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**Promotion and protection of all human rights, civil,  
political, economic, social and cultural rights,  
including the right to development**

### **Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes on his visit to South Africa**

**Comments by the State\***

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\* The present document is being issued without formal editing.



## **Inputs for the United Nations Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes report**

### **I. Comments on the Special Rapporteur’s draft report (Annexure A)**

<i>Paragraph</i>	<i>Comments</i>
3	Correction of the name of the Ministry, “Forestry, Fisheries and the Environment” and correction of spelling, “Barbara”
4	Refuse removal is a function of local government. Although the South African Local Government Association (SALGA) did not meet with SR as they were not listed on the Aide Memoire, SALGA commented on the draft report as part of this submission.
11	<p>The administrative enforcement action has been exhausted against this Municipality and thus the criminal case was opened, and the matter is under investigation. Most of the evidence has been collected, and once finalised, will be submitted to National Prosecution Authority for prosecution.</p> <p>The South African government has made steady progress in providing access to water and sanitation services. The 2022 Census showed the number of households with access to water as having increased from 80% in 1996 to 91% in 2022. Access to sanitation has increased from 82% in 2001 to 96% in 2022. The country’s programme on increasing access to basic services is well underway, but serious challenges have been encountered in ensuring reliable access to these basic services. The inability to invest in appropriate operations and maintenance is contributed to by the growing unemployment in the country, which means municipalities are largely reliant on grants for capital expenditure, but unable to invest in OPEX as people simply cannot afford to pay for services. South Africa prides itself in having water and sanitation as basic human rights, with the government providing these for free to poor households. The Free Basic services is a policy of the South African government, and this policy implementation is informed by the indigent register. However, the economic situation (GDP growth and increasing employment) needs to improve to be able to sustain the provision of affordable services. Noting this challenge, the South African government has increased its efforts to attract private investment in public infrastructure.</p> <p>Municipal water and sanitation infrastructure is almost exclusively financed by the public sector and the South African government is trying to change this through work being done by the National Water Partnership Office (partnership between: South African Local Government Association (SALGA), DWS and Development Bank of Southern Africa). The partnership office is designing programme that will assist the public sector to access skills and capital from the private sector, this will improve the efficiency in the system both at a CAPEX and OPEX level. What has and remains a challenge is ensuring inclusivity and access for vulnerable groups when the private sector participates in public infrastructure, South Africa is navigating this carefully as equitable access to basic services is a Constitutional imperative for the South African government.</p>
11 & 88	South Africa is classified as a water-stressed country which makes the country highly vulnerable to sustainability threats, a dedicated sub-section on water security should have been included considering the cross-sectoral impacts of water induced by climate change, and non-climatic factors such as population growth and socio-economic dynamics in the country.

Paragraph	Comments
	<p>Although water is cross-referenced in other sections of the report, but it does not significantly deal with issues relating to water security, in terms of water quality and quantity, from an accessibility perspective.</p> <p>Water Research, Development and Innovation Roadmap provides a structured framework to focus the contribution of RDI activity to the implementation of national policy, strategy and planning in water resources management in South Africa. This has been instrumental in ensuring that:</p> <p>Better coordination and improved decision making supported by the translation of research into practice, Faster, more comprehensive deployment of context appropriate performance improvements, and More products and services to reach the market through a better coordinated water innovation pipeline.</p> <p>The contribution of the National Water Research, Development, and Deployment (RDD) is anchored on four key objectives: Increase the availability of water, Improve the governance, planning and management of supply and delivery, Enable water and sanitation services to operate as a sustainable “business”, and Increase the efficiency and productivity of water use.</p> <p>In addition to water impacts, climate change will also impact sanitation. South Africa’s Third National Communication Report indicated that in 2013, municipalities increased the supply of sewerage and sanitation services by 6.2%, raising</p>
12 & 97	<p>It is important to note that since the dawn of democracy there has been a growth in terms of provision of basic services (Refuse Removal, 66.3%; Sanitation, 77.9%; Electricity, 85.4% and Water 89.9%) in the country. Whilst this is an improvement considering the level at which these services were at during the dawn of the democracy, however, regrettable that those who were previously underprivileged still must endure hardship and inadequate care in terms of service delivery. To help households which cannot afford to pay for the services, the government created the free basic policy, which local governments are putting into effect. This is an attempt by the government to solve the issue. Apart from the problem of affordability, another concern is that certain populations lack access to services because of their settlement pattern and location. For example, in certain rural locations where households are far from one another, or in other informal settlements where there is a lack of internal road access where a truck would go around to collect waste, waste management is not available.</p> <p>Several municipalities are attempting to address this issue in different ways. Some encourages residents to place their waste at a central spot, and the municipality would pick it up after a certain period. In rural areas, however, onsite disposal is the norm.</p>
16	<p>Inclusion of the Occupational Health and Safety Act (Act no 85 of 1993) as it is instrumental in protecting occupational health.</p> <p>Although it is acknowledged that some Acts are old, highlighting non-purposeful aspects in the Hazardous Substances Act 15 of 1973 will enable the South Africa to note other areas of improvement which could have been missed since the initiation of the process of reviewing this Act.</p> <p>The Department of Water and Sanitation (DWS) has increased and strengthened its Environmental Management Inspectorate (EMI) capacity; as Peace Officers they are empowered to undertake their criminal investigations to South African Police Service. Furthermore, the DWS has undertaken a legislative review process of both the National Water Act and the Water Services Act to strengthen regulatory processes. In addition, the system for the inclusion of administrative penalties is underway under National</p>

