

MUNICIPAL LANDFILL AUDIT REPORT



by

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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 the vision of sustainable development and responsible waste management in South Africa with us.

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 rewarded 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.

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Introduction

The civil rights organisation AfriForum launched the #CleanSA initiative in May 2014. This project strives to make a positive change in the management of waste across South Africa by holding the officials involved accountable and by creating cooperation between communities and the three spheres of government: the Department of Forestry, Fisheries and the Environment (DFFE); the respective provincial departments on the provincial level; and municipalities on the local level of government. From a waste management perspective, the latter is the most important and is also the level of government that is closest to communities. With the #CleanSA initiative AfriForum wants to equip communities with solution-driven approaches. Therefore, we introduce the latest technologies and processes for dealing with the growing waste issue and for processing waste through lower levels of pollution and more efficient recycling.

This initiative gave rise to AfriForum's landfill site audit report. The aim of this audit is to establish the extent to which landfill sites (legal as well as illegal) in the municipalities of AfriForum's 160 branches across the country comply with the minimum requirements for compliance and to compare these with their waste management licences. With this project AfriForum wants to be known as a leader in waste management, as it is the only organisation that publishes this type of data on the status quo of South Africa's landfills. Factors

such as inadequate waste management; the collapse of infrastructure; corruption, health and safety issues; a shortage of air space for waste, as well as worldwide concerns about global warming and pollution have compelled AfriForum to implement this project to protect South Africans' constitutional rights and our natural environment. AfriForum is of the opinion that very few municipalities comply with waste regulations, and that local authorities display a lack of accountability for proper waste management, monitoring and licensing.

For the purpose of this report, waste management practices in specific municipalities were assessed to determine whether responsible management takes place





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

The facts

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

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).

The South African waste management strategy is based on a range of laws aimed at managing and preventing pollution of the environment. The most pertinent of these laws are the following:

- The Hazardous Substances Act 15 of 1973, which regulates the treatment and destruction of hazardous substances
- The National Environmental Management Act 107 of 1998
- The National Environmental Management:

Waste Act 59 of 2008, which was promulgated specifically to regulate waste management in South Africa.

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.

The current South African legislation to manage waste properly seems to be adequate. However, the appropriate legislation is neither applied nor enforced.

The government is obliged by the Constitution to uphold the rights 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 waste is reused, recirculated and recycled in an environmentally friendly manner, or treated and disposed of in a safe manner.

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”, or “rubbish tips”. 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 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 sites do not require a licence, but need to be visited by the local authorities regularly to ensure it does not have a negative environmental or health impact.

In terms of section 9(1) of the National Environmental Management: Waste Act 59 of 2008 a municipality must employ its executive powers to provide waste management services – including refuse removal and the storage and destruction of waste – in such a way that it does not conflict with national and/or provincial standards.

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

Waste is divided into two categories, 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



classification of hazardous waste also changed in 2013 (refer to GG 36784 R635 of 23 August 2013). Regulation 636 now refers to five types of waste. Type 0 cannot be dumped on landfill sites untreated. Type 1 can only be dumped on Class A terrains, Type 2 on Class B, Type 3 on Class 3 and Type 4 on Class D terrains. There are also now restrictions on the dumping of some waste materials, while others are prohibited completely on landfill sites.

PLEASE NOTE: This AfriForum audit report focuses only on municipal/private land fill sites for general waste. However, carcasses, sewage, medical waste and other types of hazardous waste were indeed found on some of the general land fill sites referred to in this report. It does however happen in some cases that small quantities of hazardous and medical waste are dumped legally on municipal sites, as it originates from households and finds its way into 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 that affect people's health or cause pollution. Local authorities can also be held civilly liable for associated financial costs, particularly relating to the closing or rehabilitation of landfill sites and the rehabilitation of polluted soil or land intended for urban development.

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

- the land fill sites are located close to where people live;
- the land fill sites are poorly designed and developed (for instance where leached or toxic water gets into the groundwater reservoirs and rivers);
- the land fill sites are poorly managed (for example if the sites are not fenced, access

The project

Various communities participated in the project by inspecting their local landfill sites and answering 33 questions (counting 25 points in total) about these sites. This contributed to the data used for the audit of compliance with the minimum requirements for landfill sites. They were accompanied by AfriForum's provincial coordinators and various other stakeholders, including municipal officials, the media and service providers.

The Director-General for Waste Management of the DFFE 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.

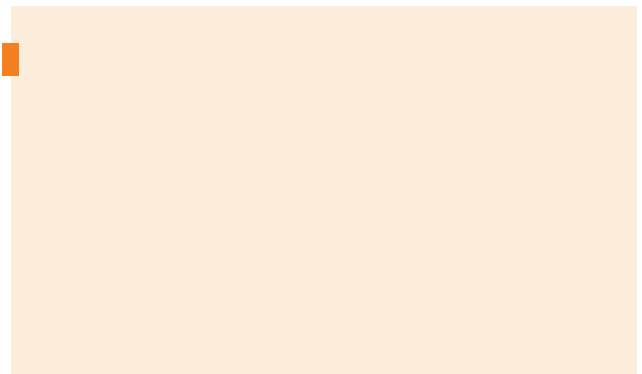
AfriForum took part in several discussions with organisations such as the CSIR and IWMSA who requested AfriForum to gather more data during the audit process, as there is no other data available apart from AfriForum's.

The extra data that was considered this year is as follows:

- How many 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 (preferably in m³)?
- How much of the intended capacity has been used to date?
- What is the offset rate at the site (tons per day)?
- What is the remaining life span of the site before closure (in years)?
- When was the last time the site was surveyed to determine the remaining capacity?

Almost every licensed landfill site is required to be audited annually by independent parties or organisations. With this project AfriForum is therefore well positioned as a community watchdog to conduct a reliable audit on the various local landfill sites.

