ANNEXURE 1: EAP CURRICULUM VITAE

CURRICULUM VITAE of PAUL HENDRIK SLABBERT

ENVIRONMENTAL & HERITAGE IMPACT PRACTITIONER

EAPASA Reg 2020 • Ref: 2019/1036

1. PERSONAL DETAILS

Born:	23 May 1973
Nationality:	South African
Drivers License:	Code EB
Languages:	Proficient in English and Afrikaans

2. KEY COMPETENCIES

I've completed my BACCALAUREUS ARTIUM ET SCIENTIAE Honors degree at the Potchefstroom University for CHO in 1995. The degree is primarily focused on qualifying Town and Regional Planners, but due to the SCIENTIAE (Science) component it equipped and stimulated my passion for environmental planning. Geography & Environmental studies, Sociology, Statistics and Mathematics in the first year and Geography & Environmental studies, Sociology in the second year formed the bases of my environmental education and interest. Economics up to 3rd year level and Statistics, Project Management and Planning Legislation at 4th year level provided me with an advance understanding of the development industry. The Town and Regional Planning curriculum from 1st to 4th year covered the entire spectrum of the built, people, heritage, natural and aesthetic environment in relation to the potential impacts on the socio, economic and bio-physical environment.

I started my Environmental Assessment Practitioner (EAP) career in 1998 as a professional practicing initially in the eco-tourism development industry. My passion for environmental, heritage & land-use planning with associated management strategies enable me to facilitate with all role players to find workable solutions in order to implement sustainable development in Greenfield areas. Due to the ECA (Act No. 73 of 1989) Section 21 Activities identified in 1997/8 the projects I was involved with required authorisation ito the ECA. As a result I started to practice as an EAP obtaining authorisations for triggered developments. I gained experience in rural and urban development with the emphasis on environmental impact assessments and management. This enabled me to have various publications in leading eco-tourism magazines. I've been witness to the evolution of the EIA industry from ECA to NEMA up to the current EIA Regulations. I've been operating as a Principal EAP and Environmental Practice owner for over 20 years.

During my career to date I have accumulated experience in the following key areas:

Impact Practitioner & Environmental Planner:

- Environmental Impact Assessments [legislative & process],
- Heritage & Visual Impact Assessments [legislative & process],
- Mining [legislative & process],

- Environmental Management [environmental control, management plans, Environmental & Social Management Systems],
- Conservation [management strategies, funding & alien vegetation],
- Power Generation [generation, distribution and powerline alignment]
- Land-Use [forward planning, feasibility study, business plan],
- Eco-tourism [trails, birding, recreation, construction, lodging],
- Community [facilitating, public participation, education],
- Water use authorisation [WULA's, GA's pollution prevention management plans and ELU's];
- Waste Management Licences [legislative & process];
- Air Emission Licences [legislative & process],
- Coastal Water Discharge Permits [legislative & process],
- Organizers [events, strategic, project management].

Business & Corporate Reasonability:

- Information on my Environmental Practice, PHS Consulting please view at www.phsconsulting.co.za
- For overview of my social and community engagement programme visit www.africanvisionfoundation.co.za

Advanced Legislative Knowledge:

Providing specialist services and managing and driving projects related to the following legislation:

- National Environmental Management Act (Act No. 107 of 1998) and 2017 Regulations;
- Environmental Conservation Act (Act No. 73 of 1989);
- National Heritage Resources Act (Act No. 25 of 1999);
- Land Use Planning Ordinance (Ordinance 15 of 1985);
- National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008);
- National Environmental Management: Waste Act (Act No. 59 of 2008);
- National Environmental Management: Air Quality Act (Act No. 39 of 2004);

- Mineral and Petroleum Resources Development Act (Act No. 28 of 2002);
- National Water Act (Act 36 of 1998);
- National Water Services Act (Act 108 of 1997).

3. TERTIARY EDUCATION

3.1 Honors Degree in B Art Et Scien (Planning)

Year/s of study:	1992 – 1995 (received 96/03/04)
Institution:	University of Potchefstroom (PU for CHO)
Course Modules:	Geography and Environmental Studies Industrial Sociology Town & Regional Planning Economics Mathematics Philosophy Sociology Statistics Planning Legislation
Honors Thesis:	Sustainable Development of Ikageng Township

4. REGISTRATIONS AND AFFILIATIONS

- Certified Member of the Interim Certification Board for Environmental Assessment Practitioners of South Africa – May 2009
- Professional Certified Member of AHAP now the Association of Professional Heritage Practitioners (APHP)
- Professional Member of the International Association for Impact Assessment (IAIA)

5. EMPLOYMENT RECORD

4.1 Current

Designation:	Self-Employed Principal Environmental Assessment Practitioner Heritage Assessment Practitioner Environmental Planner
Period:	1998 to current
Key responsibilities:	Environmental Practice (PHS Consulting) Owner that conduct, manage and review EIA's, Basic Assessments, Coastal Water Discharge Permit, Air Quality Licenses, Waste Management Licenses, Setback Line applications, Water Use Authorizations, General Authorizations, NEMA S24G Applications, Mining Permit and License applications. Authorisation and License compliance audits, EMP's, ECO

work, Social and Labour plan compilations, Alien Eradication Management Plans, Fire Management Plans, Maintenance Management Plans, Wild Life Management Plans. Environmental feasibility planning, event organizing and Corporate Social Investment programmes.

PHS Consulting: As sole Member of the Close Corporation I currently employ two fulltime EAP's namely Amanda Fritz-Whyte and Nadine Duncan. We make use of various freelance EAP's and specialist consultants depending on the project type.

4.2 Pre PHS Consulting

Designation: Employed by OmniPlan
Period: 1997 to 1998
Key responsibilities: Planning Administration, Town Planning Applications, Constraint Analysis, Layout and Design, Community Presentations.

6. COURSE / CONFERENCE PARTICIPATION

5.1 Short courses completed

I attended various DEA&DP, APHP, IAIA, Fynbos & SANBI forum workshops, training programmes and conferences since 1999 to date.

7. LIST OF EIA PROJECTS TO DATE

Please note over the years in practice I conducted many projects and it's impossible to list them all. He is a summary of the most relevant EAP projects that illustrate my competence, knowledge and experience.

Major project	Tasks	Employer/client	Responsibility
Namaqualand Casino Development **1998**	Evaluate and assess various site alternatives for the development of a casino in Namaqualand. Assess bio-physical & socio-economic environments from Garies to Vioolsdrif to Pella inland environments. Assessment of the entire coastal environment from Groenrivier mouth to Alexander bay. Presented preferred site alternative to be included in national bid for license allocations	Namaqualand District Council	Act as researcher, public participation liaison and site assessment consultant
Barolong Archaeological Eco-tourism Assessment **1999 - 2000**	Investigate the feasibility to develop eco-tourism activities amongst the Barolong Tribe kraal systems on the highlands of the North West Province. After survey and mapping, proposed a feasible site close to Hartebeesfontein (NW). Planned hiking and mountain bike trails system in terms of bio-physical and heritage constraints. Drafted a management plan for trail system and developed the trail system and product. Launched and operated initial phase until handover to landowners.	Hartebeesfontein Farmers Association	Site Analysis, layout development, Heritage Practitioner (HP) and environmental management and ECO work

EIA's on 4x4 trails and overnight huts, **2000 - 2001**	Completed 3 x EIA's on 4x4 trails in the Du Toit Kloof and Hexriver mountains. Worked according to DECAS guidelines and ECA process at the time.	Private Landowners and conservancies	EAP
Anglo Gold Game Reserves – North West, Gauteng, Free State Provinces **2001**	Contracted as Environmental Management Officer for Anglo Gold mining group in Vaal Reefs. I drafted EMP's for all three of the Nature Reserves and Interpretation Centres. This was followed by ecotourism master plans to focus on sustainable use of the Reserves. I acted as ECO, for the building projects (Lodges) in the reserves and on most of the adjacent mining areas. Water Management and monitoring of water samples were part of the duties	Anglo Gold Ashanti	ECO, HP and IEM officer
Contracted by Uluntu Environments for trail planning and assessments **2002**	Status quo assessments on all trails and tracks conditions in the Rhodes Memorial, Devils Peak, Sandy Bay , Buffels Bay, Table Mountain and Cape Point areas of the Cape Peninsula National Park. Proposed rehabilitation plans, construction plans and new routes. Assess potential impact on new and disturbed areas. Construction implementation and ECO.	City of Cape Town, Cape Nature	Planning, Environmental Assessment & ECO
Kronendal Estate Residential Development – Houtbay, **2003**	Environmental Impact Assessment and EMP's	Dormacorp Pty Ltd & First Plan town and regional Planners	EAP
Community Centre site selection – Pringle Bay **2003**	Site Analyses in coastal zone, with comprehensive public participation. This was to determine a feasible site form both an environmental and community perspective	Hangklip Kleinmond Municipality	Site Assessor and Public participation Liaison
Mosaic Farm, Walkerbay Fynbos Conservancy, Stanford, Western Cape **2003 – 2005**	Project and Conservation Management contract, responsible for drafting and implementing a major, building restoration and alien clearance program. Planning and implementing the Walkerbay Fynbos Conservancy Hiking trail alignments and management plans. Responsible for assessing development footprints for overnight camps. Implementation of a fire management plan and action plan.	Hermanus Riviera Estates	Environmental Planner, HP, Implementing Agent and Assessor
Chairman Birdlife Walke Bay **2003 - 2005**	Established bird club and birding project in the Overberg and the Stanford Bird fair	Birdlife South Africa	Chairman (WB), Event Organiser and Community Liaison
Hoopjiesrivier, Free Range Chicken Farm (Farm 541 Caledon)– Karwyderskraal, **2006**	Basic Assessment and EMP's	ITAKANE	EAP
Heritage Heights (Portion 81 of the Farm 229) residential	Visual Impact Assessment (VIA) and Heritage Impact Assessment (HIA)	Andre Snyman	VIA and HP

development – VanWyksdorp, **2006**			
Kleinberg residential and retirement village development (erf 459) – Riviersonderend **2007**	Basic Assessment, EMP's and Landscape Planning	Jacob du Toit	EAP
Gansbaai Industrial extension (erf 210) – Gansbaai **2007**	Basic Assessment, EMP's	Overstrand Municipality	EAP
Kleinbaai harbour dredging – Gansbaai **2007**	Basic Assessment, EMP's	Overstrand Municipality	EAP & ECO
Langeberg Cheese factory (Portion 69 of Farm no.159) – Buffelsjag **2008**	Basic Assessment, EMP's	Langeberg Kaas Pty Ltd	EAP
Industrial development (erf 931)- Struisbaai **2008**	Basic Assessment, EMP's, Landscape Planning	Louis Greeff	EAP
Shopping Centre Development – Livingstone Zambia **2008**	EIA and EMP's	Shoprite Checkers	EAP
Billboard development (erf 35270) – Milnerton **2008**	Basic Assessment, EMP's	CK Outdoor Advertising Pty Ltd	EAP
Fick's Pool Restuarant – Hermanus **2008**	Basic Assessment, VIA and HIA	Overstrand Municipality	EAP. VIA & HP Practitioner
Residential Development (erf 1497) – Vermont **2009**	Basic Assessment, EMP's, Landscape Planning	CRISTATUS INV 85 CC	EAP
Single Dwelling Development (erf 278) – Malgas **2009**	Basic Assessment, EMP's	PJW Terblanche	EAP & ECO
Petrol Filling Station (erf 1) – Swellendam **2009**	Scoping, EIA and EMP's	Swellendam Municipality	EAP

Fish Processing Plant – St Helena Bay **2009**	Basic Assessment, EMP's	West Point Processing Pty Ltd	EAP & ECO
Bloemendal Wine Estate – Durbanville **2009**	VIA and HIA	Spirito Trade 82 Pty Ltd	VIA & HP Practitioner
Maandagskop and Airport Quarries – Mosselbay and George **2009**	Environmental Management Programme Reports and Audits	Terblanche Transport	Environmental Auditor
Matroosberg Reserve (Farm 424) Ceres **2010**	Basic Assessment & EMP's	Erfdeel Boerdery	EAP & ECO
Kleinbaai Harbour Expansion (Erf 423) - Gansbaai **2010**	Basic Assessment & EMP's	Overstrand Municipality	EAP
Retirement Village Development (Erf 5379 & 5300) – Onrusrivier **2010**	Basic Assessment, EMP's & ECO	Tweefonteine Ontwikkelings Trust	EAP & ECO
Industrial Development (Erf 2015) – Riversdale **2010**	Basic Assessment, EMP's & ECO	Hessequa Municipality	EAP & ECO
Residential Development (Erf 987) – De Kelders **2011**	Basic Assessment & EMP's	Hopefull Trust	EAP
Unlawful Vegetation Removal (Farm 237) - Elim **2011**	S 24 G & EMP	Moravian Church of Elim	EAP
Graveyard Development – Springbok, Okiep, Bergsig, Matjieskloof, Kommagas, Nababeep – Northern Cape **2011**	Basic Assessments & EMP's	Nama Khoi Local Municipality	EAP
Residential Development (Erf 8704) – Paarl **2011**	Basic Assessment & EMP's	Nevensaan Ontwikkelings	EAP
Wetland Rehabilitation – Tesselaarsdal **2011**	Basic Assessment & EMP's	Department of Agriculture and Tesselaarsdal Action Group	EAP

Mushroom Farm Development (Farm 436/27) – Botrivier **2011**	Basic Assessment & EMP's Waste Licence	Ocean Mushrooms	EAP & ECO
Blouberg Mine Development (Farm 88 & 91) – Melkbosstrand **2012**	Visual Impact Assessment	Tip Trans	Visual Assessor
Urban Expansion Residential Estate (Farm 436/5) – Botrivier **2012**	Scoping, EIA & EMP's	Crimson Properties	EAP
Cemetery Development (Erf 513 – Napier **2012**	Basic Assessment & EMP's	Cape Agulhas Municipality	EAP
Coastal Sidewalks Development (Erf 462) - Franskraal **2012**	Basic Assessment & EMP's	Overstrand Municipality	EAP
Riverside Residence Development (Farm 321) – Stanford **2012**	Basic Assessment & EMP's	Astrodome Investments	EAP
Eco- Village Development (Farm 483/2) - Caledon **2012**	Basic Assessment & EMP's	Theewaterskloof Municipality	EAP
Botrivier Windfarms – Botrivier **2013**	Appointed to oppose the development of windfarms outside regional allocated areas as part of the "Wind Rush" period. Scrutinise and evaluate Scoping & EIA Documents on behalf of opposition. Handling of Appeal.	Wildekrans Wine Estate and Botriver Community	Opposing EAP
Resort Development (Farm 213) – Bonnievale **2013**	S24 G & EMP's	De Hoek Trust	EAP
Commercial Development – Chililabombwe Zambia **2013**	EIA	Shoprite Checkers	EAP
Birding Route Development – South Africa **2013 to 2016**	Environmental Planning to establish and support birding development in all the South African Provinces	E Snell & Co Funder and BirdLife SA and SANPARKs Honorary Rangers	Environmental Planner
Intensive Feed Farm Development (Farm 728/2) – Grabouw **2013**	Basic Assessment & EMP's	Babel Trading	EAP & ECO

Uilenvlei Private Nature Reserve, resort development – Uilkraalmond **2013**	Basic Assessment & EMP's	Southern Spirit Properties	Compile & Review EAP
Development of five Cemeteries - Upington **2014**	Basic Assessment & EMP's	Khara Hais Local Municipality	EAP & HP
Commercial Development – Mongu Zambia **2014**	EIA	Shoprite Checkers	EAP
Establish Hartenbos River Water Users Association – Hartenbos **2014**	Draft Constitution, verify ELU's conduct Public Consultation	Hartenbos River Water Users Association	Water Resource Consulting
Commercial Development Cabinda – Angola **2014**	EIA	Shoprite Checkers	EAP
Resort Development (Farm 633 & 273) – Swellendam **2014**	Basic Assessment & EMP's	Bakkelys Drift Properties	EAP
Natures Path Lifestyle Village - Keurboomstrand **2015**	Heritage Impact Assessment guiding the EIA process towards a more aesthetic SDP	Sharples Environmental	Heritage Impact Assessor (HP)
Hazardous Waste Assessment – Castle Mews Woodstock **– 2015**	Assess hazardous waste contamination in basement of old buildings, establishing the source and report finding the competent authorities. Assist with drafting management actions to clean-up and resolve.	Castle Mews	Waste Assessor
Commercial Development Kuito – Angola **2015**	EIA	Shoprite Checkers	EAP
Residential Development (Farm 142/14) – Rheebok **2015**	Basic Assessment & EMP's	Mercedes Trust	EAP & ECO
Water Act and Use Interpretations for Commercial off grid Systems – Western Cape **2015**	Site Assessments, Technology Assessment, Legislation Applicability, Interpretation of the Water Act.	Shoprite Checkers	Water Assessor

Coastal Sidewalk and Trail Development – Kleinmond **2015**	Basic Assessment & EMP's	Overstrand Municipality	Review EAP
Wetland Rehabilitation Plan; Operational Environmental Management Plan and Environmental Liaison Committee – Sun Valley Mall Noordhoek **– 2015**	Rehabilitation Plan, OEMP & ELC	Shoprite Checkers and City of Cape Town	EAP & ECO
Air Emissions Licence (2 Neil Hare Rd) - Atlantis **2016**	Air Emissions Assessment	Malmesbury Sterilisasie Aanleg	EAP
Kenhardt Solar Power Farms and Power Lines – Northern Cape **2016-2018**	Appointed to investiage the development of solar farms an powerline distribution lines outside regional allocated areas as part of the "Solar Rush" period. Scrutinise and evaluate Scoping & EIA Documents on behalf of opposition. Handling of Appeal.	Dagab & Rooidam Farms	Analysing EAP
Jetty Development in Protected Area (Farm 480/136) – Stillbaai **2016**	Basic Assessment & EMP's	Koringfontein Farm	Review EAP
Intensive feed Farm (Farm 226) – Hermanus **2016**	Basic Assessment & EMP's	Bapchix	Review EAP & ECO
Industrial Development (Erf 1) - Caledon **2016**	Basic Assessment & EMP's	Theewaterskloof Municipality	EAP
Abalone Farm Development (Farm 421/1) – Doringbaai **2016**	Basic Assessment & EMP's	Doring Bay Abalone	Review EAP
Stander Mine (Farm 189/83) – Wilderness **2016**	Basic Assessment & EMP's	Viadro 127	EAP & ECO
ECO Lifestyle Estate & Nature Reserve, Hoek vd Berg (Farm 572) – Hermanus **2017**	Scoping EIA & EMP's, HIA	Saddle Path Properties	Review EAP, Heritage Assessor and Water Assessor
Abalone Farm Development (Farm	Basic Assessment & EMP's	Jacobsbaai Sea Products	Compile & Review EAP & ECO

108) - Jacobsbaai **2017**			
Demolition Waste Management – Cape Peninsula **2017 ongoing**	Waste Management Plans for demolition and redevelopments	Shoprite Checkers	Waste Assessor
Resort Development (406/58) – Slanghoek **2017**	Basic Assessment & EMP's	Slanghoek Resort	Review EAP & Visual Assessor
Resort Development (Farm 627/1) - Stanford **2017**	Basic Assessment & EMP's	Philipskop	Review EAP
Intensive Feed Farm (Farm 541/6) – Karwyderskraal **2017**	Basic Assessment & EMP's	Itakane Trading	Review EAP & ECO
Henkershoek Mine (Farm 628) – Albertinia **2017**	Basic Assessment & EMP's	Viadro 127	Compile & Review EAP
Heavy Minerals Prospecting (Alexcor Mining Right Area) – Alexanderbaai **2018**	Basic Assessment & EMP's	Vast Mineral Sands	EAP
Commercial Development Namibe – Angola **2018**	EIA	Shoprite Checkers	EAP
Resort Development (Farm 465) – Elgin **2018**	Basic Assessment & EMP's	On The Earth	Review EAP
Residential Development (Erf 1019) - Wilderness **2018**	Basic Assessment & EMP's	Costa	Compile & Review EAP
Residential Development (Erf 1156) – Witsand **2018**	Basic Assessment & EMP's	Westfield Trust	EAP & ECO
Van Der Stell Liquor Store – Stellenbosch **2019**	Heritage Impact Assessment	Shoprite Checkers	HP
Weir and Pipeline Development (Huiskloof River) – Botrivier **2019**	S24G & EMP's	Erin de Vigne	EAP

Crocodile Diving Facility (Erf 48) – Birkenhead **2019**	Cape Nature Permitting & EMP	Afrikanos	EAP
Abalone Farm Development (Farm 6/453) – Gouritsrivier **2019**	Basic Assessment & EMP's	Aqunion	Compile & Review EAP
Heavy Minerals Prospecting (Trans Hex Mining Right Area) – Hondelipbaai **2019**	Basic Assessment & EMP's	Saxon	EAP
Intensive Chicken Farm (Farm 487) – Caledon **2019**	Basic Assessment & EMP's	Elgin Free Range Chickens	Review EAP
Agricultural Cultivation (Farm 3/497) – Malgas **2019**	Scoping, EIA & EMP's	Eksteen Familie Trust	Review EAP
Airport Quarry (Farm 129/208) – George **2019**	Scoping, EIA & EMP's	Mercedes Trust	Compile & Review EAP
Constantia Emporium Retail Centre - **2020**	Heritage Interpretation Story & Signage	Shoprite Checkers	HP
Commercial Retail Development – City of Cape Town **2017 – 2020**	Environmental Management Plans & Environmental Control Officers various projects, Delft, Sun Valley, Constantia, Sitari, Brackenfell, Paarl, Table View and Gordons Bay.	Shoprite Checkers	EMP & ECO
Heavy Mineral Mines – Alexcor Northern Cape **2020 – 2021**	Environmental Impact Study	Deep Blue Minerals	EAP
Free Range Chicken Farms – **2020 – 2021**	Environmental Impact Assessment	Elgin Free Range Chickens	EAP
Sitari Retail Centre - **2021**	Heritage Interpretation Story & Signage	Shoprite Checkers	HP
Cape Winelands Airport – City of Cape Town **2021 – 2022**	Environmental Impact Study	Cape Winelands Airport	EAP
Hoop Urban Expansion – Overberg **2022**	Environmental Impact Study Heritage and Visual Impact Study	Hoop Trust	EAP & HIA
Mill Steam – Stellenbosch **2022**	Heritage Impact Assessment	Shoprite Checkers	HP

Commercial Heritage Development – Paardevlei **2022**	Heritage Impact Assessment	Shoprite Checkers	HP

CURRICULUM VITAE

JENNA MAREE THERON

ENVIRONMENTAL ASSESSMENT PRACTITIONER

EAPASA Reg no: 2022/5926

PERSONAL PROFILE

Gender: Female	Date of Birth: 4 October 1984
Nationality: South African	Languages: Proficient in English and Afrikaans

KEY COMPETANCIES

I completed my Bachelor's degree (International Studies) focusing on Political Science, History and Sociology in 2005 and my Master's degree (Cultural Tourism and Heritage Studies) at the University of Stellenbosch in 2007. My Master's degree was undertaken predominately through the Department of History and the Department of Geography & Environmental Studies. In 2008 I was accepted into the City of Cape Town's Environmental Resource Management Departments Internship Program for a 12-month period. My internship was invaluable to my career as it equipped me with the practical skills and knowledge behind environmental planning. I received a certificate of commendation for 'Outstanding contribution to the Environmental Internship Programme 2008'. I officially started my EAP career in 2009 as a professional Environmental Consultant within the Private Sector and resign from Doug Jeffery Environmental Consultants as a Senior Environmental Consultant in 2016 to pursue a freelance career as an Environmental Consultant. I have gained experience in rural and urban development with the emphasis on environmental impact assessment and management within South Africa, operating as an EAP for over 15 years.

During my career to date, I have accumulated experience in the following key areas:

- Environmental Impact Assessments [legislative & process],
- Environmental Management [environmental control, management plans, Environmental Management Systems],
- Community [facilitating, public participation];
- Waste Management Licenses [legislative & process];
- Air Emission Licenses [legislative & process],
- Coastal Water Discharge Permits [legislative & process],
- Section 34 Heritage Permits,
- Organizers [project management].

Advanced Legislative Knowledge in:

- National Environmental Management Act (Act No. 107 of 1998) and 2017 EIA Regulations;
- National Heritage Resources Act (Act No. 25 of 1999);
- Land Use Planning Ordinance (Ordinance 15 of 1985);
- National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008);
- National Environmental Management: Waste Act (Act No. 59 of 2008);
- National Environmental Management: Air Quality Act (Act No. 39 of 2004); and
- National Water Act (Act 36 of 1998).

EDUCATION

2006-2007 Tertiary education (Cum Laude)

Stellenbosch University

Masters in Philosophy (MPhil), Cultural Tourism and Heritage Studies (2 Years)

2003-2005 Tertiary education

Stellenbosch University
Bachelor of Arts (BA), International Studies (3 Years)

EMPLOYMENT RECORD

OVER 17 YEARS EXPERIENCE IN EIA'S

Freelance Environmental Consultant (2017 - present)

Senior Environmental Assessment Practitioner

- Training and experience in applying the principles of Integrated Environmental Management (IEM), and in applying the Environmental Impact Assessment (EIA) Regulations to a number of development projects and initiatives in South Africa that trigger the National Environmental Management Act.
- Facilitation, co-ordination, management and monitoring of all aspects of the EIA process.
- Liaising with specialists and all members of the project team to ensure a full understanding of the scope of work required throughout the process;
- The compilation of reports: Applicability Applications, Constraints Analysis, Basic Assessment Reports, Scoping and Environmental Impact Assessment Reports, Damage Assessment Reports (24G Applications), Rehabilitation Plans, Audit Reports and Environmental Management Programmes;
- Liaising with interested and affected parties and facilitating the public participation process required in terms of the EIA Regulations; and
- The compilation of Section 34 Heritage Applications including the liaising with the public and heritage authorities.

Doug Jeffery Environmental Consultants (2009 - 2016)

Senior Environmental Assessment Practitioner

- Training and experience in applying the principles of Integrated Environmental Management (IEM), and in applying the Environmental Impact Assessment (EIA) Regulations to a number of development projects and initiatives in South Africa that trigger the National Environmental Management, the National Environmental Management: Waste Act etc..
- Facilitation, co-ordination, management and monitoring of all aspects of the EIA process.
- Liaising with specialists and all members of the project team to ensure a full understanding of the scope of work required throughout the process;
- The compilation of reports: Constraints Analysis, Basic Assessment Reports, Scoping and Environmental Impact Assessment Reports, and Damage Assessment Reports (24G Applications) etc.;
- Liaising with interested and affected parties and facilitating the public participation process required in terms of the EIA Regulations.

City of Cape Town: Environmental & Heritage Resource Management

Internship (2008)

- Read, assess and comment on EIA, EMP, OEMP, CEMP, and Basic Assessments as per NEMA.
- Read, assess and comment on land-use planning applications, mining applications and heritage applications.
- Process signage applications.
- Assess and prepare approvals for landscaping plans.
- Compliance monitoring.
- Undertake site visits and write reports.
- Attend meetings and take minutes.
- Liaise with ECO's.
- Filling and administrative tasks.
- Assist members of the public with general environmental, heritage and signage queries.

PROFESSIONAL AFFILIATION:

Member of IAIA (International Association for Impact Assessment)
Member of Association of Professional Heritage Practitioners – Western Cape (APHP)
Professional Member of EAPASA - EAPASA Reg no: 2022/5926

COURSE CONFERENCE PARTICIPATION:

I attended various DEA&DP & IAIA forum workshops, training programmes and conferences since 2008 to date.

PROJECT RECORD TO DATE:

COMPLETION DATE	PROJECT DESCRIPTION	TYPE	APPLICANT:	ROLE:
1 NOVEMBER 2023	THE "CARPENTERS WORKSHOP" ON ERF 18792, SOMERSET WEST	Section 34, NHRA	SHOPRITE CHECKERS (PTY) LTD	Main Author & Researcher of Heritage Statement. Assisted & reviewed by Paul Slabbert Liaised with Authorities & IA&Ps and conducted PPP
29 AUGUST 2023	THE "LOCOMOTIVE SHED" ON ERF 18792, SOMERSET WEST	Section 34, NHRA	SHOPRITE CHECKERS (PTY) LTD	
3 APRIL 2023	ERF 12257, HERMANUS (4 SEA ROAD, "THE KEEP")	Section 34, NHRA & NEMA Applicability Checklist	SERAF DEVELOPMENT 1 (PTY) LTD.	
1 AUGUST 2023	EXPANSION OF THE EXISTING SHOPRITE CHECKERS DISTRIBUTION CENTRE SITUATED ON ERF 8741 WELLS ESTATE, EASTERN CAPE PROVINCE.	AMMENDED EA	EQUITIES PROPERTY FUND LIMITED	<u>Principle EAP:</u> Main Author of all reports (reviewed by Paul Slabbert) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
End 2022	THE WEST POINT PROCESSORS FISH PROCESSING PLANT ERF 1097/3, ST HELENA BAY.	ANNUAL AUDIT REPORT	WEST POINT PROCESSORS	
AUGUST 2022	THE MATROOSBERG 4x4 TRAIL ON THE REMAINDER OF FARM 424 (CERES), PORTION 3 OF FARM 356 (CERES), FARM 355 (CERES), FARM 40 (WOCESTER) & THE REMAINDER OF FARM 57 (WOCESTER), WESTERN CAPE	EMP (OPERATIONAL PHASE)	MATROOSBERG RESERVAAT CC	
OCTOBER 2022	THE PROPOSED EXPANSION/ UPGRADING OF THREE DAMS AND ASSOCIATED INFRASTRUCTURE FOR THE PURPOSES OF ESTABLISHING ORCHARDS AS WELL AS THE CONSTRUCTION OF AN AIRSTRIP, HANGAR AND JETTY ON PORTION 4 OF FARM	BAR/EMP	FULELA TRADE AND INVEST 68 CC.	

	NO. 493 (INHOEK FARM), SWELLENDAM			
NOVEMBER 2022	THE PROPOSED REVERSE OSMOSIS (RO) PLANT AT THE WEST POINT FISH MEAL PROCESSING PLANT, ON ERF 1097, ST HELENA BAY, WESTERN CAPE	BAR/ EMP/ CWDP	WEST POINT PROCESSORS	
MAY 2022, amended AUG 23	REMOVAL OF VEGETATION ON PORTION 3 OF FARM JONKERSRUST, NO. 548, SWELLENDAM	REHAB PLAN	BLOMDAL PLASE PTY LTD	<u>Principle EAP:</u> Main Author of all reports (reviewed by Paul Slabbert) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
APRIL 2022	CAMP SITE ON PORTION 3 OF FARM MICHELS KRAAL NO. 457, SWELLENDAM	REHAB PLAN	KOESANIE TRUST	
27/07/2022	THE PROPOSED EXPANSION OF WEST POINT PROCESSORS, ON ERF 1097, ST HELENA BAY, WESTERN CAPE.	BAR/ EMP/ AEL/ CWDP	WEST POINT PROCESSORS	
End 2021	THE WEST POINT PROCESSORS FISH PROCESSING PLANT ERF 1097/3, ST HELENA BAY.	ANNUAL AUDIT REPORT	WEST POINT PROCESSORS	
NOVEMBER 2020	REMAINDER OF FARM (HOEK VAN DE BERG) NO. 572, HERMANUS: LANDING STRIP REHABILITATION PLAN	AUDIT REPORT	UVA PROPERTIES (PTY) LTD	
AUGUST 2020	THE WEST POINT PROCESSORS FISH PROCESSING PLANT ERF 1097/3, ST HELENA BAY.	CONTINGENCY PLAN	WEST POINT PROCESSORS	
End 2020	THE WEST POINT PROCESSORS FISH PROCESSING PLANT ERF 1097/3, ST HELENA BAY.	ANNUAL AUDIT REPORT	WEST POINT PROCESSORS	
25/11/2019	THE WEST POINT PROCESSORS FISH PROCESSING PLANT ERF 1097/3, ST HELENA BAY.	EXTERNAL AUDIT REPORT	WEST POINT PROCESSORS	<u>Principle EAP:</u> Independent Auditor
22/11/2019	THE PROPOSED CULTIVATION OF LAND ON PORTION 3 OF FARM MELK HOUTE BOSCH NO. 497, SWELLENDAM, WESTERN CAPE	EIA/EMP	JOHANNES EKSTEEN FAMILIETRUST	<u>Principle EAP:</u> Main Author of all reports

14/11/2019	THE UNLAWFUL CONSTRUCTION OF A PIPELINE AND A WEIR IN THE HUISKLOOF RIVER (BOTRIVIER)	24G/EMP	ERIN DE VIGNE (PTY) LTD.	(reviewed by Paul Slabbert) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
16/01/2017	THE CONSTRUCTION OF A COMMERCIAL SHOPPING CENTRE ON PORTION 6 OF FARM BARDALE NO.451 AND PORTION 6 OF FARM AMSTERDAM NO 949, BLUE DOWNS	AMENDMENT	SHOPRITE CHECKERS PROPERTIES (PTY) LTD.	
22/11/2016	THE PROPOSED CONSTRUCTION OF A JETTY, ON PORTION 136 OF FARM 480, MELKHOUTFONTEIN (RIVERSDAL).	BAR/ EMP	FARM KONINGSFONTEIN (PTY) LTD.	
22/08/2016	THE PROPOSED DEVELOPMENT OF AN ADDITIONAL RESERVOIR ON A PORTION OF PORTION 1 OF FARM NO. 888 (LA PARRISSA), PAARL (15/44)	BAR	DRAKENSTEIN MUNICIPALITY	<u>Principle EAP:</u> Main Author of all reports (reviewed by Paul Slabbert) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
20/07/2015	THE PROPOSED CONSTRUCTION OF A RESIDENTIAL DEVELOPMENT ON PORTIONS 9 AND 17 OF THE FARM NO. 681, FIRGROVE	BAR	JANIGENIX (PTY) LTD	
30/04/2015	THE PROPOSED DEMOLISHMENT OF THE EXISTING DWELLING AND THE CONSTRUCTION OF A NEW DWELLING ON ERF 46, CASTLE ROCK (14/39)	SBL	MR ROY JAMES GILES	
06/06/2016	THE PROPOSED RESIDENTIAL ESTATE ON PORTIONS 3, 9 & 14 OF FARM NO. 654, CROYDON, STELLENBOSCH	BAR	JV WILNET (PTY) LTD	
08/09/2014	THE PROPOSED FLAT SIGNAGE TO BE ERECTED ON THE FAÇADE OF BUILDINGS AND AN ENTRANCE WALL LOCATED ON PORTION 477 OF FARM NO 728 JOOSTENBERG VLAKTE 14/35	SIGNAGE APP	LOUGOT PROPERTY INVESTMENTS (PTY) LTD.	<u>Principle EAP</u> compilation & submission of application.

