



LANDFILL SITE AUDIT



AfriForum



ALL PHOTOS IN REPORT: PHILIP ROBINSON AND AFRIFORUM BRANCHES

A word of thanks

A big thank you to AfriForum's staff and all the AfriForum branches across South Africa who have made this project possible. Your participation in this national project proves that you share the vision of sustainable development and responsible waste management in South Africa with us.

While this project highlights the huge, unenviable waste management shortcomings in South Africa, each of the municipalities and private operators who do their job impeccably – thereby ensuring that their landfill sites pass AfriForum's audit – should be thanked. Responsible waste management and

compliance with applicable legislation and licensing conditions ensure that communities and the environment are protected from pollution. These municipalities and private operators are leading the way and setting an example for good waste management, despite South Africa's challenging circumstances.

Thank you to the Department of Forestry, Fisheries and the Environment's (DFFE's) Waste Management Division who supports this project and encourages their provincial task team to participate in branch audits.

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

Content

A word of thanks.....	3
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.....	10
Audit requirements	10
Additional questions.....	11
Points allocation and pass rate.....	11
2025 audit results.....	13
National overview	13
Number of sites audited.....	13
Compliance with the audit pass rate.....	14
Average performance	17
Performance per province.....	18
Eastern Cape.....	18
Free State.....	19
Gauteng.....	20
KwaZulu-Natal	21
Limpopo	22
Mpumalanga	23
Northern Cape.....	24
North West.....	25
Western Cape	26
Sample size.....	27
Trends	27
Discussion	30
Next steps.....	33
Immediate action plan	33
Sustainable solutions	33
Cooperation.....	34
Community self-reliance	35
Summary.....	36
Addendum A: Audit scores of every landfill site audited	37
Eastern Cape.....	37
Free State	38
Gauteng	39
KwaZulu-Natal	41
Limpopo.....	42
Mpumalanga	43
Northern Cape	44
North West.....	45
Western Cape.....	46
Addendum B: Compliance and non-compliance with audit requirements	49

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 165 branches across South Africa are situated, comply with a simplified set of requirements based on waste management legislation and the licence conditions of landfill sites that set a benchmark for responsible waste management. In order to do this, landfill site audits were carried out in the relevant municipalities to determine whether the audit requirements for responsible waste management were being met. The audit results for each landfill site 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 audit requirements for responsible waste management 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, which is not only a violation of the constitutional right to a clean environment, but also endangers the ecology and the health of communities.

In order to protect communities and the environment, this project aims to equip South Africans with knowledge about the state of landfill site management, hold relevant officials accountable, and foster collaboration between communities and the three spheres of government, namely the Department of Forestry, Fisheries and the Environment (DFFE) at national level, the various provincial departments at provincial level, and municipalities at the local level. The latter is the most important from a waste management perspective, 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.

Informal recycling and shacks on the Bloemfontein South landfill site in the Free State.





A broken weighbridge, looted infrastructure and lack of access control at Hartswater's landfill site in the Northern Cape.

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 some rights – 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).

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 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 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.

The illegal dumping of old tyres is a general problem on municipal landfill sites as seen here on Potchefstroom's Felophepa landfill site in the North West province.



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 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 type 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 rubbish bins.

The problem

While South Africa's municipalities are becoming increasingly unreliable as providers of waste management services, factors such as population growth, urbanisation and an increase in disposable income are leading to higher volumes of waste that are putting pressure on the waste removal services and waste management infrastructure of municipalities, which include the 544 landfill sites in the country.

According to the DFFE's *State of Waste Report* (2022), South Africa generates approximately 107,7 million tons of waste annually. The DFFE indicates that about 65% of general waste in South Africa ends up in landfill sites, although industry experts estimate that as much as 90% of all waste ends up in landfill sites or illegal dumping sites and that only about 10% of all waste in the country is recycled.

Data presented to parliament by the DFFE in March 2025 about the state of South Africa's landfill sites, indicates that out of the 154 sites visited by the department in 2023/2024, there

were only 16% (25 sites) that complied with the applicable legal prerequisites, while 24% (37 sites) complied partially and 60% (92 sites) did not comply.

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 enter the surrounding natural water sources and penetrate the 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 near 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 them.

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.

At 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 to discuss the findings. Municipalities are notified in

writing in advance and are also invited to accompany AfriForum during inspections.

During February 2025, a sample of municipal landfill sites was visited and audited by AfriForum members from the communities across the country where AfriForum's 165 branches are located. Participants were accompanied by AfriForum's provincial coordinators and, where applicable, other stakeholders such as municipal officials and the media. Participants 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

To get an indication of whether a landfill site complies with the applicable legal requirements regarding waste management, an audit questionnaire was compiled primarily on the basis of the minimum requirements. The audit questionnaire consists of 33 questions and covers the most important aspects of good waste management that a landfill site (and where applicable, a waste transfer facility) must comply with. An example of the audit questionnaire is shown further below.

Previously, the legally enforceable requirements that a landfill site had to comply with under the Environment Conservation Act 73 of 1989 were imposed through the issuance of landfill site permits. However, the enactment of the National Environmental Management: Waste Act 59 of 2008 and subsequent regulations significantly changed the legislative framework for the disposal of waste to landfill sites. Landfill site permits were replaced by waste management licenses while the Regulations for waste classification and management were implemented in 2023 to prescribe requirements for the disposal of waste to landfill sites. Furthermore, the regulations expressly stipulate that waste managers who dispose of waste to landfill sites must only do so in accordance with the norms and standards.

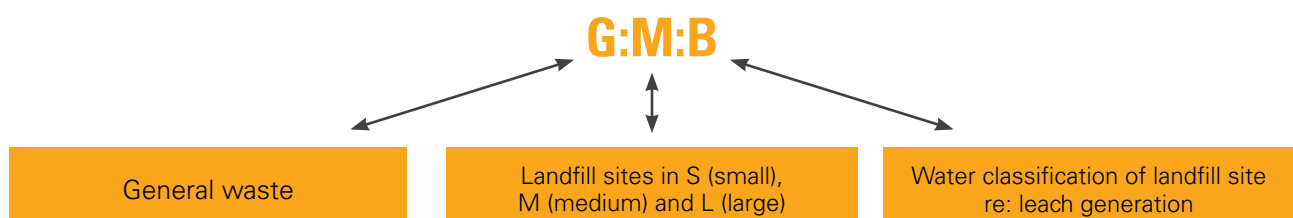
Given that the norms and standards had come into force, the validity of using the minimum requirements as a benchmark for the 2023 audit was questioned. Consequently, AfriForum requested an expert in waste management involved at the Council for Scientific and Industrial Research (CSIR), Prof. Suzan Oelofse, to conduct a critical review of the minimum requirements. The objective of this study was to determine which of the requirements contained in the minimum standards were also included in the norms and standards, and whether there were other requirements that were omitted from the norms and standards, but still served as a

good benchmark despite their omission.

Prof. Oelofse is of the opinion that the minimum requirements still serve as a good benchmark, 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 purpose, the minimum requirements are appropriate, as they set out basic guidelines for how landfill sites should be designed, constructed and managed to prevent harmful pollution. When these guidelines for the safe handling of waste are followed, they help to protect our water, soil and air from pollution.

A further motivation for using the minimum requirements as a benchmark for the audit is the fact that each landfill site has a unique permit or licence with requirements that may deviate from the minimum requirements and/or norms and standards, whichever may be applicable. For example, hazardous waste that is not normally permitted at a particular landfill site may in certain cases be permitted under the specific landfill site's license conditions. Many landfill sites are however still unlicensed, leaving these sites stranded in a legal grey area.

In addition, landfill sites are classified into three sizes – each with its own requirements. The general rule is: The larger the site, the stricter the requirements. Although this classification in accordance with the minimum requirements was replaced by the norms and standards that came into effect, its use for the purposes of the audit is justified because most – if not all – of the sites investigated were established before the norms and standards came into effect. Therefore, the questionnaire that AfriForum has compiled can be applied to any general (G-type) landfill site. The classification system works as follows:



For AfriForum's purposes, the minimum requirements therefore remain the most appropriate measure for obtaining an indication of whether a landfill site complies with the applicable measures pertaining to responsible waste management. Therefore, AfriForum's audit questionnaire is still primarily based on the minimum requirements.

Some of the simple measures that must be in place to manage a landfill site responsibly, and on which the audit requirements focus, include the following:

- Information such as the landfill site's permit or licence number, business hours and dumping tariffs must be clearly displayed at the entrance.
- Access control must be applied.
- Inspection of loads need to take place, so only authorised waste is dumped.
- There must be a functional weighbridge.
- Records must be kept of the weight and type of waste that is dumped.
- Dumping rates must be collected.
- Roads must be passable.
- Stormwater must be diverted around operational areas.
- A site manager must be present (to implement management plans) as well as personnel with the necessary competence to operate machinery.
- There must be working machinery on site with which waste can be compacted and covered with soil on a daily basis.
- Only registered informal recyclers wearing protective clothing may work on site, within a demarcated area outside of the operational area of the landfill site.

Additional questions

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, the following data was collected where possible:

- *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?*

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

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 site meets the audit requirements. 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.

To pass the audit, a landfill site must meet at least 80% of the audit requirements.

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:

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

total was divided by the number of sites in that province.

Example:

In KwaZulu-Natal ten landfill sites were audited in 2024 as well as 2025. Therefore:

$$60 + 72 + 30 + 30 + 22 + 16 + 28 + 98 + 34 + 32 = 422; \text{ therefore } 422/10 = 42\% \text{ average in 2024}$$

$$98 + 72 + 14 + 66 + 22 + 30 + 32 + 88 + 28 + 10 = 460; \text{ therefore } 460/10 = 46\% \text{ average in 2025}$$

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 2021 to 2025. The compliance points that were allocated to each individual site in a specific province were added up, after which the

It can be concluded that waste management at landfills in the following example improved by four percentage points from 2024 to 2025.

Example of a questionnaire:

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

Mark the audit outcome with x in the relevant block. Use own discretion, with minimum requirement as outcome.

Multiply audit outcome with weight of question to calculate compliance score.

Weight of question

Score for main category

Minimum requirement	Fully compliant 1	Partially compliant ½	Non-compliant 0	Comments	Weight	Score
1. Access and control						
1.1 Signs						
a) Signs in the appropriate official languages must be erected in the vicinity of the landfill site, indicating the route to the landfill site from the nearest main roads.	x				½	0,5
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			½	0,25
1.2 Road access						
a) Are all roads to the site and within the site maintained?			x	Roads inaccessible as a result of mud during visit.	1	0

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

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

2025 audit results

This report enunciates the 2025 audit results. For comparison purposes, the 2021 to 2024 results were also included. The audit results of 2014 to 2020 have been omitted from this report, but can be supplied on request. The questionnaire was revised and updated in 2017 and differs from the questionnaire that was used from 2014 to 2016. Please note: Data in this report was rounded off, thus percentages will not necessarily add up to 100.

An overview of the results is described below, while the full compliance scores of each landfill site audited are set out per province in Addendum A, and consolidated in Addendum B to indicate the number of landfill sites that passed the audit (complied with 80% of the audit requirements) or not.

National overview

Number of sites audited

- Every year, efforts are made to expand the project. In 2025 a total of 169 landfill sites were audited, eight fewer than in 2024 due to operational constraints. Out of the 169, 166 were municipal landfill sites and three were private landfill sites.
- In addition to the 169 sites where audits were done, at some other sites audits could not be conducted because:
 - the site was closed by the relevant authorities (seven sites);
 - the site has already been rehabilitated (three sites); or
 - the site was too dangerous for the public to visit (one site).



Figure 1: Number of landfill sites audited during the period 2021–2025

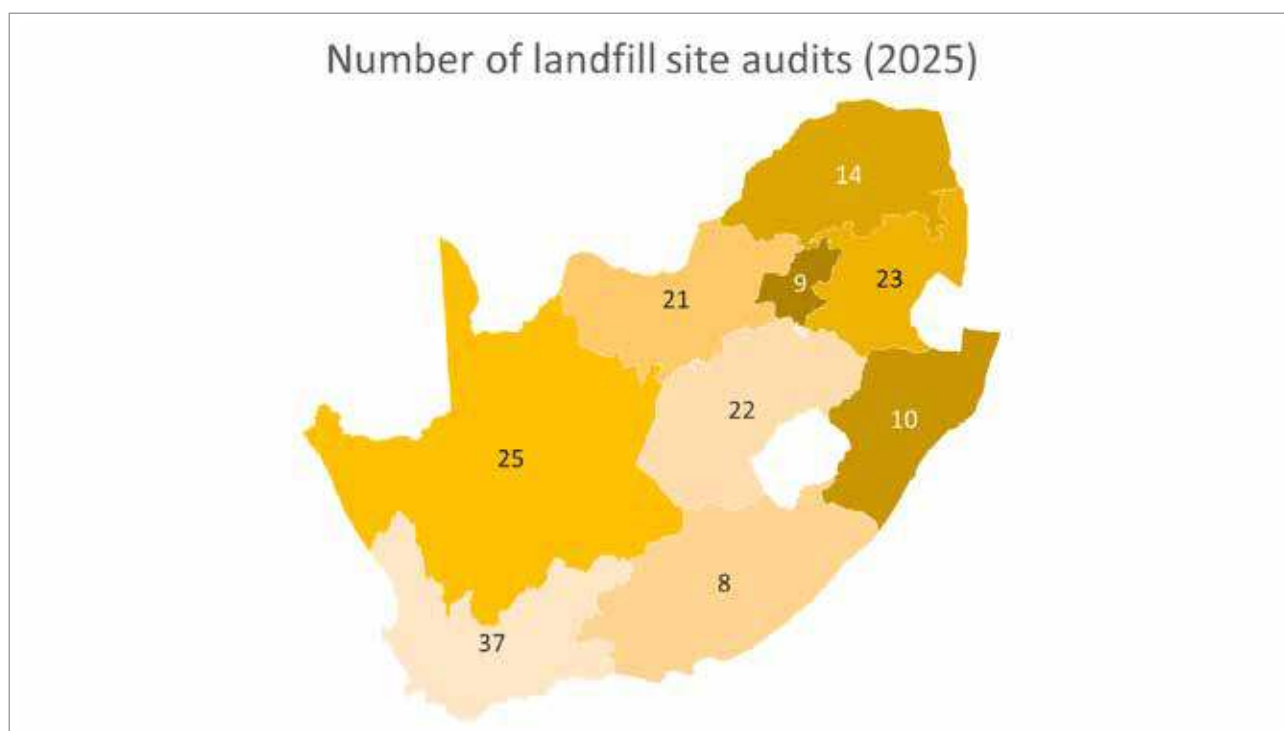


Figure 2: Number of landfill sites audited per province in 2025

Compliance with the audit pass rate

- 38 of the 169 landfill sites that were audited in 2025 (22%) met the audit pass rate of 80% or more of the audit requirements.
- 131 of the 169 landfill sites that were audited in 2025 (78%) did not pass the audit.
- The province that had the highest average compliance score is Gauteng, where five of the nine sites (56%) met 80% or more of the audit requirements, followed by the Western Cape, with 19 of 37 sites (51%) that met the audit pass rate. These are the only two provinces where the majority of landfill sites passed the audit.

