Western Cape Government

Department of Environmental Affairs and Development Planning
Rainer Chambeau
Development Management (Region 1)
Rainer.Chambeau@westerncape.gov.za | Tel: 021 483 2729

EIA REFERENCE NUMBER: 16/3/3/1/F4/20/3005/22
ENQUIRIES: Mr. R. Chambeau
DATE OF ISSUE: 27 JULY 2022

The Director
West Point Processors (Pty) Ltd.
P.O. Box 15
ST HELENA BAY
7390

For Attention: Mr. M. Potgieter

Cell: (082) 551 0217
Email: marthin@saldanha.co.za

Dear Sir

APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED): THE PROPOSED EXPANSION OF THE WEST POINT FISH MEAL PROCESSING PLANT ON ERF 1097, ST HELENA BAY.

1. With reference to the above application, this Department hereby notifies you of its decision to **grant** Environmental Authorisation, together with the reasons for the decision.

2. In terms of Regulation 4 of the Environmental Impact Assessment Regulations, 2014 (as amended), you are instructed to ensure, within 14 days of the date of the decision on the application, that all registered interested and affected parties ("I&APs") are provided with access to the decision and reasons for the decision, and that all registered I&APs are notified of their right to appeal.

3. Your attention is drawn to Chapter 2 of the National Appeal Regulations, 2014 (as amended), which prescribes the appeal procedure to be followed. This procedure is summarised in the attached Environmental Authorisation below.

Yours faithfully

Zaahir Toefy

Digitally signed by Zaahir Toefy
Date: 2022.07.27 09:19:24 +02'00'

MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

Copies to: (1) Mr. P. Slabbert / Ms. J. Theron (PHS Consulting) Email: paul@phsconsulting.co.za / jt@phsconsulting.co.za
(2) Ms. N. Duarte (Saldanha Bay Municipality) Email: nazeema.duarte@sbm.gov.za
(3) Ms. C. Ganten-Bein (West Coast District Municipality) Email: cg-bein@wcdm.co.za
(4) Mr. P. Harmse (DEA&DP: Air Quality) Email: Peter.Harmse@westerncape.gov.za
(5) Mr. R. Molale (DFFE: Oceans and Coasts) Email: Rmolale@environment.gov.za

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EIA REFERENCE NUMBER: 16/3/3/1/F4/20/3005/22
NEAS: WCP/EIA/0001033/2022
DATE OF ISSUE: 27 JULY 2022

ENVIRONMENTAL AUTHORISATION

APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED): THE PROPOSED EXPANSION OF THE WEST POINT FISH MEAL PROCESSING PLANT ON ERF 1097, ST HELENA BAY.

With reference to your application for the abovementioned, find below the outcome with respect to this application.

DECISION

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended), the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the listed activities specified in section B below with respect to the Preferred Alternative, described in the Basic Assessment Report ("BAR") dated April 2022.

The applicant for this Environmental Authorisation is required to comply with the conditions set out in section E below.

A. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

The Director
West Point Processors (Pty) Ltd.
P.O. Box 15
ST HELENA BAY
7390

Cell: (082) 551 0217
Email: marthin@saldanha.co.za

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

B. ACTIVITY AUTHORISED

Listed Activity	Activity/Project Description
Listing Notice 1 of the EIA Regulations, 2014, (as amended): Activity Number 19A Activity Description: *"The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from—* *(i) the seashore;* *(ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or* *(iii) the sea; -* *But excluding where such infilling, depositing, dredging, excavation, removal or moving-* *(f) will occur behind a development setback;* *(g) is for maintenance purposes undertaken in accordance with a maintenance management plan;* *(h) falls within the ambit of activity 21 in this Notice, in which case that activity applies;* *(i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or* *Where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies*." Activity Number 34 Activity Description: *"The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution, excluding-* *(i) where the facility, infrastructure, process or activity is included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National*	The proposed extension of the existing pipelines will occur beyond the developed footprint within the sea. The existing Air Emissions License will be amended and the existing Coastal Waters Discharge Permit ("CWDP") will be amended and extended.

Environmental Management: Waste Act, 2008 applies; *(ii) the expansion of existing facilities or infrastructure for the treatment of effluent, wastewater, polluted water or sewage where the capacity will be increased by less than 15 000 cubic metres per day; or* *(iii) the expansion is directly related to aquaculture facilities or infrastructure where the wastewater discharge capacity will be increase by 50 cubic meters or less per day."*	
Activity Number: 38 Activity Description: "The expansion and related operation of facilities for the slaughter of animals where the daily product throughput will be increased by more than- (i) 50 poultry; (ii) 6 units of reptiles, red meat and game; or (iii) 20 000 kg wet weight per annum of fish, crustaceans or amphibians.	The daily throughput capacity of processing fish will increase, but not the per annum throughput.
Activity Number: 52 Activity Description: *"The expansion of structures in the coastal public property where the development footprint will be increased by more than 50 square metres, excluding such expansions within existing ports or harbours where there will be no increase in the development footprint of the port or harbour and excluding activities listed in activity 23 in Listing Notice 3 of 2014, in which case that activity applies."*	The existing outfall and abstraction pipelines will be expanded and upgraded by more than 50 square metres.
Activity Number: 65 Activity Description: *"The expansion and related operation of-* *(i) an anchored platform; or* *(ii) any other structure or infrastructure; On or along the sea bed, where the expansion will constitute an increase development footprint, excluding expansion of facilities, infrastructure or structures for aquaculture purposes."*	The existing outfall and abstraction pipelines will be expanded and upgraded.

The abovementioned list is hereinafter referred to as "the listed activities".

The holder is herein authorised to undertake the following alternative that includes the listed activities relating to the authorised development:

The proposal is to increase the design capacity from the existing 50tph to 120tph of raw fish with an average processing capacity of approximately 100tph raw fish.

The authorised expansion will result in the increase and upgrading of the existing fish holding pits, fish cookers, fish presses, fish master decanters, steam meal driers, separators, oil polishers, fish oil tanks and hammer mills in order to operate and support a 120tph Plant. In addition, the existing fish offloading system/ transport conveyors from the vessels into the plant as well as the fish and meal screw conveyors within the plant itself will be upgraded and expanded. The Waste Heat Evaporating Plant will furthermore be upgraded to support the evaporating capacity from the proposed 120tph plant. Additional seawater and chemical scrubbing will also take place.

The bulk bagging system will be expanded to handle the increased quantities of meal in a shorter time span and additional meal warehouses will be constructed along with a wood chip store (biomass). The Ice Plant will be incorporated into a building of approximately 10m x 15m. The building will have a concrete floor and will be steel frame insulated. A conveyor line (or feeding pipe) will transport the ice onto the fishing vessels. Various upgrades will be undertaken within the cannery facility. The existing office block will be utilized for the proposed plant upgrades mentioned above and therefore a new office block will be constructed in the vicinity of the Clinic and entrance.

