



forestry, fisheries
& the environment

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

SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE ENVIRONMENTAL CONTROL OFFICER SUMMARY REPORT 30



September 2024



ANCHOR
environmental

Cover photo: André de Villiers

SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE ENVIRONMENTAL CONTROL OFFICER SUMMARY REPORT 30

September 2024

Report prepared for:

Department of Forestry, Fisheries and the Environment

Branch: Fisheries Management



**forestry, fisheries
& the environment**

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

by:

Anchor Research & Monitoring (Pty) Ltd

8 Steenberg House, Silverwood Close, Tokai, South Africa

www.anchorenvironmental.co.za



Citation: Anchor Research & Monitoring (Pty) Ltd. 2024. Saldanha Bay Aquaculture Development Zone Environmental Control Officer ADZ Summary Report 30. Specialist Report no. 2014/30_1c prepared by Anchor Research & Monitoring (Pty) Ltd for the Department of Forestry, Fisheries and the Environment Branch: Fisheries Management. 31pp.

TABLE OF CONTENTS

TABLE OF CONTENTS	I
LIST OF ABBREVIATIONS	II
PROJECT TEAM	III
DETAILS OF THE ENVIRONMENTAL CONTROL OFFICER.....	III
DETAILS OF THE INDEPENDENCE IN TERMS OF CHAPTER 5 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT OF 1998III	
COMPLIANCE WITH REGULATION 34 OF THE EIA REGULATIONS, 2014.....	IV
I INTRODUCTION	I
1.1 SCOPE AND PURPOSE.....	I
1.2 ASSUMPTIONS AND LIMITATIONS OF THE AUDIT	I
2 THE SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE	2
2.1 INTRODUCTION AND BACKGROUND	2
2.2 SITE AND PROJECT DESCRIPTION.....	3
2.3 OPERATORS IN THE ADZ.....	7
3 ECO AUDITS	8
3.1 APPROACH AND METHODOLOGY	8
3.2 PROGRESS WITH PARTIAL OR NON-COMPLIANCES.....	8
3.3 ACTIVITIES IN THE ADZ — AUGUST 2024.....	9
3.3.1 <i>Farm inspections</i>	9
3.3.2 <i>Pepper Bay Jetty</i>	9
3.3.3 <i>Decommissioning</i>	9
3.4 SUMMARY OF COMPLIANCE WITH THE EA AND EMPr.....	10
3.5 FARM MAINTENANCE PLAN FEEDBACK	11
3.5.1 <i>Requa Enterprises</i>	11
3.5.2 <i>Pluto Mussels and Trading</i>	11
3.5.3 <i>MMM Agriconsult</i>	12
3.5.4 <i>Xesibe Aquaculture Project</i>	12
3.6 FARM MONITORING REPORTS (FMRS)	12
3.7 BEACH MONITORING BY OPERATORS.....	13
3.8 BEACH INSPECTION BY ECO.....	15
3.9 INCIDENTS.....	17
4 ADZ MANAGEMENT	19
4.1 BAY USER SAFETY	19
4.2 BIVALVE PRODUCTION VOLUMES	19
4.3 ENVIRONMENTAL MONITORING.....	19
5 RECOMMENDATIONS	20
5.1 GENERAL RECOMMENDATIONS	20
5.2 EVALUATION OF EMPr	21
6 CONSULTATIONS AND COMMUNICATIONS	22
6.1 CONSULTATIONS.....	22
6.2 COMMUNICATIONS	22

LIST OF ABBREVIATIONS

ADZ	Aquaculture Development Zone
AMC	Aquaculture Management Committee
Anchor	Anchor Research & Monitoring (Pty) Ltd
BB	Big Bay
BOM	Blue Ocean Mussels
BSASA	Bivalve Association of South Africa
BSP	Blue Sapphire Pearls
C	Compliant
CF	Consultative Forum
DFFE	Department of Forestry Fisheries and the Environment
EA	Environmental Authorization
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan (for individual farms)
EMPr	Environmental Management Programme
ETP	Endangered, Threatened and Protected Species
FMR	Farm Monitoring Report
MLRF	Marine Living Resources Fund
MSC	Marine Stewardship Council
NC	Non-compliant
OBN	Outer Bay North
OBS	Outer Bay South
PC	Partial Compliance
PLU	Pluto Mussels
Requa	Requa Enterprises
SAMSA	South African Maritime Safety Authority
SB	Small Bay
SBM	Saldanha Bay Municipality
TNPA	Transnet National Ports Authority

PROJECT TEAM

DETAILS OF THE ENVIRONMENTAL CONTROL OFFICER

Name of the auditor	André de Villiers
Contact:	(021) 701 3420
Postal address:	8 Steenberg House, Silverwood Close, Tokai, Cape Town, South Africa, 7945
E-mail:	SaldanhaADZECO@dffe.gov.za
Qualifications:	M.Sc. Zoology

Name of the audit reviewer	Amy Wright
SACNASP Reg No.	131256 (Professional Natural Scientist)
Postal address:	8 Steenberg House, Silverwood Close, Tokai, Cape Town, South Africa, 7945
Telephone:	(021) 701 3420
E-mail:	amy@anchorenvironmental.co.za
Qualifications:	M.Sc. Biological Sciences

DETAILS OF THE INDEPENDENCE IN TERMS OF CHAPTER 5 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT OF 1998

Box 1: Declaration of Independence of Environmental Control Officer

I, Francois André de Villiers hereby declare that I have no conflicts of interest related to the work of this report. Specifically, I declare that I have no personal financial interests in the property and/or development being assessed in this report, and that I have no personal or financial connections to the relevant property owners, developers, planners, financiers, or consultants of the development.



23 September 2024

Box 2: Declaration of Independence of Reviewer

I, Amy Grace Wright hereby declare that I have no conflicts of interest related to the work of this report. Specifically, I declare that I have no personal financial interests in the property and/or development being assessed in this report, and that I have no personal or financial connections to the relevant property owners, developers, planners, financiers, or consultants of the development.



23 September 2024

COMPLIANCE WITH REGULATION 34 OF THE EIA REGULATIONS, 2014

The National Environmental Management Act, 1998 (NEMA, Act 107 of 1998) provides for co-operative environmental governance of South Africa. As promulgated under NEMA (sections 24(5) and 44), the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) are the key regulatory instrument to manage and mitigate environmental impacts caused by any activities or new developments with the potential to affect the environment. Anchor Research and Monitoring carries out audits in terms of Regulation 34 of the EIA Regulations 2014 (as amended) and the following should be noted:

- Anchor Research and Monitoring (Anchor) follows the prescribed format for audit reports listed under Regulation 34 of the amended EIA Regulations (Table 1.1).
- Anchor will report on compliance achieved and adequacy of the Environmental Management Programme (EMPr).
- Anchor does not assume the responsibility of ensuring compliance to all other prescriptions listed under Regulation 34 of the EIA Regulations (such as seeking amendment to the EMPr or associated licences/permits). Ensuring compliance is the obligation of the proponent.

Table 1.1.. Legal requirements for Audit Reports per Appendix 7 as prescribed by the EIA Regulations, 2014.

