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

SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE (ADZ)

ENVIRONMENTAL CONTROL OFFICER (ECO)

MONTHLY SUMMARY REPORT 9



December 2022



SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE (ADZ) ENVIRONMENTAL CONTROL OFFICER (ECO) MONTHLY SUMMARY REPORT 9

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Report prepared for:

Department of Forestry, Fisheries and the Environment
Branch: Fisheries Management



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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
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
FSO	Food Safety Office
IR	Incident Report
LST	Lipophilic Shellfish Toxin
MLRF	Marine Living Resources Fund
NC	Non-compliant
OBN	Outer Bay North
OBS	Outer Bay South
PC	Partial Compliance
SAMSA	South African Maritime Safety Authority
SASH	South Atlantic Seafoods Holdings (Pty) Ltd
SB	Small Bay
SBIDZ	Saldanha Bay Industrial Development Zone
SBM	Saldanha Bay Municipality
SBOC	Saldanha Bay Oyster Company
SBWQFT	Saldanha Bay Water Quality Forum Trust
TNPA	Transnet Ports Authority

PROJECT TEAM

Details of the Environmental Control Officer

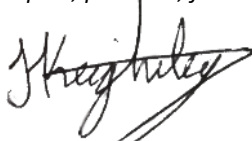
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Details of the Independence in terms of Chapter 5 of the National Environmental Management Act of 1998)

Box 1: Declaration of Independence of Environmental Control Officer

I, Jenna May Keightley 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.



06 January 2023

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.



06 January 2023

Compliance with Appendix 7, General Notice (GN.) 1224 of 2020

In terms of the requirements of the amended 2014 Environmental Impact Assessment (EIA) Regulations (13 November 2020) and the recommendations for environmental audits under Regulation 25 (Table 1), the following should be noted:

- Anchor follows the prescribed format for audit reports listed in Appendix 7 of GN. 1224 of 2020.
- 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 25 of GN. 1224 of 2020 (such as seeking amendment to the EMPr or associated licences/permits). Ensuring compliance is the obligation of the proponent.

Table 1. Legal requirements for Audit Reports per Appendix 7, GN. 1224 of 2020.

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 and Section 2
Methodology adopted in preparing the environmental audit report.	Section 6
Evaluation of the ability of the EMPr to sufficiently: <ol style="list-style-type: none"> 1. provide for continued avoidance, management and mitigation of environmental impacts and at closure. 2. Ensure compliance with EA, EMPr and if applicable, closure plan. 	Section 7
Description of any assumptions, uncertainties or gaps in knowledge.	Section 2.4

1 PURPOSE OF THIS REPORT

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 only and summarised monthly audits of the ADZ and individual farms. 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.

2 INTRODUCTION AND BACKGROUND

Mussel farming has occurred in Saldanha Bay since 1981 and was subsequently followed by oyster farming in the early 2000s. In order to conduct aquaculture activities, potential aquaculture farmers must conduct an Environmental Impact Assessment (EIA) and obtain an Environmental Authorisation (EA) from the Department of Forestry, Fisheries and the Environment (DFFE). As this process can be arduous and costly it presents a barrier to entry to the aquaculture industry. To facilitate investment and development of additional aquaculture in the Bay, the then Department of Agriculture, Forestry and Fisheries (DAFF)¹ proposed the establishment of a sea-based Aquaculture Development Zone (ADZ) in Saldanha Bay.

The Branch Fisheries Management (formally DAFF now DFFE) 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) 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.

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

¹ Following a Ministry reshuffle in mid-2019, Fisheries and Forestry has merged with The Branch Environment under the Ministry of Forestry, Fisheries, and the Environment (DFFE).

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/AM1 and 14/12/16/3/3/1/1728/AM2, respectively). The original approved EMPr is dated August 2017 and has been amended three times in May 2020, June 2021, and June 2022.

The Marine Living Resources Fund (MLRF)² under the auspices of DFFE: Fisheries Management has appointed Anchor Research & Monitoring (Pty) Ltd (Anchor)³ as ADZ 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.

Table 2. 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 March 2025

2.1 Site 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.

² Schedule 3A Public Entity established in terms of the Public Finance Management Act, 1999 (Act No 1 Of 1999).

³ Part of the Anchor group of companies.

2.2 Project Description

The Saldanha Bay ADZ comprises 4 precincts, namely Small Bay (SB), Big Bay (BB), Outer Bay North (OBN), and Outer Bay South (OBS) (Figure 1). The BA Report summarised the scope for expansion in the ADZ and comprised a mix of finfish and bivalve farms (Table 3). Details of each existing lease are depicted in Figure 2 and Figure 3. Note that there are two lease areas in OBN that are unallocated and have been advertised for lease applications by Transnet Ports Authority (TNPA).

Table 3. ADZ precincts in Saldanha Bay and area suitable for cultivation.

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

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.