A 3x phased approach will be used and a mixture of various boilers will be introduced to increase the steam capacity at the plant. The existing 16T Coal boiler will continue to operate, the existing 10 T capped Coal Boiler will be uncapped to 20 T and an additional 2 x 20T Coal Boilers will be introduced, the existing 11T HFO Boiler will be utilized with the remaining existing HFO boiler (10T) only being used in cases of an Emergency. To be compliant in the initial phases the HFO boilers will run on Low Sulphur Fuel. The conversion of the boilers from coal to biomass can be affected at any given time to reduce the need for coal.

The existing electrical supply will require an additional 2MVA from Eskom and generators will be used as back-up electrical supplies. Alternative energy supply such as additional solar panels on the roofs of building will be introduced over time. The existing freshwater supply required for the proposed upgrades would result in an approx. additional 90 000m^3 of potable water being required for the final phase resulting in construction of two on site Reservoirs (1000m^3 each). The existing General Waste Handling Area will be upgraded to operate more efficiently. Furthermore, additional sea water for condensing will be abstracted and the existing abstraction pipeline will be extended to ensure the coolest and cleanest seawater intake possible. Higher volumes of effluent will also be discharged to sea resulting in the lengthening of Outfall A and B. The onshore inline filtration (or similar technology) of effluent by removal of solids and pollutants prior to discharge will be implemented.

A. ABSTRACTION PIPELINE

As part of the authorised upgrades the abstraction pipeline will be extended to ensure the freshest sea water intake. The existing abstraction pipeline abstracts sea water just off the pier. Two Alternatives were proposed to expand this pipeline. Alternative 1 (U) would abstract sea water further along just off the point of the pier (approx. 100m; 300mm diameter). Alternative 2 (V) would divert the abstraction pipeline away from the harbour activities.

B. 'OUTFALL B' (DISCHARGE PIPELINE)

As part of the proposed upgrades the discharge pipeline, "Outfall B", will be extended further offshore to improve mixing. Simulations were run using a conservative tracer to determine the optimum outfall configuration to maximise dilution potential. Various alternatives were assessed in this regard with the preferred 'Outfall B' Design Alternative being as follows:

- Depth and Length Alternative 2: ± 5.8 m depth and an outfall length of approximately 500m
- Diameter Alternative 2: 200mm
- A diffuser to achieve increased dilution potential for the offshore discharge of Outfall B

Biomass (over coal) and Low Sulphur Oil ("LSO") (over Heavy Fuel Oil ("HFO")) are the preferred environmental alternatives. These preferred technology alternatives do however have higher economic impacts on the Applicant. Coal will still be used during phase 2 and 3 however the Applicant intends to shift from Coal to Biomass, or a combination, by the implementation of phase 4 if biomass can be supplied in a sustainable manner. As indicated in the operational alternatives below, LSO will be used in Phase 2 where 2x HFO boilers will be utilised but not in Phase 3 and 4 where atmospheric emissions are within acceptable limits. LSO has cost implication in the long term but, with regard to Phase 2 A, it is feasible for the short term.

Additional operational alternatives have been considered for Phase 2, i.e., Phase 2A and 2B. For Phase 2A, both HFO boilers may be considered for utilisation of LSO. Based on the dispersion modelling results of the Atmospheric Impact Assessment, the findings of the study were:

Phase 4 or 4A (Maximum Capacity):

- The modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines.
- The 24-hr SO2 concentrations reached the guideline level of 125 µg/m3 on the hill west of the plant and at the sea just north of the plant. However, the guideline exceedances were below the allowed 4 times a year.
- Impact rating: LOW

Phase 2A:

- The modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines.
- The modelling results were based on the HFO boilers utilising LSO and the stack heights of the boilers at 23m.
- Impact rating: LOW

Phase 2B:

- Also, within acceptable air emissions standards. The impact rating would be the same as Phase 2A (LOW), but insufficient steam will be generated and the availability of a 20T boiler within the timeframe.

Phase 3:

- The impacts from this phase are expected to be more than Phase 2 and less than Phase 4, which is considered the 'worst-case' scenario. As such the impact for Phase 3 was not included in the impacts rating as it would fall between the Impact rating for Phase 2 and 4 which are both LOW.

Phase 2A is currently the preferred, however the environmental impacts would be the same for Phase 2A and 2B and therefore either combination of boilers (Phase 2A or 2B) could be utilised by the Applicant in terms of Operational Alternatives, but Phase 2B does not generate enough steam to allow for a feasible operation and the availability of a 20T boiler within the timeframe. Phase 3 and 4 is preferred as per timeline.

C. SITE DESCRIPTION AND LOCATION

The authorised listed activities will be undertaken on Erf 1097, St Helena Bay.

The 21-digit Surveyor General code for the proposed site is:

Erf 1097, St Helena Bay	C04600130000109700000

Site co-ordinates for the proposed site is:

Middle point	32° 46'36.99" South	18° 02'58.34" East

Site co-ordinates for the preferred abstraction pipeline is:

Starting point	32°46'32.00" South	18°03'02.73" East
Middle point	32°46'29.98" South	18°03'03.22" East
End point	32°46'29.69" South	18°03'04.55" East

Site co-ordinates for the preferred discharge pipeline 'Outfall B' is:

Starting point	32°46'30.58" South	18°02'58.88" East
Middle point	32°46'23.45" South	18°03'03.42" East
End point	32°46'15.71" South	18°03'06.94" East

Refer to Annexure 1: Locality Plan and Annexure 2: Site Plan.

The said section of land is hereinafter referred to as "**the site**".

D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

PHS Consulting
c/o Mr. Paul Slabbert / Ms. Jenna Theron
P.O. Box 1752
HERMANUS
7200

Cell.: (028) 312 1734
Email: jenna@phsconsulting.co.za

E. CONDITIONS OF AUTHORISATION

Scope of authorisation

1. The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the Preferred Alternative described in the BAR dated April 2022 on the site described in Section C above.

2. The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority

   This Environmental Authorisation is granted for–
   (a) A period of five (**5**) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and

(b) period of ten (**10**) years, from the date the holder commenced with an authorised listed activity, during which period the authorised listed activities for the construction phase, must be concluded

3. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.

4. Any changes to, or deviations from the scope of the alternatives described in section B above must be approved in writing by the Competent Authority, before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

Written notice to the Competent Authority

5. A minimum of 7 (seven) calendar days' notice, in writing must be given to the Competent Authority before commencement of land clearing activities.

