SITE SENSITIVITY VERFICATION REPORT

WEST POINT FISH PROCESSING PLANT, ERF 1097, ST HELENA BAY, WESTERN CAPE

AUGUST 2026

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1. INTRODUCTION:

Erf 1097 ("the site") is situated in St Helena Bay, Western Cape. The site is zoned *Fishing Industry Zone*. The site is approximately 6.89 hectares in extent. The One Environmental System will be used to obtain the various authorizations required in terms of NEMA, NEM: AQA (Amended Air Emissions License) and the ICMA (Coastal Waters Discharge Permit). The Part 2 Amendment Application entails:

1. An increase in the municipal water reservoirs (including associated infrastructure such as foundations, pumps, valves, pipework, tie-ins, telemetry, access and maintenance infrastructure).
2. The addition of cold storage facilities (including associated refrigeration plant, insulated structures, loading/offloading areas, drainage, electrical supply, backup power, fire protection and related safety infrastructure).
3. Combination of Outfall A and Outfall B: Allow for the consolidation of the two discharge pipelines into a single discharge system, with the combined discharge being routed through Outfall B.

The Department of Environmental Affairs' web-based National Environmental Screening Tool allows for the generation of a Screening Tool Report which is required, in terms of Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended, to accompany any application for Environmental Authorisation. The Screening Tool identifies potential environmental sensitivities on the site in terms of 'Environmental Themes' (categorized as low, medium, high and very high) and makes Specialist Impact Assessment recommendations. The outcome of the Screening Tool is to be verified by the EAP in the form of a Site Sensitivity Report.

The "*Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation [EA]"* as published in Government Notice (GN) No. 320 of 20 March 2020 should be applied when considering various specialist input as part of the EA application for a proposed development. GN No. 320, sets out the requirements for a Site Sensitivity Verification Report particularly where a specific specialist assessment has not been prescribed an individual protocol. The current use of the land and the environmental sensitivity of the site identified by the Screening Tool must be confirmed by undertaking a site sensitivity verification, to be carried out by an environmental assessment practitioner or specialist. Furthermore, Government Notice No. 1150 was published on the 30 October 2020 which added two additional themes to the environmental themes list in Government Notice 320.

2. FINDINGS:

The Screening Tool Report (**Appendix A**) identified the following for consideration

- Possible incentive, restriction, or prohibition
  - Strategic Transmission Corridor (Western corridor)
  - South African Protected Areas – West Point Private Nature Reserve
  - South African Conservation Areas – Cape West Coast Biosphere Reserve

- Environmental attributes/features on the site which will be sensitive to development:
  - Agriculture Theme (High Sensitivity)
  - Animal Species Theme (High Sensitivity)
  - Aquatic Biodiversity Theme (Low Sensitivity)
  - Archaeological and Cultural Heritage Theme (Low Sensitivity)
  - Civil Aviation Theme (High Sensitivity)
  - Defense Theme (Medium Sensitivity)
  - Plant Species Theme (High Sensitivity)
  - Terrestrial Biodiversity Theme (Very High Sensitivity)

- Possible specialist studies identified:
  - Agricultural Impact Assessment
  - Archaeological and Cultural Heritage Impact Assessment
  - Paleontology Impact Assessment
  - Terrestrial Biodiversity Impact Assessment
  - Aquatic Biodiversity Impact Assessment
  - Marine Impact Assessment
  - Noise Impact Assessment
  - Traffic Impact Assessment
  - Health Impact Assessment
  - Socio-Economic Assessment
  - Ambient Air Quality Impact Assessment
  - Air Quality Impact Assessment
  - Plant Species Assessment
  - Animal Species Assessment

3. CONTENTS & METHODOLOGY:

The applicable protocols or minimum information requirements, which were published in Government Notice No. 320 of 20 March 2020 (Government Gazette No. 43110 of 20 March 2020 refers), which came into effect on 9 May 2020, must be applied to the impact assessment process that must be followed. *"The site sensitivity verification must be undertaken through the use of:*

a) *A desk top analysis, using satellite imagery;*
b) *A preliminary on-site inspection; and*
c) *Any other available and relevant information."*

Furthermore, *"the outcome of the site sensitivity verification must be recorded in the form of a report that –*

a) *Confirms or disputes the current use of land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.*
b) *Contains motivation and evidence (e.g. photographs) of either verified or different use of either the verified or different use of the land and environmental sensitivity; and*
c) *Is submitted together with the relevant assessment report prepared in accordance with the requirements of the EIA Regulations."*

The EAP has undertaken numerous site visits on Erf 1097 and is very familiar with the environmental sensitivities of the site. The EAP has consulted various spatial planning documents (regional and local) as well as available GIS information (i.e. Cape Farm Mapper, Coastal Viewer etc.). Furthermore, the Marine Impact Assessment undertaken by *Anchor Environmental* was also consulted.

This specialist Impact Assessments will be included in the Part 2 Amendment Report, however the baseline assessment works conducted by the specialists informed this report.

