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APPLICATION FOR A WATER USE LICENCE FOR THIRSTI BOTTLING PLANT

Ref No. WU41899
GCS Ref. No: 25-0109

PURPOSE OF THE DOCUMENT

The purpose of this document is to provide Interested and Affected Parties (I&APs) with information regarding the Thirsti Bottling Plant Water Use Licence Application (WULA).

The aim of this document is thus to:

- Provide I&APs with background information about the WULA;
- Explain the application process followed; and
- Indicate how an I&AP can become involved in the process, receive information, raise issues, and make comments.

LOCATION

The Thirsti Bottling Plant is a prominent facility located in Normandien, KwaZulu-Natal, South Africa. (Figure 2 and Figure 3).

PROJECT DESCRIPTION

The Thirsti Bottling Plant is a prominent facility located in Normandien, KwaZulu-Natal, South Africa. Established in 2015, the plant is situated at the foothills of the Klein Drakensberg Mountains, an area renowned for its natural springs. The water sourced is naturally filtered through ancient geological formations, resulting in a mineral-rich composition with a high pH of 8, making it both refreshing and alkaline.

Production began in 2015, focusing on the bottling of natural and sparkling spring water, and has since expanded to include fruit-flavoured water. Due to Thirsti's continued growth, the bottling plant now proposes an expansion, which will trigger additional water use requirements

Although Thirsti currently uses several boreholes, these are not formally authorised. Thirsti is now applying for a Water Use Licence (WUL) to regularise and expand its groundwater use in line with national water legislation.

LEGISLATIVE CONTEXT

A WULA is being submitted by Thirsti to the Department of Water and Sanitation (DWS) in terms of the National Water Act, 1998 (Act No. 36 of 1998) (NWA), and the Regulations Regarding the Procedural Requirements for Water Use Licence Applications and Appeals, 2017 (Government Notice R267 of 24 March 2017) (WULA Regulations). The application is required for the following water use as defined in Section 21 of the NWA:

- **Section 21(a): Taking water from a water resource.**
Applicability: This refers to the abstraction of groundwater from boreholes. As such, the abstraction qualifies as a regulated water use and must be formally authorised through a WULA process in accordance with the NWA and supporting regulations.
- **Section 21(c) - Impeding or diverting the flow of water in a watercourse.**
- **Section 21(i) - Altering the beds, banks, course and characteristics of a watercourse.**
Applicability: Thirsti Bottling Plant is located within 500 m of a wetland, this activity qualifies as a regulated water use and must be formally authorised through a WULA process in accordance with the NWA and supporting regulations.
- **Section 21 (g): Disposing of waste in a manner which may detrimentally impact on a water resource.**

Applicability: The use of a septic tank at the Thirsti Bottling Plant constitutes the disposal of domestic waste in a manner that may detrimentally impact on a water resource, particularly given its proximity to a wetland. As such, this activity qualifies as a water use and must be formally authorised through a WULA process in accordance with the NWA and supporting regulations.

DELEGATED LEAD AUTHORITIES

The DWS is the delegated authority responsible for the administration and implementation of the NWA.

THE WATER USE LICENCE PROCESS

GCS Environment South Africa (Pty) Ltd (GCS) has been appointed as the independent environmental consultant to manage the WULA process on behalf of Thirsti.

A WULA is a legal requirement under the NWA to ensure the sustainable use and protection of South Africa's water resources. The process plays a critical role in:

- Promoting environmental stewardship;
- Preventing the degradation and pollution of water resources;
- Ensuring compliance with national legislation;
- Minimising the risk of legal penalties; and
- Enhancing transparency through stakeholder engagement.

The following key steps form part of the WULA process (Figure 1):

- **Pre-application engagement with DWS:** The applicant must meet with the DWS to confirm the need for a WUL, understand site-specific requirements, and obtain guidance on the application scope.
- **Appointment of an independent environmental consultant:** An independent environmental consultant is then appointed to manage the process, compile the WUL report, and coordinate public participation.
- **Identification of Applicable Section 21 Water Uses:** The independent environmental consultant and applicant identify which of the 11 water uses in Section 21 apply.
- **Compilation of Technical and Specialist Studies:** Relevant specialist studies are

undertaken to assess the implications of the proposed water use.

- **Public Participation Process (PPP):**
 - A Draft WUL Report is made available for a minimum 60-day public comment period. A Comment and Response Report (CRR) is compiled to document and respond to stakeholder concerns.

You are hereby invited to review the Draft WUL Report and submit comments during the public comment period, which will run from 26 February 2026 to 30 April 2026 at the following locations:

- **Newcastle Library: 66 Scott Street, Newcastle, 2940, +27 (0)34 328 7620**
- **Thirsti Security Gate: Buffelshoek Farm Erf 15469 (P39 Road)**
- **GCS website: <https://www.gcs-sa.biz/public-documents/>**

Written comments and substantiated issues must be submitted to GCS by 30 April 2026. Early submissions are encouraged to allow the GCS sufficient time to address concerns comprehensively.

- **Final Submission to DWS:** The Final WUL Report, including technical documents, maps, and the CRR, is submitted to DWS for review and decision-making.
- **DWS Review and Decision:** DWS assesses the application against criteria such as water availability, environmental impact, alignment with the National Water Resource Strategy, and socio-economic benefits. A decision is typically made within 300 days (or longer for complex cases).
- **Notification and Appeal:** All registered I&APs are notified of the outcome. An appeal can be lodged within 30 days of the decision, in terms of the National Appeal Regulations, 2025.



