

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 will be 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 This application was subsequently withdrawn on the 10th September 2019 due to timeframe constraints associated with the publishing of air quality data from the European air quality specialists.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 is scheduled for the **20th November 2019** to allow I&APs the opportunity to discuss issues directly the specialist team. Copies of the DBAR will be 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 additional comments will be incorporated into this report and submitted to the DEA&DP for decision making.

COMMENT / ISSUES	RESPONSES
Abrahams, Mushfiqah - Mossel Bay Municipality	
Automatically registered as an I&AP.	Registered 22 February 2019
Attended site meeting with Mr Warren Manuel	6 March 2019
Abrahams, Manie - Department of Health	
Automatically registered as an I&AP.	Registered 22 February 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	

COMMENT / ISSUES	RESPONSES
<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>
<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>

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<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
	<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>	
<p>19-Mar-19</p> <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>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>	
<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. 		

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	<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 practice 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>

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<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>
<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>

COMMENT / ISSUES	RESPONSES
<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.</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>LAQS: Agrees with both these statements.</p>
<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>

COMMENT / ISSUES		RESPONSES
	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>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>
	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>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>
Baartman, Errol - TNPA		
	Automatically registered as an I&AP.	Registered 22 February 2019
Bacon, Craig - Viking Fisheries		
	Automatically registered as an I&AP.	Registered 22 February 2019
Barnard, Morne		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
25-Mar-19	Please note: This comment was translated from Afrikaans. Please see the original comment in the Basic Assessment Report Appendices	
	The Garden Route District Municipality and Mossel Bay Municipality must be investigated for irregularities in issuing of licenses.	<p>Cape EAPrac: The investigation of authorities falls outside of the scope of this Environmental Impact Assessment process.</p>
	Double standards being applied by the authorities.	<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>
Barrat, Helena - Status Mark		
	Registered via email	Registered 25 February 2019
Bartman, Sue - Huckle Street, Mossel Bay		

COMMENT / ISSUES		RESPONSES
	Registered via email	Registered 23 March 2019
Background Information Document		
#####	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		
#####	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>

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	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.	
Black, Dirk - Private		
	Registered via email	Registered 27 February 2019
Background Information Document		
		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. 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.

COMMENT / ISSUES	RESPONSES
<p>Offensive odours - no odours can and will be guaranteed.</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>
<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>

COMMENT / ISSUES	RESPONSES
<p>27-Feb-1</p> <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>
<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>Mossdustria 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 Mossdustria.</p>

COMMENT / ISSUES		RESPONSES
	Why would any town have a dedicated industrial area and then transform their lovely coastal town into a smelly factory?	<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		
27-Feb-19	Please provide the company registration no of Afro Fishing. It was omitted on the BID.	<p>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.</p>
	Planning Context (BID): Please clarify what is meant by "require consent use and other planning approval". Does that include rezoning?	<p>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.</p>
Bosse, Brigid		

COMMENT / ISSUES		RESPONSES
Registered by Marelize Kapp		Registered 25 March 2019
Background Information Document		
Pollution possibilities.		<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>
	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.</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>
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 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>
	<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		
	<p>How tourist activities will be influenced. Coetzee Alberts Architects are the consultants for a new tourist route in the Mossel Bay CBD.</p>	<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>

COMMENT / ISSUES		RESPONSES
22-Mar-19	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, WS - Diaz Court Body Corporate		
	Registered via email	Registered 22 March 2019
Background Information Document		
	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>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.</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>

COMMENT / ISSUES	RESPONSES
<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>
<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>

	COMMENT / ISSUES	RESPONSES
22-Mar-19	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>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>

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>
Bruinders, Quelynné - TNPA	
Automatically registered as an I&AP.	Registered 22 February 2019
Buis, Sarah	
Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document	

COMMENT / ISSUES		RESPONSES
25-Mar-19	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. 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>
	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>
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>
	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>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>

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>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> <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>

COMMENT / ISSUES	RESPONSES
	<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> <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>

COMMENT / ISSUES	RESPONSES
<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>
<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>

COMMENT / ISSUES	RESPONSES
<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>
<p>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>	<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>
<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>	<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>

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COMMENT / ISSUES		RESPONSES
13-Ma	It begs the question again: Why would that be? Is criminal or foul play possibly involved?	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.
	The questions that need to be asked and answered are: 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?	Afro Fishing: See above
	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.	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. 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. 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.

