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

SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE ENVIRONMENTAL CONTROL OFFICER SUMMARY REPORT 15



June 2023



Cover photo: Amy Wright

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Report prepared for:

Department of Forestry, Fisheries and the Environment

Branch: Fisheries Management



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Department:
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REPUBLIC OF SOUTH AFRICA

by:

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LIST OF ABBREVIATIONS

ADZ	Aquaculture Development Zone
AMC	Aquaculture Management Committee
Anchor	Anchor Environmental Consultants
Anchor	Anchor Research & Monitoring (Pty) Ltd
BB	Big Bay
BLP	Blue Lagoon Products
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
LAF	Lagoon Aqua Farms
LST	Lipophilic Shellfish Toxin
MLRF	Marine Living Resources Fund
NC	Non-compliant
NRCP	National Residue Control Programme
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

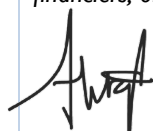
I, Julia Ndou hereby declare that I have no conflicts of interest related to the work of this report. Specifically, I declare that I have no personal financial interests in the property and/or development being assessed in this report, and that I have no personal or financial connections to the relevant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



28 June 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.



28 June 2023

COMPLIANCE WITH REGULATION 34 OF THE EIA REGULATIONS, 2014

The National Environmental Management Act (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 (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, 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 1.1
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 6.1
A summary and copies of comments received during any consultation process.	Section 6.2 Communications register
Any other information requested by the competent authority.	Section 6.2

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 June 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), 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 (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 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 original approved EMPr is dated August 2017 and has been amended three times in May 2020, June 2021, and June 2022. While the next amendment of the EMPr was scheduled for June 2023, no changes to the EMPr have been recommended by the ECO or the annual external auditors, and the EMPr will remain unchanged for this year. Should changes to

the EMPr be recommended after June 2023, the next review of the ADZ EMPr is scheduled for June 2024.

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 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. ADZ ECO appointments to date.

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).

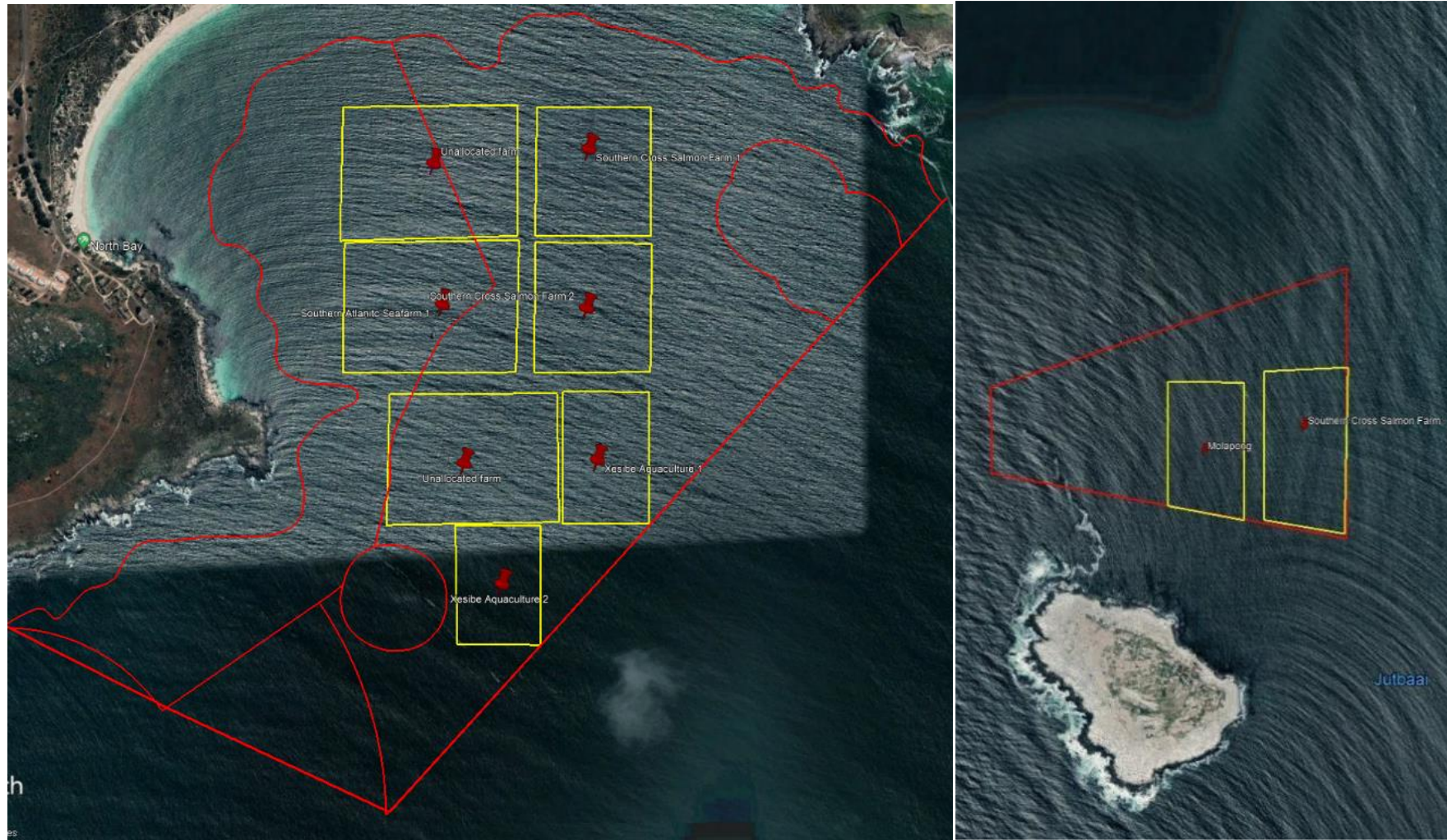


Figure 2.3. (Left) Bivalve culture in Outer Bay North (OBN) and (right) finfish culture in Outer Bay South (OBS).