4. INCENTIVE, RESTRICTION OR PROHIBITION

The site is located within the Cape West Coast Biosphere Reserve (**Figure 1**). It appears that Erf 1097 falls within the 'buffer zone'. This aspect has no direct implications for the proposed activities as the site to the east of the Main Road is largely developed and all expansion related activities will remain within this existing fish processing facility footprint. Furthermore, 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 (**Figure 2**) 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*. Please refer to the Zoning Certificate for Erf 1097 (**Annexure B**). 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 (**Figure 3**).

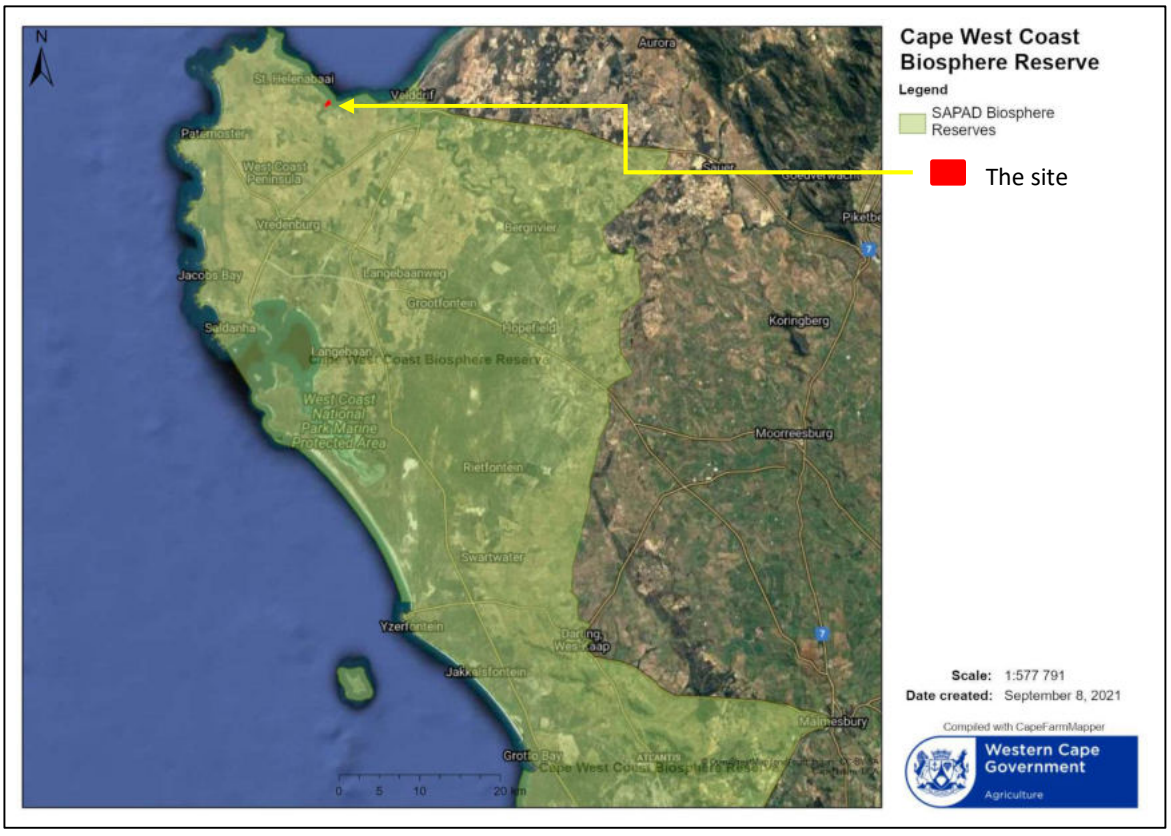


Figure 1: *The site (red – indicated by the arrow) in relation to the Cape West Coast Biosphere Reserve.*

