

COMMENT AND RESPONSES REPORT
AFRO FISHING FISHMEAL & OIL REDUCTION EXPANSION - BASIC ASSESSMENT REPORT

DEA&DP EIA REF: 16/3/3/1/D6/28/0027/19

AEL REF: TBC

PUBLIC PARTICIPATION PROCESS

A Background Information Document (BID) and preliminary Air Quality Impact Assessment was made available for public comment as part of a Pre Application public participation from the **22nd February to 25th March 2019**. All comments received during this period have been collated and included in the report. The comments captured in this table are copied from the original submissions which are included as Annexure F4 of the Basic Assessment Report.

An Application for a Basic Assessment process in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) and the 2014 EIA Regulations was submitted to the Department of Environmental Affairs & Development Planning (DEA&DP) on the 2 August 2019. This application was subsequently withdrawn on the 10th September 2019 due to timeframe constraints associated with the publishing of air quality data from the European air quality specialists. A second Application was submitted to the DEA&DP on 23 October 2019. A Draft Basic Assessment Report (DBAR), inclusive of all specialist studies is being circulated to all registered I&APs for a period of 30 days, extending from **12 November to 12 December 2019**. A public information session and meeting was held on the **20th November 2019** to allow I&APs the opportunity to discuss issues directly the specialist team. Copies of the DBAR were made available as follows:

- * On the Cape EAPrac website;
- * Hard copies will be available at the Mossel Bay Library and Municipal Planning office;
- * Digital copies will be available in CD format at the meeting and on request from Cape EAPrac.

All comments received by this office during have been incorporated into this report and will be submitted to the DEA&DP for decision making.

It must be noted that several comments were submitted in Afrikaans. These have been translated in this report in order to comply with the NEMA EIA Language policy. The original comments received are included in Annexure F4b. Responses provided by Afro Fishing are done so on behalf of Mr Deon van Zyl (Managing Director).

COMMENT / ISSUES	RESPONSES
Shagan - Afro Fishing employee	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Desmond - Afro Fishing employee	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Abrahams, Manie - Department of Health	
Automatically registered as an I&AP.	Registered 22 February 2019
Abrahams, Mushfiqah - Mossel Bay Municipality	

COMMENT / ISSUES		RESPONSES
	Automatically registered as an I&AP.	Registered 22 February 2019
	Attended site meeting with Mr Warren Manuel	6 March 2019
Adam, Alex - Agnodex cc		
	Request registration as an I&AP	Registered 4 October 2019
Andries, Angus - Garden Route District Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Aucamp, Hercu - Beacon Point		
	Registered via email	Registered 19 March 2019
Background Information Document		
	<p>Key concerns with any new fishmeal development in Mossel Bay harbour are unpleasant odours and additional heavy traffic to and from the harbour area that will be in the road right next to my unit causing additional disturbances particularly during the night. Currently the harbour area has a moderate impact on the vicinity, traffic is manageable and unpleasant odours are limited.</p>	<p>Cape EAPrac: Please refer to the specialist Air Quality, Socio-Economic and Traffic Impact Assessments that are included with the Draft BAR. According to these specialists, the impacts are likely to Negligible to Moderate.</p> <p>Afro Fishing: Odours will be managed using the odour abatement methods detailed in the project design and process flow detail. This includes a Regenerative Thermal Oxider (RTO) plant. The RTO plant operates at maximum temperatures of 850°C and will incinerate the particles that cause bad odours. Previously the site was active for the fishing company I&J. Our intention is to continue with fishing and processing activities. The site is also earmarked by TNPA for commercial fishing and processing which allows for such activities. As a direct neighbour you would have bought your unit knowing that the neighbouring section of the harbour was zoned for fishing and industrial purposes.</p>

COMMENT / ISSUES	RESPONSES
<p>Current fish meal production in places such as Hout Bay, Saldanha, St Helena Bay and Mossdustria/Mossel Bay has frequent and continual issues with air quality. These issues are well publicised in the media and no reliable (Or cost efficient?) solution for continual elimination of unpleasant odours have yet been demonstrated. The communities and businesses in the vicinity continue to be plagued by unpleasant odours, albeit with temporary respite on occasion.</p>	<p>Cape EAPrac: The proposed facility will be completely unlike any of the existing fishmeal facilities. There will be no open air offloading or storage of fish, this will happen by means of closed pipes and sumps. The cooking and processing areas will be enclosed, with well designed ducting and building pressure to ensure that the air is circulated to the RTO to burn off molecules that cause nuisance odours. The processes and technology is detailed in the BAR.</p> <p>Afro Fishing: Afro Fishing (AF) intends to install a modern facility using new technology in the form of a Regenerative Thermal Oxidiser (RTO). The odour abatement plan is detailed in the application and the intention is to install a factory that complies with all emission thresholds.</p>
<p>Although CSIR research (http://researchspace.csir.co.za/dspace/handle/10204/448) by De Koning, AJ (http://researchspace.csir.co.za/dspace/bitstream/handle/10204/448/de%20Koning1_2005.pdf?sequence=1&isAllowed=y) mostly focus on improving qualitative production and process, a few key issues can be noted regarding the production of fish meal:</p>	<p>Afro Fishing: The articles referred are well noted and are still valid today. I did meet and work with Dr de Koning many years ago. We note the references to spoilage etc. This article was however written in a time when indirect steam drying and waste heat recovery was not the norm in South Africa. This installation will apply 'best available' fish meal processing technologies and 'best practise' odour abatement systems.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> • Pelagic fish unsuitable for human consumption are caught at night and then brought ashore for processing into fish meal and oil not suitable for human consumption (Animal feed). 	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Certain species of pelagic fish are not suitable for human consumption for several reasons. For example, anchovy is small and oily and not conducive to filleting and processing for human consumption. This type of fish is in abundance in SA waters and therefore harvested for reduction into fish meal and fish oil. Fish meal is sold into the animal feed industry and fish oil mainly used for human consumption. The fish is caught at night because they mainly feed and shoal at night.</p>
<ul style="list-style-type: none"> • The conversion rate for fish into fish meal is 23%, in other words 4.35ton of fish is required for 1ton of fish meal. 	<p>Afro Fishing: About that correct.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> • Spoilage of fish in the delay between catching and processing remains a problem as icing the product aboard ship is not an economically viable option. (Remark: This is an issue especially with catches further offshore and if catch exceeds immediate production capacity – the implication is a load of rotten fish polluting the air and environment) 	<p>Cape EAPrac: The use of Refrigerated Sea Water (RSW) and Chilled Sea Water (CSW) on the boats will ensure that the cold chain is maintained till the boats reach the harbour. This practise is currently in place for the existing cannery already so will not be a new concept. On reaching the harbour, the holds are pumped out, which means the fish stay in the cold water and are not exposed to air which further slows any decomposition. Fish that is kept cold takes longer to decompose and the produce trimethylamine (TMA) which is the odorous compound. Please see the results of various studies on this in the Air Quality Impact Assessment. Once the fish is inside the building, the ventilation system will direct all air via the RTO. TMA is destroyed at around 120°C and as mentioned the RTO will operate at up to 850°C.</p> <p>Afro Fishing: Yes spoilage is the biggest contributing factor to producing odoriferous odours. This plant will however process refrigerated red-eye herring and anchovy preserved with ice. AF will ensure that all fish is caught and processed within 24 hours. Should there be problems, the final step which is a RTO unit, will incinerate any remaining odoriferous odours.</p>
<ul style="list-style-type: none"> • The study mentions issues with quality and research “Since fish meals are made from fish in various stages of spoilage”. (Remark: This is a concern even before production) 	<p>Afro Fishing: This is why the fish must be landed and processed in as short a time as possible. The fish will however be preserved using refrigerated cold water or chilled cold water (using ice) which will reduce spoilage. Very much like a fridge will extend the shelf life of a food product.</p>
<ul style="list-style-type: none"> • Processing spoiled fish inevitably leads to a reduction in the quality of meal and oil and also contributes to air pollution. (Remark: this is an inevitable occurrence and the Hout Bay and Saldanha plants are examples of unpleasant odours) 	<p>Afro Fishing: The Saldanha Bay fish meal plant has closed down. AF however intend to install a RTO plant. This technology has as yet not been applied in SA. It is however used very successfully in many European cities and towns and in other parts of the world.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> • Drying of the fish meal is the vulnerable part of production (Remark: Of concern due to air pollution. Air is used for drying which is ultimately released in the atmosphere.) 	<p>Afro Fishing: The offensive odours are not released during drying. The drying process actually stabilises the product and is the reason why fish meal can be stored safely for years once dried.</p> <p>AF will install indirect steam driers. These are dryers with rotary discs heated by live steam and through the process of conduction the discs heat the wet meal and evaporate off the excess water. Hot water vapour is removed from the dryer and used as the heat source in the liquids evaporation plant. All the water vapour is condensed either in the evaporators or in the water scrubber following evaporation. So essentially air is not the transport medium to remove the water vapour from the dryers. Vacuum and blowers are the driving force. Yes some air will be in the system and this is why the remaining air emitted from the drying process will be incinerated in the RTO unit.</p>
<ul style="list-style-type: none"> • Note: Above indicates some of the inherent risks before and during production which will directly impact Mossel Bay, particularly my unit that is adjacent to the harbour at Beacon Wharf. 	<p>Afro Fishing: This is why an RTO unit will be installed. This is also not going to be a typical West Coast installation. AF will apply processing methods used in fish meal plants situated in European cities and towns.</p>
<p>The Air Quality Impact Assessment http://www.cape-eaprac.co.za/projects/MOS569%20Afro%20Fishing/Air%20Quality%20Impact%20Assessment.pdf done for Afro fishing is comprehensive, but does create a few questions and concerns:</p>	<p>Cape EAPrac: Please note that the Air Quality Impact Assessment included in the Draft BAR has expanded on the issues raised during the Pre Application Public Participation.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> No provision is made for the effect and control of odour from rotten fish arriving at the port or ships waiting outside for unloading. This includes the resultant increase in unpleasant odours, flies and health risks. 	<p>Afro Fishing: No rotten fish will be delivered to this factory. The delivery of rotten fish is not common practise as it is not economically viable and skippers and crew will be dismissed for such practises. It does not happen anywhere in South Africa.</p> <p>LAQS: It must be borne in mind that the current fish canning plant operated by Afro Fishing produces products destined for human consumption. As a result, various control measures are in place to ensure proper hygiene and health standards, including control over the quality of the fish currently being delivered to Afro Fishing. The fish oil that will be produced in the proposed fishmeal plant is also destined for human consumption, with the result that Afro Fishing will extend that current fresh fish quality control procedures to the fish delivered to the fishmeal plant, the main parameter being the temperature at which the fish is delivered to site.</p>
<ul style="list-style-type: none"> Processing time is stated as within 24hours of harvest. This is a risky assumption at best considering that is not always an economical option to keep the catch on ice and distant catches or adverse weather will cause delay in delivery and a spoilt catch. This greatly increases the risk of air pollution. 	<p>Cape EAPrac: According to the Air Quality Impact Assessment, the development of TMA is slowed when the product is kept cold (either by means of ice or refrigeration). Processing time within 24 hours is optimal for the quality of the final protein product, however the studies have shown that TMA can be slowed for up to 100 hours when kept below 5°C. This is also current practise to ensure the quality of the sardines for the cannery which has to reach standards for human consumption. The further design of the facility with the RTO will significantly lower the risks of nuisance odours from the offloading and processing at the fishmeal facility.</p> <p>Afro Fishing: Yes there may an event which will prevent fish being processed within 24 hours, hence the reason for installing the RTO unit.</p>

	COMMENT / ISSUES	RESPONSES
19-Mar-19		<p>LAQS: It is in Afro Fishing's best interest to ensure that the fish is delivered to site as soon as possible as the freshness of the fish has a direct bearing on the quality of the products produced (fishmeal and fish oil). Any unnecessary delay in processing the fish will result in a reduction in the quality of the products produced and its concomitant revenue. As far as odorous emissions are concerned, the age of the fish does not really play a role in the emissions of odorous compounds as the RTO technology is specifically designed to destroy these compounds at high temperatures.</p>
	<ul style="list-style-type: none"> The quoted study of Monique Etienne assumes the catch is kept on ice, the South African climate is more extreme than France which further exacerbates fish spoilage, especially if ice is not used. 	<p>Cape EAPrac: According to the Air Quality Impact Assessment, the development of TMA is slowed when the product is kept cold (either by means of ice or refrigeration). Processing time within 24 hours is optimal for the quality of the final protein product, however the studies have shown that TMA can be slowed for up to 100 hours when kept below 5°C. This is also current practise to ensure the quality of the sardines for the cannery which has to reach standards for human consumption.</p> <p>Afro Fishing: Yes the intention is to land fish either RSW (refrigerated sea water) or CSW (chilled sea water using ice) in order to preserve the quality of the fish and thus reduce the rate of spoilage.</p> <p>LAQS: The chemistry of the formation of trimethyl amine (TMA) shows that it is a function of temperature and time. According to various research articles published on the internet it is generally stated that the TMA formation within the 1st 24 hours is negligible. The rate of formation thereafter is a function of time and the temperature at which the fish is kept.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> The use of condensers, scrubbers and possibly an RTO unit is no guarantee that there will not be detectable and offensive unpleasant odours in the vicinity of the harbour and Central Mossel Bay. The further policing of the air quality and the maintenance of air quality standards are a further concern – this is reinforced by the situation at other fish meal factories currently operating. As stated in the assessment, monitoring air quality is a costly concern and one of the first considerations in cutting costs. 	<p>Cape EAPrac: The Garden Route District Municipality will conduct a baseline odour screening at the harbour. This will provide a starting point to identify in future, any potential problems and their origins. The proposed facility will implement the Best Available Technology to ensure that their impact on the air quality at the port complies with all relevant requirements. Please also note that the other fishmeal facility to which you refer has recently had their license revoked for non compliance. Thus it is a priority of Afro Fishing to ensure that this facility is designed, built and operated at the highest standards.</p> <p>Afro Fishing: The harbour and specifically the area zoned for fishing activity is always going to smell like a harbour. Tourists visit working harbours to see fishing trawlers, fish being processed and to experience the harbour feel.</p> <p>LAQS: There are various differences between the "other" fishmeal plant and the one proposed by Afro Fishing. Firstly, the technology used by the other plant was old and very little provision was made for the prevention and/or reduction of odorous emissions. Secondly, the fish product processed by the other plant was never fresh as some of the waste originated somewhere distant and was transported to site by road. Thirdly, the other plant did not only process fish waste, but also various other waste products from, e.g., abattoirs.</p> <p>Other fishmeal factories are all located along the west coast and none of them use RTO technology, but rely on chemical scrubbers which are not as efficient as RTO units. Incidentally, there is no consideration of "possibly using an RTO"; it is an essential component in the planned factory.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> The conclusion of the author (p53) emphasises the requirement for ideal conditions to be met regarding the delivery and processing of the catch as well as the maintenance of equipment, processes and air quality standards. There is doubt and concern if these ideal conditions can be maintained throughout to the required standards 100% of the time. 	<p>Afro Fishing: In order to achieve top prices for fish meal and fish oil, fresh fish must be processed. This is the same driver for reduced odour emissions so it is in our interests to maintain standards 100% of the time. The RTO plant has a successful history in similar situations and we intend for this to become the new standard for fishmeal facilities.</p> <p>LAQS: Cognisance must be taken of the fact that Afro Fishing's proposed fishmeal plant is highly unlikely to operate 100% of the time as the availability of fish for processing is subject to seasonal variations. It is expected that the plant will run at full capacity for 4 to 8 weeks per year after which it will operate at reduced capacity and only whenever fresh fish is available. Due to the fishing permitting system applied by the Government, no fish processing will be carried out from mid-December to mid-January.</p>
<ul style="list-style-type: none"> How does the study take into account adverse weather conditions, the seasonal offshore wind direction and changing weather patterns due to climate change? 	<p>Afro Fishing: Fishermen have been fishing for centuries and understand how these factors influence their catch and what they will be paid. These factors will not effect the operation of the factory and the RTO unit.</p> <p>LAQS: The air quality impact assessment uses an extensive set of weather parameters as part of the dispersion modelling study. At least 3 years' hourly data is used, as is prescribed in the Regulating Regarding Air Dispersion Modelling as published in Government notice R.533 of 11 July 2014. Hourly data is specifically used as it covers all weather conditions that occur in the area for the period of 3 years, including adverse conditions, on- and offshore winds, poor dispersion conditions, hourly temperature variations, good dispersion conditions, etc.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> The storage of fish meal is less than 100 meters from my residential unit. It is highly likely that fish meal odours will be detectable at that distance and further, I refer the occasional odours from Seal Island. 	<p>Afro Fishing: Fish meal is stored in polypropylene bags so the product is sealed. Fish meal anyhow is a stable product and does not deteriorate. There will be no offensive odours emitted from a warehouse.</p> <p>LAQS: There are other sources of odours in the area, notably a sewage pump station, which already generate odours, but the public in general either seems to have grown accustomed to it, or are ignoring it.</p>
<p>I am a resident in the area and my residence is located approximately 800m from the proposed fish oil and fish meal factory and approximately 200m from the proposed fish meal warehouse. It is highly probable that there will be a direct unpleasant odour impact in such a close area. Beacon Wharf, Beacon Point, Point Village, Point Hotel with tourist related activities and other residential units along the Point and further will be directly impacted.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. There are other sources of odours in the area, notably a sewage pump station, which already generate odours, but the public in general either seems to have grown accustomed to it, or are ignoring it.</p> <p>Afro Fishing: Fish meal is stored in polypropylene bags so the product is sealed. Fish meal anyhow is a stable product and does not deteriorate. There will be no offensive odours emitted from a warehouse.</p> <p>Cape EAPrac: Agrees with both these statements.</p>

COMMENT / ISSUES	RESPONSES
<p>Any unpleasant odours, noise and other pollutants as well as additional traffic will thus have a direct impact on me and my family in terms of the following:</p> <ul style="list-style-type: none"> • Health, • Quality of life, • Property value and the investment made in the property. This is a residential and tourist area I have invested a substantial amount in the property. Adverse conditions will result in a devaluation of all properties in the mainly tourist area. • Ambient and security of the area. Additional traffic and the circulation of personnel will pose an additional risk in terms of security and safety. 	<p>Cape EAPrac: Please refer to the specialist Air Quality, Socio-Economic and Traffic Impact Assessments that are included with the Draft BAR. According to these specialists, the impacts are likely to Negligible to Moderate.</p> <p>Afro Fishing: The area to be used by the project is zoned for fishing and has always been used for fishing activities. There is therefore no change in the activity. These factors have always been present and were as such when you bought your property.</p> <p>Fishing sector investment and the resulting employment should therefore not be prevented when municipal land use, planning and zoning schemes are abided by.</p>
<p>The area directly adjacent to the harbour area includes the Beacon Point and Beacon Wharf residential complexes as well as other residential and tourist areas such as restaurants, hotels and businesses. Any adverse conditions such as bad odours will affect other residents as well as businesses, resulting in loss of tourism, revenue and ultimately employment. This loss will be in excess of any jobs or revenue created by this project and a deterrent to possible future developments such as the proposed Mossel Bay Waterfront and other.</p>	<p>MPBS: Afro Fishing have introduced measures and mechanisms to mitigate the risk of odours. The process even from a socio-economic perspective is intended to highlight and determine what mitigation is required in anticipation of future risks.</p> <p>Afro Fishing: This is the situation throughout the world. Industry, commercial and residentially zoned areas neighbour one another as defined by the local municipal precinct guidelines. We are not changing any of this. With regards the Waterfront, the Quay 4 side of the harbour has been allocated for this activity. According to the Portnet and Municipal precinct plan, the Quay 1 side of the harbour remains allocated to fishing activities as this is a working harbour.</p>
<p>Even though some of above points above illustrate the impact on third parties, it has a direct impact on every resident, business owner and employee in the harbour area and vicinity. Any negative impact such as polluted air or environment, will eventually negatively impact the revenue of businesses and Mossel Bay Municipality, leading to less revenue, jobs, service delivery and ultimately less development and opportunities in developing and needy areas.</p>	<p>MPBS: The rating of the odour impacts as Very Low due to the implementation of the RTO will only highlight the positive benefits of the proposal to the area.</p> <p>Afro Fishing: Air pollution will be managed with odour abatement equipment as already described. There will be no negative impact on the Mossel Bay economy.</p>
<p>Baartman, Errol - TNPA</p>	

COMMENT / ISSUES		RESPONSES
	Automatically registered as an I&AP.	Registered 22 February 2019
Bacon, Craig - Viking Fisheries		
	Automatically registered as an I&AP.	Registered 22 February 2019
Baker, Friedl - Eden Labour Forum		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Barnard, Mervyn - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Barnard, Mia - Private		
	Registered as I&AP on receipt of email	Registered 6 December 2019
Draft Basic Assessment		
	<p>We've received correspondence with regards to the new fishmeal factory planned for Mossel Bay.</p> <p>If I understand correctly we must raise our concerns before 12 December.</p> <p>I am not sure where is the correct platform to do so, maybe you can put me on the right track.</p> <p>But as you are doing the environmental impact assessment, I was hoping you could possibly assist me with my concerns</p>	<p>Cape EAPrac:</p> <p>Thank you for your email. I have registered you as an I&AP to ensure that you receive all future correspondence.</p>
	<p>I can see that advanced technology are planned for this factory, with focus on reducing the smell of emissions.</p> <p>I can understand it could possibly be technically achieved.</p>	<p>Cape EAPrac:</p> <p>That is correct. The implementation of the RTO system will ensure that no discernable odour will be found outside of the building. The technology has proved very successful in very similar facilities in Europe and there is no doubt that it can be implemented successfully at Afro Fishing.</p>

COMMENT / ISSUES		RESPONSES
<p>I also understand the need for new jobs in the area, although its seasonal.</p>	<p>Afro Fishing: South Africa is on the precipice of been rated “junk” status by international ratings agencies due to burgeoning debt, high unemployment and no growth. Providing the odours can be managed, an investment of this nature and the employment opportunities it will provide should not be ignored by the approving authorities. There are not many other investments on the horizon plus there is the threat of PetroSA retrenching 1500 employees at the end of 2020.</p> <p>The current cannery and the new venture will employ both permanent and seasonal workers. The permanent staff will be employed for 52 weeks and the seasonal workers when fish is processed as is the situation in the fishing sector, in the agricultural sector and many other sectors in SA.</p>	
<p>06-Dec-19</p> <p>But unfortunately, I must raise concern for the sustainability of fish stocks in the coastal vicinity of Mossel Bay. Have this been investigated? Is that not the reason for the closure of I&J in the first place?</p>	<p>Cape EAPrac: Yes, the sustainability of fish stocks has been investigated as part of the national fisheries management. The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so.</p> <p>I&J was not fishing for the same species that Afro Fishing requires for the fishmeal and fish oil. There were also other contributing factors to their closure that was not related to availability of fish.</p> <p>Afro Fishing: The fish stocks are scientifically and sustainably managed by the Dept of Fisheries. The 'operating managing programmes' in place do not allow for the over fishing of fish species. I&J disinvested from Mossel Bay because of pressure by activists and the lack of support by the authorities. I quote the I&J MD at the time when I say this. For some reason, the community was led to believe that aquaculture is a bad industry. I&J wanted to grow their business by investing in aquaculture projects. They now do this elsewhere.</p>	

COMMENT / ISSUES		RESPONSES
	<p>We've already put so much strain on the seabirds and other sea life in this area. For example, in the short period of 12 years I've been staying here I can see the yearly reduction in the numbers of cormorants.</p> <p>For this reason I will definitely be opposed to further development of this fish factory.</p> <p>It will just put further strain on the environment.</p> <p>We as the public rely on people like you to protect the environment.</p>	<p>Cape EAPrac: Part of the fisheries management strategies is the protection of areas where bird breeding colonies are located. In these areas fishing is prohibited in order to ensure that there is sufficient prey stock available. This strategy also forms part of the process of providing for the Total Allowable Catch (TAC) which is allocated and monitored on a bi-annual basis.</p> <p>Afro Fishing: The bird life activity is low at the moment due to the current low levels of productivity in the Benguela and Agulhas eco-systems. This is due to environmental factors. It is for this reason that the pilchard TAC is low and maybe an explanation for the reduced shark activity, low penguin population and the many other observations currently being made. Investments like this are however not made on short term observations and data but more on the longer term cycles of these eco-systems. Historically, pelagic specie surveys have shown that a fishery can recover within months of low production periods.</p>
Barnard, Morne		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
	Please note: This comment was translated from Afrikaans. Please see the original comment in the Basic Assessment Report Appendices	
25-Mar-19	The Garden Route District Municipality and Mossel Bay Municipality must be investigated for irregularities in issuing of licenses.	Cape EAPrac: The investigation of authorities falls outside of the scope of this Environmental Impact Assessment process.
	Double standards being applied by the authorities.	Cape EAPrac: Concerns regarding double standards on the part of the authority should be taken up with them directly or via any other mandated watchdog authority.
Barrat, Helena - Status Mark		
	Registered via email	Registered 25 February 2019
Barry, Danie - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		

COMMENT / ISSUES	RESPONSES
<p>I wish to make further objections to the Environmental Impact Assessment that was done for Afro Fishing for the establishment of a fishmeal and fish oil facility in the Port of Mossel Bay.</p>	
<p>1. No Marine Impact Assessment was done to determine the more than five times higher discharge on the sea life in the Mosselbay bay. The increased nitrogen rich (increased protein) discharge will likely lead to an increase in fungal growth and other harmful micro-organisms in the sea which will result in the decrease of oxygen in the seawater. Red tides can develop with detrimental effect on the entire bay of Mossel Bay. A thorough scientific study of the marine life and negative impacts of the five times increase in discharge must be done before there is any consideration of the Afro Fishing development in the Port of Mossel Bay.</p>	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal. In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p>
<p>2. The increase in heavy vehicles that will be used by the proposed facility will damage Mossel Bay's streets within months. This will be due to the increased traffic to and from the facility. The local taxpayers will end up being responsible for the repair and maintenance of the roads. There is no place in Mossel Bay with its narrow streets an access route that can accommodate this kind of increased heavy traffic.</p>	<p>Afro Fishing: The Traffic Impact Study has shown that there will be a LOW impact on the roads by this investment. Once the Port of Mossel Bay has been upgraded to a functional import/export port with shipping lines docking in Mossel Bay, there will be no need to transport product from Mossel Bay to other nearby shipping ports via road transport. All the product will be exported in containers. The factory will also not be operational during the Dec/Jan holiday period so no trucks will be on the roads during this busy tourist period.</p> <p>Urban Engineering Road pavements are designed according to an equivalent E80 axle load. The actual maximum vehicle axle load is governed by legislation. No vehicles are allowed to exceed the maximum axle load used in the structural design of the road pavement.</p>

COMMENT / ISSUES	RESPONSES
<p>3. I would like to seriously object to the misrepresentations that were made during the meeting in the town hall by the CEO of Afro Fishing. Hout Bay's fishmeal plant, which was managed by this same CEO, has had to be closed as a result of the pressure from the public due to the unbearable odour from the facility. The Afro Fishing CEO claims that there is a good balance and relations between tourism and the Hout Bay fishmeal plant, all the while knowing the plant has already been shut down.</p>	<p>Afro Fishing (Deon van Zyl): In the years that I managed Hout Bay, the factory was firstly able to process 1000t.p.d of raw fish. The factory also had different technology to what was installed after my time. Under my management we installed a low temperature air dryer and still used presses to separate liquid from solid phase. During those years we had no more than 10-20 complaints p.a. and the majority of those were from one person. He would even complain when the factory was not operational. Since then the capacity was drastically reduced, the low temperature dryer was de-commissioned, some plant was removed and they reverted to Hiller technology to separate liquids from the solids. The strategy of the group was always to shut down the Hout Bay plant and they tried to do this for several years. Due to labour pressures this was however not possible. The result was the Group idled along with a low throughput plant until they were able to deploy all the labour elsewhere. During this time period there was obviously no investment in the Hout Bay plant. I cannot vouch for the level of complaints and the problems experienced during those years as I was employed elsewhere.</p> <p>However, the above explanation is superfluous as we are not comparing 'apples with apples'. Hout Bay had no RTO plant to remove odours. Mossel Bay will be a new plant and not a limping relic (as Hout Bay was in its later years of operation) and will have 'best proven' odour abatement technology with the RTO system. There is therefore no 'misrepresentation' as stated.</p>
<p>4. The fishmeal plant in the Cape Town waterfront does not handle more than 120 tons of product per day, whilst Afro Fishing is proposing 1000 tons or more. This is nearly 10x the amount processed at the Waterfront. And yet still the "good relationship) between the Waterfront and the fishmeal facility is used as an example of how it could work in Mossel Bay. I am of the opinion that the Cape Town Waterfront would not exist or be developed due to the terrible odour of a fishmeal plant.</p>	<p>Afro Fishing: When it comes to fish meal plants, size is not important. You can have a 10 t.p.d. plant which can produce more offensive odours than a 1000 t.p.d. plant. It comes down to the freshness of the fish, raw material type, the operating disciplines and the odour abatement technology. The offensive odours (TMA's) are like stink bombs. A minute amount can pollute an entire hall.</p> <p>The RTO plant to be installed will be sized on 1000 t.p.d. processing ability and not 120 t.p.d.</p>

9/03/25

	COMMENT / ISSUES	RESPONSES
201	<p>5. No real or scientific Air Quality tests have been done by the EIA person and all the information on air flow rests on assumptions. At no time was the great increase of more than five times daily volume of production taken into account.</p>	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to estimate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create a worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>
	<p>6. No or minimal contact between the EIA specialist and the applicant of the EIA, as well as the interested parties is allowed, in order to protect the independence, truth and impartiality of the report. This has clearly not taken place with Cape EAPrac, given that EAPrac personnel were taken on an investigative trip to Portugal and Spain.</p>	<p>Cape EAPrac: The project team is made up of a respected group of professionals who are required to work together and with the applicant in order to ensure that the final reports comply with all legislative requirements, and also reach a Best Practicable Option for the proposal. This statement is inherently incorrect in that interaction between all parties ensures due diligence. Furthermore, the inclusion of the Cape EAPrac personnel to investigate conditions of existing facilities ensured that the correct questions were asked of the overseas owners. It also allowed the practitioner to compare the requirements of the EU legislation and how the overseas facility implemented various protocols for the management of odour.</p> <p>LAQS: LAQS does not agree with this statement. It is of extreme importance that ALL parties participating in the assessment of the impact of any development maintains close contact with the applicant so that any and all uncertainties that arise during the assessment steps are clarified, alternative options are evaluated, correct data is processed, etc.</p>

COMMENT / ISSUES	RESPONSES
<p>7. The cut off date of 12 December 2019 for the submission of comment is too short and is unacceptable. I therefore insist that the comment period should be postponed until the "fish rot" investigation in Namibia has been fully investigated and dealt with at which time objections should still be submitted as the application and the outcome will have material influence on the fishmeal facility in Mossel Bay.</p>	<p>Cape EAPrac: Please note that this proposal has been advertised and circulated to the public since February 2019. The comment period on the Draft Basic Assessment Report of 12 November to 12 December is part of the legislated timeframes provided by the NEMA EIA Regulations. The application process follows prescribed statutory timeframes based on the proposal presented. It must be noted Afro Fishing does not will be applying for any fish quotas and the application at hand is for the construction of the facility in the Port of Mossel Bay.</p> <p>Afro Fishing (Deon van Zyl): The "fish rot" scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p> <p>The department officials anyhow have 112 days to record a decision regarding this application, so there is plenty of time for DEADP to determine for themselves whether Afro Fishing is linked to Iceland and corrupt Namibian officials.</p>
<p>Public Meeting / Information Session</p>	

COMMENT / ISSUES	RESPONSES
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	
<p>I would like to object certain misrepresentations that were made by the speakers at the meeting in the town hall on Wednesday evening. It was included in the questions that were put to the panel but were not all addressed by the speakers. The concerns are as follows:</p>	
<p>1. Hout Bay was used as a model where tourism and the fishmeal facilities work side by side and that both provide for employment opportunities. The truth is that the fishmeal plant at Hout Bay is about to close down and production has been halted, due to, amongst other reasons, pressure from the public due to the terrible odours generated by the plant.</p>	<p>Afro Fishing (Deon van Zyl):</p> <p>In the years that I managed Hout Bay, the factory was firstly able to process 1000t.p.d of raw fish. The factory also had different technology to what was installed after my time. Under my management we installed a low temperature air dryer and still used presses to separate liquid from solid phase. During those years we had no more than 10-20 complaints p.a. and the majority of those were from one person. He would even complain when the factory was not operational. Since then the capacity was drastically reduced, the low temperature dryer was de-commissioned, some plant was removed and they reverted to Hiller technology to separate liquids from the solids. The strategy of the group was always to shut down the Hout Bay plant and they tried to do this for several years. Due to labour pressures this was however not possible. The result was the Group idled along with a low throughput plant until they were able to deploy all the labour elsewhere. During this time period there was obviously no investment in the Hout Bay plant. I cannot vouch for the level of complaints and the problems experienced during those years as I was employed elsewhere.</p> <p>However, the above explanation is superfluous as we are not comparing 'apples with apples'. Hout Bay had no RTO plant to remove odours. Mossel Bay will be a new plant and not a limping relic (as Hout Bay was in its later years of operation) and will have 'best proven' odour abatement technology with the RTO system. There is therefore no 'misrepresentation' as stated.</p>

COMMENT / ISSUES		RESPONSES
22-Nov-19	<p>2. The CEO of Afro Fishing mentioned that they have never received complaints regarding noise. That is a gross untruth. The Body Corporate of Beacon Wharf has laid multiple written complaints regarding the noise made by taxis in the middle of the night at the security gates. The noise includes slamming doors, hooters and people shouting.</p>	<p>Cape EAPrac: Please advise as to whom you submitted these complaints. Please also note that Afro Fishing staff do not access the facility via the security gates near Beacon Wharf. In the event that the facility is authorised, Afro Fishing must provide for noise management during shift changes.</p> <p>Afro Fishing: Unfortunately, there are no complaints on record. The previous owner of Afro Fishing relates one incident where there was a breakdown and the some staff started playing soccer. They were immediately stopped. The noises referred to can be mitigated but are actually no different to those coming from Marsh street when the pubs and restaurants are busy.</p>
	<p>3. Heavy vehicles that use air brakes are often on the road, even at night at the security gate with great noise that will only get worse with increased production at the facility.</p>	<p>Afro Fishing: Air brakes can be managed. There will however be no trucks arriving at the factory delivering fish for the fish meal plant. All the fish will be received by fishing vessel and via the harbour. Please note that there are many other commercial operations that rely on truck and road transport in Mossel Bay.</p>

COMMENT / ISSUES	RESPONSES
<p>4. No Marine Impact Assessment has been done to date. Is a Marine Impact Assessment going to be done in the future, which must especially take into account the polluted water going into the sea that will increase significantly?</p>	<p>Cape EAPrac: No, no Marine Impact Assessment has been undertaken for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Afro Fishing: As noted above there are other laws pertaining to water discharge and the impact on the oceans. Afro Fishing has the necessary permits in this regards and complies with this legislation.</p>
Registration	
Please accept my details for registration as an I&AP.	

COMMENT / ISSUES		RESPONSES
20-Nov-19	<p>One of the big concerns in the establishment of the fish meal factory is also the transportation issue for handling of products and by-products of 1 000 tons of fresh fish daily, which will generate about 800 tons of products daily. If distribution of the products will be by road, it means that about 40 large 20-ton trucks will visit the facility daily. At the present moment, the production is a fraction of the intended goal, although the transport of heavy vehicles causes loud noise pollution when they drive steeply down Kloof street towards the harbour.</p>	<p>Afro Fishing: Please note the figures quoted in the Traffic Impact Study and the assessment that there will be LOW traffic impact. Some of your facts are incorrect as 1000 tons will not produce 800 tons of product. 1000 tons will at most produce 250 tons of product. If 30,000 tons of raw fish is processed annually this will translate to one truck per day.</p> <p>Please note that the loading of vehicles will be a day shift activity so no noise is anticipated at night.</p> <p>Please note that once the Port of Mossel Bay has been upgraded to a functional import/export port with shipping lines docking in Mossel Bay, there will be no need to transport product from Mossel Bay to other nearby shipping ports via road transport. All the product will be exported in containers direct from the Port of Mossel Bay.</p> <p>Urban Engineering Please refer to the Traffic Investigation for more details regarding trip generation. The anticipated noise pollution levels are deemed acceptable for a facility that is located within a working harbour.</p>
	<p>The same holds true for taxis transporting employees (of which the number will more than double after completion of the new facility) and stops next to the Beacon Wharf apartments, also during hours of the night. Shouting, hooting of taxi horns and engine sounds cause a great deal of sound pollution for owners at Beacon Wharf.</p>	<p>Afro Fishing: The noises referred to can be mitigated but are actually no different to those coming from Marsh street when the pubs and restaurants are busy.</p> <p>Urban Engineering Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility is located within a working harbour.</p>
Bartman, Sue - Huckle Street, Mossel Bay		
	Registered via email	Registered 23 March 2019
Background Information Document		

COMMENT / ISSUES		RESPONSES
23-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp.	Please see responses as provided to Mr Aucamp
Bartman, Fryatt - Huckle Street, Mossel Bay		
	Registered via email	Registered 19 March 2019
Background Information Document		
19-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp.	Please see responses as provided to Mr Aucamp
Beaumont, Celia - Private		
	Registered via email	Registered 28 February 2019
Background Information Document		
28-Feb-19	Increased activity to fishing	<p>Afro Fishing: Annual fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There is therefore no increase in activity unless the resource allows for it and not just the building of a new factory.</p>
	The destruction of Mossel Bay as a residential area because of the factory smell	<p>Cape EAPrac: According to the Air Quality Impact Assessment, the development of TMA is slowed when the product is kept cold (either by means of ice or refrigeration). Processing time within 24 hours is optimal for the quality of the final protein product, however the studies have shown that TMA can be slowed for up to 100 hours when kept below 5°C. This is also current practise to ensure the quality of the sardines for the cannery which has to reach standards for human consumption. The further design of the facility with the RTO will significantly lower the risks of nuisance odours from the offloading and processing at the fishmeal facility.</p> <p>Afro Fishing: Smell will be controlled as already described.</p>

COMMENT / ISSUES		RESPONSES
	My interest is that we preserve the value of what we have in our marine life and in our town's society and community.	Afro Fishing: Correct, and hence why sustainable fishing is a core value of Afro Fishing and the Department of Agriculture, Forestry and Fishing who are the custodians of what is harvested from the seas.
	The only plus is job creation - and we are quite capable of innovatively creating jobs in environmentally friendly and constructive ways that enhance and improve life on earth rather than destroying it.	Cape EAPrac: The introduction of technology that will in all likelihood become the Best Available Technology in a contentious industry should also be seen as an important aspect. It sets aside the port of Mossel Bay as an innovative hub. Afro Fishing: The jobs that will be created will be based on doing so with the absolute minimum harm to the environment. This is why certain technologies and disciplines will be applied.
Bekko, Ieptieshaam - DEA&DP Coastal Management		
	Automatically registered as an I&AP.	Registered 22 February 2019
Bendle, Sam - Garden Route District Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Background Information Document		
25-Feb-19	Note is taken of the proposed fish meal and oil reduction facility. Comments will follow as soon as the EIA report is available.	
Bili, Anelisa- DEA Oceans & Coasts		
	Automatically registered as an I&AP.	Registered 29 October 2019
Black, Dirk - Private		
	Registered via email	Registered 27 February 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>Offensive odours - no odours can and will be guaranteed.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>AfroFishing: A zero odour scenario can never be guaranteed. We can however ensure that the technology and disciplines applied are best practises and the odour emitted in compliance with allowed thresholds etc.</p> <p>LAQS: The only way to ensure zero industrial air pollution is to have zero industries. This, however, is not feasible and the best way then is to ensure that emissions do not impact negatively on the area. Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community. Please see the Air Quality Impact Assessment showing the estimated dispersion.</p>
<p>Smoke and steam visually impairs the tourists / residents and potential home buyers perception of the town.</p>	<p>LAQS: Visible smoke emissions from Afro Fishing's current operation occur mainly during boiler start-ups and this usually occur early in the morning. Apart from boiler start-up operations, no other visible sources of emissions are envisaged.</p> <p>Afro Fishing: Currently the cannery emits smoke and steam and this has had no consequence on the local environment. These are signs of a working harbour. Similar to the emissions from cars and your local restaurant.</p>

	COMMENT / ISSUES	RESPONSES
27-Feb-19	<p>Increased effluent - especially organic fishy waste - will increase the presence of sharks and affect the angling, surfing and swimmers.</p>	<p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility.</p> <p>Afro Fishing: An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p>
27-Feb-19	<p>The town is NOT an industrial hub - but a tourist, holiday, property investment and retirement retreat.</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a "strategic harbour" located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Afro Fishing: Please acquaint yourself with local Portnet and Municipal precinct and development planning for the area. Industrial/commercial zoned activities are very much part of this plan. However it is the responsibility of businesses not to negatively impact local heritage or tourism.</p>

COMMENT / ISSUES	RESPONSES
<p>I live in close proximity to the harbour. I own several investment properties in the CBD that forms part of my income / pension. I swim and fish in the bay on a regular basis.</p>	<p>MPBS: Afro Fishing have introduced measures and mechanisms to mitigate the risk of odours. The process even from a socio-economic perspective is intended to highlight and determine what mitigation is required in anticipation of future risks.</p> <p>Afro Fishing: You will not be negatively affected by this project. In fact, the increased employment and increased local procurement will support the local economy and your businesses.</p>
<p>Mosdustria is specially designed to provide space and industrial facilities for exactly</p>	<p>Afro Fishing: Fishing activities rely on boats landing fish in safe harbours where they can be offloaded and processed as soon as possible. This will unfortunately not be possible in Mosdustria.</p>
<p>Why would any town have a dedicated industrial area and then transform their lovely coastal town into a smelly factory?</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Afro Fishing: The harbour was probably how this town began. It remains an integral asset of Mossel Bay and without it the gas and oil industry would probably not exist nor any of the other harbour related activities like fishing. The harbour is also key for the tourism industry and small craft activities. This harbour may in future even allow passenger liners to dock and part of it will be developed into a Waterfront.</p>
Blanckenberg, Trudie - Private	
Registered via email	Registered 27 February 2019
Background Information Document	

COMMENT / ISSUES		RESPONSES
27-Feb-19	Please provide the company registration no of Afro Fishing. It was omitted on the BID.	Cape EAPrac: Please be advised that the process is currently in a Pre Application phase and the BID has been circulated to initiate public participation regarding the proposal. It is not a requirement to include the company registration in a BID at this stage, however for your information it is 1998/016485/07.
	Planning Context (BID): Please clarify what is meant by "require consent use and other planning approval". Does that include rezoning?	Cape EAPrac: In terms of the planning approvals, the harbour precinct is owned and managed by the Transnet National Ports Authority (TNPA) as a single cadastral unit. The zoning for the property is Transport I. Each operator within the harbour has lease agreements with TNPA and does not own the land. In order for the various operations within the property to operate legally, some have to apply for consent use. This could be Industrial, Commercial, Tourism etc., depending on the type of land use being undertaken. In this case, an Air Emissions License can only be issued to properties that have an Industrial III consent use and as such the applicant will have to apply for such use. No rezoning will be applied for as the property as a whole has to remain Transport I as it is a harbour precinct.
Booisen, Niklaas - Mossel Bay Municipality		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Booyesen, Nicolaas - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Boshoff, Tiaan - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Bosman, Hester - Mossel Bay Backpackers		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		
	Here are my genuine objections to the proposed fishmeal factory in Mossel Bay harbour.	Cape EAPrac: Thank you for your registration. The link to the Draft Basic Assessment Report was included in the response to your initial email.

COMMENT / ISSUES	RESPONSES
<p>As we have been running a major tourist accommodation business for the last 30 years 200 meters from the harbour, it is my real concern how it can work?</p>	
<p>1. A factory operating 24 hours a day. What about the noise factor?</p>	<p>Cape EAPrac: Please note that the factory is expected to operate approximately 180 days of the year and not necessarily for 24 hours a day. The Air Quality specialist considered various models, including an option where the plant is operational for 24 hours a day, 364 days a week as is required to determine worst case scenarios. The facility will specifically not operate from mid December to mid January due to the quota allocations and industry norms. In terms of noise, all machinery will be indoors with noise reduction built into the design. Other noise associated with the plant will be associated with normal operations currently.</p> <p>Afro Fishing: The noise level of the new fish meal plant will be less than that of the current cannery operation. The building will also be a sealed unit preventing the even lower level of noise to dissipate. The factory will be located in the designated fishing area of the port where industrial activities are approved.</p>

COMMENT / ISSUES	RESPONSES
<p>2. Production / processing of fish meal and related products stinks. Not just a little, but a lot. The fishmeal facility in Mossdustria had to close down because of the odours. How then will it work here? Filters are expensive and must be maintained. There is no guarantee.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The impact rating has been confirmed to be Very Low and is unlikely to be detected outside of the building. There is no comparison between Afro Fishing's planned operations and the other fishmeal plant that is referred to. The main differences are: Firstly, the technology used by the other plant was old and very little provision was made for the prevention and/or reduction of odorous emissions. Secondly, the fish product processed by the other plant was never fresh as some of the waste originated somewhere distant and was transported to site by road. Thirdly, the other plant did not only process fish waste, but also various other waste products from, e.g., abattoirs.</p> <p>AfroFishing: A zero odour scenario can never be guaranteed. Currently, amines, CO, SO2, H2S, NO2, PM's and other emissions are already in the atmosphere within the harbour and surroundings as determined by baseline air monitoring performed in 2019. We can however ensure that the technology and disciplines applied are best practises and the odour emitted in compliance with allowed thresholds etc.</p> <p>Of importance, this plant will process fresh fish with low histamine and TVBN levels. This is not an offal processing facility like the one that closed down in Mossdustria. That factory processing carcasses and raw material that stood in its yard for several days.</p> <p>Cape EAPrac: The concern regarding odour has led to the proposal being presented. The use of the RTO will be non-negotiable for any license issued, as well as the requirements for filters, scrubbers and the maintenance of all machinery. Non compliance of licenses may lead to the retraction of such license, as was the case with the fishmeal facility in Mossdustria.</p>

COMMENT / ISSUES	RESPONSES
<p>3. Is the land in question on Portnet or Municipal land? - who's going to stand when something goes wrong?</p>	<p>Cape EAPrac: The land belongs to the Transnet National Ports Authority and is leased to Afro Fishing. The responsibility rests with Afro Fishing and any license issued to them will be binding.</p> <p>Afro Fishing: Afro Fishing is making the investment and Afro Fishing requires the necessary permissions to build and operate such a factory. Afro Fishing will therefore be the responsible party.</p>
<p>4. What assurance is there that residues / oil / discharge water will not end up in the sea and pollute the port / surrounding Santos?</p>	<p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to include any requirements for the increase in volume of seawater needed for the fishmeal facility. Non compliance of licenses may lead to the retraction of such license.</p>
<p>5. Has the Environmental Impact Assessment been done and where can it be viewed?</p>	<p>Cape EAPrac: Yes, an EIA is currently underway and the Draft Basic Assessment Report has been available for review. A link to the reports was provided to you with your initial email. Furthermore the reports have been available at the Mossel Bay Library, Mossel Bay Municipality and on request in the form of a CD.</p>

COMMENT / ISSUES	RESPONSES
<p>10-Dec-19</p> <p>6. It doesn't help the public being inundated with scientific technical facts and evidence, the fact of the matter is, is it going to be noisy and stink? And that seems to be to me a useless questions - a factory is noisy and messy, it is after all a factory. That's why there are municipal zoning.</p>	<p>Cape EAPrac: It is a facility being located in an area determined for commercial fishing industries in a working harbour. The scientific and technical facts are crucial for the assessment and to determine the potential impacts. There has been a lot of provision to provide the details that can be easily understood by the public. As has been previously said by the air quality specialist, there will be no discernable smell outside of the building on the quay.</p> <p>LAQS: It is not possible to ignore the science underlying the process. Doing so will result in a totally uncontrollable situation where nothing is fit for purpose.</p> <p>Afro Fishing: Just because a local journalist says that the factory will be noisy and stink does not mean this is true. This 'fake news' seems to be preventing I&AP's from objectively sifting through the various impact studies and reports and ascertaining for themselves whether the factory will be noisy and stink. This is the whole idea behind investing in 'best proven' technology and not in another West Coast type installation. We are building a factory that will not be messy and will not stink. Please see the detail describing how this will be achieved in the various impact studies and BAR application.</p>

COMMENT / ISSUES	RESPONSES
	<p>DELplan: The current zoning of Erf 12459, Mossel Bay is Transport Zone I: Transport Use ,however historically, Erf 12459, Mossel Bay always had industrial rights since factories were developed on the subject property over the years. Therefore, the Port of Mossel Bay has footprint Industry rights that are restricted to their current footprint of the industrial buildings.</p> <p>Transport Zone I has a secondary right, namely Industry. Thus, we are applying for a consent use application which will expand the current footprint and will only be applicable to that specific part Quay 4 . The rest of the property will remain as Transport Zone I: Transport Use. The definition of Industry explains that the zoning is associated with a factory but that it does not include a noxious trade or risk activity. The Air Quality Impact Assessment has determine that the proposed development will not be noxious nor will it be a risk activity.</p>

COMMENT / ISSUES	RESPONSES
<p>7. The idea to develop the harbour area into a more tourist friendly "Waterfront" is destroyed by this proposal. Its as simple as that.</p>	<p>Cape EAPrac: That is not the case. The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDPF and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
	<p>DELplan: This argument can be regarded as invalid and inaccurate since the TNPA, the IDP and SDF of Mossel Bay Municipality supports the further development of the port. The IDP stipulates that Mossel Bay Municipality supports the harbour development project to its fullest. A CBD and harbour development precinct plan have been adopted in 2013. The Transnet National Ports Authority has approved the proposed harbour developed and is currently soliciting input from all stakeholders through the process of expressions of interest.</p> <p>The Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES		RESPONSES
	Is there really one worthy reason why this factory should happen in the heart of a beloved tourism village? And understand me well, I'm not against development - by no means. But there are place / zonings for factories and a place / zonings for housing and tourism.	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows:</p> <ul style="list-style-type: none"> - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustrya by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater. <p>The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p>
	I believe this sensitive village-changing event will have to be stepped up much more	<p>Cape EAPrac: Thank you for your involvement in the EIA process.</p>
Bosman, Gerrie - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
11-Dec-19	Id like to add my vote against the factory.	<p>Cape EAPrac: Thank you for your registration. The link to the Draft Basic Assessment Report was included in the response to your initial email.</p>
Bosse, Brighid		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>Pollution possibilities.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The impact rating has been confirmed to be Very Low and is unlikely to be detected outside of the building.</p> <p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p>

COMMENT / ISSUES		RESPONSES
25-Mar-19	Over fishing in the sea.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Annual fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There is therefore no increase in activity unless the resource allows for it and not just the building of a new factory.</p>

COMMENT / ISSUES		RESPONSES
	The effect of smell in the town.	<p>LAQS: Air pollutants emitted from a source disperses into the atmosphere, the degree of which is determined by prevailing weather conditions. Wind direction dictates in which direction dispersion occurs while other parameters, e.g. wind speed, air temperature, solar radiation, upper-air stability, etc., determines the degree of dispersion that occurs. Generally, the worst dispersion conditions occur under very stable air conditions, usually manifested early in the morning during incidents of virtually no wind. Emissions then tend to stay fairly concentrated with maximum ground-level concentrations occurring in the immediate vicinity of the source. Even under such conditions the dispersion model does not predict any discernible odours in the area. There are other sources of odours in the area, notably a sewage pump station, which already generate odours, but the public in general either seems to have grown accustomed to it, or are ignoring it.</p> <p>AfroFishing: A zero odour scenario can never be guaranteed. Currently, amines, CO, SO2, H2S, NO2, PM's and other emissions are already in the atmosphere within the harbour and surroundings as determined by baseline air monitoring performed in 2019. We can however ensure that the technology and disciplines applied are best practises and the odour emitted in compliance with allowed thresholds etc.</p>
Botha, Petro - Botha Trust		
	Registered via email	Registered 25 March 2019
Background Information Document		
	Comment submitted is identical to that submitted by Mr Aucamp, apart from point 3 captured below.	Please see responses as provided to Mr Aucamp

COMMENT / ISSUES		RESPONSES
25-Mar-19	<p>This venture should be established in an industrial area or harbour away from residential and business or tourist areas would be more suitable for a factory producing fish meal. The proposed fish meal factory has not yet been established and an alternative location can be determined.</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustrria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: There are fish meal plants in Hout Bay, Cape Town Waterfront, St Helena Bay and many coastal and tourist towns throughout the world. These facilities are integrated into their environments and contribute to their local economies. Fishing activities of this nature need to be located in fishing harbours.</p>
	<p>Above is proposed because the risks and disadvantages of this proposed project in Mossel Bay Harbour far outweighs the advantages. Potential job opportunities and revenue are offset by potentially far greater loss of revenue and jobs as well as impact on the environment and residents.</p>	<p>MPBS: This is a statement that is un-substantiated and no scientific proof is provided to support the claim.</p> <p>Afro Fishing: The added fishing facility will contribute to the local economy and will certainly not negatively impact on Mossel Bay heritage and tourism, much like the fish meal plant in the Port of Cape Town Waterfront area. The Waterfront fish meal plant proves that the interests of many can be satisfied and provide much needed employment.</p>
Botha, Gloudi - Coetzee Alberts Architects		
	Registered via email	Registered 22 March 2019
Background Information Document		

COMMENT / ISSUES		RESPONSES
22-Mar-19	How tourist activities will be influenced. Coetzee Alberts Architects are the consultants for a new tourist route in the Mossel Bay CBD.	<p>MPBS: Please see the SIA for consideration of impacts on tourism.</p> <p>Afro Fishing: Tourism activities will not be influenced as explained above.</p>
	On advising clients on future property values.	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on property values.</p> <p>Afro Fishing: Zero effect on future property values. There has been no record of deflated property prices due to the presence of a fish meal plant. The opposite has actually occurred where fishing activity stopped in a harbour and the precinct deteriorated due to the loss of employment and economic activity. The result being an increase in unrest and poaching.</p>
	Mossdustria location - the company / client of the proposed development already has a plant in Mossdustria that can accommodate the activities.	<p>Cape EAPrac: The plant at Mossdustria has recently had its Air Emissions License (AEL) revoked for non compliance. Afro Fishing was a client of this facility but currently takes its cannery offal to Atlantis.</p> <p>Afro Fishing: The plant in Mossdustria is an offal processor which does not use fish meal and oil processing methods. This plant also has no odour abatement systems installed. As noted above it will be unviable to locate the fish meal plant outside the harbour.</p>
Botha, G - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Botha, Willem S - Diaz Court Body Corporate		
	Registered via email	Registered 22 March 2019
Draft Basic Assessment Report		
	Thank you for the information you have made available with regards to this matter and for the informative nature of your public hearing.	<p>Cape EAPrac: Thank you for your participation in the EIA process.</p>

COMMENT / ISSUES		RESPONSES
Dec-19	After discussion with the trustees I can hereby submit Diaz Court Body Corporate's position as a Registered Interested Party and confirm that I am acting with the necessary capacity in that regard.	
	We are not opposed to the facility, which creates jobs in the community, if the following are made conditions of the permission/license granted by the relevant authorities:	
	<p>1. All product brought to the facility for processing must be kept in appropriate cold storage and be of sufficient "freshness." This is in line with the best practice described by the gentleman for Afro Fishing at the public hearing. It is our submission that such practice becomes mandatory rather than just a "best effort" approach. We leave the specific details of such a potential condition to the determination of those with expertise in such matters who can advise the authority impartially.</p>	<p>LAQS: LAQS agrees with this statement. It must be born in mind the freshness of fish is a key component of Afro Fishing's business model.</p> <p>Afro Fishing: Today the factories on the West Coast process with minimal complaints without an RTO unit. They have improved their disciplines, only process fresh fish and using conventional scrubbing technology. This application (which includes RTO) will obviously have its own set of unique permit conditions. It is assumed that these conditions will include specifics relating to fish freshness, etc.</p>
<p>2. Variation to the proposed RTO unit design or functionality, unless resulting in better performance than current published estimates, would constitute a breach of the license and grant the authority the right to cancel said license if the license holder cannot rectify the issue within a reasonable time.</p>	<p>LAQS: RTO treatment of odorous gases from the fishmeal plant is state-of-the-art technology and an essential component in the design of the proposed plant. Currently there is no better technology available.</p> <p>Afro Fishing: It will obviously not be in Afro Fishing's interest to not comply with these permit conditions and risk factory closure after investing in a new factory.</p>	

COMMENT / ISSUES		RESPONSES
09-	<p>3. The RTO unit and other mitigating procedures as described should at all times be operational if the facility is in use. Any defects, sub-optimal performance or maintenance of the RTO unit or other procedures would necessitate a break in production until such defect is addressed or maintenance is completed. An event of significant breach or pattern of consistent minor breaches of the conditions grant the authority the right to cancel the license.</p>	<p>Cape EAPrac: The use of the RTO will be a non-negotiable condition recommendation from this office and from LAQS. It is also recommended that all relevant protocols are developed according to the requirements of the licensing authority. The right of the licensing authority to close down the plant for non compliance is inherent.</p> <p>LAQS: As the whole process will be controlled by an intelligent computer system, all of the key components will be monitored by sensors so that early warning is given if any of the operating parameters is out of specification. Should the fault not be corrected, the computer will shut down the plant.</p>
	<p>4. The authority granting the permission/license maintains the right to cancel said permission/license at any time if the proposed facility, for whatever reason, technical or otherwise, fails to operate to the proposed standards, or is found to be an unreasonable nuisance to other parties or sectors of the local economy. The authority will notify and give the license holder reasonable time to attempt to rectify any breaches under further condition that the facility will not be operated during such a period until the breach is remedied.</p>	<p>Cape EAPrac: This office supports this recommendation.</p> <p>LAQS: LAQS supports this recommendation as well.</p>
	<p>While the above conditions may be construed as onerous, and we have sympathy for the investment of capital considerations in question, we believe that this approach strikes a fair balance. As this matter concerns potentially both the constitutional and economic rights of a large amount of people, we advocate that a cautious approach by the authorities and all involved is warranted.</p>	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>a) Economic conditions; A single for profit company is granted a licence which will negatively impact many other businesses in the area, particularly in the tourism industry, which is sensitive to ANY smell</p>	<p>MPBS: Please see the SIA for consideration of impacts on businesses.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The fishmeal factories located in Cape Town's waterfront and Hout Bay did not seem to scare away any tourist</p> <p>Afro Fishing: Fishing enterprises in South Africa have numerous stakeholders otherwise they will not be granted fishing rights. Profits are therefore well distributed. Odour will be managed as noted above.</p>
<p>b) Degradation of ambient air quality and general reduction in enjoyment of the environment in the area which currently has a pleasant ocean scent</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Afro Fishing: As noted in the air quality impact study there will be negligible impact on the local environment.</p>

COMMENT / ISSUES	RESPONSES
<p>c) Substantive change to the character of the smallest commercial harbour by the introduction of heavy industries and general noise level increase to a relatively quiet harbour</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Afro Fishing: We are a fishing company wanting to do fishing activities in an area within the harbour demarcated for fishing activity. If one studies the long term capital expenditure plans of Portnet then the harbour is going to be expanded anyhow to meet future economic and maritime needs.</p>
<p>d) Health concerns about the effect that long term exposure to low levels of H2S, produced by the facility, will have on nearby residential zones.</p>	<p>LAQS: The Reference Concentration for Chronic Inhalation Exposure (RfC) of H2S, as published by the USEPA, is 2 µg/m3, a value well in excess of the odour threshold value of H2S used in the air quality impact assessment. The maximum 99-percentile ground-level concentration estimated is 0.6 µg/m3, well below the chronic exposure RfC defined by th3 USEPA.</p> <p>Cape EAPrac: The Garden Route District Municipality will conduct a baseline odour screening at the harbour. This will provide a starting point to identify in future, any potential problems and their origins. The proposed facility will implement the Best Available Technology to ensure that their impact on the air quality at the port complies with all relevant requirements. Please also note that the other fishmeal facility to which you refer has recently had their license revoked for non compliance. Thus it is a priority of Afro Fishing to ensure that this facility is designed, built and operated at the highest standards.</p> <p>Afro Fishing: All air pollution and healthy air thresholds will be met. The new facility will not be approved if this is not the case.</p>

22-Mar-19

COMMENT / ISSUES	RESPONSES
<p>Relocation of facility to a more suitable site for heavy and noxious industries. This solution circumvents entirely the issue of long term exposure of residential zones to low levels of chemicals produced by the facility and avoids any future litigation or claims that could arise from such a matter.</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: There are fish meal plants in Hout Bay, Cape Town Waterfront, St Helena Bay and many coastal and tourist towns throughout the world. These facilities are integrated into their environments and contribute to their local economies. Fishing activities of this nature need to be located in fishing harbours. Please also note that there are no chemicals being emitted from the facility.</p>

COMMENT / ISSUES	RESPONSES
<p>Alternatively, the implementation and development of stricter and newer procedures than seen to date at any such facility, which could address the relevant concerns. Mosselbaai has a considerably larger population than Peniche, Portugal and its population density is also much higher greater means significantly more people will be affected.</p>	<p>LAQS: Because the proposed plant will produce fishmeal which is not destined for human consumption, the process is included in the List of Activities that Result in Atmospheric Emissions as published in Government Notice 893 of November 2013 (as amended). The process falls under Category 10: Animal matter processing, but no emission limits have been defined for such processes. The only legislative statement made is that "best practice measures intended to minimise or avoid offensive odours must be implemented by all installations". The planned plant design and use of RTO technology is the current best practise technology and complies fully with European emission limits for such installations.</p> <p>Cape EAPrac: The introduction of technology that will in all likelihood become the Best Available Technology in a contentious industry should also be seen as an important aspect. It sets aside the port of Mossel Bay as an innovative hub.</p> <p>Afro Fishing: Modern technology and very efficient odour abatement technologies will be applied as happens in modern EU fishing harbours. Although the population may differ to some of the reference sites, the area affected is normally that in very close proximity to the factory. Dispersion models also indicate this.</p>
Brand, Lynette - Private	
Registered as I&AP	Registered 10 December 2019
Draft Basic Assessment	
<p>My apartment no 4 King Cenric Beacon Wharf Mossel Bay is right next to the factory which is still tolerable at 200 or so tons but 1000 tons a day and the excruciating fishmeal stench will make the place unbearable.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. There are other existing sources of odours in the area, notably a sewage pump station, which already generate odours, but the public in general either seems to have grown accustomed to it, or are ignoring it.</p>

COMMENT / ISSUES		RESPONSES
	<p>The trucks a day will drive the place apart and rattle apart. The sea source will not last long before importing from Spain further traffic to bring in.</p>	<p>Afro Fishing: As per the Traffic Impact Study there will be a LOW impact on the surrounding road network. In future, when the Port of Mossel Bay becomes an import/export port there will be zero impact on the road network as all the product will be exported in containers directly from the Port of Mossel Bay. With regards the fishing resource, this is sustainably managed by the Dept of Fisheries who apply 'operational management programs' to the various species.</p>
	<p>Please stop the development for minimal job creation and allow visitors bring the money to the table.</p>	<p>MPBS: This is a statement. Notwithstanding, the job creation during operations is significant: 1 100 direct, indirect and induced jobs per annum on average could be sustained during the first 10 years in the Mossel Bay area, of which 560 are direct jobs.</p> <p>Afro Fishing: We would all like an environment that is sustained on tourism alone. Unfortunately, we reside in a country where there is mass unemployment especially among the lower classes. Tourism alone is not going to resolve this problem. Mossel Bay has a high tourism level for one month in the year. This project will provide all year employment plus in order for Afro Fishing to maintain its Level 1 B-BEEE rating, money will have to be spent on enterprise development, social development, skills development and supplier development projects.</p>
Brauer, Denise - Private		
	Registered as I&AP	Registered 9 December 2019
Comment submitted to Mossel Bay Municipality		

COMMENT / ISSUES		RESPONSES
09-Dec-19	We hereby submit our objection against the development of a fish factory in Mossel Bay. We do not believe that it will be an advantage to our environment, town or health.	<p>Cape EAPrac: our submission to the Mossel Bay Municipality has reference. The application for the Afro Fishing facility is currently undergoing an Environmental Impact Assessment.</p> <p>I have registered you as an Interested & Affected Party (I&AP) to ensure that you receive all future correspondence. Your comments as submitted to the municipality will be collated and responses issued in due course.</p> <p>Please feel free to review all the available documentation on our website</p>
Brown, Nahiam - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Brown, Linda - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Bruinders, Quelynne - TNPA		
	Automatically registered as an I&AP.	Registered 22 February 2019
Buis, Sarah		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
	Changes in coastal discharge permit	<p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>The implementation of the fishmeal facility is likely to lead to a further improvement in the discharge water, as it will provide an additional mechanism for removing proteins from the water.</p>

COMMENT / ISSUES		RESPONSES
25-Mar-19	Cares about the fish in the sea.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Certain species of pelagic fish are not suitable for human consumption for several reasons. For example, anchovy is small and oily and not conducive to filleting and processing for human consumption. This type of fish is in abundance in SA waters and therefore harvested for reduction into fish meal and fish oil. Fish meal is sold into the animal feed industry and fish oil mainly used for human consumption. The fish is caught at night because they mainly feed and shoal at night.</p>
Buis, Segall		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
	Local and district municipality - possible double standards.	<p>Cape EAPrac: Concerns regarding double standards on the part of the authority should be taken up with them directly or via any other mandated watchdog authority.</p>

COMMENT / ISSUES		RESPONSES
25-Mar-19	Cares about the fish in the sea.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Certain species of pelagic fish are not suitable for human consumption for several reasons. For example, anchovy is small and oily and not conducive to filleting and processing for human consumption. This type of fish is in abundance in SA waters and therefore harvested for reduction into fish meal and fish oil. Fish meal is sold into the animal feed industry and fish oil mainly used for human consumption. The fish is caught at night because they mainly feed and shoal at night.</p>
Carstens, Cornelle - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Clayphan, D.N. - Betty's Boutique Hotel		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Coetzee, Hugo - Southern Cape Fish Meal (Pty) Ltd		
	Registered via email	Registered 13 March 2019
Background Information Document		
	Concerned comments on social media about the proposed fishmeal factory in Mossel Bay harbour need to be investigated.	<p>AfroFishing: I agree persons should not be allowed to intimidate others with 'false information' and thereby play on the emotions of a community. On the other hand freedom of expression should be allowed.</p>

COMMENT / ISSUES	RESPONSES
<p>Afro Fishing is currently operating a fish by-products rendering plant in the Mossel Bay harbour. Yet Afro Fishing also advertises that its new proposed (read bigger) fishmeal plant triggers listed activities in terms of the National Environmental Management Act (NEMA, Act No.107 of 1998 as amended), the 2014 Environmental Impact Assessment (EIA) Regulations and the National Environmental Management: Air Quality Act (NEM: AQA, Act 39 of 2004).</p>	<p>Afro Fishing: That is incorrect. Please make the effort to visit Afro Fishing. I will gladly take you through the facility so that you can see for yourself whether your random allegations are appropriate or not.</p>
	<p>Cape EAPrac: Afro Fishing (Pty) Ltd was issued a Record of Decision (ROD) on the 13th July 2006 for the construction and operation of a fish cannery on Quay 1 of the Mossel Bay harbour in terms of the Environment Conservation Act (ECA, Act 73 of 1989) & EIA Regulations (R1182). The cannery processes fish for human consumption and as such there was no requirement to apply for an Air Emissions License (AEL) either under the Atmospheric Pollution Prevention Act (APPA, Act 45 of 1965) or the National Environmental Management: Air Quality Act (NEM:AQA, Act 39 of 2004). The boilers associated with the cannery for the production of steam for the cooking of the fish are below the threshold identified in the NEM:AQA Regulations, although regardless of this, Afro Fishing registered as a Controlled Emitter when those Regulations were gazetted on 1 November 2013.</p>