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 2023 (2nd annual cycle) 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

During the June 2023 audit period, an additional instance of partial compliance was observed, increasing the total count from three in the May 2023 audit period to four. The previous three partial compliances relate to demarcation of the ADZ, enforcing maintenance and operational guidelines, and monitoring the shoreline for aquaculture debris. The newly observed instance of partial compliance pertains to SASH's inability to maintain their farms and the cessation of beach clean-ups. These partial compliances are summarised below:

- The ADZ must be accurately demarcated with South African Maritime Safety Authority (SAMSA) approved marker buoys (EMPr table 5-1, condition 2). To identify the required marker buoys for the ADZ, an Aids to Navigation (AtoN) Plan was developed (final draft submitted on 27 November 2022). Before the AtoN plan can be implemented, a Navigational Risk Assessment needs to be conducted for Saldanha Bay. The initial workshop for stakeholder engagement on this Risk Assessment was originally planned for 14-15 June 2023. However, it has been rescheduled and will now take place from the 11-12 October 2023.
- Operators must remain compliant with maintenance and operational guidelines (EMPr table 5-1, condition 6). Progress has been made with farm maintenance plans and is discussed in detail under Section 3.3 of Anchor Report 2014/15_1b (ECO site inspection report).
- Managers of the ADZ should ensure that the shoreline of the Bay is monitored for aquaculture equipment washed ashore (EMPr table 7-1, condition 2). Progress has also been made with operators monitoring the shoreline and removing aquaculture debris, which is discussed in detail in Section 3.6 of Anchor Report 2014/15_1b. While SASH group have committed to beach clean ups in Outer Bay North and Big Bay, SASH group is currently undergoing business rescue, which may present challenges to effecting beach clean-ups.

- Despite being in business rescue, SASH must initiate the 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 — JUNE 2023

Continuing through the June 2023 audit period, Southern Atlantic Sea Holdings (SASH) is undergoing business rescue and has appointed business rescue practitioners, Claritas, to, on a temporary basis, assist in restructuring, overseeing and supervising the management, affairs and business of the SASH farms.

The ECO has made attempts to obtain information regarding the ongoing situation with SASH operations in Saldanha Bay. As an Operator within the ADZ, SASH is required to comply with operational, maintenance and closure requirements set out in the EA and EMPr. Concerns regarding the current state of SASH operations and maintenance and communication thereof were highlighted during the Aquaculture Management Committee (AMC) meeting on May 29, 2023.

The main concern was since Claritas assumed responsibility for the business rescue, no feedback on the status or progress on a number of key issues pertaining to legislative requirements of operation and maintenance, despite repeated requests. It was a matter of urgency for the AMC to maintain ongoing communication and coordination to ensure that the farm adheres to the operational guidelines outlined in the EA and the EMPr.

Operators are continuing to use pressure sprayers to remove the fouling organisms from in-water infrastructure equipment on the Pepper Bay Jetty. This results in fouling organisms being discarded back into the marine environment. This introduction of waste organic matter within the Small Bay environment may cause changes to physico-chemical conditions in the water, with potentially negative impacts on the marine environment. Furthermore, the sediment and shell waste has resulted in sedimentation next to Pepper Bay Jetty, decreasing the water depth next to the Jetty. This shallower water prevents vessels from coming alongside the Jetty at low tide and restricts aquaculture activities such as offloading harvested product. Land-based activities, including those described above, are excluded from the ADZ EMPr and EA. However, as these activities are linked to the operation of the ADZ and contravene other environmental legislation (e.g., Section 28 of NEMA, Duty of care and remediation of environmental damage). To identify possible solutions or an alternative practice, discussions within the AMC and between the DFFE Project Management Team and operators are ongoing.

3.4 SUMMARY OF COMPLIANCE WITH THE EA AND EMPr

In June 2023, 23 conditions of a possible 27 were auditable, which is equivalent to the auditable conditions for the May 2023 period (Table 3.1). Despite a slight increase in partial compliance, the ADZ achieved an overall compliance score of 87% during the audit period of June 2023. This indicates that there has been no change in the compliance percentage compared to the previous audit conducted in May 2023 (Table 3.1, Figure 3.1).

Table 3.1. Compliance over time April – June 2023.

Audit Date	Total applicable Conditions	Compliance percentage	Compliant	Partially Compliant	Non-compliant	Not applicable
2023/04/06	23	87%	20	3	0	4
2023/05/09	23	87%	20	3	0	4
2023/06/15	23	87%	20	4	0	4

