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PHS CONSULTING
environmental, land-use, eco-tourism planning and management.

NEMA Part 2 Environmental Authorisation Amendment Report

THE PROPOSED ADDITIONAL WATER RESERVOIRS, CONSOLIDATION OF DISCHARGE OUTFALL A&B AND ASSOCIATED INFRASTRUCTURE WITHIN THE EXISTING WEST POINT PROCESSORS FISH MEAL PLANT, PORTION 3 OF ERF 1097, ST HELENA BAY.



EAP Responsible for the application:

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Executive Summary

*PHS Consulting has been appointed by West Point Processors (Pty) Ltd the authorised applicant to undertake the Application for a Part 2 Amendment of the Environmental Authorisation (DEA&DP REF NO. 16/3/3/1/F4/20/3005/22) issued on 27 July 2022 for the proposed expansion of the West Point Fish Meal Processing Plant on Erf 1097, St Helena Bay (**Appendix A**). The property is located within an Urban Area and is zoned for industrial use (Fishing Industry Zone).*

The purpose of the Part 2 Amendment is aimed at optimising the design, layout and functioning of the existing facility at West Point Processing and is based on a number of factors:

- *West Point Processors need to increase the number of water storage reservoirs on site. The Saldanha Bay Municipality has been struggling to maintain pressure and to provide constant water flow. Additional on-site water storage capacity will therefore be required to support the site's operational demand and the proposed upgrades. The installation of additional reservoirs will assist in improving the site's water security, reducing reliance on immediate municipal supply during peak demand periods, and alleviating pressure on the municipal water supply flow.*
- *In addition, it has been recommended by the Marine Specialist that the two Discharge Pipelines (Outfall A & B) are to be combined into one outfall (Outfall B). In terms of the ICMA, any changes to existing land derived effluent into the marine environment as per an awarded Coastal Waters Discharge Permit (CWDP) requires a revision application to that permit (CWDP issued 29 June 2026). In line with CWDP amendment requirements, West Point Processes appointed Anchor Environmental Consultants (Pty) Ltd to undertake numerical dispersion modelling to assess potential for dilution and dispersion of the effluent from the fish processing plant. According to the Marine Impact Assessment resulting from this study the following recommendation was made: "In particular, it is recommended that the Outfall A and Outfall B effluents be combined and discharged together" which has proven to improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of "Elevated nutrient levels" and "increased suspended solid concentrations"). Outfall A will be retained for approved effluent discharges arising from unique operational requirements, and all remaining effluent will be gravity fed and discharged via the existing Outfall B.*
- *Lastly, there is also the inclusion of some minor administrative amendments to the description of the activity. With the inclusion of additional fish material (off-cuts and trimmings) from white fish (Demersal Fish) processing facilities (frozen or fresh) into the existing process facility (as per the Part 1 Amendment Application dated 8 JULY 2025) there is a need to introduce cold storage facilities on site to maintain the cold chain. Cold storage will be accommodated within the same area as the future woodchip store which has ample space.*

The detailed description of the activity, as summarised in the EA, the SDP and approved EMPr will therefore be amended in accordance with the above.

*The following Public Participation Process (**Appendix D**) will be undertaken:*

- *Registered I&APs, on the original I&AP Databas,e as well as potential I&APs, as per regulatory requirements, were notified of the 30-day public review of the Amendment Report.*
- *An advert was placed in the Westlander and a site notice was placed at the site.*
- *A copy of the Amendment Application is available on our website www.phsconsulting.co.za and information was distributed as required by I&AP's.*

- *Public participation commenced after the application was submitted to DEA&DP.*

The Marine Specialist was required to provide an Impact Assessment containing their professional opinion on the proposed amendment, identifying any additional impacts and their significance as well as making recommendations regarding any additional mitigation measures to be included in the updated Environmental Management Programme.

Specialist findings/recommendations summary:

*The only relevant specialist, as per the SSVR (**Appendix G**), is the Marine Specialist who was required to provide an updated Impact Assessment containing their professional opinion on the proposed amendment, identify any additional impacts and their significance as well as make a recommendation regarding any additional mitigation measures to be included in the updated Environmental Management Programme (EMPr).*

This Marine Specialist confirmed that by combining Outfall A and Outfall B effluents and discharging them together has proven to improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of "Elevated nutrient levels" and "increased suspended solid concentrations"). Outfall A will be retained for approved effluent discharges arising from unique operational requirements, and all remaining effluent will be gravity fed and discharged via the existing Outfall B.

*Combing Outfall A & B would therefore slightly reduce certain negative impact ratings and therefore would be considered the preferred alternative to the existing scenario. Furthermore, no additional mitigation measures have been recommended, that were not included in the previous EIA process, other than the revised pipeline configuration in accordance with the proposal and some minor mitigation measure included in the EMPr (**Appendix J**).*

*The Marine Impact Assessment has been included in **Appendix F**.*

No additional impacts would result from the proposed amendments in terms of Solid Waste, Water, Sewerage, Electricity, Stormwater or Traffic.

Based on the nature of the amendments; the findings of the specialist and the impact assessments undertaken, it is the opinion of the EAP that the proposed Part 2 Amendments to the Environmental Authorisation (16/3/3/1/F4/20/3005/22) should be granted.

The following reasons form the basis of this opinion:

- *There are no new negative impacts related to the Part 2 Amendment that has not been assessed as part of previous EA or through the original BA process.*
- *In fact, there is a slight reduction in the marine specialist impact ratings as a result of combing outfall A & B.*
- *With the additional reservoirs WPP can better manage its demand from the municipal line for a longer period. The footprint required for the additional reservoirs has no environmentally sensitive features and has been cleared in the past. Furthermore, the proposed footprint is within the approved footprint of the approved additional meal warehouse. Visually the site is already developed and is*

utilized and zoned for Industrial purposes. Positive Socio-Economic impacts are anticipated as a result of better site and operational logistics and reduced pressure on the Saldanha Bay Municipality.

- *Cold storage will be accommodated within the same approved footprint as the future woody biomass store which has ample space. The footprint required for the cold storage area has no environmentally sensitive features and is currently paved. No negative impacts are anticipated in this regard. Positive socio-economic impacts are expected by ensuring that the cold chain is not broken in the form of reduced odour-related incidents on site and improved product quality. The inclusion of this aspect is considered purely administrative.*
- *According to the Marine Specialist, combining the effluent from Outfall A & B will improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of "Elevated nutrient levels" and "increased suspended solid concentrations"). No new negative impacts will result from the combination of effluent. Mitigation measures are considered minimal in nature and are addressed through the EMPr.*

1. INTRODUCTION

1.1 Background

PHS Consulting has been appointed by West Point Processors (Pty) Ltd the authorised applicant to undertake the Application for a Part 2 Amendment of the Environmental Authorisation (DEA&DP REF NO. 16/3/3/1/F4/20/3005/22) issued on 27 July 2022 for the proposed expansion of the West Point Fish Meal Processing Plant on Erf 1097, St Helena Bay (**Figure 1**). The property is located within an Urban Area and is zoned for industrial use (Fishing Industry Zone). Refer to **Appendix A: Locality Maps**.



Figure 1: Locality plan showing the landside boundary of the property in red.