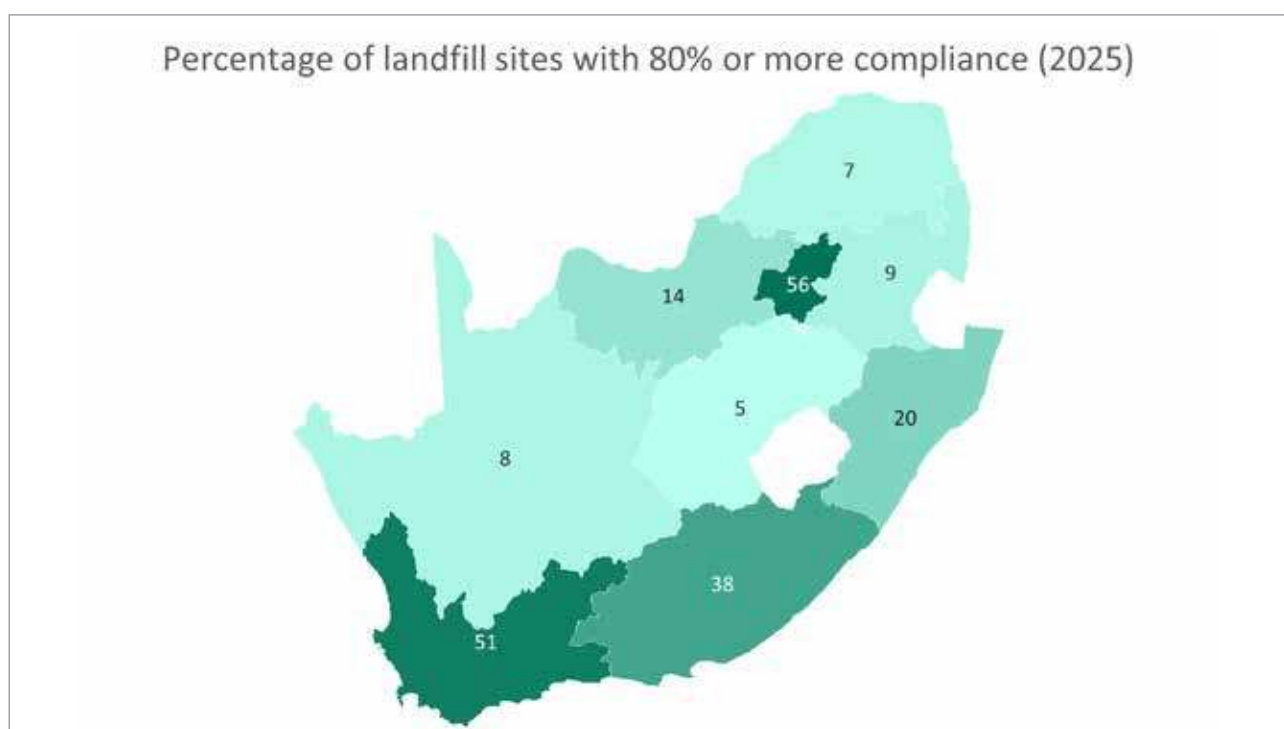


Figure 3: Percentage of landfill sites, per province, that passed the audit (2025)

- Of the 38 sites that passed the audit:
 - 19 are in the Western Cape;
 - five are in Gauteng;
 - three each are in North West and the Eastern Cape;
 - two each are in KwaZulu-Natal, Mpumalanga and the Northern Cape; and
 - one each is in Limpopo and the Free State.
- More than 90% of landfill sites in the Free State, Limpopo, the Northern Cape and

Mpumalanga didn't pass the audit. The number of sites in each of these provinces that did not comply with the audit pass rate are as follows:

- 21 of the 22 sites (95%) audited in the Free State
- 13 of the 14 sites (93%) audited in Limpopo
- 23 of the 25 sites (92%) audited in the Northern Cape
- 21 of the 23 sites (91%) audited in Mpumalanga

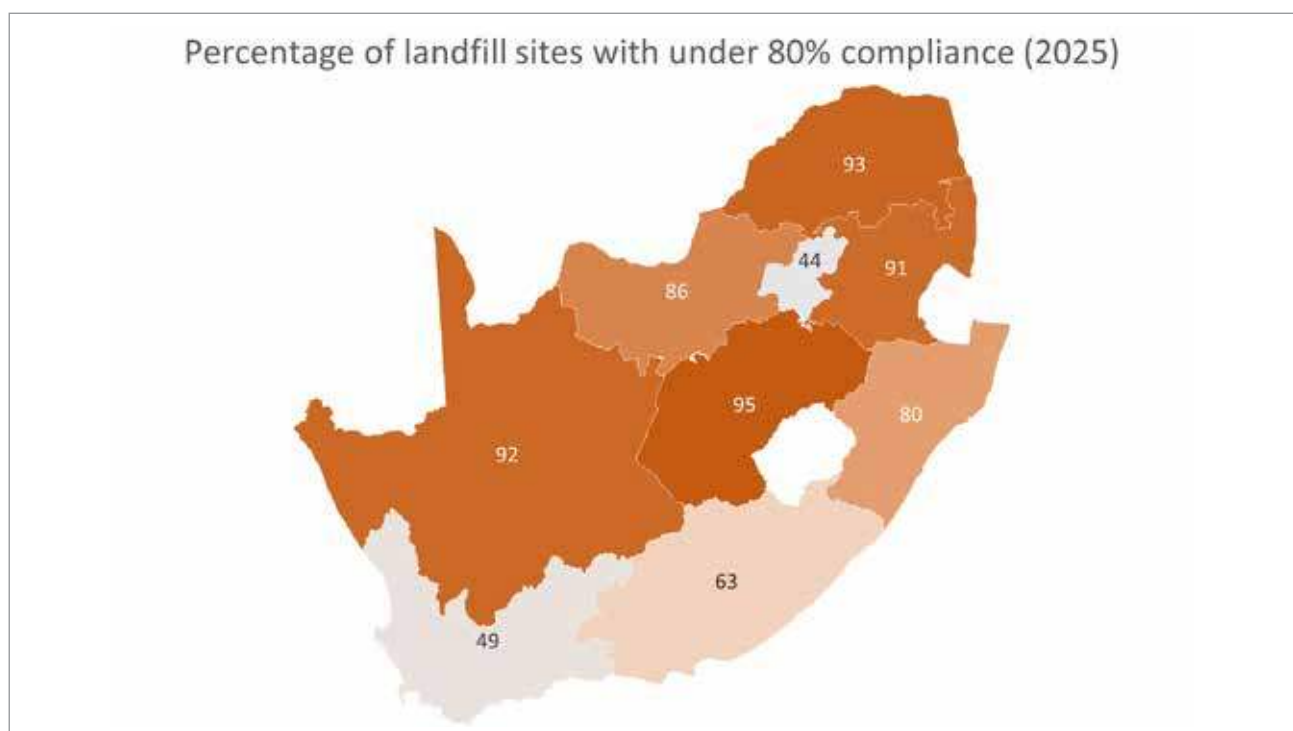


Figure 4: Percentage of landfill sites, per province, that did not pass the audit (2025)

Table 1: Landfill sites that passed the audit in 2025

LANDFILL SITES THAT COMPLIED WITH 80% OR MORE OF THE AUDIT REQUIREMENTS IN 2025			
Province	Municipality/responsible entity	Name of landfill site	Score
Gauteng	Ekurhuleni Metro	Alberton – Platkop	100
		Boksburg – Rooikraal	98
		Springs – Rietfontein	96
	The Waste Group	Bon Accord	96
		Mooiplaats	100
KwaZulu-Natal	eThekweni Metro	Amanzimtoti (eManzimtoti) – Seadoone waste transfer facility	98
	uMhlathuze LM	Richard's Bay – Empangeni	88
Limpopo	Greater Tzaneen LM	Tzaneen	82
Mpumalanga	Mbombela LM	Witrivier waste transfer facility	86
	Steve Tshwete LM	Hendrina waste transfer facility	88
Northern Cape	Orania Dorpsraad	Orania	82
	Phokwane LM	Jan Kempdorp	96
North West	Madibeng LM	Brits – Hartbeesfontein	88
	Rustenburg LM	Rustenburg – Waterval	96
	Sibanye-Stillwater (Interwaste)	Mooinooi	98
Eastern Cape	Buffalo City Metro	East London – Roundhill	100
	Inxuba Yethemba LM	Cradock (Nxuba)	86
	Kouga LM	Humansdorp	80
Free State	Metsimaholo LM	Sasolburg – Vaalpark waste transfer facility	86
Western Cape	Breede Valley LM	Worcester	86
	Drakenstein LM	Paarl waste transfer facility	100
		Wellington	90
	George LM	George – Gwaing	84
	Hessequa LM	Albertinia	82
		Slangrivier	80
	Cape Agulhas LM	Bredasdorp	82
	Cape Town Metro	Gordon's Bay waste transfer facility	100
	Langeberg LM	Montagu – Bessieskop 4	84
	Mossel Bay LM	Mossel Bay – Great Brak	86
		Mossel Bay – Sonskynvallei waste transfer facility	80
	Overstrand LM	Gansbaai	100
		Hermanus	100
		Kleinmond waste transfer facility	98
	Saldanha Bay LM	Langebaan waste transfer facility	100
		Vredenburg	100
	Stellenbosch LM	Stellenbosch	100
	Swartland LM	Malmesbury – Highlands	100
	Swellendam LM	Swellendam	88

Key
Private landfill site
Waste transfer facility

Average performance

- The national average compliance score in 2025 is 42%.
- The province with the highest average compliance score in 2025 is Gauteng (84%), followed by the Western Cape (66%).
- The province with the lowest average compliance score in 2025 is the Northern Cape (13%), followed by the Free State (18%).

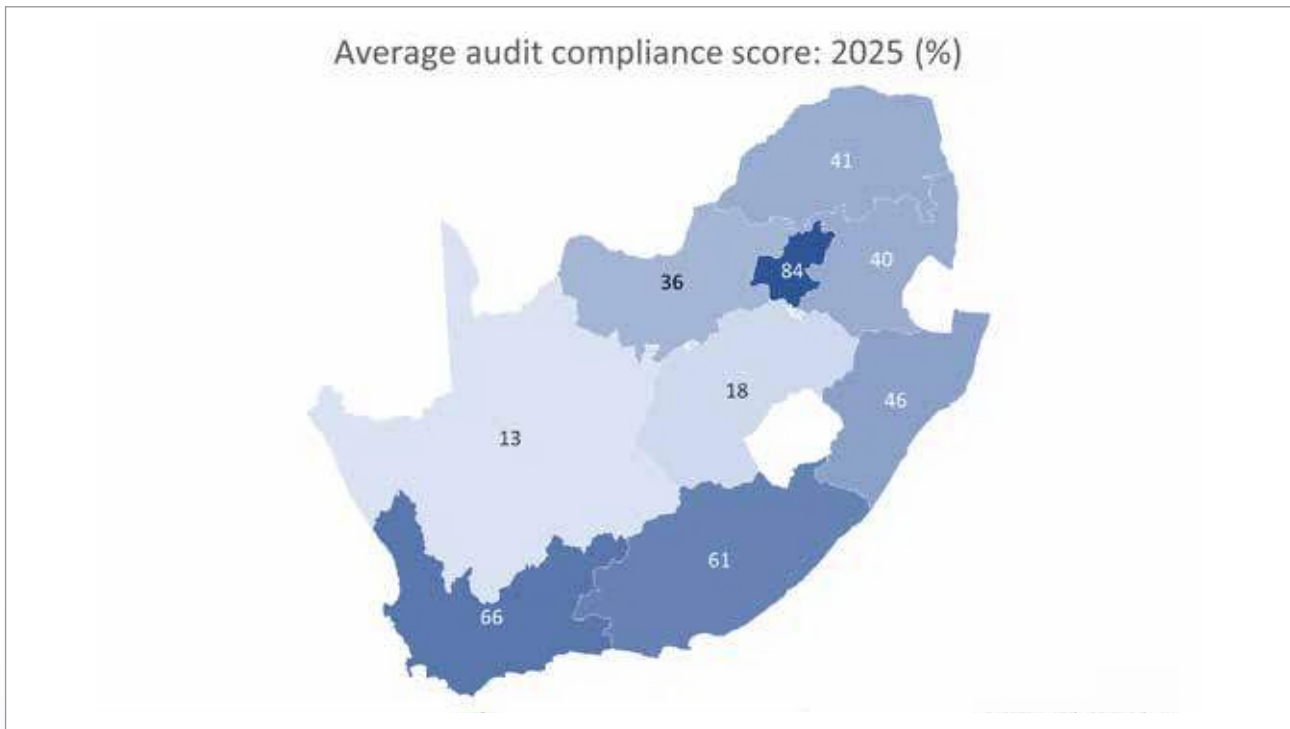


Figure 5: Average provincial audit score: 2025 (%)



