WESKUS DISTRIKSMUNISIPALITEIT
WEST COAST DISTRICT MUNICIPALITY

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Address all correspondence to:

MUNISIPALE BESTUURDER/
MUNICIPAL MANAGER

Navrae/Enquiries: C Ganten-Bein
Verw.Nr. /Ref. No.: 12/3/1/11

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ATMOSPHERIC EMISSION LICENCE CONTEMPLATED IN SECTION 43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004, (ACT NO. 39 OF 2004)

This Atmospheric Emission Licence (AEL) is issued to West Point Processors (Pty) Ltd in terms of Section 40(1)(a) of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("the Act"), in respect of Listed Activity Category 10: Animal matter processing.

This AEL replaces all previously issued AELs and is valid from 18 November 2025 until 08 August 2029.

The licence holder must submit to the licencing authority a notification of intention to renew the AEL **one (1) year** before the expiry date. The AEL renewal application with all the necessary supporting documentation must be submitted to the licencing authority **six (6) months** before the expiry date of the AEL.

The reason for the issue of this atmospheric emission licence is by virtue of an AEL variation application.

This atmospheric emission licence must be read with supporting documentation as amended.

This atmospheric emission licence is issued with conditions and requirements set out below, which are binding on the holder of this atmospheric emission licence namely West Point Processors.

1. ATMOSPHERIC EMISSION LICENCE ADMINISTRATION

Name of the Licensing Authority	West Coast District Municipality
Atmospheric Emission Licence Number	WCWD015
Atmospheric Emission Licence Issue Date	18 November 2025
Atmospheric Emission Licence Type	Atmospheric Emission Licence (Variation)
Review date, not later than	As determined by the licensing authority

Air Quality Officer: ..... Senior Manager: Municipal Health: S. Groenboom Date: 18 November 2025

2. ATMOSPHERIC EMISSION LICENCE HOLDER DETAILS

Enterprise Name	West Point Processors (Pty) Ltd
Trading as	West Point Processors (Pty) Ltd
Enterprise Registration Number	1990/07321/07
Registered Address	Main Road West Point, St Helena Bay
Postal Address	P.O. Box 15, St Helena Bay, 7390
Telephone Number (General)	(022) 736 1100
Industry Sector	Processing of Pelagic Fish to Fishmeal
Name of Responsible Officer (ACO)	Jan-Taljaard Marx
Name of Emission Control Officer (ECO)	Dudley Lesch
Telephone Number	(022) 736 1100 (ACO and ECO)
Cell Phone Number	067 592 6785 (ACO) 079 155 5331 (ECO)
Fax Number	(022) 736 1282 (ACO and ECO)
Email Address	jt@saldanha.co.za dudley@saldanha.co.za
After Hours Contact Details	067 592 6785 (ACO) 079 155 5331 (ECO)
Land Use Zoning as per Town Planning Scheme	Fishing industry

3. LOCATION AND EXTENT OF PLANT

Physical Address of the Premises	Main Road, St Helena Bay.
Description of Site (Erf)	Erf 1097, St. Helena Bay 7181/91 / Department of Land Affairs
Coordinates of Approximate Centre of Operations	Latitude: 32°46''40.1" S Longitude: 18°02'57.4" E
Property Registration Number (Surveyor-General Code)	CO 460001030100907000
Extent (km^2)	0.15803km^2
Elevation Above Mean Sea Level (m)	± 5m
Province	Western Cape
District Municipality	West Coast District Municipality
Local Municipality	Saldanha Bay Municipality
Designated Priority Area	N/A

4. GENERAL CONDITIONS

4.1. Process and ownership changes

The holder of the provisional atmospheric emission licence must ensure that all unit processes and apparatus used for the purpose of undertaking the listed activity in question, and all appliances and mitigation measures for preventing or reducing atmospheric emissions, are at all times properly maintained and operated.

No building, plant or site of works related to the listed activity or activities used by the licence holder shall be extended, altered or added to the listed activity without authorisation from the competent authority. The investigation, assessment and communication of potential impact of such an activity must, where relevant, follow the basic assessment procedure as prescribed in the Environmental Impact Assessment Regulations published in terms of section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as amended.

Any changes in processes or production increases, by the licence holder, will require prior approval by the licensing authority.

Any changes to the type and quantities of input materials and products, or to production equipment and treatment facilities will require prior written approval by the licensing authority.

The licence holder must, in writing, inform the licensing authority of any change of ownership of the enterprise. The licensing authority must be informed within 30 (thirty) days after the change of ownership.

The licence holder must immediately on cessation or decommissioning of the listed activity inform the licensing authority in writing.

4.2. General duty of care

The holder of the licence must, when undertaking the listed activity, adhere to the duty of care obligations as set out in section 28 of the NEMA.

The licence holder must undertake the necessary measures to minimize or contain the atmospheric emissions. The measures are set out in section 28(3) of the NEMA.

Failure to comply with the above condition is a breach of the duty of care, and the licence holder will be subject to the sanctions set out in section 28 of the NEMA.

All abnormal and emergency incidences must be investigated and be reported to the relevant authorities in terms of Section 30 of the NEMA.

4.3. Sampling and/or analysis requirements

Measurement, calculation and/or sampling and analysis shall be carried out in accordance with any nationally or internationally acceptable standard. A different method may be acceptable to the licensing authority as long as it has been consulted and agreed to the satisfactory documentation necessary in confirming the equivalent test reliability, quality and equivalence of analyses.

The licence holder is responsible for quality assurance of methods and performance. Where the holder of the licence uses external laboratories for sampling or analysis, accredited laboratories shall be used.

4.4. General requirements for licence holder

The licence holder is responsible for ensuring compliance with the conditions of this provisional licence by any person acting on his, her or its behalf, including but not limited to, an employee, agent, sub-contractor or person rendering a service to the holder of the licence.

The provisional licence does not relieve the licence holder to comply with any other statutory requirements that may be applicable to the carrying on of the listed activity.

A copy of the provisional licence must be kept at the premises where the listed activity is undertaken. The provisional licence must be made available to the environmental management inspector representing the licensing authority who requests to see it.

The licence holder must inform, in writing, the licensing authority of any change to its details including the name of the emission control officer, postal address and/or telephonic details.

The licence holder must at least twice a year and additionally when circumstances arise, report to an environmental forum comprising of, amongst others, civil society group's representative of residents in receptor areas, neighbouring land users and the general public affected by the impact of the listed activity. If such forum does not exist, the licence holder must establish such a forum. The licence holder must report on its activity to the licensing authority in the form of meeting minutes.

4.5. Statutory obligations

The licence holder must comply with the obligations as set out in Chapter 5 of the Act.

4.6. Payment of atmospheric emission licence processing fee

The licence holder will be liable for the payment of an Atmospheric Emission Licence (AEL) processing fee as may be determined by the Licensing Authority from time to time.

5. NATURE OF PROCESS

5.1. Process description

The process entails the operation of a fishmeal processing plant producing fishmeal products. Fishmeal is produced by processing fish using the following unit processes:

- Cookers
- Separating Equipment
- Pressers
- Stick Water Evaporation
- Conveyors
- Steam Driers
- Extraction System
- Sea Water Scrubber
- Chemical Scrubber
- Dry-milling
- Packing
- Fish oil

Fish sources, offloading and storage:

Raw fish is caught with fishing vessels and offloaded by means of a vacuum system into the fish holding facility. The onsite cannery trimmings are gathered and directed to the fishmeal plant processing stream. The demersal fish trimmings (off-cuts) produced by the Sea Harvest fish processing plant located in Saldanha are transported in containers via a truck to West Point Processors (See Standard Operating Procedure). The containers containing the demersal fish trimmings (off-cuts) are offloaded into the on-site cold storage units at the West Point Processors processing facility. The Demersal fish trimmings (off-cuts) are retrieved by forklift from the on-site cold storage units and transported to a hopper or fed directly into the processing stream from where it is conveyed into the processing system.