COMMENT / ISSUES	RESPONSES
<p>Does this mean that Afro Fishing's current operations on site do not require environmental licensing? Or does Afro Fishing actually admit that it does not possess the required environmental licensing for its present rendering activities on site?</p>	<p>In June 2014, Afro Fishing commenced with a process to implement a Hiller Tricanter by entering into discussions with the DEA&DP, Eden DM and the Mossel Bay Municipality. The Hiller separates the fish material that remains after processing into three physical states, namely water, oil and solids. The water is expelled along with the wastewater as per their authorisation and Coastal Waters Discharge Permit, the oil is put into containers and is sold for human consumption as Omega 3 oils and the solid material is sold to the South Cape Fish Meal facility. The Hiller does not require any additional authorisations in terms of the NEMA (below all thresholds) or NEM:AQA (process is for human consumption product) and as such Afro Fishing undertook an Addendum to their existing Operational Environmental Management Programme (OEMP). This Addendum was approved by the DEA&DP on the 26th September 2014.</p>
	<p>In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p>
	<p>Afro Fishing (Pty) Ltd are currently proposing an expansion to the existing cannery to redevelop the old I&J facility adjacent to them to develop a fishmeal and fish oil reduction facility. Since fishmeal is a product not for human consumption, R893 of the NEM:AQA and the NEMA EIA Regulations are applicable and as such the applicant has commenced with the initial public participation associated with this Environmental Impact Assessment process.</p>

COMMENT / ISSUES	RESPONSES
	<p>It is thus clear that Afro Fishing (Pty) Ltd have applied for and been issued the relevant permits and authorisations in terms of the ECA, APPA, NEMA & NEM:AQA since 2006.</p>
<p>Under this legislation NEM:AQA (GN No. R.893) the production of fishmeal and/or the rendering of fish by-products is a listed activity that are described under category 10 (Animal matter processing): Processes for the rendering, cooking, drying, dehydrating, digesting, evaporating or protein concentrating <u>of any animal matter not intended for human consumption</u> at all installations handling more than 1 ton of raw materials per day. Hence the necessary environmental licenses and permits for the specific activities must first be obtained from the relevant Licensing Authority before the rendering plant can start with its operations.</p>	<p>Cape EAPrac: The important item that you refer to here is "of any animal matter not intended for human consumption". The Hiller utilises fresh material as part of the manufacturing process to obtain fish oils for human consumption, it therefore did not require a Category 10 authorisation. The materials that remain are then removed from site and provided to other rendering facilities who are then required to be licensed in processing the offal further.</p>
<p>Afro Fishing has installed a Hiller Tri-canter system in 2015 to render their fish by-product by cooking it with direct steam injection. Then drying and dehydrating the cooked fish by-products by pressing out the stick water and oil of the solid components with centrifugal force and splitting the stick water and oil components afterwards. The fish oil is then sold and the stick water is pumped into the sea.</p>	<p>Cape EAPrac: Due to the revoking of the license of South Cape Fish Meal for non compliance, Afro Fishing is currently transporting their solid offal to a registered site in Atlantis.</p> <p>Afro Fishing: That is incorrect. Afro Fishing does not press and dry the solids removed from the Hiller process. These solids are sold to the local offal processor. The stikwater is discharged as prescribed in our Environmental Management Plan and Coastal Water Discharge permit.</p>

COMMENT / ISSUES	RESPONSES
<p>The Afro Fishing factory can process roughly 200 Ton of fish per day on full capacity which delivers roughly 100T of fish by-product not intended for human consumption. It means their production far exceeds the 1-ton limit per day to be exempted from the aforementioned legislation.</p>	<p>Cape EAPrac: The important item that you refer to here is "of any animal matter not intended for human consumption "exceeding 1 ton per day. The Hiller utilises fresh material as part of the manufacturing process to obtain fish oils for human consumption, it therefore did not require a Category 10 authorisation. The materials that remain are then removed from site and provided to other rendering facilities who are then required to be licensed in processing the offal further.</p> <p>Afro Fishing: Correct AF processes more than 1 ton per day. See explanation above.</p>
<p>If we break down the category 10 regulation, Afro Fishing triggered the need for an Air Emission Licence (AEL) for its listed activity from 2015 until today in one or all of the following manners:</p> <ol style="list-style-type: none"> 1. Rendering: That is defined as a process that converts waste animal tissue into stable, usable materials as in this case dehydrated, concentrated fish proteins and fish oil; 2. Cooking: By using direct steam injection from the boiler; 3. Drying and Dehydrating: By spinning the product so fast that the centrifugal force presses out the water and other liquid including fish oil from the protein tissue. In this case it dehydrates the fish by-products from a plus minus 80% moisture content to a 45-50% moisture content; 4. Protein concentrating; 5. Animal matter not intended for human consumption: In this case heads, guts, scales and tails. 6. ALL installations handling more than 1 ton of raw material per day: In this case up to 100 ton per day when the factory was in full production. 	<p>Afro Fishing: Incorrect, see the explanation above. Waste solids for non-human consumption purposes are supplied to the local offal processor. The solids are not pressed or dried. There is therefore no gaseous emissions due to drying requiring an Atmospheric Emission License.</p> <p>For the record, there is also no centrifugal equipment capable of centrifuging solids as noted by the Mr Coetzee.</p>

COMMENT / ISSUES		RESPONSES
13-Mar-19	Hence it ought to have been clear to the local authorities, and in particular to the officials in the employ of the Garden Route District Municipality (the latter that acts as the Licensing Authority concerned), that Afro Fishing does need the required environmental licensing to conduct its present fish rendering activities on site. Yet for the past four years they were allowed to continue with their current operations on site, ostensibly without the necessary licensing. Why?	<p>Afro Fishing: As noted above there is zero drying of solids taking place and hence no emission of drying gases. For this obvious reason the Hiller process does not trigger Category 10 and hence no AEL required.</p>
	I have on numerous occasions brought it to the licensing authorities' attention that this activity at the Afro Fishing premises is unlawful. The two responsible persons that act as the licensing authority in the case, is Dr Johann Schoeman and Mr Angus Andries from the Garden Route District Municipality. For some reason or other they have refused and/or neglected to act against Afro Fishing. A reasonable person cannot come to any other conclusion that they either intentionally swept the matter under the carpet or they acted with gross negligence in ignoring the evidence presented to them.	<p>Afro Fishing: Mr Coetzee is making allegations that municipal officials are 'sweeping the matter under the carpet' when there are no emissions as described above and hence no need for an AEL. I cannot answer this irrational allegation other than to inform that AF has never paid a municipal official to 'sweep a matter under the carpet'.</p>
	It begs the question again: Why would that be? Is criminal or foul play possibly involved?	<p>Afro Fishing: No foul play as the Hiller process does not trigger the need for additional authorisations as noted above. Please take up the invitation to visit Afro Fishing. I will gladly take you through the canning process and you can see for yourself whether we have dryers etc.</p>
	<p>The questions that need to be asked and answered are:</p> <ol style="list-style-type: none"> 1. Why did Dr Johann Schoeman and Mr Angus Andries refuse to act against the illegal activity? 2. What did they gain out of allowing the activity to take place without the proper licensing in place? 	<p>Afro Fishing: See above</p>

COMMENT / ISSUES	RESPONSES
<p>Furthermore, under Activity 34 in Afro Fishing's pending application it is stated: 'The expansion to include the fishmeal, fish oil reduction plant will require an amendment to the current coastal water discharge permit and will require a new Air Emission license'. This indicates that there is a current coastal water discharge permit which also needs to be investigated.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>Afro Fishing: The comment simply informs the public that an amendment will be required. Kind of obvious as a new process will be introduced to the site and AF.</p>
<p>The reason for this must be explained by understanding the process involved. In the process of dehydrating/drying the protein component, the liquids are extracted that consist of stick water and fish oil. Stick water is the water-based component deriving from the intestinal fluids, blood and water that was in the fish body and flesh. The stick water is high in protein and this makes it dangerous to pump into the sea. In this case Afro Fishing was allowed to pump their stick water directly into the sea. This is pollution of huge proportions.</p>	<p>Afro Fishing: Firstly, there is no drying stage in the Hiller process.</p> <p>Secondly, the discharge from the Hiller is well documented in the existing AF Coastal Water Discharge permit application and the permit granted accordingly.</p>

COMMENT / ISSUES	RESPONSES
<p>Attached are photos of the stick water being pumped into the sea at Mossel Bay harbour. The wide spread dispersion of the stick water and a container with a sample of the stick water that settled to indicate the protein content by settling.</p>	<p>Afro Fishing: If this was the case, the rocks in the vicinity of the discharge area will be covered in proteinaceous slime and there would be oily deposits on the high water line. AF welcomes a site visit and the feedback from divers to dispel the allegations made by Mr Coetzee.</p>
<p>Stick water is very dangerous to pump into the sea as it is high in protein and bacteria growth is rapid in this medium. The stick water settles in the sea and forms a layer on the sea bed. This protein layer then forms a stratum for microbes like bacteria and pathogens to breed in. The bacteria use the oxygen in the water to break down the proteins and the lack of oxygen then kills all the sea life on the bottom of the ocean. Not even to speak of the pathogens that makes the sea life sick.</p>	<p>Afro Fishing: If this was the case, the rocks in the vicinity of the discharge area will be covered in proteinaceous slime and there would be oily deposits on the high water line. AF welcomes a site visit and the feedback from divers to dispel the allegations made by Mr Coetzee. AF also welcomes sampling of the water at its discharge point to check for lack of oxygen, etc. These allegations are all very easy to test and prove or disprove as false information.</p>
<p>Furthermore a small percentage of oil is left in the stick water after the oil was extracted. This small percentage must not be discarded as insignificant. The percentage needs to be multiplied by the amount of stick water actually produced and pumped into the sea. In this case 50 000 litre of stick can be produced on full production currently, but with the new plant (ten times the size of the current capacity) the potential pollution will be much higher. On the photo the oil pollution is visible by the naked eye. The thin film of oil on top of the sea water gives it a distinct shiny appearance. Just remember that this factory will be 10 times bigger than the current operation with a much bigger oil pollution if they continue to let the company discharge this quality of water into the ocean. They do not mention that they want to amend the quality standards of the water - they only want to increase the volume allowed.</p>	<p>Afro Fishing: As per above there are numerous visual, analytical and sampling methods that can be applied today to check whether there has been any impact due to the discharge of stikwater. AF welcomes this exercise to clear it's name of the allegations made by Mr Coetzee.</p> <p>The new factory will not discharge oil, solids, stikwater or protein.</p>

COMMENT / ISSUES	RESPONSES
<p>The current operations were allowed without a stick water condensation plant and this also gives reason to suspect unlawful and foul play being present.</p> <p>All the relevant information and concerns were previously raised with the two officials concerned and yet no action was taken to stop the practice. Why?</p> <p>Our courts have accepted that an official who carries out his duties in total disregard of what he is supposed or required by law to do, would more likely than not be acting in bad faith.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority.</p> <p>Afro Fishing: There is no stikwater evaporation plant as there is no fish meal plant or rendering facility in the current AF setup. So by law and the existing AF authorisations there is no need for an official to intervene with current AF activities.</p> <p>This use of false information to create the impression that there is wrongdoing at Afro Fishing is coming across as a ploy to intimidate the local authorities as they have raised issues at Mr Coetzee's own business. We trust that this authorisation process will not be tainted by the false information supplied by Mr Coetzee.</p>
<p>If a reasonable suspicion of bad faith exists, it ought to provide enough reason for a proper investigation to be conducted into any intentional and/or gross negligent wrongdoing on the part of the Licensing Authority's officials in the employ of the Garden Route District Municipality. Such an investigation, that needs to include a forensic audit of the individuals involved and a comprehensive evaluation of all actions, omissions, permits and authorisations issued by the officials concerned, must be undertaken and finalised by a competent (and independent) authority prior to any decision being taken on the pending application of Afro Fishing.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority.</p> <p>Afro Fishing: See the relevant comments above. Mr Coetzee is using false information to make false allegations against the local authorities. I cannot react to this and it has no relevance to the content of this application.</p>

COMMENT / ISSUES	RESPONSES
<p>Afro Fishing gained financially from the lack of action undertaken by the officials concerned in that:</p> <ul style="list-style-type: none"> *Money was saved by not having to pay for environmental assessment practitioners; *No stick water evaporation plant needed to be erected – millions of Rands of savings; *No water treatment was needed; *No air emission treatment was needed; *Time was saved by not having to get the necessary licensing in place; *No Act 36 licensing and fees were needed. The cooking time was not adequate in the system to comply with Act 36 legislation for a by-products rendering facility but still the practise was left without interference; and *Lower production costs. 	<p>Afro Fishing: All irrelevant comments in the context of this application. All these inferences have been explained above.</p> <p>AF do hope that the authorities will see through the 'smoke screen' that is been created by Mr Coetzee and that Mr Coetzee's deliberate distortion of facts will not be allowed to influence the outcome of this application.</p>
<p>The above is only but a few ways that the company benefitted from the actions of the two officials involved.</p> <p>If any bad faith or gross misconduct on the part of any official (that latter that is also the decision maker) in the employ of the Licensing Authority is present, the whole process of evaluating and deciding on the current Afro Fishing application will be tainted with unlawfulness and illegality.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority.</p> <p>Afro Fishing: There are legal processes that can help decide whether these allegations of bad faith and misconduct are relevant or not. AF trust that these matters will be resolved and will not be allowed to taint new applications.</p>
<p>Hence I call for a proper investigation into the conduct and actions (or inactions) on the part of the Licensing officials concerned and the representatives of Afro Fishing prior to any final decision on the pending application for environmental authorisation is entertained.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority.</p> <p>Afro Fishing: Afro Fishing welcome any investigation into its current operation or to test compliance with licensing authorities.</p>
Coetzee, Hugo - Weskusvismeel	
Registered via email	Registered 25 March 2019

COMMENT / ISSUES		RESPONSES
Background Information Document		
25-Mar-19	Comment submitted is identical to that submitted under the auspices of Weskusvismeel.	Please see responses as provided to Mr Coetzee above
Coetzee, Jacqueline - Private		
	Registered via email	Registered 26 March 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		
Question 1 Comments:		
	a. The possibility of irregularities by two members of the licensing authorities, namely Dr Johan Schoeman and Angus Andries, must be investigated by the public protector, as well as the relevant authorities in the Western Cape government.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: These are allegations made by Mr Coetzee and will need to be tested in the courts.</p>

COMMENT / ISSUES	RESPONSES
<p>b. Pollution of the sea due to stick water from Afro Fishing.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>Afro Fishing: No stikwater will be pumped into the sea. This is not within the parameters of the process flow diagram for the proposed facility.</p>

COMMENT / ISSUES	RESPONSES
<p>c. The issuing of a "coastal discharge permit" that allows this type of pollution must be investigated for irregularities.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>Afro Fishing: Coastal discharge permits are precisely there to regulate discharges to the sea. They are not there to allow pollution as inferred by your concern.</p>
<p>d. Double standards are being applied on the industry e.g. rendering activities are being allowed without the necessary licenses.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: These are allegations. Please supply detail.</p>
<p>Question 2 Comments:</p>	

26-Mar-19

COMMENT / ISSUES	RESPONSES
<p>a. Concern regarding irregularities in the application process as well as the historic relationship between the licensing authorities and Afro Fishing.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: Once again these are allegations that have been made. Please supply specifics. Mr Coetzee has made these allegations based on false information whereby he claims Afro Fishing is currently DRYING offal. This is the same offal he happens to be buying from AF. We invite an inspector to visit AF and confirm whether we have a drying operation or not.</p>
<p>b. Concern regarding the pollution effect on Mossel Bay and the local sea life as well as its residents and visitors.</p>	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: There will be no impact on the residents of Mossel Bay or the environment.</p>

COMMENT / ISSUES		RESPONSES
		<p>LAQS: The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
	c. The effect of odour on the CBD residents, the economy and the tourism industry.	<p>LAQS: The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>MPBS: The air quality is a matter that is addressed in the socio-economic impact assessment. This comment assumes that odours will arise, which is contrary to the results of the Air Quality Impact Assessment that considers implementation and effectiveness of the proposed odour quality equipment.</p> <p>Afro Fishing: See the feedback by the Socio-economic impact study.</p>
Coetzee, Elza - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Coetzee, Janet - DEFF: Fisheries Management		
	Automatically registered as an I&AP.	Registered 16 July 2019
Coetzee, Lodewyk - Mossel Bay Ward 8, Ward Committee Member; DA Ward 8 Branch Chairperson		
	Registered via email	Registered 25 February 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>Proposed Developments are not in line with the SDF for Mossel Bay.</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Delplan: The Mossel Bay Harbour has a great potential to utilize the current buildings on the subject property and to develop these buildings to its fullest. The proposed development is an indicator that investors still want to develop the current harbour and expand the ancillary uses.</p> <p>The development of the Mossel Bay Waterfront is a great initiative, but the proposal will take time to develop. The current proposed development will develop the harbour to its fullest and utilize current buildings on the subject property.</p> <p>It is evident that the proposed development, although not in line with the Waterfront proposal, that it is in line with the MBSDF (2018) as it promotes a necessary economic injection that Mossel Bay needs and provides work opportunities for the locals.</p> <p>Afro Fishing: Please provide details as to why this development is perceived not to be in line with the SDF for Mossel Bay. According to the Port of Mossel Bay and the Municipal spatial planning the area designated for this project is zoned for INDUSTRIAL purposes and allocated to FISHING ACTIVITIES.</p>

COMMENT / ISSUES	RESPONSES
<p>The proposal does not align with the Character of the Town as small scale, quaint buildings.</p>	<p>Cape EAPrac: It must be pointed out that the development is not being proposed within an urban area, but within an active working harbour on Quays dedicated to commercial fishing industries. It also entails the redevelopment of an existing commercial fishing site which does not change the existing built environment.</p> <p>Afro Fishing: Meetings have been held with the Heritage Committee and their recommendations will be built into the project. The site zoning scheme requirements will also be adhered to.</p> <p>Francois Van Zyl: The development is not within the urban heart of Mossel Bay where the 'quaint' and small scale buildings are situated. It is within the industrial heart of the harbour, replacing existing dilapidated industrial structures.</p>

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 341 91 459">23-Feb-19</p> <p data-bbox="114 571 1066 635">Does the proposal conform to the Architecture Guideline and what is envisioned for future development?</p>	<p data-bbox="1099 276 1256 300">Cape EAPrac:</p> <p data-bbox="1099 312 2107 448">All new buildings will be within the 12.5m height restrictions and all other town planning regulations as determined in the Mossel Bay Integrated Zoning Scheme. The development as proposed in the Draft BAR is the extent of the proposal. There is no further future development.</p> <p data-bbox="1099 499 1245 523">Afro Fishing:</p> <p data-bbox="1099 536 2096 600">As far as we are aware there are no architectural guidelines in Mossel Bay or the Port of Mossel Bay. All building regulations and zoning schemes will be abided by.</p> <p data-bbox="1099 647 1290 671">Francois van Zyl:</p> <p data-bbox="1099 684 2152 927">The Architectural Design Guideline Manual for Mossel Bay (November 2015), provides broad guidelines for future development of all areas of the town. As pertaining the harbour, I quote from the manual: 'The precinct has a more course grain than the rest of Mossel Bay. This is obviously due to its function: it contains a collection of utilitarian buildings and storage facilities, some of which have beauty in their austerity'. As mentioned elsewhere, Heritage Mossel Bay has been consulted and client has undertaken to incorporate some of the natural stonework in the existing structures, into the new buildings.</p>

COMMENT / ISSUES	RESPONSES
<p>Increased Heavy Vehicle Traffic through Town which already are under pressure a concern.</p>	<p>Cape EAPrac: A Traffic Impact Assessment was undertaken by Urban Engineering and is available in the Draft BAR. The assessment indicated that the impacts will be Very Low.</p> <p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: An assessment will be made in this regard. In the long term however, all the finished product will be exported directly from the Port of Mossel Bay. Transnet long term planning allows for the port to load shipping lines as opposed to having to road freight containers to Coega or Cape Town harbours for export.</p>

COMMENT / ISSUES		RESPONSES
	What will the Impact be on the Tourism Sector and the Socio Economic Impact?	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6 that addresses the impact on local tourism and businesses. It is imperative that the sense of place that attracts tourists is not negatively affected. Special attention is thus required to minimise the visual impact and nuisance factors during construction and operations. If the proposed mitigation measures are implemented, there should be very little - if any - impact on tourism.</p> <p>Afro Fishing: See the feedback by the Socio-economic impact study.</p>
Compion, Johan - Eden District Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Cook, Louis - AfriForum		
	Registered via email	Registered 23 February 2019
Background Information Document		
	NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.	
	Air pollution in a sensitive tourism area.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p>

COMMENT / ISSUES		RESPONSES
23-Feb-19	The proposed factory should rather be moved to Mossdustria where there is an existing facility that the community as far as Dana Bay are objecting to. Air pollution in a residential area is thus even more objectionable.	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows:</p> <ul style="list-style-type: none"> - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater. <p>The harbour precinct provides for operational fishing industries and as such is not a residential area.</p>
Crous, Deon - Private		
	Registered via email	Registered 20 March 2019
Background Information Document		
	Comment submitted is identical to that submitted by Mr Aucamp, apart from point 3 captured below.	Please see responses as provided to Mr Aucamp

COMMENT / ISSUES		RESPONSES
20-Mar-19	This venture should be established in an industrial area or harbour away from residential and business or tourist areas would be more suitable for a factory producing fish meal. The proposed fish meal factory has not yet been established and an alternative location can be determined.	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: There are fish meal plants in Hout Bay, Cape Town Waterfront, St Helena Bay and many coastal and tourist towns throughout the world. These facilities are integrated into their environments and contribute to their local economies. Fishing activities of this nature need to be located in fishing harbours.</p>
	Above is proposed because the risks and disadvantages of this proposed project in Mossel Bay Harbour far outweighs the advantages. Potential job opportunities and revenue are offset by potentially far greater loss of revenue and jobs as well as impact on the environment and residents.	<p>MPBS: Please refer to the SIA for consideration of the impacts that were identified.</p> <p>Afro Fishing: The added fishing facility will contribute to the local economy and will certainly not negatively impact on Mossel Bay heritage and tourism, much like the fish meal plant in the Port of Cape Town Waterfront area. The Waterfront fish meal plant proves that the interests of many can be satisfied and provide much needed employment.</p>
Crous, Hannalie - Private		
	Registered via email	Registered 20 March 2019
Da Silva, Antonio- Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Da Silva, Rhoda- Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019

COMMENT / ISSUES		RESPONSES
De Goede, Johan - DEFF: Marine Resources Management		
	Automatically registered as an I&AP.	Registered 16 July 2019
De Klerk, Willie- Private		
	Registered as I&AP	Registered 9 December 2019
Draft Basic Assessment		
	It is my believe, that this project would be an enormous mistake! And we the citizens of Mossel Bay must oppose this project with utmost vehemence.	
	We as citizens must be very careful in just believing all the great things we hear about this project. It is an old trick in the deck of cards of developers. They bamboozle local inhabitants with the sweet smelling and sweet tasting promises of what the project can do in terms of all the great benefits associated with it. But once the bamboozled citizens gave their permission for the "project" to go ahead, all the promises disappear like fog in the sun.	<p>Cape EAPrac: The licensing conditions associated with such a development will be very strict and the licensing authority has the right to retract the license if the applicant does not comply. In addition, Air Emissions Licenses have to be renewed every five years and submit monitoring data on a regular basis. Thus should the project go ahead, any "promises" (commitments) made by the applicant will be legally binding and cannot be ignored.</p> <p>Afro Fishing: An investment of this nature will not be prudent if the intention of the investors were to bamboozle the community and local authorities. If we cannot get the permissions legitimately we do not want them and will invest elsewhere.</p>

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 1018 91 1102" style="writing-mode: vertical-rl; transform: rotate(180deg);">-Dec-19</p> <p data-bbox="114 485 1077 807">It is very easy for the so-called "experts" to call ordinary citizens that oppose this project words like "uneducated" or "uninformed"! In the meant time these "uninformed" and "uneducated" citizens perhaps have the foresight to see what lies in the future of this town if the good people of Mossel Bay does not oppose this type of project. These "experts" might dazzle us with the technicalities of fish factories that simply does not smell anymore, and is just a "blessing" to the entire area in which they were build, but why have we never heard of these? My personal opinion is give me a fish-related factory that does not smell and stink up the area, and I shall give you pigs that can fly!</p>	<p data-bbox="1099 225 1256 252">Cape EAPrac:</p> <p data-bbox="1099 261 2040 325">The project team is made up of a respected group of professionals who actually are recognised experts in their fields, not "so called" as you imply.</p> <p data-bbox="1099 373 1173 400">LAQS:</p> <p data-bbox="1099 410 2163 624">LAQS has NEVER referred to ANY member of the public as "uneducated" or "uninformed". All it can do is follow the science and report its findings. The public in general may, or may not, understand the science, or if they do, choose to ignore it in favour of emotional comment. If Mr De Klerk wishes to see a fishmeal plant that does not smell, I am sure that Afro Fishing will make the necessary contact details available so that Mr De Klerk can go and visit them himself. He'd better have some pigs handy so that he can teach them to fly!</p> <p data-bbox="1099 671 1249 699">Afro Fishing:</p> <p data-bbox="1099 708 2163 995">The whole idea of bringing in experts is so that they work through all the technical jargon and on behalf of the uninformed either give a project their approval or not. It would not have been fair to the community if I personally presented all the technical detail surrounding the project as I would be biased in my presentations. I can assure you that not one of the experts/consultants working on this project has been unduly influenced. Once again we want any decision to be based on a fully legitimate authorisation process. At the same time Afro Fishing want the process to be fair and not influenced by hidden agendas and by the false information that has been circulated by so called 'journalists'.</p> <p data-bbox="1099 1043 1850 1070">I look forward to taking you up on your reward of making a pig fly.</p>

COMMENT / ISSUES	RESPONSES
<p>09</p> <p>Once this monstrosity is built on the edge of our fair town, it would be impossible to get rid of it! It would scar the beauty of our town, it would plunder the environment of our Cape waters, it would pollute (YES! I said pollute, since I don't buy all the smart explanation and technical waffling that I am hearing) our fair town, casting the town into a cloud of stench and foul smells!</p>	<p>Cape EAPrac: The licensing conditions associated with such a development will be very strict and the licensing authority has the right to retract the license if the applicant does not comply. This has happened previously, point in case the fishmeal facility in Mossdustria. The authorities therefore can "get rid of it" if they do not comply with any requirements.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>LAQS suggests that Mr De Klerk steps away from the emotional reaction to the project and look at it objectively. LAQS does not "waffle", sir. It follows the science and reports its findings honestly and ethically, as is expected from a professional company, regardless of whether these findings support the views of any person, or group. LAQS does not care if its findings support industry, the public, the government, etc. But it will express its opinion in support of a project if the science supports it.</p>
<p>Call it what you like! But I oppose this with heart and soul we as the people of Mossel Bay must!</p>	<p>Afro Fishing: There are many existing such factories that have not impacted negatively on this 'fair town' or plundered the environment. This factory is actually small in comparison and the various impact studies indicate a LOW impact on the environment.</p> <p>The authorities will hopefully not allow projects that are based on 'waffle' and that will 'plunder' the environment.</p> <p>Cape EAPrac: Thank you for taking the time to submit your comments.</p>

COMMENT / ISSUES		RESPONSES
	NO TO THIS MONSTROSITY, THAT AS USAL WILL ONLY BENEFIT A SELECT FEW, AND IRRITATE AND DISADVANTAGE THE VAST MAJORITY.	<p>MPBS:</p> <p>Significantly more than just a few individuals will benefit: an estimated 1 100 direct, indirect and induced jobs per annum on average could be sustained in the Mossel Bay area over the first 10 years of operation. A combined initial investment of R437 million will give rise to a multiplied increase in GVA of approximately R162,44 million for the local area during construction, whereas approximately R102,8 million in additional GVA will accrue to the area over and above the initial operational revenue.</p>
De Kock, Elmarie- Private		
	Registered as I&AP	Registered 28 November 2019
Draft Basic Assessment		
28-Nov-19	I would like to register as an interested and affected person. I am the owner of a flat in Beacon Wharf.	<p>Cape EAPrac:</p> <p>Thank you for your email. I have registered you as an Interested & Affected Party for the Afro Fishing Environmental Impact Assessment process.</p> <p>Please follow the website link to view the Draft Basic Assessment Report that is currently available for comment.</p>
De Villiers Shami, Corelie - Private		
	Registered via email	Registered 28 February 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>As a small business owner in the harbour/tourist district it was with utter disgust that I learnt about the proposed plan to open a fish meal factory on Quay 1 in the harbour of Mossel Bay. We are already struggling with bad smelling trucks passing our business in Church Street, with old foul smelling fish water running out of the trucks as they wait by the traffic light, resulting in a fly problem. Is this the image we want to portray to tourist and holiday goers coming to our town?</p>	<p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: Unfortunately, residential and restaurant garbage has to be trucked from source to landfill sites so I cannot answer to the issue of smelling trucks. In terms of the proposed factory however, the intention is to process all the raw material onsite and to transport the finished product in closed containers or trucks.</p>

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 667 91 783">28-Feb-19</p> <p data-bbox="114 639 1070 735">How can there be a so called Waterfront development, attracting tourists and cruise ships to dock in the harbour and the first smell they get of Mossel Bay is that of stinking fish.</p>	<p data-bbox="1099 248 1256 272">Cape EAPrac:</p> <p data-bbox="1099 288 2152 384">According to the Port Development Plan, all tourist facilities, the so called Waterfront, will be developed on the western side of the port whilst the eastern side will remain commercial fishing and processing.</p> <p data-bbox="1099 432 2123 568">The design and process flow of the proposed fishmeal will not be like any existing fishmeal plants in the country. The introduction of technology that will in all likelihood become the Best Available Technology in a contentious industry should also be seen as an important aspect. It sets aside the port of Mossel Bay as an innovative hub.</p> <p data-bbox="1099 616 1167 639">LAQS:</p> <p data-bbox="1099 655 2152 751">The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p data-bbox="1099 767 2123 863">The technology that will be applied is the best available in the world. Nowhere in its application in fishmeal production has it resulted in the emission of odorous gases and the statement of "stinking fish" is simply unfounded.</p> <p data-bbox="1099 911 2145 975">Incidentally, as far as LAQS knows Mossel Bay's harbour is too small to accommodate cruise ships. They seem to anchor in the bay and ferry their passengers to shore.</p> <p data-bbox="1099 1023 1245 1046">Afro Fishing:</p> <p data-bbox="1099 1062 2168 1126">A similar fish meal factory resides in The Cape Town Waterfront, close to the One & Only Hotel and in Hout Bay. Tourism and cruise ship activity continue to grow in these ports.</p>

COMMENT / ISSUES	RESPONSES
<p>We have a very successful business in Mossel Bay attracting many tourist. With more and more foul smelling trucks passing us it will definitely have a bad effect on our business and the tourism industry.</p>	<p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: AF intend to add to the Mossel Bay economy and will provide much needed employment opportunities. The intention is to do this in a sustainable manner and to minimise impacts on the local environment and the tourism industry.</p> <p>Fish meal is stored in polypropylene bags so the product is sealed. Fish meal anyhow is a stable product and does not deteriorate. There will be no offensive odours emitted from a warehouse or during transport.</p>
Dekker, Susan - Private	
Registered as I&AP	Registered 9 December 2019
Draft Basic Assessment	

COMMENT / ISSUES		RESPONSES
12-Dec-19	Smell	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The technology that will be applied is the best available in the world. Nowhere in its application in fishmeal production has it resulted in the emission of odorous gases.</p> <p>Afro Fishing: As noted this will be a modern factory using technology that will eliminate offensive odours.</p>
	Water contamination	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>The facility will apply for an amendment to this permit to allow for the increase in volume of seawater that will be used.</p>
	Indiscriminate stripping of ocean for short term economic gain.	<p>Afro Fishing: Annual fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There is therefore no increase in activity unless the resource allows for it and not just the building of a new factory.</p>

COMMENT / ISSUES	RESPONSES
Damage to ocean bottom environments.	<p>Cape EAPrac: The target species, anchovy and red-eye, are pelagic species. This means they shoal in the upper waters of the ocean. Therefore no trawling that drags nets along the bottom takes place in this fishing industry.</p> <p>Afro Fishing: The species to be fished for this factory are sustainably managed by the Department of Fisheries by means of 'operating management programmes'.</p>
Establishing of fishing quotas, will it be scientific?	<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so.</p>
I am very concerned about the damage already done to the ocean around us.	<p>Afro Fishing: Afro Fishing can only make an investment of this nature if we are confident that the Department of Fisheries are sustainably managing the fish resource. The scientists have 35 years of uninterrupted fish survey data which is used to determine biomasses per area and the allowable catch for the various species.</p>
Comment submitted to Mossel Bay Municipality	
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	

COMMENT / ISSUES	RESPONSES
<p>I am a concerned citizen of Mossel Bay and with this letter I wish to submit my protest against the proposed fishmeal facility in the harbour. I have read up widely about the subject, notwithstanding the impact assessment that has been done for facilities in other parts of the world.</p>	<p>Cape EAPrac: You have been registered as an Interested & Affected Party (I&AP) for the Environmental Impact Assessment process for the proposed Afro Fishing Fishmeal & Fish Oil Reduction Facility. This will ensure that you receive all future correspondence. For your information I have included the summary presentations of the EIA process as presented at the public meeting / open day on the 20th November 2019.</p> <p>Please feel free to review the available reports on our website via the link below. Any comment you may have regarding the reports and proposal must be submitted in writing to this office on or before 12 December 2019.</p>
<p>It is not just odour, noise and additional traffic that are impacts but also the uncontrolled and sometimes unintentional dumping of chemical and organic waste in the sea that is associated with such a facility.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>The facility will apply for an amendment to this permit to allow for the increase in volume of seawater that will be used.</p>

COMMENT / ISSUES		RESPONSES
11-Dec-19	<p>I feel that the municipality and Afro Fishing are overstating the short term benefits such as economic growth and job creating (which is not actually that impressive). The foreign currency that will be earned is only going to benefit a few individuals.</p>	<p>MPBS: This is a statement. However, Afro-Fishing is a going concern with a sustainable operation over the long-term. An investment of this nature would not be considered if it is not viable and feasible in terms of operations linked to the derived benefit over the long-term.</p> <p>Afro Fishing: The short to medium term benefits are actually vast. We reside in a country where there is mass unemployment especially among the lower classes. This project will provide all year employment, earn foreign currency plus in order for Afro Fishing to maintain its Level 1 B-BEEE rating, money will have to be spent on enterprise development, social development, skills development and supplier development projects. So forex earned is firstly going to pay for these salaries and wages, all other input costs plus the projects referred to above. This is why the government is pro-investment of this nature and why there is B-BEEE legislation to spread the benefits. If this project does not tick all the boxes then no project will.</p>
	<p>I am concerned about the sustainability and scientific applicability of fishing quotas. We know the sea is under enormous pressure. With the cultivation of fishmeal there is even less discrimination regarding the type of fish species being caught. The fishing techniques are also often responsible to damage to the sea floor due to dragging of the nets. Is fishmeal really the best solution to the world food security?</p>	<p>Afro Fishing: Afro Fishing can only make an investment of this nature if we are confident that the Department of Fisheries are sustainably managing the fish resource. The scientists have 35 years of uninterrupted fish survey data which is used to determine biomasses per area and the allowable catch for the various species. Their proposed fishing methods and permit conditions prevent environmental damage.</p> <p>The species that will be harvested for fish meal production are short lived species that do not have human consumption market potential. They however produce a high quality fish meal which is valuable for inclusion in agri- and aqua- feeds. These feeds are used to farm product that is supplied to world markets and hence providing food security. The fish oil is mainly supplied to pharmaceutical companies who produce health products from the oil (e.g. omega 3 and 6) for human consumption.</p>

COMMENT / ISSUES	RESPONSES
<p>Then there is the implications of fraud and corruption in neighbouring countries that are currently under investigation.</p>	<p>Afro Fishing: The “fish rot” scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p> <p>The department officials have 112 days to record a decision regarding this application, so there is time for DEADP to determine for themselves whether Afro Fishing is linked to Iceland and corrupt Namibian officials.</p>
<p>No, we do not want this mess near us. Rather make a larger part of our coastline around the Point a Marine Protected Area so that the sea life can recover.</p>	
Dellemihn, Anton - Mossel Bay Municipality	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Dlaku, Vathiswa - Afro Fishing employee	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Dopolo, Mbulelo - DEFF: Oceans & Coasts	
Registered as I&AP at public meeting / information session	Registered 20 November 2019

COMMENT / ISSUES		RESPONSES
Draft Basic Assessment		
<p>The Department of Environment Forestry & Fisheries (DEFF) in its Oceans & Coasts (O&C) Branch has reviewed the Draft Basic Assessment Report in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (ICM Act).</p>		<p>Cape EAPrac: Thank you for taking the time to review the DBAR.</p>
<p>The Applicant must take note that the O&C Branch in the DEFF has a mandate to protect the ecological integrity, natural character and economic, social and aesthetic value of coastal public property; as well as to protect people, property and economic activities from risks arising from dynamic coastal processes. The Branch also sought to ensure that the use of natural resources in the coastal zone and development associated with the coastal zone is socially and economically justifiable and ecologically sustainable.</p>		<p>Cape EAPrac: So noted.</p>
<p>In addition, the applicant should note that comments and recommendations as provided below are intended to ensure the achievement of the objectives of the ICM Act and guarantees that the coastal environment will be protected and conserved throughout all phases of the proposed project.</p> <p>The O&C Branch does not object the proposed development of the fishmeal and oil reduction facility as a whole partly due to its contribution in terms of creating employment opportunities and also contributing in the national schools nutrition programme.</p>		<p>Cape EAPrac: We take note that the O&C has no objection to the proposed facility. Thank you for your participation in this EIA process.</p>
<p>Comments are provided below:</p>		

COMMENT / ISSUES		RESPONSES
20-Dec-19	1. The Applicant must ensure that the demolition of the current infrastructure as well as the construction and operation of the proposed facility are done in a manner that will not result in marine pollution. And must also ensure that the development footprint of the proposed facility does not exceed the footprint of the old I&J facility.	<p>Cape EAPrac: The demolition process will be done in such a manner as to minimise as far as possible the impact on the marine environment and to the neighbouring properties.</p> <p>The development footprint will align with the existing I&J facility footprint (all hard surfaces) entirely.</p> <p>Afro Fishing: When it pertains to the fish meal plant side, there is a fair match with what is existing. Likewise, this is the case with most of the cold store/warehouse side. However the warehouse does fill all the space between the buildings on the Portnet Gate 3 side. We will however not develop outside of the two applicable Portnet erven.</p>
	2. Furthermore, Afro Fishing must demonstrate that their infrastructure (pipeline, channel etc.) has the capacity to handle the proposed discharge volume.	<p>Cape EAPrac: The discharge infrastructure will be designed to facilitate the volume required.</p>
	3. According to page 74(3) of the Draft BAR, "the effluent quality will be improved" but does not clearly demonstrate as to what measures will be implemented to achieve the statement.	<p>Afro Fishing: The added discharge will be for water used for condensation. There are no pollutants in this water, and it does not come into contact with any fish or processed fish. This is the volume that is increased.</p> <p>There is no processing waste from a fish meal plant as the idea is to process everything in order to achieve the best yield possible. There may be some sludge from the fish oil tanks. This will be drummed and sold to local farmers for animal feed.</p> <p>The intention however is to improve the existing cannery discharge water quality as part of the expansion project. A DAFF unit and settling tanks will be installed. All protein collected here will then be included in the fishmeal processing. This is now possible as the skimmed solids can be put through the fish meal plant.</p>

COMMENT / ISSUES		RESPONSES
4. Lastly, we have noted that effluent discharge from the current operation is discharged in terms of a National Environmental Management: Integrated Coastal Management Act, Act 24 of 2008 Coastal Waters Discharge Permit (CWDP). Since Afro Fishing proposed to increase the daily volume discharge, an amendment application process must be undertaken. It is the responsibility of Afro Fishing to demonstrate that the increased volume will not have a significant impact on the receiving marine environment. An investigation must be conducted to determine how the increase in discharge volume will affect the compliance with the conditions of the existing CWDP.		<p>Cape EAPrac: An amendment application for the CWDP will be undertaken in the event that this application is granted authorisation. This application will provide the details for how the increased volume and protein removal of the existing cannery will be improved. Afro Fishing is currently complying with their existing CWDP, the improved protein removal will mean that the limits for certain criteria in the permit will be even less than specified.</p>
Kindly note that the department reserves the right to revise our initial comments and we may request further information based on any additional information that may be received.		<p>Cape EAPrac: So noted.</p>
Du Pisani, Charl - Private		
Registered as I&AP at public meeting / information session		Registered 20 November 2019
Draft Basic Assessment		
My feedback / comments / questions are in my personal capacity as a resident in the "Bo-Dorp" of Mossel Bay:		

COMMENT / ISSUES	RESPONSES
<p>• Effluent discharge: It was mentioned that the Hartenbos ETP can handle the additional effluent. Does it include the effluent from the new fishmeal factory? Or will the additional effluent from the fish meal process be discharged into the ocean (currently a pipeline into the harbour area and another pipeline to outside the harbour area)? If it is discharged into the ocean, will the additional volume be “absorbed” in the volumes stated in the current licences, or will an additional license be required?</p>	<p>Cape EAPrac: The effluent that will be treated at the Hartenbos wastewater treatment works, is the sewage effluent from toilets and wastewater that may not be discharged to sea. The discharge that will go to the sea is water from boat holds that contain fish, scales and protein. This water goes through multiple screens to remove large pieces. The proposed facility will recirculate this water several times in order to remove as much protein as possible as this is needed for the fishmeal. The additional volume to be discharged will be seawater abstracted from the sea, used for cooling and then discharged back into the sea. This additional volume will form part of an application to the DEA: Oceans and Coasts to amend the existing license.</p> <p>Afro Fishing: Afro Fishing has permits and permissions to discharge water into the sea and to discharge effluent and sewerage through the municipal sewerage system. These discharge conditions must be complied with as per any other business or home in Mossel Bay</p>
<p>• RTO Operation: The RTO is specialized equipment. What will be the minimum qualification of the person responsible to operate the RTO, e.g. degree in Engineering, etc.? Where will the person responsible for the RTO receive his / her training? Will this person have the authority to stop production if the RTO has any problems? What is his / her title? Where will this position fit into the organogram? Does Afro Fishing have any other fishmeal factories in South Africa? If yes, will they implement RTO in those factories as well?</p>	<p>Afro Fishing: The RTO system is actually a very basic piece of equipment. It is easier than a boiler to operate. We therefore envisage an operator with minimum matric and preferably with some mechanical/electrical training or trade to oversee the equipment and the PLC driven control system. This operator plus the plant supervisor and manager will be trained by the RTO supplier. There will be procedures established whereby depending on various plant conditions the RTO will be stopped or started etc. As this is a critical piece of equipment there will be automated alarming created which could feed directly to the MD and factory engineers phones and/or computers should an irregularity occur. Afro Fishing does not have other fish meal factories in South Africa. The other factories on the West Coast meet their air quality permit conditions without RTO systems. These factories will have to decide themselves whether they also invest in RTO plant.</p>

11-Dec-19

COMMENT / ISSUES	RESPONSES
<p>• Change of management / ownership</p> <p>We have recently experienced the increase in odours when another fishmeal factory in Mossel Bay changed hands in terms of ownership.</p> <p>What measures are in place to ensure that the proposed factory's standards are adhered to when there is a change in ownership or management?</p>	<p>Cape EAPrac:</p> <p>Any licenses issued for the facility are issued to specific companies and responsible person. If the company changes hands, the new owner has to apply to have the license changed into their name and in doing so, accept all the conditions and requirements of the licensing. If the new owner does not comply, then the license can and will be suspended / retracted.</p> <p>GRDM:</p> <p>If the plant is transferred to a new owner(s), or the CEO is replaced, the Licensing Authority is reserving the right to test the new owner(s) and / or CEO against the criteria for a fit and proper person and may refuse the transfer if the new owner(s) and or CEO is not fitting the required criteria.</p> <p>Afro Fishing:</p> <p>As per above. Please note however that the other plant in Mossdustrya was an offal processing plant that did not process fresh fish.</p>
<p>• Licensing authority</p> <p>The Garden District is fortunate to have a very good Air Emissions Officer (Johann Schoeman), that ensure that Air Emission License conditions are met. However, in areas of Mpumalanga (where coal power stations are present) no Air Emission Licenses are in place.</p> <p>Comment: If the Licensing authority in the Garden Route deteriorates (e.g. due to officials leaving), the Public has no assurance that the Department of Environmental Affairs will come to their aid if licensing conditions are not met at the proposed fishmeal factory.</p>	<p>Cape EAPrac:</p> <p>Once a license is issued, the holder has to comply with the requirements. In the event that specific individuals leave, that does not mean that the requirements change. The public is still able to insist on compliance. The recommendations to have a forum that comprises of authorities, members of the public and the applicant will also aid in managing compliance.</p> <p>Afro Fishing:</p> <p>For 13 years Afro Fishing has been a compliant and 'good' neighbour. In fact, when I moved to Mossel Bay and introduced myself as the new MD of Afro Fishing, not one person knew who Afro Fishing was. This was a clear indication that Afro Fishing has had a low impact on its environment and neighbours. There intention is to keep it this way.</p>
Du Plessis, Andre - Private	
Registered as I&AP	Registered 11 December 2019
Draft Basic Assessment	

COMMENT / ISSUES	RESPONSES
<p>My residence is situated in a direct line above the Harbour with the best North / Sea and Mountain view in the whole of RSA . The development will have a direct impact on the future value of my property due to /;</p>	
<p>INCREASED NOISE LEVELS FROM ADDITIONAL FACTORIES</p>	<p>Afro Fishing: The noise levels will not be more than that already emanating from the harbour and surrounds.</p>
<p>INCREASED HEAVY VEHICLES MOVING IN AND OUT . CONTINUOUS REVERSE BUZZERS ON TRUCKS AND FORKLIFTS .</p>	<p>Afro Fishing: The traffic impact assessment discusses these impacts in detail and the LOW impact envisaged. No activity will be embarked upon that does not fall within the precinct zoning and Port of Mossel Bay permissions.</p> <p>Urban Engineering Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility is located within a working harbour.</p>

COMMENT / ISSUES	RESPONSES
<p>TO ENTERTAIN 1000 TONS OF FRESH FISH PER DAY , YOU WILL REQUIRE 25 ADDITIONAL DIESEL POWERED FISHING VESSELS AT CURRENT AVERAGE OF 40 TONS PER VESSEL . THEY ALL NEED DIESEL AND MAINTENANCE . YOU WILL ONLY UNDERSTAND THE IMPACT ON NOISE LEVELS , IF A PROPER STUDY IS UNDERTAKEN , THAT WILL INCLUDE POLLUTION LEVEL INCREASE .</p>	<p>Afro Fishing: The design capacity is 1000 t.p.d to cater for the very good fishing nights. These may only comprise 20-30 fishing nights in the year. For the rest of the season boats bring in what they can find. A large pelagic trawl vessel can catch 600 tons +. The smaller purse seine trawlers can catch 100-250 tons. We therefore envisage a scenario of about 3-5 fishing vessels servicing the factory.</p> <p>There is already that many and more fishing vessels servicing the cannery when there is fish caught in Mossel Bay waters. The Port of Mossel Bay has a major fishing component and hence it is normal for trawlers to be productive in the harbour. This is actually good for the economy as fishing crews must be paid, local service/maintenance companies benefit and the harbour is better utilised. Diesel is purchased, etc. Currently the harbour is at best 20% utilised. The Portnet strategy is to increase this utilisation factor.</p> <p>Excessive noise is a nuisance and must be managed and mitigated. However if normal day-to-day sound (such as the sound on our roads and in our schools) are to stop industry then the Port of Mossel Bay may as well be decommissioned. This will force the closure of the oil and gas industry, the fishing industry and any other of the Portnet growth opportunities listed in their long term planning documents.</p> <p>There will be no increase in noise or activity above that of I&J when they still occupied the premises. In fact, there will be less sound as certain motors will be sound proofed.</p>

COMMENT / ISSUES	RESPONSES
<p>A PROPER MARINE IMPACT STUDY NEED TO BE UNDERTAKEN TO DETERMINE THE INCREASED ACTIVITY IN AND AROUND THE HARBOUR , AND WHAT EFFECT IT WILL HAVE ON MARINE LIFE .</p>	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Fishing resources are already managed under the MRLA (Marine Living Resources Act).</p>

COMMENT / ISSUES	RESPONSES
<p>THE AIR QUALITY REPORT IS A ONE SIDED REPORT WITH NO SUBSTANCE AS IT WAS NEVER DONE OVER A LONG PERIOD THAT INCLUDE DIFFERENT POLLUTANTS , WIND CONDITIONS ETC .</p>	<p>LAQS: That is not correct. In anticipation of reactions from the public in general, LAQS focused on odorous emissions from the proposed factory, i.e. TMA and H2S. However, the emissions and impact of PM10 particulate matter, SO2 and NO2 were also included in LAQS's assessment. As is required by the Regulations Regarding Air Dispersion Modelling, as published in Government Notice R.533 of 11 July 2014, three years' hourly data (approximately 26 200 hours' data) of the required weather parameters were used in the dispersion modelling process.</p>

COMMENT / ISSUES	RESPONSES
<p>11-Dec-19</p> <p>IT IS VERY WORRYING THAT THE IMPACT ON CURRENT AND FUTURE TOURISM HAS NOT BEEN INCLUDED IN THE INNIAL REPORT . I WOULD STRONGLY SUGGEST THAT A TOURISM REPORT IS ADDED TO THE EIA ? THE NEW WATERFRONT DEVELOPMENT WILL BE AFFECTED NEGATIVELY .</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
	<p>MPBS: The impact on tourism is difficult to quantify as there are multiple factors that influence visitor behaviour. The current fish meal factory operating at the V&A Waterfront in Cape Town has shown that it could effectively operate within an area frequented by tourists with no negative impact - provided that no foul odours are produced. If all the precautionary and mitigation measures are implemented and introduced by Afro-Fishing, this could also probably be the case for Mossel Bay. This is an operational matter that if dealt with correctly, would not affect the tourism industry of the area.</p> <p>Afro Fishing: There seems to be a perception in Mossel Bay that the harbour must only become allocated to tourism and some large waterfront development. It is my view that this will not be economically viable and is probably why the Port of Cape Town and other harbours are 'mixed use' developments. Fishing, industry, oil and gas, shipping, Portnet, waterfront, yacht club, boat building/repairs, tourism, etc. all co-exist in 'working harbours' to make them economically viable. The more activity in a working harbour, the more successful such a waterfront development will be.</p>
<p>OUR OLD ROAD INFRASTRUCTURE WAS NEVER DEVELOPED TO COMPLY TO THE NEW REQUIREMENT FOR HEAVY VEHICLES .</p>	<p>Urban Engineering All road infrastructure has a design life. If the infrastructure is old, it needs to be upgraded. A pavement management plan is maintained by the local roads authority for such purposes.</p>
<p>I MADE A POINT AT THE LAST MEETING THAT ALL IMPORTS FROM MOROCCO , ARRIVING BY ROAD FROM PE HARBOUR , ARE OVERLOADED BY AT LEAST 6 TO 8 TONS PER CONTAINER !!!THEY ALL ARRIVE AT NIGHT IN ORDER TO BYPASS THE WEIGHBRIDGES ON ROUTE ! IN ORDER TO VERIFY MY ACCUSATION , YOU MAY REQUEST DELIVERY DOCUMENTS FROM AFRO FISHING AND THE TRANSPORTER IN QUESTION .</p>	<p>Afro Fishing: Firstly, there will be no imported raw material sourced for the fish meal plant. All the fish processed by the fish meal plant will be fished locally. Secondly, the imported containers supply the existing cannery operation and these containers are not 6-8 tons overweight. The entire local pilchard canning industry imports raw material in the same way and in compliance with the requirements of the shipping lines.</p>

COMMENT / ISSUES	RESPONSES
<p>THE INFORMATION WITH REGARDS THE FISHROT SCANDAL , AND DIRECTORSHIPS ARE A SERIOUS MATTER AND NEED TO BE CLARIFIED BY ALL PARTIES CONCERNED .</p>	<p>Afro Fishing: The “fish rot” scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>
Du Plessis, Charles	
Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document	
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 746 94 868">25-Mar-19</p> <p data-bbox="114 555 1066 619">The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.</p>	<p data-bbox="1099 240 1256 268">Cape EAPrac:</p> <p data-bbox="1099 280 2168 379">Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p data-bbox="1099 427 2152 783">In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p data-bbox="1099 831 1245 858">Afro Fishing:</p> <p data-bbox="1099 871 2096 935">There will be no discharges of a polluting nature. This is why there are Coastal Discharge Permits. They are there to regulate all discharges.</p>

COMMENT / ISSUES		RESPONSES
	Concerned about the effect of the odour on the people in the CBD, the economy and the tourism industry.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The technology that will be applied is the best available in the world. Nowhere in its application in fishmeal production has it resulted in the emission of odorous gases.</p> <p>Afro Fishing: There are no harmful emissions from this installation as already determined by CSIR and other research institutions. Any odoriferous odours will be put through the RTO plant as described above.</p>
Du Plessis, Minda - Private		
	Registered via email	Registered 12 December 2019
Draft Basic Assessment		
	Please register me as a concerned and affected party for the above development.	
	I am totally against any development in the harbour that could have a negative influence on the future of Tourism and small business development on Mosselbay. Job creation is very important to me , however , it must not have a long term negative effect on development. We all know that Mosselbay is a underdeveloped Gem for Tourism , and not for a Fishmeal and Oil factory !	<p>MPBS: The fish meal factory operating at the V&A Waterfront in Cape Town has shown that it could effectively operate within an area frequented by tourists with no negative impact. If all the precautionary measures are implemented as undertaken by Afro-Fishing, this could also be the case for Mossel Bay.</p> <p>Afro Fishing: There seems to be a perception in Mossel Bay that the harbour must only become allocated to tourism and some large waterfront development. It is my view that this will not be economically viable and is probably why the Port of Cape Town and other harbours are 'mixed use' developments. Fishing, industry, oil and gas, shipping, Portnet, waterfront, yacht club, boat building/repairs, tourism, etc. all co-exist in 'working harbours' to make them economically viable. The more activity in a working harbour, the more successful such a waterfront development will be.</p>

COMMENT / ISSUES	RESPONSES
<p>12-Dec-19</p> <p>The impact on the Marine life must play a major role before any decision is made .</p>	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Fishing resources are already managed under the MRLA (Marine Living Resources Act).</p>

COMMENT / ISSUES	RESPONSES
<p>Pollutants from the factories , heavy transport and increased fishing vessels are not properly addressed in your initial report . Please also consider the fact that the current so called work force at Afro is run via a Labour Broker , that lives in Pretoria. No permanent positions are created and this is not addressed in the report.</p>	<p>Afro Fishing: The traffic impact study provides detail as to why the impact on the roads is actually going to be LOW.</p> <p>There will be no pollutants from the factory as is currently the situation. All discharge permits are in place and will be complied with.</p> <p>The work force is not managed by a Pretoria based company. A local company is used to manage the seasonal compliment. This project will increase both the seasonal and permanent employee compliments.</p>
<p>There are many suggestions in place to develop Mosselbay in the near future : Open Air Markets , closing of Marsh street for traffic , pavement markets with arts and craft , entrance for large Passenger Liners etc . Why must we play with Fire and have less Tourists , less Fish , No Shark Cage Diving , No Whales etc.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: This is a statement. Once again it is necessary to reference sites and locations where effective measures, if implemented correctly and sustained, would not impact on tourism. The fish meal factory operating at the V&A Waterfront in Cape Town has shown that it could effectively operate within an area frequented by tourists with no negative impact. If all the precautionary measures are implemented as undertaken by Afro-Fishing, this could also be the case for Mossel Bay.</p> <p>Afro Fishing: This factory will have no impact on markets, arts and craft industry, future passenger liner activity, tourism, shark cage diving or whale activity. In fact, the plant will contribute positively to the Mossel Bay economy and job creation as such fishing companies do for all other port/harbour towns/cities in the country.</p>

COMMENT / ISSUES	RESPONSES
Du Plessis, Jabram - Maak Suid-Afrika Mooi	
Registered via email	Registered 12 December 2019
Draft Basic Assessment	
I would like to be registered as an interested and affected person.	<p>Cape EAPrac: Thank you very much for your email. I have registered you as an Interested & Affected Party (I&AP) for the Environmental Impact Assessment process. This will ensure that you receive all future correspondence relating to this application.</p> <p>All comments are being collated and responses will be provided in due course. The updated Comments & Responses table will be circulated to all registered I&APs early in the new year.</p> <p>Please feel free to review all available documentation on the website link .</p>
I head-up a movement MAAK SUID-AFRIKA MOOI. Environmental issues are one of my movement's focus areas.	
I currently live in George. I am in the process of setting-up a new movement called HOU MOSELBAAI MOOI. It's core aim will be to preserve Mosselbay as an attractive coastal village for tourism. I regularly spend time in Mosselbay.	
I use to live in Houtbay. So, I have first hand experience of the negative impact a fishmeal and oil processing factory has on a coastal town. The proposed factory will have a negative impact on Mosselbay as a coastal village.	<p>LAQS: The factory in Hout Bay (which has since closed due to commercial reasons) did not employ RTO technology, but relied essentially on sea water scrubbers to reduce odorous emissions. In later years chemical scrubbers were installed which were more efficient, but not as effective in reducing odorous emissions as RTO technology. Emissions from RTO units have been proven to be extremely low, resulting in no discernable odours in the area.</p>

	COMMENT / ISSUES	RESPONSES
12-Dec-19		<p>Afro Fishing: Firstly, the fish meal plant in Hout Bay did not have a negative impact on the tourism industry in Hout Bay. The tourism sector has actually grown even with a fish meal plant in the harbour. Secondly, the Hout Bay factory did not have a RTO plant. With the RTO plant planned for Mossel Bay, all offensive odours will be removed.</p> <p>An important point that needs to be raised about Hout Bay is that crime, poaching and unemployment increased considerably with the big companies closing down their Hout Bay operations. I&J, Sea Harvest, Oceana and many other smaller companies left Hout Bay over the recent years. This has had a massive impact on property prices and other socio-economic factors. Until today no other labour intensive industries have located themselves in Hout Bay and replaced the big companies that left. Many Hout Bay harbour buildings are now battened closed and in a dilapidated state similar to the I&J buildings in Mossel Bay that has been unused for at least 8 years. This is not economic development.</p> <p>I do also need to ask where all the tourists are going to come from in Mossel Bay? Hout Bay was on the main tourist route for visitors to Cape Town and surroundings. The route being CT-Hout Bay-Cape Point-Kirstenbosch-CT. Then there are many other tourist attractions and routes (Waterfront, Robben island, wine farms, Table Mountain, etc.) There is even an international airport feeding the numbers. Yes we all want the tourist numbers to increase in Mossel Bay but MB is no Cape Town and as stated above a fish meal plant is not going to reduce the tourism numbers.</p>

COMMENT / ISSUES	RESPONSES
<p>The harbour is a tourist attraction, and it's character and recreational enjoyment will be negatively affected by the construction and operation of the proposed factory.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>Afro Fishing: Fortunately there is no tourism or other activity in the fishing zone of the Port of Mossel Bay, so the construction activity will not impact tourist attractions. Any construction will be managed in the same way as the Portnet complex development and the new office development in Marsh Street.</p> <p>DELplan: The Port of Mossel Bay was not developed to be a tourist attraction. It was developed for the oil and fishing industry. Throughout the TNPA's plans, the Waterfront and the tourist facilities are only for a portion of the harbour and the eastern part of the harbour will remain for fishing industries.</p> <p>Furthermore, the IDP and SDF of Mossel Bay Municipality supports the further development of the already existing industries in the harbour and welcomes the development of the Waterfront on the western side.</p> <p>Lastly, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples across the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>
<p>Du Plooy, Bertram - Former MCEN Marine Coastal Education Network educator</p>	
<p>Registered as I&AP at public meeting / information session</p>	<p>Registered 20 November 2019</p>
<p>Draft Basic Assessment</p>	
<p>Listing my complaint:</p>	

COMMENT / ISSUES	RESPONSES
<p>The unavoidable generation of one pall of black smoke in the harbour shall be visible to all tourists, enough to scare them away for good</p>	<p>LAQS: There are already visible emissions from Afro Fishing's boiler when it starts up. In addition, frequent visible emissions occur from other sources in the area, e.g. Nestle's boilers, tankers anchored in the bay, diesel exhaust emissions from motor vehicles (some of which are from tourists themselves!), veld fires, burning of waste, etc., and none of these seem to have any effect on tourism.</p> <p>Afro Fishing: There is on occasion black smoke when the boiler is fired up for the first time. This is not harmful and the smoke stops within minutes. I am sure tourists are not going to be scared away by such normal industrial activity. According to the Eden District AQMDP (Air Quality Management Plan) there are far more serious pollutants in the Eden District to be concerned about.</p>

COMMENT / ISSUES	RESPONSES
<p>12-Dec-19</p> <p>No Marine Impact Study has been done, with specific reference to the pelagic fish source for the factory.</p>	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: There are other government departments and scientific groups who ensure that our oceans are sustainably fished.</p>
<p>From where will the fish be imported, from Namibia or Morocco? If so, then why situate the factory in our tourist and business environment?</p>	<p>Afro Fishing: All the fish processed by the fish meal plant will be locally fished.</p>

COMMENT / ISSUES		RESPONSES
	How does the Namibian Fish rot scandal impact on our local fishing business and communities?	<p>Afro Fishing: The “fish rot” scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>
Du Toit, Ginny - Private		
	Registered via email	Registered 12 March 2019
Background Information Document		
	Please find attached my completed MOS565.01 Bid Form. I have carefully read the EIA and am extremely concerned about the impact of a Fish Meal Factory so close to all amenities in Mossel Bay town. We are a small town who rely heavily on the tourism industry as well as having a fairly high population of retirees.	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6: if the proposed mitigation measures are implemented, there should be very little - if any - negative impact on tourism.</p>

COMMENT / ISSUES	RESPONSES
<p>I feel that if AfroFishing need another factory they should extend the present one in Mossdustria. Pollution worldwide is a major problem which needs to be addressed not added to! All members of the Tourism and Hospitality industry, Health facilities, Retirement Complexes and in fact all Ratepayers of the Mossel Bay Municipality should be made aware of and asked to comment on this proposed Fish Meal factory.</p>	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p>
<p>Pollution of the environment.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: There will be no discharges of a polluting nature. This is why there are Coastal Discharge Permits. They are there to regulate all discharges.</p>

COMMENT / ISSUES		RESPONSES
12-Mar-19	Pollution of the air.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p>
	Affect on Tourism.	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6: if the proposed mitigation measures are implemented, there should be very little - if any - impact on tourism.</p>
	Ripple effect on surrounding areas due to wind.	<p>LAQS: Air pollutants emitted from a source disperses into the atmosphere, the degree of which is determined by prevailing weather conditions. Wind direction dictates in which direction dispersion occurs while other parameters, e.g. wind speed, air temperature, solar radiation, upper-air stability, etc., determines the degree of dispersion that occurs. Generally, the worst dispersion conditions occur under very stable air conditions, usually manifested early in the morning during incidents of virtually no wind. Emissions then tend to stay fairly concentrated with maximum ground-level concentrations occurring in the immediate vicinity of the source. Even under such conditions the dispersion model does not predict any discernible odours in the area.</p> <p>Afro Fishing: The Air Pollution impact Study explains the dispersion expected. These are not significant with the inclusion of the RTO unit.</p>

COMMENT / ISSUES	RESPONSES
<p>I am a resident and concerned citizen. Mossel Bay has always been a clean town and relies heavily on tourism. I believe that no matter how much precaution is in place, that it will contaminate the clean air and cause respiratory problems for the many retirees living here as well as the smell.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Afro Fishing: CSIR research has already proven that there are no harmful components emanating from fish meal plants. If there were then there will be no such plants operating in South Africa. The issues are related purely to odour. The intention is to maintain Mossel Bay as a clean town by employing Best Available Technology.</p>
<p>Perhaps a factory ship out at sea could process and pack the fishmeal.</p>	<p>Afro Fishing: Factory ships of this nature are not viable due to the low price of the finished products compared to factory ships that process and freeze fish for human consumption purposes.</p>

COMMENT / ISSUES	RESPONSES
<p>Use the current one in Mossdustria.</p>	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The plant at Mossdustria has recently had its Air Emissions License (AEL) revoked for non compliance. Afro Fishing was a client of this facility but currently takes its cannery offal to Atlantis.</p> <p>Afro Fishing: The plant in Mossdustria is an offal processor which does not use fish meal and oil processing methods. This plant also has no odour abatement systems installed. As noted above it will be unviable to locate the fish meal plant outside the harbour.</p>
<p>As an individual and pensioner I am not in contact with stakeholders, but feel that all in the tourism business, the retirement villages and health sectors should be involved in this process.</p>	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6: if the proposed mitigation measures are implemented, there should be very little - if any - impact on tourism.</p> <p>Afro Fishing: As explained above, the plant will contribute to the MB economy and have no impact on the health of its residents and the tourism sector.</p>
<p>Duncker, Bert - Private</p>	
<p>Registered as I&AP</p>	<p>Registered 12 December 2019</p>

COMMENT / ISSUES		RESPONSES
12-Dec-19	2. The increased heavy vehicle traffic will cause high noise levels and disturbance in this quite town.	<p>Afro Fishing: Please note the Traffic Impact Study in this regard and the resulting LOW impact envisaged.</p> <p>Urban Engineering Kindly refer to the Traffic Impact Study in this regard</p>
	3. The increased heavy traffic loads were never planned for on the road infrastructure and access and safe parking for trucks is of concern.	<p>Afro Fishing: Please note the Traffic Impact Study in this regard and the resulting LOW impact envisaged.</p> <p>Urban Engineering A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>
	4. The increased noise levels of the additional boats bringing in the 1000 tons of fish per day will have a high negative impact on the tourism of the town.	<p>Afro Fishing: There will be no increased activity more than when the old I&J factory was still operational and no negative impact on the tourism industry as noted above and in the Socio and economic 'impact' study.</p>
	5. The increased noise levels of the proposed plant should be determined as well as the pollution it will result.	<p>Afro Fishing: As noted above and in the many impact studies and reports.</p>
	6. The EIA reports are based on assumptions and no actual tests were conducted.	<p>LAQS: This statement is not true. While no such measurements were done in South Africa (because no RTO unit is in operation in the country), the emissions used in LAQS' assessment were measured values at two fishmeal factories that use RTO technology. The measurements were conducted by independent accredited companies that specialise in emission measurements.</p> <p>Afro Fishing: The reports are based on facts, desktop studies and experience. In fact, actual tests were done on two EU factories using the same technology.</p>

COMMENT / ISSUES		RESPONSES
	There is further public participation and investigations required before approval for this development can be granted.	Cape EAPrac: Please note that this proposal has been advertised and circulated to the public since February 2019. The comment period on the Draft Basic Assessment Report of 12 November to 12 December is part of the legislated timeframes provided by the NEMA EIA Regulations. The application process follows prescribed statutory timeframes based on the proposal presented. It must be noted Afro Fishing does not will be applying for any fish quotas and the application at hand is for the construction of the facility in the Port of Mossel Bay.
	It is of vital importance that we preserve our coastlines and our heritage for our future generations. I trust that this development will be put on hold.	Cape EAPrac: Thank you for your participation in the EIA process. Your comments will be included in the Final Basic Assessment Report to be submitted to the competent authority as required by the NEMA 2014 EIA Regulations.
Edwards, L - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Edwards, Heather- Private		
	Registered by Chantel Edwards-Klose	Registered 27 February 2019
Edwards, John Daniel- Private		
	Registered by Chantel Edwards-Klose	Registered 27 February 2019
Edwards-Klose, Chantel- Private		
	Registered via email	Registered 27 February 2019
Background Information Document		
	Opposed to establishment of such a fish meal factory in central Mossel Bay. Will have massive impact on tourism and impact value of houses in CBD.	MPBS: Refer to SIA section 8: Assessment of impacts, in particular sections 8.3.6 and 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on tourism and property values.