Furthermore, the West Point Processors (WPP) fish processing plant has been operating since 1948 and Environmental Authorisation (EA) was granted in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) on the 22 November 2010 for proposed upgrades that ultimately resulted in a reduction in air and odour emissions released from the fish processing plant with the intention that the facility operates more efficiently. In compliance with the EA a Coastal Waters Discharged Permit (CWDP) was applied for and granted to WPP on the 26 June 2017 [The CWDP was revised and is dated 29 June 2026] 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. The first Atmospheric Emissions Licence (AEL) was issued on the 8 November 2019 to WPP with numerous renewals undertaken

since, the most recent AEL is dated 18 November 2025. The site is therefore considered developed. Refer to **Appendix C: Environmental Authorisations / Permits.**

The purpose of the Part 2 Amendment is aimed at optimising the design, layout and functioning of the existing facility at West Point Processing and is based on a number of factors:

- West Point Processors need to increase the number of water storage reservoirs on site. The Saldanha Bay Municipality has been struggling to maintain pressure and to provide a constant water flow. Additional on-site water storage capacity will therefore be required to support the site's operational demand and the proposed upgrades. The installation of additional reservoirs will assist in improving the site's water security, reducing reliance on immediate municipal supply during peak demand periods, and alleviating pressure on the municipal water supply flow.
- In addition, it has been recommended by the Marine Specialist that the two Discharge Pipelines (Outfall A & B) are to be combined into one outfall (Outfall B). In terms of the ICMA, any changes to existing land derived effluent into the marine environment as per an awarded Coastal Waters Discharge Permit (CWDP) requires a revision application to that permit (CWDP issued 29 June 2026). In line with CWDP amendment requirements, West Point Processes appointed Anchor Environmental Consultants (Pty) Ltd to undertake numerical dispersion modelling to assess potential for dilution and dispersion of the effluent from the fish processing plant. According to the Marine Impact Assessment resulting from this study the following recommendation was made: "In particular, it is recommended that the Outfall A and Outfall B effluents be combined and discharged together" which has proven to improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of "Elevated nutrient levels" and "increased suspended solid concentrations"). Outfall A will be retained for approved effluent discharges arising from unique operational requirements, and all remaining effluent will be gravity fed and discharged via the existing Outfall B.
- Lastly, there is also the inclusion of some minor administrative amendments to the description of the activity. With the inclusion of additional fish material (off-cuts and trimmings) from white fish (Demersal Fish) processing facilities (frozen or fresh) into the existing process facility (as per the Part 1 Amendment Application dated 8 JULY 2025) there is a need to introduce cold storage facilities on site to maintain the cold chain. Cold storage will be accommodated within the same area as the future woodchip store which has ample space.

The detailed description of the activity, as summarised in the EA, the SDP and approved EMPr will therefore be amended in accordance with the above. Please refer to **Section 4** below and **Appendix B: Amended Site Development Plan**.

The existing development on site has access to water; sewer; electrical; waste removal; and road network services, with sufficient confirmed capacities. No upgrades or amendments are required that would affect service capacity or road infrastructure.

Access to the property is gained from the Main Road of St Helena Bay and is control via a security checkpoint. The proposal will not affect access, road infrastructure or stormwater management on site.

1.2 Part 2 Amendment/Report Requirements

A Part 2 Amendment will be undertaken in terms of Section 32 of the EIA Regulations, 2014 (as amended) which details the following requirements:

The Applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority,

(a.) a report, reflecting-

(i) an assessment of all impacts related to the proposed change;
(ii) advantages and disadvantages associated with the proposed change;
(iii)measures to ensure avoidance, management, and mitigation of impacts associated with such proposed change; and
(v) any changes to the EMPr.

which report-

(aa) had been subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and

(bb) reflects the incorporation of comments received, including any comments of the competent authority.

1.2.1 Public Participation Process

The following Public Participation Process will be undertaken:

- Registered I&APs on the original I&AP Database as well as relevant I&APs as per NEMA Regulatory requirements were notified of the 30-day public review of the Amendment Report.
- Notification letters were emailed to all identified I&APs informing them of the activity and the opportunity to comment. SMS's & WhatsApp's will be used in cases where no email addresses are available. Neighbouring landowners were requested to inform all those residing on their properties of the application and the opportunity to comment.
- A site notice was erected at the entrance to WPP along the Main Road.
- An advertisement was placed in the *Westlander*.

- A copy of the draft Part 2 Amendment Application Report (including the updated EMPr) is available on our company website www.phsconsulting.co.za

Please refer to Section 5 and **Appendix D: Public Participation Process**.

1.2.2 Specialist Studies

The only relevant specialist, as per the SSVR, is the Marine Specialist who was required to provide an updated Impact Assessment containing their professional opinion on the proposed amendment, identify any additional impacts and their significance as well as make a recommendation regarding any additional mitigation measures to be included in the updated Environmental Management Programme (EMPr).

The Marine Impact Assessment has been included in **Appendix F**.

1.2.3 Competent Authority

The DEA&DP (Region 1: City of Cape Town, West Coast District) is the competent authority tasked with the decision-making process with reference to Part 2 Amendments in terms of the EIA Regulations, 2014 (as amended).

Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000 Registry Office 1st Floor Utilitas Building, 1 Dorp Street, Cape Town Tel: (021) 483-5829 DEADPEIAadmin@westerncape.gov.za

1.2.4 Applicant

The applicant is the entity that will assume responsibilities as the holder of the amended environmental authorisation if granted. Details of the Applicant and Landowner:

The Director West Point Processors (Pty) Ltd. P.O. Box 15 ST HELENA BAY 7590 For Attention: Mr. M. Potgieter (022) 736 1100 marthin@saldanha.co.za

1.2.5 Assumptions and Limitations

It is assumed that PHS has been provided with all relevant project information and that it is correct and valid at the time it was provided. The following assumptions and limitations of the study must be considered in the interpretation of results presented in the Marine Assessment:

- The effluent profiles previously modelled for both Outfall A and Outfall B options and the combined option (volume, salinity, temperature inter alia as well as the outfall design) in 2023 (Wright 2023, Wright et al. 2023) to inform the update of this study remain the same.
- This study is based on details provided by the client as they pertain to planned infrastructure design and, effluent profile sites etc.
- The accuracy and confidence of this study is dependent on the data available for the marine and coastal environments of the west coast and St Helena Bay.
- This assessment is entirely desktop-based, and no new in situ data was made available for this assessment.

2. ENVIRONMENTAL ASSESSMENT PRACTITIONER

PHS Consulting
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Expertise of EAP:

JENNA THERON (Senior EAP) graduated from Stellenbosch University with a Bachelor's Degree in International Studies (2005) and a Master's Degree in Cultural Tourism and Heritage Studies (2007). Jenna has experience in the field of environmental and heritage planning since interning for the CoCT's Environmental and Heritage Department in 2008 and thereafter working as an Environmental Assessment Practitioner since 2009 to the present. With sufficient practical experience in terms of the criteria of the Interim Certificate Board for Environmental Assessment Practitioners of South Africa (EAPASA) for registration, Jenna was registered as an Environmental Assessment Practitioner. She is also a member of the International Association for Impact Assessment (IAIA) and an accredited Associate member with the Association of Professional Heritage Practitioners – Western Cape (APHP).

Please refer to **Appendix J: Amended EMPr** (Annexure 1: EAP Curriculum Vitae).

3. LEGISLATIVE FRAMEWORK

This section aims to provide an overview of key environmental legislation related to the proposed amendment process. Please note that only relevant legislation related to the amendment is described below.

3.1. The South African Constitution

The "*environmental guarantee"* clause in the Bill of Rights section of the Constitution of South Africa, Section 24, states that every person shall have the right to the following:

(a) An environment that is not harmful to their health nor well being; and

(b) To have that environment protected for the benefit of present and future generations, through reasonable legislative and other measures, which:

- *prevents pollution and ecological degradation;*
- *promotes conservation; and*
- *secures justifiable economic and social development and use of natural resources while promoting justifiable economic and social development.*

The amendment application achieves all three points in that limited environmental impacts would result from the proposed amendments, however it would promote economic and social development.

3.2. Marine Living Resources Act (Act No. 18 of 1998) ("MLRA)"

The purpose of the MRLA is to provide for the conservation of the marine ecosystems, the long-term sustainable utilisation of marine living resources and the orderly access to the exploitation, utilisation and protection of certain marine living resources; and for these purposes to provide for the exercise of control over marine living resources in a fair and equitable manner to the benefit of all the citizens of South Africa.

3.3. National Environmental Management Act, 1998 (Act 107 of 1998), as amended ("NEMA")

The National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), provides for co-operative environmental governance by establishing principles for decision making on matters affecting the environment, institutions that will promote co-operative governance and procedures for co-ordinating environmental functions exercised by organs of state; and to provide for matters connected therewith.

Section 2 of NEMA refers to the National Environmental Management Principles. The principles, set out below, amongst others, serve as the general framework within which environmental management and implementation plans must be formulated as well as to guide the interpretation, administration and implementation of this Act, and any other law concerned with the protection or management of the environment. Environmental principles guide all stakeholders in the manner in which they manage the environment. As stated in NEMA, "Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably." However, development must at the same time be socially, environmentally and economically sustainable. Sustainable development is therefore key to any EIA process and requires the

consideration of various aspects including the following, as per the principles of environmental management, which have been kept at the forefront of this application:

(2)(4) (a) Sustainable development requires the consideration of all relevant factors including the following:

i. *That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;*
ii. *that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;*
iii. *that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied;*
iv. *that waste is avoided, or where it cannot be altogether avoided, minimised and re-used or recycled where possible and otherwise disposed of in a responsible manner;*
v. *that the use and exploitation of non-renewable natural resources is responsible and equitable, and takes into account the consequences of the depletion of the resource;*
vi. *that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised;*
vii. *that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions; and*
viii. *that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.*

(b) Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.