Paragraph	Comments
	Environment Management Act and should improve compliance and provide a strong deterrent.
17	Accountability through enforcement action against Municipal Managers is increasing including more verdicts where heavy penalties were imposed on Municipal Managers.
19	<p>The context that the Constitution section 154 require that the capacity municipalities be supported and strengthened to be able to exercise their powers and perform their functions including refuse collection. There is also the Intergovernmental Relations Act that promote and facilitate intergovernmental relations amongst local, provincial and national government.</p> <p>Given the concurrent nature of the environmental management function, there are Working Groups, MinTech (administrative) and MinMEC (political) structures that meet at least quarterly and they include the three spheres of government for coordination. The Agriculture and Health portfolio also has similar MinMEC structures that coordinate agrochemicals and environmental health matters respectively.</p> <p>Clarity is sought on the oversight authorities that SR is referring to in paragraph 19. On the given example, Department of Water and Sanitation (DWS) has opened criminal cases against Municipalities and Municipal Managers that have failed to comply with their wastewater licences. Due to failure and non-responsive municipalities, the DWS exhausted administrative enforcement process and currently eighty eight (88) criminal cases against fifty-two (52) Municipalities, out of 88, five (5) were finalised by entering into plea sentencing agreement where one out 5 was fined R200 000 000 for polluting the environment and water resources and the department is monitoring the implementation of the court cases, seventy-eight (78) cased opened with active investigations which also includes cases where a decision from the National Prosecuting Authority is awaited. In addition, the Department also obtained five (5) court interdicts against the municipalities and is also monitoring the implementation thereof.</p>
21	<p>The report is missing observations and recommendations in terms of enforcement tools and efficiency thereof from other sectors (excl. environment) covered by the report, since it has been noted in paragraph 20 that the report indicates there are various environmental laws spread across environment, health, agriculture, etc.</p> <p>As well as the Blue Scorpions, who are officials from government responsible for compliance and enforcement in respect of the National Water Act, (Act 36 of 1998).</p>
22, 24 & 25	The Promotion of Access to Information Act is in place and various public and private institutions are mandated by law to enable access to information. The chapeau statement, "...they are often applied in a manner that undermines their intended purpose." is assumed to be isolated and therefore qualified by 25 in relation to mining and agrochemicals related information.
33	The investigations conducted by the Authorities at the time of the incident presented findings that confirmed the facility did not obtain all necessary permits and licences before occupancy. To the contrary had the necessary permits and licenses been obtained then all authorities would have examined the risks and made a collective decision.
34	South Africa's Environmental laws relate to construction activities and environmental risks are assessed and mitigated based on the nature of the activity in the development proposal. In the case of UPL, a Warehouse was the construction activity applied for and authorised. The environmental