22/03/2016	THE UNLAWFUL CONSTRUCTION OF FACILITIES FOR THE CONCENTRATION OF ANIMALS FOR THE PURPOSE OF COMMERCIAL PRODUCTION (FEEDLOTS) ON PORTION 3 & 8 OF FARM 128 (OSDAM FARM), PIKETBERG 14/27	24G	OSDAM BOERDERY (PTY) LTD.	<u>Principle EAP:</u> Main Author of all reports (reviewed by Doug Jeffery) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
01/12/2015	THE PROPOSED RESIDENTIAL FARMING VILLAGE ON A PORTION OF FARM 1793, SIMONDIUM, PAARL (14/42)	BAR	NIEUWE SION (PTY) LTD.	
30/10/2014	THE UNLAWFUL DECOMMISSIONING OF A SERVICE STATION ON ERF 37366, OMURAMBA DRIVE, MONTAGUE GARDENS.	24G	VAIDRO 184 CC C/O JAN DE MUNCK INC.	
28/01/2015	THE PROPOSED UPGRADE OF MAIN ROAD 281 (DRAAIBERG), VILLIERSDORP (14/14).	BAR	PROVINCIAL GOVERNMENT WESTERN CAPE: DEPARTMENT OF TRANSPORT AND PUBLIC WORKS	
10/11/2015	THE PROPOSED INSTALLATION OF A PEDESTRIAN FOOTBRIDGE AND ASSOCIATED INFRASTRUCTURE OVER THE VYGEKRAAL RIVER ON ERF 32604 LOCATED BETWEEN KEWTOWN AND BRIDGETOWN	BAR	CITY OF CAPE TOWN TRANSPORT PLANNING DEPARTMENT	
11/08/15	THE UNLAWFUL EXPANSION OF TOURIST FACILITIES AND THE CONSTRUCTION OF INFRASTRUCTURE ON PORTION 26 OF FARM NO. 1041, FRANSCHHOEK 14/01.	24G	LA MOTTE WINE ESTATE (PTY) LTD.	
29/04/2014	THE PROPOSED FORMALISATION OF THE STORMWATER DRAINAGE LINE AT KM 1.6 OFF THE KLAASVOOGDS WES ROAD (DR 01368), ROBERTSON 13/35.	BAR	CAPE WINELANDS DISTRICT MUNICIPALITY	
24/01/2014	THE PROPOSED ADDITIONS TO THE EXISTING DWELLING, ERF	SBL	MR. GEORGE P	<u>Principle EAP:</u>

	5599, BETTY'S BAY		DALL	Main Author of all reports (reviewed by Doug Jeffery) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
07/01/2014	THE PROPOSED ALTERATIONS AND ADDITIONS TO THE EXISTING BUNGALOW ON ERF 490, THE RIDGE, CLIFTON.	SBL	MR.& MS. C. WIESE	
10/12/2014	THE PROPOSED CONSTRUCTION OF A WASTE RECYCLING FACILITY ON PORTION 660 OF FARM NO. 454, WIMBLEDON ESTATE, BLACKHEATH.	BAR	RE-ETHICAL ENVIRONMENTAL RE-ENGINEERING (KZN) (PTY) LTD.	
04/03/2014	THE PROPOSED DEMOLITION OF AN EXISTING DWELLING AND CONSTRUCTION OF A SINGLE RESIDENTIAL DWELLING AND ASSOCIATED INFRASTRUCTURE ON ERF 45, BANTRY BAY.	SBL	MR.S. B. UPPINK	
30/03/2016	THE PROPOSED DEVELOPMENT OF AN ADDITIONAL DWELLING ON PORTION 99 OF FARM 559 SKILPADVLEI, PRINGLE BAY 13/02	BAR	SKILPADVLEI FARM (PTY) LTD.	
14/11/2014	UNLAWFUL CONSTRUCTION OF A TRACK FOR THE TESTING AND RECREATIONAL USE OF MOTOR POWERED VEHICLES ON THE REMAINDER OF FARM 1610, FRANSCHHOEK (13/23)	24G	L'ORMARINS (PTY) LTD.	
19/03/2015	THE UNLAWFUL CONSTRUCTION OF A SLAGMENT PLANT AND A CEMENT BLENDING PLANT ON PORTION 656, 664 AND 665 OF FARM WIMBLEDON NO. 454, BLACKHEATH	24G	MR WILLIE SCHEEPERS	
10/10/2014	THE PROPOSED ESTABLISHMENT OF THE SITARI LIFESTYLE ESTATE ON ERF 1840, CROYDON IN THE HELDERBERG.	EIA/ AMENDMENT	SITARI COUNTRY ESTATE (PTY) LTD	
10/06/2014	THE UNLAWFUL COMMENCEMENT OF A LISTED ACTIVITY: THE INFILLING OF A WETLAND ON PORTION 10 OF FARM 654, CROYDON, STELLENBOSCH	24G	JV WILNET (PTY) LTD	<u>Principle EAP:</u> Main Author of all reports (reviewed by Doug Jeffery) Liaised with
28/11/2014	THE UNLAWFUL COMMENCEMENT Of A LISTED ACTIVITY: DISPOSAL Of WASTE TO LAND ON PORTION 14 OF FARM 654, CROYDON, STELLENBOSCH	24G	JV WILNET (PTY) LTD	

11/11/2014	THE PROPOSED DEMOLITION OF THE EXISTING RESIDENTIAL DWELLING AND ASSOCIATED INFRASTRUCTURE AND THE CONSTRUCTION OF A NEW RESIDENTIAL DWELLING AND ASSOCIATED INFRASTRUCTURE ON ERF 2595, GLEN BEACH, CAMPS BAY.	SBL	MR N. M. PHILLIPS	Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
03/06/2013	THE ESTABLISHMENT OF THE HERITAGE PARK RETIREMENT VILLAGE ON A PORTION OF THE FARM ONVERWACHT NO. 811 AND A PORTION OF THE FARM DIE BOS NO. 810, SOMERSET WEST (AN 231 /25/4 FARM 810 AND 811, SOMERSET WEST)	AMENDMENT	MR. S. H. EHLERS	
22/10/2012	THE PROPOSED FLAT 'LETTER' SIGN TO BE ERECTED ON THE FAÇADE OF A BUILDING LOCATED ON ERF 160462, RIEBEEK STREET, CAPE TOWN CBD.	SIGNAGE APP	ATTERBURY INVESTMENTS HOLDINGS LTD	Principle EAP compilation & submission of application.
18/01/2013	THE PROPOSED NEW SINGLE RESIDENTIAL DWELLING ON ERF 27, CASTLE ROCK, SIMON'S TOWN	BAR	MR AND MRS HUGH AND JENNIFER HERMAN	Principle EAP: Main Author of all reports (reviewed by Doug Jeffery) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
23/11/2012	THE PROPOSED UPGRADING OF THE R304 (KOELENHOF ROAD), STELLENBOSCH.	BAR	STELLENBOSCH MUNICIPALITY	
25/09/2014	THE UNLAWFUL RECONSTRUCTION AND EXPANSION OF AN IN-STREAM DAM ON PORTION 15 OF FARM NO. 1646, TWO RIVERS FARM, FRANSCHOEK	24G	TWO RIVERS FARMS AND GARDENS (PTY) LTD	
19/08/2013	THE PROPOSED UPGRADING OF THE MEDIUM VOLTAGE DISTRIBUTION NETWORK BETWEEN CLOVELL Y AND SIMONSTOWN	BAR	CITY OF CAPE TOWN: ELECTRICITY DIRECTORATE	
16/01/2013	THE PROPOSED GREEN TECHNOLOGY MANUFACTURING CLUSTER INDUSTRIAL DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION 4 AND PORTION 1 Of FARM 1183, ATLANTIS.	BAR	CITY OF CAPE TOWN	

16/01/2013	THE PROPOSED GREEN TECHNOLOGY MANUFACTURING CLUSTER INDUSTRIAL DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON PORTION O OF FARM CA1183 AND PORTION 93 OF FARM CA4, ATLANTIS.	BAR	CITY OF CAPE TOWN	
26/09/2014	THE UNLAWFUL COMMENCEMENT OF A LISTED ACTIVITY: DREDGING OF A CHANNEL IN THE KLEIN RIVER ESTUARY, CONSTRUCTION OF A WALKWAY AND THE PROPOSED CONSTRUCTION OF A JETTYY ON PORTION 1 OF FARM NO. 723, WORTELGAT, HERMANUS	24G	HERMANUS RIVIERA ESTATES CC TRADING AS MOSAIC PRIVATE SANCTUARY	
28/05/2012	THE PROPOSED FLAT SIGN TO BE ERECTED ON THE FAÇADE OF A BUILDING LOCATED ON ERF 3316, VICTORIA STREET, SOMERSET WEST.	SIGNAGE APP	BEAV INVESTMENT HOLDINGS	<u>Principle EAP</u> compilation & submission of application.
08/02/2012	THE PROPOSED FLAT SIGN TO BE ERECTED ON THE FAÇADE OF A BUILDING LOCATED ON ERF 12715, PHILLIPI.	SIGNAGE APP	CASHBUILD	
20/02/2012	THE PROPOSED CHICKEN HOUSES ON THE REMAINDER OF FARM NO. 403, TULBAGH DIVISION AND FARM NO. 201/3, PAARL DIVISION.	NID	KLEIN VALLEI (PTY) LTD	
19/06/2012	THE THEMBOKWEZI RESIDENTIAL DEVELOPMENT ON ERF NO. 51097, KHAYELITSHA, CAPE TOWN.	AMENDMENT	OLD MUTUAL PROPERTY (PTY) LTD	<u>Principle EAP:</u> assisted by Doug Jeffery Main Author of all reports (reviewed by Doug Jeffery) Liaised with Authorities,
12/04/2011 07/03/2014	THE PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 4694 (MILKWOOD RISE), KOMMETJIE.	AMENDMENT	THE KOMMETJIE ESTATES (PTY) LTD	
25/11/2014	THE PROPOSED ESTABLISHMENT OF RESIDENTIAL ERVEN ON THE REMAINDER OF FARM NO. 948, KOMMETJIE	BAR	THE KOMMETJIE ESTATES LIMITED	
12/07/2013	PROPOSED UPGRADE AND EXTENTION OF THE WELLINGTON WASTEWATER TREATMENT WORKS.	EIA	DRAKENSTEIN MUNICIPALITY	
30/03/2011	CULTIVATION OF VIRGIN SOIL ON PORTIONS 11 AND 21 OF	BAR	SPRINGFIELD	

	FARM NO. 11.2, SPRINGFIELD ESTATE, ROBERTSON		ESTATE VINEYARDS (PTY} LTD	Organs of State, Public Consultation and Specialists Conducted PPP
25/11/2010	THE PROPOSED CHANGE OF LAND USE FROM ZONED UNDETERMINED TO ESTABLISH MALIBONGWE PARK RESIDENTIAL AREA ON THE REMAINDER OF ERF 830, PELICAN PARK	AMENDMENT	THE DEPARTMENT OF HUMAN SETTLEMENTS	
01/07/2014	THE PROPOSED UPGRADE OF THE WASTEWATER TREATMENT WORKS "WWTW" AT THE 'OLOF BERGH' DISTELLERY, GOUDINI	EIA	DISTELL (PTY) LTD	
19/10/2010	THE PROPOSED FLAT SIGN TO BE ERECTED ON THE FAÇADE OF A BUILDING LOCATED ON ERF 173335, PAARDEN EILAND.	SIGNAGE APP	FRANCIS CONSULTANTS (TOWN PLANNERS)	compilation & submission of application.
29/03/2012	THE TOWNSHIP DEVELOPMENT ON ERF NO. 56719, PHENDULA CRESENT, KHAYELITHSA.	AMENDMENT	JUBELIE PROJECT MANAGEMENT (PTY) LTD	<u>Secondary EAP</u> Main Author of all reports (reviewed by Doug Jeffery) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
08/02/2013	THE PROPOSED UPGRADE OF THE VILLIERSDORP WASTE WATER TREATMENT WORKS	EIA/ WASTE LICENSE	THEEWATERSKLOOF MUNICIPALITY	
30/01/2015	THE PROPOSED DEVELOPMENT OF A RETIREMENT VILLAGE AND ASSOCIATED INFRASTRUCTURE ON THE REMAINDER OF ERF 61, SIMONS TOWN	BAR	THE ROTARY CLUB OF CAPE TOWN	
12/05/2011	THE CONSTRUCTION OF A RESIDENCE ON ERF 52, LOVERS WALK, ROOIELS	24G	MIKE LEVETT	
24/10/2016	THE UNLAWFUL COMMENCEMENT OF LISTED ACTIVITIES: UNLAWFUL COMMENCEMENT OF LISTED ACTIVITIES TO ESTABLISH AN AGRI-PARK ON PORTION 128 OF FARM 468, STELLENBOSCH	24G	OLD ABLAND (PTY) LTD	
22/06/2011	THE RECTIFICATION OF THE UNLAWFUL CONSTRUCTION OF AN AIRSTRIP ON FARM NO. 417, GROOTVLEI, TULBAGH	24G	KARWEIDERSKRAAL TRUST	

19/11/2007	PROPOSED RESIDENTIAL DEVELOPMENT ON ERF NO. 1491, HAGLEY, BLUE DOWNS	AMENDMENT	MEIPROPS 22 (PTY) LTD	
27/07/2010	THE ESTABLISHMENT OF A SERVICE TRADE AREA ON FARM GROENFONTEIN NO. 716/16, PAARL	BAR	HELU PARK (PTY) LTD	
09/06/2010	THE DEVELOPMENT OF A RETIREMENT VILLAGE ON ERF NO.1738, MONTAGU	BAR	REALTY DYNAMIX 104 (PTY) LTD	
22/08/2011	UPGRADE OF THE DWARSKERSBOS SEWERAGE TREATMENT WORKS: PORTION 4 OF THE FARM 109 DWARSKERSBOS, BERGRIVIER MUNICIPALITY	EIA	BERGRIVIER MUNICIPALITY	
20/06/2012	THE DEVELOPMENT ON MEERENDAL PORTION 1 OF FARM NO. 159, DURBANVILLE.	BAR	MEERENDAL WINE ESTATE (PTY) LTD	<u>Secondary EAP</u> Main Author of all reports (reviewed by Doug Jeffery) Liaised with Authorities, Organs of State, Public Consultation and Specialists Conducted PPP
16/03/2011	CONSTRUCTION OF A SEWERAGE PIPELINE TO SERVE DRIFTSANDS	BAR	CITY OF CAPE TOWN	
24/11/2009	THE REZONING AND SUBDIVISION OF ERF NO. 21973, KHAYELITSHA	BAR	NU-WAY HOUSING DEVELOPMENTS (PTY) LTD	
24/11/2010	DAL JOSAFAT DEVELOPMENT ON ERF NO. 16161 AND REMAINDER OF ERF NO. 17680, PAARL	EIA	ERF 16161 PAARL DEVELOPMENT (PLY} LID	
21/07/2009	THE PROPOSED USE AND/OR DISPOSAL OF SEDIMENT FROM ZEEKOEVLEI, CAPE FARM NOS. 848-0, 840-1, 847-01, 846-0, 844-31, 837-0, 838-0 AND ERF 93284, ZEEKOEVLEI NATURE RESERVE	BAR	CITY OF CAPE TOWN	

ANNEXURE 2: LOCALITY PLAN



Locality Map: Erf 1097, WWP Upgrade

Legend

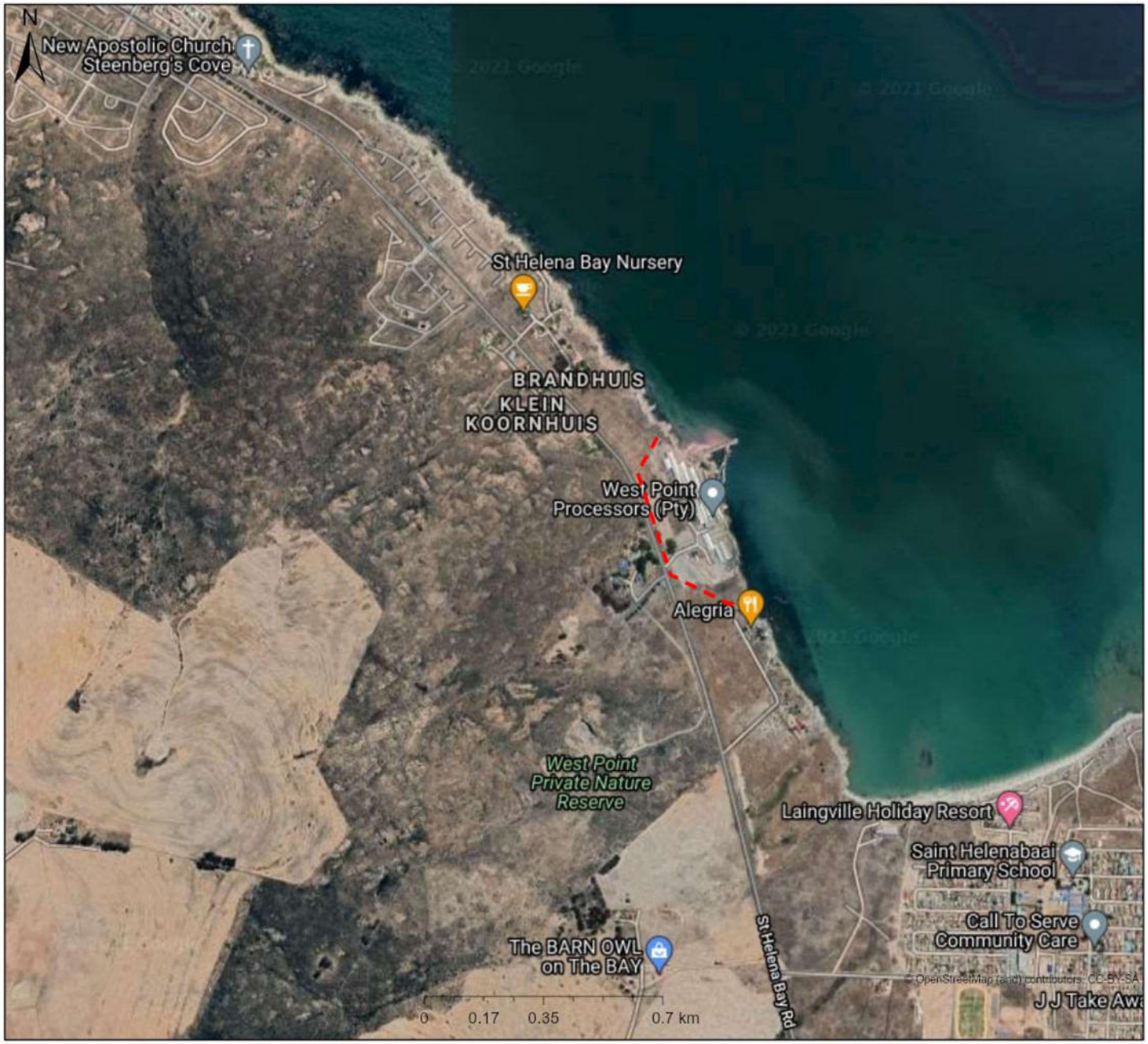
The site

PHS CONSULTING

Scale: 1:144 448

Date created: October 5, 2021

S 32° 46' 36.99"
E 18° 02' 58.34"



Locality Map: Erf 1097, WWP Upgrade

Legend

The Site

PHS CONSULTING

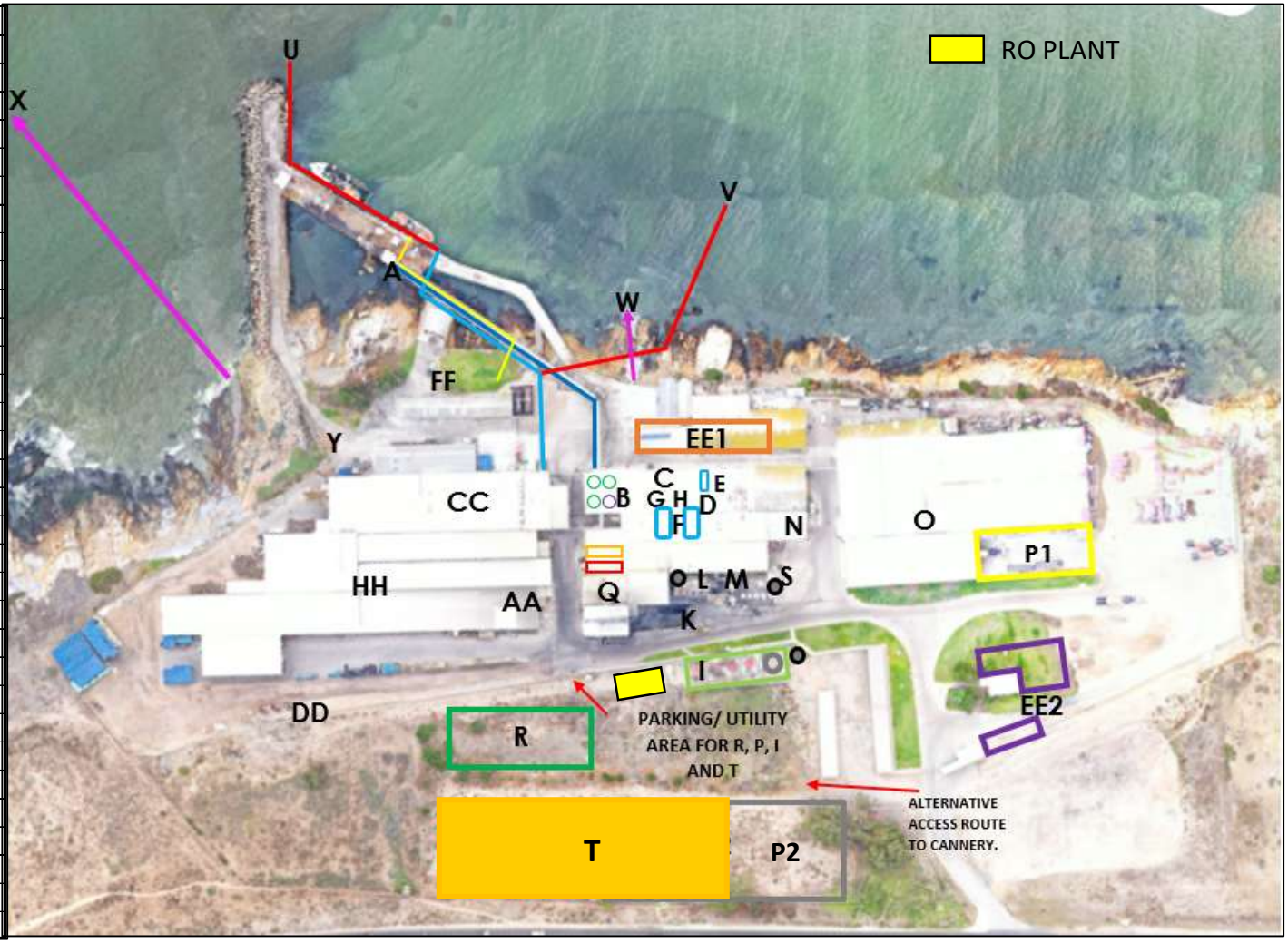
Scale: 1:18 056

Date created: October 5, 2021

S 32° 46' 36.99"
E 18° 02' 58.34"

ANNEXURE 3: SITE DEVELOPMENT PLAN

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	Woody Biomass Storage / Cold Storage
S	MVA Eskom Electricity Supply
T	Reservoirs: Water storage
U	Alternative 1: Extended (red) Abstraction Pipeline
V	Alternative 2: Extended (red) Abstraction Pipeline
W	Existing coastal water discharge Outfall A (emergency)
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 4: WASTE MANAGEMENT PLAN

SITE WASTE MANAGEMENT PLAN

St Helena Bay

By

PHS Consulting

For:

WEST POINT PROCESSORS

November 2021

cell: 082 7408 046 | tel: (028) 312 1734 | fax: 086 508 3249 |
paul@phsconsulting.co.za |P.O Box 1752 | Hermanus 7200

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3. AIM OF PROJECT	4
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FIGURE 1: SITE PLAN

SITE WASTE MANAGEMENT PLAN INTRODUCTION

Construction and demolition (C&D) waste materials make up, between 35% to 45% of what goes into landfills sites. The remaining 65% to 55% relate to operational (O) waste. This contributes to the reduced life of landfills, operations and maintenance costs, as well as environmental impacts. Diverting C&D and O waste avoids the costs of new landfills, and can support local businesses that can use C&D and O waste material as a resource.

West Point Processors (WPP) can effectively manage C&D and O waste disposal by requiring contractors to create a Site Waste Management Plan that identifies:

- The construction & demolition, production and operation waste materials that will likely be generated on a site
- The procedures that will be used to collect and sort the waste materials
- Who will haul away the waste material
- The location to which the materials will be hauled
- How the materials will be reused or recycled

1. BACKGROUND

PHS Consulting was appointed by WPP to compile a Site Waste Management Plan (SWMP) as part of the:

- Environmental Requirements after a DEA Audit
- This SWMP will form an addendum to the sites Operational Environmental Management Plan (EMP)

The continued infrastructural upgrade works and the process operations at the plant are relevant to this plan. The site is located at Slipper Bay in the St Helena Bay area, in the Saldanha Municipal area on the West Coast of South Africa.

The operation is in process for more than 65 years old and when developed it did not consider future requirements of a modern operation. Due to this, upgrade works of the on-site process equipment and operational procedures are required. New infrastructure and management actions also relate to the proposed changes on site. Waste generation is associated with these actions and therefore a plan is required to ensure an environmental compliant site.

2. NATURE OF PROJECT

The general process entails the operation of a fish meal processing plant producing fish meal product. Production relates to Total Allowable Catch approved by Regulatory Authorities and fish off cuts from the cannery process.

Fishmeal is produced by processing raw pelagic fish by using the following unit processes:

- Cooking
- Pressing
- Drying in rotary driers
- Dry-milling
- Packing

The fish oil is further treated using oil separation in centrifuges

Scope of project:

- Upgrading of Plant as per Environmental Authorisation
- Manage Plant as per the requirements of the National Environmental Management Waste Act
- Construction/Demolition waste management
- Production waste management
- Facilities management
- Impact management

Good access and an internal road system exist on site therefore waste collection vehicle movements will result in limited to no traffic impact.

The site has ample area that will be utilised for waste segregation, recycling and temporary storage. Therefore the open area to the east of the fish meal store building will be regarded as the bulk segregation and temporary storage zone, from where non household waste will be loaded and removed. All household and general waste will be dumped in the on-site skips located on the western side of the site behind the cannery. From here the municipal waste truck collect the waste on a daily/weekly basis.

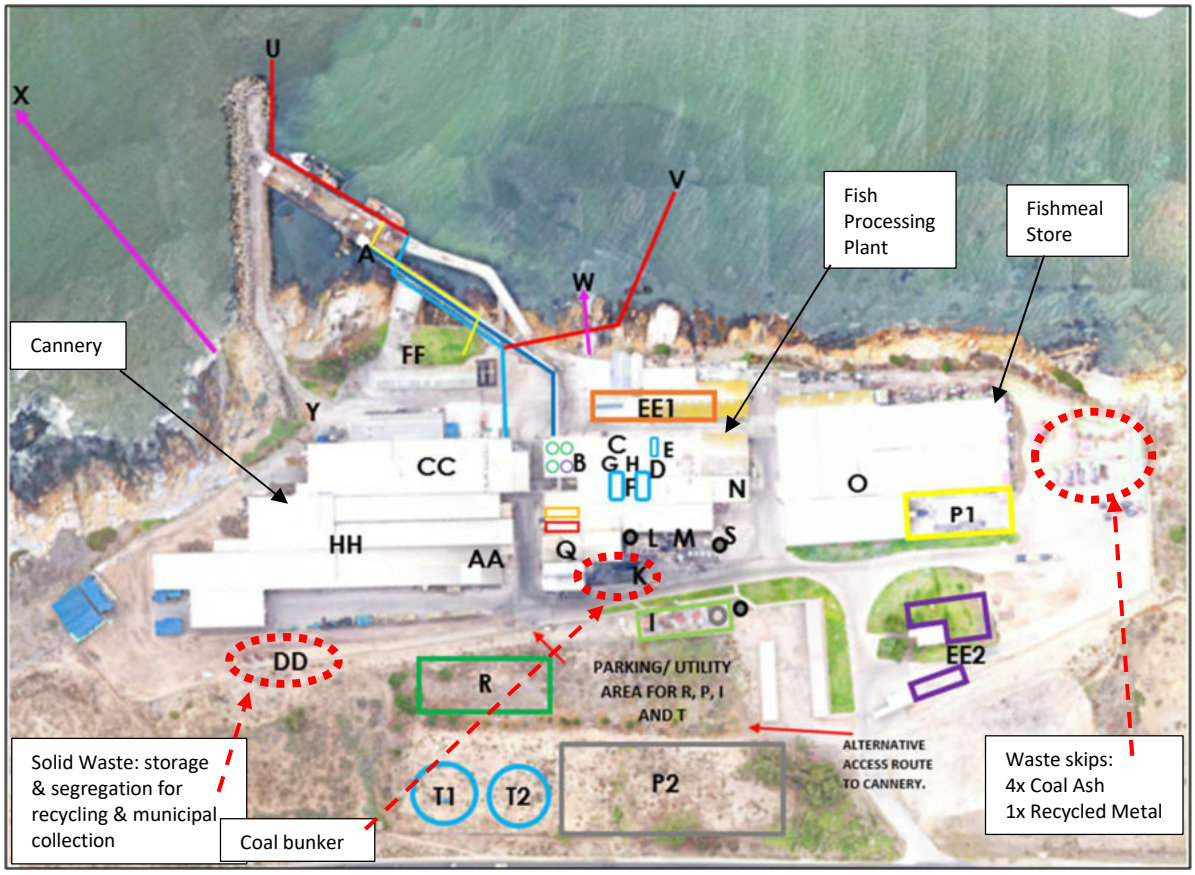


Figure 1: *Site Plan (Red dotted arrows and red dotted circles indicating the main waste areas/ streams on site).*

3. PROJECT AIM

WPP are committed to implement the project Site Waste Management Plan (SWMP) so that it is effective, accurate and economical and ensure that the procedures put into place are working and are maintained. The aim is to minimise waste and the reduction of waste pollution.

4. MANAGEMENT

The Environmental Control Officer (ECO) is the co-ordinator of waste management and as such is responsible for ensuring the instruction of workers, implementation and overseeing of the SWMP. The ECO will monitor the effectiveness and accuracy during the routine site visits. Copies of these reports will be forwarded to Management for monitoring purposes.

5. DISTRIBUTION

The ECO shall distribute copies of this plan to all relevant parties and the competent authority if required. This will be undertaken every time the plan is updated.

6. INSTRUCTION AND TRAINING

The ECO will provide on-site briefing via induction of appropriate separation, handling, recycling, re-use and return methods to be used by all employees and parties and at appropriate stages of the Project where applicable. Talks will be carried out regularly on waste issues and all staff and subcontractors will be expected to attend at the start of any project phase. This will ensure that everyone feels they are included and that their participation is meaningful.

7. WASTE MANAGEMENT ON SITE

Surplus or waste materials will arise from the materials generated on site. Generated materials are those, which exist such as general process and household waste. These waste items gets dumped in the waste skips and removed from site by the municipality. Demolition, construction, effluent, product, process and hazardous waste will have to be managed.

However, there are other considerations to waste management such as waste reduction, segregation of waste, disposal of waste, financial impacts of waste disposal and recording, monitoring, education and reviewing. This plan outlines the procedures that have been put in to place and demonstrate how they benefit the environment and how we can measure the effects and how these procedures and practices are sustainable.

8. WASTE SEGREGATION ARRANGEMENTS

Two waste management areas exist on site:

1) The area indicated to the southeast of the site contains 4 skips for the temporary storage of coal ash until it is collected. A fifth skip collects any metals that can be recycled.
2) A specific area (northwest - DD) was identified to facilitate the separation of materials for potential recycling, reuse and return. The skips in this area will collect any municipal waste that cannot be recycled, reused or returned. Recycling and waste areas are to be clearly marked in order to avoid contamination of materials. If the skips/areas are clearly identified the bulk of the workforce will deposit the correct materials into the correct skip/area. The municipality will collect all municipal waste from this area.

All waste management activities should preferably be contained on hard surfaces only. The coal bunker is contained. The existing internal roads and parking areas are large enough to handle and contain all activities and transport requirements on site.

Collection vehicles and trucks will enter the site as per current main entrance point.

Figure 1 above illustrate the site plan indicating the zones for locating the waste type skips and temporary storage areas.

Table 1 below indicate the waste types to be produced and segregated on site.

Waste Types	Origin	Classification
General construction (brick, timber, metal)	Construction works	General
General demolition	Demolition	General
Timber	Demolition	General
Metal	Demolition	General
Cannery general	Cannery	General
Household General	Plant wide	General
Plastic	Plant wide	General
Glass	Plant wide	General
Process Effluent	Processing Plant	Dealt with in terms of CWDP
Vessels General	Vessels	General
Coal & Fly Ash	Coal bunker	Hazardous

Table 1: Waste Types

9. WAYS OF MINIMISING WASTE

From a very early stage the ECO needs to look at how to manage the waste generated, thereby reducing the amount of waste to be removed from the project site.

Waste materials fall into three categories for management, these are:

- Re-use
- Recycle
- Landfill

Re-use: If surplus materials can be used in the future site works they are classified as re-use materials. If they are surplus to requirements and need to be removed from site and they can be removed and used in their present form, they can be removed from site for re-use.

Recycling: If the surplus material cannot be re-used in its present form but could be used in a different form, it is sent for recycling.

Landfill: If either of the above cannot be satisfied then the only option left is to send the surplus materials to landfill.

10. WASTE STREAMS

The waste stream to be generated by the demolition project will consist of the following:

Waste Types	Management and Handling
General construction (brick, timber, metal)	Re-use / Recycle/Landfill
General demolition	Landfill
Timber	Re-use / Recycle
Metal	Re-Use/ Recycle
Cannery general	Municipal landfill
Household General	Recycled/ Municipal landfill
Plastic	Recycled
Glass	Recycled
Process Effluent	Part of Coastal Water Discharge permit
Vessels General	Municipal landfill
Coal & Fly Ash	Contained and removed, recycled for use in brickmaking

Table 2: Waste Streams and Handling

11. ADDITIONAL ACTIONS AND CRITERIA

Only Saldanha Bay Municipal, West Coast District Municipal and City of Cape Town registered service providers will be contracted to remove and recycle waste from the site. The following City of Cape Town Landfill sites will be used to deposit waste that can't be recycled or re-used or accommodated at the Vredenburg landfill site.

- Vissershok site is off the N7 into Frankdale Road, adjacent to Morningstar. *All dangerous good will be transported to the Vissershok site.*

On site recycled bins or material stockpiled in allocated zones, will be collected by registered recycling specialist. If not collected by recycling contractors then the recycled waste will be transported to the Vredenburg Landfill site.

Specialist Waste removal companies such as Enviroserve and Wasteman can be used for dangerous or contaminated waste.

All waste will be removed from site within a 1 month period after on site re-cycling or temporary storage. General waste will be removed on a weekly basis.

12. IMPACTS ASSOCIATED WITH WASTE

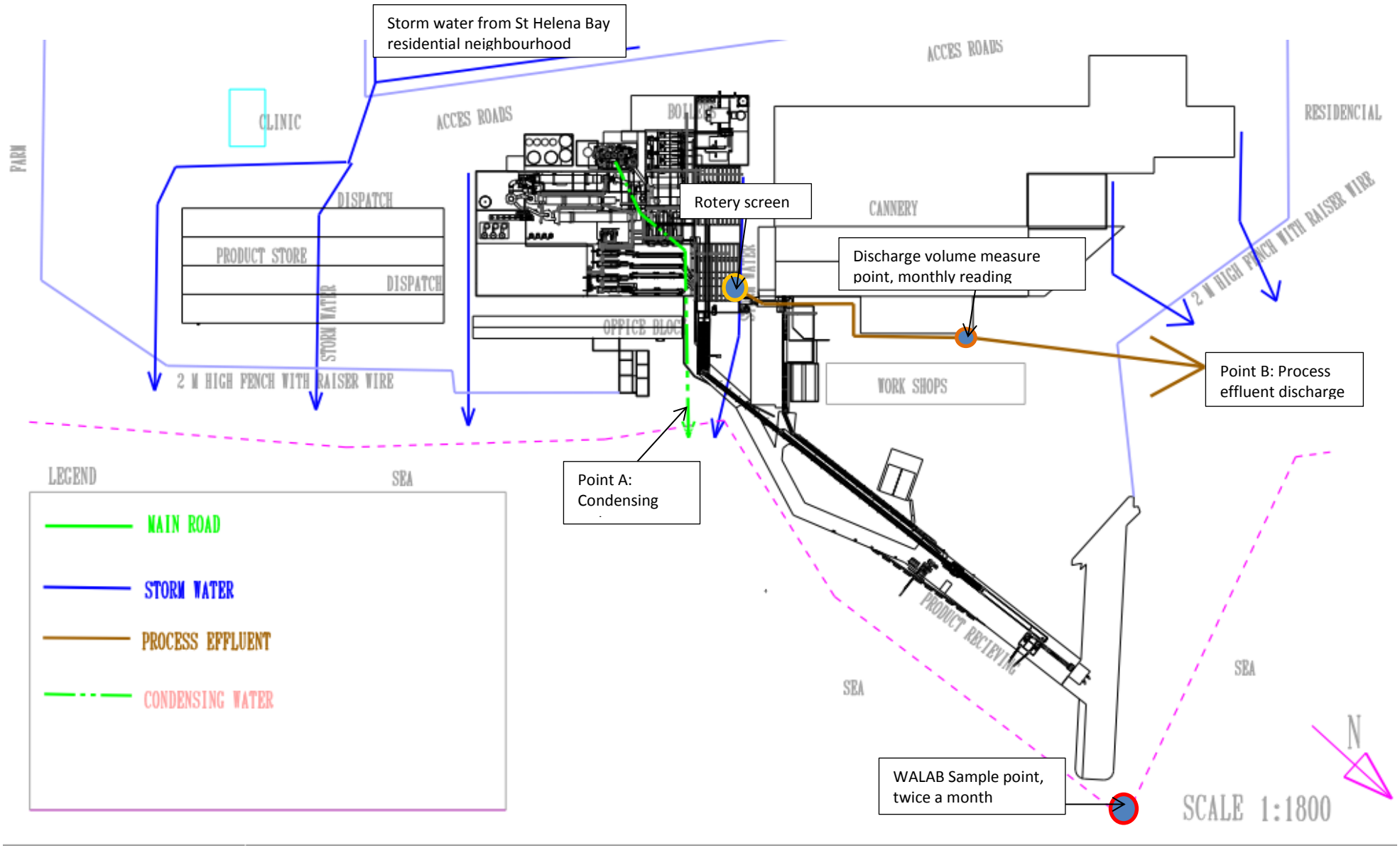
Potential Impact	Mitigation and Management Action
Effluent Pollution of Ocean	Ensure that the requirements of the Coastal Water Discharge Permit are implemented.
Dirty storm	Implement and maintain waste traps in storm water channels. Develop hard

water	surfaces next to storm water channels.
Accumulation of waste	Make sure separation and temporary storage area is cleared at least every month and the general waste skips cleared weekly.
Leaching of waste effluent	Ensure hard surface for separation and temporary storage area, and ensure that enough skips are available for general household waste.
Coal ash not removed	Temporary stored on solid concrete slab and removed within a month
Cleanliness of public areas and roads	All trucks or vehicles transporting waste material will be required to secure and cover all loads with shade cloth to avoid debris or plastic etc. that can blow or fall on public roads or areas
Records	Waste manifest must be collected for the coal ash and any other specialised waste

13. WASTE MANAGEMENT CHECKLIST

Action/Task	Yes	No
Has all the waste stream been identified?		
For offsite or disposal are all the waste destination details verified?		
Was registered service provider registrations for waste removal companies been verified?		
List the registered service provider (waste carrier) to be used: 1. 2. 3. 4. 5. 6. 7.		
Specify waste destinations and permits of waste en destination 1. 2. 3. 4. 5. 6. 7.		
Has entrance /exit control been setup?		
Has a waste segregation / collection area been prepared?		
Has the waste area been adequately sign posted?		
Has the SWMP document been circulated to all parties, contractor and subcontractors?		
Have all the SWMP training / induction procedures for staff been met?		
Further Action		
Include Site Waste Management Plan within future tender Documentation		

ANNEXURE 5: STORM WATER AND EFFLUENCE DIAGRAM


Storm water from St Helena Bay residential neighbourhood
CLINIC
ACCES ROADS
ACCES ROADS
RESIDENCIAL
PARK
DISPATCH
PRODUCT STORE
DISPATCH
STORM WATER
Rotery screen
CANNERY
Discharge volume measure point, monthly reading
2 M HIGH PENCH WITH RAISER WIRE
2 M HIGH PENCH WITH RAISER WIRE
OFFICE BLOCK
WORK SHOPS
Point B: Process effluent discharge
Point A: Condensing
LEGEND
SEA
MAIN ROAD
STORM WATER
PROCESS EFFLUENT
CONDENSING WATER
PRODUCT RECIEVING
SEA
SEA
WALAB Sample point, twice a month
N
SCALE 1:1800

ANNEXURE 6: CONTINGENCY PLAN

CONTINGENCY PLAN

THE WEST POINT PROCESSORS FISH PROCESSING PLANT ON ERF 1097/3, ST HELENA BAY.

