



Cape Environmental Assessment Practitioners (Pty) Ltd

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BACKGROUND INFORMATION DOCUMENT (BID) **APPLICATION FOR ENVIRONMENTAL AUTHORISATION**

AFRO FISHING FISH MEAL & OIL REDUCTION FACILITY **Quay 1, Mossel Bay Harbour**

22 FEBRUARY 2019

Introduction

Cape Environmental Assessment Practitioners (Cape EAPrac) has been appointed as the independent Environmental Assessment Practitioner (EAP) to facilitate the legally required Environmental Application Process in terms of the **National Environmental Management Act** (NEMA, Act No 107 of 1998 as amended), the 2014 Environmental Impact Assessment (EIA) Regulations & the **National Environmental Management: Air Quality Act** (NEM:AQA, Act 39 of 2004), for the proposed **development of a fish meal and fish oil reduction facility** on the old I&J properties on Quay 1 of the Mossel Bay Harbour on behalf of the Applicant, **Afro Fishing (Pty) Ltd**.

The competent authority in this case is the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP): George office and the Garden Route District Municipality.

This Environmental Impact Assessment (EIA) Application takes cognisance of the following legislation:

- National Environmental Management Act (NEMA) & the 2014 NEMA EIA Regulations (as amended);
- National Environmental Management: Air Quality Act;
- National Environmental Management: Integrated Coastal Management Act (NEM:ICMA);
- Western Cape Land Use Planning Act; and
- Spatial Planning and Land Use Management Act.

Project Proposal (preferred alternative)

The expansion of the current Afro Fishing facility to include fish meal and oil reduction processes is proposed on the current footprint of the old I&J facility, with a new canning store adjacent to the current Afro Fishing store.

The proposal entails the harvesting of industrial fish, e.g. anchovy, red-eye, etc., from local waters for the sole purpose of producing fishmeal and fish oil.

The expansion project will include the following:

1. Fish meal and oil reduction plant
2. Fish freezing plant

3. Cold store
4. Fish meal warehouse
5. New canned product warehouse

The reduction process will include the following unit operations:

- Cooking
- Pressing
- Liquid-solid separation
- Steam drying
- Waste heat evaporation
- Oil-liquid separation
- Cooling / grinding / bagging
- Boilers for steam generation.

The plant will have a capacity to process 1 000 tons per day of raw fish. The proposed project will produce fish meal and fish oil products for export markets. The project will positively impact local service providers, the Mossel Bay economy, SMME's and ancillary industries. In terms of employment opportunities, the expansion will increase direct employment from 341 to approximately 560 persons.

Afro Fishing (Pty) Ltd envisages an investment of R300-350m in this project. The investment will diversify Afro Fishing into other fisheries, namely anchovy, sardinella and red-eye herring. The project will increase the canned fish production of which a large percentage of the canned fish production goes into the National Schools Nutrition Programme where Afro Fishing supplies 'affordable protein' for school feeding.

The design of the plant, especially the use of RTO (re-generative thermal oxidation) is based on a similar facility, Narciso Dias & Filhos, LDA, located in Peniche, Portugal. The reason for this is due to the similarity in location (seaside town) with tourism as a main driver for the economy. The use of RTO in the plant led to significantly improved odour control management and eliminated offensive odour

problems previously experienced. The RTO destroys Hazardous Air Pollutants (HAPs), Volatile Organic Compounds (VOCs) and odorous emissions that are often discharged from industrial or manufacturing processes.



Location & Site Context

See Location / SDP Plans attached.

Afro Fishing is located on Quay 1 of the Mossel Bay Harbour. The development property is immediately adjacent to the west which was previously utilised by I&J. The existing buildings will be demolished to accommodate the new development which will have a slightly smaller footprint.

The property was put out on tender for commercial / industrial use by Transnet National Ports Authority (TNPA) as owners of the harbour facility. Afro Fishing was awarded the tender to develop the property as per the TNPA's future planning goals for the Mossel Bay harbour.

Planning Context

The harbour is zoned as Transport 1 with various consent uses. The expansion of the Afro Fishing facility to include a fishmeal and oil reduction facility will require consent use and other planning approval from the local municipality.

Environmental Context

The harbour is surrounded by a mixture of developments, including residential, commercial and tourism facilities. This makes it a sensitive site for developments that may negatively impact on people in terms of offensive odours, even though it has an industrial nature in itself.