Production relates to Total Allowable Catch by vessel approved by Regulatory Authorities, as well as fish material sourced from the onsite cannery and demersal fish trimmings (off-cuts) produced by the Sea Harvest fish processing plant located in Saldanha. Pelagic fish and demersal fish trimmings (off-cuts) are used as a raw material.

The cold chain will be maintained for demersal trimmings (See Standard Operating Procedure). At the source, the trimmings are kept in a temperature-controlled environment to ensure that the raw material remains in good condition and does not deteriorate prior to transport.

Demersal trimmings (off-cuts) are transported from the Sea Harvest fish processing plant site by truck in temperature-controlled containers. Upon arrival at the facility, the material is kept in cold containers, where it remains until processing begins. The trimmings (off-cuts) are collected from the cold containers and feeds directly into the processing stream.

Fish cooking and dewatering:

The raw fish is transported into the processing plant directly from the fish holding tanks into the continuous steam jacketed cookers. The fish is cooked in the cookers and all excess liquids are extracted with dewatering screens and presses and decanters.

Depending on operational requirements, the trimmings is either blended with other fish material or processed separately. Where trimming meal is produced in isolation, it may be blended with industrial fishmeal on an ad-hoc basis.

Separation and evaporation:

The liquid phase is put through centrifuges where the oil is separated from the stick water. The oil is polished by adding hot water to the oil and putting through a centrifuge. Separating equipment includes Separators and Oil polishers.

The stick water is evaporated in a Waste Heat or steam evaporating plant into concentrate which is added back into the solid press cake before it is dried.

Drying:

The meal is partially dried with Disc steam driers and then dried in the Rotor Tube driers. The dryer function is seen as one drying step that can be utilised in various configurations.

Milling and Filtration:

The meal is then conveyed to the Hammer mills where it is milled. From the mills the meal is transported by a conveyor, and chemicals are added to the product before reaching the scale. Dust generated in this area is removed by cyclone and bag filters.

Bagging and Meal Warehouses:

From the scale, the final product is bagged into 50kg or 1 ton bulk bags. The bagged fish meal is labelled and stored in the warehouses. The fishmeal bags are loaded from the warehouse for transport.

Steam generation:

Steam required and used for cooking and evaporating of liquids from the process is generated by coal and HFO boilers.

Seawater scrubber and chemical scrubber:

The water vapour collected from the plant is sent to the Seawater scrubber where steam is condensed and odour carrying particulate matter is removed.

The remaining air from the Seawater scrubber is then routed to the Chemical scrubber for the removal of odour before it is released into the atmosphere.

5.2. Listed activity or activities

List of all Listed Activities, as published in terms of Section 21 of the AQA, authorised to be conducted at the premises by the licence holder:

Listed Activity Number	Category of Listed Activity	Sub-category of the Listed Activity	Name of the Listed Activity	Ruler Name & Description of the Listed Activity
1	10	N/A	Animal Matter Processing	Processes for the rendering cooking, drying, dehydrating, digesting, evaporating or protein concentrating of any animal matter not intended for human consumption.
The following special arrangement shall apply: Best practice measures intended to minimise or avoid offensive odours must be implemented by all installations. These measures must be documented to the satisfaction of the Licensing Authority.				

Condition: Listed activity or activities:

1. The licence holder must adhere, at all times, to section 35(2) of the National Environmental Management: Air Quality Act, Act 39 of 2004, which states:

   "*The occupier of any premises must take reasonable steps to prevent the emission of any offensive odour caused by any activity on such premises.*"

5.3. Unit process or processes

List of all unit processes associated with the listed activities to be undertaken at the site of work.

Unit Process	Unit Process Function	Batch or Continuous Process
Offloading Jetty	Area where industrial fish (Pelagic) is offloaded from the vessels	Continuous
On-site Cold storage Units	Containerised demersal fish trimmings (off-cuts) storage area	Continuous
Cookers	Cooking of raw fish	Continuous
Presses / Dewatering/ Screens / Decanter	Dewatering of cooked fish	Continuous
Dryers	Drying of cooked fish to fish meal	Continuous
Milling	Size reduction of fish meal	Continuous

Unit Process	Unit Process Function	Batch or Continuous Process
Packing	Packing of fishmeal in 50kg or 1000kg bags for storage or transport as well as bulk storage	Continuous
Oil Separators and Polishers	Separating press water into stick water and fish oil as well as the polishing of fish oil	Continuous
Stick Water Evaporators	Concentration of stick water	Continuous
Coal Boilers	Steam generation	Continuous
H.F.O boilers	Steam generation	Continuous
Sea Water Scrubber	Condensing of steam and removal of condensable odour carrying particulate matter.	Continuous
Chemical Scrubber	Secondary treatment of condensable and non-condensable compounds.	Continuous
Fish Pits	Raw fish is stored prior to processing	Continuous
Oil tanks	Tanks are used for the storage of fish oil	Continuous
Coal Ash Storage Area	Area where coal ash is stored prior to removal from site	Continuous
Biomass Boiler	Possible future installation - TBC	TBC

5.4. Hours of operations

Indicate the hours of operation of all unit processes associated with the listed activities at the site of work.

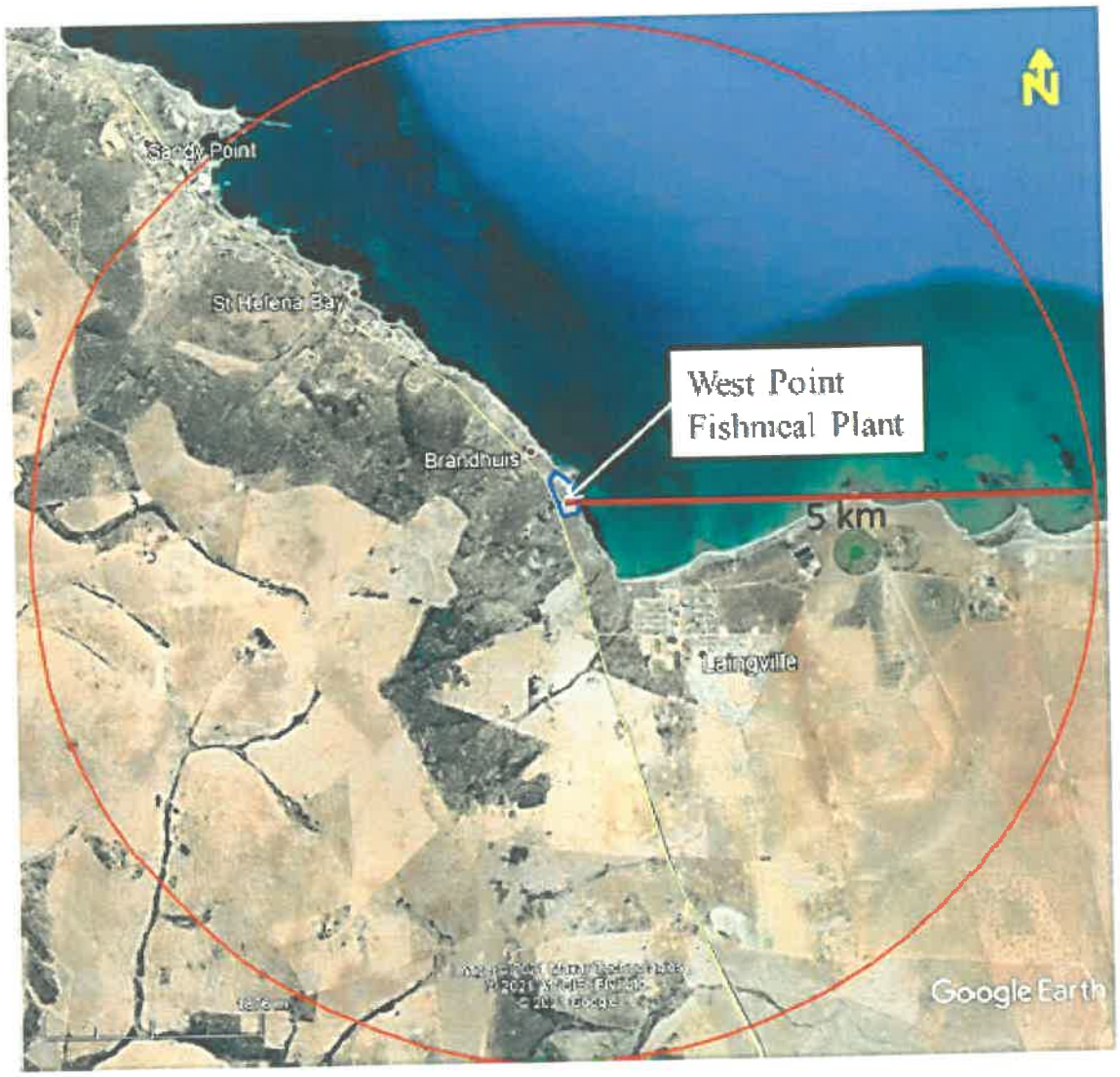
Unit Process	Operating Hours	Days of Operation per Year
Offloading Jetty	24 hours / day	365
On-site Cold storage Units	24 hours / day	365
Cooking Cookers	24 hours / day	365
Presses / Dewatering / Screens / Decanter	24 hours / day	365
Drying Dryers	24 hours / day	365
Dry Milling	24 hours / day	365
Packing	24 hours / day	365