COMMENT / ISSUES	RESPONSES
<p>27-Feb-19</p> <p>Regardless of so-called technology, apart from the processing plant, the delivery of raw content to be processed will add to traffic congestion, leaking trucks with blood etc. cause flies, bad smell throughout CBD. We have been through this when a number of pilchard vessels were fishing out of Mossel Bay harbour and the general smell around the CBD was disgusting. Potential for spills – this has happened with a truck losing it’s load down Marsh Street – (Park Side West).</p>	<p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: The raw fish will be pumped from boats moored inside the harbour directly into the factory and will not be transported by road. The fish will be preserved at sea using either RSW (refrigerated sea water) or CSW (chilled sea water). Old fish will not be processed by the factory.</p> <p>The finished products (fish meal and fish oil) will be despatched from the factory in sealed containers. Eventually when the Port of Mossel bay has been expanded to cater for imports and exports, the finished product will not even be trucked from the harbour. All will happen within the harbour confines and have no consequence on the CBD and community.</p>

COMMENT / ISSUES	RESPONSES
<p>If the same company was forced to close down in Mossdustrria due to smell - which is an industrial area, then how on earth can it even be a consideration for the CBD of Mossel Bay.</p>	<p>Cape EAPrac: Afro Fishing is not the same company as the Mossdustrria plant. That is owned and operated by Southern Cape Fish Meal (Pty) Ltd. The Afro Fishing plant will make use of the latest and most efficient technology available, including design and construction of industry specific building. This eliminates problems associated with retrofitting older buildings and machinery to achieve specific goals.</p> <p>The Mossdustrria operation processes offal and ostrich carcasses, much of which can be several hours to days old. The new AF facility will only process fresh fish.</p>
<p>Potential for environmental hazards in terms of pollution of Santos Beach, Munro's Bay and De Bakke Beach.</p>	<p>Cape EAPrac: The existing coastal water discharge permit (CWDP) will be amended to include a greater volume, however, since a fish meal and fish reduction facility is aimed at optimising and collecting all the protein and oil, any effluent that is to be discharged will be made up almost entirely of distilled steam.</p> <p>The existing CWDP has specific monitoring conditions that are ongoing for the life of the facility and the discharge will continue to meet those thresholds.</p>
<p>Completely contradictory with envisaged waterfront development as well as existing business and homes.</p>	<p>Cape EAPrac: The harbour is a working harbour and only a portion to the west is envisaged for the so called waterfront development. The location of the current Afro Fishing Cannery and the proposed fishmeal and oil reduction facility is located on the harbour precinct designated for commercial fishing and processing purposes. Thus there is no contradiction in land use for the site.</p>
Elhers, Louise- Private	
Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document	

COMMENT / ISSUES		RESPONSES
<p>Over fishing in our bay.</p>	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Fishing is a controlled and sustainable industry managed by the Department of Fishing, Forestry and Agriculture. No over fishing practises are tolerated in their models and management of the industry.</p>	
<p>25-Mar-19</p> <p>Pollution possibilities the industry will have on the environment, sea, local people and guests.</p>	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p>	

COMMENT / ISSUES		RESPONSES
		<p>LAQS:</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using emission factors published by the United States of America's Environmental Protection Agency (USEPA), shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
Engelbrecht, J.H. - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Erasmus, Pieter- Beacon Point Body Corporate		
	Registered via email	Registered 7 March 2019

COMMENT / ISSUES		RESPONSES
07-Mar-19	Beacon Point is a sectional title development, located in the near proximity of the proposed fish meal factory to be established on the old I&J premises. Beacon Point consists of 72 flats, and as such Beacon Point is an interested and affected party.	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Afro Fishing: The Port of MB and its fishing activities have been a feature of MB since inception of the town. This project will work within the zoning scheme and spatial allocation of the current Municipal and Portnet precinct planning. There is no change to the use of the site which has always been and remains FISHING ACTIVITIES.</p> <p>The Beacon Point development was established and marketed knowing that it neighboured on a working harbour and was established when I&J was active on the site.</p>
	Beacon Point wishes to be registered as an interested and affected party and to be provided the opportunity to review and comments on the Basic Assessment Report (BAR) and Environmental Management Programme (EMPr).	<p>Cape EAPrac: Thank you for your participation, you have been registered as the representative for Beacon Point.</p>
Falanga, Guido -Symphony Terrace Body Corporate		
	Registered as I&AP	Registered 22 November2019
Draft Basic Assessment		
	As a resident/owner and Chairman of the Body Corporate at Symphony Terrace, 70 Bland street, Mossel Bay, I would like to record my/our objection to the proposed Fishmeal factory in the harbour area of Mossel Bay.	
	The main reasons for the objection are as follows:	

COMMENT / ISSUES		RESPONSES
12-Dec-19	<ul style="list-style-type: none"> • Potential objectionable odours. 	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using emission factors published by the United States of America's Environmental Protection Agency (USEPA), shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
	<ul style="list-style-type: none"> • If factory works shifts, the night-time disturbance is unacceptable, E.g. reverse alarms of forklifts/trucks; bright lights, operational noise. 	<p>Afro Fishing: These activities already form part of the existing cannery operation and there are no noise pollution complaints. Forklifts require reverse beepers by law. Afro Fishing has already reduced the sound level of these beepers to the minimum allowed. Recently, I did receive a complaint for reverse beeping only to realise it was due to a large forklift used on the Portnet Building construction site.</p> <p>It is envisaged that forklifts will operate mainly indoors during night shifts. The layout was also purposefully designed to have the cold room and warehouse neighbouring the residential developments on the NW side of the harbour. This way there is a buffer between the processing operations and the surrounding areas.</p>
	<ul style="list-style-type: none"> • Increased heavy vehicle traffic along Bland street (in front of Symphony Terrace). This creates noise, congestion and road infrastructure degradation. 	<p>Urban Engineering Kindly refer to the Traffic Impact Study in this regard. Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility is located within a working harbour. A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>

COMMENT / ISSUES		RESPONSES
	<ul style="list-style-type: none"> • Has the availability of fish for this purpose and the effect on the fish stocks been scientifically studied? 	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Yes, this is performed by the Department of Fisheries and the various scientific working groups.</p>
	<ul style="list-style-type: none"> • In the event that the project is approved, will there be conditions set, failing which the permit/licence to operate will be withdrawn? 	<p>Cape EAPrac: The licensing conditions associated with such a development will be very strict and the licensing authority has the right to retract the license if the applicant does not comply. In addition, Air Emissions Licenses have to be renewed every five years and submit monitoring data on a regular basis. Thus should the project go ahead, any "promises" (commitments) made by the applicant will be legally binding and cannot be ignored.</p> <p>Afro Fishing: Yes, Afro Fishing is expecting an onerous set of permit conditions which will have to be complied with if the project gets a green light.</p>
Falanga, Sandra - Private		
	Registered as I&AP	Registered 22 November 2019
Draft Basic Assessment		
	Herewith issues of concern and comments:	

COMMENT / ISSUES	RESPONSES
<p>1. Unpleasant odours: Unacceptable fishy odours from the harbour region is already a reality.</p>	<p>Cape EAPrac: Please remember that the Port of Mossel Bay is a working harbour that is home to many different industries. It must be noted that even if this project is not approved, the harbour will not cease to be an industrial and commercial hub.</p> <p>LAQS: There are existing sources of odours in and around the harbour. These will continue to exist whether environmental authorisation for the fishmeal plant is given or not. LAQS is of the opinion that the proposed plant will not add any odours to the mix.</p>
<p>2. Unacceptable noise levels (at all times) and light pollution (night-time): These too are an uncomfortable reality. As it is the harbour is already noisy and lit up during the night. It is not unusual to be woken up at night by noise in the harbour.</p>	<p>Cape EAPrac: Please remember that the Port of Mossel Bay is a working harbour that is home to many different industries. It must be noted that even if this project is not approved, the harbour will not cease to be an industrial and commercial hub.</p> <p>DELplan: The zoning of the harbour is Transport Zone I: Transport use. Certain industries exist for many decades in the harbour. Thus, it can be argued that the argument is invalid since the zoning for the harbour to operate with certain noise levels are within the rights. The proposed development will install the necessary equipment and will take precautions to minimize noise pollution as mitigation.</p>
<p>3. Increased road traffic: Streets are narrow and at times congested. Heavy vehicles often straddle oncoming lanes, turning radius at intersections is limited and additional noise and maintenance (& costs towards maintenance, ultimately to be carried by the local community) can be foreseen. I live here and experience it all the time!</p>	<p>Urban Engineering Kindly refer to the Traffic Impact Study in this regard. Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility that is located within a working harbour. A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>

COMMENT / ISSUES	RESPONSES
<p>4. Points one to three indicate a conflict in compatibility with the surrounding area's residential and tourism presence. One can only wonder at the vision of the local authority to promote an increased industrial presence here.</p>	<p>Cape EAPrac: That is not the case. The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>DELplan: The area surrounding the proposed development is characterized by medium- to high-density residential developments, industrial properties, tourism facilities and businesses. It can be argued that the harbour area was initially developed for transport purposes (with ancillary uses), but over time residential developments developed around the subject property due to the unique location.</p> <p>Thus, the harbour was developed long before the surrounding residential developments. The owners who invested in residential properties located close by the harbour knew the area and had to investigate how the development of the harbour would affect them individually.</p> <p>Lastly, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples across the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES		RESPONSES
<p>5. As a retired resident, an investment of faith in the town’s future and an economic investment as property owner have been made. What guarantee is there for residents or tourism-related enterprises in the surrounding area if the presence of the proposed fishmeal facility has a negative impact on these activities, property values and lifestyle?</p>	<p>MPBS: that the precautionary measures envisaged by Afro-Fishing are implemented, the probability of negative consequences arising from the factory is medium to low and should not negatively impact tourism, property values or sense of place. If the development is not approved, the dilapidated state of the current I&J site could be detrimental to land owners and businesses operating in the area.</p> <p>Afro Fishing: Fish meal plants have not had negative impacts on West Coast tourism.</p>	
<p>12-Dec-19</p> <p>6. There needs to be clarity and transparency about the following:</p> <ul style="list-style-type: none"> • Where is the fishmeal destined for – local markets or elsewhere? • Where will the fishing take place and by whom? Has the sustainability of the targeted fish stocks been ascertained and what controls will be in place? • Who are to be the beneficiaries of the fishing quotas? 	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: The fish meal and oil will be containerised and exported. Local fishing rights holders and boat owners will catch and supply the fish. The Department of Fisheries and scientific working groups ensure that fishing rights are allocated to maintain long term sustainability of the fish stocks. The fishing quota rights holder will obviously benefit when their fish is caught and landed to one of the fish processing facilities.</p>	

COMMENT / ISSUES	RESPONSES
<p>7. Other than traffic impacts on road infrastructure, what additional requirements will there be for resources such as energy and water? How sustainable are these? How compatible is this with a local authority who subscribes to be 'green'?! </p>	<p>Afro Fishing: The Traffic Impact Study deems the project to have a LOW impact on the road network. The new factory will use the same amount of water as was previously used by I&J, hence no water supply upgrade is needed.</p> <p>The power requirements will increase by 1900kVA. This power is confirmed to be available by Technical Services. Afro Fishing will however have to pay for the additional bulk supply and in the process will have to improve the stability of the local grid. The intention is to also install solar panels and use as much 'green' energy as is possible.</p>
<p>8. Clarification and transparency with regards to the link of the applicant with the 'Fish rot' scandal. Surely the local community as a whole would want to steer clear of alleged blatant bribery and corruption.</p>	<p>Afro Fishing: The "fish rot" scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>

COMMENT / ISSUES	RESPONSES
<p>9. Impacts on the marine environment with regards to waste-water, other waste products, shipping fuel, increased shipping movement and so on are a very real concern. The bay is used for recreation and still has a rich presence of marine life which sustains an ecosystem; supports a tourism and research component; sustains a quality of life for residents and tourists which is healthy, desirable, spiritual and in many ways still devoid from the nasty impacts of heavy industrial and economic advancements put forward in the name of so-called progress.</p>	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>MPBS: The potential negative impact of the petroleum-related activities is much more significant than that of a fish processing industry, which has been operating in the harbour for many years with no history of damage to the marine environment.</p>
<p>It is my contention that there are many gentler and kinder options available for Mossel Bay, its visitors, businesses and residents to prosper, rather than the fishmeal facility. I strongly support the no-go option.</p>	<p>Cape EAPrac: Thank you for your participation in the EIA process.</p>
<p>Public meeting / Information Session</p>	

COMMENT / ISSUES		RESPONSES
22-Nov-19	Please add us as interested an affected parties. We own properties in the direct vicinity and live right behind the harbour. Noise and light pollution (especially at night) is already an 'awake' nightmare for residents. Sometimes unwelcome fishy smells too!	<p>Cape EAPrac: Thank you for your email and I have registered you as an I&AP for this process.</p> <p>Please remember that the Port of Mossel Bay is a working harbour that is home to many different industries. It is not quite clear from your statement if you are specifying that Afro Fishing is currently responsible for the noise and light. It must be noted that even if this project is not approved, the harbour will not cease to be an industrial and commercial hub.</p> <p>Afro Fishing: In the previous 18 months there have been no complaints provided to us relating to the activities of the existing cannery operation. Bear in mind though that there are numerous other fishing operations in the harbour and the oil and gas industry is also harbour based. There is a slipway, yacht basin and numerous other activities on the go.</p> <p>The previous owner of Afro Fishing recalls no formal complaint ever being lodged and maybe a handful of verbal complaints in the previous 12 years of operation.</p>
Ferreira, Jacques - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p data-bbox="114 730 360 754">Pollution possibilities.</p>	<p data-bbox="1099 260 1256 284">Cape EAPrac:</p> <p data-bbox="1099 296 2123 395">Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p data-bbox="1099 443 2159 616">Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p data-bbox="1099 663 1245 687">Afro Fishing:</p> <p data-bbox="1099 700 2159 799">An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p> <hr/> <p data-bbox="1099 911 1167 935">LAQS:</p> <p data-bbox="1099 948 2152 1046">The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p data-bbox="1099 1094 2168 1267">The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

25-Mar-19

COMMENT / ISSUES		RESPONSES
Over fishing in our bay.		<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Fishing is a controlled and sustainable industry managed by the Department of Fishing, Forestry and Agriculture. No over fishing practises are tolerated in their models and management of the industry.</p>
The effect of smell in Mossel Bay towards tourism		<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
Ferreira, Tom - Private		
Registered as I&AP		Registered 9 December 2019
Draft Basic Assessment		
See attached formal objection to the proposed Afro Fish Meal and Fish Oil Production Facility – Mosselbay.		<p>Thank you for your email and your comments. I have registered you as an Interested & Affected Party (I&AP) to ensure that you receive all future correspondence. Your comments will be collated and responses issued in due course.</p> <p>Please feel free to review all the available documentation on our website</p>

COMMENT / ISSUES	RESPONSES
<p>As the owner of residence, Number 3 Kloof Street, Mosselbay, I will be directly impacted by the proposed Afro Fishmeal and Fish Oil reduction facility. In this regard I have the following objections and concerns:</p>	
<p>1. Increase in traffic in Kloof street. This will lead to:</p> <p>a. Increased noise 24/7 due to facility operations and support activities.</p> <p>b. Increased emissions and pollution surrounding the area due to support vehicles activities.</p>	<p>Afro Fishing: The Traffic Impact Study has indicated that this operation will have a low impact on the local road networks. There will hence be no vehicle emission pollution to be concerned about.</p> <p>Urban Engineering Kindly refer to the Traffic Impact Study in this regard. Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility is located within a working harbour. A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>
<p>2. The houses in Kloof street are protected by stringent heritage regulations. Any building changes follow a lengthy and strict approval process, which protects the historical heritage and appearance. The fishmeal facility should be governed by the same rules and regulations to protect the important heritage of the street, area and town.</p>	<p>Cape EAPrac: Heritage Western Cape has already evaluated the proposed structural changes to the existing defunct I&J site and have confirmed that no further heritage studies will be required. Please see their statement in Annexure E1 of the Basic Assessment Report.</p>
<p>3. The value of the property in Kloof street will decreased due the following reasons:</p> <p>a. Other town areas in South Africa with similar industrial facilities' value decreased.</p> <p>b. Negative stigma associated with an industrial production site.</p> <p>c. One of the main reasons for prospective buyers to buy property in this area is the clean air and spectacular views. This will undoubtedly be impacted by the planned production facilities location and odour.</p>	<p>Afro Fishing: See the accompanying Socio and Economic Impact Study in this regard.</p> <p>MPBS: Values of real estate are driven by various factors, including supply and demand, interest rates, local economic growth and population growth rates. Our research and analysis of international case studies of the effect of fish meal plants on property values in the surrounding area, did not yield any negative results provided that the precautionary measures are implemented by Afro-Fishing to address foul odours are implemented - and thus should have no or minimal negative impact on surrounding landowners. The footprint of the proposed redevelopment will be restricted to the current Afro-Fishing and I&J sites, with similar types of activity aligned to the current operations. The fish meal production will be the main "new" activity to be introduced.</p>

09-Dec-19

COMMENT / ISSUES	RESPONSES
<p>General: An alternative proposal to create jobs and build the local economy as well as marketing the proposed Mosselbay area has been submitted to the Portnet harbour department (contact: Allision Bharna based in Power Elisabeth). This would be realised in the form of a water park entertainment and community retail area (e.g. in the form of a permanent flea market) and would potentially create and support a much larger workforce (informal and formal sector).</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: Since we were not aware of this proposal (the I&AP only registered in December 2019), we can not respond to this comment. Further investigation and analysis would be required to assess the status of the proposal and the feasibility thereof in the context of Transnet's port planning and future development. It appears that this initiative is still in its infancy. Regardless, the proposed redevelopment is located on the other side of the harbour, which is earmarked for commercial fishing activities by Transnet National Ports Authority.</p> <p>Afro Fishing: I have been introduced to this waterfront/waterpark proposal and it appears that it never got off the ground because it is not economically viable. Also, the site is not suitably zoned for such activity. Most working harbours (e.g. CT Waterfront) cater for numerous industries and tourism to co-exist. It is after all the working harbour concept that attracts tourists. I have heard that a much smaller and possibly more viable waterfront type development is however been considered for the western side of the harbour.</p> <p>DELplan: It is well-known that the Port of Mossel Bay is not fully developed to its potential. Thus, the TNPA has developed future planning of the harbour that includes commercial fishing on the eastern side and tourism development on the western side. If these two industries can be developed and be optimized, it can create jobs and improve the local economy.</p>

COMMENT / ISSUES		RESPONSES
	In conclusion, I, as the owner of a property directly affected by the proposed production facility do not support the planned Afro fishmeal and Fish oil reduction facility.	Cape EAPrac: Thank you for your participation in this EIA process.
Fisch, MS - Private		
	Registered via email	Registered 20 March 2019
Background Information Document		
10-Mar-19	As the owners of No. 2 Louisa Dorothea, Beacon Point, The Point, Mossel Bay, for the past 22 years, WE OBJECT IN THE STRONGEST POSSIBLE TERMS to the establishment of the Fish Meal Plant, Afro Fisheries.	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Afro Fishing: The Port of MB and its fishing activities have been a feature of MB since inception of the town. This project will work within the zoning scheme and spatial allocation of the current Municipal and Portnet precinct planning. There is no change to the use of the site which has always been and remains FISHING ACTIVITIES.</p> <p>The Beacon Point development was established and marketed knowing that it neighboured on a working harbour and was established when I&J was active on the site.</p>

COMMENT / ISSUES	RESPONSES
<p>We object to the intolerably unpleasant fishy smell which would be created near our upmarket residences and our quality of life would be greatly impaired. WILL NOT TOLERATE AFRO FISHERIES IN OUR AREA!!!</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: Odour will be managed as already explained.</p>
<p>Kindly regard this objection as NOT NEGOTIABLE.</p>	<p>Cape EAPrac: Thank you for your participation, your objection is noted.</p>
Fordham, Colin - CapeNature	
<p>Automatically registered as an I&AP.</p>	<p>Registered 22 February 2019</p>
Fourie, Carolina- Private	
<p>Registered via email</p>	<p>Registered 25 February 2019</p>
Background Information Document	
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	

COMMENT / ISSUES	RESPONSES
<p>I am a resident and owner of the Flowerbox in Mossel Bay. We had to just accept when the sardine factory opened here. Now we had to hear via social media how ridiculous the municipality is. We were not even personally informed.</p>	<p>Cape EAPrac: The Pre Application process was advertised in the local newspaper and Suid Kaap Burger on 22 February 2019. Site Notices were placed at various places around the outside of the TNPA property and written notices were provided to all establishments and residences on either side of Kloof and Bland streets up to the TNPA entrance off Bland Street. This is a private applicant and is not a municipality project, nor was the municipality responsible for the notifications.</p> <p>Afro Fishing: The same concerns were raised when application was made for the cannery. All sorts of impacts were anticipated then and now 13 years later Afro Fishing can prove that the concern has had zero impact on the environment and local tourism. The factory has however become one of the largest providers of employment and contributed vastly to the local economy.</p> <p>The intentions of AF were published in the local newspaper. The social media reports started after the formal notification.</p>

COMMENT / ISSUES	RESPONSES
<p>It is unacceptable to want to put such rubbish in the heart of Mossel Bay. Mossdustria has more than enough space to accommodate a factory like this.</p>	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows:</p> <ul style="list-style-type: none"> - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater. <p>The plant at Mossdustria has recently had its Air Emissions License (AEL) revoked for non compliance. Afro Fishing was a client of this facility but currently takes its cannery offal to Atlantis.</p> <p>Afro Fishing: The plant in Mossdustria is an offal processor which does not use fish meal and oil processing methods. This plant also has no odour abatement systems installed. As noted above it will be unviable to locate the fish meal plant outside the harbour.</p>
<p>You are messing with our tax payers and our money. I will not allow the value of my property to decline and will take steps to address that. I will personally submit a claim against the Mossel Bay Municipality.</p>	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on property values.</p> <p>Cape EAPrac: As explained above, the applicant is a private entity and neither the municipality nor taxpayers money is involved in this application.</p>

COMMENT / ISSUES	RESPONSES
<p>Who do you think will continue to support Mossel Bay? Believe me, it will end up like Lamberts Bay, where it stinks and is so rotten that you cannot breathe.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Afro Fishing: As in other coastal towns in SA and The CT Waterfront, where there are fish meal plants, there will be no impact on the environment.</p> <p>For your interest, Lamberts Bay does not have a fish meal plant. The smell referred to must be that of the gannet population which is actually a tourist attraction for the town. Bird Island lies about 100m off the shore of Lambert's Bay on the Cape's West Coast. It offers visitors a rare opportunity to see the blue-eyed Cape gannet up close. Bird Island is one of only six sites world-wide where Cape gannets breed, and it is the only breeding site easily accessible to the public</p> <hr/> <p>LAQS: The only way to ensure zero industrial air pollution is to have zero industries. This, however, is not feasible and the best way then is to ensure that emissions do not impact negatively on the area. Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>

COMMENT / ISSUES	RESPONSES
<p>25-Feb-19</p> <p>You do not understand the implications for people living here. Mossel Bay will become a ghost town and the waterfront development will be an even bigger mess. Who would want to come and visit Mossel Bay?</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>The harbour is a working harbour and only a portion to the west is envisaged for the so called waterfront development. The location of the current Afro Fishing Cannery and the proposed fishmeal and oil reduction facility is located on the harbour precinct designated for commercial fishing and processing purposes. Thus there is no contradiction in land use for the site.</p>
<p>I had a better opinion of the DA Mossel Bay Municipality and believed that the people running it had a higher IQ but it seems as if the DA is going fall apart. You have just lost mine and so many others' vote for the next elections.</p>	<p>Cape EAPrac: As explained above, the applicant is a private entity and neither the municipality nor taxpayers money is involved in this application.</p> <p>Afro Fishing: Providing AF comply with all laws, regulations and permit conditions, it would be negligent of the local municipality to not consider such an investment in the harbour and the resulting employment opportunities it will provide.</p>
<p>You do not understand the implications for yourselves but there are so many people that are not going to accept this.</p>	<p>Afro Fishing: We are applying for authorisation to proceed with this project in the correct manner. Impact studies and public participation processes are being followed to determine if there are any impacts and to consider the concerns of the community. It will be our responsibility to ensure that we mitigate against any negative impacts and that we consider the concerns of the Mossel Bay community.</p>

COMMENT / ISSUES	RESPONSES
<p>Why don't you place the factory outside of Mossel Bay? Why must we live in the stench? I wonder if you even have Health & Safety officers to do their jobs? This project will turn Mossel Bay into a ghost town. Why must the residents always just accept things.</p>	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The plant at Mossdustria has recently had its Air Emissions License (AEL) revoked for non compliance. Afro Fishing was a client of this facility but currently takes its cannery offal to Atlantis.</p> <p>Afro Fishing: There will be no stench emanating from this installation as described above.</p> <p>Afro Fishing does have safety representatives and a Safety Manager. We also have a NOSA Consultant who visits the factory on a monthly basis. All other occupational health and safety requirements are complied with.</p>

COMMENT / ISSUES	RESPONSES
<p>The Mossel Bay Municipality has enough land outside of the town that could be made available for such a project. The developers are going to erect massive structures which are going to impact on our views and disrupt our traffic. Neither Marsh or Bland streets can handle more traffic which is now going to stick so much that people will have to wear masks. I know the West Coast as I grew up there. And now after 30 years, you come and poison our town.</p>	<p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: Fish meal plants need to be based in an harbour environment as they are supplied raw material by fishing vessels. There will be no massive structures any bigger than any structure already in the harbour. It will not be necessary to wear gas masks as there will be no harmful or noxious odours emitted from this plant. As you know this is not the case on the West Coast where there are 6 fish meal plants. We do not approve of any factory emitting poisons and trust that such a factory will never be granted a license to operate.</p>
<p>I hope you consider all the options, as well as the businesses in town because when businesses close their doors, people lose jobs.</p>	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6, which addresses the impact on local tourism and businesses. If the proposed mitigation measures are implemented, there should be very little (if any) negative impact on local businesses. On the contrary, local businesses could benefit from the increased demand for goods and services, both during construction and operations.</p> <p>Afro Fishing: This is the reason we have abided by correct authorisation processes.</p>

COMMENT / ISSUES		RESPONSES
Gawler, Hannetjie - Private		
	Registered via email	Registered 24 November 2019
Draft Basic Assessment		
-Nov-19	<p>I am against the opening of a Fishmeal plant for the following reasons:- There was a small Fish plant in the Industrial area and due to complaints about smell the owners had to close it down. Why open another plant which will cause the same problem.</p>	<p>Cape EAPrac: The facility in Mossdustrria is in no ways the same as the proposed Afro Fishing plant. The Mossdustrria facility made use of fish and other organic waste to make fishmeal. Afro Fishing is proposing the use of a Re-generative Thermal Oxidiser (RTO) which will burn off all air flow that has potential air pollutants in it, thus destroying the odorous compounds, as such it will not cause the same problem. The Mossdustrria facility was shut down the competent authority as they did not comply with their licensing requirements.</p> <p>Afro Fishing: The Mossdustrria processor was an offal processor who did not comply with his permit conditions. He also processed carcasses that stood in the open in his yard for days. This project will only process fresh fish.</p>
	<p>Petro SA already contributes to polluted air and many Mosselbay people suffers of chest / health problems. The Fishmeal Plant will add to it. Doesn't matter what they say about precautions, as throughout the country Environmental Health is neglected to the expense of PEOPLE'S health. 150 jobs can't be justified when it affects the Environment and Health Safety.</p>	<p>LAQS: Petro SA, and all other existing sources of air pollution, whether they be industrial, traffic, veld fires, waste burning, cigarette smoke, braai/wood fires, etc., will continue to exist, with or without the fishmeal plant. Any complaint about the impact of such emissions must be directed to the appropriate authority, i.e. Mossel Bay Municipality, Garden Route District Municipality, etc. LAQS is of the opinion that the impact of the proposed fish meal factory will be negligible.</p>

COMMENT / ISSUES		RESPONSES
24	<p>ODOUR</p> <p>The terrible odour will hang over Mosselbay and it will affect the Towns Status as a Holiday destination</p> <p>The Harbour is on the doorstep of residences, flats, shops, guesthouses, hotels, Caravan Park etc, it would nearly include and affect those people as if they are employees of the Fishmeal Plant.</p>	<p>LAQS:</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. There are existing sources of odours in and around the harbour. These will continue to exist whether environmental authorisation for the fishmeal plant is given or not. LAQS is of the opinion that the proposed plant will not add any odours to the mix.</p> <p>The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing:</p> <p>This will be a new factory applying 'best proven practises' as noted in the EU and other first world countries. There will be no emissions that will exceed allowed thresholds.</p>
	I am completely against the opening of the Fishmeal plant.	
Gennari, Enrico - Oceans Research		
	Registered via email	Registered 1 March 2019
Germishuys, Marieth - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>		

COMMENT / ISSUES		RESPONSES
25-Mar-19	The possibility that there were irregularities and double standards with the licensing authority, Garden Route District Municipality as well as the local municipality must be investigated.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: The irregularities referred to have been concocted by Mr Coetzee with 'false information'. Afro Fishing will assist any investigation required in this regard.</p>
Giles, Anne - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Public Meeting / Information Session		
	With reference to the public participation meeting we attended I would like to place my objections as follows:	
	There was very little public participation as a result of a speech given that lasted for at least 45 minutes - all of which information regarding the running and erection of the factory should have been explained in the 2 hour run up prior to the public participation supposedly starting at 6pm!	<p>Cape EAPrac: As advertised and provided in the notifications provided to all registered I&APs, there was a public information session that commenced from 16h00 whereby I&APs could speak directly to the various specialists on an informal basis. Copies of the report and various poster presentations were provided to allow people time to walk through and obtain information regarding the proposal and the processes involved. A more formal meeting commenced at 18h00 where the proposal, EIA process and the specialist findings were presented to the attendees. Opportunities were provided for members of the public to ask questions and it was reiterated on numerous occasions that attendees could and should provide written comment and to whom that comment should be sent.</p>
	Although I put my hand up to question information you supplied I was totally ignored. I therefor pose my questions now:	<p>Cape EAPrac: We did indicate that we would try to take as many questions as possible, and if not at the venue, then in writing. All comments and queries are being responded to and included in the reports to be submitted to the competent authority.</p>
	One of the SMART Association representatives posed a question regarding sea life?	<p>Cape EAPrac: That is correct. SMART has also submitted comments in writing.</p>

COMMENT / ISSUES	RESPONSES
<p>My question is also concern regarding the food chain of ALL fish along our shores. The anchovy and red-eye which will be targeted by the fisheries to produce fish meal is almost the very beginning of the food chain of all fish species along our shores! On the map you displayed - Mossel Bay is the only spot along the coast where this species is shown to be thriving according to your research - as Saldanha and the rest of the west coast has been eradicated of all this fish (in other words 'fished out')! I presume our fish supply have regenerated themselves since the I&J fish factory was closed. Now this factory is AGAIN PROPOSED to be opened in the new form of a fish meal factory! I&J I believe closed down because they had fished out any supply of fish which have now over the years of closure had time to regenerate themselves! Your proposal is to do the same again in another form!</p>	<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so.</p> <p>I&J was not fishing for the same species that Afro Fishing requires for the fishmeal and fish oil. There were also other contributing factors to their closure that was not related to availability of fish.</p> <p>Afro Fishing: Afro Fishing will be targeting different species to I&J. As per all local fisheries, anchovy and red eye herring fish stocks are managed sustainably by the department of Fisheries and the scientific working groups. Only a portion of the biomass is allowed to be harvested annually. The phenomenon taking place on the West Coast is not due to overfishing but due to major environmental factors at play. This is resulting in a shift of fish species from the west to east coasts. This migration of pelagic fish stocks is one of the reasons for motivating this project.</p> <p>I&J closed down not because of fishing resource issues but because they were not allowed to diversify and grow their business into aquaculture. If they were allowed to do so, Mossel Bay may today be benefitting from a developed aquaculture industry.</p>

COMMENT / ISSUES	RESPONSES
<p>How will the trawling of ONLY these 2 species of fish be monitored as we all know that other fish will also be caught up simultaneously! This will definitely destroy the only decent area of fish supply in the south western cape which will be disastrous for all local fisherman stretching from as far as Witsand through to Plettenberg Bay?</p>	<p>Afro Fishing: Fishing permit conditions have strict rules regarding bycatch caught. This is strictly controlled by the Department of Fisheries in two ways. Observers are required on board fishing vessels to ensure that the correct species is harvested. If it happens that a landing exceeds the allowed by catch limits then the fishing area is closed for 14 days.</p> <p>Please refer to the Marine Living Resources Act and the various policies in place to ensure sustainable fishing in South African waters.</p>
<p>The quotas for these TONS of fish can rather be given to local fishermen to sustain themselves and the environment as the local fisherman is definitely going to suffer should this factory go ahead!</p>	<p>Afro Fishing: The pelagic species to be caught require large trawlers and cannot be economically harvested if the quotas were allocated to small scale fishermen. Purse seine trawlers and pelagic trawl fishing vessels start at R25m.</p> <p>Of importance though is to note that fishing rights are now been allocated to previously disadvantaged groups and it is precisely these individuals and companies that will benefit from having a plant they can supply in Mossel Bay.</p>
<p>Saldanha is fished out - Namibia and Angola are opposed to the erection of fish meal factories so the next best thing is therefore to come down the coast to Mossel Bay! NO! No! No!!!</p>	<p>Afro Fishing: In recent years new fish meal plants have been erected in Namibia and Angola. Saldanha is not fished out and west coast based fishing companies harvest all along the west coast including Saldanha.</p> <p>There is however a trend occurring where the fish stocks are migrating from west to east coast and one of the reasons why this project is viable.</p>

COMMENT / ISSUES	RESPONSES
<p>Have the handful of prospective employees who are so adamant that this will provide local employment been warned of the health risks associated with working in these factories?</p>	<p>LAQS: While LAQS are not health risk assessors, it did attempt to show that no potential health issues are envisaged as the ground-level concentrations of, e.g. PM10 particulates, SO2 and NO2 were expected to be well below official air quality standards. These standards have been set specifically to protect the environment in general, i.e. humans, fauna and flora. In the case of H2S the Reference Concentration for Chronic Inhalation Exposure (RfC), as published by the USEPA, was used to assess the impact of ground-level concentrations. (No RfC value is published for TMA). The RfC for H2S is 2 µg/m³, a value well in excess of the odour threshold value of H2S used in the air quality impact assessment. The maximum 99-percentile ground-level concentration estimated is 0.6 µg/m³, well below the chronic exposure RfC defined by the USEPA.</p> <p>Afro Fishing: There are thousands of fish meal plants world wide with no inherent health and safety risks. As per every other industry sector, unsafe and harmful working environments will not be tolerated by the authorities. In the late 90's work was commissioned by the CSIR in Hout Bay to determine whether there were any harmful risks associated with the local fish meal plant. School children carried air quality monitors attached to their blazers C547 for a period of time. As per in the rest of the world, the plant received a clean bill of health.</p>
<p>What is foreseen as the lifespan of this factory?</p>	<p>Afro Fishing: This is an interesting question. The project feasibility will be based on the 15 years of the TNPA lease term. It could materialise that TNPA require all the harbour leased sites in 15 years time to facilitate the massive gas project envisaged following the recent Total gas find. Afro Fishing will only pursue this project if it is viable over the 15 year lease term so for now 15 years is the project lifespan.</p>

COMMENT / ISSUES	RESPONSES
<p>Have the prospective employees had someone explain to them in laymen's terms the possibility of more jobs being lost than created if the environmental impact is so bad that tourism is affected due to air and sea pollution - which is why the world is opposed to these factories being erected not only Mossel Bay residents!</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: The numerous impact studies have indicated that the impact of the project will not impact the tourist sector so the question is irrelevant. The opposite is however valid in that the Mossel Bay community living on the other side of Spar need to understand what the long term strategy is of the MB municipality to ensure job creation and the growth of MB. They can then decide for themselves whether a tourism only environment is going to provide the necessary job creation.</p> <p>From my own experiences in Hout Bay, when the big companies like I&J, Sea Harvest and Oceana shut down their operations, crime, poaching and unemployment increased dramatically. Tourism certainly did not absorb the numbers and Hout Bay remains a socio economic case study of note.</p>

COMMENT / ISSUES	RESPONSES
<p>I am a VERY CONCERNED property owner / member of the general public - with our property being in the direct zone of odours should air pollution occur! This could also result in health risks for all public in Mossel Bay!</p>	<p>Afro Fishing: Please read the reports indicating that a RTO system will be installed hence there will be no offensive odours from the new factory.</p> <p>LAQS: There is no "zone of odours" indicated in the air quality impact assessment, although an area of "higher" concentrations is indicated. The maximum concentrations over all of that area are well below the odour threshold limit value. As a result, the Air Quality Impact Assessment indicates that no discernible odours would be detectable if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. There are existing sources of odours in and around the harbour. These will continue to exist whether environmental authorisation for the fishmeal plant is given or not. LAQS is of the opinion that the proposed plant will not add any odours to the mix. The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
<p>Industrial businesses have in recent years been shut down in Bland Street and surrounds although they operated in this area for many years! Now the Harbour is targeted for rezoning for the purposes of this factory as I presume that is why Town Planners are part of the team motivating this project?</p>	<p>Cape EAPrac: The Port of Mossel Bay is a working harbour and is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain one of their core functions.</p> <p>DELplan: The Port of Mossel Bay is zoned as Transport Zone I: Transport Use. Column 3 of the table set out in Schedule 1 stipulates that TZI has a secondary right, namely Industry. Thus, the property will not be rezoned but a consent use application will be launched only for a portion of the harbour to extend the existing rights.</p>

COMMENT / ISSUES	RESPONSES
<p>No - we object strongly to the erection of such a factory and will be the first at the Municipality to complain and demand a shut down should ANY form of pollution (air or sea) be evident!</p>	<p>Cape EAPrac: The licensing conditions associated with such a development will be very strict and the licensing authority has the right to retract the license if the applicant does not comply. In addition, Air Emissions Licenses have to be renewed every five years and submit monitoring data on a regular basis. Thus should the project go ahead, any "promises" (commitments) made by the applicant will be legally binding and cannot be ignored.</p>
<p>The world is trying to conserve the environment not destroy it and a move of this kind would be nothing short of destruction of our beautiful ocean and its sea inhabitants!</p>	<p>Afro Fishing: Fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There will hence be no overfishing in the bay due to the installation of a new factory.</p> <p>This is precisely why there are environmental laws and policies driving world economies. This project will not destroy the environment in any way. Please read the detail of the various reports and the impact studies for detail in this regard.</p>
<p>Who /where/what is the market for which this fish meal product is intended? The inhabitants of Mossel Bay will definitely not benefit.</p>	<p>Afro Fishing: The fish meal market is aquaculture and agriculture feed producers. The fish oil market will be the pharmaceutical companies who produce fish oil health products for human consumption. The markets are mainly offshore so this project will generate foreign currency for the country.</p> <p>As per SARS currency repatriation laws, all the earnings will be returned to Afro Fishing and applied to pay salaries and wages, other input costs, etc. Afro Fishing will also have to invest in enterprise development, social development, skills development and supplier development projects to meet its Level 1 B-BEEE targets. All of these projects are currently Garden Route District based. Any profits will then be distributed as follows: Investor dividends, re-investment, repayment of debt, etc.</p>

COMMENT / ISSUES		RESPONSES
	The world is moving away from fish meal and exploring alternative sources for a similar product - PLEASE PRESERVE OUR FISH for future generations - there are alternative ways of creating employment which would be far more Harbour friendly - always bearing in mind conservancy and not ignoring facts which can lead to eradication!	Afro Fishing: South African fish stocks are managed sustainably as noted in the many other comments above. Your objection ignores numerous legislative ACTS and state functionaries in this regard and the many management programmes in place to ensure that overfishing does not occur.
Giles, Rachel - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Giles, Daniel Earl - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Giliomee, Thys - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Gilmour, John - Princess Brands		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Goulding, Andrew - Private		
	Registered via email	Registered 20 March 2019
Background Information Document		
20-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Green, Allen - Neighbouring Property Owner		
	Registered via email	Registered 20 March 2019
Background Information Document		
	I wish to advise that my property is situated directly opposite the old I@J factory.	

COMMENT / ISSUES		RESPONSES
07-Aug-19	As I am familiar with the smells which is released from this type of activity as is in the case of similar factories situated in the Saldanha Bay area on the West Coast	<p>Cape EAPrac: The proposed facility will be completely unlike any of the existing fishmeal facilities. There will be no open air offloading or storage of fish, this will happen by means of closed pipes and sumps. The cooking and processing areas will be enclosed, with well designed ducting and building pressure to ensure that the air is circulated to the RTO to burn off molecules that cause nuisance odours. The processes and technology is detailed in the BAR.</p> <p>Afro Fishing: Afro Fishing (AF) intends to install a modern facility using new technology in the form of a Regenerative Thermal Oxidiser (RTO). The odour abatement plan is detailed in the application and the intention is to install a factory that complies with all emission thresholds.</p>
	I wish to object at this early stage to this type of activity in our area until I am convinced otherwise.	<p>Cape EAPrac: Thank you for your participation, your objection is noted.</p>
Greyvenstein, Gloria - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Grundlingh, Chelsea - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Hamilton, Rina - Private		
	Registered via email	Registered 27 February 2019
	Please do not expand the fisheries in Mossel bay harbour due to the following : Smell...impact on tourism....not drawing locals for work causing influx of aliens causing other problems for e.g. crime..housing..services.....and many more!!	<p>Cape EAPrac: The proposal has gone through extensive specialist investigations to determine the levels of impact. Please review the Basic Assessment Report that addresses your concerns.</p>
Higgs, Laetitia - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Higgs, Errol - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Hill, Harry - Private		

COMMENT / ISSUES		RESPONSES
Registered via email		Registered 25 March 2019
Draft Basic Assessment		
Thank you for the opportunity for further comment in the above regard. I would like to comment as follows:		
1. AIR IMPACT REPORT The final Air Impact Report (No AF 0002/19) cannot be viewed as an objective, unbiased or uncompromised report because of the following:		
		<p>Afro Fishing</p> <p>1.1 The air quality consultant attended the visit so that he could acquaint himself with the technology and not that he be 'influenced'.</p> <p>The name of the factories visited have been referred to in numerous documents.</p> <p>Yes, you are correct the purpose of the visit was to expose the air quality consultant and the appointed environmental consultant to fish meal processing and odour abatement technology.</p> <p>I cannot comment on your insinuation that the professionalism and integrity of one of South Africa's leading consultants in this field has been compromised. If Afro Fishing wanted to influence a consultant we certainly would not have appointed Mr Albertyn. Mr Albertyn came highly recommended with exceptional qualifications.</p>

COMMENT / ISSUES	RESPONSES
<p>1.1 As reported in the Mossel Bay Advertiser of 7 June 2019, the practitioner concerned (Mr Albertyn) visited fishmeal plants in Portugal and Spain as a guest of the applicant, thereby exposing himself to possible undue influencing by the applicant's Chief Executive Officer who lead the so-called "Fact Finding" excursion to Portugal and Spain.</p> <p>Apart from referring to an unnamed factory in Portugal, it is of particular concern that he did not declare his overseas trip to Portugal and Spain, presumably paid for by Afro Fishing and / or the manufacturers / operators of the RTO (Dürr AG or Haarslev Industries A/S).</p> <p>The visit was ostensibly to expose him to RTO technology, similar to what is planned for the proposed new facilities at the Afro Fishing plant at Mossel Bay. However, there cannot be any reason why he could not research the technology concerned on his own. It is also surprising that as a qualified engineer he did not mention RTO technology as technology used elsewhere when he did his initial Air Quality Impact Assessment for the project (Final Report No REP 0002 / November 2018). The technology concerned has allegedly been available for approximately 15 years. Furthermore, a visit of a day to each of the two plants (Annexure K8: Fact Finding Feedback Report), was insufficient to make any proper assessment of any value of emissions or odours from the plant or to properly consult the communities affected by the plant.</p>	<p>LAQS:</p> <p>LAQS hopes that Mr Hill is not suggesting that Mr Albertyn was bribed by Afro Fishing and/or technology providers to produce a report in Afro Fishing's favour because such an accusation is libellous. If Mr Hill has proof that such an arrangement existed he should lodge a complaint against Mr Albertyn with the Engineer Council of South Africa, the Engineering Council of the United Kingdom and the Institute for Professional Environmental Practice in the USA. Their contact details are easily obtainable from the internet, a source of information that Mr Hill seems to hold in high regard. These bodies will investigate Mr Hill's claims and, if found guilty, reprimand Mr Albertyn or, if they deem any offence serious enough, scrap his registrations. However, should they find Mr Albertyn innocent, what will Mr Hill be prepared to forfeit in return? But then, as a retired person who was employed by a polluting industry (and defended it while employed as communication official), Mr Hill stands nothing to lose by making such loose allegations, does he? To whom should Mr Albertyn have declared his visit to two fishmeal factories in Europe?</p> <hr/> <p>Mr Albertyn made no secret of his visit to Spain and Portugal. He even had aerial photographs of the two sites available at the public meeting and showed these to all who were interested. Mr Hill, obviously, was not. Of course Afro Fishing paid for the visit to Spain and Portugal, but only for the direct expenses, e.g. visa costs, transport, accommodation, etc. LAQS did not levy any fees for Mr Albertyn's time spent during the visit. Does Mr Hill seriously expect Mr Albertyn to travel overseas at his own costs to investigate something without a means of recovering the costs? Mr Albertyn is, of course, more than willing to return the both factories and spend an extended period of time at each to, as Mr Hill puts it, "make any proper assessment of any value of emissions or odours from the plant". LAQS will, of course, expect Mr Hill to carry the costs and will gladly provide him with a quotation for the costs involved. With all due respect, if Mr Albertyn only researched the technology on-line, which, incidentally, he did, and did not visit such a plant to verify issues identified during the internet search, Mr Hill would have accused him of not doing due diligence by confirming matters directly through a site visit. (Mr Albertyn does not necessarily believe everything he reads on the internet!)</p>

COMMENT / ISSUES	RESPONSES
	<p>Finally, Mr Albertyn was one member of a team of people that visited the two sites. One of the team was a former editor of the Mossel Bay Advertiser and her role within the team was specifically to look at the application of RTO technology critically as a member of the public (not as a technical person) and gather opinions from members of the communities affected by the factories, specifically the one in Peniche, Portugal, which is surrounded by the town. It is believe that details the findings of the visit (and Mr Albertyn's presence) was reported in that newspaper. Why pick on Mr Albertyn? Before throwing an accusation at Albertyn, Mr Hill should get his facts straight first. Had Mr Hill asked the question, either during the public meeting or during the open session preceding it, he would have been informed that the work done in 2018 was of an exploratory or scoping nature to see if it was, indeed, possible for a fishmeal plant to operate from the Mossel Bay harbour precinct and what the emissions should be to prevent any detectable odours in the surrounding area. It was NOT to discuss RTO technology, but a general approach to determine, inter alia, emission requirements.</p>

COMMENT / ISSUES	RESPONSES
<p>1.2 It was particularly noticeable that he found it necessary to state on the opening slide of the presentation at the Public Meeting held in the Mossel Bay Town Hall on 20 November 2019 as part of the EIA public participation that he was unbiased. On the contrary, Mr Albertyn's conduct at the abovementioned meeting was reprehensible and smacked of bias towards the fishmeal factory project. In his presentation he failed, for example, to mention that black smoke would be emitted during boiler start-up operations. He only admitted to this following a question from the audience. He also failed to mention in his presentation that there WILL be emissions of H2S, SO2 and amines from the RTO stack. Only when I told him that that was contrary to what was stated in his report did he admit to it and said it would be in minute quantities only, undetectable by most people.</p>	<p>LAQS: Mr Albertyn stands by his claim of impartiality. If he was not, he would not have refused to carry out the final air quality impact assessment without measured TMA and H2S emission data from the two factories that he visited. He would rather have made use of emission factors with all their associated uncertainties. Having received measured emissions data, Mr Albertyn would not have used the highest concentration to calculate annual emissions, but the lowest so that emissions input data to the dispersion model are a minimum. He would not have used the lowest odour detection values he could find on the internet for comparison of results, but the highest value to bias the expected impact on air quality towards minimum impact. He would not have based his dispersion model on worst-case conditions, but on ideal conditions to make any potential impact seem less than expected. He would not have identified (during the apparently unnecessary site visits) and listed essential steps that Afro Fishing must meet for the operation of the fishmeal factory to be successful. All of these steps were discussed at the public meeting. Mr Hill is either being obtuse or he is displaying his total lack of knowledge about the process of dispersion modelling. How does he expect ANY air quality impact assessment in the form of ground-level concentrations of various pollutants as the result of dispersion modelling if there are no emissions? It is clear that Mr Hill suffered from selective hearing at the time of the public meeting because Mr Albertyn mentioned that emissions were measured and that these emissions were used as input data for the dispersion model. Mr Hill seems to have missed that part of Mr Albertyn's presentation</p>

COMMENT / ISSUES	RESPONSES
	<p>Afro Fishing: 1.2 Your biased account of events is noted. Secondly, the issue of 'black smoke' on start-up of the existing cannery boiler did not form part of the scope of the authorisation process. This was however queried by one of the attendees and explained to be normal and not harmful by Mr Albertyn.</p> <p>Please re-read the air quality impact study as it does not state that emissions of H2S, SO2 and amines will be zero. Baseline studies in the harbour have been done and there are currently recordings of a presence of H2S, SO2 and amines in the air without the installation of the new facility and on days when the existing cannery was not operational. What we are saying is that odours from the new plant will be treated so that emission levels of H2S, SO2 and amines are below detection levels, in other words they will not be "smelt".</p>
<p>1.3 It is my view as well those of several other members of the public who attended the meeting that Mr Albertyn displayed extreme bias towards the project. He was also disrespectful towards members of the audience throughout, even to the extent of getting into a battle of words with one property owner whose property will drop substantially in value if the project goes ahead. This was a question which should have been dealt with by the Afro Fishing CEO. His conduct was contrary to at least paragraph 4 of the Code of Ethical Conduct and Practice of the Environmental Assessment Practitioners of South Africa (EAPASA), which states that Environmental Assessment Practitioners shall not conduct professional activities in a manner involvingbias and paragraph 4, which states that an EAP must conduct her/his work at the highest possible standard reasonable to expect from a professional in that position. It is also contrary to the spirit of the National Environmental Management Act, 1998, which inter alia aims to promote quality assurance regarding environmental assessment practice (Section 6(1)(a) and to promote the best interest of the environment, sustainable and the public good (Section 6(1)(b).</p>	<p>LAQS: Mr Hill's comments are disingenuous as it is attempting to creating a false impression without providing any shred of contradictory scientific and/or technical evidence whatsoever. It is very strange, indeed, that Mr Hill is the only one of "several other members of the public" to accuse Mr Albertyn in the manner that Mr Hill sees fit to do. No one else has accused Mr Albertyn of being implicated in potential bribery and bias so clearly expressed by Mr Hill. Mr Albertyn cannot recall a "battle of words", other than informing one person that he would gladly buy a property in the so-often-referred-to affected area if he could afford to do so. The only "battle of words" that Mr Albertyn was involved in was with Mr Hill himself who would not allow Mr Albertyn to answer his questions, but kept on interrupting with argumentative comments.</p> <p>Afro Fishing: 1.3 Your opinion of the consultants behaviour is noted. It was my view that Mr Albertyn, being a leader and expert in his field, does present his analysis with confidence. If you were intimidated by this, I apologise as this was not the intention.</p>

COMMENT / ISSUES	RESPONSES
<p>1.5 (sic) It is therefore my view that the Air Impact Report is so compromised, so biased and the practitioner showed so much bias in his personal conduct at the public meeting on 20 November 2019 that the assessment lacks credibility. It should be rejected and a new report by an independent, impartial practitioner be commissioned).</p>	<p>Afro Fishing: 1.5 Mr Albertyn has also produced the local AQMP (Air Quality Management Plan) for the Eden District so why he would be biased towards a company applying for an Atmospheric Emission License is beyond me. Your opinion is noted.</p> <p>LAQS: Mr Hill, on the other hand, was very aggressive and accusative in ALL of the questions and statements made by him during the public meeting. He showed extreme bias against the proposed factory and was not objective at all. Why should Mr Hill's bias be excused, but Mr Albertyn's honest opinion be discredited? Surely Mr Albertyn is entitled to his own opinion. It is, after all, based on personal observation, data gathering and scientific interpretations, unlike Mr Hill's personal opinions. It is clear that Mr Hill does not realise that if Mr Albertyn's air quality impact assessment was negative, no progress in the planned project would have been possible. However, in view of a positive outcome, Mr Albertyn is being accused of bias because he stands by his findings. It is of particular interest that Mr Hill saw fit to attack Mr Albertyn personally, but had nothing to say about the proposed factory, the proposed technology or its potential impact on the environment. This is an old technique: in the face of no real facts, discredit the consultant so that the whole project is discredited. Mr Hill is, of course, more than welcome to appoint his own consultant to carry out an air quality impact assessment. He should carry the costs of that consultant to visit a fishmeal factory that uses RTO technology. If that consultant is professional, and not biased because Mr Hill pays his/her costs, he/she will be objective. If it turns out that such findings differ from LAQS's assessment he will then have a valid reason to challenge LAQS's findings.</p>
	<p>MPBS: Given the depletion of fishing resources, it is imperative that businesses operating in this sector adapt to ensure that they remain profitable and stave off possible job losses. The proposed redevelopment is an attempt from Afro-Fishing to not only remain relevant and sustainable by diversifying their activities, but to enhance their capacity to meet the growing demand in specialised sectors. In addition, the neglected I&J site will be upgraded and thus improve the sense of place for those visiting the harbour area.</p>

COMMENT / ISSUES	RESPONSES
<p>2. SOCIO-ECONOMIC IMPACT ASSESSMENT</p> <p>The sense of place factor is underestimated in the assessment in relation to Mossel Bay's heritage as well as traditional character as a holiday resort which attracts thousands of tourists annually. Because of Mossel Bay's unique sense of place, there has also been huge investment in residential properties. Tourism has been the mainstay of the local economy and job creation when fish factories closed or operated well below their capacity (Afro Fishing for example) because of depleted fish resources off the Mossel Bay coast.</p>	<p>Afro Fishing:</p> <p>Fish resources have not been depleted off the Mossel Bay coast. There is research showing the presence of fish. There are numerous fishing companies within the harbour precinct that survive on local landings of various fish species. With regards pelagic species, there is 35 years of hydro-acoustic data that has been collected by the scientists. From this data you will realise that fish migrate around the South African shores and that there are cycles of high and low fish availability depending on many environmental factors.</p> <p>There are also many other activities in the harbour including the oil and gas industry activity. Please re-read the Socio and Economic Impact Study where the impacts relating to this project are detailed.</p> <p>Garden Route Growth and Development strategy documents portray Mossel Bay as "a thriving tourism, trade, port, industrial and service centre anchoring the western portion of the Garden Route. Its industrial focus and capability can better absorb 'heavy' industrial activities than other urban centres in the region. A Special Economic Zone is proposed for the area, to focus primarily on green energy technologies, but also secondarily on agri-exports, aviation, bunker fuel, rig-repairs and trans-shipment. Some of the services at the SEZ could develop value-added products and services related to the oil, gas and related industries, as well as waste reduction, recycling and agri-processing". Tourism is thus not the mainstay of the economy as per your comment.</p>
	<p>MPBS:</p> <p>Afro-Fishing has been operating for a number of years and the expansion of its operations will guarantee an additional 248 jobs in addition to the existing number of employees, which will compensate to some extent for the jobs lost when the I&J plant closed.</p>

COMMENT / ISSUES	RESPONSES
<p>There is considerable doubt whether Mossel Bay will benefit from the Brulpadda offshore gas discoveries of which the commercial viability has not yet been confirmed. The more likely scenario is that the loss-making synthetic fuels plant at Mossel Bay will shut its doors in 2020, resulting in hundreds of job losses. Mossel Bay cannot risk the loss of jobs in the tourism industry.</p>	<p>Afro Fishing: There appears to be a view from a certain demographic sector that Mossel Bay will only survive if the town focusses on tourism. This view however contradicts the real socio and economic needs of this country and Mossel Bay. I experienced the same views in Hout Bay many years ago. Hout Bay is a good example of how crime, poaching , riots and unemployment increased considerably when the big companies disinvested. I&J, Sea Harvest, Oceana and many smaller companies disinvested from Hout Bay which had a massive impact on property prices and other socio-economic factors. Until today no other labour intensive industries have located themselves in Hout Bay and replaced the big companies that disinvested. Many Hout Bay harbour buildings are now battened closed and in a dilapidated state similar to the I&J buildings in Mossel Bay that have been redundant for at least 8 years. This is not economic development.</p> <p>I do also ask where all the tourists are going to come from in Mossel Bay? Hout Bay is on a main tourist bus route for visitors to Cape Town and surroundings. The route is CT-Hout Bay-Cape Point-Kirstenbosch-CT. Then there are many other tourist attractions and routes (Waterfront, Robben island, wine farms, Table Mountain, etc.) There is even an international airport feeding the numbers. Yes we all want the tourist numbers to increase in Mossel Bay but MB is no Cape Town or Hout Bay and probably only has a high tourism count for weeks of the year. It is during these 4 weeks that the factory will be shutdown. If a survey was done as to what the perception was of Mossel Bay, then I am confident 'industrial town' will have the highest percentage of votes.</p>

c-19

	COMMENT / ISSUES	RESPONSES
10-De		<p>To question the benefits of the Brulpadda offshore gas discovery and that PetroSA plant will shutdown is also extremely short sighted. The Total gas find has the potential of replacing Eskom and solving this countries biggest problem. There is so much gas available that the plan is highly likely to be as follows: Do the necessary conversion to PetroSA and feed a % of this gas to the MB refinery and resurrect it, a major % to be liquified and exported, another % to be used to generate power, the remaining to be supplied to households for gas stoves, etc. Mr Hill, the Brulpadda find is probably going to put Mossel Bay on the international map and save this country.</p> <p>Yes, tourism is important, but will only be one facet of this multi-faceted Garden Route District economy. However if MB must only rely on tourism, then the same problems that arose in Hout Bay will occur to Mossel Bay.</p>
		<p>MPBS:</p> <p>Employment in the tourism industry is often seasonal, sensitive to economic fluctuations (i.e. spending power) and the availability of accommodation. In contrast, employment created by the proposed Afro-Fishing development will be permanent, i.e. sustainable employment that will guarantee income for employees and extended families as long as the business remains sustainable into the future.</p>

COMMENT / ISSUES	RESPONSES
<p>The assessment does not deal adequately with perceptions around the sense of place and its potential negative impact on the tourism industry. Although employment figures in the tourism industry are not available it is a safe assumption that it is more than what will be created permanently by the fishmeal factory</p>	<p>Afro Fishing: In Garden Route planning documents, Mossel Bay is the thriving tourism, trade, port, industrial and service centre anchoring the western portion of the Garden Route. Its industrial focus and capability can better absorb 'heavy' industrial activities than other urban centres in the region. A Special Economic Zone is proposed for the area, to focus primarily on green energy technologies, but also secondarily on agri-exports, aviation, bunker fuel, rig-repairs and trans-shipment. Some of the services at the SEZ could develop value-added products and services related to the oil, gas and related industries, as well as waste reduction, recycling and agri-processing.</p> <p>The intent of this project is anyhow not to impact the sense of space. It is for this reason that 'best practises' will be applied and a RTO plant installed. There will be no impact on tourism as is the case in the many other coastal towns in SA and which also house industrial activity.</p>
<p>Not all critical role players were interviewed, for example the Mossel Bay City Improvement District which represents all property owners in a demarcated area adjacent to the Mossel Bay harbour.</p>	<p>MPBS: Its is not possible to interview all participants. The list of I&AP was consulted for potential stakeholders and groups that could offer a perspective on the socio-economic aspects of the proposal. Mossel Bay City Improvement District was not registered as an I&AP.</p> <p>Afro Fishing: All role players were invited to become Interested and Affected Parties.</p>

COMMENT / ISSUES	RESPONSES
<p>It is stated in the assessment that “the significantly larger Afro Fishing facility will be visible to a large number of receptors” and then states that it “may negatively affect the current small coastal harbour character of Mossel Bay, one of the key selling features that attract tourists.”</p> <p>Calling it the “current small coastal harbour character of Mossel Bay,” indicates a lack of understanding or ignorance of what Mossel Bay’s actual sense of place is to its residents and the hundreds of thousands of tourists visiting Mossel Bay annually. The “harbour character” of Mossel Bay is, with a respect, a very small factor in Mossel Bay’s sense of place. It extends much wider and is influenced much more by its many heritage features, beaches, cleanliness, including virtually unpolluted air, and mild climate.</p>	<p>MPBS: Reference to the "small harbour character" refers to the nature of the harbour area earmarked for the development, i.e. it is not a large commercial harbour.</p> <p>Afro Fishing: The view regarding 'sense of place' of Mr Hall is noted. I am however sure that it is not the view of Portnet or the Municipality to have derelict and redundant buildings as part of their 'sense of space' planning. Afro Fishing has agreed with Heritage to include some stone walls in their building design. Also important is that the footprint will be very similar to that of the redundant i&J site and buildings and zoning height restrictions will be abided by. Please see the drawings included in the BAR application.</p> <p>The intent of this project is anyhow not to impact the sense of space. It is for this reason that 'best practises' will be applied and a RTO plant installed. There will be no impact on tourism as is the case in the many other coastal towns in SA and which also house industrial activity.</p>
<p>It is conceded in several places in the overall Draft Basic Assessment Report that the plant will emit odours during operations. On p 13 of the COMMENT AND RESPONSES REPORT Afro Fishing responds as follows to a question by an IAP: “A zero odour scenario can never be guaranteed. We can however ensure that the technology and disciplines applied are best practises and the odour emitted in compliance with allowed thresholds etc.” On p 14, the consultant states that “the only way to ensure zero industrial air pollution is to have zero industries.”</p> <p>On p 80 in the 2019 Air Quality Impact Assessment it is concluded that the potential risk from malodours is in the “very low” category (a score of 24). It nevertheless does not exclude the risk of malodours.</p> <p>It is significant that in the report the sense of place impact of the fish meal plant is scored at 75 (medium-high negativity) before mitigation and 55 (medium negativity) if mitigation takes place. Mossel Bay’s economy, however, cannot afford any negative impact on its sense of place by the plant, however small it is.</p>	<p>MPBS: This is a statement and no response is required.</p> <p>Afro Fishing: A zero odour scenario is not the situation currently based on the baseline air monitoring done and the recently drafted Air Quality Management Plan for the Eden District. This can only be achieved if there were no cars on the road, all braais stopped, all industry stopped, etc.</p>

COMMENT / ISSUES	RESPONSES
<p>This aspect is also a cause for concern due to Mr Deon van Zyl's dismissive comments about sense of place at the Public Meeting on 20 November 2019 after he at first tried to evade the question on what Afro Fishing intended doing to address the negative perceptions to reduce the impact on the tourism economy of Mossel Bay, and then indicating that it was overrated. He used the Hout Bay plant as a comparison. His commitment to protecting Mossel Bay's real sense of place is therefore doubtful.</p>	<p>MPBS: This is a statement and no response is required.</p> <p>Afro Fishing: See the numerous responses above. I can assure you that as a property owner in Mossel Bay I will not be supporting or managing a project that will have a negative impact on the Mossel Bay 'sense of place'. I am confident that this project will not do harm to the 'sense of place' and tourism. There will obviously be conditions set by the authorities to ensure that the necessary checks and balances are in place.</p>
<p>On p 56 of the Socio-Economic Impact Assessment it is stated that "Mr Van Zyl strongly believes that people's perceptions will change if they realise that the proposed project has the luxury of installing from the outset a modern factory and odour abatement measures that are currently being applied in the EU and other first world countries."</p> <p>Mr Van Zyl therefore recognises that there are negative perceptions at present. However, he clearly does not understand how perceptions are created and what it takes to change them. In the case of fishmeal plants, the existing general perception, supported by the experience at several fishmeal factories elsewhere along the South African coast, is that they emit malodours.</p>	<p>MPBS: This is a statement and no response is required.</p> <p>Afro Fishing: We do understand that perceptions play a major role. In this case we have the legacy of the past and what has transpired on the west coast with old factories, the nuisance caused by the offal processor in Mossdustria and the twisted and 'fake news' articles posted. It is our intention to work on these perceptions and inform the public of the facts and the technology to be used in the new year.</p>

COMMENT / ISSUES	RESPONSES
<p>As a former diplomat and later a career communications executive over a period of 40 years, first at a multi-national automobile manufacturer, then a leading mining house and later the Moss gas project before I became the strategic support executive at the Mossel Bay municipality, I have enough experience in the management of perceptions to know that the current negative perceptions of the Mossel Bay fishmeal factory will not be changed overnight by the fact that it will be a modern factory employing modern odour abate measures “currently being applied in the EU and other first world countries.”</p> <p>It may take years for the negative perceptions to be changed to positive perceptions by simply operating a modern factory, by which time the existing negative perceptions may seriously harm the “sense of place” of Mossel Bay and consequently its reputation as a desired destination for thousands of international and national tourists, as well as its reputation as one of South Africa’s most popular resort towns. However, to protect the sense of place, the only mitigation that is recommended in the report during the fishmeal factory’s operational phase is to enclose most of the infrastructure to retain the current “look and feel” of the current Afro Fishing buildings.</p>	<p>MPBS: This is a statement and no response is required.</p> <p>Afro Fishing: Your comments are noted. This has certainly not been the case in the many other coastal towns throughout the world. Mossel Bay has a mixed economy and the sense of place should FIT with what is current. This project does not intend to alter the current sense of place and in fact tries to contribute to the sense of place by contributing to the local economy, etc.</p>

COMMENT / ISSUES	RESPONSES
<p>On p 105 of the Socio-Economic Impact Assessment it is recommended that “Communication Protocols that address directly and indirectly affected residents and surrounding land owners, with specific reference to activities, timelines and intended impacts related to the construction phase and all related activities associated with the implementation of the project (i.e. during the operational phase) be implemented.”</p> <p>While it is stated on p 7 of the Socio-Economic Impact Assessment, in relation to local tourism and businesses, that it is imperative that the sense of place that attracts tourists is not negatively affected, and on p 85 that nuisance factors and a disturbed sense of place can negatively impact the local tourism industry and businesses operating in the area, the Assessment does not specifically mention preserving the existing sense of place or communicational protocols addressing audiences beyond affected residents and surrounding landowners during the construction and implementation phases.</p>	<p>MPBS:</p> <p>The proposal for a communication protocol that is tied into a monitoring and evaluation mechanism. The practical detail and mechanism for implementation would form part of the implementation plan. It provides a framework that needs to be expended into a monitoring and evaluation plan that would be prepared in consultation with stakeholders.</p>
<p>It is critical that the potential impact of the plant and the perceptions around it during its operational phase are mitigated on an ongoing basis and that approval for the plant be made subject to the compulsory implementation of appropriate Communication Protocols for a predetermined period of at least five years to preserve the present positive sense of place of the old town of Mossel Bay.</p>	<p>MPBS:</p> <p>This is a statement and no response is required. The same principle applies as described in the previous comment.</p> <p>Afro Fishing:</p> <p>Communication with the community will be improved as noted above. There is already an agreement that I feed the Deputy Mayor with more information. Afro Fishing also commits to working with a forum of sorts should this be required.</p>