5.1. The notice must make clear reference to the site details and EIA Reference number given above.

5.2. The notice must also include proof of compliance with the following conditions described herein:

Conditions: 5, 6 and 10.

Notification and administration of appeal

6. The holder must in writing, within 14 (fourteen) calendar days of the date of this decision–

6.1. Notify all registered Interested and Affected Parties ("I&APs") of –

6.1.1. the outcome of the application;
6.1.2. the reasons for the decision as included in Annexure 3;
6.1.3. the date of the decision; and
6.1.4. the date when the decision was issued.

6.2. Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below;

6.3. Draw the attention of all registered I&APs to the manner in which they may access the decision;

6.4. Provide the registered I&APs with:

6.4.1. name of the holder (entity) of this Environmental Authorisation,
6.4.2. name of the responsible person for this Environmental Authorisation,
6.4.3. postal address of the holder,
6.4.4. telephonic and fax details of the holder,
6.4.5. e-mail address, if any, of the holder,
7.4.6. the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).

7. The listed activities, including site preparation, must not be commenced with within 20 (twenty) calendar days from the date the holder notifies the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided, i.e., the listed activities, including site preparation, must not be commenced with until the appeal is decided.

Management of activity

8. The Environmental Management Programme ("EMPr") (dated February 2022) and submitted as part of the application for Environmental Authorisation is hereby approved.

9. The EMPr must be included in all contract documentation for all phases of implementation.

Monitoring

10. The holder must appoint a suitably experienced Environmental Control Officer ("ECO") before commencing with land clearing activities to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.

11. A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept at the office of the EA holder of the authorised listed activities and must be made available to any authorised person on request.

12. Access to the site referred to in Section C above must be granted and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see these for the purpose of assessing and/or monitoring compliance with the conditions contained herein.

Auditing

13. In terms of Regulation 34 of the EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Reports must be prepared by an independent person and must contain all the information required in Appendix 7 of the EIA Regulations, 2014 (as amended).

    13.1. The holder must undertake an environmental audit within four (4) months of the commencement of the listed activities and submit an Environmental Audit Report to the Competent Authority within one (1) month of completion of the environmental audit.

    13.2. A final Environmental Audit Report must be submitted to the Competent Authority within six (6) months after the completion of the development phase.

    13.3. Submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.

    13.4. The holder must, within 7 (seven) days of the submission of the Environmental Audit Report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request.

Specific conditions

14. Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.

15. Surface or ground water must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.

16. An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed. Any solid waste must be disposed of at a waste disposal facility licensed in terms of the applicable legislation.

17. Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or unmarked human burials

    A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.

F. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.

2. Non-compliance with a condition of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.

3. If the holder does not commence with the listed activities within the period specified in Condition 2, this Environmental Authorisation shall lapse for that activity, and a new application for Environmental Authorisation must be submitted to the Competent Authority. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be made to the Competent Authority prior to the expiry date of the Environmental Authorisation.

4. An application for amendment of the Environmental Authorisation must be submitted to the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended) must be submitted.

    Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the Competent Authority must only be notified of such changes.

5. The manner and frequency for updating the EMPr is as follows:

    Amendments to the EMPr, must be made in accordance with Regulations 35 to 37 of the EIA Regulations, 2014 (as amended) or any relevant legislation that may be applicable at the time.

G. APPEALS

Appeals must comply with the provisions contained in the National Appeal Regulations, 2014 (as amended).

1. An appellant must –

    1.1. Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and

    1.2. Submit a copy of the appeal to any registered I&APs, any Organ of State with interest in the matter and the decision-maker i.e. the Competent Authority that issued the decision.

2. An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date the holder of the decision sent notification of the decision to the registered I&APs–

    2.1. Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and

    2.2. Submit a copy of the appeal to the holder of the decision, any registered I&AP, any Organ of State with interest in the matter and the decision-maker i.e. the Competent Authority that issued the decision.

3. The holder of the decision (if not the appellant), the decision-maker that issued the decision, the registered I&AP and the Organ of State must submit their responding statements, if any, to the appeal authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.

4. The appeal form/s must be submitted by means of one of the following methods:

    By post: Attention: Mr. M. Venter
    Western Cape Ministry of Local Government, Environmental Affairs and Development Planning
    Private Bag X9186
    CAPE TOWN
    8000

    By facsimile: (021) 483 4174; or

    By hand: Attention: Mr. M. Venter (Tel: 021 483 3721)
    Room 809

    8th Floor Utilitas Building, 1 Dorp Street, Cape Town, 8001

5. The prescribed appeal form, as well as assistance regarding the appeal processes is obtainable from the office of the appeal authority/ at: Tel. (021) 483 3721, E-mail DEADP.Appeals@westerncape.gov.za or URL http://www.westerncape.gov.za/eadp.

H. DISCLAIMER

The Western Cape Government, the holder, committees or any other public authority or organisation appointed in terms of the conditions of this Environmental Authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is greatly appreciated.

Yours faithfully

Zaahir Toefy

Digitally signed by Zaahir Toefy
Date: 2022.07.27 09:19:56 +02'00'