Content of an Environmental Audit report	Section of this report
Details and expertise of independent ECO and author of this audit report.	Project team
Declaration that the independent auditor is independent.	Project team
Scope and the purpose of environmental audit report.	Section 1.1
Methodology adopted in preparing the environmental audit report.	Section 3.1
Evaluation of the ability of the EMPr, and in the case of a closure activity, the closure plan to sufficiently: 1. Provide for continued avoidance, management, and mitigation of environmental impacts and at closure. 2. Ensure compliance with EA, EMPr and, in the case of a closure activity, the closure plan.	Section 5.2
Description of any assumptions, uncertainties, or gaps in knowledge.	Section 1.2
Description of any consultation process undertaken for this audit report.	Section 6
A summary and copies of comments received during any consultation process.	Section 6.1 Communications register
Any other information requested by the competent authority.	Section 6.1

I INTRODUCTION

I.1 SCOPE AND PURPOSE

This Environmental Control Officer (ECO) summary report provides feedback on Saldanha Bay Aquaculture Development Zone (ADZ) compliance with the Environmental Authorisation (EA) and approved Environmental Management Programme (EMPr). This summary report is distributed to Operators, members of the Consultative Forum (CF), members of the ADZ Management Committee (AMC) and the Department of Forestry, Fisheries and the Environment (DFFE): Compliance Monitoring Directorate. The two primary purposes of this report include:

- Ensuring stakeholders are updated on ADZ activities; and,
- Highlighting areas for improvement in ADZ activities to allow for adaptive management.

This document is intended to highlight significant issues and summarised monthly audits of the ADZ and individual farms (this report is for the August 2024 audit period). The summaries are drawn from the monthly ECO compliance and site inspection reports which are issued to the AMC and individual farms. The monthly ECO compliance and site inspection reports are retained by the DFFE, ECO and AMC for reference as they contain proprietary information.

I.2 ASSUMPTIONS AND LIMITATIONS OF THE AUDIT

The audit findings are based on information relayed in documentation to the ADZ ECO by Operators, email correspondence, in-person interviews, as well as observations made during physical site inspections, at a specific point in time. Although the site inspection can reveal evidence of activities carried out during the month for which the audit covers, it cannot fully show the auditor what activities have been carried out on site. The auditor, therefore, must rely on observations made on the day of the audit as well as the information provided by the Operators, proponent, and other relevant stakeholders in order to make conclusions regarding compliance during the preceding month.

It should be noted that the role of the ADZ ECO is to independently monitor compliance, to implement the Audit Standard, as well as to provide input and guidance to the DFFE Project Management Team on a strategic level. Due to the independent nature of the ADZ ECO role, the ECO appointment is not to enforce compliance but to monitor. Compliance with the provisions contained in the EMPr, EA, Permit or any condition imposed by the environmental approvals shall become the responsibility of DFFE. The following Branches and Directorates of DFFE that are considered responsible for compliance for this project include DFFE: Chief Directorate Aquaculture and Economic Development (now Chief Directorate: Aquaculture Development and Freshwater Fisheries), and DFFE: Chief Directorate Sector Compliance and Chief Directorate Sector Enforcement under Branch: Regulatory Compliance and Sector Monitoring.

2 THE SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE

2.1 INTRODUCTION AND BACKGROUND

Mussel farming has occurred in Saldanha Bay since 1981 and was subsequently followed by oyster farming in the early 2000s. As the development and expansion of sea-based aquaculture activities comprise a number of Listing Notices in terms of the National Environmental Management Act, 1998 (NEMA) (No. 107 of 1998, as amended), these activities require that an Environmental Impact Assessment (EIA) process be undertaken to obtain Environmental Authorisation (EA) from the Department of Forestry, Fisheries and the Environment (DFFE). This process can be arduous and costly, which presents a barrier to entry. Therefore, to facilitate investment and development of additional aquaculture in the Bay, the then Department of Agriculture, Forestry and Fisheries (DAFF) undertook the establishment of a sea-based Aquaculture Development Zone (ADZ) in Saldanha Bay.

The Branch Fisheries Management (now DFFE: Fisheries Management) conducted an EIA and obtained an EA for the ADZ in Saldanha Bay on 8 January 2018, which (after appeals) was upheld on 7 June 2018. The DFFE: Fisheries Management must appoint an independent Environmental Control Officer (ECO) during the construction and operational phases of the ADZ, in terms of condition 29 of the EA and condition 1 of Table 4-2 of the EMPr (see Table 2.1 for ADZ ECO appointments to date). The role of the ADZ ECO is to monitor compliance with stipulations in the EA and EMPr for the construction and operational phases of the ADZ.

Table 2.1. ADZ ECO appointments to date.

Company name	ECO	Period
Ecosense CC	Errol Cerff	September 2018 to August 2019
SRK Consulting (South Africa) (Pty) Ltd.	Kelly Armstrong	September 2019 to February 2020
Errol Cerff	Errol Cerff	March 2020 to September 2020
Errol Cerff	Errol Cerff	October 2020 to September 2021
Errol Cerff	Errol Cerff	October 2021 to March 2022
Anchor Research & Monitoring (ARM)	Jen Keightley	April 2022 to May 2023
	Julia Ndou	June 2023 to May 2024
	Amy Wright	June 2024 to August 2024
	André de Villiers	August 2024 to March 2025

The EA and EMPr have undergone several amendments since the inception of the ADZ, which have been incorporated into the ECO audit scope. The audit scope includes the original EA and its amendments and the most recent amendment of the EMPr. The original EA was issued on 8 January 2018 and amendments to the EA were issued on 10 July 2019 and 14 September 2020 (DEA ref. 14/12/16/3/3/1/1728, 14/12/16/3/3/1/1728/AMI and 14/12/16/3/3/1/1728/AM2, respectively). The latest EA amended (14/12/16/3/3/1/1728/AM3) was issued on the 02 May 2024, with no appeals received to date. The original approved EMPr is dated August 2017 and has been amended three times in May 2020, June 2021, and June 2022. No changes to the EMPr

were recommended by the ECO or the annual external auditors in June 2023 or June 2024, and the EMPr will remain unchanged for 2024. The next review of the ADZ EMPr is scheduled for June 2025.

The Marine Living Resources Fund (MLRF) under the auspices of DFFE: Branch Fisheries Management has appointed Anchor Research & Monitoring (Pty) Ltd (Anchor) as ECO for the Saldanha Bay ADZ for a period of three (3) years. This document is intended to highlight significant issues only and summarised monthly audits of the ADZ and individual farms.

2.2 SITE AND PROJECT DESCRIPTION

Saldanha Bay is located on the West Coast, approximately 120 km north of Cape Town and supports many economic activities. The Port of Saldanha is South Africa's premier iron ore export port and supports a number of industrial operations in the area. An aquaculture industry predominantly reliant on bivalves was established in Saldanha Bay prior to the establishment of the ADZ. Saldanha Bay is considered an historically important area for fishing activity and multiple fish processing plants are located therein. It is also a tourist destination and caters to various water-based tourism.

When the ADZ was originally proposed the Basic Assessment identified issues of concern including changes to the water quality, visual landscape, and productivity of the Saldanha Bay and Langebaan Lagoon environments. Measures to mitigate such impacts were detailed in the Environmental Management Programme (EMPr) and were made mandatory in the Environmental Authorisation (EA). A phased approach to production was adopted to monitor the impacts of expanding aquaculture before production levels were increased. The phased approach also allowed time to determine whether the mitigation measures had the desired effect of limiting impacts and only if mitigation measures proved effective could production be increased.