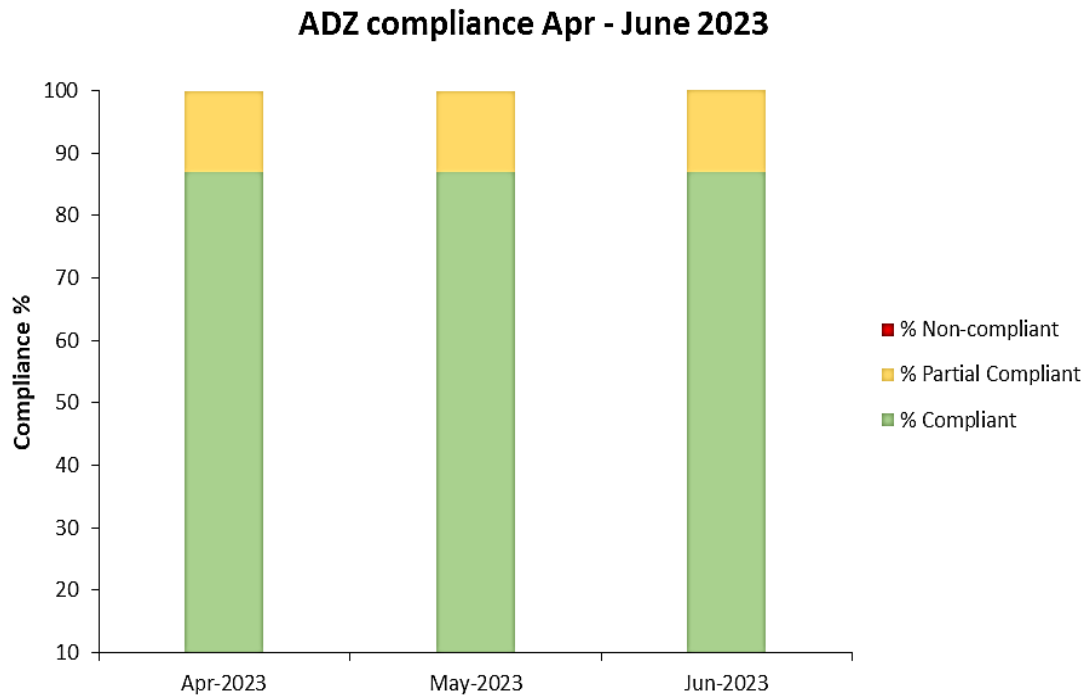


Figure 3.1. ADZ compliance for year 2 of ECO audits conducted by Anchor (April 2023 to June 2023).

3.5 OPERATOR LEVEL FINDINGS

3.5.1 FARM INSPECTIONS

On 15 June 2023, the ECO conducted on-water inspections and full document review for two farms in Small Bay, namely Aquafoods SA (AQU) and Salmar Trading (SAL). The farms inspected, location, date, compliance with operational guidelines and a comment on the in-situ observations are provided in Table 3.2. AQU was partially compliant while Salmar Trading was fully compliant with the operational guidelines.

Table 3.2. Farms inspected during the June 2023 ECO site inspection and compliance feedback.

Farm name	Location	Species	Compliance status	Comment
Aquafoods SA (AQU)	Small Bay	Mussels/oysters	PC	21 Mussel lines and 7 Oyster lines, all taut, straight, suitably floated and marked with unique markers. However, 4 sinking lines were heavy and ready for harvesting (Figure 3.2).

Farm name	Location	Species	Compliance status	Comment
Salmar Trading (SAL)	Small Bay	Oysters	C	11 oyster lines, all lines were taut, straight, suitably floated and marked with unique markers (Figure 3.4).

AQU had lines that were sinking and ready for harvesting (mostly mussel lines), and some end floats were sunken or missing (Figure 3.2). Increment weather had prevented earlier harvesting. The windy conditions at the time of the site inspection meant that some lines were observed to be not fully straight (they were being blown downwind), a situation likely exacerbated by the heavy lines. However, AQU's workers were harvesting from the lines at the time of the site inspection. AQU confirmed that maintenance is done on a weekly basis, preferably on a Thursday or Friday depending on weather conditions. In addition, AQU indicated that they have implemented new black floats with a red painted unique identifier (Figure 3.3). These floats are used to replace the old ones which require replacement during maintenance.

All oyster lines belonging to SAL have sufficient space between them, were taut, straight, suitably floated and marked with unique identifiers (green end floats) (Figure 3.4). The farm owner explained that it is best practice to have them spaced to avoid having the lines close together so that entanglement does not occur. Furthermore, it is easier for their boat to move between lines when seeding or harvesting to avoid damage of the infrastructure.

Both farms dump their biowaste (the mussel and oyster shells) at Weskus High School. This is not a formal nor accredited waste management facility. Apparently, the biowaste is used as one of the materials when filling up potholes. Some residents collect the biowaste for chicken feed. The farm owner from SAL uses this biowaste as a fertiliser in his farm. Both farms previously delivered their biowaste to NatGro organic treatment facility in Langebaan. It was fully accredited and registered to accept biowaste from all Saldanha aquaculture farmers, including AQU and SAL. This facility was able to receive waste from farmers at a nominal dumping fee, providing monthly waste reports and safe disposal certificates as deliverables. However, it has ceased to accept biowaste from farmers due to the complaints from residents regarding foul smells. It is crucial for the farmers to be proactive in managing their waste responsibly and find another waste management facility as soon as possible.

3.5.2 COMPLIANCE PHOTOGRAPHS

AQUAFOODS SA



Figure 3.2. AQU longlines mostly observed to be straight, taut, suitably floated, and marked with unique identifiers (top and bottom left). Live Google Earth pin of location of compliance photograph in relation to AQU, Small Bay licence area (yellow boundaries) (top right). Approximately 4 sinking lines were noted (bottom right).



Figure 3.3. Replacement floats for maintenance purposes.

SALMAR TRADING



Figure 3.4. SAL oyster lines observed to be taut, straight, suitably floated and marked with unique identifiers (top left). Live Google Earth pin of location of compliance photograph in relation to WCOG, Small Bay licence area (yellow boundaries) (bottom left).

3.6 FARM MAINTENANCE PLAN FEEDBACK

Blue Ocean Mussels (BOM) and Saldanha Bay Oyster Company (SBOC) provided farm maintenance plans on 20 July 2022 as requested by the ADZ ECO in response to non-compliances with the infrastructure guidelines reported during the June 2022 audit period. These plans were reviewed by the ADZ ECO and AMC and implemented by the relevant operators. Progress as per these plans has continued during the June 2023 audit period, and included maintenance to clean and remove lines, to repair and rebuild dilapidated rafts, and to put each raft on its own mooring (per the operational guidelines). Feedback for progress made up to 21 June 2023 with maintenance plans are given under Section 3.6.1 (for SBOC) and Section 3.6.2 (for BOM).

