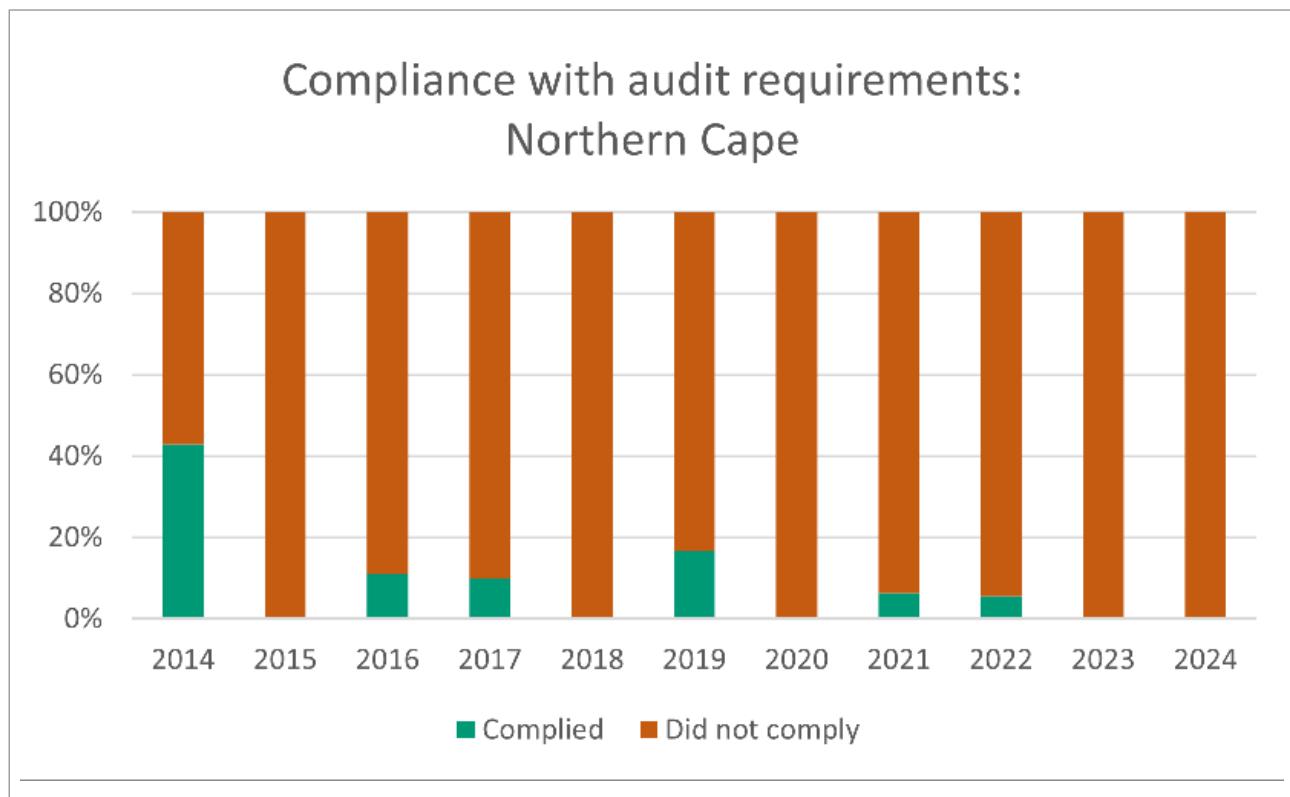


Figure 20: Percentage of compliant versus non-compliant landfill sites: Northern Cape