AUGUST 2025

Version 1

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1. INTRODUCTION:

Environmental Authorisation was granted in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) to West Point Processors (WPP) on the 22 November 2010 for the proposed upgrading of the fish processing plant on Portion 3 of Erf 1097 in St. Helena Bay, Western Cape. The fish processing plant has been operating since 1947. The plant manufactures canned fish and fish meal. In addition, the plant also produces fish oil and stickwater during the fish meal process.

In compliance with the EA a Coastal Waters Discharged Permit (CWDP) was applied for and granted to WPP on the 26 June 2017 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. A Provisional Atmospheric Emission Licence (PAEL) in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) was also granted to WPP by the West Coast District Municipality (WCDM) and an Atmospheric Emissions Licence (AEL) was issued (8 November 2019) to WPP for proving compliance with the PAEL.

According to Condition F10 of the CWDP a Contingency Plan needs to be compiled. Contingency plans and mitigating actions are required to prevent and minimise the risks to the environment in the event of malfunctioning equipment, plant failure, accidental spillage or other incidents. The Contingency Plan may also be aligned with the company's Occupational Health and Safety policies or Emergency Response procedures.

In accordance with the CWDP the Contingency Plan needs to include/ address the following aspects:

- Include Standard Operating Procedures for the detection of problems and responding to emergency incidents & upset conditions;
- Provide feedback for continual improvement in environmental performance;
- Identify a range of mitigation measures which could reduce the potential impacts to minimal or significant levels;
- Detail specific actions deemed necessary to assist in mitigating the environmental impact of the project;
- Identify measures that could optimize beneficial impacts; and
- Create management structures which address concerns and complaints.

2. SITE/ PLANT INFORMATION:

Saldanha Bay Municipality is a local municipality located within the West Coast District Municipality, in the Western Cape. St Helena Bay serves as a major node for industrial and small-scale fisheries on the west coast (mostly sardine and anchovy) and supports three small pelagic fish processing plants, namely; Oranjevis Joint Venture, Lucky Star and West Point Processors. WPP is located northeast of the settlement of Laingville in St Helena Bay. The effluent generated by the WPP fish processing plant consists of cooling water and fish processing effluent discharged via two coastal outfalls, Pipeline A&B.

Pipeline A discharges a maximum volume of 18 000 m^3 effluent per day. This effluent consists of seawater used to spray down the fish meal processing equipment for cooling as well as fresh water used to oxidise non-condensable components in the chemical scrubber. Pipeline B discharges a maximum volume of 8 000 m^3 of fish processing effluent per day. This discharge consists of seawater and freshwater used to transport fish onto the cutting tables and for the cleaning of equipment after production. The effluent from this pipeline contains suspended solids, fat, oil and grease, ammonia nitrogen, protein, and phosphate. The effluent passes through a screen filter of 500 micron to remove solids. The remaining effluent is discharged to the inshore marine environment via a closed channel and the solids are removed to a fishmeal processing plant on site. Please refer to Figure 1 below showing the wastewater and storm water flow on site as well the outfall of Pipeline A and B.

All institutions that discharge effluent into the ocean must be in possession of a permit issued by the Department of Environmental Affairs (DEA). This CWDP specifies the regulations that are applicable to each establishment responsible for effluent discharge. Amongst other things each CWDP dictates the limits that laid down parameters must adhere to and the sampling frequency that must be implemented by the responsible institution. It is the permit holder's responsibility to adhere to the limits set by DEA and as stipulated in the CWDP.

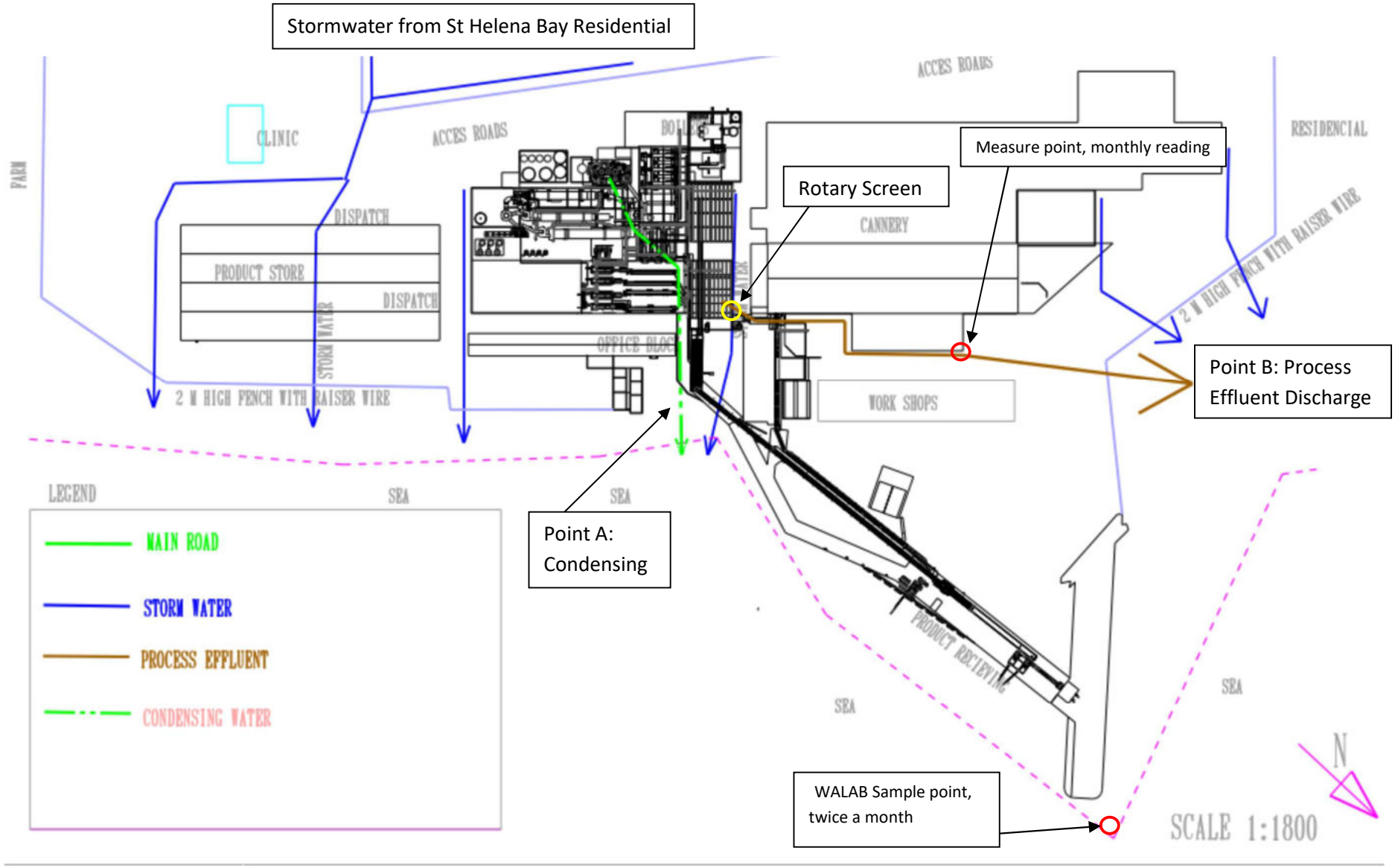


Figure 1. *The Wastewater and Stormwater flow on site as well the outfall of Pipeline A and B.*

3. LEGISLATIVE FRAMEWORK:

According to Chapter 7 of the NEMA, section 28 (1):
"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 as 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". Furthermore, section 58 of the ICMA places a duty to avoid causing adverse effects on the coastal environment on all individuals who undertake activities that may cause significant pollution or degradation of the environment. The following list of legislation plays a prominent role within the discharge of waste water to the sea but is by no means exhausted.

3.1 The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (ICMA)

The ICMA establishes a system of integrated coastal and estuarine management in the Republic, including norms, standards and policies, in order to promote the conservation of the coastal environment, and maintain the natural attributes of coastal landscapes and seascapes, and to ensure that development and the use of natural resources within the coastal zone is socially and economically justifiable and ecologically sustainable. The ICMA addresses a number of issues relating to coastal pollution, one of which is the discharge of effluent into coastal waters (specifically municipal and industrial effluent). The ICMA allows for general authorisation or permits to be issued in this regard.

3.2 The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM: WA)

The NEM: WA regulates waste management in order to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development. It provides for institutional arrangements and planning matters; national norms and standards for regulating the management of waste; and specific waste management measures. It also provides for the licensing and control of waste management activities, the remediation of contaminated land and a national waste information system. It also deals with issues of compliance and enforcement.

The DEA administrative process for issuing a CWDP entails a validation step which includes an assessment of all other licence/permit/authorisations requirements.

3.3 The National Environmental Management Act (NEMA): Environmental Impact Assessment (EIA) Regulations of 2014, as amended

South Africa's new EIA Regulations signalled the start of the official implementation process of a new regime aimed at improving the efficiency and effectiveness of the EIA regime. EIAs are a pro-active and systematic process where potential environmental impacts both positive and negative associated with certain activities are assessed, investigated and reported. The process contributes to giving effect to the objectives of integrated environmental management as decision-makers are informed of the

desirability of such activities as well as the conditions under which authorisation of the activity should be subject to, where relevant.

The EIA Regulations, 2014 seek to streamline the EIA process. It also introduces an approach where impacts associated with the sensitivity of the receiving environment are treated with more care. This is achieved through the introduction of a listing notice (LN) dedicated to activities planned for predefined sensitive areas. The Gazette Number (GNR) 324 of 7 April 2017 contains the LN 3 which lists activities in specified geographical areas. The LN1 appears in the GNR 327 of 7 April 2017 and LN2 in the GNR 325 of 7 April 2017.

As in the case of the NEM: WA, the DEA administrative process for the issuing of a CWDP entails a validation step which includes an assessment of all other licence/permit/authorisations requirements.

3.4 National Programme of Action for the Protection of the Marine Environment from Land-Based Activities (NPoA)

In 2008, the DEA developed an NPoA to give effect to the Global Programme of Action as an international treaty. South Africa is a signatory to the Washington Declaration which formalised the GPA in 1995 and is therefore obliged to undertake national action that is consistent with the commitments enshrined in the GPA. Although the NPoA is not a legal document, it is nevertheless relevant as it recommends several actions that would contribute toward the management of marine pollution from land-based sources.

3.5 National Guideline for the Discharge of Effluent from Land-based Sources into the Coastal Environment, 2014

The goal of this guideline for the discharge of effluent to the coastal environment of South Africa is:
"To achieve coastal water quality that is fit for use and a healthy aquatic system that is maintained on a sustainable basis while allowing for justifiable social and economic development. This will be achieved in accordance with the hierarchy of decision-making of water quality management, namely:

- *Prevention of waste;*
- *Minimisation of waste; and*
- *Responsible disposal."*

As stated in the aforementioned Guidelines document: *"Any authority or industry responsible for the operation and management of a marine disposal system will be required to prepare contingency plans pertaining to maintenance shutdowns, failure in operations or disasters."*

4. POTENTIAL RISKS/ CAUSES AND IMPACTS:

The objective of this section is to determine the nature and risk by analysing potential hazards and evaluating existing conditions of vulnerabilty that could pose a potential threat or harm to people, property, lievlihoods and the environment on which they depend.

TABLE 1: *Potential Risks and Impacts.*

	RISK/ CAUSES:	IMPACTS:
Hazard 1	Power failures or Interruptions.	Power disruptions to pumps transferring wastewater. Overflow of wastewater resulting in surface water pollution. Lack of oxygen supply or slowdown in production could result in anaerobic conditions leading to odour generation.
Hazard 2	Floods as a result of storms or natural disasters.	Inundation of wastewater storage, treatment and disposal system by floodwaters resulting in the pollution of surface water.
Hazard 3	Accidental damage or rupturing of tanks or containers storing wastewater or similar substances by i.e. forklifts.	Escape or spillage of products to surface water resulting in pollution of surface or groundwater.
Hazard 4	Failure of pumps, pipes, valves and fittings.	Escape or spillage of product (or wastewater) to surface water. Pollution of surface waters.
Hazard 5	Accidental spillage or discharge of hazardous substances or materials during loading, unloading or handling.	Escape of hazardous substance to storm water drains. Pollution of surface waters. Release of toxic materials to coastal water discharge outlets resulting in pollution.
Hazard 6	Vandalism.	Damage to equipment or holding tanks could result in the escape of toxic products or wastewater as well as the Escape of fumes and gases.
Hazard 7	Accidental discharge of diesel, petrol, hydraulic liquid due to human or system errors, equipment damage, breakdown or faults.	Water pollution caused by hydrocarbons that degrade water quality and can harm wildlife and vegetation
Hazard 8	Poor wastewater quality discharged to sea.	Contamination of water resources and contravening the CWDP. This could result in hypoxia (reduced oxygen) that has secondary negative impacts on the marine environment such as changes in the composition of benthic communities.
Hazard 9	Emergency Evacuation: i.e. Bomb threat, Civil Unrest or Fire.	Please refer to the Emergency Preparedness Plan (**Appendix A**) for Emergency procedures in terms of an Evacuation.

5. PLANNING AND PREPARATION

This is the action carried out before a disastrous event occurs to adequately prepare for the disastrous event and involves planning, organisation, equipping, training, exercises and the building of awareness. Also refer to Section 8.

5.1 Equipment:

Equipping stakeholders with the right equipment to respond when needed is vitally important. Departments are responsible for maintaining emergency supplies and equipment at each work site. An employee needs to be assigned to review and restock supplies annually or as the need arises [Dudley Lesch- 079 155 5331]. Please refer to **Appendix B** for a list of equipment requirements, quantities and the management thereof.

5.2 Stakeholders involved: Roles and responsibilities:

Most incidents that occur at the plant are small and can be dealt with in-house or by an appointed contractor. Should the incidents occur larger than WPP own capabilities, outside local, regional or national assistance will be required. A two-tier response system will therefore be put in place. The decision to progress from one tier to the next lies with the WPP General Manager – Marthin Potgieter in close consultation with the DEA and will be based on the prevailing circumstances at the time of the incident.

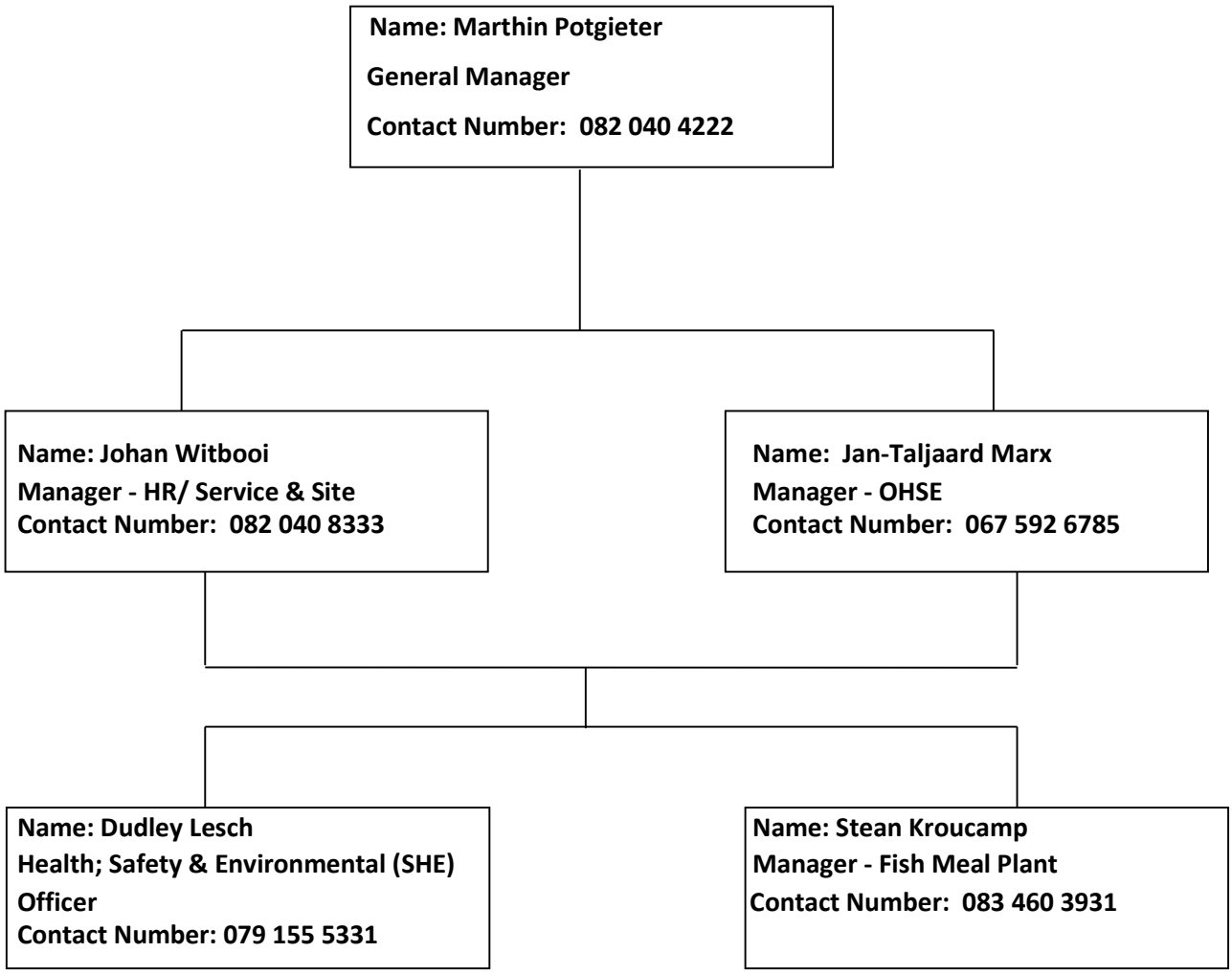
The tiers are specified as follows:

- **Tier 1:** Tier one can be handled by the contractor and its facilities. The incident has no impact outside the operational area but poses a potential emergency condition.
- **Tier 2:** Tier two means that the incident has occurred outside of the plant or that the incident has spread outside the plant. Probability of causing a level of environmental and human health problems.

Regardless of size however all pollution incidents must be immediately reported to DEA.

5.2.1 Chain of Command WPP:

During and immediately following a disaster, the following key staff included in the line of succession, will have decision-making authorization for the department/division.



The Contingency Plan must be distributed to all personnel working on the site and the SHE Manager will be the designated responsible person.

Furthermore, the SHE control officer must ascertain that all emergency contact numbers (first aid officers, ambulances, fire brigade, police, hospital etc.) are conveniently posted at several site notice boards in order to assist in the event of an emergency. The comprehensive list is included in **Appendix C** and should be updated reviewed and updated annually or as changes are effected on WPP site.

TABLE 2: Emergency Numbers

EMERGENCY NUMBERS

Detail/Description	**Contact Number/s**
Security Non-Emergency	081 025 1436
Reception	X200/9
SHE Manager	067 592 6785
Environmental Control Officer	079 155 5331
Police – St. Helena Bay	022 736 8060 (Short Code:5571)
Fire Department – Vredenburg	022 703 6100
Medical Emergency	022 736 1100 / 083 761 0537
West Coast Private Hospital	022 719 1030 (Short Code: 5673 / 5111)

Vredenburg Private Hospital	022 709 7200 (Short Code: 5673 / 5121)
Ambulance Service	10177
Emergency Co-ordinator	Jan-Taljaard Marx
HR Service and Site Manager – Johan Witbooi	022 736 1100 / 082 040 8333
Fishmeal Operational Manager – Stean Kroucamp	022 736 1100 / 083 460 3931
Site Clinic – Sr. N. Erasmus	079 605 4425

5.2.2 Staff Assignments:

The following tables represent key personnel from each department's personnel resources that would play pivotal roles within the Contingency Plan. The tables also assign specific duties, during and immediately following a disaster to key staff and identify staff with special expertise or training, who could offer assistance when necessary, e.g. Search & Rescue, First Aid, Radio Operators, etc.

Building Coordinator: *designated by the department/division as the primary emergency contact for the building; responsible for implementation of the emergency action plan; assists with the safe evacuation of the work area (with assistance of floor wardens); assesses injuries and damage to the work area personnel/property and reports status to the SHE Manager.*

Alternates: *individuals assigned as back-ups to specific emergency response positions.*

TABLE 3: Key Staff Assignments – HOD's and Supervisors

	KEY STAFF	LOCATION	Position
1	Jan-Taljaard Marx	OHSE Office	OHSE Manager
2	Johan Witbooi	HR Office	HR and Site Manager
3	Dudley Lesch	OHSE Office	SHE Officer
4	Brian Afrika	Cannery Department	Canning Department
5	Stean Kroucamp	Fish Meal Plant	FMP Manager
6	Dennis Griffiths	FSQ Department	FSQ Manager
7	Owen Buziek	Labelling and Despatch	Labelling and Despatch Sup.
8	Adrian Constable	Maritime Workshop	Fleet Technical Manager
9	John De Villiers	Finance Department	Finance Manager
10	Mike Olwagen	Boilers	Boiler Manager-John Thompson
11	Hycinth Brown-Dirkse	FSQ Department	FSQ Food Safety Officer
12	Willem van Wyk	Pick-up Section	Pick-up Superintendent
13	Donovan Sampson	Labelling Department	Labelling Superintendent
14	Johannes Karolus	Cannery Department	Cannery Supervisor
15	Laetitia Claassen	Fish Meal Plant - HACCP	FMP: HACCP Manager
16	Diavre George	Fleet Department	Offshore Skipper

17	Junita Vermeulen	Labelling and Despatch	Labelling and Despatch Manager

a) Building Coordinator and Alternates:

***TABLE 4**: Building Coordinator and Alternates.*

	NAME	LOCATION	TELEPHONE
1	Donovan Williams Francis Snyders	Cannery	022 736 1100
2	Naidene Cloete Melikhaya Fikizolo	Jetty/Harbour	022 736 1100
3	Donovan Sampson Jerhoriano Goliath	Labelling/ Pickup/ Dispatch	022 736 1100
4	Johannes van Wyk	Boiler Room	022 736 1100
5	Pierre Julius Francois Gana	Fish Meal Store & Bulk Meal Store	022 736 1100
6	Godfrey Mayalo	Work shops	022 736 1100
7	Dewald van Vuuren	Administration	022 736 1100

b) Fire Wardens:

***TABLE 5:** Fire Wardens.*

NAME	LOCATION / DEPARTMENT	TELEPHONE
Clinton Abdol	Labelling	083 976 0326
Allistair Kuilders	Cannery	072 523 9177
Andrea Makka	Cannery	068 688 6599
Aviwe Khese	Cannery	068 431 4856
Girshwin Lategan	Cannery	073 787 3328
Nofonta Sonwabile	Cannery	083 794 8935
Jacques Saal	Cannery	078 162 5195
Ebrain Pedro	Despatch	081 550 1210
John-Dre Huyster	Cannery	078 629 3505
Denzil Jantjies	Labelling	071 714 0207
Ruben Kawe	Labelling	073 399 5248
Ricardo Cedras	Labelling	083 387 7867
Xolani Nofonta	Labelling	061 730 1313
Charlton April	Pick-up	078 875 5029
Dibuseng Mothapa	Pick-up	078 867 5280

Macnine Gampe	Pick-up	079 017 7781
Andile Fipaza	Fishmeal Plant	078 187 4914
Dominique van der Colff	Fishmeal Plant	071 168 3586
Elton Adams	Fishmeal Plant	079 087 9930
Gillroy Owies	Fishmeal Plant	083 792 4421
Patrick Qegu	Fishmeal Plant	078 331 8857
Simphiwe Gxoko	Fishmeal Plant	078 037 7945

5.3 Communication:

Management shall establish and maintain procedures for the internal communication between the various levels and functions of the organisation, and receiving, documenting and responding to relevant communication from external interested & affected parties. The organisation shall consider processes for external communication on its significant environmental aspects and record its decision. Communication is a management responsibility. All supervisors are responsible for effective communication within their own sections. Environmental communication can be divided into two categories, namely internal communication and external communication.

5.3.1 Internal Communication

The following communication channels and media will/can be used to communicate environmental issues:

- WPP Weekly Management Meetings: The SHE Manager communicates information to senior management on environmental issues.
- Monthly HSEC Meetings: Environmental issues should be an agenda item on plant and section monthly safety, health & environmental meeting agendas.
- Publications: Leaflets, posters etc are produced by the relevant department or other designated persons.
- Daily/ Weekly Safety Meeting: All meetings are scheduled to commence with a discussion on safety, health & environmental topics.

5.3.2 External Communication

The following communication channels and media will/can be used to communicate environmental issues to individuals who are not employed:

- Publications: Selected publications should be produced and used to communicate environmental issues to outside parties. Examples include newsletters and Annual Reports.
- E-mail: E-mail communication received must be stored, with replies, in an appropriate folder on a server. E-mail messages, relevant to environmental management, should be kept for a minimum of two years before deletion.
- Mail: Correspondence received by mail must be filed, along with the response (where relevant), within the relevant department's filing system for a minimum period of 2 years. Paper correspondence will be archived in this department.

- Telephone: A register of telephonic environmental queries should be kept by the relevant department detailing caller, contact details, date, query, action taken and response. Furthermore, the person answering the call will be responsible for logging their particulars against the call, as well as ensuring that all communication that leads to an aspect or an impact, is entered on the database.
- Storage of Correspondence: All original correspondence must be retained by the Plant Manager for a minimum period of two years.
- Environmental Reports: Copies of relevant specialist study reports and Environmental Impact Assessments will be made available by the Plant Manager should these be requested by an external party.
- Queries from Interested and Affected Parties: Response to queries about environmental impacts and aspects will be addressed by the relevant department, and approved by the Plant Manager.

6. RESPONSES AND TREATMENT TO POTENTIAL HAZARDS

6.1 Incident Reporting Structure

Environmental incident reporting is a vital part of communication. Employees are required to report any and all environmentally related problems, incidents and pollution, so that the appropriate mitigating action can be implemented timeously. Table 5 identifies the procedure to be followed by key staff when reporting and responding to an incident.

TABLE 5: ENVIRONMENTAL INCIDENT REPORTING PROCEDURE.

ENVIRONMENTAL INCIDENT REPORTING STRUCTURE	ACTION REQUIRED
Line Management in relevant area of responsibility where the incident occurred	Shall investigate the incident and record the following information (refer to the Incident Report Template – **Appendix D**): • How the incident happened; • The reasons the incident happened; • How rehabilitation or clean up needs to take place; • The nature of the impact that occurred; • The type of work, process or equipment involved; and • Recommendations to avoid future such incidents and/or occurrences. Shall inform the SHE Manager /Plant Manager on a daily basis of all/ any incidents that were reported in the area/section. Shall consult with the relevant department / person for recommendations on actions to be taken or implemented where appropriate (e.g. clean-ups). Shall assist the SHE Manager and/or Plant Manager with applicable data in order to accurately capture the incident into the reporting database.

Area / Line Managers	Shall forward a copy of the incident form to other line managers. Shall forward a copy of the incident form to the SHE Manager / Plant Manager. Shall inform the relevant department / person on a weekly basis of the incident by e-mail or by submitting a copy of the incident report. If a High Risk (Tier II) Incident (any incident which results from a significant aspect and has the potential to cause a significant impact on the environment) occurred it must be reported immediately to the SHE Manager /Plant Manager by telephone or email to ensure immediate response / action. Shall forward a copy of the completed Incident Reporting Form (and where applicable a copy of the incident investigation) to the relevant department / person
Environmental Manager / Plant Manager	Shall complete an Environmental Incident Report as per Appendix D to assess what level of incident occurred. Shall make recommendations for clean-up and / or appropriate alternate actions. Shall enter actions necessary to remediate environmental impacts into the database in conjunction with the responsible line manager. Shall enter the incident onto the database in order to monitor the root causes of incidents. Shall include the reported incidents in an appropriate monthly / quarterly report. Shall highlight all incidents for discussion at meetings

Dedicated telephones and radio frequencies are installed, and communication disciplines are to be adhered to at all times. The use of cell phones is recommended whenever possible.

6.2 Potential Risks and proposed Treatments

Internationally, it is recognised that monitoring and assessment are key requirements for effective control and management, including that of land-based effluent discharges to the coastal environment. The dischargers would therefore be responsible for the monitoring. Monitoring of possible impacts associated with the discharge of effluent into the coastal environment is an essential tool to determine the environmental impacts of the discharge and if the conditions as stipulated in the permit needs to be altered in any way. Regardless, besides monitoring, Table 6 identifies certain treatment methods or requirements to address potential incidents that may occur as a result of equipment failure, natural disasters, human error etc.

The recommended hierarchy for risk treatment (from highest to lowest) is shown below.

1. Eliminate the hazard. e.g. replace plant equipment;
2. Reduce the hazard. e.g. modify plant or equipment, install controls or alarms, build in redundancy or backup systems, engage the services of qualified contractors to manage the system;
3. Blocking the pathway. e.g. bunding, fencing, provide spill kits etc.
4. Administrative control. e.g. update or develop methods or procedures.

Eliminating the hazard is the most effective form of risk treatment, although at times this may require high capital investment. Utilising the other risk treatment options described above may therefore be the best alternative, particularly in the case of West Point Processors which is a pelagic fish processing

factory in St. Helena Bay. Furthermore, as indicated above, a preventative maintenance program, eg inspection frequency based on run-time hours, wastewater monitoring programs and training programs, can all assist with effective risk treatment.

Monitoring should include visual checks by the Engineering and Maintenance teams which primarily comprises of Dirk Heinlein (Cannery Workshop Superintendent) and Agnew De Nicker (Fishmeal Plant Workshop Superintendent) respectively on a daily basis, checks on particular requirements for site activities by the Jan-Taljaard Marx (SHE Manager)/Dudley Lesch (SHE Control Officer), as well as a review of site documentation. The SHE Manager shall complete the performance record at the end of each table above, as a record of transgressions or problems experienced on site, and how they were dealt with. Monitoring of activities on site by the SHE Manager should be done on a weekly basis.

Detailed Standard Operating Procedures (SOPs) for incidents listed in Table 6 below (Hazards 1-7) have been included in **Annexure E**. Hazard 8 is ongoing and is continually being addressed and dealt with by WPP. Please refer to Section 7 which addresses Hazard 8 in detail. Hazard 9 is dealt with in terms of the Emergency Preparedness Plan (**Annexure A**).

***TABLE 6**: POTENTIAL RISKS AND TREATMENT THEREOF.*

	RISK/ CAUSES:	TREATMENT:
Hazard 1	Power failures or Interruptions.	Provision of back-up diesel pump Provision of power generator
Hazard 2	Floods as a result of storms or natural disasters.	Installation of stormwater diversion systems.
Hazard 3	Accidental damage or rupturing of tanks or containers storing wastewater or similar substances by i.e. forklifts.	Appropriate Bunding.
Hazard 4	Failure of pumps, pipes, valves and fittings.	Installation of pressure gauge with electrical interlock system Provision of back-up pump (in case of pump failure).
Hazard 5	Accidental spillage or discharge of hazardous substances or materials during loading, unloading or handling.	<u>On site:</u> Provision of spill kits at appropriate locations within the Plant. <u>Into the effluent discharge stream:</u> Installation of in-line pH or dissolved oxygen probes in wastewater system for detection.
Hazard 6	Vandalism.	Installation of security and control devices (eg video surveillance, locking mechanisms etc.)
Hazard 7	Accidental discharge of diesel, petrol, hydraulic liquid due to human or system errors, equipment damage, breakdown or faults.	Availability of oil spill kits at appropriate locations. Availability of emergency telephone numbers at appropriate locations in the form of signage (Appendix B)
Hazard 8	Poor wastewater quality discharged to sea.	It is proposed that WPP concentrate on one "problem parameter" namely FOG which can directly or indirectly have an effect on the other parameters. The use of degradative additives is not the sole

		solution for FOG management and multiple approaches should be implemented. For example, a GTS can be used with GREASOLUX (or similar product) to stimulate the microbial communities and an automated skimming process within or part of the GTS can remove the excess FOG. It is advised that diligent consideration should be taken in the selection of a FOG reduction system to ensure that it can be employed for several years. If a GTS solution is considered, a maintenance plan is crucial, as the consequences of a malfunctioning GTS can be detrimental to the receiving environment and negatively influence the WPP process line. Additional undertakings that will benefit WPP in future is the installation of a reverse osmosis system and the expansion of the processing plant with an aquaculture initiative. Except for an opportunity to manage and utilise the effluent, an aquaculture plant adjacent to the existing WPP infrastructure has potential financial benefits. It is proposed that the aquaculture facility make use of the latest technology, namely an indoor Recirculating Aquaculture System (RAS). Refer to **Section 7 Improvement of The Coastal Water Discharge Quality** (page 17-25) below.
Hazard 9	Emergency Evacuation: i.e. Bomb threat, Civil Unrest or Fire.	Please refer to the Emergency Preparedness Plan (**Appendix A**) for Emergency procedures in terms of an Evacuation.

7. IMPROVEMENT OF THE COASTAL WATER DISCHARGE QUALITY

The most significant environmental impact currently facing the WPP is the inability to adhere to the CWDP limits and therefore releasing effluent into the ocean that is polluting the ocean and its environment.

The most recent CWDP issued to WPP in terms of Section 69 of the Integrated Coastal Management Act was in June 2017. Some of the parameters required in the CWDP of WPP at times exceeds the maximum of the prescribed limits. An independent study[1] was undertaken and is aimed at addressing the parameters whose average readings surpass the set limits for prolonged periods. The permit regulations for the receiving environment is not addressed directly but mitigating measures introduced at the plant will have a direct influence on the quality of these waters.

Generally speaking, the "problem parameter" that frequently exceeds the set limit is turbidity (83% of the time). Fats, oils, greases (FOG) and total suspended solids (TSS), probably cause this phenomenon. The BOD is also frequently above the given limit due to the FOG, as more oxygen will

[1] Jan Taljaard Marx & Jan-Taljaard Marx. *Management Plan for Improvement of the Coastal Water Discharge Quality of West Point Processors, St Helena Bay*. September 2020.

be required to be consumed by aerobic bacteria as there is more organic material in the effluent. If the BOD remains above the set limit, it can possibly lead to anaerobic conditions. In sheltered areas, where there is limited water flushing, this will be especially the case due to the accumulation of organic waste. This in turn can lead to hypoxia (reduced oxygen) that has secondary negative impacts on the marine environment such as changes in the composition of benthic communities.

