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Konsulterende Omgewingskundiges

**Basic Assessment Report:
Proposed Molapong Aquaculture Project, Saldanha Bay
(Ref no: 16/3/3/1/F4/17/3014/17)**

Comments and Responses report

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1. Public Participation summary

Pre-application Public Participation:

A **draft Basic Assessment Report (BAR)** was distributed to relevant authorities for initial comment in September 2016. The only comments received was from the Department of Agriculture, Forestry and Fisheries (DAFF) and the Saldanha Bay Municipality (SBM)- see Section 5 and 6 below. The comments received from authorities were taken into consideration in the compilation of the pre-application draft BAR.

In December 2016, a **pre-application BAR** was made available to identified stakeholders for the period from 21 December 2016 until 6 February 2017 (30 days, with 15 December-5 January excluded from the reckoning of days, as per the EIA Regulations) Background information letters with an indication of the available comment period, an invitation to register as an interested and affected party (IAP) and to comment were sent to a list of identified stakeholders (see section 2 below).

Posters were put up in public places to notify potential stakeholders of the availability of the pre-application Basic Assessment Report for comment. A copy of the poster, as well as photos of notices is included in Section 4 below.

Since the site is in the sea, the reports were made available for comment to known recreational users and other possible affected parties, as per information provided by DAFF.

Comments received during the pre-application Basic Assessment Report comment period were incorporated into the BAR. Comments received were collated in the issues trail, section 5, which includes responses to comments.

A site visit was also undertaken with the Department of Environmental Affairs, Oceans and Coasts on 10 February 2017 (see figure 6, section 4). The Department indicated that they will provide comment, if any, on the final Basic Assessment report.

Public participation after application submission:

An IAP register was opened and comments recorded (see section 2 for list of registered stakeholders and section 5 for comments recorded, section 6 for copies of comments). Registered IAPs were informed of the availability of the BAR for comment.

A notice was placed in the local newspaper, *Weslander*, to inform the public of the availability of the BAR for comment on Thursday 16 March 2017. The comment period: 20 March 2017 until 21 April 2017.

A site notice was placed on the cages at the current site, as well as other public places to notify interested and affected parties of the availability of the documents for comment. Proof of the above actions is included in section 3 below.

Focus group meeting was held with registered organisations on 22 May 2017, whereto members of the local press were also invited (*Weslander* and *Weskusontheline*). A panel of experts was asked to provide feedback at this meeting regarding the main issues raised, which included water quality, disease, socio-economic considerations, as well as public participation. The proceedings from this meeting were recorded and have been included in section 4. In addition to the focus group meeting, meetings were held with the Saldanha Bay Water Quality Forum Trust (27 June 2017), as well as BirdLife South Africa (30 June), notes from the discussions at these meetings, as well as follow-up correspondence, are also included in section 4.

The project has received further exposure through the media in national television (Focus on SABC3) and DSTV (Carte Blanche on M-Net) and various newspaper articles including in the *Sunday times*, *Weslander*, and online community and social media news sites (*Weskusontheline*, *SavetheLangebaanLagoon*, *PeopleAgainstAquacultureinSaldanha*).

2. Stakeholders

2.1 Identified stakeholders

The following list of identified stakeholders was provided by the Department of Agriculture, Forestry and Fisheries, being those identified for the Aquaculture Development Zone process. This list was used as basis to inform possible stakeholders to the proposed Molapong project.