Participants were encouraged to take photos as evidence



Results

AfriForum audits in previous years (as from 2014) at landfill sites all over South Africa were as follows:

- 2014: 83 sites
- 2015: 56 sites
- 2016: 83, of which 3 were in the private sector
- 2017: 105, of which 3 were in the private sector
- 2018: 114, of which 5 were in the private sector
- 2019: 127, of which 3 were in the private sector
- 2020: 135, of which 3 were in the private sector
- 2021: 153, of which 4 were in the private sector
- 2022: 162, of which 4 were in the private sector
- 2023: 161, of which 4 were in the private sector

The most remarkable observation was that various sites had closed down, while others that are still open should have been closed down, according to their licence conditions. It is worrisome that this has been the case

for two consecutive years. There is even one site that is still operational despite receiving a notice back in 2013 that it should close down.

The results of the landfill sites audited between 2014 and 2018 have been omitted from this year's report due to the size of the report, but can be supplied on request. The sites that were audited between 2019 and 2022 are included in this report in order to be compared with the 2023 results. The results can be summarised as follows:

Only 28 of the 161 landfill sites that were audited in 2023 (17,5%) complied with 80% or more of the minimum requirements for landfill sites. This means that 133 landfill sites within municipalities (82,5%) did not meet the minimum requirements. This clearly points to major shortcomings with respect to systems and people responsible for proper waste management across the entire country.

This also indicates somewhat of a decrease compared with 2022 of sites that complied with 80% or more of the minimum requirements. This is also concerning if one takes into account that the Minister of the DFFE have received the report, yet no steps have been taken against the relevant municipalities.

The number of landfill sites that were audited in each province is indicated in table 1 below, as well as the number that complied or did not comply with the minimum requirements for landfill sites.





The Hatherley landfill site, just outside Pretoria in Gauteng

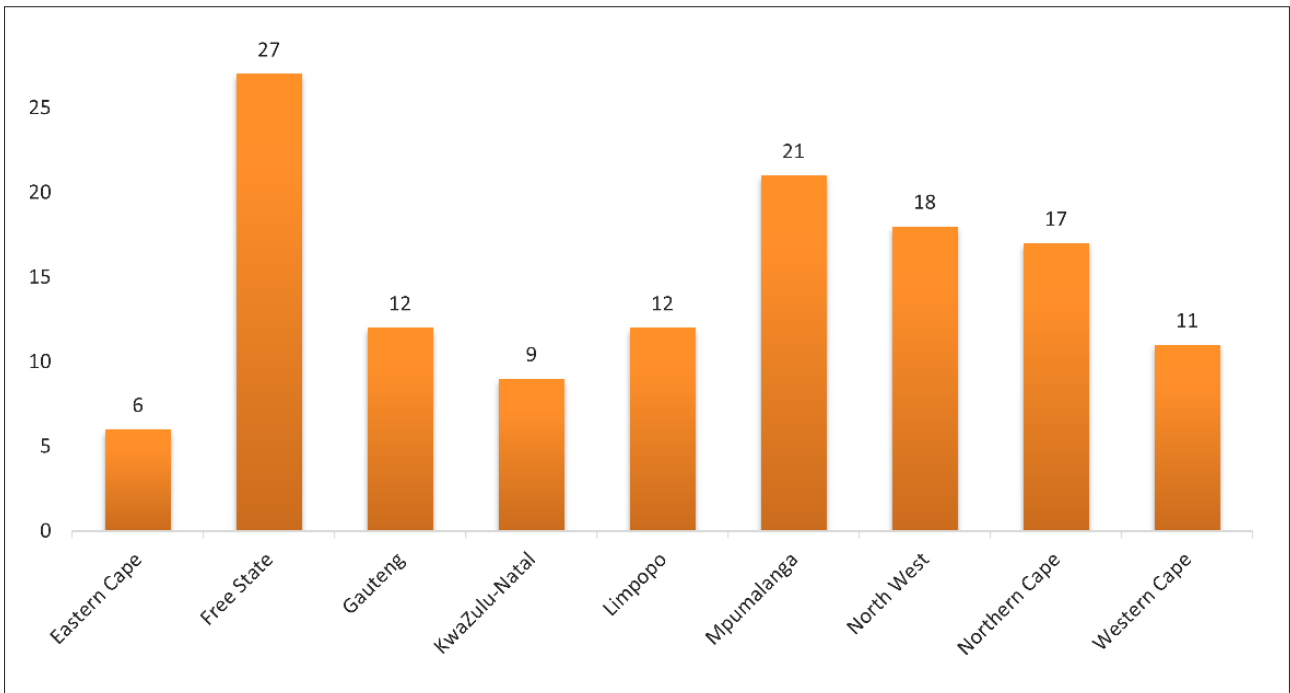


Figure 1: Number of audited landfill site per province not complying with minimum requirements in the 2023 report

The percentage of all audited landfill sites that complied with/did not comply with the minimum requirements for landfill sites in 2023 is shown in figure 2 below.