COMMENT / ISSUES	RESPONSES
<p>3. DRAFT BASIC ASSESSMENT REPORTS</p> <p>The Draft Basic Assessment contains no information on the Afro Fishing's board members, which is strange considering the size of the investment as well as the controversial nature of the project. They (Johannes Augustinus Breed and Shamera Daniels) are listed on the CIPC website, which any member of the public registered with the CIPC can access.</p> <p>By withholding this information from registered Interested and Affected Parties, they are prevented from commenting on or be assured of their fitness and properness to direct Afro Fishing in relation to Section 49 of the National Environment Management: Air Quality Act, No 39 of 2004, which states that in order to determine whether a person is a fit and proper person for the purposes of an application in terms of this Chapter, a licensing authority must take into account all relevant facts, including whether-</p> <p>(a) that person has contravened or failed to comply with this Act, the Atmospheric Pollution Prevention Act or any other legislation applicable to air quality;</p> <p>(b) that person has held a provisional atmospheric emission licence, an atmospheric emission licence or other authority that has been suspended or revoked;</p> <p>(c) that person has been a director or senior manager who is or was a director or manager of a company or firm to whom paragraph (a) or (b) applies; and</p> <p>(d) the management of the listed activity which is the subject of the application will or will not be in the hands of a technically competent person.</p>	<p>Cape EAPrac:</p> <p>A NEMA application is made in the name of the entity, along with the person responsible for the application, in this case the CEO who will be directly responsible for implementing and managing any aspect of the facility on a day to day basis (i.e. who is the fit and proper person).</p> <p>The names of the directors were provided to any I&APs who requested such information and your statement that it was deliberately withheld is incorrect.</p>

COMMENT / ISSUES	RESPONSES
<p>While it may be argued that the licence will be issued to the CEO, the fact remains that he is appointed by, and accountable to the directors.</p> <p>In the interest of transparency Mr Breed's position as well as the connection, if any, of the Angola-based African Selection Trust (AST) with Afro Fishing needs to be clarified. According to reports in the Namibian media, Mr Breed is the managing director of AST which holds a 60% interest in Seaflower Pelagic Processing (SPP) in Namibia. According to the media he is also a director of SPP. The Namibian State-owned company Fishcor owns 40% of SPP. SPP is the beneficiary of a highly controversial fish quota awarded to it by the former Namibian minister of fisheries, who is on trial at present for corruption related to the awarding of fish quotas.</p>	<p>Afro Fishing:</p> <p>The "fish rot" scandal in Namibia is totally unrelated to this project and investment. Just because a local activist incorrectly links Afro Fishing to this scandal does not mean it is true.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>
<p>4. PUBLIC PARTICIPATION MEETING</p> <p>The public participation meeting in the Mossel Bay Town Hall at 18:00 on 20 November 2019 was a farce. It was manipulated to frustrate meaningful and proper public participation and to be no more than a minimum-compliance exercise to meet statutory requirements.</p>	<p>Cape EAPrac:</p> <p>Public participation is not a once off event, it is the process where the public can review and comment on documentation and reports that form part of the EIA process. The initial public participation commenced in February 2019 with the introduction of the proposal and has been ongoing since.</p> <p>The public meeting / information session was advertised and all registered I&APs were notified that the session would comment from 16h00 where I&APs could review the available information and speak directly to the specialists. A formal meeting was then held from 18h00 with presentations explaining the proposal, the EIA process and the specialist findings.</p>

COMMENT / ISSUES	RESPONSES
<p>The facilitator, Mr Colin Puren, conducted the meeting in such a way that questions could be limited to a minimum, and stretched the meeting out to far beyond its advertised closing time to frustrate attendees. He did this by allowing long exceptional technical and self-aggrandisement presentations by the Afro Fishing CEO and the air impact consultant. Self-styled community leaders were allowed to make political speeches without asking any relevant questions to ensure that as few as possible questions could be asked from the floor.</p> <p>The involvement of a senior municipal official as facilitator as well as the absence of Afro Fishing’s directors from the meeting is also indicative of the lack of transparency of the basic assessment process.</p>	<p>Cape EAPrac: It is unfortunate that you feel that the opinions of the people who feel that they will benefit is seen as political speeches.</p>
Background Information Document	
<p>We reside at 5 Rudie Barnard Street, Mossel Bay, which is approximately 1,1 km from the proposed fish meal facility in an upmarket area above Santos Beach and are therefore strongly opposed to the construction of such a facility. Because of the proximity of our property to the proposed facility, it is likely to be exposed to the offensive odours from the plant as identified distinctly in the specialist Air Quality Impact Assessment odours (“It is generally accepted that odours will always be generated during fishmeal production processes”). The market value of our property is therefore likely to be affected negatively.</p>	<p>LAQS: Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Cape EAPrac: The proposed facility will be completely unlike any of the existing fishmeal facilities. There will be no open air offloading or storage of fish, this will happen by means of closed pipes and sumps. The cooking and processing areas will be enclosed, with well designed ducting and building pressure to ensure that the air is circulated to the RTO to burn off molecules that cause nuisance odours. The processes and technology is detailed in the BAR.</p> <p>Afro Fishing: Afro Fishing (AF) intends to install a modern facility using new technology in the form of a Regenerative Thermal Oxidiser (RTO). The odour abatement plan is detailed in the application and the intention is to install a factory that complies with all emission thresholds.</p>

	COMMENT / ISSUES	RESPONSES
25-Mar-19	<p>The mitigating measures as identified by the specialist do not provide any guarantees that our property, and indeed the prime tourist attractions of Mossel Bay, such as the Bartolomeu Dias museum complex, the historic Post Tree (a national heritage site), the Santos Blue Flag beach, the Goods Shed and the Point area will not be exposed to the anticipated offensive odours and thus not be affected adversely by the odours. The identified mitigating measures are based on human interventions, which require reliable human behaviour at all times. This we know cannot be guaranteed in a society where labour unrest and associated sabotage and/or vandalism have become distinct probabilities. The poor water quality in the harbour as caused by the existing wet fish processing facilities is already an example of the fishing industry's careless approach to the environment.</p>	<p>LAQS: No offensive odours are envisaged anywhere.</p> <p>Afro Fishing: The existing cannery has operated for 13 years with the same threats. In fact, all businesses operating in the South African environment have to plan for the threats noted. AF will continue to manage these risks and will put measures in place to reduce impacts on the community and environment.</p> <p>AF has recently embarked on acquiring ISO22000 certification. This accreditation process does require that risks of this nature be managed.</p> <p>AF is a also proud level 1 B-BEEE contributor. As part of our commitment to transformation, and the growth of our economy, we will continue to support initiatives that will empower the poor, upskill those who need it most, and protect our environment to ensure that we contribute to a prosperous Mossel Bay.</p>
	<p>Mossel Bay is first and foremost one of South Africa's most historic towns and a popular tourist destination. Tourism is one of the mainstays of the local economy and as ratepayers of Mossel Bay, we are also concerned about the placing of a plant, which may be detrimental to the local tourism economy, amidst the top tourism facilities of the town. The latter includes several restaurants, hotels and other accommodation facilities.</p>	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact.</p> <p>Afro Fishing: The new factory will not have any impact on the current heritage of the town. The Heritage Society has made some recommendations regarding the use of stone walls etc. These will be included in the architectural design.</p>

COMMENT / ISSUES		RESPONSES
	In conclusion, it will quite frankly be reckless to allow or to proceed with the establishment of such a plant in the harbour area. As opposed to the existing wet fish processing facilities, the proposed fish meal and oil reduction facilities will almost guarantee unacceptable and inescapable environmental pollution in the form of offensive odours which outweigh all other benefits that the plant may have.	<p>LAQS:</p> <p>It must be borne in mind that the current fish canning plant operated by Afro Fishing produces products destined for human consumption. As a result, various control measures are in place to ensure proper hygiene and health standards, including control over the quality of the fish currently being delivered to Afro Fishing. The fish oil that will be produced in the proposed fishmeal plant is also destined for human consumption, with the result that Afro Fishing will extend that current fresh fish quality control procedures to the fish delivered to the fishmeal plant, the main parameter being the temperature at which the fish is delivered to site. The RTO technology planned for the plant is the best available in the world and has been proven to prevent odorous emissions.</p> <p>Afro Fishing:</p> <p>Modern fish meal plants do not pollute and emit foul odours as explained above. We are installing a modern facility with modern odour abatement methods. If we were to pollute the factory will be closed down by the authorities and our licenses revoked.</p>
Hoepfner, Gerhard - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		
25-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Hoffe, Jeanette - Private		
	Registered via email	Registered 23 November 2019
Draft Basic Assessment		
	Please register my objection to having a Fish Meal Factory in our Mossel Bay Harbour.	<p>Cape EAPrac:</p> <p>Thank you for your participation in this EIA process. You have been registered as an I&AP.</p>

COMMENT / ISSUES		RESPONSES
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">23-Nov-19</p> <p>There are no SURE GUARENTEES that this will not affect our Town and main business area for locals and visitors.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The impact rating has been confirmed to be Very Low and is unlikely to be detected outside of the building. There is no comparison between Afro Fishing's planned operations and the other fishmeal plant that is referred to. The main differences are: Firstly, the technology used by the other plant was old and very little provision was made for the prevention and/or reduction of odorous emissions. Secondly, the fish product processed by the other plant was never fresh as some of the waste originated somewhere distant and was transported to site by road. Thirdly, the other plant did not only process fish waste, but also various other waste products from, e.g., abattoirs.</p> <p>AfroFishing: A zero odour scenario can never be guaranteed. Currently, amines, CO, SO2, H2S, NO2, PM's and other emissions are already in the atmosphere within the harbour and surroundings as determined by baseline air monitoring performed in 2019. We can however ensure that the technology and disciplines applied best practises and the odour emitted in compliance with allowed thresholds etc.</p> <p>Of importance, this plant will process fresh fish with low histamine and TVBN levels. This is not an offal processing facility like the one that closed down in Mossdustria. That factory processing carcasses and raw material that stood in its yard for several days.</p>	
<p>We cannot take a chance that this will not spoil our Town. It is a popular swimming area + also dining out.</p>	<p>Cape EAPrac: Your concern is noted, however all the specialists indicate that the impact of the plant will have a Very Low to Low Medium impact.</p>	

COMMENT / ISSUES		RESPONSES
	I live here and feel they can do this elsewhere suitable not in a town!	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows:- In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product.- When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p>
Holm, Allan - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Holm, Helet - Private		
	Registered via email	Registered 26 March 2019
Public meeting / Information Session		
	I hereby state my reasons for being totally against the project to develop in the Mossel Bay harbour to produce fish meal by Afro Fishing;	
	I did attend the meeting on 20 November 2019 in the Town hall of Mossel Bay. It really comes across as we as residents of this town are being steamrolled by this company and that there has been a lot of developing already taken place in order to get this project going.	<p>Cape EAPrac: There has been a significant amount of investigation into the proposal in order to provide as much information as possible to the competent authorities and all stakeholders. The company is fully aware that all investigative studies as part of an EIA are undertaken at risk.</p>

COMMENT / ISSUES	RESPONSES
<p>I am a property owner in the lower CBD of Mossel Bay. It has been confirmed at the meeting that the area of the town where my properties are situated will be mostly affected by the project. There are no guarantees that the project will not leave the town with an unpleasant smell; it is an absolutely huge concern for as home owners, residents and for businesses. The rental market in the CBD will also be affected, no one would want to stay in the central of Mossel Bay, even in close proximity of the harbour, anyone will be affected if there is wind at the time.</p>	<p>LAQS: It is so that an area of higher concentrations is indicated. The maximum concentrations over all of that area are well below the odour threshold limit value. There are existing sources of odours in and around the harbour. These will continue to exist whether environmental authorisation for the fishmeal plant is given or not. LAQS is of the opinion that the proposed plant will not add any odours to the mix. The air quality impact assessment shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours originating from the proposed plant.</p> <p>Afro Fishing: The BA application, Air Quality Impact Study and the public participation meeting all indicated that offensive odours will be contained.</p>
<p>I want to know how can this fact be so ignored, we all have full proof and confirmation this is a concern to most Mossel Bay residents, yet this company insists to continue and disrespect the concern. If the project is up and running, and everything is going well for a while and there is no smell for instance, but later, down the line, some extractor breaks and causes a problem (as we all have already stated), what will this company do to rectify the situation? Do you have 24 hours or less to fix it or the factory gets shut down? Where do we as owners, business people and residents stand with this, what are our rights? And what guarantees do we have.</p>	<p>Afro Fishing: Please note that Afro Fishing has not ignored this fact. This is why this factory includes 'best proven' practises and technologies. This is why several impact studies were commissioned.</p>

COMMENT / ISSUES		RESPONSES
12-Dec-19	<p>I also have concerns why Melissa McKay has been sent to an all expenses paid holiday trip overseas, what is in this for her? I'm asking straightforward, is there bribery, something that she is expected to do with these concerns (maybe loose the data). I smell a rat. Things seem corrupt and this is another concern of many residents that is trying to have a say here.</p>	<p>Cape EAPrac: The trip to Spain and Portugal was not a holiday trip, but a work trip to investigate the efficacy of the RTO at fishmeal plants. A report was provided as part of the Basic Assessment Report. If there had been an existing similar facility in South Africa, then a site visit would have been done to view that, unfortunately there are no similar plants in the Southern African region.</p> <p>Each specialist and the environmental consultant are appointed by the applicant to facilitate the legal process. We are remunerated for all work done as part of the EIA process and as provided for in the NEMA EIA Regulations. Each of us sign legal declarations of independence and to this end we made sure the that the details of the site visits were documented and included in all public reports.</p>

COMMENT / ISSUES	RESPONSES
<p>My husband conversed the day of the meeting with the person behind the project, he raised he's concerns, he suggested the project being moved out of town, not in a residential area and he was told off by this person "It's not going to happen" Another concerns I have is, why is this company so sure of this that they can continue? We as owners and residents do have a say and our voices need to be heard and taken into consideration.</p>	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: The nature of this operation is such that fresh raw material is supplied by fishing trawlers. These trawlers need to offload in fishing harbours and preferably directly to the processing factory to eliminate aging and damage to the fish. Fish meal plants also require sea water for cooling purposes which is not available inland. The idea is for Afro Fishing to diversify its current pilchard canning operation into anchovy and red-eye reduction as well. If this is not possible, then the project will not be viable due to the increased overheads. The cost and logistics involved to road transport the landed fish to other processing locations is also not viable.</p>
<p>Lastly, when it comes to job creation; it's a positive. The more jobs are created in the blue collar sector, the more public transport, more noise (you can hear it clearly in Bland street) will impact the town. The infrastructure of the town with trucks and taxis will also another concern.</p>	<p>MPBS: This is a statement and no response is required.</p> <p>Afro Fishing: With all economic growth comes activity and progress. The Traffic Impact Assessment has shown that the impact from traffic will be Low.</p>

COMMENT / ISSUES		RESPONSES
	There were politics on the day of the meeting in the Town hall, I found it absolutely unnecessary the mention of people above Spar centre and the people below Spar centre. How this project want to create jobs for the less fortunate, take this same project, create your jobs for people out of town!!! There is an industrial area for such projects that do affect the odour of a residential are and the quality of living for its residents.	<p>Cape EAPrac: It is unfortunate that you feel that the opinions of the people who feel that they will benefit is seen as political speeches.</p> <p>See comment above regarding locating the facility out of town in the industrial area.</p>
	I strongly and completely state my absolute NO for the continue of this project in the Mossel Bay harbour.	<p>Cape EAPrac: Thank you for your participation in the EIA process.</p>
Background Information Document		
26-Mar-19	Please note that I am the sister mentioned in the email from my brother, Gys Smalberger.	<p>Cape EAPrac: Thank you for your registration and participation.</p>
	I fully support the reasons stated in his email yesterday.	<p>Cape EAPrac: So noted. Please see the responses provided to his comments below.</p>
	Could you kindly give me feedback too on plans for developing this factory in Mossel Bay harbour	<p>Cape EAPrac: Email with the BID and initial specialist air quality report was provided to Ms Holm on the 26th March 2019.</p>
Huber, Mike - Montagu Hof Body Corporate		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
		<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES	RESPONSES
Air and water pollution.	<p>Cape EAPrac: The facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p>
Heavy road traffic on limited access road.	<p>Urban Engineering Kindly refer to the Traffic Impact Study for all trip generation details.</p>
No parking for 20ton trucks.	<p>Urban Engineering There is more than sufficient truck parking available on site for the required trips.</p>
Noise pollution - trucks and harbour noise.	<p>Afro Fishing: The noise level of the new fish meal plant will be less than that of the current cannery operation. The building will also be a sealed unit preventing the even lower level of noise to dissipate.</p> <p>The factory will be located in the designated fishing area of the port where industrial activities are approved.</p>

COMMENT / ISSUES		RESPONSES
11-Dec-19	Site is in the centre of town! Not an industrial site!	<p>Cape EAPrac: That is not the case. The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>DELplan: The area surrounding the proposed development is characterized by medium- to high-density residential developments, industrial properties, tourism facilities and businesses. It can be argued that the harbour area was initially developed for transport purposes (with ancillary uses), but over time residential developments developed around the subject property due to the unique location. Therefore, it can be argued, that the harbour was developed before the residential developments.</p> <p>Furthermore, the dominant use of the property will remain as Transport Zone I and the fish industry will be a supplementary to the primary use right allowed.</p> <p>Lastly, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>
	Property owner within 1km of site. Devaluation of property value. Representation of 12 property owners.	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

COMMENT / ISSUES		RESPONSES
	Site should be in industrial area not in a residential area or central business district (CBD) or Morocco where fish are.	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows:</p> <ul style="list-style-type: none"> - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater. <p>Afro Fishing: The nature of this operation is such that fresh raw material is supplied by fishing trawlers. These trawlers need to offload in fishing harbours and preferably directly to the processing factory to eliminate aging and damage to the fish. Fish meal plants also require sea water for cooling purposes which is not available inland. The idea is for Afro Fishing to diversify its current pilchard canning operation into anchovy and red-eye reduction as well. If this is not possible, then the project will not be viable due to the increased overheads. The cost and logistics involved to road transport the landed fish to other processing locations is also not viable.</p>
Jacobs, Barry - Gourikwa Huis Khoisan		
	Registered via email	Registered 28 February 2019
Draft Basic Assessment		
12-Nov-19	We as the Gourikwa Khoisan stamhuis support Afro Fishing Fishmeal. A condition we would like to be is to included Black Empowerment and Khoisan house as partners.	Afro Fishing: Suitable partners will be explored once the authorities have made a decision and the project is shown to be viable. Afro Fishing is a Level 1 B-BEEE company.
	Thank you for the job opportunities.	
Jacobs, Ena - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Public Meeting / Information Session		

COMMENT / ISSUES	RESPONSES
Thank you for hosting the meeting regarding the proposed Fish Meal and Oil reduction Plant. Several complaints were voiced and discussed:	
1. Will there be : Sufficient Training of operators of plant ? ? Follow up training, Guaranteed Maintenance of plant and assurance not to deplete the marine resources.	<p>Afro Fishing: As per the current cannery operation suitably qualified operators will be trained and remunerated to operate this plant.</p>
2. Impact study of traffic in the CBD Insufficient? No impact in town or on route was covered.	<p>Urban Engineering The traffic Impact Study was prepared according to the relevant guidelines.</p>
3. Proposed Waterfront development can be jeopardised ?	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

	COMMENT / ISSUES	RESPONSES
23-Nov-19		<p>DELplan: This argument can be regarded as invalid and inaccurate since the TNPA, the IDP and SDF of Mossel Bay Municipality. The IDP stipulates that Mossel Bay Municipality supports the harbour development project to its fullest. A CBD and harbour development precinct plan have been adopted in 2013. The Transnet National Ports Authority has approved the proposed harbour developed and is currently soliciting input from all stakeholders through the process of expressions of interest.</p> <p>Furthermore, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>
	4. Polluting the sea and beaches. Tides in the harbour area not sufficient to care waste away??	<p>Cape EAPrac: The facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p>

COMMENT / ISSUES	RESPONSES
<p>5. What IF there is a bad odour ? What is plan B? Move plant ?? Close down plant? Or shelve problem and make excuses?</p>	<p>Cape EAPrac: The licensing conditions associated with such a development will be very strict and the licensing authority has the right to retract the license if the applicant does not comply. In addition, Air Emissions Licenses have to be renewed every five years and submit monitoring data on a regular basis. Thus should the project go ahead, any "promises" (commitments) made by the applicant will be legally binding and cannot be ignored.</p> <p>Afro Fishing: Under normal operation there will not be offensive odours emitted by this plant. Should this occur, the plant will be shutdown until the problem is resolved.</p>
<p>6. What back up, guarantees and assurance do we have that the impact of this plant is not going to contaminate our beaches and air ??</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The whole process will be controlled by an intelligent computer that will give early warning if any measurement is out of specification so that corrective action can be taken. Annual maintenance will also be required and it will be Afro Fishing's responsibility to ensure that all alarms are reacted to and all maintenance is done as per schedule provide by the technology providers.</p> <p>Afro Fishing: The current operation and the many other industries in Mossel Bay have never impacted the beaches or air. A business of this nature can only function if everything is in working order and in compliance with relevant legislation.</p>
<p>This town is a jewel in the Garden Route and mayor potential to grow as a tourist Mecca. A very lucrative proposition for Mossel Bay.</p> <p>Please do not spoil this!</p>	<p>Afro Fishing: Afro Fishing acknowledges that Mossel Bay has tourism potential and understands that tourism is one of the legs of the Mossel Bay economy. The aim of this project is to contribute to the Mossel Bay economy and not to destroy it.</p>
Jacobs, H - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Jagger, Ria - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019

COMMENT / ISSUES		RESPONSES
Jansen van Vuuren, Rikus - Aida Mossel Bay		
	Registered by Celia Beaumont	Registered 28 February 2019
Jens, Khiselwa - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Jew, Khuselwa - Afro Fishing employee		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Kapp, Bennie - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
	Concerned about the possible pollution effects the industry can have on the environment, sea, local people and guests.	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p>

COMMENT / ISSUES		RESPONSES
25-Mar-19		<p>LAQS:</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
	Over fishing in our bay.	<p>Cape EAPrac:</p> <p>Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing:</p> <p>Certain species of pelagic fish are not suitable for human consumption for several reasons. For example, anchovy is small and oily and not conducive to filleting and processing for human consumption. This type of fish is in abundance in SA waters and therefore harvested for reduction into fish meal and fish oil. Fish meal is sold into the animal feed industry and fish oil mainly used for human consumption.</p> <p>The fish is caught at night because they mainly feed and shoal at night.</p>
Kapp, Elize - Private		
Registered by Marelize Kapp		Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES		RESPONSES
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>		
25-Mar-19	<p>The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p>
	<p>Concerned about double standards in the municipality.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p>
Kapp, Marelize - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>		

COMMENT / ISSUES	RESPONSES
<p>The pollution of the sea due to stick water by Afro Fishing causing possible pollution in the sea around the harbour.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: No stikwater will be released to the sea.</p>

COMMENT / ISSUES		RESPONSES
25-Mar-19	Concerned about pollution effects on the environment, the sea life and the townspeople.	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
Kellerman, Christo - Private		
	Registered via email	Registered 28 February 2019

COMMENT / ISSUES	RESPONSES
Kleinhans, Steve - DEA&DP	
Automatically registered as I&AP	Registered 22 February 2019
Draft Basic Assessment	
1. The draft Basic Assessment Report (DBAR) dated 8 November 2019, received by this Department on 11 November 2019 refers.	
2. This Directorate has reviewed the information contained within the Draft Basic Assessment Report (DBAR) and provides the following comment:	Cape EAPrac: Thank you for taking the time to review the DBAR.
<p>2.1 Integration of the EIA and AEL application processes: Please be reminded that, besides managing the public participation process, the EAP must consult with every organ of state that administers a law relating to a matter affecting the environment relevant to this application for an environmental authorisation.</p> <p>To ensure that the relevant provisions of the National Environmental Management Act 1998 (NEMA): the Environmental Impact Assessment Regulations and the National Environmental Management: Air Quality Act, 2004 (a specific environmental management Act) have been complied with, it is advised that the EAP must consult with the Garden Route District Municipality regarding the air emissions license (AEL) and to synchronise the relevant assessments and specialist studies, information and reports. Such documents, reports, information and responses to any written input to such reports and plans, must be incorporated in the Basic Assessment Report.</p>	Cape EAPrac: So noted. The synchronisation process with the NEM:AQA requirements has been undertaken. Please see the comments submitted by the Garden Route District Municipality confirming compliance with the NEM:AQA requirements.
Kindly note that all registered interested and affected parties (including organs of state and the competent authority) are entitled to comment, in writing, on all reports or plans submitted during the public participation process. Any public participation process must be conducted for a period of at least 30 days.	Cape EAPrac: A Pre Application public participation, as well as a formal public participation which included a 30 day comment period on the Draft Basic Assessment Report was undertaken for this EIA process.

COMMENT / ISSUES	RESPONSES
<p>2.2 Alternatives:</p> <p>It is noted that no other technology alternatives have been included in the DBAR since the Re-Generative Thermal Oxidation (RTO) is considered to be the Best Available Technology (BAT) in managing fishmeal odours, including Trimethylamine (TMA). It is understood that the RTO operates by burning ducted air in the processing facility at temperatures of up to 850°C which should effectively destroy the TMA, Hydrogen Sulphide (H₂S) and other compounds associated with the processing of the fishmeal.</p>	<p>Cape EAPrac:</p> <p>That is correct. The implementation of the RTO system will ensure that no discernable odour will be found outside of the building. The implementation of the RTO is a non-negotiable requirement for this application. Please also see the comments from Dr Johann Schoeman of the Garden Route District Municipality.</p>
<p>According to the specialist Air Impact Report, compiled by Lethabo Air Quality Specialists (Pty) Ltd (LAQS), the odorous emissions are estimated to be substantially lower than the odour detection threshold of 800 ng/m³ and 700 ng/m³ for TMA and H₂S respectively if the RTO system is implemented. Furthermore, it is understood that the estimates for the other emissions does not exceed the official air quality standards set for PM₁₀ particulates, Sulphur Dioxide (SO₂), Nitrogen Dioxide (NO₂) and Carbon Monoxide (CO).</p> <p>Furthermore it is understood that a seawater scrubber will be used for the treatment of cooling air. The seawater scrubber will remove particulate matter during the fishmeal cooling cycle to prevent fugitive emissions.</p>	<p>Cape EAPrac:</p> <p>That is correct.</p> <p>LAQS:</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES	RESPONSES
<p>According to the documentation the seawater scrubber will operate in parallel to the RTO; therefore, the emissions from the scrubber will not be directed through the RTO. However the documentation does not contain information on what concentrations of especially TMA and H2S will be in the seawater discharge.</p>	<p>LAQS: The process can be divided into two distinct sections, i.e. a "wet" section and a "dry" section. The wet section consists of all the process steps from unloading of the fish up and including the fishmeal drier. All the wet process units included will be sealed units with extraction air being drawn off and treated in the RTO unit. The dry section consists of all the process steps after the fishmeal has been dried, i.e. cooler, grinding, packaging and storage. The dried fishmeal will be treated with an anti-oxidant to stabilise the fish meal and stop any oxidation from occurring. Cooling air, as well as building air from the grinding, packaging and storage areas will be passed through a sea water scrubber system to collect particulate matter that is entrained in the building air. Air from these dry process operations do not emit amines or H2S as the product is now stable.</p> <p>In the unlikely event that this arrangement proves to be inadequate, a two stage scrubbing plant can be considered. The first stage will be a sea water unit followed by a second stage chemical scrubber.</p> <p>TMA and H2S emission occur during the "wet" processing steps and not during the "dry" processing steps. Therefore, there should not be any, or at most extremely low levels of TMA and H2S in the seawater returned to the ocean.</p> <p>Afro Fishing: The offensive odours are not released during drying. The drying process actually stabilises the product and is the reason why fish meal can be stored safely for years once dried.</p> <p>AF will install indirect steam driers. These are dryers with rotary discs heated by live steam and through the process of conduction the discs heat the wet meal and evaporate off the excess water. Hot water vapour is removed from the dryer and used as the heat source in the liquids evaporation plant. All the water vapour is condensed either in the evaporators or in the sea water condenser following evaporation. So essentially air is not the transport medium to remove the water vapour from the dryers. Vacuum and blowers are the driving force. Yes, some air will be in the system and this is why the remaining air emitted from the drying process will be incinerated in the RTO unit.</p>

COMMENT / ISSUES	RESPONSES
<p>It is also understood that no location (property) alternatives for the activity were considered. It is noted that the motivation for not considering such alternative location is because the application is for the expansion of the existing Afro Fishing facility on Quay 1 to include the immediately adjacent old I&J premises o Quay 2 of the Port of Mossel Bay. The existing facility is defunct but is already equipped with the necessary infrastructure for water and sewage. It is located in an area designated by the TNPA for commercial fishing industries, it has direct harbour proximity for offloading of fish directly into the factory and the site location limits impacts on the town with respect to traffic and transport of raw fish off site. It is also stated in the DBAR that the Applicant is not in possession of, nor has any lease for any other properties that offer an alternative site option for such a factory and it is stated that it is not economically nor practically feasible or reasonable to propose an alternative site. The latter two statements are however not clearly substantiated.</p>	<p>Cape EAPrac: Afro Fishing has no intention nor financial incentive to buy and or lease property in the Mossel Bay area outside of the harbour for a fishmeal facility which will lead to negative environmental impacts.</p> <p>Afro Fishing: It would not be economically viable to situate the fish meal say in Mossdustrria as the transport costs will increase the input cost dramatically. A 1000t landing will require 50 trucks per day to get the fish from the harbour to the alternative site. The traffic impact will be HIGH and the environmental factors surrounding this exercise extreme. The quantities of fresh water required for cooling would incur very high water tariffs and the cooling towers needed to cool and recycle this water will add to the capital expenditure. The added fixed costs to manage another site will obviously add to the operating costs. It is for this reason that being in the harbour is the best option: sea water can be used to cool, there is no transport cost and a single site incurs one set of fixed costs (overheads). The only other harbour alternative is to consider Coega. Coega however is not central to the fishing resource as Mossel Bay is as per the Department of Fisheries surveys. The existing cannery will also have to be relocated which is not ideal due to the added relocation cost and the cannery lease in the port of Mossel Bay still has tenure.</p>

COMMENT / ISSUES	RESPONSES
<p>2.3 Effluent Discharge:</p> <p>According to the current Coastal Waters Discharge Permit (Ref: 2014/013/WC/Afro Fishing (Pty) Ltd), dated 11 September 2017), Afro Fishing is permitted to discharge 56 cubic meters of effluent per day at Pipeline A (Off-loading effluent) and 78 cubic meters of effluent from Pipeline B (process effluent). From the documentation it is understood that only the volume of discharge will increase, but not the potential constituents. It is unclear how it will be ensured that the potential constituents will not increase as the amount of fish that will be processed in the plant will increase. This must be clarified in the BAR.</p>	<p>Cape EAPrac:</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility.</p> <p>Afro Fishing:</p> <p>The added discharge will be for water used for condensation. There are no pollutants in this water and it does not come into contact with any fish or processed fish. This is the volume that is increased.</p> <p>There is no processing waste from a fish meal plant as the idea is to process everything in order to achieve the best yield possible.</p> <p>There may be some sludge from the fish oil tanks. This will be drummed and sold to local farmers for animal feed.</p> <p>The intention however is to improve the existing cannery discharge water quality as part of the expansion project. A DAFF unit and settling tanks will be installed. All protein collected here will then be included in the fishmeal processing. This is now possible as the skimmed solids can be put through the fish meal plant</p>

COMMENT / ISSUES	RESPONSES
<p>2.4 Operation and Maintenance of the RTO: The efficiency of the RTO is directly related to the maintenance of the RTO . It is therefore imperative that regular maintenance of the RTO is undertaken. In this regard an operation and maintenance manual must be compiled by the supplier of the RTO technology. This operation and maintenance manual must be included in the Operational Management Plan for the processing plant.</p> <p>Since there is no other such plant available in South Africa, it is reasonable to expect that knowledgeable technicians are not readily available in the event of system failure / breakdown. It must therefore be ensured that adequate training is provided to the plant / process manager and plant personnel responsible for the operational and maintenance of the plant.</p>	<p>Cape EAPrac: Please note that there are currently two suppliers of RTO technology being considered by the Applicant. In the event that the plant is authorised, the final purchasing will commence. Once this is decided, the operation and maintenance manual can be obtained and included in the Operational EMPr.</p> <p>Afro Fishing: I do think that the skills required and maintenance of the RTO has been overstated. The equipment is way simpler than a boiler and in South Africa boiler operators are plentiful. Nonetheless, specific training will be drafted for the RTO and critical spares will be kept in stock. The PLC is standard and can be maintained by an instrumentation technician.</p> <p>The expansion into a fish meal plant and the requirement for additional boiler capacity will trigger the 3000kW General Machinery Regulations 1998 and Afro Fishing will have to appoint a competent mechanical or electrical engineer. I am a chemical engineer so I will not be able to fulfil this duty.</p> <p>I foresee therefore the appointment of an electrical engineer for the site who will also be the certified engineer, a production manager for the fish meal plant who will be either mechanically or electrically trained, a fish meal plant supervisor with technical and maintenance skills and a plant operator with processing and fault finding skills. The plant operator will need minimum matric plus experience operating machinery which is PLC controlled. There will also be alarming installed. As this will be a critical part of the process, I would imagine that alarms will be directed to myself or the site engineer via mobile phone and email.</p> <p>LAQS: LAQS agrees with Afro-Fishing's comments. While RTO is state-of-the-art technology, it is not complex to operate and monitoring a few key parameters and routine preventative maintenance will ensure reliable operation.</p>

COMMENT / ISSUES	RESPONSES
<p>2.5 Process Control: According to the documentation the fishmeal process will be controlled by a Programmable Logic Controller (PLC) which will monitor key parameters associated with the RTO operation. It is understood that the interlock setting will raise alarm when one of the parameters reaches a value that requires attention.</p> <p>In light of the above, it must be ensured that all sensors and analysers are regularly inspected and maintained to prevent incorrect readings and to ensure that RTO runs efficiently.</p>	<p>Cape EAPrac: So noted and agreed. The maintenance manual and procedures will include PLC sensors and analysers maintenance.</p> <p>LAQS: Should any sensor fail it will produce a signal that is not within specification, i.e. either no signal at all, a "zero" signal or a "full-scale" signal. The PLC system will immediately detect this malfunction and sound an alarm for attention, failing which the system will shut down automatically.</p>
<p>2.6 Odour: Cognisance must be taken of the fact that tourism is one of the main drivers of the Mossel Bay economy. Odour could have a negative impact on tourism, especially tourist activities (e.g. festivals) in and around the harbour and nearby beaches. Therefore, it must be ensured that odorous emissions do not exceed the odour detection thresholds as stipulated in the Air Impact Report by LAQS.</p>	<p>Cape EAPrac: The implementation of the RTO will ensure that odorous emissions remain below the odour detection thresholds. Furthermore, the facility will not operate from mid December to mid January annually as this period is closed for fishing quotas as per DAFF regulations.</p>
<p>2.7: Specialist Reports: All specialist reports, submitted as part of the Basic Assessment Report, must contain all the information outlined in Appendix 6 of GN No. R982 of 4 December 2014,</p> <p>In addition to the above, the following is more notable:</p>	

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	COMMENT / ISSUES	RESPONSES
10-De	<p>Air Impact Report by LAQS: According to the Air Impact Report, for the purposes of dispersion modelling an assumption was made that the plant will run continuously at full capacity, 24 hours per day for a period of 330 consecutive days per year, specifically for emissions to occur continuously, including in weather conditions result in poor dispersion of pollutants such as low wind speeds, cool stable air, etc.</p> <p>According to the results of the dispersion modelling, the concentrations of PM10, SO2, NO2 and CO will not exceed the ambient air quality standards; and the concentration of TMA and H2S will not exceed the odour detection thresholds.</p>	<p>LAQS: Correct. Please bear in mind the following: - LAQS used the highest measured TMA emission concentration to calculate annual emissions. - LAQS compared the outcome of TMA dispersion modelling to the lowest TMA odour detection level that it could find in literature. For example, the reported odour detection levels of TMA varied from 0.8 to 2.6 µg/m3 and LAQS used the value of 0.8 µg/m3 in its evaluation of dispersion modelling results. These steps were taken to evaluate, in LAQS's opinion, worst-case conditions.</p> <p>Afro Fishing: Please bear in mind that LAQS has catered for the worst case scenario of operating every day. A plant like this will operate about 120 days of the year of which probably only 30 days will be full production days. This is the nature of fishing. The plant will also be shutdown during peak holiday periods (i.e. Dec/Jan and the Easter long weekend.)</p>

COMMENT / ISSUES	RESPONSES
<p>Furthermore, the Air Impact Report has made recommendations to minimise the formation of odorous emissions. It is not clear from this report or the DBAR how the implementation of these recommendations will be guaranteed and definitely be incorporated in the development and / or operation of the facility. In this regard, the specialist has failed to provide a reasonable opinion as to whether the proposed activity should be authorised, and any conditions that should be made in respect of that authorisation. It is unclear if the recommendations which have been submitted are based on any aspects which were conditional to the findings of the assessment by the specialist and which must be included as condition of authorisation.</p>	<p>LAQS:</p> <p>In its opinion, LAQS is not in a position to give an opinion whether any activity should be authorised or not. It sees its function as showing what the air quality impact of an activity will be. In the case of Afro Fishing LAQS chose to work on worst-case conditions, i.e. full production capacity for 24 hours per day and 33 days per year; using the lowest odour detection limits obtained from industry, etc.</p> <p>In its recommendations LAQS lists actions that should be incorporated if the emissions from the process are to be low enough to prevent detectable odours from the process. LAQS sees it as the relevant authorities' function to decide if these recommendations should be mandatory or not. LAQS did not investigate the effect should one or more of these conditions be excluded as LAQS is of the opinion that the steps recommended are essential if the process is to operate in an environmentally acceptable manner.</p> <p>However, should DEA&DP insist on an opinion whether the activity should be authorised or not, LAQS is of the opinion that authorisation should be given, provided that LAQS's recommendations are specified as conditions of authorisation.</p> <p>Afro Fishing:</p> <p>See a list odour control measures included in the Final BAR and the EMPr. <i>(Please note that these control measures have been provided throughout the reports and are merely being collated here for ease of reference).</i></p> <p>This list includes preventative measures that reduce the build-up of amines, etc. The fact however remains that the RTO will remove any amines so a build-up of amines will be tolerated. However a combination of the correct disciplines and practises plus the RTO unit will reduce the risk of odour impacts.</p>

COMMENT / ISSUES	RESPONSES
<p>Socio Economic Impact Assessment by Multipurpose Business Solutions: The findings of the Socio-Economic Assessment have been noted. However, the assessment recommends that a Monitoring and Evaluation Plant (M&EP) is compiled which identifies key measurement indicators and sets out the procedures for tracking, monitoring, calculating and verifying the impacts associated with the project. This, along with the other recommendations have been included in the Environmental Management Programme. The practicality and feasibility of the M&EP is questionable and the inclusion thereof in the Environmental Management Programme (EMP) must be explained or reconsidered.</p>	<p>MPBS: Given the nature and scope of the activity, experience of issues related to odours associated with the proposed activity and the comments of I&APs, a monitoring and evaluation plan should be introduced. A time frame could be attached if acceptable levels of odour are measured and it is confirmed that the suppression equipment is operating successfully. Afro Fishing have not indicated any apprehension to the introduction of a monitoring and evaluation mechanism. In our view a M&EP is practical and feasibility and fit for purpose in the current circumstances.</p>
<p>2.8 Recommendations of the EAP and Specialists: The recommendations from the specialist report(s) have not been accurately recorded in the DBAR. Please be reminded that any aspects which were conditional to the findings of the assessment either by the EAP or specialist, must be recorded in the BAR and it must clearly state which are to be included as conditions of authorisation. Further to this, the propose impact management outcomes for inclusion as conditions of authorisation are lacking. Please be advised that such proposed impact management outcomes must be clearly described and where applicable included in the EMPr.</p>	<p>Cape EAPrac: All the recommendations made by the specialists have been captured in the DBAR. They may not necessarily be conditional to the findings, but they are crucial in ensuring that the best practicable option and management strategies are put in place.</p>
<p>2.9 Environmental Management Programme: The contents of the EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of GN No. R982 of 4 December 2014. The EMPr must address the potential environmental impacts of the activity throughout the project cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). In light of the AEL application, the EMPr must clearly distinguish between the non-operational and operational aspects of the activity.</p>	<p>Cape EAPrac: This office has provided all the information required for the EMPr, as well as ensuring that the document will be able to be adequately implemented and later audited without jeopardising the intent of an EMPr. The monitoring section has been rearranged to provide the department with better clarity.</p>
<p>Furthermore, the EMPr must include the following:</p>	

COMMENT / ISSUES	RESPONSES
<p>Operational and Maintenance Manual</p> <p>An Operational and Maintenance Manual must be compiled by the equipment supplier and included in the EMPr. the Manual must also contain a training schedule for the plant / process manager as well as key plant / process personnel. the training schedule must include regular refresher courses.</p>	<p>Cape EAPrac: Please note that there are currently two suppliers of RTO technology being considered by the Applicant. In the event that the plant is authorised, the final purchasing will commence. Once this is decided, the operation and maintenance manual can be obtained and included in the Operational EMPr. This manual will obviously be customised for the Afro Fishing setup.</p>
<p>Breakdown Procedure</p> <p>The Air Impact Report identifies three main potential breakdown that can occur in an RTO (pg. 43). The EMPr must include a breakdown procedure for all possible potential breakdowns, including a procedure for the rectification of any plant processes, which lead to the exceedance of the thresholds of the identified emissions.</p>	<p>Cape EAPrac: Please note that there are currently two suppliers of RTO technology being considered by the Applicant. In the event that the plant is authorised, the final purchasing will commence. Once this is decided, the operation and maintenance manual (including breakdown procedure) can be obtained and included in the Operational EMPr.</p> <p>LAQS: It is customary for industrial processes the be accompanied by standard operating procedures (SOPs) and these invariably include breakdown management protocols. LAQS assumes that the same will apply in Afro Fishing's case as the inspected installations of both considered suppliers included such procedures.</p> <p>Afro Fishing: The EMPr will include this information. These plants are not prone to faults or breakdowns. Critical spares will however be kept so that a faulty valve or part can be rapidly replaced and nor repaired which could be a timeous procedure.</p>

COMMENT / ISSUES	RESPONSES
<p>2.10 Coastal Processes:</p> <p>According to the DBAR the facility is located landward of the 100yr erosion risk line / wave run up line. However, an analysis of the GIS tools available to this Department indicate that the majority of the site (including the fishmeal and oil processing facility) is located seawards of the 100 year risk line and even seaward of the 20 year erosion risk line. It appears as though the incorrect line was used to identify the 100 year coastal run up line. The line depicted in Figure 31 (pg. 55 of the DBAR) appears to be the draft Coastal Management Line (CML) and the 100 year wave run up line is indicated in the DBAR. Furthermore, the proposed procession plant is also located seaward of the Coastal Protection Zone (CPZ).</p>	<p>Cape EAPrac:</p> <p>This office accessed the latest online GIS version of the Garden Route District Coastal Management Lines on the DEA&DP Coastal Management App. The Coastal Management Lines shown on this map are the same as that provided in Figure 31 (an additional figure has been included for the Department's information).</p> <p>According to the TNPA Strategic Overview for 2019, one of the contributions to the strategic objectives for its ports is "Air quality management to reduce pollution/emissions from vessels and climate change impact studies to improve infrastructure resilience and operations stability". The long term planning for the Port of Mossel Bay includes expansion and infrastructure resilience with respect to climate change predictions.</p>

COMMENT / ISSUES	RESPONSES
<p>Sea level rise and climate change is associated with the increase in the number and severity of storm surges and erosion in areas along the coast. This poses a risk to development along the coast which could lead to damage or loss of property. The purpose of the risk lines and the CPZ is to avoid the increasing effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from the dynamic coastal processes, including the risk of sea level rise.</p> <p>The available scientific data indicates that the processing plant is at risk from the projected sea-level rise. However, no information regarding this has been included in the DBAR. This shortcoming must be addressed.</p>	<p>Cape EAPrac: Comment was received from the DEA&DP: Directorate Coastal Management as follows: 3.3 The SD: CM notes the proposed expansion falls landward of the CML but within the coastal protection zone (CPZ) as defined in Section 16 of the NEM:ICMA and delineated as part of the Garden Route CML Project in 2016. "The coastal protection zone is established for enabling the use of land that is adjacent to coastal public property or that plays a significant role in a coastal ecosystem to be managed, regulated or restricted in a manner that conforms to the purpose of the CPZ as prescribed in Section 17 of NEM:ICMA". It is however acknowledged that the proposed development will be located within the existing Mossel Bay Harbour footprint and is consistent with the Mossel Bay Integrated Development Plan (2017 - 2022); the Mossel Bay Municipality's Integrated Zoning Scheme (2017); the National Port Plan (2015); and the Mossel Bay Municipal Spatial Development Framework (2018) as in the Planning Statement for Erf 12459 (July 2019).</p> <p>The proposal is located within the precinct of the existing Port of Mossel Bay, as recognised by the SD:CM. The harbour is designed to minimise risk from coastal processes and is acknowledge as such by the SD:CM.</p>
<p>3. In accordance with Regulation 9 of the EIA Regulations, 2014, the format of the Basic Assessment Report has been determined by the Competent Authority (this Department). Your EAP is advised to ensure that the document and (including supporting documentation such as declarations etc.) comply with said format.</p>	<p>Cape EAPrac: This office used the latest version of the Basic Assessment Report template as provided by DEA&DP.</p>

COMMENT / ISSUES	RESPONSES
<p>4. The Department awaits the submission of the BAR as prescribed by Regulation 19 of the EIA Regulations, GN No. R982 of 4 December 2014. In accordance with Regulation 19 of GN No. R982 of 4 December 2014, the Department hereby stipulates that the BAR must be submitted to this Department for decision within 90 days from the date of receipt of the application by the Department, calculated from 23 October 2019. If however, significant changes have been made or significant new information has been added to the BAR, the applicant / EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30 day commenting period to allow registered I&APs to comment on the revised report / additional information.</p>	<p>Cape EAPrac: According to the Project Programme, calculated from an Application submission date of 23 October 2019 and excluding the holiday period between 15 December and 5 January, the Final BAR must be submitted to the Department no later than 11 February 2020.</p>
<p>If the BAR is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of Government Notice Regulation No. 982 of 4 December 2014 and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted and the prescribed application fee would have to be paid again.</p>	<p>Cape EAPrac: So noted. There have no significant changes made to the BAR, nor additional information provided. The GRDM requested some additions to the Air Impact Report (notably plans and maps that had already been included in the BAR).</p>
<p>5. Please note that one printed copy as well as two electronic copies (saved on CD/DVD) of the BAR must be submitted to the Department.</p>	<p>Cape EAPrac: So noted.</p>
<p>6. Kindly quote the above mentioned reference number in any future correspondence in respect of the application.</p>	<p>Cape EAPrac: So noted.</p>
<p>7. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an environmental authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F and 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution.</p>	<p>Cape EAPrac: So noted. The Applicant has been advised of this requirement.</p>
<p>8. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.</p>	<p>Cape EAPrac: So noted.</p>

COMMENT / ISSUES	RESPONSES
Kloppers, Lizette - Private	
Registered via email	Registered 20 March 2019
Kok, Christeline - Afro Fishing employee	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Kok, Marius - Afro Fishing employee	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Kotze, D - Mossel Bay Municipality	
Automatically registered as an I&AP.	Registered 22 February 2019
Krause, George - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Kriek, G.F. - Private	
Registered as I&AP	Registered 8 December 2019
Draft Basic Assessment	
I refer to a document received via the Mossel Bay Golf Estate Home owners explaining the establishment of the Fishmeal factory.	Cape EAPrac: Thank you for registering as an I&AP and for the submission of your comments.

COMMENT / ISSUES	RESPONSES
<p>First of I would like to comment on your motivation regarding the value of the investment and the jobs that will be created. It is not a fair assessment of the situation as the factory can be established in the Mossdustria area with the same investment value and job creation.</p>	<p>MPBS: As indicated on p. 23, Mossdustria is not a viable option for the following reasons: (1) The extra travel time implies that it will take longer to process the fish, which leads to degradation of the material and more likelihood of foul odours; (2) the more the fish is moved (e.g. from a vessel to a truck), the more tissue damage occurs, thus increasing decomposition; and maintaining the cold chain is more difficult when moving from vessel to truck; it is easier when pumping from the vessel directly into a hopper right on the quay.</p> <p>Afro Fishing: The nature of this operation is such that fresh raw material is supplied by fishing trawlers. These trawlers need to offload in fishing harbours and preferably directly to the processing factory to eliminate aging and damage to the fish. Fish meal plants also require sea water for cooling purposes which is not available inland. The idea is for Afro Fishing to diversify its current pilchard canning operation into anchovy and red-eye reduction as well. If this is not possible, then the project will not be viable due to the increased overheads. The cost and logistics involved to road transport the landed fish to other processing locations is also not viable.</p>
<p>You are “scare mongering” the community that you will not go ahead with the development if the facility is not established at the proposed site and that Mossel Bay will lose the investment and the creation of jobs. I believe that it is not fair threatening the Mossel Bay community and especially that part of the community that will be mostly affected by the facility. You are playing a political game which you are unable to control how it will end.</p>	<p>Cape EAPrac: It is not scare-mongering, but rather that the environmental impact assessment had found that the risks with locating the facility outside of the harbour significantly lead to negative impacts associated with odour due to the time to transport raw materials and increased trucks in the centre of town.</p> <p>Afro Fishing: Afro Fishing is not scare mongering but rather applying to do something that makes good economic and environmental sense and what has successfully been done before. The fact is that if the project does not comply with all the requirements then it will not go ahead.</p>

COMMENT / ISSUES		RESPONSES
<p>You mention that R300 to R350 million will be invested in Mossel Bay through this project as well as the creation of 341 to 560 jobs. Would there be any consequences for Afro Fishing if they do not achieve these targets. The way it works is that Afro Fishing is not contractually forced to abide by this “promise”. The reality is that nothing will happen and the community will be stuck with the problem.</p>	<p>Afro Fishing: If Afro Fishing gets approval for this project and the necessary funding is raised, it will be imperative for the project to perform so that the investment can be repaid. If this is not possible then the business will be liquidated as is normal in any business venture.</p>	
<p>08-Dec-19</p> <p>An issue is presented with the qualification of professionals involved. This is normal, the problem is that they will not operate the plant. In 10 years’ time will there be people available to operate a sophisticated RTO plan? A further challenge is that if there is a change of ownership, will they adhere to the same rules as Afro Fishing? How will you ensure that standard operating procedure will be maintained?</p>	<p>Cape EAPrac: Any licenses issued for the facility are issued to specific companies and responsible person. If the company changes hands, the new owner has to apply to have the license changed into their name and in doing so, accept all the conditions and requirements of the licensing. If the new owner does not comply, then the license can and will be suspended / retracted. Conditions of licensing for air quality requires that the correct level of competence to operate the plant is put in place. This is regularly monitored.</p> <p>Once a license is issued, the holder has to comply with the requirements. In the event that specific individuals leave, that does not mean that the requirements change. The public is still able to insist on compliance. The recommendations to have a forum that comprises of authorities, members of the public and the applicant will also aid in managing compliance.</p> <p>GRDM: If the plant is transferred to a new owner(s), or the CEO is replaced, the Licensing Authority is reserving the right to test the new owner(s) and / or CEO against the criteria for a fit and proper person and may refuse the transfer if the new owner(s) and or CEO is not fitting the required criteria.</p> <p>Afro Fishing: The RTO plant is actually easier to operate than a boiler. We are confident that the skills will always be available to operate such a plant. We are in a country where skills are been increasingly developed.</p>	

COMMENT / ISSUES		RESPONSES
	In the event of exceeding air pollution parameters will Afro Fishing be fined and or what type of remedial action will be taken. No local authority will close such facility down as in the end nobody will take responsibility if a problem should occur.	<p>Cape EAPrac: The district municipality, who are the responsible authority for air quality licenses has not hesitated to close down facilities with non-compliance, case in point South Cape Fishmeal who were operating out of Mossdustria. There will be very strict conditions placed on the management of odour which must be complied with,, the same applies to the requirements for the Coastal Waters Discharge Permit. Non compliance of permits and licenses will have consequences to the facility.</p>
	The establishment of a fishmeal facility right in the middle of Mossel Bay is a risk to the town as there is no long term guarantee that operating standards will be maintained.	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: Like any other business, standards and compliance will have to be maintained in order to survive. In fact, standards should improve over time as technology and processes advance. The EU based reference sites referred to by the application have been using RTO for more than ten years without problem. The one RTO supplier (German company Dürr Systems) has over 2000 successful installations.</p>
Krone, N - PetroSA (Pty) Ltd		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Kruger CJ - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES		RESPONSES
25-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Kruger, Eddie- Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Kruger, Christo - White Shark Africa		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Kruger, Paul - Mossel Bay Business Chamber		
	Registered as I&AP	Registered 10 November 2019
Lamb, E - Private		
	Registered as I&AP	Registered 9 December 2019
Public meeting / Information Session		
09-Dec-19	<p>Please note, your 10 year old company's webpage is not secure, and the video is not in operation. Being a NOT SECURE web site, I did not bother to read all the info.</p>	<p>Cape EAPrac: Thank you for your email. I have registered you as an Interested & Affected Party for the remainder of the Environmental Impact Assessment process to ensure that you receive future correspondence.</p> <p>Your comments will be collated and responses will be obtained from the various specialists on the project team. The final Comments & Responses report will be recirculated to all registered I&APs in the new year.</p> <p>Please note that our website does not contain nor require the use of login details by users, passwords, credit card details or banking details and as such the level of security is not high. The data however is stored on a server that is protected and continually monitored.</p>
	<p>It is presently not possible for me to be in Mossel Bay. My response on the Fishmeal & Oil Facility is long and critical, based on details provided in a kind of press release cum marketing article in the Mossel Bay Advertiser (21/11) of Afro Fishing's technical etc information provided at a public meeting held on 20th of November, 2019.</p>	<p>Cape EAPrac: It is unfortunate that you did not review the full set of documentation. Responses to your comments can be found below.</p>

COMMENT / ISSUES	RESPONSES
<p>My reply to the Advertiser is in Afrikaans because the majority of residents in MB are Afrikaans speakers.</p> <p>The same reply with questions still un-answered written to the MBA, apply to my comments requested by your company from interested & affected parties.</p>	<p>Cape EAPrac: Thank you for your submission, your responses have been included in Annexure F4a, however they have been translated to English in this document as per the Language Policy for EIA.</p>
<p>I am a share holder in a family residence against Santos hill, overlooking the harbour.</p> <p>I am an objective & critical independent thinker, as well as a GREEN activist trusting scientific facts only.</p>	
Draft Basic Assessment	
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	
<p>The “details” by a “panel of experts” Afro Fishing (AF) 's state of the art, fishmeal processing plant and as detailed in the Mossel Bay Advertiser (21/11/2019) also necessitates critical questions from a different perspective. So allow me to disagree with this selective information.</p>	
<p>To compare the V&A Waterfront with Mossel Bay's port on the Indian Ocean is to compare apples to daisies. If the control of bad smells in Cape Town harbour is so effective, why then does AF boast about their new technology, apparently similar to the fishmeal factory in Peniche, Portugal? Is it because that plant complies with EU standards or is likely to have interests in the fishing industry of Angola (former Portuguese colony)?</p>	<p>Cape EAPrac: The comparison is made to illustrate the point that a fishmeal facility that is well operated can be developed next to a high intensity tourism operation. The proposal to include the RTO is to make absolutely sure that the town is not affected by malodours. It will also then comply not only with South African standards but also EU standards.</p> <p>Afro Fishing: The Waterfront factory applies water and chemical scrubbing and has no problems. The MB factory will have scrubbing and RTO technology to remove odours. We are merely making the comparison to indicate that this project will install further odour abatement measures such as those used in the EU and other countries.</p> <p>No, Afro Fishing has no interests in Angola or Portugal.</p>

COMMENT / ISSUES	RESPONSES
<p>The investment of R300 - 350 million is believed to come from abroad. The local public is still kept in the dark about which country (s) and who the investor (s) are in this company. Who are all directors, how many shareholders and which country (s) are the buyers of AF's fishmeal and oil?</p>	<p>Afro Fishing: Just because a local journalist or activist writes articles saying that Afro Fishing for example does not want to state who its directors are does not make her news TRUE. She has for example received a formal email from me in July 2019 already stating these details. She however refuses to acknowledge this information because it does not fit the narrative she wants to be writing about. She has walked out of a meeting in my office saying I am providing her with too much details. She then writes that I am denying her information so please do not accept that everything you read online is true.</p> <p>Regarding funding: We are in discussion with our local bankers in this regard. Directors: Johan Breed and Shamera Daniels (both South African)</p> <p>Owner of Afro Fishing: Mossel Bay Processors (Pty) Ltd (owner of this entity: Johan Breed and an empowerment trust)</p> <p>Product will be exported to many countries (e.g. China, Hong Kong, Turkey, US, etc)</p>

COMMENT / ISSUES	RESPONSES
<p>Once again, AF also holds the carrot of "job creation" as the holy grail of "economic progress" for Mossel Bay. However, no promise of shares for the actual fishermen (whose quotas are used) and employee representation at their Directors' meetings. AF promises work for "560" persons: will these people now be paid full time for 52 weeks a year, while AF will apparently only function intensively for 4-8 weeks? What benefit does AF's profit from the coastal town and the wider community have, e.g. donations for necessary facilities etc?</p>	<p>Afro Fishing: Yes the current cannery and the new venture will employ both permanent and seasonal workers. The permanent staff will be employed for 52 weeks and the seasonal workers when fish is processed as is the situation in the fishing sector, in the agricultural sector and many other sectors in SA.</p> <p>Yes, you are correct a big winner in this investment will be the boatowners who own the boats and the rightsholders who own the quotas. Both the boatowners and rightsholders nowadays comprise PDI's so the biggest winners will be black empowerment and job creation.</p> <p>With regards profits, AF is currently a level 1 B-BEEE company and in order to achieve this status we must invest in social development, enterprise development, skills development and supplier development projects. Our approach is to only invest in Mossel Bay and the Garden Route District. With regards the project construction phase, the aim is to also use local contractors and suppliers wherever possible.</p>
<p>Whose bread man eats, the word man speaks. Notable is the absence of impartial marine biologists or ecologists on AF's expert panel during the briefing. Only involved are engineers, aerial and environmental specialists (lg.is only concerned with the immediate environment at the port of AF's new building and as their PPP facilitator).</p>	<p>Afro Fishing: This is because the fish stocks are separately managed by the Department of Fishing and Scientific Working Groups.</p>

COMMENT / ISSUES	RESPONSES
<p>With state of the art technology, today's industry's new buildings are expected to pursue "green" status, using only renewable energy and water, and not using harmful fossil fuels and products such as polypropylene, but bio-based packaging. On this, the "details" from AF are silent, probably because the local municipality does not yet require it?</p>	<p>Cape EAPrac: If you had read the reports you would note that Afro Fishing is planning to install up to 1MW of solar panels on the rooves of the buildings to improve green energy use. Furthermore the current factory currently uses multiple water saving mechanisms, all which will be continued in the new buildings if approved.</p> <p>Francois van Zyl: AF has committed themselves to embarking on employing green design principles as far as possible. The challenge is to create a balance between renewable and conventional energy requirements.</p> <p>Afro Fishing: AF are not silent in this regard. It is obvious that AF will use whatever renewable energy as is possible. It will not be prudent to rely solely on Eskom in this day and age. Our model that was shown at the public participation meeting indicates solar panels on the north facing roofs. We are hoping to achieve at least 1MW of solar energy if possible. We are also exploring gas and wood chip boilers, etc.</p> <p>Francois van Zyl Architects: AF has committed themselves to embarking on employing green design principles as far as possible. The challenge is to create a balance between renewable and conventional energy requirements.</p>
<p>Apparently AF considers pollution of a bad fish odour as their industry's only local problem to solve. With detailed details of how their factory will function, the community is drawn to the eyes. Are AF owners aware of the crisis due to global warming causes and devastating effects on land and in the oceans, or are they Trumpian deniers? What happens in Mossel Bay and the sea there also affects the entire country and the entire planet. Local authorities should only recruit and allow environmentally friendly industries.</p>	<p>Cape EAPrac: Odour issues have been highlighted throughout the public participation as the most important issue, as such it will naturally take centre stage. However this is not the only item that has been assessed, all of which is included in the reports that are available on the website, from the library or at the municipality and on request directly as a CD.</p> <p>Afro Fishing: This project is multi-faceted and of course global warming is a factor. The increase in anchovy and red eye herring on the south coast (and which forms part of the motivation for this venture) could be entirely due to global warming and the migration of fish stocks.</p>

COMMENT / ISSUES	RESPONSES
<p>Who conducted any impact study on the local marine life and environment for AF's proposed processing of "1,000 tonnes per day of raw fish" (i.e. 2 million pounds weight or 1,000 one-ton pickup loads per day) and for that given green light is unknown. Apparently, directors of AF's "extensive fishing industry experience plus their own freezing facilities, fish meal plants, fishing vessels and canneries in Angola and Namibia" (van Zyl in an interview 24/7/19) are considered more important than the research by scientists.</p>	<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so.</p>
<p>According to AF, anchovies are: "in abundance in SA waters" and "because it is so oily and small with a short life, it can only be harvested" and reduced to fishmeal and oil. (By the way, the Italians are known for their pickled la alice / anchovies as delicacies). Fishmeal is used intensively for aquaculture, as well as antibiotics to keep the caged fish healthy, but contributes to seawater pollution and the poisoning of animals and humans due to the antibiotic resistant bacterium in seafood (The Conversation, 1 Dec 2019)</p>	<p>Afro Fishing: I agree, some EU countries do cure and salt anchovies for human consumption purposes. This is even been done in South Africa. The point is that the food and pizza market can absorb maybe 500 tons of anchovy for this purpose. The local allowable catch last year was 350,000 tons. There is no human consumption market to absorb this quantity of anchovy. The EU countries are also able to produce the salted and cured product because their anchovy species is bigger than ours. Our fish is small (8-11cm) and not conducive to filleting processes.</p> <p>Most animal protein is fed feed with antibiotics.</p>
<p>Unfortunately, AF's assumptions of an abundance of anchovies are somewhat opportunistic. The existence of these fish is not exclusively for fishmeal factories. According to SANBI and marine researchers at UCT, have pelagic fish a major target in the oceans and are not as "abundant" as some fishermen claim:</p>	<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so.</p>

COMMENT / ISSUES	RESPONSES
<p><i>“Pelagic fish form an important link in the marine food web where they transfer energy produced by plankton to large-bodied predatory fish, seabirds, and marine mammals”.</i></p> <p><i>“Sardinops sagax, and other small pelagic fish such as anchovy (Engraulis encrasicolus) ... are important forage fish for larger forms of marine life.... the main prey of a variety of predators such as yellowtail, hakes, tuna, and sharks; marine mammals such as seals, dolphins and whales; and seabirds such as African penguin and Cape gannet...</i></p> <p><i>The ocean is affected by multiple anthropogenic stressors including climate change, the effects of which are already evident in many ocean ecosystems.... changes in the Benguela have already been observed, with a turning point in the early 1990s leading to a warming of the waters on the west coast of South Africa. Fishing pressure and environmental shifts outline the role that maintaining high fishing pressure on the west coast played, while the stock had shifted south and east ... a decline in the relative abundance of adult anchovy and sardine after 2000 (e.g., Coetzee et al., 2008; Mhlongo et al., 2015) led penguin populations to plummet.... The Agulhas Bank is an important area for the spawning of small pelagic fish and other species.</i></p>	<p>Afro Fishing: Correct. The species is however sustainably managed by the Department of Fisheries and the Scientific Working Groups. Historical data shows the biomasses of anchovy and red eye herring to be fairly consistent over many years.</p>
<p>Compare e.g. the 2019 south and west coast of the US with the US west coast in 1960: due to high demand for fishmeal and oil and canned fish, as well as the loss of habitat is the sardine (<i>Sardinops sagax caerulea</i>), on the California coastline in the early Caught 1960s to the point of extinction. Under the protection of a strict moratorium on the commercial catch of sardines in 1967, this fish population only began to show signs of recovery 20 years later.</p> <p>Even in the document: (Annexure K4: DAFF Final Sardine TAC & Anchovy TAB Adjustment 2019 (provided by EAPrac Environmental Consultants) is warned: The pelagic industry... should continue to take appropriate steps to attempt to keep the sardine by-catch as low as possible by avoiding areas where a relatively high proportion of sardine is found mixed with anchovy schools.</p>	<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so, as shown in Annexure K4.</p>

COMMENT / ISSUES	RESPONSES
<p>Who or what is playing watchdog at night for catching AF and other industries sardines, anchovies and other pelagic fish species?</p>	<p>Cape EAPrac: As stated above, the Department of Fisheries is responsible for the allocation of quotas and for the monitoring of the fisheries.</p>
<p>Once again, residents and faithful taxpayers were subjected to a tyranny of selective information, promises and manipulated with "high tech" facilities to win their favour during a one-sided information meeting by AF's selected panel of experts. Oogverblindery. No unattached marine biologist was present as an "expert". No scientists to inform the audience about the latest research and verifiable facts, and to answer questions about marine ecology, environment, conservation or the current situation around our coastline.</p>	<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so, as shown in Annexure K4.</p> <p>Afro Fishing: If AF were manipulating the system, we certainly would not have commissioned a reputable Garden Route District environmental consultancy and the best air quality consultant in the country. We certainly would not have spent the vast amount of money we did on impact studies. We have jumped through every hurdle to present a professional and comprehensive BAR application.</p> <p>Unfortunately, there is a local activist who publishes the narrative she wants put out to the public. It does not mean that her news is TRUE. This same activist has walked out of my office saying i am giving her too much details. She does not want to hear the truth as it does not fit with her sensationalist articles.</p>
<p>Public Participation Processes (PPPs) are rarely a mutual conversation where objectors are taken seriously, but merely a difficult formality for the applicant to finalize. The public's comments are also just a procedure for the relevant authorities who may only consider applications but rarely reject them, if ever. Political parties that continue to ignore the warnings of climate scientists globally and are unwilling to e.g. applying the UN's COP25 proposals in their lands and municipal areas should be voted out at the polls.</p>	<p>Cape EAPrac: Public Participation is a vital process that the departments who authorise projects take close note of. It has been of vital importance in this process in ensuring that all relevant concerns are addressed, including conclusively showing that the RTO is a very effective mechanism to ensure that no discernable odours will be noticed outside of the facility.</p> <p>It has also led to the recommendation for conditions regarding monitoring forums and protocols for addressing complaints.</p>

COMMENT / ISSUES		RESPONSES
Lamprecht, Elset - Private		
	Registered via email	Registered 20 March 2019
Background Information Document		
20-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Lamprecht, Gustav- Private		
	Registered via email	Registered 26 March 2019
Background Information Document		
26-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Lamprecht, Heinrich - Private		
	Registered via email	Registered 22 March 2019
Background Information Document		
22-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Langeveld, Lenique - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		

COMMENT / ISSUES		RESPONSES
25-Mar-19	The possibility that there were irregularities and double standards with the licensing authority, Garden Route District Municipality as well as the local municipality must be investigated.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: The possibility that this is 'false information' concocted by Mr Coetzee has been referred to above.</p>
	Concerned about the double standards in the municipality.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: The possibility that this is 'false information' concocted by Mr Coetzee has been referred to above.</p>
Le Roux, Ruan - Private		
	Registered as I&AP	Registered 11 December 2019
Draft Basic Assessment		
	Please see attached objection against the proposed Afro Fishing Fishmeal & Fish Oil Reduction Facility.	
	I am of the opinion that the proposed Afro Fishing Fishmeal and Oil Reduction Facility will have the following negative impacts on the Mossel Bay environment:	
	1. The proposal will have a fundamental impact on the recreational fishing of Mossel Bay as the proposed fish that will be used for the proposed Fishmeal and Fish Oil Reduction Facility is the main food source of the larger fish (game fish) such as the Bonita, Garrick, Tuna etc that is caught by recreational fisherman.	<p>Afro Fishing: As noted in several responses the fishing stocks are sustainably management by the Department of Fisheries and the scientific working groups.</p>