Figure 1: Key steps form part of the WULA process

REGISTERING AS AN INTERESTED AND AFFECTED PARTY

By registering as an I&AP, you will be included in the Project stakeholder database and receive further information in future for comment. Your comments will ensure that all relevant issues are incorporated and addressed.

Please complete and submit the enclosed registration / comment sheet or contact GCS if you wish to comment or register on the Project. I&APs who wish to participate by contributing comments, or who would like to obtain more information, should please contact:

GCS Environment South Africa (Pty) Ltd
Attention: Marandela Muzhambi
 Tel: +27 (0)11 803 5726, Fax: +27 (0)11 803 5232

E-mail: ppp@gcs-sa.biz / MarandelaM@gcs-sa.biz

Postal Address: PO Box 2597, Rivonia, Johannesburg, 2128

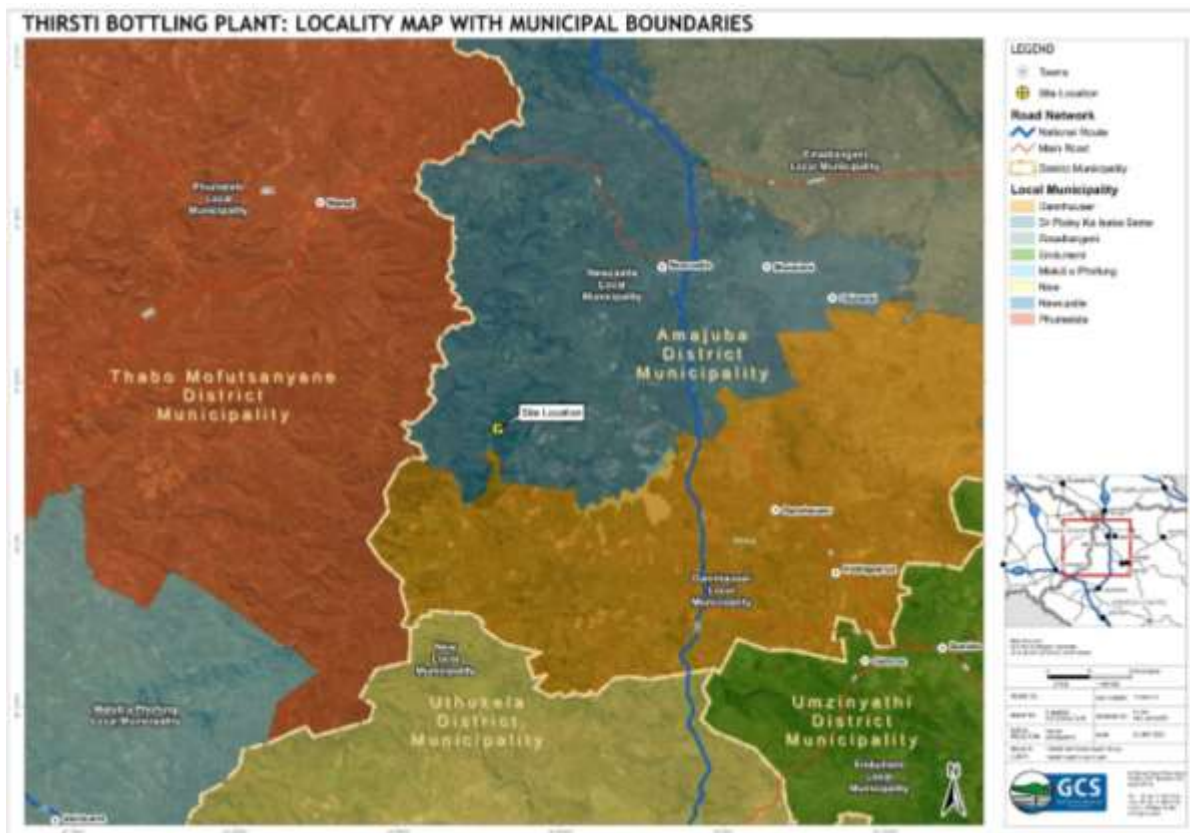


Figure 2: Locality of Thirsti Bottling Plant

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REGISTRATION AND COMMENT FORM

Registered Interested and Affected Party (I&AP) will be informed of ongoing developments via their preferred means of communication (SMS, e-mail, post or fax). Please register as an I&AP and provide comments by sending this form, or other written correspondence, to the contact details provided below:

GCS Environment South Africa (Pty) Ltd
Attention: Marandela Muzhambi
 Tel: +27 (0)11 803 5726, Fax: +27 (0)11 803 5232
 E-mail: ppp@gcs-sa.biz / MarandelaM@gcs-sa.biz
 Postal Address: PO Box 2597, Rivonia, Johannesburg, 2128

Please formally register me as an Interested and Affected Party	Yes	No
I would like to receive my notifications by	E-mail	SMS

Please indicate which sector you represent and also provide a name

Government Department	
Municipality	
Community	
Non-Government Organisation	
Business	

If you are a *landowner* or *land occupier*, please indicate which farm(s) and portion(s) you reside on

Landowner	
Land occupier	

Please fill in your contact details below for the Project database

Title, Full Name				
Designation				
Cell phone		Fax		Tel
E-mail				