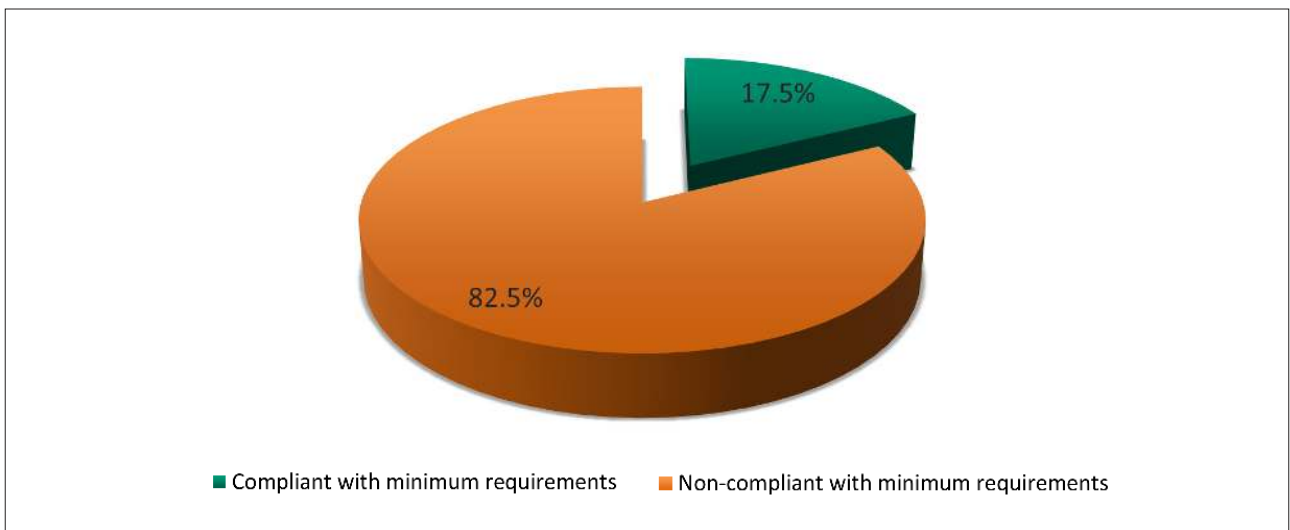


Figure 2: Percentage of audited landfill sites complying/not complying with minimum requirements in 2023

The audit results of 2014 to 2023 are compared in figure 3 below. It is not indicated in the graph whether the performance of landfill sites improved or deteriorated.

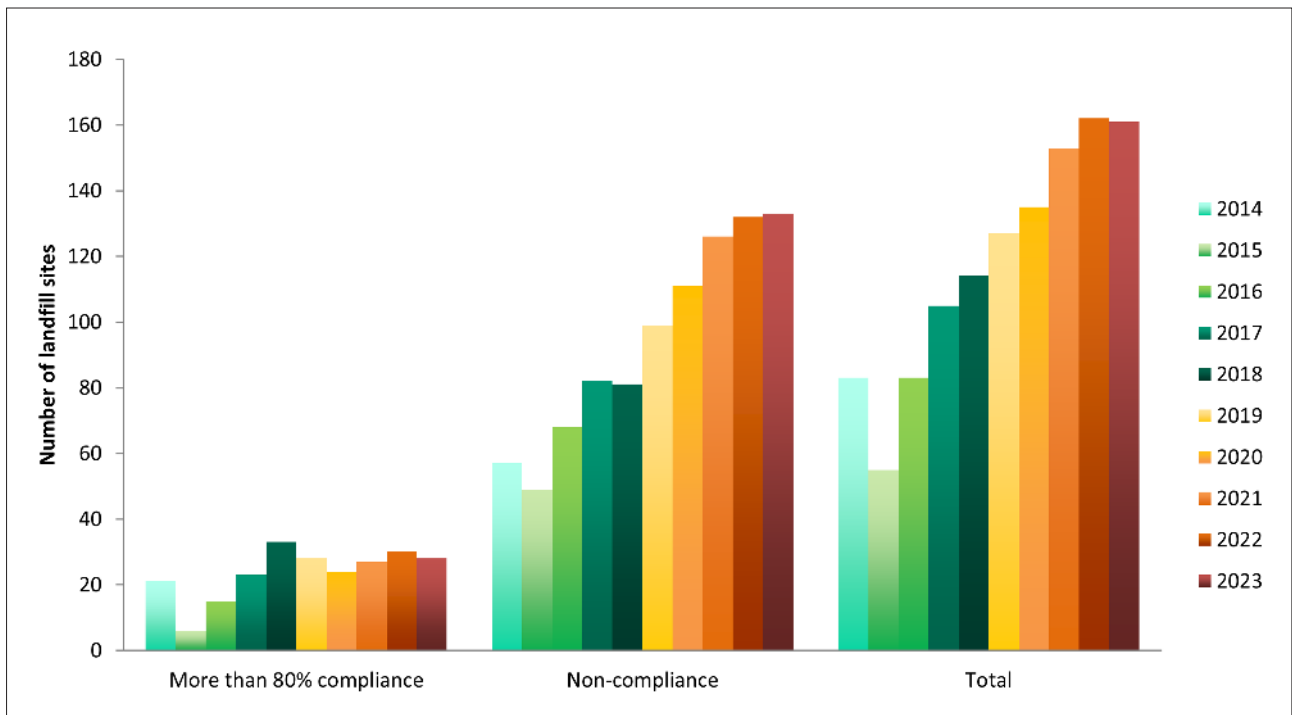
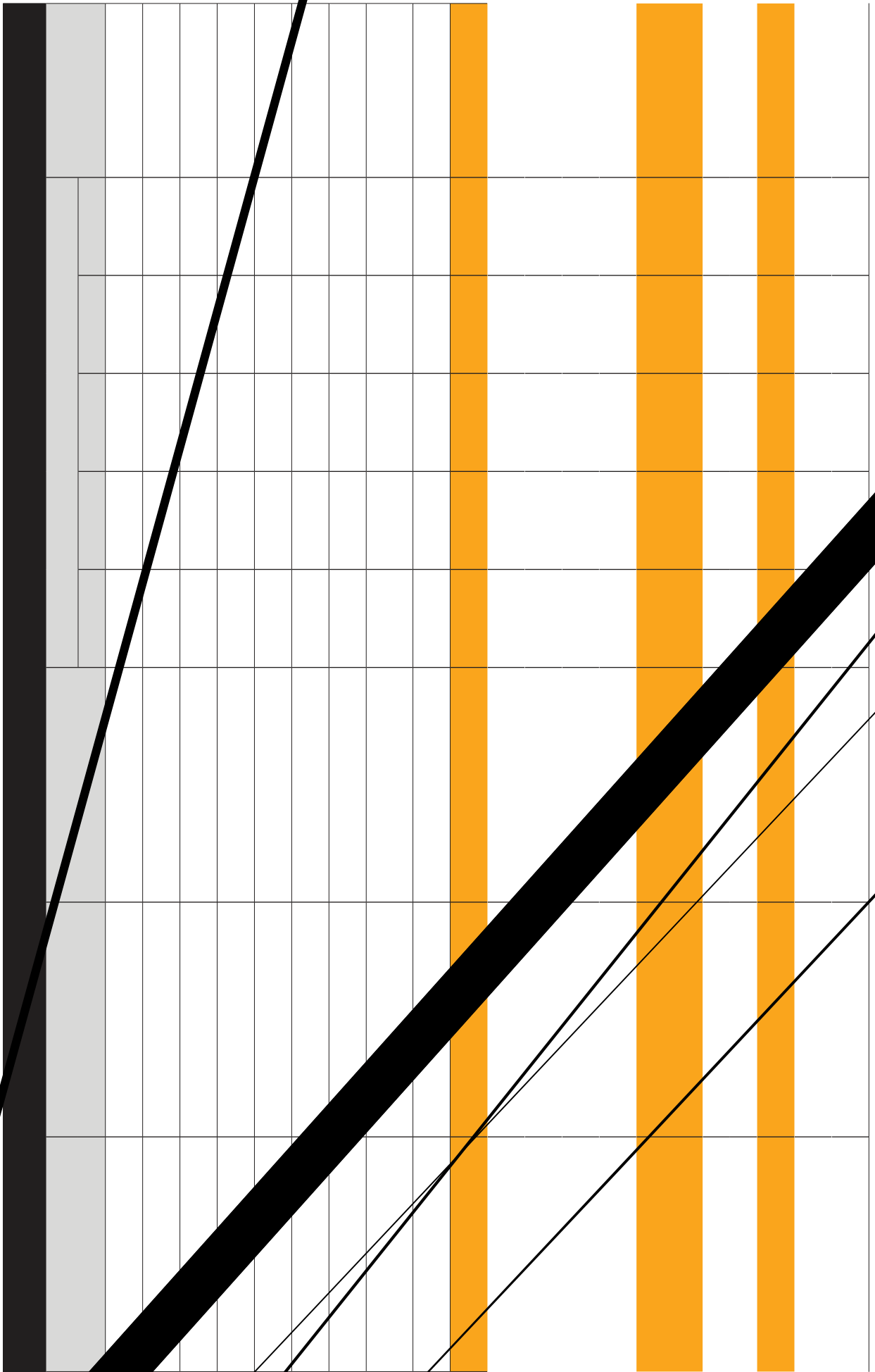