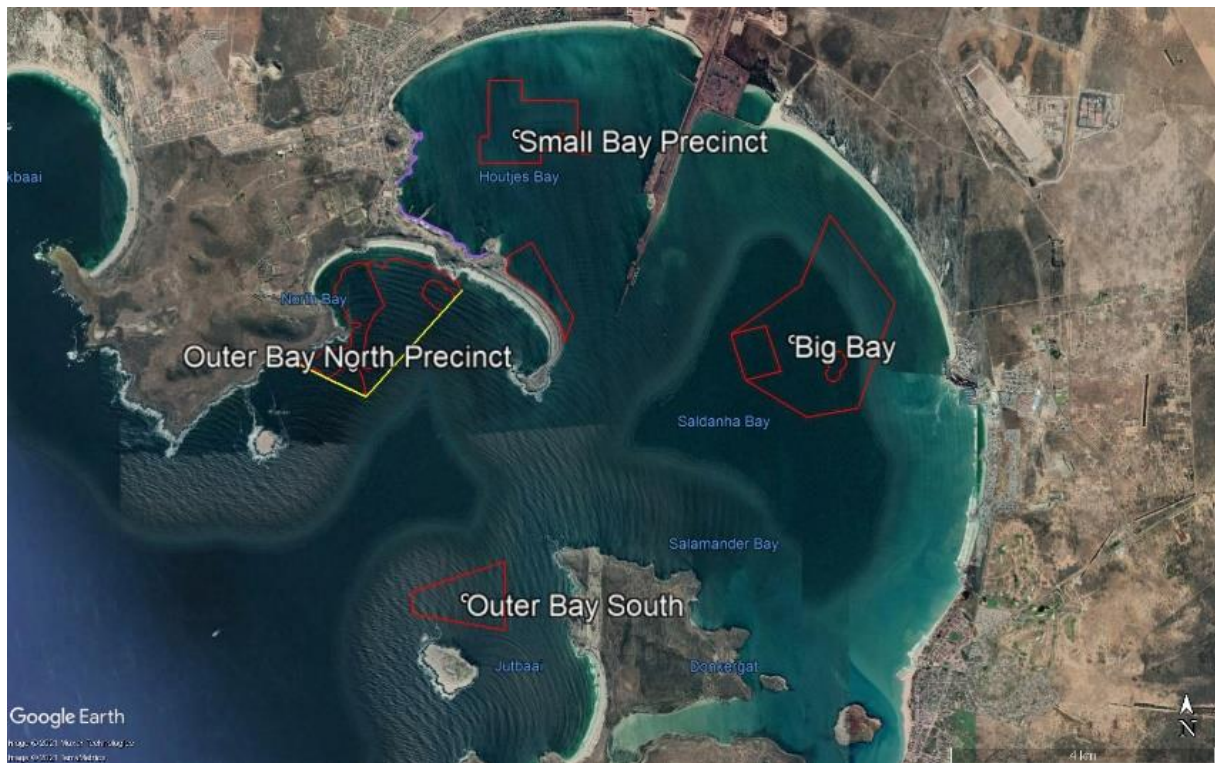


Figure 1. Saldanha Bay ADZ precincts.



Figure 2. (Left) Bivalve culture in SB and (right) mixed bivalve and finfish culture in BB.