2024 audit results: North West

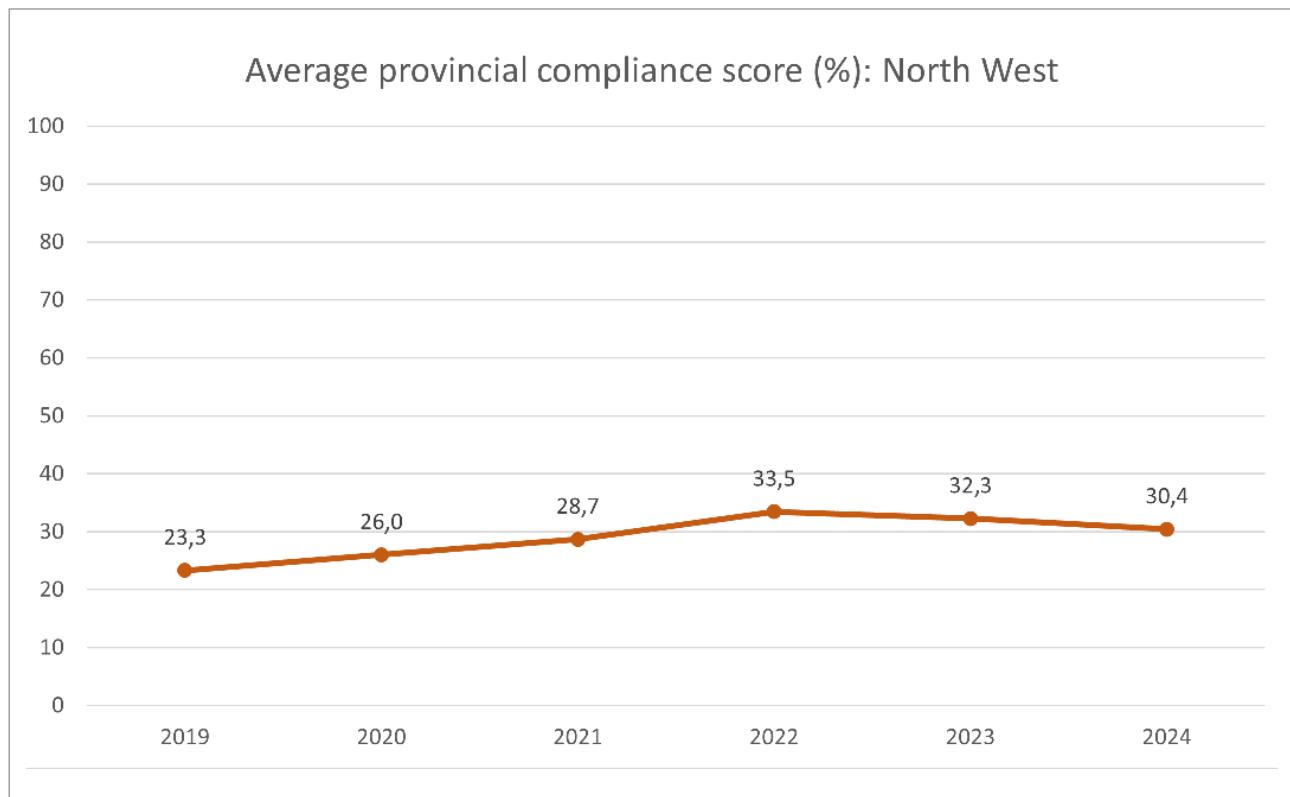


Figure 21: Average provincial compliance score: North West

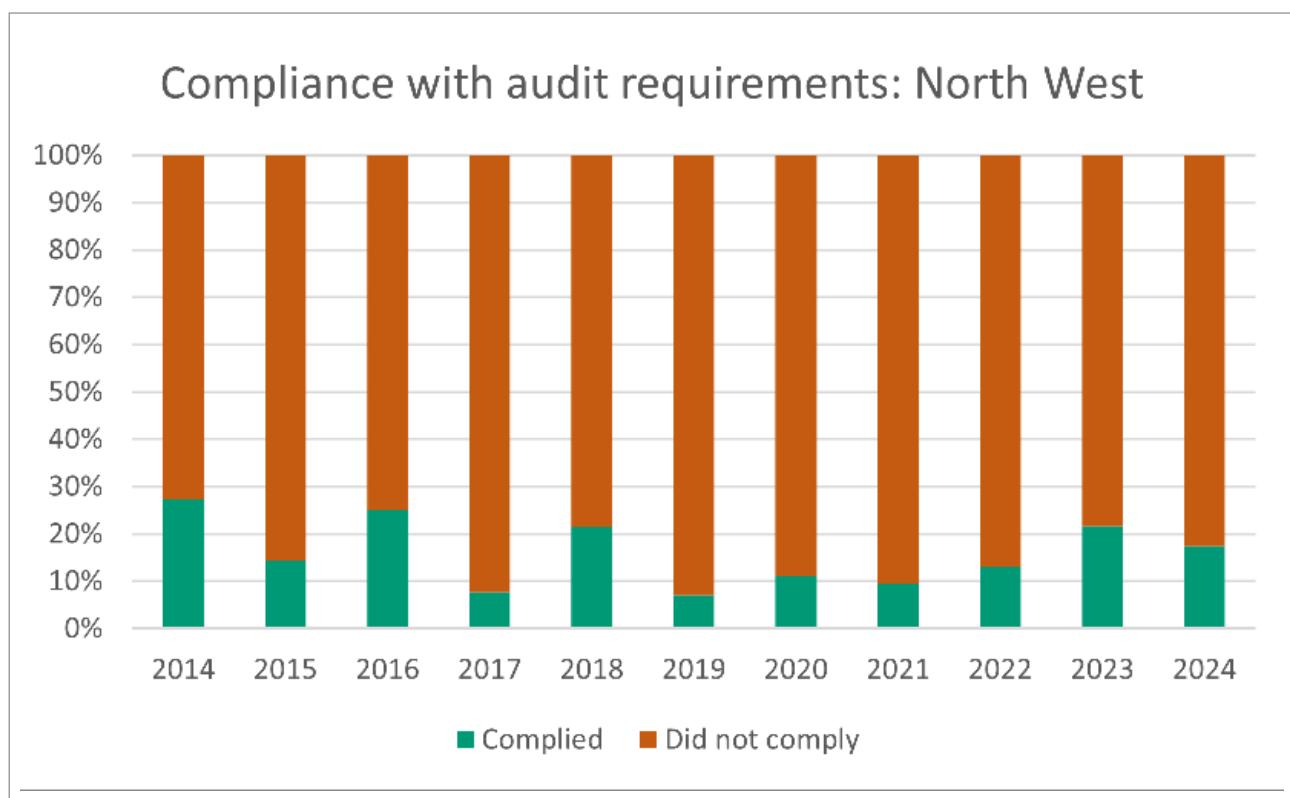


Figure 22: Percentage of compliant versus non-compliant landfill sites: North West