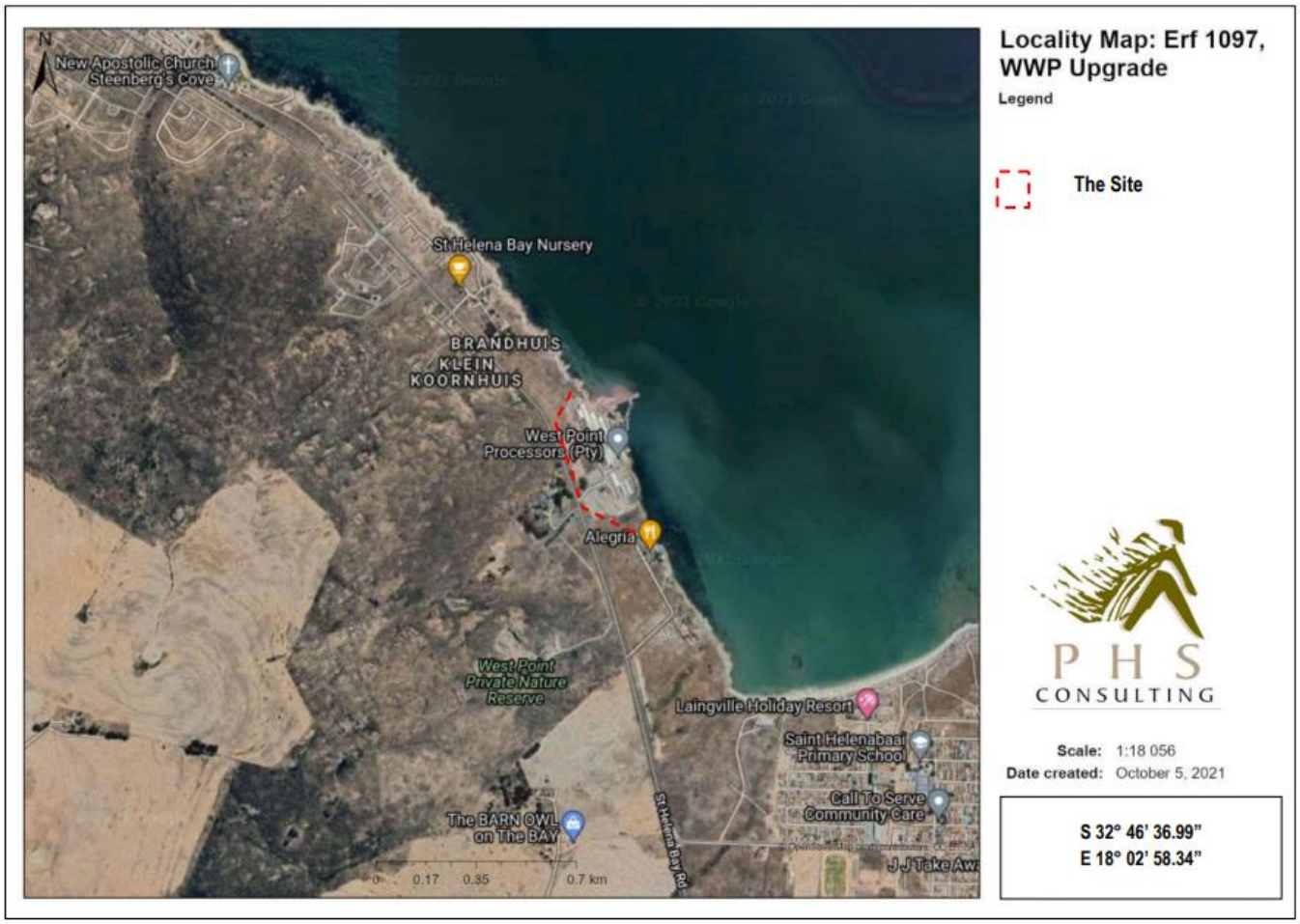
MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

DATE OF DECISION: 27 JULY 2022

Copies to: (1) Mr. P. Slabbert / Ms. J. Theron (PHS Consulting) Email: paul@phsconsulting.co.za / jt@phsconsulting.co.za
(2) Ms. N. Duarte (Saldanha Bay Municipality) Email: nazeema.duarte@sbm.gov.za
(3) Ms. C. Ganten-Bein (West Coast District Municipality) Email: cg-bein@wcdm.co.za
(4) Mr. P. Harmse (DEA&DP: Air Quality) Email: Peter.Harmse@westerncape.gov.za
(5) Mr. R. Molale (DFFE: Oceans and Coasts) Email: Rmolale@environment.gov.za

ANNEXURE 1: LOCALITY MAP

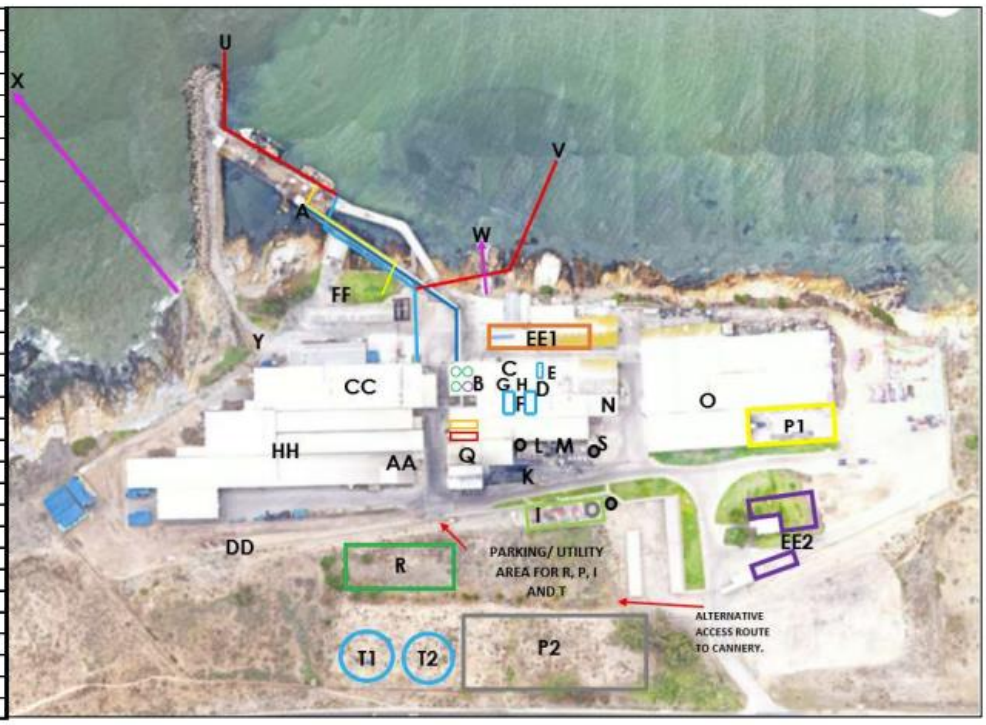
The proposed expansion is demarcated in red below.



ANNEXURE 2: SITE PLAN

Site plan for the proposed development.

LEGEND	
A	Upgrade fish offloading system/ transport conveyors
B	Increase & upgrade fish holding pits
C	Fish cookers
D	Fish presses
E	Fish master decanters
F	Steam meal driers
G	Separators with additional hydraulic throughput
H	Oil polishers
I	Upgrade and increase fish oil tanks capacity
J	Increase fish & meal screw conveyors throughout
K	Waste Heat Evaporating plant
L	Additional Seawater Scrubbing
M	Additional Chemical scrubbing
N	Hammer mills to grind
O	Increase bulk bagging system
P	Additional meal warehouses (1&2)
Q	Various steam supply boilers
R	Woodchip store
S	MVA Eskom Electricity Supply
T	Reservoirs: Municipal Water Storage (1&2)
U	Alternative 1: Extended (red) Abstraction Pipeline
V	Alternative 2: Extended (red) Abstraction Pipeline
W	Extend existing coastal water discharge outfall A
X	Extend existing coastal water discharge outfall B
Y	Inline Treatment prior to discharge
AA	Generators for backup power supply
CC	Alternative energy supply, solar panels etc.
DD	Upgrade of general waste handling area
EE1	Existing office block to be utilised for plant expansion
EE2	New proposed office block
FF	Ice plant & ice conveyor (yellow line)
HH	Cannery Upgrades



ANNEXURE 3: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, inter alia, the following:

a) The information contained in the application form dated and received by the competent authority on 02 February 2022, the BAR dated April 2022 and received by the competent authority on 08 April 2022, the EMPr (dated February 2022) submitted together with the BAR;

b) Relevant information contained in the Departmental information base, including, the Guidelines on Public Participation, Alternatives and Exemptions (dated March 2013);

c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA;

d) The comments received from I&APs and responses to these, included in the BAR dated April 2022;

e) The balancing of negative and positive impacts and proposed mitigation measures; and

f) No site visits were conducted. The competent authority had sufficient information before it to make an informed decision without conducting a site visit.