Paragraph	Comments
	<p>authorisation issued included a condition to remind the prospective tenants wishing to occupy the Warehouse that there is a legal obligation which requires that the necessary requisite approvals are obtained prior to occupancy. There is no deficiency in the compliance monitoring regime. Rather this is a matter of Property law and contract law and deficiencies in Lessee-lessor contractual obligations.</p>
36	<p>According to this paragraph, engagements with communities by the Special Rapporteur revealed that with the UPL incident there are many communities' whose demands for adequate healthcare, amongst other things remain unheeded till today. More details to qualify the alleged statement is essential, so that this information can be used to address identified inefficiencies in health care provision.</p>
44	<p>There is significant improvements made in air quality monitoring across the country as well as reporting to the general public since the CER report quoted. It is recommended that the Rapporteur considers recently published World Air Quality Report.</p>
47	<p>A just energy transition can only be realised if a just financing mechanism can be provided to assist developing countries with financing the deployment of technologies on carbon capture, use and storage, rather than promoting the outright move away from coal. Currently, the bulk of the finance on low emissions energy technologies is in the form of loans rather than grants. In this regard, most of the funds (estimated to be around 75%) end up going back to the countries that provided the finance. In addition, most of the large-scale green economy related projects will be implemented in developing countries, where the cost of capital (sometimes mostly driven by perception) remains a bottleneck.</p>
54	<p>South Africa's investment in mining Research, Development, and Innovation (RDI) is guided by the South African Minerals Extraction Research, Development and Innovation (SAMERDI) Strategy, which is aimed at materially improving the technological base of mining in South Africa and thereby contributing towards the survival of the sector through the mining of lower grade ores and deeper resources. This is a partnership between the Department of Science and Innovation (DSI) and the Minerals Council South Africa, which is hosted by the Council of Scientific and Industrial Research (CSIR) on behalf of the DSI. The SAMERDI Strategy has the following research programmes:</p> <ul style="list-style-type: none"> <li>- Longevity of current mines</li> <li>- Mechanised mining solutions</li> <li>- Advanced orebody knowledge</li> <li>- Real-time information management systems</li> <li>- Successful applications of technology centred around people</li> </ul> <p>The establishment of a test mine is also a critical activity of SAMERDI. Opportunities to contribute to challenges such as mine rehabilitation could potentially be addressed through the SAMERDI programmes and/or strategic initiatives.</p> <p>Ultimately, interventions that streamline environmental management and support mining in an environmentally, socially and financially sustainable manner should be supported.</p>
57	<p>The National Water Act provides for polluter pay principle to be operationalized. The Waste Discharge Charge System is under implementation and those discharging treated wastewater into the water resources pay a levy based on the quality of the wastewater. This levy is meant to encourage better quality treatment of wastewater. It is critical to indicate that government is assisting on <u>abandoned</u> tailings</p>

Paragraph	Comments
	<p>dams and the mines remain responsible for the management of the tailings dams. It is necessary to emphasise that, with newer operations Government has stricter regulatory controls in place such as Government Notice 704, that requires all tailings dams to be lined.</p>
59 - 61	<p>The environmental impacts associated with historic gold mining activities include the flooding of the underground mine workings and the subsequent generation of decant of AMD.</p> <p>An Inter-Ministerial Committee (IMC) was established to enable inter-departmental cooperation in dealing with the AMD in the Witwatersrand. The IMC subsequently appointed a Technical Committee to coordinate a Team of Experts to prepare a report on the management of AMD in the Witwatersrand. According to the report the following risks have been identified with respect to the flooding of the mines in the Witwatersrand and the subsequent decant of AMD to the environment:</p> <ol style="list-style-type: none"> <li>a) Risk owing to flooding of the mines contamination of shallow groundwater resources required for agricultural use and human consumption and</li> <li>b) Risk owing to the decant of AMD to the environment.</li> </ol> <p>An approach to the management of these risks has been proposed for implementation in the Witwatersrand:</p> <ol style="list-style-type: none"> <li>a) Decant prevention and management through pumping and treating of the Acid Mine Drainage</li> <li>b) Ingress control by closing surface water ingress areas identified in the Witwatersrand and that will result in the reduction of the rate of flooding and the eventual decant volume.</li> </ol> <p>The report was endorsed by Cabinet and funds were allocated to the Department of Water and Sanitation to implement some of the IMC recommendations. In view of the above, the IMC resolved that two departments will assume responsibility as follows:</p> <ul style="list-style-type: none"> <li>• Department of Water and Sanitation to be responsible for the acid mine drainage, and</li> <li>• Department of Mineral Resources and Energy to be responsible for closing surface water ingress areas.</li> </ul> <p>The department is implementing Ingress Control as a measure to combat the generation of Acid Mine Drainage (AMD). Where this intervention is successfully implemented, water is 'saved' from converting into AMD. To date, the combined interventions are estimated to reduce approximately 19ML per day of water ingress, which translated into treatment cost savings of close to 80 million Rands per annum. They are further funding the development of alternative technologies for AMD remediation such as Passive Treatment and In-Situ remediation; both of which address metal and sulphate concentrations over and above pH.</p> <p>It has always been the intention of the Democratic Government of South Africa to protect communities against any safety hazards emerging from irresponsible historical mining activities. The cost of mining related environmental liabilities for the State could have been reduced if the prevailing legislation during the previous mining period required owners/holders to make financial provision for the rehabilitation and closure. This was however not the case and the rehabilitation responsibility, and hence costs, now fall to the State.</p>
60	<p>It is necessary to emphasise that with the construction of the AMD treatment facility in the Eastern Basin, the discharge of partially treated AMD has significantly improved the quality of the Tweelopies Spruit and restored some of the aquatic life in the water resource.</p>