2024 audit results: Western Cape

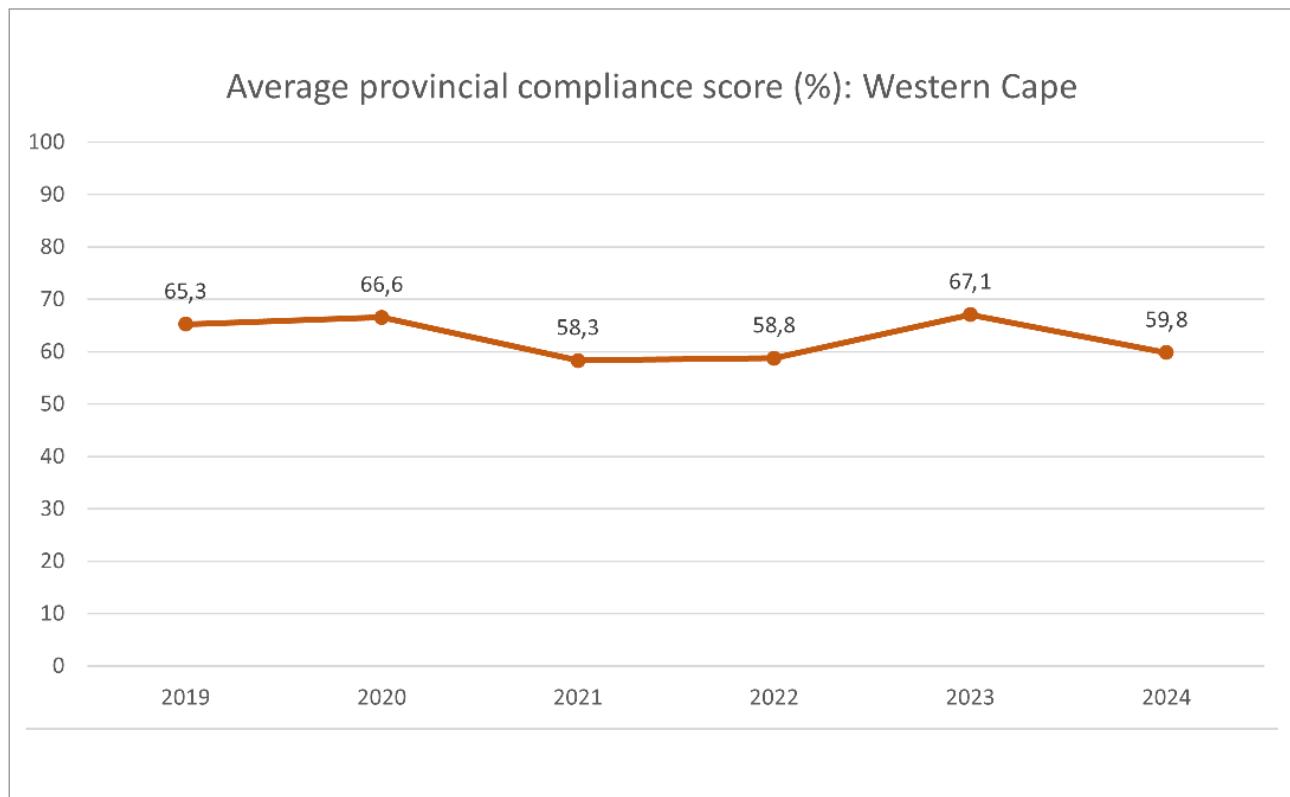


Figure 23: Average provincial compliance score: Western Cape

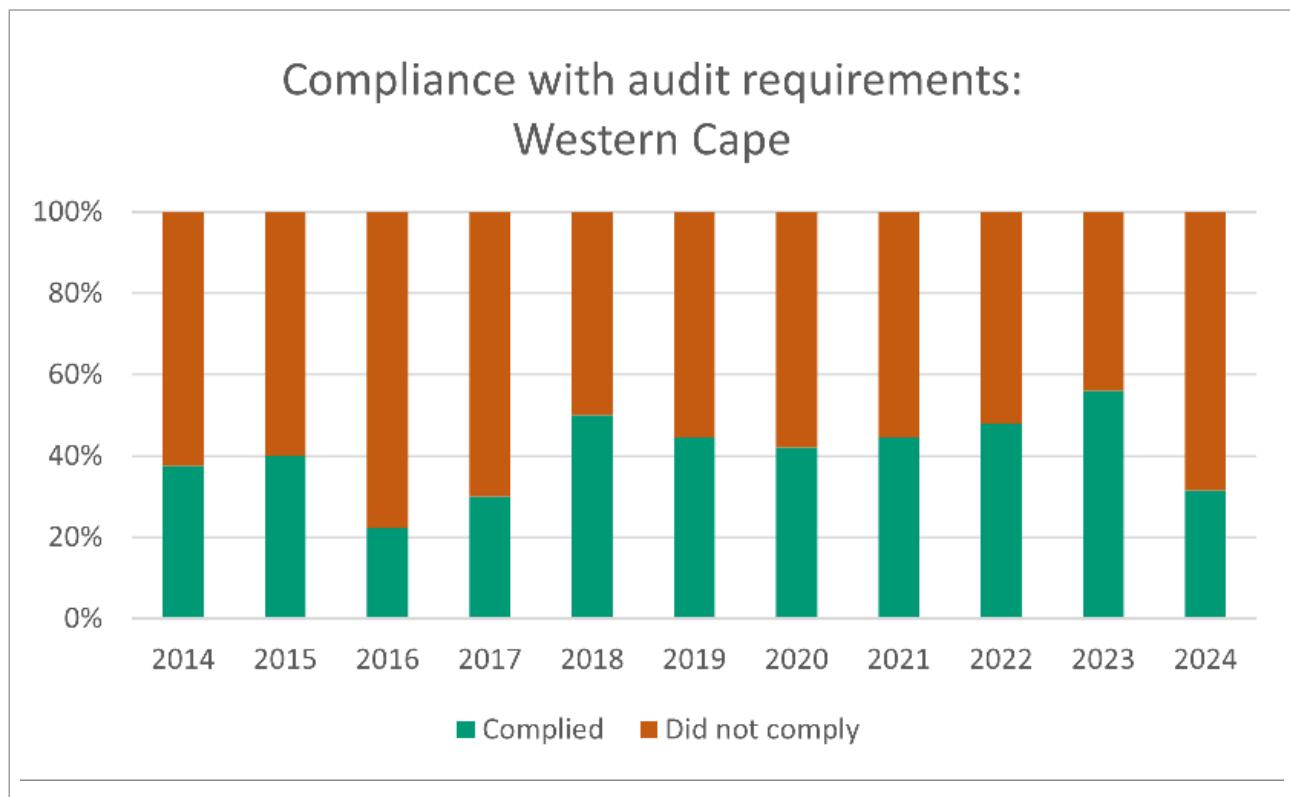


Figure 24: Percentage of compliant versus non-compliant landfill sites: Western Cape



What has been achieved so far?

Challenges at government level

Year after year, the findings of AfriForum's landfill site audits is a huge cause for concern. Several discussions have been held through the years with the DFFE and the municipalities involved, in order to identify challenges and solutions on how to turn landfill sites around, and to discuss improved cooperation. Yet 2024's audit results prove that all this effort has borne little fruit.

The reality is that most municipalities unfortunately do not have the will nor the knowledge to manage landfill sites. A further problem is that there is insufficient communication between national, provincial and local authorities. Because proper planning on local government level has fallen on the wayside, the national government is simply trying to keep a sinking ship afloat at this stage. Although it would appear that the national government has the will to see an improvement at the local level, this is not implemented at the provincial and local level.

AfriForum has learned that national government has plans to open joint district landfill sites that will service three to four towns. Although these sites do not yet exist, and will most probably cause many problems for municipalities, many landfill sites that still have enough remaining air space are already being notified to close.

It also became clear that municipalities are not aware of the changes in the regulation of the municipal

infrastructure grant, which can be utilised to fund the landfill site infrastructure (the so-called yellow fleet). Municipalities also do not know how the application process works. The grant is paid to municipalities by the Department of Cooperative Government. This grant could have helped municipalities to fund the necessary infrastructure via National Treasury instead of putting local taxpayers under more pressure. This once again highlights the poor or non-existent communication between the different government levels and the respective departments.

The reason for this is simple – waste management is controlled by three different spheres of government. The DFFE only has the power to institute laws, policies, norms and standards on national level. They have no power on provincial or municipal level. The provincial government reports to the provincial MEC and not to the minister of the DFFE. Likewise, municipalities report to their mayor as political leader and not to the provincial or national government.

Every government sphere has its own political agenda, and officials must keep the political leaders happy on the level they operate on. This causes friction and discrepancies and partly explains the situation. Additionally, the Constitution requires cooperative governance, and national departments are therefore hesitant to act against provinces and municipalities.

In most cases where municipalities fail in their duties,

the department's solution is to give directives followed by criminal prosecution if not adhered to. The problem with this course of action is that it makes no real difference on ground level, and it is a time-consuming process. Legal action ends up being funded indirectly by taxpayers.

Consultation with industry experts

As a result of the abovementioned challenges, AfriForum's Environmental Affairs team has been meeting with various experts in the waste industry and the private sector since the end of 2019. These include Unisa, the UWC, the CSIR, The Waste Group and other private companies. These role-players support what AfriForum is trying to achieve with this project and is also enthusiastic about bringing about relief for communities that are bearing the brunt of poor waste management, and about solving the country's waste management challenges.