The Saldanha Bay ADZ comprises 4 precincts, namely Small Bay (SB), Big Bay (BB), Outer Bay North (OBN), and Outer Bay South (OBS) (Figure 2.1). The BA Report summarised the scope for expansion in the ADZ and comprised a mix of finfish and bivalve farms (Table 2.2). Details of each existing lease are depicted in Figure 2.2 and Figure 2.3. Note that there are two lease areas in OBN that are unallocated and have been advertised for lease applications by Transnet National Ports Authority (TNPA). Sea-based activities associated with aquaculture in the ADZ include:

- Servicing and maintenance of aquaculture structures (such as rafts, lines, cages).
- Harvesting of cultivated species.
- Initial processing of bivalves, including de-clumping and grading, typically on the raft or support vessel.
- Vessel trips between the shore and aquaculture areas.

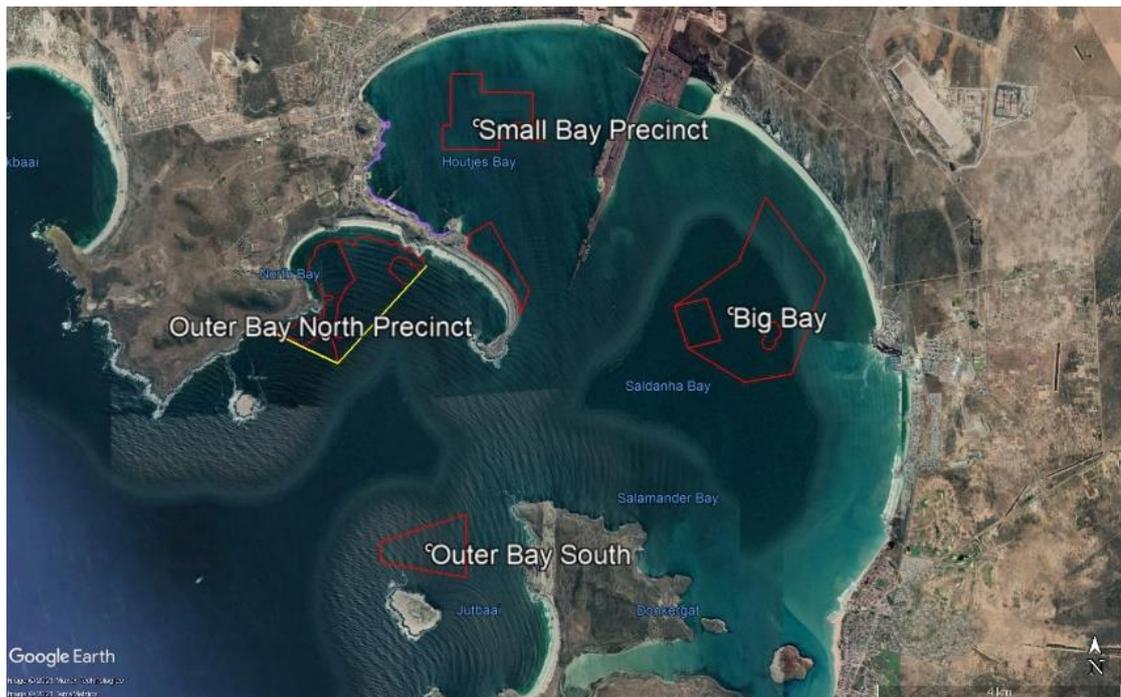


Figure 2.1. Saldanha Bay ADZ precincts.

Table 2.2. Scope for expansion in the ADZ.

Precinct	ADZ Area (ha)	Area suitable for bivalve cultivation (ha)	Area suitable for fish and bivalve cultivation (ha)
Small Bay (SB)	163	163	-
Big Bay (BB)	409	367	42
Outer Bay North (OBN)	216	76	140
Outer Bay South (OBS)	96	-	96
Total	884	606	278



Figure 2.2. (Left) Bivalve culture in Small Bay (SB) and (right) mixed bivalve and finfish culture in Big Bay (BB).

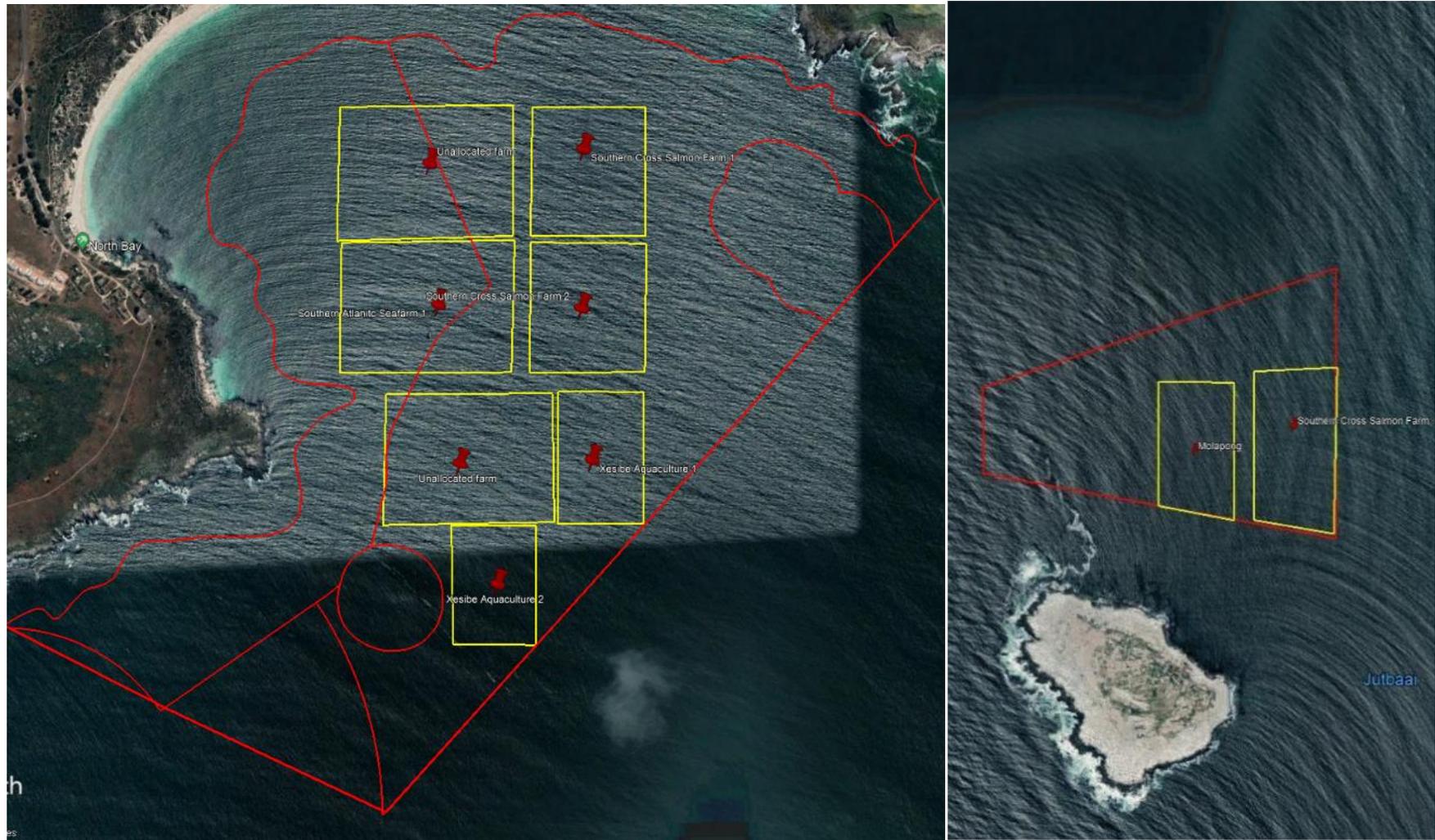


Figure 2.3. (Left) Bivalve culture in Outer Bay North (OBN) and (right) finfish culture in Outer Bay South (OBS).