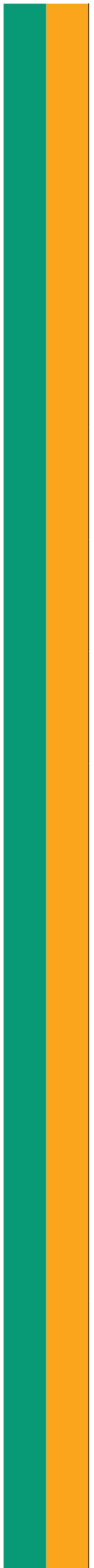
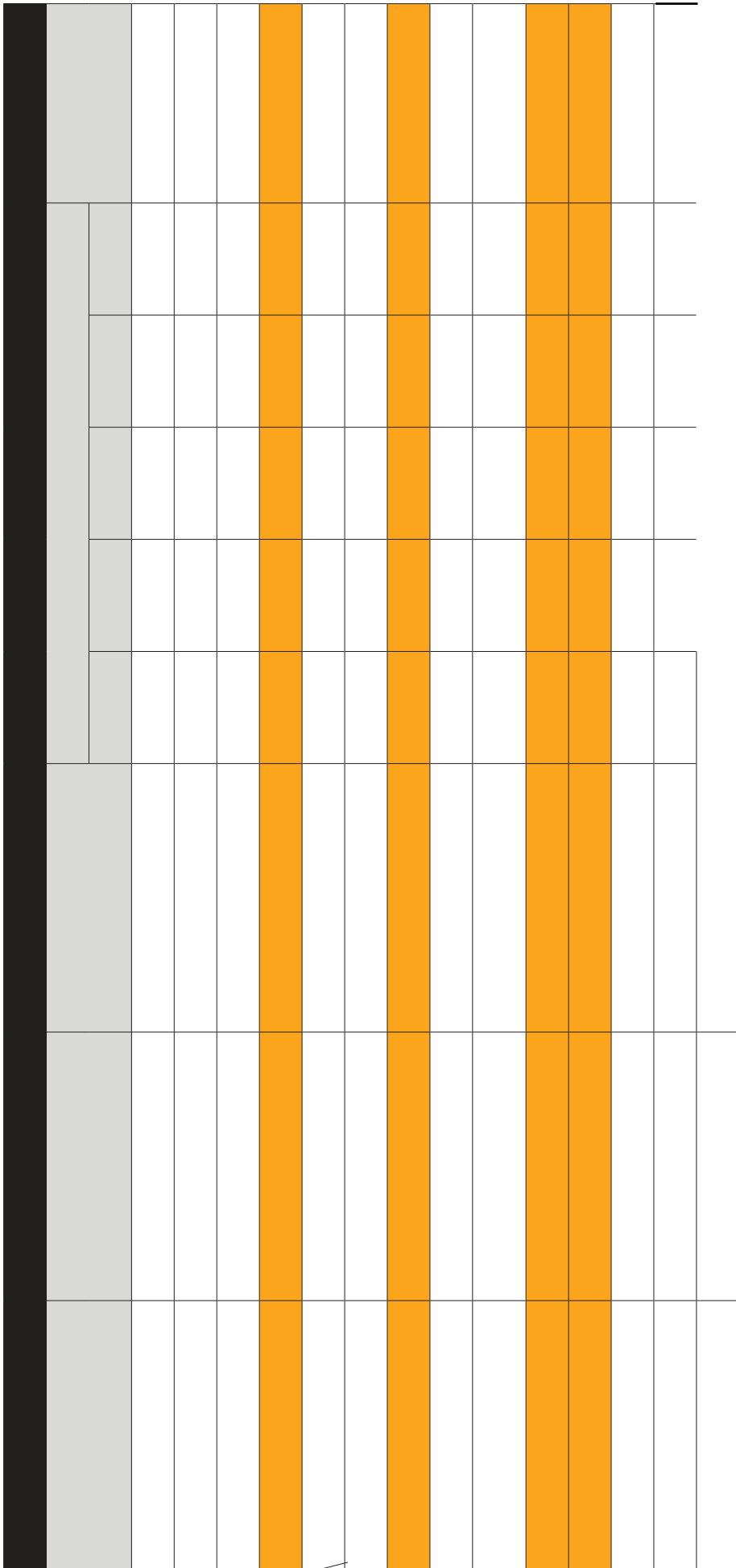
Figure 3: Comparison of number of audited landfill sites complying/not complying for 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023