All information presented to the competent authority was taken into account in the consideration of the application for environmental authorisation. A summary of the issues which, according to the competent authority, were the most significant reasons for the decision, is set out below.

1. Public Participation

The public participation process ("PPP") was undertaken for the pre-application process and in accordance with an approved Public Participation Plan (approved on 28 October 2021) and entailed the following:

- Identification of and engagement with I&APs;
- Fixing a notice board at the site where the listed activities are to be undertaken on 09 November 2021;
- Giving written notice to the owners and occupiers of land adjacent to the site where the listed activities are to be undertaken, the municipality and ward councillor, and the various organs of state having jurisdiction in respect of any aspect of the listed activities on 03 November 2021;
- The placing of a newspaper advertisement in the "*Weslander*" and "*Die Burger*" on 04 November 2021;
- Hard copies of the pre-application draft BAR were circulated to members and attendees at the annual general meeting of the St Helena Bay Water Quality Trust ("SHBWQT") on the 2 November 2021.
- The pre-application draft BAR document was available in the Laingville Library;
- A copy of the pre-application draft Basic Assessment Report (including the draft EMPr, draft Variation Application for an AEL and the draft CWDP renewal application) was made available on the EAP's company website www.phsconsulting.co.za
- Placing the reports on the EAP's website for a minimum 30-day commenting period;
- Making the pre-application draft BAR available to I&APs for comment from 09 November 2021 to 09 December March 2021;
- All comments received during the pre-application phase commenting period were included in the updated Basic Assessment Report to be circulated to registered I&APs, Organs of State and State Departments for a further 30-day commenting period in the statutory process.
- Giving written notice to the owners and occupiers of land adjacent to the site where the listed activities are to be undertaken, the municipality and ward councillor, and the various organs of state having jurisdiction in respect of any aspect of the listed activities on 21 February 2022;
- Making the draft BAR available to I&APs for comment from 22 February 2022 to 25 March 2022.

All of the concerns raised by I&APs were responded to and adequately addressed during the public participation process. This Department is satisfied that the PPP that was followed met the minimum legal requirements and all the comments raised and responses thereto were included in the comments and responses report. Specific management and mitigation measures have been considered in this Environmental Authorisation and in the EMPr to adequately address the concerns raised.

2. Alternatives

Activity, design/layout, operational alternatives and the "No-Go" alternative were identified and assessed as follows:

The preferred alternative (herewith authorised) is therefore as follows:

Activity alternative

The proposed alternative will result in the increase and upgrading of the existing fish holding pits, fish cookers, fish presses, fish master decanters, steam meal driers, separators, oil polishers, fish oil tanks and hammer mills in order to operate and support a 120tph Plant. In addition, the existing fish offloading system/ transport conveyors from the vessels into the plant as well as the fish and meal screw conveyors within the plant itself will be upgraded and expanded. The Waste Heat Evaporating Plant will furthermore be upgraded to support the evaporating capacity from the proposed 120tph plant. Additional seawater and chemical scrubbing will also take place.

The bulk bagging system will be expanded to handle the increased quantities of meal in a shorter time span and additional meal warehouses will be constructed along with a wood chip store (biomass). The Ice Plant will be incorporated into a building of approximately 10m x 15m. The building will have a concrete floor and will be steel frame insulated. A conveyor line (or feeding pipe) will transport the ice onto the fishing vessels. Various upgrades will be undertaken within the cannery facility. The existing office block will be utilized for the proposed plant upgrades mentioned above and therefore a new office block will be constructed in the vicinity of the Clinic and entrance.

A phased approach will be used and a mixture of various boilers will be introduced to increase the steam capacity at the plant. The existing 16T Coal boiler will continue to operate, the existing 10 T capped Coal Boiler will be uncapped to 20 T and an additional 2 x 20T Coal Boilers will be introduced, the existing 11T HFO Boiler will be utilized with the remaining existing HFO boiler (10T) only being used in cases of an Emergency. To be compliant in the initial phases, the HFO boilers will run on Low Sulphur Fuel. The conversion of the boilers from coal to biomass can be affected at any given time to reduce the need for coal.

The existing electrical supply will require an additional 2MVA from Eskom and generators will be used as back-up electrical supplies. Alternative energy supply such as additional solar panels on the roofs of building will be introduced over time. The existing freshwater supply required for the proposed upgrades would result in an approximately additional 90 000m^3 of potable water being required for the final phase resulting in construction of two on site Reservoirs (1000m^3 each). The existing General Waste Handling Area will be upgraded to operate more efficiently. Furthermore, additional sea water for condensing will be abstracted and the existing abstraction pipeline will be extended to ensure the coolest and cleanest seawater intake possible. Higher volumes of effluent will also be discharged to sea resulting in the lengthening of Outfall A and B. The onshore inline filtration (or similar technology) of effluent by removal of solids and pollutants prior to discharge will be implemented.

Design or layout alternative

The reservoirs were initially located within the undeveloped portion of the site indicated by the vacant area to the left of the above image (refer to site plan attached as Annexure 2). However, due to the undeveloped nature of this portion it was decided to place the reservoirs (and any other infrastructure of the proposed upgrades) within the developed/ disturbed areas of the site.

As part of the proposed upgrades the abstraction pipeline needs to be extended to ensure the freshest sea water intake. The existing abstraction pipeline is indicated by the light blue line in Annexure 2 above and abstracts sea water just off the pier. Two Alternatives were proposed to expand this pipeline along the red lines. Alternative 1 (U) would abstract sea water further along (red line) just off the point of the pier (approx. 100m; 300mm diameter). Alternative 2 (V) would divert the abstraction pipeline along the red route away from the harbour activities.

It was founded by the Marine Specialist that Alternative 1 (U) would be the Preferred Alternative. This abstraction point would provide the cleaner and coolest water to the fish processing facility.