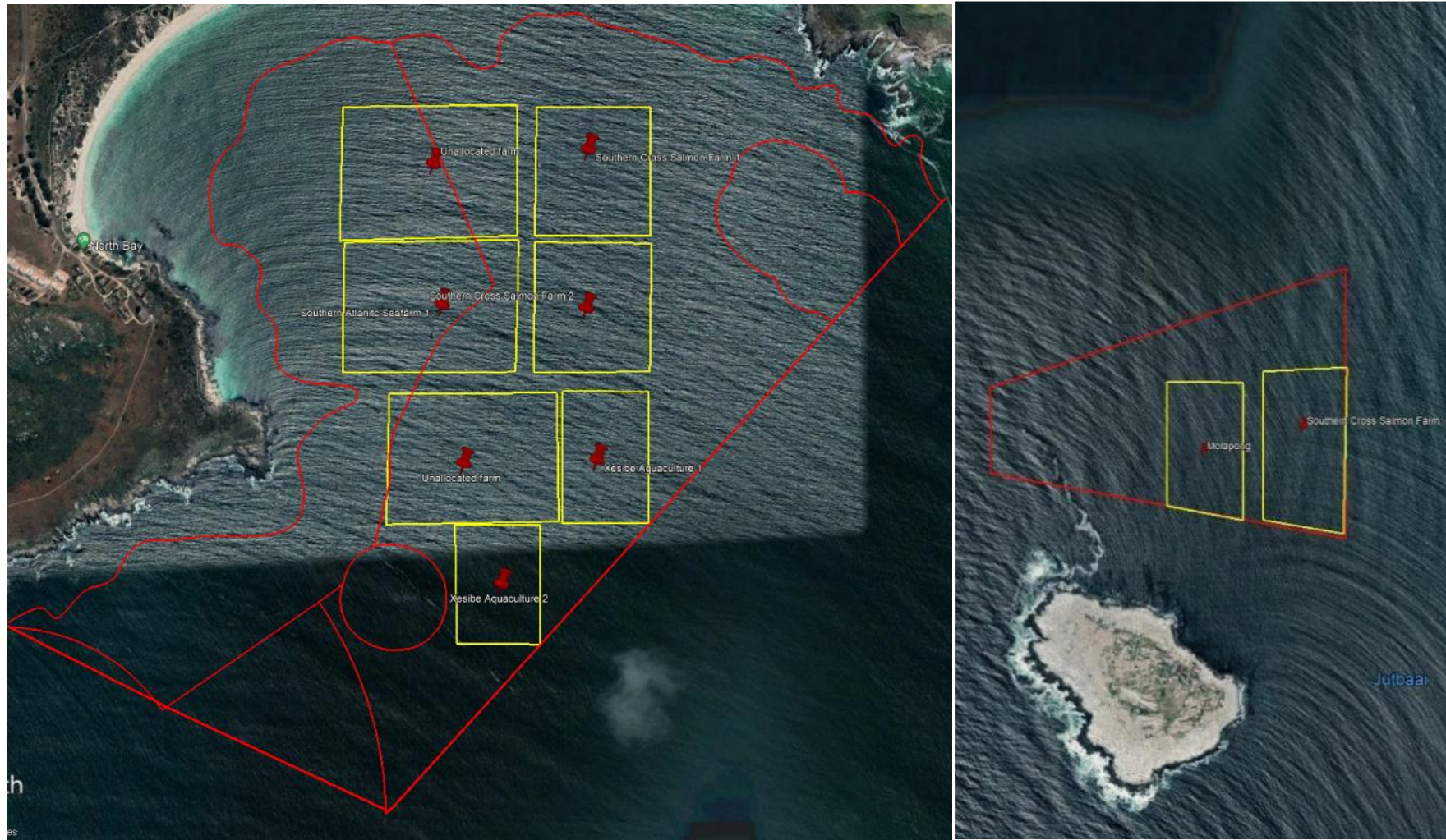


Figure 3. (Left) Bivalve culture in OBN and (right) finfish culture in Outer Bay South.

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 December 2022 is presented in Table 4.

Table 4. Operators in the Saldanha Bay ADZ.

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

2.4 Limitations and Assumptions of the Audit

The audit findings are based on information relayed in documentation, during interviews as well as the 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 about 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 EMP, EA, Permit or any condition imposed by the environmental approvals shall become the responsibility of DFFE. The following Branches and Directorates of DFFE are considered responsible for compliance for this project including DFFE: Chief Directorate Aquaculture and Economic Development, DFFE: Regulatory Compliance and Sector Monitoring under Chief Directorate Sector Compliance, and Chief Directorate Sector Enforcement.

3 INCIDENTS DURING THE LAST MONTH

One incident was reported in the December 2022 audit period. Floats were reported to have washed ashore at Blue Bay lodge in Small Bay (IR-Dec 22-01). The ECO notified the Operators of the incident and operators collected floats from the beach near Blue Bay Lodge.

4 COMMUNICATIONS RECEIVED DURING THE LAST MONTH

Communications received by the ADZ ECO during the December 2022 audit period included:

- Beach clean-up or waste data for Small Bay
- Beach clean-up or waste data for Big Bay
- Test results for National Residue Control Programme - DFFE: FSO only received 70% of the test results for 2022.
- Communications with DFFE: Pollution Control sector relating to Lead pollution observed in Saldanha Bay.
- Distribution of AMC letters to individual operators regarding increase in infrastructure requests and updated operational guidelines.

5 SIGNIFICANT DEVELOPMENTS IN THE ADZ IN THE LAST MONTH

5.1 Environmental Monitoring

Specialist Environmental Monitoring Quarterly report number 5 was produced during the month of November 2022 and was distributed to relevant parties on 1 December 2022 and is available on the EDMS system. The report discussed the retrieval, maintenance and redeployment of oxygen probes and nitrate sensors as conducted for this quarter. Proposed servicing schedule and servicing methodologies were outlined in the monitoring report.

5.2 Monthly ECO audits

This report details ADZ-level compliance on operational phases and the monitoring measures as per Table 5-1 and Table 7-2 of the ADZ EMPr. The ADZ scored an overall compliance of 87% for the audit period of December 2022 indicating **no change** in compliance percentage since the previous audit in November 2022 (Table 5, Figure 4). Although no change in compliance was observed there was progress towards improving the status of three partial compliances. The ADZ has maintained a high level of compliance (>80%) with the audit standard for 2022 and the Operators and Management team should be commended.

It is noted that DFFE: Shellfish Monitoring and Control Programme (SMCP) issued a notice of non-compliance to Operators relating to condition 106 of ADZ EMPr Table 5-2 which stipulates that Operators must *“Comply with all management programmes required by DFFE Branch Fisheries Management (e.g. health management programme) including the reporting requirements of these programmes.”* On 29 November 2022, DFFE: SMCP issued a notice to Operators to cease harvesting in BB and OBN precincts, due to non-compliance with management programmes and reporting requirements.

Table 5. Compliance over time, 2022.

Audit Date	Total applicable Conditions	Compliant	Partially Compliant	Non-compliant	Not applicable	To be confirmed
26/1/2022	23	22	1	0	3	0
24/2/2021	23	22	1	0	3	0
23/3/2022	23	20	3	0	3	0
20/04/2022	23	20	3	0	4	0
31/05/2022	25	22	3	0	2	0
01/06/2022	24	21	2	1	3	0
06/07/2022	24	20	4	0	3	0
15/08/2022	24	20	4	0	3	0
14/09/2022	23	19	4	0	4	0
19/10/2022	23	20	3	0	4	0
08/11/2022	23	20	3	0	3	1
07/12/2022	23	20	3	0	4	0