Non-compliances with the infrastructure and operational guidelines were observed on Requa Enterprises Outer Bay North farm during the February 2023 site inspection. The progress with maintenance and the development of the maintenance plan as of 21 June 2023 are provided in Section 3.6.3.

Southern Atlantic Sea Holdings (SASH) group have recently entered business rescue through Clarita's Business Rescue, Restructuring and Advisory. Clarita's has therefore taken over many aspects of farm operations, and the progress on maintenance of these farms is discussed in Section 3.6.4.

3.6.1 SALDANHA BAY OYSTER COMPANY

The remaining maintenance tasks involve the retrieval and removal of two buried lines, along with their associated buried mooring buoys. Additionally, there was a need for biofouling

removal and mooring inspections. Unfortunately, these buried lines along with the related infrastructure have not been found yet, and therefore, the necessary maintenance progress remains the same as the May 2023 audit period (Table 3.3). The ECO took further action regarding this issue and discovered that the most recent dive inspection to locate the buried lines occurred in June 2023 (the farm owner did not provide an exact date). The next inspection is scheduled for July 2023, although the specific dates are yet to be confirmed.

Table 3.3. Maintenance progress for SBOC, June 2023.

Maintenance item	Initial number	Number addressed	Total remaining
Longlines for removal	11	9	2
Buoys to be cleaned of biofouling	32	30	2
Subsurface inspection and cleaning of biofouling (shackles, mooring lines, and chains)	32	30	2
Divers inspect moorings to ensure that they have not moved and are in place	24	22	2

3.6.2 BLUE OCEAN MUSSELS

Since the last update in May 2023, the raft that needed reconstruction has been fully restored. Additionally, seven of the grouped rafts have not been relocated to their respective moorings (Table 3.4). This is still quite a challenging process for the Operator, and progress is still ongoing. Blue Ocean Mussels will successfully bring their farm back into compliance with the operational guidelines once these mooring have been separated.

Table 3.4. Maintenance progress for BOM, June 2023.

Maintenance item	Initial number	Number addressed	Total remaining
Restore raft	15	15	0
Maintain raft	20	20	0
Rebuild raft	4	3	0
Move to separate mooring	26	19	7

In order to separate rafts lashed to one another, mooring blocks need to be moved and repositioned. The existing mooring blocks are embedded to the ocean floor, which represents a challenge to repositioning. However, new mooring blocks have been sourced. Procuring the chain required to attach rafts to the mooring blocks is the current challenge as new chain is very costly but, BOM are investigating their options. To reduce buffeting impact between rafts, prevent further damage, and reduce the risk of environmental incident, 25 litre drums have been placed between the rafts to function as fenders. Rafts remaining lashed together include:

- 30 & 37
- 47 & 43
- 17 & 6
- 34 & 46
- 22 & 41
- 20 & 44
- 39 & 40

3.6.3 REQUA ENTERPRISES

On June 8, 2023, Requa was issued a letter in accordance with the instruction of the Aquaculture Management Committee (AMC). The letter was issued due to their failure to submit a maintenance plan to the ADZ ECO by March 17, 2023. This plan was to outline the actions to be undertaken for planned maintenance and to provide a timeline with estimated completion dates. At the AMC meeting held on 29 May 2023, it was agreed that immediate steps need to be taken to retrieve the sunken infrastructure, and that a maintenance plan must be produced by 30 June 2023. This plan must take into consideration the ECO recommendations as detailed below, and must indicate the time frames of implementation, as well as a methodology to track the outstanding infrastructure:

- Locating and removing sunken longlines (note that these may be buried under sand now due to the swells and currents in Outer Bay North).
- Retrieval and cleaning of biofouling from sunken floats and end floats (end floats are attached to mooring blocks).
- Cleaning biofouling from chains and shackles attached to moorings.
- Locating moorings (the location of the moorings should be present in the mooring plan that would have been submitted to the Department for Requa to receive their Mariculture Right and/or initial aquaculture permit).
- Mooring inspections (by divers to determine integrity of infrastructure).

Additionally, the AMC requested that Requa completes or shows progress on restoring their farm on 31 July 2023 and then ongoing monthly reports should be supplied to the ADZ ECO to track progress.

3.6.4 SOUTHERN ATLANTIC SEA HOLDINGS

Southern Atlantic Sea Holdings (SASH) is currently undergoing business rescue and has appointed business rescue practitioners, Claritas, to, on a temporary basis, assist in restructuring, overseeing and supervising the management, affairs and business of the SASH farms. Eventually, the business rescue practitioners will devise, prepare, develop and implement a business rescue plan. The SASH manager is available to assist where possible; however, all negotiations and discussions are conducted through the business rescue practitioners.

In several email exchanges (dated May 8, 2023, May 16, 2023, and May 24, 2023), the ECO has made attempts to obtain information regarding the ongoing situation with SASH operations in Saldanha Bay. As an Operator within the ADZ, SASH is required to comply with operational, maintenance and closure requirements set out in the EA and EMPr. Concerns regarding the

current state of SASH operations and maintenance and communication thereof were highlighted during the Aquaculture Management Committee (AMC) meeting on May 29, 2023. These include that the ECO was not formally notified about SASH's business rescue proceedings, and that important documentation, namely Farm Monitoring Reports (FMRs) that SASH acknowledges as required, were not submitted or not submitted on time, with no notification given about late submission (FMRs are the submitted on or before the 15th of each month). All outstanding FMRs were submitted late on 1 June 2023.