Unit Process	Operating Hours	Days of Operation per Year
Oil Separators and Polishers	24 hours / day	365
Stick Water evaporation Evaporators	24 hours / day	365
Coal Boilers	24 hours / day	365
H.F.O boilers	24 hours / day	365
Sea Water Scrubber	24 hours / day	365
Chemical Scrubber	24 hours / day	365
Fish Pits	24 hours / day	365
Oil tanks	24 hours / day	365
Coal Ash Storage Area	24 hours / day	365
Biomass Boiler	Possible future installation - TBC	TBC

5.5. Graphical process information

Diagrams depicting the graphical operation for the entire operation:

Geographical Location



Air Quality Officer: ..... Senior Manager: Municipal Health: S. Groenboer Date: 18 November 2025

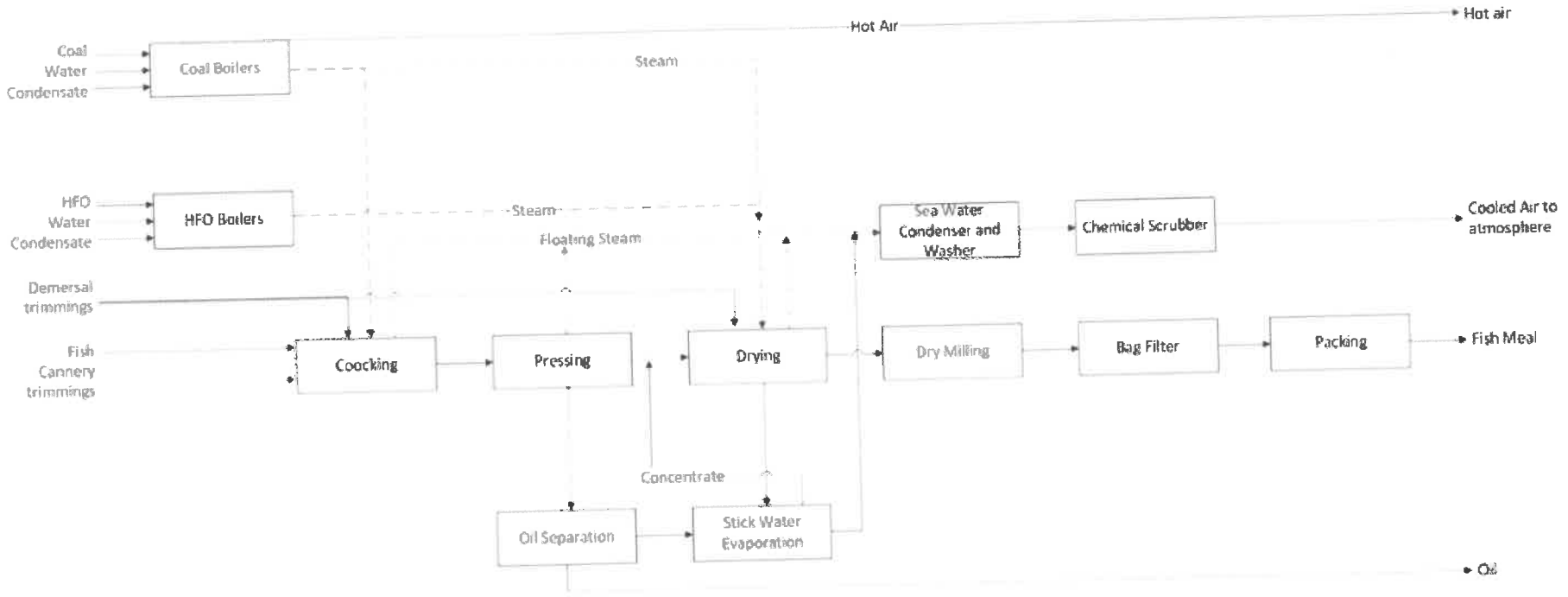
Context plan of the site situated on Erf 1097



WCWD015

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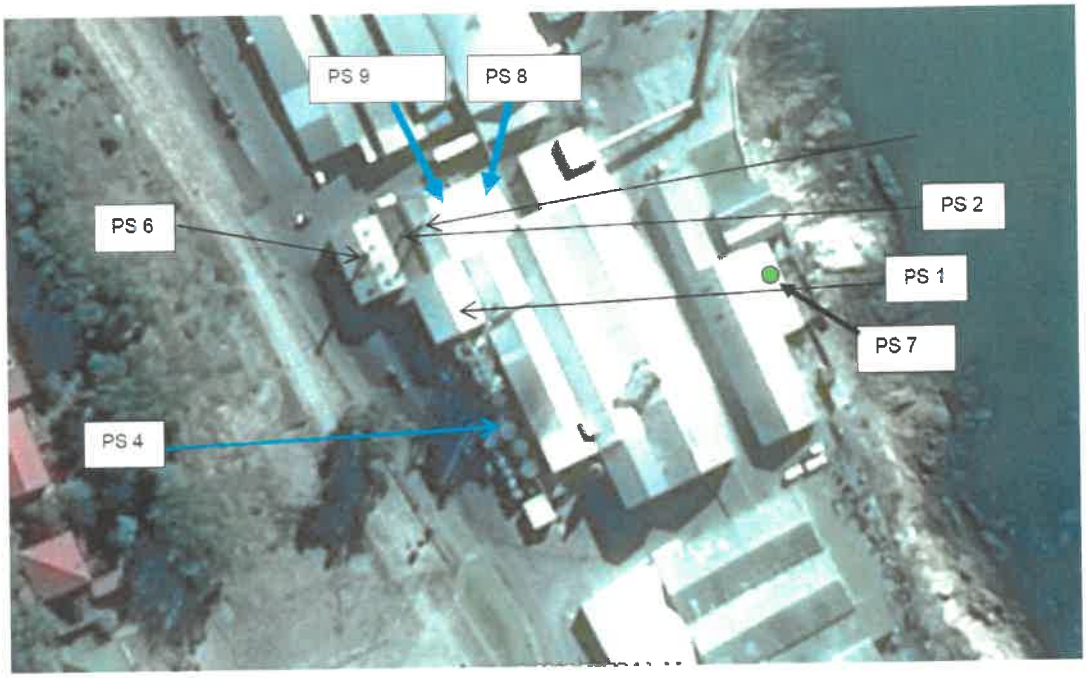
Simplified block diagram:



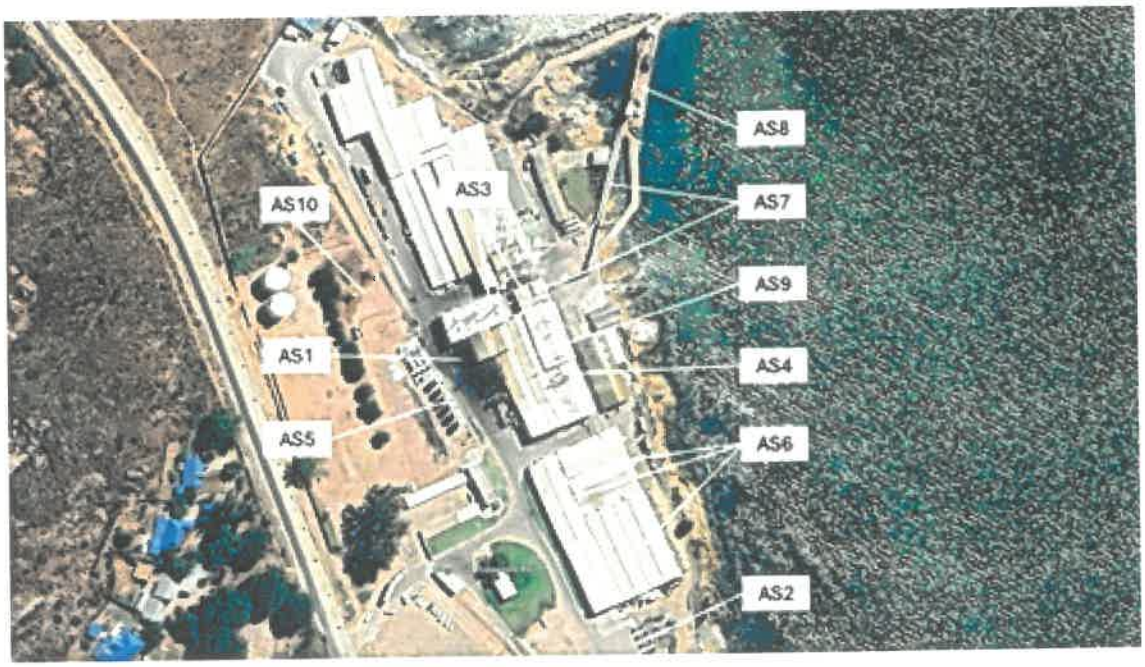
The diagram will be the same for all phases . The only difference is that Phase 2 will utilise LSO in the two HFO Boilers and Phases 3 & 4 will utilise one HFO Boiler only (with the added option of adding biomass over coal boilers from phase 3).

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Locations of Point Sources



Locations of area sources



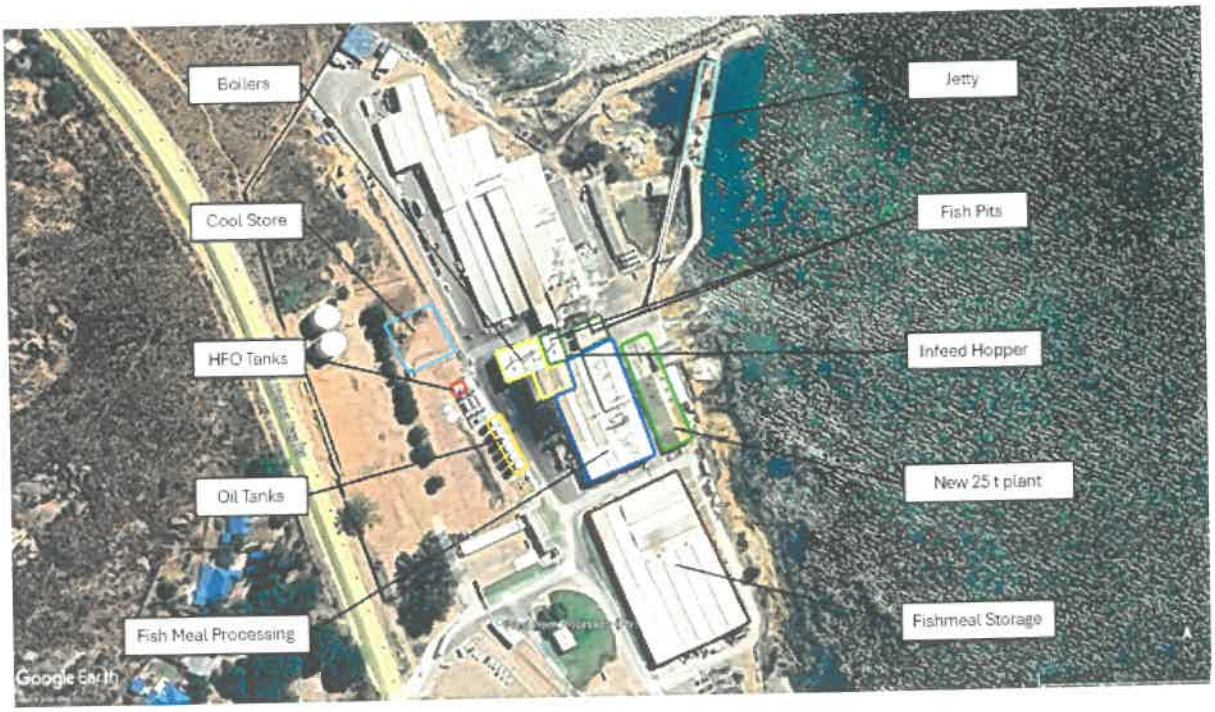
Air Quality Officer: ..... Senior Manager: Municipal Health S. Gleeson Date: 18 November 2025

Location of West Point Processors and the respective departments



***Note: The residential houses of WPP is vacant and may be demolished in 2026.**

Simplified site layout of West Point Processors



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RAW MATERIALS AND PRODUCTS

6.1. Raw materials used

Regulated Raw Materials		
Raw Material Type	**Maximum Permitted Consumption Rate (Quantity)**	**Units (quantity/period)**
Pelagic fish and/or demersal fish trimmings (off-cuts)	120	Tons/hour
Formaldehyde	2.5	Litre/ton
Non-regulated Raw Materials		
Raw Material Type	**Maximum Permitted Consumption Rate (Quantity)**	**Units (quantity/period)**
Antioxidant in meal	5	Litre/ton
Antioxidant in oil	5	Litre/ton
Water	225000	Litre/hour

* **Regulated raw materials** refers to those materials when increased or decreased may result in the change of air emissions output.
* **Non-regulated raw materials** refers to those materials when increased or decreased may not result in any change of air emissions output.

Conditions: Raw materials used

1. Fish as described in the process description above is the only raw material allowed for the processing of fishmeal.

2. The maximum permitted consumption rate of 120 tons/hour is the limit for both fishmeal processing plant facilities combined. This consumption rate of raw material to be processed may not exceed the 120 tons/hour limit at any given time.