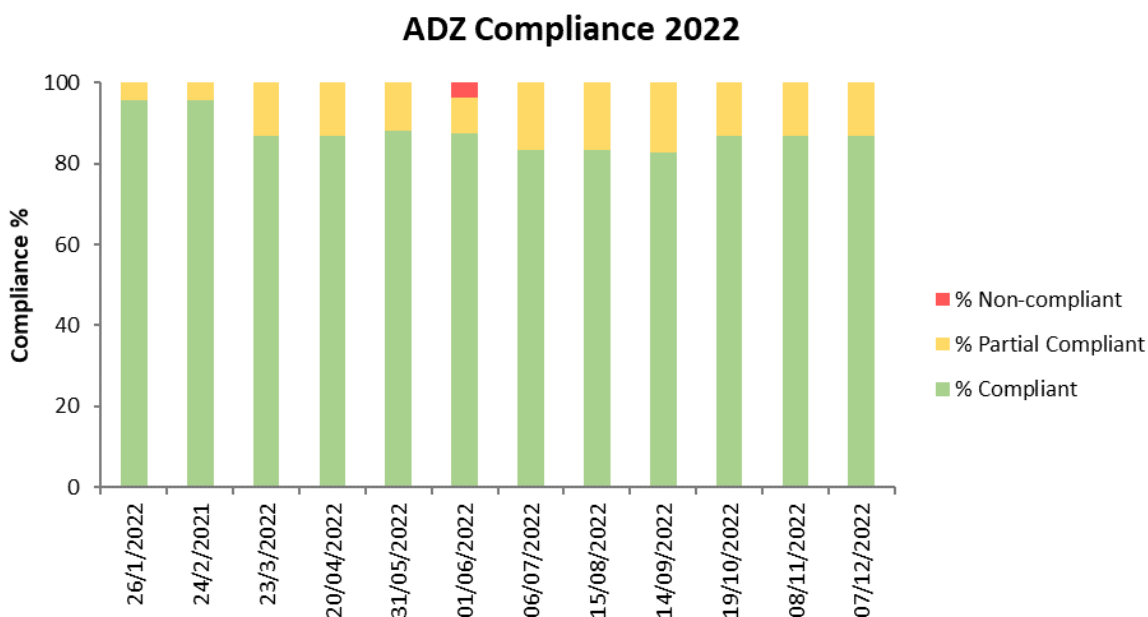


Figure 4. Compliance percentage for ADZ management over time, 2022.

5.2.1 Progress with Partial or Non-Compliances

Although the ADZ is accurately demarcated on charts it is not accurately marked *in situ* using markers compliant with the South African Marine Safety Authority (SAMSA) (EMPr table 5-1, condition 2). The DFFE Branch: Fisheries Management is engaged in discussions with SAMSA to produce an Aids to Navigation (AtoN) Plan for the Saldanha Bay ADZ. The third version of the draft AtoN plan (drafted by SAMSA) was provided to the AMC on 18 November 2022 and discussed during the 29th AMC meeting (24 November 2022). It is anticipated that the Risk Assessment process will be undertaken in 2023. This condition is considered partially compliant as progress is being made on the ADZ AtoN plan and ultimately towards installation of the required markers by TNPA.

Due to previously observed non-compliances with the infrastructure guidelines discovered during the July 2022 audit period, the ADZ ECO requested farm maintenance plans from Blue Ocean Mussels (BOM) and Saldanha Bay Oyster Company (SBOC) on 8 July 2022 (EMPr table 5-2, condition 6). These maintenance plans were provided on 20 July 2022 and were reviewed by the ADZ ECO and AMC. Comments from this review were incorporated into the maintenance plans, and these plans were implemented from August 2022. Maintenance progress has been observed at both BOM and SBOC farms through the December 2022 audit period. Detailed feedback on the progress with maintenance plans is given in section 3.2 of the ECO site inspection report (Specialist Report no. 2014/9_3b).

Progress was made to improve the partial compliance relating to monitoring the shoreline for aquaculture debris (EMPr Table 7-1, condition 2). On 8 September 2022 BSASA put forward the three Aquaculture industry individuals who committed to monitoring beaches in the Small Bay, Big Bay, and Outer Bay North precincts. Evidence of beach monitoring of Big Bay was provided for September – November 2022 (making the monitoring of Big Bay now compliant since on 8 September 2022). Evidence of beach monitoring of Small Bay for November 2022 was provided on 16 December 2022.

Evidence of beach monitoring for Outer Bay North is still outstanding and should be provided for September-November 2022 as soon as possible.

5.3 Bay user safety

An audit was conducted by SAMSA of navigational aids associated with the ADZ in December 2020. The third draft of the SAMSA Aids to Navigation (AtoN) plan was distributed to the AMC on 18 November 2022 and discussed at the 29th AMC meeting (held 24 November 2022). The draft AtoN plan discusses the existing navigational markers in the ADZ and provides recommendations for installation of additional navigational markers. The recommendations are in accordance with SAMSA regulations and ADZ EA stipulations, to ensure that the outer limits of the ADZ are clear to all Bay users. SAMSA has recommended that a navigation risk assessment be conducted before the installation of ADZ specific marker buoys; it is anticipated that the Risk Assessment process will be undertaken in 2023. Once the AtoN Plan has been finalized the responsible parties should ensure that suitable markers are installed around the ADZ, per the AtoN plan.