(c) Environmental justice must be pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons.

(d) Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human well-being must be pursued and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.

(e) Responsibility for the environmental health and safety consequences of a policy, programme, project, product, process, service or activity exists throughout its life cycle.

(f) The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.

(g) Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.

(h) Community wellbeing and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.

(i) The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.

(j) The right of workers to refuse work that is harmful to human health or the environment and to be informed of dangers must be respected and protected.

(k) Decisions must be taken in an open and transparent manner, and access to information must be provided in accordance with the law.

(o) The environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest and the environment must be protected as the people's common heritage.

(p) The costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects must be paid for by those responsible for harming the environment.

(q) The vital role of women and youth in environmental management and development must be recognised and their full participation therein must be promoted.

(r) Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.

Lastly, section 28 (1) of NEMA (Duty of Care) states that: "*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…*"

3.3.1 Environmental Impact Assessment Regulations, 2014 (GN R 982 of 4 December 2014, as amended)

Furthermore, the NEMA makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant authorities based on the findings of an Environmental Impact Assessment (EIA). NEMA is a national act, which is enforced by the Department of Environmental Affairs (DEA). In the Western Cape, these powers are delegated to the Department of Environmental Affairs & Development Planning (DEA&DP). According to the list of activities identified under the EIA Regulations, by Listing Notice 1 (GN. R. 327), Listing Notice 2 (GN. R. 325), and Listing Notice 3 (GN. R. 324), published in Gazette No. 40772 on the 07 April 2017, the following activities were approved (**Appendix C6**):

Listing Notice 1 (327):

Activity Number 19A
"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
"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."

Activity Number: 38
"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.

Activity Number: 52
"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."

Activity Number: 65
"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."

Chapter 5 of the EIA Regulations (GN 982 of 4 December 2014), as amended, provides the process that must be followed in respect to amendments of environmental authorisations. The Regulations provide for two types of amendments that may be undertaken, namely:

- Part 1 Amendments (Section 29) - where no change in scope or a change of ownership occurs; and
- Part 2 Amendments (Section 31) - where a change in scope occurs.

DEA&DP have confirmed that a Part 2 Amendment is required. According to Section 31:

"An environmental authorisation may be amended by following the process prescribed in this Part if the amendment will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in the nature of impact where such level or change in the nature of impact was not-
(a) assessed and included in the initial application for environmental authorisation; or
(b) taken into consideration in the initial environmental authorisation. and the change does not, on its own, constitute a listed or specified activity".

3.4. National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEM: AQA)

According to Section 21 of the National Environmental Management: Air Quality Act, the Minister of Environmental Affairs is required to publish a list of activities which result in atmospheric emissions, and to establish minimum emissions standards in respect of a substance or mixture of substances resulting from those listed activities. The list of activities which result in atmospheric emissions and have or may have a significant detrimental effect on the environment, including health, social conditions, economic conditions, ecological conditions or cultural heritage was published on 22 November 2013.

Fishmeal processing falls under category 10: Animal Matter processing. For this listed activity, there are no emission limits given for air pollutants, but "Best practice measures intended to minimize or avoid offensive odours must be implemented by all installations". The first Atmospheric Emissions Licence (AEL) was issued on the 8 November 2019 to WPP with numerous renewals undertaken since, the most recent AEL is dated 18 November 2025 (**Appendix C4**).

National Ambient Air Quality Standards (NAAQS): The South African legislation and guidelines on the environmental management and air quality emission standards are:

- The National Environmental Management Act, Air Quality Act (Act No. 39 of 2004);
- The South African National Ambient Air Quality Standards (24 December 2009); and
- The National Ambient Air Quality Standard for Particulate Matter with Aerodynamic Diameter Less Than 2.5 Micron Meters (PM2.5) (29 June 2012).

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

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act 24 of 2008) (ICMA) is South Africa's primary legislation for the management and protection of the coastal environment. It operates within the framework of the National Environmental Management Act (NEMA) and aims to ensure that coastal resources are used sustainably for the benefit of present and future generations. The ICMA provides the legal framework for the integrated, sustainable management and protection of South Africa's coastal zone while balancing environmental conservation, public access, and economic development.

The Key Objectives of the Act is to

- Establish an integrated system for managing South Africa's coastline, estuaries, and coastal waters.
- Protect coastal ecosystems, biodiversity, and natural coastal processes.
- Regulate development within the coastal zone to ensure environmental sustainability.
- Preserve and enhance public access to the coast.
- Clarify the rights and responsibilities of government, landowners, and the public regarding coastal areas.
- Control pollution, dumping at sea, and activities that may damage the coastal environment.
- Address coastal risks such as erosion, storm surges, and sea-level rise.

NEM ICMA: Coastal Waters Discharge Permit Regulations (2018) (CWDP): The CWDP Regulations aim to provide an administrative framework for the implementation of Section 69 of the ICMA. The ICMA empowers the Department of Fisheries, Forestry and Environment (DFFE) to manage the discharge of effluent into coastal waters in a manner that ensures that users of coastal waters are not adversely affected, and that the environmental integrity of the coast is not compromised.

In compliance with the EA a Coastal Waters Discharged Permit (CWDP) was applied for and granted to WPP on the 26 June 2017 [Revised: 29 June 2026] in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act no.24 of 2008) (**Appendix C7**). Two separate discharge pipelines currently release effluent from the plant into the sea.

3.6. The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA")

The site is located within what is indicated to be the West Point Private Nature Reserve, which was 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 which 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 within the Protected Area (Core 1a) demarcation to the southwest.

3.7. National Heritage Resources Act, 1999 (Act 25 of 1999) ("NHRA")

The National Heritage Resources Act, 2005 (Act 25 of 1999), provides for the management of national heritage resources, to set norms and maintain national standards for the management of heritage resources in South Africa, and to protect heritage resources of national significance, so that heritage resources may be bequeathed to future generations.

No further heritage studies are recommended for this proposed development.

3.8. Guideline Documents:

The following are national guidelines that form part of the Environmental Impact Assessment Guideline Series

- General Guide to the EIA Regulations (DEA Guideline)
- Guidelines on Public Participation (DEA Guideline)
- Guideline on Assessment of Alternatives and Impacts (DEA Guideline)
- Guideline on Need and Desirability (DEA Guidelines)

DEA&DP's Environmental Impact Assessment Guideline and Information Document Series is formally published in terms of Section 24J of NEMA (March 2013). The published versions of the guidelines available in this series consist of the following guidelines – The underlined Guidelines particularly are used as a constant reference when undertaking any EIAs.

- Guideline on Transitional Arrangements
- Generic Terms of Reference for EAPs and Project Schedules
- Guideline on Public Participation
- Guideline on Alternatives
- Guideline on Need and Desirability
- Guideline on Exemption Applications
- Guideline on Appeals

The guidelines are constantly considered throughout every EIA process forming the basis on which alternatives are developed and assessed.

4. PROPOSED AMENDMENTS

The purpose of the Part 2 Amendment is aimed at optimising the design, layout and functioning of the existing facility at West Point Processing and is based on a number of factors:

- West Point Processors need to increase the number of water storage reservoirs on site. The Saldanha Bay Municipality has been struggling to maintain pressure and to provide a constant water flow. Additional on-site water storage capacity will therefore be required to support the site's operational demand and the proposed upgrades. The installation of additional reservoirs will assist in improving the site's water security, reducing reliance on immediate municipal supply during peak demand periods, and alleviating pressure on the municipal water supply flow. The proposed reservoirs would be in keeping with same materials and look as the existing approved reservoirs currently on site. Refer to **Appendix H** for the general arrangement design of the proposed reservoirs.
- In addition, it has been recommended by the Marine Specialist that the two Discharge Pipelines (Outfall A & B) are to be combined into one outfall (Outfall B). In terms of the ICMA, any changes to existing land derived effluent into the marine environment as per an awarded Coastal Waters Discharge Permit (CWDP) requires a revision application to that permit (CWDP issued 29 June 2026). In line with CWDP amendment requirements, West Point Processes appointed Anchor Environmental Consultants (Pty) Ltd to undertake numerical dispersion modelling to assess potential for dilution and dispersion of the effluent from the fish processing plant. According to the Marine Impact Assessment resulting from this study the following recommendation was made: "In particular, it is recommended that the Outfall A and Outfall B effluents be combined and discharged together" which has proven to improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of "Elevated nutrient levels" and "increased suspended solid concentrations"). Outfall A will be retained for approved effluent discharges arising from unique operational requirements, and all remaining effluent will be gravity fed and discharged via the existing Outfall B.
- Lastly, there is also the inclusion of some minor administrative amendments to the description of the activity. With the inclusion of additional fish material (off-cuts and trimmings) from white fish (Demersal Fish) processing facilities (frozen or fresh) into the existing process facility (as per the Part 1 Amendment Application dated 8 JULY 2025) there is a need to introduce cold storage facilities on site to maintain the cold chain. Cold storage will be accommodated within the same area as the future woodchip store which has ample space.