2.3 OPERATORS IN THE ADZ

An essential aspect to assessing actual impact and possibility of expanding operations relies on accurate production data received from each farm. Farms submit production figures in the form of a monthly Farm Monitoring Report (FMR) to the ADZ ECO and DFFE. As such all farms are required to submit FMRs in terms of the aquaculture permit. Since this is essential to the monitoring of impacts, tracking compliance with this requirement will form part of the ADZ ECO duties even though this is not specified in the EMPr. A list of Operators in the ADZ as of April 2024 (beginning of the 3rd annual cycle in the ARM ECO contract) is presented in Table 2.3.

Table 2.3. Operators in the Saldanha Bay ADZ.

Farm name	Species	Precinct	Right No. MAQUA
African Olive Trading 232 (Pty) Ltd	Mussels	SB	1027
Aqua Foods SA (Pty) Ltd	Mussels/ oysters	SB & BB	1029
Blue Lagoon Products (Pty) Ltd	Oysters	BB	1057
Blue Ocean Mussels (Pty) Ltd	Mussels/ Oysters	SB	11828 & 0004
Blue Sapphire Pearls CC	Mussels / Oysters	SB	0006
Imbaza Mussels (Pty) Ltd	Oysters	SB	0019
K2019005713 (Pty) Ltd	Mussels	BB	1053
K2019005725 (Pty) Ltd	Mussels	BB	1052
Lagoon Aqua	Oysters	BB	1057
Madima General Agriculture Trading (Pty) Ltd	Mussels	BB	1048
Molapong Aquaculture (Pty) Ltd	Salmon	BB	1033
Mika Growers (Pty) Ltd	Mussels	BB	1047
MMMagri Consult (Pty) Ltd	Mussels	BB	1045
Pluto Mussels and Trading (Pty) Ltd	Mussels	BB	1051
Requa Enterprises (Pty) Ltd	Mussels	OBN	1035
Saldanha Bay Oyster Company (Pty) Ltd	Oysters	BB	0012 & 0007
Salmar Trading (Pty) Ltd	Oysters	SB	1032
Simunye Mussels (Pty) Ltd	Mussels	BB	1047
Southern Atlantic Sea Farms (Pty) Ltd	Mussels	BB / OBN	1028
Southern Cross Salmon Farming (Pty) Ltd	Mussels	OBN	1037
Ulwazi Kukutya (Pty) Ltd	Mussels	BB	1050
West Coast Aquaculture (Pty) Ltd	Mussels/ oysters	SB & BB	0003
West Coast Oyster Growers CC	Oysters/ Mussels	SB & BB	0013
Xesibe Aquaculture Project (Pty) Ltd	Mussels	OBN	1046

3 ECO AUDITS

3.1 APPROACH AND METHODOLOGY

Monthly ECO audits comprise monthly site inspections using the approved checklist and audit standard; rotational compliance audits on individual farms using monthly Farm Monitoring Reports and supporting documentation; and ongoing regular audits of compliance of the ADZ administration as a whole. The monthly ECO audit cycle involves communication with Operators and the AMC as required as well as developing and distributing the following documents:

- Detailed monthly ADZ compliance reports issued to the AMC and Compliance Monitoring Directorate at DFFE.
- ECO site inspection report issued to the AMC.
- Summary report (this report) submitted to the CF, AMC, and Operators.

3.2 PROGRESS WITH PARTIAL OR NON-COMPLIANCES

The partial compliances in the Saldanha Bay ADZ project can be resolved with the following mitigation measures stipulated below:

- It is the mandate of TNPA to accurately demarcate with South African Maritime Safety Authority (SAMSA) approved marker buoys (EMPr table 5-1, condition 2). The DFFE has no control over this. To identify the required marker buoys for the ADZ, an Aids to Navigation (AtoN) Plan was developed (final draft submitted on 27 November 2022). The workshop for stakeholder engagement on this Risk Assessment was held on the 11 - 12 October 2023. A Navigational Risk Assessment was conducted for Saldanha Bay, therefore, AtoN plan needs to be implemented in order to be rated compliant. Meetings were held on 7 of December 2023, 8 March 2024 and 19 August 2024, to discuss this matter. Discussion was also held with SAMSA on 21 August 2024 regarding the matter. However, discussions remain ongoing between the DFFE and TNPA to resolve the outstanding issues.
- Operators must remain compliant with maintenance and operational guidelines (EMPr table 5-1, condition 6). See details regarding farm maintenance plans in Anchor Report 2014/30_1b (ECO site inspection report).
- The AMC should ensure that the shoreline of the Bay is monitored for aquaculture equipment washed ashore (EMPr table 7-1, condition 2). There has been a notable improvement in the reporting of beach clean-up data in 2024, with data provided to the ECO for all three precincts (Big Bay, Small Bay and Outer Bay) each month since January 2024 (discussed in detail in Anchor Report 2014/30_1b). However, due to severe weather and logistic issues only Big Bay and Small Bay was cleaned during the reporting period. The ECO received beach clean-up data for September 2024 for clean ups in Big Bay (Mykonos, Leentjies Klip, Blouwaterbaai and next to Beach Road), and Small Bay (the whole Northern Beach). No floats were retrieved from the Small Bay beach, with a small fraction of the waste collected comprising aquaculture waste such as rope offcuts. A total of 48 floats were collected from the Big Bay beach. Beach clean ups by operators

of Outer Bay North must resume. Beach clean ups by operators of Outer Bay North must resume.

- Farm owners must ensure repairs of broken infrastructure are done and regular maintenance of their farms as a matter of utmost priority to ensure compliance with the operational guidelines outlined in the EA and the Environmental Management Programme (EMPr).

3.3 ACTIVITIES IN THE ADZ — AUGUST 2024

3.3.1 FARM INSPECTIONS

On the 17 September 2024, the ECO team conducted on-water inspections of three farms in Small Bay (Blue Sapphire Pearl, Saldanha Bay Oyster Company and West Coast Aquaculture). A summary update of the general condition of the farms observed during July 2024 Audit:

- Lines were straight and taught with each line being numbered.
- There was minimal biofouling on infrastructure.
- Unique identifying markers was not always present on the line markers, which makes the identification of farm infrastructure challenging.
- All farms were compliant with the authorised numbers of lines/rafts in the water.

3.3.2 PEPPER BAY JETTY

A preliminary biowaste site inspection was conducted on the 24 April 2024 with the DFFE compliance officer, Bongumenzi Gumbi. It appears that only some farms are using the government jetty for wash-down activities, while all other farms were using their own facilities and discharging separately (some farms for example appear to be sending washdown water to stormwater systems, which may include biofouling). The ECO team send a list of the farms to Bongumenzi Gumbi for them to follow up about their waste management; The EA and EMPr only covers sea-based activities and does not address activities occurring on land. As such the cleaning of biofouling off site does not fall under the scope of the EA and EMPr. However, as a proactive measurement the AMC is attempting to address this type of land-based challenges. It must be ascertained if these farms are operating under a General Discharge Authorization (GDA) /Coastal Waters Discharge Permit (CWDP). Internal discussions within the Department are ongoing.

3.3.3 DECOMMISSIONING

Decommissioning progress for Southern Atlantic Sea Farms (SASF) 1 and 2, Southern Cross Salmon Farm (SCSF), and plans for K13 and K25 was provided by Ocean Grown Aquaculture (OGA) Farm Manager Mauritz Viljoen on 20 June 2024.