5.4 External Audit

None to report at this time. The next external audit is scheduled for February 2023. The independent auditor has been appointed.

6 ECO AUDIT 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; 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 Operators and the AMC.
- Summary report (this report) submitted to the CF, AMC, and Operators.

7 ECO AUDIT RESULTS

This evaluation is based on engagements between the ECO and the Branch Fisheries Management officials regarding management measures and implementation thereof.

The DFFE: Food Safety Office (FSO) notified Operators on 15 December 2022 that test results for the Bivalve National Residue Control Programme (NRCP) were outstanding for approximately 70% of the Aquaculture farms in Saldanha Bay. This constitutes a non-compliance by the Operators with EMPr

Table 5-2, conditions 24 and 106. It should be noted that no action or remediation of this non-compliance is required by the Branch Fisheries Management. The DFFE: FSO further advised Operators that should these biotoxin test results not be provided by the end of 2022 further steps will need to be taken in terms of placing product on the market, which will include closing various clusters of farms. Operators should ensure compliance with the NRCP to avoid further action being taken and to resume compliance with the EMPr.

7.1 ADZ Management

Operators within the ADZ were informed on 18 August 2022 of the Aquaculture Management Committee's (AMC) decision to increase the current limit on annual ungraded shellfish production threshold (AMC 2022). The bivalve production threshold for the entire ADZ was increased from 10 000 tons per annum (tpa) to 12 500 tpa in line with condition 49 of the EA (DEA 2018) and Table 3-1, condition 4 of the amended EMPr (EMPr 2022). Due to the increase in bivalve production threshold, all operators were invited to submit written requests to install additional infrastructure (e.g., longlines or rafts, etc.), to the AMC by 9 September 2022 (AMC 2022). Operators were advised to await written approval from the AMC before proceeding to install any additional infrastructure. Operators were also asked to estimate and submit monthly production for an annual cycle, assuming their increase in infrastructure was granted (AMC 2022). This information was received and assessed by the AMC to revise the guidelines previously issued to the operators (AMC 2019 and AMC 2021). After assessing the Operator requests, the AMC took a decision (on 24 November 2022) to increase the bivalve production threshold further, to 15 000 tpa ungraded, in order to accommodate the economic demand to sustain aquaculture businesses. Future decisions to increase production thresholds will be assessed when necessary, and these decisions will be based on the ongoing environmental monitoring and monthly production statistics submitted by operators. Due to the sensitive nature of Small Bay and the fact that it is closer to carrying capacity than the other precincts, it was decided that meetings should be held with each Small Bay farm requesting an increase. Meetings were held with individual Small Bay farmers on 10 October 2022 and 3 November 2022. Feedback on the operator engagements and recommended infrastructure changes was given at the 29th AMC meeting (held 24 November 2022). Letters were distributed to all Operators to inform each Operator of the decisions reached by the AMC on their request for an increase in infrastructure. These letters were distributed to Operators on 14 December 2022.

7.2 Bivalve production volumes

Graded production volumes in the ADZ are recorded monthly. Production volumes for November 2022 and cumulative production to date supplied by the Branch: Fisheries Management using the approved formula to calculate total ungraded production are presented in Table 6. Production is below the current limit of 15 000 tpa ungraded shellfish (7 500 tpa graded) (see Section 7.1 for details on the current production limit). 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. To ensure sustainable development, the Saldanha Bay Aquaculture Development Zone Management Committee (AMC) must consider the results and reports from

environmental monitoring as well scientific recommendations, which will inform the possible increase in production. Note that there was an error in the previous report (October 2022) for Year 4 graded production in Small Bay. Small Bay Graded production was reported to be 2 687 tons but, it was in fact 1 978 tons.

Table 6. 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	Monthly graded production November 2022	Graded production Feb 2019-Jan 2020 (Year 1 prod)	Graded production Feb 2020-Jan 2021 (Year 2 prod)	Graded production Feb 2021 - Jan 2022 (Year 3 prod)	Graded production Feb 2022 – Jan 2023 (Year 4)
Small Bay	235	2847	1936	2921	2212
Big Bay	164	189	240	480	700
Outer North Bay	1	433	297	330	175
Outer South Bay	-	-	-	-	-
Total graded	400	3 468	2473	3731	3087
Approximate ungraded production	754	6 497	4 707	7 228	5950

7.3 Farm Management

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. Therefore, the feedback given below reports on the number of FMRs submitted.

A high level of compliance was maintained during the December 2022 audit period for meeting the FMR submission deadline. Out of a possible 26 FMRs, 23 were submitted on time, one was submitted late, and two were outstanding at the time of drafting this report (Blue Ocean Mussels and Blue Lagoon Products). All farms with sales provided supporting documents, and late submissions were only one business day late (Table 7). Operators are to be commended for maintaining a high level of compliance. To accurately monitor and report on production values, FMRs must be submitted in a timely fashion. Submission of FMRs is a requirement of the Aquaculture Permit conditions and non-compliance with this requirement may result in action being taken by the DFFE: Aquaculture Authorizations office.