<u>The proposed amendments therefore include:</u>

The "activity authorised" in terms of Section B of the EA remains the same, it is only the following that will be amended (refer to **Appendix C6**):

[red items have been added and ~~red~~ items have been deleted]

"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~~ convey fish 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 (Woody biomass). Cold storage facilities will be established on site. 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~~ convey 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 proposed upgrades are expected to increase the site's water demand. Additional on-site water storage capacity will therefore be required to support the site's operational demand and the proposed upgrades and provide a buffer to reduce the demand on the municipal water supply line ~~The existing freshwater supply required for the proposed upgrades would result in an approx. additional 90 000m³ of potable water being required for the final phase resulting in construction of two on site Reservoirs (1000m³ 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 option of combining Outfall A and B and thereby consolidating the two discharge pipelines into a single discharge system, with the combined discharge being routed through Outfall B, has also been assessed as a viable option (Outfall A to be retained for approved effluent discharges arising from unique operational requirements). The onshore inline

filtration (or similar technology/ treatment) of effluent by removal of solids and pollutants prior to discharge will be implemented through phased improvements. The onshore treatment and associated ancillary infrastructure for the handling and treatment of effluent, including the removal of solids and pollutants prior to discharge, will be implemented through phased improvements. The improvement plan will remain adaptive, with subsequent requirements to be determined based on the results obtained through ongoing monitoring and evaluation in accordance with the Marine Specialist.

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)

1. 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*

2. The combining of Outfall A and Outfall B has also been investigated as an alternative to improve compliance, and the set up for this option is presented below:

- *Depth and Length: ± 7.2 m depth and an outfall length of approximately 500m*
- *Diameter: ±300 mm*

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."

The SDP has been updated to include these amendments – refer to **Figure 2A and 2B** below [**Appendix B: Amended Site Development Plan**]. **Appendix B (Figure 2B) is therefore put forward for authorization**.

The existing development on site has access to water; sewer; electrical; waste removal; and road network services, with sufficient confirmed capacities. No upgrades or amendments are required that would affect service capacity or road infrastructure.

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

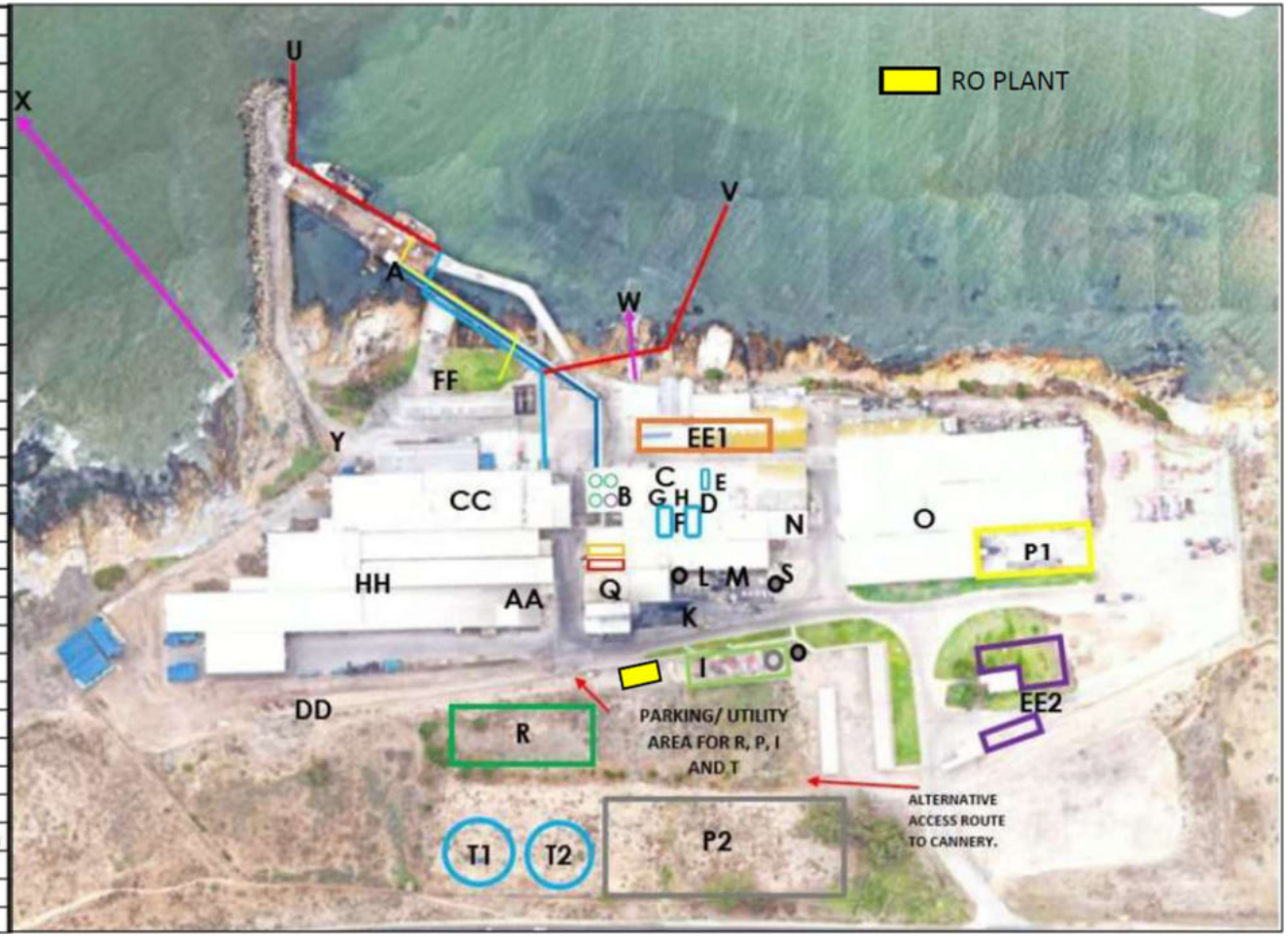


Figure 1A: Approved SDP.

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
X	Extend existing coastal water discharge Outfall B – Primary Outfall
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