Name	Capacity	Organization
Organs of State		
Molale, Reuben		DEA: Oceans and Coasts
Funanani Ditinti		DEA: Oceans and Coasts
Muller, Heinrich		DEA: Oceans and Coasts
Omar, Dr Razeena	Chief Director	DEA: Oceans and Coasts
Baijnath-Pillay, Nitasha		DEA: Oceans and Coasts
Boyd, Alan		DEA: Coastal Research
Khathi, Potlako		DEA: Oceans and Coasts
Makoala, Millicent		DEA
Angwenyi, Fhumulani		DEA
Oosthuizen, Herman		DEA: Coastal Research
Popose, Gcobani		DEA: Marine Protected Areas
Dlulisa, Siyabonga		DEA: Marine Protected Areas
Persad-Govender, Risha		DEA: Marine Protected Areas
Preston, Dr Guy	Deputy Director-General	DEA: Environmental Programmes
Nelukalo, Khathutshelo		DEA: Biodiversity Services
Sishuba, Nomahlubi		DEA: Biodiversity Services
van Reenen (Britz), Amanda	Director	DEA: IEM Framework and Policy Support
Engelbrecht, Chantel		DEA: IEM Framework and Policy Support
Solomons, Millicent	Director	DEA: Strategic Infrastructure Development
Ndobeni, Nelisa		DWS: Berg River CMA
Semoli, Belemane	Acting Chief Director	DAFF: Aquaculture and Economic Development
Njobeni, Asanda	Director	DAFF: Sustainable Aquaculture Management
Sankar, Kishan		DAFF: Operation Phakisa
Jika, Zimasa		DAFF: Aquaculture Authorisation
Jezile, Maxhoba		DAFF
Probyn, Trevor		DAFF: Research
Pitcher, Grant		DAFF: Research
Cockrill, Wally	Chief Marine Conservation Inspector	DAFF: MCS Compliance
Theron, Wade	Chief Fishery Control Officer (Acting Assistant Director)	DAFF
Marais, Ferdi	Local Observer	DAFF
van Wyk, Leon		DAFF
Horne, Peter		DAFF
Foord, John	Environmental Officer Specialised Production	DAFF
Endemann, Ferdie	Specialist Extension Officer	DoA: Aquaculture Farmer Support and Development
Sefike, Thabo		DoA: Aquaculture Farmer Support and Development
Motshetshe, Paseka		DoA: WC
Lamb, Ossie		Department of Public Works
Nel, Pierre		SANParks
Brink, William	Section Ranger	SANParks - WCNP
Louw, Willem	Manager: Park Planning and Development	SANParks
Van der Westhuizen, Marne	Manager: Planning and Implementation	SANParks
Cowell, Carly		SANParks
Bopape, Pat		SANParks
Johnson, Norman		SANParks
Anneckke, Wendy		SANParks
Oosthuizen, Ane		SANParks
Adriaanse, Kegan-Leigh		DEA&DP
La Meyer, Adri		DEA&DP
Arendse, Clement		DEA&DP: Coastal Management
Kamaseelan, Chetty		DEA&DP: Pollution Management
Peterson, Yazeed	Director	DEA&DP: Coastal Pollution Management
Hardcastle, Paul	Director	DEA&DP: Planning and Policy Coordination
Shippey, Karen	Chief Director	DEA&DP: Environmental Sustainability