In an effort to continually improve environmental performance at WPP a number of potential mitigation measures or recommendations are being investigated. The proposal for membrane technology was researched as an option to be introduced as an opportunity for improvement. West Point Processors have also looked into the viability of extending the effluent pipeline further into the sea.

7.1 Parameters

7.1.1 Turbidity

There is a range of basic treatment options available but the most effective means for reducing turbidity is through filtration. It involves the extensive use of rotating drum filters to sift out and remove particulate matter. The particulate material should then be fed back into the fishmeal plant. If the FOG concentrations in the effluent can be diminished, it should have a direct positive effect on the turbidity.

7.1.2 Fats, Oil and Grease

a) Mechanical solutions

Grease trap waste (GTW), often referred to as brown grease, is a complex mixture consisting of residual fat, wastewater and suspended solids and is most likely the composition of the waste generated at WPP. There are two types of grease trap systems (GTSs) namely passive grease traps and grease recovery units (GRUs) that can be employed to contain GTW.

Passive GTS: The separation system of this kind of traps is based on gravitational force. The emptying of these grease traps includes removing all contents of the unit including the lipid rich layer, the wastewater and the solids waste layer.

GRU-GTS: These are units which are smaller in size and is emptied by daily removal of the lipid rich layer by skimming and at times heating the lipid-rich FOG layer and deposit it into a separate container. This lipid-rich FOG layer is similar to used cooking oil (UCO) and has fewer impurities than the end products of passive GTSs.

Other FOG removal methods include a filtration process, such as a hydro-chemical grease interceptor (Figure 2). Although there are numerous other systems, which are much more complex, this seems to be the easiest and cheapest solution. A hydro-chemical grease interceptor is a plumbing appliance that is installed in a sanitary drainage system to intercept non-petroleum FOG from a wastewater discharge. A specific model to be installed is identified by flow rate and separation/retention efficiency. The design comprises air entrainment (to increase the oxygen concentration for microbes), hydro mechanical separation, interior baffling, and/or barriers in combination or separately, and one of the following:

A. External flow control, with air intake vent, directly connected
B. External flow control, without air intake vent, directly connected
C. Without external flow control, directly connected
D. Without external flow control, indirectly connected

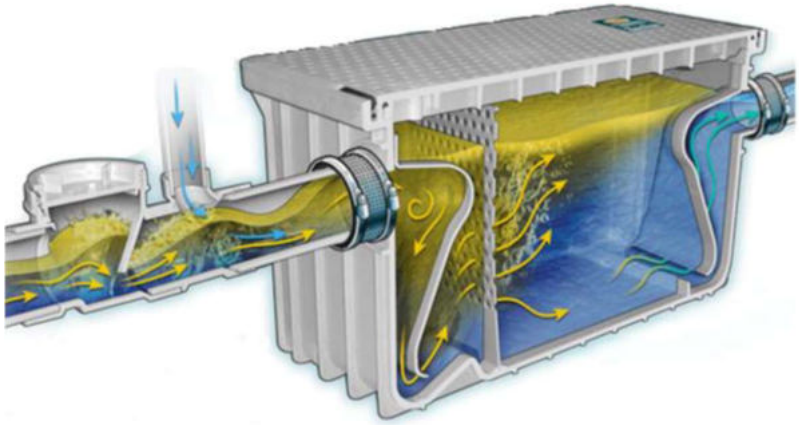


Figure 2. *An example of a hydro-chemical grease interceptor.*

The hydro-chemical grease interceptor can be placed outside of the WPP plant, within Pipeline A and B, before the effluent reaches the receiving environment. The hydro-chemical grease interceptor design allows it to be imbedded in the ground. This will prevent visual pollution and not take up unnecessary space. The captured FOG from the grease interceptor system will have to be removed, either manually, or by using an automated skimming system, adding chemicals or by using microbial communities.

b) Biological control

The use of microbial additives for reducing FOG deposits is frequently debated, however, studies have shown that some GTSs are unable to efficiently retain dissolved and emulsified fats, which necessitates the implementation of additional measures. To improve the efficiency of a GTS, it can be combined with biological control, such as the use of activated sludge. Activated sludge is aerated effluent containing aerobic microorganisms that has been stimulated or their natural process has been catalysed to improve their rate of FOG breakdown. It is important to note that the microbial community required to reduce the FOG is mostly likely already present in the effluent. The microbial community therefore only requires adequate time and oxygen to fulfil their natural goal. To guarantee the effectiveness of this process, anaerobic conditions in the effluent should be avoided. The installation of a GTS can provide the necessary space, time and oxygen for the microbial community to perform its function. Once the system is operational, the microbial community should be monitored to ensure that it is functioning optimally. In cases of high fish production, a lipase culture can be added to assist with the removal of FOG. Lipase is a natural product that can increase the fat breakdown process. If necessary, additional oxygen should be added to the effluent to prevent anaerobic conditions.

Bacteria associated with wastewater preferentially degrade unsaturated fatty acids producing semi-solid, sticky material that has the potential to block pipelines. If multispecies microbial inoculates are

introduced into the system it can degrade significant amounts of a variety of fats and oils without significantly modifying the fatty acid composition, which will help keep effluent pipelines free of grease deposits. Some multi microbial species supplements are capable of significantly enhancing the degradation of several fats and oils by 37 - 62%. It is however known that some municipal authorities have an issue with microbial additives in that it may degrade the FOG to coagulate further down the line. The addition of multi microbial species can also introduce invasive species into the natural microbial community, which can have unforeseen consequences. For the biological control to be successful, a better understanding of the present microbial community in the effluent should be obtained. This will also assist in the decision making for the implementation of a multi microbial species approach. It must however be kept in mind that the use of biological control will still require grease trap maintenance.

c) Control through additives

The addition of various chemicals can also reduce FOG, but this is not ideal, as the chemicals are unnatural and can have detrimental influences on the receiving environment if incompatible chemical dosages are introduced.

Fat and oil removal by acidification, alum and dissolved air flotation (DAF) is approximately 85% to 95% effective and it has been found that the use of alum and ferric chloride coagulants remove more than 90 % of these substances. Using sulphuric acid or hydrochloric acid at pH 3 with a retention time of 1 day, approximately 80 % of the fat and oil can be removed. Applying ferric chloride with a cationic polymer, efficiencies of more than 97 % for fat and oil removal can be achieved. Additional methods that can be experimented with is the use of different absorbents, such as clay minerals for the removal of fat and oil or the use of ionising rays such as gamma which is effective in decreasing oil, lubricants, and grease concentrations. The utilisation of gamma rays for FOG removal is still uncommon and not implemented frequently.

FOG can also be reduced by using a bio-friendly product such as GREASOLUX that provides solutions to the problems caused by FOG in wastewater treatment. It is an effective way to remove grease and fats from pipelines, grease traps, pumping stations and wastewater treatment plants.

GREASOLUX cartridges are cylindrical in shape and are filled with microorganisms and fermenters that break down and dissolve the FOG. The product is not harmful to pipelines, pumps and other mechanical equipment and is friendly towards biological wastewater treatment plants. GREASOLUX cartridges contain especially powerful fat dissolving microorganisms and enzymes. As the cartridges slowly dissolve, microorganisms spread through the wastewater system and consolidate on various surfaces where they initiate the growth of large bacterial colonies. These colonies are then able to dissolve large amounts of fat efficiently.

d) Combination control

The best results for FOG removal will be to use a combination of methods such as a mechanical system combined with a biological or chemical control method. A plant that incorporates a combination of these methods is the Shiraz Municipal Wastewater Treatment Plant (MWWTP). This procedure of this plant is an example of how various catchment areas can be utilised to mitigate FOG in the effluent

(Figure 3). The Shiraz MWWTP incorporates an activated sludge process to stimulate the microbial communities present in the effluent.

The activated sludge procedure is mainly used for the purpose of FOG removal and not for nitrification or denitrification processes. It consists of the following units: 1) screening, 2) grit removal chamber with skimmer, 3) primary sedimentation tank, 4) aeration tank, 5) secondary sedimentation tank and 6) chlorination unit (Figure 3).

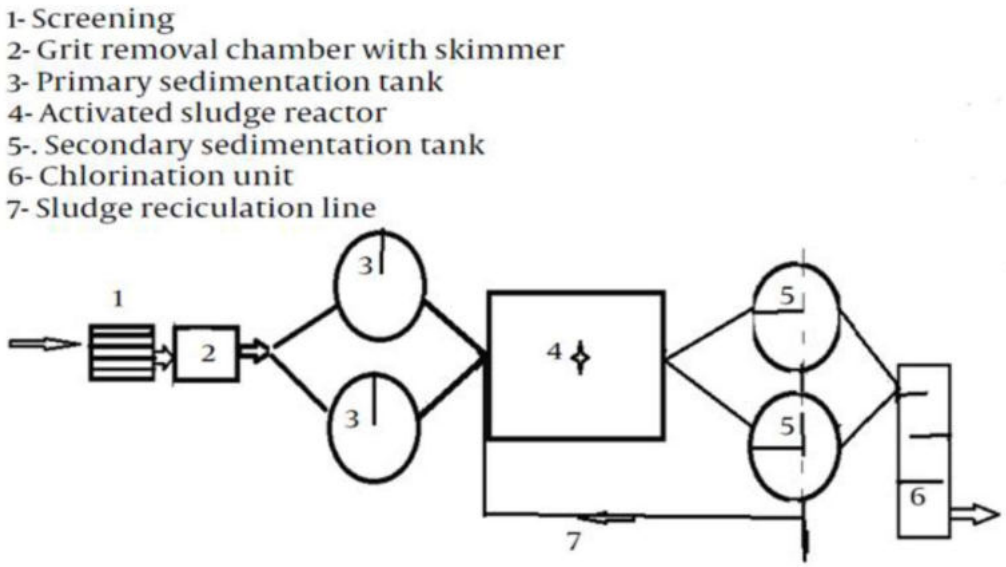


Figure 3. *A simple flow diagram of the Shiraz Municipal Wastewater Treatment Plant using an activated sludge process.*

Another alternative is to combine GREASOLUX with a GTS (Figure 4) that is placed on the outside of the WPP plant in pipeline A and B before the effluent reaches the receiving environment.
Once again, the GTS will provide the space and time for the added microorganisms to dissolve the FOG. The GTS can also be operated without any additives and aerated on a regular basis but the success could be limited and will require additional physical removal of FOG.

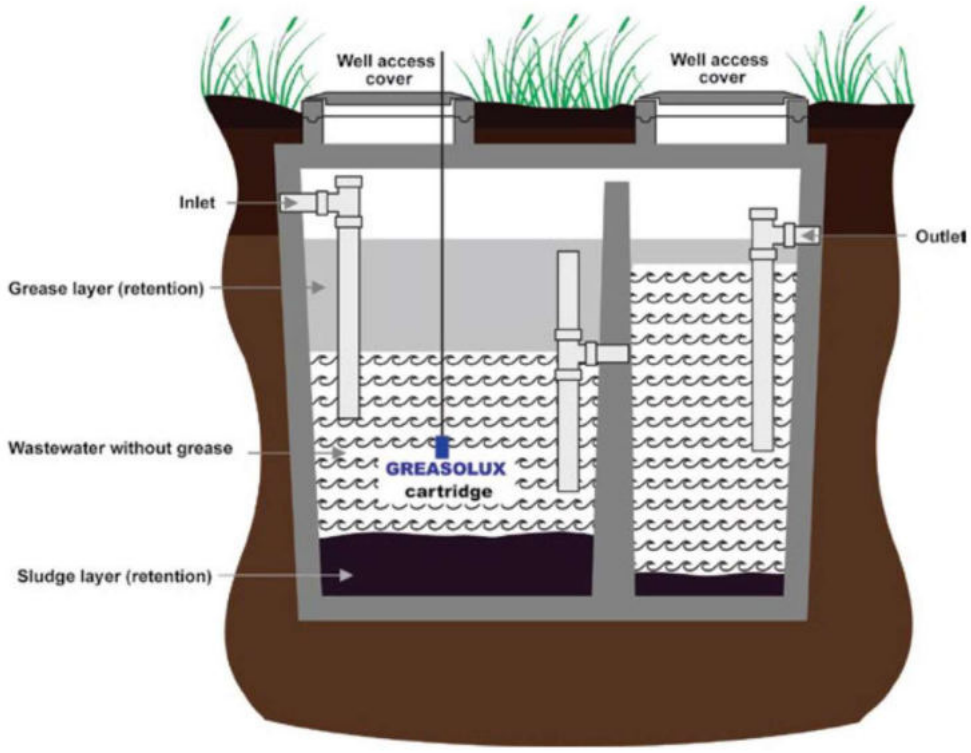


Figure 4. *An abstract representation of the inclusion of GREASOLUX with a GTS.*

The conclusive result appears to be that the use of degradative additives is not the sole solution for FOG management and that ideally multiple approaches should be implemented. For example, a GTS can be used with GREASOLUX (or similar product) to stimulate the microbial communities and an automated skimming process can remove the excess FOG. By effectively reducing the FOG numerous other parameters will simultaneously be mitigated. It is advised that diligent consideration should be taken in the selection of a FOG reduction system to ensure that it can be implemented for numerous years. If a GTS solution is considered, a maintenance plan is crucial, as the consequences of a malfunctioning GTS can be detrimental to the receiving environment and negatively influence the WPP process line.

7.1.3 Total Suspended Solids

The most effective means for reducing suspended solids is through filtration and reducing the FOG contents of the effluent, as it has been determined that the FOG has a significant effect on the TSS. Thus, reducing the FOG will diminish the TSS of the effluent.

Additional measures can be implemented if the problem persists such as the use of rotating drum filters to filter out and remove particulate matter. This method has been applied in the aquaculture industry extensively. The particulate material is then fed back into the fishmeal plant. Other options are to add ozone, activated sludge or charcoal which are more expensive.

7.1.4 Biochemical Oxygen Demand

Once again, a highly significant correlation between FOG and BOD was found, therefore reducing the FOG content will in theory drastically diminish the BOD of the effluent.

BOD is easy to resolve in the effluent by providing a supply of oxygen during the treatment process. The oxygen supports bacterial growth that breaks down the organic BOD. More enhanced treatment units incorporate a substance, which actively oxygenates the sewage to reduce BOD. The use of bio filters and sand filters has also been used to resolve issues regarding BOD. Another option is to add hydrogen peroxide as it contains an additional oxygen molecule; however, the addition of an unnatural chemical to treat another anomaly is not ideal If the FOG is reduced there will be less organic material that needs to be broken down, thus the demand for oxygen will be less and will be consumed at a more sustainable rate by the microbial communities. In conclusion, the addition of a GTS with a biological control or additive will reduce the FOG and subsequently the BOD and will most likely be the more sustainable and long-term solution.

7.1.5 Ammonia

Ammonia is a major metabolic waste product from fish. It is excreted across the gill membranes and in the urine and is the most likely source of ammonia in the effluent. The simplest way to reduce ammonia is to aerate the effluent but this is not very effective for ammonia treatment as a whole. However, the introduction of additional oxygen into the effluent to reduce ammonia will assist in the mitigation of FOG and BOD. The other way is through biological filtration, which is used extensively by the aquaculture industry, especially finfish farming, where they recirculate 95% of the water. Another alternative is to pass the effluent through a filter medium (comprising out of particulate material with a high surface area covered with bacteria) where the ammonia can be converted to nitrate and/or nitrite.

7.1.6 Biological Removal of Ammonia

a) Conventional Nitrification / Denitrification

Conventional nitrification and denitrification are commonly used biological methods of ammonia nitrogen removal from municipal wastewater. This method can also be used to treat industrial wastewaters, but at higher ammonium concentrations.

Nitrification occurs in two steps each performed by two distinct genera of microorganisms. The first step is the biological oxidation of ammonia to nitrite. Oxidation of nitrite is carried out by ammonia-oxidising archaea (AOA) (Hatzenpichler 2012) and ammonia-oxidising bacteria (AOB) (e.g. Nitrosomonas). The process is aerobic and consumes alkalinity as the carbon source. The second step of nitrification is heterotrophic oxidation of nitrite to nitrate by nitrite oxidising bacteria (NOB), e.g. Nitrobacter and Nitrospira. Oxidation of nitrite also requires oxygen but does not consume alkalinity. However, all nitrifying microbes are chemoautotrophs thus using carbon dioxide/alkalinity as their carbon source and in addition uptake the ammonia as the nitrogen source for cellular synthesis.

Denitrification is carried out by heterotrophic facultative anaerobic bacteria. Denitrification occurs in the absence of free oxygen, it requires an electron donor (e.g. organic carbon such as methanol, acetate, etc.), and consumes acid resulting in increased alkalinity.

Nitrification can either be executed as a suspended growth- or attached growth process. Suspended growth reactors include complete mix, plug flow and sequencing batch reactors. Attached growth processes can be a trickling filter or a rotating bio-contactor. Configurations for denitrification include

an anoxic zone within the treatment train or a sequencing batch reactor where aeration is intermittent. Depending on operating parameters, a wide range of treatment options is available, depending on how much nitrification and denitrification are required for the particular application. Typical parameters for all of these processes are well documented in design literature.

b) Removal of Ammonia by Algae

When using algae for ammonia removal, nitrogen is primarily converted into biomass through cellular synthesis of fast-growing photosynthetic microorganisms. Use of algae in ammonia removal has a threefold benefit e.g. removal of inorganic nitrogen, sequestration of CO2, and production of potentially valuable biomass for animal feed or biodiesel production.

c) Electrochemical Removal of Ammonia

Electrochemical oxidation of ammonia (ECOA) is induced by passing an electric current through an aqueous solution containing ammonia. This process is more generally referred to as electrolysis. The overall effectiveness of ECOA depends on many key factors such as electrode composition, current density, halogen ion concentration, and pH These factors combined determine if oxidation will occur and to what degree it will transpire (i.e. oxidation to nitrogen gas, nitrite or nitrate).

d) General Ammonia Removal

The options are to either add ozone, activated sludge, charcoal, microwave radiation or steam stripping. For ammonia content frequently higher than 100mg/l, it may be more economical to use alternate ammonia removal techniques, such as steam stripping or biological methods. Air stripping may also be used to remove many hydrophobic organic molecules.

7.2 General

7.2.1 Sampling procedure

Be constant with sampling time, locality, and day as far as possible. The samples should be collected by the same person to avoid human based errors. Determine what the cause of the gaps in data is. Is it due to lack of data, sampling not executed or was the concentrations too low to detect? Standardise a time for sampling that is fixed and the method that data is reported. Sampling should also be done on days when the plant is not operational. The readings obtained from the days of non-production can serve as control for days of production.

Once new systems are installed at the plant it is suggested that three pseudo/biological replicates from the effluent should be collected at different times to test for the effectivity of the methods implemented.

7.2.2 Reverse osmosis

Reverse osmosis systems are cost effective and ensure recyclable water is efficiently provided by removing all dissolved solids. Some fishing industries along the West Coast such as Sea Harvest, Lucky Star and Amawandle Pelagic have already installed Reverse Osmosis Plants to supply the factories with fresh processing water. Desalination (Sea Water) membranes are available that can treat water with

a Total Dissolved Solids reading of up to 38 000 mg/l. This potential scheme can be investigated for WPP in future.

7.2.3 Aquaculture

A futuristic potential development that might provide a long-term solution to the effluent discharge challenge is to initiate an aquaculture initiative. Except for an opportunity to manage and utilise the effluent simultaneously and address high concentrations of FOG and ammonia such a project will provide financial benefits.

It is proposed that the aquaculture facility make use of the latest technology for finfish culture, namely an indoor Recirculating Aquaculture System (RAS) for the primary production of salt-water finfish species, such as Atlantic Salmon and Sea Trout. This intensive, indoor, tank-based RAS achieves high rates of water re-use because of mechanical, biological and chemical filtration and other treatment steps. Through this process, large volumes of the effluent that is presently discarded into the ocean can be re-used to provide food for spin-off aqua cultural products.

Once the production of finfish has been established, the RAS can be combined with an Integrated Multi-trophic Aquaculture System (IMTAS). Instead of using a single species (such as finfish) in cultivation, and focusing efforts on its needs alone, the IMTAS approach imitates a natural ecosystem. It combines the cultivation of several species such as oysters, clams, seaweed, etc., which have complementary ecosystem functions and trophic levels. Any food, nutrients, by-products and waste generated by one trophic level, can be reused, converted into nutrients, food, and energy by the next trophic level. In this way, some of the food from the RAS, such as nutrients and by-products considered "lost" from the fed component of the farm (namely the finfish), are recaptured and converted into harvestable and healthy seafood (oysters, clams and seaweed of commercial value). This also promotes bio-mitigation of the effluent water (partial removal of nutrients and CO2 and supplying of oxygen). Hence, increasing the overall sustainability, profitability and resilience of the aquaculture farm and fish factory.

The development of the aquaculture complex should be investigated as a new venture to establish long term solutions for the coastal water discharge of WPP. The long-term impact of the land-based infrastructure and species to be farmed with will have to be thoroughly and scientifically assessed through an Environmental Impact Assessment process.

7.3 Summary of Findings

The graphic displays and analysis of the available data indicated that the "problem parameters" that need to be addressed are Turbidity; Fats, Oil and Grease; Total Suspended Solids; Biochemical Oxygen Demand and Ammonia. Generally speaking, the "problem parameter" that most frequently exceeds the set limit is turbidity (83% of the time. Fats, oils, greases (FOG) and total suspended solids (TSS), probably cause this phenomenon. The BOD is also regularly above the given limit due to the FOG, as more oxygen will be required for consumption by aerobic bacteria due to the presence of more organic material in the effluent.

It is proposed that WPP concentrate on one "problem parameter" namely FOG which can directly or indirectly influence the other parameters. The use of degradative additives is not the sole solution for FOG management and multiple approaches should be implemented. For example, a GTS can be used with GREASOLUX (or similar product) to stimulate the microbial communities and an automated

skimming process within or part of the GTS can remove the excess FOG. It is advised that diligent consideration should be taken in the selection of a FOG reduction system to ensure that it can be employed for several years. If a GTS solution is considered, a maintenance plan is crucial, as the consequences of a malfunctioning GTS can be detrimental to the receiving environment and negatively influence the WPP process line.

Additional undertakings that will benefit WPP in future is the installation of a reverse osmosis system and the expansion of the processing plant with an aquaculture initiative. Except for an opportunity to manage and utilise the effluent, an aquaculture plant adjacent to the existing WPP infrastructure has potential financial benefits. It is proposed that the aquaculture facility make use of the latest technology, namely an indoor Recirculating Aquaculture System (RAS).

8. TRAINING, EXERCISING AND DRILLS

For the Contingency Plan implementation to be effective, appropriate training will need to be provided to both permanent and contractual staff on the actions to be undertaken in the event of an incident. Once an incident has occurred, appropriate risk treatment will need to be incorporated in the CP to prevent similar incidents occurring in future.

8.1 Reviews and updates

The Contingency Plan is to be reviewed and updated as follows:

- Regularly (at nominated intervals preferably at least annually)
- In response to any alterations to processes and infrastructure that may result in increased risk of environmental harm
- In response to issues identified from process monitoring, testing or audits
- In response to environmental incidents or serious complaints.

8.2 Induction and Training

Before implementing the CP, the SHE manager shall designate and train a enough persons to assist in the implementation of the CP. The CP must be reviewed with all employees at the following times:

- Initially when the plan is developed;
- Whenever the employee's responsibilities or designated action under the plan or whenever the plan itself is changed;
- At least annually employee meetings are to be held to train employees of the contents of the CP and revise the plan as appropriate;
- Drills will be conducted, and full participation encouraged; and
- All training must be documented in writing and copies sent to SHE Officer.

All full-time staff and contractors are required to attend an induction session. Key Employees will be inducted when they start and when they return from long leave. Any contractor, who works on the plant for a period of 24 hours or more, is required to undergo the respective induction training. Environmental issues and aspects related to the operation will be addressed in induction sessions.
All environmental impacts, aspects and their mitigating measures will be discussed, explained and communicated to employees. The induction sessions will be modified according to the level of employee attending the induction session, so that all employees gain a suitable understanding of the environment, pollution and what to do when an incident occurs.

The basic content of the induction programme for key full-time employees is as follows:

1. Welcome and Registration	8. West Point Processors Environmental Policy
2. Security Roles and Responsibilities	9. WPP PPE Policy
3. WPP Health & Safety Policy	10. PPE Application in the Workplace
4. Evacuation Plan, Procedures and Emergency Plan	11. Sustainability Contributions as WPP
5. Injury or Damage Reporting Procedure	12. Water and Waste Management

6. Incident Notification and Reporting	13. Potential Hazards, Causes, Impacts and Immediate Treatments
7. Hazards on Site and Precautionary Measures	

A Basic Environmental Training Course should be developed by management. Further training can be undertaken through:

Environmental Meetings

Environmental meetings can be held with management, and selected groups of supervisors /foremen and/or employee representatives. This will take the form of an open discussion between the relevant department and these individuals. The symposiums will aid in environmental awareness being generated at all levels, as well as assist the relevant departments in defining all, and identifying new environmental issues, concerns and pollution sources.

In-house Training

In-house training sessions can be held with relevant employees. The training sessions can be determined by the relevant department and will allow for employees to participate in determining what the environmental issues and concerns are with regard to their specific occupation. Education regarding environmental incident reporting can be detailed at these sessions.

On the Job Training and Drills

On the job training is an essential tool in environmental awareness. Employees will be given details of the expected environmental issues and concerns specifically related to their occupation. Employees will be trained on how to respond if an environmental problem or source of environmental pollution arises. The training will be on-going, and all new employees will be provided with the same standard of training as existing employees. Basic environmental and pollution control skills will be included in this training.

9. TERMINATION OF CLEAN-UP OPERATION

The decision to terminate the clean-up operation lies with the SHE Manager and depends on the scale of the incident. Termination of the clean-up operation for Tier II incidents must be undertaken in close consultation with DEA/ Local Municipality and based on their assessment of the situation a decision will be made.

Particular attention should be given to:

- Standing down and cleaning-up equipment in readiness for future incidents.
- Re-ordering consumed materials.
- Preparing a detailed report on the operation.
- Reviewing the contingency plan.

APPENDIX A: EMERGENCY PREPARDENSS PLAN

Emergency Response Plan Summary				
Document #: 02.19.24.02.01	Procedures and Policies			WEST POINT PROCESSORS (PTY) LTD.
Rev: 1	Effective Date: August 2024	Reviewed: August 2025	Need Revision: January 2026	Factory: P. O. Box 15 – St Helena Bay 7390 –Tel. (022) 736 1100 – Fax. (022) 736 1282
Approved by: OHSE Manager	Jan-Taljaard Marx		Signed	

Please Familiarise Yourself With The Emergency Evacuation Drill And Important Contact Numbers

The following applies to all workplace emergencies requiring evacuation:

- One long or three short alarm(s) will sound to activate an emergency evacuation.
- All staff then calmly evacuate using designated escape routes to the assembly area.
- Appointed staff, such as Evac Wardens, Fire Fighters, First Aiders, and HOD's, to ensure all staff are evacuated from their workstations.
- Once at the assembly area, on the grass porch at the front gate, divide into your departmental sections as indicated on the sidewalk.
- A roll-call process will start, notify your Evac Warden once your name is read.
- Immediately notify an Evac Warden of missing or unaccounted Staff.
- Do not get in the way of emergency staff.
- Await orders to disperse, return to the building, or take additional measures.

EMERGENCY CONTACT NUMBERS	
Fire Coordinator (H & S Officer) – Denvor Onverwacht	064 850 4009
OHSE Manager – Jan-Taljaard Marx	067 592 6785
Site Engineer (GMR 2) – Craig Gallant	066 162 2331
Environmental Control Officer - Dudley Lesch	079 1555 331
General Manager – Marthin Potgieter	082 551 0217
HR, Services & Site Manager– Johan Witbooi	082 040 8333
Site Clinic – Sr. N. Erasmus	079 605 4425
Security Management (JC Group)	073 339 0772 **/** 074 529 2016
Emergency Control Room	010 006 2300
Police – St. Helena Bay	022 736 8060 (Short Code:5571)
Fire Department – Vredenburg Call Centre	022 701 7061 **/** 022 701 6974 **/** 022 701 3256
West Coast Private Hospital	022 719 1030 (Short Code: 5673 **/** 5111)
Vredenburg Public Hospital	022 709 7200 (Short Code: 5673 **/** 5121)
Ambulance Service	10177
West Coast Medical Rescue Ambulance	081 829 3355
National Sea Rescue Institute (NSRI)	082 990 5966
West Coast Snake Handlers - Hendrik	079 154 6518
Xander Snake Catcher	060 710 4177

ANNEXURE B: EQUIPMENT STOCK LIST

QUANTITY	PURCHASE/ REPLACEMENT DATE	ITEM	LOCATION
25	Next Service date:	Fire Extinguisher	Cannery / Labelling
7	Next Service date:	Fire Hoses	Cannery / Labelling
4	Review Weekly	First Aid Boxes	Cannery / Labelling
3	Next Service date:	Fire Extinguishers	Habour - Kaai
16	Next Service date:	Fire Extinguishers	Boiler/Stick water plant
5	Next Service date:	Fire Extinguishers	Workshops
3	Review Weekly	First Aid Boxes	Workshop
7	Next Service date:	Fire extinguishers	Fish meal plant
4	Next Service date:	Fire extinguishers	Clinic & Security
1	Review Weekly	First Aid Boxes	Clinic & Security
	Review Weekly	Personal Protective Clothing/Equipment	OHS Office
	Review Weekly	Spill Kits	
	Next Service date:	Back-up pump / Generator	

APPENDIX C: EMERGENCY CONTACTS LIST

EMERGENCY SERVICES	
SERVICES / PERSON	**TELEPHONE NO.**
West Point Switch board	9
J Witbooi	022 736 1100 [Ext. 235] Cell: 082 040 8333
S Kroucamp	022 736 1100 [207] Cell: 083 460 3931
Sr. N. Erasmus	Cell: 079 605 4425
Fire Station	022 703 6100
Police	022 736 8060
Ambulance	101 77
Electricity	022 713 1153 (a/h 080 121 2455)
Water	022 736 1056 (a/h 022 701 7061)
Hospital	022 709 7200 0r 022 719 1030
Company Doctor	022 714 2380 – 5293

APPENDIX D: ENVIRONMENTAL INCIDENT REPORT

Date & Time Occurred:	
Personnel Involved:	
Where the incident happened:	
How and why the incident happened:	
How rehabilitation or clean up needs to take place:	
The nature of the impact that occurred:	
The type of work, process or equipment involved:	
Recommendations to avoid future such incidents and/or occurrences:	
GENERAL COMMENTS:	
DECLARATION: I certify that the above is an accurate account of what occurred. Supervisor Name: Date: Signature:	

APPENDIX E: HAZARD SOPs

HAZARD 1:	
CAUSE	Power failures or Interruptions.
EFFECT	Power disruptions to pumps transferring wastewater. Overflow of wastewater resulting in surface water pollution. Lack of oxygen supply or slowdown in production could result in anaerobic conditions leading to odour generation.
LIKELIHOOD	More than once a year.
CONSEQUENCE	Tier 2—environmental nuisance or material harm depending on the amount of hydrocarbon lost and the receiving environment
RISK TREATMENT	• Provision of back-up diesel pump • Provision of power generator

ACTIONS REQUIRED

The following actions shall be performed and ticked off as completed:

1. IMMEDIATE CORRECTIVE ACTIONS	
• Process operator to immediately switch to generator - if not automated.	☐
• Should any spillage result from the break in power – the SOP for Hazard 5 must be implemented.	☐

2. ACTIONS TO MINIMISE IMPACTS	
• Ensure a back-up diesel pump and power generator is kept on the premises.	☐

HAZARD 2:	
CAUSE	Floods as a result of storms or natural disasters.
EFFECT	Inundation of wastewater storage, treatment and disposal system by floodwaters resulting in the pollution of surface water.
LIKELIHOOD	Once a year or less.
CONSEQUENCE	Tier 2—environmental nuisance or material harm depending on the amount of hydrocarbon lost and the receiving environment
RISK TREATMENT	Installation of stormwater diversion systems.

ACTIONS REQUIRED

The following actions shall be performed and ticked off as completed:

1. IMMEDIATE CORRECTIVE ACTIONS	
• Process operator shall contact the plant supervisor and plant manager to report the incident.	☐
• Process operator to immediately contain the incident and stop the source of spillage. Use loose soil and sand on the site to contain and absorb the spill. Implement clean up using the spill kits provided located: - Dispatch - Label Store - Boiler House - Generator Room - Jetty - Cannery Chemical Store - Bulk Store - FMP Workshop	☐
• Plant Maintenance Superintendents shall notify users whose supply will be cut off (this may be done first depending upon the severity of the break) requesting them to shut down valves to their system(s) namely – o Marthin Potgieter – 082 551 0217 o Johan Witbooi – 082 040 8333 o Stean Kroucamp - 083 460 3931 o Dennis Griffiths – 082 040 8883 o Brian Afrika – 072 011 1161 o Diavre George – 072 011 1722	☐
• Depending on the type of spill it needs to be determined if a specialist contractor (Spill Tech - 0832536618) is required for clean-up. If no specialist contractors are required (as confirmed by SHE Manager) then clean-up is to commence immediately.	☐
• Plant supervisor shall contact (Craig Gallant (Site Engineer – 0661622331)) to arrange any necessary repairs to the applicable facility.	☐

2. ACTIONS TO MINIMISE IMPACTS	
• If the incident occurs within the Plant boundary, the plant supervisor or designated deputy shall contain the spill wherever practicable, to prevent runoff into water resources and/or the stormwater drainage system. These actions should not compromise other health, environmental or safety considerations. Infiltration of the	☐

spill into vegetated/ grassed areas should be maximised in preference to allowing runoff to the stormwater drainage network.	
• If the incident occurs outside the Plant boundary, the plant supervisor or designated deputy shall instruct (Spill Tech - 0832536618) to arrange containment and clean-up of the spill (wherever practicable).	☐
• Disposal of spill and clean-up material must be undertaken at a Licence Landfill Site and must be removed by a registered waste removal company (EnviroServ - 0800192783).	☐
• Address course of spillage to avoid future issues.	

3. NOTIFICATION/REPORTING *Refer to Section 5 of the CP for relevant contact details and Annexure C for Emergency Contacts.* *The plant manager, or designated deputy shall:*	
• Contact persons as per the CP and Environmental Incident Reporting procedure.	☐
• Complete and circulate Environmental Incident Report (Appendix D).	☐

3. RECORDS *Document evidence that the plan was auctioned correctly:*	
• Completed Environmental Incident Report (Annexure D).	☐
• Completed SOPs Checklist.	☐

HAZARD 3:	
CAUSE	Accidental damage or rupturing of tanks or containers storing wastewater or similar substances by i.e. forklifts.
EFFECT	Escape or spillage of products to surface water resulting in pollution of surface or groundwater.
LIKELIHOOD	Once a year or more often
CONSEQUENCE	Tier 2—environmental nuisance or material harm depending on the amount of hydrocarbon lost and the receiving environment
RISK TREATMENT	Appropriate bunding and installation of grease traps.

ACTIONS REQUIRED

The following actions shall be performed and ticked off as completed:

1. IMMEDIATE CORRECTIVE ACTIONS	
• Process operator shall contact the plant supervisor and plant manager to report the incident.	☐
• Should any spillage escape the bunded area or areas without collection 'grease trap' points – the SOP for Hazard 5 must be implemented.	☐

2. ACTIONS TO MINIMISE IMPACTS

• Appropriate bunding within identified areas needs to be installed and well maintained for cracks/ damage. Where drainage channels and grease traps have been installed the correct 'fall' needs to be ensured. A sign alerting employee to keep the storage of equipment/tanks beyond this point would be required. The line can be determined by the fall of the specific zone towards the drainage channel and grease trap. If run-off bypasses the channel leading into the grease trap this would be the determination of the "no-go zone".	☐

HAZARD 4:	
CAUSE	Failure of pumps, pipes, valves and fittings.
EFFECT	Escape or spillage of product (or wastewater) to surface water. Pollution of surface waters.
LIKELIHOOD	Once a year or more often
CONSEQUENCE	Tier 2—environmental nuisance or material harm depending on the amount of hydrocarbon lost and the receiving environment
RISK TREATMENT	• Installation of pressure gauge with electrical interlock system • Provision of back-up pump (in case of pump failure).