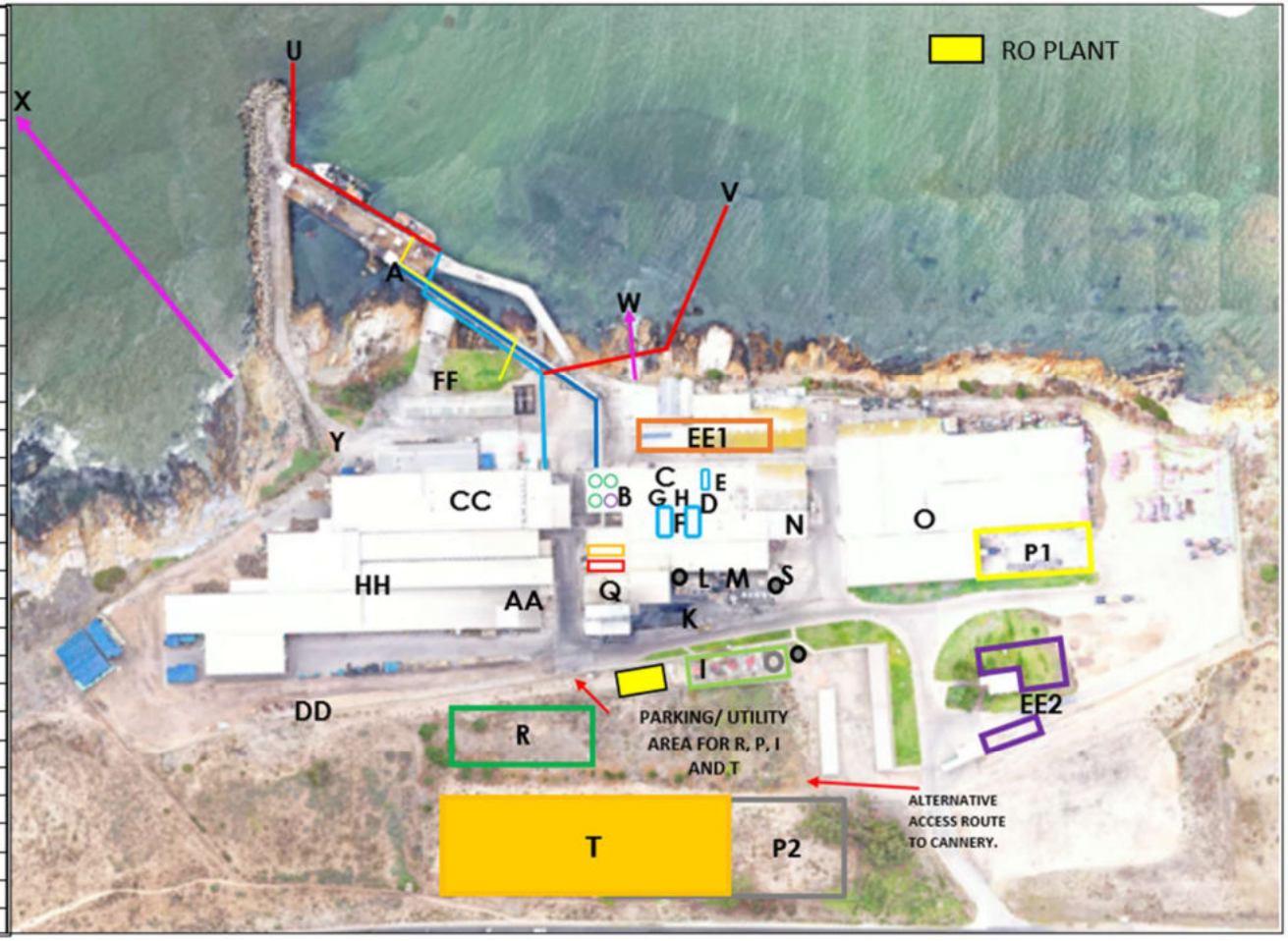


Figure 2B: Amended SDP: Proposed water reservoir area (T) is enlarged into future meal storage area (P2), Cold Storage added within the woody biomass storage area (R) and Outfall A (W) to be retained for approved effluent discharges arising from unique operational requirements with Outfall B (X) being the primary outfall.

5. PUBLIC PARTICIPATION

5.1. Identification of Interested and Affected Parties

A detailed Interested and Affected Party (I&AP) database was compiled, and a copy is included in **Appendix D1** (including a Registered I&AP List).

5.2. Notification of I&APs and Review of Amendment Report

Written notification was emailed to all I&APs on the I&AP Database (where email addresses were available). Proof of notification will be included in **Appendix D3**.

5.3. Site Notices

A site notice was placed at the entrance to the site - visible to the public. Proof will be included in **Appendix D4.**

5.4. Newspaper Notice

A Newspaper advert was placed in *the Westlander*. Proof will be included in **Appendix D2**.

5.5. Review of the Amendment Report

A 30-day review period will be provided, and a copy of the Amendment Report is available on our PHS website (www.phsconsulting.co.za). Alternatively, PHS Consulting can be contacted: Tel: 028 312 1734 | Cell: 082 566 1660 | Email: jt@phsconsulting.co.za

The comment period ends on Monday 16 November 2026.

5.6. Comment received

To be updated after the initial Public Participation Process is completed.

6. SPECIALIST STUDIES

A Marine Impact Assessment (**Annexure F**) was undertaken by Anchor Environmental Consultants (Pty) Ltd (Anchor) to clarify whether the proposed amendments would change the findings of the specialist studies and, if so, recommend any addition mitigation measures if required.

According to the Marine Specialist the Part 2 Amendment Application is motivated by a number of requirements, but of relevance to the Marine Assessment is to combine the two Discharge Pipelines (Outfall A & B) into one combined outfall. Anchor has undertaken a number of studies for the various Environmental Authorisations (EAs) and EA amendment applications for the WPP operations, including expansion activities and the inclusion of a reverse osmosis (RO) desalination plant (**Appendix C**). This study therefore includes an "*updated description of the affected environment and an overview of relevant existing near field dispersion models to demonstrate rates of initial dilution of updated effluent profile in the receiving environment. It also provides a description and assessment of all potential impacts associated with the intake of water and discharge of effluent to the marine environment in St Helena Bay, along with proposed mitigation and monitoring measures*."

Affected Environment:

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

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

St Helena Bay is positioned in the Southern Benguela ecoregion. Wind-driven coastal upwelling is the predominant physical driver that shapes the high levels of biological productivity in the

southern Benguela, providing nutrients for primary producers, and food for diverse fauna, such as pelagic (pilchards, anchovy) and demersal (hakes, kingklip) fish stocks, near shore fisheries (linefish, rock lobster), mammals (seals and whales) and seabirds (penguins, gannets, cormorants etc.). There are three broad marine habitats around the area of interest, and these include sand and rocky shores, kelp forest and the water column or pelagic habitat. Much of the coastal area around the WPP area is sandy shores (e.g. Southern Benguela Intermediate or Reflective Sandy Shore), or rocky shores (Cape Sheltered Rocky Shore), with kelp forests in the nearshore.

Much of St Helena Bay is classified as Vulnerable by the National Biodiversity Assessment, and this Vulnerable habitat extends northwards until 10 km north of Lambert's Bay. Currently Rocher Pan Marine Protected Area constitutes the only MPA within St Helena Bay, although the bay does include a West Coast Rock Lobster sanctuary in which no harvesting of this resource may occur.

St Helena Bay is falls within the Cape Canyon and Associated Islands, Bays and Lagoon Ecologically or Biologically Significant Marine Area (EBSA), which extends from Sixteen Mile Beach MPA in the south to about 10 km south of Lamberts Bay in the north This area was identified as a priority area through a national plan to identify areas for offshore protection and by a systematic biodiversity plan for the west coast, and was identified as an important area for pelagic ecosystems and species. The majority of St Helena Bay is an Ecological Support Area, with a slightly smaller area covered by a Critical Biodiversity Area (CBA) Restore site, and a few small areas designated as CBA Natural.

Dispersion modelling

WPP is investigating the implications of combining the Outfall A and Outfall B effluents (a combined outfall) to improve dilution prior to discharge. WPP is currently exploring potential options through a draft Water Management Plan (WMP), which aims to implement mitigation measures to address concerning parameters. Model simulations were undertaken following updated engineering design specifications, based on a maximum combined design flow rate of 1500 m3/hr (0.42 m3/s). To investigate the water quality impacts the effluent may have on the receiving environment, four scenarios were modelled to represent the combined outfall, ranging from the "worst case" effluent to "treated" effluent. Simulations were run using a conservative tracer to determine the optimum outfall configuration to maximise dilution potential.

Pollutant levels at the edge of the Recommended Mixing Zone (RMZ) are expected to comply with published Water Quality Guidelines (WQGs) which in turn are determined by the various beneficial users of the receiving environment. Near field modelling was performed using the Cornell Mixing Zone expert system (CorMix) to predict the geometry and dilution characteristics within the RMZ (100 m) for a range of discharge scenarios and to determine compliance with regional WQGs.

Single outfall model results indicate that discharging at a pipe end diameter of 495 mm results in a discharge velocity slightly above 2 m/s. The outfall diameter needs to be increased to 515 mm to maintain a velocity of 2 m/s. Discharging within 100 m of the shore results in bank attachment some 350 m downstream of the discharge. This is considered to be unacceptable from a marine ecological perspective — discharging at 500 m offshore ensures no bank attachment occurs and is the environmentally preferable option.