Paragraph	Comments
63	<p>It has also been noted that “around 25% of people in Johannesburg and Ekurhuleni (about 1,600,000 people) live in informal settlements. A quarter of them live in the mining belt. The Special Rapporteur was shocked to learn about the Tudors Shaft informal settlement, which was built directly on a radioactive tailings dam. After years of mobilization, residents of Tudors Shaft were relocated. However, families were given short relocation notices, and many moved to other informal settlements that lacked sanitation and were still too close to tailings dams”.</p> <p>In light of the above, did the Special Rapporteur conduct further investigation with government Human Settlements Department to determine the legality of these informal settlements and what measures were taken by the government to relocate the people and whether the relocation areas were safe, so that government concerns and challenges regarding existence of informal settlements can also be highlighted with recommendations in the report. The report is missing information regarding trends in the population growth and immigration because these are also factors that are contributing to impact in decent housing, environmental challenges, associated burden of disease and set a burden on the government’s ability to provide basic services.</p>
65	<p>South Africa has a long history of mining approximately 150 years, and historically, the environmental aspects of mining were not well regulated. Over the past few years, the Government of South Africa has been involved with the actual rehabilitation of derelict and ownerless mines. Derelict and ownerless mines can be defined as mines whose owners or mining rights, or lease holders have abandoned and are not operating nor maintaining to mitigate and manage their associated health and environmental impacts as well as those mines whose owners or operators can no longer be traced. These would comprise of mines that were operational during the period, (before 1994), when environmental management at the mining sites was not well regulated.</p> <p>The focus has been on the mine openings/shafts that are in close proximity to human settlements and throughfares, particularly those which are posing safety and environmental risk in line with section 24 of the Constitution of the Republic of South Africa, including asbestos mines.</p> <p>The Minerals and Petroleum Resources Development Act, 2002 (act No. 28 of 2002) (MPRDA), as amended, effectively introduced a sustainable approach to the development of mineral and petroleum resources in South Africa, in line with the Constitution, and improved environmental governance in the mining sector significantly. The MPRDA sought to effectively address all the mining environmental issues, with one of its key objectives being to give effect to the environmental right, as contained in section 24 of the Constitution. Over and above the MPRDA, the environmental governance is implemented concurrently with the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) as amended. NEMA is the legislative environmental framework in South Africa, which defines the environmental management approach that should be integrated across all sectors, including the mining sector.</p> <p>In view of the above, government in 2009 developed the National Strategy on the management of Derelict and ownerless Mines and its objectives included amongst others the following:</p> <ol style="list-style-type: none"> <li>a) Compilation and maintenance of an inventory of derelict and ownerless mines to effectively address associated challenges.</li> <li>b) Identification of priority sites in terms of public health and safety, environmental and social risks.</li> <li>c) Development of an Action plan for the management of the risks related to derelict and ownerless mines.</li> </ol>