Laros, Marlene	Director	DEA&DP: Biodiversity and Coastal Management
Williams, Rasheeq		DEA&DP: Department of Economic Development: Trade and Sector Development
Naiker, Mellisa	Control Environmental Officer	DEA&DP: Biodiversity and Coastal Management
Harmse, Peter		DEA&DP: Air Quality Management
Ackhurst, Albert		DEA&DP
Lakay, Mark		Dept of Economic Development and Tourism
Goosen, Johan		Western Cape Department of Health: West Coast District
Bailey, Bennett		Department of Cultural Affairs and Sport
Allies, Remo		Department of Cultural Affairs and Sport, Directorate: Sport and Recreation
Cengani, Phelisile		Department of Cultural Affairs and Sport, Directorate: Sport and Recreation
Duffell-Canham, Alana		CapeNature
Impson, Dean	Scientist	CapeNature: Freshwater Fish
Mortimer, Garth		CapeNature
la Grange, Lesa	Case Officer	SAHRA
Prins, Henry	Municipal Manager	West Coast District Municipality
Kotze, Doretha	Town and Regional Planner	West Coast District Municipality
Scheepers, Louis	Municipal Manager	Saldanha Bay Local Municipality
Gaffley, Lindsey	Town Planner	Saldanha Bay Local Municipality
Joubert, David		Saldanha Bay Local Municipality
Meiring, Marius		Saldanha Bay Local Municipality
Pronk, Frank	Councilor - Ward 5	Saldanha Bay Local Municipality
Don, Ryan	Councilor - Ward 3	Saldanha Bay Local Municipality
Vries, Stephanus T	Councilor - Ward 4	Saldanha Bay Local Municipality
Kruger, Andre	Ward Councillor	Saldanha Bay Local Municipality
Thys, Michael		Saldanha Bay Local Municipality
Duarte, Nazeema	Environment and Heritage	Saldanha Bay Local Municipality
Viljoen, Rejean		TPT
Brink, Quenton	Port Captain	TNPA
Naidoo, Neal	Environmental Specialist	TNPA
Mbatha, Nelson	National Environmental Manager	TNPA
Kordom, Quentin		TNPA
Links, Abigail		TNPA
Pieters, Netaneel		TNPA
Samuels, Donovan		TNPA
Dilima, Bongani		TNPA
Institutions / Organisations		
Kotze, Jaco	Chairman	Langebaan Ratepayers Association
du Plessis, Nadia and Kilroe-Smith, John		Club Mykonos Langebaan Home Owners Association (CMLHOA)
Walsh, Jimmy		SBWQFT, WC Biosphere, Bird life SA
Christo van Wyk	Chairman	SBWQFT
Rothenburg, Mike		Saldanha Bay Yacht Club, SBWQFT
Bews, Andrew	Commodore	Saldanha Bay Yacht Club
TBC		Weskus Sakekamer
Mukhadi, Fulufhelo	Deputy Director	SANBI: Biodiversity Policy Advice
Terrapon, Heather		SANBI: Biodiversity
Coetzer, Willem	Manager	South African Institute for Aquatic Biodiversity (SAIAB)
Paterson, Angus Dr	Managing Director	South African Institute for Aquatic Biodiversity (SAIAB)
Engel, Wendy	Research Officer	WWFSA: Sustainable Agriculture Programme
Carnegie, Alan		WESSA
Dreyer, Andre	Operations Manager	National Regulator for Compulsory Specifications (NRCS)
Marx, Jan Lt. Col. Dr.		South African National Defence Force (SANDF)
Pillay, Valason	Captain	South African National Defence Force (SANDF)
Smith, Dave	Colonel	Langebaanweg Airforce Base
Malepe, Sello	Captain	South African Seaward Defence Force (SAS) Saldanha
Frylinck, Casper		National Sea Rescue Institute (NSRI) Mykonos
Davidson, Vanessa		Marine Industry Association South Africa (MIASA)
Viljoen, Captain Mike		South African Maritime Safety Association (SAMSA)
TBC		Cape West Coast Biosphere Reserve
le Sueur, Bev	Chairperson	South African Sailing (SAS) Western Cape
Naude, JP		Western Cape Provincial Sport Federation
Harrison, Keith B		West Coast Bird Club
Industry		
Tonin, Antonio (Toni)		Saldanha Shellfish Growers Forum, Saldanha Bay Oyster Company
Tonin, Sue	Aquaculture	Bivalve Shellfish Farmers Association of South Africa
Maree, Audrey		Bivalve Shellfish Farmers Association of South Africa