3. If at any time, complaints rise due to the transportation and / or processing of the demersal fish trimmings (off-cuts) that is transported into the facility, other than vessel, it will be required of the use of demersal fish trimmings (off-cuts) to discontinue and the receiving of raw material from Sea Harvest processing plant located in Saldanha to discontinue on a date determined by the licencing authority.

4. Licence holder must provide detailed description and diagram of how the raw material will be stored at the source, how the raw material will be transported to the facility, how the raw material will be stored at the facility prior to processing and how the raw material will enter into the fishmeal process.

5. Raw fish material trucked-in must be processed within 8 hours after being removed from the on-site cold storage. Record must be kept and provided to the licencing authority when requested.

6. The new raw material must be used in the process as described in the Standard Operating Procedure (SOP) provided by the licence holder. See condition 7.7.

7. A detailed record relating to the cold chain of the trucked-in raw material must be kept at all times and be made available to the licensing authority upon request.

8. Record must be kept detailing the date and time of receiving the trucked-in raw material and the date and time of processing the trucked-in raw material.

9. The H_2S continuous emissions monitor must be installed and operational within two (2) months from the date of this AEL. If the H_2S continuous emissions monitor is not install and commissioned, then the use of demersal fish trimmings (off-cuts) trucked-in from Sea Harvest fish processing plant locate in Saldanha must immediately discontinue. Proof of such discontinuation must be provided to the licencing authority within five (5) working days.

10. If at any time the H_2S continuous emission limits are exceeded, the use of demersal fish trimmings (off-cuts) material as a raw material must immediately discontinue and the raw material must be removed from site. Removal records (safe disposal certificates) must be provided to the licencing authority upon request.

11. The facility's EMP and FEMP to be updated and submitted to the licencing authority one (1) month from date of this AEL.

12. No other sourced (raw material) may be utilised other than that mentioned in item 5.1 process description above.

6.2. Production rates

Product Name	Maximum Permitted Production Capacity (Quantity)	Units (quantity/period)
Fish Meal	30	Tons/hour
Fish oil	18	Tons/hour

6.3. Materials used in energy sources

Materials for Energy Source	Actual Consumption Rate (Quantity)	Units (quantity/period)	Materials Characteristics
Coal	7.7	Tons/hour	0.8% Sulphur 20% Ash:
Electricity	3.5 (Plus additional 2 MVA)	MW/hour	N/A
H.F.O.	1.5	Tons/hour	0.2% Sulphur
*LSO	TBC	TBC	TBC
*Biomass	TBC	TBC	TBC

***Conditions: Materials used in energy sources**

1. Licence holder to confirm the quantities, units and material characteristics for LSO and biomass prior to the commencement of utilisation of these fuels.

2. Licence holder to confirm the usage of electricity in MW/hour on completion of all four phases.

6.4. Sources of atmospheric emission

6.4.1. a) Point source parameters - Existing Plant

Point Source Code	Source Name	Latitude (decimal degrees)	Longitude (decimal degrees)	Height of Release Above Ground (m)	Height Above Nearby Building (m)	Diameter at Stack Tip / Vent Exit (m)	Actual Gas Exit Temperature (°C)	Actual Gas Volumetric Flow (m³/hr)	Actual Gas Exit Velocity (m/s)	Emission Hours	Type of Emission (Continuous / Batch)
		South	East								
PS1	20T Coal Boiler (12.5 MW) #5	-32.776609	18.049740	31	18.8	1.1	197	39888	11.66	24 Hours	Continuous
PS2	1 X H.F.O. Boiler (8.4 MW) #6	-32.776510	18.049594	20	4	1.4	220	17000	6.6	24 Hours	Continuous
PS3	1 X H.F.O. Boiler (7.4 MW) #8	-32.776490	18.049646	16	8.5	1.2	220	17100	7.0	24 Hours	Continuous
PS04	Cookers / Separators / Polishers / Pressers / Decanters / Screens / Stick Water Plants / Conveyors / Steam Driers / Sea Water Scrubber / Chemical Scrubber	-32.776604	18.050106	11	2	1.5	35	54000	2	24 Hours	Continuous
PS6	1 X 16T Coal Boiler (10.03 MW)	-32.776552	18.049502	15	6	1.2	210	45000	9.2	24 Hours	Continuous
PS8	1 x 20T Coal Boiler (12.5 MW) #7	-32.776453	18.049837	31	18.8	1.1	197	39888	11.66	24 Hours	Continuous

(b) Point source parameters - Future Upgrades Phases 3 to 4

PS9	1 x 20T Coal Boiler (12.5 MW)	-32.776477	18.049763	31	18.8	1.1	197	39888	11.66	24 Hours	Continuous
PS7	Chemical Scrubber Stack (New Plant)	-32.776648	18.050536	15	5	0.5	29	3989	5.65	24 Hours	Continuous
PS... TBC	Possible future installation: Wood Chip Boiler MW TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC

Condition: Point Source Parameters - Future Upgrades Phases 3 to 4

- The licence holder must inform the licensing authority of date of commencement of each change to the plant and the commissioning of new equipment.
- Stack testing of the new stacks must be conducted within 6 months from the date of commissioning the equipment utilised by the new stacks and the reports to be submitted to the licensing authority. Note condition 7.4.

6.4.2. Area and/or line source parameters

Area Source Code	Source Name	Source Description	Latitude (decimal degrees) of SW corner	Longitude (decimal degrees) of SW corner	Height of Release Above Ground (m)	Length of Area (m)	Width of Area (m)	Emission Hours	Type of Emission (Continuous / Intermittent)
AS1	Coal Storage Bunker	Storage area for coal	-32.776698	18.049604	0	25	30	24 Hours	Continuous
AS2	Coal Ash Storage Area	Storage area for coal ash	-32.776579	18.049427	0	25	25	24 Hours	Continuous
AS3	Fish Storage Pits	Storage area for fish pending processing	-32.774419	18.049976	6	40	20	24 Hours	Continuous
AS4	Bag Filters	Filtering the dust from the hammer mills air flow	-32.776766	18.050259	12	15	16	24 Hours	Continuous

Area Source Code	Source Name	Source Description	Latitude (decimal degrees) of SW corner	Longitude (decimal degrees) of SW corner	Height of Release Above Ground (m)	Length of Area (m)	Width of Area (m)	Emission Hours	Type of Emission (Continuous / Intermittent)
AS5	Oil Tanks	Tanks are used for the storage of fish oil	-32.777058	18.049561	8	8	40	24 Hours	Continuous
AS6	Fishmeal Storage Warehouses	Finished product fishmeal bagging and storing area	-32.777561	18.050516	12	130	56	24 Hours	Continuous
AS7	Conveyor Belt System	Transportation of fish from vessels to storage pits	-32.775633	18.050579	1 - 6	182	3	24 Hours	Continuous
AS 8	Offloading Jetty	Area where fish is offloaded from the vessels	-32.775633	18.050579	0	62	6	24 Hours	Continuous
AS 9	Fishmeal production plant	Area where fishmeal is produced	-32.774419	18.049976	14	68	39	24 Hours	Continuous
AS 10	On-site Cold storage Units	Containerised demersal fish trimmings (off-cuts) storage area	- 32.776358	18.048989	2.6	45	28	24 Hours	Continuous

Air Quality Officer: ..... Senior Manager: Municipal Health: ..... Date: 18 November 2025