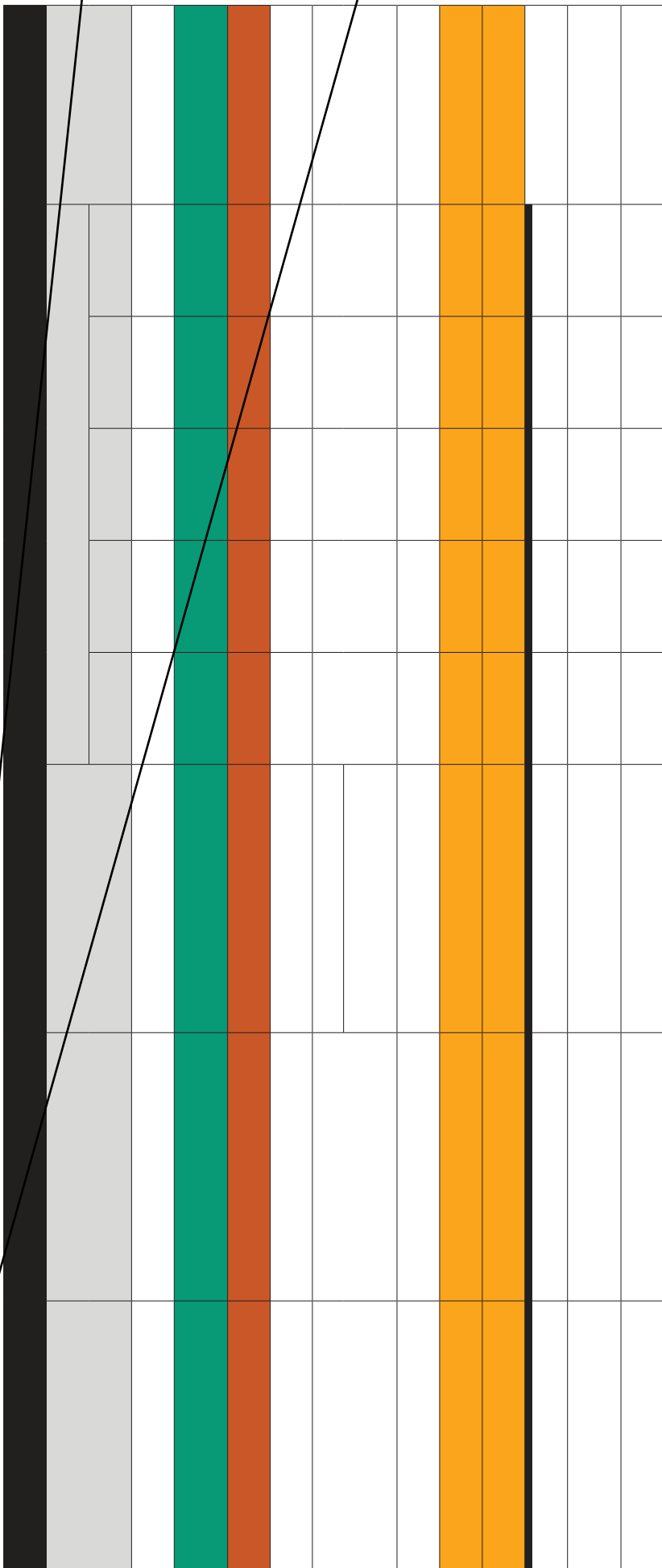
MPUMALANGA

Name of branch/landfill site	Municipality/Responsible entity	Licence number	Compliance (%)					Number of reclaimers
			2019	2020	2021	2022	2023	
Volksrust	Dr. Pixley Ka Seme LM	-	2	16	58	-	72	0-50
Witbank	Emalahleni LM	B33/2/210/32/P136	60	34	44	24	42	100-200
Witvriev waste transfer facility	Mbombela LM	16N/2/17/X205/D06	80	-	60	76	24	-



FREE STATE

Name of branch/landfill site	Municipality/Responsible entity	Licence number	Compliance (%)					Number of reclaimers
			2019	2020	2021	2022	2023	
Welkom	Matjhabeng LM	B33/2/340/32/P85	13	12	48	36	14	50-100
Winburg	Masilonyana LM	B33/2/340/20/P48	54	28	32	6	4	0-50
Zastron	Mohokare LM	-	-	-	-	-	0	0-50



KWAZULU-NATAL

Name of branch/landfill site	Municipality/Responsible entity	Licence number	Compliance (%)					Number of reclaimers
			2019	2020	2021	2022	2023	
Newcastle	Newcastle LM	B33/2/2010/8/P138	88	604	84	52	30, site capacity has been reached but it is still operational	-
Paulpietersburg	eDumbe LM	-	14	4	10	8	26	0-50

EASTERN CAPE

Name of branch/landfill site	Municipality/Responsible entity	Licence number	Compliance (%)					Number of reclaimers
			2019	2020	2021	2022	2023	
Humansdorp	Kouga LM	12/9/17/P53	58	88	68	-	74	100-200
Port Elizabeth (Arlington)	Nelson Mandela Bay Metro	16/2/7/M200/D1/21/P278	90	78	62	78	98	100-200
Uitenhage (Koedoeskloof)	Nelson Mandela Bay Metro	B33/22/1200/7/P37	90	74	36	38	80	100-200
East London (Roundhill)	Buffalo City Metro	-	-	-	-	-	64	200+

WESTERN CAPE

Name of branch/landfill site	Municipality/Responsible entity	Licence number	Compliance (%)				Number of reclaimers
			2019	2020	2021	2022	
Swellendam	Swellendam LM	19/2/5/4/E3/2/W/L0076/18 (Variation of WMLs ati	-	-	-	Denied entry	-

An average audit score was calculated for each province in which the landfill sites were audited between 2014 and 2023. The percentage allocated to each individual site in a particular province was aggregated and the total was then divided by the number of sites in that province.