The entire area has already been significantly transformed and there are sensitive terrestrial biodiversity aspects remaining on the site.

Afro Fishing currently holds a Coastal Waters Discharge Permit in terms of the NEM: ICMA which will need to be amended in order to accommodate discharge from the proposed fishmeal and fish oil facility.

What is the purpose of this document?

The main purpose of this **Background Information Document (BID)** is to:

- Provide potential "Interested and Affected Parties" (I&APs) and Stakeholders with information regarding the proposed development; and

- Explain the way forward for the environmental process.

Basic Assessment (BA) Environmental process

The proposed development triggers the following listed activities in terms of the National Environmental Management Act (NEMA, Act No.107 of 1998 as amended) and 2014 NEMA Regulations (as amended) and the National Environmental Management: Air Quality Act (NEM:AQA, Act 39 of 2004):

NEMA Listing Notice 1 (GN No. R.327):

- Activity 34: The **expansion of existing facilities** or infrastructure for any process or activity where such expansion will result in the **need for a permit or license or an amended permit or license** in terms of national or provincial legislation governing the release of emissions, effluent or pollution. **[The expansion to include the fishmeal / fish oil reduction plant will require an amendment to the current Coastal Waters Discharge Permit and will require a new Air Emissions License]**

NEM:AQA (GN No. R.893):

- Category 10 (Animal Matter Processing): Processes for the rendering, **cooking, drying, dehydrating**, digesting, evaporating or protein concentrating of any animal matter not intended for human consumption at all installations **handling more than 1 ton of raw materials** per day.

The procedures of a **Basic Assessment (BA) Environmental Application Process**, as per the 2014 EIA Regulations (as amended), will be undertaken to seek Environmental Authorisation for the abovementioned activities. If such an EA is issued, the Garden Route District Municipality will consider the issuing of an Air Emissions License for the facility.

Stakeholder Engagement

This BID forms part of the pre-application public participation process (PPP) allowing neighbouring property owners and key stakeholders the opportunity to register as 'Interested & Affected Parties (I&APs)' and consider / comment on the proposal.

Going forward, registered I&APs will be provided an opportunity to review & comment on the Basic Assessment Report (BAR) and Environmental Management Programme (EMPr) when they become available. Input/comments received during process will be considered and responded to in the final report, to be submitted to the competent authority for review and decision-making.

The following steps, amongst others, will be undertaken as part of the EIA Process:

- Identifying potential Interested and Affected Parties ("I&AP's");
- **Advertising** a 'Call for Registration of Interested & Affected Parties (I&APs)' in a local newspaper (*Mossel Bay Advertiser*) with an initial registration and comment period of 30-days, extending from **22 February to 25 March 2019**;

- **Advertising** in a regional newspaper (*Suid Kaap Burger*) with an initial registration and comment period of 30-days, extending from **22 February to 25 March 2019**;
- Placement of **Site Notices** at the site calling for Registration of I&APs;
- Make available the **Background Information Document (BID)** for distribution to potential I&APs and neighbouring land owners, briefly explaining the process and project (**this document**);
- Open and maintain a **Registered Stakeholder database**;
- Undertaking of specialist impact assessments and project team reports;
- Compilation and public availability of the **Basic Assessment Report (BAR)** and **Environmental Management Programme (EMPr)**;
- **Submit** the final reports to DEA&DP for **decision-making** (authorisation with conditions, or refusal);
- Notification of registered I&APs and Stakeholders of **Environmental Decision**, and details of appeal process / period.

Issues & Concerns

The following issues and concerns were raised by the project team for the proposed site, as well as in consultation with the project team, key authorities and/or specialists:

- Potential impact of **offensive odours** on neighbouring land users.

According to the initial Air Quality Impact Assessment, the specialist concluded the following:

It is generally accepted that odours will always be generated during fishmeal production processes. The chance of offensive odour generation can be reduced substantially by taking the following steps:

- Processing of fish within 24 hours of harvesting
- Judicious application of modern technology
- Thorough and frequent maintenance and cleaning of process equipment

If these steps are complemented with an effective extraction system to collect odorous gases and proper treatment of the collected gases is carried out, e.g. by thermal treatment, a minimum of detectable odours should be generated and, if they are, escape the confines of the plant buildings.

The annual average ground-level concentration indicate 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.

This supports the use of the RTO system as used in Peniche, Portugal.

Alternatives

In terms of the NEMA legislation, alternatives must be considered during an environmental assessment. These may be site, activity, or technological alternatives.