Britz, Pete		Aquaculture Association SA
Krohn, Roger	Chairman	Aquaculture Association SA
Bok, Andre		Marine Finfish Farmers Association
Musson, Guy		Marine Finfish Farmers Association
van der Merwe, Gerrie		Trout SA
Ryan, Liam		MFFASA
du Plessis, Jacques		Abalone
Adams, Nolan	Farm manager	Africa Olive Trading (Pty) Ltd
Maree, Wayne	Manager	Aqua Foods SA (Pty) Ltd
Pienaar, Vosloo	Aquaculture	Blue Bay Aquafarm, Imbaza Mussels Pty Ltd
du Plessis, Jacques	Manager	Blue Ocean Mussels
Ruck, Kevin	Farm Manager	Blue Sapphire Pearls
Resoort, Krijn	Farm manager	Molapong
Brenner, Lionel	Manager	Oyster Catcher
Cheung Lee, Tsz (Gabriel)	Director	Salmar Trading
Machlachlan, Andrew	Farm manager	Southern Atlantic Mussels
Stander, Henk	Manager	Southern Cross Salmon Farm
Herbst, Wilhelm	Aquaculture	West Coast Aquaculture
Poggenpoel, SJ		West Coast Aquaculture
Lochner, Nelia	Aquaculture	West Coast Oyster Growers
Loubser, Nick	Farm Manager	West Coast Oyster Growers
Venter, Jonathan	Aquaculture	West Coast Seaweeds
Weaver, Ryan		Western Cape Trout Association
Rafuza, Sisa	Operation Phakisa farmer	
Other Stakeholders		
Barnard, Alan		Kite surfing / kite boarding
Bester, JP		
Black, Marina	Recreational User	
Bredenkamp, Hennie		Kite surfing / kite boarding
Bredenkamp, Sjoukje		Kite surfing / kite boarding
Carter-Brown, Clinton	Landowner and windsurfer	
Ceruti, Adrian		Atlantic Yachting cc
Clark, Barry		Anchor Environmental
Clavaux, Jan		Langebaan resident
Clemitsen, Michael		Ag Technical Services Limited (Agtec) and personal capacity
Collins, Andrew		Recreational User of Saldanha/Mykonos
Cronje, LP		
Davies, Perry-Anne		Ocean Sailing Langebaan
Deysel, Alan		Club Mykonos
Dimitri and Michelle	Management	Windchasers
Dixon, Len		
Douglass, Colleen		
du Toit, Hanneli	Manager	Langebaan Yacht Club
Dyer, Trevor		Saldanha Bay Yacht Club
Evans, Pat		
Forsyth, Andrew		Resident of Saldanha
Fourie, Allan		Cape Sports Centre
Fourie, Wesley	Management	Constantly Kiting Kitesurfing School
Giljam, Erica		
Haschick, Rory	Sector Specialist – Tourism, Aquaculture & Renewable Energy	Eastern Cape Development Corporation
Heald, Tanya		HOW Wildlife Rescue
Henderson, Elske		
Ibbotson, Jason	Management	Emporio Langebaan
Ibbotson, Jason	Management	Siren Kiteboarding
Kellett, Marie-Louise & Andrew		
Kessel, Lars		Royal Cape Yacht Club and Saldanha Bay Yacht Club
Khumalo, Madoda	Strategic Services Executive	Sea Harvest
Kitshoff, Phillip	Landowner in Langebaan	
Kotze, Dante		Dive Instructor at Mykonos Marina
Lewin, Johan		Requa
Lindenberg, Peter		
Louw, Jacobus		
Lundie, Rob	Landowner in Langebaan	
Maltby, Craig		Swimming
Marais, Trudy		Swimming, water aerobics and scuba diving
Martin, Robert		
Meintjes, Rob	Representative	Paddling Community of Langebaan
Midgley, Jeremy		Unknown

Muller, Miche	Local resident	
Munro, Rob		Water sports owner, sailing, surfing, SUP, windsurfing, swimming
Nel, Berneace	General Manager	Protea Hotel Saldanha Bay
Odendaal, WG		
Pretorius, Gert		
Pritchard, Seymour		Yachtsman and property owner
Robinson, Michael	Vice-President	South African Sailing
Roos, Susan and Paul		Langebaan Property Owner
Schreuder, Alwyco		CPM Vredenburg Area
Selby, John		Langebaan Resident
Sempill, Alastair		Environmental Consultant
Silverman, Alan		Saldanha Group
Smith, Karl		
Smith, Shane Jay		Langebaan business owner, sail training operation, Yacht Club Member
Stemmett, Bradley		User of Langebaan Lagoon
Teale, Antony		Cape Sports Centre, Langebaan
Tedder, John	Langebaan Property Owner	
Tedder, Nathalie	Langebaan Property Owner	
van Dam, Luke Knibbs		Diver in Langebaan
van der Linde, Magda		Langebaan Trailer and Boat Yard
van der Walt, Louis	Chairman	Langebaan Sport Forum
van Heerden, Jaques M	Contact person	King Solomon Foods (Pty) Ltd
van Zyl, Nicole		Langebaan Yacht Club
Warmerdam, David		Langebaan Yacht Club
Watters, Mark		
Wicht, Andre	Owner	Blue Bay Lodge
Wicht, Mart-Mari	Operations Manager	Blue Bay Lodge
Wright, Riaan		Marina Club Mykonos
Zeelie, Rachel		Chapmans
Massie, Vera	Environmental consultant	Anchor Environmental
Roed, Chris	Consulting Engineer in Saldanha	
Reuther, Sue	EAP	SRK
Jesicca du Toit	EAP	SRK
Libraries		
Librarian		Saldanha Public Library
Librarian		Langebaan Public Library

2.2 Registered stakeholders

Letters informing stakeholders of the availability of reports were sent twice to the complete list – pre-application, as well as for the second round of comment after the application was submitted. For the final report, letters were sent to registered stakeholders. The following has been registered as interested and affected parties, which also forms the IAP register:

NAME	DEPARTMENT
1. Milicent Solomons	Department of Environmental Affairs
2. Sindi Ndlomo	Department of Environmental Affairs
3. Moses Ramakulukusha	Department of Environmental Affairs: Integrated Coastal Management
4. Safwaan Abrahams	DEA&DP Development Management Region 1
5. Taryn Dreyer	DEA&DP Development Management (Region 1)
6. Alwan Gabriel	DEA&DP Development Management (Region 1)
7. Ieptieshaam Bekko	DEA&DP Coastal Management
8. Asanda Njombeni	DAFF Sustainable Aquaculture Management
9. Belemane Semoli	DAFF Sustainable Aquaculture Management
10. Michelle Pretorius	DAFF Sustainable Aquaculture Management
11. Kishan Sankar	DAFF Operation Phakisa Delivery Unit
12. Andrea Bernatzeder	DAFF Operation Phakisa Delivery Unit
13. Lesa la Grange	SAHRA
14. Marne van der Westhuizen	SANParks Planning and Implementation – Cape Region
15. Pierre Nel	SANParks
16. Dean Impson	Cape Nature
17. N Duarte	Saldanha Bay Municipality
18. Kruger, Andre	Municipal Councillor
19. Don, Ryan	Municipal Councillor
20. Vries, Stephanus T	Municipal Councillor

NAME	DEPARTMENT
21.Pronk, Frank	Municipal Councillor
22.Doretha Kotze	West Coast District Municipality
23.Ethel Coetzee	TNPA
24.Donovan Samuels	TNPA
NAME	ORGANISATION
25.John Selby	
26.Needham family	
27.Marina Black	
28.Michael Clemitson	
29.Liezel Delport	Boschendal
30.Guy Musson	Saldanha Bay Oysters
31.Adrian Ceruti	Atlantic Yachting
32.Bev le Suer	South African Sailing
33.Michael Robinson	South African Sailing
34.John van der Vyver	Langebaan property owner
35.	Friday Island (PTY) LTD
36.	Race Director Langebaan Downwind Dash
37.	Langebaan Kitesurfing Guild
38.Mr Georg Agotnes	Southern Cross Salmon Farming (Pty) Ltd
39.Jennifer Kamerman	Save the Langebaan Lagoon Action Group
40.Inge Frost	Save the Langebaan Lagoon Action Group
41.Clifford Wright	Save the Langebaan Lagoon Action Group
42.Christo van Wyk	Saldanha Bay Water Quality Forum Trust
43.Andre Pretorius	People Against Aquaculture in Saldanha
44.Christina Hagen	BirdLife South Africa
45.DA Whitelaw	Cape Bird Club Conservation Committee
46.Keith Harrison	West Coast Bird Club
47.Deirdre Pretorius	West Coast Business Chamber
48.Elsa Wessels	Weskus On The Line
49.Yael Malgas	Weslander
50.Sue Reuter / Jessica du Toit	SRK

2.3 Letters sent to IAPs for comment request

Letters were sent by email to the list of identified stakeholders in Section 2. Letters of all comment periods, except the July comment period are included at the end of this section. Proof of the July letters were not available at the time of printing and will be submitted with the final report

Hard copies of reports were sent to (December 2016, March 2017 comment periods):

Department of Environmental Affairs and Development Planning	Safwaan Abrahams / Taryn Dreyer
Department of Environmental Affairs and Development Planning	Ieptieshaam Bekko
Saldanha Bay Municipality	Nazeema Duarte
Department of Agriculture Forestry and Fisheries	Michelle Pretorius / Andrea Bernatzeder
Department of Environmental Affairs: Oceans and Coasts	Funanani Ditinti / Moses Ramakulukusha
Transnet National Ports Authority	Donovan Samuels / Ethel Coetzee
Saldanha Public Library	December and March
Langebaan public library	July

3. Notices put up in public places

3.1 Notice of December 2016

**BASIC ASSESSMENT FOR ENVIRONMENTAL AUTHORISATION - PUBLIC PARTICIPATION PROCESS
MOLAPONG AQUACULTURE PROJECT, SALDANHA BAY
(PRE-APPLICATION PHASE)**

(DEADP) NOI REF # 16/3/3/6/7/1/F4/17/3124/16

Notice is hereby given in terms of the Environmental Impact Regulations as advertised in the Government Notice 982 of 4 December 2014 and as per the National Environmental Management Act, 1998 (Act No 107 of 1998).