Example:

In Mpumalanga, six landfill sites were audited in 2014, 2015 and 2016. Therefore:

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

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

The conclusion can therefore be made that the landfill sites in this province have improved by 1% in comparison with the previous year.

The average audit scores for each province for 2014 to 2023 are indicated in figure 4.

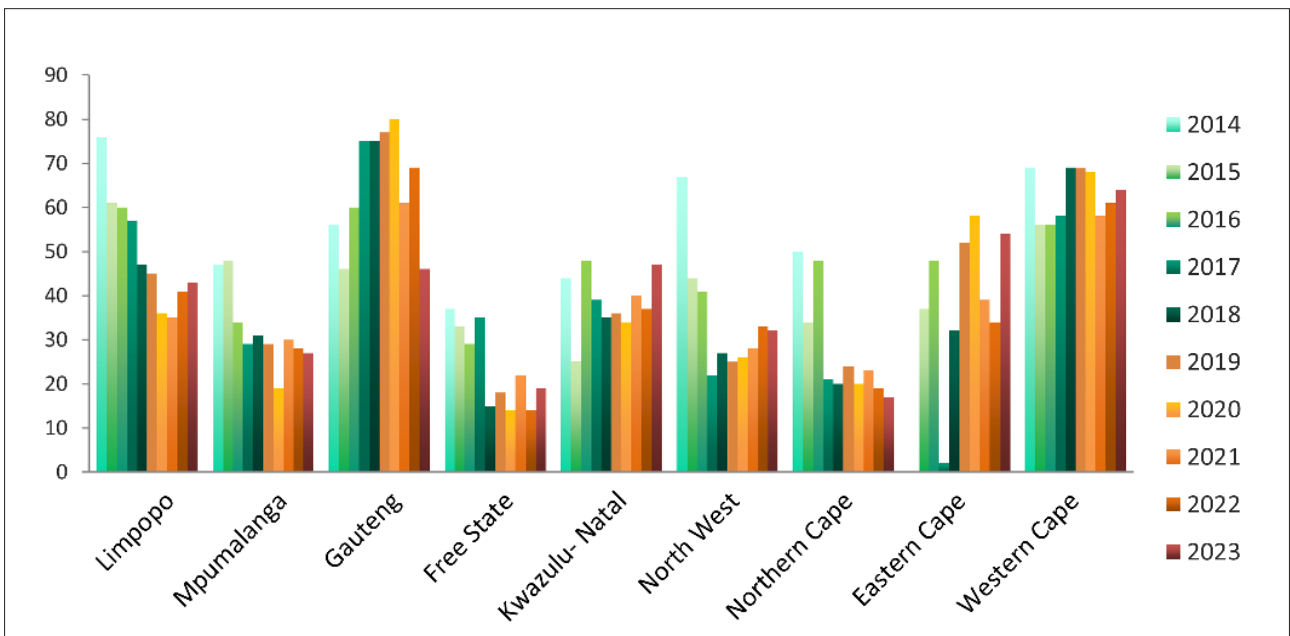


Figure 4: Average annual audit score (in percentages) for the period 2014 to 2023, per province

The percentage of compliance at national level for the period 2014 to 2023 is reflected in figure 5 below.

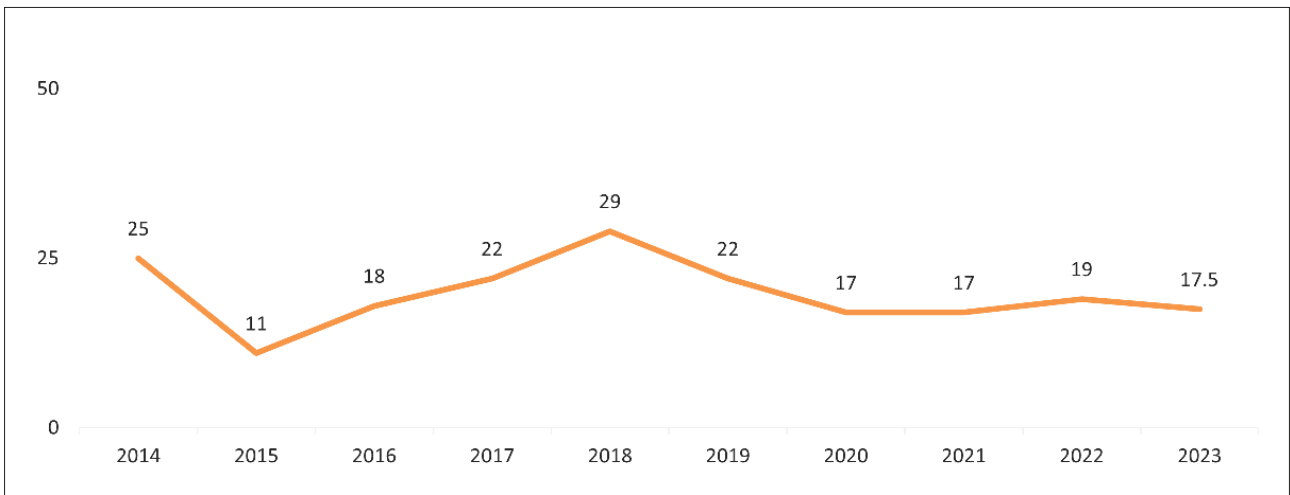


Figure 5: Average annual national compliance score (in percentages) for the period 2014–2023

Questionnaire

The questionnaire used for landfill site audits from 2017 to 2023 was revised and differs from the one used in 2014, 2015 and 2016. The 33 questions now cover all the minimum requirements¹ for a landfill site. Applicable legislation was also studied to determine the minimum requirements for transfer stations, and the audit can also be used for this purpose, where applicable.