Performance per province: Eastern Cape

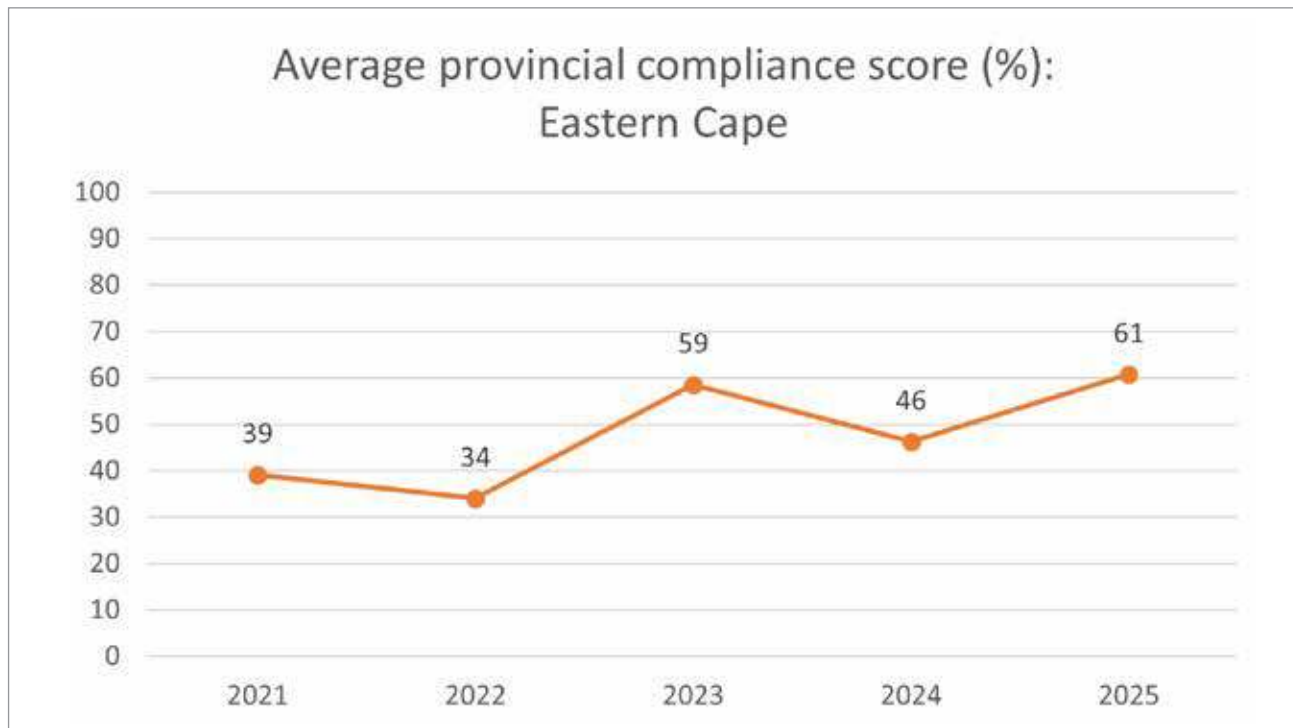


Figure 6: Average provincial compliance score: Eastern Cape

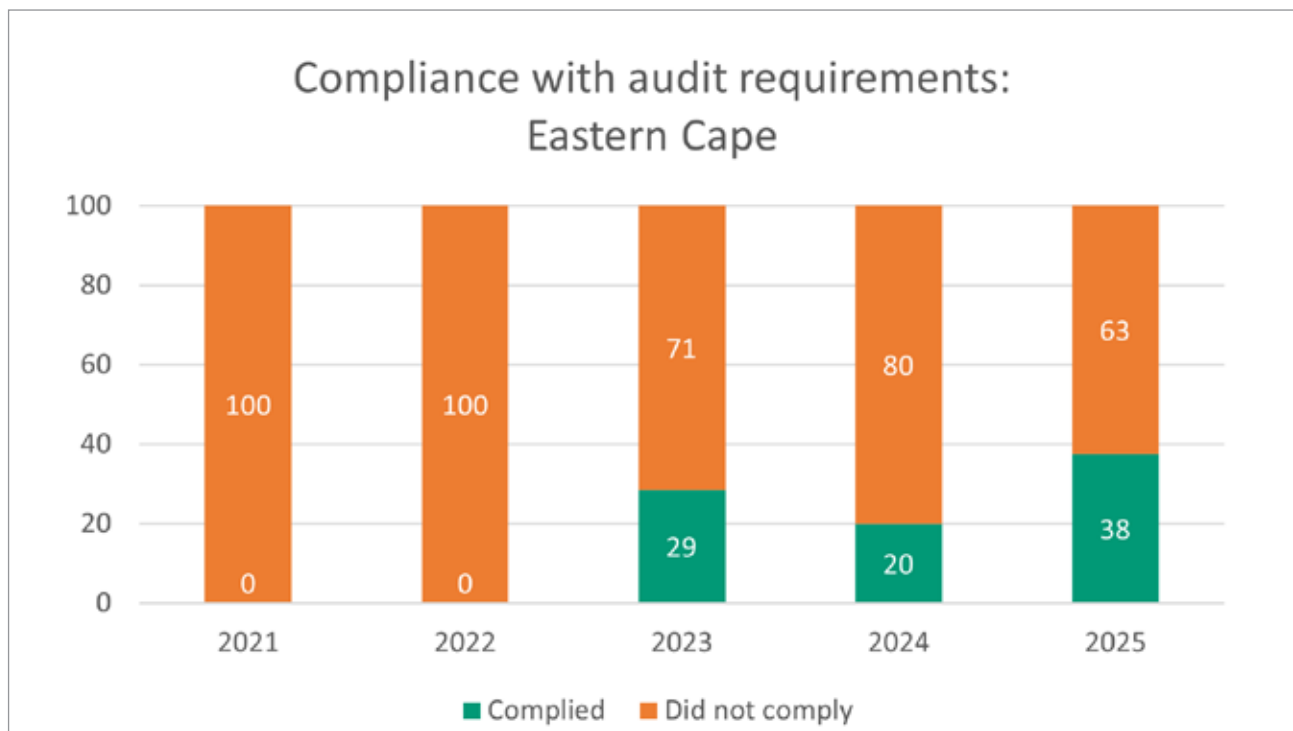


Figure 7: Percentage compliance versus non-compliance of landfill sites: Eastern Cape

Free State

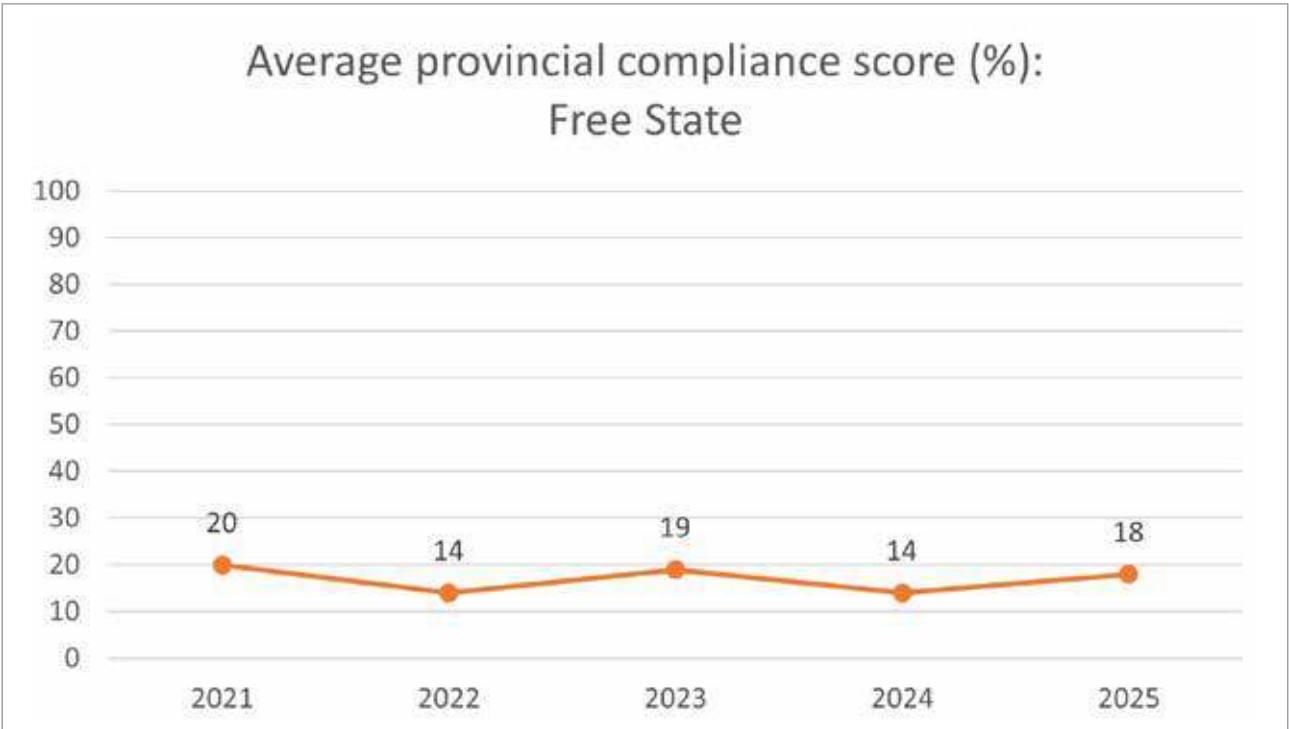


Figure 8: Average provincial compliance score: Free State



Figure 9: Percentage compliance versus non-compliance of landfill sites: Free State

Gauteng

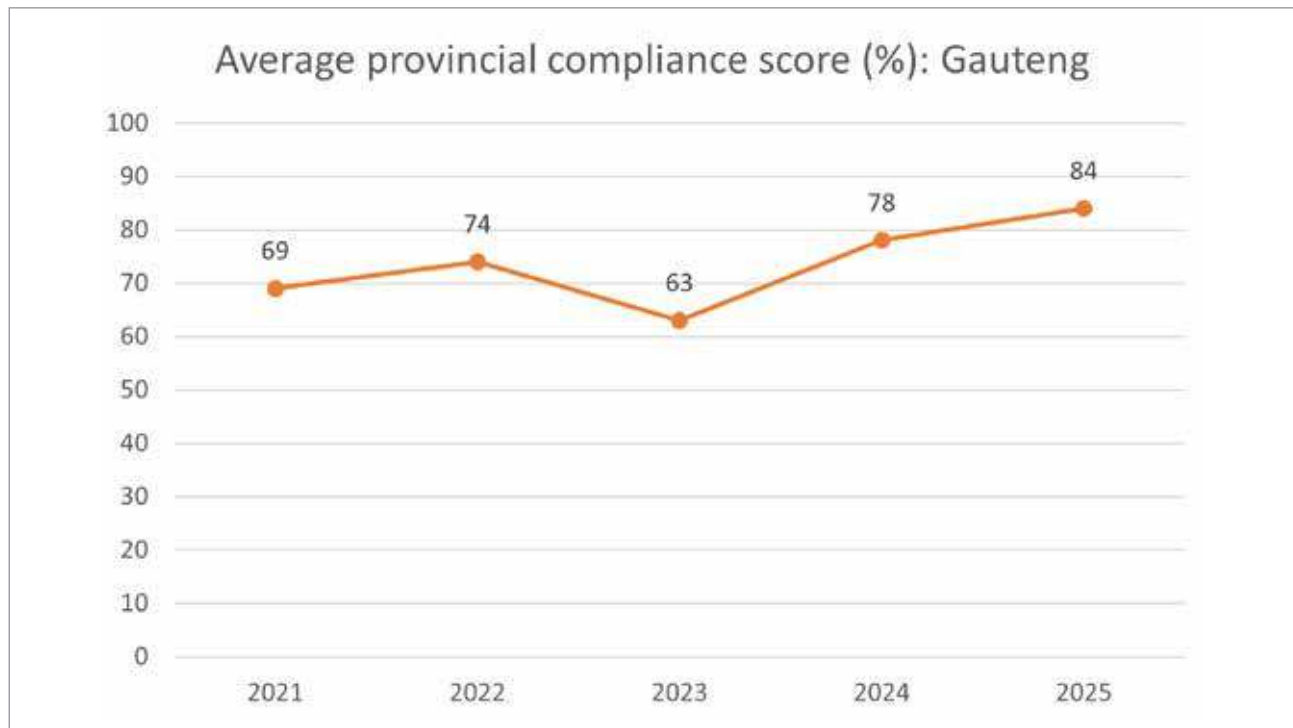


Figure 10: Average provincial compliance score: Gauteng

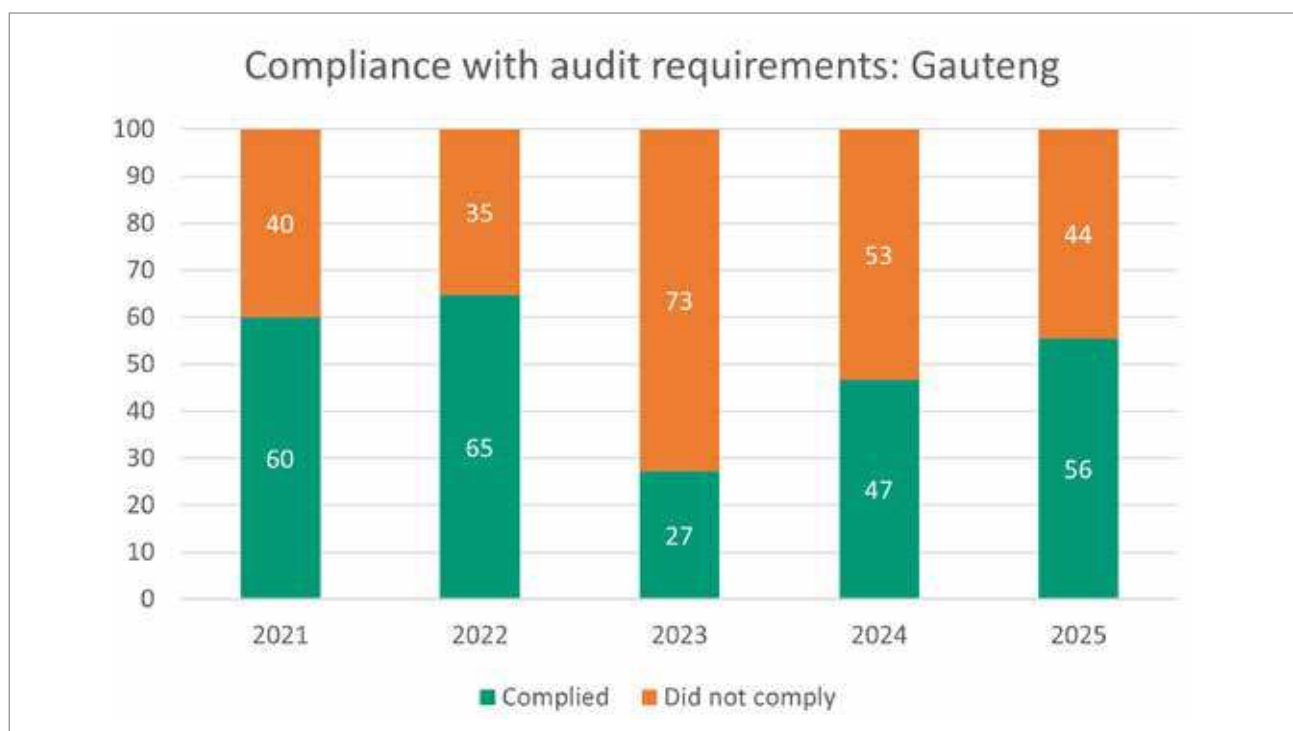


Figure 11: Percentage compliance versus non-compliance of landfill sites: Gauteng