Table 7. FMR Submission status, supporting production verification documents and visual inspection logs. Late submissions, lack of supporting documents and not providing visual logs are highlighted in red

Farm name	Location	Species	Date	Supporting docs	Visual Inspection Log
African Olive Trading	Small Bay	Mussels	2022/12/09	yes	yes
Aqua Foods SA	Small Bay	Mussels/ oysters	2022/12/14	yes	yes
Aqua Foods SA	Big Bay	Mussels/ oysters	N/A – no active farming		
Blue Lagoon Products	Big Bay	Oysters	Not provided at the time of drafting this report.		
Blue Ocean Mussels	Small Bay	Mussels	2023/01/10	yes	yes
Blue Sapphire Pearls	Big Bay	Mussels	2022/12/14	yes	yes
Blue Sapphire Pearls	Small Bay	Oysters	2022/12/14	yes	yes
CEX Enterprises	Big Bay	Mussels	Not operational		
Imbaza Mussels	Small Bay	Oysters	2022/12/16	no	yes
K2019005713	Big Bay	Mussels	2022/12/14	yes	yes
K2019005725	Big Bay	Mussels	2022/12/14	yes	yes
Lagoon Aqua Farm	Big Bay	Mussels	No aquaculture permit		
Madima General Agriculture Trading	Big Bay	Mussels	2022/12/14	yes	yes
Mika Growers	Big Bay	Mussels	2022/12/14	yes	yes
Mmmagri Consult	Big Bay	Mussels	2022/12/14	yes	yes
Pluto Mussels and Trading	Big Bay	Mussels	2022/12/14	yes	yes
Requa Enterprises	North Bay	Mussels	N/A – no active farming		
Saldanha Bay Oyster Company	Small Bay	Oysters	2022/12/14	yes	yes
Saldanha Bay Oyster Company	Big Bay	Oysters	N/A – no active farming		
Salmar Trading	Small Bay	Oysters	2022/12/15	no	yes
Simunye Mussels	Big Bay	Mussels	2022/12/14	yes	yes
Southern Atlantic Sea Farms 1 (SASF1)	Outer Bay North	Mussels	2022/12/14	no sales	yes
Southern Atlantic Sea Farms 2 (SASF2)	Big Bay	Mussels	2022/12/14	no sales	yes
Southern Cross Salmon Farm	Outer Bay North	Mussels	2022/12/14	no sales	yes
Ulwazi Kukutya	Big Bay	Mussels	2022/12/14	no sales	yes
Wada Projects	Big Bay	Mussels	N/A - not operational		
Well Done Works	Big Bay	Mussels	N/A - not operational		
West Coast Aquaculture	Small Bay	Oysters	2022/12/14	no sales	yes
West Coast Oyster Growers BB	Big Bay	Mussels/ oysters	2022/12/14	yes	yes
West Coast Oyster Growers SB	Small Bay	Oysters	2022/12/14	no sales	yes
Xesibe Aquaculture	North Bay	Mussels	2022/12/14	no sales	yes

7.4 Site Inspections

On-water inspections were conducted for eight farms on 7 December 2022 ECO. The farms inspected and compliance feedback are provided in Table 8. Supporting photographic evidence is presented in Section 7.4.1 below.

Table 8. Farms inspected during the December 2022 ECO site inspection and compliance feedback.

Farm name	Location	Species	Date	Comment
Saldanha Bay Oyster Company (SBOC)	Small Bay	Oysters	2022/12/07	24 lines in the water. Lines were taught, straight and suitably marked (Figure 5).
West Coast Aquaculture (WCA)	Small Bay	Mussels/oysters	2022/12/07	15 mussel lines in the water. Lines were taught, straight, and suitably marked (Figure 6 and Figure 7).
West Coast Oyster Growers (WCOG)	Small Bay	Mussels/oysters	2022/12/07	2 mussel lines in the water. Lines were taught, straight, and suitably marked (Figure 8).
Southern Atlantic Sea Farms 1 (SASF1)	Outer Bay North	Mussels	2022/12/07	15 lines in the water. Lines were taught, straight and suitably marked (Figure 9 and Figure 10).
Southern Cross Salmon Farm (SCSF)	Outer Bay North	Mussels	2022/12/07	11 lines in the water. Lines were taught, straight and suitably marked (Figure 11 and Figure 12).
Xesibe Aquaculture	Outer Bay North	Mussels	2022/12/07	6 empty top lines in the water. Lines were taught, straight and suitably marked (Figure 13).
Saldanha Bay Oyster Company (SBOC)	Big Bay	Oysters	2022/12/07	No lines were present on SBOC Big Bay site however, SBOC had two lines on BSPs site in Big Bay (Figure 14). Lines were taught, straight and suitably marked.
West Coast Oyster Growers (WCOG)	Big Bay	Mussels/oysters	2022/12/07	9 lines in the water. Lines were taught, straight and suitably marked (Figure 15).