The main concern was since Claritas assumed responsibility for the business rescue, no feedback on the status or progress on a number of key issues pertaining to legislative requirements of operation and maintenance, despite repeated requests. It was a matter of urgency for the AMC to maintain ongoing communication and coordination to ensure that the farm adheres to the operational guidelines outlined in the EA and the EMPr.

Information regarding the following points was required by the AMC and ECO:

- A list of all farms that are currently under a maintenance agreement with SASH.
- The future plans for the maintenance farms managed by Claritas.
- Specific plans for each farm, including the possibility of decommissioning.
- Questions regarding whether the farms will continue to seed and harvest products.
- Plans in place to continue with biomonitoring.
- Plans for Southern Atlantic Sea Farms 1 (SASF1), SASF2 and Southern Cross Salmon Farm (SCSF).

The DFFE held a meeting with the SASH group and Claritas on 20 June 2023 to discuss the business rescue proceedings, and the implications thereof for ADZ management. The appointed business rescue practitioners were forthcoming about issues surrounding funding and the limited resources currently available to them. They confirmed that there is currently no maintenance or inspection of lines on any of the SASH farms or those farms that SASH maintains. In response, the DFFE detailed concerns about the current state of SASH operations, and maintenance of the farms they service. These included sinking lines, equipment wash down at sea, potential entanglements and other environmental risks. The business rescuers mentioned that they are in a process of negotiating with two potential parties to develop a transaction to take the business forward.

The DFFE requested additional actions to be undertaken by the business rescuers and they highlighted concerns during the meeting were as follows:

- SASH went into business rescue beginning of May 2023 and its two subsidiaries SASF and Southern Cross Salmon Farm also went into business rescue towards the end of May 2023. It was concerning that the DFFE and the AMC were not informed.
- The business rescuers agreed to forward a list of farms that they have maintenance agreements with. A concern was raised that the business rescuers did not have contact details for some of their client farms.

- The business rescuers agreed to forward a list of longlines and rope ages for all the farms they have a maintenance agreement with and agreed that it be shared with whomever wishes to do experimental/verification harvesting.
- The business rescuers were also tasked to follow up regarding Biotoxin testing start date and when experimental/verification harvesting can start commencing. This should have started at the beginning of the month of June 2023 if they plan to harvest in July 2023 as there is a lead way of two weeks prior to harvesting required. However, this has not been done to date.
- Concerns were raised regarding recapitalisation solutions, given the major concern that the lack of maintenance on aquaculture infrastructure poses a potential threat to the marine environment, especially regarding entanglement risks.

It was agreed that, going forward, a meeting will be held every Friday between the SASH group and the DFFE (including the ECO) to ensure updates are clearly communicated across all parties. The first meeting was held on 23 June 2023 and 30 June 2023. The ECO team will try to secure access to the SASH farms during the July 2023 site visit to report back on the current state of the infrastructure in the water.

3.6.5 K25

K25 has a total of seven lines in water. During the April 2023 audit, all lines were taut, suitably marked, and not sinking. However, six of the seven lines were straight, but line 1 was attached to the same end float as line 2 on the northern side of the farm. This rendered the farm to be partially compliant with the infrastructure and operational guidelines. This farm has a maintenance with SASH and is not currently being maintained due to insufficient financial resources. The ECO will attempt to visit the farm during the July 2023 site visit to verify the status of all SASH maintained infrastructure.

3.6.6 PLUTO MUSSELS AND TRADING

During the April 2023 audit, visible end floats were appropriately marked with unique identifiers. However, several issues were identified with the end floats. Specifically, three end floats were found to be sunken, and one was positioned very low in the water. On the southern side of the farm, end float number 3 was sunken, and end float number 6 was very close to the water's surface. Similarly, on the northern end of the farm, end floats number 5 and 6 were observed to be sunken. As a result of the sunken end floats, it was not possible to determine whether the lines were taut and straight.

On the 20 June 2023, Pluto Mussel and Trading farm owner indicated that due to the SASH business rescue proceedings he decided to sign a new contract with Gallo Group to take over farm maintenance and subsequently buy its product. The farm owner further elaborated that they have not harvested product in their farm located in Big Bay. Sampling tests have not commenced, and it was anticipated that it may be done on Thursday 22 June 2023 depending on the wind speed. However, the Gallo Group's feedback on this matter is still pending, and the ECO is still awaiting their response.

Furthermore, on 21 June 2023 the owner notified the ECO that he was dissatisfied with the SASH group because they did not inform him of harvesting details on his farm. Despite making

multiple attempts to obtain statements or FMRs regarding mussel production, in order to verify the total tonnage harvested by SASH, he has not received any information thus far. Furthermore, the farm owner also requested information from SASH regarding the percentage they achieved from the wet weight, as well as the percentage achieved for graded or processed weight specifically for the 2021 product. However, no information has been provided up to the present time. The farm owner subsequently reached out to the DFFE seeking assistance in determining the mussel tonnages from previous months on his farm.

3.6.7 WEST COAST OYSTER GROWERS

During the May 2023 audit, there were a total of eleven (11) mussel lines observed on site. These lines were generally straight and had unique identifiers for easy identification. However, there were concerns regarding the weight of the lines, as they were quite heavy and sinking in the water. Specifically, end floats were found to be sunken on lines 2, 3, 5, 7, and 12, while line 1 was either completely sunken or missing.

Upon the ECO following up with the farm operator regarding this issue, the farm owner disclosed that no maintenance has been carried out so far due to SASH's ongoing business rescue proceedings. The owner mentioned attending two feedback sessions with the SASH group and is currently awaiting an update on when they can commence maintenance and harvesting activities on their farm.

3.6.8 BLUE LAGOON PRODUCTS

Some lines were taut and straight, and unique identifiers were present. Two lines were attached to the same end float and these lines were not straight or taut. The farm owner indicated that that this was dealt with immediately upon the ECO's notification and is no longer an issue.