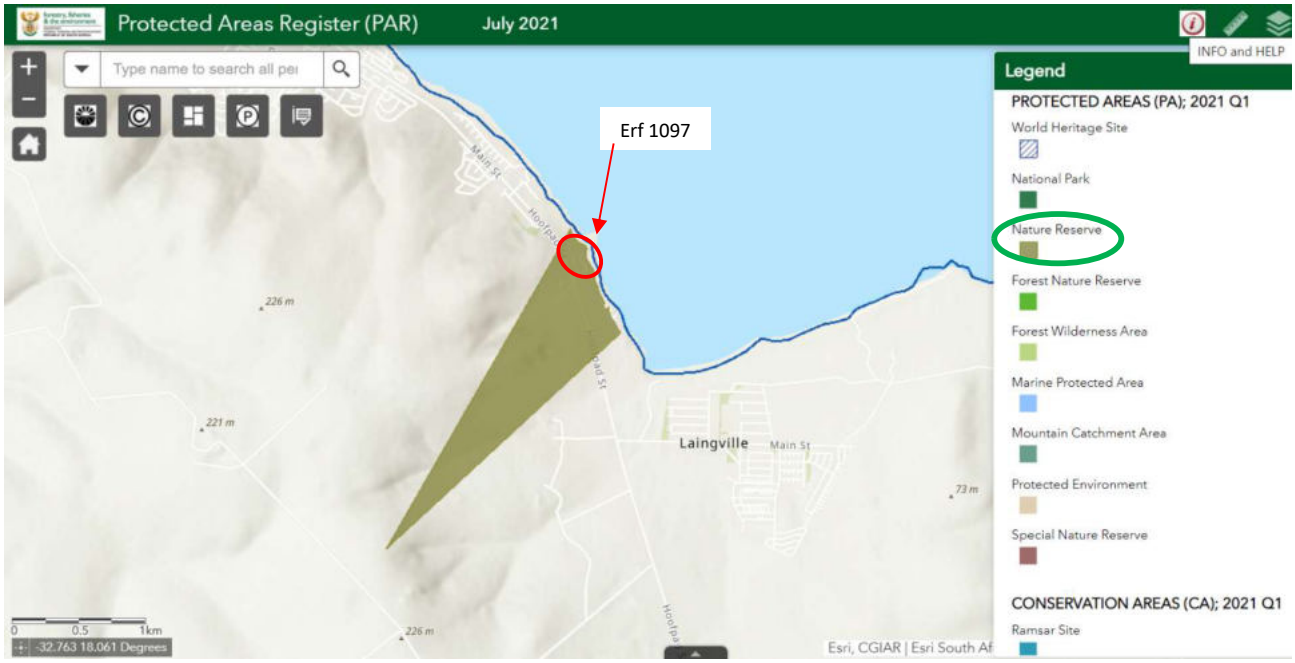


Figure 2: *Protected Areas Register showing Erf 1097 with a Nature Reserve.*

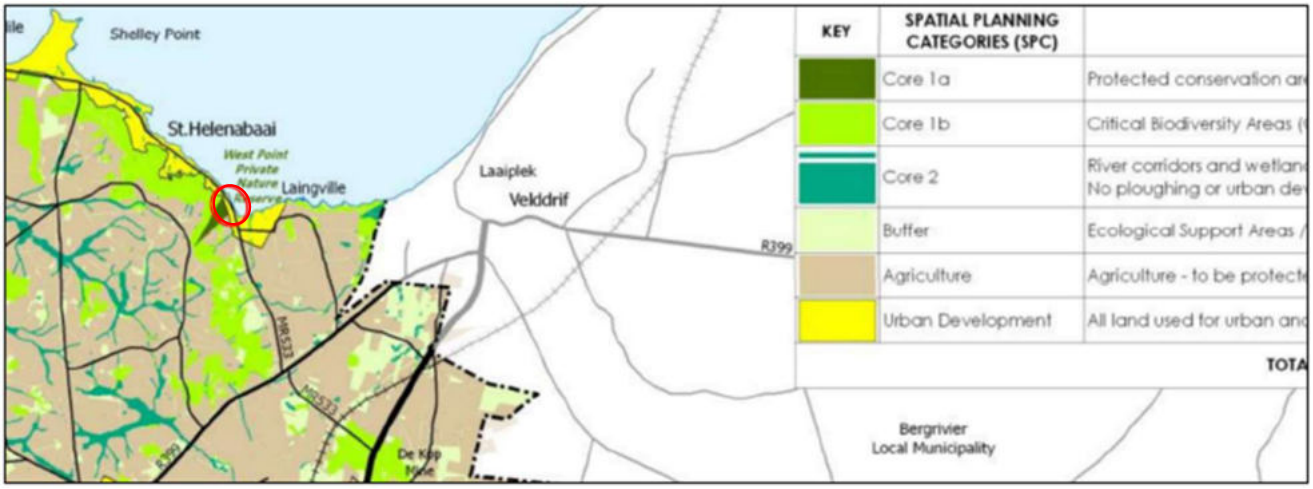


Figure 3: *Saldanha Bay Municipal Spatial Planning Categories – indicates the site (within red circle) as outside the 'Protected Conservation Area' (Core 1a) and indicates the site as 'Urban Development'.*

5. ENVIRONMENTAL THEMES:

St Helena Bay was the center of the pelagic fishing industry when it began in the 1940s and has been an important part of the West Coast lobster fishing grounds. The bay still functions as a major node for industrial and small-scale fisheries on the west coast. Indeed, the fishing industry is the mainstay of St Helena Bay with the bulk of South Africa's small pelagic fish production and processing being conducted in the St Helena Bay factories. The factories in the bay produce a variety of products including tinned fish, fresh and frozen hake, fishmeal, and live crayfish for export. Other industries located around the periphery of the bay include mariculture, ship repair and shipbuilding.

Erf 1097 is located within the Urban Area of St Helena Bay. The site is zoned for 'Fishing Industry' use and has been in operation as a Fish Processing Plant since 1948. According to the Spatial Development Framework the site is earmarked as General Industry (**Figure 4**). As mentioned, the site is 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" (**Annexure C**).



Figure 4: *The site within the context of the SDF earmarked as "General Industry".*

The West Point Processors (WPP) fish processing plant has been operating since 1948 and Environmental Authorisation (EA) was granted in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) on the 22 November 2010 for proposed upgrades that ultimately resulted in a reduction in air

and odour emissions released from the fish processing plant with the intention that the facility operates more efficiently. In compliance with the EA a Coastal Waters Discharged Permit (CWDP) was applied for and granted to WPP in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act no.24 of 2008). Two separate discharge pipelines release effluent from the plant into the sea. An Atmospheric Emissions Licence (AEL) was also issued to WPP. Numerous Environmental Authorisations and Amendments have been undertaken since. The site is therefore developed (refer to **Figure 5** and **Figure 9**).