7.4.1 Compliance photographs

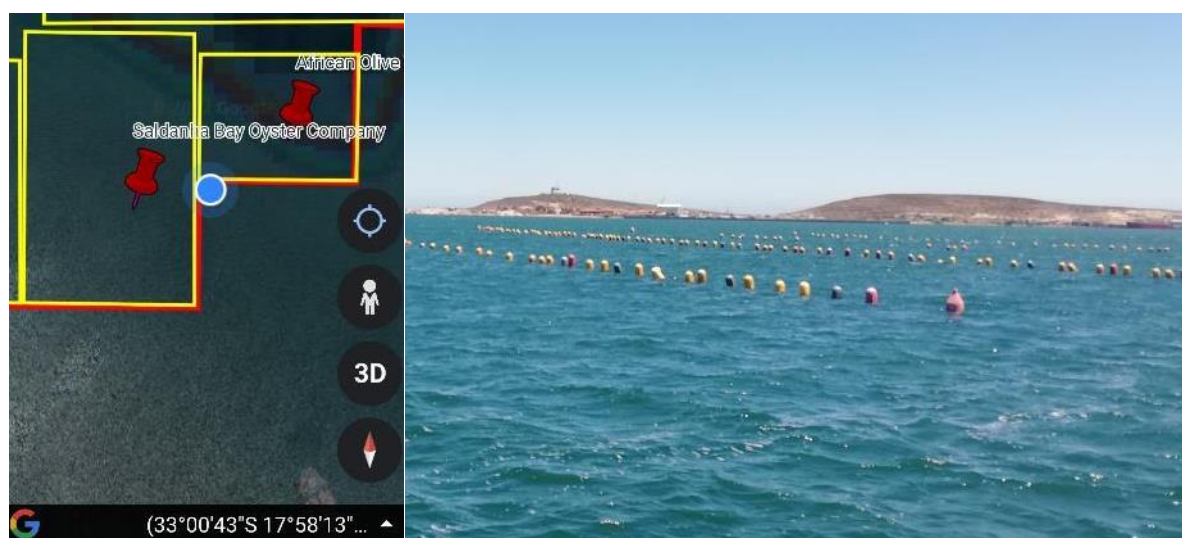


Figure 5. (Left) Live Google Earth pin of location of compliance photograph in relation to Saldanha Bay Oyster Company, Small Bay licence area (yellow boundaries). (Right) Oyster lines are suitably marked, straight and taught with no evidence of non-compliance.



Figure 6. (Left) Live Google Earth pin of location of compliance photograph in relation to West Coast Aquaculture licence area (yellow boundaries). (Right) Mussel lines are suitably marked, straight and taught with no evidence of non-compliance.



Figure 7. Fifteen mussel lines on WCA. Lines were taught, straight and suitably marked.

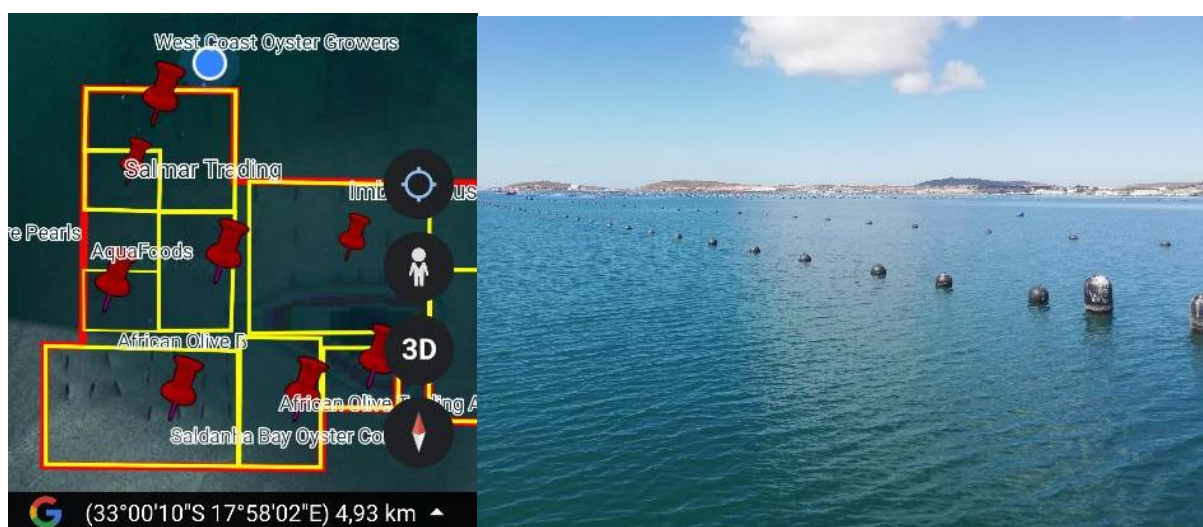


Figure 8. (Left) Live Google Earth pin of location of compliance photograph in relation to West Coast Oyster Growers Small Bay licence area (yellow boundaries). (Right) Two mussel lines present on farm with no evidence of non-compliance.

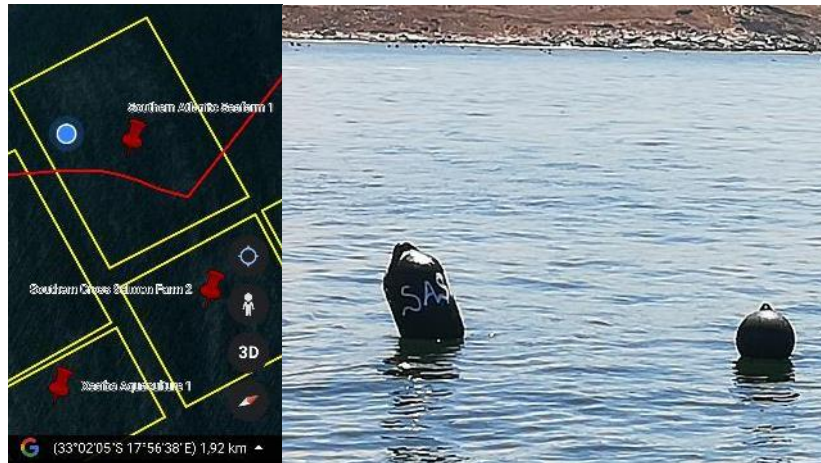


Figure 9. (Left) Live Google Earth pin of location of compliance photograph in relation to Southern Atlantic Sea Farms (Outer Bay North) licence area (yellow boundaries). (Right) Floats on SASF which are suitably marked.