COMMENT / ISSUES	RESPONSES
<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>
<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>

COMMENT / ISSUES	RESPONSES
<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>
<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. 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? 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>

COMMENT / ISSUES	RESPONSES
<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>
<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>

COMMENT / ISSUES		RESPONSES
	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>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
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 an Appendix.		
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 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>
	c. The effect of odour on the CBD residents, the economy and the tourism industry.	<p>LAQS: 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: 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, 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 496 1249 520">Afro Fishing:</p> <p data-bbox="1099 533 2096 596">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 644 1294 668">Francois van Zyl:</p> <p data-bbox="1099 681 2152 928">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>
Coetzee, Janet - DEFF: Fisheries Management		
	Automatically registered as an I&AP.	Registered 16 July 2019
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 an Appendix.		
	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
De Goede, Johan - DEFF: Marine Resources Management		
	Automatically registered as an I&AP.	Registered 16 July 2019
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="62 603 91 719">28-Feb-19</p> <p data-bbox="114 571 1070 671">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 240 1256 264">Cape EAPrac:</p> <p data-bbox="1099 277 2152 378">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 426 2123 563">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 611 1167 635">LAQS:</p> <p data-bbox="1099 647 2152 748">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 761 2123 860">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 908 1245 932">Afro Fishing:</p> <p data-bbox="1099 944 2168 1007">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>
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 an Appendix.</p>	

COMMENT / ISSUES	RESPONSES
<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: 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>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>
<p>Concerned about the effect of the odour on the people in the CBD, the economy and the tourism industry.</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 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>

COMMENT / ISSUES		RESPONSES
Du Toit, Ginny - Private		
Registered via email		Registered 12 March 2019
Background Information Document		
<p>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>		<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>
<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>

COMMENT / ISSUES	RESPONSES
Pollution of the environment.	<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>
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>

	COMMENT / ISSUES	RESPONSES
12-Mar-19	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>
	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>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>
	Perhaps a factory ship out at sea could process and pack the fishmeal.	<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>
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

COMMENT / ISSUES		RESPONSES
Background Information Document		
<p>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.</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>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>	

27-Feb-19

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: 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>
Erasmus, Pieter- Beacon Point Body Corporate		
	Registered via email	Registered 7 March 2019
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>

COMMENT / ISSUES		RESPONSES
	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>
Ferreira, Jacques - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
	Pollution possibilities.	<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		<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>
	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 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
Fisch, MS - Private		
	Registered via email	Registered 20 March 2019
Background Information Document		
Mar-19	<p>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>	<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
20-	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>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>Afro Fishing: Odour will be managed as already explained.</p>
	Kindly regard this objection as NOT NEGOTIABLE.	<p>Cape EAPrac: Thank you for your participation, your objection is noted.</p>
Fordham, Colin - CapeNature		
	Automatically registered as an I&AP.	Registered 22 February 2019
Fourie, Carolina- Private		
	Registered via email	Registered 25 February 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 an Appendix.</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: - 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>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>
<p>Gennari, Enrico - Oceans Research</p>	
<p>Registered via email</p>	<p>Registered 1 March 2019</p>

COMMENT / ISSUES		RESPONSES
Germishuys, Marieth - 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 an Appendix.	
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>
Giliomee, Thys - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 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>
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>
Hill, Harry - Private		
	Registered via email	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<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 2 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.
Holm, Helet - Private		
	Registered via email	Registered 26 March 2019
Background Information Document		
Mar-19	Please note that I am the sister mentioned in the email from my brother, Gys Smalberger.	Cape EAPrac: Thank you for your registration and participation.
	I fully support the reasons stated in his email yesterday.	Cape EAPrac: So noted. Please see the responses provided to his comments below.