As of 20 June 2024, eight lines had been relocated from Southern Atlantic Sea Farms 1 in Big Bay to West Coast Oyster Growers (Big Bay). West Coast Oyster Growers Big Bay is licenced for 14 lines; as of June 2024, this site has reached total allowable capacity.

Three lines were moved to West Coast Oyster Growers IB (Small Bay) in April 2024 from SASF 1 (OBN), and six lines were moved from Southern Cross Salmon Farm (OBN) to WCOG

(SB) in May 2024. This site is authorised for 21 mussel long lines and 20 oyster baskets on long lines (41 lines total). The June 2024 site visit confirmed 6 production mussel long lines, two dormant (in water) mussel long lines, and 20 oyster baskets on long lines observed. Therefore, there is capacity for an additional 13 mussel lines and 0 oyster lines to be installed at this farm (including the two dormant lines).

Saldanha Bay Oyster Company (Big Bay) is authorised for 28 mussel long lines. As of June 2024, no lines have been transferred to this farm. Movement of line to Saldanha Bay Oyster Company (BB) was planned to happen in July 2024 however there was a delay, and the line have not been moved yet. The 28 mussel long lines will be made up from material sourced from K13, K25, SASF, SASF 2 (Atlantic) and SCSF. Due to the mooring block weight constrains in Big Bay, two lines from the farms mentioned previously will be required to create a single line SBOC. A detailed summary of how the material sourced from K13, K25, SASF, SASF 2 (Atlantic) and SCSF will be utilized to create the 28 lines in SBOC is given in a correspondence letter to the AMC and project management team.

3.4 SUMMARY OF COMPLIANCE WITH THE EA AND EMPr

In September 2024, 24 conditions of a possible 27 were auditable, which has been the case since June 2023 (Table 3.1). During the September 2024 audit period, the ADZ had a reduced overall compliance score of 87.5%. Partial compliance increased to at 12.5% and non-compliance at remained at 0% (Table 3.1, Figure 3.1).

Table 3.1. Compliance for June 2023 – September 2024.

Audit Date	Total Applicable Conditions	Compliance Percentage	Compliant	Partially Compliant	Non-compliant	Not Applicable
2023/06/15	24	83	20	4	0	3
2023/07/20	24	83	20	3	1	3
2023/08/08	24	83	20	3	1	3
2023/09/06	24	83	20	3	1	3
2023/10/13	24	83	20	4	0	3
2023/11/14	24	83	20	4	0	3
2023/12/06	24	83	20	4	0	3
2024/01/19	24	83	20	4	0	3
2024/02/02	24	92	22	2	0	3
2024/03/15	24	92	22	2	0	3
2024/04/18	24	92	22	2	0	3
2024/05/23	24	92	22	2	0	3
2024/06/24	24	92	22	2	0	3
2024/07/25	24	92	22	2	0	3
2024/08/23	24	92	22	2	0	3
2024/09/17	24	87.5	21	3	0	3

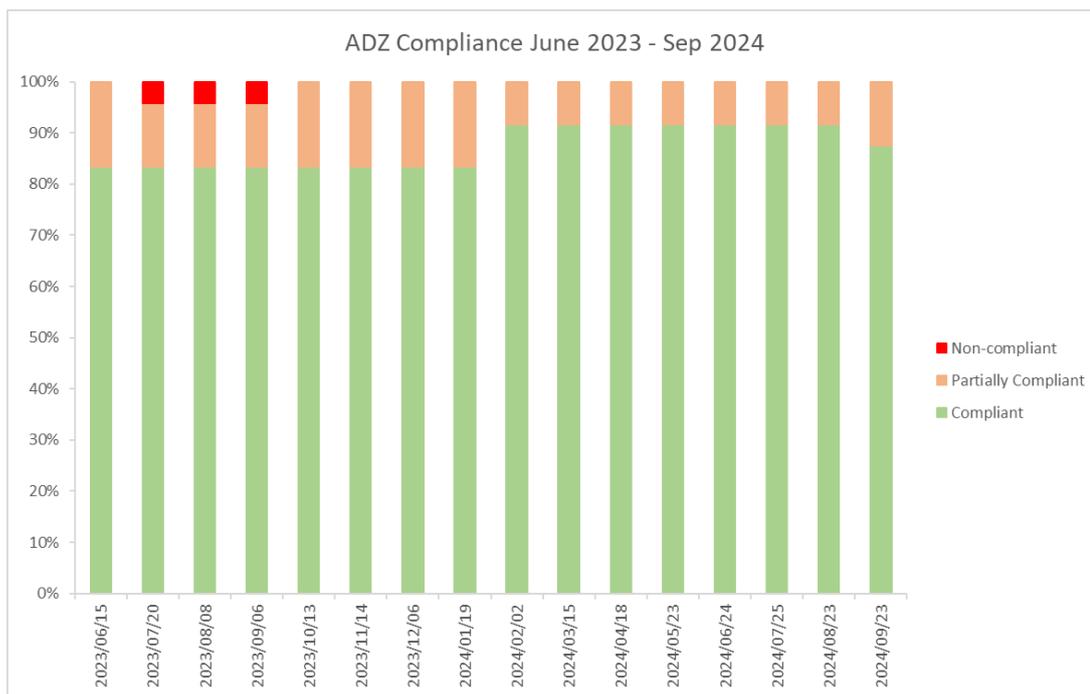


Figure 3.1. ADZ compliance for year 2/3 of ECO audits conducted by Anchor (June 2023 to September 2024).

3.5 FARM MAINTENANCE PLAN FEEDBACK

3.5.1 REQUA ENTERPRISES

Non-compliances with the infrastructure and operational guidelines were observed on Requa Enterprises Outer Bay North farm during the May 2023 site inspection. A meeting was held on the 26 January 2024 mainly to discuss challenges faced with line retrieval on their farm. At the time of drafting, Requa has been unable to locate their infrastructure in the water, as it appears to be either sunken or removed. Financial constraints have led Requa to cancel the lease agreement with Transnet National Ports Authority (TNPA). The matter has been referred to the ADZ project management team, who held an internal meeting regarding the way forward.

3.5.2 PLUTO MUSSELS AND TRADING

At the time of drafting, the progress of the maintenance requested from Pluto Mussels and Trading as per the non-compliance letter was not adhered to and there has been no substantial feedback to date. A decommissioning plan was requested by 15 April 2024; however, no plan has been received despite numerous follow up attempts. The Pluto owner requested a meeting with DFFE and the Department of Agriculture and the possible entities that could assist him with his farm — however, despite repeated follow ups, Pluto suggested a meeting for 19 August 2024 which never realized as no arrangements were made.

3.5.3 MMM AGRI CONSULT

MMM Agri Consult's farm owner notified the ECO team and AMC representatives of the termination of their service agreement with Ocean Grown Aquaculture the 16 October 2023. The farm was issued a final Coastal Protection Notice (in terms of 59(1) of the National Environmental Management Integrated Coastal Management Act, 2008) by the DFFE on the 31 August 2023. Communication on 18 May 2024 was that they were still investigating what happened to the other lines, whether they are sunken or detached. There is no evidence to suggest the lines were stolen. A diver was sent, but nothing was recovered. An investigation of beach recoveries has also yielded no results. This farm was required to submit decommissioning plan by 15 April 2024. However, they expressed interest to not decommission the farm, and they applied for an amendment to their Marine Right and a request for a permit renewal. However, the application was rejected by the DFFE due to lease issues with TNPA. As such, MMM Agri Consult Farm currently does not have a valid permit for operations. The matter has been referred to the ADZ project management team.