KwaZulu-Natal

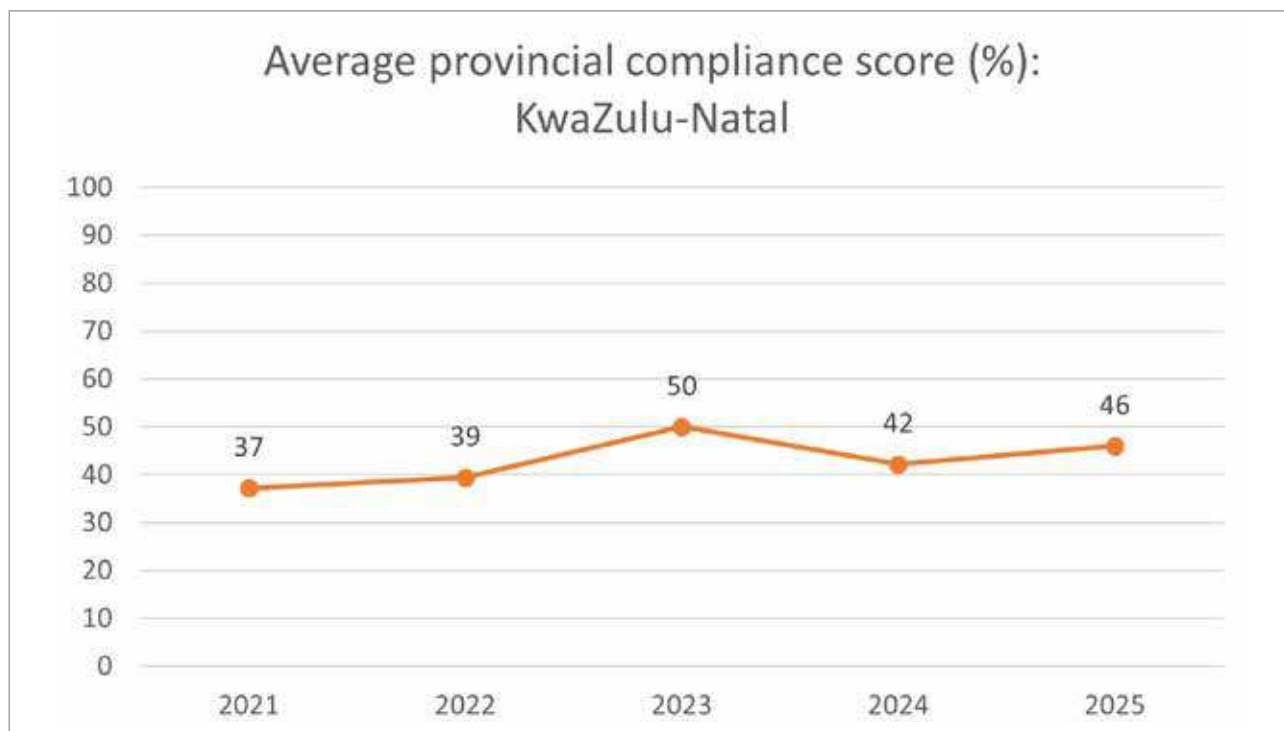


Figure 12: Average provincial compliance score: KwaZulu-Natal

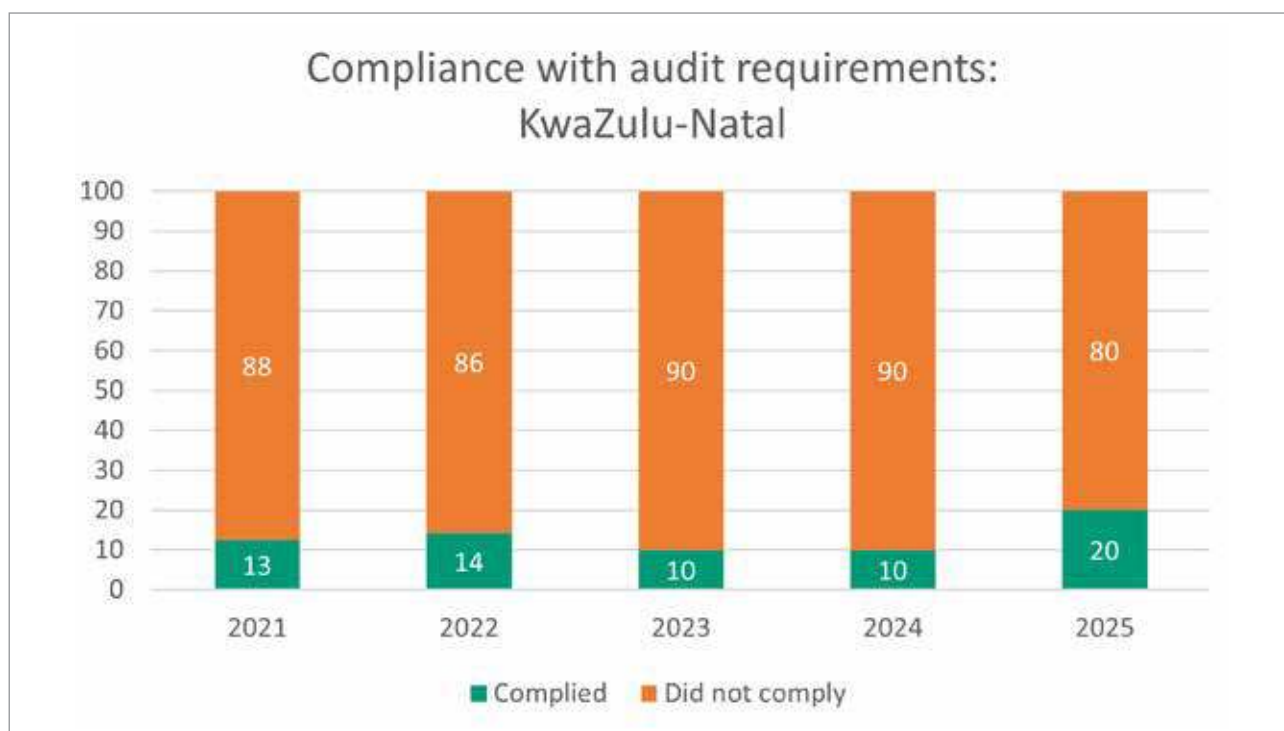


Figure 13: Percentage compliance versus non-compliance of landfill sites: KwaZulu-Natal

Limpopo

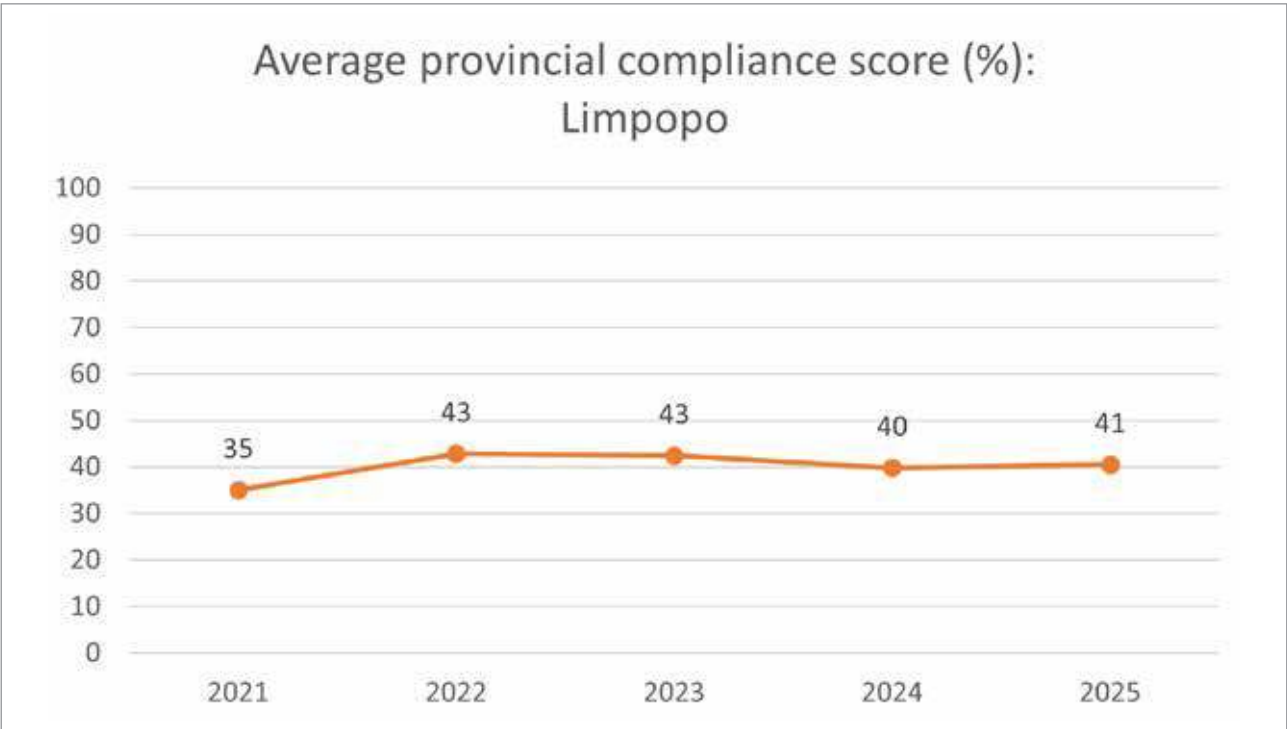


Figure 14: Average provincial compliance score: Limpopo

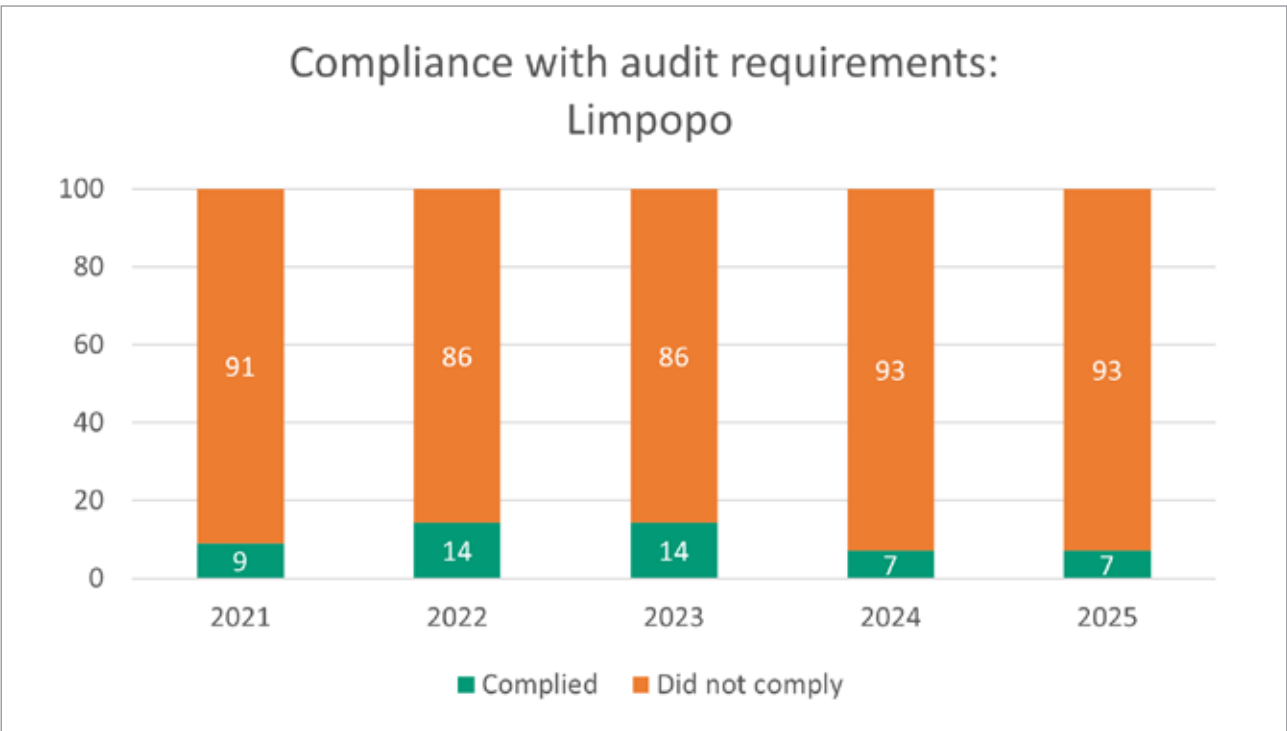


Figure 15: Percentage compliance versus non-compliance of landfill sites: Limpopo

Mpumalanga

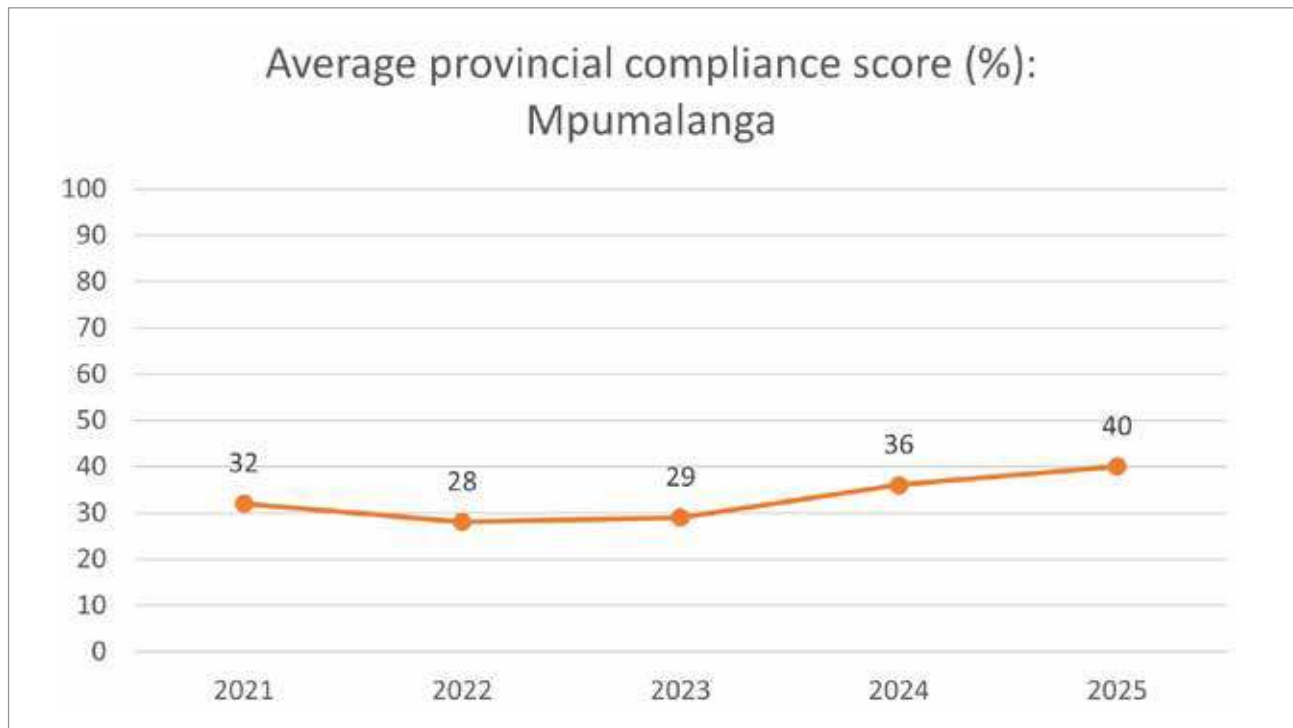


Figure 16: Average provincial compliance score: Mpumalanga

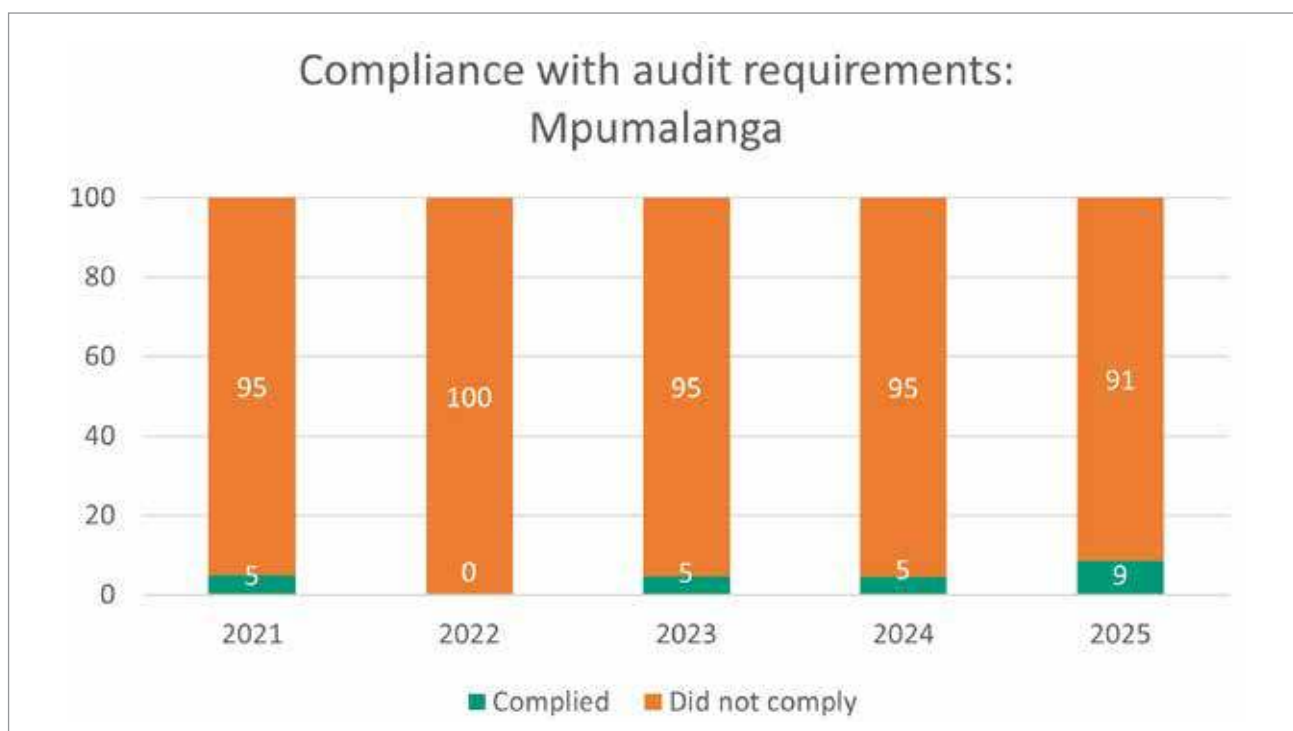


Figure 17: Percentage compliance versus non-compliance of landfill sites: Mpumalanga