COMMENT / ISSUES		RESPONSES
26-N	Could you kindly give me feedback too on plans for developing this factory in Mossel Bay harbour	Cape EAPrac: Email with the BID and initial specialist air quality report was provided to Ms Holm on the 26th March 2019.
Jacobs, Barry - Gourikwa Huis Khoisan		
	Registered via email	Registered 28 February 2019
Jansen van Vuuren, Rikus - Aida Mossel Bay		
	Registered by Celia Beaumont	Registered 28 February 2019
Kapp, Elize - 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 an Appendix.		
25-Mar-19	The issuing of a "coastal discharge permit" which allows this type of pollution in our seas must be investigated for irregularities.	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. 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.

COMMENT / ISSUES		RESPONSES
	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>
Kapp, Marelize - 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 an Appendix.	
ar-19	The pollution of the sea due to stick water by Afro Fishing causing possible pollution in the sea 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: No stikwater will be released to the sea.</p>

COMMENT / ISSUES		RESPONSES
25-M	<p>Concerned about pollution effects on the environment, the sea life and the townspeople.</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> <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>
Kapp, Bennie - Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>25-Mar-19</p> <p>Concerned about the possible pollution effects the industry can 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 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 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
	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: 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>
Kellerman, Christo - Private		
	Registered via email	Registered 28 February 2019
Kloppers, Lizette - Private		
	Registered via email	Registered 20 March 2019
Kotze, D - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Kruger, Eddie- Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Kruger CJ - 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.
Lamprecht, Gustav- Private		
	Registered via email	Registered 26 March 2019

COMMENT / ISSUES		RESPONSES
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.
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.
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 an Appendix.		

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>
Lodge, Karol - Private		
	Registered via email	Registered 25 March 2019
Loubser, Martie - Lower Town Neighbourhood Watch		
	Registered via email	Registered 4 March 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
Manuel, Warren - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Marais, Tersia - SMART		
	Automatically registered as an I&AP.	Registered 26 February 2019
Background Information Document		

COMMENT / ISSUES		RESPONSES
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
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 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
25-Feb-19	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>
	Congestion in the harbour.	<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. 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>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>
<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>

COMMENT / ISSUES		RESPONSES
	As an alternative use Mossdustria. Heavy industry already located there.	<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>
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
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

COMMENT / ISSUES		RESPONSES
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.
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 an Appendix.		
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 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>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>
Mpumela, Johnson - Kwantu Qawula Matyathanga Initiative : 877-177NPO		
	Registered via email	Registered 3 March 2019

COMMENT / ISSUES		RESPONSES
Background Information Document		
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.
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.	
	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.	

COMMENT / ISSUES		RESPONSES
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
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 an Appendix.</p>		
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 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: 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
	There is a current facility in Mossdustrria, possible alternative location.	<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 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>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, Catinka- 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>

COMMENT / ISSUES	RESPONSES
<p>The effect of smelling in 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>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>
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 an Appendix.	

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: No stikwater will be released to the sea.</p>
	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		

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 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>
Olivier, Rudi- Private		
Registered by Marelize Kapp		Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES		RESPONSES
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>
Page, Marius - Private		
	Registered via email	Registered 7 June 2019
Pauw, Christiaan - Private		
	Registered via email	Registered 26 February 2019
Pauw, Jeanette - Private		
	Registered via email	Registered 26 February 2019
Ploog, Otto- 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 an Appendix.</p>		

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
<p style="text-align: center; vertical-align: middle;">25-Mar-19</p> <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> <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
	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		
	Registered via email	Registered 25 March 2019
Background Information Document		

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>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. 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>