3.5.4 XESIBE AQUACULTURE PROJECT

Xesibe Aquaculture's permit expired on the 02 February 2023, and this farm is no longer under Ocean Grown Aquaculture. Xesibe no longer has a valid aquaculture permit, and a decommissioning plan was requested with a deadline of 15 April 2024. Xesibe Aquaculture have since stopped responding to all ECO communications, and the matter has been referred to the ADZ project management team., Farm Monitoring Reports (FMRs)

Farm Monitoring Reports (FMRs) are completed and submitted by all operators prior to the 15th of the following month along with verification documentation (such as invoices or other means of tracking production). Each farm must submit a separate FMR for each farmed product and precinct in which they farm. As of 20 September 2024, 15 out of 25 FMRs were submitted on time, with six submitted late and four still pending at the time of drafting (see Table 3.2). All farms with sales included supporting documents, while 10 farms reported no sales (Table 3.2). This indicates that roughly 50% of the 22 farms that submitted FMRs reported no sales.

Table 3.2. FMR Submission status, supporting production verification documents and visual inspection logs. Late submissions, lack of supporting documents or non-provision of visual logs is highlighted in red.

Farm name	Location	Species	Date	Supporting docs	Visual Inspection Log	Notes
African Olive Trading	Inner Bay	Mussels	2024/09/12	yes	yes	
Aqua Foods SA	Inner Bay	Mussels/oysters	2024/09/10	yes	yes	
Aqua Foods SA	Big Bay	Mussels	N/A – not actively farming			
Blue Lagoon Products	Big Bay	Oysters	2024/09/17	no sales	yes	
Blue Ocean Mussels	Inner Bay	Mussels	2024/09/06	yes	yes	
Blue Sapphire Pearls	Big Bay	Mussels	2024/09/16	yes	yes	
Blue Sapphire Pearls	Small Bay	Oysters	2024/09/16	yes	yes	
CEX Enterprises	Big Bay	Mussels	N/A – not actively farming			
Imbaza Mussels	Inner Bay	Oysters	2024/09/17	yes	yes	

Farm name	Location	Species	Date	Supporting docs	Visual Inspection Log	Notes
K2019005713	Big Bay	Mussels	2024/09/13	no sales	yes	Decommissioning in process
K2019005725	Big Bay	Mussels	2024/09/13	no sales	yes	Decommissioning in process
Lagoon Aqua Farm	Big Bay	Mussels	2024/09/17	no sales	yes	
Madima General Agriculture Trading	Big Bay	Mussels	2024/09/19	no sales	yes	
Mika Growers	Big Bay	Mussels	2024/09/13	no sales	yes	
MMMagri Consult	Big Bay	Mussels	Outstanding at time of drafting			
Pluto Mussels and Trading	Big Bay	Mussels	Outstanding at time of drafting			
Requa Enterprises	North Bay	Mussels	N/A – not actively farming			
Saldanha Bay Oyster Company	Small Bay	Oysters	2024/09/13	yes	yes	
Saldanha Bay Oyster Company	Big Bay	Oysters	N/A – not actively farming			
Salmar Trading	Inner Bay	Oysters	2024/09/15	yes	yes	
Simunye Mussels	Big Bay	Mussels	2024/09/13	no sales	yes	
Southern Atlantic Sea Farms 1	North Bay	Mussels	2024/09/13	no sales	yes	Decommissioning in process
Southern Atlantic Sea Farms 2	North Bay	Mussels	2024/09/13	no sales	yes	Decommissioning in process
Southern Cross Salmon Farm	North Bay	Mussels	2024/09/13	no sales	yes	Decommissioning in process
Ulwazi Kukutya	Big Bay	Mussels	Outstanding at time of drafting			
Wada Projects	Big Bay	Mussels	N/A – not actively farming			
Well Done Works	Big Bay	Mussels	N/A – not actively farming			
West Coast Aquaculture	Inner Bay, Big Bay	Mussels/oysters	2024/09/13	yes	yes	
West Coast Oyster Growers BB	Big Bay	Mussels/oysters	2024/09/13	yes	yes	
West Coast Oyster Growers SB	Small Bay	Oysters	2024/09/13	yes	yes	
Xesibe Aquaculture Project	North Bay	Mussels	Outstanding at time of drafting			

3.6 BEACH MONITORING BY OPERATORS

In September 2022, the Bivalve Shellfish Association of South Africa (BSASA) provided names of four members of the Aquaculture Industry who have committed to monitoring and cleaning beaches (Table 3.4). The ECO provided a feedback template to the volunteer operators to

record waste volume estimates, dominant waste type and percentage of collected waste that comprises aquaculture debris. Beach clean-up feedback is provided the following month to ensure data for the entire month is captured.

Table 3.3. Members of Aquaculture Industry committed to beach monitoring and clean-up as required by EMPr conditions 1 and 2 of Table 7-1.

Responsible party	Group/affiliation	Precinct	Beach	Frequency
Wayne Maree	Aqua Foods SA	Big Bay (BB)	Spreeuwalle – Paradise beach	Twice a month
Mauritz Viljoen	Ocean Grown Aquaculture			Bi-weekly
Mauritz Viljoen	Ocean Grown Aquaculture	Outer Bay North (OBN)	West and Eastern Beach	Monthly
Vos Pienaar	Imbaza Mussels	Small Bay (SB)	Small Bay Northern beaches (Hoedjies Bay to Mossgas)	Weekly
SJ Poggenpoel	Blue Ocean Mussels (BOM)	Small Bay (SB)	Marcus Island – SB side	Monthly

Waste data is provided for beach clean-ups for Small Bay, Big Bay and Outer Bay North. Detailed feedback has not been provided on Marcus Island to date, however photographic evidence was provided in September 2022, and due to the direction of the prevailing swell and current, minimal waste is anticipated to wash up on Marcus Island.

Overall, the waste collected from Small Bay beaches primarily consists of litter and general waste, with only a small portion originating from the aquaculture industry (Figure 3.2). In Big Bay, most of the waste collected from the beaches is composed of aquaculture floats, while a smaller portion is comprised of rope offcuts that are collected in refuse bags (Figure 3.2 and Figure 3.3).

The ECO received beach clean-up data for September 2024 for clean ups in Big Bay (Mykonos, Leentjies Klip, Blouwaterbaai and next to Beach Road), and Small Bay (the whole Northern Beach). No floats were retrieved from the Small Bay beach, with a small fraction of the waste collected comprising aquaculture waste such as rope offcuts (Figure 3.2). A total of 48 floats were collected from the Big Bay beach (Figure 3.3). No data was provided for Outer Bay (Figure 3.2 and Figure 3.3).