Northern Cape

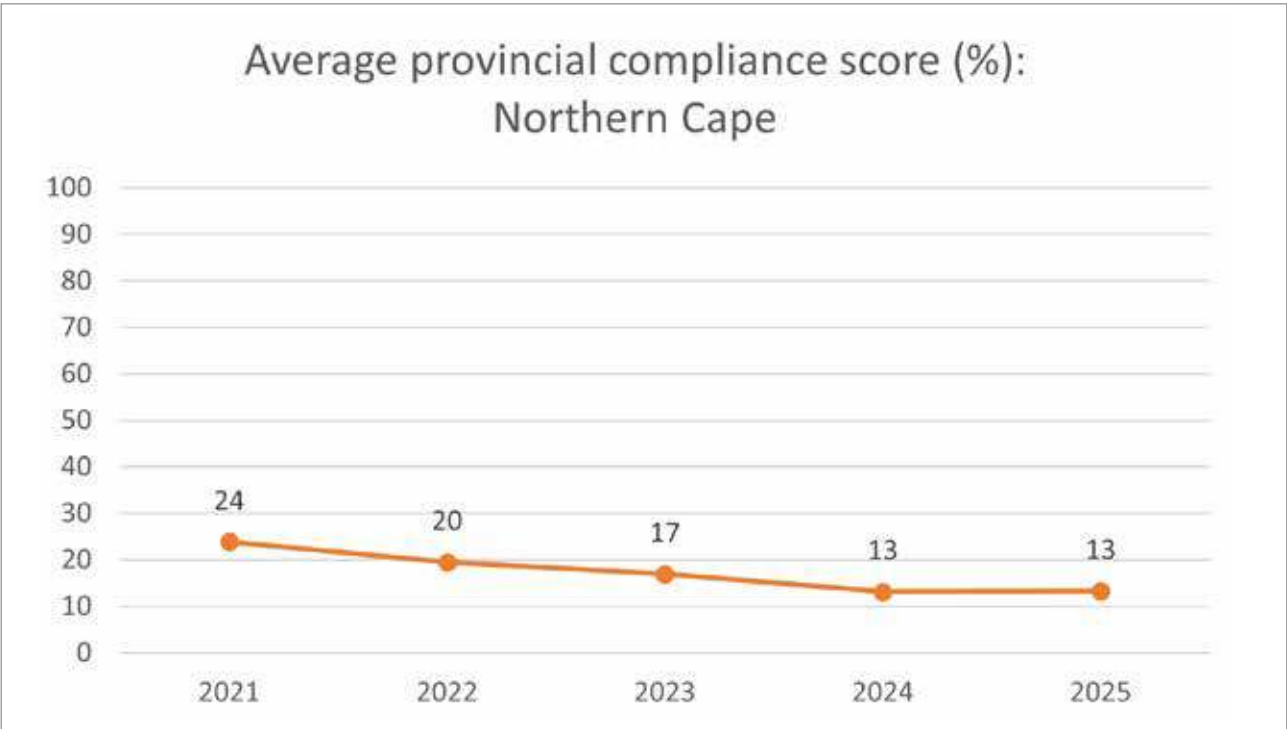


Figure 18: Average provincial compliance score: Northern Cape

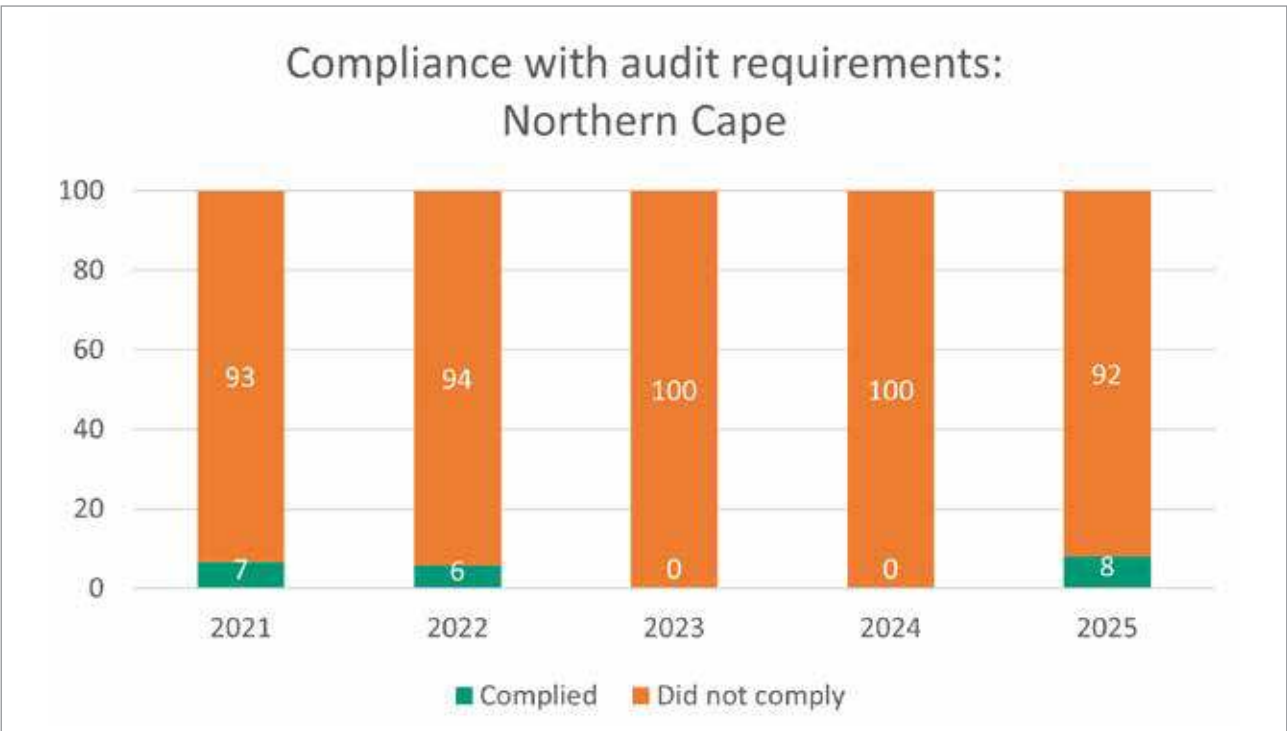


Figure 19: Percentage compliance versus non-compliance of landfill sites: Northern Cape

North West

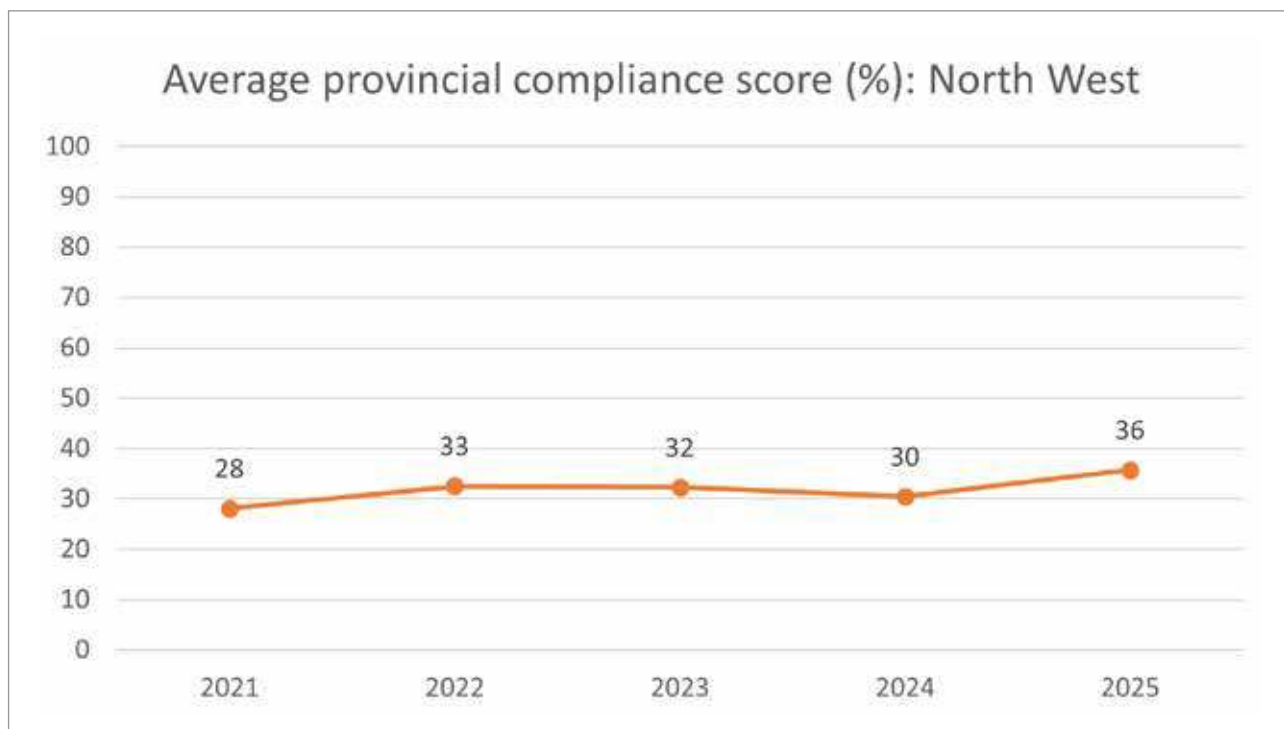


Figure 20: Average provincial compliance score: North West

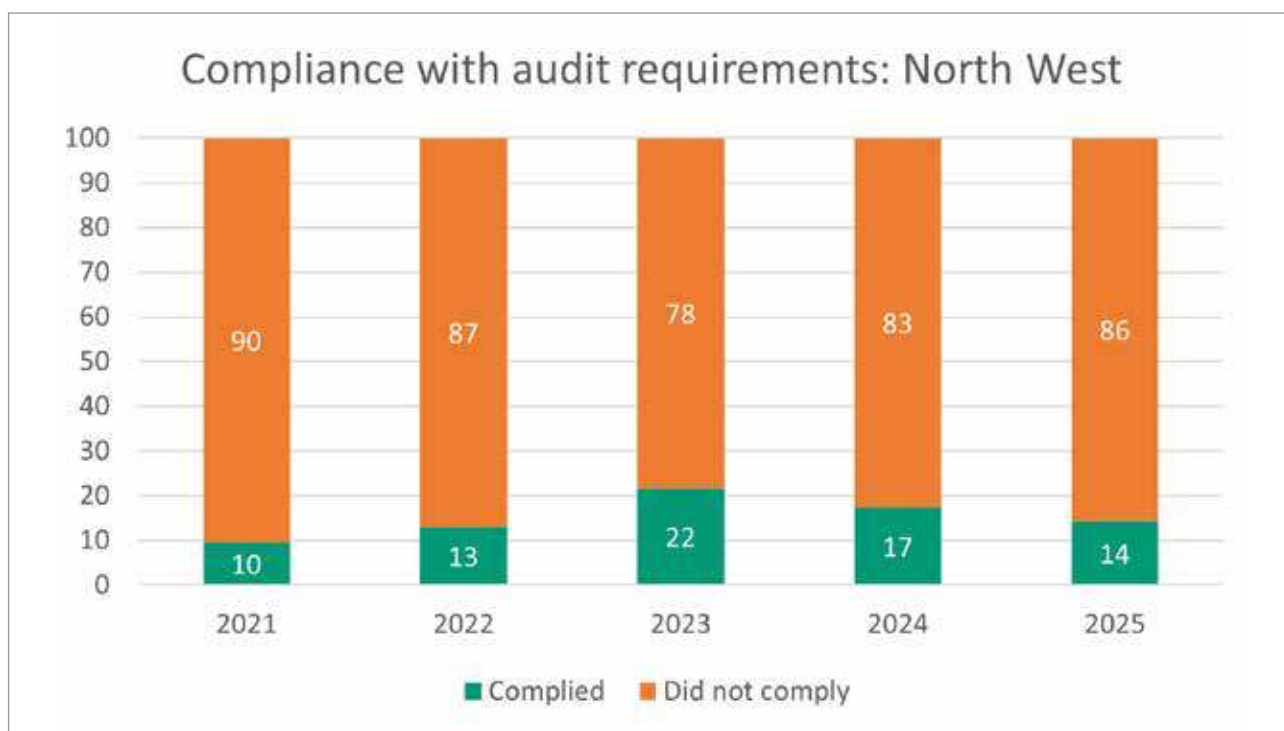


Figure 21: Percentage compliance versus non-compliance of landfill sites: North West