Paragraph	Comments
	<p>To date government, through the department has developed a comprehensive database inventory as well as the derelict and ownerless mines strategy. The strategy categorises the rehabilitation of these mines into high, medium, and low risk. Asbestos mine rehabilitation has been prioritised as well as closing of hazardous and dangerous mine openings.</p>
66	<p>South Africa conducted the Minamata Initial Assessment (MIA) in 2016 to 2021, revealing the status of Mercury sources and releases within the South Africa. This assessment was undertaken to inform the development of South Africa's National Implementation Plan (NIP) to manage Mercury, including measures to phase out mercury-added products, reduce emissions, and manage Mercury-containing waste. Additionally, the focus is also on efforts to educate the public about Mercury's harmful effects and enhance the capacity of relevant authorities for better monitoring and management. In addition, the government have had consultations with authorities and the public on the management of Mercury in South Africa since 2022 and has published the draft National Regulations for the Management of Mercury in South Africa for public comment on 4 December 2023 (Government Gazette No. 49816, Vol. 702). The purpose of the Regulations is to manage and regulate Mercury throughout the life cycle and value chain, to protect the environment and human health from the anthropogenic releases of Mercury and Mercury compounds.</p> <p>The 16th International Conference on Mercury as a Global Pollutant will be hosted in Cape Town South Africa during 21 – 26 July 2024. This conference offers a greater understanding about many areas of Mercury research, and the best learning experience from globally recognised researchers on a variety of Mercury topics presented as interactive sessions. The country can leverage to drive their contributions to the Minamata Convention on Mercury through this event.</p> <p>16th ICMGP: <a href="https://www.mercurycapetown.com/">https://www.mercurycapetown.com/</a>  Draft Mercury Regulations:  <a href="https://www.dffe.gov.za/sites/default/files/legislations/Draft%20Mercury%20Amendment%20Regulations.pdf">https://www.dffe.gov.za/sites/default/files/legislations/Draft%20Mercury%20Amendment%20Regulations.pdf</a></p>
67	<p>How is the loss of 12 million points of IQ worldwide attributed to mercury exposure measures? Is it direct or indirect exposure?</p>
71	<p>The paragraph if retained given the correction linked to the heavy metal Lead not Mercury could read “South Africa has also instituted measures to control the use and import of <b>Lead and Lead-containing products such as paints</b>. One such measure is training provided by the Department of Forestry, Fisheries, and the Environment and the Department of Health to customs and border control officials on the identification of <b>lead-containing paints.</b>”</p> <p>It is further proposed that the following be considered:  “South Africa (through the Department of Health) is in the process of revising the declared list of hazardous substances under the Hazardous Substances Act, 15 of 1973 to list Mercury and Mercury compounds as Group I hazardous substances and prohibiting the use of mercury for ASGM. The gradual phase out of Mercury based medical equipment's (thermometers and sphygmomanometers) has already commenced, since some of the provinces have adopted a provincial phase out policy”.</p>
79	<p>Housing programme on removing asbestos roofing is being rolled out in various provinces including Mpumalanga.</p>
87	<p>The various spheres of the South African government cooperate prevent and manage health effects linked to pesticide exposure. The Western Cape Government Health and Wellness Department forms part of an intergovernmental task team (3 Spheres of government) to address challenges</p>