COMMENT / ISSUES	RESPONSES
<p>2. If these large schools of fish known as "bait-balls" are caught in the deep sea they will not be able to travel into the shoreline / bay of Mossel Bay forcing the game fish to move away. This is evident from the past when the Mackerel was fished by trawlers which had a severe impact on the recreational fishing of Mossel Bay. The recreational fishing has only recovered to its full potential the last two years since the "bait-balls" are able enter the bay / shoreline.</p>	<p>Afro Fishing: As noted in several responses the fishing stocks are sustainably management by the Department of Fisheries and the scientific working groups.</p> <p>The bait balls you refer to have not been seen sighted by local trawlers due to the current low biomass of sardines and the prevalence of sardine currently more towards Port Elizabeth.</p>
	<p>Cape EAPrac: That is not correct. The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port, which has also been adopted into the municipal SDF and IDP. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: The two activities are different from a recreational (tourism) perspective and do not impact each other. Development of the local economy is a key priority of the Municipality which includes manufacturing activity and tourism, two different sectors that both contribute. They surely cannot be considered as mutually exclusive. From an economic development perspective, that does not make sense.</p>

COMMENT / ISSUES	RESPONSES
<p>11-Dec-19</p> <p>3. Recreational fishing is one of the major aspects of the tourist sector of Mossel Bay and all the documents such as the Mossel Bay Municipal Spatial Development Framework, 2018 and IDP focus on stimulating and promoting the tourism sector of Mossel Bay. It is clear that the proposed Afro Fishing Fishmeal and Oil Reduction Facility is not in line with these documents.</p>	<p>DELplan: We strongly dispute this argument since the named documents (Mossel Bay Municipal Spatial Development Framework and IDP) stipulates and acknowledges that the Port of Mossel Bay is a crucial assets for Mossel Bay as a whole. The IDP supports the harbour development project to its fullest. A CBD and harbour development precinct plan have been adopted in 2013. The Transnet National Ports Authority has approved the proposed harbour developed and is currently soliciting input from all stakeholders through the process of expressions of interest.</p> <p>The Mossel Bay Harbour has a great potential to utilize the current buildings on the subject property and to develop these buildings to its fullest. The proposed development is an indicator that investors still want to develop the current harbour and expand the ancillary uses.</p> <p>The SDF (2018) states that opportunities include that “The municipality is extremely fortunate to have these two assets (the CBD and the Mossel Bay Port), particularly if it is to make serious inroads into maximizing business potential and reducing unemployment.”</p> <p>The Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p> <p>Since the development of the harbour, businesses and industries have developed in and around the harbour. Thus, the expansion of the harbour will exploit business opportunities.</p> <p>Furthermore, this proposed development will cater for 560 employment opportunities and will reduce the local unemployment rate.</p> <p>Thus, it can be argued that the proposed development will develop the harbour to its fullest and utilize current buildings on the subject property.</p>

COMMENT / ISSUES	RESPONSES
<p>4. The proposal might have the opportunity to create jobs however at the cost of hundreds of current jobs created by the recreational fishing and tourism industry which will have a negative impact on the livelihoods that depend on the recreational fishing industry.</p>	<p>MPBS: It is not clear from the comment how recreational fishing could be negatively impacted by the proposed development. Furthermore, there is no evidence for the "loss of hundreds of jobs" due to the proposed development. This euphemism does not contribute to finding a balanced to stimulate local economic development. As stated above, the operation should not have a significant effect on tourism, property values or sense of place if the precautionary measures undertaken by Afro-Fishing are implemented.</p>
<p>5. It should also be noted that numerous businesses in Mossel Bay depend on the individuals that visit our coastline for the recreational fishing experience which is exceptional in the Mossel Bay area and it provides a definite boost to the local economy.</p>	<p>MPBS: It is not clear from the comment how recreational fishing could be negatively impacted by the proposed development.</p>
<p>6. No study has been conducted to indicate what the proposed Afro Fishing Fishmeal and Oil Reduction Facility will have on the recreational fishing of Mossel Bay, which include the natural fishing patterns and the game fish which depend on these "bait-balls" for survival..</p>	<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted.</p> <p>A Socio Economic Impact Assessment was undertaken and considered the tourism industry as a whole.</p> <p>MPBS: It is not clear from the comment how recreational fishing could be negatively impacted by the proposed development.</p>
<p>The impact of the proposed Afro Fishing Fishmeal and Oil Reduction Facility on the recreational fishing should be strongly investigated before Environmental Authorisation is granted. As a recreational fisherman, I strongly oppose the proposed Afro Fishing Fishmeal and Oil Reduction Facility.</p>	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>
<p>Le Roux, Nickey - Mossel Bay Municipality</p>	

COMMENT / ISSUES	RESPONSES
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Liddle, Mercia - DEA&DP Directorate: Biodiversity and Coastal Management	
Registered as case officer on receipt of comment	Registered 23 December 2019
Draft Basic Assessment	
1. The request for comment from this Department's sub-Directorate: Coastal Management on the above-mentioned Environmental Impact Assessment, received via post on 12 November 2019, refers.	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>
2. The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (NEM:ICMA) is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA). the NEM:ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM:ICMA, the Department of Environmental Affairs and Development Planning (the Department) is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations".	<p>Cape EAPrac: So noted.</p>
The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme (PCMP). The PCMP is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. A key priority of the PCMP is the Estuary Management Programme, which is predominantly implemented through the Estuary Management Framework and Implementation Strategy (EMFIS) project. The Department is implementing estuary management in accordance with the NEM:ICMA and the National Estuarine Management Protocol (NEMP). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone.	<p>Cape EAPrac: So noted.</p>

COMMENT / ISSUES	RESPONSES
<p>3. The sub-Directorate: Coastal Management(SD:CM) has reviewed the information as specified above and have the following commentary:</p>	<p>Cape EAPrac: Thank you for taking the time to submit your comments.</p>
<p>3.1 Due to the effects of climate change, it was predicted that the Western Cape would experience, inter alia; changes in temperature, decrease in rainfall and an increase in the frequency and magnitude of storm surges along the coast. It is in light of this complex and dynamic nature of the coastline that the NEM:ICMA was promulgated. The NEM:ICMA provides a framework for the integrated management of the coast with the aim of preserving, protecting, extending and enhancing the status of coastal public property and securing equitable access to the benefits and opportunities of the coast. As such, the NEM:ICMA provides for various zones and provides a framework for the management of these zones.</p>	<p>Cape EAPrac: So noted.</p>
<p>3.2 In July 2018, the Department finalised the technical delineation of the Garden Route District Coastal Management Line (CML) project to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk to flooding, wave run-up modelling, inter alia, and was delineated in conjunction with and supported by other organs of state including the Local and District Municipalities, CapeNature and all other organs of state represented on the steering committee for the Garden Route CML project.</p>	<p>Cape EAPrac: So noted.</p>

Dec-19

COMMENT / ISSUES	RESPONSES
<p>23- 3.3 The SD: CM notes the proposed expansion falls landward of the CML but within the coastal protection zone (CPZ) as defined in Section 16 of the NEM:ICMA and delineated as part of the Garden Route CML Project in 2016. "The coastal protection zone is established for enabling the use of land that is adjacent to coastal public property or that plays a significant role in a coastal ecosystem to be managed, regulated or restricted in a manner that conforms to the purpose of the CPZ as prescribed in Section 17 of NEM:ICMA". It is however acknowledged that the proposed development will be located within the existing Mossel Bay Harbour footprint and is consistent with the Mossel Bay Integrated Development Plan (2017 - 2022); the Mossel Bay Municipality's Integrated Zoning Scheme (2017); the National Port Plan (2015); and the Mossel Bay Municipal Spatial Development Framework (2018) as in the Planning Statement for Erf 12459 (July 2019).</p>	<p>Cape EAPrac: So noted. It is understood that a port or harbour has by its nature created an area that is protected from coastal processes.</p> <p>According to the TNPA Strategic Overview for 2019, one of the contributions to the strategic objectives for its ports is "Air quality management to reduce pollution/emissions from vessels and climate change impact studies to improve infrastructure resilience and operations stability". The long term planning for the Port of Mossel Bay includes expansion and infrastructure resilience with respect to climate change predictions.</p>
<p>3.4 It is noted that the Afro Fishing Fishmeal & Oil Reduction Facility EMPr (2019) and the draft BAR states that the discharge water is not expected to contain any effluent or solids. Furthermore, the seawater taken up by the pipeline near the plant in order to cool down the fish processing process, will be returned to the sea at a temperature of approximately 10°C warmer. The SD:CM is concerned that the effluent will be discharged at a much higher temperature than that of the receiving environment. It is recommended that measures be put in place to ensure that there is not a significant difference in the temperature of the effluent and that of the receiving environment.</p>	<p>Cape EAPrac: Please note that the return water is expected to increase by no more than 10°C from its abstraction temperature however, in order to comply with the CWDP temperature requirements, it must be allowed to cool down to the required temperature before reaching the discharge outfall.</p> <p>Afro Fishing: The added discharge will be for water used for condensation. There are no pollutants in this water and it does not come into contact with any fish or processed fish. This is the volume that is increased.</p> <p>The intention however is to improve the existing cannery discharge water quality as part of the expansion project. A DAFF unit and settling tanks will be installed. All protein collected here will then be included in the fishmeal processing. This is now possible as the skimmed solids can be put through the fish meal plant. The settling tank will also provide time for the return water to cool down further.</p>

COMMENT / ISSUES		RESPONSES
3.5	The suggestion in the EMPr to have a sampling plan in place to measure any and all changes in the receiving environment around the outlet pipe and to identify possible pollution to the seawater resources. The applicant is advised to strictly adhere to the conditions set out in the requested amendment Coastal Waters Discharge Permit.	Cape EAPrac: So noted.
3.6	As the potential odour from the facility appears to be a major concern for the public (based on the media coverage this proposed expansion has received), the applicant is advised to ensure that the odour generation be reduced substantially by adhering to the recommendations in the draft BAR.	Cape EAPrac: The implementation of the RTO will ensure that odorous emissions remain below the odour detection thresholds. Furthermore, this recommendation is non-negotiable and must be a condition of authorisation.
4.	The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically 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, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.." together with Section 58 of the NEM:ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.	Cape EAPrac: So noted.
5.	The SD:CM reserves the right to revise its comments and request further information based on any information that may be received.	Cape EAPrac: So noted.
Lodge, Karol - Private		
	Registered via email	Registered 25 March 2019
Loubser, Martie - Lower Town Neighbourhood Watch		
	Registered via email	Registered 4 March 2019
Loubser, Pieter - Beacon Wharf		
	Registered as I&AP	Registered 10 December 2019
Draft Basic Assessment		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		
	Please note our objection to the above planned fish factory on the front porch of our property at Beacon Wharf.	Cape EAPrac: Thank you for your registration and participation.

COMMENT / ISSUES		RESPONSES
10-Dec-19	We are particularly opposed to the air and noise pollution it will cause when thought of all the boats and trucks, not to mention the unpleasant odour associated with it.	<p>Cape EAPrac: Please review the documents available.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: The air and noise pollution will not exceed the current levels of harbour activity. The harbour is also zoned for industrial and warehousing activities.</p> <p>Urban Engineering Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility is located within a working harbour.</p>
	It is definitely going to negatively impact the value of our property.	<p>MPBS: Our research of academic international case studies on the effect of fish meal plants on property values in the surrounding area, did not offer a scientific basis that through research indicates that fish meal factories negatively impact property value. One would assume that if precautionary measures and the necessary mitigation is introduced that impact would be negligible. If the precautionary measures are implemented as envisaged by Afro-Fishing, there should not be any foul odours - and thus no or minimal negative impact on surrounding landowners should be the result.</p>
Loubser, Thea - Beacon Wharf		
	Registered as I&AP	Registered 10 December 2019

COMMENT / ISSUES		RESPONSES
Lourens, Dewald - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Louw, Cobus - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Lubbe, Annalise - Carte Blanche		
	Registered via email	Registered 18 September 2019
Ludick, Gert - TNPA		
	Automatically registered as an I&AP.	Registered 22 February 2019
Draft Basic Assessment		
	<p>We are committed to a waterfront development on the eastern side of the Port – this development (waterfront) and the proposed development by Afro Fishing can co-exist in the Port of Mosselbay. The Port will NOT in any way change the use of the harbour to be majority tourism related – we will fulfil our mandate as per the National Ports Act of 2005. We will however take due note and be sensitive to the tourism industry as part of our development strategy to ensure that the economic activities are sustainable and complementary (are able to co-exist) in a structured and well planned manner.</p>	<p>Cape EAPrac: Thank you for providing your input into the planning and development of the port as envisaged under the National Ports Act.</p>

COMMENT / ISSUES		RESPONSES
20-Dec-19	<p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>	<p>Cape EAPrac: So noted. It is understood that the TNPA determines the port development plans and not the local municipality.</p>
Makhathana, Polisa - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Mandini, Nyaniso - SeaVuna		
	Registered as I&AP	Registered 10 November 2019
Manie, Gailin - Afro Fishing employee		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Manse, Alene - Afro Fishing employee		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Manuel, Warren - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Draft Basic Assessment		
	<p>Thank you for the opportunity to comment on the Draft Basic Assessment Report (Draft BAR) for the proposed Afro Fishing (Pty) Ltd Fishmeal and Fish Oil Reduction Facility at Quay2, Mossel Bay Port. Mossel Bay Municipality acknowledges the potential economic benefits of the proposed activity but given the scope and nature of the proposed activity, we would like to comment per Municipal Department as follows:</p>	

COMMENT / ISSUES	RESPONSES
<p><u>Building Control:</u> Any building plan submission must comply to the National Building Regulations and Building Standards Act No 103 of 1977.</p> <p>Comments will be requested from all the relevant stakeholders and Departments when assessing the submitted building plan for their comments and inputs.</p> <p>Due to the location of the proposed structure, the application will also have to be tabled at the Heritage and Aesthetics Advisory Committee of the Municipality for their comments and support.</p>	<p>Cape EAPrac: So noted. Please refer to Annexure E1 of the Draft BAR for the submission from Heritage Western Cape regarding the heritage and built environment decision. It must be noted that the proposal replaces the existing old I&J fish processing facility which has been standing neglected and defunct since 2012.</p>
<p><u>Spatial Planning:</u> 1. Applicable Local Spatial Frameworks / Documents The following are extracts from the Mossel Bay Spatial Development Framework 2018 and Mossel Bay Central Precinct Plan as it relates to the Mossel Bay Port and CBD area:</p>	

COMMENT / ISSUES	RESPONSES
<p>1.1 Mossel Bay Spatial Development Framework 2018: Status Quo Report</p> <p>1.1.1 Port:</p> <p>The port represents a significantly underutilised waterfront asset, thereby providing major upside potential. The most expensive items of a harbour are the marine work which private operators, whether in the shipping, fishing or tourism industries can seldom afford. These usually have to be provided by the state.</p> <p>The port is well located in relation to the historic CBD, thus, well placed to provide another major boost to the local economy if the institutional challenges around access to the harbour can be resolved.</p> <p>The rail line also terminates in the harbour thus potentially providing freight and passenger tourism transport opportunities.</p>	<p>Cape EAPrac:</p> <p>The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA:</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p> <p>We will improve the use of the rail service through the Port</p>

COMMENT / ISSUES	RESPONSES
<p>1.1.2 Mossel Bay Precinct Plan: Local Structure Plan 2013 (MBCPP): The port is used predominantly by the fishing industry. The port utilises a total area of 18 hectares of which the fishing industry is the largest user. Various proposals for development of the inland area of the port were considered in the past but were abandoned for several reasons. There are valuable underutilised land assets separating the CBD and the port with limited linkages, of which the future utilisation thereof had to be considered in the MBCPP. The CBD has a distinctly unique character, which needs to be enhanced. The partnership and involvement between the public and private property owners is paramount to the successful implementation of any recommendations presented in the MBCPP.</p>	<p>TNPA: We are in the process of obtaining the adjacent properties back from Transnet Properties to be part of TNPA, to support the Oil and Gas as well as Fishing industries, land to the far eastern side will complement the Tourism sector.</p> <p>DELplan: The Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES	RESPONSES
<p>Intervention is needed in the spatial land use pattern and economic strategies to induce growth in the free market economy with facilitative government resources to ensure optimum use of limited resources in the local economy. With the above current reality as a point of departure the MBCPP was compiled and the unutilised sites on port land was identified to play an important role in the solutions offered for the CBD.</p> <p>The focus of this report is the functionality of the port within the policy framework of the TNPA whilst the underutilised sites in the port area that were identified in the MBCPP for the purposes of development other than harbour activities, are considered.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
	<p>DELplan: The Port of Mossel Bay was not developed to be a tourist attraction. It was developed for the oil industry and fishing industry. Throughout the TNPA's plans, the Waterfront and the tourist facilities are only a portion of the harbour and the western part of the harbour will remain for fishing industries.</p> <p>Furthermore, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>
<p>1.1.3 Mossel Bay Economy Around the world local and national economies that recovered well after the 2008 global financial crisis vested on agricultural, Agri-processing and tourism sectors. Mossel Bay's growth in Agriculture, Manufacturing and Services has been in line with this trend. Mossel Bay appear to benefit from it being considered as nice places to live with regards to lifestyle and scenic attractiveness and coastal Garden Route location. These attractive qualities must be enhanced and not undermined.</p>	<p>MPBS: The proposed redevelopment entails a state-of-the-art processing plant that will contribute to the agricultural (i.e. fishing) and Agri-processing sectors, i.e. two of the sectors mentioned in the comment.</p>
<p>1.1.4 Tourism: Mossel Bay Municipality has the opportunity to become a tourism mecca especially if the following is attended to: - Management of appearance of urban development alongside scenic routes including the N2; - Precinct wide upgrading of Mossel Bay town CBD; - Integration of harbour with CBD and establishment of waterfront project; - Revival of Outeniqua choo-choo as tourist passenger and freight services between Mossel Bay and Knysna.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: The proposed redevelopment entails a state-of-the-art processing plant that will represent an upgrade of a significant portion of the commercial harbour.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA:</p> <p>The waterfront development is on the eastern side, the western side will remain fully operational port activities with expansion of the breakwater and footprint to the north and west. The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
<p>Mossel Bay appears to have a strong appeal to foreigners and tourists. Asses include:</p> <ul style="list-style-type: none"> - Passenger liners dropping anchor in the bay from time to time for excursions although it appears that few actually spend time in Mossel Bay CBD. - The Diaz Museum with its international maritime history. 	<p>TNPA:</p> <p>TNPA plans to see how to improve the access for cruise liners – eastern side (Quay 4)</p> <p>MPBS:</p> <p>This is a statement; no response is required.</p>

COMMENT / ISSUES	RESPONSES
<p>1.2 Mossel Bay Spatial Development Framework 2018: Spatial Proposals</p> <p>1.2.2 Urban quality: Mossel Bay CBD comprises a potentially outstanding heritage precinct of historic buildings which is still largely intact. This is probably due to the movement of businesses to new shopping areas in Voorbaai and along Louis Fourie Road after the N2 was built. While colonial origins of this heritage cannot be ignored, if properly maintained and managed, the entire CBD could become a tourist honeypot. Already, international cruise liners drop anchor in the bay and provide shore side excursion. Mossel Bay port offers potential for an attractive seaside waterfront experience within convenient walking distance of the CBD but this is not being realised at present although Transnet has recently produced a plant to upgrade this facility.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port. Please refer to Annexure E1 of the Draft BAR for the submission from Heritage Western Cape regarding the heritage and built environment decision. It must be noted that the proposal replaces the existing old I&J fish processing facility which has been standing neglected and defunct since 2012.</p> <p>DELplan: The Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA: In line with the National Ports Act 2005: The Port is mandated to develop an effective and productive Port industry that is capable of contributing to the economic growth and development of our Country.</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
<p>1.2.2 The port and the historic CBD offer potential as significant new tourism products to extending Mossel Bay's already considerable attractions. These appear to have enabled it to rebound so successfully from the 2008 global financial crisis. The municipality is extremely fortunate to have these two assets, particularly if it is to make serious inroads into maximising business potential and reducing unemployment.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: This is a statement; no response is required.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA:</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
<p>1.2.3 Challenges:</p> <p>The port vests in National Government creating a challenge in achieving coordination and alignment between these two spheres.</p> <p>The need for strong leadership and guidance to stimulate the urban renewal of the historic CBD in a way that enhances rather than detracts from its potential attractions.</p>	<p>Cape EAPrac:</p> <p>The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>DELplan:</p> <p>The Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA:</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
<p>1.2.4 Urban Development: Redevelopment and small-scale intensification in the CBD heritage area should be promoted and guided by general heritage guidelines and the Central Precinct Plan (final draft 2013). The municipality and the Transnet should collaborate on an integrated project that maximises the ports shipping and mixed-use waterfront potential and seamlessly integrates with the CBD.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>DELplan: The Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p> <p>Francois van Zyl Architects: This has been promugated for the past 30 years, but wil not happen because tourism is not a core industry for PORTNET. If the 'waterfront' eventually happens, it will only cover the section from Quay 4 to the yacht club, which is probably the size what it should be. The rest of the harbour will remain fishing- and oil industry-related, that can include a fish meal plant, of which the smell can be managed to below allowable standards and away from the waterfront development, in designated industrial-zoned areas on Quays 1-4.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA: Waterfront comments as above. We do support port city integration, this is managed via the PCC port consultative committee under the chairmanship of the DOT. Refer to Section 81 of the national ports act.</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
<p>1.2.5 Urban Restructuring: Incorporate the rail link from to the Port. The Historic CBD must be repurposed as a tourist node. The harbour should be redeveloped with a strong tourist and mixed-use waterfront including berthing cruising ships.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>DELplan: The Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA: We are planning the redevelopment of the Port including expansion to support : Oil and Gas Fishing Ship Repair and building Tourism Other economic opportunities are also being identified to create a bigger and better port.</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
<p>1.3 Mossel Bay Central Precinct Plan 2013</p> <p>The CBD has a distinctly unique character and heritage which needs to be enhanced and preserved. The partnership and involvement between the public and private property owners is paramount to the successful implementation of any recommendations presented in this plan. Mossel Bay is positioning itself as a prime tourist destination and relies on the revenue created by tourism. Of importance is that both the CBD and the Port, operate with a united vision of promoting and facilitating local economic development and tourism and that recognition be given to the interdependency both entities has upon each other in order to function at their optimal best.</p>	<p>Cape EAPrac:</p> <p>The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS:</p> <p>This is a statement; no response is required. It should be noted that the Port does not fall under the same planning regime of the Municipality. TNPA prepares long-term development plans for their ports and introduce and implement the plans over time.</p> <p>DELplan:</p> <p>Although the Mossel Bay Central Precinct Plan (LSP) indicates that the surrounding areas of the harbour must be developed as a waterfront and ancillary businesses, the LSP did not examine the expansion of the current footprint of the harbour fishing quay. Nonetheless, the LSP states “The ultimate goal of incentives is to induce growth in targeted areas, creating jobs and stimulating construction in stagnant areas while creating long term positive tax revenue.” It can be argued that the proposed development directly addresses the needs of the LSP and to develop the harbour.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA: In line with the National Ports Act 2005: The Port is mandated to develop an effective and productive Port industry that is capable of contributing to the economic growth and development of our Country. We do support port city integration, this is managed via the PCC port consultative committee under the chairmanship of the DOT. Refer to Section 81 of the national ports act.</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
<p>1.3.1 Port Revitalisation: There are several examples across the globe of ports that are functioning in economic harmony with the town, where natural assets of the area are used to capitalise on its tourism potential. Examples from other parts of the world show that co-operative governance and shared economic vision for the town, specifically between municipalities and port authorities, have undoubtedly played a determining role in the success of these harbours. For the purpose of this plan, best practise principles from the following local and international harbours have been studied.</p>	<p>TNPA: In line with the National Ports Act 2005: The Port is mandated to develop an effective and productive Port industry that is capable of contributing to the economic growth and development of our Country. We do support port city integration, this is managed via the PCC port consultative committee under the chairmanship of the DOT. Refer to Section 81 of the national ports act.</p> <p>MPBS: This is a statement; no response is required.</p>
<p>1.3.1.1 Principles adopted:</p> <ul style="list-style-type: none"> - Capitalise on natural assets and tourist potential. - Establish linkages between Port and CBD to strengthen the sense of place. - Employ sound urban and architectural design to promote vitality to ensure attraction to tourists. - Preserve tourist experience while promoting safety and efficiency within the port. - Aim for a well-functioning balance between the port activities and the public functions inside port controlled land. - The port to function actively as part of the CBD. 	<p>Cape EAPrac: The commercial fishing industry is an important part of the existing port activities. The proposed plant on Quay 2 has been shown to have limited negative impacts on the environment as per the Draft BAR and as such can form part of the balance of activities as envisaged.</p> <p>MPBS: This is a statement; no response is required. However, it should be noted that the proposed development will aim to retain a well-functioning balance between its operations and other activities in the harbour area.</p> <p>DELplan: Although the Mossel Bay Central Precinct Plan (LSP) indicates that the surrounding areas of the harbour must be developed as a waterfront and ancillary businesses, the LSP did not examine the expansion of the current footprint of the harbour fishing quay. Nonetheless, the LSP states "The ultimate goal of incentives is to induce growth in targeted areas, creating jobs and stimulating construction in stagnant areas while creating long term positive tax revenue." It can be argued that the proposed development directly addresses the needs of the LSP and to develop the harbour.</p>

COMMENT / ISSUES	RESPONSES
<p>1.3.2 Strategies: The planning approach to revitalisation of the CBD needs to be deliberate and structured, not only for the purposes and intent of executing this plan, but also in general. This requires the determination of specific strategic actions or principles that would lead toward achieving growth and revitalisation in the CBD. The precinct plan proposals are based on the following strategic interventions:</p> <ul style="list-style-type: none"> i) Residential Densification: Increase in permanent residents. ii) Maintain Corporate Presence in the CBD. iii) Integrating the port with the CBD. iv) Improvement of vehicular and pedestrian movement systems. v) Improvement of visual and physical permeability. vi) Adding attraction value. 	<p>MPBS: Economic growth is dependent on private sector investment in the local area; Afro-Fishing will make an initial direct investment of R437 million during construction alone, which will add an estimated R162,44 million over and above the initial direct capital expenditure to the economy of Mossel Bay.</p> <p>DELplan: The harbour area has developed and grew with ancillary businesses over the decades. Moreover, businesses, tourism, industries and residential developments have occurred since the harbour was developed. Thus, the expansion of the fishing quay will be desirable for the reason that it will promote an economic injection, it will trigger more businesses to develop in the CBD of Mossel Bay and it will produce job opportunities.</p>

COMMENT / ISSUES	RESPONSES
<p>11-Dec-19</p> <p>1.3.3 Tourism and Attraction Value: Mossel Bay is already a popular tourist destination; both domestic and international tourists enjoy the unique heritage displayed in the area as well as the niche products offered. Although some of the natural assets in the area are used for its tourism potential, there are still others upon which the area has not capitalised on. It has become apparent that a vast majority of residents in Mossel Bay have enjoyed visiting the harbour for various reasons, in years passed when the port was still accessible to members of the public. There is a great plea among residents that public access to the harbour be restored. Although consideration needs to be given to the fact that the need for security in the port have increased over years, consideration should also be given to opening low priority areas for public access.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: This is a statement; no response is required.</p> <p>DELplan: The Port of Mossel Bay was not developed to be a tourist attraction. It was developed for the oil industry and fishing industry. Throughout the TNPA's plans, the Waterfront and the tourist facilities are only a portion of the harbour and the western part of the harbour will remain for fishing industries.</p> <p>Furthermore, the IDP and SDF of Mossel Bay Municipality supports the further development of the already existing industries in the harbour and welcomes the development of the Waterfront on the eastern side.</p> <p>Lastly, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
<p>As this holds a major attraction value that would pull visitors to the port area, where future recreation and tourist development would be established, it can certainly make a great contribution to the success of future developments in the vicinity of the port. Quay 4 is currently the only section of the port where public access is possible and as a starting point, planning needs to be made for expansion of the Quay to allow for: a future marina and mooring facilities for yacht owners; extension of the quay to accommodate shops and restaurants (marine village, likened to Knysna); lookout points and pier for recreational fishing; docking facilities for passenger liners. In addition, key attraction facilities need to be established in the designated inland recreation area, around the port to further serve as points of attraction, which could serve as a catalyst for development of further recreational, entertainment and educational facilities. All these facilities combined should appeal to visitors of all ages</p>	<p>TNPA: We are planning the redevelopment of the Port including expansion to support :</p> <ul style="list-style-type: none"> Oil and Gas Fishing Ship Repair and building Tourism <p>Other economic opportunities are also being identified to create a bigger and better port.</p> <p>MPBS: This is a statement and moreover a proposal for the development of activities within the bounds of the port.</p>

COMMENT / ISSUES	RESPONSES
<p>and cultures.</p>	<p>DELplan: The Port of Mossel Bay was not developed to be a tourist attraction. It was developed for the oil industry and fishing industry. Throughout the TNPA's plans, the Waterfront and the tourist facilities are only a portion of the harbour and the western part of the harbour will remain for fishing industries.</p> <p>Furthermore, the IDP and SDF of Mossel Bay Municipality supports the further development of the already existing industries in the harbour and welcomes the development of the Waterfront on the eastern side.</p> <p>Lastly, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples across the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>
<p>Combine associated recreational facilities with educational value, especially those with a marine theme, within the designated recreational areas to attract tourists and provide a variety of activities within a convenient distance from one another. This would place existing recreational boat trips in proximity to a research facility such as the Shark Lab, currently located at the Point. The grounds in and around the port offers space to expand such facilities to an aquarium and may include also lecture halls or amphitheatres. If designed and planned sensibly, such facilities could integrate the existing facilities at the Posboom heritage site. The attraction value of themed facilities opens possibilities to establish other unrelated recreational facilities relevant to the targeted age groups such as water theme parks.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: This is a statement and moreover a proposal for the development of activities within the bounds of the port.</p>

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	<p>DELplan: The Port of Mossel Bay was not developed to be a tourist attraction. It was developed for the oil industry and fishing industry. Throughout the TNPA's plans, the Waterfront and the tourist facilities are only a portion of the harbour and the western part of the harbour will remain for fishing industries.</p> <p>Furthermore, the IDP and SDF of Mossel Bay Municipality supports the further development of the already existing industries in the harbour and welcomes the development of the Waterfront on the eastern side.</p> <p>Lastly, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p> <hr/> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
<p><u>2. Existing Zoning</u></p> <p>The Port function is defined in the Mossel Bay Integrated Zoning Scheme, 2019, under "Transport Zone 1" with a Primary Use: "Transport Use".</p> <p>"Transport Use":</p> <p><u>Land use description:</u> "transport use" means the use of land, a building or structure for the operation of a service for the transportation of goods (including liquids and gases) or passengers by means of rail, road, sea or pipeline and -</p> <p>(a) includes the use of that land, building or structure for the purpose of a harbour, railway station, bus depot or taxi interchange, and a transport undertaking; and</p> <p>(b) includes public - private undertaking which including a railway station, bus depot, multiple parking garage, taxi rank, public transport interchange, harbour and ancillary purposes, rooftop base telecommunication station and occasional use.</p>	<p>TNPA: To be discussed, with our property and zoning specialist.</p> <p>DELplan: We agree with this statement.</p>

COMMENT / ISSUES	RESPONSES
<p>Development parameters: Development parameters applicable to "business premises" apply.</p> <p>Consent Uses:</p> <ul style="list-style-type: none"> - Air and underground rights - Airfield - Businesses premises - Conference facility - Container site - Helicopter landing pad - Hotel - Industry - Informal trading - Motor repair garage - Restaurant - Service station - Warehouse - Freestanding base telecommunication station 	<p>TNPA: To be discussed, with our property and zoning specialist.</p> <p>DELplan: We agree with this statement.</p>

COMMENT / ISSUES	RESPONSES
<p>It is therefore clear that the zoning of the Port has a primary right to facilitate the transportation of good and since Industry is listed as a Consent Use the primary "transport use" does not include industrial activities as a primary right.</p>	<p>TNPA: To be discussed, with our property and zoning specialist.</p> <p>DELplan: We agree with this statement. The current zoning of Erf 12459, Mossel Bay is Transport Zone I: Transport Use ,however historically, Erf 12459, Mossel Bay always had industrial rights since factories were developed on the subject property over the years. Therefore, the Port of Mossel Bay has Industry rights as consent use that are restricted to their current footprint.</p> <p>Transport Zone I has a secondary right, namely Industry. Thus, we are applying for a consent use application which will expand the current footprint and will only be applicable to that specific part Quay 4 . The rest of the property will remain as Transport Zone I: Transport Use. The definition of Industry explains that the zoning is associated with a factory but that it does not include a noxious trad or risk activity. The Air Quality Impact Assessment explains that the proposed development will not be noxious nor will it be a risk activity.</p>

COMMENT / ISSUES	RESPONSES
<p>Since the port has been used by the fishing industry for many years, the port in some areas has been used for industrial / processing purposes. Industry is defined in the Integrated Zoning Scheme as:</p> <p>"Industry"</p> <p>Land use description: "industry" means a property used as a factory and in which an article or part of the article is made, manufactured, produced, built, assembled, compiled, printed, ornamented, processed, treated, adapted, repaired, renovated, rebuilt, altered, painted (including spray painting), polished, finished, cleaned, dyed, washed, broken up, disassembled, sorted, packed, chilled, frozen or stored in cold storage; including offices, caretaker's quarters, factory shop or other uses that are subservient and ancillary to the use of the property as a factory; and-</p> <p>(a) includes -</p> <ul style="list-style-type: none"> i) an industrial hive; ii) builder's yard; iii) funeral parlour; iv) service station; v) transport usage; vi) rooftop base telecommunication station; vii) freestanding base telecommunication station; viii) warehouse and agricultural industry; ix) storage facility; and <p>(b) does not include a noxious trade or risk activity.</p>	<p>TNPA: To be discussed, with our property and zoning specialist.</p> <p>DELplan: We agree with the statement. However, this is a new expansion for the already existing fish industry footprint. Thus, with the expansion, a new land use application must be submitted to expand the footprint and only the fishing industry footprint must be consent use for Industry.</p> <p>Historically, Erf 12459, Mossel Bay always had industrial rights since factories were developed on the subject property over the years. Therefore, the Port of Mossel Bay has limited Industry rights that are restricted to their current footprints.</p>
<p>With the newly approved Integrated Zoning Scheme 2019, the existing land use rights is interpreted as "Transport Zone I" with a Consent Use for Industry within the existing buildings. An application for Consent to expand the Industrial use footprint will have to be submitted in terms of the Mossel Bay: By-Law on Municipal Land Use Planning, 2015.</p>	<p>DELplan: We agree with this statement.</p>

COMMENT / ISSUES	RESPONSES
<p>Take note that the land use right is NOT Industrial Zone III with a primary right for "Noxious Trade"</p> <p>"noxious trade"</p> <p>Land use description: "noxious trade" means an industry that is offensive, poisonous or a harmful use or activity that, because of the fumes, emissions, smell, vibration, noise, waste products, nature of material used, processes employed, or other cause, is considered by the Municipality to be a source of danger, nuisance or offence to the general public or persons in the surrounding area and includes the following primary land uses which are not regarded as a noxious trade</p> <p>(a) rooftop base telecommunication station; and</p> <p>(b) freestanding base telecommunication station.</p>	<p>TNPA: To be discussed, with our property and zoning specialist.</p> <p>DELplan: We agree with this statement.</p>

COMMENT / ISSUES	RESPONSES
<p><u>3. Comments on the Environmental Process</u></p> <p>The Principles of the Spatial Land Use Management Act which governs land use, is guided by the Mossel Bay Spatial Development Framework 2018 on a Municipal level and the Mossel Bay Central Precinct Local Structure Plan on a local level. Planning Applications decisions must be guided by the vision which is established in the mentioned documents.</p> <p>It is clear from the above-mentioned that the Port with its function and the Mossel Bay Central Business District (CBD) with its function is very important for the Mossel Bay community and future sustainability of the Mossel Bay Area. Both documents, discussed above, propose a future where the Port and CBD is integrated to function as one unit for the benefit of the community. The role that tourism plays in the future Mossel Bay is established in both documents and the important role the Port must play in strengthening the tourism sector in this regard is emphasised.</p> <p>For Tourism to function within the Port and CBD space, a tourism friendly environment must be maintained, which can facilitate the mentioned tourism uses. It is therefore very important to ensure at all costs that the CBD or Port use does not have a negative impact on the tourism trade or sense of place which is necessary for tourism to reach its full potential in Mossel Bay.</p>	<p>Cape EAPrac: Heritage Western Cape has confirmed that the proposed development on the site of an existing derelict / defunct premises will not affect the built landscape. See Annexure E1 of the report.</p> <p>TNPA: Sense of place will not be affected as per presentation done by Afro Fishing.</p> <p>DELplan: The Port of Mossel Bay was not developed to be a tourist attraction. It was developed for the oil industry and fishing industry. Throughout the TNPA's plans, the Waterfront and the tourist facilities are only a portion of the harbour and the western part of the harbour will remain for fishing industries.</p> <p>Furthermore, the IDP and SDF of Mossel Bay Municipality supports the further development of the already existing industries in the harbour and welcomes the development of the Waterfront on the eastern side.</p> <p>Lastly, the Mossel Bay CBD & Harbour Precinct (2013) acknowledges that there are several examples over the globe of harbours that are functioning in economic harmony with the towns, where the natural assets of the area are used to capitalize on its potential. The LSP indicates that the harbour plays a vital role and is a great asset for Mossel Bay. The document mentions that the current harbour must be revitalized and be developed to its fullest.</p>

COMMENT / ISSUES	RESPONSES
<p>The applicant presents a case where minimal impact on the sense of place and tourism potential of the Mossel Bay CBD is envisaged and has gone to great lengths to proof this via specialist investigations / reports as part of the EIA process.</p> <p>Spatially the Mossel Bay Municipality do not support in any way any use that will have a negative impact on the sense of place and existing and future tourism potential of the area. Existing and past generations has put in a lot of effort and constraint to develop Mossel Bay into one of South Africa's top tourist destinations.</p> <p>It is therefore not fair to risk the already established tourism industry with thousands of exciting job opportunities for a new industry which will create 240 job opportunities of which 80 opportunities is directly related to the expansion of the risk activities. The Mossel Bay Municipality is committed to economic growth and job creation but not at the cost of existing job opportunities or potential future opportunities.</p> <p>The study commissioned by the Port to investigate the viability of a Waterfront in the</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: The spatial layout of the Port is of such a nature that no activity other than what already occurs on Quay 4 (fish processing) will be permitted. There appears to be confusion related to a clash of activities and only one could be accepted. This is not the case and creates confusion. The study for the development of a waterfront in the Port clearly does not include the space earmarked for the extension of the Afro Fishing plant.</p>

COMMENT / ISSUES	RESPONSES
<p>port indicated that more than 1000 jobs can be created by developing the tourism industry in the port area.</p>	<p>DELplan: According to Industrial Zone II: Industry definition, a noxious trade development is not supported. The Air Quality Impact Assessment confirms that the proposed expansion of the fish industry will not be noxious. Thus, it will not be necessary to submit a land use application for Industrial Zone III: Noxious Trade.</p> <p>The sense of place will not be disturbed since the proposed development will only expand on the current lease area (the fishing quay). The proposed development will, therefore, compliment the harbour character without any negative impact on the tourist sense of place.</p> <p>Furthermore, the harbour area has developed and grew with ancillary businesses over the decades. Moreover, businesses, tourism, industries and residential developments have occurred since the harbour was developed. Thus, the expansion of the fishing quay will be desirable for the reason that it will promote an economic injection, it will trigger more businesses to develop in the CBD of Mossel Bay and it will produce job opportunities.</p> <p>Francois van Zyl Architects: The Sense of Place can only be affected if there is an offensive odour in the harbour due to the fish meal plant. If extensive scientific research shows negligible smell and AF accepts the responsibility and consequence of any incident, how would any development ever be able to be approved. In other words, AF must understand that the plant can be shut down, if it does not work as envisaged. Again, any waterfront development will only take place to the west of Quay 4, far away from AF, so sense of place does not enter the equation.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA:</p> <p>The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>

COMMENT / ISSUES	RESPONSES
<p>From a Spatial perspective, if the use will have any negative impact on the sense of place or the tourism industry, it is not supported by the Mossel Bay Spatial Development Framework 2018 or the Mossel Bay Central Precinct Local Structure Plan 2013. This will also mean that a rezoning application for a Noxious Trade will have to be submitted that will in principle not be supported by the Mossel Bay Spatial documents.</p>	<p>Cape EAPrac: Heritage Western Cape has confirmed that the proposed development on the site of an existing derelict / defunct premises will not affect the built landscape. See Annexure E1 of the report.</p> <p>TNPA: Sense of place will not be affected as per presentation done by Afro Fishing.</p> <p>DELplan: The sense of place will not be disturbed since the proposed development will only expand on the current lease area (the fishing quay). The proposed development will, therefore, compliment the harbour character without any negative impact on the tourist sense of place.</p> <p>Furthermore, the harbour area has developed and grew with ancillary businesses over the decades. Moreover, businesses, tourism, industries and residential developments have occurred since the harbour was developed. Thus, the expansion of the fishing quay will be desirable for the reason that it will promote an economic injection, it will trigger more businesses to develop in the CBD of Mossel Bay and it will produce job opportunities.</p> <p>Francois van Zyl Architects: The Sense of Place can only be affected if there is an offensive odour in the harbour due to the fish meal plant. If extensive scientific research shows negligible smell and AF accepts the responsibility and consequence of any incident, how would any development ever be able to be approved. In other words, AF must understand that the plant can be shut down, if it does not work as envisaged. Again, any waterfront development will only take place to the west of Quay 4, far away from AF, so sense of place does not enter the equation.</p>

COMMENT / ISSUES	RESPONSES
<p>The proposal and expert supporting documents talks about maximum and minimum acceptable thresholds for air, noise and water pollution. The problem is that the thresholds are not site specific and can be too low or high for the applicable area. It is unfair to expect the Mossel Bay community to be satisfied with a threshold which could be sufficient for other parts of the world but not for Mossel Bay and this risk cannot be transferred from the applicant to the Mossel Bay community.</p>	<p>LAQS: As far as air quality is concerned, air quality standards have been published by the National Government. These standards are specifically aimed at protecting the environment in general, i.e. humans, fauna and flora. The standards are of the lowest in the world (lower than some in the USA) and are based on those published by the World Health Organisation. Therefore, as long as ground-level concentrations are below air quality standards there is no health risk involved. In Afro Fishing's case, the estimated ground-level concentrations of those pollutants for which air quality standards have been published are well below those standards. As far as odour are concerned, different compounds have different odour detection levels, i.e. concentrations where odours can be detected. Odour detection differs from person to person and not country to country. An internet search will show that there is a substantial degree in variation in the reported odour threshold values, for whatever reason. In evaluating the impact of odorous emissions from the proposed fishmeal plant, LAQS made use of the lowest odour detection limits that it could find and found that the estimated ground-level concentrations of emissions will be well below those minimum detection limits.</p> <p>Afro Fishing: It is the detection limits that are important and obviously applicable to all areas. Of importance for this project is not the threshold limit, which obviously must be met, but more the discernible detection limits. If there is no detection then there can be no complaints.</p>
<p>Since the Municipality and both spatial documents support job creation the following can be seen as a mitigating proposal to ensure compliance for the area and economic growth:</p>	
<p>1. All risk must be transferred from the Mossel Bay Community to the applicant and the applicant's investment and operations.</p>	<p>Afro Fishing: Ultimately, Afro Fishing will be the responsible party.</p>

COMMENT / ISSUES	RESPONSES
<p>2. A Noxious Trade is not supported.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>DELplan: According to Industrial Zone II: Industry definition, a noxious trade development is not supported. The Air Quality Impact Assessment confirms that the proposed expansion of the fish industry will not be noxious. Thus, it will not be necessary to submit a land use application for Industrial Zone III: Noxious Trade.</p>
<p>3. No thresholds are used in the post implementation / operational evaluation of the proposed listed activities since it is not site specific.</p>	<p>LAQS: Please see the comments made above. Air quality standards and odour detection thresholds are not area specific, but apply across the board.</p>
<p>4. The following is used to determine whether it is a noxious trade or not: It is considered by the Municipality to be a source of danger, nuisance or offence to the general public or persons in the surrounding area.</p>	<p>LAQS: The proposed fishmeal plant, as planned and described, is none of these. It is not dangerous, will not be a nuisance any more than any other industrial activity in the harbour and will not be offensive in the sense that its impact on the environment, including people, will be offensive. However, some people can never be satisfied and will always find something to complain about, but seem to ignore the existing odours in the area.</p>

COMMENT / ISSUES	RESPONSES
<p>5. If the operation is found to be a noxious trade by the criteria in no 4, the Municipality can immediately (completely or partially) close the operations of the facility / uses / activities applied for.</p>	<p>LAQS: The licensing authority for the proposed process is the Garden Route District Municipality (GRDM) as the operations are included under Section 21 of the NEMA: Air Quality Act, 2004. Therefore, only GRDM has the authority to shut down a process included under Section 21. The Mossel Bay Municipality may and should, of course, lodge a complaint with GRDM if the plant causes a nuisance or becomes offensive.</p>
<p><u>4. Conclusion</u> The existing spatial planning documents only supports uses which will not have any negative impact on the sense of place or the tourism industry in Mossel Bay Town. The applicant presents a case where minimal impact on the sense of place and tourism potential of the Mossel Bay CBD is envisaged. The Mossel Bay Municipality does not support a Noxious Trade in the applicable area. All risk of the use becoming a source of danger, nuisance or offence to the general public or persons in the surrounding area must be transferred to the applicant by a closure condition if the above-mentioned should happen.</p>	<p>LAQS: The procedures that must be followed in deciding whether a process becomes noxious to the point where intervention is required are described in NEMA: Air Quality Act, 2004.</p> <p>DELplan: According to the Industry definition, a noxious trade development is not supported. The Air Quality Impact Assessment confirms that the proposed expansion of the fish industry will not be noxious. Thus, it will not be necessary to submit a land use application for Industrial Zone III: Noxious Trade.</p> <p>The sense of place will not be disturbed since the proposed development will only expand on the current lease area (the fishing quay). The proposed development will, therefore, compliment the harbour character without any negative impact on the tourist sense of place.</p> <p>Furthermore, the harbour area has developed and grew with ancillary businesses over the decades. Moreover, businesses, tourism, industries and residential developments have occurred since the harbour was developed. Thus, the expansion of the fishing quay will be desirable for the reason that it will promote an economic injection, it will trigger more businesses to develop in the CBD of Mossel Bay and it will produce job opportunities.</p>

COMMENT / ISSUES	RESPONSES
<p><u>Waste Management</u></p> <p>The following is required from the Waste Management Section regarding the above-mentioned proposal:</p> <ol style="list-style-type: none"> 1. Noise impact assessment must be done through noise dispersion model. 2. Nuisance management plan must be submitted. 3. Waste management on site must meet the satisfaction of the municipality as well as NEMA:WA. 4. Dust management plan must be submitted for the construction duration. 	<p>Cape EAPrac:</p> <p>As a point of clarity(?) – since the proposed fishmeal plant is not in operation yet, I can only assume that the (noise) complaints you are referring to, relate to existing port operations which will constitute status quo conditions. Under such circumstances a Noise Impact Assessment is generally not a requirement for a proposed activity.</p> <p>With regards to potential noise emanating from the proposed plant, kindly note that all machinery that emits noise that may be considered a nuisance within the harbour, will be housed in soundproof buildings specifically to combat noise pollution and to adhere to applicable noise control regulations. Since this is an acceptable and effective noise mitigation measure, there is no justifiable need for a detailed site specific Noise Impact Assessment on condition that Afro Fishing complies with the Noise Control Regulations. In addition, Afro Fishing will naturally adhere to the outcome of a strategic noise impact assessment for the greater harbour should the ports authority conduct such a study.</p> <p>This office would welcome your response to the design mitigation measure of incorporating soundproof buildings to address potential noise impacts. Should you receive any feedback from the Ports Authority in response to your request for them to conduct a Noise Impact Assessment for the greater harbour, we would really appreciate feedback in order to ensure that any additional measures that may be required, can be incorporated into the environmental process and conditions of approval.</p> <p>Afro Fishing:</p> <p>Correct, detailed Environmental Management Plans will need to be devised for the plant proposed as is the case with the existing cannery.</p> <p>With regards noise pollution, the actual plant will produce less noise compared to the existing cannery. The fish offloading vacuum pumps will however be enclosed in noise insulated buildings.</p>

COMMENT / ISSUES		RESPONSES
<p><u>Environmental Management</u></p> <p>Mossel Bay Municipality strongly supports the comments submitted by the Garden Route Municipality. Of importance is the concerns related to the maintenance of equipment, ensuring staff are skilled enough to operate equipment, ensuring that adequate supplies are on hand to repair faults, ensuring preventative maintenance is done. The limits sets for any discharges to coastal waters must be very carefully considered so that any such discharges to not negatively impact coastal waters.</p>	<p>LAQS: LAQS agrees with this statement and has included a number of essential steps that must be met for the process to be operated successfully and without complaints.</p> <p>Cape EAPrac: This office supports the recommendations provided by the GRDM.</p> <p>Afro Fishing: Skills are important and as already applied in the existing cannery operation and many other processing facilities in South Africa, staff will be suitable qualified and trained.</p>	
<p>Please note that the above comments are based on information provided to the Municipality in the Draft Basic Assessment Report as well as information provided by the developer at public meetings.</p>		
<p>The Municipality is concerned about the negative sentiments towards the proposed development from the general public. The developer must ensure that they adequately deal with these sentiments and mitigate any potential environment effects as the proposed development will be located in a sensitive area of town, not zoned for noxious trade.</p>	<p>Afro Fishing: Unfortunately, a local journalist has embarked on publishing much 'fake' information relating to the application and Afro Fishing. A media campaign will be embarked upon in 2020 to neutralise the perceptions that have arisen due to her smear campaign.</p>	
Mapakati, Sabelo - Private		
Registered as I&AP at public meeting / information session	Registered 20 November 2019	
Marais, Tersia - SMART		
Automatically registered as an I&AP.	Registered 26 February 2019	
Draft Basic Assessment		
<p>S.M.A.R.T (Stranded Marine Animal Rescue Team), as an NPO dealing with the rescue of marine animals on a daily basis, are vehemently opposed to this extension as proposed by Afro Fishing.</p>	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>	
<p>We are extremely concerned about the general impact that the proposed extension noted above on the habitat of our marine mammals, bird-life as well as the fish population in general. Someone needs to raise their voice on behalf of marine life (in this case in our immediate area) – and this is part of S.M.A.R.T.'s mission.</p>		

COMMENT / ISSUES	RESPONSES
We appreciate this opportunity to bring a few matters of concern to your attention with regard to the above:	
Increased fishing activity (by proposed methods) would mean higher incidents of entanglement – something that is already a big problem for our marine mammals;	Afro Fishing: These matters are managed by the Department of Fisheries and fishing vessel permit conditions are very clear as to the allowed fishing practises.
So too would this fishing activity result in a marked decline of natural food resources for our local animals. It is already apparent that there is a decline in the health of our local seal population (more dead animals on beaches, most of them severely malnourished);	Afro Fishing: As noted in several responses the fishing stocks are sustainably management by the Department of Fisheries and the scientific working groups. The seal and penguin stocks are low at the moment due to environmental factors currently at play. These factors are however cyclical and fish stocks increase or decrease depending on food availability, upwelling, currents, water temperatures, etc.
Animals would have to leave the bay in search of food elsewhere – again putting them at risk;	Afro Fishing: As we say in the fishing industry, fish have tails and will migrate (swim) to areas of more food and suitable environmental conditions.
Where are the proposed 1000tons of fish per day going to come from? How can this depletion of natural resources even be contemplated?	Afro Fishing: As noted in several responses the fishing stocks are sustainably management by the Department of Fisheries and the scientific working groups.

COMMENT / ISSUES		RESPONSES
12-Dec-19	<p>We cannot even consider that the pollution aspect be tolerated. The obvious is odour generated by this plant and is not just a mere inconvenience. Second to this but more important is the prospective waste dumping into the sea. How is it even possible for this to be contemplated as being acceptable? A company that can do this has no accountability with regard to the future of our local sea life.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The air quality impact assessment shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant. There seems to be a misconception: No "waste" will be dumped to sea. Seawater will be used for cooling purposes and as scrubbers to reduce odorous emissions associated with the cooling of fishmeal. These odours are associated with dust particles and these collected particles, consisting of high-protein solids, will be returned to sea with the seawater.</p> <p>Afro Fishing: Please read all the environmental reports and impact studies relating to this project. As explained in these reports there will be no odour and waste pollution. Dumping at sea is a criminal offence and the Department of Fisheries has permit conditions and procedures to prevent this.</p>
	<p>Afro fishing are trying to paint a pretty picture of a safe, environmentally friendly, necessary industrial plant with promises of job creation among others. Why would this industry, in the middle of our beautiful town's harbour area, suddenly be such a major success where others such as on the West Coast and in Namibia have failed? It would appear that in depth social impact studies have either not been done or are woefully lacking in sustainability/factors.</p>	<p>Afro Fishing: The other towns have not failed. The fish meal plants continue to operate and contribute to their local economies. There are factories on the west coast that have not had a single odour complaint over the last year.</p>
	<p>We respectfully request that this proposal MUST be shot down and Afro Fishing be prohibited from proceeding as they are proposing nothing less than rape of our natural heritage to boost their coffers.</p>	<p>Afro Fishing: Afro Fishing is not 'raping a natural heritage'. If this was the case Afro Fishing would not have embarked on this authorisation application and its public process. We are being transparent about our intentions and ensuring that every facet of our application and project is within the ambit of the various applicable laws.</p>

COMMENT / ISSUES		RESPONSES
Background Information Document		
26-Feb-19	Discharge into ocean affecting marine life.	<p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility. The implementation of the fishmeal facility is likely to lead to a further improvement in the discharge water, as it will provide an additional mechanism for removing proteins from the water.</p> <p>Afro Fishing: There will be no effluent pollution.</p>
	Depletion of fishing stock - marine animals are suffering of hunger.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There will hence be no overfishing in the bay due to the installation of a new factory.</p>
	As a stranding network we are concerned about the health of our marine life - dolphins, whales, seals, turtles and seabirds and the impact such a factory will have on them.	<p>Cape EAPrac: The TAC ensures the management of fish stocks and allocations in order to provide for feedstocks.</p>

COMMENT / ISSUES		RESPONSES
	Move it away from the ocean and residential areas. It should be in an industrial area.	<p>Cape EAPrac:</p> <p>The choice of location is specific to the industry and the reasons are as follows:</p> <ul style="list-style-type: none"> - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustrya by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.
Maritz, Kobus - SeaVuna Fishing		
	Automatically registered as an I&AP.	Registered 22 February 2019
Martin, Monty - Private		
	Registered as an I&AP.	Registered November 2019
Mattheus, Philip - Greater Mossel Bay Community Safety Forum		
	Registered via email	Registered 25 February 2019
Background Information Document		
	Air emissions to local suburbs.	<p>LAQS:</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES	RESPONSES
Effluent pollution.	<p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: There will be no effluent pollution.</p>

COMMENT / ISSUES		RESPONSES
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">25-Feb-19</p> <p>Congestion in the harbour.</p>	<p>Urban Engineering: Mossel Bay Harbour is a very important and strategic transportation and commercial node within the Southern Cape. In terms of freight volumes, it is currently one of the smallest harbours within the Transnet National Ports Authority's (TNPA) network. The harbour is currently operating at approximately 10% of its capacity in terms of Break Bulk and 20% of capacity in terms of Liquid Bulk. It is expected that the recent finding of oil condensate within the Southern Cape offshore region, will expedite the future long-term planning for Mossel Bay Harbour. Long Terms planning for the harbour includes expanding the harbour's import/export capabilities. The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: The harbour is underutilised currently with Quay 1 actually 100% unutilised at the moment. The busy appearing quay 4 actually only has an occupancy of 30%. Portnet's target is 45%.</p>	

COMMENT / ISSUES	RESPONSES
<p>Greater Mossel Bay Community Safety Forum represents close to 1500 - 2000 people on forums. Most use central area and are dependant on tourism and holiday industry.</p>	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6 that addresses the impact on local tourism and businesses. It is imperative that the sense of place that attracts tourists is not negatively affected. Special attention is thus required to minimise the visual impact and nuisance factors during construction and operations. If the proposed mitigation measures are implemented, there should be very little - if any - impact on tourism.</p> <p>Afro Fishing: We do not expect this to change.</p>
<p>As an alternative use Mossdustria. Heavy industry already located there.</p>	<p>Cape EAPrac: The choice of location is specific to the industry and the reasons are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The plant at Mossdustria has recently had its Air Emissions License (AEL) revoked for non compliance. Afro Fishing was a client of this facility but currently takes its cannery offal to Atlantis.</p> <p>Afro Fishing: The plant in Mossdustria is an offal processor which does not use fish meal and oil processing methods. This plant also has no odour abatement systems installed. As noted above it will be unviable to locate the fish meal plant outside the harbour.</p>

COMMENT / ISSUES		RESPONSES
Mertens, Bert - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Mfeya, Nozithembiso - Afro Fishing employee		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Middleton, Sue - DEFF		
	Automatically registered as I&AP	Registered 21 November 2019
Miller, JS - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		
25-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Miller, CH - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		
25-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Mokone, Tumelo - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Moller, Anna - Private		
	Registered via email	Registered 25 February 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		

COMMENT / ISSUES		RESPONSES
25-Mar-19	I personally do not believe that this is a good thing. What about the smells when the wind blows from that direction. And the pollution.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility. The implementation of the fishmeal facility is likely to lead to a further improvement in the discharge water, as it will provide an additional mechanism for removing proteins from the water.</p>
Monson, Darryl - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
	Thanks again for the opportunity to respond to the proposed project.	

COMMENT / ISSUES	RESPONSES
<p>While I understand and appreciate the importance of creating job opportunities, I think we shouldn't overlook the fact that tourism employs thousands. Every guesthouse needs staff. Almost every guests eats out and takes part in an activity much of which is dependent on our fragile eco system like shark cage diving and whale watching. All the restaurants and activities who employ staff are dependent on tourists.</p>	<p>MPBS: Mossel Bay can't only rely on Tourism to grow the local economy and also needs to grow other sectors. Tourism is seasonal and susceptible to many factors that could impede its growth. The proposed development will contribute to various sectors, including Construction, Agriculture & Fishing, Goods & Services. Tourism is a key industry but so is fish processing, both which are beneficial to the local economy.</p> <p>Afro Fishing: Yes, we agree that tourism is also one of the legs propping up the Mossel Bay economy and must be nurtured along with other industries and sectors. Unfortunately, guest houses do not employ plant operators, engineers, HR personnel, financial personnel, fish packers, quality personnel, IR personnel, union members, IT personnel, advisors, auditors, consultants, etc. Most guesthouses probably do not care about B-BEEE status and therefore do not contribute to enterprise development, social development, skills development and supplier development projects. I will be surprised if all Airbnb, B&B's and guesthouses declare their rental income and pay the taxes due. It is however important to note that project will not impact on the tourism sector as indicated by the impact studies.</p>

	COMMENT / ISSUES	RESPONSES
11-Dec-19	<p>Mossel Bay has suffered the perception of an industrial town not worth visiting. Still today many tourists bypass us. You only need drive past on N2 to not want to stop here from the ugly site of petro SA to Voorbaai and the high rise buildings of Diaz. However, those tourists who do venture in (mostly for one night) are pleasantly surprised by the charm of the old town with its small Harbour and old stone buildings. I have spoken to many of my guests and the shark researchers about the proposed factory and Transnet's plans to extend the harbour. Not one thought that these plans sound any good and possibly threaten both the charm of the old town and our eco system.</p>	<p>MPBS: Industrial development has to be done in a responsible manner. Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p> <p>Afro Fishing: I do agree with your point that MB is perceived as an 'industrial' town. I agree with your sentiment that it would be nice if MB were only a tourist and shark cage diving town. Unfortunately, guesthouses and shark cage diving are not going to employ the masses and will not hold up the Mossel Bay economy. Also there are areas that are specifically zoned for industrial and commercial activity and hence why MB is more a mixed sector economy. MB also has a working harbour which is a state asset and which the state wants to utilise productively.</p>
	<p>There are also a lot of ifs as pointed out by the air quality expert that the factory won't affect us. One being the supply of fresh fish. However the current factory imports its fish from Morocco in order to keep operating. Another that the factory won't operate during peak season in December. However January till March is peak season among our international guests. Many of which return every year as they have learnt to love Mossel Bay.</p>	<p>Afro Fishing: The existing cannery processes both locally caught pilchards plus imported pilchards from Morocco as you state. The proposed fish meal plant will however only process freshly caught anchovy and red-eye herring.</p>
	<p>I also think we should not overlook the fact that a long construction period could deter guests from returning who in the meantime will find another destination to regularly visit.</p>	<p>Afro Fishing: Tourists and guests are not as fickle as we think they are. There are hundreds of other tourist towns in SA with mixed economies that do not lose clientele because there is a factory in the neighbourhood. Most of these guests come from suburbs with mixed economies anyhow.</p>

COMMENT / ISSUES	RESPONSES
<p>In conclusion is it worth risking our growing tourism industry and thousands of jobs with building another factory in the old town. The only part of Mossel Bay which tourists love because it is charming and not industrial. I feel these plans along with the construction period could only perpetuate Mossel Bay's perception of an industrial town. An image the tourism board has worked so hard to change.</p>	<p>Cape EAPrac: The facility is being proposed on the existing abandoned old I&J site inside the fishing precinct of the working Port of Mossel Bay.</p> <p>Afro Fishing: As noted, tourism is not going to die because a factory is developed in a working harbour on the site of a previous factory.</p>
Mostert, Annamarie - Private	
Registered as I&AP	Registered 9 December 2019
Comment submitted to Mossel Bay Municipality	
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.	
<p>Mr Petru Terblanche advised me to submit this correspondence to the Municipality and that it would be passed on to the correct person.</p>	<p>Cape EAPrac: Your submission to the Mossel Bay Municipality has reference. The application for the Afro Fishing facility is currently undergoing an Environmental Impact Assessment.</p> <p>I have registered you as an Interested & Affected Party (I&AP) to ensure that you receive all future correspondence. Your comments as submitted to the municipality will be collated and responses issued in due course.</p> <p>Please feel free to review all the available documentation on our website.</p>
<p>Firstly I would like to note that I submitted a request a month ago by means of a link to Linda Mackay regarding the Impact Study but have not had any response via email.</p>	<p>Cape EAPrac: This office did not receive any initial comments. We appreciate that your comments have made it to us.</p>
<p>I refer to the announcement regarding the proposed Fishmeal facility (AST) in the Port of Mossel Bay at Quay 1. For the record, I would like to state that I am by no means an expert in the development of a factory but am concerned about the impact of this factory on our town.</p>	
<p>My objections are as follows:</p>	

COMMENT / ISSUES	RESPONSES
<p>1. Mossel Bay is a tourism / retirement town and not an industrial town. It also has the smallest harbour as has been pointed out.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p>
<p>2. I do not believe that Mossel Bay has the infrastructure to accommodate such a facility. I just think about the additional traffic that will go to the harbour and back. As well as the inflow of workers by taxi?</p>	<p>Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation.</p>
<p>3. Where will the fish (products) come from? What will be the lifespan of the facility. Our sea life is already being threatened. Experienced and born fisherman (locals and visitors) tell that there is no longer as much fish as there was 15 - 20 years ago. Will fish be provided by Iceland as is what is happening in Namibia? Senior government officials there have resigned and are being charged with corruption.</p>	<p>Afro Fishing: The fish for this factory will be caught by local fishing vessels. The lifespan of the factory will initially be 15 years which is the same as the Port of Mossel Bay lease.</p>
<p>4. The most important is the secretiveness about where the money / investment is coming from? There are just too many unanswered questions. Unfortunately I could not attend the presentation but heard that there were more questions than answers and nobody could give guarantees for the fears of the residents of Mossel Bay. Employment is a priority in our country but it seems that the development of this facility is being surrounded by owners / investors who may be guilty of corruption.</p>	<p>Afro Fishing: There has been no secretiveness regarding the funding. Just because a bad journalist writes articles with false information does not mean this is true. Afro Fishing is currently in discussion with its local bankers regarding project funding. Previous investments that were foreign funded are legally documented at The South African Reserve Bank.</p>
<p>I would like to add my contribution to protecting our town for the next generations. Turning Mossel Bay into an industrial town will certainly not attract tourists.</p>	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>
<p>Mpumela, Johnson - Kwantu Qawula Matyathanga Initiative : 877-177NPO</p>	
<p>Registered via email</p>	<p>Registered 3 March 2019</p>
<p align="center">Background Information Document</p>	

COMMENT / ISSUES		RESPONSES
03-Mar-19	Our organization (KQMI-NPO)key stakeholder would like to register as interested and affected party with the opinion , view to consider or comment on the proposal started on 22 February 2019 , the cut off date 25 March 2019 . I request a summary background information document .	Cape EAPrac: Thank you for your registration and participation.
Mossel Bay Tourism Association		
	Registered by Mattheus Phillip	Registered 25 February 2019
Mossel Bay Golf Estate Homeowners Association		
	Registered by Mattheus Phillip	Registered 25 February 2019
Mpumela, Monde - Kwantu Qawula Matyathanga Initiative : 877-177NPO		
	Registered via email	Registered 3 March 2019
Mpumela, Kholiswa - Kwantu Qawula Matyathanga Initiative : 877-177NPO		
	Registered via email	Registered 3 March 2019
Msipho, Sipiwe - PetroSA (Pty) Ltd		
	Registered via email	Registered 7 August 2019
Background Information Document		
07-Aug-19	I manage operations in the quay 4 and represent PetroSA as an anchor port user therefore making have interest in the process of your EA for your client.	Cape EAPrac: Thank you for your registration and participation.
Myburgh, Pieter - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 29 July 2019
Naidoo, Sedick - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 29 July 2019
Services Report		
01-Nov-19	1, The discussions between your Mnr Danie Wessels and our Mr Eric Louw on 30 October 2019 has reference:	Cape EAPrac: Thank you for your confirmation.
	2. It is herewith confirmed as follows:	
	2.1. Water There is sufficient spare capacity at the Klein Brak River water treatment Works and the water distribution network to supply the proposed development with water.	