Figure 5: *Aerial Image indicating the existing layout of the site and the approximate site boundary (red).*

The following environmental themes and associated sensitivities have been identified by the screening tool and will be confirmed or disputed below (**Appendix A**):

5.1 Agriculture – High Sensitivity

The Screening Tool states incorrectly that the site has a High Sensitivity however as clearly depicted in **Figure 6** the site has a LOW sensitivity. The agricultural protocol states that *"Low sensitivity areas are likely to be non-arable land and is therefore land onto which most development should be steered."* As indicated above the site is already developed and the nature of the activity revolves around upgrades and additions to the existing Industry facility. The site is located inside the Urban Edge and is earmarked, zoned and utilised for 'Industrial Fishing' purposes. The site is clearly not suitable for Agriculture and therefore the Agricultural Theme has no relevance to the application.

The Agricultural Sensitivity in terms of the sites land capability is considered **negligible**.

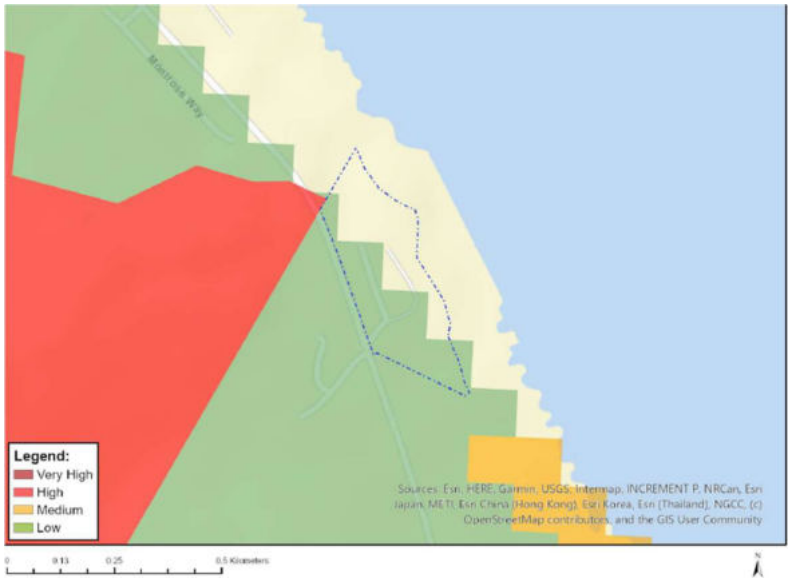


Figure 6: *Agriculture sensitivity theme of the site (dotted area). The majority of the site is in fact rated LOW.*

5.2 Animal Species - High Sensitivity

In addition to Government Notice No. 320 (published on the 20 March 2020) an additional notice, Government Notice No. 1150 was published on the 30 October 2020 identifying two additional themes: Terrestrial animal species and Terrestrial plant species.

The DEA Screening Tool automatically selects the highest rating identified on site as being applicable to the project as a whole (in this instance its 'High'). It must be noted however that the site consists of mostly a Medium rating for the Animal Species Theme (**Figure 7**). As described directly under *Section 5*

above, the site is largely developed, located within the Urban Edge and is earmarked, zoned and being utilized for Fishing Industrial purposes. The proposed expansion is on previously disturbed, and factory related operational areas with no greenfield areas being involved. Furthermore, 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 harbor and the large parking area) (**Figure 9**) and security access is strictly controlled. Furthermore, a 6 feet high 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 from the Main Road (**Figure 8**).

The Animal Species Sensitivity in terms of the site is therefore considered **negligible**.

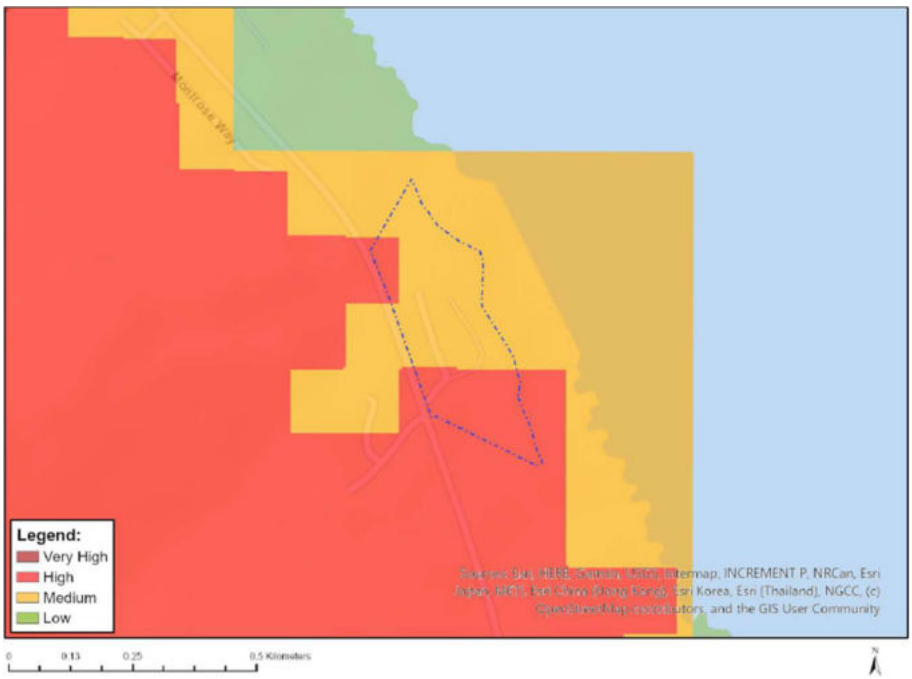


Figure 7: *Animal species sensitivity theme of the site (dotted area). The majority of the site is rated Medium.*