As part of the proposed upgrades the discharge pipeline, "Outfall B" (marked 'X' on Annexure 2), will be extended further offshore to improve mixing. Simulations were run using a conservative tracer to determine the optimum outfall configuration to maximise dilution potential. Various alternatives were assessed in this regard:

Three alternatives were assessed by the Marine Specialists with regard to the pipeline depth and length:

- Depth and Length Alternative 1: ± 4.8 m depth and an outfall length of approximately 200m.
- Depth and Length Alternative 2: ± 5.8 m depth and an outfall length of approximately 500m.
- Depth and Length Alternative 3: ± 7 m depth and an outfall length of approximately 700 m.

Simulations were run using a conservative tracer to determine the optimum outfall configuration to maximise dilution potential. All three outfall depth configurations modelled achieve a dilution ratio of at least 12 at the selected 100 m RMZ. There is a 31% improvement in dilution at 800 m offshore compared to 200 m, i.e., the deeper the outfall is positioned, the better the dilution potential. The outfall placed 200 m offshore interacts with the bank at about 300 m from the outfall and may result in the effluent becoming trapped in the sheltered bay downstream of the pier. This will have similar negative impacts on the nearshore marine environment as a shore-based discharge and is strongly discouraged. The costs of construction and limitations of the area available must be taken into account when considering the design of the outfall. The 17% improvement in dilution offered by outfall at 800 m compared to the 500 m outfall can instead be achieved through other means, such as the use of a diffuser and changes in pipe end design. As such, further models were run using a pipeline length of 500 m from shore at 5.8 m depth.

Depth and Length Alternative 2: ± 5.8 m depth and an outfall length of approximately 500m is the Preferred Alternative with regard to the depth and length of the pipeline.

Three alternatives were also assessed by the Marine Specialists with regard to the pipeline diameter:

- Diameter Alternative 1: 300mm (existing diameter)
- Diameter Alternative 2: 200mm
- Diameter Alternative 3: 170mm

Improvements in dilution can also be achieved by changing the outfall "pipe end" diameter. A smaller pipe diameter increases discharge velocity, resulting in improved initial mixing and subsequent improved dilution at the edge of the RMZ, but also produces a longer, narrower plume. Discharge velocities in typical engineering designs may range from 3-8 m/s. Very high velocities may lead to excessive pumping energy requirements. Very low velocities (less than 0.5 m/s) may lead to undesirable sediment accumulation within the discharge pipe. Pipeline diameter scenario results showed that dilution improves with a narrower pipe end at the selected 100 m RMZ. Discharge velocity likewise increased; a 170 mm pipe end diameter results in a discharge velocity of over 8 m/s, which is beyond typical outfall design limits. Therefore, a pipe end dimeter of 200 mm is strongly recommended to improve dilution potential. Further models were run using a pipeline diameter of 200 mm.

Diameter Alternative 2: 200mm is the Preferred Alternative with regard to the diameter of the pipeline.

Furthermore, a single outfall vs. a diffuser outfall was also assessed. Simulations were run using a conservative tracer to determine the difference between a single offshore Outfall B discharge at 5.8 m depth, and an offshore staged diffuser for Outfall B at the same depth. The results show a 60%

improvement in dilution potential with the installation of a 25 m staged diffuser (three 0.2 m openings) aligned perpendicular to the "worst-case" current flowing to the southeast towards the corner of Slippers Bay.

The diffuser results in a wider plume, but also achieves higher dilutions more quickly, with 30 dilutions reached in 12.8 m compared to 227.5 m from the point source. The modelled single point outfall results show a dilution of < 30 at the 100 m RMZ, compared to a dilution of > 70 at the 100 m RMZ with the diffuser.

A diffuser is strongly recommended to achieve increased dilution potential for the offshore discharge of Outfall B.

Technology Alternatives

Biomass versus Coal alternatives were considered.

Biomass is fuel that is developed from organic materials, a renewable and sustainable source of energy used to create electricity or other forms of power. In this case wood chips would be the organic material to substitute Coal. Coal is classified as a non-renewable energy source and is currently being used to fuel most of the boilers on the site. A wood chip store has been provided for in the proposed upgrades at the plant.

Positive and Negative impacts would relate to Atmospheric Emissions. Although the modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines for the proposed upgrades, according to the Atmospheric Impact Assessment, "*when biomass is used to reduce the reliance on coal, the atmospheric impacts are expected to be generally lower than that of coal, especially relating to the SO_2 emissions*."

The Applicant intends to shift from Coal to Biomass, or a combination, when the biomass supply chain can be operated sustainably.

LSO (Low Sulphur Oil) versus HFO (Heavy Fuel Oil) were considered.

HFO (Heavy Fuel Oil) contains an approximate maximum sulphur content of 3.5% whereby LSO (Low Sulphur Oil) has an approximate maximum Sulphur content of 1%. When sulphur is burned, it becomes sulphur dioxide (SO_2) and therefore the higher the sulphur content in the oil the more SO_2 is emitted into the atmosphere. HFO is characterized by an elevated overall toxicity compared to all other fuels.

From a purely economic perspective HFO is reasonably cheaper than LSO, however, the positive/ negative environmental impacts, in this scenario, would once again relate to Atmospheric Emissions. Using LSO would therefore always produce better air quality results when tested against the same quantity of HFO due to its lower Sulphur content.

The Atmospheric Impact Assessment founded that, considering the modelled concentrations due to the plant's emissions and the potential low cumulative impacts, the proposed processing capacity increase should be authorised with the following requirements regarding the LSO versus HFO debate: "*Utilise LSO for Phase 2A, when utilising both HFO boilers*." Alternatively, if two HFO boilers are to be utilised in Phase 4 then only LSO with a maximum sulphur content of not more than 1.5% is to be used. When a singular HFO boiler is running in the other phases it is not a requirement as the air emissions released are within acceptable standards and would be considered to have a LOW impact.

Operational Alternatives

There are currently 5 points sources at the plant. There are two coal boilers stacks, two HFO boilers stacks and one chemical scrubber stack. The proposed expansion will be completed in three phases. Under full capacity, the existing 16-ton Coal Boiler will continue to operate, the existing 10-ton capped Coal Boiler will be uncapped to 20-ton, an additional 2 x 20 -ton Coal Boilers will be introduced and the existing 11-ton HFO Boiler will be utilized with the remaining existing HFO Boiler (10-ton) only being

used in cases of an emergency. It should be noted that the two additional coal boilers are existing ones and were manufactured before 2013. In addition, a second scrubbing system (seawater scrubbing + chemical scrubbing) will be installed.

In terms of boiler utilisation, the existing boilers will still be utilised for Phase 2 (Phase 1 is the existing operations taking place on site within the parameters of the existing authorisations). During Phases 3 and 4, one additional 20-ton coal boiler will be introduced per phase. Once the upgrade is completed, the one HFO boiler will be fully operational and the second HFO boiler will only serve as a backup or be used in an emergency. If two HFO boilers are to be utilised, then only LSO with a maximum sulphur content of not more than 1.5% is to be used.