COMMENT / ISSUES		RESPONSES
2.2. Sewage There is sufficient spare capacity at the Hartenbos Waste Water Treatment Works and the sewage network to receive the sewage that will be generated by the proposed development.		
Ndembe, Petros - Asla Community Leader		
Registered as I&AP at public meeting / information session		Registered 20 November 2019
Ndlela, Zama - TNPA		
Automatically registered as an I&AP.		Registered 17 July 2019
Neethling, Kobus - Afriforum Mossel Bay		
Automatically registered as an I&AP.		Registered 25 February 2019
Draft Basic Assessment Report		
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>		
1) Although Afro Fishing states that they do not have any fish quotas, other facilities such as Viking have had to lay people off due to lack of quotas in the Mossel Bay area. Which boats or companies does Afro Fishing intend buying fish from in order to process 1000 tons per day?		<p>Afro Fishing: Viking has different quotas and are susceptible to different fish stock cycles. The fishing industry has always been a cyclical industry where good years are followed by low catch years.</p>
2) Concern that the facility will be built and certain deviations will take place from what was presented at the meeting of 20 November.		<p>Cape EAPrac: The design and layout presented at the meeting of the 20th November 2019 is being submitted to the authorities. In the event that they approve the facility, then no deviations may take place without another assessment process being undertaken. There are also various other licenses required such as the Air Emissions License and Building Plan Approvals which will only support the design and specifications as approved by the EIA, if applicable.</p> <p>Afro Fishing: There will be no deviations from what was requested as this would be fraudulent.</p>

COMMENT / ISSUES		RESPONSES
12-Dec-19	3) Afro Fishing must guarantee that there will be no air pollution or pollution of the sea.	<p>Cape EAPrac: There will be very strict conditions placed on the management of odour which must be complied with,, the same applies to the requirements for the Coastal Waters Discharge Permit. Non compliance of permits and licenses will have consequences to the facility.</p> <p>Afro Fishing: Afro Fishing will comply with all permit conditions in this regard.</p>
	4) Transport of personnel to and from the facility must be in such a way that there is a minimum of impact to the neighbouring residential properties. For example contracts with minibus taxis or Afro Fishing's own transport must collect and drop off personnel at the facility and not in the residential areas outside of the facility.	<p>Afro Fishing: Afro Fishing does its best to ensure that contractors do not impact on the neighbourhood.</p>
	5) Local labour must be used for production line personnel, particularly people that have been laid off from the fishing industry. No labour should be brought in from other towns. The use of local labour will minimise security problems.	<p>Afro Fishing: It is Afro Fishing's policy to support local wherever we can. Even our B-BEEE expenditure is focussed locally. We also aim to use as many local companies as possible during the construction phase.</p>
	6) A Monitoring Forum must be established which should include the following: Civil Rights Organisations, Municipality, independent Environmental specialist, homeowners association (ratepayers association), tourism body, estate agents, TNPA, Afro Fishing representative (not management, CEO or directors), any other interested parties.	<p>Cape EAPrac: We strongly support the establishment of a Monitoring Forum, as does the Socio-Economic specialist. We have requested that this is made a condition of any authorisation, if issue.</p> <p>MPBS: Forms part of crafting and implementing a monitoring and evaluation plan achieved through consensus among stakeholders.</p> <p>Afro Fishing: When I was working in Hout Bay we had such a forum. It is the aim not to be a nuisance where such a forum is needed but if a forum is requested Afro Fishing will participate.</p>

COMMENT / ISSUES	RESPONSES
<p>Objective of the Forum: The forum must visit the facility during the construction period once the building is complete to ensure that the equipment installed is the same as per the proposal and any authorizations. Once the facility is operational, the Forum should visit during production to ensure that all processes are being followed and that the equipment (RTO and extractors) are functioning correctly.</p>	<p>Cape EAPrac: The Monitoring Forum must include a constitution that provides the objectives, goals and responsibilities of the group along with procedures and protocols for dealing with any incidents.</p> <p>MPBS: Forms part of crafting and implementing a monitoring and evaluation plan achieved through consensus among stakeholders.</p> <p>Afro Fishing: It will be fair process for Afro Fishing to prove that it built the factory according to what was promised and that the equipment functions correctly.</p>
<p>Authority of the Forum: The Forum must have the authority to compel the management of Afro Fishing to immediately implement any corrective actions in the event that there is any malfunction of the facility, or any upset conditions or pollution occurs. Furthermore the Forum must be able to request a shut down of the facility in the event that the corrective actions cannot be implemented.</p>	<p>Cape EAPrac: The Monitoring Forum must include a constitution that provides the objectives, goals and responsibilities of the group along with procedures and protocols for dealing with any incidents.</p> <p>MPBS: Forms part of crafting and implementing a monitoring and evaluation plan achieved through consensus among stakeholders.</p> <p>Afro Fishing: I am in agreement with the above.</p>
Background Information Document	
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	

	COMMENT / ISSUES	RESPONSES
25-Feb-19	<p>As a result of Afro Fishing's existing fish facility that smells from time to time there is no need for further nuisance odours in the CBD. It already affects tourism that is important to the economy of Mossel Bay.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular sections 8.3.6 and 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on tourism and property values.</p>
	<p>I own a business near the harbour and belong to Afriforum which protects the rights of citizens. The BID refers to the creation of jobs but what about the loss of jobs to the bad odours.</p>	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6, which addresses the impact on local tourism and businesses. If the proposed mitigation measures are implemented, there should be very little (if any) negative impact on local businesses. On the contrary, local businesses could benefit from the increased demand for goods and services, both during construction and operations.</p>

COMMENT / ISSUES	RESPONSES
<p>There is a current facility in Mossdustrya, possible alternative location.</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustrya by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The harbour precinct provides for operational fishing industries and as such is not a residential area.</p>
Nel, Elize - Mossel Bay Municipality	
Automatically registered as an I&AP.	Registered 29 July 2019
Nel, Annatjie - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Nel, Pieter - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Nel, Catinka- Private	
Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document	

COMMENT / ISSUES		RESPONSES
25-Mar-19	Overfishing in our bay.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There will hence be no overfishing in the bay due to the installation of a new factory.</p>
	The effect of smelling in town.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
Nilsson, Wendy - Private		
	Registered as I&AP	Registered 2 December 2019
Draft Basic Assessment		

COMMENT / ISSUES		RESPONSES
02-Dec-19	I hereby lodge my protest regarding the proposed fish factory.	
Njajula, Tandiwe - DEA Oceans & Coasts		
	Automatically registered as an I&AP.	Registered 22 February 2019
Oliver, Brian - Private		
	Registered via email	Registered 26 February 2019
Olivier, Mart- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		
25-Mar-19	The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: No stikwater will be released to the sea.</p>

COMMENT / ISSUES		RESPONSES
	Concern regarding the double standards in the municipality.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p>
Olivier, Trudie- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
25-Mar-19	Overfishing in our bay.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There will hence be no overfishing in the bay due to the installation of a new factory.</p>
	The effect of smell in the centre of Mossel Bay towards the tourism industry as well as the local businesses.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>

COMMENT / ISSUES		RESPONSES
Olivier, Rudi - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
25-Mar-19	Changes in coastal discharge permit - possible increase in pollution	<p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility.</p> <p>Afro Fishing: The added discharge will be for water used for condensation. There are no pollutants in this water and it does not come into contact with any fish or processed fish.</p>
	The effect of smell in the centre of Mossel Bay towards the tourism industry as well as the local businesses.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
Otto, Johan - Private		
	Registered via email	Registered 11 December 2019
Draft Basic Assessment		

COMMENT / ISSUES		RESPONSES
12-Dec-19	The above mentioned project came under my attention only recently.	<p>Cape EAPrac: Please note that this proposal has been advertised and circulated to the public since February 2019. The comment period on the Draft Basic Assessment Report of 12 November to 12 December is part of the legislated timeframes provided by the NEMA EIA Regulations. The application process follows prescribed statutory timeframes based on the proposal presented.</p>
	As a home owner and Air B+B business partner in close vicinity of the proposed location I am strongly oppose to this project.	<p>Cape EAPrac: So noted.</p>
	I firmly believe that the impact that such a project will have on the environment namely increase noise pollution, traffic, infra structure, stench and not to mention tourism will have far reached repercussions.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Afro Fishing: The application and impact studies have clearly indicated how these issues will be mitigated. This is a modern facility using 'best proven' technology and practises with the purpose of not being a nuisance or affecting the tourism industry.</p>
	Our beloved Town of Mossel Bay will never be the same if this project is approved... I am strongly oppose to this!	<p>Cape EAPrac: So noted.</p>
I want to voice my concern as part time resident and vacation goer at Mosselbaai to the prospects of commercial fishing operations in the area.		

COMMENT / ISSUES		RESPONSES
11-Dec-19	I think this is an ill advised decision as no impact studies have been done to consider the effects it will have on the ecosystem. As Mosselbaai is rich in biodiversity and its residents relies heavily on tourism (especially in holidays), I know it will negatively impact the sea life as well as residents that relies on it.	Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted.
	Mosselbaai already generate great revenue from offshore oil drilling as well as tourism and when commercial fishing takes place it will greatly degrade the area and disturb its beauty.	MPBS: This is a statement and no response is required. Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.
	I hope my response will help slow the process until further studies have been conducted to ensure that all the impacts are considered.	Cape EAPrac: Thank you for your participation in this EIA process.
Otto, Marina - Private		
	Registered via email	Registered 12 December 2019
Draft Basic Assessment		
12-Dec-19	This is to express my strong feelings AGAINST the build of a fish factory that will benefit a few people but will destroy the surrounding ocean life and Mossel Bay. I am sure you are well aware of all the negatives.	Cape EAPrac: Thank you very much for your email. I have registered you as an Interested & Affected Party (I&AP) for the Environmental Impact Assessment process. This will ensure that you receive all future correspondence relating to this application.
	I hope this insanity will be stopped.	All comments are being collated and responses will be provided in due course. The updated Comments & Responses table will be circulated to all registered I&APs early in the new year. Please feel free to review all available documentation on the website link.
Page, Marius - Private		
	Registered via email	Registered 7 June 2019
Pauw, Christiaan - Private		
	Registered via email	Registered 26 February 2019
Pauw, Jeanette - Private		

COMMENT / ISSUES		RESPONSES
	Registered via email	Registered 26 February 2019
Pejn, Lesley - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Pheeha, Saasa - DAFF Fisheries Management		
	Automatically registered as I&AP	Registered 10 November 2019
Pillay, Jay - Private		
	Registered as I&AP	Registered 12 December 2019
Pillay, Nathan - Private		
	Registered as I&AP	Registered 12 December 2019
Draft Basic Assessment		
	<p>Both me and my wife Jay object to the establishment of the fishmeal factory This is based on the following Increased Heavy Vehicle traffic ; Increased noise levels from Trucks and additional Fishing Boats to bring in a 1000 tons of fish per day.</p> <p>No proper access roads No safe parking for Trucks in Mosselbay.</p>	<p>Afro Fishing: Please note the contents of the Traffic Impact Study which shows a LOW impact. The truck activity will also always be onsite. Trucks will be loaded and offloaded on company premises.</p> <p>There will be no increase in noise levels as vacuum pumps will be insulated. The noise levels will be less than that of the existing cannery.</p> <p>Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation. Ample truck parking is provided on site.</p>

COMMENT / ISSUES		RESPONSES
12-Dec-19	<p>Increased air pollution The EIA report is based on assumptions as no actual airflow tests were done !!!</p>	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create a worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>
	<p>We will be changing the annual tourists away from the caravan parks. We will be doing ourselves a disservice to both local and overseas tourism.</p>	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

COMMENT / ISSUES	RESPONSES
<p>The residents around the harbour will be impacted by both the noise and smell levels Sleeping and leisure patterns will be altered due to the noise levels if factory is run 24/7/365.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Afro Fishing: If sleeping patterns are not currently affected then they certainly will not be affected by the new plant. In fact, most of the boat activity and offloading will occur during daytime hours.</p>
Pinto, Adele - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment	

COMMENT / ISSUES	RESPONSES
<p>The property market will decrease cause of smell and constant noise.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Afro Fishing: This has not been the situation in other coastal towns that have fish meal plants. International trends have also shown developed first world towns to have fish meal plants which do not impact on the property market. What has shown to impact the property market is when unemployment is high (e.g.. Hout Bay) and crime, riots and other illegal activity start increasing.</p>
<p>We would not be considered as a holiday destination any longer. We will go from the best town of the year to a no town that will become a ghost town with no time at all.</p>	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>
<p>Our air will get polluted.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p>

COMMENT / ISSUES		RESPONSES
12-Dec-19	Our roads will deteriorate because of all the trucks going in and out of the harbour, the leaking fish water, smell, smell, smell and our economy will go down.	<p>Afro Fishing: Please note that no fish will be transported for the fish meal plant so there will be no leaking trucks, etc. Fresh fish will be offloaded via trawlers in the harbour. The odour will be controlled using 'best proven' odour abatement measures as was presented at the public participation meeting.</p> <p>Urban Engineering A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>
	A waterfront development will be much better and attract more tourists into Mossel Bay and it will create much more work than this project above. Afro Fishing Fishmeal and Oil Reduction Facility, as it only creates work for 200 people.	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>MPBS: Mossel Bay can't only rely on Tourism to grow the local economy and also needs to grow other sectors. Tourism is seasonal and susceptible to many factors that could impede its growth. The proposed development will contribute to various sectors, including Construction, Agriculture & Fishing, Goods & Services. Tourism is a key industry but so is fish processing, both which are beneficial to the local economy.</p>

COMMENT / ISSUES	RESPONSES
	<p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development.</p> <p>The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
Pistorius, Ferdie - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Plaku, Sandiswa - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Platjies, A - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Ploog, Otto- Private	
Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document	
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.	

COMMENT / ISSUES	RESPONSES
<p>Pollution of the sea from the stickwater produced by Afro Fishing, including pollution around the harbour.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: No stikwater will be released to the sea.</p>
<p>The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.</p>	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: If there are irregularities they must certainly be investigated. AF will ensure compliance with all regulations and licensing conditions.</p>

	COMMENT / ISSUES	RESPONSES
25-Mar-19	<p>Concern regarding the pollution effect on Mossel Bay, the environment, the sea life as well as residents and visitors. What effect will pollution have on the environment and the sea?</p>	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p> <hr/> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES		RESPONSES
	Attracting of flies to the CBD as well as bad odours affecting the town and tourism.	<p>LAQS: Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6, which addresses the impact on local tourism and businesses. If the proposed mitigation measures are implemented, there should be very little (if any) negative impact on local businesses. On the contrary, local businesses could benefit from the increased demand for goods and services, both during construction and operations.</p> <p>Afro Fishing: Flies have not been an issue in other towns where there are fish meal plants. For your interest AF does already have pest and rodent control measures in place. Service companies like Rentokill and Initial Hygiene already have service agreements with AF to control these factors.</p>
Potgieter, Gerhard - Private		
	Registered via email	Registered 18 March 2019
Background Information Document		
18-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Potgieter, Henriette - Private		

COMMENT / ISSUES	RESPONSES
Registered via email	Registered 25 March 2019
Background Information Document	
	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Afro Fishing: Odour management has been explained. With regards the heavy traffic. The precinct planning already allows for this. Eventually when the Port of Mossel Bay is enlarged and has its own container loading capability there will be no need to transport fish meal or fish oil via road.</p>

COMMENT / ISSUES	RESPONSES
<p>Extremely unpleasant odours and additional heavy traffic to and from the harbour.</p>	<p>Urban Engineering: Mossel Bay Harbour is a very important and strategic transportation and commercial node within the Southern Cape. In terms of freight volumes, it is currently one of the smallest harbours within the Transnet National Ports Authority's (TNPA) network. The harbour is currently operating at approximately 10% of its capacity in terms of Break Bulk and 20% of capacity in terms of Liquid Bulk.</p> <p>It is expected that the recent finding of oil condensate within the Southern Cape offshore region, will expedite the future long-term planning for Mossel Bay Harbour. Long Terms planning for the harbour includes expanding the harbour's import/export capabilities.</p> <p>The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network.</p> <p>The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p>

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 236 91 360">25-Mar-19</p> <p data-bbox="114 571 1043 639">We have a property in Hout Bay too and the unpleasant odours from the fishmeal factory is unbearable / horrible.</p>	<p data-bbox="1099 260 1171 284">LAQS:</p> <p data-bbox="1099 296 2152 400">The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p data-bbox="1099 443 2168 807">The odour abatement technology that will be used has two key components. Firstly, a custom-designed extraction system extracts air from each part of the process for thermal treatment in the RTO system. This system has been proven to be successful in the destruction of all odorous emissions from fishmeal plants. If the relevant company in Hout Bay were to use the same technology, all odorous emissions will disappear from the site. The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p data-bbox="1099 850 1245 874">Afro Fishing:</p> <p data-bbox="1099 887 2159 954">Hout Bay does not have an RTO unit to oxidize odours. Even without an RTO unit, the number of days per annum that fish meal odours can be smelled in Hout Bay are very few.</p>
<p data-bbox="114 1118 1081 1254">I am a resident too in the area and my residence is located 800m from fish oil and fishmeal factory and 200m from propose fishmeal warehouse. Unpleasant odours, noise and other pollutants as well as additional traffic will have a direct impact on me and my family's health.</p>	<p data-bbox="1099 1062 1256 1086">Cape EAPrac:</p> <p data-bbox="1099 1099 1704 1123">See responses above relating to air quality and traffic.</p> <p data-bbox="1099 1174 1245 1198">Afro Fishing:</p> <p data-bbox="1099 1211 2145 1315">All these impacts will be within allowable tolerances otherwise authorisation will not be granted to proceed with this project. There will therefore be no direct impact on you or your family's health.</p>

COMMENT / ISSUES		RESPONSES
	This venture should be established in an industrial area away from residential and business or tourist areas. The proposed fish meal factory has not yet been established and an alternative can be determined.	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustryia by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: There are fish meal plants in Hout Bay, Cape Town Waterfront, St Helena Bay and many coastal and tourist towns throughout the world. These facilities are integrated into their environments and contribute to their local economies. Fishing activities of this nature need to be located in fishing harbours.</p>
Pretorius, Michelle - DEFF		
	Automatically registered	Registered 3 December 2019
Draft Basic Assessment		
03-Dec-19	The Branch Fisheries: Directorate Sustainable Aquaculture Management has reviewed the EIA documents for the proposed project and there are no comments to be submitted from an aquaculture perspective. However my Fisheries colleagues from other Directorates may still submit comments with regards to their respective mandates.	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>
Proudfoot, Willie- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
25-Mar-19	Local and district municipality - possible double standards.	No detail supplied to substantiate this allegation.
	Cares about the possible pollution effect the industry can have on the environment, sea, local people and guests.	See above

COMMENT / ISSUES		RESPONSES
Proudfoot, Mandi- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		
25-Mar-19	Possible irregularities by state officials who issue licenses should be investigated.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: No detail supplied to substantiate this allegation.</p>
	Attracting of flies to the CBD.	<p>Afro Fishing: There will be no increase in fly activity in the CBD due to this project. Afro Fishing already contracts pest control and hygiene companies to control these issues. This is standard practise in any food or manufacturing environment.</p>
Proudfoot, Willem- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		

COMMENT / ISSUES		RESPONSES
25-Mar-19	The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: The issuing of the permit is precisely to regulate and control discharges to the sea. It is therefore not an irregularity if the activity is regulated in this way.</p>
	Concerned about double standards in the municipality.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: No detail supplied to substantiate this allegation.</p>
Puren, Colin - Mossel Bay Municipality		
	Registered as I&AP	Registered 25 July 2019
Puren, Susan - Maroela Media		
	Registered via email	Registered 25 July 2019
Pyper, Francois - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES		RESPONSES
25-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.
Rhayimani, Nokinanda - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Rice, Don - Private		
	Registered via email	Registered 25 February 2019
Roberts, John - DJ de Waal cc		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
	No Marine Impact Study has been done.	<p>Cape EAPrac:</p> <p>No, no Marine Impact Assessment has been undertaken for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p>

COMMENT / ISSUES	RESPONSES
<p>Water and air pollution.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p>

COMMENT / ISSUES	RESPONSES
<p>11-Dec-19</p> <p>Mossel Bay's economy is mainly focussed on tourism. Bad odours will have a negative impact on tourism and property values.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community. LAQS wishes to point out that a fishmeal factory is located at Cape Town's waterfront, a substantially grater tourist attraction than Mossel Bay. This factory does not use RTO technology, but relies on chemical scrubbers which are less efficient that RTOs. No odorous complaints arise from the plant in Cape Town because it only processes fresh fish, a key requirement in Afro Fishing's business plan.</p> <p>MPBS: that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>
<p>1000 tons of fish needed every day, how many tons will be delivered by road? Access road to harbour is not suitable for heavy traffic.</p>	<p>Afro Fishing: Zero tons will be delivered by road. There is a LOW traffic impact anticipated. All raw fish will be delivered by boat directly into the factory. 1000 tons will at most produce 250 tons of product. If 30,000 tons of raw fish is processed annually this will translate to one truck per day.</p> <p>Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation and traffic distribution.</p>

COMMENT / ISSUES	RESPONSES
<p>The above cc owns a block of flats in the CBD of Mossel Bay and the factory will have a negative impact on the value of the property. The property is situated at 65 High Street and is about 900m from the proposed factory site as the crow flies.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community</p> <p>MPBS: that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

COMMENT / ISSUES	RESPONSES
<p>The facility should be built in the industrial area of Mossel Bay or be relocated where there is fish in abundance. The harbour area should be developed around tourism.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
<p>The property owners and business owners, must be kept up to date on all relevant matters regarding this facility via the media.</p>	<p>Cape EAPrac: As a registered I&AP you will receive all correspondence related to this application.</p>
<p>Roberts, John - W&S Boere</p>	
<p>Registered as I&AP at public meeting / information session</p>	<p>Registered 20 November 2019</p>
<p style="text-align: center;">Draft Basic Assessment</p>	

COMMENT / ISSUES	RESPONSES
<p>Bad odours, air and water pollution.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
<p>Negative effect on tourism and property values</p>	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

	COMMENT / ISSUES	RESPONSES
12-Dec-19	No Marine Impact Study has been done.	<p>Cape EAPrac: No, no Marine Impact Assessment has been undertaken for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p>
	Access road to harbour not suitable for heavy traffic (1000 tons per day!)	<p>Afro Fishing: Zero tons will be delivered by road. There is a LOW traffic impact anticipated. All raw fish will be delivered by boat directly into the factory. 1000 tons will at most produce 250 tons of product. If 30,000 tons of raw fish is processed annually this will translate to one truck per day.</p> <p>Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation and traffic distribution.</p>

COMMENT / ISSUES	RESPONSES
<p>Impact on potable water, how may KI will be used per day?</p>	<p>Cape EAPrac: A Services Report was included as Annexure G6 of the Basic Assessment Report.</p> <p>Based on the requirements provided by Afro Fishing, it is estimated that the fresh water demand that will be required for process- and domestic usage are as follows:</p> <p>i) During production:</p> <p>a) Plant - 290 kℓ/ day b) Cleaning purposes one to three times per week - 50 kℓ per cleaning c) Max. daily demand - 340 kℓ/day - 3,94 ℓ/s</p> <p>Potable water is supplied to the existing Afro Fishing facility and was supplied to the old I&J facilities via existing connections to the Municipal network in Bland Street. (See Annexure A). No upgrade of these connections are envisaged.</p> <p>The Mossel Bay Municipality confirmed that enough water is available in their existing water system.</p>
<p>The above cc owns property in Rodger Street, Erf 9290, 63 Rodger Street. The value of the property will be negatively affected by this facility.</p>	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

COMMENT / ISSUES	RESPONSES
<p>The facility should be built in the industrial area of Mossel Bay or be relocated where there is fish in abundance. The harbour area should be developed around tourism.</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
<p>The property owners and business owners, must be kept up to date on all relevant matters regarding this facility via the media.</p>	<p>Cape EAPrac: As a registered I&AP you will receive all correspondence related to this application.</p>
Roux, Peggy - Heiderand Neighbourhood Watch	
Registered via email	Registered 4 March 2019
Roux, Jaco - Mossel Bay Municipality	
Automatically registered as I&AP	Registered 22 February 2019
Roux, Willem - Former Port Manager	

COMMENT / ISSUES	RESPONSES
Registered via email	Registered 6 December 2019
Draft Basic Assessment	
Your draft Basic Assessment for Afro Fishing's Fishmeal and Fish Oil Reduction Facility ref. MOS569/08 dated 11 November 2019 refers.	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>
As a former Port Manager of the Port of Mossel Bay and being integral in the process of supporting the establishment of the Afro Fishing processing facility at the Port of Mossel Bay I have an in-depth understanding of the Afro Fishing facility and the Port.	<p>Cape EAPrac: Your experience and expertise in this matter is greatly appreciated.</p>
<p>It is essential to understand the Port of Mossel Bay as a point of departure as each South African commercial port differ in its strategic contribution to the South African economy, target market, cargo clusters, rail corridor and value add to the local economy. Be mindful that ports are the gateways of the economy and handle more than 90% of cargo imported and exported.</p> <p>The Port of Mossel Bay serve the petroleum industry, fishing industry and to a minor extent the tourism sector (in the mentioned sequence).</p>	<p>Cape EAPrac: The current management of the Port of Mossel Bay have confirmed that this approach remains part of their long term planning.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams: 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development</p> <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p>
Afro Fishing has a sound reputation in the seasonal pelagic fish sector. Although I recall dealing with minor non-compliance environmental issues, the company in general made a concerted effort to be a responsible corporate citizen pertaining to the environment.	<p>Afro Fishing: Thank you! It is our aim to be fully compliant w.r.t. all environmental matters, to have minimal impact on the environment and to not be a 'nuisance' neighbour.</p>

COMMENT / ISSUES		RESPONSES
06-Dec-19	<p>With specific reference to the proposal I wish to comment as follows:</p> <ul style="list-style-type: none"> • AEL conditions and the manner in which these will be monitored must be set out in detail (i.e. how and where will measurements be taken, how often will these measurements be taken, ensuring the independence of the company taking the measurements) 	<p>Cape EAPrac: The licensing conditions associated with such a development will be very strict and the licensing authority has the right to retract the license if the applicant does not comply. In addition, Air Emissions Licenses have to be renewed every five years and submit monitoring data on a regular basis. Thus should the project go ahead, any "promises" (commitments) made by the applicant will be legally binding and cannot be ignored.</p> <p>Afro Fishing: I am sure the AEL license conditions will be stringent. Afro Fishing will be compelled to meet these conditions and will use independent companies to take measurements and grab samples as needed.</p>
	<ul style="list-style-type: none"> • Discharge of contaminated water into the sea must not be allowed. All run-off water used during the washing of the facility must be collected. If water used at the facility is discharged into the sea it must be into "white water". Any water discharged must be scrubbed to comply with legal standards prior to being discharged to avoid any contamination. Details of how the quality of the sea water will be sampled and monitored must be set out in detail (i.e. how and where will measurements be taken, how often will these measurements be taken, ensuring the independence of the company taking the measurements) 	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p>

COMMENT / ISSUES		RESPONSES
<ul style="list-style-type: none"> • Trucks loading processed product at the Port must not be allowed to leave the facility if any run-off from the truck is not channelled to a slop tank fitted to the truck. 	<p>Cape EAPrac: This office supports this recommendation in the event that "wet" material is every transported.</p> <p>Afro Fishing: The fish meal and oil product will be sealed in shipping containers. There will be no leakage and slop from trucks.</p>	
<ul style="list-style-type: none"> • Maximizing and adding value to the complete source (fish) whereby waste product is minimised is a sound principle – a target of zero “dumping” should be the aim. This facility certainly aims to beneficiate and add value to the by-products of the pelagic fish cannery. In accordance with the principle of maximising a natural resource I support the establishment of this facility. 	<p>Cape EAPrac: Thank you for your input.</p> <p>Afro Fishing: Thank you!</p>	
<ul style="list-style-type: none"> • The aforesaid principle requires of a community benefitting from a resource to accept the “bitter and sweet” thereof (why dump the unwanted bits at someone else’s front door). 		
Rudman, Nettie- Private		
Registered by Marelize Kapp	Registered 25 March 2019	
Background Information Document		
Local and district municipality - possible double pollution (sic).	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: No detail supplied to substantiate this allegation.</p>	

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 612 91 735">25-Mar-19</p> <p data-bbox="114 788 1066 855">Cares about the possible pollution effect the industry can have on the environment, sea, local people and guests.</p>	<p data-bbox="1099 245 1256 272">Cape EAPrac:</p> <p data-bbox="1099 284 2130 384">Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p data-bbox="1099 432 2163 608">Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p data-bbox="1099 655 1249 683">Afro Fishing:</p> <p data-bbox="1099 694 2163 975">An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons. Afro Fishing has recently embarked on acquiring ISO22000 (a food safety management system to help improve overall performance in food safety). AF is therefore striving towards consistent safe practises and products, and a way to address risks and to conform to food safety management systems. This same approach will be applied to environmental risks that need to be managed.</p>

COMMENT / ISSUES		RESPONSES
		<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
Rudman, Rudie- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
	NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.	
25-Mar-19	Pollution of the sea from the stickwater produced by Afro Fishing, including pollution around the harbour.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: There will be no stikwater discharges into the sea or environment. All stikwater will be processed.</p>

COMMENT / ISSUES		RESPONSES
	Attracting of flies to the CBD.	Afro Fishing: There will be no increase in fly activity in the CBD due to this project. Afro Fishing already contracts pest control and hygiene companies to control these issues. This is standard practise in any food or manufacturing environment.
Rysberben, J - St Blaize Homeowners Association		
	Registered as an I&AP.	Registered 28 November 2019
Draft Basic Assessment		
28-Nov-19	Please note herewith our intention to raise concerns from the Committee of the St Blaize Home Owners Association - approved representatives for the Home Owners of the St Blaize Townhouse complex in Bruns Road, Mossel Bay - against the establishment of the proposed Afro Fishing Fishmeal and Fish Oil Reduction facility on the Mossel Bay Harbour.	Cape EAPrac: Thank you for your participation in this EIA process. We await your submission.
	The Committee will submit its comments and opinion on the contents of the Draft Basic Assessment Report (DBAR) as well as on the Comments and Responses Report for the proposed fishmeal facility, to the same address, per electronic mail, before 12 December 2019.	
Sampson, Leverne - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Schoeman, Johan - Garden Route District Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Draft Basic Assessment		
	Thank you for the opportunity to comment on the Draft Basic Assessment Report (Draft BAR) for the proposed Afro Fishing (Pty) Ltd Fishmeal and Fish Oil Reduction Facility at Quay 2, Mossel Bay Port. It is also confirmed that the Garden Route District Municipality (GRDM) is the competent authority for Licensing of Listed Activities in terms of Section 21 of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004). As correctly mentioned, the proposal activity triggers activity 34 of NEMA Listing Notice one (R327) as well as Category 10 of NEM:AQA (GN 893).	

COMMENT / ISSUES	RESPONSES
<p>The two application processes therefore runs parallel with each other with only one public participation process. Our comments will focus specifically on Air Quality matter, as this is our competency in terms of the NEM:AQA, the National Framework for Air Quality in South Africa and the GRDM 3rd Generation Air Quality Management Plan (AQMP). My colleagues from Municipal Health will also comment in terms of their Municipal Health competency.</p>	<p>Cape EAPrac: So noted.</p>
<p>When considering an application for an atmospheric emission license (AEL), the licensing authority (LA) must take into account all relevant matters, including nine specific factors as outlined in Section 39 of NEM:AQA. For the purpose of this letter, our comments are structured, and the specialist reports evaluated, against the nine Section 39 factors in order to verify compliance with the requirements of the NEM:AQA.</p>	<p>Cape EAPrac: So noted.</p>
<p>It must be emphasised that this comments in terms of the sec 39 requirement is used for guidance for commenting during the EIA process and the licensing authority must still decide the application within 60 days of the date on which the decision on the application for the environmental authorisation has been made.</p>	<p>Cape EAPrac: So noted.</p>
<p>Section 39 Factors:</p>	
<p>(a) any applicable minimum emission standards set for ambient air and point source emissions that have been determined in terms of the NEM:AQA.</p>	
<p>The applicant must comply with the following emission limits from its respective stacks. For the proposed activity, the following emission limits will apply:</p>	

COMMENT / ISSUES	RESPONSES
<p>Boiler Stacks: (Controlled emitter S23)</p> <p>PS1 - Boiler Stack 1 - (Liquid fuel fired boilers) PM - 100mg/Nm³ SO₂ - 500mg/Nm³</p> <p>PS2 - Boiler Stack 2 - (Liquid fuel fired boilers) PM - 100mg/Nm³ SO₂ - 500mg/Nm³</p> <p>The proposed stack heights must be a minimum of 15m in order to align with the input data used for the air dispersion modelling. If the specialist recommend higher stack heights, the higher height must be imposed. The visual impact of the stacks must be taken into consideration, especially taking into account black smoke emissions during plant start-up, plant upsets and shutdown processes. The periods in the Controlled Emitter Regulations for allowable black smoke emissions will apply to all the stacks at the Afro Fishing plant. Stack testing must be conducted and emission reports submitted at least once per annum in terms of the Controlled Emitter regulations, and not biennially as indicated in the specialist report and the Draft BAR. This must be corrected.</p>	<p>LAQS: LAQS agrees with these requirements. As far as LAQS knows the final configuration of the plant has not yet been finalised and the incorporation of stacks, e.g. all boiler emissions via a single stack instead of three separate units, is being investigated. Black smoke from boiler stacks indicate poor combustion conditions are usually prevalent during the oil-fired boiler start-up. The use of gas instead of oil is also being investigated.</p>

COMMENT / ISSUES	RESPONSES
<p>PS3 - RTO stack</p> <p>The RTO stack must comply with the requirements of S23 Gaseous fuel-fired small boilers - using natural gas and liquefied petroleum gas</p> <p>PM - 10mg/Nm³</p> <p>SO₂ - 35mg/Nm³</p> <p>TMA: 1mg/Nm³</p> <p>H₂S: 1mg/Nm³</p> <p>The RTO efficiency must be kept above 96%. The PLC must be able to record RTO (combustion) efficiency. Agree with the proposal in the Draft BAR that RTO efficiency must be measured biannually. One of these two biannual measurements must be conducted when the plant runs on full capacity.</p> <p>In no instance may the odour detection threshold for H₂S of 700ng/Nm³ be exceeded by any plant activity or plant process.</p>	<p>LAQS:</p> <p>LAQS agrees with these requirements and it will form part of the design specifications of the RTO unit.</p>
<p>PS4 - scrubber stack (extraction system bagging and grinding)</p> <p>There is a possibility that the air emitted through the scrubber stack (from cooling room) may contain TMA and or H₂S. For this reason the air from the scrubber must also be routed to the RTO for final treatment prior release.</p>	<p>LAQS:</p> <p>Including this gas stream (60 000 m³/h) into the RTO stream (14 000 m³/h) implies a massive RTO unit to deal with the combined gas stream. At times when production rate is low, e.g. when insufficient fish is available for full production, or when only waste from the canning plant is processed, the massive RTO unit will have to be operated at full capacity to maintain operating temperatures. This will result in the continuous emissions of greenhouse gases at maximum rate when even a small part of the plant is in operation.</p> <p>Cooling air, as well as building air from the grinding, packaging and storage areas will be passed through a sea water scrubber system to collect particulate matter that is entrained in the building air. Air from these dry process operations do not emit amines or H₂S as the product is now stable.</p> <p>In the unlikely event that this arrangement proves to be inadequate, a two stage scrubbing plant can be considered. The first stage will be a sea water unit followed by a second stage chemical scrubber.</p>

COMMENT / ISSUES	RESPONSES
<p>Ambient Air Quality Under no circumstances may the ambient air quality limits for any applicable pollutant be exceeded. It is assumed that the study was done in terms of a level two assessment but the air quality impact report did not indicate the following requirements:</p> <ul style="list-style-type: none"> - Property lines, including fence lines - Roads and railroads that pass through the property line <p>Location and dimensions of buildings and / or structures (on or off property) which could cause downwash of:</p> <ul style="list-style-type: none"> - Location - Length - Width - Height 	<p>LAQS: Correct</p>
<p>Indication of shortest distance to property line from significant sources. Area map(s) that include the following:</p> <ul style="list-style-type: none"> - Map of adjacent area (10km radius from proposed source) indicating the following: <ul style="list-style-type: none"> -- Latitude / Longitude on horizontal and vertical axis -- Nearby known pollution sources -- Schools and hospitals within 10km of facility boundary -- Topographic features -- Any proposed off-site or on-site meteorological monitoring stations -- Roads and railroads <p>Regional map that includes the following:</p> <ul style="list-style-type: none"> - UTM coordinates - Modelled Facility - Topography features within 50km - Known pollution sources within 50km 	<p>LAQS: A revised report with all of the required documentation will be provided.</p> <p>Cape EAPrac: The revised report provides more specific detail that was included in the Draft BAR but please note that there is NO change to the proposal, specified technology, volumes and thresholds and the predicted outcomes. As such this report is updated and provided to stakeholders for information purposes only and not for comment.</p>

COMMENT / ISSUES	RESPONSES
<p>Any proposed off-site meteorological monitoring stations Background Concentrations Specify background values to be used including supporting documentation. The specialists are given an opportunity to respond on the alleged shortcomings and his motivation will be assessed by the Licensing Authority.</p>	<p>LAQS: LAQS has recommended that a weather station be installed by Afro Fishing on their property, even if only to deal with possible complaints. These are expected as there are other sources of odours in the area and human nature dictates that Afro Fishing will be blamed. The remote location of Afro Fishing relative to other industries in Mossel Bay implies that a cumulative impact assessment will be worthless. In the absence of a local air quality monitoring station it is not possible to discuss the current status of air in the area. TMA is a very difficult substance to measure, especially at the very low concentrations estimated by the dispersion model. As a result a dedicated continuous ambient air quality monitoring system is not recommended.</p>
<p>(b) the pollution being or likely to be caused by the carrying out of the listed activity applied for and the effect or likely effect of that pollution on the environment, including health, social conditions, economic conditions, cultural heritage and ambient air quality.</p>	

COMMENT / ISSUES	RESPONSES
<p>The BAR indicate fisherman acting independently from Afro Fishing will be catching the fish for fishmeal production. There must be control mechanisms in place to also manage critical control parameters from the harvesting of fish, i.e. keeping at correct temperature and during transportation and offloading.</p> <p>Please indicate how the 24-hour delivery cut-off period of received product will be determined. What is the minimum level of temperature for received product and how will this be measured and by who and will this be recorded.</p> <p>If product from the vessels are rejected due to the cut-off temperature, how will this waste product be managed?</p>	<p>Afro Fishing: Currently there are three parties involved in the processing of pelagic species. The rightsholders, boatowner and the processing facility. Sometimes all three can be the same company or a combination of the roles. Agreements are signed annually between the three parties where prices, quantities and fish quality are defined. So yes, landed fish quality will always be determined (e.g. fish temperature, broken fish, TVBN level, etc.) in order to fix a price etc. In the case of landings to MB, only an acceptable quality fish will be accepted. If the fish is not fresh then the fishing vessel will have to steam to a facility on the West Coast or Gansbaai.</p> <p>Each net throw by a fishing vessel is recorded. The time of the throw, the quantity caught and the boat hold the catch was pumped into. From this info, the 24 hour rule can be determined. I would however propose that we first validate the parameters that will be possible for this factory. For example, fish that has not been cooled should be processed within 24 hours (based on my Hout Bay experience and the conditions of west coast AEL's I have perused). However fish that has been cooled can be kept for 3-5 days on refrigerated sea water (RSW) and achieve the same. We also need to assess what fishing parameters and timings will work for the RTO. I therefore see some validation work needed once we are operational and before final permit conditions are established.</p>
<p>Are there any outlets (vents) on the sealed product collection tanks, and if so, does this vents vent into the atmosphere or channelled to the RTO?</p> <p>The same applies to all the tanks used on the premises. Are all the sumps, waste heat evaporators and waste water related technology located under roof area, under negative pressure and all vapours directed to the RTO?</p> <p>If not, it is recommended that all processes be extracted to the RTO.</p>	<p>Afro Fishing: Both the fish meal and oil are transported in shipping containers. The fish meal is bagged so that is sealed. The oil is pumped into a big bladder which is inside a 20' container so also sealed. As you know the container is then sealed.</p> <p>All the tanks will be closed and vented to ducting that will extract to the RTO. The waste heat evaporator is a closed and sealed process. Some tanks and the WHE will not be under roof due to size and height limitations but do not need to be under roof for odour reasons.</p>

COMMENT / ISSUES	RESPONSES
<p>Notwithstanding the discharge water complying with the current and future NEM:ICMA Coastal Waters Discharge Permit, it must also comply with the air quality requirements in terms of offensive odours.</p>	<p>Afro Fishing: Correct, it will be a good idea to monitor odours in the water as well. Cooling water has traditionally not carried offensive odours.</p>
<p>It is advised that the building envelope be sealed, including, but not limited to windows, doors, vents, roof structures etc. The proposed building plans must include this requirement in the building design and be approved by the Municipal Building Department. It is advised that the architect liaise with us in order to incorporate these conditions in the architectural building plans. The extraction system must be so designed to cater for extraction even with open doors, openings used to enter exit the building, during offloading and similar processes. There must be a backup system in place during extraction unit malfunctioning. The Extraction unit must be powered by a backup power supply in the case of electricity malfunctioning or load shedding.</p>	<p>Afro Fishing: The building envelope will be sealed. The site will have backup power and spares for critical equipment. We will include this in the municipal plans as suggested.</p>
<p>Please provide a comprehensive inventory of all possible odorous plant processes and equipment and how it will be mitigated.</p>	<p>LAQS: The process can be divided into two distinct sections, i.e. a "wet" section and a "dry" section. The wet section consists of all of the process steps from unloading of the fish up and including the fishmeal drier. All of the process units included will be sealed units with extraction air being drawn off and treated in the RTO unit. The dry section consists of all of the process steps after the fishmeal has been dried, i.e. cooler, grinding, packaging and storage. The fishmeal will be treated with an anti-oxidant to reduce odorous emissions. Cooling air, as well as building air from the grinding, packaging and storage areas will be passed through a wet scrubber system to collect particulate matter that is entrained in the building air.</p>
<p>The EMP must be updated to include the new proposed plant.</p>	<p>Cape EAPrac: The EMP includes the details of the proposed plant and all specialist mitigations recommended. It is suggested that once the final design is provided, this will be provided to the competent authority, along with the required protocols.</p>
<p>What is the concentrations of TMA, PM and H₂S in the scrubber air released from the Salt Water scrubber as it is not directed to the RTO?</p>	<p>LAQS: It is unknown at this stage</p>

COMMENT / ISSUES	RESPONSES
<p>What is the concentrations of TMA, PM and H₂S in the seawater discharge?</p>	<p>LAQS: It is unknown at this stage</p>
<p>Measures must be taken to minimise dust and noise during the construction phase and it is advised that construction only take place during normal working hours from 07h30 to 17h00 on weekdays only.</p>	<p>Afro Fishing: Afro Fishing will abide by all building regulations and guidelines.</p>
<p>Afro Fishing must comply with the National Dust Control Regulations for industrial zones as indicated in the Regulation.</p>	<p>Afro Fishing: Afro Fishing will abide by all building regulations and guidelines.</p>
<p>Please indicate the estimated time for rectifying each of the three potential breakdowns (page 43 of Air Quality Impact Report) that could occur in the RTO.</p> <p>Taking into consideration that technology and technicians could not be readily available in South Africa. Please certify the competency of the Technical Director / Manager responsible for the RTO management. Also what back-up competency are in place during absence / resignation of the Technical Director / Manager.</p>	<p>LAQS: It is LAQS's understanding the breakdown repairs time is a matter of hours.</p> <p>Afro Fishing: I do think that the skills required and maintenance of the RTO has been overstated. The equipment is way simpler than a boiler and in South Africa boiler operators are plentiful. Nonetheless, specific training will be drafted for the RTO and critical spares will be kept in stock. The PLC is standard and can be maintained by an instrumentation technician.</p> <p>The expansion into a fish meal plant and the requirement for additional boiler capacity will trigger the 3000kW General Machinery Regulations 1998 and Afro Fishing will have to appoint a competent mechanical or electrical engineer. I am a chemical engineer so I will not be able to fulfil this role.</p> <p>I foresee therefore the appointment of an electrical engineer for the site who will also be the certified engineer, a production manager for the fish meal plant who will be either mechanically or electrically trained, a fish meal plant supervisor with technical and maintenance skills and a plant operator with processing and fault finding skills. The plant operator will need minimum matric plus experience operating machinery which is PLC controlled. There will also be alarming installed. As this will be a critical part of the process, I would imagine that alarms will be directed to myself or the site engineer via mobile phone and email.</p>

Nov-19

COMMENT / ISSUES		RESPONSES
22-1	Proper record keeping of raw materials used, their origins, time duration between loading and offloading at Afro, duration before processing, freezing capacity, time duration between defrosting and production (if applicable).	Afro Fishing: Correct, this will be required as per above.
	Please indicate which processes are not automated and what human factors could give rise to odour episodes.	Afro Fishing: Generally, fish meal plants are semi-automatic. This is because for example, a plant operator needs to visually check whether fish is cooked or not or needs to physically feel the dried fish meal between his fingers to be sure it is adequately dried. He then speeds up/slow down the plant accordingly or increases/decreases processing temperatures and steam supply. There will be a control room and a SCADA system from where all processing parameters can be monitored and the plant controlled.
	What wastes are generated and not treated, if any? If yes, what happens to this waste.	Afro Fishing: There is no processing waste from a fish meal plant as the idea is to process everything in order to achieve the best yield possible. There may be some sludge from the fish oil tanks. This will be drummed and sold to local farmers for animal feed. The intention however is to improve the existing cannery discharge water quality as part of the expansion project. A DAFF unit and settling tanks will be installed. This is now possible as the skimmed solids can be put through the fish meal plant.
	Social conditions: It is recommended that the recommendations of the socio-impact report be implemented.	MPBS: No response required. Cape EAPrac: This office supports the implementation of the specialist recommendations.

COMMENT / ISSUES	RESPONSES
<p>Economic conditions: It is recommended that the recommendations of the socio-economic impact report be implemented.</p>	<p>MPBS: No response required.</p> <p>Cape EAPrac: This office supports the implementation of the specialist recommendations.</p>
<p>Health: The specialist impact report indicated that there would be no impact of the facility on the health of the community. The installation of the Best Available Technology, namely RTO, extractions system and seawater scrubbers is non-negotiable. All the recommendations of the Air Quality Impact Report must be implemented. Please incorporate Health comments made by the Municipal Health Office (Mossel Bay) of the GRDM.</p>	<p>Cape EAPrac: Please note that no comments have been received to date from the Municipal Health Office of the GRDM.</p>
<p>Cultural Heritage: The heritage report indicated no impact on heritage resources of cultural significance. It is however supported that all recommendations be incorporated in possible authorisation, if granted.</p>	<p>Cape EAPrac: So noted.</p>
<p>Ambient Air Quality: Please refer to (a) above.</p>	
<p>Planning: The Planning Report indicated that the development proposal is consistent with the MBSDF (2019), the Mossel Bay IDP, the Mossel Bay Central Precinct Plan (2013), the National Port Plan (2015) and the Mossel Bay Municipality's Integrated Zoning Scheme (2017). It is supported that the applicant must apply for consent use in terms of the Mossel Bay Municipality's Integrated Zoning Scheme (2017).</p>	<p>DELplan: We agree with this statement.</p> <p>The zoning of the subject property according to the Mossel Bay Integrated Zoning Scheme By-Law is "Transport Zone I: Transport Use". "Transport Zone I: Transport Use" has a secondary right, namely Industry (Industrial Zone II). Thus, we will apply for a consent use application.</p>
<p>(c) the best practical environmental options available that could be taken to - (i) prevent, control, abate or mitigate that pollution; and (ii) to protect the environment, including health, social conditions, economic conditions, cultural heritage and ambient air quality, from harm as a result of that pollution.</p>	

COMMENT / ISSUES	RESPONSES
<p>The specialist report indicated that, modern, state-of-the-art fishmeal production is planned. This includes regenerative thermal oxidation (RTO) treatment of all vapours generated in the fishmeal production process to prevent any odorous emissions from escaping from the plant. If the application is successful, the RTO (together with seawater scrubbers for PM abatement) is regarded as BAT in terms of category 10 of G.N. 893 that will be allowed by the Licensing Authority to abate all offensive odours.</p>	<p>Cape EAPrac: That is correct.</p>
<p>The Draft BAR indicated an automated system and PLC on all processes including the RTO. Please indicate all the human factors involved in monitoring the PLC and ensuring that the RTO and subsequent processes are running flawlessly.</p>	<p>Afro Fishing: As mentioned above there will be processes that will be fully automatic such as the RTO plant and boiler and other processes that are semi-automatic. Overall the plant will be PLC controlled with operator intervention needed as described above.</p> <p>Like all factories, we cannot get away from the human element.</p>
<p>What measures are in place if the general extraction / ventilation systems break down?</p>	<p>Afro Fishing: There will be backup power and normally ventilation does not run with only one fan. There will be several fans so if one fan needs to be maintained this will not affect the ventilation much. If all fans are down the factory will remain sealed and will just not ventilate. It will however start to get warm in the factory though.</p>
<p>The suppliers of the RTO must also take responsibility for the design of the extraction / ventilation system.</p>	<p>Afro Fishing: We will certainly consult with the supplier in this regard. This will be the only way to hold them accountable for the performance of the RTO.</p>
<p>There must be back-up power supply available for the controlling of the PLC and the ventilation / extraction systems and the ID fans.</p>	<p>Afro Fishing: Correct</p>
<p>Maintenance agreement with the supplier of the RTO is essential. This must include clauses that warrants offensive odour-free operation at all times and back-up systems during plant breaks.</p>	<p>Afro Fishing: Correct. This will have to be the case as Afro Fishing will want the necessary assurances considering we are investing a large sum and cannot carry the risk of plant closure due to non-performance w.r.t. odour abatement.</p>

COMMENT / ISSUES	RESPONSES
<p>(d) section 24 of NEMA and any other applicable environmental impact assessment done, the decision taken on the application of the environmental authorisation, and any applicable notice issued or regulation made pursuant for that section substituted by Section 7 of the Air Quality Amendment Act, 2014 (Act 20 of 2014).</p>	
<p>The Atmospheric Emission License decision may only be granted or refused after the Environmental Authorisation is granted.</p>	
<p>(e) any relevant tradable emission scheme</p>	
<p>N.A. No such tradable emission scheme is applicable in South Africa yet.</p>	
<p>(f) whether the applicant is a fit and proper person as contemplated in Section 49 of the NEM:AQA.</p>	
<p>The test for a fit and proper person in terms of Section 49 of NEM:AQA is:</p>	
<p>(a) That person has contravened or failed to comply with this Act, the APPA or any other legislation applicable to air quality;</p>	<p>Afro Fishing: We understand the importance of compliance and have not contravened any of these legislation.</p>
<p>(b) that person has held a provisional or full AEL or other authority that has been suspended or revoked;</p>	<p>Afro Fishing: Afro Fishing has not held a full AEL which has been suspended or revoked.</p>
<p>(c) that person has been a director or senior manager who is or was a director or manager of a company, juristic person or firm to whom paragraph (a) or (b) applies; or</p>	<p>Afro Fishing: This has not been the case.</p>
<p>(d) the management of the listed activity which is the subject of the application will or will not be in the hands of a technically competent person.</p>	<p>Afro Fishing: The listed activity will be managed by a technically competent person. As MD, I, Deon van Zyl, am fortunately also an engineer and technically competent with at least 20 years of production and processing experience.</p>
<p>Cape EAPrac must test the applicant against the criteria for a fit and proper person and confirm in writing that the applicant and technically competent person, managing the listed activity complies with all the criteria.</p>	<p>Cape EAPrac: This office has tested Mr Deon van Zyl against the criteria for a fit and proper person and confirm that he is technically competent for managing the listed activities as contemplated in Section 49 of the NEM:AQA.</p>
<p>(g) the applicant's submissions</p>	

COMMENT / ISSUES	RESPONSES
<p>The following studies were submitted by Cape EAPrac on behalf of the applicant:</p> <ul style="list-style-type: none"> - General submissions such as site maps, media articles, layouts etc. - Socio-Economic Impact Report - Specialist Air Quality Impact Report - Traffic Impact Report - Planning Statement - Engineering Services Report - Visual Statement - Heritage Report - EMP - Fact finding mission feedback etc. 	<p>Cape EAPrac: That is correct.</p>
<p>All the submissions were assessed and evaluated to find a balance between positive and negative comments and any shortcomings were highlighted under the specific applicable Section 39 factors.</p>	<p>Cape EAPrac: So noted.</p>
<p>(h) any submissions from organs of state, interested persons and the public</p>	
<p>This factor can only be evaluated after the comments and response document has been completed by Cape EAPrac.</p>	<p>Cape EAPrac: All submissions from stakeholders have been collated and responses provided in a Comment & Responses Report. This has been circulated to all registered I&APs for information purposes prior to the submission of the Final Basic Assessment Report to the competent authorities.</p>
<p>(i) any guidelines issued by the Minister or MEC relating to the performance of the licensing authorities or their functions.</p>	
<p>Not applicable. It must be mentioned that the Licensing Authority (GRDM) has an excellent reputation with the Provincial and National Environmental Management (Air Quality Directorates).</p>	<p>Cape EAPrac: So noted.</p>
<p>General aspects:</p>	

COMMENT / ISSUES	RESPONSES
<p>It must be noted that any BAT's efficacy is dependent on various design and operational factors. Although this technology is deemed as BAT but the USEPA, the applicant is still responsible to mitigate all plant emissions in order to prevent any offensive odours and to comply with the minimum emission limits that will be specified in the Atmospheric Emission License, should Environmental Authorisation be granted.</p>	<p>Afro Fishing: Afro Fishing accepts this responsibility.</p>
<p>Furthermore should the LA require any other relevant documentation and / or information during the AEL application process such documentation or information will be requested in terms of section 37 of the NEM:AQA (Act 39 of 2004).</p>	<p>Cape EAPrac: So noted.</p> <p>Afro Fishing: Noted.</p>
<p>Please note that if the Environmental Authorisation is recommended, it is inter alia based on the Specialist report from LAQS, and all other specialist studies conducted, which clearly indicate negligible environmental impact from the proposed plant. The GRDM therefore reserves the right that the applicant, its's Environmental Assessment Practitioner and the Specialists take full responsibility of any deviation from the specialist reports outcome and to vary our comments, proposed conditions and / or authorisation if the actual conditions deviate significantly from the conditions as per the specialist study.</p>	<p>Cape EAPrac: So noted. It is must be pointed out that if any conditions of an Environmental Authorisation require deviation, an Amendment Application will have to be submitted to the authorising authority.</p> <p>Afro Fishing: Noted.</p>
<p>If the Authorisation is granted, the subsequent application for a Provisional Atmospheric Emission License (PAEL) must be submitted. If the application is successful, a Provisional AEL will be issued to enable commissioning of the plant. A PAEL is valid for one year from date of commissioning and may be extended for an additional one year on good cause shown to the Licensing Authority. A full AEL may only be issued if Afro Fishing has been in full compliance with the conditions and requirements of the PAEL for a period of at least 6 months.</p>	<p>Cape EAPrac: So noted. It is recommended that all relevant monitoring requirements are put in place prior to the operation of the facility in the event of its authorisation. This will ensure that compliance monitoring as part of the PAEL will provide as comprehensive a set of data as possible.</p> <p>Afro Fishing: Noted.</p>

COMMENT / ISSUES	RESPONSES
<p>If the plant is transferred to a new owner(s), or the ECO (sic) is replaced, the Licensing Authority is reserving the right to test the new owner(s) and / or CEO against the criteria for a fit and proper person and may refuse the transfer if the new owner(s) and or CEO is not fitting the required criteria.</p>	<p>Cape EAPrac: This office supports this recommendation.</p> <p>Afro Fishing: Noted.</p>
<p>It is further recommended that all recommendations in the specialist reports, Draft BAR, Authority inputs and selected public comments be evaluated for merit and included in the conditions of authorisation.</p>	<p>Cape EAPrac: This office supports this recommendation.</p> <p>Afro Fishing: Noted.</p>
<p>Response on Comments from Mr Hugo Coetzee, his wife J. Coetzee and Ms M Kapp:</p>	
<p>Mr and Mrs Coetzee is the owners / Directors of Southern Cape Fish Meal (Pty) Ltd that was closed down due to refusal of issuing their AEL and subsequent appeal due to various reasons. Their facility caused offensive odour in Mossdustrria and the greater Mossel Bay. The GRDM was inundated by complaints from the community and had no other alternative, but to decline their AEL renewal license.</p>	<p>Cape EAPrac: So noted.</p>
<p>Their industry received product from Afro Fishing and therefore possibly would have negatively influenced their business if the proposed Afro Fishing project was approved, as they would have lost a substantial percentage of their raw material.</p>	
<p>The wild allegations made against J. Schoeman and A. Andries by Mr and Mrs Coetzee is without any proof what so ever. Afro Fishing (Pty) Ltd current processes is not Fish Meal production for various technical reasons and is not Animal Matter Processing (Cat 10) in terms of Section 21 of the Air Quality Act (as was the case with Southern Cape Fish Meal). The whole matter was explained to them in two separate letters that are on record. Expert opinions from consultants in the field of fishmeal productions, the Environmental Assessment Practitioner and the EIA department were also obtained, which is on record.</p>	<p>Cape EAPrac: This was also explained to them in response to their initial comments by this office.</p>

COMMENT / ISSUES	RESPONSES
<p>It is also important to note that one of the employees of Southern Cape Fish Meal submitted comments in her handwriting and is word for word the same as that of her employer. Some of these people, whose names and contact details that the employee registered as Interested and Affected Parties, were contacted by Cape EAPrac and they did not even know that their names were used in these documents / comments. The employee, when confronted, withdrew her comments.</p>	<p>Cape EAPrac: Some comments were resubmitted with confirmation from the authors confirming the submissions as theirs. These were included in this report.</p>
<p>The GRDM deny allegations of wrongdoing on the part of the two (2) officials and Mr & Mrs Coetzee is put to the test to proof the unfounded allegations of corruption and foul play. If they cannot proof the alleged wrongdoing, they must immediately withdraw their comments, in writing. If not, the GRDM reserves the right to seek further legal action.</p>	<p>Cape EAPrac: This matter should be clarified between the GRDM and Mr & Mrs Coetzee. Should either party wish to withdraw their comments, they should do so in writing to this office.</p>
<p>Background Information Document</p>	

COMMENT / ISSUES	RESPONSES
<p>This is a very sensitive area i.to. residential, commercial and tourism activities.</p>	<p>LAQS: The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6, which addresses the impact on local tourism and businesses. If the proposed mitigation measures are implemented, there should be very little (if any) negative impact on local businesses. On the contrary, local businesses could benefit from the increased demand for goods and services, both during construction and operations.</p> <p>Afro Fishing: Noted and this is why we need to apply for the necessary municipal authorisations.</p>

COMMENT / ISSUES		RESPONSES
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">26-Feb-19</p> <p>The Zoning will be one of the most important factors that must be taken into account for the proposed development.</p>	<p>Delplan: The zoning of the subject property according to the Mossel Bay Integrated Zoning Scheme By-Law is "Transport Zone I: Transport Use". "Transport Zone I: Transport Use" has a secondary right, namely Industry (Industrial Zone II). The definition of an Industry is as follows: "Industry" means a property used as a factory and in which an article or part of the article is made, manufactured, produced, built, assembled, compiled, printed, ornamented, processed, treated, adapted, repaired, renovated, rebuilt, altered, painted (including spray painting), polished, finished, cleaned, dyed, washed, broken up, disassembled, sorted, packed, chilled, frozen or stored in cold storage; including offices, caretaker's quarters, factory shop or other uses that are subservient and ancillary to the use of the property as a factory;"</p> <p>This definition does not include a noxious trade or risk activity. The air quality assessment (done by Lethabo Air Quality Specialists (Pty) Ltd), however, made recommendations so that odour generation can be reduced substantially by adhering to the recommendations in the report.</p> <p>The proposal is therefore not a noxious trade and no split zoning is needed. The new section can be handled as a consent use only.</p> <p>Afro Fishing: Correct. There is no intention to not abide by zoning regulations.</p>	

COMMENT / ISSUES		RESPONSES
	This activity will have to implement the Best Available Technology (BAT) in order to mitigate and prevent any offensive odour, even under upset conditions.	<p>LAQS: The odour abatement technology that will be used is state-of-the-art and has two key components. Firstly, a custom-designed extraction system extracts air from each part of the process for thermal treatment in the RTO system. This system has been proven to be successful in the destruction of all odorous emissions from fishmeal plants. The system will be managed by an electronic control system that monitors several key parameters in the process and will have a two-stage alarm / shutdown interlock feature to prevent operation of the plant under upset conditions.</p> <p>Afro Fishing: Best available technology has been motivated by the project team. This is the reason for using EU factories as a benchmark as many of these factories operate successfully in similar environments to the Mossel Bay harbour.</p>
	Ensure notification of DEA&DP, local municipality, Dept. of Health, Land Use Planning and Heritage Society.	<p>Cape EAPrac: Please refer to the I&P List for all registered stakeholders.</p>
Scholtz, D- Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Schultz, Angelique- Afro Fishing employee		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Seddon, R - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Serfontein, Ricus - Private		
	Registered as I&AP	Registered 12 December 2019
Draft Basic Assessment		

COMMENT / ISSUES	RESPONSES
Please register me as an interested and affected party as per your regulations	<p>Thank you very much for your email. I have registered you as an Interested & Affected Party (I&AP) for the Environmental Impact Assessment process. This will ensure that you receive all future correspondence relating to this application.</p> <p>All comments are being collated and responses will be provided in due course. The updated Comments & Responses table will be circulated to all registered I&APs early in the new year.</p> <p>Please feel free to review all available documentation on the website link</p>
My property is situated directly above the harbour, and this development will have a direct, negative impact on the future value of my property due to the following facts:	
INCREASED NOISE LEVELS FROM ADDITIONAL FACTORIES	<p>Afro Fishing: The expansion will have less noise than the existing cannery. Any noisy machinery will be insulated.</p>
INCREASED HEAVY VEHICLES MOVING IN AND OUT . CONTINUOUS REVERSE BUZZERS ON TRUCKS AND FORKLIFTS .	<p>Afro Fishing: The new fish meal plant will not need to move pallets of product outside at night. Limited forklift activity will be required indoors so reverse buzzer noise will be limited. Our buzzers are set on the lowest allowed frequency and loudness.</p> <p>Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation and traffic distribution. Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility is located within a working harbour.</p>

COMMENT / ISSUES	RESPONSES
<p>TO ENTERTAIN 1000 TONS OF FRESH FISH PER DAY , YOU WILL REQUIRE 25 ADDITIONAL DIESEL POWERED FISHING VESSELS AT CURRENT AVERAGE OF 40 TONS PER VESSEL . THEY ALL NEED DIESEL AND MAINTENANCE . YOU WILL ONLY UNDERSTAND THE IMPACT ON NOISE LEVELS , IF A PROPER STUDY IS UNDERTAKEN , THAT WILL INCLUDE POLLUTION LEVEL INCREASE .</p>	<p>Afro Fishing: The noise level of the new fish meal plant will be less than that of the current cannery operation. The building will also be a sealed unit preventing the even lower level of noise to dissipate. The factory will be located in the designated fishing area of the port where industrial activities are approved. The design capacity is 1000 t.p.d to cater for the very good fishing nights. These may only comprise 20-30 fishing nights in the year. For the rest of the season boats bring in what they can find. A large pelagic trawl vessel can catch 600 tons +. The smaller purse seine trawlers can catch 100-250 tons. We therefore envisage a scenario of about 3-5 fishing vessels servicing the factory. There is already that many and more fishing vessels servicing the cannery when there is fish caught in Mossel Bay waters. The Port of Mossel Bay has a major fishing component and hence it is normal for trawlers to be productive in the harbour. This is actually good for the economy as fishing crews must be paid, local service/maintenance companies benefit and the harbour is better utilised. Diesel is purchased, etc. Currently the harbour is at best 20% utilised. The Portnet strategy is to increase this utilisation factor. Excessive noise is a nuisance and must be managed and mitigated. However if normal day-to-day sound (such as the sound on our roads and in our schools) are to stop industry then the Port of Mossel Bay may as well be decommissioned. This will force the closure of the oil and gas industry, the fishing industry and any other of the Portnet growth opportunities listed in their long term planning documents. There will be no increase in noise or activity above that of I&J when they still occupied the premises. In fact, there will be less sound as certain motors will be sound proofed.</p>

COMMENT / ISSUES	RESPONSES
<p>A PROPER MARINE IMPACT STUDY NEED TO BE UNDERTAKEN TO DETERMINE THE INCREASED ACTIVITY IN AND AROUND THE HARBOUR , AND WHAT EFFECT IT WILL HAVE ON MARINE LIFE .</p>	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p>

c-19

COMMENT / ISSUES	RESPONSES
<p>12-Dec</p> <p>THE AIR QUALITY REPORT IS A ONE SIDED REPORT WITH NO SUBSTANCE AS IT WAS NEVER DONE OVER A LONG PERIOD THAT INCLUDE DIFFERENT POLLUTANTS , WIND CONDITIONS ETC .</p>	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>

COMMENT / ISSUES	RESPONSES
<p>IT IS VERY WORRYING THAT THE IMPACT ON CURRENT AND FUTURE TOURISM HAS NOT BEEN INCLUDED IN THE INNIAL REPORT . I WOULD STRONGLY SUGGEST THAT A TOURISM REPORT IS ADDED TO THE EIA ? THE NEW WATERFRONT DEVELOPMENT WILL BE AFFECTED NEGATIVELY .</p>	<p>Cape EAPrac: The Port of Mossel Bay is owned and managed by the TNPA. They have developed their short, medium and long term planning for the port. This information is included in the reports. According to these plans, commercial fishing industries will remain and be developed on the western side of the port, whilst tourism type development will be accommodated on the eastern side of the port.</p> <p>TNPA: The plans for the port that will enhance tourism / waterfront / passenger liners, will all be done on the eastern side of the port, developing and expanding Quay 4 – not in the area where Afro Fishing is proposing their development. The Port will be developed to support four main strategic streams:</p> <ol style="list-style-type: none"> 1. Oil and Gas – Quay 4 and expansion on western side as well as Transnet land adjacent to the port. 2. Fishing Quays 1,2,3,4 and expansion to the western side. 3. Ship repair / ship building as per PDFP and in expansion to the west, as well as Transnet land adjacent to the Port. 4. Tourism Non-operational part of Quay 4 and possible cruise boarding facilities from Quay 4 and eastern development <p>The Port will not change into a marina on the inside of the port. Operational areas will remain operational and we will grow further , we are also planning to revitalise the rail service through the entire port to support the economy and our associated industries.</p> <p>MPBS: This is a statement and no response is required. Also, note that as far as we know, the Waterfront development has been proposed, but not yet approved by TNPA. See previous comment</p>

COMMENT / ISSUES	RESPONSES
<p>OUR OLD ROAD INFRASTRUCTURE WAS NEVER DEVELOPED TO COMPLY TO THE NEW REQUIREMENT FOR HEAVY VEHICLES .</p>	<p>Urban Engineering Road pavements are designed according to an equivalent E80 axle load. The actual maximum vehicle axle load is governed by legislation. No vehicles are allowed to exceed the maximum axle load used in the structural design of the road pavement. A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>
<p>THE IMPORTS FROM MOROCCO , ARRIVING BY ROAD FROM PE HARBOUR , ARE OVERLOADED BY AT LEAST 6 TO 8 TONS PER CONTAINER !!!THEY ALL ARRIVE AT NIGHT IN ORDER TO BYPASS THE WEIGHBRIDGES ON ROUTE ! IN ORDER TO VERIFY MY ACCUSATION , YOU MAY REQUEST DELIVERY DOCUMENTS FROM AFRO FISHING AND THE TRANSPORTER IN QUESTION .</p>	<p>Afro Fishing: The overloading by 6-8 tons is not correct. Our containers must comply with shipping and road transport regulations. We will make shipping documents available if required. The expansion project will not be importing or transporting any raw material so I am not sure how this allegation of overloading is relevant to this project.</p>
<p>THE INFORMATION WITH REGARDS THE FISHROT SCANDAL , AND DIRECTORSHIPS ARE A SERIOUS MATTER AND NEED TO BE CLARIFIED BY ALL PARTIES CONCERNED .</p>	<p>Afro Fishing: The “fish rot” scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>

Shabalala, Sandra - TNPA

COMMENT / ISSUES		RESPONSES
	Automatically registered as an I&AP.	Registered 29 October 2019
Shami, Samuel - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		
	This email serves to register our objection to the planned establishment of a fish meal facility in in the Mossel Bay Harbour as we have serious concerns with regard to:	Cape EAPrac: Thank you for your participation, your objection is noted.
	<ul style="list-style-type: none"> • The extent of the environmental impact assessment 	Cape EAPrac: The Background Information Documentation (BID) outlined the Environmental Impact Assessment (EIA) process that is being followed in compliance with the National Environmental Management Act (NEMA, Act 107 of 1998) along with the 2014 EIA Regulations. The BID and initial call for registration led to the appointment of additional specialists to the project team. The studies have all been incorporated and included in the Draft Basic Assessment Report which will be made available to all registered I&APs. Your registration thus ensures that you will be included in all ongoing documentation associated with this proposal. On completion of the public participation on the Draft BAR, the final document will be submitted to the Department of Environmental Affairs & Development Planning (DEA&DP) for decision making.
		Cape EAPrac: The design and process flow of the proposed fishmeal will not be like any existing fishmeal plants in the country. The introduction of technology that will in all likelihood become the Best Available Technology in a contentious industry should also be seen as an important aspect. It sets aside the port of Mossel Bay as an innovative hub. Afro Fishing: Research was done by the CSIR in Hout Bay and it was proved that there are no harmful emissions emanating from the fish meal plant. This is the situation throughout the world where fish meal plants are mostly located in coastal towns. The issue is entirely odour related.