ACTIONS REQUIRED

The following actions shall be performed and ticked off as completed:

1. IMMEDIATE CORRECTIVE ACTIONS	
• Process operator shall contact the plant supervisor and plant manager to report the incident.	☐
• Should any spillage escape the bunded area or areas without collection 'grease trap' points – the SOP for Hazard 5 must be implemented.	☐
• Plant supervisor shall contact (Craig Gallant (Site Engineer – 0661622331)) to arrange any necessary repairs to the applicable facility.	☐

2. ACTIONS TO MINIMISE IMPACTS	
• Installation of pressure gauge with electrical interlock system • Provision of back-up pump on site (in case of pump failure).	☐

HAZARD 5:	
CAUSE	Accidental spillage or discharge of hazardous substances or materials during loading, unloading or handling.
EFFECT	Escape of hazardous substance to storm water drains. Pollution of surface waters. Release of toxic materials to coastal water discharge outlets resulting in pollution.
LIKELIHOOD	Once a year or less.
CONSEQUENCE	Tier 2—environmental nuisance or material harm depending on the amount of hydrocarbon lost and the receiving environment

RISK TREATMENT	On site: Provision of spill kits at appropriate locations within the Plant. Into the effluent discharge stream: Installation of in-line pH or dissolved oxygen probes in wastewater system for detection.

ACTIONS REQUIRED

The following actions shall be performed and ticked off as completed:

1. IMMEDIATE CORRECTIVE ACTIONS	
• Process operator shall contact the plant supervisor and plant manager to report the incident.	☐
• Process operator to immediately contain the incident and stop the source of spillage. Use loose soil and sand on the site to contain and absorb the spill. Implement clean up using the spill kits provided located: - Dispatch - Label Store - Boiler House - Generator Room - Jetty - Cannery Chemical Store - Bulk Store - FMP Maintenance Workshop	☐
• Plant Maintenance Superintendents shall notify users whose supply will be cut off (this may be done first depending upon the severity of the break) requesting them to shut down valves to their system(s) namely – o Marthin Potgieter – 082 551 0217 o Johan Witbooi – 082 040 8333 o Stean Kroucamp - 083 460 3931 o Dennis Griffiths – 082 040 8883 o Brian Afrika – 072 011 1161 o Diavre George – 072 011 1722	☐
• Depending on the type of spill it needs to be determined if a specialist contractor (Spill Tech - 0832536618) is required for clean-up. If no specialist contractors are required (as confirmed by SHE Manager) then clean-up is to commence immediately.	☐
• Plant supervisor shall contact (Craig Gallant (Site Engineer – 0661622331)) to arrange any necessary repairs to the applicable facility.	☐

2. ACTIONS TO MINIMISE IMPACTS	
• If the incident occurs within the Plant boundary, the plant supervisor or designated deputy shall contain the spill wherever practicable, to prevent runoff into water resources and/or the stormwater drainage system. These actions should not compromise other health, environmental or safety considerations. Infiltration of the spill into vegetated/ grassed areas should be maximised in preference to allowing runoff to the stormwater drainage network.	☐
• If the incident occurs outside the Plant boundary, the plant supervisor or designated deputy shall instruct (Spill Tech - 0832536618) to arrange containment and clean-up of the spill (wherever practicable).	☐
• Disposal of spill and clean-up material must be undertaken at a Licence Landfill Site and must be removed by a registered waste removal company (EnviroServ - 0800192783).	☐

• Address course of spillage to avoid future issues.	

3. NOTIFICATION/REPORTING *Refer to Section 5 of the CP for relevant contact details and Annexure C for Emergency Contacts.* *The plant manager, or designated deputy shall:*	
• Contact persons as per the CP and Environmental Incident Reporting procedure.	☐
• Complete and circulate Environmental Incident Report (Appendix D).	☐

3. RECORDS *Document evidence that the plan was auctioned correctly:*	
• Completed Environmental Incident Report (Annexure D).	☐
• Completed SOPs Checklist.	☐

HAZARD 6:	
CAUSE	Vandalism
EFFECT	Damage to equipment or holding tanks could result in the escape of toxic products or wastewater.
LIKELIHOOD	Once a year or more often
CONSEQUENCE	Tier 2—environmental nuisance or material harm depending on the amount of hydrocarbon lost and the receiving environment
RISK TREATMENT	Installation of security and control devices (e.g. video surveillance, locking mechanisms etc.)

ACTIONS REQUIRED

The following actions shall be performed and ticked off as completed:

1. IMMEDIATE CORRECTIVE ACTIONS	
• Process operator shall contact the plant supervisor and plant manager to report the incident.	☐
• Should any spillage escape the bunded area or areas without collection 'grease trap' points – the SOP for Hazard 5 must be implemented.	☐
• Plant supervisor shall contact (Craig Gallant (Site Engineer – 0661622331)) to arrange any necessary repairs to the applicable facility.	☐

2. ACTIONS TO MINIMISE IMPACTS	
• Installation of security and control devices (e.g. video surveillance, locking mechanisms etc.)	☐

3. NOTIFICATION/REPORTING *Refer to Section 5 of the CP for relevant contact details and Annexure C for Emergency Contacts.* *The plant manager, or designated deputy shall:*

• Contact persons as per the CP and Environmental Incident Reporting procedure.	☐
• Complete and circulate Environmental Incident Report (Appendix D).	☐

3. RECORDS *Document evidence that the plan was auctioned correctly:*	
• Completed Environmental Incident Report (Annexure D).	☐

HAZARD 7:	
CAUSE	Accidental discharge of diesel, petrol, hydraulic liquid due to human or system errors; equipment damage, breakdown or faults.
EFFECT	Water pollution caused by hydrocarbons that degrade water quality and can harm wildlife and vegetation.
LIKELIHOOD	Once a year or more often
CONSEQUENCE	Tier 2—environmental nuisance or material harm depending on the amount of hydrocarbon lost and the receiving environment
RISK TREATMENT	• Availability of oil spill kit; • Availability of help telephone numbers; and • Availability of stepwise procedures to follow during spill events.

ACTIONS REQUIRED

The following actions shall be performed and ticked off as completed:

1. IMMEDIATE CORRECTIVE ACTIONS	
• Process operator shall contact the plant supervisor and plant manager to report the incident.	☐
• Process operator to immediately contain the incident and stop the source of spillage. Use loose soil and sand on the site to contain and absorb the spill. Implement clean up using the spill kits provided located: - Dispatch - Label Store - Boiler House - Generator Room - Jetty - Cannery Chemical Store - Bulk Store - FMP Maintenance Workshop	☐
• Plant Maintenance Superintendents shall notify users whose supply will be cut off (this may be done first depending upon the severity of the break) requesting them to shut down valves to their system(s) namely – o Marthin Potgieter – 082 551 0217 o Johan Witbooi – 082 040 8333 o Stean Kroucamp - 083 460 3931 o Dennis Griffiths – 082 040 8883	☐

○ Brian Afrika – 072 011 1161 ○ Diavre George – 072 011 1722	
• Depending on the type of spill it needs to be determined if a specialist contractor (Spill Tech - 0832536618) is required for clean-up. If no specialist contractors are required (as confirmed by SHE Manager) then clean-up is to commence immediately.	☐
• Plant supervisor shall contact (Craig Gallant (Site Engineer – 0661622331)) services to arrange any necessary repairs to the applicable facility.	☐

2. ACTIONS TO MINIMISE IMPACTS	
• If the incident occurs within the Plant boundary, the plant supervisor or designated deputy shall contain the spill wherever practicable, to prevent runoff into water resources and/or the stormwater drainage system. These actions should not compromise other health, environmental or safety considerations. Infiltration of the spill into vegetated/ grassed areas should be maximised in preference to allowing runoff to the stormwater drainage network.	☐
• If the incident occurs outside the Plant boundary, the plant supervisor or designated deputy shall instruct (Spill Tech - 0832536618) to arrange containment and clean-up of the spill (wherever practicable).	☐
• Disposal of spill and clean-up material must be undertaken at a Licence Landfill Site and must be removed by a registered waste removal company (EnviroServ - 0800192783).	☐
• Address course of spillage to avoid future issues.	

3. NOTIFICATION/REPORTING *Refer to Section 5 of the CP for relevant contact details and Annexure C for Emergency Contacts.* *The plant manager, or designated deputy shall:*	
• Contact persons as per the CP and Environmental Incident Reporting procedure.	☐
• Complete and circulate Environmental Incident Report (Appendix D).	☐

3. RECORDS *Document evidence that the plan was auctioned correctly:*	
• Completed Environmental Incident Report (Annexure D).	☐
• Completed SOPs Checklist.	☐

ANNEXURE 7: SOPS

Demersal Fish Trimming Handling

Document #: 01.03.26.02.01	SOP		
Rev: 1	**Effective date: February 2026**	**Reviewed date: N/A**	**Need revision: February 2029**
Approved by: The OHSE Office	**Jan-Taljaard Marx**	**Signed:**	

WEST POINT PROCESSORS (PTY) LTD.
A member of the Sea Harvest Group

Factory: PO Box 15, St Helena Bay, 7390 | Tel. (022) 736 1100 | Fax. (022) 736 1282

Tel. (021) 930-9695 | First Floor, 2 Kiepersol Close, Plattekloof, 7500 | PO Box 15109, Panorama, 7506

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Remember to perform your SLAMM



1. Purpose

This Standard Operating Procedure (SOP) documents the manner in which demersal fish trimmings (off-cuts) are sourced, transported, stored, offloaded and processed at West Point Processors (Pty) Ltd.

This SOP is developed in compliance with:

- The Atmospheric Emission Licence (AEL) variation
- Condition 6.1 and 7.7 of the AEL

The purpose is to:

- Maintain cold chain integrity
- Minimize the potential for odours
- Ensure traceability
- Integrate demersal trimmings into the existing fishmeal process in a controlled manner

2. Scope

This SOP applies to all demersal fish trimmings sourced from Sea Harvest and any additional legally compliant entities approved for use. The SOP is also applicable to all personnel involved in receiving, storing, handling, transporting and processing the material.

3. Definitions

Cold Chain: The controlled temperature management of raw material from source to processing to prevent deterioration.

Demersal Fish: Demersal fish are defined as species that inhabit (live, feed, and reside) on or near the bottom of oceans, seas, or lakes

Trimmings: Raw fish biomass generated during demersal fish processing, consisting of heads, frames, viscera, skin, bones and related anatomical parts.

Truck-in Raw Material: Demersal fish trimmings transported to the facility by road in temperature-controlled containers.

4. Responsibilities

i. Emission Control Officer (ECO)

- Ensure compliance with AEL conditions.
- Monitor complaints register.
- Be notified of spills or cold chain deviations.
- Ensure cold chain records are maintained.
- Notify Licensing Authority where required.

ii. Responsible Officer

- Ensure this SOP is implemented.
- Ensure adherence to the AEL conditions.

iii. Shift Supervisors

- Verify temperatures on arrival.
- Ensure processing within prescribed timeframes.
- Ensure cleaning of containers as required.

iv. Operators

- Maintain hygiene and housekeeping.
- Report deviations immediately.
- Ensure spill kits are available during offloading.

5. Procedure

i. Sourcing of Raw Material

1. Demersal fish trimmings are sourced from:
    - Sea Harvest fish processing plant, Saldanha.
    - Any additional entity that:

- Is legally compliant in terms of the Marine Living Resources Act.
- Is approved for use under the AEL.

ii. Cold Chain Management at Source

1. Trimmings may be:
   - Chilled; or
   - Frozen.
2. The raw material must be kept in a temperature-controlled environment at source.
3. Records of cold chain must be maintained and made available upon request.

iii. Transportation to Facility

1. Transport shall occur in:
   - Leak-proof,
   - Temperature-controlled containers.
2. Containers must:
   - Prevent liquid leakage,
   - Minimise odour release,
   - Maintain cold chain integrity.
3. The weighbridge may be utilised to record:
   - Gross mass,
   - Net mass,
   - Date and time of arrival.
4. Records must include:
   - Date and time of receipt,
   - Temperature on arrival,
   - Quantity received,
   - Source identification.

iv. Offloading and On-Site Storage

1. Upon arrival:
   - Containers are offloaded into designated on-site cold storage.
   - The cold chain must remain uninterrupted.
2. The temperature of the cold storage is continuously monitored.
3. Internal transport to processing occurs via:
   - Forklift,
   - Hopper system,
   - Conveyors.
4. Spill kits must be available during offloading.
5. In the event of a spill:
   - Immediate containment and clean-up must occur.
   - ECO must be notified.
   - Incident logged via internal reporting procedure.

v. Processing Requirements

1. Demersal fish trimmings:
   - May be blended with pelagic material; or
   - Processed separately.
2. Trucked-in raw material must be processed within 8 hours after removal from the site cold storage.
3. Records must reflect:
   - Date/time removed from cold storage.
   - Date/time processed.
   - Any issues or near-misses must be reported via the Alarm Report procedure.

vi. Cleaning Procedure

1. Containers and tubs used for transporting and storing demersal trimmings shall be cleaned:
   - In the designated cleaning area.
2. Cleaning may include:
   - High-pressure washing,
   - Removal of residues,
3. Cleaning must ensure:
   - No accumulation of residual biomass,
   - Prevention of decomposition,

6. Records

The following records must be retained:

- Cold chain temperature records.
- Date and time of receipt.
- Date and time of processing.
- Weighbridge records (where applicable).
- Spill incident reports.
- Complaints register.

7. Process Flow

The following process flow applies:

1. Source Facility
2. Temperature Controlled Containers
3. Road Transport
4. Weighbridge
5. On-Site Cold Storage

6. Forklift Retrieval
7. Hopper / Conveyor
8. Fishmeal Processing Stream

ANNEXURE 8: PERMITS & LICENCES

DEPARTMENT of
ENVIRONMENTAL AFFAIRS
& DEVELOPMENT PLANNING
Provincial Government of the Western Cape

DIRECTORATE: LAND MANAGEMENT
REGION 2

rgerner@pgwc.gov.za
tel: +27 21 483 3763 fax: +27 21 483 4372
1 Dorp Street, Cape Town, 8001
Private Bag X9086, Cape Town, 8000
www.capegateway.gov.za/eadp

REFERENCE: E12/2/3/1-F4/19-0554/08
ENQUIRIES: Mr. R. Gerner
DATE OF ISSUE:

22 NOV 2010

The Director
West Point Processing (Pty) Ltd.
P.O. Box 15
St. Helena Bay
7390

For attention: Mr. Gerhard Wiese

Tel: (022) 736 1100
Fax: (022) 736 1282

Dear Sir

APPLICATION: THE PROPOSED UPGRADE OF WEST POINT PROCESSING (PTY) LTD. FISH PROCESSING PLANT ON PORTION 3 OF ERF 1097 IN ST. HELENA BAY, WESTERN PROVINCE.

With reference to your application, find below the Environmental Authorisation in respect of this application.

ENVIRONMENTAL AUTHORISATION

A. DESCRIPTION OF ACTIVITY:

The proposed development entails the upgrading of West Point Processing (Pty) Ltd. (WPP) fish processing plant in St. Helena Bay. WPP produces canned fish and fish meal from pelagic fish. The upgrade will involve the replacement of redundant equipment with new fish meal processing technology. The new equipment will consist of 4 cookers, 2 prestrain scrappers, 4 presses, stickwater tanks, conveyers, 4 indirect driers, 2 direct driers, extraction fan, seawater scrubber, chemical scrubber, and alarm systems. Fish oil and stickwater is also produced during the fish meal process.

The footprint of the existing fish processing plant is approximately 3815m² and will be expanded by 636m² with the proposed upgrade.

The proposed upgrade will result in a reduction in the air and odour emissions released from the fish processing plant and the facility will therefore operate more efficiently.

Vehicular access and bulk connector services to the property already exist.

These are activities identified in:

GN No. R. 386 of 21 April 2006, being:

Activity 1(i): *The construction of facilities or infrastructure, including associated structures or infrastructure, for aquaculture production, including mariculture and algae farms, with a production throughput of 10 000kg or more per year.*

Directorate: Land Management (Region 2)

Activity 1(k): *The construction of facilities or infrastructure, including associated structures or infrastructure, for the bulk transportation of sewage and water, including storm water, in pipelines with –*

(i) an internal diameter of 0.36 metres or more; or
(ii) a peak throughput of 120 litres per second or more.

Activity 2: *Construction or earth moving activities in the sea or within 100 metres inland of the high-water mark of the sea, in respect of –*

(a) facilities for the storage of material and the maintenance of vessels;
(b) fixed or floating jetties and slipways;
(c) tidal pools;
(d) embankments;
(e) stabilising walls;
(f) buildings; or
(g) infrastructure.

Activity 6: The excavation, moving, moving, removal, depositing or compacting of soil, sand, rock or rubble covering an area exceeding 10 square metres in the sea or within a distance of 100 metres inland of the high-water mark of the sea;

GN No. R. 544 of 18 June 2010, being:

Activity 16: Construction or earth moving activities in the sea, an estuary, or within the littoral active zone or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater, in respect of –

(i) fixed or floating jetties and slipways;
(ii) tidal pools;
(iii) embankments;
(iv) rock revetments or stabilising structures including stabilising walls;
(v) buildings of 50 square metres or more; or
(vi) infrastructure covering 50 square metres or more –

but excluding

(a) if such construction or earth moving activities will occur behind a development setback line; or
(b) where such construction or earth moving activities will occur within existing ports or harbours and the construction or earth moving activities will not increase the development footprint or throughput capacity of the port or arbour;
(c) where such construction or earth moving activities is undertaken for purposes of maintenance of the facilities mentioned in (i)-(iv) above; or
(d) where such construction or earth moving activities is related to the construction of a port or harbour, in which case activity 24 of Notice 545 of 2010 applies.

Activity 18: 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 from

(i) a watercourse;
(ii) the sea;
(iii) the seashore;
(iv) 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 –

but excluding where such infilling, depositing, dredging, excavation, removal or moving

(i) is for maintenance purposes undertaken in accordance with a management plan agreed to by the relevant environmental authority; or
(ii) occurs behind the development setback line.

Activity 45: The expansion of facilities in the sea, an estuary, or within the littoral active or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater, for –

(i) fixed or floating jetties and slipways;
(ii) tidal pools;
(iii) embankments;
(iv) rock revetments or stabilising structures including stabilising walls;
(v) buildings by more than 50 square metres;
(vi) infrastructure by more than 50 square metres;
(vii) facilities associated with the arrival and departure of vessels and the handling of cargo;
(viii) piers;
(ix) inter- and sub-tidal structures for entrapment of sand;
(x) breakwater structures;
(xi) coastal marinas;
(xii) coastal harbours or ports;
(xiii) structures for draining parts of the sea or estuary;
(xiv) tunnels; or
(xv) underwater channels –

where such expansion will result in an increase in the development footprint of such facilities, but excluding where such expansion occurs:

(a) behind a development setback line; or
(b) within existing ports or harbours where there will be no increase in the development footprint or throughput capacity of the port or harbour.

Hereinafter referred to as "the activity".

B. LOCATION:

The proposed activity will be located on portion 3 of Erf 1097 in St. Helena Bay.

Co-ordinates: 32° 46' 36.11" South
18° 03' 00.14" East

Hereinafter referred to as "the site/property".

C. APPLICANT:

West Point Processing (Pty) Ltd.
c/o Mr Gerhard Wiese
P.O. Box 15
St. Helena Bay
7390

Tel: (022) 736 1100
Fax: (022) 736 1282

D. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP):

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

Tel: (028) 312 1734
Fax: (086) 508 3249

E. SITE VISIT(S):

Officials of the Department conducted a site visit to the subject property on 02 June 2010.

F. DECISION:

The Department is satisfied, on the basis of information available to it and subject to compliance with the conditions of this Environmental Authorisation that the applicant should be authorised to undertake the activity specified above.

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (NEMA)(Act No. 107 of 1998), the Environmental Impact Assessment (EIA) Regulations, (21 April 2006) and the NEMA EIA Regulations (18 June 2010) the Department hereby authorises the preferred alternative activity, i.e. the activity described above.

The granting of this Environmental Authorisation is subject to the conditions set out below.

G. CONDITIONS OF AUTHORISATION:

1. The activity, including site preparation, may not commence within 20 (twenty) days after having received this Environmental Authorisation. In the event that an appeal notice and subsequent appeal is lodged with the competent authority, the effect of this Environmental Authorisation will be suspended until such time as the appeal is decided.

2. One week's notice, in writing, must be given to the Directorate: Land Management (Region 2), (hereinafter referred to as "this Directorate"), before commencement of such construction activities.

   2.1. Such notice shall make clear reference to the site location details and reference number given above.

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

   Conditions: 1, 7 and 19.

3. An integrated waste management approach must be used that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of the relevant legislation.

4. The relevant requirements of the National Water Act, 1998 (Act No. 36 of 1998), Department of Water Affairs (DWA), National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) and the Department of Environmental Affairs must be complied

with at all times, which, *inter alia*, pertaining to abstraction of seawater and release of effluent into the marine environment.

5. The relevant requirements of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) must be complied with at all times, which, *inter alia*, pertaining to the release of air emissions into the atmosphere.

6. The relevant requirement of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) must be complied with at all times, which, *inter alia*, pertaining to the treatment and disposal of effluent.

7. The holder of the authorisation must appoint a suitably experienced Environmental Control Officer (ECO) before commencement of any land clearing or construction activities to ensure that the Construction Environmental Management Plan and the mitigation/rehabilitation measures and conditions referred to in this Environmental Authorisation are implemented and complied with.

8. The activities associated with the construction phase of the proposed activity must be restricted to the site.

9. All "No-Go" areas must be clearly demarcated prior to construction activities commencing to ensure adequate environmental protection are exercised during the construction phase.

10. Controlled access on the site must be ensured and maintained.

11. All equipment to be installed must be in line with the manufacturer's specifications

12. The following conditions with regard to the fish storage pits must be implemented:

    12.1. The internal wall and floor surfaces must be smoothed out and covered with suitable material to facilitate regular cleansing; and

    12.2. All raw and waste material must be processed during a specific shift and no build-up of material must be allowed.

13. The coal storage area must be upgraded to effectively contain the material in the specified demarcated area and no material is to accumulate outside this area.

14. All coal ash must be stored in an appropriate area and be removed from the site on a regular basis.

15. All above ground storage tanks containing stickwater and fish oil must be located within a bund (110% of the proposed tank's capacity) in order to contain potential spills.

16. Floor surfaces and external paved areas on the site must be appropriately graded and include drainage to prevent the formation of stagnant pools of water.

17. An air emissions report must be compiled after the upgrade of the WPP fish processing plant to measure the result of the upgrade against the relevant legislation and this report must be submitted to this Directorate.

18. The Construction and Operational Environmental Management Plan (EMP) submitted with the Basic Assessment Report, hereby approved by the Department, must be implemented by the Applicant and, *inter alia*, include the following:

    18.1. Where relevant, the EMP must be amended to reflect the conditions of approval of this Environmental Authorisation;

18.2. The EMP must be included in all contract documentation for the development;

18.3. This Directorate must be notified in writing of any proposed changes to the EMP due to additional information gained as a result of construction activities, and this Directorate must approve any proposed changes prior to implementation;

18.4. The ECO must notify this Directorate immediately of events or incidents that may cause significant environmental damage or breach the requirements of the EMP; and

18.5. The conditions/measures in the EMP must be strictly adhered to.

19. The applicant must in writing, within 12 (twelve) calendar days of the date of the decision on the application –

19.1. notify all registered interested and affected parties of –
- 19.1.1. the outcome of the application;
- 19.1.2. the reasons for the decision; and
- 19.1.3. the date of the decision;

19.2. Inform all registered interested and affected parties of the appeal procedure provided for in Chapter 7 of the Regulations.

19.3. Inform all registered interested and affected parties of the manner in which they can access the decision;

19.4. Advise all registered interested and affected parties that, should they wish to appeal, they must lodge a notice of intention to appeal with the Minister within 20 (twenty) days of date of the Department's decision and must submit their appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal.

19.5. Inform all registered interested and affected parties that the prescribed Notice of Intention to Appeal form and Appeal form are obtainable from the Minister's office at telephone number (021) 483 3721, or 483 3915, email icdevill@pgwc.gov.za or via the URL http://www.capegateway.gov.za/eadp.

19.6. Inform all registered interested and affected parties that should they wish to appeal, the appellant must serve on the applicant, within 10 (ten) days of having submitted the notice of intent to appeal with the Minister, a copy of the Notice of Intention to Appeal form as well as a notice indicating where and for what period the appeal submission will be available for inspection by the applicant.

19.7. If the applicant should decide to appeal the decision, the applicant must –
- 19.7.1. lodge a notice of intention to appeal with the Minister, within 20 (twenty) days after the date of the decision.
- 19.7.2. submit the appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal.
- 19.7.3. within 10 (ten) days of having lodged the notice of intention to appeal, provide each person and organ of State registered as an interested and affected party in respect of the application, with –
  - 19.7.3.1. a copy of the Notice of Intention to appeal form;
  - 19.7.3.2. a notice indicating where and for what period the appeal submission will be made available for inspection by such person or organ of State, on the day of lodging it with the Minister, and that a responding statement may be made on the appeal within 30 (thirty) days from the date the appeal submission was lodged with the Minister. A person, organ of state or applicant who submits a

responding statement in terms of regulation 63(1) must within 10 (ten) days of having submitted the responding statement, serve a copy of the statement on the appellant.

20. The holder of the authorisation shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including but not limited to, an agent, sub-contractor, employee or any person rendering a service to the holder of the authorisation.

21. Any changes to, or deviations from, the project description set out in this authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the Regulations.

22. The holder of the authorisation must notify this Directorate and any other relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.

23. A copy of this authorisation must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.

24. Where any of the applicant's contact details change, including the name of the responsible person, the physical or postal address and/ or telephonic details, the applicant must notify the Department as soon as the new details become known to the applicant.

25. Non-compliance with a condition of this authorisation may result in the suspension of the authorisation and may render the holder liable for criminal prosecution.

26. This Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. A request for the transfer of the rights and obligations contained in this environmental authorisation must be submitted in the following way:

    (i) The current holder of the environmental authorisation must submit an original signed letter to the Department stating that he/she wish the rights and obligations contained in this environmental authorisation to be transferred, provide the Department with (a) confirmation that the environmental authorisation is still in force (i.e. validity period have not yet expired or the activity(ies) was lawfully commenced with), (b) the contact details of the person to whom the rights and obligations are to be transferred, and (c) the reasons for the requested transfer.

    (ii) The person to whom the rights and obligations are to be transferred must also submit an original signed letter to the Department (a) accepting the rights and obligations contained in this environmental authorisation and (b) must indicate that he/she has the ability to implement the mitigation measures and to comply with the conditions of authorisation.

27. If the transfer is found to be appropriate by the Department, the Department will issue a letter confirming the transfer of the rights and obligations contained in this environmental authorisation.

28. Departmental officials shall be given access to the property referred to in B above for the purpose of assessing and/or monitoring compliance with the conditions contained in this Environmental Authorisation, at all reasonable times.

29. The activity which is authorised may only be carried out at the property indicated above.

30. Notwithstanding this authorisation, the holder of the authorisation must still comply with any other statutory requirements that may be applicable to the undertaking of the activity.

31. This activity must commence within a period of **3 years** from the date of issue. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.

H. REASONS FOR THE DECISION:

In reaching its decision, the Department took, *inter alia*, the following into consideration –

a) The information contained in the:

   i. Notice of Intent dated 21 November 2008 and received on 24 November 2008 by the Department;
   ii. Application Form and Basic Assessment Report dated 21 November 2008 and received 29 April 2009 by the Department;
   iii. Amended Basic Assessment Report dated January 2010 and received 26 January 2010 by the Department; and
   iv. Additional information requested 05 February 2010, 07 June 2010 and 27 September 2010 by the Department;

b) The objectives and requirements of relevant legislation, policies and guidelines, including Section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998); and

c) Relevant information contained in the Departmental information base.

All information presented to the Department was taken into account in the Department's consideration of the application. A summary of the issues which, in the Department's view, were of the most significance is set out below.

NEED AND DESIRABILITY AND SOCIO-ECONOMIC IMPACTS:

The West Point Processing (Pty) Ltd. (WPP) fish processing plant has been in operation since 1948. Appropriate management of time/temperature of raw product, catches per day, as well as proper cleaning of vessel-holds and the fish meal plant was not implemented and affected the freshness of the raw product used in the fish meal process. This in turn had a significant effect on the unbound ammoniac content of the fish meal and the rate of deterioration. The need therefore arose to upgrade the WPP fish processing plant to create a more efficient facility and reduce air emissions and odours. The site is located in the long existing fishing community of St. Helena Bay, fish processing being a dominant economic opportunity in the area. The relevant environmental legislation prescribes the management of effluent and air emissions, which the proposed upgrade of the WPP fish processing plant is intended to comply with.

The iced water in which fish is transported by fishing trawlers to WPP is screened, using a contra-shear for the fine screening of effluent from any solids, the fish is then transported to the cannery plant for processing. All fish-related effluent leaving the cannery plant is screened to remove solids and thereafter channelled into the sea. The solids removed from the abovementioned screening will be taken to the fish meal plant and utilized to make fish meal. All liquid matter involved in the fish meal process is condensed and added to the solids to be reworked into fish meal. Final effluent leaving the fish meal plant is screened to remove solids and thereafter discharched into the sea. WPP has submitted an application with the Department of Water Affairs for a Licence to discharge effluent into the marine environment. The current abstraction of seawater and discharge of effluent into the sea by WPP is monitored by the Department of Water Affairs.

The upgrade of the WPP fish processing plant will involve the replacement of redundant equipment with new fish meal technology resulting in an increase in efficiency and productivity of the plant. The surrounding community will benefit in that air emissions and odours released from the WPP fish processing plant will be reduced and the existing employment WPP offers will be maintained.

ALTERNATIVES INVESTIGATED:

The applicant considered only one site alternative and two activity alternatives, as well as the "no go" alternative.

Activity alternative 1 (Preferred activity alternative)
This activity alternative involves the decommissioning of an existing fish processing plant in Saldanha Bay. The fish meal technology equipment from the Saldanha plant will be used to upgrade the WPP fish processing plant. The new equipment will consist of 4 cookers, 2 prestrain scrapers, 4 presses, stickwater tanks, conveyers, 4 indirect driers, 2 direct driers, extraction fan, seawater scrubber, chemical scrubber, and alarm systems. The emissions from the WPP fish processing plant will be captured and taken through an odour reduction plant, which consists of the seawater scrubber to cool the emissions and condense the condensable fraction. Hereafter, the emissions are taken through a chemical scrubber to remove the non-condensable fraction, in so doing, reducing the air emissions from the WPP fish processing plant. All fish related effluent from the WPP fish processing plant is fine screened by a contra-shear to remove solids. Solids from the effluent are incorporated into the processing of fish meal and the resultant effluent is channelled into the sea.

Activity alternative 2:
This activity alternative involves the decommissioning on the WPP fish processing plant. The WPP fish processing plant will be closed down, taken apart and all the equipment sold. This activity alternative will have an adverse impact on the WPP employees and the fishing trawlers responsible for the catches delivered to WPP.

"No-Go" option:
This activity alternative involves not upgrading the WPP fish processing plant and the WPP fish processing plant will continue to operate at its current level. The existing equipment consist of 3 cookers, 3 presses, stickwater tanks, conveyers, 3 direct driers. The air emissions from the plant will remain at its current level and the fish meal equipment will become ever more redundant.

The proposed development is not expected to result in unacceptable environmental impacts with the implementation of the mitigation measures and new processing technology. Based on the biophysical, social and economic considerations, activity alternative 1 was determined to be the most reasonable and feasible, and hereby authorised by the Department.

BIOPHYSICAL ENVIRONMENT:

The site is situated in the St. Helena Bay located on the west coast of South Africa. The WPP fish processing plant is located on industrial land and the activities associated with the proposed development conforms to the surrounding land use of the area.

The biophysical impacts associated with the existing development are mainly associated with effluent release into the sea and air emission from the fish meal plant. The Department of Water Affairs does regular water monitoring checks on the effluent release from the site, which was determined to be in acceptable standards, and the Applicant has lodged an application for a water discharge permit with the Department of Water Affairs. The proposed upgrade of the WPP fish processing plant will result in a reduction in the air emission and odours release from the fish meal plant.

WASTE MANAGEMENT LICENCE:

WPP fish processing plant triggers activities listed in terms of Section 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), for which a Waste

Management Licence (E13/2/10/1-F4/19-2002/09) has been applied for. The applicable Waste Management Licence Activities are as follows:

Government Notice No. 718 - Category A:

11: The treatment of effluent, wastewater or sewage with an annual throughput capacity of more than 2000 cubic metres but less than 15000 cubic metres;

18: The construction of facilities for activities listed in Category A of the Schedule (not in isolation to associated); and

19: The expansion of facilities or changes to existing facilities for any process or activity, which requires an amendment of an existing permit or licence or a new permit or licence in terms of legislation governing the release of pollution, effluent or waste.

This Environmental Authorisation will be implemented in conjunction with the decision issued with respect to the Waste Management Licence Application.

NOISE AND VISUAL IMPACTS:

All noise and sounds generated during all phases of the proposed development will comply with the relevant SANS codes and standards. No pure tone sirens or sounds will be used unless in emergency situations, or when required with respect to relevant health and safety regulations. Silencers will be installed and maintained on machinery, trucks and earth moving equipment. No amplified music or related equipment will be allowed on site during construction. Work hours during the construction phase will be restricted to 07h00 - 18h00 (Mondays to Fridays), 07h00 - 14h00 (Saturdays) and there will be no operations on Sundays and public holidays.

The site is situated on industrial land and the proposed development involves the upgrade of the existing WPP fish processing plant, which has been designed to conform to the character of the existing fish processing plant.

SITE ACCESS:

Access to the site currently exist.

NATIONAL ENVIRONMENTAL MANAGEMENT PRINCIPLES:

The National Environmental Management Principles (set out in Section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), ("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; and
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures.

PUBLIC PARTICIPATION PROCESS:

The public participation process entailed:

- The fixing of notice boards at conspicuous places to the public on the site;

- Giving written notice to:
  - The owners and occupiers of land adjacent to the site;
  - The owners and occupiers of land within 100 metres of the boundary of the site and organisations of ratepayers that represents the community in the area;
  - Municipal councillors of the ward in which the site is situated;
  - Municipality that has jurisdiction in the area;
  - Organs of State having jurisdiction in respect of aspects of the activity; and

- Placing an advertisement in a local newspaper (Swartlander, 17 September 2008) and a regional newspaper (Die Burger, 08 September 2008).

- Interested and affected parties (I&AP) was identified during the basic assessment process and registered in terms of regulation 57 of GN No. R. 385 of 2006.

- Interested and affected parties identified during the basic assessment process include CapeNature, DEA: Marine and Coastal Management, Department of Water Affairs, DEA&DP: Waste Management, DEA&DP: Air Quality Management, and the West Coast District Municipality. Comments with respect to the Basic Assessment Report were received from the Department of Water Affairs, CapeNature, DEA&DP: Waste Management and the West Coast District Municipality. Issues raised by these key commenting authorities were responded to by the EAP, and considered in this authorisation.

The Department is satisfied with the PPP that was undertaken for the proposed development. Important conditions as required by the abovementioned commenting authorities have been put in as conditions in this Environmental Authorisation.

In view of the above, this Directorate is satisfied that, subject to compliance with the conditions contained in the Environmental Authorisation, the proposed activity will not conflict with the general objectives of Integrated Environmental Management laid down 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 proposed activity can be mitigated to acceptable levels. The application is accordingly granted.

I. APPEAL:

Appeals must comply with the provisions as outlined in Chapter 7 of the Regulations.

If the applicant should decide to appeal, the applicant must, *in terms of*, regulation 60(1), lodge a notice of intention to appeal with the Minister, within 20 (twenty) days after the date of the decision, and must within 10 (ten) days of having submitted the notice contemplated in regulation 60(1), provide each person and organ of State registered as an interested and affected party in respect of the application with a copy of the Notice of Intention to Appeal; a notice indicating where and for what period the appeal submission will be made available for inspection by such person or organ of State on the day of lodging it with the Minister, and indicate that a responding statement may be made on the appeal within 30 (thirty)days from the date the appeal submission was lodged with the Minister.

A person, organ of state or applicant who submits a responding statement in terms of regulation 63(1) must within 10 (ten) days of having submitted the responding statement, serve a copy of the statement on the appellant.

If the applicant should decide to appeal, the applicant must submit the appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal.

Should any other person, or an interested and affected party, decide to appeal, they must, in terms of, regulation 60(1), lodge a notice of intention to appeal with the Minister, within 20 (twenty) days

after the date of the decision. An appeal must be submitted within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1).