According to experts in waste research involved at the CSIR, Prof. Linda Godfrey and Prof. Suzan Oelofse, it is necessary that a broader system perspective to municipal waste management should be applied in South Africa. This means that the following basic steps need to be implemented correctly throughout the waste cycle:

- improved refuse collection, cleaning of cities and dealing with littering and illegal dumping (an increasing problem in SA);
- the safe management of waste at the end of the cycle; and
- consideration of alternative waste treatment technologies, especially for materials that are

easy to recycle, such as organic waste, building rubble and paper packaging.

In order to improve the management of landfill sites, the following issues need to be considered:

- Improved enforcement of legislation on all public and private landfill sites is necessary to ensure compliance and to promote better decision-making on remedial actions.
- Substantial public-private partnerships need to be facilitated. If implemented correctly, municipalities will be able to act as referees, therefore ensuring the improved operation of landfill sites within the compliance with licence conditions (e.g. through fines), while also including incentive mechanisms in contracts for the diversion of waste from landfill sites.
- Capital expenditure funding needs to be made available on national level for the rehabilitation and closure of landfill sites or the development of new cells, with legislative requirements in mind.
- Municipal waste removal services that do not address the relevant community's needs, contribute to illegal dumping. It is therefore necessary to consult communities in finding solutions and addressing inadequate waste services.

In 2023 AfriForum did a presentation to the IWMSA on the 2022 landfill site audit report. Based on this, certain municipalities – mainly in the Western Cape – and role-players in the private sector entered into further discussions about solutions to South Africa's waste problems.





Action plan and solutions

Following the 2024 landfill site audit, AfriForum once again brought the findings about inadequate waste management to the attention of the municipalities concerned. AfriForum branches have also drawn up action lists of landfill issues, which were handed to municipal managers to deal with. Unfortunately, several municipalities that did not meet the audit requirements did not respond to AfriForum's letters either.

The public participation process for each municipality's integrated development plan (IDP) is one of the opportunities that AfriForum used in 2023 to highlight waste management issues. In this way, AfriForum wants to ensure that the relevant municipalities budget sufficiently in the coming financial year to be able to meet the community's waste disposal requirements.

The landfill site audit report of 2024 will be used as the benchmark against which landfill sites will be measured in 2025. An attempt will also be made to extend the audit to all AfriForum branches in 2025.

Action plan

AfriForum's process to promote compliance includes the following:

1. The landfill site audit is the beginning of a

comprehensive track record or paper trail for every landfill site.

2. Non-compliance will be addressed in a letter demanding a comprehensive plan of action from the responsible authority. The municipality must indicate how and by what dates they will meet the requirements with which they do not comply at present.
3. AfriForum branches should participate in the public participation process for the integrated development plan to ensure that the paper trail is as thorough and complete as possible.
4. Because provincial departments have the responsibility to monitor landfill sites, enforce the law and issue licences for unlicensed landfill sites, AfriForum will continue to put pressure on the provinces to fulfil their duties.
5. Should municipalities fail to resolve the issues, legal action will be taken. A criminal case could be opened against the relevant administrative official.
6. Landfill sites that do not comply with the audit requirements will be rehabilitated by AfriForum and AfriForum will claim the money back from the relevant municipality.

7. This report will also be given to the Green Scorpions (Environmental Management Inspectors or EMIs) for further investigation of landfill sites that do not comply with the audit requirements.
8. A generic criminal charge sheet was compiled to be used to charge the relevant municipalities and municipal managers for their gross negligence. It is important to remember that the minimum requirements only become enforceable once it is specified in licences. The non-compliance with minimum requirements is therefore not a prosecutable offense, unless there is proof of environmental pollution.
9. The 2024 landfill site audit report will be submitted to the minister of the DFFE in order for strategies to be discussed and implemented in an effort to solve the problems.

Solutions

AfriForum believes that communities, municipalities and the relevant departments can work together to solve these important issues and to ensure a safe and healthy environment for everyone in South Africa.

The preferred mechanism for this is a public-private partnership (PPP). A PPP refers to a long-term agreement

between an organ of the state such as a municipality and a private entity, usually a registered company. PPPs aim to divide the financial and operational risks between an organ of the state and the private sector, with shared benefits.

It is a partnership that can be trained on various models. Some PPPs are focused on the short term and in these partnerships the financial risks are usually carried by the state. Long-term partnerships form when the investment input of the private partner is much more than that of the state, to ensure that the private partner will realise a return on their investment. In the case of service delivery partnerships, the operational risk is often shifted to the private partner.

Municipalities find themselves in a rapidly changing technological environment and often cannot access such technologies because of competitive costs. In contrast, the private sector competes on a level playing field and makes use of proven management processes and technologies. A PPP creates an ideal opportunity to efficiently bridge the gap which has developed in this respect.

Without reinventing the wheel, the use of proven technologies, experience and expertise can be shared, which will be cost-efficient to organs of the state. For the general public it will mean delivery of better and cost-efficient services.

An aerial view of the Soshanguve landfill site



An aerial view of a wet weather cell of a landfill site



Summary

AfriForum's 2024 landfill site audit shows that municipal waste management continues to deteriorate. Only 14,3% of municipalities complied with the audit requirements. This is a decline of 3,3% compared to the 17,5% of municipalities that complied with 80% or more of the audit requirements in 2023. The decline in the number of landfill sites that passed the audit in 2024 is concerning, as AfriForum had shared the results of the 2023 audit with the relevant municipalities as well as the minister of the DFFE. It therefore appears that no significant steps have been taken in the past year to address these shortcomings.

The audit shows that municipalities do no – or very little – formal recycling on landfill sites, which increases the risks to people's health and the environment, all this while there is an increasing number of informal recyclers living on landfill sites, and many of the sites are too dangerous for community members to enter.

It is concerning that most municipal officials could not provide any data on landfill sites' remaining air space or the number of informal recyclers operating on site. This shows a lack of political will to implement adequate waste management.

There appears to be a large disconnect between the management of landfill sites at ground level and the plans that are established at a national level. There is also a clear communication gap between the three spheres

of government, resulting in national government losing control over local authorities.

Overall, the 2024 landfill site audit shows that South Africa is experiencing significant problems with the management of landfill sites. The audit also shows that if these problems are not addressed urgently it could lead to a complete collapse of waste management. The waste management crisis that the country is facing already has serious implications for Gauteng, given the very limited quantity of remaining air space on Gauteng's landfill sites, with virtually no prospects or suitable locations for new sites.

There has however been limited successes, which can be attributed to a number of important elements:

1. Wherever an AfriForum branch is involved in an efficient way in the waste management of the local municipality, the watchdog function of the community is automatically activated. This increases the transparency of the municipality's services and thus improves the management of waste processing in general.
2. The community's participation in the democratic process is improved, for instance by insisting on the municipality's obligation to create forums where the community can provide inputs and keep a critical eye on operations. This exerts pressure on municipalities

to comply with and progressively improve on their constitutional obligation, i.e. to manage landfill sites in a sustainable way and to improve year after year.