Figure 8: *Image from Google Earth Streetscape showing the 6ft high vibacrete wall that runs along the western portion of the site.*



Figure 9: *Indicating the existing fence (red line) and vibacrete wall (blue line) surrounding the Fish Processing Facility on Erf 1097 and the security-controlled access (yellow star).*

5.3 Aquatic Biodiversity – Low Sensitivity

The site has been identified as being of "low sensitivity" for aquatic biodiversity on the national web based environmental screening tool. This is the lowest sensitivity rating. According to CAPE FARM MAPPER there are no water resources within the site and a site visit has confirmed this.

The site is situated along the coast and therefore a Marine Impact Assessment will address the marine aquatic environment. The Aquatic Biodiversity Sensitivity in terms of the site is therefore considered **negligible**.

5.4 Archaeological and Cultural Heritage – Low Sensitivity

The Archaeological and Cultural Heritage Sensitivity in terms of the Screening Tool is indicated as LOW. As indicated above the site is already developed and the nature of the activity revolves around upgrades and additions to the existing facility. The site is located inside the Urban Edge, is earmarked and zoned for Industrial purposes and the proposed upgrades are in keeping with the existing and historical sense of place of St Helena Bay. No impacts would result from the proposed activity on any archaeological or cultural heritage resources and the National Heritage Resources Act will not be triggered as such a NID to HWC is not required. The Vasco da Gama freshwater pit exist on the site, but it is fenced and regarded as a no-go zone. No development is intended adjacent or within close vicinity to this site.

The Archaeological and Cultural Heritage Sensitivity in terms of the site and the proposed upgrades are therefore considered **negligible**.

5.5 Civil Aviation – High Sensitivity

An applicant intending to undertake an activity for which a specialist assessment has been identified on the screening tool on a site identified as being of "very high ", "high" or "medium" sensitivity for civil aviation, must submit Civil Aviation Compliance Statement. However, on a site where the information gathered from the site sensitivity verification differs from the designation of "very high ", "high" or "medium" sensitivity on the screening tool and it is found to be of a "low" sensitivity, no further assessment requirements are identified.

According to Cape Farm Mapper, there is only one airstrip within a 20 km radius from the site which is located at Stompneus Village just under 10km from the site (**Figure 10**). Furthermore, the closest South African Airforce base is located at Langebaan (Air Force Base Langebaanweg). This base is home to the SAAF's flying school as well as playing host to visiting squadrons on air/air and air/ground exercises. The site is located approximately 23km northwest of this Air Force base.

The WPP fish processing plant has been operating since 1948 and various Environmental Authorisations (EAs) for the proposed upgrades, a Coastal Waters Discharge Permit (CWDP), and an Atmospheric

Emissions Licence (AEL) was granted to WPP. The height of the highest existing stack is 31m (above ground level) and this maximum stack height will not be exceeded. Aviation operators are logically aware of the fish factory in the area and the associated stack heights, considering that the expansion infrastructure has no impact on the stack heights, it poses no risk from an aviation point of view.

As mentioned in Section 5 above Erf 1097 is located within the Urban Area of St Helena Bay and the site is zoned for Fishing Industrial use and has been in operation as a Fish Processing Plant since 1948. The site is located in the long existing 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 within the area. The site on which the proposed activity will be located is already developed, and the nature of the activity revolves around upgrades and additions to the existing facility. The proposed upgrades to the existing facility will not impact on civil aviation.

The Civil Aviation Sensitivity in terms of the site and in relation to the proposed activities are therefore considered **LOW**.