The appellant must provide the applicant, within 10 days of having lodged the notice contemplated in regulation 60(1), with a copy of the notice referred to in regulation 60(1), and a notice indicating where and for what period the appeal submission will be available for inspection by the applicant. A responding statement may be made on the appeal within 30 (thirty) days from the date the appeal submission was lodged with the Minister.
The prescribed Notice of Intention to Appeal form and Appeal form are obtainable from the Minister's office, as well as assistance regarding the appeal processes, at telephone number (021) 483 3721, or 483 3915, email jedevill@pgwc.gov.za or via the URL http://www.capegateway.gov.za/eadp.

All Notice of Intention to Appeal and Appeal forms must be submitted by means of one of the following methods:

By post: Western Cape Minister of Local Government, Environmental Affairs and Development Planning
Private Bag X9186
Cape Town
8000

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Jaap de Villiers
09th floor Utilitas Building
1 Dorp Street
Cape Town
8001

A prescribed Notice of Intent to Appeal form and Appeal form is obtainable from the Minister's office at tel (021) 483 3721, email jedevill@pgwc.gov.za or URL http://www.capegateway.gov.za/eadp.

Provincial Government, Local Authority or committees appointed in terms of the conditions of the application or any other public authority or organisation shall not be held responsible for any damages or losses suffered by the developer or his successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the developer with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.

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

Yours faithfully

ANTHONY BARNES
DIRECTOR: INTEGRATED ENVIRONMENTAL MANAGEMENT (REGION B)
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Date of decision: 22-11-2010

CC: 1. Mr. P. Fabricius (West Coast District Municipality)
2. Mr. P. Slabbert (PHS Consulting)

Fax: (022) 713 5952
Fax: (086) 508 3249

E12/2/3/1-F4/19-0554/08

Western Cape Government
Environmental Affairs and Development Planning

Directorate: Development Management
Region 1

EIA REFERENCE NUMBER: 16/3/3/5/F4/20/3035/16
ENQUIRIES: Mr. S. Abrahams
DATE OF ISSUE: 2016 -07- 07

The Director
West Point Processors (Pty) Ltd.
P.O. Box 15
ST HELENA BAY
7590

For Attention: Mr. J. Strydom

Tel: (022) 736 1100
Tel: (022) 736 1282

Dear Sir

AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ISSUED ON 22 NOVEMBER 2010 (REF. NO. E12/2/3/1-F4/19-0554/08) FOR THE PROPOSED UPGRADE OF THE WEST POINT FISH PROCESSING PLANT ON PORTION 3 OF ERF 1097, ST HELENA BAY.

With reference to your application, find below the amended environmental authorisation in respect of this application.

AMENDED ENVIRONMENTAL AUTHORISATION

A. DECISION

With reference to the above-mentioned application, the Competent Authority in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) ("NEMA") Environmental Impact Assessment ("EIA") Regulations as defined in GN No. R. 982 of 04 December 2014, hereby amends the EA issued on 22 November 2010 (Ref. No. E12/2/3/1-F4/19-0554/08), as follows:

1. Section A (Description of Activity) of the original Environmental Authorisation ("EA") issued on 22 November 2010 (Ref. No. E12/2/3/1-F4/19-0554/08) which reads:

   "The proposed development entails the upgrading of West Point Processing (Pty) Ltd. (WPP) fish processing plant in St. Helena Bay. WPP produces canned fish and fish meal from pelagic fish. The upgrade will involve the replacement of redundant equipment with new fish meal processing technology. The new equipment will consist of 4 cookers, 2 prestrain scrappers, 4 presses, stickwater tanks, conveyers, 4 indirect driers, 2 direct driers, extraction fan, seawater scrubber, chemical scrubber, and alarm systems. Fish oil and stickwater is also produced during the fish meal process.

   The footprint of the existing fish processing plant is approximately 3815m² and will be expanded by 636m² with the proposed upgrade.

The proposed upgrade will result in a reduction in the air and odour emissions released from the fish processing plant and the facility will therefore operate more efficiently.

Vehicular access and bulk connector services to the property already exist."

This is herewith substituted with:

"The proposed development entails the upgrading of West Point Processing (Pty) Ltd. (WPP) fish processing plant in St. Helena Bay. WPP produces canned fish and fish meal from pelagic fish. The upgrade will involve the replacement of redundant equipment with new fish meal processing technology. The new equipment will consist of cookers, separating equipment, presses, stickwater tanks, conveyers, steam driers, extraction fan, seawater scrubber, chemical scrubber, and an alarm system. Fish oil and stickwater is also produced during the fish meal process.

The footprint of the existing fish processing plant is approximately 3815m² and will be expanded by 636m² with the proposed upgrade.

The proposed upgrade will result in a reduction in the air and odour emissions released from the fish processing plant and the facility will therefore operate more efficiently.

Vehicular access and bulk connector services to the property already exist."

2. Please find attached herein a copy of the 22 November 2010 (Ref. No. E12/2/3/1-F4/19-0554/08) Appendix A for ease of reference.

B. REASONS FOR THE DECISION TO AMEND THE ENVIRONMENTAL AUTHORISATION:

1. The application is for the non-substantive amendment to the EA issued by this Directorate on 22 November 2010 (Ref. No. E12/2/3/1-F4/19-0554/08) and the additional information received by this Directorate on 27 June 2016.

2. In reaching its decision, the Department, *inter alia,* considered the information contained in the application form for the amendment of the EA dated 02 June 2016 and received by the Department on 07 June 2016.

3. The amendment to the original EA issued by the Department is to remove the specific number of equipment required. The amendment is required as the specific number of equipment could potentially change in the future due to the available technology. The proposed amendment will minimise odour emissions.

4. There are no proposed changes to the original scope of the application.

5. The environment and the rights and interests of interested and affected parties are not likely to be adversely affected by this decision to change the description of the new equipment.

6. The conditions of the EA issued on 22 November 2010 will remain unchanged and valid.

C. APPEAL:

Appeals must comply with the provisions contained in the National Appeal Regulations 2014.

1. An appellant must –

   1.1. Submit an appeal in accordance with Regulation 4 to the appeal administrator, within 20 (twenty) calendar days from the date the applicant notified registered I&APs of this decision;

1.2. If the appellant is the applicant, provide any registered I&AP, any Organ of State and the decision-maker with a copy of the appeal lodged with the appeal administrator; and

1.3. If the appellant is a person other than the applicant, provide any registered I&AP, any Organ of State and the decision-maker with a copy of the appeal lodged with the appeal administrator.

2. The applicant (if not the appellant) the decision-maker, I&APs and Organ of State must submit their responding statement, if any, to the appeal authority and the appellant within 20 days from the date of receipt of the appeal submission.

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

By post: Attention: Jaap de Villiers
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 J. de Villiers (Tel: 021 483 3721)
Room 809
8th Floor Utilitas Building, 1 Dorp Street, Cape Town, 8001

4. A 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: Jaap.deVilliers@westerncape.gov.za or URL http://www.westerncape.gov.za.

D. DISCLAIMER

The Western Cape Government, the Local Authority, 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.

Yours faithfully

ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

DATE OF DECISION: 07/07/2016

Copies to: (1) Mr. P. Fabricius (West Coast District Municipality) Fax: (022) 713 5952
(2) Mr. P. Slabbert (PHS Consulting) Fax: (086) 508 3249
(3) Ms. N. Duarte (Saldanha Bay Municipality) Fax: (022) 715 1518

Appendix A: Copy of the Environmental Authorisation issued on 22 November 2010 (EIA Ref E12/2/3/1-F4/19-0554/08

DEPARTMENT of
ENVIRONMENTAL AFFAIRS
& DEVELOPMENT PLANNING
Provincial Government of the Western Cape

DIRECTORATE: LAND MANAGEMENT REGION 2

rgerner@pgwc.gov.za
tel: +27 21 483 3763 fax: +27 21 483 4372
1 Dorp Street, Cape Town, 8001
Private Bag X9086, Cape Town, 8000
www.capegateway.gov.za/eadp

REFERENCE: E12/2/3/1-F4/19-0554/08
ENQUIRIES: Mr. R. Gerner
DATE OF ISSUE:

22 NOV 2010

The Director
West Point Processing (Pty) Ltd.
P.O. Box 15
St. Helena Bay
7390

For attention: Mr. Gerhard Wiese

Tel: (022) 736 1100
Fax: (022) 736 1282

Dear Sir

APPLICATION: THE PROPOSED UPGRADE OF WEST POINT PROCESSING (PTY) LTD. FISH PROCESSING PLANT ON PORTION 3 OF ERF 1097 IN ST. HELENA BAY, WESTERN PROVINCE.

With reference to your application, find below the Environmental Authorisation in respect of this application.

ENVIRONMENTAL AUTHORISATION

A. DESCRIPTION OF ACTIVITY:

The proposed development entails the upgrading of West Point Processing (Pty) Ltd. (WPP) fish processing plant in St. Helena Bay. WPP produces canned fish and fish meal from pelagic fish. The upgrade will involve the replacement of redundant equipment with new fish meal processing technology. The new equipment will consist of 4 cookers, 2 prestrain scrappers, 4 presses, stickwater tanks, conveyers, 4 indirect driers, 2 direct driers, extraction fan, seawater scrubber, chemical scrubber, and alarm systems. Fish oil and stickwater is also produced during the fish meal process.

The footprint of the existing fish processing plant is approximately 3815m² and will be expanded by 636m² with the proposed upgrade.

The proposed upgrade will result in a reduction in the air and odour emissions released from the fish processing plant and the facility will therefore operate more efficiently.

Vehicular access and bulk connector services to the property already exist.

These are activities identified in:

GN No. R. 386 of 21 April 2006, being:

Activity 1(i): *The construction of facilities or infrastructure, including associated structures or infrastructure, for aquaculture production, including mariculture and algae farms, with a production throughput of 10 000kg or more per year.*

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Activity 1(k): *The construction of facilities or infrastructure, including associated structures or infrastructure, for the bulk transportation of sewage and water, including storm water, in pipelines with –*

(i) an internal diameter of 0.36 metres or more; or
(ii) a peak throughput of 120 litres per second or more.

Activity 2: *Construction or earth moving activities in the sea or within 100 metres inland of the high-water mark of the sea, in respect of –*

(a) facilities for the storage of material and the maintenance of vessels;
(b) fixed or floating jetties and slipways;
(c) tidal pools;
(d) embankments;
(e) stabilising walls;
(f) buildings; or
(g) infrastructure.

Activity 6: The excavation, moving, moving, removal, depositing or compacting of soil, sand, rock or rubble covering an area exceeding 10 square metres in the sea or within a distance of 100 metres inland of the high-water mark of the sea;

GN No. R. 544 of 18 June 2010, being:

Activity 16: Construction or earth moving activities in the sea, an estuary, or within the littoral active zone or a distance of 100 metres inland of the high water mark of the sea or an estuary, whichever is the greater, in respect of –

(i) fixed or floating jetties and slipways;
(ii) tidal pools;
(iii) embankments;
(iv) rock revetments or stabilising structures including stabilising walls;
(v) buildings of 50 square metres or more; or
(vi) infrastructure covering 50 square metres or more –

but excluding

(a) if such construction or earth moving activities will occur behind a development setback line; or
(b) where such construction or earth moving activities will occur within existing ports or harbours and the construction or earth moving activities will not increase the development footprint or throughput capacity of the port or arbour;
(c) where such construction or earth moving activities is undertaken for purposes of maintenance of the facilities mentioned in (i)-(iv) above; or
(d) where such construction or earth moving activities is related to the construction of a port or harbour, in which case activity 24 of Notice 545 of 2010 applies.

Activity 18: 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 from

(i) a watercourse;
(ii) the sea;
(iii) the seashore;
(iv) 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 –

but excluding where such infilling, depositing, dredging, excavation, removal or moving

(i) is for maintenance purposes undertaken in accordance with a management plan agreed to by the relevant environmental authority; or
(ii) occurs behind the development setback line.

Activity 45: The expansion of facilities in the sea, an estuary, or within the littoral active or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater, for –

(i) fixed or floating jetties and slipways;
(ii) tidal pools;
(iii) embankments;
(iv) rock revetments or stabilising structures including stabilising walls;
(v) buildings by more than 50 square metres;
(vi) infrastructure by more than 50 square metres;
(vii) facilities associated with the arrival and departure of vessels and the handling of cargo;
(viii) piers;
(ix) inter- and sub-tidal structures for entrapment of sand;
(x) breakwater structures;
(xi) coastal marinas;
(xii) coastal harbours or ports;
(xiii) structures for draining parts of the sea or estuary;
(xiv) tunnels; or
(xv) underwater channels –

where such expansion will result in an increase in the development footprint of such facilities, but excluding where such expansion occurs:

(a) behind a development setback line; or
(b) within existing ports or harbours where there will be no increase in the development footprint or throughput capacity of the port or harbour.

Hereinafter referred to as "the activity".

B. LOCATION:

The proposed activity will be located on portion 3 of Erf 1097 in St. Helena Bay.

Co-ordinates: 32° 46' 36.11" South
18° 03' 00.14" East

Hereinafter referred to as "the site/property".

C. APPLICANT:

West Point Processing (Pty) Ltd.
c/o Mr Gerhard Wiese
P.O. Box 15
St. Helena Bay
7390

Tel: (022) 736 1100
Fax: (022) 736 1282

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D. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP):

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

Tel: (028) 312 1734
Fax: (086) 508 3249

E. SITE VISIT(S):

Officials of the Department conducted a site visit to the subject property on 02 June 2010.

F. DECISION:

The Department is satisfied, on the basis of information available to it and subject to compliance with the conditions of this Environmental Authorisation that the applicant should be authorised to undertake the activity specified above.

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (NEMA)(Act No. 107 of 1998), the Environmental Impact Assessment (EIA) Regulations, (21 April 2006) and the NEMA EIA Regulations (18 June 2010) the Department hereby authorises the preferred alternative activity, i.e. the activity described above.

The granting of this Environmental Authorisation is subject to the conditions set out below.

G. CONDITIONS OF AUTHORISATION:

1. The activity, including site preparation, may not commence within 20 (twenty) days after having received this Environmental Authorisation. In the event that an appeal notice and subsequent appeal is lodged with the competent authority, the effect of this Environmental Authorisation will be suspended until such time as the appeal is decided.

2. One week's notice, in writing, must be given to the Directorate: Land Management (Region 2), (hereinafter referred to as "this Directorate"), before commencement of such construction activities.

   2.1. Such notice shall make clear reference to the site location details and reference number given above.

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

   Conditions: 1, 7 and 19.

3. An integrated waste management approach must be used that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of the relevant legislation.

4. The relevant requirements of the National Water Act, 1998 (Act No. 36 of 1998), Department of Water Affairs (DWA), National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) and the Department of Environmental Affairs must be complied

with at all times, which, *inter alia*, pertaining to abstraction of seawater and release of effluent into the marine environment.

5. The relevant requirements of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) must be complied with at all times, which, *inter alia*, pertaining to the release of air emissions into the atmosphere.

6. The relevant requirement of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) must be complied with at all times, which, *inter alia*, pertaining to the treatment and disposal of effluent.

7. The holder of the authorisation must appoint a suitably experienced Environmental Control Officer (ECO) before commencement of any land clearing or construction activities to ensure that the Construction Environmental Management Plan and the mitigation/rehabilitation measures and conditions referred to in this Environmental Authorisation are implemented and complied with.

8. The activities associated with the construction phase of the proposed activity must be restricted to the site.

9. All "No-Go" areas must be clearly demarcated prior to construction activities commencing to ensure adequate environmental protection are exercised during the construction phase.

10. Controlled access on the site must be ensured and maintained.

11. All equipment to be installed must be in line with the manufacturer's specifications

12. The following conditions with regard to the fish storage pits must be implemented:

    12.1. The internal wall and floor surfaces must be smoothed out and covered with suitable material to facilitate regular cleansing; and

    12.2. All raw and waste material must be processed during a specific shift and no build-up of material must be allowed.

13. The coal storage area must be upgraded to effectively contain the material in the specified demarcated area and no material is to accumulate outside this area.

14. All coal ash must be stored in an appropriate area and be removed from the site on a regular basis.

15. All above ground storage tanks containing stickwater and fish oil must be located within a bund (110% of the proposed tank's capacity) in order to contain potential spills.

16. Floor surfaces and external paved areas on the site must be appropriately graded and include drainage to prevent the formation of stagnant pools of water.

17. An air emissions report must be compiled after the upgrade of the WPP fish processing plant to measure the result of the upgrade against the relevant legislation and this report must be submitted to this Directorate.

18. The Construction and Operational Environmental Management Plan (EMP) submitted with the Basic Assessment Report, hereby approved by the Department, must be implemented by the Applicant and, *inter alia*, include the following:

    18.1. Where relevant, the EMP must be amended to reflect the conditions of approval of this Environmental Authorisation;

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18.2. The EMP must be included in all contract documentation for the development;

18.3. This Directorate must be notified in writing of any proposed changes to the EMP due to additional information gained as a result of construction activities, and this Directorate must approve any proposed changes prior to implementation;

18.4. The ECO must notify this Directorate immediately of events or incidents that may cause significant environmental damage or breach the requirements of the EMP; and

18.5. The conditions/measures in the EMP must be strictly adhered to.

19. The applicant must in writing, within 12 (twelve) calendar days of the date of the decision on the application –

19.1. notify all registered interested and affected parties of –
19.1.1. the outcome of the application;
19.1.2. the reasons for the decision; and
19.1.3. the date of the decision;

19.2. Inform all registered interested and affected parties of the appeal procedure provided for in Chapter 7 of the Regulations.

19.3. Inform all registered interested and affected parties of the manner in which they can access the decision;

19.4. Advise all registered interested and affected parties that, should they wish to appeal, they must lodge a notice of intention to appeal with the Minister within 20 (twenty) days of date of the Department's decision and must submit their appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal.

19.5. Inform all registered interested and affected parties that the prescribed Notice of Intention to Appeal form and Appeal form are obtainable from the Minister's office at telephone number (021) 483 3721, or 483 3915, email jedevill@pgwc.gov.za or via the URL http://www.capegateway.gov.za/eadp.

19.6. Inform all registered interested and affected parties that should they wish to appeal, the appellant must serve on the applicant, within 10 (ten) days of having submitted the notice of intent to appeal with the Minister, a copy of the Notice of Intention to Appeal form as well as a notice indicating where and for what period the appeal submission will be available for inspection by the applicant.

19.7. If the applicant should decide to appeal the decision, the applicant must –
19.7.1. lodge a notice of intention to appeal with the Minister, within 20 (twenty) days after the date of the decision.
19.7.2. submit the appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal.
19.7.3. within 10 (ten) days of having lodged the notice of intention to appeal, provide each person and organ of State registered as an interested and affected party in respect of the application, with –
19.7.3.1. a copy of the Notice of Intention to appeal form;
19.7.3.2. a notice indicating where and for what period the appeal submission will be made available for inspection by such person or organ of State, on the day of lodging it with the Minister, and that a responding statement may be made on the appeal within 30 (thirty) days from the date the appeal submission was lodged with the Minister. A person, organ of state or applicant who submits a

responding statement in terms of regulation 63(1) must within 10 (ten) days of having submitted the responding statement, serve a copy of the statement on the appellant.

20. The holder of the authorisation shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including but not limited to, an agent, sub-contractor, employee or any person rendering a service to the holder of the authorisation.

21. Any changes to, or deviations from, the project description set out in this authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the Regulations.

22. The holder of the authorisation must notify this Directorate and any other relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.

23. A copy of this authorisation must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.

24. Where any of the applicant's contact details change, including the name of the responsible person, the physical or postal address and/ or telephonic details, the applicant must notify the Department as soon as the new details become known to the applicant.

25. Non-compliance with a condition of this authorisation may result in the suspension of the authorisation and may render the holder liable for criminal prosecution.

26. This Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. A request for the transfer of the rights and obligations contained in this environmental authorisation must be submitted in the following way:

    (i) The current holder of the environmental authorisation must submit an original signed letter to the Department stating that he/she wish the rights and obligations contained in this environmental authorisation to be transferred, provide the Department with (a) confirmation that the environmental authorisation is still in force (i.e. validity period have not yet expired or the activity(ies) was lawfully commenced with), (b) the contact details of the person to whom the rights and obligations are to be transferred, and (c) the reasons for the requested transfer.

    (ii) The person to whom the rights and obligations are to be transferred must also submit an original signed letter to the Department (a) accepting the rights and obligations contained in this environmental authorisation and (b) must indicate that he/she has the ability to implement the mitigation measures and to comply with the conditions of authorisation.

27. If the transfer is found to be appropriate by the Department, the Department will issue a letter confirming the transfer of the rights and obligations contained in this environmental authorisation.

28. Departmental officials shall be given access to the property referred to in B above for the purpose of assessing and/or monitoring compliance with the conditions contained in this Environmental Authorisation, at all reasonable times.

29. The activity which is authorised may only be carried out at the property indicated above.

30. Notwithstanding this authorisation, the holder of the authorisation must still comply with any other statutory requirements that may be applicable to the undertaking of the activity.

31. This activity must commence within a period of **3 years** from the date of issue. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for Environmental Authorisation must be made in order for the activity to be undertaken.

H. REASONS FOR THE DECISION:

In reaching its decision, the Department took, *inter alia*, the following into consideration –

a) The information contained in the:

   i. Notice of Intent dated 21 November 2008 and received on 24 November 2008 by the Department;
   ii. Application Form and Basic Assessment Report dated 21 November 2008 and received 29 April 2009 by the Department;
   iii. Amended Basic Assessment Report dated January 2010 and received 26 January 2010 by the Department; and
   iv. Additional information requested 05 February 2010, 07 June 2010 and 27 September 2010 by the Department;

b) The objectives and requirements of relevant legislation, policies and guidelines, including Section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998); and

c) Relevant information contained in the Departmental information base.

All information presented to the Department was taken into account in the Department's consideration of the application. A summary of the issues which, in the Department's view, were of the most significance is set out below.

NEED AND DESIRABILITY AND SOCIO-ECONOMIC IMPACTS:

The West Point Processing (Pty) Ltd. (WPP) fish processing plant has been in operation since 1948. Appropriate management of time/temperature of raw product, catches per day, as well as proper cleaning of vessel-holds and the fish meal plant was not implemented and affected the freshness of the raw product used in the fish meal process. This in turn had a significant effect on the unbound ammoniac content of the fish meal and the rate of deterioration. The need therefore arose to upgrade the WPP fish processing plant to create a more efficient facility and reduce air emissions and odours. The site is located in the long existing fishing community of St. Helena Bay, fish processing being a dominant economic opportunity in the area. The relevant environmental legislation prescribes the management of effluent and air emissions, which the proposed upgrade of the WPP fish processing plant is intended to comply with.

The iced water in which fish is transported by fishing trawlers to WPP is screened, using a contra-shear for the fine screening of effluent from any solids, the fish is then transported to the cannery plant for processing. All fish-related effluent leaving the cannery plant is screened to remove solids and thereafter channelled into the sea. The solids removed from the abovementioned screening will be taken to the fish meal plant and utilized to make fish meal. All liquid matter involved in the fish meal process is condensed and added to the solids to be reworked into fish meal. Final effluent leaving the fish meal plant is screened to remove solids and thereafter discharched into the sea. WPP has submitted an application with the Department of Water Affairs for a Licence to discharge effluent into the marine environment. The current abstraction of seawater and discharge of effluent into the sea by WPP is monitored by the Department of Water Affairs.

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The upgrade of the WPP fish processing plant will involve the replacement of redundant equipment with new fish meal technology resulting in an increase in efficiency and productivity of the plant. The surrounding community will benefit in that air emissions and odours released from the WPP fish processing plant will be reduced and the existing employment WPP offers will be maintained.

ALTERNATIVES INVESTIGATED:

The applicant considered only one site alternative and two activity alternatives, as well as the "no go" alternative.

Activity alternative 1 (Preferred activity alternative)
This activity alternative involves the decommissioning of an existing fish processing plant in Saldanha Bay. The fish meal technology equipment from the Saldanha plant will be used to upgrade the WPP fish processing plant. The new equipment will consist of 4 cookers, 2 prestrain scrapers, 4 presses, stickwater tanks, conveyers, 4 indirect driers, 2 direct driers, extraction fan, seawater scrubber, chemical scrubber, and alarm systems. The emissions from the WPP fish processing plant will be captured and taken through an odour reduction plant, which consists of the seawater scrubber to cool the emissions and condense the condensable fraction. Hereafter, the emissions are taken through a chemical scrubber to remove the non-condensable fraction, in so doing, reducing the air emissions from the WPP fish processing plant. All fish related effluent from the WPP fish processing plant is fine screened by a contra-shear to remove solids. Solids from the effluent are incorporated into the processing of fish meal and the resultant effluent is channelled into the sea.

Activity alternative 2:
This activity alternative involves the decommissioning on the WPP fish processing plant. The WPP fish processing plant will be closed down, taken apart and all the equipment sold. This activity alternative will have an adverse impact on the WPP employees and the fishing trawlers responsible for the catches delivered to WPP.

"No-Go" option:
This activity alternative involves not upgrading the WPP fish processing plant and the WPP fish processing plant will continue to operate at its current level. The existing equipment consist of 3 cookers, 3 presses, stickwater tanks, conveyers, 3 direct driers. The air emissions from the plant will remain at its current level and the fish meal equipment will become ever more redundant.

The proposed development is not expected to result in unacceptable environmental impacts with the implementation of the mitigation measures and new processing technology. Based on the biophysical, social and economic considerations, activity alternative 1 was determined to be the most reasonable and feasible, and hereby authorised by the Department.

BIOPHYSICAL ENVIRONMENT:

The site is situated in the St. Helena Bay located on the west coast of South Africa. The WPP fish processing plant is located on industrial land and the activities associated with the proposed development conforms to the surrounding land use of the area.

The biophysical impacts associated with the existing development are mainly associated with effluent release into the sea and air emission from the fish meal plant. The Department of Water Affairs does regular water monitoring checks on the effluent release from the site, which was determined to be in acceptable standards, and the Applicant has lodged an application for a water discharge permit with the Department of Water Affairs. The proposed upgrade of the WPP fish processing plant will result in a reduction in the air emission and odours release from the fish meal plant.

WASTE MANAGEMENT LICENCE:

WPP fish processing plant triggers activities listed in terms of Section 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), for which a Waste

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Management Licence (E13/2/10/1-F4/19-2002/09) has been applied for. The applicable Waste Management Licence Activities are as follows:

Government Notice No. 718 - Category A:

11: The treatment of effluent, wastewater or sewage with an annual throughput capacity of more than 2000 cubic metres but less than 15000 cubic metres;

18: The construction of facilities for activities listed in Category A of the Schedule (not in isolation to associated); and

19: The expansion of facilities or changes to existing facilities for any process or activity, which requires an amendment of an existing permit or licence or a new permit or licence in terms of legislation governing the release of pollution, effluent or waste.

This Environmental Authorisation will be implemented in conjunction with the decision issued with respect to the Waste Management Licence Application.

NOISE AND VISUAL IMPACTS:

All noise and sounds generated during all phases of the proposed development will comply with the relevant SANS codes and standards. No pure tone sirens or sounds will be used unless in emergency situations, or when required with respect to relevant health and safety regulations. Silencers will be installed and maintained on machinery, trucks and earth moving equipment. No amplified music or related equipment will be allowed on site during construction. Work hours during the construction phase will be restricted to 07h00 - 18h00 (Mondays to Fridays), 07h00 - 14h00 (Saturdays) and there will be no operations on Sundays and public holidays.

The site is situated on industrial land and the proposed development involves the upgrade of the existing WPP fish processing plant, which has been designed to conform to the character of the existing fish processing plant.

SITE ACCESS:

Access to the site currently exist.

NATIONAL ENVIRONMENTAL MANAGEMENT PRINCIPLES:

The National Environmental Management Principles (set out in Section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), ("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; and
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures.

PUBLIC PARTICIPATION PROCESS:

The public participation process entailed:

- The fixing of notice boards at conspicuous places to the public on the site;

- Giving written notice to:
  - The owners and occupiers of land adjacent to the site;
  - The owners and occupiers of land within 100 metres of the boundary of the site and organisations of ratepayers that represents the community in the area;
  - Municipal councillors of the ward in which the site is situated;
  - Municipality that has jurisdiction in the area;
  - Organs of State having jurisdiction in respect of aspects of the activity; and

- Placing an advertisement in a local newspaper (Swartlander, 17 September 2008) and a regional newspaper (Die Burger, 08 September 2008).

- Interested and affected parties (I&AP) was identified during the basic assessment process and registered in terms of regulation 57 of GN No. R. 385 of 2006.

- Interested and affected parties identified during the basic assessment process include CapeNature, DEA: Marine and Coastal Management, Department of Water Affairs, DEA&DP: Waste Management, DEA&DP: Air Quality Management, and the West Coast District Municipality. Comments with respect to the Basic Assessment Report were received from the Department of Water Affairs, CapeNature, DEA&DP: Waste Management and the West Coast District Municipality. Issues raised by these key commenting authorities were responded to by the EAP, and considered in this authorisation.

The Department is satisfied with the PPP that was undertaken for the proposed development. Important conditions as required by the abovementioned commenting authorities have been put in as conditions in this Environmental Authorisation.

In view of the above, this Directorate is satisfied that, subject to compliance with the conditions contained in the Environmental Authorisation, the proposed activity will not conflict with the general objectives of Integrated Environmental Management laid down 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 proposed activity can be mitigated to acceptable levels. The application is accordingly granted.

I. APPEAL:

Appeals must comply with the provisions as outlined in Chapter 7 of the Regulations.

If the applicant should decide to appeal, the applicant must, *in terms of*, regulation 60(1), lodge a notice of intention to appeal with the Minister, within 20 (twenty) days after the date of the decision, and must within 10 (ten) days of having submitted the notice contemplated in regulation 60(1), provide each person and organ of State registered as an interested and affected party in respect of the application with a copy of the Notice of Intention to Appeal; a notice indicating where and for what period the appeal submission will be made available for inspection by such person or organ of State on the day of lodging it with the Minister, and indicate that a responding statement may be made on the appeal within 30 (thirty)days from the date the appeal submission was lodged with the Minister.

A person, organ of state or applicant who submits a responding statement in terms of regulation 63(1) must within 10 (ten) days of having submitted the responding statement, serve a copy of the statement on the appellant.

If the applicant should decide to appeal, the applicant must submit the appeal within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1), for the lodging of the notice of intention to appeal.

Should any other person, or an interested and affected party, decide to appeal, they must, in terms of, regulation 60(1), lodge a notice of intention to appeal with the Minister, within 20 (twenty) days

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after the date of the decision. An appeal must be submitted within 30 (thirty) days after the lapsing of the 20 (twenty) days contemplated in regulation 60(1).

The appellant must provide the applicant, within 10 days of having lodged the notice contemplated in regulation 60(1), with a copy of the notice referred to in regulation 60(1), and a notice indicating where and for what period the appeal submission will be available for inspection by the applicant. A responding statement may be made on the appeal within 30 (thirty) days from the date the appeal submission was lodged with the Minister.
The prescribed Notice of Intention to Appeal form and Appeal form are obtainable from the Minister's office, as well as assistance regarding the appeal processes, at telephone number (021) 483 3721, or 483 3915, email jedevill@pgwc.gov.za or via the URL http://www.capegateway.gov.za/eadp.

All Notice of Intention to Appeal and Appeal forms must be submitted by means of one of the following methods:

By post: Western Cape Minister of Local Government, Environmental Affairs and Development Planning
Private Bag X9186
Cape Town
8000

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Jaap de Villiers
09th floor Utilitas Building
1 Dorp Street
Cape Town
8001

A prescribed Notice of Intent to Appeal form and Appeal form is obtainable from the Minister's office at tel (021) 483 3721, email jedevill@pgwc.gov.za or URL http://www.capegateway.gov.za/eadp.

Provincial Government, Local Authority or committees appointed in terms of the conditions of the application or any other public authority or organisation shall not be held responsible for any damages or losses suffered by the developer or his successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the developer with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.

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

Yours faithfully

ANTHONY BARNES
DIRECTOR: INTEGRATED ENVIRONMENTAL MANAGEMENT (REGION B)
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Date of decision: 22-11-2010

CC: 1. Mr. P. Fabricius (West Coast District Municipality)
2. Mr. P. Slabbert (PHS Consulting)

Fax: (022) 713 5952
Fax: (086) 508 3249

E12/2/3/1-B4/19-0554/08

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

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
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'

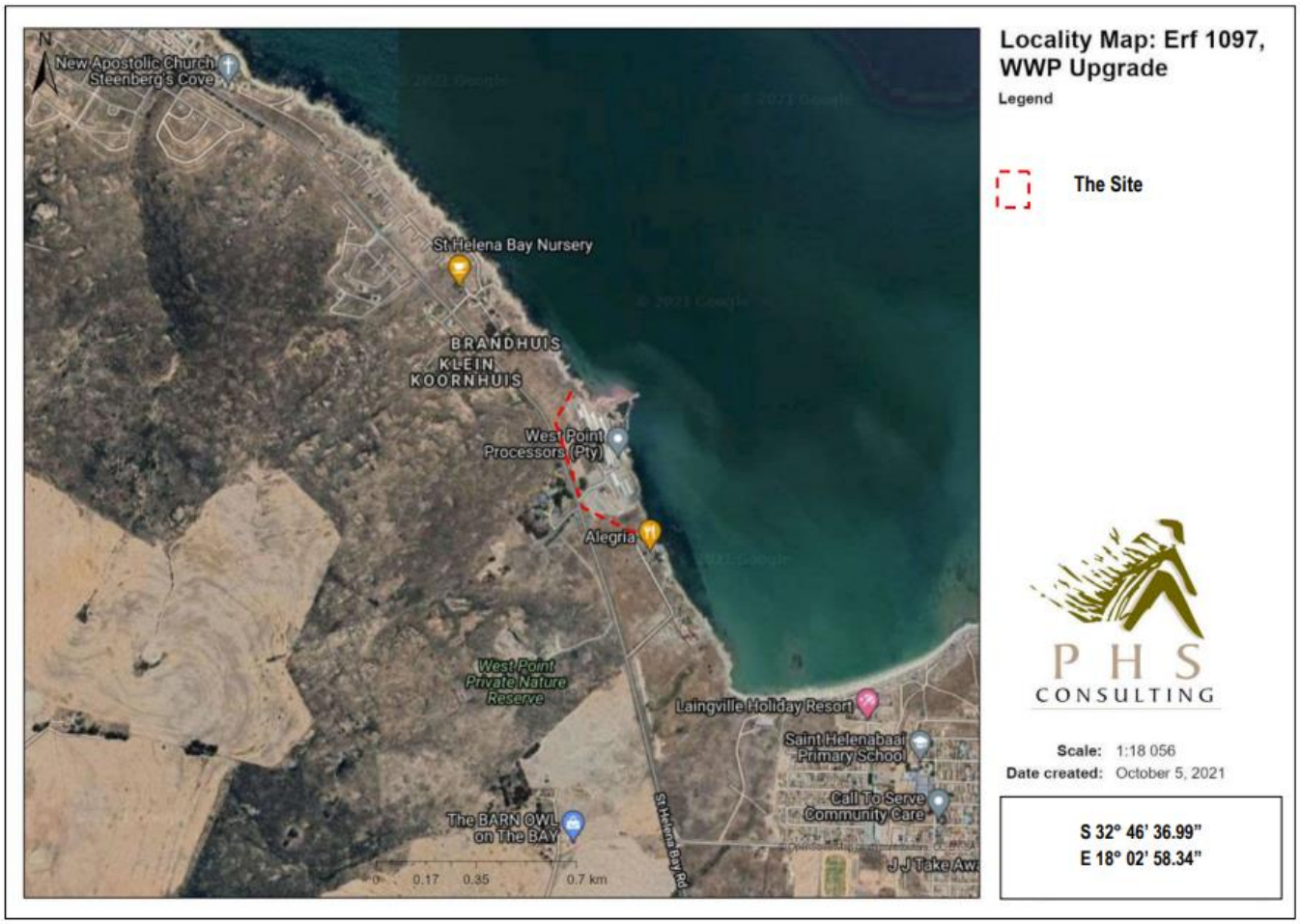
MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

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

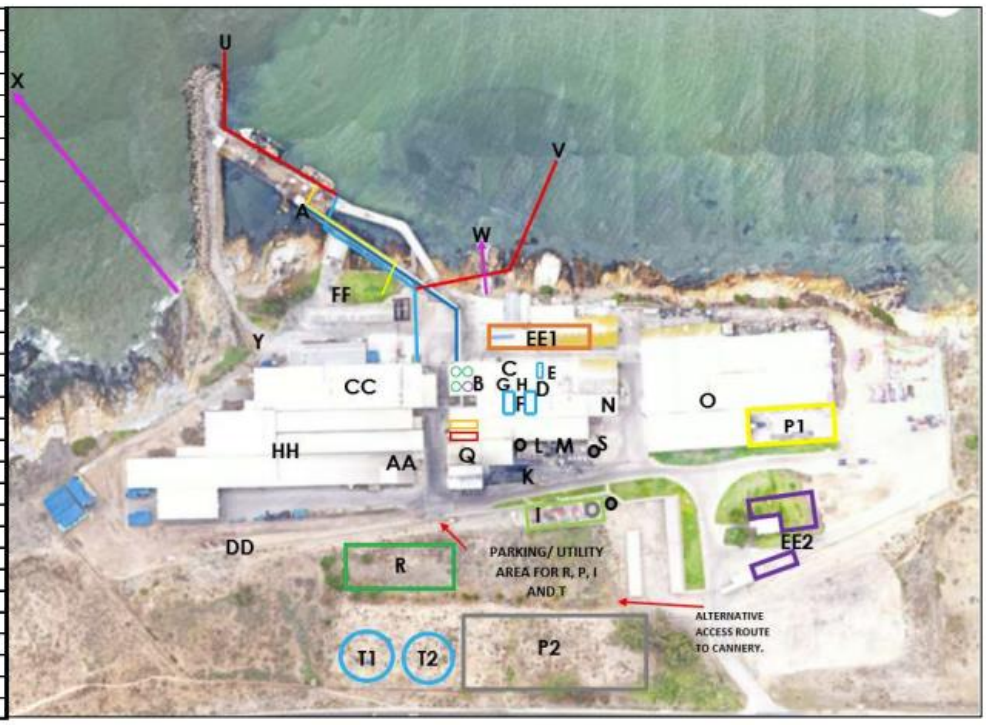
The proposed expansion is demarcated in red below.