The No-Go Alternative (no activities undertaken) must be considered as a baseline against which the impacts of any other Alternatives are measured.

Any other reasonable and/or feasible alternatives identified during the course of this environmental process will be considered and measured against previous development proposals for the site and the no-go alternative.

Stakeholders are requested to provide details of any reasonable and/or feasible alternatives that they may be aware of to ensure that such alternatives can be considered prior to submission of the formal Application to the DEA&DP.

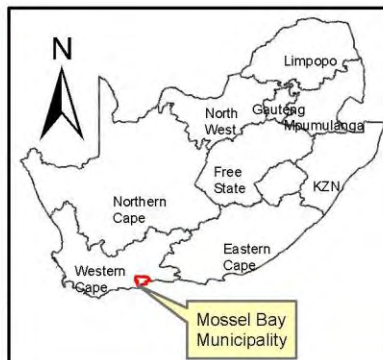
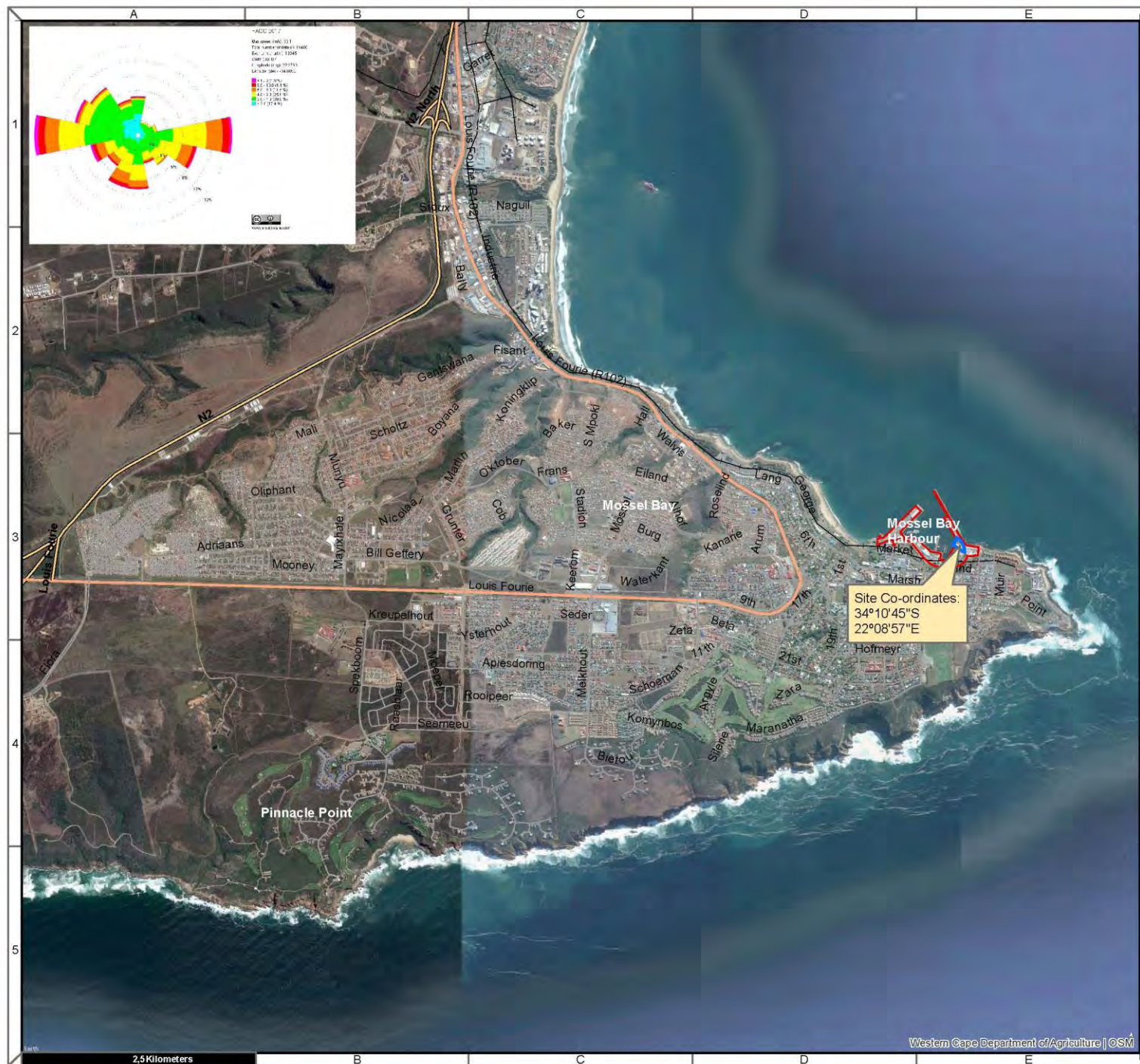
Why and how should you get involved?