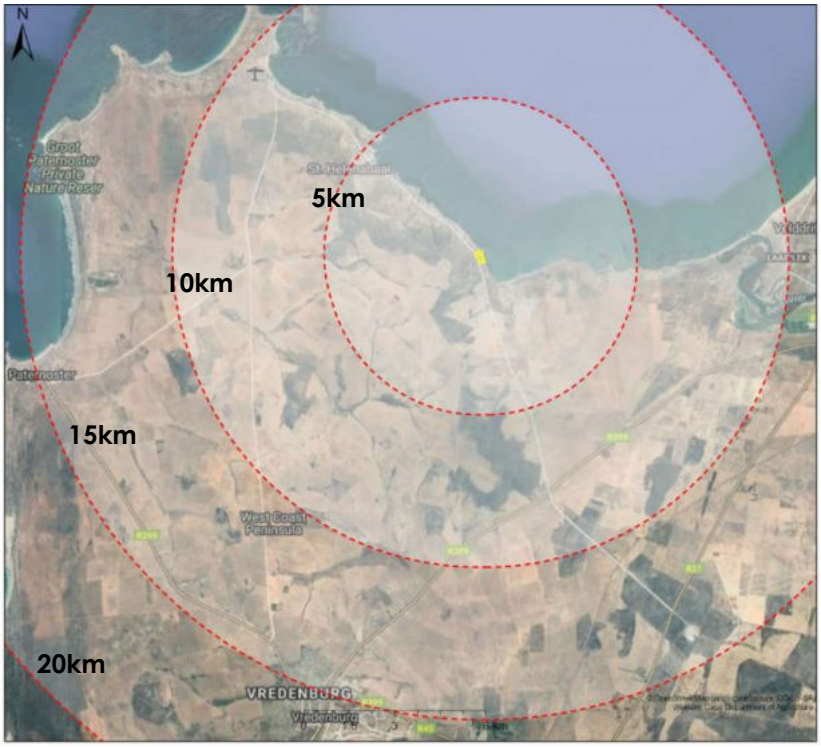


Figure 10: *Existing airstrips within a 20km radius from the site (yellow area).*

5.6 Plant Species – High Sensitivity

In addition to Government Notice No. 320 (published on the 20 March 2020) an additional notice, Government Notice No. 1150 was published on the 30 October 2020 identifying two additional themes: Terrestrial animal species and Terrestrial plant species.

When considering the definitions for 'low' and 'High' (below) for plant species sensitivities it is clear that the sensitivity of the site for plant species is LOW, in terms of the applicable protocol, and not high as the activities will take place on areas where no natural habitat remains.

HIGH SENSITIVITY RATING – for terrestrial plant species:
1. Confirmed habitat for SCC.
2. SCC listed on the IUCN Red List of Threatened Species or South Africa's National Red List website as Critically Endangered, Endangered or Vulnerable according the IUCN Red List 3.1. Categories and Criteria. These areas are unsuitable for development due to a very likely impact on SCC.

LOW SENSITIVITY RATING – for terrestrial plant species:
1. Areas where no natural habitat remains.
2. Natural areas where there is no suspected occurrence of SCC.

As mentioned above, Erf 1097 is located within the Urban Area of St Helena Bay and the site is zoned for Industrial use and has been in operation as a Fish Processing Plant since 1948. The site is located in the long existing 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 within the area. Furthermore, the WPP fish processing plant has been operating since 1948 and Environmental Authorisations (EAs) for proposed upgrades, a Coastal Waters Discharge Permit (CWDP), and an Atmospheric Emissions Licence (AEL) was granted to WPP.

According to the vegetation map the site historically consists of Saldanha Granite Strandveld which is an ENDANGERED vegetation type. However, the majority of the site is developed and the remaining 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 (**Figure 9**). No indigenous vegetation will therefore be disturbed within the building envelope proposed by the expansion activities.

The Plant Species Sensitivity in terms of the site and the proposed activities is therefore considered **negligible**.

5.7 Defence – Medium Sensitivity

In accordance with the "*Protocol for the specialist assessment and minimum report content requirements for environmental impacts on defence installations*" an applicant intending to undertake an activity for which a specialist assessment has been identified on the screening tool, on a site identified as being of "medium" sensitivity for defence, must submit a Defence Compliance Statement. On a site where the information gathered from the site sensitivity verification differs from the designation of "medium" sensitivity on the screening tool and it is found to be of a "low" sensitivity, no further assessment requirements are identified.

As indicated above the site is already developed and the nature of the activity revolves around upgrades and additions to the existing facility. The site is located inside the Urban Edge and is earmarked and zoned for Industrial Fishing purposes. It was confirmed through a site visit, satellite imagery, and spatial planning documentation that no defense infrastructure will directly or indirectly be affected by the proposed development. While the Air Force Base Langebaanweg is a military facility. The site is located approximately 23km northwest of this Air Force base and would have no negative impact on the facility. The CAA will be included as an I&AP in this regard.

As no negative impacts on any defence installations are expected, this theme does not apply further to the application and is considered **Negligible**.

5.8 Terrestrial Biodiversity – Very High Sensitivity

According to the vegetation map the site historically consists of Saldanha Granite Strandveld which is an ENDANGERED vegetation type. However, the majority of the site is developed and the remaining 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 (**Figure 9**). No indigenous vegetation will therefore be disturbed within the building envelope proposed by the expansion activities.

As mentioned above (Section 5), Erf 1097 is located within the Urban Area of St Helena Bay and the site is zoned for Industrial use and has been in operation as a Fish Processing Plant since 1948. The site is located in the long existing 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 within the area. Furthermore, the WPP fish processing plant has been operating since 1948 and Environmental Authorisations (EAs) for proposed upgrades, a Coastal Waters Discharge Permit (CWDP), and an Atmospheric Emissions Licence (AEL) have all been granted to WPP.

The site is already developed, and the nature of the activity revolves around upgrades and additions to the existing facility. The Terrestrial Biodiversity Sensitivity in terms of the site and the proposed activities is therefore considered **negligible**.