COMMENT / ISSUES		RESPONSES
25-Mar-19	<p>We have a property in Hout Bay too and the unpleasant odours from the fishmeal factory is unbearable / horrible.</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 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 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>Afro Fishing: 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>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>Cape EAPrac: See responses above relating to air quality and traffic.</p> <p>Afro Fishing: 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
	<p>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>	<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>
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
Proudfoot, Mandi- Private		
	Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document		
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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: 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		
<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 an Appendix.</p>		

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, 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.
Rice, Don - Private		
	Registered via email	Registered 25 February 2019
Roux, Peggy - Heiderand Neighbourhood Watch		
	Registered via email	Registered 4 March 2019
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
25-Mar-19	Cares about the possible pollution effect 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 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. 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 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>
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 an Appendix.	
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.	<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>
Schoeman, Johan - Garden Route District Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Background Information Document		
	This is a very sensitive area i.to. residential, commercial and tourism activities.	<p>LAQS: 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: 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="text-align: center; vertical-align: middle;">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;” 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. 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>	
<p>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>	<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>	

COMMENT / ISSUES		RESPONSES
	Ensure notification of DEA&DP, local municipality, Dept. of Health, Land Use Planning and Heritage Society.	Cape EAPrac: Please refer to the I&P List for all registered stakeholders.
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 	<p>Cape EAPrac:</p> <p>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.</p>
		<p>Cape EAPrac:</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:</p> <p>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.</p>

COMMENT / ISSUES		RESPONSES
<p>25-Mar-19</p> <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 eon 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 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>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 is 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>
Smalberger, Gys - Private	
Registered via email	Registered 25 March 2019
Background Information Document	
As residents of Mossel Bay (born and bred) we do not support the fish meal factory should any smells arise from it.	<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>

COMMENT / ISSUES	RESPONSES
<ul style="list-style-type: none"> • 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>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 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. 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 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>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>
Smit, Heinrich- 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 an Appendix.</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		
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 an Appendix.		

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
<p>Concerned about the pollution effect on Mossel Bay, the environment and sea life as well as 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 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>
Stemmet, Gabriel - Private	
Registered via email	Registered 18 March 2019
Background Information Document	

COMMENT / ISSUES		RESPONSES
	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 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>Afro Fishing: The emissions will comply with all air pollution limits and thresholds so no persons constitutional right will be violated.</p>
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: - 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>
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	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>Cape EAPrac: Afro Fishing do not nor will they be transporting wet (raw) fish and as such no leakage will take place.</p>
Swanepoel, Elise - Private		
	Registered via email	Registered 26 February 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
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>
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 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>Swanepoel, Deidre - Community Police Forum</p>	
<p>Registered via email</p>	<p>Registered 25 February 2019</p>
<p align="center">Background Information Document</p>	

COMMENT / ISSUES		RESPONSES
25-Feb-19	Crime and heightened criminal activity in the harbour and Central Business District.	<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 2 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>
	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>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
	Suggest Mossdustria as an alternative. Controlled and correctly zoned. Industry grouped there already.	<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
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
Background Information Document		

COMMENT / ISSUES	RESPONSES
<p>The impact of air quality, which is difficult to measure ;</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>Afro Fishing: Correct, air quality has always been difficult to measure. It is for this reason that stringent licensing procedures are in place.</p>
<p>the difficulty of maintaining high long-term operational standards;</p>	<p>Afro Fishing: Operational standards normally improve over time as regulations become more stringent.</p> <p>LAQS: Agrees with Afri 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.</p>

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 Walt, Petrus - Private	
Registered by Marelize Kapp	Registered 25 March 2019
Background Information Document	

	COMMENT / ISSUES	RESPONSES
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> <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 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
	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:</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 an Appendix.	
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.
Van der Walt, Adel - Private		
	Registered by Marelize Kapp	Registered 25 March 2019

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 an Appendix.</p>		
<p>-Mar-19</p>	<p>Possible pollution of sea in the vicinity of 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: 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 Dyk, Leon - Bo-Dorp Neighbourhood Watch		
	Registered via email	Registered 25 February 2019
Background Information Document		
	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>