Near field results for all scenarios indicate that the untreated discharge via a single outfall 500 m from shore in 7.2 m of water does not meet the legislated WQG for ammonia-N and TSS at the 100 m RMZ for any of the pipe end diameters under consideration. The proposed 'semi-treated' (Scenario 3) and 'treated' (Scenario 4) effluent profiles significantly reduce the ammonia-N and TSS end of pipe concentrations. Under Scenario 4 in particular, the predicted ammonia-N concentration exceeds the threshold by 0.01 mg/L, while TSS exceeds the threshold by 0.5 mg/L. Given the conservative modelling approach, this may indeed be compliant in situ. It is critical therefore that environmental monitoring be undertaken to validate this result.

Impact assessment

A total of eleven potential environmental impacts were assessed operation for this report, 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 identified impacts, one was rated as Insignificant' and do not require mitigation, five were rated as of Very Low significance before mitigation (rated Very Low or Insignificant after mitigation). Five impacts were rated as of Low significance and are reduced to Very Low significance with mitigation). Two impacts were rated as High significance, with implementation of mitigation measures expected to reduce this rating to Low significance.

*A summary of potential impacts is provided in **Table 1** below.*

***Table 1**. Summary of potential marine impacts.*

Phase	Impact identified	Significance before mitigation	Significance with mitigation
Construction	Impact 1: Disturbance of intertidal and subtidal habitat	VERY LOW	INSIGNIFICANT
	Impact 2: Disturbance of pelagic habitat.	INSIGNIFICANT	n/a
	Impact 3: Litter pollution.	LOW	VERY LOW
	Impact 4: Hazardous substance spills.	LOW	VERY LOW
	Impact 5: Increased noise and vibration.	VERY LOW	INSIGNIFICANT
Operation	Impact 6: Disturbance marine life due to the intake of seawater	LOW	VERY LOW
	Impact 7: Changes in salinity	VERY LOW	n/a
	Impact 8: Elevated nutrient levels	HIGH	LOW
	Impact 9: Increased suspended solid concentrations.	HIGH	LOW
	Impact 10: Changes in temperature.	VERY LOW	INSIGNIFICANT
	Impact 11: Sediment scouring and shifts in sediment movement patterns	LOW	VERY LOW
	Impact 12: The impacts of discharged co-pollutants on marine biota	LOW	VERY LOW
	Cumulative impacts	MEDIUM	LOW

The primary cumulative impacts for this development are related to other discharges of nitrogenous waste (i.e., nutrients) into the same receiving environment i.e. from other fish factory farm discharges and Wastewater Treatment Works (WWTWs). The cumulative nutrient loading of the southern, sheltered portion of St Helena Bay due to long-term fish factory discharges is ongoing, and detailed in the 2023 State of St Helana Bay report. These impacts must be managed through onshore treatment across all factories as a whole, and should include the improvement of effluent quality as well as improvement of record keeping and monitoring to inform management actions and monitor success of interventions. It is strongly recommended that any effluent improvement strategy be undertaken in incremental stages, with more frequent and reliable monitoring data used to assess management outcomes of the specific intervention and inform the next stages.

<u>Monitoring recommendations</u>

The end of pipe concentrations published in the permit conditions must be met to ensure compliance at the edge of the RMZ. Compliance monitoring of the effluent before discharge should therefore be performed to minimise environmental impacts. If discharged effluent exceeds the end of pipe values at any time, the operation will be in violation of the CWDP and the cause of poor effluent quality must be identified, reported and rectified immediately.

A continuous in situ monitoring program should be implemented to validate the dispersion modelling and assess compliance with WQGs. A data logging instrument capable of measuring conductivity, temperature and depth (CTD) should be moored at the 100 m RMZ for a period of at least one year. Additional quarterly monitoring should be conducted at the sites (including adequate control sites) for temperature, TSS, dissolved oxygen, salinity, ammonia and pH at the edge of the RMZ.

It is recommended that rocky intertidal and subtidal communities be monitored. Biological indicators such as species abundance, biomass and diversity provide a direct measure of the state of the ecosystem in space and time and tend to be directly affected by pollution/disturbance. It is recommended that a minimum of three sites be monitored in the vicinity of each outfall, with three control sites. Monitoring should be aligned to the State of St Helena Bay monitoring program methodology so that any changes detected can be assessed in the context of larger scale trends in the Bay.

Please refer to **Appendix F: Marine Impact Assessment.**

No additional impacts would result from the proposed amendments in terms of Solid Waste, Water, Sewerage, Electricity, Stormwater or Traffic service capacities.

7. IMPACTS RELATED TO THE PROPOSED CHANGES

The following potential Impacts are associated with the proposed amendments:

Table 2: *Summary of potential impacts associated with amendment.*

Item	Description of amendment	Potential Impact
1	<u>Additional water reservoirs</u> Increase the number of water reservoirs on site. The Saldanha Bay Municipality has been struggling to maintain water pressure and to provide a constant water flow. With the additional reservoirs WPP can better manage its demand from the municipal line for a longer period.	The footprint required for the additional reservoirs has no environmentally sensitive features on it and has been cleared in the past. Furthermore, the proposed footprint is within the footprint of the previously approved additional meal warehouse. Two reservoirs already exist on site, and the same materials will be utilized to construct the additional reservoirs. Visually the site is already developed and is utilized and zoned for Industrial purposes. Positive Socio-Economic impacts are anticipated as a result of better site and operational logistics and reduced pressure on the Saldanha Bay Municipality.
2	<u>Combining Outfall A & B</u> Outfall A and Outfall B effluents will be combined and discharged together. Outfall A will be retained for approved effluent discharges arising from unique operational requirements, and all remaining effluent will be gravity fed and discharged via the existing Outfall B.	According to the Marine Specialist this will improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of "Elevated nutrient levels" and "increased suspended solid concentrations"). No new negative impacts are expected.
3	Cold storage will be accommodated within the same footprint as the previously approved woody biomass store which has ample space for both.	The footprint required for the cold storage area has no environmentally sensitive features on it and is currently paved. The proposed footprint is within the approved footprint of the woody biomass storage area. Containers are placed on the paved area serving as cold storage. No impacts are anticipated in this regard other than positive socio-economic impacts ensuring that the cold chain is not broken between transportation and processing. This ensures reduced odour-related incidents on site and improved product quality.

Table 3: *Impact Assessment tables in accordance with the original EA with changes in ratings indicated in RED below.*

PLANNING, DESIGN AND DEVELOPMENT PHASE **THE IMPACTS ASSOCIATED WITH THE DESIGN / CONSTRUCTION PHASE OF THE PROJECT REMAIN THE SAME.**	
MARINE ECOLOGY	
Potential impact and risk:	**Impact 1: Disturbance of intertidal and subtidal habitat**
Nature of impact:	**Disturbance of intertidal and subtidal habitat as a result of discharge pipelines.**
Extent and duration of impact:	**Local and Short term**
Consequence of impact or risk:	**Very Low**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**INSIGNIFICANT**
Degree to which the impact can be reversed:	**INSIGNIFICANT**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Proposed mitigation:	**Essential mitigation measures:** **• Limit duration of construction activities in the coastal zone.** **• Constrain spatial extent of impacts to the minimum required.**
Residual impacts:	
Cumulative impact post mitigation:	**VERY LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**INSIGNIFICANT**
Potential impact and risk:	**Impact 2: Ecological effects due to the temporary disturbance of pelagic open water habitats.**
Nature of impact:	**Ecological effects due to the temporary disturbance of pelagic open water habitats.**
Extent and duration of impact:	**Local and short term**
Consequence of impact or risk:	**Very Low**
Probability of occurrence:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**N/A**
Degree to which the impact can be reversed:	**N/A**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**INSIGNIFICANT**
Proposed mitigation:	**Not considered necessary due to low significance.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**N/A**
Potential impact and risk:	**Impact 3: Litter pollution generated during construction.**
Nature of impact:	**Litter pollution generated during construction.**
Extent and duration of impact:	**Regional and Medium Term**
Consequence of impact or risk:	**Low**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**LOW**
Degree to which the impact can be reversed:	**LOW**
Indirect impacts:	

Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Proposed mitigation:	**<u>Essential mitigation measures:</u>** • **Check vehicles for hydrocarbon leaks daily.** • **Protocols for dealing with accidental spills must be in place.** • **Emergency equipment to isolate spills must be accessible.** • **Provide suitable containers for the disposal of all waste, including recycling.** • **Inform all staff about sensitive marine species and suitable disposal of construction waste.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
Potential impact and risk:	**Impact 4: The effect of the spillage of hazardous substances on marine biota**
Nature of impact:	**The effect of the spillage of hazardous substances on marine biota**
Extent and duration of impact:	**Local and Medium Term**
Consequence of impact or risk:	**Medium**
Probability of occurrence:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**LOW**
Degree to which the impact can be reversed:	**LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Proposed mitigation:	**<u>Essential mitigation measures:</u>** • **Intentional disposal of any substance into the environment is strictly prohibited, while accidental spillage must be** • **prevented, contained and reported immediately.** • **Implementation of a rigorous environmental management and control plan (including procedures for remediation).** • **All fuel and oil are to be stored with adequate spill protection.** • **No leaking vehicles are permitted on site.** • **All hazardous substances must be accompanied by a permit, a hazard report sheet, and a first aid treatment protocol and may only be handled by suitably trained operators.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
Potential impact and risk:	**Impact 5: The effect of increased noise and vibration from construction on marine organisms.**
Nature of impact:	**The effect of increased noise and vibration from construction on marine organisms.**
Extent and duration of impact:	**Local and Short Term**

Consequence of impact or risk:	**Very Low**
Probability of occurrence:	**Definite**
Degree to which the impact may cause irreplaceable loss of resources:	**LOW**
Degree to which the impact can be reversed:	**LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
Proposed mitigation:	**Best practise mitigation measures:** **Subject mobile equipment, vehicles and power generation equipment to noise tests at commencement and periodically throughout the construction phase.**
Residual impacts:	
Cumulative impact post mitigation:	**VERY LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**INSIGNIFICANT**
GENERAL	
Potential impact and risk:	**DUST CONTROL**
Nature of impact:	**Dust due to the construction activities associated with the proposed upgrades.**
Extent and duration of impact:	**Limited to the site and its immediate surroundings - Short term**
Consequence of impact or risk:	**Very Low**
Probability of occurrence:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Insignificant**
Degree to which the impact can be reversed:	**Insignificant**
Indirect impacts:	
Cumulative impact prior to mitigation:	**Insignificant**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Proposed mitigation:	**Implementation of the EMPr (Appendix H).**
Residual impacts:	
Cumulative impact post mitigation:	**Insignificant**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Insignificant**
Potential impact and risk:	**NOISE CONTROL**
Nature of impact:	**NOISE resulting from the construction activities associated with the proposed upgrades.**
Extent and duration of impact:	**Limited to the site and its immediate surroundings - Short term**
Consequence of impact or risk:	**Very Low**
Probability of occurrence:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**Insignificant**
Degree to which the impact can be reversed:	**Insignificant**
Indirect impacts:	
Cumulative impact prior to mitigation:	**Insignificant**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Proposed mitigation:	**Implementation of the EMPr (Appendix H).**
Residual impacts:	
Cumulative impact post mitigation:	**Insignificant**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Insignificant**

OPERATIONAL PHASE	
MARINE ECOLOGY **ACCORDING TO THE MARINE SPECIALIST COMBINING OUTFALL A & B WILL IMPROVE DILUTION OF EFFLUENT PRIOR TO DISCHARGE THEREBY REDUCING THE IMPACT SIGNIFICANCE OF CERTAIN IMPACTS.**	
Potential impact and risk:	**Impact 6: Disturbance and/or mortality of marine life due to the intake of seawater via pipeline.**
Nature of impact:	**Disturbance and/or mortality of marine life due to the intake of seawater via pipeline.**
Extent and duration of impact:	**Low and Long Term**
Consequence of impact or risk:	**Low**
Probability of occurrence:	**Definite**
Degree to which the impact may cause irreplaceable loss of resources:	**LOW**
Degree to which the impact can be reversed:	**LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Proposed mitigation:	**Essential mitigation measures:** • **Intake velocities should be kept below 0.15 m/s to ensure that fish and other mobile organisms can escape the intake current. Intake velocities can be reduced to the requisite 0.15 m/s through the use of footer values.** • **Intake structures should be positioned away from sensitive environments or areas with high species diversity or abundance, like rocky reefs, and should not draw in water from the upper meter of the water column.** • **Intake structures should ensure the horizontal intake of water. This can be achieved through use of footer valves.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
Potential impact and risk:	**Impact 7: Changes in salinity.**
Nature of impact:	**Changes in salinity**
Extent and duration of impact:	**Local and Long Term**
Consequence of impact or risk:	**Low**
Probability of occurrence:	**Improbable**
Degree to which the impact may cause irreplaceable loss of resources:	**VERY LOW**
Degree to which the impact can be reversed:	**VERY LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
Proposed mitigation:	**Essential mitigation measures:** **Effluent must be discharged via the pipeline configuration modelled here (i.e. at 7.2 m depth, 500 m offshore).**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
Potential impact and risk:	**Impact 8: Elevated nutrient levels.**
Nature of impact:	**Elevated nutrient levels.**
Extent and duration of impact:	**Local and Long Term**

Consequence of impact or risk:	**High**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**LOW**
Degree to which the impact can be reversed:	**LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**MEDIUM**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH**
Proposed mitigation:	**Essential mitigation measures:** • **Implement the proposed WMP. Discharge must meet the Scenario 4 effluent quality (Table 4-1).** • **Effluent must be discharged via the pipeline configuration modelled here (i.e. at 7.2 m depth, 500 m offshore).** • **Monitoring of end of pipe concentrations must be conducted and operations adjusted should adverse effects be detected by the monitoring program.** • **Ecological and water quality monitoring must be conducted in the vicinity of the outfall, to detect potential changes in subtidal community structure as a result of the discharge.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM (prior to Amendments)** **LOW (after Amendments)**
Potential impact and risk:	**Impact 9: Elevated suspended solid**
Nature of impact:	**Increased suspended solid concentrations**
Extent and duration of impact:	**Local and Long Term**
Consequence of impact or risk:	**High**
Probability of occurrence:	**Definite**
Degree to which the impact may cause irreplaceable loss of resources:	**LOW**
Degree to which the impact can be reversed:	**LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**MEDIUM**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH**
Proposed mitigation:	**Essential mitigation measures:** • **Implement the proposed WMP. Discharge must meet the Scenario 4 effluent quality (Table 4-1).** • **Effluent must be discharged via the pipeline configuration modelled here (i.e. at 7.2 m depth, 500 m offshore).** • **Monitoring of end of pipe concentrations must be conducted and operations adjusted should adverse effects be detected by the monitoring program.** • **Ecological and water quality monitoring must be conducted in the vicinity of the outfall, to detect potential changes in subtidal community structure as a result of the discharge.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Potential impact and risk:	**Impact 10: Changes in temperature.**

Nature of impact:	**Potential changes in temperature.**
Extent and duration of impact:	**Low and Long Term**
Consequence of impact or risk:	**Very Low**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**Very Low**
Degree to which the impact can be reversed:	**Very Low**
Indirect impacts:	
Cumulative impact prior to mitigation:	**MEDIUM**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH (prior to Amendments)** **LOW (after Amendments)**
Proposed mitigation:	**Essential mitigation measures:** • **Effluent must be discharged via the pipeline configuration modelled here (i.e., at 7.2 depth, 500 m offshore).** • **Monitoring of end of pipe concentrations must be conducted and operations adjusted should adverse effects be detected by the monitoring program.** • **Ecological and water quality monitoring must be conducted in the vicinity of the outfall, to detect potential changes in subtidal community structure as a result of the discharge.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW (prior to Amendments)** **INSIGNIFICANT (after Amendments)**
Potential impact and risk:	**Impact 11: Sediment scouring and shifts in sediment movement patterns**
Nature of impact:	**Sediment scouring and shifts in sediment movement patterns**
Extent and duration of impact:	**Local and Long Term**
Consequence of impact or risk:	**Medium**
Probability of occurrence:	**Possible**
Degree to which the impact may cause irreplaceable loss of resources:	**VERY LOW**
Degree to which the impact can be reversed:	**VERY LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Proposed mitigation:	**Essential mitigation measures:** **The diffuser must be angled towards the water surface to enable water to jet upwards into the water column (as per Section 4.3.2).**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
Potential impact and risk:	**Impact 12: The impacts of discharged co-pollutants on marine biota.**
Nature of impact:	**The impacts of discharged co-pollutants on marine biota as a result of the RO Plant.**
Extent and duration of impact:	**Local and Medium Term**
Consequence of impact or risk:	**Low**
Probability of occurrence:	**Definite**
Degree to which the impact may cause irreplaceable loss of resources:	**VERY LOW**