Western Cape

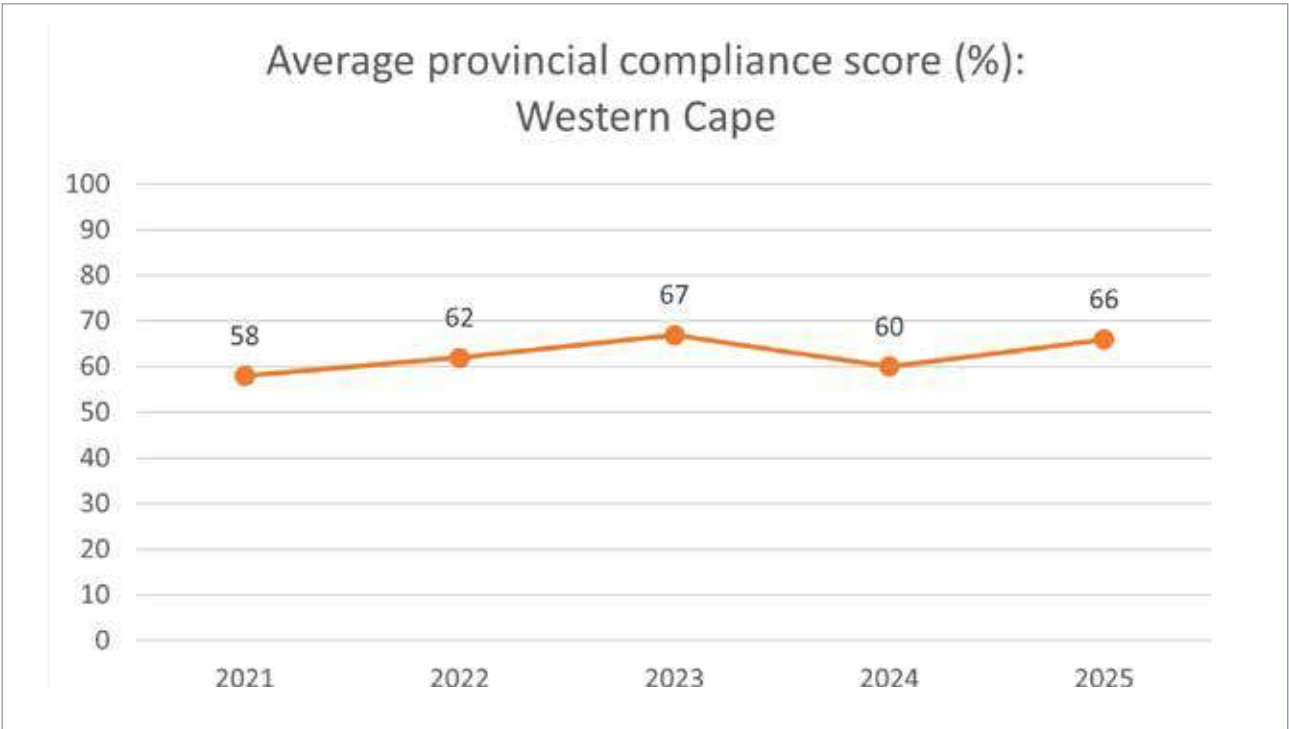


Figure 22: Average provincial compliance score: Western Cape

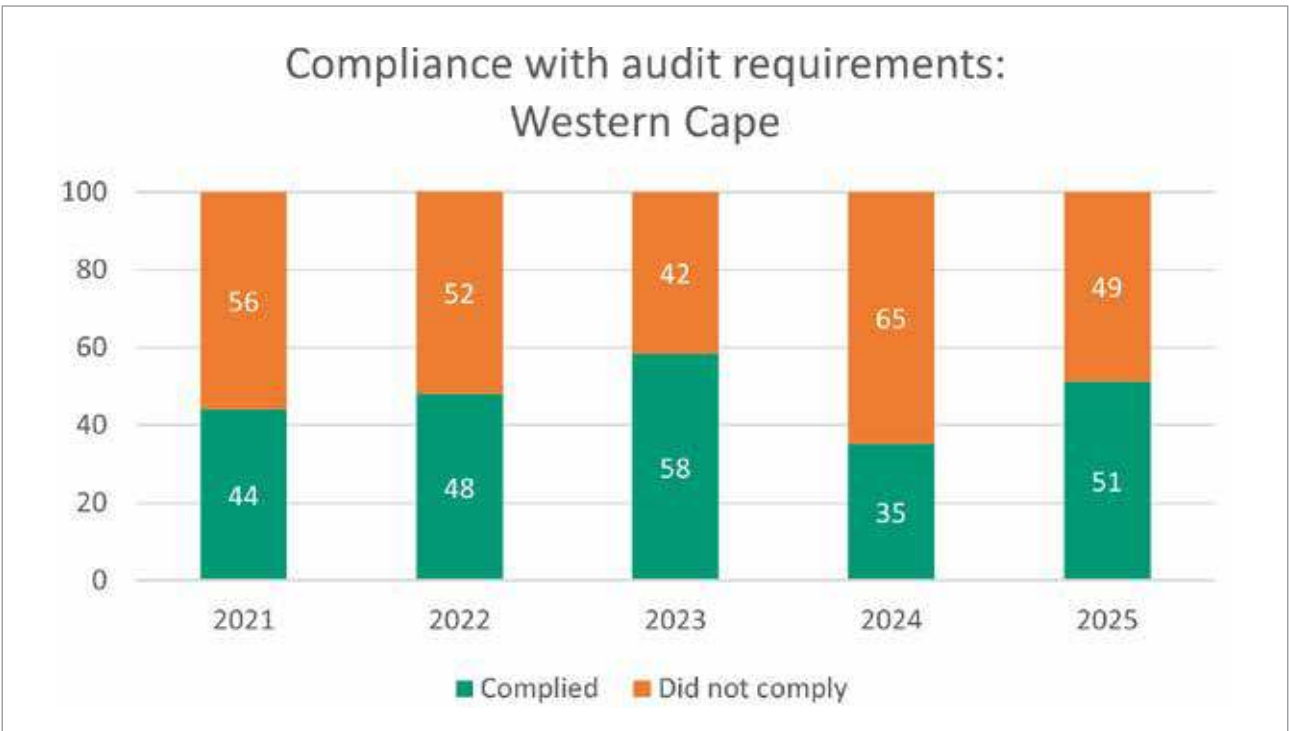


Figure 23: Percentage compliance versus non-compliance of landfill sites: Western Cape

Sample size

- AfriForum's landfill site audit's sample size of 169 (or 31%) of the country's 544 landfill sites is large enough to draw accurate conclusions about the state of the country's landfill sites.
- Based on AfriForum's sample (of which 22% of landfill sites passed the audit) we are 95% certain that, if AfriForum had conducted audits of each of the country's 544 landfill sites, between 17% and 27% of these sites would have passed the audit.

Trends

- With 22% of landfill sites that met the audit pass rate of 80% or more of the audit requirements in 2025, this is the highest proportion of landfill sites that passed the audit in the past five years (18%, 19%, 18% and 16% in each of the years 2021–2024, respectively).
- Similarly, the national average compliance score of 42% is the highest in the past five years. The lowest national average compliance score during this period was 38%, reached in 2021.



Figure 24: Average national audit compliance score: 2021–2025 (%)



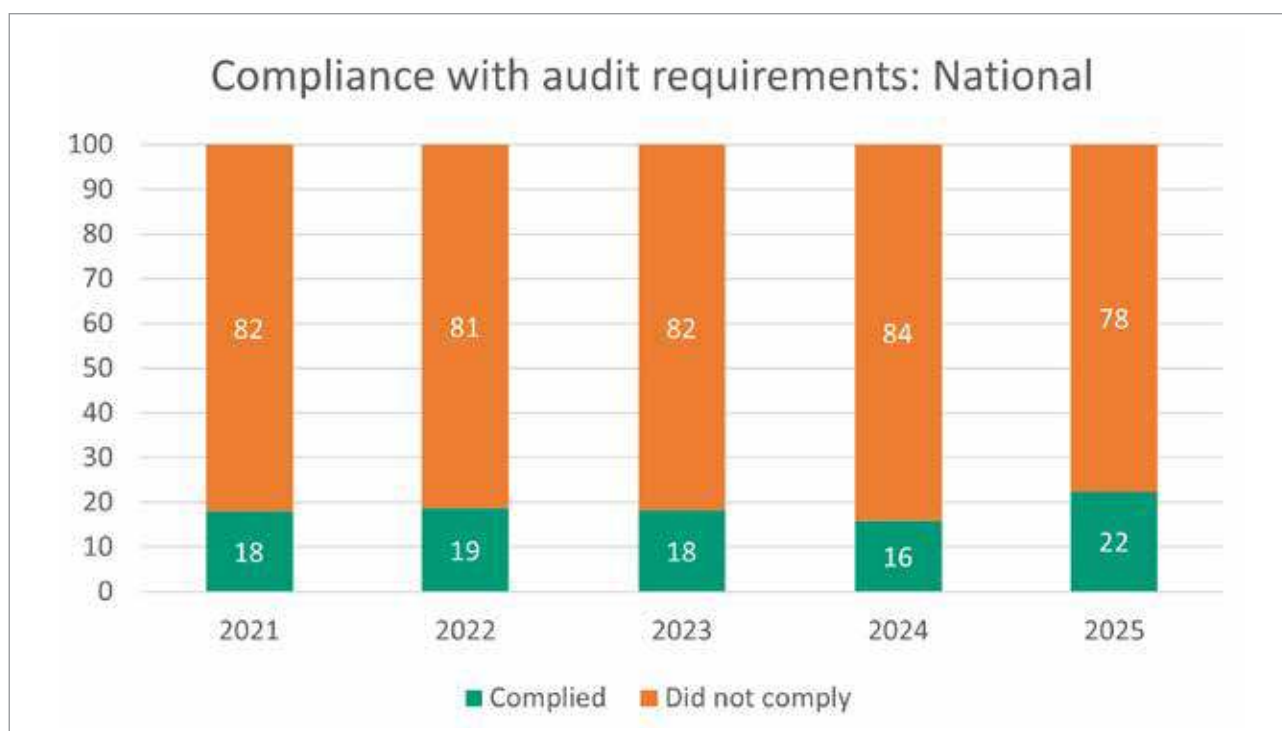


Figure 25: Percentage compliance versus non-compliance of landfill sites: National (2025)

- Measured against 1. compliance with the audit pass rate and 2. the average compliance score, there were improvements from 2024 to 2025 in the following provinces.
 - Gauteng:
 - Compliance with audit pass rate improves from 47% to 56%.
 - Average compliance score improves from 78% to 84%.
 - KwaZulu-Natal:
 - Compliance with audit pass rate improves from 10% to 20%.
 - Average compliance score improves from 42% to 46%.
 - Mpumalanga:
 - Compliance with audit pass rate improves from 5% to 9%.
 - Average compliance score improves from 36% to 40%.
 - Eastern Cape:
 - Compliance with audit pass rate improves from 20% to 38%.
 - Average compliance score improves from 46% to 61%.
 - Free State:
 - Compliance with audit pass rate improves from 0 to 5%.
 - Average compliance score improves from 14% to 18%.
 - Western Cape:
 - Compliance with audit pass rate improves from 35% to 51%.
 - Average compliance score improves from 60% to 66%.
- Despite the Free State's five percentage point improvement in its compliance with the audit pass rate, this can be attributed to only one landfill site passing the audit in 2025 (Sasolburg – Vaalpark waste transfer facility) out of a total of 22 sites that were audited, while none of the sites passed the audit in 2024. This still makes the Free State the province with the lowest proportion of sites that passed the audit in 2025. The average compliance score of 18% is the worst average performance after that of the Northern Cape (13%).
- Similarly, the Northern Cape's audit pass rate improved from 0 to 8%, thanks to two

landfill sites passing the audit (Orania and Jan Kempdorp), out of a total of 25 sites audited, while no sites in the province passed the audit in 2024. This makes the Northern Cape the province with the third lowest proportion of sites passing the audit. The average compliance score remained unchanged at 13% – the worst average performance of any province.

- Limpopo’s compliance to the audit pass rate remains unchanged at 7% and the province ranks second worst after the Free State. The Tzaneen municipal landfill site is the only site in

this province that managed to pass the audit, out of a total of 14 sites audited. The average compliance score showed a slight improvement from 40% to 41%.

- Although North West’s average compliance score improved somewhat from 30% to 36%, the province’s compliance with the audit pass rate dropped from 17% to 14%.
- The provinces’ performance against the above two measures is summarised in the table below:

Table 2: List of provinces’ performance in 2025

Percentage landfill sites with 80% or more compliance			Average compliance score (%)		
Rank	Province	Score (%)	Rank	Province	Score (%)
1	Gauteng	56	1	Gauteng	84
2	Western Cape	51	2	Western Cape	66
3	Eastern Cape	38	3	Eastern Cape	61
4	KwaZulu-Natal	20	4	KwaZulu-Natal	46
5	North West	14	5	Limpopo	41
6	Mpumalanga	9	6	Mpumalanga	40
7	Northern Cape	8	7	North West	36
8	Limpopo	7	8	Free State	18
9	Free State	5	9	Northern Cape	13



A new landfill cell lined with a membrane to prevent contaminated leachate from the landfill from contaminating the soil and groundwater, under construction at the Felophepa municipal landfill site in Potchefstroom, North West.



A working weighbridge and access control at the Malmesbury Highlands municipal landfill site in the Western Cape – one of only a few sites that can boast a 100% compliance rate in 2025.

Discussion

The objective of AfriForum's landfill site is to determine whether municipal landfill sites meet the *minimum* requirements for responsible waste management. It only looks at the core aspects of a landfill site's design and management, which aims to limit harmful pollution and dangers that may impact the public's health and safety. Landfill sites' compliance with 80% or more of the audit requirements is therefore not supposed to be an unattainable goal, but rather serves as a non-negotiable standard that must be met.

When the 2025 audit results are viewed from this perspective, the only obvious conclusion that can be drawn is deeply concerning: Gauteng and the Western Cape are the only two provinces where the majority of landfill sites have passed the audit. Furthermore, Gauteng is the only province where the average compliance score is higher than the audit pass rate of 80%.

There is no clear "winner" for the worst performing province. KwaZulu-Natal, Limpopo, Mpumalanga, North West, the Northern Cape and the Free State are all strong contenders for the title. Although the

Eastern Cape, which ranks third, has shown good improvement and performed significantly better than the combined worst performers, the result still does not deserve much praise.

The 2025 audit results are summarised in the finding that only 22% of landfill sites audited in 2025 were able to achieve the 80% pass rate. The most common shortcomings observed during the audits which lead to landfill sites' overall poor performance include the following:

- Information such as the landfill site's permit or license is not readily available to the public.
- There is an absolute lack of access control, safety and security.
- No load inspections are done.
- Unauthorised types of waste are dumped.
- Dumping fees are not collected.
- Critical infrastructure, such as weighbridges, is out of order.

- Roads are not maintained.
- Machinery to handle waste is absent or out of order.
- Waste is not compacted or covered with soil.
- Fires occur at landfill sites.
- Staff is absent.
- Informal recyclers reside at most landfill sites, work within operational areas of the site, don't wear protective clothing and are not registered with the municipality.

An observation that stemmed from the experience of the project participants, but which is not directly reflected in the 2025 audit results, is the fact that participants had trouble giving comprehensive answers about the landfill sites' designed capacity, rate of dumping, remaining airspace, and the activities of informal recyclers at the sites. This is because most municipal landfill sites do not keep records of the volume and type of waste dumped there and municipal officials were either not present to answer the questions, or were not able to supply the necessary information.

The lack of this information is further evidence that municipal landfill sites are not being managed effectively.

A similar observation that is also not directly apparent from the 2025 audit results is that several participants were denied access to certain municipal landfill sites by the municipalities concerned, despite the fact that the DFFE's Director General for Waste Management confirmed her support for AfriForum's landfill site audit project in the spirit of cooperation. The municipalities that refused AfriForum access argued that they already conduct all legally required audits in terms of which compliance with their license conditions is tested, and that there is therefore no reason to participate in AfriForum's audit. In contrast to the alleged compliance with legal provisions behind which these municipalities hide, this lack of transparency and the rejection of an invitation to cooperate, raise suspicions about whether these municipalities have the interests of their communities at heart.

AfriForum's findings indicate major operational defects in municipalities regarding the systems and personnel responsible for proper waste

Information such as the permit number, business hours and dumping tariffs are clearly displayed at the entrance to the Hartbeesfontein municipal landfill site in Brits, North West – one of only three out of 21 landfill sites in this province that passed the audit in 2025.



management. The consequences of inadequate landfill site management include the following:

- Pollution of the environment:
 - Contaminated leachate that is not properly managed can contaminate the soil, groundwater and surface water. Smoke from uncontrolled fires and the release of methane gas can pollute the air.
- Public health risks:
 - The public can be exposed to toxic substances if hazardous waste is not handled properly. Waste that is not properly managed creates a breeding ground for flies and rats that can transmit diseases.
- Loss of confidence:
 - The public loses trust in municipalities' abilities, which leads to illegal dumping.

A further consequence of inadequate landfill site management is that many municipalities no longer exercise any control over landfill sites, meaning there is basically lawlessness on these sites. Although municipalities still bear the legal responsibility for sites, the void left as a result of

municipalities' poor management is in practice filled by informal recyclers.

Although AfriForum suggests that informal recycling has a role to play in South Africa's broad waste management system, it must still take place within the framework of the law. For example, municipalities must ensure that informal recycling takes place in a controlled manner in terms of a guideline issued by the DFFE in 2020. Due to the major health and safety risks that an operational landfill site poses for informal recyclers themselves, the guidelines stipulate, among other things, that:

- Informal recyclers must be registered before they will be allowed to work on a landfill site.
- Informal recyclers must receive workplace safety training and be equipped with protective clothing.
- Informal recyclers are only allowed to operate in a demarcated sorting area – not in the operational area of the landfill site.
- Informal recyclers' activities must comply with the relevant waste management legislation.

In the majority of cases (with the exception of private landfill sites) this however seems not to be the case.





AfriForum's Centurion branch has a sorting facility where recycling is done.

Next steps

Immediate action plan

Given the 2025 audit results, AfriForum's action plan will be implemented immediately to promote compliance with the audit requirements and ultimately landfill site management.

1. The publication of AfriForum's landfill site audit results forms part of its role as a civil rights watchdog and increases the transparency of the municipality's waste services. It thereby arms the public with knowledge about the state of local waste management, which equips them for participation in democratic processes.
2. The annual landfill site audit is the continuation of a comprehensive performance record or paper trail regarding each landfill site that is audited.
3. Following the audit process, a letter is sent to the municipalities concerned addressing their non-compliance. A comprehensive action plan is required from the municipalities, in which they must indicate how and by what dates they will rectify the issues of non-compliance.
4. AfriForum branches must participate in the public participation process of municipalities' integrated development plan (**IDP**) to ensure that the paper trail with regards to waste management issues is as complete and thorough as possible. The IDP process provides the opportunity to ensure that the municipalities concerned, budget adequately in their upcoming financial year to meet the community's waste management needs.
5. If evidence of environmental pollution exists arising from the audit's non-compliance findings and municipalities still fail to resolve the issues despite it being pointed out to them, there is the possibility that criminal charges may be laid against the responsible municipal officials.
6. The 2025 landfill site audit report will be handed to the DFFE's director-general for waste management for further discussion and cooperation.