COMMENT / ISSUES	RESPONSES
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. 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>
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>

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 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>
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>
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>

COMMENT / ISSUES		RESPONSES
25-Feb-19	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>
	Disruption of tourist and holiday trade	<p>Cape EAPrac: 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: 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: Thank you for your participation.</p>

COMMENT / ISSUES	RESPONSES
<p>Wind direction and location of suburbs directly adjacent to the proposed activity are a concern.</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>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>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:</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. 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>
Van Huyssteen, George - 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 an Appendix.</p>	

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: Please supply details of the irregularities referred to. There should be other forums to address these allegations.</p>
	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 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 Tonder, Annalie - Private		
Registered by Marelize Kapp		Registered 25 March 2019
Background Information Document		

COMMENT / ISSUES	RESPONSES
<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> <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 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. As a result there is no reason why the walk-way should become any less desirable.</p>

COMMENT / ISSUES		RESPONSES
25-Ma	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 Wyk, Gert - 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 an Appendix.</p>	
<p>25-Mar-19</p> <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>

COMMENT / ISSUES	RESPONSES
<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 Zyl, Janine- Private	
Registered by email	Registered 19 March 2019
Background Information Document	

COMMENT / ISSUES	RESPONSES
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="62 576 91 699">19-Mar-19</p> <p data-bbox="114 603 1077 703">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 236 1178 260">MPBS:</p> <p data-bbox="1099 272 2168 408">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 459 1256 483">Cape EAPrac:</p> <p data-bbox="1099 496 2168 703">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 754 2168 855">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 906 1249 930">Afro Fishing:</p> <p data-bbox="1099 943 2168 1078">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>	
<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 an Appendix.</p>	

COMMENT / ISSUES		RESPONSES
12-Mar-19	<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 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>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>
	<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>

COMMENT / ISSUES		RESPONSES
Venter, Carel - Mossel Bay Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Viljoen, Nina - Eden District Municipality		
	Automatically registered as an I&AP.	Registered 22 February 2019
Weijters, Beverley - Private		
	Registered via email	Registered 14 August 2019
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
Background Information Document		
07-Nov-19	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?	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.
	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.

COMMENT / ISSUES	RESPONSES
<p>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.</p>	<p>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.</p>
<p>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 . . .</p>	<p>Cape EAPrac: Please read the reports.</p>
<p>Attachment articles were included with the email but have not been included in this report. Please see Annexure F4 for copies of the email.</p>	
	<p>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..</p>
<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>

COMMENT / ISSUES	RESPONSES
<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>
<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>

COMMENT / ISSUES	RESPONSES
<p>06-Nov-19</p> <p>To further rip the ocean of healthy native fish in order to produce fishmeal for the unsatiated 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>
<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>

COMMENT / ISSUES	RESPONSES
<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>
<p>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>	<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>
<p>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>	<p>Cape EAPrac: Your correspondence has been received and you are registered as an I&AP.</p>

COMMENT / ISSUES		RESPONSES
19-Mar-19	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>
Wiffen, Albert - Private		
	Registered via email	Registered 25 February 2019
Wiggill, Carina - Heritage Society		
	Registered via email	Registered 24 March 2019
Background Information Document		
	ISSUES OF CONCERN	

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	
Registered via email	Registered 25 March 2019
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
<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 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>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>	

25-Mar-19

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 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>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>Williamson, Fiona - Fiona Williamson Attorneys Inc</p>	
<p>Registered via email</p>	<p>Registered 26 February 2019</p>
<p>Background Information Document</p>	

COMMENT / ISSUES	RESPONSES
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>
Housing issues.	<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 2 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>
Incorrect information being disseminated.	<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 style="text-align: center;">26-Feb-19</p> <p>Environmental.</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: 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>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
	<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>
Zietsman, H.J. - Private		
	Registered via email	Registered 12 March 2019
Zietsman, Maryks. - Private		
	Registered via email	Registered 19 March 2019
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.