3. The provincial department's role as monitor, legislator and licence issuer is of utmost importance for the improvement of landfill site management on local government level. Involving the provincial regulators in AfriForum's annual landfill site audit project promotes cooperation between the AfriForum branches and the provincial departments. It also forces the province to comply with their constitutional obligations where this may have been omitted in the past. AfriForum plans to work closely with the national departments to restore some of the landfill sites, and to investigate the potential of PPPs.
4. AfriForum is continuously considering new technology and alternative ways in which the functioning of

landfill sites can be improved, as well as alternatives to landfill sites.

5. Lastly and where AfriForum is most focused on, is to ensure that the national government executes its overall supervisory role over the other two spheres of government effectively, and that a legislative and regulatory framework is created within which South Africa's waste management strategies can be contained and standards be compiled. The challenge is to bring these three government spheres and communities together and have them function in harmony to manage the country's waste sustainably.

AfriForum will therefore persist in monitoring landfill sites and explore alternatives for proper waste management in South Africa.



Addendum A: Audit scores of all landfill sites that were audited

Table 1: Landfill site compliance scores per province for the period 2019–2024

Key:

Landfill site with permit	Yellow
Landfill site without permit	Red
Private landfill site	Green
Waste transfer facility	Grey

EASTERN CAPE									
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)						
			2019	2020	2021	2022	2023	2024	
Aliwal North	Maletswai LM	12/9/11/P131	34	36	56	26			Site was supposed to close down, already over capacity
Cradock	Inxuba Yethemba LM	B33/2/1000/33/P122	-		10	32	52	90	
Elliot	Sakhisizwe LM	-	2	4	0	0	22	2	
Hankey	Kouga LM	BB33/2/110/05/P209	40	72	42	30	20	44	
Humansdorp	Kouga LM	12/9/17/P53	58	88	68	-	74	72	
Port Elizabeth (Arlington)	Nelson Mandela Bay Metro	16/2/7/M200/D1/21/P278	90	78	62	78	98	76	
Port Elizabeth Gillespie Street waste transfer facility	Nelson Mandela Bay Metro	-	-	-	-	-	-	28	
Port Elizabeth Hillwacht waste transfer facility	Nelson Mandela Bay Metro	-	-	-	-	-	-	2	
Uitenhage (Koedoeskloof)	Nelson Mandela Bay Metro	B33/22/1200/7/P37	90	74	36	38	80	48	
East London (Roundhill)	Buffalo City Metro	-	-	-	-	-	64	84	
Number of landfill sites			6	7	6	7	7	10	
Total score			314	352	274	204	410	462	
Average compliance (%)			52,3	58,7	39,1	34,0	58,6	46,2	

FREE STATE							
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Allanridge	Matjhabeng LM	-	-	0	4	0	16
Bethlehem	Dihlabeng LM	12/9/11/L98/2 & WM-L/1B/03/2010	16	6	32	18	28
Bloemfontein North	Mangaung Metro	16/2/7/C522/D1/Z2/P478	10	16	22	12	32
Bloemfontein South	Mangaung Metro	B33/2/350/2/P162	14	20	28	28	30
Boshof	Tokologo LM	WML/BAR/11/2014	18	26	14	20	30
Bothaville	Nala LM	16/2/7/C604/D1/Z1/P340	-	4	4	10	4
Brandfort	Masilonyana LM	-	2	2	34	12	14
Bultfontein	Tswelepele LM	WML/BAR/07/2014	24	28	28	24	28
Dealesville	Tokologo LM	12/9/11/L886/2	26	52	38	24	24
Deneysville	Metsimaholo LM	-	-	-	-	4	2
Frankfort	Mafube LM	16/2/7/E304/C11/Z1/P342	3	4	0	0	0
Harrismith	Maluti-A-Phofung LM	16/2/7/C801/D2/Z1/P333 & 16/2/7/C801/D2/Z2/P343	13	18	24	24	22
Heilbron	Ngwathe LM	-	-	0	2	0	2
Hennenman	Matjhabeng LM	-	26	0	0	0	8
Hertzogville	Tokologo LM	-	-	-	-	-	14
Kroonstad	Moqhaka LM	B33/2/360/1/P36	16	8	14	16	20
Odendaalsrus	Matjhabeng LM	B33/2/325/6/P108	7	2	52	20	50
Parys	Ngwathe LM	16/2/7/C233//D1/Z1/P336	16	8	10	20	6
Reitz	Nketoana LM	16/2/7/C805/D4/721/P341	13	12	14	14	8
Sasolburg	Metsimaholo LM	12/9/11/L19052215440712	18	20	14	20	12
Senekal	Setsetsoto LM	B33/2/340/16/P221	-	22	18	14	22
Steynsrus	Moqhaka LM	B33/2/340/88/P112	-	4	10	8	22
Theunissen	Masilonyana LM	16/2/7/C402/D3/Z1/P339	24	8	12	4	14
Vaalpark waste transfer facility	Metsimaholo	-	-	-	-	78	72
Viljoenskroon	Moqhaka LM	-	-	-	-	4	8

FREE STATE

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Welkom	Mathhabeng LM	B33/2/340/32/P85	13	12	48	36	14
Winburg	Masilonyana LM	B33/2/340/20/P48	54	28	32	6	8
Zastron	Mohokare LM	-	-	-	-	4	30
						0	0

Number of landfill sites	18	2019	23	2020	24	2021	27	2022	27	2023	27	2024
Total score	313	2019	300	2020	334	2021	500	2022	364	2023	364	2024
Average compliance (%)	17,4	2019	13,0	2020	19,7	2021	13,9	2022	18,5	2023	13,5	2024

GAUTENG

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Alberton (Platkop)	Ekurhuleni LM	33/2/321/1450	97	95	96	100	Closed down
Boksburg (Rooikraal)	Ekurhuleni LM	16/2/7/c221/D24/21/P512	97	97	Closed (under construction)	Denied entry	Closed
Bon Accord	The Waste Group	B33/2/123/154/P191	94	98	86	92	86
Brakpan (Weltevreden)	Ekurhuleni LM	B33/2/321/172/P137	94	91	94	94	Site too dangerous
Bronkhorstspruit	Tshwane Metro	B33/2/222/116	84	84	64	82	70
Carletonville	Metrafong City LM	16/2/7/C231/D004/Z/P415	-	68	94	80	78
Fochville waste transfer facility	Metrafong City LM	-	-	-	-	-	0
Ga-Rankuwa	Tshwane Metro	16/2/7/A230/D9/Z3/P489	92	74	72	72	59
Germiston (Simmer & Jack)	Ekurhuleni LM	B33/2/0322/494/P223	78	84	94	94	Denied entry
Hatherley	Tshwane Metro	B33/2/123/88/P215	88	88	84	70	41
Luijpaardsvlei	Mogale City LM	-	-	-	-	-	72
Kempton Park (Chloorkop)	Ekurhuleni LM	-	-	Closed	Rehabilitation	Closed down	Closed
Meyerton	Midvaal LM	002/12-13/W0001	100	96	98	92	-
Mooiplaats	The Waste Group	16/2/7/A230/154/21/p311	96	96	98	94	98
Onderstepoort	Tshwane Metro	B33/2/123/7/P6	76	Closed	Closed	Rehabilitated	Rehabilitated