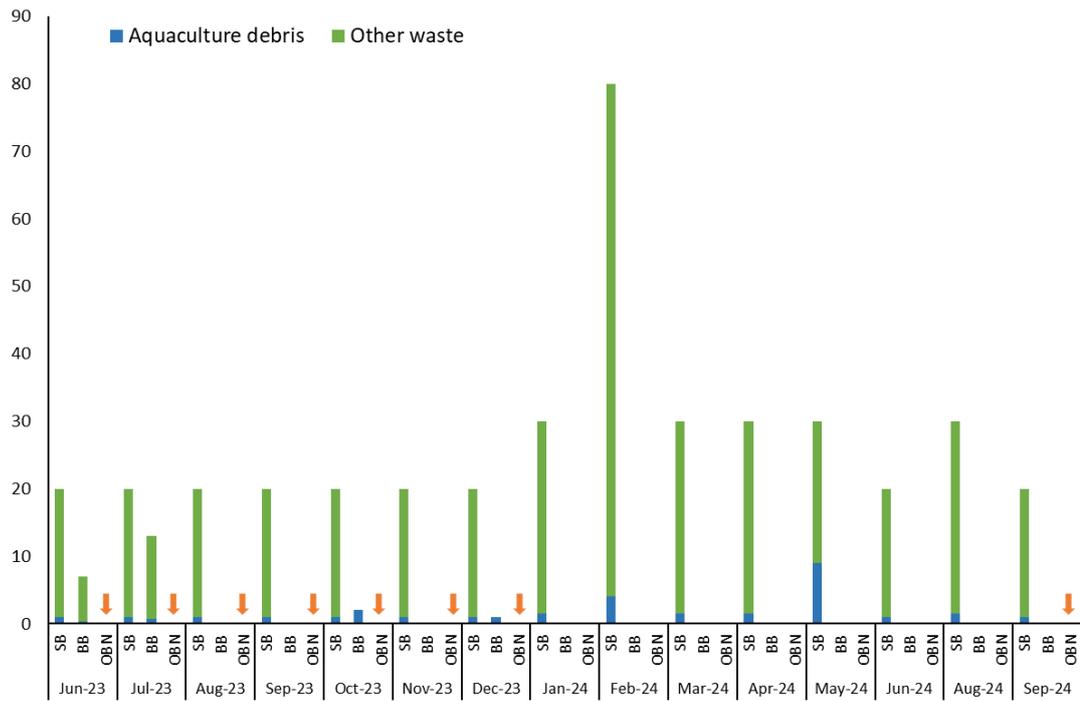


Figure 3.2. Refuse bags (containing waste) collected from beaches in the various precincts. Total waste collected and portion of waste constituting aquaculture debris is presented. The orange arrows an absence of reporting.

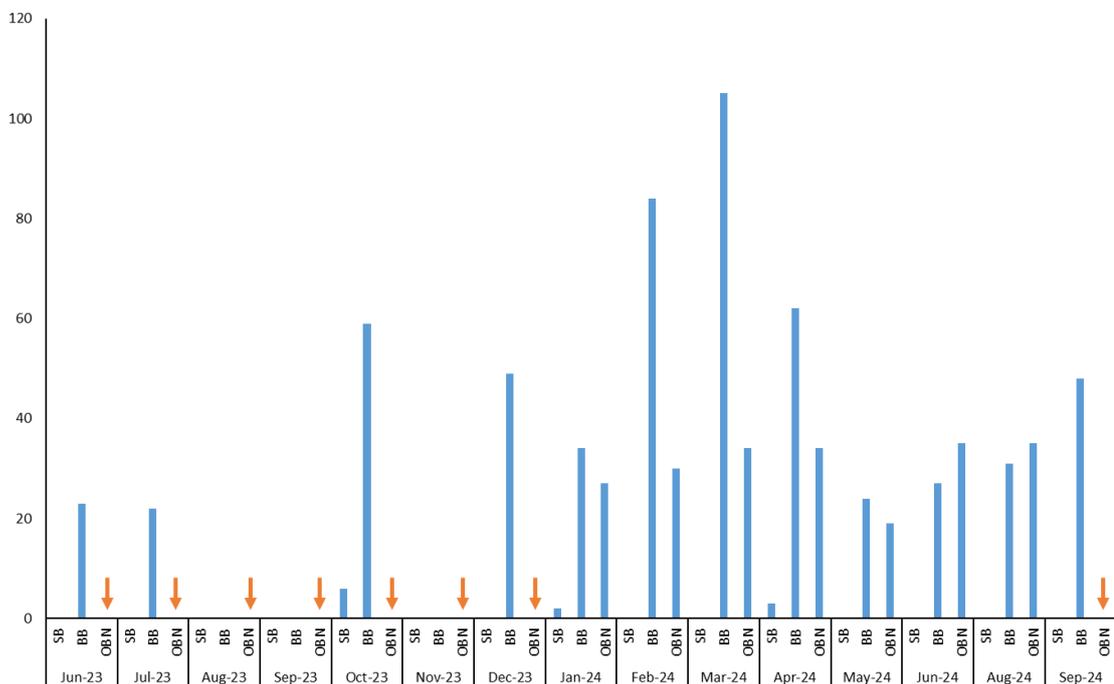


Figure 3.3. Floats collected from beaches in the various precincts. The orange arrows an absence of reporting.

3.7 BEACH INSPECTION BY ECO

The ECO conducted an opportunistic inspection of the beach in upper reaches of Small Bay (Figure 3.4). Several pieces of rope and a few buoys were found on the beach (Figure 3.5). Two buoys were observed floating close inshore (Figure 3.6). One large buoy was also seen

on the beach which likely belongs to Transnet (Figure 3.7). Operators were notified (incident IR – Sep 24-01), and the ECO requested that this aquaculture waste be cleaned from the beach as a matter of urgency.

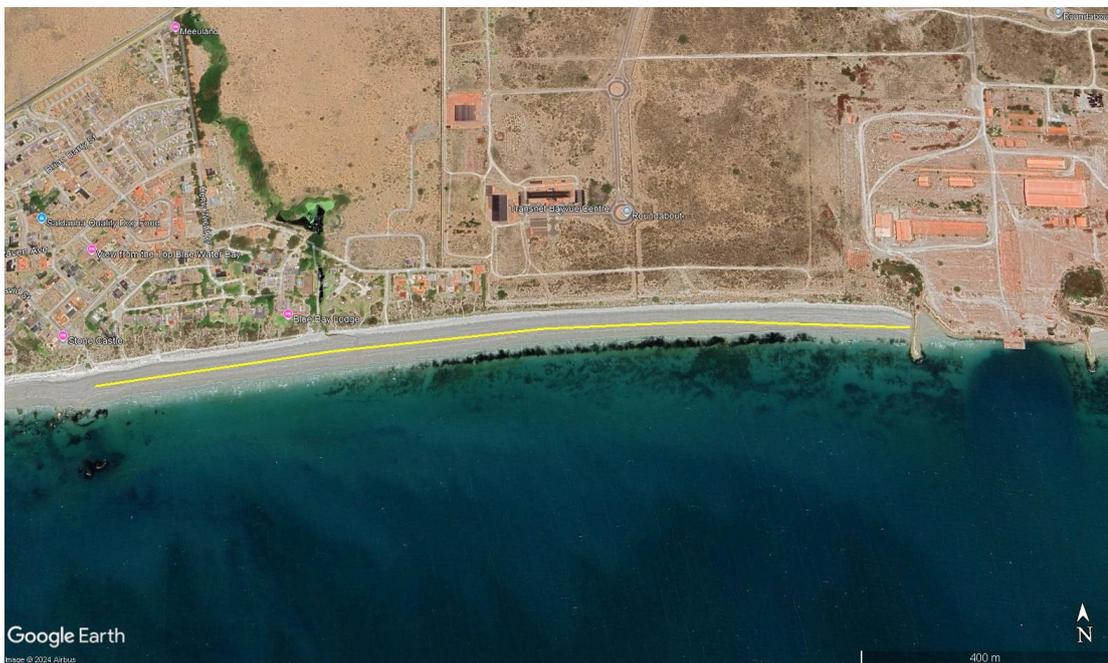


Figure 3.4. The section of small bay beach that was inspected by the ECO



Figure 3.5. Pieces of rope and buoys found on the beach at the upper reaches of Small Bay.