COMMENT / ISSUES		RESPONSES
25-Mar-19	<ul style="list-style-type: none"> The effect the planned facility will have an effect on the health of Mossel Bay residents, as experienced many years ago in Hout Bay when a similar plant was put into production 	<p>LAQS: With all due respect, the plant proposed by Afro Fishing is not similar to the one in Hout Bay as it will operate on state-of-the-art technology. The odour abatement technology that will be used has two key components. Firstly, a custom-designed extraction system extracts air from each part of the process for thermal treatment in the RTO system. This system has been proven to be successful in the destruction of all odorous emissions from fishmeal plants. If the relevant company in Hout Bay were to use the same technology, all odorous emissions will disappear from the site. The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p>
	<ul style="list-style-type: none"> The real economic impact of establishing the facility contemplated has probably not been assessed. Mossel Bay must decide if it is a tourism orientated destination of an industrial town, this will determine the way to go 	<p>Cape EAPrac: A Socio-economic Impact Study has been initiated. Please note the findings of this study.</p> <p>MPBS: The economic impact in terms of job creation and contribution towards local economic income and business development was assessed in the SIA, section 8.</p>

COMMENT / ISSUES		RESPONSES
<ul style="list-style-type: none"> In the last few years we invested and established a top rated restaurant in Mossel Bay which could have been in vain if such a facility is established in the harbour. On face value it would seem that we have to reconsider remaining in Mossel Bay 		<p>LAQS: On face value you should not be too hasty. In our opinion Mossel Bay can do with a top rated restaurant. Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular sections 8.3.6 and 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on tourism and property values.</p> <p>Afro Fishing: There are very successful restaurants and hotels close to the Hout Bay and Cape Town Waterfront fish meal plants and others throughout the world. The emissions can be controlled and in this case will not affect your business.</p>
Sheppard, Michael - Private		
Registered via email	Registered 3 December 2019	
Draft Basic Assessment		
First and foremost, as I'm currently out of town, thank you all present to afford my 2c of thoughts, albeit that this topic be way more complexed, to be read out at this gathering.		
For those that are for this Plant, please consider the following.		

COMMENT / ISSUES	RESPONSES
<p>1. The Directors, major Shareholders and or any other form of ownership should exceed the highest level of ethics and morals. There is currently an email in circulation that if factual or not, raises alarming concerns of the potentially negative impact a facility like this could have for the greater community of Mossel Bay if the highest levels of ethics, morals and good governance does not prevail at all times by ownership as only ownership will pass on this ethos and strictly control these virtues throughout their management and employees for the entire duration / longevity of this entity.</p> <p>It is therefore my opinion that those against this plant be afforded the opportunity to scrutinize and ratify that the owners, directors, major shareholders or any other form of ownership prove a legacy of the highest morals and ethics.</p>	<p>Afro Fishing:</p> <p>I think Afro Fishing has always had a high standing in this regard. It is not the intention of the new owners and management to change this. In fact, doing business in the fishing industry and the reliance on fishing quotas makes it even more critical to have the highest levels of morals and ethics. Afro Fishing is also a level 1 B-BEEE company so there are many other checks and balances in this regard that need to be ticked.</p> <p>I have worked for the listed Oceana Group in excess of 15 years and worked for the multinational, Unilever, for more than 5 years. I am happy that you check my values and management style with these companies.</p>

COMMENT / ISSUES	RESPONSES
<p>2. Noise Disturbance versus Noise Nuisance.</p> <p>Noise disturbance can be measured scientifically, so control measures are simplified. I carry no knowledge of what powers truly rest on the local municipal authorities as prescribed by the acting environmental minister and how the changes in legislation as prescribed from time to time by the acting environmental minister may affect the levels of noise pollution and to what extant local authority may adjust the levels as demanded by the greater community, however, Noise Nuisance is a subjective matter.</p> <p>It is therefore my opinion that those against this plant be satisfied with a blue print that governs this subject view. For example, micro geographical mapping of the residential part of town that would be most affected by noise nuisance generated from time to time by this processing plant. As a further explanation, when the South Easter blows, the community along Santos beach, 5th avenue, 6th avenue and Lang street will be more negatively affected than those living in the CBD or towards the point... the same could be said for those living in the CBD when the NW blows or those along Beacon Point and Point area when the Westerly blows... so therefore a simple 51% "For or Against" any matter /</p> <p>Concern that needs to be voted on, cannot simply be the greater constituents of the "onderdorp" residents, as defined by local authorities pertaining to the boundaries of the Local Policing Forums, as the effects of the noise will be defined by the prevailing winds at which time the noise nuisance occurred.</p>	<p>Afro Fishing: Noise pollution will not become an issue as noisy equipment can be insulated.</p>

COMMENT / ISSUES		RESPONSES
03-Dec-19	<p>3. Air Pollution.</p> <p>This is my greatest concern as I'm sure it is with most of those that are against and for this plant. It is my understanding that this processing plant has been designed and will be constructed to the highest international standards and newest ground breaking technology that currently exists. It therefore should be a simple process for those that are for this project to guarantee those that are against it, that under no circumstance will the impact of the daily operations of this plant adversely or negatively impact the quality of Air within the greater Mossel Bay. It is to be expected that from time to time, failures in systems could have a negative affect and therefore those that are against this project should be satisfied that the timeframes and processes to correct these potential failures that contributed towards the negative Air Quality or should I say, Air Pollution, be rectified in a manner and timeframe acceptable by those against this plant.</p>	<p>LAQS:</p> <p>It is our understanding that the plant will be operated to the best of Afro Fishing's abilities, partly because it fits into the business plan to do so, but most certainly to have the minimum impact on the surrounding area and its inhabitants. However, while it is certainly not expected to be a regular occurrence, it must be accepted that breakdowns may occur from time to time. From an odour control point of view, any part of the process can break down without the emission of odours, as long as the RTO unit is in operation. The PLC controller will stop the process should the RTO unit break down, thus stopping the processing of fish. It is LAQS understanding that associated repairs will be effected in a matter of hours and not days.</p> <p>Afro Fishing:</p> <p>Your assessment is correct. 'Best proven' technology and practises will be applied and breakdowns will have to be corrected within certain timeframes. Critical spares will therefore be kept and suitably qualified staff employed to operate such a plant.</p>

COMMENT / ISSUES	RESPONSES
<p>4. Exit Strategy. Simply turning the proverbial lights off is clearly not an option.. Those that are for this processing plant should satisfy those that are against this processing plant that guarantees are in place for this potential plant to be shut down and removed or remodelled within realistic and suitable timeframes in order for it to not create a prolonged or have a negative impact on the greater Mossel Bay. It is my opinion that the current cost, ratified by an independent accredited institution, of shutting down a processing plant of this nature within suitable timeframes as accepted by the greater community of Mossel Bay, be placed within a Municipal Trust which sole purpose is to fund the closure should the ownership, major shareholders, directors or any form of ownership not be in a financial position to do so when called upon. This fund should be linked to the CPI Index, as well as any changes to legislation that could have an adverse affect on the cost, and therefore annual contributions by the Owners, Directors, major shareholders or any other form of ownership should be made so that the fund is equivalent to the market related costs of shutting down a processing plant of this nature should the need arise. The fund should be placed in an interest bearing account for the benefit of the owners, directors, major shareholders or any other form of ownership.</p>	<p>Afro Fishing: If a plant like this has to shutdown, we simply stop the plant and lock the doors. There are no costs that cannot be recovered from an auction or the sale of stock and machinery. As I&J disinvested from Mossel Bay so it will be possible for this plants closure and departure if necessary. Remember this is not a mine where land has to be rehabilitated and returned to its original condition, etc. Portnet takes ownership of the buildings as per the lease terms and the lessee clears their machinery and equipment.</p>
<p>As complexed as this application is, I believe that our community has many highly educated and experienced members that can map out the blue prints needed for the above and if those that are for this processing plant can deliver on the 4 points above, then those that are against it should consider the loss to the job market and the ripple affect that has on a community such as ours...</p> <p>There is merit on both sides. Surely we can rally together and come to a sustainable working agreement..</p>	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>
Sheppard, Amanda - Private	
Registered via email	Registered 3 December 2019
Smalberger, Dennis - Private	

COMMENT / ISSUES	RESPONSES
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment	
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.	
I hereby object to the proposed establishment of the fishmeal factory in the Mossel Bay port area	
<p>There used to be industrial buildings and businesses in and around the Mossel Bay harbour area. These businesses closed and over the years that followed, the Mossel Bay Municipality approved developments that literally bordered the port, for example the sectional title development on Erf 14177 and Erf 14465 Mossel Bay. Another example is the development of the Protea Hotel where an old factory was built. There are four guest houses in the area within a 500m radius of the proposed factory. Mossel Bay's business centre falls within this radius. The Mossel Bay harbour area up to and including the point is the area frequented by tourism and visitors throughout the year and known around the world. Mossel Bay and its surroundings contribute to this flow of tourism and visitors.</p>	
In view of this, I believe that the proposed factory will have a negative impact on Mossel Bay as a whole and that the value of any property, especially in the immediate area, will be adversely affected and affected.	<p>Cape EAPrac: According to the specialist investigations, the impacts on the environment are expected to be Low to Medium, with air quality deemed to be Very Low.</p>
Furthermore, I am not convinced by the assurances and what is mentioned by the developer that there will be no pollution or at least that it will be at an acceptable level. The so-called work that will be created by this development and the benefits that the business will benefit from is also another major uncertainty.	<p>Afro Fishing: The project will not get the green light by the investors and directors unless there is a reasonable financial return. With regards pollution, several environmental permits will be required. Each will have its own set of permit conditions. Afro Fishing will have to abide by these permit conditions if they are not to be revoked and the plant shutdown.</p>

COMMENT / ISSUES		RESPONSES
12-Dec-19	<p>The fishing quotas that will be awarded through the possibility of this project will greatly and seriously affect fish life in the waters off the south coast. All fish caught in the nets will be processed into fishmeal. Bulk catches of the fish on the west coast have caused the fish to disappear and the same will happen in this part of the coast.</p>	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: The various fisheries are regulated by DAFF and other government departments with the aim of preventing over fishing, etc.</p> <p>As per the environmental permit conditions there are also fishing permit conditions which clearly outline what can and cannot be caught. These are management by the Department of Fisheries who with scientists ensure that fish specie biomasses' and eco-systems are sustainably managed.</p>
	<p>Therefore, I believe that Mossel Bay Municipality will have to take into consideration the residents and taxpayers when making these decisions. Fishing quotas by the department concerned may as well be given to local fishermen who will create just as many job opportunities.</p>	<p>Afro Fishing: Pelagic species are not normally allocated by the Department of Fisheries to small scale fisherman as it is in the interest of the country that these species generate the required income for the country from this resource. Fishing trawlers to catch pelagic fish start at R25m and processing factories like canneries and fish meal plants start at R150m each.</p>
	<p>The opposition to such fishmeal factories is known worldwide. The applicant in this case will benefit the most in all respects. The proposed fishing plant is therefore not, in my opinion, the appropriate industry for Mossel Bay harbour and the environment.</p>	<p>Cape EAPrac: Thank you for your participation in this EIA process.</p>
Smalberger, Gys - Private		
	Registered via email	Registered 25 March 2019
Draft Basic Assessment		
	It feels like the wool has been pulled over our eyes and that the public is tagged along	

COMMENT / ISSUES		RESPONSES
27-Nov-19	<ul style="list-style-type: none"> • Explain the process until it reaches the final decision 	<p>Cape EAPrac: The EIA process is a statutory process that has various steps that must be followed. For clarity sake, I have again provided a copy of the presentation that was given on the 20th November. Page 4 provides a summary of the Environmental process that is being followed. This information has also been provided and referenced in the original Background Information Document, as well as in the Basic Assessment Report. I am also including a copy of the 2014 EIA Regulations which provides for the process.</p>
	<ul style="list-style-type: none"> • Have you allowed room for appeal once a decision has been made? 	<p>Cape EAPrac: As you can see in the summary of the EIA process, as well as in the Regulations themselves, an Appeal period is provided.</p>
	<ul style="list-style-type: none"> • Is this the complete email list of the people who lodged their concerns? 	<p>Cape EAPrac: No. In our experience, emails sent out to more than 30 recipients invariably result in errors as many people have their email spam set up to prevent multiple emails. As such we send out emails in batches, you can see the evidence of this in Appendix F of the Basic Assessment Report. For a full list of I&APs that were registered at the time of releasing the report, please see Annexure F1. I have included the updated list with this email, this includes people who registered at the public meeting and subsequently. This list will continually be updated up until the final report is submitted to the Department of Environmental Affairs & Development Planning.</p>
	<ul style="list-style-type: none"> • Can you please list the names of all the Afro Fishing directors, paired with their titles 	<p>Cape EAPrac: Afro Fishing has two directors: Mr Johan Breed Ms Shamera Daniels</p>
	<p>What is the closest radius of an Afro Fishing director, living from the proposed fishmeal plant?</p>	<p>Cape EAPrac: Neither of the directors reside in Mossel Bay. The Managing Director, Mr Deon van Zyl does and in close proximity to the harbour.</p>
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>As residents of Mossel Bay (born and bred) we do not support the fish meal factory should any smells arise from it.</p>	<p>Cape EAPrac: Thank you for your participation, your objection is noted.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p>
<p>• We (residents of Mossel Bay) would like to bring life back to the CBD area of Mossel Bay, nasty smells will make it less desirable for residents to live there</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community. While it is a great idea to bring life back to the CBD area, it will go hand-in-hand with an increase in traffic flow with concomitant increase in vehicle emissions in the area that you are trying to revive. Vehicle emissions may not necessarily be odorous (although some are), but have been proven to be harmful to health.</p> <p>MBPS: Refer to SIA section 8: Assessment of impacts, in particular sections 8.3.6 and 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on tourism and property values.</p> <p>Afro Fishing: With the fresh fish to be landed and the RTO unit installed there will be no nasty smells in the CBD. AF support the redevelopment of the CBD.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> • Bringing life / activity back to the CBD is very much in line with European Towns, which Mossel Bay has a hint off, old world charm 	<p>MBPS: Refer to SIA section 8: Assessment of impacts, in particular sections 8.3.6 and 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on tourism and property values.</p> <p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Afro Fishing: We are in agreement with this sentiment and the idea is not to pollute the area with so called 'dirty' practises.</p>

	COMMENT / ISSUES	RESPONSES
25-Mar-19	<ul style="list-style-type: none"> It will have a negative impact on the future Waterfront development - who wants to visit a place that smells 	<p>MPBS: Refer to the mitigation measures proposed to address the probabilities of odours</p> <p>Cape EAPrac: According to the Port Development Plan, all tourist facilities, the so called Waterfront, will be developed on the western side of the port whilst the eastern side will remain commercial fishing and processing.</p> <p>The design and process flow of the proposed fishmeal will not be like any existing fishmeal plants in the country. The introduction of technology that will in all likelihood become the Best Available Technology in a contentious industry should also be seen as an important aspect. It sets aside the port of Mossel Bay as an innovative hub.</p> <p>Afro Fishing: The fish factory will be located in the area allocated to fishing activities within the harbour. The waterfront is planned on the Quay 4 or west side of the harbour which is on the opposite side to Afro Fishing.</p>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> • The walk-way from the Point to Santos will be less desirable - this was a great initiative by the Mossel Bay Municipality 	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant. As a result there is no reason why the walk-way should become any less desirable.</p> <p>AfroFishing: The walkway will not be affected by the activities of Afro Fishing. The current activity does not affect the walkway and likewise the new development will also not affect the walkway.</p>

COMMENT / ISSUES	RESPONSES
<p>We know of a similar scenario at Hout Bay Harbour where they erected a fish meal factory, please see link with comments on TripAdvisor below:</p> <p>https://www.tripadvisor.co.za/ShowTopic-g469392-i9208-k9295404-Fishmeal_Factory-Hout_Bay_Western_Cape.html</p>	<p>LAQS:</p> <p>There are a few references to the fishmeal plant in Hout Bay. However, the plant proposed by Afro Fishing is not similar to the one in Hout Bay as it will operate on state-of-the-art technology. The odour abatement technology that will be used has two key components. Firstly, a custom-designed extraction system extracts air from each part of the process for thermal treatment in the RTO system. This system has been proven to be successful in the destruction of all odorous emissions from fishmeal plants. If the relevant company in Hout Bay were to use the same technology, all odorous emissions will disappear from the site. The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing:</p> <p>The Hout Bay factory is old and does not have a RTO unit. It is not correct to compare this old facility with the new fish meal plant planned for Mossel Bay. This plant will include 'best and proven practises' and modern odour abatement equipment.</p>
<p>Mossel Bay has always been a quaint little town with lots of character and heritage. Please preserve the “Old Town” and rather uplift through initiatives like the walk-way project.</p> <p>We need to protect our town and our heritage.</p>	<p>Afro Fishing:</p> <p>We support this sentiment and have already engaged with the Heritage Committee. We are using local architects and planners exactly for this reason. The intention is to salvage some of the old stone work and to re-use the stone to build a façade that is aesthetically pleasing and fits with the existing Mossel bay heritage and urban design.</p>
<p>Smit, Heinrich- Private</p>	
<p>Registered by Marelize Kapp</p>	<p>Registered 25 March 2019</p>
<p align="center">Background Information Document</p>	
<p align="center">NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	

COMMENT / ISSUES	RESPONSES
<p>The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: Please supply details of the irregularities referred to.</p>

COMMENT / ISSUES		RESPONSES
25-Mar-19	Concerned about the effect of odours on the town.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Cape EAPrac: The Garden Route District Municipality will conduct a baseline odour screening at the harbour. This will provide a starting point to identify in future, any potential problems and their origins. The proposed facility will implement the Best Available Technology to ensure that their impact on the air quality at the port complies with all relevant requirements. Please also note that the other fishmeal facility to which you refer has recently had their license revoked for non compliance. Thus it is a priority of Afro Fishing to ensure that this facility is designed, built and operated at the highest standards.</p>
Smit, Lourens- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>		

COMMENT / ISSUES		RESPONSES
25-Mar-19	Possible irregularities by state officials who issue licenses should be investigated.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: Please supply details of the irregularities referred to.</p>
		<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using emission factors published by the United States of America's Environmental Protection Agency (USEPA), shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES		RESPONSES
	Concerned about the pollution effect on Mossel Bay, the environment and sea life as well as residents and visitors.	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: There will be no pollution from this modern plant. The community and sea environment will not be harmed.</p>
Smit, F - Private		
	Registered via email	Registered 9 December 2019
Draft Basic Assessment		
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>		
	It's going to do a lot of damage to our beautiful town ... The constant unpleasant smell will totally discourage tourists from coming here, and the businesses that are already on shaky legs will inflict further financial losses.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES		RESPONSES
	We need infrastructure that stimulates the economy ... does not ultimately destroy it.	MPBS: Although Afro Fishing will only need one new 11 kV cable, the project will pay for a second cable to cater for further developments in the precinct and to improve the stability of the electricity supply ring in Mossel Bay.
	Please come to your senses and realize the importance of this decision.	
Smit, Bethe - Afro Fishing employee		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Spies, Herman - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Steenkamp, Rina - Private		
	Registered as I&AP	Registered 12 December 2019
Draft Basic Assessment		
	I, MC Steenkamp, is against the above mentioned development for the next reasons, no marine impact study was concluded or taking into consideration . Points to consider:	Cape EAPrac: Thank you for your participation in this EIA process.
	Increase heavy vehicle traffic	Urban Engineering Road pavements are designed according to an equivalent E80 axle load. The actual maximum vehicle axle load is governed by legislation. No vehicles are allowed to exceed the maximum axle load used in the structural design of the road pavement. A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.
	Increase noise levels from trucks and additional fishing boats to bring in a 1000 fish/day	Afro Fishing: The noise level of the new fish meal plant will be less than that of the current cannery operation. The building will also be a sealed unit preventing the even lower level of noise to dissipate. The factory will be located in the designated fishing area of the port where industrial activities are approved. Please note that although the plant is designed for 1000tpd, it will probably only secure about 30,000tpa of quota. So if the boats were able to land 1000 tpd this plant will only produce for 30 days.

COMMENT / ISSUES		RESPONSES
12-Dec-19	No proper access roads	Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation and traffic distribution.
	No save parking for trucks in Mosselbay	Urban Engineering Ample truck parking is provided within the site. No reason for trucks to park outside the property.
	Increase air pollution	LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.

COMMENT / ISSUES	RESPONSES
<p>The EIA report is based on assumptions</p>	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>
<p>No actual airflow tests were done</p>	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>
<p>I am a resident in High Street, just above the harbour since 2002.</p>	
<p>Steenkamp, JA - Private</p>	
<p>Registered as I&AP</p>	<p>Registered 12 December 2019</p>
<p>Draft Basic Assessment</p>	

COMMENT / ISSUES	RESPONSES
I, JA Steenkamp, ID 5201315018084, is against the above development for the next reasons, no marine impact study was concluded or taking into consideration . Points to consider:	
. Increase heavy vehicle traffic	<p>Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation and traffic distribution.</p>
. Increase noise levels from trucks and additional fishing boats to bring in a 1000 fish/day	<p>Afro Fishing: The noise level of the new fish meal plant will be less than that of the current cannery operation. The building will also be a sealed unit preventing the even lower level of noise to dissipate. The factory will be located in the designated fishing area of the port where industrial activities are approved. Please note that although the plant is designed for 1000tpd, it will probably only secure about 30,000tpa of quota. So if the boats were able to land 1000 tpd this plant will only produce for 30 days.</p>
No proper access roads	<p>Urban Engineering Please refer to the Traffic Impact Study</p>
No save parking for trucks in Mosselbay .	<p>Urban Engineering Ample truck parking is provided within the site. No reason for trucks to park outside the property.</p>

COMMENT / ISSUES		RESPONSES
12-Dec-19	Increase air pollution	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>
	The EIA report is based on assumptions	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>

COMMENT / ISSUES		RESPONSES
	No actual airflow tests were done	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p>
Stemmet, Gabriel - Private		
	Registered via email	Registered 18 March 2019
Background Information Document		
	Odour problems emanating from fish offal impinges on Constitutional right to clean air.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: The emissions will comply with all air pollution limits and thresholds so no persons constitutional right will be violated.</p>

COMMENT / ISSUES		RESPONSES
18-Mar-19	Strong possibility of sea water pollution in the harbour area.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: No water with pollutants will be pumped into the harbour so this is also not a risk.</p>

COMMENT / ISSUES		RESPONSES
	Propose that they establish facility for these purposes in a remote area far from communities.	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows:</p> <ul style="list-style-type: none"> - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater. <p>The harbour precinct provides for operational fishing industries and as such is not a residential area.</p> <p>Afro Fishing: The non viability of this has been explained above.</p>
Steyn, Gerald - Private		
	Registered via email	Registered 13 December 2019
Comment submitted to Mossel Bay Municipality		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		
	As residents of the lower town of Mossel Bay, my wife and I would like to object to the establishment of a fishmeal factory in Mossel Bay on the following grounds:	
	Mossel Bay recently received the award Town of the Year. Our wonderful municipality and residents have strived for years to make Mossel Bay an attraction for tourists and as a holiday destination. With this proposal this will no longer be the case. The people will no longer come. You can just imagine what kind of financial loss this will be for the town, shop owners, restaurants, b&bs etc.	<p>MPBS: Mossel Bay can't only rely on Tourism for economic growth and also need to grow other sectors. The proposed development will contribute to various sectors, including Construction, Agriculture & Fishing, Goods & Services. Furthermore, the proposed development entails an expansion of current activities, not the development of a completely new industry.</p>

COMMENT / ISSUES	RESPONSES
<p>The value of residential and commercial properties will drop. Who will compensate the owners for the devaluation? Who would want to buy a property near a fishmeal facility that stinks or have a view over a fishmeal facility? You won't be able to even sell your property.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

COMMENT / ISSUES	RESPONSES
<p>What will the facility do regarding the odour and the tons of waste it will generate? We are concerned that the existing regulations are not sufficient for this.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Cape EAPrac: The fishmeal facility will make use of all its products as such there will be no waste from the facility. There will be discharge from the existing cannery to which additional seawater will be added. The facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Afro Fishing: The odour will be managed by installing a modern fish meal plant with 'best proven' odour abatement technology (i.e. RTO). This is not an installation of old as happened on the west coast. There will no waste from this facility.</p>

COMMENT / ISSUES		RESPONSES
	<p>Passenger ships are dropping anchor more often in Mossel Bay. If the facility goes ahead then they won't come in the bay .</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: The growth of the MB economy by the authorisation of this project will not stop passenger liners from coming into the bay. In fact, Afro Fishing supports the Portnet strategy to upgrade the port so that passenger liners can dock so that all the passengers can disembark and enjoy the town of Mossel Bay.</p>
	<p>If the fishmeal facility goes ahead it will mean that Mossel Bay will decline. Property values will drop and residents will not be able to maintain their properties. Properties will become derelict and that leads to poverty and crime. As residents we must keep working towards attracting tourists and as a holiday destination.</p>	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>
Stratu, Monde - Garden Route District Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Struwig, Marietjie - Private		
	Automatically registered as an I&AP.	Registered 26 February 2019
Background Information Document		
26-Feb-19	<p>Afro fishing factory will have a negative effect to our 2 properties we have in the area. at this stage we have problems with fish transport vehicles driving up Kloof street leaving a path of stinking fish water behind. we have contacted the municipality and traffic department and only traffic tries to do something. it stinks and in the warm summer days it is even worse we have to live her not hiring or use properties as holidays houses but bought them and live here every day</p>	<p>Cape EAPrac: Afro Fishing do not nor will they be transporting wet (raw) fish and as such no leakage will take place.</p>

COMMENT / ISSUES		RESPONSES
Strydom, Marius - Private		
	Registered via email	Registered 23 November 2019
Draft Basic Assessment		
23-Nov-19	I hereby would like to register as a resident of Mossel Bay and therefor an interested party. I live close to the harbour	<p>Cape EAPrac: Thank you for your email and I confirm that I have registered you as an Interested & Affected Party for the Environmental Impact Assessment process.</p>
	I am not satisfied with the answer from the role players regarding the air pollution (smell omittance), purely stating that they will implement top quality technology does not answer the question.	<p>Cape EAPrac: Your concerns regarding odour are duly noted and will be included in the final Basic Assessment Report. Please note though, that the actual measurements of the existing plants, as well as the very conservative assessment undertaken by LAQS shows that the odour abatement proposed for the plant will be effective in the management of the odours.</p> <p>I will provide this comment to LAQS for any further responses which will be included in the updated Comments & Responses Report which will be circulated after the closing date for comment.</p>
	I for one be happy if they can guarantee us that there will be NO smell due to the fish process plant.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: There will be no offensive odours. The Atmospheric Emissions License (AEL) will stipulate conditions in this regard that will have to be met.</p>
Strydom, Rina - Private		
	Registered via email	Registered 9 December 2019
Comment submitted to Mossel Bay Municipality		

COMMENT / ISSUES		RESPONSES
09-Dec-19	With reference to the international scandal regarding fishing quotas, I would like to advise the municipality to stay as far as possible away from these plans. No mess of this kind will be tolerated by the residents of this area.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: Afro Fishing is not linked to any fishing scandal. Yes the 'Mosselbayontheline' FB page has insinuated this but AF strongly denies the alleged involvement.</p>
Swanepoel, Elise - Private		
	Registered via email	Registered 26 February 2019
Background Information Document		
	Bad odours.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Afro Fishing: The RTO plant will process bad odours.</p>

COMMENT / ISSUES	RESPONSES
Uncontrolled emissions.	<p>LAQS: Because the proposed plant will produce fishmeal which is not destined for human consumption, the process is included in the List of Activities that Result in Atmospheric Emissions as published in Government Notice 893 of November 2013 (as amended). The process falls under Category 10: Animal matter processing, but no emission limits have been defined for such processes. The only legislative statement made is that "best practice measures intended to minimise or avoid offensive odours must be implemented by all installations". The planned plant design and use of RTO technology is the current best practise technology and complies fully with European emission limits for such installations</p> <p>Afro Fishing: All emissions will be controlled and regulated by the Atmospheric Emission License conditions. All emissions will therefore have to be treated to ensure compliance with these regulations.</p>

	COMMENT / ISSUES	RESPONSES
26-Feb-19	Contamination of seawater - boiling blood water.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>Afro Fishing: Blood water will be processed and not discharged from the factory. An important aspect of a fish meal plant is that all the raw materials are processed to achieve maximum protein collection. There is thus no offal. The existing cannery has some offal and this has been disposed of for 13 years without any threats to the environment or persons.</p>
	Uncontrolled storage of stickwater in pits.	<p>Afro Fishing: This factory will not have fish pits. Stikwater will be stored in a tank and processed immediately. No stickwater or bloodwater will be dumped.</p>

COMMENT / ISSUES	RESPONSES
<p>Mossel Bay is fighting to stay an unpolluted bay with a healthy marine life. A fishmeal factory will destroy our environment and will not be odourless.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: As noted above there will be no pollutants into the bay so there will be no harm done to the local marine environment.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
Swanepoel, Deidre - Community Police Forum	
Registered via email	Registered 25 February 2019
Background Information Document	

	COMMENT / ISSUES	RESPONSES
	<p>Crime and heightened criminal activity in the harbour and Central Business District.</p>	<p>MPBS: The impact of crime has been addressed as an impact in the Socio-economic Impact Assessment.</p> <p>Afro Fishing: The investment and the provision of labour opportunities will actually decrease crime activity. Both the harbour and Afro Fishing's factories are protected with CCTV systems and 24 x 7 security.</p> <p>Afro Fishing is also a proud level 1 B-BEEE contributor so we are investing vast sums into the local economy to support local initiatives, social investment schemes, small enterprise development projects, developing skills through learnerships and internships, etc. All this already helps reduce crime and to spur employment opportunities.</p>
25-Feb-19	<p>CPF represents about 40 different organisations / forums in the SAPS station area. Not only crime related issues are discussed but any matters causing a threat / violation positive / negative.</p>	<p>MPBS: Co-operation between the Developer and SAPS is essential to ensure that the area around the proposed development remains secured during construction. The movement of people should be monitored and effective security measures should be implemented, such as perimeter fencing, controlled access and security guards. TNPA applies strict access control to the Port Limits, which will add a high level of security during the construction phase.</p> <p>Afro Fishing: We trust that the role of the CPF will continue as it is in the interests and safety of the community that such forums function efficiently.</p>

COMMENT / ISSUES	RESPONSES
<p>Suggest Mossdustria as an alternative. Controlled and correctly zoned. Industry grouped there already.</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The harbour precinct provides for operational fishing industries and as such is not a residential area.</p> <p>Afro Fishing: As discussed above, fish is harvested in the ocean and the fishing vessels require a harbour in which to offload their catch. For this reason, the processing facility is located alongside the offloading quay within the harbour.</p>
Swart, Engela - Private	
Automatically registered as an I&AP.	Registered 25 February 2019
Swartbooi, Bongani - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Thomatos, Marika - Munro Manor	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Tshikalange, Shadrack - TNPA	
Automatically registered as an I&AP.	Registered 22 February 2019
Van den Berg, Henlo - Private	
Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document	

COMMENT / ISSUES		RESPONSES
25-Mar-19	Local and district municipality - possible double standards.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: Please supply details of the irregularities referred to.</p>
	Cares too much about the fish in the sea.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: The various fisheries are regulated by DAFF and other government departments with the aim of preventing over fishing, etc.</p>
Van der Elst, Rudy - Private		
	Registered via email	Registered 26 February 2019
Draft Basic Assessment		
	<p>I do understand that the reporting period closed last week. However, I have just read through the document again – as well as the Comments and Responses report. Clearly there is a huge amount of concern, which makes implementation of the project problematic.</p>	<p>Cape EAPrac: Thank you for your comments. I will include them in the final Comment report. Please note that the Re-generative Thermal Oxidation (RTO) technology that is being proposed was indeed identified for other fishmeal plants in the EU and has found to be the best available technology for odour control and management.</p> <p>There will be additional responses to your other suggestions in the final Comments and Responses report. Thank you for taking the time to review the documents and submit comment.</p>

COMMENT / ISSUES		RESPONSES
17-Dec-19	Recognising that the processing of the fish is an important social and economic activity I would suggest that a compromise may be possible as follows.	
	1. Identify a similar operation in another country which uses the same high temperature process.	<p>Cape EAPrac: This was undertaken and a visit to the facilities in Spain and Portugal respectively took place. The facilities themselves were visited and a survey was done in tourist areas in the immediate vicinity of the facilities.</p> <p>Afro Fishing: All fish meal plants use approximately the same cooking and drying temperatures. There is nothing extra ordinary about this installation from a process engineering perspective.</p>
	2. Promote a public message that existing operations can be acceptable – as seen at {operations x} provide details.	<p>Cape EAPrac: All the information obtained from the facilities visited as well as the assessments done for this plant have been extensively distributed to the public.</p>
	3. Establish a pre-condition that if another operation can meet standards and conditions – then Mossel Bay can go ahead.	<p>Cape EAPrac: As far as LAQS's knowledge goes, the TMA emission limit defined in some European countries is 5 mg/m³. As a result of the outcome of the air quality impact assessment, which was based on emission measurements conducted on two similar plants in Europe, LAQS concluded that the concentration of TMA must be as high as 5.5 mg/m³ before odours will be detectable in the area surrounding the proposed plant. Nevertheless, LAQS supports the recommendation that the emission limit for TMA be set at 1 mg/m³, i.e. five time lower than in Europe. At that level LAQS is confident that no odours will be detectable in the area surrounding the factory.</p>
	4. Assemble a team of (say) three; yourself plus two from the IAAP's	<p>Cape EAPrac: This was undertaken to the facilities in Spain and Portugal respectively. The team was made up of myself, the air quality specialist and a professional journalist.</p>
5. Visit the facility and conduct a brief door-to-door [or other type] opinion survey of surrounding residents. (use a local consultant?)	<p>Cape EAPrac: This was undertaken to the facilities in Spain and Portugal respectively. The facilities themselves were visited and a survey was done in tourist areas in the immediate vicinity of the facilities. This was done by a professional journalist accompanying the task team.</p>	

COMMENT / ISSUES		RESPONSES
6. If results are objective and positive then go ahead.		Cape EAPrac: The results from the existing facilities along with the models done by LAQS show that the impact will be Very Low.
Apologies for this late response. It will cost some cash, but it would be the way I would deal with it.		Cape EAPrac: Thank you for your participation in this EIA process.
Background Information Document		
The impact of air quality, which is difficult to measure ;		LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant. Afro Fishing: Correct, air quality has always been difficult to measure. It is for this reason that stringent licensing procedures are in place.
the difficulty of maintaining high long-term operational standards;		Afro Fishing: Operational standards normally improve over time as regulations become more stringent. LAQS: Agrees with Afro Fishing's statement. An added benefit of long-term operation is that plant operators and supervisors become more familiar with the plant, making fault diagnosis and preventative maintenance more effective.

COMMENT / ISSUES		RESPONSES
26-Feb-19	the problems associated with marine waste discharge which is not adequately noted.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: As noted above there will be no pollutants into the bay so there will be no harm done to the local marine environment.</p>
	I am a semi-retired marine biologist; I am the environmental trustee for the village on sea eco-estate.	<p>Afro Fishing: We note your background and role in the community. We would like to extend an invitation to visit the cannery.</p>

COMMENT / ISSUES	RESPONSES
<p>Suggest a more industrial zone is considered such as Mossdustria</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The harbour precinct provides for operational fishing industries and as such is not a residential area.</p> <p>Afro Fishing: The non viability of this has been explained above.</p>
Van der Gryp, Gerhardt - Private	
Registered via email	Registered 2 December 2019
Draft Basic Assessment	
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.	
<p>We are property owners in Mossel Bay and also own a vacation unit at Beacon Wharf, which is in Kloof Street which borders the port gate no. 3. Due to the location of our property, we will be directly affected by the fish factory, not only with the concerns below, but also by the depreciation of the property.</p>	
Attached please also find our concerns regarding the planned Fish Factory;	
<p>1. Property's value that is adversely affected. (especially residential property near the factory)</p>	<p>MPBS: Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

COMMENT / ISSUES	RESPONSES
<p>2. The waste that is pumped back into the sea in front of our apartment blocks.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: No water with pollutants will be pumped into the harbour so this is also not a risk.</p>
<p>3. Odours and air pollution in our immediate surroundings.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H₂S and maximum allowed emissions of PM₁₀ particulates, SO₂ and NO₂, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES	RESPONSES
<p>4. Fish and marine life that has already decreased tremendously, and will now become even more exhausted and damaged as a result of the devastation that "Trawler" boats are doing to marine life and seabed.</p>	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Certain species of pelagic fish are not suitable for human consumption for several reasons. For example, anchovy is small and oily and not conducive to filleting and processing for human consumption. This type of fish is in abundance in SA waters and therefore harvested for reduction into fish meal and fish oil. Fish meal is sold into the animal feed industry and fish oil mainly used for human consumption. The fish is caught at night because they mainly feed and shoal at night.</p>
<p>5. Increasing Noise at residential property (especially in Kloof Street) where this is already a problem.</p>	<p>Cape EAPrac: Please remember that the Port of Mossel Bay is a working harbour that is home to many different industries. It must be noted that even if this project is not approved, the harbour will not cease to be an industrial and commercial hub.</p> <p>Afro Fishing: The noise level of the new fish meal plant will be less than that of the current cannery operation. The building will also be a sealed unit preventing the even lower level of noise to dissipate. The factory will be located in the designated fishing area of the port where industrial activities are approved.</p>

ec-19

	COMMENT / ISSUES	RESPONSES
02-D	6. Tourism that will be affected by this, especially the tourists and locals who like to walk or jog on the seafront daily before Beacon Wharf to the Point.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant. It must be borne in mind that a fishmeal factory is operational in Cape Town harbour, in sight of the major Waterfront tourist attractions, and it does not seem to affect tourist numbers at all. After all, like Cape Town, Mossel Bay's harbour is a working port.</p>
	7. That it is not really going to be a financial gain for the municipality and town, if the fish factory is not set up properly and especially managed correctly.	<p>Afro Fishing: I agree with this sentiment, hence permit conditions will have to be met by Afro Fishing.</p>
	8. Are not the same people involved in the Namibian corruption scandal?	<p>Afro Fishing: Afro Fishing is not linked to any fishing scandal. Yes the 'Mosselbayontheline' FB page has insinuated this but AF strongly denies these allegations. A press statement will be made in this regard in the New Year.</p>
	Should this project continue, the following must be guaranteed;	
	1. That no air pollutants, or odours will be released, or pollution of the sea or no waste will be pumped into the sea in front of the apartment units.	<p>Afro Fishing: Correct</p>
	2. That the fish factory will make use of our local labour and will not employ other foreign workers who will take local people's work, thus increasing the crime here.	<p>Cape EAPrac: This is also a recommendation from the Socio-Economic specialist.</p> <p>Afro Fishing: It is the policy of Afro Fishing to employ local labour. Our B-BEEE projects are also all locally or Eden District based.</p>
	3. That the factory workers will be switched on and off during the shift within the port premises, and not outside gate no 3 in Gorge Street, and the noise of the workers and taxis will be controlled so that it will not disturb Beacon Wharf's owners and holidaymakers at Port Gate 3, as well as at other residential sites in the area.	<p>Afro Fishing: These matters will be better managed in future. Alternative taxi drop off and collection points will be investigated.</p>

COMMENT / ISSUES	RESPONSES
4. The equipment and machinery used in the factory will also not be a noise and disturbance to residential property in the area.	<p>Afro Fishing: The plant will be enclosed and noisy equipment will be insulated. Noise is not expected to exceed current harbour levels.</p>
5. That a proper governing body / Forum be established from interested persons, who will see to it that there are no deviations from the presentation of the fishery as stated on the meeting of November 20, 2019, nor of the presentation made there.	<p>Cape EAPrac: We strongly support the establishment of a Monitoring Forum, as does the Socio-Economic specialist. We have requested that this is made a condition of any authorisation, if issue.</p> <p>Afro Fishing: I once participated in a similar forum or action group in Mossel Bay. Such a group can certainly be implemented.</p>
6. These persons / organizations / Forum should consist of local persons, institutions and authorities directly interested in the matter, namely, Home Owners, Business Owners, Tourism organization, Municipality, Civil Rights members, Environmentalist, and an employee or representative of Afro Fishing, but none of the management or CEO or owners.	<p>Afro Fishing: I am in agreement with this proposal.</p>
7. This Forum must have the right to visit the factory at any time during the erection, as well as after the plant is built and in production, to ensure that the erection of the building and equipment is erected as per the above submission, and that the device / equipment functions correctly as per the above submission, without noise, pollution etc.	<p>Cape EAPrac: We strongly support this suggestion.</p> <p>Afro Fishing: Visits can be arranged providing Health and Safety and General Machinery Regulations are abided by.</p>
8. The Forum must have the power to compel the management of Afro Fishing to make immediate corrections, if any part of the plant does not comply with the proposal and specifications, does not function, and The Forum must also have the right and power to act, if excessive noise, odours, air pollution of the sea occur or not according to the submission and, if the corrections do not take place immediately, the Forum must have the right and power to stop the plant immediately.	<p>Cape EAPrac: The value of having authorities on such forum will allow for this kind of oversight.</p> <p>Afro Fishing: Such power is difficult in the hands of private individuals or forums. For example, if a pub is noisy in Marsh Street, it would be prudent to get the authorities (police) to deal with the problem. Such a forum can make recommendations to the authorities based on their findings and suitable measures can be enforced by the authorities.</p>

Van der Merwe, Werner - Private

Registered via email

Registered 11 December 2019

COMMENT / ISSUES		RESPONSES
11-Dec-19	If you want to make a very unhappy citizen of me you should allow this fish factory to be opened. Please stop this!	<p>Cape EAPrac: Thank you very much for your email. I have registered you as an Interested & Affected Party (I&AP) for the Environmental Impact Assessment process. This will ensure that you receive all future correspondence relating to this application.</p> <p>All comments are being collated and responses will be provided in due course. The updated Comments & Responses table will be circulated to all registered I&APs early in the new year.</p> <p>Please feel free to review all available documentation on the website link.</p>
Van der Merwe, Lizi-Marie - Private		
	Registered as an I&AP at public meeting / information session	Registered 20 November 2019
Van der Walt, Adel - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		
5-Mar-19	Possible pollution of sea in the vicinity of the harbour.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: There will be no discharges of a polluting nature. This is why there are Coastal Discharge Permits. They are there to regulate all discharges.</p>

COMMENT / ISSUES		RESPONSES
25	Attracting of flies to the CBD as well as bad odours affecting the town and tourism.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Afro Fishing: Odours will be controlled using RTO technology and emissions will comply with licensing conditions. There will be zero increase in the fly populations in Mossel Bay.</p>
Van der Walt, Lucretia - Private		
	Registered as an I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
	Herewith my comments & concerns:	
	1. AF (Afro Fishing) obtains fish from companies that have legal quotas allocated to them. Does that mean our local fishing trawlers/community are the holders of these quota's or will other foreign trawlers (and larger vessels/fishing fleets) be catching & off-loading in our harbour?	<p>Afro Fishing: Fish landings will comprise both local and other rightsholders. No foreign vessels will land to Afro Fishing.</p>

COMMENT / ISSUES	RESPONSES
<p>2. At a max number of 1000tons raw fish a day – does this mean many more trawlers or just larger vessels? Please identify the details of fishing fleets, quantity & noise levels in the protected bay and increased on & off-loading in the harbour.</p>	<p>Afro Fishing: The design capacity is 1000 t.p.d to cater for the very good fishing nights. These may only comprise 20-30 fishing nights in the year. For the rest of the season boats bring in what they can find. A large pelagic trawl vessel can catch 600 tons +. The smaller purse seine trawlers can catch 100-250 tons. We therefore envisage a scenario of about 3-5 fishing vessels servicing the factory.</p> <p>There is already that many and more fishing vessels servicing the cannery when there is fish caught in Mossel Bay waters. The Port of Mossel Bay has a major fishing component and hence it is normal for trawlers to be productive in the harbour. This is actually good for the economy as fishing crews must be paid, local service/maintenance companies benefit and the harbour is better utilised. Diesel is purchased, etc. Currently the harbour is at best 20% utilised. The Portnet strategy is to increase this utilisation factor.</p> <p>Noise will be controlled and most trawlers will anyhow offload during the day.</p>
<p>3. Who will monitor the quality of nets, bycatch data and unsustainable practices? Will this be made public?</p>	<p>Cape EAPrac: The Department of Environment, Forestry & Fisheries (DEFF) Directorate: Fisheries has inspectors at all harbours to monitor compliance.</p> <p>Afro Fishing: The Department of Fisheries and the scientific working groups ensure that quotas are sustainably managed.</p>
<p>4. How far off the coast will they catch these / Average distance from our coast?</p>	<p>Afro Fishing: Pelagic species are mostly caught within the confines of the continental shelf. The fishing area can extend 200miles east and west of Mossel Bay and 80 miles out to sea.</p>
<p>5. What prevents AF from buying in frozen fish from elsewhere or double up on canning or obtaining more fishing quota's in the near future?</p>	<p>Afro Fishing: Afro Fishing can process as much pilchard as the plant is capable of canning. Currently the cannery can process about 200 tpd. There are however no plans to increase the canning capacity of Afro Fishing.</p>

	COMMENT / ISSUES	RESPONSES
12-Dec-19	<p>6. The traffic impact study does not allow for more road traffic and the noise levels of these heavy vehicles coming in from George Road (Santos) – sometimes at 4'o clock in the morning. Heavy vehicles should also not be allowed to use the corner of Church & George Road.</p>	<p>Urban Engineering The trip generation and envisaged increase in traffic volumes is described in detail in the Traffic Impact Study. Noise pollution is not included in the scope of services of a traffic impact study, but the anticipated noise pollution levels should be within the parameters for a facility is located within a working harbour.</p>
	<p>7. The negative impact of a fishmeal factory & industrial smelling harbour will have a long term effect on the tourism industry that are very much aware what individual countries & regions (and towns) are doing to protect their vulnerable habitats, oceans & animals. Tourist are looking for more accountability from countries, authorities and town planners!</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant. It must be borne in mind that a fishmeal factory is operational in Cape Town harbour, in sight of the major Waterfront tourist attractions, and it does not seem to affect tourist numbers at all. After all, like Cape Town, Mossel Bay's harbour is a working port.</p>
	<p>8. The Municipal authorities should not allow any new addition, building or warehouse in the harbour without it being a Green building, indicating the energy savings including water & electricity, starting from the construction phase.</p>	<p>Cape EAPrac: Please refer to the Services Reports (electrical and services) for details on resource management as part of the building requirements.</p> <p>Afro Fishing: This is standard procedure. Energy calculations need to be done even for residential buildings. Our aim is however to install 1MW of solar energy and to install some stone walls to fit in with the heritage of Mossel Bay.</p>

COMMENT / ISSUES	RESPONSES
<p>9. What will the energy constraints of AF be on our clean tap water? It will use huge amounts of water for cleaning, cooking, cooling, freezing, sanitization and floor washing. How much of this polluted water will run off into the ocean?</p>	<p>Cape EAPrac: A Services Report was included as Annexure G6 of the Basic Assessment Report.</p> <p>Based on the requirements provided by Afro Fishing, it is estimated that the fresh water demand that will be required for process- and domestic usage are as follows:</p> <p>i) During production: a) Plant - 290 kℓ/ day b) Cleaning purposes one to three times per week - 50 kℓ per cleaning c) Max. daily demand - 340 kℓ/day - 3,94 ℓ/s</p> <p>Potable water is supplied to the existing Afro Fishing facility and was supplied to the old I&J facilities via existing connections to the Municipal network in Bland Street. (See Annexure A). No upgrade of these connections are envisaged.</p> <p>The Mossel Bay Municipality confirmed that enough water is available in their existing water system.</p>
<p>10. The comment of Mr Deon van Zyl (AF) on the current population of small pelagic fish species in the ocean – “ they are a short lived specie and if we do not catch them, they will die” is of great concern. These fish species form the foundation of the ecosystem food chain and keep our dolphins close to our coast. How can it be allowed that AF remove vast quantities of a critical component of the region’s ecosystem from our waters and turning it into an end product that is almost worthless for us. Two endemic and vulnerable seabirds, the African penguin (Spheniscus demersus) and the Cape gannet (Morus capensis) feed primarily on sardine and anchovy, both of which are targeted by AF.</p>	<p>Afro Fishing: I am not a scientist in this regard so I am quoting official publications. This is the reason why quotas are issued. Obviously all of the biomass is not allowed to be caught for precisely the reason you mention. Enough of each specie must not be harvested so that the ecosystem is not affected in any way. It is my understanding that depending on the conditions and the results of the operational management models only 10-20% of a pelagic specie is allowed to be caught. When the biomass is low, then even less or no catch is allowed precisely for the reasons you mention.</p>
<p>11. Where will this product (fishmeal) end up? For aquaculture practices in China, Angola??</p>	<p>Afro Fishing: Fish meal is used for the production of agriculture and aquaculture feed. The main markets are in Europe, North America, Asia and China.</p>

COMMENT / ISSUES		RESPONSES
	The authorities, town planners & political parties in Mossel Bay should take note of climate change and long term environmental impacts and should consider the no-go option in this matter.	Cape EAPrac: Thank you for your participation in this EIA process.
Van der Walt, Petrus - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
25-Mar-19	Possibilities of pollution.	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: There will be no pollution from this modern plant. The community and sea environment will not be harmed.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES		RESPONSES
	The effect of smell in the centre of Mossel Bay towards the tourism industry as well as the local businesses.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>MPBS: Odours are addressed as an impact in the socio-economic impact assessment and the effect on the sense of place.</p> <p>Afro Fishing: The aim is to eliminate odours using best practise technologies. There will be negligible smell in the centre of town and no impact on the local tourism industry.</p>
Van der Walt, Sonja - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
	NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.	
25-Mar-19	Possible irregularities by state officials who issue licenses should be investigated.	<p>Cape EAPrac: Concerns regarding double standards, negligence or wrongdoing on the part of the authorities should be taken up with them directly or via any other mandated watchdog authority. This EIA process is not the correct platform to address such accusations.</p> <p>Afro Fishing: Please supply details of the irregularities referred to. There should be other forums to address these allegations.</p>
	Concern about the double standards in the municipality.	Same as above, this is not the forum to address allegations of this nature.

COMMENT / ISSUES	RESPONSES
Van Dyk, Leon - Bo-Dorp Neighbourhood Watch	
Registered via email	Registered 25 February 2019
Draft Basic Assessment	
Herewith some comments to be included before the 12th.	
I refer to the said PP document and refer to one of the points under Environmental concerns (from page 140 onwards), which I believe has been answered without any scientific back up or value by a mere statement/ qualification. No pollution is impossible.....	
<p>1) Will a Marine study be conducted? It is not possible to relate if there is no base of testing? Also after your comment I have asked some additional questions to be added:</p>	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Afro Fishing: The basis for this project is precisely that the scientists and Department of Fisheries is arguing that there is vast quantities of pelagic species in the southern cape waters which are not being harvested.</p>
<p>2) Would also like to know if there is a basic personnel organogram available as well as a basic process flow diagram of the activities within the factory.</p>	<p>Cape EAPrac: There is a full process flow diagram in the Air Quality Impact Assessment Report. It was also included in the copy of the presentations that was provided to all I&APs.</p> <p>Afro Fishing: Afro Fishing has a personnel organogram and process flow diagrams. There is a flow diagram for the proposed fish meal plant in the application data pack.</p>

COMMENT / ISSUES		RESPONSES
04-Dec-19	3) The investment value and the qualification thereof can that be broken up in different categories e.g. buildings, plant etc.?	Afro Fishing: Yes, there is already a detailed QS document and project breakdown showing the different expense categories.
	4) The job opportunities are they permanent or seasonal?	Afro Fishing: The job categories are both permanent and seasonal workers.
	5) If the plant is so advanced what is ratio skilled labour needed versus unskilled?	Afro Fishing: The plant is advanced as there is some technology that will be used for a first time in SA. The technology is well used abroad and just the one supplier has over 2000 reference sites. All the plant operators and supervisors will have to have technical and processing skills, so the ratio of skilled staff will be high in the plant. The boat offloading, fish meal bagging and container loading staff need not be skilled. The ratio will be about 40% skilled.
	6) The tonnage will be scaled - up can you advise where the origin of fish will be from e.g. local waters/ other countries and if so, what are the proportionate quotas to be imported?	Afro Fishing: The fish will be caught locally in the southern and eastern cape waters.

COMMENT / ISSUES	RESPONSES
<p>7) Will a traffic study be done as roads to and from the harbour is already congested?</p>	<p>Cape EAPrac: A Traffic Impact Assessment was undertaken by Urban Engineering and is available in the Draft BAR. The assessment indicated that the impacts will be Very Low.</p> <p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: An assessment will be made in this regard. In the long term however, all the finished product will be exported directly from the Port of Mossel Bay. Transnet long term planning allows for the port to load shipping lines as opposed to having to road freight containers to Coega or Cape Town harbours for export.</p>
<p>You can include these comments either under the CPF/ the Bo Dorp NHW</p>	<p>Cape EAPrac: Thank you for your participation in the EIA process.</p>
<p>Background Information Document</p>	

COMMENT / ISSUES	RESPONSES
Safety & security	<p>MPBS: Co-operation between the Developer and SAPS is essential to ensure that the area around the proposed development remains secured during construction. The movement of people should be monitored and effective security measures should be implemented, such as perimeter fencing, controlled access and security guards. TNPA applies strict access control to the Port Limits, which will add a high level of security during the construction phase.</p> <p>Afro Fishing: The investment and the provision of labour opportunities will actually decrease crime activity. Both the harbour and Afro Fishing's factories are protected with CCTV systems and 24 x 7 security.</p>
Traffic congestion	<p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network.</p> <p>The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p>

COMMENT / ISSUES	RESPONSES
Environmental concerns	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility.</p> <p>Afro Fishing: There will be no pollution from this modern plant. The community and sea environment will not be harmed.</p> <hr/> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>
Potential devaluation of property values	<p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.7: if the proposed mitigation measures are implemented, there should be very little (if any) negative impact on property values.</p>

COMMENT / ISSUES	RESPONSES
Effluent control	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>An amendment to the existing permit will be applied for once the EIA process is completed.</p>
Emission control	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Because the proposed plant will produce fishmeal which is not destined for human consumption, the process is included in the List of Activities that Result in Atmospheric Emissions as published in Government Notice 893 of November 2013 (as amended). The process falls under Category 10: Animal matter processing, but no emission limits have been defined for such processes. The only legislative statement made is that "best practice measures intended to minimise or avoid offensive odours must be implemented by all installations". The planned plant design and use of RTO technology is the current best practise technology and complies fully with European emission limits for such installations.</p>

COMMENT / ISSUES		RESPONSES
25-Feb-19	Disruption of tourist and holiday trade	<p>Cape EAPrac:</p> <p>Due to the nature of the pelagic fishing industry and the mechanism employed by the Fisheries Directorate in issuing quotas and licenses, as well as allowing for environmental resting periods, the cannery and the proposed fishmeal and oil facility will not operate from mid December to end of January. This eliminates further, any possible disruptions to peak tourist and holiday trade.</p>
	Would like to see process flow & studies of similar facilities	<p>Cape EAPrac:</p> <p>Please refer to the Air Quality Impact Assessment included in the Draft BAR for detailed process flow. The technology that is being proposed is the same as that being implemented in several European fishing towns and has been shown to be very successful in addressing odour.</p>
	The NHW represents an area with 524 homes and approx. 3500 inhabitants. The NHW does not only focus on safety issues but also on aspects and impacts that may have an influence.	<p>Cape EAPrac:</p> <p>Thank you for your participation.</p>
	Wind direction and location of suburbs directly adjacent to the proposed activity are a concern.	<p>LAQS:</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Air pollutants emitted from a source disperses into the atmosphere, the degree of which is determined by prevailing weather conditions. Wind direction dictates in which direction dispersion occurs while other parameters, e.g. wind speed, air temperature, solar radiation, upper-air stability, etc., determines the degree of dispersion that occurs. Generally, the worst dispersion conditions occur under very stable air conditions, usually manifested early in the morning during incidents of virtually no wind. Emissions then tend to stay fairly concentrated with maximum ground-level concentrations occurring in the immediate vicinity of the source. Even under such conditions the dispersion model does not predict any discernible odours in the area.</p>

COMMENT / ISSUES	RESPONSES
<p>There is a current facility in Mossdustria, possible alternative location.</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The harbour precinct provides for operational fishing industries and as such is not a residential area. In addition, the plant in Mossdustria has recently had its AEL revoked for non compliance and is no longer operational.</p>

COMMENT / ISSUES	RESPONSES
<p>Zoning is questionable for current activity.</p>	<p>Delplan: The zoning of the subject property according to the Mossel Bay Integrated Zoning Scheme By-Law is "Transport Zone I: Transport Use". "Transport Zone I: Transport Use" has a secondary right, namely Industry (Industrial Zone II). The definition of an Industry is as follows: "Industry" means a property used as a factory and in which an article or part of the article is made, manufactured, produced, built, assembled, compiled, printed, ornamented, processed, treated, adapted, repaired, renovated, rebuilt, altered, painted (including spray painting), polished, finished, cleaned, dyed, washed, broken up, disassembled, sorted, packed, chilled, frozen or stored in cold storage; including offices, caretaker's quarters, factory shop or other uses that are subservient and ancillary to the use of the property as a factory;"</p> <p>This definition does not include a noxious trade or risk activity. The air quality assessment (done by Lethabo Air Quality Specialists (Pty) Ltd), however, made recommendations so that odour generation can be reduced substantially by adhering to the recommendations in the report.</p> <p>The proposal is therefore not a noxious trade and no split zoning is needed. The new section can be handled as a consent use only.</p> <p>Afro Fishing: Correct. There is no intention to not abide by zoning regulations.</p>

COMMENT / ISSUES	RESPONSES
<p>Synergy with other businesses is questionable.</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>Delplan: The Mossel Bay Harbour has a great potential to utilize the current buildings on the subject property and to develop these buildings to its fullest. The proposed development is an indicator that investors still want to develop the current harbour and expand the ancillary uses.</p> <p>The development of the Mossel Bay Waterfront is a great initiative, but the proposal will take time to develop. The current proposed development will develop the harbour to its fullest and utilize current buildings on the subject property.</p> <p>It is evident that the proposed development, although not in line with the Waterfront proposal, that it is in line with the MBSDF (2018) as it promotes a necessary economic injection that Mossel Bay needs and provides work opportunities for the locals.</p> <p>Afro Fishing: It is the aim of Transnet, the custodian and landlord of the Port of Mossel Bay, to better utilise the harbour. One of the harbour purposes is to provide a base for the local fishing industry. This project is fishing related and thus a fit with the goals of Portnet and hence Transnet.</p>
<p>Van Huyssteen, George - Private</p>	
<p>Registered by Marelize Kapp</p>	<p>Registered 25 March 2019</p>

COMMENT / ISSUES		RESPONSES
Background Information Document		
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>		
<p>25-Mar-19</p>	<p>The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: Please supply details of the irregularities referred to. There should be other forums to address these allegations.</p>

COMMENT / ISSUES		RESPONSES
	The effect of odours.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
Van Niekerk, Albè- Beacon Wharf		
	Registered by email	Registered 21 November 2019
Van Rensburg, Ruhan - Afro Fishing employee		
	Registered as an I&AP at public meeting / information session	Registered 20 November 2019
Van Tonder, Annalie - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>ar-19</p> <p>Pollution possibilities.</p>	<p>Cape EAPrac: Air quality was identified as a potential pollution source for the proposed facility. The Air Quality Impact Assessment has considered this, and with the implementation of the odour abatement systems proposed, the impact is rated as Very Low.</p> <p>Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: There will be no pollution from this modern plant. The community and sea environment will not be harmed.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant. As a result there is no reason why the walk-way should become any less desirable.</p>

COMMENT / ISSUES		RESPONSES
25-M	Overfishing in Mossel Bay.	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Certain species of pelagic fish are not suitable for human consumption for several reasons. For example, anchovy is small and oily and not conducive to filleting and processing for human consumption. This type of fish is in abundance in SA waters and therefore harvested for reduction into fish meal and fish oil. Fish meal is sold into the animal feed industry and fish oil mainly used for human consumption. The fish is caught at night because they mainly feed and shoal at night.</p>
	The effect of smell in Mossel Bay.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
Van Tonder, Jacques - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>Changes in coastal discharge permit - possible increase in pollution</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p>

COMMENT / ISSUES		RESPONSES
25-Mar-	The effect of smell on people and tourism.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6 that addresses the impact on local tourism and businesses. It is imperative that the sense of place that attracts tourists is not negatively affected. Special attention is thus required to minimise the visual impact and nuisance factors during construction and operations. If the proposed mitigation measures are implemented, there should be very little - if any - impact on tourism.</p>
Van Wyk, Gert - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.		