3.7 FARM MONITORING REPORTS (FMRs)

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.

An improved level of compliance was observed during the June 2023 audit period for meeting the FMR submission deadline. At the time of preparing this report, all 22 out of a total of 24 FMRs were submitted within the designated timeframe, with no pending outstanding submissions. All farms with sales provided supporting documents (Table 4.1).

Table 3.5. FMR Submission status, supporting production verification documents and visual inspection logs. Late submissions, lack of supporting documents or non-provision of visual logs are highlighted in red.

Farm name	Location	Species	Date	Supporting Docs	Visual Inspection Log
African Olive Trading	Small Bay	Mussels	2023/06/19	yes	yes

Farm name	Location	Species	Date	Supporting Docs	Visual Inspection Log
Aqua Foods SA	Small Bay	Mussels/ oysters	2023/06/15	yes	yes
Aqua Foods SA	Big Bay	Mussels/ oysters		N/A – no active farming	
Blue Lagoon Products	Big Bay	Oysters		N/A – no active farming	
Blue Ocean Mussels	Small Bay	Mussels	2023/06/19	yes	yes
Blue Sapphire Pearls	Big Bay	Mussels	2023/06/14	no sales	no
Blue Sapphire Pearls	Small Bay	Oysters	2023/06/14	yes	yes
Cex Enterprises	Big Bay	Mussels		N/A - not operational	
Imbaza Mussels	Small Bay	Oysters	2023/06/13	yes	yes
K2019005713	Big Bay	Mussels	2023/06/01	no sales	no
K2019005725	Big Bay	Mussels	2023/06/01	no sales	no
Lagoon Aqua Farm	Big Bay	Mussels	2023/06/15	no sales	no
Madima General Agriculture Trading	Big Bay	Mussels	2023/06/01	no sales	no
Mika Growers	Big Bay	Mussels	2023/06/01	no sales	no
Mmmagri Consult	Big Bay	Mussels	2023/06/01	no sales	no
Pluto Mussels and Trading	Big Bay	Mussels	2023/06/01	no sales	no
Requa Enterprises	North Bay	Mussels		N/A – no active farming	
Saldanha Bay Oyster Company	Small Bay	Oysters	2023/06/14	yes	yes
Saldanha Bay Oyster Company	Big Bay	Oysters		N/A – no active farming	
Salmar Trading	Small Bay	Oysters	2023/06/04	yes	yes
Simunye Mussels	Big Bay	Mussels	2023/06/01	no sales	no
Southern Atlantic Sea Farms 1	Big Bay	Mussels	2023/06/01	no sales	no
Southern Atlantic Sea Farms 2	North Bay	Mussels	2023/06/01	no sales	no
Southern Cross Salmon Farm	North Bay	Mussels	2023/06/01	no sales	no
Ulwazi Kukutya	Big Bay	Mussels	2023/06/01	no sales	no
Wada Projects	Big Bay	Mussels		N/A - not operational	
Well Done Works	Big Bay	Mussels		N/A - not operational	
West Coast Aquaculture	Small Bay	Mussels/ oysters	2023/06/01	no sales	no
West Coast Oyster Growers	Big Bay	Mussels/ oysters	2023/06/01	no sales	no
West Coast Oyster Growers	Small Bay	Oysters/ mussels	2023/06/17	yes	no
Xesibe Aquaculture	North Bay	Mussels	2023/06/20	no sales	no

3.8 BEACH MONITORING BY OPERATORS

In September 2022, the Bivalve Shellfish Association of South Africa (BSASA) provided names of three members of the Aquaculture Industry who have committed to monitoring and cleaning beaches (Table 3.6). 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. Waste data has been provided for beach clean-ups for Small Bay and Big Bay. Detailed feedback has not been provided Marcus Island to date, however photographic evidence was provided in September 2022, due to the direction of the prevailing swell and current, minimal waste is anticipated to wash up on Marcus Island. No evidence of clean-up or waste data have been provided for Outer Bay North to date. However, Ernie Malan of SASH group (responsible for this clean-up) has advised that they are sourcing someone to conduct these clean-ups as the area falls within the Military Academy and has restricted access. Once a suitable candidate has been identified and appointed, data and evidence of waste removal will be provided for the Outer Bay North beaches.

In Small Bay, the waste collected primarily consists of litter and general waste, with only a small portion originating from the aquaculture industry (Figure 3.5). On the other hand, in Big Bay, the majority of 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 3.6). However, no waste collection data or information regarding aquaculture floats has been provided or observed for Big Bay in April and May 2023. This is mainly due to the fact that the SASH group have recently entered business rescue. It is crucial that beach clean-up data for Outer Bay North is urgently provided. Either SASH continues to clean-up these beaches, or a suitable replacement be found, and the ECO should be updated on these activities.

Table 3.6. 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
Ernie Malan	South Atlantic Seafood Holdings (SASH)	Big Bay (BB)	Spreeuwalle – Paradise beach	Twice a month
Ernie Malan	SASH	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