Sustainable solutions

The crisis unfolding at South Africa's landfill sites is essentially a result of poor management. Waste management is a service that must be delivered



With a compliance score of 0%, the Hartswater municipal landfill site in the Northern Cape is the epitome of irresponsible landfill site management: There is no access control, the waste being dumped is not inspected, and the illegal dumping of tyres and carcasses has been observed. There is no working machinery or personnel present to implement an operational plan, which means waste is not compacted or covered with soil; waste and smoke from burning waste is blown by the wind into neighbouring residential areas, and the site is occupied by informal recyclers.

by municipalities according to South Africa's Constitution. Municipalities are failing miserably in this task due to mismanagement and a lack of accountability for officials failing to fulfil their obligations. This mismanagement includes the appointment of incompetent staff, misappropriation of funds, neglect of infrastructure and a lack of continuous monitoring to take early preventive steps.

Therefore, AfriForum believes that the sustainable improvement of landfill site management will be determined by the following:

- The strict enforcement of legislation on all landfill sites – municipal and private – to ensure accountability for non-compliance and in order for remedial steps to be taken in a timely manner.
- The development of incentive mechanisms to divert recyclable waste away from landfill sites, in order for remaining landfill site space to be optimally utilised, and because the transporting of waste over long distances is not cost-effective.
- Acknowledging the needs of communities

where inadequate municipal waste management is concerned, because on the one hand inefficient service delivery contributes to illegal dumping, and on the other hand it unfairly financially penalises law-abiding citizens who make use of alternative paid services.

- Prioritising workable public/private partnerships to utilise municipalities' limited resources more effectively.

AfriForum believes that *cooperation* and *community self-reliance* could be the key mechanisms that will determine the success of these solutions.

Cooperation

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

Without reinventing the wheel, the private service providers' experience, expertise and proven track record of compliance with legal requirements can help to effectively operate and manage landfill sites.

This frees up municipalities' limited resources, while

providing better and more cost-effective services to the public. Municipalities will continue to act as regulators to ensure that legal requirements are met. Through fines and incentive mechanisms, municipalities can ensure that private service providers operate landfill sites optimally.

The preferred mechanism for this is a public/private partnership (**PPP**). A PPP is a long-term agreement between a government agency such as a municipality, and a private entity, which in most cases is a registered company. The objective of PPPs is to share the financial and operational risks between state institutions and the private sector, while both benefit from it.

Community self-reliance

AfriForum strives for and is committed to the pursuit of government-independent solutions and the privatisation of waste collection services and landfill site management, because communities are increasingly having to pay for these services which are not rendered. AfriForum plays an increasingly important role in enabling communities to protect

themselves from poor public service delivery.

This is achieved by finding proactive solutions to the extraordinary challenges we face around the sustainable management of waste.

For example, AfriForum has already established its own waste removal service in Bloemfontein, which has been providing a sustainable service to residents since 2021 and recently received a boost with the acquisition of its own garbage truck to remove even more garbage.

Recycling projects initiated by AfriForum branches in their local communities, and at schools and businesses, play an important role in reducing the amount of waste that ends up on landfill sites. A two-pronged strategy whereby sorting of recyclable materials is undertaken at the source (for example by households) as well as at the recycling site, helps to alleviate the serious existing pressure on municipal landfill sites in particular. Furthermore, AfriForum is busy developing a private recycling service, which has already achieved great success in Groenkloof and Centurion in Pretoria.



Summary

With only 22% of landfill sites meeting 80% or more of the audit requirements in 2025, AfriForum's audit results once again confirm that South Africa is facing a landfill site crisis – a crisis that speaks of poor municipal governance.

The same concerning findings are made year after year, and numerous discussions are held with the municipalities concerned and the DFFE to discuss better cooperation, identify challenges and solutions, and to fix landfill sites. Yet this bears little fruit. Unfortunately, the reality is that most municipalities do not have the will and/or knowledge to manage landfill sites.

The poor management of municipal landfill sites has already had serious implications in Gauteng, where, on average, the 13 active municipal landfill

sites of the three metros (Johannesburg, Tshwane and Ekurhuleni) will reach their maximum capacity in just under four years. If these problems are not addressed urgently, it could lead to a complete collapse of waste management.

AfriForum will continue unceasingly to monitor landfill sites and put pressure on municipalities in order to bring about better landfill site management. Alternatives for proper waste management in South Africa are also being explored and AfriForum believes that the key to sustainable solutions lies in working with communities and promoting community self-reliance. AfriForum's successful refuse removal service in Bloemfontein and recycling service in Pretoria serve as proof that these extraordinary challenges can be solved in a sustainable manner.



An accessible waste transfer facility, such as this one in Mossel Bay in the Western Cape, can help to discourage the illegal dumping of waste.

Addendum A: Audit scores of every landfill site audited

Key:

Landfill site with permit	
Landfill site without permit	
Private landfill site	
Waste transfer facility	

Table 3: Landfill site compliance scores per province for the period 2021–2025

EASTERN CAPE							
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				2025
			2021	2022	2023	2024	
Aliwal North (Maletswai) ¹	Maletswai LM	12/9/11/P131	56	26	-	16	-
Cradock (Nxuba)	Inxuba Yethemba LM	B33/2/1000/33/P122	10	32	52	90	86
Elliot	Sakhisizwe LM	-	0	0	22	2	-
Hankey	Kouga LM	BB33/2/1100/5/P209	42	30	20	44	42
Humansdorp	Kouga LM	12/9/17/P53	68	-	74	72	80
Port Elizabeth (Gqeberha) – Arlington	Nelson Mandela Bay Metro	16/2/7/M200/D 1/21/P278	62	78	98	76	48
Uitenhage (Kariega) – Gillespie Street waste transfer facility	Nelson Mandela Bay Metro	12/9/11/L92/1	-	-	-	28	46
Uitenhage (Kariega) – Hillwacht waste transfer facility	Nelson Mandela Bay Metro	-	-	-	-	2	44
Uitenhage (Kariega) – Koedoeskloof	Nelson Mandela Bay Metro	B33/22/1200/7/P37	36	38	80	48	-
Uitenhage (Kariega) – Rosedale waste transfer facility	Nelson Mandela Bay Metro	-	-	-	-	-	40
East London – Roundhill	Buffalo City Metro	-	-	-	64	84	100
Number of sites audited			7	6	7	10	8
Number of sites that complied			0	0	2	2	3
Number of sites that did not comply			7	6	5	8	5
Total score			274	204	410	462	486
Average compliance (%)			39,1	34,0	58,6	46,2	60,8
Notes:			1. Site should have been closed; capacity already exceeded.				

FREE STATE							
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2021	2022	2023	2024	2025
Allanridge	Matjhabeng LM	-	4	0	16	4	-
Bethlehem	Dihlabeng LM	12/9/11/L98/2 & WM-L/1B/03/2010	32	18	28	22	44
Bloemfontein North	Mangaung Metro	16/2/7/C522/D1/Z2/P478	22	12	32	18	18
Bloemfontein South	Mangaung Metro	B33/2/350/2/P162	28	28	30	18	30
Boshof	Tokologo LM	WML/BAR/11/2014	14	20	30	4	12
Bothaville	Nala LM	16/2/7/C604/D1/Z1/P340	4	10	4	6	4
Brandfort	Masilonyana LM	-	34	12	14	14	-
Bultfontein	Tswelopele LM	WML/BAR/07/2014	28	24	28	20	24
Dealesville	Tokologo LM	12/9/11/L886/2	38	24	24	4	12
Deneysville	Metsimaholo LM	-	-	-	4	2	2
Frankfort	Mafube LM	16/2/7/E304/C11/Z1/P342	0	0	0	6	8
Harrismith	Maluti-A-Phofung LM	16/2/7/C801/D2/Z1/P333 & 16/2/7/C801/D2/Z2/P343	24	24	22	4	6
Heilbron	Ngwathe LM	-	2	0	2	4	8
Hennenman	Matjhabeng LM	-	0	0	8	2	0
Hertzogville	Tokologo LM	-	-	-	-	14	38
Kroonstad	Moghaka LM	B33/2/360/1/P36	14	16	20	42	18
Odendaalsrus	Matjhabeng LM	B33/2/325/6/P108	52	20	50	14	-
Parys	Ngwathe LM	16/2/7/C233/D1/Z1/P336	10	20	6	10	8
Reitz	Nketoana LM	16/2/7/C805/D4/Z2/P341	14	14	8	0	4
Sasolburg	Metsimaholo LM	12/9/11/L1905Z215440712	14	20	12	12	12
Sasolburg – Vaalpark waste transfer facility	Metsimaholo LM	-	-	-	78	72	86
Senekal	Setsoto LM	B33/2/340/16/P221	18	14	22	8	6
Steynsrus	Moghaka LM	B33/2/340/88/P112	10	8	22	Site too dangerous	42
Theunissen	Masilonyana LM	16/2/7/C402/D3/Z1/P339	12	4	14	10	-
Viljoenskroon	Moghaka LM	-	-	4	8	16	4

FREE STATE						
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)			
			2021	2022	2023	2024
Welkom	Matjhabeng LM	B33/2/340/32/P85	48	36	14	8
Winburg	Masilonyana LM	B33/2/340/20/P48	32	6	4	-
Zastron	Mohokare LM	-	-	-	0	0

Number of sites audited	23	24	27	27	22
Number of sites that complied	0	0	0	0	1
Number of sites that did not comply	23	24	27	27	21
Total score	454	334	500	364	394
Average compliance (%)	19,7	13,9	18,5	13,5	17,9

GAUTENG						
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)			
			2021	2022	2023	2024
Alberton – Platkop	Ekurhuleni Metro	33/2/2/321/1450	96	100	Denied entry	98
Boksburg – Rooikraal	Ekurhuleni Metro	16/2/7/c221/D24/21/P512	Under construction	Under construction	Denied entry	Closed during visit
Brakpan – Weltevreden	Ekurhuleni Metro	B33/2/321/172/P137	94	94	Site too dangerous	74
Bronkhorstspuit	Tshwane Metro	B33/2/220/116	64	82	70	74
Carletonville	Merafong City LM	16/2/7/C231/D004/Z1/P415	94	80	78	88
Fochville waste transfer facility	Merafong City LM	-	-	-	-	-
Ga-Rankuwa	Tshwane Metro	16/2/7/A230/D9/Z3/P489	72	72	59	66
Germiston – Simmer & Jack	Ekurhuleni Metro	B33/2/0322/494/P223	94	94	Denied entry	80
Kempton Park – Chloorkop	Ekurhuleni Metro	-	Rehabilitated	Rehabilitated	Rehabilitated	Rehabilitated
Krugersdorp – Luipaardsvlei	Mogale City LM	Gaut 002/10-11/VW0054 & Gaut 006/12-13/VW0005	-	-	72	90
Meyerton	Midvaal LM ¹	002/12-13/VW0001	98	92	-	82
Pretoria – Bon Accord	The Waste Group	B33/2/123/154/P191	86	92	86	94
Pretoria – Hatherley	Tshwane Metro	B33/2/123/88/P215	84	70	41	68
Pretoria – Mooiplaats	The Waste Group	16/2/7/A230/154/21/p311	98	98	94	98

GAUTENG							
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2021	2022	2023	2024	2025
Pretoria – Onderstepoort	Tshwane Metro	B33/2/1237/P6	Closed	Closed	Rehabilitated	Rehabilitated	Rehabilitated
Randfontein	Rand West City LM	B33/2/323/34/P12 & 12/9/11/L68331/3	4	4	16	64	-
Roodepoort	Johannesburg Metro	16/2/7/C221/D11/Z3/P65 & B33/2/121/53/P65	Closed during visit	86	84	78	-
Soshanguve	Tshwane Metro	B33/2/123/101/P43	94	94	74	66	72
Springs – Rietfontein	Ekurhuleni Metro	16/2/7/C221/D494/P275	Under construction	94	Denied entry	Closed during visit	96
Vanderbijlpark – Boitshepi	Emfuleni LM	006/15-16/W0005-	12	34	18	Closed	Closed
Vereeniging – Waldrift	Emfuleni LM	006/15-16/W0004	24	34	Closed	Closed	Closed
Westonaria – Libanon	Rand West City LM	16/2/7/C231/D21/Z	18	30	Closed during visit	42	-
Number of sites audited			15	17	11	15	9
Number of sites that complied			9	11	3	7	5
Number of sites that did not comply			6	6	8	8	4
Total score			1032	1250	692	1162	756
Average compliance (%)			68,8	73,5	62,9	77,5	84,0
Notes:			1. The Midvaal LM currently does not have any operational municipal landfill sites.				

KWAZULU-NATAL							
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2021	2022	2023	2024	2025
Amanzimtoti (eManzimtoti) – Seadoone waste transfer facility	eThekweni Metro	-	-	-	76	60	98
Dundee – Glencoe	Endumeni LM	12/9/11/L51/4	-	-	74	72	72
Hluhluwe	Big 5 Hlabisa LM	-	12	-	28	30	14
Margate	Ray Nkonyeni LM	16/2/7/T402/DS/Z1/P26/A1	72	58	60	30	66
Newcastle ¹	Newcastle LM	B33/2/2010/8/P138	84	52	30	22	22
Paulpietersburg	eDumbe LM	-	10	8	26	16	30
Pongola	uPhongolo LM	DC26/WML/0001/2014	28	42	70	28	32
Richards Bay – Empangeni	uMhlathuze LM	B33/2/2112/006/P245	60	100	100	98	88
Utrecht ²	eMadlangeni LM	16/2/7/V301/D3/Z1/P258	30	16	36	34	28
Vryheid	AbaQulusi LM	-	2	0	0	32	10
Number of sites audited			8	7	10	10	10
Number of sites that complied			1	1	1	1	2
Number of sites that did not comply			7	6	9	9	8
Total score			298	276	500	422	460
Average compliance (%)			37,3	39,4	50,0	42,2	46,0
Notes:			1. Site has reached capacity, but it is still operational. 2. Site is closed, but it is still operational.				