Figure 3.6. Two buoys floating close inshore at small bay beach



Figure 3.7. A large buoy found on small bay beach which likely belongs to Transnet

3.8 INCIDENTS

One Incident occurred during the September audit period. During a beach inspection of Small Bay, a high number of rope offcuts and several buoys were observed on the beach (IR – Sep 24-01). The ECO requested that this aquaculture waste be cleaned from the beach as a matter of urgency.

During the ECO team's August 2024 site visit, the team was informed of an incident which occurred in July 2024 which was not reported. Four of Aqua Foods SA top lines broke free from their mooring blocks, two of these lines have been restored and are operational again but the remaining two lines still require repairs. While an incident report was submitted by Aqua Foods on 14 August 2024 (IR Aug 24-01), a reminder was sent to Aqua Foods SA that

all incident must reported within seven days after the incident occurred. The ECO followed up on 23 September 2024 to determine of the remaining two lines have been reinstated but received no response.

The ECO team followed up on the status of the June 2024 incident at Blue Ocean Mussels (BOM) (raft P16 and P39 were lashed together due to overnight strong winds, see IR - June24-01). The BOM team has confirmed that the two rafts have been separated and are operating again.

4 ADZ MANAGEMENT

4.1 BAY USER SAFETY

It is the mandate of TNPA, who must ensure that the ADZ is accurately demarcated with South African Maritime Safety Authority (SAMSA) approved marker buoys (EMPr table 5-1, condition 2). (the DFFE has no control over this). To identify the required marker buoys for the ADZ, an Aids to Navigation (AtoN) Plan was developed (final draft submitted on 27 November 2022). The workshop for stakeholder engagement on the Navigational Risk Assessment required for the implementation of the AtoN plan was held on 11-12 October 2023. A Navigational Risk Assessment was conducted for Saldanha Bay, therefore, AtoN plan will be implemented in order to be rated compliant. Meetings were held on 7 of December 2023, 8 March 2024 and 19 August 2024, to discuss this matter. DFFE held discussions with SAMSA on 21 August 2024 regarding the matter, and these discussions are ongoing

4.2 BIVALVE PRODUCTION VOLUMES

Graded production volumes in the ADZ are recorded monthly. Production volumes for March 2024 and cumulative production to date supplied by the Branch: Fisheries Management using the approved formula to calculate total ungraded production are presented in Table 4.1. Production is below the current limit of 15 000 tpa ungraded shellfish (7 500 tpa graded). Per the EA, bivalve production may be increased by an additional 5 000 tons annually but only if monitoring results indicate that the environment health has been maintained and impacts remain manageable.

Table 4.1. ADZ bivalve production (tons). The Approximate ungraded production is based on the conservative assumption that the ratio of ungraded to graded shellfish volume is ~2:1.

ADZ Precinct	Graded production						
	Monthly graded production August 2024	Feb 2019-Jan 2020 (Year 1 prod)	Feb 2020-Jan 2021 (Year 2 prod)	Feb 2021-Jan 2022 (Year 3 prod)	Feb 2022-Jan 2023 (Year 4 prod)	Feb 2023-Jan 2024 (Year 5 prod)	Feb 2024-Jan 2025 (Year 6)
Small Bay	140	2847	1936	2921	2621	3299	1444
Big Bay	42	189	240	480	700	260	65
Outer North Bay	0	433	297	330	175	0	0
Outer South Bay	-	-	-	-	-	-	-
Total graded	182	3 468	2473	3731	3496	3558	1503
Approximate ungraded production	338	6 497	4 707	7 228	6664	6633	2796

4.3 ENVIRONMENTAL MONITORING

None to report.

5 RECOMMENDATIONS

5.1 GENERAL RECOMMENDATIONS

The following recommendations are made by the ECO for the consideration of Branch Fisheries Management.

NatGro was previously accepting organic waste from the aquaculture industry for composting but have recently restricted acceptable waste due to odour complaints. Therefore, limiting industry's legal options for safe waste disposal. It is recommended that ADZ operators engage with NatGro Organics to identify their specific concerns for composting aquaculture biological waste and attempt to find a solution to these concerns. This matter was discussed in the operators meeting that was held on the 18 October 2023, unfortunately there was no resolution.

Navigational Risk Assessment is concluded, the AtoN Plan has been finalised, and TNPA is the mandated authority and should ensure implementation and execution of this plan. Further discussions between DFFE, SAMSA and TNPA are required to resolve the outstanding markers. Follow up discussion meetings were held on the 7 December 2023, 8 March 2024, 19 August 2024 and 21 August 2024, and discussions remains ongoing.

- Monitoring progress with the maintenance plans should continue.
- While the main receiving beaches should continue to be included in ECO site inspections, opportunistic inspection of other beaches that may not receive as much attention (such as the Marucs Island Causeway shoreline on the Small Bay side) should also be monitored opportunistically.

A reef survey was conducted during this reporting period, but the report was not received by the time of drafting this report. However, the report has not been received yet and as such no conclusions can be drawn from the survey at this time.

The following recommendations are made by the ECO for the consideration of Operators:

- Frequent cleaning of biofouling from lines and infrastructure should occur to reduce the risk of lines chaffing and breaking.
- Beach monitoring and removal of aquaculture debris should occur twice a month (minimally) to ensure that beaches are free of aquaculture debris.
- Monitoring and gathering data on Endangered, Threatened, and Protected (ETP) species should be considered a priority as it is a requirement for Marine Stewardship Council (MSC) accreditation which will aid in accessing European markets.
- Currently only a single operator still uses the Pepper Jetty for wash down operations. The Operator must engage with DFFE: Compliance to assist in determining a solution to the accumulation of sediment due to wash down activities on Pepper Bay Jetty.
- Framers should take note that a “dormant line” means a *line is a line that is installed in the water (and comprises mooring blocks, risers and top line) that it takes up physical space within the ADZ precinct but has no ongoing production.*
- Beach clean ups by operators of Outer Bay North must resume.

- Operators must notify the ECO two weeks prior to any changes are made to infrastructure

5.2 EVALUATION OF EMPr

In the opinion of the ECO, no changes should be made to the EMPr to ensure continued avoidance, management, and mitigation of environmental impacts. Furthermore, the ECO does not recommend changes to the EMPr to ensure compliance with the EA.

6 CONSULTATIONS AND COMMUNICATIONS

6.1 CONSULTATIONS

1. Copies of comments received:
 - Communications register September 2024.
 - Documents register September 2024.
2. Information requested by the competent authority:
 - None.
3. Interviews, discussions, and other communications.
 - None

6.2 COMMUNICATIONS

Communications received by the ADZ ECO during the September 2024 audit period are presented in Table 6.1 below.

Table 6.1. Individual, organization, and purpose of important consultations during the September 2024 audit period.

Individual	Organisation	Subject
Alexis Osborne	DFFE Project team	SAWDN Whale disentanglement Training for Skippers/Bosuns
André de Villiers	Saldanha ADZ ECO	Introduction of New ECO
André de Villiers	Saldanha ADZ ECO	Combined Lines
André de Villiers	Saldanha ADZ ECO	Marcus Island Beach Monitoring
André de Villiers	Saldanha ADZ ECO	SBOC line installations
Ferdie Endemann	Western Cape Government	AMC request for Meeting from WC :DoA ACPAC, 30 September 2024
André de Villiers	Saldanha ADZ ECO	Mika FMR
André de Villiers	Saldanha ADZ ECO	Access to Marcus Island Beach



forestry, fisheries
& the environment

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



ANCHOR
environmental