Names and details of members of the public who respond to the legal advert &/ notices (calling for Interested & Affected Parties (I&APs) to register) will be captured on the project **Stakeholder Register**. All written comments provided will also be recorded. According to the Guidelines on Public Participation, only those parties that submit their full contact details for registration purposes &/or who submit comment, will be registered. Documentation containing incomplete, or no contact details, may not be considered.

In the event that you (or any other party you may be aware of) have an **interest** in the environmental process, or feel that you **may be affected** by the proposed development, you are invited to **register** as an I&AP for the environmental process, within the 30-day registration period, extending from **22 February to 25 March 2019**. I&APs are requested to submit their full contact details, in writing, to Cape EAPrac at the address provided at the end of this document.

**TO REGISTER AS AN I&AP, PLEASE SEND
YOUR REGISTRATION REQUEST, NAME &
FULL CONTACT DETAILS, AND ANY
PRELIMINARY COMMENTS TO:**
Cape-EAPrac

ATT: Ms Melissa Mackay
PO Box 2070 George 6530
Telephone: 044 874 0365 Fax: 044 874 0432
E-mail: mel@cape-eaprac.co.za



Afro Fishing Mossel Bay Harbour

Legend

- MB_Harbour
- Development Area

Roads

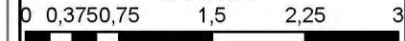
CATEGORY

- HIGHWAY
- MAIN ROADS
- SECONDARY
- STREET
- OTHER
- Railways

Notes

- Map Scale is 1: 40 000 when printed on A3
- Aerial image courtesy of Google Earth Pro 2018
- Imagery date April 2017
- Wind data courtesy of Metar 2017
- Nearest Metar station is George (FAGG) approx. 30kms east

Kilometers



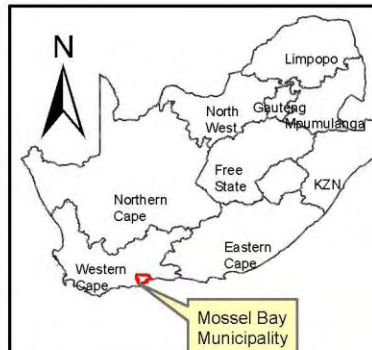
Map Drawn By:	Date	Reference
Melissa Mackay	2018/10/16	MOS569

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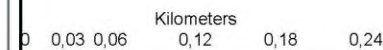
Afro Fishing Mossel Bay Harbour