The questionnaire was compiled to establish whether each landfill site complies with the minimum requirements for landfill sites as prescribed in the National Environmental Management: Waste Act 59 of 2008. To pass this audit, a landfill site has to comply with at least 80% of the minimum requirements and then strive to improve on the 20% non-compliance.

The coordinates were also added, because the sites' locations are not always set out clearly on the licences.

The challenge for the community is that each landfill site has a unique permit or licence with requirements that can be even stricter than the above-mentioned minimum requirements. Inadmissible waste in terms of the legislation can for example be permitted on certain conditions and requirements that have to be met by that particular landfill site. 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. AfriForum is aware that this forms part of the old classification system and that there is a new system. The old classification system was used for the purpose of this report because most, if not all, of the landfill sites were established before the new classification 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:

G:M:B



1. The minimum requirements for landfill sites (1998, second edition) that was published by the Department of Water Affairs and Forestry. Available at <http://sawic.environment.gov.za/documents/266.PDF>.

Table 3: Questionnaire

The complete questionnaire is available on request.

AfriForum took part in several discussions with organisations such as the CSIR and IWMSA who requested AfriForum to gather more data during the audit process, as there is no other data available apart from AfriForum's.

The extra data that was considered this year is as follows:

- Question 1: How many recyclers are on the site? 0, 1 to 50, 50 to 100, 100 to 200, 200 or more?
- Question 2: What is the intended capacity of the site (preferably in m³)?
- Question 3: How much of the intended

capacity has been used to date?

- Question 4: What is the remaining lifespan of the site before closure (in years)?
- Question 5: What is the offset rate at the site (tons per day)?
- Question 6: When was the last time the site was surveyed to determine the remaining capacity?

The table below was designed to show the data at the municipalities where it was available. The questions formed part of the larger audit and were asked at all the sites where the audit was done. It is concerning that very few sites had this data at their disposal, which is yet another indication that the municipalities do not have the capacity to do their job effectively.





The Waste Group Class B liner being completed at the Mooiplaats landfill site in Centurion, Gauteng

What has been achieved so far?

Liaison with national, provincial and local governments

In cooperation with the Minister of Forestry, Fisheries and the Environment and her team, AfriForum identified six sites at the end of 2020 that pose various challenges, with the aim of rehabilitating and restoring these through different models. It is an ongoing process and various meetings are held to address the challenges that these sites face.

These six sites are:

- Libanon land II site in Westonaria (Rand West City LM)
- Naboomspruit (Mookgophong LM)
- Thabazimbi (Thabazimbi LM)
- Frankfort (Mafube LM)
- Sasolburg (Metsimaholo LM)
- Potchefstroom (JB Marks LM)

During the last meeting between AfriForum and the national DFFE in May 2021 it was decided that these six sites were to be visited. Resulting from these visits, decisions would be made about the road ahead and possible alternatives for managing and getting these sites up to standard. AfriForum believes this could be

the answer to steer landfills in a new direction.

The first meetings were held with the respective municipalities at the end of 2021 and possible solutions were discussed. It was decided that AfriForum would compile a memorandum of understanding (MOU) and send it to the municipalities for discussion on improved cooperation. Unfortunately, the problem is that the municipalities have neither the will nor the knowledge to manage these sites.

It became clear in these meetings that there is insufficient communication between the national, provincial and municipal authorities. Only one meeting was held in 2022 and not much has come of it. At this stage the national government is just trying to keep a sinking boat afloat.



Court cases

AfriForum's Naboomspruit branch was involved in a landfill site court case, which was heard on 9 October 2017, but with the decision of the court pending. Judgment was eventually delivered in favour of AfriForum in a court case against the Lim 368 Local Municipality. Judgement was also delivered in favour of AfriForum in the Pretoria High Court on 7 February 2018, with costs, regarding the appalling way in which the Naboomspruit landfill site was managed.

The provincial DFFE in Limpopo has refused to have follow-up meetings with AfriForum and the national department. The provincial department is of the opinion that there are ongoing criminal prosecution cases. AfriForum does not find this satisfactory though, as the community still suffers the consequences on the site – these steps will not bring immediate relief. AfriForum is in the process of bringing an application of contempt against the municipality and the provincial government in 2023.

Challenges

The greatest challenge to solving the problems is a matter of will from the side of the different government spheres. It seems that the national government is eager to see improvement on local level, but provincial and local government spheres do not share this sentiment and/or do not have the competence to do so.

Another major challenge is that municipalities do not know that the new Municipal Infrastructure Grant (the so-called yellow fleet) can be utilised to fund landfill site infrastructure. 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.

A major concern is that money is not utilised correctly since municipalities are gripped by corruption. No responsibility is taken for corruption and there are no consequences. Subsequently, available funds are not spent correctly and effectively.

After meetings held at the end of 2021 with the respective national, provincial and municipal authorities, it was clear that there is hardly any communication between the departments.

Action plan

The 2023 results touched on various issues with municipalities across the country that are responsible for waste management.

Several municipalities that did not meet the minimum requirements in the period 2014–2023 also did not respond to the letters AfriForum sent to them regarding the mismanagement of the landfill sites under their control. Letters were once again sent to all the municipalities that did not comply with the minimum requirements in 2022. Some sites even deteriorated further since the 2022 audit took place. AfriForum will monitor the progress of these sites and will act more decisively to ensure compliance with the minimum requirements.

In 2022 AfriForum brought up the landfill site issue during the public participation process for the integrated development plan in the various municipalities. AfriForum branches also started compiling action lists and submitting these to municipal managers to address the landfill site issue. In this way, AfriForum wants to ensure that the municipalities concerned budget sufficiently in the coming financial year to meet the needs of the community with respect to landfill sites.

The 2023 report will be used as a constant against which to measure the same infrastructure in all the other AfriForum branches in 2024.