COMMENT / ISSUES	RESPONSES
<p>The pollution of the sea due to stick water by Afro Fishing causing possible pollution in the sea around the harbour.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>Afro Fishing: No stikwater will be pumped into the sea. This is not within the parameters of the process flow diagram for the proposed facility.</p>

r-19

COMMENT / ISSUES		RESPONSES
25-Ma	<p>Attracting of flies to the CBD as well as bad odours affecting the town and tourism.</p>	<p>LAQS: Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>MPBS: Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6 that addresses the impact on local tourism and businesses. It is imperative that the sense of place that attracts tourists is not negatively affected. Special attention is thus required to minimise the visual impact and nuisance factors during construction and operations. If the proposed mitigation measures are implemented, there should be very little - if any - impact on tourism.</p> <p>Afro Fishing: Flies have not been an issue in other towns where there are fish meal plants. For your interest AF does already have pest and rodent control measures in place. Service companies like Rentokill and Initial Hygiene already have service agreements with AF to control these factors.</p>
Van Wyk, Annelie - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		

COMMENT / ISSUES	RESPONSES
<p>Please find attached comment.</p>	<p>Cape EAPrac: Many thanks for your email and your comments. I have registered you as an Interested & Affected Party to ensure that you receive all future correspondence.</p> <p>Your comments will be collated and responses will be provided in due course to your concerns.</p>
	<p>Cape EAPrac: Please be advised that the Environmental Impact Assessment process follows a prescribed format and timeframe and as such the process will continue as explained in the attached summary.</p> <p>Afro Fishing does not obtain quotas for the catching of fish but is a processing facility. There are currently legal processes being followed relating to the so called “fish rot” scandal, however this does not have any bearing on the application currently underway for the proposed construction of the facility.</p> <p>The task team travel to the existing plants using RTO in Portugal and Spain was crucial to the specialist investigations as there are no such plants operating within the southern, central, western or eastern parts of Africa. The confidence ratings for the assessments would have been very low and no observed data would have been included in the various reports. There is no lack of objectivity nor bias by any member of the professional team who are all very respected experts in their fields.</p>

COMMENT / ISSUES	RESPONSES
<p>I herewith request that this process is put on hold until the “fish rot” scheme is fully investigated and members of the public informed of the outcome I furthermore request that all investigations/reports done by professionals whose trip to Portugal and all expenses thereof were paid by the applicants be declared null and void because of lack of objectivity.</p>	<p>Afro Fishing: The “fish rot” scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. This activist provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p> <p>The consultants invited to see the odour abatement facilities were invited so that they can become familiar with the technology. An air quality consultant and environmental consultant cannot draft impact studies if they are not informed regarding the technology and able to smell for themselves whether the plant is efficient or not. This was the aim of the visit. If Afro Fishing wanted to influence the consultants we would not have asked that they see the reference sites and would have made this a desktop exercise. No consultant would anyhow produce an impact study based on desktop studies only. They would need to physically see the equipment and interview operators/managers etc to make their own conclusions.</p>

COMMENT / ISSUES	RESPONSES
<p>09-Dec-19</p> <p>I still do not understand why the applicants paid for the trip. If it was a necessity, as you say, why not foot the bill yourselves? It is hard to accept objectivity if you were on the receiving end of so much “generosity”. I also fail to understand why an international scandal involving certain people should not first be cleared out of the way. Or will those pushing it forward regardless, take responsibility for this decision if the rumours prove to be true?</p>	<p>Cape EAPrac: Each specialist and the environmental consultant are appointed by the applicant to facilitate the legal process. We are remunerated for all work done as part of the EIA process. Each of us sign legal declarations of independence and to this end we made sure the that the details of the site visits were documented and included in all public reports.</p> <p>The segment (included in the email response) is an excerpt from the National Environmental Management Act 2014 EIA Regulations regarding remuneration (which I have included as an attachment). It is thus clear that any applicant is responsible for the costs associated with an application, in this case the collection of data pertaining to a technology that is critical to the management of odours.</p> <p>LAQS: LAQS is not aware of any "international scandal" associated with Afro Fishing. Ms Van Wyk does not state whether she is retired or actively working. If she is actively working, it is not known if she is working for a company or for herself. Like ANY company, LAQS provides a product for which it is expected to be paid. If that involves travelling to another country to obtain first-hand facts on behalf of a client, it expects that client to carry the costs involved. If there was any fishmeal factory in South Africa that applied RTO technology, that factory would have been visited instead of two in Europe. Approximately 70-75% of LAQS's business activities involve work on industrial sites away from its offices. If LAQS did not charge clients for travelling and accommodation costs it would soon go out of business. LAQS cannot comment of "rumours" unless they are stated clearly. Would Ms Van Wyk have been satisfied with the outcome of an environmental impact study that was not based on facts, but on some assumed information?</p>

COMMENT / ISSUES	RESPONSES
<p>herewith formally request that this process is halted pending legal investigations against role players and the public being informed of the outcome of such. Please put this request on record.</p>	<p>Cape EAPrac: Please be advised that the Environmental Impact Assessment process follows a prescribed format and timeframe and as such the process will continue as explained in the attached summary.</p> <p>Afro Fishing does not obtain quotas for the catching of fish but is a processing facility. There are currently legal processes being followed relating to the so called “fish rot” scandal, however this does not have any bearing on the application currently underway for the proposed construction of the facility.</p> <p>Afro Fishing: The “fish rot” scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>

COMMENT / ISSUES	RESPONSES
<p>I furthermore reiterate that I am questioning the objectivity of advisors. If your somewhat subjective explanation below is to be used across all boards it could in fact mean that:</p> <ul style="list-style-type: none"> •A judge can be taken on an all-expense- paid trip by an accused without the judge being seen as subjective, because he/she is highly respected and has signed an objectivity clause. •A journalist can be taken to India by well known, albeit tainted, Indian businessmen and would write an objective report afterwards because of the reasons cited by you. Excuse me if this seems somewhat “fishy” to me 	<p>Cape EAPrac: Each specialist and the environmental consultant are appointed by the applicant to facilitate the legal process. We are remunerated for all work done as part of the EIA process. Each of us sign legal declarations of independence and to this end we made sure the that the details of the site visits were documented and included in all public reports.</p> <p>Your insinuations are unfounded and unsupported. The project team and the task team have been completely transparent regarding the trip and the reasons behind it.</p>
<p>I furthermore object against an industry in the centre of town which has the potential to change the whole identity of a town that should focus on the tourism industry</p>	<p>Cape EAPrac: The proposal is to redevelop an exiting site inside a working harbour and it will not change the identify of the town. Furthermore the port authorities have allocated the western side of the port to commercial fishing and not tourism activities.</p>
<p>I also object against trucks using our already narrow and congested streets and passing a church in the centre of town.</p>	<p>Urban Engineering Noted. The Traffic Impact Study showed that the impact will be Very Low.</p>
<p>I object against our marine resources, already under threat, being further depleted.</p>	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Annual fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There is therefore no increase in activity unless the resource allows for it and not just the building of a new factory.</p>
<p>There is no need for you to respond to my objections. Please just add it to the list of other concerned citizens’ objectives for the record.</p>	<p>Cape EAPrac: Thank you for your participation in the EIA process.</p>

COMMENT / ISSUES	RESPONSES
Comment form	
1. Trucks in central Mossel Bay using narrow streets.	<p>Urban Engineering Please refer to the Traffic Impact Study</p>
2. Water usage in harbour. Algae in harbour.	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Afro Fishing: The harbour water will not be affected by the new factory. No polluted water will be discharged into the harbour. The harbour water changes with each high and low tide. i am sure there is algae in the sea so I not sure what the algae concern is related to.</p>
Non differentiation of fish caught in nets, draining of fish life	<p>Afro Fishing: Pelagic fishing is normally a clean catch. There is little bycatch and the bycatch is normally other pelagic species. Pelagic fish are caught when they shoal so there is not normally line fish and other large specie fish caught at the same time. Seals do feed on the catch in the net and are a nuisance. Seals however have the intelligence to feed peacefully in the net and then to just pop over the side when done.</p>

COMMENT / ISSUES		RESPONSES
09-Dec-1	<p>Negative international reports on people involved in project.</p>	<p>Afro Fishing: The “fish rot” scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>

COMMENT / ISSUES		RESPONSES
	All expenses paid trip to Portugal sponsored by project	<p>Cape EAPrac: Each specialist and the environmental consultant are appointed by the applicant to facilitate the legal process. We are remunerated for all work done as part of the EIA process. Each of us sign legal declarations of independence and to this end we made sure the that the details of the site visits were documented and included in all public reports.</p> <p>The segment (included in the email response) is an excerpt from the National Environmental Management Act 2014 EIA Regulations regarding remuneration (which I have included as an attachment). It is thus clear that any applicant is responsible for the costs associated with an application, in this case the collection of data pertaining to a technology that is critical to the management of odours.</p>
Van Zyl, Janine- Private		
	Registered by email	Registered 19 March 2019
Background Information Document		
	Air pollution.	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
	Stinking odours (unpleasant).	As noted above

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 868 91 991">19-Mar-19</p> <p data-bbox="114 592 1077 691">I am the owner of 3 guesthouses opposite the proposed development. If there is a smell of fishmeal in the air my 3 costly investments will be worth nothing. 10 people with work. This area is developed for tourism not industry.</p>	<p data-bbox="1099 220 1178 244">MPBS:</p> <p data-bbox="1099 256 2168 392">The port is a working harbour dealing with various economic activities among others fish processing by three businesses operating within the Port limits. This a brownfields project and therefore measures are taken to address the impact of the additional activities proposed within the Port.</p> <p data-bbox="1099 443 1256 467">Cape EAPrac:</p> <p data-bbox="1099 480 2168 691">According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p data-bbox="1099 742 2168 841">According to the Port Development Plan, all tourist facilities, the so called Waterfront, will be developed on the western side of the port whilst the eastern side will remain commercial fishing and processing.</p> <p data-bbox="1099 892 1249 916">Afro Fishing:</p> <p data-bbox="1099 928 2168 1064">The guesthouse industry has not been affected in other fishing harbours where fish meal plants are present and this is the situation in Hout Bay and Cape Town Waterfront. With the odour abatement systems planned for this plant we expect to have no impact on the guesthouse industry.</p>

COMMENT / ISSUES	RESPONSES
<p>Mossdustria would be a more sensible choice because that is an industrial area. No fishmeal plant can guarantee a 100% odour free environment next to a residential area (tourism focus point).</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The harbour precinct provides for operational fishing industries and as such is not a residential area. In addition, the plant in Mossdustria has recently had its AEL revoked for non compliance and is no longer operational.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
<p>Van Zyl, Susarah - Private</p>	
<p>Registered via email</p>	<p>Registered 12 March 2019</p>
<p align="center">Background Information Document</p>	

COMMENT / ISSUES	RESPONSES
<p>NOTE: The original comments were provided in Afrikaans and have been translated as per the Language Policy for EIA. The original copies are included as Annexure F4a.</p>	
<p>ar-19</p> <p>I would like to express my objection to the proposed fishmeal and fish oil factory in the harbour area. The odour will be problematic for residents and tourists. I personally would not like to be on the beach with an unacceptable odour infecting my nose. I understand that there are apparently modern technologies that will apparently control odours, but I do not believe that it can completely remove bad odours.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: There are several disciplines and systems to be installed to prevent the build up of bad odours. Even if there are problems in the factory, the RTO system will incinerate the odours, whether good or bad.</p>

COMMENT / ISSUES		RESPONSES
12-M	<p>It will have a very negative effect on tourism and for Mossel Bay. I previously lived near a baking powder factory and on some days, depending on the wind direction, the odour was unbearable. Our beautiful Mossel Bay does not need to stink, the Island with its seals already sometimes emits terrible smells. That is more than enough, we do not need more bad odours, especially not near The Point.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using emission factors published by the United States of America's Environmental Protection Agency (USEPA), shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>MPBS: From a socio-economic perspective, the impacts have been assessed and these are aligned with mitigation measures to address potential negative effects.</p> <p>Afro Fishing: As explained there will be no 'unbearable' emissions from this factory.</p>
Van Zyl, Lynette - SFM Streek Radio		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Van Zyl, Linda - SMART		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Van Zyl, Chris - Private		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Van Zyl, Jannie - Sea Shells B&B		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Draft Basic Assessment		
	My properties are located on Bland Street, within a 300 meter radius of the planned development. My concerns are as follows:	

COMMENT / ISSUES	RESPONSES
<p>1. There is bound to be an increase in vehicular activities and general traffic past my properties. Workers require taxi transport, and trucks will collect the factory's products. The roads within and feeding Mossel Bay are already insufficient to carry the current traffic load, never mind a further increase.</p>	<p>Urban Engineering Please refer to the relevant Traffic Impact Study for the relevant details. The study shows that the impact will be Very Low.</p>
<p>2. We have no guarantee that offensive odours won't pollute our immediate environment. Bad smells can only be regulated whilst very technologically advanced equipment is functioning correctly. How will your factory guarantee that properly trained personnel will constantly control this process, and that maintenance schedules will be followed to ensure a 100% odourless plant for the duration of five years?</p>	<p>Afro Fishing: A fish meal plant that processes fresh fish and with good plant disciplines does not produce offensive odours. Just with water and chemical scrubbing a fish meal plant can be odourless as is the case in the CT Waterfront and other West Coast fishing towns. Our intention is to on top of this to install a RTO plant to reduce the emission levels of the troublesome chemicals to be below detection levels. Staff will be suitably skilled and maintenance schedules followed. Without this we will not be able to operate the plant.</p>
<p>3. Which body would be enabled to effect a shutdown of the plant, should Afro Fishing fail to deliver on its promises? No forum exists where complaints can be lodged, and one needs to be established as a matter of urgency should the public require it.</p>	<p>Cape EAPrac: A Monitoring Forum has been recommended as a condition of both the Environmental Authorisation and the Air Emission License. The authority who will have the main authority to shutdown the plant if there is non compliance will be the Garden Route District Municipality.</p>
<p>4. The current plant already produces noise pollution through the movement of crates and by the workers themselves. This occurs at night as well, and is bound to increase, which will cause further disruption of peace to the town's inhabitants.</p>	<p>Afro Fishing: There are several fishing operations in the harbour plus other industries. Mossel Bay is a working harbour and the noise is no worse than Marsh street on a busy pub night. Afro Fishing will however implement disciplines and procedures to reduce factory noise, staff noise, taxi and truck noise, etc.</p>

COMMENT / ISSUES	RESPONSES
<p>5. Our marine natural resources already suffer due to the twin pressures of water pollution and overexploitation over the years. Where is the research that proves conclusively that our resources will not be damaged irrevocably, or destroyed completely?</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly. There has been no incidences of non compliance with the permit conditions.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p> <p>Afro Fishing: As per above, water discharge is controlled by discharge permits and sampling. There is however no harmful discharge from the existing operation and it will be the same for the new fish meal operation. The marine resources are protected by the Department of Fisheries and the various Environmental Departments. Boats are not allowed to just fish. There are permit conditions and quotas involved to ensure that fishing is sustainably performed.</p>

	COMMENT / ISSUES	RESPONSES
12-Dec-19		<p>Cape EAPrac: The fish stock availability are scientifically determined and allocated by the Department of Fisheries via the Total Allowable Catch (TAC) protocol. The surveys take place twice a year for various fisheries species and have done so for nearly 35 years. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing does not apply for quotas themselves but buys in fish from other boats and companies that have quotas. These allocations are also very closely monitored throughout the year and can be changed if there is a need to do so.</p>
	<p>There is no reason why this plant cannot be moved to Mossdustria. That would be the appropriate are for an industrial development, not within the city limits.</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: The proposal to locate the new plant in Mossel Bay is based on the existing operation of Afro Fishing and the results of the anchovy and red-eye herring spawner surveys. These surveys indicate a high prevalence of industrial fish in the southern cape waters and hence Mossel Bay is ideally located for an offloading and processing facility. It would therefore not be prudent to locate the new facility away from current operations and away from the fishing resource to be targeted.</p>

COMMENT / ISSUES	RESPONSES
<p>The rumour that Afro Fishing's directors are involved with charges of fraud in Namibia also needs to be investigated, so clarity can be gained with regards to whom we're dealing with.</p>	<p>Afro Fishing: The "fish rot" scandal in Namibia is totally unrelated to this project and investment. Just because a local activist (Mosselbayontheline - Elsa Wessels) incorrectly links Afro Fishing to this scandal does not mean it is true. She has even linked me to gang wars in Manenberg - see her articles. This same activist continues to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email in July 2019.</p> <p>This same activist also provides a twisted report that feeds the narrative she wants. She fails to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. She fails to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. She also fails to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as Elsa Wessels is purporting.</p>
<p>Your timeous feedback will be greatly appreciated, and we trust that public input will be taken seriously.</p>	<p>Cape EAPrac: Thank you for your participation in the EIA process. Your comments will be included in the Final Basic Assessment Report to be submitted to the competent authority as required by the NEMA 2014 EIA Regulations.</p>
Venter, Carel - Mossel Bay Municipality	
<p>Automatically registered as an I&AP.</p>	<p>Registered 22 February 2019</p>
Viljoen, Nina - Eden District Municipality	
<p>Automatically registered as an I&AP.</p>	<p>Registered 22 February 2019</p>
Vonscha, Hansie - Private	
<p>Registered as I&AP at public meeting / information session</p>	<p>Registered 20 November 2019</p>
Weijters, Frans - Private	
<p>Registered as I&AP at public meeting / information session</p>	<p>Registered 20 November 2019</p>
Weijters, Beverley - Private	
<p>Registered via email</p>	<p>Registered 14 August 2019</p>

COMMENT / ISSUES		RESPONSES
Wessels, Daniel - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		
25-Mar-19	Comment submitted is identical to that submitted by Messr JS Miller above.	Please see responses as provided to Messrs JS Miller.
Wessels, Elsa - Mossel Bay On The Line		
	Registered via email	Registered 19 March 2019
Draft Basic Assessment		
	Hereby my final contribution towards the public participation process:	
	1. NO marine impact study has been done to determine the impact of such a huge industry on the native fishing stock and there are NO guarantees that:	<p>Cape EAPrac: No Marine Impact Assessment is being proposed for this facility. The reason for this is that the facility currently has a Coastal Waters Discharge Permit in terms of the National Environmental Management: Integrated Coastal Management Act which is already monitored and managed. The increased capacity will lead to an increase in volume of seawater in the discharge and not constituents. In fact, the discharge quality is likely to improve (i.e. have less proteins in it), as the facility will keep recycling discharge water to make use of all available protein for the fishmeal.</p> <p>In addition to the CWDP in place, TNPA commissions twice yearly water quality and sediment quality monitoring and analysis in and next to the harbour. To date, these results have shown that the fisheries industries in the harbour are complying with their management requirements.</p>
	1. Huge vessels will only catch pelagic fish and not also other fish species;	<p>Afro Fishing: Correct only pelagic fish will be targeted. The boats have sonars and fish finding equipment to ensure that this is the case. The fishing vessels that will supply Afro Fishing will be no bigger than vessels already in the sector.</p>
	2. The awaited final national fishing quota and TAC for pelagic fish in SA's waters will allow for such an industry where 1 000 TON pelagic fish are to be caught daily;	<p>Afro Fishing: Correct. The final TAC will be the same. It is just that a % of the allocated TAC will now be processed in Mossel Bay.</p>

COMMENT / ISSUES	RESPONSES
<p>3. WHERE exactly will the "fresh" pelagic fish come from, seeing that currently all Afro Fishing's sardines are imported from Morocco . . . so if the fish comes from elsewhere, WHY must the fish meal plant be in MOSSSEL Bay and not closer to the area where it is harvested?</p>	<p>Afro Fishing; Pilchards which is also a pelagic specie currently has a low TAC. This is why we must import some of our pilchards for the cannery. The industrial species destined for the fish meal plant are anchovy and red-eye herring. These species are plentiful in the southern and eastern cape waters at present.</p>
<p>4. If the new RTO system and other techniques to be used are so sophisticated and advanced, how will local (mostly unskilled) job seekers benefit from the plant if highly qualified experts are required to operate, maintain and manage it?</p>	<p>Afro Fishing: The technology is merely new to SA and expensive. The RTO requires an operator with less skills than a boiler plant operator.</p>
<p>5. The same air-, water- and environmental pollution as is experienced constantly at other fish meal plants in SA and abroad do not periodically happen here too due to technical problems and/or other unforeseen circumstances. Just ONE mishap can destroy Mossel Bay's reputation as a pristine tourism Mecca forever.</p>	<p>LAQS: It is strange that a new development is targeted in this manner while existing polluting (and odorous) sources are ignored. It is assumed that this comment refers to other fishmeal factories in South Africa. Yes, they do emit odours, but none of them use the state-of-the-art technology that is planned by Afro Fishing. The proposed factory will be controlled by an intelligent computer system that continuously monitors the process, warns if any parameter gets out of specification and will shut down the process if the problem is not corrected. It is LAQS's understanding that repairs to the process can be effected in a matter of hours.</p> <p>Afro Fishing: Your point is noted. It is our intention to run a clean, nuisance free operation.</p>
<p>It is my recommendation that:</p>	

COMMENT / ISSUES	RESPONSES
<p>12-Dec-19</p> <p>1. The fish meal plant be established elsewhere as the location in such close proximity to established homes, guest houses, tourism-based businesses and the impact on the town's infrastructure like roads, water resources and pristine marine life is far TOO risky for the few seasonal jobs it MAY provide . . .</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: The proposal to locate the new plant in Mossel Bay is based on the existing operation of Afro Fishing and the results of the anchovy and red-eye herring spawner surveys. These surveys indicate a high prevalence of industrial fish in the southern cape waters and hence Mossel Bay is ideally located for an offloading and processing facility. It would therefore not be prudent to locate the new facility away from current operations and away from the fishing resource to be targeted.</p> <p>The aim is to locate this plant in the working Mossel Bay harbour as fishing trawlers deliver the fresh fish. The impact from this operation has been researched by various experts and they indicate that tourism and other CBD activity will not be affected by this project.</p>

COMMENT / ISSUES	RESPONSES
	<p>Cape EAPrac: Thank you for your email. As has been previously stated and included in the Basic Assessment Report, Afro Fishing does not have any fishing quotas but obtains fish from companies that have legal quotas allocated to them.</p> <p>This Environmental process relates to the construction and operation (in terms of air quality) of a fishmeal and fish oil production facility on Quay 2 of the Port of Mossel Bay. It is being undertaken in terms of the 2014 Environmental Impact Assessment Regulations and the process is bound by the statutory timeframes and requirements as gazetted in the regulations.</p> <p>This process will thus continue as explained in the presentations of the 20th November 2019 and in the Draft Basic Assessment Report. Your comments will be included in the report to be submitted to the competent authority.</p>

COMMENT / ISSUES	RESPONSES
<p>2. The entire public participation process be postponed until the international #fish rot investigation is completed and the public has been duly informed about who exactly Afro Fishing's directors, affiliates, shareholders, sponsors and partners are.</p> <p>THIS is truly in public interest and to go ahead with the process before above crucial information has been made public, is not only illegal and unethical, but also against the purpose of any public participation process.</p>	<p>Afro Fishing: The "fish rot" scandal in Namibia is totally unrelated to this project and investment. Just because you have incorrectly linked Afro Fishing to this scandal does not mean it is true. You have even linked me to gang wars in Manenberg which is just ridiculous and unethical journalism. You continue to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email addressed to you in July 2019.</p> <p>Your articles provide a twisted report that feeds the narrative you want published. You fail to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. You fail to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. You fail to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as per your narrative regarding these events.</p> <p>I do not think it is in the public interest to stop this authorisation process because of bad and unethical journalism. The process is transparent and Afro Fishing will answer any questions honestly and provide the information needed (by the authorising bodies) to disprove your twisted insinuations.</p>
<p>I trust the above issue WILL be addressed before any further authorisation is given?</p>	<p>Afro Fishing: See the comment above.</p>

COMMENT / ISSUES	RESPONSES
	<p>Cape EAPrac: Thank you for your email. As has been previously stated and included in the Basic Assessment Report, Afro Fishing does not have any fishing quotas but obtains fish from companies that have legal quotas allocated to them.</p> <p>This Environmental process relates to the construction and operation (in terms of air quality) of a fishmeal and fish oil production facility on Quay 2 of the Port of Mossel Bay. It is being undertaken in terms of the 2014 Environmental Impact Assessment Regulations and the process is bound by the statutory timeframes and requirements as gazetted in the regulations.</p> <p>This process will thus continue as explained in the presentations of the 20th November 2019 and in the Draft Basic Assessment Report. Your comments will be included in the report to be submitted to the competent authority.</p>

COMMENT / ISSUES		RESPONSES
28-Nov-19	<p>I am still awaiting your response to the underneath request to postpone all further public participation process activities re Afro Fishing's fish meal plant until the #fish rot investigation has been completed. This is a huge international scandal that has rocked the entire fishing industry regarding fishy deals, bribery and money-laundering to gain fishing quotas in Namibia, Angola and the African coastline, including South Africa?</p> <p>Six Kickback Kings in Namibia were already taken into custody yesterday as the Wikileaks investigation evolves . . .</p>	<p>Afro Fishing: The "fish rot" scandal in Namibia is totally unrelated to this project and investment. Just because you have incorrectly linked Afro Fishing to this scandal does not mean it is true. You have even linked me to gang wars in Manenberg which is just ridiculous and unethical journalism. You continue to publish articles stating that I refuse to inform who the Afro Fishing directors are when I confirmed the directors in an email addressed to you in July 2019.</p> <p>Your articles provide a twisted report that feeds the narrative you want published. You fail to inform that the Namibian scandal pertains to government officials and ministers who were bribed by an Icelandic fishing company for fishing quotas and that these same officials are now in jail. They have also had to resign from the boards they represented, etc. You fail to inform that the scandal is not linked to Afro Fishing or the Namibian fishing company that shares a common director with Afro Fishing. You fail to inform that the Namibian Fishing company that shares a director with Afro Fishing has a gazetted arrangement whereby they are compelled to employ 700 land based employees. The employment of land based employees is why they were allocated their quotas and not any link to the corrupt Icelandic fishing company arrangement as per your narrative regarding these events.</p> <p>I do not think it is in the public interest to stop this authorisation process because of bad and unethical journalism. The process is transparent and Afro Fishing will answer any questions honestly and provide the information needed (by the authorising bodies) to disprove your twisted insinuations.</p>
Background Information Document		
	<p>From your wording, I understand there is NO option to reject/deny the proposal, no matter WHAT the public outcry against it is and no matter what scientific proof and legitimate objections the public and affected stakeholders raise?</p>	<p>Cape EAPrac: All objections, support, comments or input have been included with this Basic Assessment Report and will be provided to the competent authorities. Please note that the specialist studies included here are based on scientific fact and observational data provided by professionals in their field.</p>

COMMENT / ISSUES		RESPONSES
07-Nov-19	Now WHY is that? A proposal is basically JUST a proposal and there is NO obligation to accept it and spend millions to search for "best practical options" to try and MAKE it feasible despite the overwhelming risks?	Cape EAPrac: Any EIA process undertaken by any applicant is done at risk, i.e. the application could be rejected by the competent authority. This is the nature of the undertaking and the onus is on the developer to ensure that he complies with the relevant environmental and planning process no matter the cost.
	With all due respect: Since you (AND the news editor of the local newspaper) accompanied the manager of Afro Fishing on a free trip overseas, there can never be any question about your "independent objectivity" and quite frankly, the legality of the entire environmental assessment process. It's called BRIBERY and typical of the shenanigans that have plagued the SA fishing industry over the last decade.	Cape EAPrac: That is correct, we were part of a task team on a fact finding visit to ascertain if the technology was as efficient as the specifications indicated. This has been openly discussed in public forums such as the Mossel Bay Advertiser, and a report on the visit has been included with this Basic Assessment Report. This office dismisses your allegations of bribery and supposition that the environmental process is illegal. The process has complied with the requirements of the National Environmental Management Act (NEMA) and the 2014 EIA Regulations.
	I look forward to seeing the report and to hear how much was thus far spent in an attempt to push this "proposal" through DESPITE such strong public objections and visible proof of the fish meal factory industry in South Africa.	Cape EAPrac: Please note that as has been pointed out on several occasions, the proposed fishmeal plant is not following the typical plants that currently exist in South Africa. The technology is unique to this application and the science behind this assessment strongly proves that this technology will be the Best Available Technology for fishmeal plants in the future.
	We WILL follow the money trail to see WHY so much effort and money have been prematurely invested in a mere "proposal" for an industry that has NO positive advantage to the town, the environment OR its people . . .	Cape EAPrac: Please read the reports.
	Attachment articles were included with the email but have not been included in this report. Please see Annexure F4 for copies of the email.	
		Cape EAPrac: In response to your attachment articles, please note that this proposal has nothing to do with fishing licenses, fishing allocations nor abalone and as such your accusations are completely unfounded..

COMMENT / ISSUES	RESPONSES
<p>It's ten months since the application and request for public input were published re Afro Fishing's proposed fish meal and oil manufacturing plant in Quay 1 in Mossel Bay. Since then, no feedback whatsoever was received and the public is once again left in the dark.</p>	<p>Cape EAPrac: As stated on numerous occasions to you via email and telephone, the pre application process was used to generate input from stakeholders which subsequently led to the appointment of additional specialists to the project team. These studies take time to finalise, especially as specific air quality sampling and analysis was required from the plants in Europe. The Air Quality specialist required specific data and information to ensure that any findings and assessments he presents include the most up to date science and level of expertise.</p> <p>Feedback has been provided to you and to the public via newspaper articles in the Mossel Bay Advertiser and on request from I&APs whenever these have been received.</p>
<p>Experience and case history in sunny South Africa has proven that public participation processes and public objections are often just window-dressing where huge, profitable industrial developments are planned - especially if it is backed by money-driven political authorities and corrupt departments with NO regard whatsoever for the environmental impact and the livelihood of small businesses</p>	<p>Cape EAPrac: This office disagrees and if you are aware of such incidences it would be better to take it up with the relevant authorities.</p>
<p>The severe drought (which necessitated the use of the desalination plant at huge cost) and the shocking state of Mossel Bay's three heavily polluted rivers should be a RED FLAG as to the severe environmental impact that ill-planned developments have. The town's infrastructure cannot cope with all the new housing and industrial developments (stormwater systems, sewerage plants, road/traffic congestion, etc. etc.</p>	<p>Cape EAPrac: This development proposal has not been ill-planned, as you yourself commented it has taken some time to get to the point where all available and up to date information can be presented.</p> <p>Since the previous I&J facility had services provided to it, the Afro Fishing expansion will not be taking up new services and this has been confirmed by the municipality.</p> <p>Please see the various traffic, engineering and electrical reports for more information.</p>

COMMENT / ISSUES		RESPONSES
06-Nov-19	<p>Furthermore, the risks and potentially disastrous impact of such a huge fish meal and oil plant in the heart of a tourist Mekka totally outweigh the very FEW additional shift jobs to be created and the fact that it is mainly the owners (Transnet and some heavy guns in the international fishing maze) who will score financially - at the cost of the entire character of the town and small businesses in the area.</p>	<p>MPBS: The proposals for the expansion of the Fish Factory is within a working Port with various economic activities, where the Port is also considered by the Municipality and Government as an important creator of jobs.</p> <p>Refer to SIA section 8: Assessment of impacts, in particular section 8.3.6 that addresses the impact on local tourism and businesses. It is imperative that the sense of place that attracts tourists is not negatively affected. Special attention is thus required to minimise the visual impact and nuisance factors during construction and operations. If the proposed mitigation measures are implemented, there should be very little - if any - impact on tourism.</p>
	<p>To further rip the ocean of healthy native fish in order to produce fishmeal for the insatiable Asian market (mainly to feed caged fish in the notorious aquaculture business) will not only disturb the sensitive marine ecology and balance - it will also result in our coveted Marine Big Five (whales, sharks, dolphins, seals and penguins) leaving the area to find food elsewhere.</p>	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Certain species of pelagic fish are not suitable for human consumption for several reasons. For example, anchovy is small and oily and not conducive to filleting and processing for human consumption. This type of fish is in abundance in SA waters and therefore harvested for reduction into fish meal and fish oil. Fish meal is sold into the animal feed industry and fish oil mainly used for human consumption. The fish is caught at night because they mainly feed and shoal at night.</p>

COMMENT / ISSUES	RESPONSES
<p>There is no place in the world where a fishmeal and oil factory does NOT have a severely negative environmental impact - no matter what modern technology is used - and Mossel Bay cannot be compared to fisherman's villages in Greece or Portugal. NOBODY and no technology can stop dead fish from stinking and technology is SO fallible and unpredictable.</p>	<p>Cape EAPrac: This is not true. The plants that were investigated as part of this process comply fully with the requirements for air quality.</p> <p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO. The technology that will be applied is the best available in the world. Nowhere in its application in fishmeal production has it resulted in the emission of odorous gases and the statement of "stinking fish" is simply unfounded.</p>
<p>This is SOUTH AFRICA with its proven record of corruption and collapse in every major department - and its own unique climate, weather and sea conditions. Just a glimpse at what is happening along the heavily polluted West Coast where a pilot aquafarming project in Saldanha Bay resulted in the caged fish escaping (devouring all native fish) and the seal population tripled to feed on the caged fish should be adequate PROOF of how inadequate our environmental impact studies are in REAL LIFE? The latest State of the Bay Report re the pollution and degradation of marine life at Saldanha Bay harbour is a typical example of what happens when huge industries with political power move in and systematically destroy and pollute the entire region, marine life and cause severe health hazards.</p>	<p>Cape EAPrac: The South African Environmental laws have been recognised widely as one of the best in the protection of sensitive environments. The process for the Afro Fishing facility has followed the prescripts of the National Environmental Management Act and the EIA Regulations.</p> <p>One cannot compare the activities on the West Coast with this application as the nature and impacts are completely different.</p> <p>Please review the Basic Assessment Report and specialist studies.</p>
<p>St Helena Bay STINKS (stinky town) and the sea around the fish meal plant is heavily polluted. Same in Gansbaai</p>	<p>As above</p>
<p>It looks great on paper and maybe in one or two other places abroad, but the REALITY in South Africa is a totally different scenario. (ESKOM, PetroSA, Transnet, etc.) Transnet also has a very bad reputation in Mossel Bay (and elsewhere) regarding continuous environmental pollution and neglect of its property. The oil leakages and overflow of its oil pits in the Bayview river in Mossel Bay have been ongoing for years . . . and still continues. So, what will be different re pollution control on their Afro Fishing premises?</p>	<p>Cape EAPrac: Afro Fishing is not responsible for Transnet actions, furthermore the proposal has made ample contingency plans in order to overcome upset conditions such as a loss of power. Please feel free to read the Basic Assessment Report and specialist studies for more information.</p>

COMMENT / ISSUES		RESPONSES
	WHO is truly to benefit from Afro Fishing's proposed fish meal and oil plant in Mossel Bay? Who are the directors BEHIND it? At what cost?	<p>MPBS: The proposals for the expansion of the Fish Factory is within a working Port with various economic activities, where the Port is also considered by the Municipality and Government as an important creator of jobs.</p> <p>This means that there are multiple beneficiaries to the facility.</p>
19-Mar-19	I would like to register as an interested and affected person regarding the planned fish meal and fish oil factory in the Mossel Bay harbour.	<p>Cape EAPrac: Your correspondence has been received and you are registered as an I&AP.</p>
	I am totally AGAINST the fish meal factory as it will have a disastrous effect on the flourishing tourism industry, marine life and livelihood of the town.	<p>MPBS: The proposals for the expansion of the Fish Factory is within a working Port with various economic activities, where the Port is also considered by the Municipality and Government as an important creator of jobs.</p> <p>Afro Fishing: There will be no impact on the local tourism industry or the marine environment. Reasons have been explained above.</p>
	I please need confirmation that my correspondence reached you and that I am duly registered as an I&AP.	<p>Cape EAPrac: Your correspondence has been received and you are registered as an I&AP.</p>
Wicomb, Chirswell - Afro Fishing employee		
	Registered as I&AP at public meeting / information session	Registered 20 November 2019
Wiffen, Albert - Private		
	Registered via email	Registered 25 February 2019
Wiggill, Carina - Heritage Society		
	Registered via email	Registered 24 March 2019
Draft Basic Assessment		
	1, PUBLIC PARTICIPATION PROCESS	

COMMENT / ISSUES	RESPONSES
<p>Heritage Mossel Bay is of the opinion that the overall public participation process followed has been inadequate and that the basic assessment as carried out ultimately amounts to no more than minimum compliance with legislative requirements.</p>	<p>Cape EAPrac: There has been public participation since February 2019 and has included notices, written notices, newspaper adverts, newspaper articles and email correspondence.</p> <p>The investigations into the proposal and its potential impacts have not been taken lightly and have examined the issue very closely. We disagree with your statement that the process has only considered minimum compliance.</p> <p>LAQS: It appears as if Ms Wiggill does not trust the authorities to enforce the necessary measures to control the impact of the proposed factory. She is directed to the comments made by Dr Johann Schoeman, the Garden Route District Municipality's officially appointed Air Quality Officer.</p> <p>Afro Fishing: The process followed was in fact longer than usual. Afro Fishing did do a pre-application in March 2019 already where 'Interested and Affected Parties' could already register. The process could just have been to make the project public during the formal public participation month in December 2019. Many newspaper articles regarding the project and application were published throughout the year. Many impact studies were performed which were probably not necessary but important for AF and the public to ensure we comprehensively understand the impacts. A task team was send to Europe to be introduced to the odour abatement technology. It is our view that we certainly did not 'do the minimum' required. This is however a process and the application is by no means completed. There is still a long way to go.</p>
<p>While notices / invitations to participate in the public participation process meet the minimum legislative requirements more effort should have been put into this aspect to ensure that public participation is as wide and thorough as possible on a project which may have grave consequences for the tourism industry of Mossel Bay, and therefore the creation and protection of jobs.</p>	<p>Cape EAPrac: There has been public participation since February 2019 and has included notices, written notices, newspaper adverts, newspaper articles and email correspondence.</p>

COMMENT / ISSUES	RESPONSES
<p>Efforts to contact key role players such as the f\Mossel Bay Business Chamber and Mossel Bay Tourism were inadequate, while the Mossel Bay City improvement District appears not to have been contacted at all.</p>	<p>Cape EAPrac: Mossel Bay Tourism and Mossel Bay Business Chamber have been registered as I&APs and have had opportunity to comment on all documentation. The Mossel Bay City Improvement District has not requested registration from this office, however several of the board members are registered as I&APs.</p>
<p>Heritage Mossel Bay, which is registered in terms of the National Heritage Resources Act, No 25 of 1999 as well as a Public Benefit Organisation, and strives inter alia to promote the rich heritage of Mossel Bay and to preserve Mossel Bay's sense of place was not interviewed at all (as opposed to two organizations concerned with crime prevention and security).Its interest in the matter stretches wider than the protection of certain historic features in the proposed Afro Fishing development area.</p>	<p>Afro Fishing: We met for the first time in 2018 already regarding this project. We even arranged a site visit with Errol Baartman (Portnet) and your team. The feedback you gave us was that the buildings have no heritage value and the stone walls were of poor quality. Afro Fishing did at that meeting undertake to nonetheless build some stone walls into the design so that we contribute to the sense of place and heritage of Mossel Bay.</p>
<p>The Public Participation meeting held in the Mossel Bay Town Hall on 20 November 2019 appears to have been manipulated to frustrate public participation. The facilitation of the meeting by a senior municipal official gives the impression that the Mossel Bay Municipality had already given its approvals for the project, confirming Heritage Mossel Bay's perception that it was at best another minimum-compliance activity to meet legislative requirements.</p>	<p>Cape EAPrac: The Mossel Bay Municipality has not given any approvals to date. In terms of due process,, they cannot, nor will not do so until the NEMA EIA process and the NEM:AQA Air Quality processes are complete. The head of communications, Mr Colin Puren is an experienced meeting facilitator.</p> <p>A public meeting is not a specific requirement of a public participation process, and as such is not, as you state part of "minimum compliance". In addition the information session and meeting was advertised and all registered I&APs were notified of the event explaining that I&APs could access all available information from 16h00 and speak directly to the various specialists, with a formal meeting commencing at 18h00. This gave people ample opportunity to review, discuss and ask questions.</p>
<p>2. IMPACT ON MOSSEL BAY WET.FISH INDUSTRY AND MARINE LIFE</p>	

COMMENT / ISSUES		RESPONSES
12-Dec-19	<p>The Draft Basic Assessment Report is vague on the longer-term impact of the factory on the fish biomass off the Mossel Bay coast and therefore (a) on the historic traditional and traditional wet-fish industry of Mossel Bay as well as (b) other forms of marine life such as birds, mammals, etcetera, along the Mossel Bay coast.</p>	<p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: The proposal to locate the new plant in Mossel Bay is based on the existing operation of Afro Fishing and the results of the anchovy and red-eye herring spawner surveys. These surveys indicate a high prevalence of industrial fish in the southern cape waters and hence Mossel Bay is ideally located for an offloading and processing facility. It would therefore not be prudent to locate the new facility away from current operations and away from the fishing resource to be targeted.</p>
	<p>It is also vague on how by-catches, i.e. other than catches of the apparent desired feedstock for the plant (anchovy, red-eye, sardines, horse mackerel, etcetera) will be monitored and controlled, if possible at all, to prevent the depletion or even extinction of other edible fish species off the Mossel Bay coast.</p>	<p>Afro Fishing: The Department of Fisheries strictly manages the catches by means of compulsory catch documentation, harbour inspectors who do sampling and observers on the boats. Boats must also have VMS on board so that officials can monitor the movement of the fishing vessels online. Permit conditions clearly outline the rules of the game and boatowners and processors must comply with these conditions or permits and quotas are revoked etc.</p>
3. ENVIRONMENTAL IMPACT OF TRAWLER TRAFFIC		

COMMENT / ISSUES	RESPONSES
<p>No evidence could be found in the report of the potential environmental impact of the increased trawler traffic into the port of Mossel Bay and how it will be monitored. The danger of oil and fuel spills as well as other forms of pollution by trawlers waiting in the bay or off the Mossel Bay coast cannot be excluded. Pollution of the sea by marine vessels is unfortunately a too common occurrence to be ignored, especially not in an area which is home to two Blue Flag beaches close to the port.</p>	<p>Afro Fishing: There are other Departments that manage these aspects of fishing and legislation is already in place. Very much like there is licensing in place to manage vehicles on the roads. SAMSA regulates the actual fishing vessels and they need to be surveyed annually with regards sea worthiness, safety, etc. Oil and fuel spills must be reported so that clean-up can be arranged.</p>
<p>No or insufficient information is included in the report on offloading operations, etcetera, which may all have an impact on nearby property owners as well as the sense of place of Mossel Bay. The report also does not contain any information on the approximate sizes of vessels that will supply the plant and thus enter the bay on a regular basis.</p>	<p>Afro Fishing: The offloading of vessels will be no different to what is already happening at SeaVuna, Viking, Afro Fishing and the many other offloading quays in Mossel Bay. The same offloading methods will be applied.</p> <p>Vessel size will vary. Anchovy will be caught using traditional purse seine trawlers. Red-eye herring will be caught using bigger pelagic trawlers. Fishing vessels will be similar in size to what is already used in the this fishing sector in South Africa.</p>
<p>4, TRAFFIC IMPACT ASSESSMENT</p>	
<p>Heritage Mossel Bay cannot agree with the conclusion in the Traffic impact Assessment (Annexure G3) that the proposed development of the Fish Meal and Oil Reduction facility is expected to have a very small impact on the surrounding road network and hence the development could be allowed to continue from a transportation point of view.</p>	<p>Urban Engineering This is a statement. According to my calculations and data provided in the Traffic Impact Study, the impact will be Very Low..</p>
<p>Mossel Bay's inner-city roads are not designed for the size of trucks that will presumably be required for transportation of finished product, which, to the best of our knowledge, cannot be exported directly from the port of Mossel Bay. The assessment is silent on controls that need to be implemented on truck sizes, overnighting on public open spaces and parking areas, etcetera, is of the most important too. Mossel Bay has over the years often experienced problems with transport contractors servicing fish factories in the harbour area. Trucks exceeding the permissible tonnage for the inner-city streets have been observed entering and leaving the Afro Fishing premises recently.</p>	<p>Urban Engineering Road pavements are designed according to an equivalent E80 axle load. The actual maximum vehicle axle load is governed by legislation. No vehicles are allowed to exceed the maximum axle load used in the structural design of the road pavement. A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>
<p>5. SOC O-ECONOM C ASSESSMENT REPORT (ANNEXURE G2)</p>	

COMMENT / ISSUES	RESPONSES
<p>The report underestimates the importance of the sense-of-place factor in Mossel Bay and its importance to the tourism industry. Tourism is the mainstay of the Mossel Bay economy as well as a source for sustainable job creation. Mossel Bay Heritage accepts that no reliable data was available on job creation in the industry, but its importance to job creation would be a logical and reasonable conclusion.</p>	<p>MPBS: This is a statement and no response is required.</p>
<p>The local fishing industry, by comparison, has declined over the past number of years, because of declining fish biomass off the Mossel Bay coast. This resulted in factory closures as well as job losses. Afro Fishing itself has been forced to source feedstock from way outside the Mossel Bay area because of declining fish quantities in the area. The fishing industry relies on natural resources and is therefore unreliable from a job creation and sustenance perspective.</p>	<p>MPBS: This is a statement and no response is required.</p>
<p>It is admitted in several places in the overall Basic Assessment report, including in the Air impact Assessment, that pollutants will be emitted by the plant. The position by Afro Fishing that the negative perceptions generally associated with fishmeal factories will eventually be dispelled if the public start realising that they Afro Fishing is using new odour abatement technology reflects a lack of understanding of how perceptions develop and how they are negated.</p>	<p>MPBS: This is a statement and no response is required.</p>
<p>The Socio-Economic Assessment Report correctly makes provision for mitigators by way of communication protocols during the implementation phase of the project. It does however not address this aspect during ongoing operations. It should therefore also be made a condition for the approval, in the event of the plant going ahead, that Afro Fishing should implement extensive communication programmes during the operational phase to gradually dispel the inevitable negative perceptions that could remain for years to come. This is vital to ensure that Mossel Bay's sense of place is preserved and Mossel Bay's image of a clean town and popular holiday resort is not destroyed. Afro Fishing will also have to establish an image for itself as an environmentally friendly and responsible operator first.</p>	<p>Cape EAPrac: A Monitoring Forum has been recommended as a condition of both the Environmental Authorisation and the Air Emission License. The authority who will have the main authority to shutdown the plant if there is non compliance will be the Garden Route District Municipality.</p> <p>MPBS: The communication protocols are intended for the operational phase specifically and would form part of the conditions. Should the recommendation be made a condition of approval it will apply to both construction and operations</p>

COMMENT / ISSUES	RESPONSES
<p>The shroud of secrecy surrounding the company's two directors as well as their nonparticipation in the public participation and assessment processes impacts on the company's credibility as responsible operator from the point of view of effectively addressing negative public perceptions.</p>	<p>Afro Fishing: There has been no shroud of secrecy surrounding AF directors. Elsa Wessels has however painted this picture as it suits the narrative she wants to publish. She was supplied this information in an email in July 2019 already but she unfortunately has her own agenda. Regarding their attendance at the public participation: Perhaps you are correct I should have ensured that they were in attendance, especially with all the 'fake' news being published by Elsa Wessels. The process is however an operational one and the responsibility of the CEO and his/her team.</p> <p>I will certainly make sure that they do attend any future meeting of this nature in order to address the negative public perceptions as you suggested.</p>
<p>Background Information Document</p>	
<p>ISSUES OF CONCERN</p>	

COMMENT / ISSUES	RESPONSES
<p>I. Odour emission level, and noise impact on the central town and surrounding key tourist attractions.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p> <p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: Odour emission will be controlled and bad odours removed by the RTO unit. Machines that are noisy like vacuum pumps and compressors will be housed in sound proof cabinets or rooms.</p>

COMMENT / ISSUES	RESPONSES
<p>2. Impact on the seafront of the harbour and coastline with the pollution from the effluent discharge in the Bay, even if guarantees are given.</p>	<p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>Afro Fishing: There will be no discharges as already explained.</p>
<p>3. Harbour cannot be further contaminated with liquid and solid fish effluent.</p>	<p>Cape EAPrac: Afro Fishing has a Coastal Waters Discharge Permit from the Department of Environmental Affairs for the discharge of process water from the existing cannery. This discharge is monitored on a daily basis when the plant is in operation and will be amended to incorporate the cooling seawater for the proposed fishmeal facility. The aim of this permitting and monitoring process is to ensure the avoidance of marine pollution by the facility. There has been no incidences of non compliance with the permit conditions.</p> <p>Afro Fishing: No effluent or fish solids are currently discharged into the sea and this will remain the same after the installation of the new factory.</p>

COMMENT / ISSUES		RESPONSES
24-Mar-19	4. Increase in noise pollution from processing plant running 24hrs per day.	<p>Afro Fishing: Machines that are noisy like vacuum pumps and compressors will be housed in sound proof cabinets or rooms. The current cannery operates under the same requirements and has not had any incidents.</p>
	5. Increase in noise level and congestion of heavy duty vehicles through central town.	<p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: Noise levels to be controlled as noted above. Noise levels are easy to measure and can be managed if deemed to be over noise thresholds. In the long term however the intention is to make use of port facilities to export fish meal and fish oil directly from the harbour. In this eventuality no road freight will be required.</p>
	6. The LAQS study clearly highlights that homes, hotels and small businesses due east and west of the proposed factory will be impacted upon.	<p>LAQS: This statement is not correct. The report clearly indicates that the addition of a fishmeal plant to the existing fish canning plant will not result in any ambient air quality standard being exceeded. These standards have been set at levels the prevent any health or well-being impact of humans (including the frail and sensitive), fauna and flora.</p>

COMMENT / ISSUES	RESPONSES
<p>7. Such a development will block of any future tourist access or heritage preservation to the north east corner of the harbour.</p>	<p>MPBS: The Port is a place of economic activity and an important contributor to addressing unemployment in the Mossel Bay area. The activity is in the south west part of the harbour.</p> <p>Afro Fishing: There will be no impact on tourism or heritage</p>
MOTIVATION	
<p>The impact on Historic Precinct, the heart of the Town, The Point and the surrounding pristine beaches, the crown jewels of our town.</p>	<p>Cape EAPrac: The proposal entails the redevelopment of the existing I&J site and as such there is no change in the built environment. Heritage Western Cape was approached and has confirmed that they do not require any further Heritage assessments.</p> <p>Afro Fishing: Noted. After discussions with the Mossel Bay Heritage Society last year, it was proposed that Afro Fishing salvage all the old stone and build some external stone walls with this stone. This way having a façade that fits in with Mossel Bay design heritage.</p>
<p>The proposed plant in no way enhances the core tennent of the heritage value of the port and the old town.</p>	<p>Afro Fishing: The old dilapidated units on the I&J site certainly do not add to the heritage value of the port. New custom built buildings with stone wall elements will be of far greater value to the aesthetics of the harbour.</p>
ALTERNATIVES	
<p>The existing canning plant already relies on raw product being imported from Morocco or elsewhere. The proposed new plant will rely on product being transported to Mossel Bay, so to be viable. The proposed plant should be erected closer to where the product is sourced from, and then in an industrial area. i.e. Koega.</p>	<p>Cape EAPrac: The raw product being imported is used to supplement the cannery's operations currently and will continue as such. This fish is for human consumption and there is no intention to import industrial fish for the fishmeal and fish oil production.</p> <p>Afro Fishing: The raw material for the new plant will be harvested in Southern Cape seas and delivered by fishing trawlers to the facilities in Mossel Bay. No material for the new plant will be sourced outside of Mosel bay and road freighted to the factory.</p>

COMMENT / ISSUES	RESPONSES
<p>On many a day, the existing canning plant has black smoke discharge due to maloperation of boilers, steam plume discharge and frequent acrid fish processing smell rising up the hill. Properties set against the Hill facing due North, are all in direct line of sight of the historic I & J plant.</p>	<p>Cape EAPrac: The Garden Route District Municipality will conduct a baseline odour screening at the harbour. This will provide a starting point to identify in future, any potential problems and their origins. The proposed facility will implement the Best Available Technology to ensure that their impact on the air quality at the port complies with all relevant requirements. Please also note that the other fishmeal facility to which you refer has recently had their license revoked for non compliance. Thus it is a priority of Afro Fishing to ensure that this facility is designed, built and operated at the highest standards.</p> <p>Afro Fishing: The harbour and specifically the area zoned for fishing activity is always going to smell like a harbour. Tourists visit working harbours to see fishing trawlers, fish being processed and to experience the harbour feel.</p> <p>For 13 years there has been not one complaint of this nature. The black smoke issue does occur on occasion. This could happen on start-up of the boilers when the fuel/oxygen mixture may be incorrect. Very similar to vehicles on the road. The settings are then adjusted and the boiler then burns normally. Afro Fishing does also pay more for LSO fuel. This is the low sulphur oil.</p>
Wiggill, Mervyn - Private (Mr Wiggill has been deregistered due to his passing)	
Registered via email	Registered 25 March 2019
Draft Basic Assessment	
<p>Kindly receive further comment in addition to the concerns below raised by the late MF Wiggill on behalf of us (Mervyn and Carina) as residents at 54 Montagu Street. Many thanks. C Wiggill</p>	

COMMENT / ISSUES	RESPONSES
<p>1. The Marine Impact has not been considered.</p> <p>The Region's marine eco system will be severely and critically impacted upon or should harvesting of the pelagic open water feeding fish be harvested at the tonnage required for the optimal functioning of the proposed plant. No mention is made of how the by-catch will be treated.</p> <p>The fish resources for this region, particularly mid ocean fishing which has been the mainstay of the town's fishing industry since time in memoriam, is because of over fishing, by particularly foreign vessels, severely depleted on what it had been 20-30 plus years ago. Additionally the size of white fish caught today is indicative that the fish is no longer given time to grow to fuller maturity. A leading fish handling company, present in the harbour for 100 years, closed as the operations here were not longer economically viable.</p>	<p>Cape EAPrac: Pelagic fishing quotas are issued on a yearly basis after analysis of the bi-annual biomass surveys. This is referred to as the Total Allowable Catch or TAC. The TAC determines the amount of fish that may be caught in any given year. This TAC is updated during the year as the catch data is submitted. Afro Fishing will obtain fish from fishing boats that are allocated quotas for the industrial fish species.</p> <p>Afro Fishing: Annual fishing research determines the allowable catch for each specie on an annual basis. The fishing activity allowed is therefore done on a basis that ensures a sustainable fishery. There is therefore no increase in activity unless the resource allows for it and not just the building of a new factory.</p> <p>Afro Fishing: I cannot comment regarding the white fish industry but it does appear that this is a stable fishery with hake allowable catches being fairly constant over a long period of time. With regards the 1000 tpd pelagic catches. We are installing a plant capable of 1000tpd as the faster we can work away the fish the better. AF will however only process maybe 30,000 - 50,000 tons annually. The red eye herring biomass estimated in the southern and eastern Cape waters is in excess of 1 million tons, so the quantity we hope to catch and process is very small in comparison to the biomass. Remember also that the Department of Fisheries and the scientific working groups determine the biomass and the allowable catch precisely to ensure that the fishery is sustainably managed. The days of 'wild west' style fishing is long gone.</p>

	COMMENT / ISSUES	RESPONSES
12-Dec-19	<p>The established Afro Fishing Canning Plant, is because of a critical shortage of raw product in our immediate waters, is for some time already, not able to operate at the capacity as originally planned. For the plant to process, product is sourced from much further afield or from north Africa.</p>	<p>Cape EAPrac: The cannery was established due to the movement of fish shoals to the southern and eastern coasts.</p> <p>Afro Fishing: The pelagic fishery has always been regarded as a 'boom or bust' industry. Fish stocks can be low for years and then they recover overnight. Yes, the pilchards for canning is low at the moment but the local catches will improve. The reasons for this are also not overfishing, they are climate and environmentally related.</p>
	<p>If feedstock product is to be caught or harvested far outside of this area, transported here for processing, then the proposed facility should be located elsewhere. An industrial zone, Koega or Humansdorp where direct rail access is available. Not in the heart of the central Mossel Bay harbour, part of a key tourist heritage area, with Residential I properties the main backdrop against the hillside.</p>	<p>Afro Fishing: The fresh fish for the fish meal plant will all be caught locally. We have considered Coega but according to the scientists and their hydro-acoustic survey data, Mossel Bay is central to the anchovy and red-eye herring fishing resource.</p>
	<p>2. Air Impact and Emissions No airflow tests were done. Emissions: Despite reassurances from the report, the fact remains, it is impossible to guarantee an odour/emission free plant. The existing canning plant from time to time experience emission malodour problems. This can be picked up against the hillside.</p>	<p>LAQS: This statement is not correct. No emission measurements were conducted in South Africa as no plant in the country uses RTO technology. On insistence of LAQS, emissions were measured at two fishmeal factories, one in Spain and one in Portugal. These measurements were conducted by independent, accredited companies that specialise in such measurements. The highest of the reported test results was used by LAQS as a conservative approach to calculate total emissions. In addition, the maximum design capacity of the RTO (not the planned maximum flow) was used in the calculation of annual emissions in order to create worst-case conditions. All of the calculations and the air quality impact assessment were based on the maximum calculated capacity and, importantly, on the assumption that the plant will operate for 24 hours per day and 330 days per year. This is a highly unlikely scenario as sufficient fresh fish will not be available throughout the year.</p> <p>Afro Fishing: Actual emissions were sampled and analysed at considerable cost at one of the European reference sites that applies the same technology. The results showed that offensive chemicals were removed to well below detection levels.</p>

COMMENT / ISSUES	RESPONSES
<p>3. Road Access and Noise Pollution: Road infrastructure access leading to the harbour is through central town, and the roads will be under pressure to accommodate the increased heavy truck traffic, contributing to noise and air pollution.</p>	<p>Urban Engineering Please refer to the Traffic Investigation for the relevant details regarding trip generation and traffic distribution. Road pavements are designed according to an equivalent E80 axle load. The actual maximum vehicle axle load is governed by legislation. No vehicles are allowed to exceed the maximum axle load used in the structural design of the road pavement. A pavement management plan is maintained by the local roads authority for the purpose of prioritising road upgrades.</p>
<p>4. Sense of Place Mossel Bay is primarily a tourist town. It can be argued that more permanent employment opportunities can be created through growth in the tourist industry than the employment numbers quoted by the proposed facility. Our harbour is part of the charm of the town and was the space around which the town developed. The Bay of Mossel Bay coastline, pristine beaches and the environs, together with the place the town holds in the historic development of man, are the key attractions for local and international tourists alike.</p>	<p>Cape EAPrac: Heritage Western Cape has confirmed that the proposed development on the site of an existing derelict / defunct premises will not affect the built landscape. See Annexure E1 of the report.</p> <p>TNPA: Sense of place will not be affected as per presentation done by Afro Fishing.</p>
<p>It must be guarded against that a not well placed fishmeal & oil extraction process plant does not destroy our Marine environment, and negatively impact on our tourism industry.</p>	
Background Information Document	
ISSUES OF CONCERN	

COMMENT / ISSUES	RESPONSES
<p>1. It is technologically impossible to build an odour free, and effluent free plant.</p>	<p>LAQS: While this statement is technically correct, it does not mean that it is impossible to build a plant that does not impact negatively on the environment. The only way to have no emissions and/or effluent from industrial activity is to have no industrial activity whatsoever. The RTO technology has been proven to be effective in cutting odours from fishmeal plants to levels where they are not discernible.</p> <p>Cape EAPrac: In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p>The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p>Afro Fishing: This new facility will obviously not be odour free or effluent free without any abatement measures. The odour emissions will however be managed to ensure compliance with national thresholds and more. There will effectively be no effluent discharge to the sea. There will however be effluent that will have to be managed, which will be undertaken under the requirements of the Coastal Waters Discharge Permit.</p>

COMMENT / ISSUES	RESPONSES
<p>2. As the plant is not guaranteeing a 100% feedstock supply from South African trawler men in South African waters, this development must be questioned.</p>	<p>Cape EAPrac: The raw product being imported is used to supplement the cannery's operations currently and will continue as such. This fish is for human consumption and there is no intention to import industrial fish for the fishmeal and fish oil production.</p> <p>Afro Fishing: All the raw material for the fishmeal and oil facility will be caught by local fishing vessels and delivered directly to the factory located in the Port of Mossel Bay</p>
<p>3. The NE corner both as a seascape and a harbour scape are the last reminders of the halcyon days. The potential access for tourism from the NE will be totally obliterated.</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a "strategic harbour" located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>According to the Port Development Plan, all tourist facilities, the so called Waterfront, will be developed on the western side of the port whilst the eastern side will remain commercial fishing and processing.</p> <p>Afro Fishing: The Portnet and Mossel Bay municipality precinct and master plan has always allocated the NE corner for fishing activities. We are not requesting any change to this spatial arrangement and will be working within existing zonings and space allocation.</p>
REASON FOR PARTICIPATION	

	COMMENT / ISSUES	RESPONSES
25-Mar-19	<p>1. I am a resident in Montagu Street and in direct line of sight of the existing I & J factory and warehouses. Therefore with any wind blowing from W/NW thro' North to E/NE, odours and noise will impact on the quality of my life.</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p> <p>Afro Fishing: Without the mitigating measures put in place that may have been the case. However with the RTO unit and noise pollution measures to be installed this will not be the case.</p>
	<p>2. The envisaged the plant will run on various feedstock inputs from local raw fish to imported semi-processed fish meal. The operating parameters will need to be adjusted promoting unplanned and planned odours and effluent discharges.</p>	<p>Cape EAPrac: The design and the technology proposed for this facility are taking into consideration normal and abnormal operational parameters. For example, there are three processing lines proposed for the fishmeal, each of different sizes. This will ensure that if the catches are smaller in volume, only the smaller line is needed to operate and if full production is required, all three lines can be operated simultaneously. The RTO is directly linked via ducting to each of these lines and all pipes, sumps and conveyors are sealed, with openings only at the various ducts. This further minimises any fugitive odours inside the building. The building itself is also designed to have a negative pressure, which means air inside cannot easily escape.</p> <p>Afro Fishing: Please note that only fresh fish caught in the southern cape seas will be processed in this plant, with a small amount of material from the existing cannery.</p>

COMMENT / ISSUES	RESPONSES
<p>3. Given the various feedstock input plus sale and export of the final product and the production throughput envisaged, the impact on the town of “pantech’s” running from the ECape through the town centre, will damage roads, cause congestion and noise pollution.</p>	<p>Urban Engineering: The existing Afro Fishing Cannery is the ideal harbour business from a transportation impact point of view. Raw materials (fish) are delivered to the facility directly from fishing ships and trawlers, minimizing the impact on the surrounding road network. The proposed Fish Meal and Oil Reduction facility is also expected to have a very low impact on the surrounding road network, since the proposed facility is expected to generate very low volumes of vehicular and truck traffic. The expected trip generation rate of the facility is very low, leading to an increase in job opportunities without negatively affecting the road network. Both the existing Cannery and the new proposed facility will be closed during the summer holiday season, when the influx of visitors to the Mossel bay region, leads to increased pressure on the road network.</p> <p>Afro Fishing: The level of truck activity will be similar to what was the situation when the I&J plant was active. The long term plan however is to export fish meal and fish oil direct from the Port of Mossel Bay. Portnet medium term upgrade plans are to upgrade the port to import/export status so containers will not have to be road freighted to Coega or Cape Town ports anymore.</p>

COMMENT / ISSUES	RESPONSES
<p>4. If a percentage can be shipped in given the noise pollution from the winching activity especially at night, will increase the noise pollution and be heard by properties against the hillside. Already the loading and unloading of the oil rig service tugs through the night is clearly audible.</p>	<p>Cape EAPrac: According to the short, medium and long term plans for the port of Mossel Bay, Quay 1 and 2 will remain part of the commercial fishing precinct of this working harbour. According to the 2014 PSDF, areas such as fishing harbours should be targeted for the regeneration and revitalisation of urban economies. The Port of Mossel Bay has also been identified as a “strategic harbour” located within an emerging regional centre. This makes it one of only 3 strategic harbours identified in the Western Cape.</p> <p>According to the Port Development Plan, all tourist facilities, the so called Waterfront, will be developed on the western side of the port whilst the eastern side will remain commercial fishing and processing.</p> <p>Afro Fishing: The Port of Mossel Bay is a working port and the hub of the Mossel Bay economy, similar to the other ports in South Africa. The mission statement of the Port of Mossel Bay is to serve the tourism, oil and fishing industries. Activity in the port will therefore increase in years to come.</p>

COMMENT / ISSUES	RESPONSES
<p>5. The data provided by the developers for the air pollution study is neither comprehensive nor finite and until 100% accurate details can be provided and a reassessment is done, can this project be considered.</p>	<p>LAQS: Unfortunately there is no similar plant in the country from where emission measurements can be done to determine actual emissions from such a process. In compiling the air quality impact assessment, LAQS initially made use of emission factors published by the USEPA (a common practice in cases where actual emissions data is not available). Because of the uncertainty in emissions, LAQS followed a conservative approach to rather overestimate emissions that underestimate them, e.g. where the EPA states that thermal treatment was virtually 100% successful in destroying odours, LAQS assumed a 95% efficiency, etc.</p> <p>It must be noted that emission data was obtained from existing plants in Europe and has confirmed that the impact will be Very Low and will not be detectable outside of the facility. Please see the final Air Quality Impact Assessment report for full details.</p> <p>Afro Fishing: We will work within the confines of all legislation and limits in this regard.</p>
POTENTIAL ALTERNATIVES	

COMMENT / ISSUES	RESPONSES
<p>As the sighting of this plant provides little or no labour or logistics or aesthetic benefit it should be located elsewhere. An industrial zone, i.e. Koega, or at Humansdorp where direct rail access is available. Or alternatively in Angola or Kabinda.</p>	<p>MPBS: A Socio and Economic Impact Study has been commissioned. See results of this study. It is necessary to understand the context of the activity in a working harbour environment.</p> <p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustryia by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>Afro Fishing: The proposal to locate the new plant in Mossel Bay is based on the existing operation of Afro Fishing and the results of the anchovy and red-eye herring spawner surveys. These surveys indicate a high prevalence of industrial fish in the southern cape waters and hence Mossel Bay is ideally located for an offloading and processing facility. It would therefore not be prudent to locate the new facility away from current operations and away from the fishing resource to be targeted.</p>
Wijtman, Huig - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Wijtman, Cora - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Williams, Lucas - DAFF	
Registered as I&AP	Registered 10 November 2019
Williamson, Fiona - Fiona Williamson Attorneys Inc	
Registered via email	Registered 26 February 2019

COMMENT / ISSUES		RESPONSES
Draft Basic Assessment		
21-Nov-19	Line of sight of buildings	<p>Francois van Zyl:</p> <p>I can refer to Visual Impact Statement, where the proposed development was superimposed on photographs taken from various locations in Mossel Bay. It basically just shows the replacement of the dilapidated old I&J buildings, with the new green roofed buildings, as an add-on to the existing AF structures. All new buildings are to be within municipal height restrictions, or any other requirements. It is thus not envisaged that there will be any changes to existing 'line of sight' with respect to the proposed development. If anything, old unsightly structures will be replaced with something more pleasing to the eye.</p>
	Odour control	<p>LAQS:</p> <p>The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>Everybody involved in this project, e.g. Afro Fishing, its environmental consultants, the relevant authorities, etc., are highly conscious of the very sensitive nature of locating a fishmeal factory in Mossel Bay harbour. Everything is, therefore, done to ensure that any emissions from the proposed plant will not impact negatively on the surrounding area, including the detection of odours. Is it possible the odorous emissions may occur? Yes it is, but at such levels that it will not be detectable by the community.</p>
	Increased traffic	<p>Urban Engineering</p> <p>Please refer to the Traffic Investigation for the relevant details regarding trip generation and traffic distribution.</p>
	I own property and don't want to see any devaluation thereof. Concerned regarding the economy of Mossel Bay.	<p>MPBS:</p> <p>Provided that the precautionary measures undertaken by Afro-Fishing are implemented, there is no reason why the operation should negatively impact tourism, property values or sense of place.</p>

COMMENT / ISSUES		RESPONSES
	RTO must be installed - not an option.	<p>Cape EAPrac: Agreed. The installation of the RTO for this project is non-negotiable.</p> <p>Afro Fishing: Afro Fishing accepts that if the project were to go ahead that the installation of the RTO plant is not negotiable.</p>
	Concerned citizenship established to interact with Afro Fishing.	<p>Cape EAPrac: We strongly support the establishment of a Monitoring Forum, as does the Socio-Economic specialist. We have requested that this is made a condition of any authorisation, if issue.</p> <p>Afro Fishing: A monitoring forum will be a good idea. Afro Fishing supports this idea.</p>
Background Information Document		
	More subsistence for poor.	<p>Afro Fishing: This is one of the primary drivers of this project. There will be employment opportunities and the inclusion of a freezing and cold store facility will enable the existing cannery to operate on more days in the year. Currently the cannery operates on average for 110 days in the year. Aspects of this project will now enable it to operate for up to 180 days in the year. This will add the equivalent of another shift and contribute vastly to the socio-economic needs of the community.</p>
	Job creation & lack of education & training.	<p>Afro Fishing: As per above. Yes there will be new staff trained and skilled to operate the new plant.</p>

COMMENT / ISSUES	RESPONSES
<p>Housing issues.</p>	<p>MPBS: The Socio and Economic Impact Study outlines the benefits of this project in detail.</p> <p>Afro Fishing: AF is a proud level 1 B-BEEE contributor. As part of our commitment to transformation, and the growth of our economy, we will continue to support initiatives that will empower the poor, upskill those who need it most, and protect our environment to ensure that we contribute to a prosperous South Africa.</p>
<p>Incorrect information being disseminated.</p>	<p>Cape EAPrac: The Draft BAR is being made available and includes detailed specialist impact assessments related to air quality, socio-economics and traffic.</p> <p>Afro Fishing: It would appear that certain Mossel Bay residents and business people have fed 'false information' into this process. Some social media reporting has also painted a negative picture by distributing incorrect information and even posting images of offal processing plants in Mauritania which have no relation to the proposal at hand.</p>

COMMENT / ISSUES	RESPONSES
<p data-bbox="62 587 91 707">26-Feb-19</p> <p data-bbox="114 778 286 802">Environmental.</p>	<p data-bbox="1099 225 1256 248">Cape EAPrac:</p> <p data-bbox="1099 261 2152 584">In December 2014, the Department of Environmental Affairs (DEA), Coastal Pollution Management notified TNPA and all their lessors that the Coastal Waters Discharge Permit (CWDP) regulations had come into effect and that they should all start with their application processes. This was duly undertaken and included a public participation component. An application was submitted in July 2015 and a CWDP was issued on the 11th September 2017. In compliance with the CWDP ongoing monitoring takes place at the discharge points and SAEON included an additional seasonal monitoring station outside of the harbour approx. 200m from the external outfall as an additional measure. This data is collated and presented to DEA twice yearly.</p> <p data-bbox="1099 632 2141 767">The proposed expansion will require an amendment to the existing permit to accommodate the increased volume of seawater that will be used for cooling purposes in the fishmeal facility. The discharge water will be heated and distilled and is unlikely to contain any additional protein as this is all required for the final protein product.</p> <p data-bbox="1099 815 1245 839">Afro Fishing:</p> <p data-bbox="1099 852 2107 956">Environmental compliance and sustainable fishing are core values of Afro Fishing and we would not be able to operate our business if we were not compliant with regulations and licensing conditions in this regard.</p> <p data-bbox="1099 1019 1167 1043">LAQS:</p> <p data-bbox="1099 1056 2152 1160">The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p data-bbox="1099 1208 2163 1375">The air quality impact assessment, using measured emissions of TMA and H2S and maximum allowed emissions of PM10 particulates, SO2 and NO2, shows that none of the emissions from the plant, i.e. boiler operations, current canning operations and the proposed fishmeal plant, will result in any emission limit or air quality standard being exceeded. The model does not predict the presence of any discernible odours from the proposed plant.</p>

COMMENT / ISSUES	RESPONSES
<p>Unsure of alternatives at this time, depends on various factors and information provided. Possible premises relocation? Mossdustria instead of town?</p>	<p>LAQS: The Air Quality Impact Assessment indicates that no discernible odours would be detectable on Afro Fishing's site if a proper extraction system is designed and the drier gases are treated thermally i.e. by means of the RTO.</p> <p>No alternative technology is considered as RTO treatment of odorous gases in fishmeal plants is the best available technology which has been proven to work.</p> <p>Cape EAPrac: The choice of location are specific to the industry and are as follows: - In order to limit the potential for nuisance odours, fish must be taken directly from the holds into the facility by means of enclosed pipes. Thus a harbour to factory connection is crucial. This has the additional bonus of ensuring a better, higher quality end product. - When offloading occurs from the boat to a truck, the likelihood of the fish being exposed to air and contributing to odours is exponential. - Transport of fish from the harbour to Mossdustria by truck has significant negative implications for traffic in the town. In terms of volume, raw fish will require more trucks than processed fishmeal, raw fish is wet and the potential for spillage is greater.</p> <p>The harbour precinct provides for operational fishing industries and as such is not a residential area. In addition, the plant in Mossdustria has recently had its AEL revoked for non compliance and is no longer operational.</p>
Windvogel, F - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Young, Charl - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Yoyana, Lulama - Private	
Registered as I&AP at public meeting / information session	Registered 20 November 2019
Zietsman, H.J. - Private	
Registered via email	Registered 12 March 2019
Zietsman, Maryks. - Private	
Registered via email	Registered 19 March 2019

COMMENT / ISSUES		RESPONSES
Background Information Document		
19-Mar-19	Comment submitted is identical to that submitted by Mr Aucamp and Ms Botha.	Please see responses as provided to Mr Aucamp and Ms Botha.