GAUTENG

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Randfontein	Rand West City	B33/2/323/34/P12 12/9/11/L68331/3	46	Closed	4	4	16
Roodepoort	Johannesburg Metro	16/2/7/C221/D11/Z3/P65 B33/2/121/53/P65	34	Closed	Closed	86	84
Soshanguve	Tshwane Metro	B33/2/123/101/P43 16/2/7/C221/D494/P275	78	86	94	94	74
Springs (Rietfontein)	Ekurhuleni LM	006/15-16/W0005- 006/15-16/W0004	88	94	Closed (under construction)	94	Denied entry
Vanderbijlpark (Boitshepi)	Emfuleni LM	32	26	12	34	18	Closed
Waldrift	Emfuleni LM	68	60	24	34	Closed down	Closed
Westonaria (Libanon)	Rand West City	16/2/7/C23/D21/Z	100	48	18	30	Closed down

Number of landfill sites	18	16	15	15	11	16
Total score	1442	1285	1032	1186	692	1162
Average compliance (%)	80,1	80,3	68,8	79,1	62,9	72,6

KWAZULU-NATAL

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Dundee (Glencoe)	Endumeni LM	12/9/11/L51/4	-	-	-	-	74
Hluhluwe	The Big Five False Bay LM	-	2	0	12	0	28
Margate	Ray Nkonyeni LM	16/2/7/T402/DS/Z1/P26/A1	96	96	72	58	60
Newcastle	Newcastle LM	B33/2/2010/8/P138	88	60	84	52	30, site capacity has been reached but it is still operational
Paulpietersburg	uDumbi LM	-	14	4	10	8	26
Pongola	uPhongolo LM	DC26/WML/0001/2014	52	38	28	42	70
Richards Bay (Empangeni)	uMhlathuze LM	B33/2/2112/006/P245	-	60	60	100	100

KWAZULU-NATAL

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)					
			2019	2020	2021	2022	2023	2024
Seedoone	eThekwin Metro	-	-	-	-	-	76	60
Utrecht	eMadlangeni LM	Site closed down, but still operational	0	12	30	16	36	34
Vryheid	AbaQulusi LM	-	3	6	2	0	0	32

Number of landfill sites	7	8	8	8	8	9	10
Total score	255	276	298	276	470	422	
Average compliance (%)	36,4	34,5	37,3	34,5	52,2	42,2	

LIMPOPO

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)					
			2019	2020	2021	2022	2023	2024
Ellisras	Lephala LM	-	16	22	16	18	82	42
Groblersdal	Elias Motsoaledi LM	12/4//10-B/10M2	98	-	66	66	73	74
Hoedspruit (Maruleng)	Maruleng LM	12/9/11/L207/5	20	-	12	14	28	28
Marble Hall	Ephraim Mogale LM	16/2/7/B300/D58/Z1/P261	84	78	72	80	61	66
Musina	Musina LM	12/4/10/8/B/8N4	-	-	-	66	20	78
Naboomspruit	Mookgophong LM	16/2/7/A600/D7/Z2/P399	34	30	12	28	24	8
Nylstroom	Modimolle LM	16/2/7/A600/D2/Z1/P380	0	4	4	6	22	4
Phalaborwa	Ba-Phalaborwa LM	16/2/7/B700/016/21/P276	36	54	64	72	60	18
Polokwane	Polokwane LM	16/2/7/A700/D3/Z2/P319	-	-	-	74	50	56
Potgietersrus	Mogalakwena LM	16/2/7/A600/C27/Z3/A1	-	-	-	50	0	40
Roedtan	Mookgophong LM	16/2/7/A600/D23/Z1/P262	-	-	0	4	0	0
Thabazimbi	Thabazimbi LM	16/2/7/A240/D4/Z1/P345	-	0	4	4	17	14
Tzaneen	Greater Tzaneen LM	16/2/7/B800/D2/Z23/1/P501	100	98	100	88	90	88
Warmbad	Bela-Bela LM	B33/2/123/3	40	38	36	30	68	42

Number of landfill sites	9	8	11	14	14	14
Total score	428	324	386	600	595	558
Average compliance (%)	47,6	40,5	35,1	42,9	42,5	39,9

MPUMALANGA

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Barberton	Mbombela LM	B33/2/10960/P131	-	46	70	48	50
Belfast	Emakhazeni LM	12/9/11/P95	41	48	28	28	59
Bethal	Govan Mbeki LM	17/4/WL/MP/307/13/02	10	5	4	8	6
Carolina	Albert Luthuli LM	17/4/WL/MP301/12/02	4	0	Site closed	-	82
Delmas	Victor Khanye LM	B33/2/220/9/P218	12	30	38	22	15
Dullstroom	Emakhazeni LM	17/4/WL/MP314/14/01	4	0	16	12	0
Ermelo	Msukaligwa LM	16/2/7/C112/D1/Z1/P427	2	18	10	8	19
Evander	Govan Mbeki LM	17/4/WL/MP307/14/01	0	6	4	Site too dangerous	Closed
Hendrina waste transfer facility	Steve Tshwete LM	-	-	-	-	-	78
Kinross	Govan Mbeki LM	17/4/WL/MP/307/15/01	6	4	16	4	0
Leandra	Govan Mbeki LM	-	6	6	32	14	0
Lydenburg	Thaba Chweu LM	12/9/11/L826/6	33	10	12	8	20
Machaadodorp	Emakhazeni LM	17/4/WL/MP314/14/02	10	6	8	6	4
Morgenzon	Lekwa LM	-	0	0	0	2	0
Middelburg	Steve Tshwete LM	16/2/7/B10/D33/Z1/P412	28	58	64	74	60
Middelburg (Denniesig waste transfer facility)	Steve Tshwete LM	-	86	-	-	68	42
Nelspruit	Mbombela LM	12/9/11/P5	74	-	90	72	64
Piet Retief	Mkhondo LM	16/2/7/X205/D06/P130	12	48	38	48	22
Secunda	Govan Mbeki LM	17/4/WL/MP/307/13/01	24	10	26	4	8
Standerston	Lekwa LM	12/9/11/L109/6	0	18	18	12	14
Volkstrust	Dr. Pixley Ka Seme LM	-	2	16	58	-	72
Witbank	Emalahleni LM	B33/2/210/32/P136	60	34	44	24	42
Witvlei waste transfer facility	Mbombela LM	16/N/27/x205/D06	80	-	60	76	24
Number of landfill sites		21	19	20	18	21	22
Total score		494	363	636	524	603	800
Average compliance (%)		23,5	19,1	31,8	29,1	28,7	36,4