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----------

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/F4/20/3024/22
NEAS REFERENCE NUMBER: WCP/EIA/0001106/2022
ENQUIRIES: Mr. R. Chambeau
DATE OF ISSUE: **11 NOVEMBER 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 REVERSE OSMOSIS PLANT AT 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: 2022.11.11 12:13:18 +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) Mr. R. Molale (DFFE: Oceans and Coasts) Email: Rmolale@environment.gov.za

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/F4/20/3024/22

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 REVERSE OSMOSIS PLANT AT 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 July 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
c/o Mr Martin Potgieter
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 16 Activity Description: *"The development and related operation of facilities for the desalination of water with a design capacity to produce more than 100 cubic metres of treated water per day."* 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 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."*	The proposed RO Plant will treat potable water and will have a design capacity of more than 100m^3 per day. The expansion of the existing fishmeal processing plant will result in the need for an amended Coastal Waters Discharge Permit ("CWDP") required in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008).

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 authorised development entails the installation of a Reverse Osmosis ("RO") plant and associated infrastructure at the West Point fish meal processing plant on Erf 1097, St Helena Bay.

The RO plant will be located in close proximity to a municipal water connection to tie into the "inlet" line. The municipal water supply will flow into the carbon filters and membrane units of the RO plant to remove the salts and minerals from the potable water. This would result in a more effective steam, improved energy generation within the plant and an increased efficiency of the boilers resulting, which in turn will result in the use of less coal and less chemicals being added to the fish meal process. 'Clean' water and effluent/brine will be produced by the RO plant.

The 'clean' water will be stored in storage vessels, which will feed directly into the current boiler system. The effluent/brine will flow directly into the existing facility's blow down sump and downstream effluent system. The effluent/brine will be discharged into the sea through the offshore Outfall B pipeline. Approximately 25% of the total volume of water processed by the RO plant will be discharged as effluent/brine, which equates to approximately 13 908m^3 per annum.

Outfall B pipeline will be upgraded in accordance with the Environmental Authorisation issued by this Department on 27 July 2022 (Ref. No. 16/3/3/1/F4/20/3005/22).

The RO plant will have a design capacity to treat approximately 25m^3 of potable water per hour, which amounts to approximately 55 632m^3 per annum. The RO plant will be located within the development footprint of the existing facility.

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 RO plant is:

Middle point	32° 46'36.19" South	18° 02'57.63" 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: paul@phsconsulting.co.za / 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 July 2022 on the site described in Section C above.

2. The holder must commence with the listed activities on the site within a period of **five (5) years** from the date of issue of this Environmental Authorisation.

3. The development must be concluded within **ten (10)** years from the date of commencement of the listed activities.

4. 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.

5. 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

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

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

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

    Conditions: 6, 7 and 11.

Notification and administration of appeal

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

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

        7.1.1. the outcome of the application;
        7.1.2. the reasons for the decision as included in Annexure 3;
        7.1.3. the date of the decision; and
        7.1.4. the date when the decision was issued.

    7.2. 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;

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

    7.4. Provide the registered I&APs with:

        7.4.1. name of the holder (entity) of this Environmental Authorisation,
        7.4.2. name of the responsible person for this Environmental Authorisation,
        7.4.3. postal address of the holder,
        7.4.4. telephonic and fax details of the holder,
        7.4.5. 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).

8. 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

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

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

Monitoring

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

12. 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.

13. 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

14. 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).

    14.1. The holder must undertake an environmental audit within three (3) 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.

    14.2. A second Environmental Audit Report must be submitted to the Competent Authority within one (1) month of the completion of the construction activities.

    14.3. Thereafter, an Environmental Audit Report must be submitted to the Competent Authority every five (5) years after the commencement of the operational phase.

    14.4. 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

15. Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. 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: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.

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. The recommendations of the Marine Specialist Study and Dispersion Modelling for the proposed operation of a desalination plant (compiled by Anchor Environmental Consultants and dated 2022), as included in the EMPr, must be implemented.

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

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: 2022.11.11 12:13:42 +02'00'

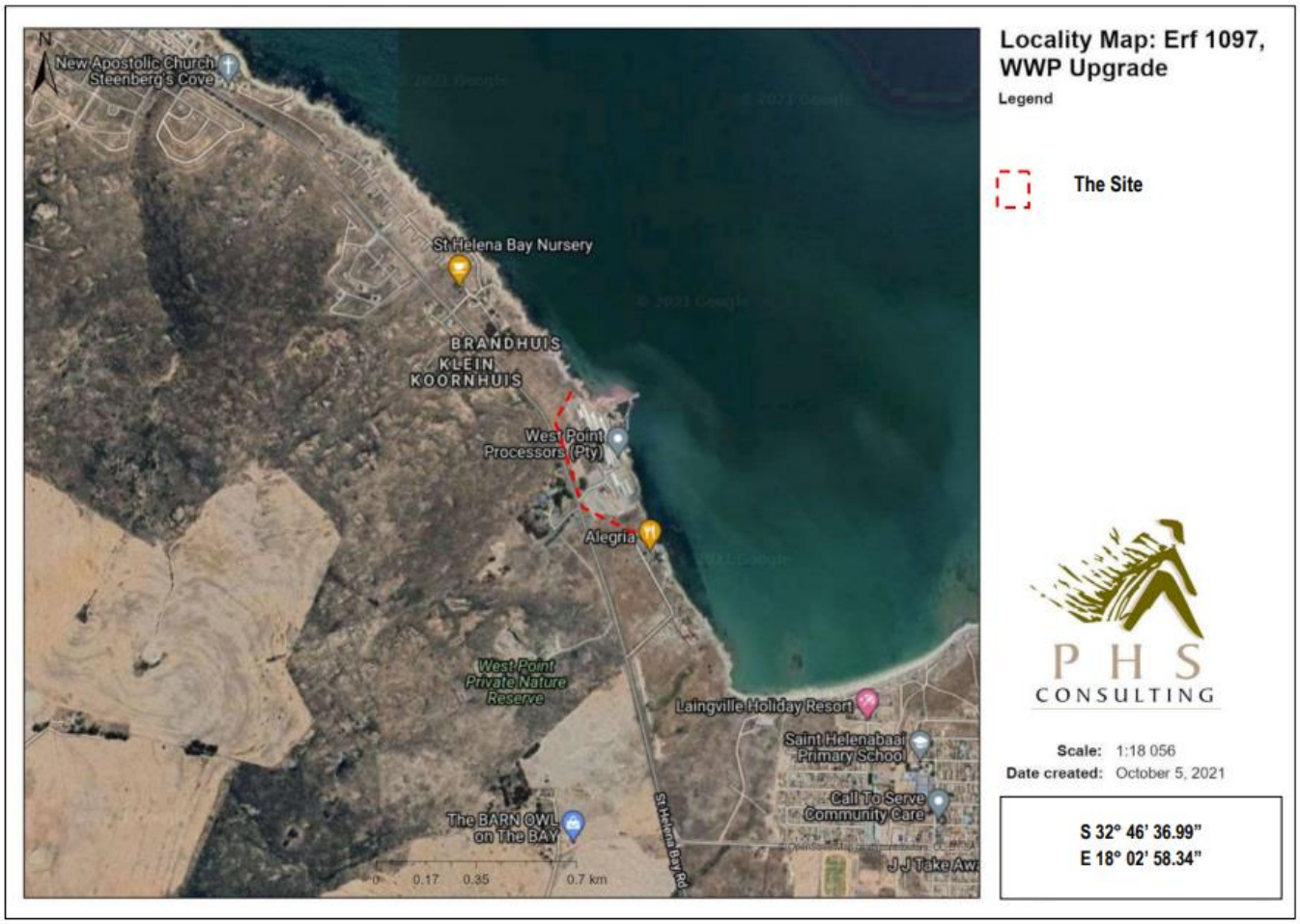
MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

DATE OF DECISION: 11 NOVEMBER 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) Mr. R. Molale (DFFE: Oceans and Coasts) Email: Rmolale@environment.gov.za

ANNEXURE 1: LOCALITY MAP

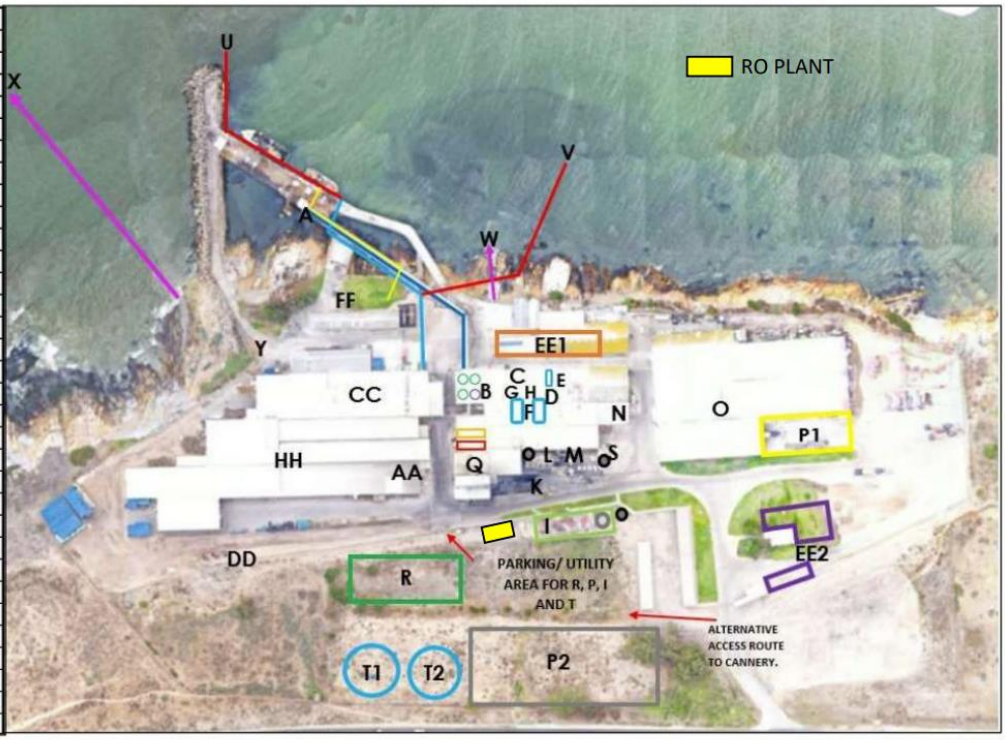
The subject property is demarcated in red below.



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 23 May 2022 and received by the competent authority on 30 May 2022, the BAR dated July 2022 and received by the competent authority on 25 July 2022 and the EMPr (dated July 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 July 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 application process 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 17 June 2022;
- Giving written notice to the 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 14 June 2022;
- The placing of a newspaper advertisement in the "*Weslander*" on 16 June 2022;
- The Draft BAR document was available on the EAP's company website www.phsconsulting.co.za for review.
- Making the draft BAR available to I&APs for comment from 20 June 2022 to 20 July 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

The proposed site is owned by the applicant and the intended purpose of the proposed development is to improve the efficiency of the existing Fish Processing Plant. Therefore, no site alternatives were identified and assessed. Layout Alternatives with respect to storage vessels for the storage of the 'clean' water was identified and assessed. However, the potential impacts related to the storage vessels remain the same for both layout alternatives. In terms of Operational Alternatives, the Marine Impact Assessment (compiled by Anchor Environmental and dated 2022) identified the existing Outfall A and Outfall B discharge points as potential discharge points for the effluent/brine, which will be produced by the RO Plant. However, since Outfall B will be upgraded in accordance with the Environmental Authorisation issued by this Department on 27 July 2022 (Ref. No. 16/3/3/1/F4/20/3005/22) only Outfall B was assessed.

The Preferred Alternative the "No-Go" alternative was identified and assessed as follows:

The Preferred Alternative - herewith authorised:

The Preferred Alternative entails the installation of a Reverse Osmosis ("RO") plant and associated infrastructure at the West Point fish meal processing plant on Erf 1097, St Helena Bay.

The RO plant will be located in close proximity to a municipal water connection to tie into the "inlet" line. The municipal water supply will flow into the carbon filters and membrane units of the RO plant to remove the salts and minerals from the potable water. This would result in a more effective steam, improved energy generation within the plant and an increased efficiency of the boilers resulting, which in turn will result in the use of less coal and less chemicals being added to the fish meal process. 'Clean' water and effluent/brine will be produced by the RO plant. The 'clean' water will be stored in storage vessels, which will feed directly into the current boiler system. The effluent/brine will flow directly into the existing facility's blow down sump and downstream effluent system. The effluent/brine will be discharged into the sea through the offshore Outfall B pipeline. Approximately 25% of the total volume of water processed by the RO plant will be discharged as effluent/brine, which equates to approximately 13 908m^3 per annum.

Outfall B pipeline will be upgraded in accordance with the Environmental Authorisation issued by this Department on 27 July 2022 (Ref. No. 16/3/3/1/F4/20/3005/22).

The RO plant will have a design capacity to treat approximately 25m^3 of potable water per hour, which amounts to approximately 55 632m^3 per annum. The RO plant will be located within the development footprint of the existing facility.

The Preferred Alternative take cognisance of the requirements of the Marine Impact Assessment (compiled by Anchor Environmental and dated 2022) and optimises the use of the property to improve the efficiency of the existing facility.

"No-Go" Alternative

The "No-Go" alternative would result in maintaining the "status quo" of the existing facility. Although the existing facility can continue to operate in its exiting status, the operational efficiency of the existing facility will remain unchanged. Since the Preferred Alternative will not result in unacceptable environmental impacts, the "No-Go" alternative was not warranted.

3. Impact Assessment and Mitigation measures

3.1. Activity Need and Desirability

The proposed site contains an existing fishmeal processing plant, which has been in existence since 1948. The proposed is zoned for Industrial use (Fishing Industry Zone). The proposed development is in keeping with the activities being undertaken within the site and in accordance with the existing land use rights of the property. The proposed development is in line with the relevant planning policies applicable to the area. The purpose of treating municipal/potable water supply is to remove salts and minerals from the potable water supply. The treated water would result in a more effective steam energy generation within the existing plant and increase the efficiency of the boilers. This is anticipated to result in the use of less coal and chemicals in the processing plant.

3.2. Marine impacts

A Marine Specialist Study and Dispersion Modelling for the proposed operation of a desalination plant (compiled by Anchor Environmental Consultants and dated 2022) was undertaken to assess the potential impacts associated with the discharge of effluent/brine emanating from the RO plant. The specialist noted that the existing facility currently discharges effluent through two separate shore outfalls, namely Outfall A and Outfall B.

Based on the current discharge volumes of both outfalls, it was proposed that the effluent/brine emanating from the RO plant be discharged via the Outfall B pipeline in combination with the fish processing effluent. The specialist indicated that should the existing effluent stream be combined with the effluent/brine of the RO plant and discharge through Outfall B, the combined effluent will not meet the Water Quality Guidelines for Total Suspended Solids in the 100m and 300m Recommended Mixing Zones.

The specialist took cognisance of the planned upgrade to the existing facility and the Outfall B expansion in terms of the issued by this Department on 27 July 2022 (Ref. No. 16/3/3/1/F4/20/3005/22). Based on the proposed upgrade to the Outfall B pipeline, the dispersion modelling indicated that the combined effluent would meet the requirements of the Water Quality Guideline limits for salinity and temperature at the 100m Recommended Mixing Zone.

However, the dispersion modelling further indicated that the combined effluent will not meet the Water Quality Guideline limits for Total Suspended Solids at either the 100m or the 300m Recommended Mixing Zones once ambient concentrations are taken into account. To reduce the Total Suspended Solids, the treatment of the effluent onshore and reduce the overall loading entering the system has been recommended by the specialist.

Mitigation measures have been recommended by the specialist to reduce the potential impacts on the marine environment as a result of the proposed RO plant. The mitigation measures have been included as a condition in this Environmental Authorisation and in the EMPr. In addition, the requirements of the National Environmental Coastal Management Act, 2008 (Act No. 24 of 2008) will be met as the existing Coastal Waters Discharge Permit for the existing facility will be amended accordingly.

3.3. Biodiversity Impacts

Since the proposed RO plant will occur within the development footprint existing facility, no indigenous vegetation will be cleared. No wetlands or watercourses are located on the proposed site. Although the proposed site is mapped as part of a Private Nature Reserve, the proposed site is not considered as Protected Area since the proposed site is zoned Fishing Industry and does not form part of the Private Nature Reserve.

Cape Nature indicated (in an electronic mail correspondence dated 20 July 2022), that the conclusions of the site sensitivity verification report regarding plant, aquatic, animal and terrestrial biodiversity sensitivities are accepted.

3.5. Noise and Dust Impacts

Potential noise and dust impacts are anticipated during the development phase. The potential noise impacts are anticipated to be insignificant with mitigation. Mitigation measures to reduce the potential noise impacts have been included in the EMPr.

3.6. Services

No additional municipal services (i.e. potable water supply, sewerage treatment and disposal and solid waste disposal) will be required to service the proposed RO plant. In addition, the additional electricity required for the RO plant is deemed insignificant. Eskom has confirmed electrical supply (in correspondence dated 30 November 2021).

The development will result in both negative and positive impacts.

Negative Impacts include:

- Potential disturbance to the marine environment; and
- Potential construction related impacts in terms of dust and noise impacts.

Positive impacts include:

- Improved efficiency to the existing facility;
- The use of less coal and chemical additions to the existing processes;
- Improved combined effluent dilution potential from the Outfall B 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----------

Western Cape Government

Department of Environmental Affairs and Development Planning
Kraigen Govindasamy
Development Management (Region 1)
Kraigen.Govindasamy@westerncape.gov.za | Tel: 021 483 2804

EIA REFERENCE NUMBER: 16/3/3/5/F4/20/3027/25
NEAS REFERENCE NUMBER: WCP/EIA/AMEND/0000957/2025
DATE OF ISSUE: 08 JULY 2025

The Director
West Point Processors (Pty) Ltd.
P.O. Box 15
ST HELENA BAY
7590

For Attention: Mr. M. Potgieter

Tel: (022) 736 1100
Email: marthin@saldanha.co.za

Dear Sir

APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) FOR THE PART 1 AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ISSUED BY THIS DEPARTMENT ON 22 NOVEMBER 2010 (REF. NO. E12/2/3/1-F4/19-0554/08) FOR THE UPGRADE OF THE WEST POINT FISH PROCESSING PLANT ON PORTION 3 OF ERF 1097, ST HELENA BAY.

1. With reference to the above application, the Department hereby notifies you of its decision to **grant** an amendment of the Environmental Authorisation, attached herewith, 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, 2025, which prescribes the appeal procedure to be followed. This procedure is summarised in the amended Environmental Authorisation below.

Yours faithfully

Zaahir Toefy
Digitally signed by Zaahir Toefy
Date: 2025.07.08 11:02:20 +02'00'

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

Copies to: (1) Mr. P. Slabbert/ Ms. J Theron (PHS Consulting) Email: jt@phsconsulting.co.za
(2) Ms. C. Ganten-Bein (West Coast District Municipality) Email: cgbein@wcdm.co.za
(3) Ms. N. Duarte (Saldanha Bay Municipality) Email: Nazeema.duarte@sbm.gov.za

Western Cape Government

Department of Environmental Affairs and Development Planning
Kraigen Govindasamy
Development Management (Region 1)
Kraigen.Govindasamy@westerncape.gov.za | Tel: 021 483 2804

EIA REFERENCE NUMBER: 16/3/3/5/F4/20/3027/25

AMENDED ENVIRONMENTAL AUTHORISATION

APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) FOR THE PART 1 AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION ISSUED BY THIS DEPARTMENT ON 22 NOVEMBER 2010 (REF. NO. E12/2/3/1-F4/19-0554/08) FOR THE UPGRADE OF THE WEST POINT FISH PROCESSING PLANT ON PORTION 3 OF ERF 1097, ST HELENA BAY.

With reference to your application, find below the amendment to the Environmental Authorisation in respect of this application.

A. BACKGROUND

1. An Environmental Authorisation ("EA") was issued by this Department on 22 November 2010 for the proposed upgrade of the West Point Fish Processing Plant on Portion 3 of Erf 1097, St Helena Bay (Ref. No. E12/2/3/1-F4/19-0554/08).

2. An amended EA was issued by this Department on 07 July 2016 to revise the project description (Ref. No. 16/3/3/5/F4/20/3035/16).

3. An amendment application was received by this Department via electronic mail correspondence on 05 June 2025. Based on the information contained in the application for amendment of the EA (Ref. No. E12/2/3/1-F4/19-0554/08), the proposed amendment entails the inclusion of fish material (off-cuts and trimmings) from frozen or fresh demersal fish into the existing processes.

B. 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 Department hereby **grants** the amendment to the Environmental Authorisation ("EA") issued by this Department on 22 November 2010 (Ref. No. E12/2/3/1-F4/19-0554/08) in terms of Part 1 of the EIA Regulations, 2014 (as amended). The EA (Ref. No. E12/2/3/1-F4/19-0554/08) (attached as Appendix A) is amended as set out below:

1. All reference to "*pelagic fish*" **is herewith replaced with** "*pelagic fish and/or demersal fish*".

C. REASONS FOR THE DECISION:

In reaching its decision, the Department took, inter alia, the following into consideration:

1. The information contained in the application for the amendment dated and received by this Department on 05 June 2025.

2. The application for an amendment to the EA (Ref. No. E12/2/3/1-F4/19-0554/08) is considered as a Part 1 amendment in terms of the EIA Regulations, 2014 (as amended) due to the following:

   2.1. Although the scope of the EA (Ref. No. E12/2/3/1-F4/19-0554/08) will change, the proposed amendment will not result in an increased level or change in the nature of impact.

   2.2. The input provided by DDA Environmental Engineers (air quality specialist) dated 13 March 2025 indicated that introduction of this fish material to the processing facility will not increase the plant's capacity, and the facility will operate within the approved capacity range.

   2.3. The EA (Ref. No. E12/2/3/1-F4/19-0554/08) is still similarly listed in terms of the EIA Regulations, 2014 (as amended), as follows:

      2.3.1. Activities 3, 19(A), 38 and 55 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended).

   2.4. The introduction of this fish material to the existing processing facility will not increase the existing plant throughput capacity or the developed footprint.

3. The environment and the rights and interests of interested and affected parties are not likely to be adversely affected by this decision.

4. All other conditions contained in the EA (Ref. No. E12/2/3/1-F4/19-0554/08) remain unchanged and in force.

D. CONDITIONS

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

   1.1. Notify all registered interested and affected parties ("I&APs") of –

      1.1.1. the outcome of the application;
      1.1.2. the reasons for the decision as included in Section B;
      1.1.3. the date of the decision; and
      1.1.4. the date when the decision was issued.

   1.2. 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, 2025 detailed in Section D below;

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

   1.4. Provide the registered I&APs with:

      1.4.1. the name of the holder (entity) of this Environmental Authorisation;
      1.4.2. name of the responsible person for this Environmental Authorisation;
      1.4.3. postal address of the holder;
      1.4.4. telephonic and fax details of the holder;
      1.4.5. e-mail address, if any, of the holder; and
      1.4.6. 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, 2025.

E. APPEALS

Appeals must comply the National Appeal Regulations, 2025 (Government Notice No. R. 5985 in Government Gazette No. 52269 of 13 March 2025. Please note the provisions of Regulation 1(2) & (3) of the National Appeal Regulations, 2025 when calculating the period of days.

1. The holder (applicant) of this decision must submit an appeal to the Appeal Administrator, any registered Interested and Affected Parties (I&AP's) and the decision maker (Competent Authority who issued the decision) within **20 calendar** days from the date this decision was sent by the decision maker.

2. The I&AP's (not the holder of this decision) must submit an appeal to the Appeal Administrator, the holder (applicant) of the decision and the decision maker within **20 calendar days** from the date this decision was sent to the registered I&AP's by the holder (applicant) of the decision.

3. All appeals submitted must:

   a. be in writing in the appeal form obtainable from the Departmental website;

   b. include supporting documents referred to in the appeal; and

   c. include proof of payment of the prescribed non-refundable appeal fee, if prescribed.

4. The holder (applicant) of the decision must:

   a. notify registered I&AP's and affected organs of state of any appeal received, and make the appeal available to them, within **5 calendar days** after the 20-day appeal period ends.

   b. notify registered I&AP's and affected organs of state of any appeal received, and make the appeal available to them, within 5 calendar days after the 20-day appeal period ends.

5. The applicant, where applicable, the decision-maker, or any person notified under regulation 4 of the National Appeal Regulations, 2025 may submit a Responding Statement within **20 calendar days** from the date they received the appeal, in the form obtainable from the Department website to the Appeal Administrator and to the appellant, where the appellant is not the applicant

6. Appeals, Responding Statements and supporting documents must be submitted to the Appeal Administrator by means of one of the following methods:
   a. **By e-mail**:
   DEADP.Appeals@westerncape.gov.za or

   b. **By hand** where that person submitting does not hold an electronic mail account:
   Attention: Mr Marius Venter
   Room 809, 8th Floor Utilitas Building,
   1 Dorp Street, Cape Town, 8001

   Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Administrator via email or to the address listed above.

   A prescribed appeal form, responding statement form as well as assistance regarding the appeal processes is obtainable from the relevant website of the appeal authority: http://www.westerncape.gov.za/eadp or the office of the Minister at: Tel. (021) 483 3721 or email DEADP.Appeals@westerncape.gov.za.

F. DISCLAIMER

The Western Cape Government, the Local Authority, 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 environment is greatly appreciated.

Yours faithfully

Zaahir Toefy

Digitally signed by Zaahir Toefy
Date: 2025.07.08 12:43:11 +02'00'

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

DATE OF DECISION: 08 JULY 2025

Copies to: (1) Mr. P. Slabbert/ Ms. J Theron (PHS Consulting) Email: jt@phsconsulting.co.za
(2) Ms. C. Ganten-Bein (West Coast District Municipality) Email: cgbein@wcdm.co.za
(3) Ms. N. Duarte (Saldanha Bay Municipality) Email: Nazeema.duarte@sbm.gov.za

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

APPENDIX A

A copy of the Environmental Authorisation issued by this Department on 22 November 2010 (Ref. No. E12/2/3/1-F4/19-0554/08).

APPENDIX B

A copy of the amended Environmental Authorisation issued by this Department on 07 July 2016 (Ref. No. E12/2/3/1-F4/19-0554/08).

forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

COASTAL WATERS DISCHARGE PERMIT ISSUED TO WEST POINT PROCESSORS (PTY) LTD IN RESPECT OF ITS FISH PROCESSING FACTORY IN TERMS OF SECTION 69(1) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: INTEGRATED COASTAL MANAGEMENT ACT, 2008 (ACT NO. 24 OF 2008) READ WITH REGULATION 8(2) OF THE COASTAL WATERS DISCHARGE PERMIT REGULATIONS, 2019 PUBLISHED IN GOVERNMENT NOTICE 382 IN *GOVERNMENT GAZETTE* 42304 OF 15 MARCH 2019 - PERMIT REFERENCE NUMBER: 2014/021 /WC/WEST POINT PROCESSORS

DECISION

Permission is hereby granted in terms of section 69(1) of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act 24 of 2008) (ICM Act) read with regulation 8(2) the Coastal Waters Discharge Permit Regulations published in Government Notice 382 in Government Gazette 42304 on 15 March 2019 (CWDP Regulations) to **West Point Food Processors (Pty) Ltd** for the discharge of effluent into coastal waters on terms and conditions set out in this permit. This permit does not exempt the permit holder from complying with any other applicable legislation.

Mr. Potlako Khati
Acting Chief Director: Integrated Coastal Management (Delegated Authority)
Department of Forestry, Fisheries and the Environment
Date: 28 February 2025

For office use only	
Date of issue	3 March 2025

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SECTION A: PERMIT HOLDER'S DETAILS

Permit Holder	:	West Point Processors (Pty) Ltd
Company Registration Number	:	1990/07321/07
Address	:	Private Bag X 15, St Helena Bay, 7390
Contact Person	:	Gabriel Marthinus
Designation	:	Safety, Health and Environmental Manager
Telephone	:	(022) 736 1100
Fax	:	(022) 736 1282
E-mail	:	gabriel@saldanha.co.za

SECTION B: ACTIVITY DETAILS

Effluent Classification	:	Cooling Water and Fish processing Effluent
BEFORE THE UPGRADE		
Maximum daily discharge volume (Pipeline A)	:	18 000 m^3 (Cooling effluent)
Maximum daily discharge volume (Pipeline B)	:	8 000 m^3 (Fish Processing effluent)
Co-ordinates of Discharge Point (Pipeline A)	:	32º 46'34.98"S and 18º 03'01.98"E .
Co-ordinates of Discharge Point (Pipeline B)	:	32º 46'29.99"S and 18º 02'58.47"E
AFTER THE UPGRADE		
Maximum daily discharge volume (Pipeline A)	:	54 000 m^3 (Cooling effluent)
Maximum daily discharge volume (Pipeline B)	:	16 000 m^3 (Fish Processing effluent)
Location of Discharge (Pipeline A)	:	Surf zone (10m from the shore) ~2 m deep
Location of Discharge (Pipeline B)	:	Offshore (500m) ~-5.8 m deep
Co-ordinates of Discharge Point (Pipeline A)	:	32º 46.563'S and 18º 3.052"E .
Co-ordinates of Discharge Point (Pipeline B)	:	32º 46.262'S and 18º 3.108"E .

SECTION C: DESCRIPTION OF THE PROCESS, LOCATION OF SITE AND DISCHARGE LOCATION

1. West Point Processors (Pty) Ltd is a fish processing factory located on Erf 1097 within St Helena Bay in the Western Cape.
2. The effluent generated from the factory consists of cooling water and fish processing water, discharged via two outfalls namely Pipeline A and Pipeline B respectively.
3. Before the upgrade the maximum volume of 18 000 m^3 of cooling effluent may be discharge via Pipeline A and a maximum volume of 8 000 m^3 of fish processing effluent may be discharged via Pipeline B.

4. **<u>After the upgrade:</u>**

4.1 <u>Cooling effluent (Pipeline A)</u>

a. Pipeline A may discharge a maximum volume of 54 000 m^3 of effluent per day. It will be collected from the condensation and chemical scrubbers and discharge 10 m from the shore at depth of ~2 m.

b. The condensation scrubber uses seawater to spray over the fish meal processing vapour in the equipment to cool down the temperature of the vapour from 80^0 C to less than 45^0 C. The scrubber also assists to trap the odour.

c. The chemical scrubber will use fresh water to oxidise the remainder of non-condensable in the scrubber.

4.2 <u>Fish Processing effluent (Pipeline B)</u>

a. Pipeline B may discharge a maximum volume of 16 000 m^3 per day of fish processing effluent at the discharge location ~500 m offshore at ~5.8 m depth.

b. Sea water and fresh water will be used to transport fish onto cutting tables within the factory as well as for cleaning equipment after production.

c. The effluent will pass through a rotatory screen filter of 500 microns to remove solids from the effluent before it is discharged offshore through a 25 m staged diffuser (three ports).



Figure 1: Aerial view of the two discharge points (Pipelines A and B) Before upgrade of the pipelines



Figure 2: Aerial view of the two discharge points (Pipelines A and B) (***After the upgrade of the Pipelines)***

SECTION D: GENERAL CONDITIONS

1. In this permit, a reference to the permit holder includes the entity; its directors; employees (whether permanent, full-time or part-time); and its contractors, agents, and advisers acting in the course and scope of their employment/contractual relationship.

2. This permit may not be transferred or assigned to any other person or organisation, except with prior written permission from this Department.
3. In accordance with section 74(4) of the ICM Act, an appeal against this permit does not suspend the permit, unless directed otherwise by the Minister.
4. The permit holder is liable for the annual fee if prescribed by the Minister in the Government Gazette from time to time, as contemplated in section 83 (2) and (3) of the ICM Act, for the purpose of covering the cost to the Department of monitoring compliance with permit conditions.
5. The permit holder must grant access to the facility to any authorised official representing the Department who requests access for the purposes of assessing and/ or monitoring compliance with the conditions of this permit, including to collect samples, at any reasonable time during the validity of this permit.
6. A copy of this permit must be kept at the site and must be produced to any authorised official representing the Department upon request and any employee or agent of the permit holder who works or undertakes work at the site.
7. In accordance with section 68 of the ICM Act, the Department reserves the right to revoke, cancel, suspend or amend this permit, if –
   - 7.1 the holder of the permit contravenes or fails to comply with a condition of this permit;
   - 7.2 the permitted use conflicts with a relevant coastal management programme or will significantly prejudice the attainment of a relevant coastal management objective;
   - 7.3 changes in circumstances require such revocation, suspension, cancellation, or amendment of the permit. These circumstances include, *inter alia*, where such action is necessary or desirable to prevent deterioration or further deterioration of, or adverse effect on, the coastal environment and/ or if it is in the interest of the whole community; or
   - 7.4 it is necessary to meet the Republic's international obligations.
8. The permit holder must ensure compliance with the provisions of the duty of care stipulated in section 58 of the ICM Act read with section 28 of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA).
9. Non-compliance with the conditions of this permit is an offence, and may, in addition to criminal prosecution, result in the issuance of a coastal protection notice. In addition, it may be taken into consideration if and when a renewal application is submitted.
10. All reports and correspondence required to be sent to the Department relating to this permit must be submitted to: The Deputy-Director General: Oceans and Coasts, Department of Forestry, Fisheries and the Environment for the attention of: The Director: Coastal Pollution Management either by hand to: 2 East Pier Building, East Pier Road, V&A Waterfront, Cape Town, 8012 or electronically to: cwdp@dffe.gov.za and copy Mr Rueben Molale (E-mail: rmolale@dffe.gov.za), Ms Tandiswa Jacobs (E-mail: tjacobs@dffe.gov.za) and Mr Bongumenzi Gumbi (E-mail: bgumbi@dffe.gov.za quoting reference (2014/021/WC/West Point Processors) in all correspondence.

SECTION E: SPECIFIC CONDITIONS

1. EFFLUENT QUANTITY

1.1 The permit holder must not exceed the maximum daily effluent discharge volumes as stipulated in Section C of this permit.

2. EFFLUENT QUALITY

2.1 No material other than the effluent and its constituents authorised by this permit may be discharged into the coastal environment from the discharge Location.

2.2 The specific maximum limits prescribed in **Table 1 and Table 2** for the listed constituents of the effluent must not be exceeded in the discharge through the outfall.

2.3 The below effluent limits in Table 2 are interim limits which will endure for two and a half years calculated from the date of issue of this permit affording West Point Food Processors time to implement the improvement plan (Section E: Condition 4) to meet the 100m radius mixing zone. Within two and a half years of date of issuance of this permit, the permit holder must have implemented measures necessary to ensure that water quality limits are met outside of the 100m radius mixing zone.

2.4 The permit holder must conduct weekly E.coli analysis of the intake water and effluent before discharge. The results must be reported to the Department on a monthly basis and may inform future amendments to the permit, including to the effluent quality parameters.