Degree to which the impact can be reversed:	**VERY LOW**
Indirect impacts:	
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Proposed mitigation:	**Essential mitigation measures:** • **Aeration of the effluent prior to discharge must be undertaken should oxygen levels drop below 5 mg/L 90% of the time.** • **Strong acidic and alkaline solutions must be neutralised.** • **Construction and operation must occur in line with the results of the relevant dispersion modelling study to ensure that the effluent plume does not exceed that modelled, specifically with regards to depth of discharge, process with the brine discharge to allow for maximum dilution before release into the environment.** • **Monitoring of end of pipe concentrations must be conducted and adjust dosing levels should adverse effects be detected by the monitoring program.**
Residual impacts:	
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW**
AIR EMISSIONS **THE IMPACTS ASSOCIATED WITH AIR EMISSIONS OF THE PROJECT REMAIN THE SAME. THE AMENDMENTS DO NOT IMPACT ON AIR EMMISSIONS.**	
Potential impact and risk:	**Air Quality**
Nature of impact:	**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.**
Extent and duration of impact:	**Local and Long term**
Consequence of impact or risk:	**Low**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**Low**
Degree to which the impact can be reversed:	**High**
Indirect impacts:	**-**
Cumulative impact prior to mitigation:	**Medium**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**
Proposed mitigation:	**HFOs using LSO in Phase 2A; Increase PS2 stack height to 23 m; For Phases 3 and 4 utilise only one HFO boiler with normal HFO fuel. 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.**
Residual impacts:	**-**
Cumulative impact post mitigation:	**Low**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low**

SOCIO-ECONOMIC **POSITIVE SOCIO-ECONOMIC IMPACTS ARE ANTICIPATED AS A RESULT OF BETTER SITE AND OPERATIONAL LOGISTICS AND REDUCED PRESSURE/ RELIANCE ON THE SALDANHA BAY MUNICIPALITY. IN ADDITION, ENSURING THE COLD CHAIN IS NOT BROKEN WOULD REDUCED ODOUR-RELATED INCIDENTS ON SITE AND IMPROVE PRODUCT QUALITY.**	
Potential impact and risk:	**Employment & Economic Contributions to the local and regional Economy.** **Additional positive socio-economic impacts are anticipated as a result of better site and operational logistics, reduced pressure/ reliance on the Saldanha Bay Municipality, reduced odour-related incidents on site and improve product quality.**
Nature of impact:	**Employment Opportunities & Economic Contributions to the local and regional Economy.**
Extent and duration of impact:	**Local/ regional and long term**
Consequence of impact or risk:	**MEDIUM**
Probability of occurrence:	**Highly Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**-**
Degree to which the impact can be reversed:	**-**
Indirect impacts:	**-**
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM**
Proposed mitigation:	**None required**
Residual impacts:	**-**
Cumulative impact post mitigation:	**-**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**-**
VISUAL	
Potential impact and risk:	**Visually the site is already developed and is utilized and zoned for Industrial purposes.**
Nature of impact:	**Visually the site is already developed and is utilized and zoned for Industrial purposes.**
Extent and duration of impact:	**Local and long term**
Consequence of impact or risk:	**LOW**
Probability of occurrence:	**Probable**
Degree to which the impact may cause irreplaceable loss of resources:	**-**
Degree to which the impact can be reversed:	**-**
Indirect impacts:	**-**
Cumulative impact prior to mitigation:	**LOW**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW**
Proposed mitigation:	**Visually the site is already developed and is utilized and zoned for Industrial purposes. Reservoirs already existing on site and the additional reservoirs will be constructed in the same materials/ proportions.**
Residual impacts:	**-**
Cumulative impact post mitigation:	**LOW**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW - INSIGNIFICANT**
DECOMMISSIONING AND CLOSURE PHASE	
NO DECOMMISSIONING IS REQUIRED.	

8. ADVANTAGES AND DISADVANTAGES ASSOCIATED WITH THE AMENDMENT PROPOSED

There are no new impacts related to the Part 2 amendment that have not been assessed as part of previous EA or through the original BA process.

The Saldanha Bay Municipality has been struggling to maintain water pressure and to provide a constant water flow to the site. With the additional reservoirs WPP can better manage its demand from the municipal line for a longer period. The footprint required for the additional reservoirs has no environmentally sensitive features and has been cleared in the past. Furthermore, the proposed footprint is within the footprint of the approved additional meal warehouse. Two reservoirs already exist on site, and the same materials will be used to construct the additional reservoirs. Visually the site is already developed and is utilized and zoned for Industrial purposes.

Positive Socio-Economic impacts are anticipated as a result of better site and operational logistics and reduced pressure on the Saldanha Bay Municipality.

Outfall A and Outfall B effluents will be combined and discharged together. All effluent will be gravity fed and discharged via the existing Outfall B (Outfall A will only be retained for approved effluent discharges arising from unique operational requirements). According to the Marine Specialist this will improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of “Elevated nutrient levels” and “increased suspended solid concentrations”). No negative impacts will result from the combination of effluent through one outfall.

Cold storage will be accommodated within the same footprint as the future woody biomass store which has ample space. The footprint required for the cold storage area has no environmentally sensitive features and is currently paved. No negative impacts are anticipated in this regard. Positive socio-economic impacts are expected by ensuring that the cold chain is not broken in the form of reduced odour-related incidents on site and improved product quality. This aspect is included more from an administrative perspective.

9. RECOMMENDED MITIGATION MEASURES

All mitigation measures proposed previously are still applicable to this application. Additional mitigation measures are considered minimal in nature and are addressed through the EMPr. These include:

- Intake structures should be positioned away from sensitive environments or areas with high species diversity or abundance, like rocky reefs, and should not draw in water from the upper meter of the water column.
- Implement the proposed WMP. Discharge must meet the Scenario 4 effluent quality (Table 4-1 of the Marine Impact Assessment (2026)).
- The diffuser must be angled towards the water surface to enable water to jet upwards into the water column.

Bulk service capacity confirmation remains unchanged for the amendment.

10. PROPOSED CHANGES TO THE ENVIRONMENTAL MANAGEMENT PROGRAMME

Based on the proposed amendments minor changes are required to the EMPr. The amendments are largely administrative and reflect the amendments made to the description of the activity.

These amendments made to the EMPr are in blue and underlined in **Appendix J: Environmental Management Programme (EMPr)**.

11. REASONED OPINION OF THE EAP

Based on the nature of the amendments; the findings of the specialist and the impact assessment undertaken, it is the opinion of the EAP that the proposed Part 2 Amendments to the Environmental Authorisation (16/3/3/1/F4/20/3005/22) should be granted.

The following reasons form the basis of this opinion:

- There are no new negative impacts related to the Part 2 amendments that have not been assessed as part of previous EA or through the original BA process.
- In fact, there is a slight reduction in the marine specialist impact ratings as a result of combing outfall A & B.
- With the additional reservoirs WPP can better manage its demand from the municipal line for a longer period. The footprint required for the additional reservoirs has no environmentally sensitive features and has been cleared in the past. Furthermore, the proposed footprint is within the approved footprint of the approved additional meal warehouse. Visually the site is already developed and is utilized and zoned for Industrial purposes. Positive Socio-Economic impacts are anticipated as a result of better site and operational logistics and reduced pressure on the Saldanha Bay Municipality.
- Cold storage will be accommodated within the same approved footprint as the future woody biomass store which has ample space. The footprint required for the cold storage area has no environmentally sensitive features and is currently paved. No negative impacts are anticipated in this regard. Positive socio-economic impacts are expected by ensuring that the cold chain is not broken in the form of reduced odour-related incidents on site and improved product quality.
- According to the Marine Specialist, combining the effluent from Outfall A & B will improve dilution of effluent prior to discharge thereby reducing the impact significance (particularly in terms of “Elevated nutrient levels” and “increased suspended solid concentrations”). No negative impacts will result from the combination of effluent.

12. EAP UNDERTAKING

I**, Jenna Theron**, as the Environmental Assessment Practitioner managing this application provide the following affirmation in relation to –

- the correctness of the information provided in the reports;
- the inclusion of comments and inputs from stakeholders and I&APs;
- the inclusion of inputs and recommendations from the specialist reports where relevant;
- any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties.



Signature - Environmental Assessment Practitioner

PHS Consulting

Company

7 October 2026

Date