6. SPECIALIST STUDIES:

The specialist studies below are recommended by the screening tool. This section also includes a motivation for complying/ not complying with the recommendations. This section is to be read in conjunction with the 'Environmental Themes' section above.

6.1 Agricultural Impact Assessment

Erf 1097 is located within the Urban Area of St Helena Bay, is zoned for Fishing Industry use and has been in operation as a Fish Processing Plant since 1948. According to the Spatial Development Framework the site is earmarked as General Industry. According to the St Helena Bay Zoning Map the site (east of the Main Road) is earmarked as "Fishing Industry". The site is located in the long existing 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 and sense of place within the area.

As indicated above the site is already developed and the nature of the activity revolves around upgrades and additions to the existing Industry facility. As described above, the Agricultural Sensitivity for the site is considered negligible. The site is clearly not suitable for Agriculture and therefore an Agricultural Impact Assessment has no relevance to the application.

6.2 Archaeological and Cultural Heritage Impact Assessment & Paleontology Impact Assessment

The Archaeological and Cultural Heritage Sensitivity in terms of the Screening Tool is indicated as LOW. As indicated in *Section 5* above the site is already developed and the nature of the activity revolves around upgrades and additions to the existing facility. The site is located inside the Urban Edge and is earmarked and zoned for *Fishing Industry* purposes. The Vasco da Gama freshwater pit exist on site but it fenced and regarded as a no-go area. It forms part of the existing OEMP that was approved as part of the previous EA, whereby its regarded as a no development area and a no-go in terms of site operations.

No impacts would result from the proposed activity on any archaeological or cultural heritage resources and the National Heritage Resources Act will not be triggered. The Archaeological and Cultural Heritage Sensitivity in terms of the site is therefore considered negligible and no further studies in this regard are required.

6.3 Terrestrial Biodiversity, Plant &/or Animal Species Impact Assessment

According to the vegetation map the site historically consists of Saldanha Granite Strandveld which is an ENDANGERED vegetation type. However, the majority of the site is developed and the remaining 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 or animal species will therefore be disturbed within the building envelope proposed by the expansion activities because no natural area exist where the expansion is proposed.

Furthermore, 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 6 feet high 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 from the Main Road.

As mentioned above, Erf 1097 is located within the Urban Area of St Helena Bay and the site is zoned for Industrial use and has been in operation as a Fish Processing Plant since 1948. Environmental Authorisation (EA) for proposed upgrades, a Coastal Waters Discharged Permit (CWDP), and an Atmospheric Emissions License (AEL) has been granted to WPP. The site is located in the long existing 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 within the area.

The site is already developed, and the nature of the activity revolves around upgrades and additions to the existing facility on a disturbed factory site. The Terrestrial Biodiversity, Plant Species and Animal Species Sensitivity in terms of the site and the proposed activities is considered **negligible** and no further studies in this regard are therefore required.

6.4 Aquatic Biodiversity Impact Assessment

There are no freshwater resources on the site. The site is situated along the coast and therefore a Marine Impact Assessment will address the marine aquatic environment. The Aquatic Biodiversity Sensitivity in terms of the site is therefore considered negligible, and no studies are required in this regard.

6.5 Marine Impact Assessment

St Helena Bay is situated on the west coast of South Africa. The bay extends from Dwarskersbos in the north, past the Shelley Point Peninsula, to Cape St Martin in the west, and encompasses 18 smaller bays and the Berg River Estuary. The system is positioned in the southern section of the Benguela Current System, downstream of the Cape Columbine upwelling cell, and is characterised by the wind-driven upwelling of cold, nutrient rich water. St Helena Bay is a highly productive marine environment, and relatively sheltered from southerly and south westerly swells. Due to this enrichment and retention, St Helena Bay is a particularly productive system that supports a high biomass of marine biota and several important fisheries.

The highly productive, sheltered environment of the bay is also conducive to incidences of harmful algal blooms and regular episodes of oxygen depletion in the coastal waters, which have in the past led to major mortality events of organisms such as rock lobsters and fish. Low oxygen events that have led to stranding and mortality of marine biota have been documented at least once or twice per decade since the 1960s (these natural events were occasionally documented prior to this, but the published record is only considered consistent post 1960). While St Helena Bay is host to seasonal hypoxia events, and rare anoxia events, these are not persistent, and should not be considered the "norm" for the system, because St Helena Bay still supports abundant and diverse benthic and pelagic marine life.

Sediment in the bay is primarily composed of sand, a lesser fraction of mud and varying gravel content. Fine sediments tend to accumulate in the sheltered, retentive areas in the south of St Helena Bay which are characterised by low wave and current energy and longer residence times than areas in the more exposed northern part of the bay. As such, these areas tend to have higher levels of settlement and accumulation of particulate waste. It is notable that these sheltered bays are also where fish processing factories are located, and discharge effluent high in organics and particulate matter. This has important implications for benthic macrofauna, as fine sediments accumulate in the same areas as organic matter due to similar specific gravity, and this can result in anoxic conditions developing under high organic loading. Total Organic Carbon (TOC) and Total Organic Nitrogen (TON) are typically greater at sites sampled close to the fish factories compared to other areas in the bay, suggesting that these processing plants are important sources of organic enrichment in the bay. Indeed, processing of fish from the small pelagic fishery appears to not only influence organic content of sediment in the immediate vicinity of the fish factories during years of above average catches but also influences organic content of sediment in a greater area within the bay. The fish factory sites within the bay generally have the lowest C:N ratios due to impacts of nitrogen-rich wastewater discharged from vessels and processing plants.