Figure 10. Lines on SASF1 in Outer Bay North were straight, taught, and suitably marked.

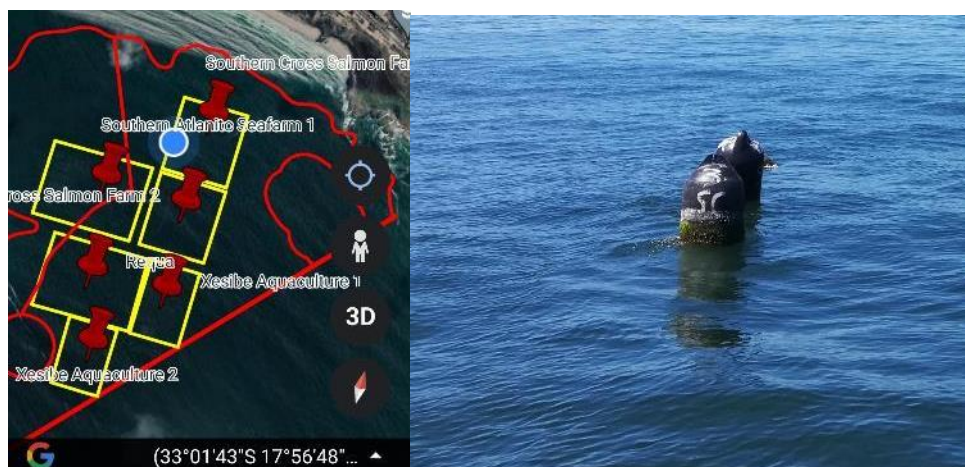


Figure 11. (Left) Live Google Earth pin of location of compliance photograph in relation to Southern Cross Salmon Farms (Outer Bay North) licence area (yellow boundaries). (Right) Floats on SCSF which are suitably marked.



Figure 12. Lines on SCSF in Outer Bay North were straight, taught, and suitably marked.



Figure 13. (Left) Live Google Earth pin of location of compliance photograph in relation to Xesibe license area (yellow boundaries). (Right) Floats on Xesibe that are suitably marked.

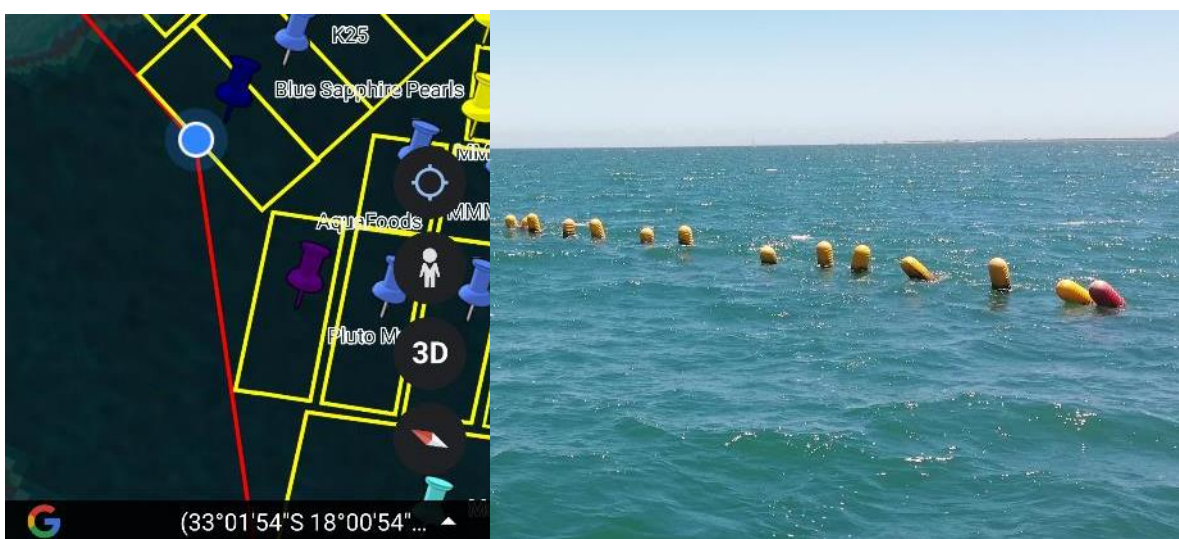


Figure 14. (Left) Live Google Earth pin of location of compliance photograph in relation to Blue Sapphire Pearl (BSP), Big Bay licence area (yellow boundaries). (Right) Saldanha Bay Oyster Company lines are present on BSP Big Bay site and they are taught, straight and suitably marked.



Figure 15. (Left) Live Google Earth pin of location of compliance photograph in relation to West Coast Oyster Growers Big Bay licence area (yellow boundaries, turquoise pin). (Right) Mussel lines are taught, straight and suitably marked showing no evidence of non-compliance.



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