7. APPLIANCES AND MEASURES TO PREVENT AIR POLLUTION

7.1. a) Appliances and control measures – Existing plant

Associated Source Code	Appliances			Abatement Equipment Control Technology							
	Appliance / Process Equipment Number	Appliance Serial Number	Appliance Type / Description	Abatement Equipment Technology Name and Model	Abatement Equipment Technology Manufacture Date	Commission Date	Date of Significant Modification / Upgrade	Technology Type	Design Capacity	Minimum Control Efficiency (%)	Minimum Utilisation (%)
PS4	N/A	N/A	Cookers Separators Presses Stick Water Plant Conveyors Steam Driers Decanters Oil Polishers Sea Water Scrubber Chemical Scrubber	Seawater Scrubber and Chemical Scrubber	2014 2017	2017	2017	Condensation and Scrubbing	3.3m³/S outlet	90	90
PS6 16T Coal Boiler (10.03MW)	N/A	BS 2790-1982	Coal Boiler	Grid Arrestor	1982	2004	2016	Separation	12m³/s	98	98
PS1 (20T Coal Boiler) (12.5MW) #5	N/A	72106	Coal Boiler	Grid Arrestor	2021	2021	2021	Separation	12m³/s	98	98

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Associated Source Code	Appliances			Abatement Equipment Control Technology							
	Appliance / Process Equipment Number	Appliance Serial Number	Appliance Type / Description	Abatement Equipment Technology Name and Model	Abatement Equipment Technology Manufacture Date	Commission Date	Date of Significant Modification / Upgrade	Technology Type	Design Capacity	Minimum Control Efficiency (%)	Minimum Utilisation (%)
PS 8 20TCoal Boiler (12.5 MW) #7	N/A	72107	Coal Boiler	Grid Arrestor	1980	2024	TBC	Separation	12m³/s	98	98

7.1. b) Appliances and control measures – Future upgrades phases 3 to 4

Associated Source Code	Appliances			Abatement Equipment Control Technology							
	Appliance / Process Equipment Number	Appliance Serial Number	Appliance Type / Description	Abatement Equipment Technology Name and Model	Abatement Equipment Technology Manufacture Date	Commission Date	Date of Significant Modification / Upgrade	Technology Type	Design Capacity	Minimum Control Efficiency (%)	Minimum Utilisation (%)
PS9 (20T Coal Boiler) (15.5MW)	TBC	TBC	Coal Boiler	Grid Arrestor	TBC	TBC	TBC	TBC	TBC	TBC	TBC
PS7 Chemical Scrubber	TBC	TBC	Fishmeal Processing	Sea Water & Chemical Scrubber	TBC	TBC	TBC	TBC	TBC	TBC	TBC
Dry mills Stack TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
Biomass Boiler	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC

Air Quality Officer: ..... Senior Manager: Municipal Health: S. Greenwood Date: 18 November 2025

Conditions: Appliances and control Measures: Future upgrades phases 3 to 4

1. Boilers with a design capacity of less than 10MW each, must be registered with the Local Municipality. Proof of communication must be submitted to the licensing authority three (3) months from commissioning date of each boiler.
2. All missing information (marked as TBC) must be provided to the licensing authority within three (3) months from date of commissioning of each new equipment or upgrade of equipment.

7.2. a) Point source – maximum emission rates (under normal working conditions) – Existing facility

Point Source Code	Pollutant Name	Maximum Release Rate			Duration of Emissions
		(mg/Nm³)	Date to be Achieved By	Average Period	
PS4	H_2S	5	Immediate	1 Hour	Continuous
PS6 (10.03 MW)	PM	250	Immediate	24 Hours	Continuous
	SO_2	2800			
PS1 (12.5 MW)	PM	250	Immediate	24 Hours	Continuous
	SO_2	2800			
PS 8 (12.5 MW)	PM	250	Immediate	24 Hours	Continuous
	SO_2	2800			

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7.2. b) Point source – maximum emission rates (under normal working conditions) – Future upgrades phases 3 to 4

Point Source Code	Pollutant Name	Maximum Release Rate			Duration of Emissions
		(mg/Nm³)	Date to be Achieved By	Average Period	
PS9 (12.5 MW)	PM	120	Immediate	24 Hours	Continuous
	SO_2	2800			
PS7 (Chemical Scrubber)	H_2S	5	Immediate	1 Hour	Continuous
Biomass Boiler TBC	PM	120	Immediate	24 Hours	Continuous
	SO_2	1000			

Conditions: Point Source – operating requirements for both current and future upgrades:

1. Under normal operating conditions, raw material (as per the process description, item 5.1) must be of such a quality that when processed, emissions will not impact negatively on the environment as well as human health and well-being.

2. The holder must maintain a TVBN monitoring program on site. The program must comprise of a system to sample a representative quantity of the raw product prior to processing. A daily representative sample of raw product must be taken as per the facility's TVBN Sampling Procedure. The TVBN results must be recorded and provided to the licensing authority upon request.

3. The holder must prevent deviations from normal operating conditions and must scale back or hault its operations under excessive emissions if such emissions have or is likely to have a negative impact on the environment as well as human health and well-being.

4. The holder must prevent deviations from normal operating conditions. Refer to Environmental Management Plan (EMP) if deviations occur. Inform the licencing authority on same day of deviation.

5. If unforeseen incidents or circumstances occur, the procedure as per EMP must be followed. All unforseen incident relating to the processing of fishmeal must inform the licensing authority on same day.

6. An automated continuous H_2S monitoring device to be installed and maintained as per manufacturer specifications. The licence holder must ensure that the device is optimally operated and records of the recorded emissions tare kept and submitted to the licensing authority upon request. Note Condition 7.7.

7.3. a) Point source – maximum emission rates (under start-up, maintenance and shut-down conditions) – Existing plant

Point Source Code	Pollutant Name	Maximum Release Rate		Average Period (Instantaneous, Hourly, Daily, Monthly, Annually)	Maximum Gas Volumetric Flow (m^3/hr)	Maximum Gas Exit Velocity (m/s)	Emission Hours	Permitted Duration of Emissions
		(mg/Nm^3)	Date to be Achieved By					
PS4 (Cookers / Separators / Polishers / Pressers / Decanters / Stick Water Plant / Steam Dryers / Seawater Scrubber / Chemical Scrubber	H_2S	>5	Immediate	Hourly	54 000	5	1 Hour	Immediately apply additional dosing to bring the H_2S limit to below $5mg/Nm^3$ If additional dosing is not effective, apply contingency measures as per the FEMP. Scale back or halt operation if a) Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention of Section 35 (2) of NEM: AQA relating to control of offensive odours; and (b) When critical control points such as odour control equipment is non-functional or requires maintenance; and c) Emissions exceeds allocated limits.

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Point Source Code	Pollutant Name	Maximum Release Rate		Average Period (Instantaneous, Hourly, Daily, Monthly, Annually)	Maximum Gas Volumetric Flow (m^3/hr)	Maximum Gas Exit Velocity (m/s)	Emission Hours	Permitted Duration of Emissions
		(mg/Nm^3)	Date to be Achieved By					
PS6 (16T Coal Boiler) (10.03MW)	PM	>250	Immediate	Instantaneous	45 000	9.2	Permitted Dark Smoke 20 minutes (start-up) 10 minutes (abnormal conditions) 14 minutes (soot blowing)	Scale back or halt operation if a) Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention of Section 35 (2) of NEM: AQA relating to control of offensive odours; and (b) When critical control points such as odour control equipment is non-functional or requires maintenance; and c) Emissions exceeds allocated limits.
	SO_2	>2800						
PS1 (20T Coal Boiler) (12.5MW)	PM	>250	Immediate	Instantaneous	39888	11.66	Permitted Dark Smoke 20 minutes (start-up) 10 minutes	Scale back or halt operation if a) Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention of Section 35 (2) of NEM: AQA relating to control of offensive odours; and (b) When critical control points such as odour control equipment is non-functional or requires maintenance;
	SO_2	>2800						