LIMPOPO

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2021	2022	2023	2024	2025
Ellisras (Lephalale)	Lephalale LM	-	16	18	82	42	64
Groblerstad	Elias Motsoaledi LM	12/4/10-B/10M2	66	66	73	74	60
Hoedspruit (Maruleng)	Maruleng LM	12/9/11/L207/5	12	14	28	28	54
Marble Hall	Ephraim Mogale LM	16/2/7/B300/D58/Z1/P261	72	80	61	66	70
Messina (Musina)	Musina LM	12/4/10/8/B/8N4	-	66	20	78	78
Naboomspruit (Mookgophong)	Modimolle-Mookgophong LM	16/2/7/A600/D7/Z2/P399	12	28	24	8	0
Nylstroom (Modimolle)	Modimolle-Mookgophong LM	16/2/7/A600/D2/Z1/P380	4	6	22	4	0
Phalaborwa	Ba-Phalaborwa LM	16/2/7/B700/016/21/P276	64	72	60	18	6
Pietersburg (Polokwane)	Polokwane LM	16/2/7/A700/D3/Z2/P319	-	74	50	56	58
Potgietersrus (Mokopane)	Mogalakwena LM	16/2/7/A600/C27/Z3/A1	-	50	0	40	40
Roedtan	Modimolle-Mookgophong LM	16/2/7/A600/D23/Z1/P262	0	4	0	0	0
Thabazimbi	Thabazimbi LM	16/2/7/A240/D4/Z1/P345	4	4	17	14	0
Tzaneen	Greater Tzaneen LM	16/2/7/B800/D2/Z23/1/P501	100	88	90	88	82
Warmbad (Bela-Bela)	Bela-Bela LM	B33/2/123/3	36	30	68	42	56

Number of sites audited	11	14	14	14	14
Number of sites that complied	1	2	2	1	1
Number of sites that did not comply	10	12	12	13	13
Total score	386	600	595	558	568
Average compliance (%)	35,1	42,9	42,5	39,9	40,6

MPUMALANGA

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2021	2022	2023	2024	2025
Barberton	Mbombela LM	B33/2/10960/P131	70	48	50	56	54
Belfast (eMakhazeni)	Emakhazeni LM	12/9/11/P95	28	28	59	34	48
Bethal	Govan Mbeki LM	17/4/WL/MP/307/13/02	4	8	6	6	12
Carolina	Albert Luthuli LM	17/4/WL/MP/301/12/02	Closed	-	82	54	74
Delmas	Victor Khanye LM	B33/2/220/9/P218	38	22	15	56	36
Dullstroom	Emakhazeni LM	17/4/WL/MP/314/14/01	16	12	0	6	2
Ermelo	Msukaligwa LM	16/2/7/C112/D1/Z1/P427	10	8	19	12	30
Evander	Govan Mbeki LM	17/4/WL/MP/307/14/01	4	Site too dangerous	Closed	Closed	0
Hendrina waste transfer facility	Steve Tshwete LM	-	-	-	-	78	88
Kinross	Govan Mbeki LM	17/4/WL/MP/307/15/01	16	4	0	6	2
Leandra (Thuli Fakude)	Govan Mbeki LM	-	32	14	0	46	64
Lydenburg (Mashishing)	Thaba Chweu LM	12/9/11/L826/6	12	8	20	6	0
Machadodorp (eNtokozweni)	Emakhazeni LM	17/4/WL/MP/314/14/02	8	6	4	4	0
Middelburg	Steve Tshwete LM	16/2/7/B10/D33/Z1/P412	64	74	60	54	32
Middelburg – Dennesig waste transfer facility	Steve Tshwete LM	-	-	68	42	72	70
Morgenzon	Lekwa LM	17/4/WL/MP/307/15/03	0	2	0	0	0
Nelspruit (Mbombela)	Mbombela LM	12/9/11/P5 & 16/2/7/X205/D06/P130	90	72	64	70	68
Piet Retief (eMkhondo)	Mkhondo LM	-	38	48	22	36	66
Secunda	Govan Mbeki LM	17/4/WL/MP/307/13/01	26	4	8	10	40
Standerton	Lekwa LM	12/9/11/L109/6	18	12	14	26	60
Volkstrust	Dr. Pixley Ka Isaka Seme LM	B33/2/2030/12/P177	58	-	72	28	38
Witbank (eMalahleni)	Emalahleni LM	B33/2/210/32/P136	44	24	42	46	38
Witriver waste transfer facility	Mbombela LM	16N/2/7/x205/D06	60	76	24	94	86

Number of sites audited	20	19	21	22	23
Number of sites that complied	1	0	1	1	2
Number of sites that did not comply	19	19	20	21	21
Total score	636	538	603	800	908
Average compliance (%)	31,8	28,3	28,7	36,4	39,5

NORTHERN CAPE

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2021	2022	2023	2024	2025
Britstown	Emthanjeni LM	-	-	-	-	0	0
De Aar	Emthanjeni LM	-	-	-	-	0	6
Deben	Gamagara LM	-	-	-	-	-	2
Delporthoop	Dikgatlong LM	-	-	-	0	0	2
Douglas	Siyancuma LM	-	10	8	0	0	0
Griekwastad	Siyancuma LM	-	-	-	-	-	4
Hanover	Emthanjeni LM	-	-	-	-	0	0
Hartswater	Phokwane LM	-	42	20	6	6	0
Hopetown	Thembelihle LM	-	10	10	2	2	2
Jan Kempdorp	Phokwane LM	-	10	8	6	6	96
Kakamas	Kai !Garib LM	B33/2/450/24/S/P160	-	10	4	12	0
Kamieskroon	Kamiesberg LM	16/2/7/F300/D8/Z1/P347	8	26	4	20	0
Kathu	Gamagara LM	B33/2/4441/15/P116	12	18	48	24	4
Keimoes	Kai !Garib LM	-	2	2	0	0	0
Kimberley	Sol Plaatje LM	16/2/7/C901/D2/P265	70	32	36	36	54
Kuruman	Ga-Segonyana LM	B33/2/441/9/P128	34	38	42	60	-
Lennertsville	Kai !Garib LM	-	-	-	-	-	0
Orania	Orania Dorpsraad	NC/PIX/SIY/ORA/04/2016	82	90	76	76	82
Pampierstad	Phokwane LM	-	-	-	-	-	2
Postmasburg	Tsantsabane LM	-	Closed during visit	Closed during visit	-	2	2
Prieska	Siyathemba LM	16/2/7/D720/D1/Z1/P479	46	20	30	16	22
Springbok	Nama Khoi LM	16/2/7/F300/D9/Z1/P315	4	4	4	4	0
Strydenburg	Thembelihle LM	-	-	14	-	0	2
Upington	Dawid Kruiper LM	-	10	26	24	12	38
Warrenton	Magareng LM	12/9/11/P103	18	6	6	6	14
Williston	Karoo Hoogland LM	-	0	0	0	8	0

Number of sites audited	15	17	17	22	25
Number of sites that complied	1	1	0	0	2
Number of sites that did not comply	14	16	17	22	23
Total score	358	332	288	290	332
Average compliance (%)	23,9	19,5	16,9	13,2	13,3

NORTH WEST

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)			
			2021	2022	2023	2024
Bloemhof	Lekwa-Teemane LM	NWP/WM/DR4/2011/11	32	26	6	6
Brits – Hartbeesfontein	Madibeng LM	B33/2/0121/41/P81	16	58	84	88
Christiana	Lekwa-Teemane LM	NWP/WM/DR4/2011/09	22	16	4	6
Coligny	Ditsobotla LM	-	0	0	0	0
Delareville	Tswaing LM	B33/2/330/44/P219	28	30	26	4
Hartbeesfontein (Lethabong)	City of Matlosana LM	16/2/7/C241/D3/P456	-	22	10	16
Klerksdorp	City of Matlosana LM	16/2/7/C241/D4Z2/P514	36	68	64	64
Koster ¹	Kgetlengrivier LM	NWP/WM/BP5/2013/23	16	12	4	6
Lichtenburg	Ditsobotla LM	B33/2/330/3/P58	4	6	6	4
Mooiooi	Sibanye-Stillwater (Interwaste)	16/2/7/A210/C29/Z1/P379 NWP/WM/BP2/2016/06	80	88	90	96
Orkney waste transfer facility	City of Matlosana LM	12/9/11/P59	-	14	4	0
Ottosdal	Tswaing LM	NWP/WM/NM4/2012/11	40	36	16	8
Potchefstroom waste transfer facility	Tlokwe LM	-	10	28	84	84
Potchefstroom – Felophepa	Tlokwe LM	16/2/7/C231/D13/Z1/P	46	82	98	52
Rustenburg – Waterval	Rustenburg LM	NWP/WM/BP1/2011/02	86	82	92	100
Sannieshof	Tswaing LM	NWP/WM/NM4/2012/09	28	36	18	8
Schweizer-Reneke	Mamusa LM	"NWP/WM/DR6/2012/22 (Variation of WML NWP/ WM/DR6/2012/22)	16	22	20	20
Stella	Naledi LM	NWP/WM/DR1/2013/16	24	34	26	28
Swartruggens	Kgetlengrivier LM	-	0	2	4	2
Ventersdorp	JB Marks LM	-	6	0	0	12
Vryburg	Naledi LM	NWP/WM/DR1/2009/01	58	52	50	48
Wolmaransstad ²	Maquassi Hills LM	B33/2/330/19/P166	4	4	4	14
Zeerust	Ramotshere Moiloa LM	B33/2/130/7/P214	38	30	32	34

Number of sites audited	21	23	23	23	21
Number of sites that complied	2	3	5	4	3
Number of sites that did not comply	19	20	18	19	18
Total score	590	748	742	700	750
Average compliance (%)	28,1	32,5	32,3	30,4	35,7
Notes:	1 & 2. Need to be closed and rehabilitated.				

WESTERN CAPE

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)				
			2021	2022	2023	2024	2025
Albertinia	Hessequa LM	19/2/5/4/D5/1/WL0081/18 (Variation of WMLs 19/2/5/1/ D5/1/WL0057/14)	-	-	90	70	82
Ashton	Langeberg LM	19/2/5/2/B1/2/WL0152/18	-	-	-	-	16
Bellville	Cape Town Metro ¹	19/2/5/4/A5/6/WL0050/12 & B33/2/720/213/P201	96	90	Closed	Closed	Rehabilitated
Bitterfontein	Matzikama LM	19/2/5/4/F3/2/WL0005/18 (Variation of WML 19/2/5/1/ F3/2/WL0025/14)	30	20	22	6	20
Bredasdorp	Cape Agulhas LM	16/2/7/G501/D1/Z1/P329	42	36	30	62	82
Clanwilliam	Cederberg LM	19/2/5/4/F2/4/WL0007/18 (Variation of WMLs 19/2/5/1/ F2/4/WL0050/14)	-	-	30	52	78
De Doorns	Breede Valley LM	19/2/5/4/B2/3/WL0041/18 (Variation of WML 19/2/5/1/ B2/3/WL0026/14)	30	18	32	32	4
Gansbaai	Overstrand LM	16/2/7/G400/D24/21/P335	84	82	100	100	100
George – Gwaing	George LM	WL0683/4	44	-	48	48	84
Gordon's Bay waste transfer facility	Cape Town Metro	E13/2/10/1-A3/193- DWLT404/10	96	98	100	96	100
Gouritsmond	Hessequa LM	19/2/5/4/D5/4/WL0084/18	-	-	-	74	76
Heidelberg	Hessequa LM	-	-	-	-	56	64
Hermanus	Overstrand LM	16/2/7/G501/D3/Z3/P374	88	94	100	98	100
Jongensfontein	Hessequa LM	19/2/5/4/D5/18/WL0085/18	-	-	-	60	26
Klawer	Matzikama LM	19/2/5/4/F3/6/WL0042/19	26	20	-	6	0
Kleinmond waste transfer facility	Overstrand LM	16/2/7/G401/D21/Z2/P458	-	-	-	-	98
Knysna – Old Place	Knysna LM	19/2/5/4/D4/17/WL0205/19	-	-	-	12	4
Knysna – Sedgfield waste transfer facility	Knysna LM	19/2/5/1/D4/26/WL0058/12	-	-	-	22	42
Langebaan waste transfer facility	Saldanha Bay LM	19/2/5/1/F4/7/WL0043/15	-	92	100	100	100
Lutzville	Matzikama LM	19/2/5/4/F3/10/WL0006/18	12	14	16	0	10

WESTERN CAPE						
Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)			
			2021	2022	2023	2024
Malmesbury – Highlands	Swartland LM	19/2/5/4/F5/16/WL0030/18 (Variation of WMLs B33/2/720/132/P67)	98	92	96	100
Malmesbury – Chatsworth ²	Swartland LM	B33/2/900/3/5/P167	4	Closed	Closed	Closed
Malmesbury – Kalbaskraal waste transfer facility ³	Swartland LM	-	80	88	-	Closed
Montagu – Bessieskop ⁴	Langeberg LM	-	-	-	-	84
Mossel Bay – Great Brak	Mossel Bay LM	19/2/5/4/D6/17/WL0065/18 (Variation of WML19/2/5/1/D6/17/WL0084/14)	86	92	94	92
Mosselbaai – Sonskynvallei waste transfer facility	Mossel Bay LM	EG13/2/10/1 - D6/17 - DWLT 002/09	88	92	92	84
Nuwerus	Matzikama LM	19/2/5/4/F3/13/WL0033/18 (Variation of WMLs 19/2/5/1/F3/13/WL0118/12)	20	24	14	6
Oudtshoorn – Grootkop	Oudtshoorn LM	B33/2/900/3/5/P167	26	54	56	54
Paarl waste transfer facility	Drakenstein LM	-	-	-	98	96
Riversdale	Hessequa LM	19/2/5/4/E3/10/WL0088/18 (Variation of WMLs B33/2/800/106/S/P212)	86	86	90	40
Robertson waste transfer facility	Langeberg LM	B33/2/800/10/P20	-	-	-	-
Slangrivier	Hessequa LM	19/2/5/4/E3/10/WL0088/18	-	-	-	70
Stellenbosch	Stellenbosch LM	16/2/7/G203/D16/21/P331	96	94	96	88
Stilbaai	Hessequa LM	19/2/5/1/D/11/WL0060/14	88	Closed during visit	-	70
Swellendam	Swellendam LM	19/2/5/4/E3/2/WL0076/18 (Variation of WMLs B33/2/800/9/S/P171)	-	Denied entry	-	60
Vanrhynsdorp	Matzikama LM	19/2/5/4/F3/16/WL0044/18	38	30	10	10
Velddrif ⁵	Bergervier LM	19/2/5/1/F1/14/WL0071/13	44	44	-	Closed during visit
Vredenburg	Saldanha Bay LM	19/2/5/4/F4/23/WL0034/18 (Variation of WMLs 19/2/5/1/F4/23/WL0050/16)	-	-	94	100

WESTERN CAPE

Name of branch/landfill site	Municipality/responsible entity	Licence number	Compliance (%)			
			2021	2022	2023	2024
Vredendal ⁶	Matzikama LM	19/2/5/4/F3/17/WL0032/18	32	46	22	20
Wellington	Drakenstein LM	19/2/5/4/B3/39/WL0109/17 (Variation of WMLs E13/2/10/1-B3/36-WL0045/10)	66	62	98	100
Witsand	Hessequa LM	19/2/5/4/E3/10/WL0091/18	-	-	-	70
Worcester	Breede Valley LM	19/2/5/4/B2/32/WL0126/18 (Variation of WMLs B33/2/800/12/P70)	58	52	82	80

Number of sites audited	25	23	24	34	37
Number of sites that complied	11	11	14	12	19
Number of sites that did not comply	14	12	10	22	18
Total score	1 458	1420	1 610	2 034	2 458
Average compliance (%)	58,3	61,7	67,1	59,8	66,4
Notes:	1. Cape Town Metro's waste goes to, among others, the Vissershok landfill site. AfriForum is not allowed there, because hazardous waste is also handled at this site. 2. Since the closure of Chatsworth landfill site, waste has been diverted to the Highlands landfill site. 3. Since the closure of the Kalbaskraal waste transfer facility, waste has been diverted to the Highlands landfill site. 4. The Bessieskop landfill site should have closed back in 2013 after the site reached full capacity. 5. Since the closure of the Velddrif landfill site, waste has been diverted to the Vredenburg landfill site. 6. A new landfill site that will serve the region is currently under construction.				

Addendum B: Compliance and non-compliance with audit requirements

Table 4: Number of landfill sites, per province, that passed the audit (complied with 80% of the audit requirements)

Province	Landfill sites audited (number)					Complied (number of sites that complied with ≥ 80% of the minimum requirements)					Did not comply (number of sites that had < 80% compliance with the minimum requirements)				
	2021	2022	2023	2024	2025	2021	2022	2023	2024	2025	2021	2022	2023	2024	2025
Eastern Cape	7	6	7	10	8	0	0	2	2	3	7	6	5	8	5
Free State	23	24	27	27	22	0	0	0	0	1	23	24	27	27	21
Gauteng	15	17	11	15	9	9	11	3	7	5	6	6	8	8	4
KwaZulu-Natal	8	7	10	10	10	1	1	1	1	2	7	6	9	9	8
Limpopo	11	14	14	14	14	1	2	2	1	1	10	12	12	13	13
Mpumalanga	20	19	21	22	23	1	0	1	1	2	19	19	20	21	21
Northern Cape	15	17	17	22	25	1	1	0	0	2	14	16	17	22	23
North West	21	23	23	23	21	2	3	5	4	3	19	20	18	19	18
Western Cape	25	23	24	34	37	11	11	14	12	19	14	12	10	22	18
National total	145	150	154	177	169	26	29	28	28	38	119	121	126	149	131



**LANDFILL
SITE AUDIT**

2025