NORTHERN CAPE

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Bristown	Emthanjeni LM	-	-	-	-	-	-
De Aar	Pixley Ka Seme District	-	-	-	-	-	-
Delportshoop	Dikgatlong LM	-	-	-	-	-	-
Douglas	Siyancuma LM	-	-	4	10	8	0
Hanover	Pixley Ka Seme District	-	-	-	-	-	0
Hartswater	Phokwane LM	-	14	2	42	20	6
Hopetown	Thembelihle LM	-	2	0	10	10	2
Jan Kempdorp	Phokwane LM	-	10	0	10	8	6
Kakamas	Kai !Garib LM	B33/2/450/24/S/P160	-	-	-	10	4
Kamieskroon	Kamiesberg LM	16/27/F300/D8/Z1/P347	-	8	8	26	4
Kathu	Gamagara LM	B33/2/4441/15/P116	28	26	12	18	48
Kimberley	Sol Plaatje LM	16/27/C901/D2/P265	82	52	70	32	36
Kuruman	Ga-Segonyana LM	B33/2/441/9/P128	10	52	34	38	42
Keimoes	Kai !Garib LM	-	2	6	2	2	0
Orania	Orania Dorpsraad	NC/PIX/SIV/ORA/04/2016	80	66	82	90	76
Postmasburg	Tsantsahane LM	-	20	-	Closed	Closed	-
Prieska	Siyathemba LM	16/27/D720/D1/Z1/P479	-	16	46	20	30
Springbok	Nlama Khoi LM	16/27/F300/D9/21/P315	0	4	4	4	4
Strydenburg	Thembelihle LM	-	-	-	14	-	0
Upington	Khara Hais LM	-	6	18	10	26	24
Warrenton	Magareng LM	12/9/11/P103	-	14	18	6	6
Williston	Karoo Hoogland LM	-	4	22	0	0	8

Number of landfill sites	12	15	15	17	17	22
Total score	258	300	358	332	288	290
Average compliance (%)	21,5	20,0	23,9	19,5	16,9	13,2

NORTH WEST

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2019	2020	2021	2022	2023
Bloemhof	Lekwa-Teemane LM	NWP/WM/DR4/2011/11	6	44	32	26	6
Brits (Hartbeesfontein)	Madibeng LM	B33/2/0121/41/P81	-	26	16	58	84
Christiana	Lekwa-Teemane LM	NWP/WM/DR4/2011/09	4	18	22	16	4
Coligny	Ditsobotla LM	-	0	0	0	0	0
Delareyville	Tswaing LM	B33/2/330/44/P219	10	28	28	30	26
Hartbeesfontein	City of Matlosana LM	16/2/7/C241/D3/P456	-	-	-	22	10
Klerksdorp	City of Matlosana LM	16/2/7/C241/D422/P514	10	36	36	68	64
Koster	Kgettengrivor LM	NWP/WM/BP5/2013/23	4	2	16, to be closed and rehabilitated	12, to be closed and rehabilitated	4
Lichtenburg	Ditsobotla LM	B33/2/330/3/P58	16	2	4	6	6
Mooi nooi	Sibanye-Stillwater (Interwaste)	16/2/7/A210/C29/Z1/P379	94	94	80	88	90
Orkney waste transfer facility	City of Matlosana LM	12/9/1/P59	-	-	-	14	4
Ottosdal	Tswaing LM	NWP/WM/NM4/2012/11	-	-	-	40	36
Potchefstroom	Tlokwe LM	16/2/7/C231/D13/Z1/P	64	16	46	82	98
Potchefstroom waste transfer facility (garden refuse)	Tlokwe LM	-	-	-	10	28	84
Rustenburg (Waterval)	Rustenburg LM	NWP/WM/BP1/2011/02	62	94	86	82	92
Sannieshof	Tswaing LM	NWP/WM/NM4/2012/09	2	34	28	36	18
Schweizer-Reneke	Mamusla LM	NWP/WM/DR6/2012/22 (Variation of WML NWP/W/DR6/2012/22)	8	22	16	22	20
Stella	Naledi LM	NWP/WM/DR1/2013/16	-	-	24	34	26
Swartruggens	Kgettengrivor LM	-	-	0	0	4	2
Ventersdorp	JB Marks LM	-	-	0	6	0	12
Vryburg	Naledi LM	NWP/WM/DR1/2009/01	32	28	58	52	50

NORTH WEST			
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)
		2019	2020
Wolmaransstad	Maquassi Hills LM	B33/2/330/19/P166	34
Zeerust	Ramotshere Moloa LM	B33/2/130/7/P214	4
		16	38
		30	32
		34	34

Number of landfill sites	2019	2020	2021	2022	2023	2024
Total score	350	468	574	736	742	700
Average compliance (%)	23,3	26,0	28,7	33,5	32,3	30,4

WESTERN CAPE			
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)
		2019	2020
Albertinia	Hessequa LM	19/2/5/4/D5/1/WL0081/18 (Variation of WMLs 19/2/5/1/ D5/1/WL0057/14)	-
Bellville	Cape Town Metro	19/2/5/4/A5/6/WL0050/12 (B33/2/720/213/P201)	-
Bitterfontein	Matzikama LM	19/2/5/4/F3/2/WL0005/18 (Variation of WML 19/2/5/1/ F3/2/WL0025/14)	-
Bredasdorp	Kaap Agulhas LM	16/2/7/G501/D1/Z1/P329	-
Clanwilliam	Cederberg LM	19/2/5/4/F2/4/WL0007/18 (Variation of WMLs 19/2/5/1/ F2/4/WL0050/14)	-
De Doorns	Breede Valley LM	19/2/5/4/B2/3/WL0041/18 (Variation of WML 19/2/5/1/ B2/3/WL0026/14)	-
Gansbaai	Overstrand LM	16/2/7/G400/D24/21/P335	-
George	George LM	WL0683/4	52
Gordon's Bay waste transfer facility	Cape Town Metro	E13/2/10/1-A3/193-DWLT404/10	96