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							(abnormal conditions) 14 minutes (soot blowing)	and c) Emissions exceeds allocated limits.
PS8 (20T Coal Boiler) (12.5MW)	PM	>250	Immediate	Instantaneous	39888	11.66	Permitted Dark Smoke 20 minutes (start-up) 10 minutes (abnormal conditions) 14 minutes (soot blowing)	Scale back or halt operation if a) Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention of Section 35 (2) of NEM: AQA relating to control of offensive odours; and (b) When critical control points such as odour control equipment is non-functional or requires maintenance; and c) Emissions exceeds allocated limits.
	SO_2	>2800						

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7.3. b) Point source – maximum emission rates (under start-up, maintenance and shut-down conditions) – Future upgrades phases 3 to 4

Point Source Code	Pollutant Name	Maximum Release Rate		Average Period (Instantaneous, Hourly, Daily, Monthly, Annually)	Maximum Gas Volumetric Flow (m^3/hr)	Maximum Gas Exit Velocity (m/s)	Emission Hours	Permitted Duration of Emissions
		(mg/Nm^3)	Date to be Achieved By					
PS9 (12.5MW)	PM	>250	Immediate	Hourly	TBC	TBC	Permitted Dark Smoke 20 minutes (start-up) 10 minutes (abnormal conditions) 14 minutes (soot blowing)	Scale back or halt operation if a) Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention of Section 35 (2) of NEM: AQA relating to control of offensive odours; (b) When critical control points such as odour control equipment is non- functional or requires maintenance; and c) Emissions exceeds allocated limits.
	SO_2	>2800						
PS7 (Chemical Scrubber)	H_2S	>5	Immediate	Hourly	TBC	TBC	1 Hour	Scale back or halt operation if a) Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention of Section 35 (2) of NEM: AQA relating to control of offensive odours; (b) When critical control points such as odour control equipment is non- functional or requires maintenance; and c) Emissions exceeds allocated limits.

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Biomass boiler	PM	>120	Immediately	Hourly	TBC	TBC	Permitted Dark Smoke 20 minutes (start-up) 10 minutes (abnormal conditions) 14 minutes (soot blowing)	Scale back or halt operation if a) Emissions have or is likely to have a negative impact on the environment as well as human health and wellbeing or are in contravention of Section 35 (2) of NEM: AQA relating to control of offensive odours; (b) When critical control points such as odour control equipment is non- functional or requires maintenance; and c) Emissions exceeds allocated limits.
	SO_2	>1000						

Conditions: Point source – maximum emission rates (under start-up, maintenance and shut-down conditions) for both existing and future installations:

1. When deviations or incidences relating to the entire fishmeal process occurs:
   a) The licence holder must inform such deviation or incident to the Licensing Authority in writing on same day of such deviation or incident.
   b) Vessels to halt catching fish until the plant is operating optimally.
   c) No further catches to be offloaded until such time that the plant is operating optimally.

7.4. a) Point source – emission monitoring and reporting requirements – Existing plant

Point Source Code	Emission Sampling / Monitoring Method	Sampling Frequency	Sampling Duration	Parameters to be Measured	Parameters to be Reported	Reporting Frequency
PS4	As per approved method – Annexure A of GN 893.	As per approved method – Annexure A of GN 893.	In accordance with approved method	H_2S	H_2S	Twice per Annum
PS1	As per approved method – Annexure A of GN 893.	As per approved method – Annexure A of GN 893.	In accordance with approved method	PM and SO_2	PM and SO_2	Once per Annum
PS6	As per approved method – Annexure A of GN 893.	As per approved method – Annexure A of GN 893.	In accordance with approved method	PM and SO_2	PM and SO_2	Once per Annum
PS8	As per approved method – Annexure A of GN 893.	As per approved method – Annexure A of GN 893.	In accordance with approved method	PM and SO_2	PM and SO_2	Once per Annum

Conditions: Point source – emission monitoring and reporting requirements: Existing plant

1. Emission measurements methods other than those contained in Annexure A of Government Notice No. 893 as amended from time to time, may only be used with the written consent of the National Air Quality Officer. The outcome of the decision must be submitted to the licensing authority prior to deviation.

2. Reports to be submitted to the licensing authority at the frequencies stated above.

3. If at any time the monitoring results for the boilers are non-compliant, it will be required of the licence holder to implement remedial action and after such action is completed to secure an external service provider to conduct a test to confirm compliance or if additional remedial action is required before conducting another test. It will also be required that the report indicating remedial action with timeframes must be submitted to the licensing authority within a specified timeframe as determined by the licensing authority. Monitoring reports must be submitted to the licencing authority as soon as it is received from the service provider.

4. If at any time the monitoring results for the sea water scrubber and chemical scrubber stacks are non-compliant, it will be required of the licence holder to implement remedial action and after such action is completed to secure an external service provider to conduct a test to confirm compliance or if additional remedial action is required before conducting another test. It will also be required that the report indicating remedial action with timeframes must be submitted to the licensing authority within a specified timeframe as determined by the licensing authority. Monitoring reports must be submitted to the licencing authority as soon as it is received from the service provider.

5. The licensing authority reserves the right to implement stricter conditions at any time if the situation demands.

6. The licence holder must install a continuous H_2S monitoring device on the chemical scrubbers. The device must be automated to continuously monitor and record H_2S levels and include alerts to automatically allow additional dosing in order to reduce potential odorous emissions. The continuous H_2S records must then be provided to the licensing authority upon request. Note condition 7.7.

7. Complaints must be investigated and feedback provided to the complainant and the licencing authority on the same day the complaint was received.

7.4. b) Point source – emission monitoring and reporting requirements – Future upgrades phases 3 to 4

Point Source Code	Emission Sampling / Monitoring Method	Sampling Frequency	Sampling Duration	Parameters to be Measured	Parameters to be Reported	Reporting Frequency
PS 9	As per approved method – Annexure A of GN 893.	As per approved method – Annexure A of GN 893.	In accordance with approved method	PM and SO_2	PM and SO_2	Once per Annum
PS 7	As per approved method – Annexure A of GN 893.	As per approved method – Annexure A of GN 893.	In accordance with approved method	H_2S	H_2S	Twice per Annum
PS (TBC) Biomass boiler	As per approved method – Annexure A of GN 893.	As per approved method – Annexure A of GN 893.	In accordance with approved method	PM and SO_2	PM and SO_2	Once per Annum

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Conditions: Point source – emission monitoring and reporting requirements: Future upgrades phases 3 to 4

1. Emission measurements methods other than those contained in Annexure A of Government Notice No. 893 as amended from time to time, may only be used with the written consent of the National Air Quality Officer. The outcome of the decision must be submitted to the licensing authority prior to deviation.

2. Reports to be submitted to the licensing authority at the frequencies stated above.

3. If at any time the monitoring results for the boilers are non-compliant, it will be required of the licence holder to implement remedial action and after such action is completed to secure an external service provider to conduct a test to confirm compliance or if additional remedial action is required before conducting another test. It will also be required that the report indicating remedial action with timeframes must be submitted to the licensing authority within a specified timeframe as determined by the licensing authority. Monitoring reports must be submitted to the licencing authority as soon as it is received from the service provider.

4. If at any time the monitoring results for the sea water scrubber and chemical scrubber stacks are non-compliant, it will be required of the licence holder to implement remedial action and after such action is completed to secure an external service provider to conduct a test to confirm compliance or if additional remedial action is required before conducting another test. It will also be required that the report indicating remedial action with timeframes must be submitted to the licensing authority within a specified timeframe as determined by the licensing authority. Monitoring reports must be submitted to the licencing authority as soon as it is received from the service provider.