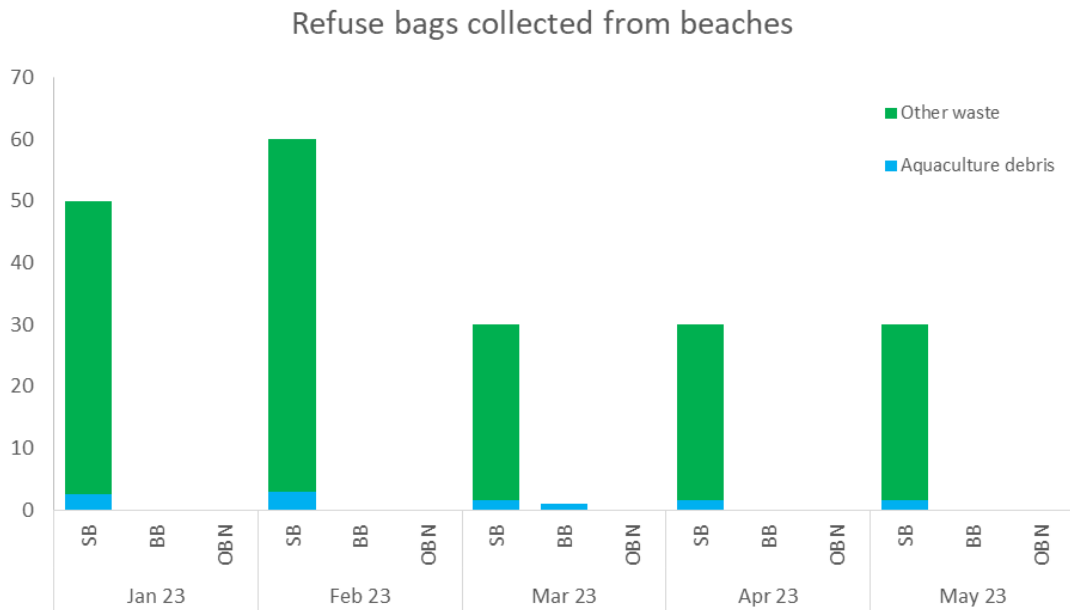


Figure 3.5. Waste collected in refuse bags from beaches in the various precincts. Total waste collected and portion of waste constituting aquaculture debris is presented.

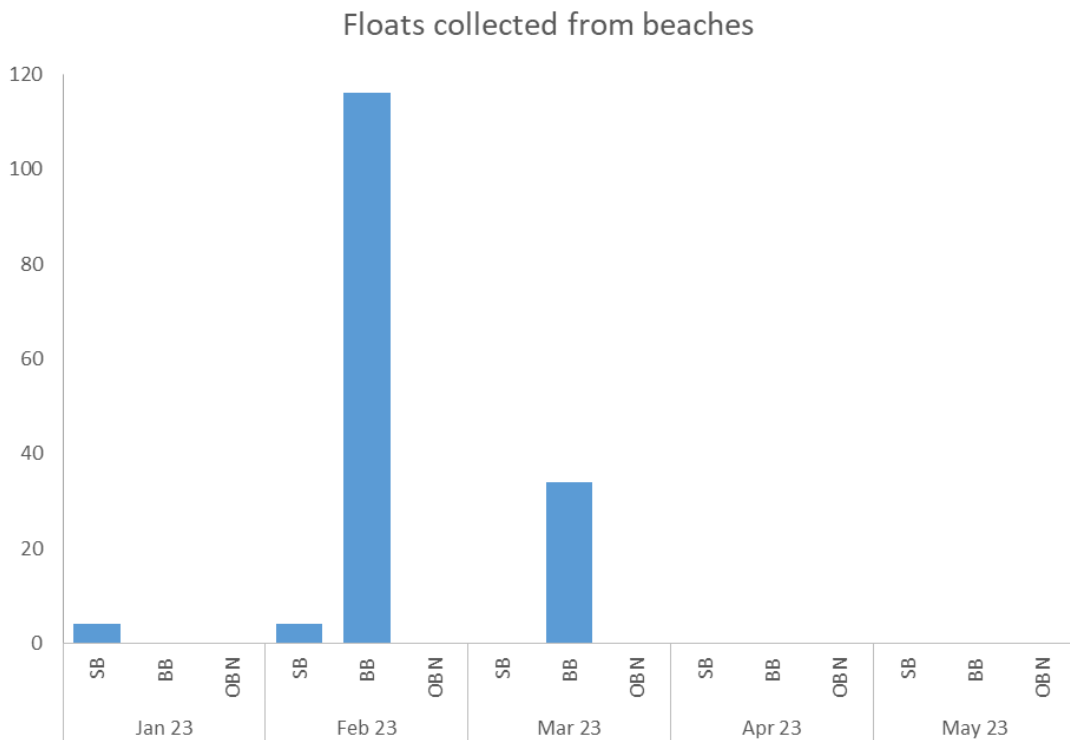


Figure 3.6. Floats collected from beaches in the various precincts.

3.9 BEACH INSPECTION BY ECO

Small Bay beach near Blue Bay Lodge was inspected by the ECO during the June 2023 site inspection (Figure 3.7). During the beach inspection a number of articles of ADZ infrastructure

and debris were observed on the beach (Figure 3.8). These included floats, baskets and rope. No identifying features were visible on any of the items. The farmer owners/operators and business rescue practitioners have been notified of the existence and location of this equipment and plans have been made to remove it.



Figure 3.7. Small Bay beach near Big Bay Lodge showing no aquaculture debris or equipment.



Figure 3.8. Aquaculture infrastructure including black crate (top left), blue drum/float (bottom left), production ropes (middle top and bottom) and white 25L float (top left) washed up at Small Bay beach near Big Bay Lodge. Google Earth live location indicating where this waste is located (bottom right).

3.10 INCIDENTS DURING THE LAST MONTH

One incident was reported on the 21st of June 2023 that four cut lines were observed in Spreeuwalle Beach located in the Big Bay precinct (IR June 23-01). As of 23 June 2023, Big Bay

operators have been notified, and two Operators have attempted to check the lines to identify the owner to ensure that the lines are removed on multiple occasions. No cut lines were found during this assessment, but ongoing checks will be undertaken. A site inspection will be undertaken as soon as possible to conform removal and that maintenance requirements are being followed.