Table 1: Effluent emission limits for parameters in the final effluent prior to discharge into the coastal environment from Pipeline A

PARAMETER	LIMITS	FREQUENCY
pH	5.5 - 9.5	In situ/Weekly
Temperature (ºC)	32	In situ/Weekly
Salinity	35	In situ/Weekly

Table 2: Effluent emission limits for parameters in the final effluent prior to discharge into the coastal environment from Pipeline B

PARAMETER	INTERIM LIMITS	AFTER 2.5 YEARS	FREQUENCY
pH	6.0 - 8.0	5.5 -9.5 or *as otherwise determined by the Delegated Authority post receipt of the Environmental Monitoring Survey Report*	In situ/Weekly
Temperature (ºC)	25	25 or as otherwise determined by the Delegated Authority post receipt of the Environmental Monitoring Survey Report	In situ/Weekly
Salinity	36	36 or *as otherwise determined by the Delegated Authority post receipt of the Environmental Monitoring Survey Report*	In situ/Weekly
Fat, Oil and Grease (mg/l)	1528	31 or *as otherwise determined by the Delegated Authority post receipt of the Environmental Monitoring Survey Report*	Monthly
Total Suspended Solids (mg/l)	2716	230 or *as otherwise determined by the Delegated Authority post receipt of the Environmental*	Monthly

		Monitoring Survey Report	
Chemical Oxygen Demand (mg/l)	8491	150 or *as otherwise determined by the Delegated Authority post receipt of the Environmental Monitoring Survey Report*	Monthly
Total ammonia (NH4+NH3) (mg/l)	132	100 or *as otherwise determined by the Delegated Authority post receipt of the Environmental Monitoring Survey Report*	Monthly

3. MONITORING REQUIREMENTS

3.1 Compliance with monitoring requirements

3.1.1 The Department reserves the right to instruct the permit holder to modify any monitoring programme or to implement any supplementary monitoring if the Department suspects that the monitoring programme implemented by the permit holder:

3.1.1.1 does not meet the requirements of this permit,

3.1.1.2 does not meet the environmental objectives for the receiving environment, and/ or

3.1.1.3 does not provide adequate information on which to determine the effects of the effluent on the receiving environment.

3.2 Effluent quantity (flow) monitoring

3.2.1 The quantity of effluent discharged must be continuously metered and recorded with pump capacity records.

3.2.2 Subject to condition 3.2.4 below, device calibration must be completed by a competent person at intervals prescribed in the equipment's operation manual with the first calibration to be done on issuance of this permit.

3.2.3 Records of such calibration are to be kept on site and provided upon request of an authorised official of the Department.

3.2.4 The recording equipment must be maintained in a sound state of repair and additional calibration must be effected whenever repair or maintenance work on the equipment is required.

3.3 Effluent quality monitoring

3.3.1 The quality of the effluent discharged via the outfall must be monitored by taking a grab sample as per the frequency in **Table 1** and **Table 2** and analysed at a South African National Accreditation System (SANAS) accredited lab.

3.3.2 Continuous monitoring with in situ instruments for salinity, pH, and temperature must commence within three (3) months from the date of issue of this permit.

3.3.3 The date and time of submission of the grab sample as well as the monitoring point from which each sample was taken must be documented, together with the results.

4. IMPROVEMENT PLAN TO ACHIEVE THE 100 METER RADIUS MIXING ZONE

4.1 To ensure that the permit holder meets the required 100m mixing zone for the marine outfall, the following three-year action plan with semi-annual deliverables must be implemented. This plan involves stages of assessment, planning, implementation, and monitoring, with regular reporting to the Department every six months.

4.1.1 Year 1: Assessment and Planning

First 6 Months: Monitoring Programme

The permit holder must appoint a qualified independent service provider to compile a monitoring programme which as a minimum must include the following:

4.1.1.1 General information regarding the components of the monitoring programme.

4.1.1.2 Survey design including the purpose, approach used and data analysis and interpretation of the following components:

4.1.1.2.1 Effluent characterisation;

4.1.1.2.2 Whole effluent toxicity testing to understand the toxicity levels and the cumulative impact;

4.1.1.2.3 Water quality including a detailed map of the sampling stations where water quality will be monitored *in situ* and water samples collected for analysis; table detailing the suite of analyses, number of samples analysed and method detection limits;

4.1.1.2.4 Sediment (physical, organic, and inorganic chemicals monitoring) and benthic macrofauna including a detailed map of the sampling stations where sediment is collected for sediment quality and benthic macrofuna; Table detailing the suite of analyses, number of samples analysed and method detection limits;

4.1.1.2.5 Detailed appendices including:

4.1.1.2.5.1 Table with GPS coordinates of each water station sampled, water collection depths, and indicators measured *in situ* and those analysed in the laboratory;

4.1.1.2.5.2 Table detailing the suite of organic chemicals analysed in sediment;

4.1.1.2.5.3 Table with GPS coordinates of each sediment station sampled, and sediment quality indicators analysed in the laboratory.

4.1.1.2.6 Assessment of compliance with the environmental quality limits at the end of the mixing zone and validation of the numerical modelling results.

4.1.1.2.7 Assessment of historical baseline data to determine the potential long-term impacts resulting from the effluent discharge on the receiving environment.

4.1.1.2.8 Monitoring of trends and changes in the receiving environment related to the ecological health of important ecosystems and designated beneficial uses.

4.1.1.3 Once approved by the Department, the environmental monitoring programme must immediately be implemented. Thereafter, annual environmental monitoring must be conducted, preferably during the same season and month.

4.1.1.4 Analytical results must be compared against the South African Water Quality Guidelines for Coastal Marine Waters **Volume 1 -** Natural Environment, Department of Water Affairs and Forestry (DWAF) 1995 and **Volume 2 -** Recreation, Department of Environmental Affairs (DEA) 2012 or any amended/updated version thereof.

4.1.2 First 6 Months: **Extend Pipeline B to be 500m**

Action: Execute construction activities to extend Pipeline B to be 500m from the shoreline.

Objective: Extend the Pipeline B to be 500m to improve dilution and reduce the footprint of the pollution footprint.

4.1.3 **Second 6 Months: Post-Construction Monitoring**

Action: Conduct comprehensive post-construction monitoring.

Objective: Understand current effluent quality, discharge rates, and extend of the mixing zone.

Deliverables: Marine Survey Report: Includes effluent characteristics, receiving water quality, and current mixing zone.

Report to Department: Submit the Marine Survey Report.

Next step: If the report indicate that the mixing zone is bigger than 100m radius, the below plan must be implemented.

4.1.4 Year 2: Planning Design and Implementation

First 6 Months: Feasibility Studies

Action: Do preliminary feasibility studies to investigate potential modifications and or upgrades needed to ensure the desirable mixing zone is achieved.

Deliverable: Feasibility report with recommendations for potential modifications or upgrades to equipment and/or processes to meet the mixing zone.

Report to Department: Preliminary Feasibility Report.

4.1.5 Second 6 Months: Detailed Design and Engineering

Action: Develop detailed engineering designs based on feasibility study outcomes.

Objective: Prepare for implementation of required modifications.

Deliverables: Status update on the detailed Design Plans and Engineering Drawings.

Report to the Department: Status report on the Design Plans and Engineering Drawings

4.1.6 Year 3: Construction and Modifications

First 6 Months:

Action: Execute construction and modifications to the outfall systems.

Objective: Implement changes required to achieve the 100m radius mixing zone.

Deliverables: A comprehensive report detailing the construction and/ or modifications made

Second 6 Months: Post-Construction Monitoring and Verification

Action: Conduct comprehensive post-construction monitoring.

Objective: Understand current effluent quality, discharge rates, and verify compliance with the 100m radius mixing zone requirement.

Deliverables: Marine Survey Report: Includes effluent characteristics, receiving water quality, and current mixing zone.

Report to Department: Submit the Marine Survey Report.

5. MONITORING POINTS

5.1 The effluent samples must be collected at the sampling point at the "PBFD" (Co-ordinates are 32º 46'29.99''S and 18º 02'58.47''E).

5.2 The Department may prescribe additional monitoring points in the receiving environment, if deemed necessary.

5.3 Monitoring points may not be changed without prior notification of, and written approval by, the Department.

6. E.COLI MONITORING

6.1 The permit holder must appoint an independent specialist to do a comprehensive investigation to determine why the E.coli levels in the effluent is higher than the intake water. The investigation must determine the root cause of contamination at all stages of production; from source, fish processing, and storage within the factory.

6.2 The permit holder must maintain accurate and detailed records of all E.coli testing. These records must include the date, time, location, and results of each test and must be included in the final report required in terms of condition 6.3.

6.3 A detailed report of this investigation, including preventive measures to avoid future occurrences, must be submitted to the Department within 90 days of issuance of this permit.

6.4 The permit holder must ensure that E.coli levels meet the recreational limits at the edge of the recommended mixing zone by 2.5 years.

6.5 Within 6 months of the issuance of the permit, the permit holder must submit a contingency plan specific to E.coli contamination events to the Department for approval. This plan must outline immediate corrective actions, communication protocols with the regulatory authority and affected parties, and procedures for resuming normal operations after an E.Coli contamination event.

6.6 The plan must be reviewed and updated annually by the permit holder and then submitted to the Department for noting.

6.7 The permit holder must immediately on approval of the contingency plan referred to in paragraph 6.5, implement the contingency plan, with or without amendments required by the Department.

7. SAMPLE ANALYSIS REQUIREMENTS

7.1 All sample analysis must be carried out in accordance with methods prescribed by, and obtainable from, SANAS, in terms of the Standards Act, 1982 (Act No. 30 of 1982), unless another comparable method has been approved of, in writing, by the Department.

7.2 The permit holder must give access to any authorised official or representative of the Department undertaking audit sampling upon request.

7.3 The Department may request the method of analysis be changed depending on new technologies, requirements or needs.

8. PIPELINE INTEGRITY AND CONDITION

8.1 Once the new pipeline has been installed, the part of the pipeline above the high-water mark must be inspected on a **weekly basis** to check for any malfunctions. Records must be kept of such inspections and malfunctions must be reported.

8.2 The permit holder must conduct surveys to monitor the stability of the pipeline infrastructure as well as to assist in detecting any mechanical failure which includes a survey of the integrity of the full length of the marine outfall pipeline and associated structures every three years.

8.3 The Department reserves the right to inspect the marine outfall pipeline and associated structures and equipment independently and may appoint any person to do such an inspection.

9. MALFUNCTIONS/ABNORMAL CONDITIONS

9.1 In addition to complying with any other legislative requirements, such as for example section 30 of NEMA, all malfunctions must forthwith, or where that is not possible, within 5 (five) calendar days, be reported to the Department.

9.2 Accurate, up-to-date records of all system malfunctions resulting in the disposal of effluent not in accordance with the requirements of this permit must be kept.

9.3 The permit holder must conduct monitoring as normal during abnormal conditions as specified in this permit.

9.4 The following headings must be used for the above records, accompanied by a full explanation of all contributory circumstances and proposed/implemented mitigation measures:

9.4.1 operating errors;

9.4.2 mechanical failure (including design, installation, calibration, inspections, and maintenance);

9.4.3 environmental factors (e.g., floods, storms, lighting, etc.);

9.4.4 loss of supply services (e.g., power failure, water supply failure, etc.)

9.4.5 other causes; and

9.4.6 other relevant information.

10. CONTINGENCY PLANS

10.1 An updated Contingency Plan must be submitted to the Department within 6 months of issuing of this permit. The plan must include the following aspects:

10.1.1 Clear action plan(s) on mitigating measures to protect other users of the affected coastal environment (such as site notice boards or media releases (newspapers, radio or television) informing users (public) of the potential risks, demarcation of polluted areas, if required, notification of industrial users of seawater and marine aquaculture farms, as well as procedures to be followed in assisting with protection of such facilities against pollution), must be provided by the permit holder.

10.1.2 If an incident resulting in a discharge that exceeds the limits prescribed in this permit occurs (whether the requisite permission has been obtained from the Department or not), the permit holder must report the incident immediately to the Department, or where that is not possible, at the earliest opportunity, which must be within seven calendar days, providing full details of the:

10.1.2.1 cause of the incident

10.1.2.2 the measures taken to mitigate the incident

10.1.2.3 alternatives considered other than the discharge of effluent

10.1.2.4 the volume of effluent released

10.1.2.5 the location of the effluent released and

10.1.2.6 any other information requested by the Department after reporting the emergency.

10.2 The permit holder must, in addition to the condition above, comply with the requirements of section 30 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), where applicable.

10.3 The permit holder must ensure that the contingency plan, once approved by this Department, is immediately implemented at the facility mentioned in Section B.

11. DECOMMISSIONING

11.1 The permit holder must provide a decommissioning plan for the pipeline to the Department one year prior to the planned date of the decommissioning of the pipeline.

12. PERMIT ADVISORY FORUM

12.1 The permit holder must establish or join Permit Advisory Forum (or equivalent body) operational within the areas where the discharge takes place (Forum).

12.2 The Forum must, at a minimum, meet once every **quarter**, to discuss compliance with the permit conditions by the permit holder, current and future monitoring initiatives, continuous improvement initiatives, contingency plans, incidents, and reporting requirements as well as general effluent issues.

12.3 The Forum should, as far as possible, comprise of the permit holder (or a representative), interested, and affected parties (such as NGO's, local interested groups, etc.) and relevant government institutions.

12.4 The Forum may be established for either a single pipeline (i.e., one permit holder) or a receiving environment (i.e., several permit holders).

12.5 The Forum may be facilitated by an independent facilitator.

12.6 The Forum must make efforts to advertise the meetings widely to ensure a well-represented stakeholder attendance at meetings At least one meeting per year must be advertised in a local or provincial newspaper widely distributed in the area of operations. Proof of such advertisement must be sent to the Department.

12.7 The Forum must record detailed minutes of the meetings which must be submitted to the Department.

12.8 In the final year of the permit validity, the Forum must inform relevant stakeholders of the intention to renew the permit (if applicable) and must publish notification of such in a relevant provincial or local newspaper widely circulated in the area in both English and any other language widely spoken in the affected area. Stakeholders must be provided with an opportunity to comment on the proposed renewal at the meeting and/ or to send written comments within 30 days of the meeting or advertisement. The comments must be considered and captured in a comments and responses table which must be provided to the Department together with the renewal application.

13. REPORTING REQUIREMENTS

13.1 All reporting to the Department must be in writing as per Table 2:

Table 3 : Reporting requirements and frequency

REPORT TYPE	FREQUENCY OF REPORTING
Incidents that have occurred during an emergency (section 30 report as per NEMA), malfunctions or upset conditions	Immediately, or where that is not possible, within 7 (seven) calendar days
Minutes of Permit Advisory Forum meetings	Within one month of the meeting
The daily (quantity) in cubic meters and Weekly (quality) and Monthly (quality) discharged values	Quarterly
E.coli monitoring report	Monthly
E.coli Contingency Plan	Within 6 months of issuing of this permit
Monitoring Programme	Within 6 months of issuing of this permit
Environmental Monitoring Survey: Confirm mixing zone	Within 12 months of issuing this Permit
Feasibility Report	Within 18 months of issuing this Permit
Detailed Design and Engineering Reports	Within 24 months of issuing this Permit
Environmental monitoring Survey Report	Within 24 months of issuing this Permit
A comprehensive report detailing the construction and/ or modifications made	Within 30 months of issuing of this permit
Environmental Monitoring Survey: Verify required mixing zone	Within 36 months of issuing of this permit
Pipeline integrity	Annually
The calibration certificates for flow meters, recording and integrating devices as per the manufacturer's requirements for each piece of equipment	Annually

13.2 Any defects or deficiencies in terms of the coastal outfall pipeline must be reported to the Department **immediately**, or where that is not possible, within **7 (seven) calendar days.** Where necessary, repairs must be carried out on the pipeline immediately.

13.3 Failure to submit any required report may affect the Department's decision to renew or to issue a new permit upon expiry of this permit.

14 PERMIT VALIDITY

14.1 This permit is valid for a period of **3.5 (three and half) years** from the date of issue, subject to a compliance review as deemed necessary by the Department during the validity period of this permit.

14.2 The permit holder must submit a renewal application at least 6 (six) months before the expiry of this permit to the Department. Where a renewal application has been submitted to the Department before the lapsing of the validity period, the validity of this permit will automatically be extended ("the period of administrative extension") from the day before this permit would otherwise have lapsed, until the renewal application has been decided.

SECTION F: NOTIFICATION AND APPEALS

1. Within 14 (fourteen) days of receipt of this permit by the permit holder, notification of the decision together with a copy of the permit must be given by the permit holder all members of any forum which might have been established in terms of the previous permit held by the permit holder under the reference number **2014/021 /WC/WEST POINT PROCESSORS**
2. In terms of section 74 (2) of the ICM Act:

   "*A person who is dissatisfied with any decision taken to issue, refuse, amend, suspend, or cancel an authorization, may lodge a written appeal against that decision with – the Minister if the decision was taken by a person exercising powers which have been delegated by the Minister to such person in terms of this Act*".
3. Formal, motivated appeals must be submitted in writing within 30 (thirty) calendar days of the date of receipt of this permit by one of the following methods:

   By postal address: The Minister: Forestry, Fisheries and the Environment
   P.O. Box 447
   Pretoria
   0001

   By hand: 473 Steve Biko Street
   Environment House
   Arcadia
   Pretoria
   0083

   By email: appeals@dffe.gov.za
4. If the appellant is not the permit holder, the latter must be informed of the appeal within the appeal period referred to above and the appellant must provide the permit holder with reasonable access to a full copy of the appeal, if requested.
5. Appeals should be addressed to, and appeal forms can be obtained from:

   Ms Shehnaaz Rawat
   Director: Appeals (Cape Town)

E-mail: appeals@dffe.gov.za

SECTION G: REASONS FOR THE DECISION

1. During the validity period of this permit, the discharge of effluent into coastal waters from West Point Processors (Pty) Ltd is unlikely to:
   1.1. Cause irreversible or long-lasting adverse effects that cannot satisfactorily be mitigated.
   1.2. Prejudice significantly the achievement of any coastal management objectives contained in a coastal management programme or
   1.3. Be contrary to the interests of the whole community.
2. In reaching its decision, the Department, *inter alia*, considered the following:
   2.1. The information contained in the renewal application for a coastal waters discharge permit, dated 27 October 2021.
   2.2. The approved CWDP for West Point Processors was issued on 26 June 2017.
   2.3. Recommendations of the CWDP Compliance Review Meeting held at East Pier II, on 04 July 2022.
   2.4. Marine Specialist Study and Dispersion Modelling for the Proposed Expansion of the West Point Fish Meal Processing Plant, prepared by Anchor Environmental Consultants in 2021.
   2.5. The letter from the St Helena Bay Water Quality Trust dated 06 September 2021.
   2.6. The State of the St Helena Bay 2021/22 dated by November 2022;
   2.7. The comments that were received, from interested and affected parties, during the public participation process which took place from 23 November until 29 February 2024.
   2.8. The comments received from West Point during February 2024 in response to the revised draft CWDP sent to it for comment in January 2024, and the further letter of objection received from Resource Africa on behalf of West Point dated 2 August 2024 in response to a further revised permit sent to West Point for comment in June 2024.
   2.9. The declaration that all information submitted by the permit holder in connection with the granting of this permit is complete, factual, and accurate in all material respects.

SECTION H: DISCLAIMER

The Department of Forestry, Fisheries, and the Environment is exempted from any claims against loss or damage incurred by the permit holder in applying for, obtaining, and complying with the conditions of this permit or any non-compliance thereof.

----------END OF PERMIT----------

WESKUS DISTRIKSMUNISIPALITEIT
WEST COAST DISTRICT MUNICIPALITY

Rig alle korrespondensie aan:
Address all correspondence to:

MUNISIPALE BESTUURDER/
MUNICIPAL MANAGER

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

Posbus / P O Box 242
MOORREESBURG, 7310

Telefoon/Phone (022)
4338400
Faks/Fax Nr. 086 6926 113

E-Mail Adres/Address:
westcoastdm@wcdm.co.za

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

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

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

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

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

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

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

1. ATMOSPHERIC EMISSION LICENCE ADMINISTRATION

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

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

2. ATMOSPHERIC EMISSION LICENCE HOLDER DETAILS

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

3. LOCATION AND EXTENT OF PLANT

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

4. GENERAL CONDITIONS

4.1. Process and ownership changes

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

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

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

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

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

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

4.2. General duty of care

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

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

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

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

4.3. Sampling and/or analysis requirements

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

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

4.4. General requirements for licence holder

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

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

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

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

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

4.5. Statutory obligations

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

4.6. Payment of atmospheric emission licence processing fee

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

5. NATURE OF PROCESS

5.1. Process description

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

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

Fish sources, offloading and storage:

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

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

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

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

Fish cooking and dewatering:

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

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

Separation and evaporation:

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

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

Drying:

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

Milling and Filtration:

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

Bagging and Meal Warehouses:

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

Steam generation:

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

Seawater scrubber and chemical scrubber:

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

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

5.2. Listed activity or activities

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

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

Condition: Listed activity or activities:

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

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

5.3. Unit process or processes

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

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

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

5.4. Hours of operations

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

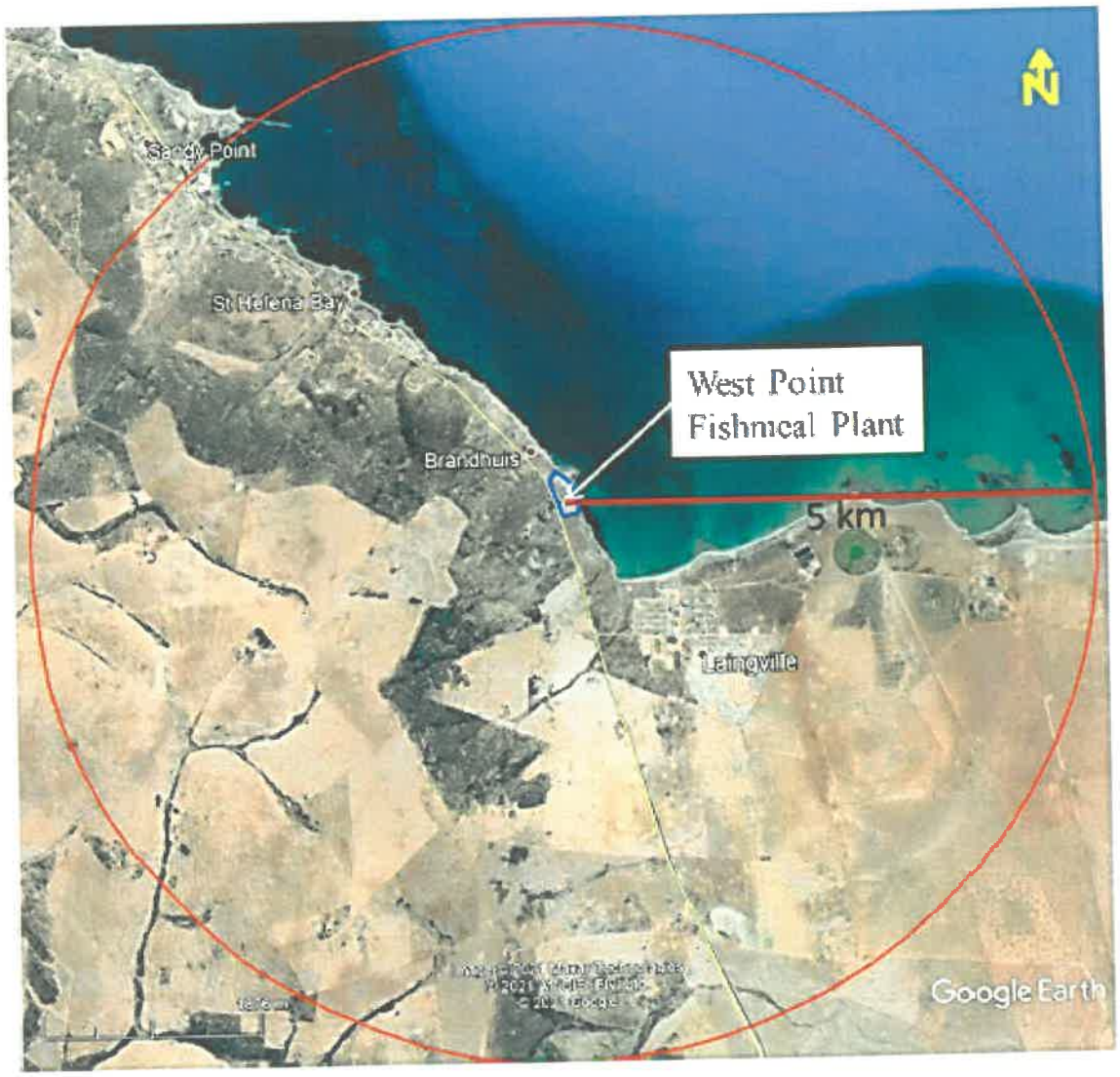
Unit Process	Operating Hours	Days of Operation per Year
Offloading Jetty	24 hours / day	365
On-site Cold storage Units	24 hours / day	365
Cooking Cookers	24 hours / day	365
Presses / Dewatering / Screens / Decanter	24 hours / day	365
Drying Dryers	24 hours / day	365
Dry Milling	24 hours / day	365
Packing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

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

5.5. Graphical process information

Diagrams depicting the graphical operation for the entire operation:

Geographical Location



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

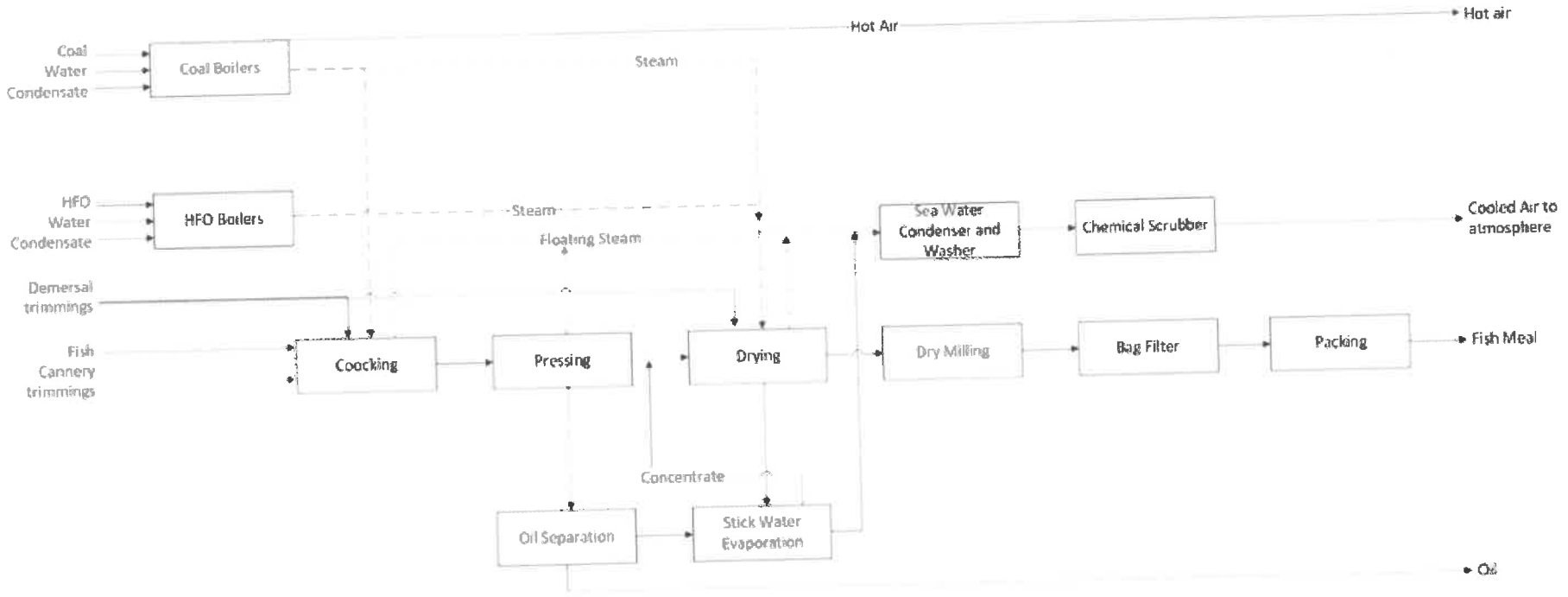
Context plan of the site situated on Erf 1097



WCWD015

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

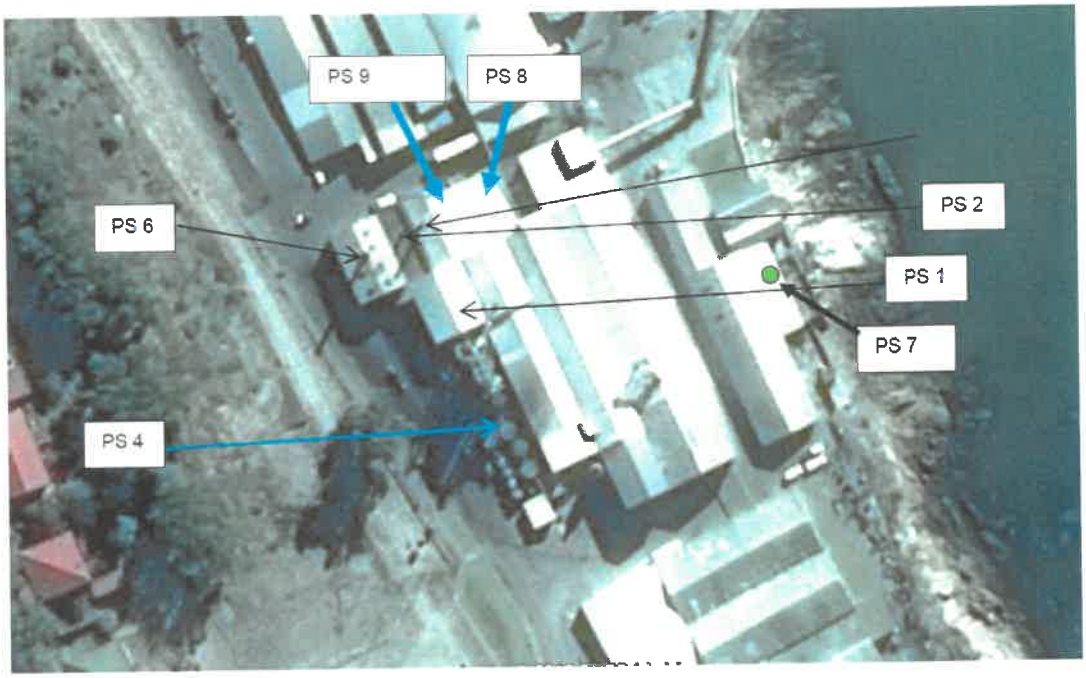
Simplified block diagram:



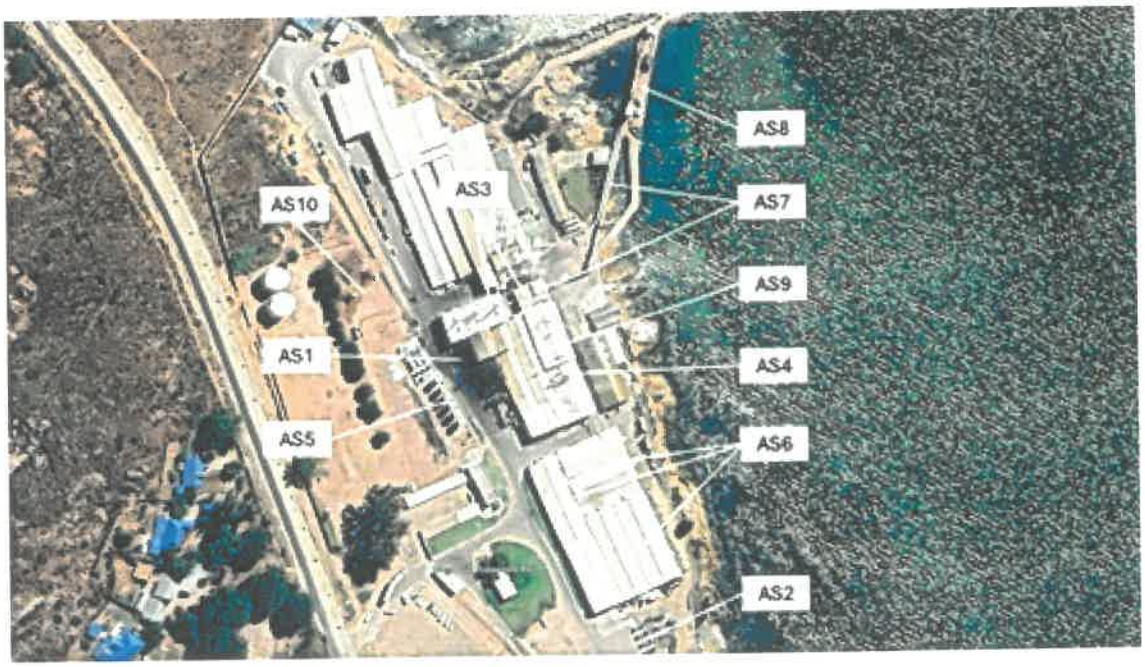
The diagram will be the same for all phases . The only difference is that Phase 2 will utilise LSO in the two HFO Boilers and Phases 3 & 4 will utilise one HFO Boiler only (with the added option of adding biomass over coal boilers from phase 3).

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

Locations of Point Sources



Locations of area sources



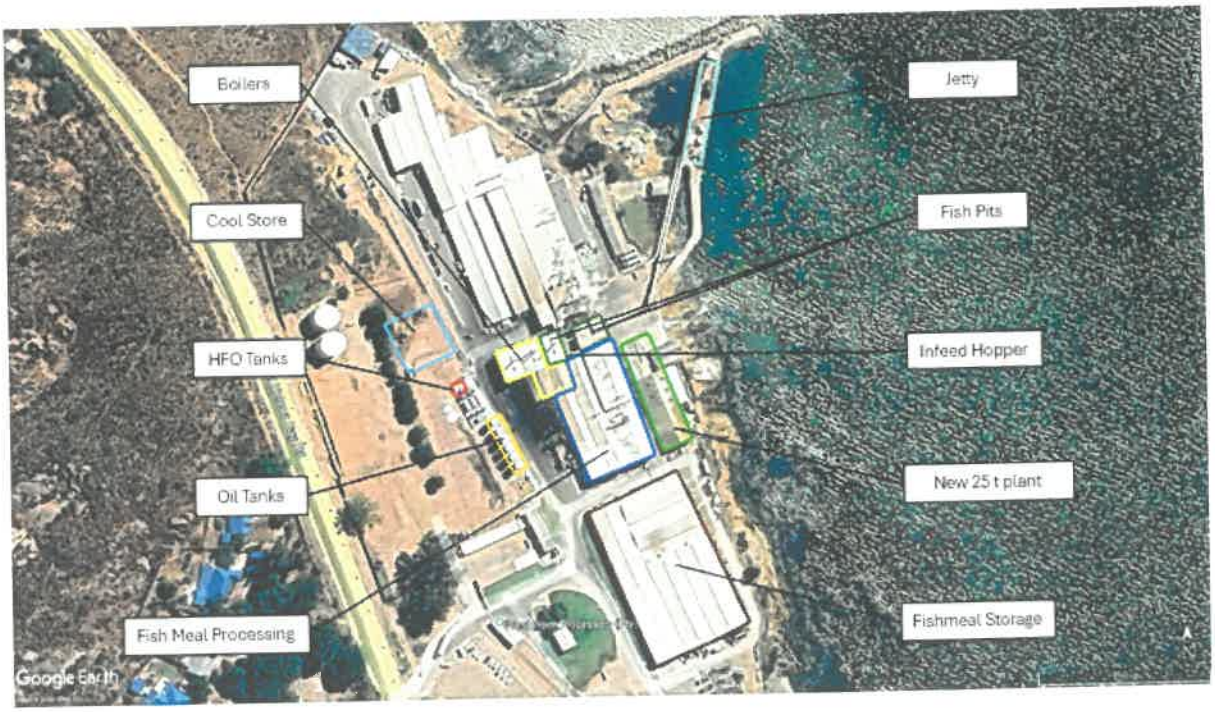
Air Quality Officer: ..... Senior Manager: Municipal Health S. Gleeson Date: 18 November 2025

Location of West Point Processors and the respective departments



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

Simplified site layout of West Point Processors



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

RAW MATERIALS AND PRODUCTS

6.1. Raw materials used

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

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

Conditions: Raw materials used

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

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

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

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

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

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

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

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

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

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

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

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

6.2. Production rates

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

6.3. Materials used in energy sources

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

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

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

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

6.4. Sources of atmospheric emission

6.4.1. a) Point source parameters - Existing Plant

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

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

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

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

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

6.4.2. Area and/or line source parameters

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

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

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7. APPLIANCES AND MEASURES TO PREVENT AIR POLLUTION

7.1. a) Appliances and control measures – Existing plant

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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7.6. Routine reporting and record-keeping

Complaints register

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

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

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

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

Quarterly reporting

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

Annual reporting

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

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

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

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

Reporting to the National Atmospheric Emissions Inventory System:

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

Greenhouse Gas Reporting

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

7.7. Investigation

The following investigations are required:

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

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

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

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

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

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

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

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