WESTERN CAPE						
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)			
			2019	2020	2021	2022
Gouritsmond	Hessequa LM	-	-	-	-	-
Heideberg	Hessequa LM	-	-	-	-	-
Hermanus	Overstrand LM	16/277/G501/D3/Z3/P374	-	86	88	94
Jongensfontein	Hessequa LM	-	-	-	-	-
Knysna Sedgfield waste transfer facility (green waste and building rubble)	Knysna LM	-	-	-	-	-
Knysna Old Place waste transfer facility (garden refuse)	Knysna LM	19/2/5/4/F3/6/WL0042/19	-	-	-	-
Klawer	Matzikama LM	19/2/5/1/F4/7/WL0043/15	-	24	26	20
Langebaan waste transfer facility	Saldana LM	19/2/5/4/F3/10/WL0006/18	-	22	12	92
Lutzville	Matzikama LM	19/2/5/4/D6/17/WL0065/18	-	-	-	-
Mossel Bay (Great Brak)	Mossel Bay LM	(Variation of WML 19/2/5/1/D6/17/WL0084/14)	68	96	86	92
Mossel Bay (Sonskynvallei waste transfer facility)	Mossel Bay LM	EG13/2/10/1 - D6/17 - DWLT 002/09	-	-	88	92
Malmesbury (Highlands)	Swartland LM	19/2/5/4/F5/16/WL0030/18 (Variation of WMLs B33/2/720/132/P67)	96	94	98	92
Malmesbury (Chatsworth)	Swartland LM	B33/2/900/35/P167	-	80	4	Closed
Malmesbury (Kuibaskraal waste transfer facility)	Swartland LM	-	-	-	80	88
Nuwerus	Matzikama LM	19/2/5/4/F3/13/WL0033/18 (Variation of WMLs 19/2/5/1/F3/13/WL0118/12)	-	-	20	24
Oudtshoorn (Grootkop)	Oudtshoorn LM	B33/2/900/35/P167	38	48	26	54
Paarl waste transfer facility	Drakenstein LM	-	-	-	-	-
Riversdale	Hessequa LM	19/2/5/4/E3/10/WL0088/18 (Variation of WMLs B33/2/800/106/S/P212)	-	-	86	86
Slangrivier	Hessequa LM	-	-	-	-	-

WESTERN CAPE

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)			
			2019	2020	2021	2022
Stellenbosch	Stellenbosch LM	16/27/G203/D16/21/P331	66	96	94	96
Stilbaai	Hessequa LM	19/2/5/1/D/11/WL0060/14	-	72	88	Closed
Swellendam	Swellendam LM	(Variation of WMILs B33/2/800/9/S/P171)	-	-	-	Denied entry
Velddrif	Bergrivier LM	19/2/5/1/F/1/14/WL0076/18	26	48	44	44
Vredendal	Matzikama LM	19/2/5/4/F3/17/WL0032/18	-	74	32	46
Vredenburg	Saldanha LM	19/2/5/4/F4/23/WL0034/18 (Variation of WMILs 19/2/5/1/F4/23/WL0050/16)	-	-	-	22
Vanrhynsdorp	Matzikama LM	19/2/5/4/F3/16/WL0044/18	-	54	38	30
Wellington	Drakenstein LM	19/2/5/4/B3/39/WL0109/17 (Variation of WMILs E13/2/10/1-B3/36-WL0045/10)	80	68	66	62
Witsand	Hessequa LM	19/2/5/4/B2/32/WL0126/18 (Variation of WMILs B33/2/800/12/P70)	-	-	-	-
Worcester	Breede Valley LM	-	70	58	52	82

Number of landfill sites	8	18	25	21	24	34
Total score	522	1198	1458	1234	1610	2034
Average compliance (%)	65,3	66,6	58,3	58,8	67,1	59,8

Addendum B: Compliance and non-compliance with audit requirements

Table 2: Number of landfill sites, per province, that passed the audit (achieved 80% of the audit requirements)

Province	Number of landfill sites audited					Number of landfill sites that complied with more than 80% of the minimum requirements					Number of landfill sites that did not comply with the minimum requirements							
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023	2024	2019	2020	2021	2022	2023	2024	
Gauteng	21	16	17	19	15	21	11	11	9	11	3	6	10	5	8	8	12	15
KwaZulu-Natal	7	8	9	9	10	10	2	1	1	1	1	1	5	7	8	8	9	9
Limpopo	12	9	11	15	14	14	4	1	1	2	2	1	8	8	10	13	12	13
Mpumalanga	25	19	21	22	23	23	2	0	1	0	1	1	23	19	20	22	21	22
Northern Cape	12	15	16	18	17	22	2	0	1	1	0	0	10	15	15	17	17	22
North West	14	18	21	23	23	1	2	2	3	5	4	13	16	19	20	18	19	
Eastern Cape	6	6	7	6	8	10	2	1	0	0	2	2	4	5	7	6	6	8
Free State	20	25	24	25	27	28	0	0	0	0	0	0	20	25	24	25	27	28
Western Cape	9	19	27	25	25	38	4	8	12	12	14	12	5	11	15	13	11	26
National total	127	135	153	162	161	189	28	24	27	30	28	27	99	111	126	132	133	162

Addendum C: Landfill sites that passed the audit

Table 3: List of landfill sites that complied with 80% or more of the audit requirements

Province	Municipality	Name of landfill site	Score
Gauteng	Ekurhuleni LM	Alberton (Platkop)	98
	The Waste Group (Private)	Bon Accord	94
	Merafong City LM	Carletonville	88
	Mogale City LM	Luipaardsvlei	90
	Midvaal LM	Meyerton	82
	The Waste Group (Private)	Mooiplaats	98
KwaZulu-Natal	uMhlathuze LM	Richards Bay (Empangeni)	98
Limpopo	Greater Tzaneen LM	Tzaneen	88
Mpumalanga	Mbombela LM	Wittrivier transfer station	94
North West	Madibeng LM	Brits (Hartebeesfontein)	88
	Sibanye-Stillwater/Interwaste (Private)	Mooinooi	96
	Tlokwe LM	Potchefstroom transfer station	84
	Rustenburg LM	Rustenburg (Waterval)	100
Eastern Cape	Inxuba Yethemba LM	Cradock	90
	Buffalo City Metro	East London (Roundhill)	84
Western Cape	Overstrand LM	Gansbaai	100
	Cape Town Metro	Gordon's Bay transfer station	96
	Overstrand LM	Hermanus	98
	Saldanha LM	Langebaan transfer station	100
	Mossel Bay LM	Mossel Bay (Great Brak)	92
	Mossel Bay LM	Mossel Bay transfer station (Sonskynvallei)	84
	Swartland LM	Malmesbury (Highlands)	100
	Drakenstein LM	Paarl transfer station	96
	Stellenbosch LM	Stellenbosch	88
	Saldanha LM	Vredenburg	100
	Drakenstein LM	Wellington	100
	Breede Valley LM	Worcester	80





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