5. The licensing authority reserves the right to implement stricter conditions at any time if the situation demands.

6. It will be required of the licence holder to install a continuous H_2S monitoring device on the chemical scrubbers. The device must be automated to continuously monitor and record H_2S levels and include alerts to automatically allow additional dosing in order to reduce potential odorous emissions. The continuous H_2S records must then be provided to the licensing authority upon request.

7.5. Area and/or line source – management and mitigation measures

Area and/or Line Source Code	Area and/or Line Source Description	Description of Specific Measures	Timeframe for Achieving Required Control Efficiency	Method of Monitoring Measures Effectiveness	Contingency Measures
AS 1	Coal Storage Bunker	Coal storage bunker containment in bunker, operator to avoid spillage, maintenance, and no material is to accumulate outside this area.	Immediate	Routine inspections and maintenance.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.
AS 2	Coal Ash Storage Area	Coal ash storage area containment in bins or bags, regular removal by contractor. Call for removal when 70% capacity is reached to avoid overflow.	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.
AS 3	Fish Storage Pits	Fish storage pits – regular cleaning, keep covered and contained and maintained, keep all surfaces smoothed out. All raw and waste material must be processed during a specific shift and no build-up of material must be allowed.	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.
AS 4	Bag Filters System	Bag filters are regularly cleaned and replaced on monthly basis	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.

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Area and/or Line Source Code	Area and/or Line Source Description	Description of Specific Measures	Timeframe for Achieving Required Control Efficiency	Method of Monitoring Measures Effectiveness	Contingency Measures
AS 5	Oil Tanks	Containers containing fish oil.	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.
AS 6	Fishmeal Storage Warehouses	Finished product fishmeal bagging and storage area.	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.
AS 7	Conveyor Belt System	Transports raw material from vessels to fish storage pits	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.
AS 8	Offloading Jetty	Area where fish is offloaded from the vessels onto the conveyor belt	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.

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AS 9	Fishmeal production plant	Area where fishmeal is produced	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.
AS 10	On-site Cold storage Units	Containerized demersal fish trimmings (off-cuts) storage area	Immediate	Permanent on-site ECO does weekly checks and quarterly audits. Annual external audits also take place.	As per EMP. If the issue is identified, line manager is notified to rectify immediately, check the following week by ECO.

Condition: Area and/or line source – management and mitigation measures

An updated Environmental Management Plan (EMP) (addressing sources of dust and odour) must be submitted to the licensing authority within one (1) months from receipt of this licence.

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7.6. Routine reporting and record-keeping

Complaints register

The licence holder must maintain a complaints register at its premises, and such register must be made available for inspections. The complaints register must include the following information on the complainant, namely, the name, physical address, telephone number, date and the time when the complaint was registered. The register should also provide space for noise, dust and offensive odours complaints.

Furthermore, the licence holder is to investigate and, monthly, report to the licencing authority in a summarised format on the total number of complaints logged. The complaints must be reported in the following format with each component indicated as may be necessary:

(a) Source code / name;
(b) Root cause analysis;
(c) Calculation of impacts / emissions associated with incidents and dispersion modelling of pollutants, where applicable;
(d) Measures implemented or to be implemented to prevent recurrence; and
(e) Date by which measures will be implemented.

The licensing authority must also be provided with a copy of the complaints register. The record of a complaint must be kept for at least 5 (five) years after the complaint was made.

Quarterly reporting

The licence holder must furnish the licensing authority with a quarterly report on the form prescribed by the licensing authority and attend the West Coast Air Quality Working Group meetings as arranged.

Annual reporting

The licence holder must complete and submit to the licensing authority an annual report. The report must include information for the year under review (i.e. annual year end of the company). The report must be submitted to the licensing authority not later than 60 (sixty) days after the end of each reporting period.

The annual report must include, amongst others, the following items:
(a) Pollutant emissions trend;
(b) Compliance audit report(s);
(c) Major upgrades projects (i.e. abatement equipment or process equipment);
(d) Greenhouse gas emissions; and
(e) Report relating to the best practice investigation for improvement implementation.

Also note condition 7.7 relating to investigations to be included in the annual report.

The holder of the licence must keep a copy of the annual report for a period of at least 5 (five) years.

Reporting to the National Atmospheric Emissions Inventory System:

The licence holder must in terms of paragraph (19) of GN No. 893 of 22 November 2013 report the information contemplated in paragraph (17) of GN No. 893 to the internet – based national system in the format required by the National Atmospheric Emissions Inventory System.

Greenhouse Gas Reporting

7.6.19 Reporting in terms of S43 (1)(l) shall be done in accordance with the National Greenhouse Gas Reporting Regulations.

7.7. Investigation

The following investigations are required:

No.	Investigation	Purpose	Completion Date
1.	Investigate and implement best practices to avoid offensive odours impacting on the neighbouring land users and residents.	To control and avoid offensive odour emissions from point and non-point sources.	Ongoing Report to form part of the annual report.
2.	Install a H_2S continuous monitoring device at the chemical scrubbers.	To continuously monitor and record H_2S levels to ensure emissions are kept below the AEL H_2S limit. Device to include alerts and automated dosing when H2S level are close to the AEL limit to prevent exceedances.	Report with installation timeframes to be provided to the licence holder within 6 months from date of this AEL issue date.
3.	Investigate effective abatement measures to reduce or eliminate Trimethylamine odours.	To effectively reduce or eliminate Trimethylamine odours escaping into the receiving environment and causing an odour nuisance.	A report to be submitted to the licensing authority as part of the annual report.
4.	Provide the licensing authority with a TVBN sampling and analysis Standard Operating Procedure (SOP)	To sample the quality of the raw material intended for fishmeal processing.	The TVBN SOP to be submitted to the licensing authority within six (6) months from issuance of this licence.
5.	Provide the licensing authority with an updated Environmental Management Plan (EMP).	To establish procedures to effectively mitigate, monitor and manage odours and emissions throughout the plant.	EMP to be submitted to the licensing authority within six (6) months from issuance of this licence.
6.	Investigate for implementation methods to remove raw material from the pits for disposal.	If circumstances are of such a nature that the raw material in the pits cannot be processed in a manner to prevent a negative impact on the surrounding environment and communities.	A report of implementation to be submitted to the licensing authority as part of the annual report.

7.	A Standard Operating Procedure (SOP) to be drawn up that document the manner in which the Demersal fish trimmings (off-cuts) raw material is sourced, stored at located site, transported, offloaded and processed. The SOP to include the cleaning procedure.	To have clear outline of how the raw material ties in with the existing plant operations and to better control possible odour emissions.	A report to be submitted to the licensing authority within three (3) months from receipt of this license.

8. DISPOSAL OF WASTE AND EFFLUENT ARISING FROM ABATEMENT EQUIPMENT CONTROL TECHNOLOGY

The disposal of any waste and effluent arising from the abatement equipment control technology must comply with the relevant legislation and requirements of the relevant authorities.

Source Code / Name	Waste / Effluent Type	Hazardous Components Present	Method of Disposal
PS 4	Effluent Water	None	As per Coastal Water Discharge Permit.
PS 6	Fly Ash	Dust	Collect in bags and remove together with Coal Ash.
Ps 7 (Future plant)	Effluent Water	None	As per Coastal Water Discharge Permit.
PS 1	Fly Ash	Dust	Collect in bags and remove together with Coal Ash.
PS 8	Fly Ash	Dust	Collect in bags and remove together with Coal Ash.
PS 9	Fly Ash	Dust	Collect in bags and remove together with Coal Ash.

9. PENALTIES FOR NON-COMPLIANCE WITH LICENCE AND STATUTORY CONDITIONS OR REQUIREMENTS

Failure to comply with any of the licence and relevant statutory conditions and/or requirements is an offence, and licence holder, if convicted, will be subjected to those penalties as set out in section 52 of the NEM: AQA.

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