Paragraph	Comments
	<p>experienced by farmworkers with exposure to pesticides on vineyards in the Cape Winelands District and the West Coast District.</p> <p>Detailed information (e.g. farm name and number) to assist with protection of occupational health linked to the Statement, "...heard from women farm workers who reported being asked to work in the vineyards right after pesticide spraying, without being provided personal protective equipment and while a thick layer of pesticides still covered the grapes" can aid the South African authorities to act against the non-compliance.</p>
89	<p>In line with the international commitment, South Africa is working towards the phasing-out of highly hazardous pesticides where the risks have not been managed and where safer and affordable alternatives are available, and to promote transition to and make available those alternatives by 2035.</p>
90	<p>It is acknowledged that the Act is old. The basis for amendment require substantive grounds and where relevant, changes occasioned by different International Conventions incl. Rotterdam Convention have been effected. Amendment and Publication of Regulations occurs from time to time including the latest publication of 25 August 2023. This latest publication, amongst others, is aimed at phasing out active ingredients and their pesticide formulation that potentially may cause cancer, genetic mutation and damage to fertility of the public including unborn children. Implementation of the Globally Harmonised System of classification and labelling of chemicals, restrictions of sale and use of certain hazardous pesticides, disclosure by agrochemical companies on the amount of pesticides sold and other measures are all part of the legislative reforms that have been integrated over the years. Each sector has its own functions as guided by the Constitution and relevant Acts, and consultation on cross-cutting mandates does take place where necessary. If some scenarios that depict coordination challenge in this paragraph can be highlighted, to address and clarify overlapping roles as recommended.</p> <p>It is a matter of concern if the Special Rapporteur in paragraph 20 acknowledges the existence of the Multistakeholder Committee on Chemicals Management, which is aimed at coordination of efforts, minimisation of duplication, and maximisation of resources of relevant national departments but at the same time highlight challenges of coordination that needs to be addressed.</p>
91	<p>South Africa is currently reviewing the legislative framework that governs pesticides to address identified gaps and improve safety measures to human health and the environment. In addition, the framework will address the gaps to improve transparency, public participation and access to information.</p>
96	<p>It is, however, important to note that lack of land for settlement exacerbate the problem as people move to urban centers to look for opportunities. Due to lack of land, some resort to invade any land and build informal settlements. Most of the land invaded is not suitable for settlement as some are prone to disaster. Some of the examples are where people start informal settlements in the buffer zone of the landfill sites, riparian zones next to rivers, areas next to the tailing dams, etc. While it is expected of municipalities to uphold settlement by-laws, there are legal requirements that must be followed when evicting residents. For example, the municipality is required to provide alternate accommodation, which has occasionally proven to be difficult and it takes time to follow due process.</p>
98	<p>The South African government has also put in in place the National Waste Management Strategy which advocates for the waste hierarchy in the management of waste. The waste hierarchy has also been applied to Health Care Risk waste in some of the Provinces and it is being rolled out nationally.</p>

Paragraph	Comments
	<p>Western Cape Government Health and Wellness Department with support from the Western Cape Government Department of Environmental Affairs and Development Planning (DEA-DP) has implemented Alternate Health Care Risk Waste Disposal Systems at 9 hospitals in the Western Cape for the “green management” of hazardous non anatomical medical waste which has reduced pressure on the Hazardous Landfill Site. The department is also represented on the City of Cape Town Residence Monitoring Committee which monitors the operational activities including licensing requirements at municipal landfill sites in the Cape Metro.</p> <p>Lack of land for residential settlements exacerbate land invasions within areas that are not suitable for housing in urban centres (e.g. areas in the vicinity of riverbanks and landfill sites).</p> <p>The South African government has made a determined effort to increase the rate at which it is investing in waste infrastructure. The national government's conditional grants to municipalities have been rearranged to allow them to purchase specialized waste vehicles for the collection and disposal of waste. This is crucial since waste management is logistically complex and demands fair infrastructure investment.</p>
99	<p>South Africa faces a challenge of super-urbanisation with more than sixty-three percent (63%) of people calling cities their primary home. The City of Johannesburg alone attracts about 10 000 migrants a month. The short and medium effects of these determining structural factors are obvious, not least, on the capacity of our public infrastructure to cope with the increasing demands and pressures. Cities and towns face major challenges in dealing with urbanisation, migration, diminishing resources, and climate change. The financial compensation of waste pickers for waste collection through the polluter pay extended producer responsibility schemes is one way that the South African government is leveraging financial resources in pollution prevention and management. Extended Producer Responsibility Regulations have been in place since 2020.</p> <p>The management of landfill sites remains an issue. Most landfill sites struggle to adhere to authorization conditions of the applicable legal requirements. There are several variables that contribute to this, but to remedy the situation, several interventions are being implemented, some of which are included below:</p> <p>Given that landfill operations need a lot of resources to run to a high standard and are often out of the reach of many municipalities, partnerships with the private sector help manage some of the sites. Additionally, municipalities are encouraged to procure specialized waste vehicles by utilizing the reformed national grants system.</p> <p>Constant capacity building in waste management for council members and municipal officials in charge of waste management. Council members are prioritized for the purpose of influencing and securing political will.</p>
103	<p>It is a point of emphasis that there are also Blue Scorpions that need to be included.</p> <p>Blue Scorpions focus on enforcement of compliance on water-related matters.</p>
110	<p>The statement specifically referring to, “most” is not accurate as 75% of households receive refuse removal services.</p>
115(h)	<p>Inclusion of Blue Scorpions</p>