While environmental monitoring undertaken by Lwandle in 2018 states that the "substantial periods of no discharge … should allow flushing and regeneration", this is not borne out by evidence of significant environmental degradation at some outfall sites over multiple years of monitoring. Sediment health has not improved over time, because there is a mismatch between the time required for regeneration, and the frequency of the impact. The impacts of the discharge when it does occur, even intermittently, is of a high intensity and due to the very sheltered nature of the small bays in the vicinity of the fish factories there is negligible "regeneration" during periods of no discharge.

Pollutant levels at the edge of the Recommended Mixing Zone (RMZ) are expected to comply with published Water Quality Guidelines (WQGs) which in turn are determined by the various beneficial uses of the receiving environment. Near field modelling was performed using the Cornell Mixing Zone expert system (CorMix) which was designed to predict the geometry and dilution characteristics within the RMZ

(100 m) for a range of discharge scenarios and to determine the minimum discharge depth required to achieve compliance with regional WQGs.

The West Point fish meal processing plant currently discharges effluent through two separate surf zone outfalls: Outfall A (32°46'34.94"S; 18° 3'1.72"E), which discharges cooling effluent; and Outfall B (32°46'30.64"S; 18° 2'58.85"E) which discharges fish processing effluent. The primary environmental concern around the effluent discharge from the West Point fish processing plant into St Helena Bay is the increased organic loading this effluent introduces to the water column and sediments. As such, the Outfall B pipe end constituents of concern are nutrients (including ammonianitrogen), indicators of nutrient pollution (such as biological oxygen demand), as well as total suspended solids (TSS) (derived from turbidity values). Temperature is the primary parameter of concern for the Outfall A discharge.

Anchor Environmental were appointed to undertake numerical dispersion modelling to assess the potential dilution and dispersion of the effluent from the expanded fish processing plant and to compile a marine specialist assessment of potential impacts on the marine environment. A Marine Impact Assessment has been undertaken by *Anchor Environmental* and the Impact Assessment will be included in the Part 2 Amendment Application Report.

6.6 Noise Impact Assessment

Considering the nature of the proposed Amendments, no additional noise impacts will be generated and therefore no Noise Impact Assessment will be undertaken. Noise impacts would be temporary in nature and as a result of the construction phase. These are addressed in the EMPr.

6.7 Traffic Impact Assessment

Considering the nature of the proposed Amendments, no additional traffic will be generated to the site and therefore no Traffic Impact Assessment will be undertaken.

6.8 Health Impact Assessment

Considering the nature of the proposed Amendments, no health impacts will be generated and therefore no Health Impact Assessment will be undertaken. Nuisance impacts would be temporary in nature and as a result of the construction phase. These are addressed in the EMPr.

6.9 Socio-Economic Impact Assessment

Plant efficiency is the primary goal of West Point Processors resulting in numerous upgrades required to the existing plant. The quicker the fish can be processed the fresher it is and the fresher the less impact it has in terms of odour and poor water quality. In addition, the quicker the fish can be processed, the better the control over the quality of the final product. Higher percentage of “super prime” meal can be

produced with a higher income to the factory. This will ensure sustainability of the current operation and its contribution to the local economy.

WPP has also been operating in the St Helena Bay community for more than a century with numerous social responsibility initiatives being undertaken. The most notable contribution is an on-site clinic with a registered nurse where free primary health care (including medication) is provided to all employees, their spouses and children. The financial contribution towards this initiative amounts to approximately R1,2million annually.

Socio-economic aspects will be addressed in Part 2 Amendment Report, however, a full socio-economic impact assessment is not required for the proposed amendments.

6.9 Air Quality Impact Assessment

The main aims of the Atmospheric Impact Assessment undertaken by *DDA Environmental Engineers* were to identify, assess and quantify the odour and air pollution impacts that are likely to occur in the surrounding areas of the plant due to its operations (as a result of the proposed upgrades proposed). Based on the dispersion modelling results, it was founded that the modelled ground-level concentrations of the various pollutants modelled were within their respective guidelines. Considering that 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 by the Specialists.

The proposed upgrades in terms of the Part 2 Amendment Application are minimal in nature and do not impact on any Air Quality aspects, no further studies will be undertaken in this regard.

7 CONCLUSION:

The only specialist study in accordance with the Screening Tool to be undertaken is the Marine Impact Assessment. Considering the 'developed' nature of the site, the Industrial zoning and nature of the site (and the surrounding area), the nature of the amendments proposed, no further specialist studies are proposed at this stage. For the reasons mentioned in *Section 5* above, all the Environmental Sensitivity Themes identified in the Screening Tool for the site are considered in this Site Sensitivity Verification Report as being **Low - negligible** for the proposed activities.

APPENDICES:

APPENDIX A: SCREENING TOOL REPORT

APPENDIX B: ZONING CERTIFICATE

APPENDIX C: ST HELENA BAY ZONING MAP