It was also reported that vehicles have damaged areas of Spreeuwalle beach (IR June 23-02), specifically the vegetated supra-tidal beach platform south of the iron ore quay. It was reported that this is due to ADZ operators accessing the beach via vehicle to collect infrastructure from the beach. A site inspection will be undertaken as soon as possible to confirm and assess the extent of the damage, which will inform the next steps.

In a non-ADZ related incident, on the 19 June 2023 a pipe measuring approximately 4 meters in length and half a meter in diameter was discovered on the beach near Strandloper guesthouse (Figure 3.9). The farm owners and operators were notified, but there are uncertainties about the ownership of the pipe — similar pipes are used as fenders by other operations within the Bay. As the pipe cannot be directly linked with any ADZ operations, this has not been flagged as an official ADZ incident. As of 30 June 2023, no further information was available regarding whether the pipe has been removed from the beach or not. This matter is being followed up by the ECO and updates will be provided in the July 2023 site inspection report.



Figure 3.9. A pipe found on the beach opposite Strandloper guesthouse on Beach Road, Saldanha

4 ADZ MANAGEMENT

4.1 BAY USER SAFETY

The ADZ must be accurately demarcated with South African Maritime Safety Authority (SAMSA) approved marker buoys (EMPr table 5-1, condition 2). To identify the required marker buoys for the ADZ, an Aids to Navigation (AtoN) Plan was developed (final draft submitted on 27 November 2022). Before the AtoN plan can be implemented, a Navigational Risk Assessment needs to be conducted for Saldanha Bay. The initial workshop for stakeholder engagement on this Risk Assessment was originally planned for 14-15 June 2023; however, it has been rescheduled and will now take place from the 11-12 October 2023.

4.2 BIVALVE PRODUCTION VOLUMES

Graded production volumes in the ADZ are recoded monthly. Production volumes for June 2023 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. 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.

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	Monthly graded production May 2023	Graded production				
		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)
Small Bay	551	2847	1936	2921	2621	1377
Big Bay	0	189	240	480	700	135
Outer North Bay	0	433	297	330	175	0
Outer South Bay	-	-	-	-	-	-
Total graded	551	3 468	2473	3731	3496	1513
Approximate ungraded production	295	6 497	4 707	7 228	6664	2808

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 DFFE Branch Fisheries Management engage with NatGro Organics to identify their specific concerns for composting aquaculture biological waste and attempt to find a solution to these concerns.
- The Incident Report form should be modified to enhance its user-friendliness for the public when making reports. It is recommended to include a dedicated signature block for the person who witnessed the incident, in addition to the existing blocks for the responsible person and the ECO.
- Once the Navigational Risk Assessment is concluded, the AtoN Plan should be finalised, and the responsible parties should ensure implementation and execution of this plan.
- Monitoring progress with the maintenance plans should continue.
- Monitoring of beach waste data submitted by the Operators should continue. Either SASH continues to monitor and clean-up Outer Bay North and Big Bay beaches, or a suitable replacement be found, and the ECO should be updated on these activities.
- The main receiving beaches should continue to be included in ECO site inspections.
- The DFFE: Fisheries Management should continue discussions within the AMC forum and with operators to determine a solution to the accumulation of sediment due to wash down activities on Pepper Bay Jetty. This matter was raised in the last AMC meeting (27 March 2023), and it was agreed that discussions between the Department and Saldanha Bay municipality need to occur.

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.
- The Operators must engage with DFFE: Fisheries Management to assist in determining a solution to the accumulation of sediment due to wash down activities on Pepper Bay Jetty.

- Operators should attempt to determine collaborative solutions to the illegal wash-down practice occurring at Pepper Bay Jetty.

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 May 2023.
 - Documents register May 2023.
2. Information requested by the competent authority:
 - None.
3. Interviews, discussions, and other communications (see Table 6.1).

Table 6.1. Discussions conducted during the June 2023 ECO site inspection.

Individual	Organization	Subject
Aquafoods SA	Marizann Steyn	ECO audit of Aquafoods SA
Salmar Trading	Gabriel Lee	ECO audit of Salmar Trading

6.2 COMMUNICATIONS

Communications received by the ADZ ECO during the June 2023 audit period are presented in Table 6.2 below.

Table 6.2. Individual, organization, and purpose of consultation during the June 2023 audit period.

Individual	Organization	Subject
Julia Ndou	Saldanha ADZ ECO	Updated FMR report version 5
Connie Mgidi	Simunye Mussels	Monthly Environmental reporting
Michelle Pretorius	DFFE: Operation Phakisa Delivery Unit	BOMs request for installation of additional infrastructure requirements
Julia Ndou	Saldanha ADZ ECO	Request for Requa maintenance plan
Julia Ndou	Saldanha ADZ ECO	Urgent request for an update on the SASH group business rescue proceedings
Julia Ndou	Saldanha ADZ ECO	Farm owner's responsibility for FMRs
Julia Ndou	Saldanha ADZ ECO	List of lines ready for harvesting
Nceba Buhlungu	Pluto Mussels and Trading	Pluto Mussels and Trading: Farm owner's responsibilities
Julia Ndou	Saldanha ADZ ECO	Update on the SASH group business rescue proceedings
Julia Ndou	Saldanha ADZ ECO	EMPrs for Pepper Bay Jetty
Julia Ndou	Saldanha ADZ ECO	Biowaste from aquaculture farms
Nceba Buhlungu	Pluto Mussels and Trading	Pluto Mussels: Request for assistance

Individual	Organization	Subject
Sue and Toni Tonin	Residents	Marine mammal entanglement risk in Saldanha Bay following winter swells
Julia Ndou	Saldanha ADZ ECO	SASH business rescue: progress meeting I
Sisanda Dalasile	Saldanha ADZ Secretariat	Required documentation from Lagoon Aqua Farm
Nicole Limberis	DFFE: Legal Officer	AMC letter to Requa



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