Additional operational alternatives have been considered for Phase 2, i.e., Phase 2A and 2B. For Phase 2A, both HFO boilers may be considered for utilisation of LSO. Based on the dispersion modelling results of the Atmospheric Impact Assessment, the findings of the study were:

Phase 4 or 4A (Maximum Capacity):

- The modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines.
- The 24-hr SO_2 concentrations reached the guideline level of 125 µg/m^3 on the hill west of the plant and at the sea just north of the plant. However, the guideline exceedances were below the allowed 4 times a year.
- Impact rating: LOW

Phase 2A:

- The modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines.
- The modelling results were based on the HFO boilers utilising LSO and the stack heights of the boilers at 23m.
- Impact rating: LOW

Phase 2B:

- Also, within acceptable air emissions standards. The impact rating would be the same as Phase 2A (LOW), but insufficient steam will be generated and the availability of a 20T boiler within the timeframe.

Phase 3:

- The impacts from this phase are expected to be more than Phase 2 and less than Phase 4, which is considered the 'worst-case' scenario. As such the impact for Phase 3 was not included in the impacts rating as it would fall between the Impact rating for Phase 2 and 4 which are both LOW.

Phase 2A is currently the preferred, however the environmental impacts would be the same for Phase 2A and 2B and therefore either combination of boilers (Phase 2A or 2B) could be utilised by the Applicant in terms of Operational Alternatives, but Phase 2B does not generate enough steam to allow for a feasible operation and the availability of a 20T boiler within the timeframe. Phase 3 and 4 is preferred as per timeline.

"No-Go" Alternative

The "No-Go" alternative would result in maintaining the "status quo". The 'No-Go 'option will result in the status quo of the property being maintained. The existing design capacity of the West Point Fish Meal plant is 50tph of raw fish and the Applicant can continue to operate the facility in line with the existing EA (2010), CWDP (2017), and AEL (2019) which was granted to WPP. However, since the preferred alternative will not result in unacceptable environmental impacts, the "No-Go" alternative was not deemed the preferred.

3. Impact Assessment and Mitigation measures

3.1. Activity Need and Desirability

The subject property is located within the Urban Area of St Helena Bay situated on the West Coast of South Africa. The site is zoned for Industrial use (Fishing Industry Zone) and has been in operation as a Fish Processing Plant since 1948. According to the Saldanha Bay Municipal Spatial Development Framework (2019) the site is earmarked as General Industry. The subject property is located in the fishing community of St. Helena Bay with the fishing industry being a predominant economic opportunity within the area. The activities are therefore not only in keeping with the activities being undertaken within the site, but are in keeping with the surrounding land use of the area. According to the St Helena Bay Zoning Map the site (east of the Main Road) is earmarked as "Fishing Industry". This is confirmed in various planning documentation including the Saldanha Bay Municipal Spatial Development Framework (2019) which indicated the portion of the site to the East of the Main Road as Urban development and not withing the Protected Area (Core 1a) demarcation to the west.

In terms of the Environmental Management Framework ("EMF") for the Greater Saldanha Area (2021), numerous mitigation measures have been proposed by the Marine and Air Quality Specialists which comply with the EMF.

3.2. Ecological Impacts

According to the SANBI vegetation map (2012) the site historically consists of Saldanha Granite Strandveld which is an ENDANGERED vegetation type. However, the majority of the site is developed and the portion of the site on which some of the proposed expansion infrastructure will fall was also developed up until 2018 (topsoil lawfully disturbed during the preceding 10 years). This area consisted of residential dwellings and gardens up until 2018 after which the residential dwellings were demolished as the residential component was not compatible with the industrial nature of the facility. No indigenous vegetation will therefore be disturbed within the building envelope proposed by the expansion activities.

Furthermore, according to CSIR Wetland Freshwater Priority Areas (FEPAs) and the National Geo-spatial Information (DRDLR) there are no wetlands or watercourses located on site.

According to the Western Cape Biodiversity Spatial Plan 2017: Critical Biodiversity Areas (CBAs) & Environmental Support Areas (ESAs) the site does not fall within any CBAs or ESAs. However, according to the Western Cape Biodiversity Spatial Plan 2017: Protected Areas the site falls within a Protected Area. The site is located within what is indicated to be the West Point Private Nature Reserve which is earmarked by default as a Protected Area when NEM:BA came into effect. The Protected Area status given to the WPP Fish Factory site relates to the voluntary declaration of a Private Nature Reserve in terms of Section 12 the Nature Conservation Ordinance, 1974. The proclamation was intended for the remaining natural areas on the site south of the Main Road. It does not apply to the industrial operation operating since 1948 and that erf is zoned Fishing Industry Zoning. This is confirmed in various planning documentation including the Saldanha Bay Municipal Spatial Development Framework which indicated the portion of the site to the East of the Main Road as Urban development and not withing the Protected Area (Core 1a) demarcation to the west.

In terms of the DEA Screening Tool the relative animal species theme sensitivity is in fact LOW for the majority of the site. Furthermore, the site is largely developed, located within the Urban Edge and is earmarked and zoned for 'Fishing Industry' purposes. Due to the nature of the activities undertaken on site and in accordance with the existing environmental authorizations the site is completely fenced (except for the small part accessing the harbour and the large parking area for visitors/ employees to utilize) and security access is strictly controlled. Furthermore, a vibracrete wall with wire on top runs along the western side of the property from the sea up to the Main Road and along the Main Road up until the access to WPP.

Cape Nature indicated in the electronic mail correspondence dated 07 December 2021, that the conclusions of the site sensitivity verification report regarding plant, aquatic, animal and terrestrial biodiversity sensitivities are accepted.

3.3. Marine impacts

A Marine Ecology Impact Assessment (compiled by Anchor Environmental Consultants and dated 2021) was undertaken and identified a total of twelve potential environmental impacts which were assessed, both construction impacts (loss of habitat, disturbance to and/or mortality of marine life due to construction activities associated with installation of the intake and discharge pipelines) and operational impacts (disturbance to and/or mortality of marine life due to the intake of seawater and discharge of effluent into the marine environment). Of these twelve identified impacts, one was rated as 'insignificant' and does not require mitigation, four were rated as 'very low' before mitigation (of these, three were rated 'insignificant' after mitigation, and one remained at 'very low' significance). Three impacts were rated 'low' (rated 'very low' after mitigation). Four impacts were rated as 'high', and implementation of mitigation measures is expected to reduce this rating to 'medium' or 'low' significance. The "zone of impact" where cumulative impacts may be of concern has been defined by the dispersion modelling results and by environmental monitoring. Cumulative impacts are considered 'insignificant' after mitigation.