The process for ensuring compliance includes the following:

1. A comprehensive track record or paper trail was started to keep a record of specific sites.
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. Branch structures should participate in the integrated development plan to ensure that the paper trail is as comprehensive as possible.
4. Provincial departments are responsible for monitoring

landfill sites, enforcing the law and issuing licences for unlicensed landfill sites. AfriForum will continue to exert pressure on the provinces to carry out their duties.

5. Should municipalities fail to resolve the issues, legal action will be taken. It is possible to open a criminal case against the relevant administrative official.
6. AfriForum will also be obliged to rehabilitate





Alternative solutions for landfill sites

AfriForum also think that other possible solutions that are available for the waste management problem should be considered. These solutions have both advantages and disadvantages but can contribute to help decrease the negative effects of dumping. Possible alternative solutions include:

- Waste to energy
- Eco bricks
- Plastic roads
- Recycling
- Separation at source
- Anaerobic digestion
- Compost

Recycling

Recycling is a growing industry that contributes to decreased volumes of raw resources used in the manufacturing of products. It prevents the unnecessary dumping of usable materials in landfill sites, decreases

the tempo at which landfill sites fill up, and contributes to a more aesthetic environment. Many recyclable materials find their way into the garbage where it is forgotten. AfriForum has launched a recycling project in Centurion, which is gaining momentum every month.



A street in Jeffreys Bay is repaired by making use of plastic waste.

PPPs

A public-private partnership or PPP refers to a long-term agreement between an organ of state such as a



AfriForum's recycling project in Centurion

municipality and a private entity, usually a registered company. PPPs aim to divide the financial and operational risks between an organ of 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 turn on their investment. In the case of service delivery partnerships, the operational risk is often shifted to the private partner. This type of PPP is usually of relatively short duration.

Municipalities find themselves in a rapidly changing technological environment and often cannot access such technologies because of competitive costs. In contrast, role-players in the private sector compete on a level playing field and make 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 state. For the general public it will mean delivery of better and cost-efficient services, which will leave a surplus of financial means to deliver even more services.

What do the experts say?

AfriForum had discussions with two experts in waste research, Professor Linda Godfrey and Professor Suzan Oelofse of the CSIR.

1. According to them, the importance of a broader systems perspective to municipal waste management is becoming increasingly clear. Start with getting the basics right – improved waste collection, city cleansing, and dealing with littering and illegal dumping (an increasing problem in SA).
- 2.

3. Mobilising capex funding at a national level for landfill rehabilitation, closure or new cell development in compliance with legislation.
4. If municipal waste removal services do not address the needs of the local community, it will contribute to illegal dumping. It is therefore paramount to consult with communities in the quest to address inadequate waste services.



Aerial photo of the Soshanguve landfill site

Conclusion

AfriForum's landfill site audit project shows the need for clear political intent and decisions to reuse, recycle and reduce waste in a sustainable way, as well as to maintain and manage the infrastructure for waste management. For this reason, the Minister of the DFFE (back then Environmental Affairs) was approached in 2016 to

feedback to the provincial authorities. Certain aspects made it obvious that the government has lost control over the local authorities. The concerns in some towns are clearly visible if one looks at the total management of municipal services. In most cases where municipalities fail in their duties, the department's solution is to give directives followed by criminal prosecution. The problem with this course of action is that it makes no real difference on ground level, and it is a time-consuming process. Cases that make it to court are also indirectly funded by the taxpayers.

In some cases, the provincial departments refused to give their cooperation for the project and also didn't heed the requests made by the national department.

A simple explanation for this situation is the fact that the DFFE is run by the three different government spheres. The national department institutes laws, policies, norms and standards on national level. They have no power on provincial or municipal level. The province reports to the provincial MEC, not to the Minister.

Municipalities report to the mayor as political leader, not the provincial or national authorities.

Unfortunately, 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 current issues South Africans have to deal with. Moreover, the Constitution requires cooperative governance. National departments are therefore hesitant to act against provinces and municipalities. Rather, they take on a “Big Brother” role in an attempt to help their provincial and municipal contemporaries with mentorship and advice.

The chaos in which the country finds itself can therefore be partly attributed to the political structures aimed at decentralising power.

- corruption
- lack of political will
- lack of leadership and denial of accountability
- lack of the necessary skills in respect of waste management
- gross contempt for the relevant legislation as well as for the natural environment
- insufficient funds for rehabilitation
- mismanagement of available funds
- low priority given to managing landfill sites
- no repercussions for contempt of legislation.

The report also shows that not a single illegal landfill site (a site which does not have a licence nor a waste management plan) conforms to the minimum legal requirements; yet municipalities continue to use these sites as dumping terrains. Very little or no recycling takes place on these sites, and this greatly increases the associated risks for people’s health and the environment. This problem should be addressed as a matter of urgency. The department’s website for landfill sites has been updated, but the licence content and municipal allocations of licences were inaccurate,

therefore it could also mean that some licence numbers differ. Another huge concern that was pointed out, is that municipal workers are not aware of their own licence requirements.

The report shows that there is an increasing number of waste pickers that are taking residence on landfill





Aerial view of a wet weather cell

2. The community's participation in the democratic process was 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 role of the provincial departments in charge of monitoring, legal compliance and issuing of licenses was placed under the spotlight. By involving the provincial regulators in AfriForum's annual landfill site audit project, cooperation between the AfriForum branches and the provincial departments was promoted. It also forces the provincial departments to comply with their constitutional obligations where this may have been omitted in the past. In future, 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 continuously investigates new technologies and alternative ways to improve the functioning of landfill sites as well as looking at alternatives for dumping waste in landfill sites.

Finally, the focus is directed to the most important contributions by national government: the overall supervision of the two lower spheres of government, and the creation of the legislative and regulatory framework which must define South Africa's waste management strategies and the standards set for these. The challenge is to bring together the three spheres of government and the local communities so that they can function in harmony to manage the country's solid waste in a sustainable way.

AfriForum is currently investigating how to put more international pressure on the government, and an announcement on this will be made soon.

AfriForum will continue to monitor the landfill sites that have been audited, and investigate alternatives for satisfactory waste management in South Africa.

MUNICIPAL LANDFILL AUDIT REPORT