Legend

- MB_Harbour
- Development Area

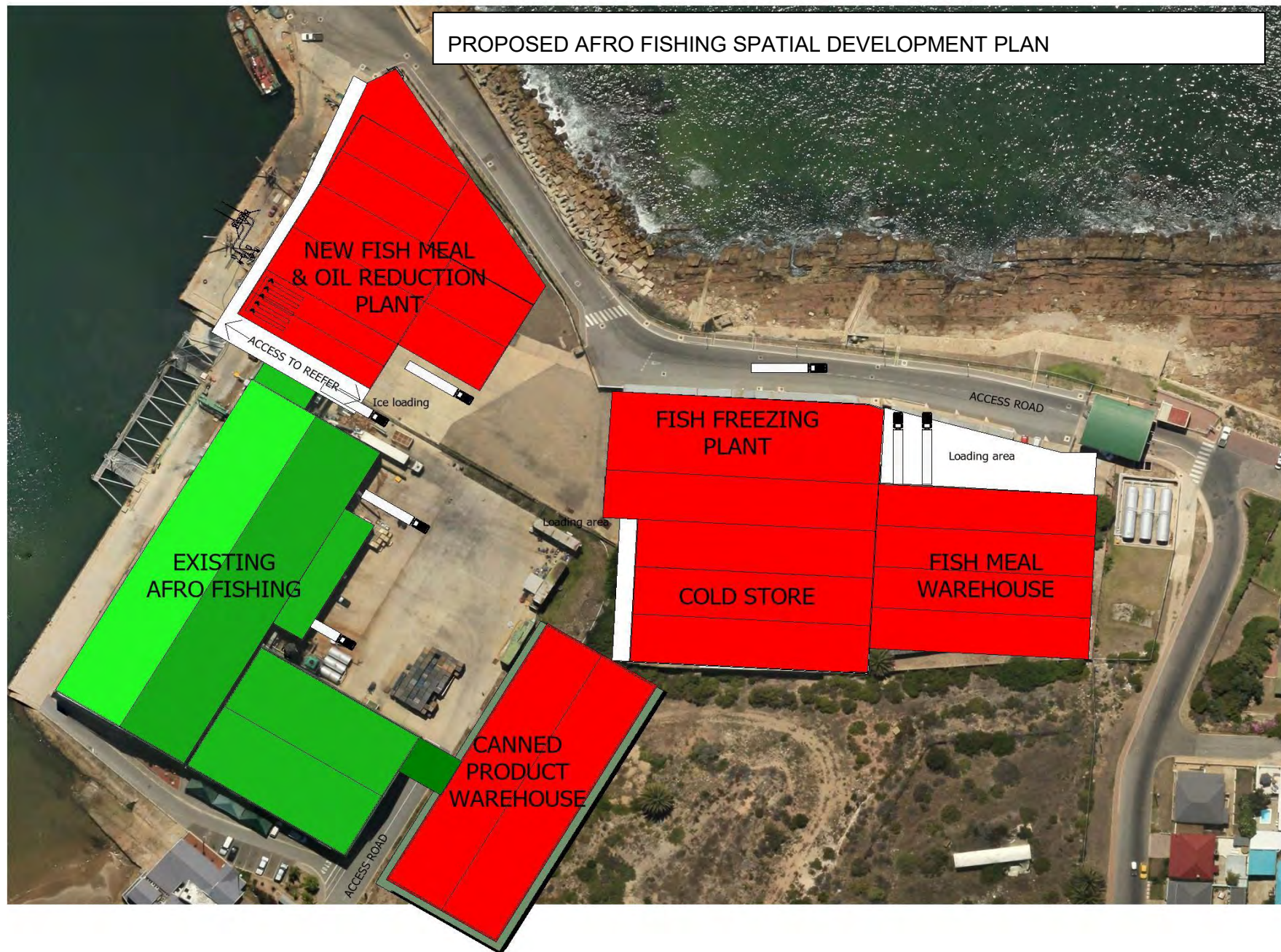
Notes

- Map Scale is 1: 3 500 when printed on A3
- Aerial image courtesy of Google Earth Pro 2018
- Imagery date 11 August 2018



Map Drawn By:	Date	Reference
Melissa Mackay	2019/02/19	MOS569

PROPOSED AFRO FISHING SPATIAL DEVELOPMENT PLAN



ENVIRONMENTAL AUTHORISATION – BASIC ASSESSMENT PROCESS

REGISTRATION / INITIAL COMMENT SHEET on BID

AFRO FISHING FISH MEAL & OIL REDUCTION FACILITY

QUAY 1, MOSSEL BAY HARBOUR

Should you have any preliminary comments and would like to be registered as an Interested and Affected Party ("I&AP"), please complete this form and return it to Cape EAPrac at P.O. Box 2070, George, 6530. Tel: 044 874 0365, Fax: 044 874 0432, Email: mel@cape-eaprac.co.za. Registration may also be done online at www.cape-eaprac.co.za on the active project page.

TITLE & NAME	
REPRESENTING	
POSTAL ADDRESS	
TEL NO.	
FAX NO.	
CELL NO.	
E-MAIL	

NOTE: Submission of incomplete contact details may result in a person/entity not being registered. Please ensure that you complete the above table in full.

COMMENTS (please feel free to submit more pages)

1. List any **key issues or concerns** relating to the proposed development / amendment process.

2. Describe your **reason/motivation** for participating in this environmental process (disclose any interest) **NOTE** **to the 2014 Environmental Regulations (as amended) it is compulsory for I&APs to state their interest in a project/process, thus not providing reasons, may result in a person/entity not being registered.**

3. List any potential (reasonable and/or feasible) **alternatives** for the activity and **state why** you are recommending the alternative(s):

4. List **Interested & Affected Parties** (I&APs) or Stakeholders that you feel should be registered (provide their **full contact details** (name, telephone, fax, email and postal details) and who they represent in order that we may contact them):