The "zone of impact" where cumulative impacts may be of concern has been defined by the dispersion modelling results and by environmental monitoring. Under the worst-case scenario, the zone of impact extents some 1.5 km offshore, and up to 2.5 km alongshore. Cumulative impacts are only of concern within this area; anthropogenic disturbances outside this zone of impact have no influence on the extent or significance rating of the impact and are therefore not relent to this assessment. There are no other fish factory farm discharges within his "zone of impact"; and there is little to no evidence of nutrient enrichment of the sediment in the vicinity of the nearest Waste Water Treatment Works. As such, it is considered unlikely that there will be significant interaction between these nutrient sources, especially if the recommended mitigation measures for the West Point outfalls are implemented. Cumulative impacts are therefore considered 'insignificant' after mitigation.

The specialist concluded that the proposed development proceed with the implementation of strict environmentally responsible practices. The recommendations of the specialist have been included in the EMPr.

3.4. Air Quality Impacts

An Atmospheric Impact Assessment (compiled by DDA Environmental Engineers cc and dated March 2022) was undertaken to investigate the impacts the proposed expansion will have on the environment.

There are currently 5 points sources at the plant. There are two coal boilers stacks, two HFO boilers stacks and one chemical scrubber stack. The proposed expansion will be completed in 4 stages. Under full capacity, the existing 16-ton Coal Boiler will continue to operate, the existing 10-ton capped Coal Boiler will be uncapped to 20-ton, an additional 2 x 20 -ton Coal Boilers will be introduced and the existing 11-ton HFO Boiler will be utilized with the remaining existing HFO Boiler (10-ton) only being used in cases of an emergency.

In terms of boiler utilisation, the existing boilers will be utilised for Phase 2. During Phases 3 and 4, one additional 20-ton coal boiler will be introduced per phase. Once the upgrade is completed, the one HFO boiler will be fully operational and the second HFO boiler will only serve as a backup or be used in an emergency.

The "worst-case" scenario in terms of boiler utilisation is Phase 4, which entails the simultaneous operation of 4 coal boilers plus the one HFO boiler. For the dispersion modelling, two scenarios

were examined. These were Phase 4 for the future maximum production capacity, as the "worst-case" scenario and Phase 2A, in order to examine the use of the two HFO boilers with lower sulphur HFO. For the estimation of the SO_2 emissions for this fuel, the maximum Sulphur content of 1.5% was used in the calculations of the emission rate for the HFO boilers.

A Phase 4A was also modelled in which all the boilers in Phase 4 will be utilised as well as the second HFO Boiler. If two HFO boilers are to be utilised in Phase 4, then only LSO with a maximum sulphur content of not more than 1.5% is to be used.

Based on the dispersion modelling results of the Atmospheric Impact Assessment, the findings of the study were:

Phase 4 or 4A (Maximum Capacity): Impact rating - LOW
- The modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines.
- The 24-hr SO2 concentrations reached the guideline level of 125 µg/m^3 on the hill west of the plant and at the sea just north of the plant. However, the guideline exceedances were below the allowed 4 times a year.

Phase 2A: Impact rating -LOW
- The modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines.
- The modelling results were based on the HFO boilers utilising LSO and the stack heights of the boilers at 23m.

Phase 2B: Impact Rating - LOW
- Also, within acceptable air emissions standards. The impact rating would be the same as Phase 2A (LOW). However not preferred due to steam generation capacity and the availability of a 20T boiler within the timeframe.

Phase 3: Impact Rating - LOW
- The impacts from this phase are expected to be more than Phase 2 and less than Phase 4, which is considered the 'worst-case' scenario. As such the impact for Phase 3 was not included in the impacts rating as it would fall between the Impact rating for Phase 2 and 4 which are both LOW.

According to the specialist, West Point is located more than 4.5 km away from another emission source (fishmeal plant) and the worst air quality impacts occur near the sources (less than 3 km), the cumulative impact due to the emissions from West Point is considered low to insignificant. Operational activities due to the proposed expansion at West Point Fishmeal Plant would result in a negative direct impact on the ambient air quality in the immediate area around the plant however this impact would be LOW, prior to mitigation, for ALL phases.

When biomass is used to reduce the reliance on coal, the atmospheric impacts are expected to be generally lower than that of coal, especially relating to the SO_2 emissions.

Considering the modelled concentrations due to the plant's emissions and the potential low cumulative impacts, the specialist recommend that the proposed processing capacity increase should be authorised with the following requirements:

Utilise LSO for Phase 2A, when utilising both HFO boilers. Increase the PS2 stack height to 23 m, and for Phases 3 and 4 utilise only one HFO boiler with normal HFO fuel.

This Department's Directorate: Air Quality Management ("D:AQM") indicated in their correspondence dated 30 March 2022, that after reviewing the draft Basic Assessment Report, the D: AQM notes that all concerns that was raised by the Directorate (in their correspondence dated 03 December 2021) have been addressed adequately.

3.5. Noise Impacts

Potential noise impacts are anticipated during the development phase. The potential noise impacts are anticipated to be of very low negative significance with mitigation. Mitigation measures to reduce the potential noise impacts have been included in the EMPr.

3.6. Services

Saldanha Bay Municipality (in correspondence dated 18 January 2022 and16 February 2022) have confirmed that the provision of additional services will be provided by the Municipality for the proposed expansion and is confirmed as follows:

- Sufficient potable water is available to service the proposed expansion.
- In terms of solid waste removal, the facility will be serviced on a weekly basis on Mondays and Thursdays.

Eskom (in correspondence dated 30 November 2021) have confirmed that they have sufficient capacity to supply the proposed expansion with an additional 2 MVA to a total load of 4.5 MVA.

The development will result in both negative and positive impacts.

Negative Impacts include:

- Potential disturbance to marine ecology;
- Potential air quality impacts;
- Potential dust impacts; and
- Potential noise impacts during construction phase.

Positive impacts include:

- Improved plant efficiency;
- Improved dilution potential from discharge pipeline; and
- The creation of some employment opportunities.

4. National Environmental Management Act Principles

The National Environmental Management Principles (set out in section 2 of the NEMA, which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), inter alia, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures; and
- the selection of the best practicable environmental option.

5. Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, the Competent Authority is satisfied that the proposed listed activities will not conflict with the general objectives of integrated environmental

management stipulated in Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and that any potentially detrimental environmental impacts resulting from the listed activities can be mitigated to acceptable levels.

You are reminded of your general duty of care towards the environment in terms of Section 28(1) of the NEMA which states: "*Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment*."

----------END----------