Project Proposal and location:

The proposed project entails the installation of sea cages for farming finfish and long lines for mussels/sea weed covering approximately 28,5 ha within a sea space lease area of 55 ha, distributed between two sites, i.e. one near Jutten Island (expansion of existing 1ha lease area), and one in Big Bay North (new lease area) (refer to figure below). These locations are close to already allocated aquaculture areas, which are also outside major recreational areas / military training areas to provide for safer navigation for other water users. Alternatives are being considered.

Application for environmental authorisation to undertake the following:

Listing notice 1: (GN No. 983) activity 42, for the expansion of sea-based aquaculture activities for more than 50 t production output per year.

Opportunity to participate:

You are hereby invited to participate in the process by providing comment on the proposed project. Should you wish to register as a Stakeholder or have any further queries or comments, please contact Ecosense. The draft Basic Assessment Report will be available at the Saldanha Public Library from 21 December 2016. It can also be downloaded from the following link: <https://drive.google.com/open?id=0B0S5f5xTP1HHckM3dTNHZ1RjYlE> (email michelle@ecosense.co.za to forward you the link). You have the opportunity to participate in the process by providing comment until 6 February 2017 (30 days, with 15 December-5 January excluded from the reckoning of days). The application reference number must accompany any correspondence and comments.

**BASIESE ASSESERING VIR OMGEWINGSMAGTIGING - OPENBARE DEELNAME PROSES
MOLAPONG AKWAKULTUURPORJEK, SALDANHABAAI
(VOOR-AANSOEK FASE)**

(DEADP) NOI REF # 16/3/3/6/7/1/F4/17/3124/16

Kennis geskied hiermee van 'n proses van openbare deelname ingevolge die Wet op Nasionale Omgewingsbestuur (Wet nr. 107 avn 1998) en die Omgewingsimpakbepaling Regulasies van 2014, GN 982

Projekvoorstelling en Ligging:

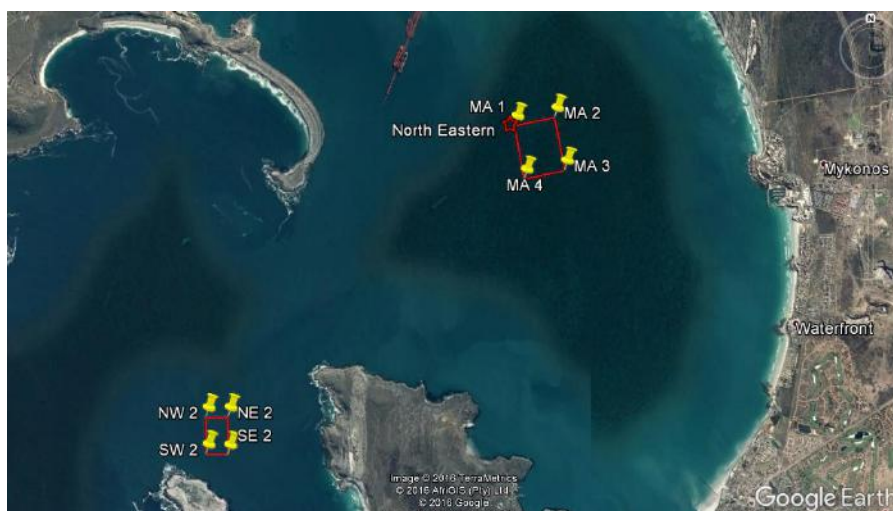
Die voorgestelde projek behels die installing van seehokke vir boer met vinvis en langlyne vir mossels en seewier wat ongeveer 28,5ha sal beslaan binne 'n totale seespasie huurarea van 55 ha. Dit sal versprei wees oor twee terreine, nl. een naby Jutten Eiland (uitbreiding van bestaande huurarea) en een in Big Bay noord (nuwe huurarea) (sien figuur onder). Hierdie liggings is naby reeds geallokeerde akwakultuurareas, maar ook buite hoof ontspannings- en militere opleidingsareas wat veiliger navigasie vir gebruikers sal bied. Alternatiewe word oorweeg.

'n Omgewingsmagtigingsaansoek word gedoen vir die volgende:

Lyskenningsgewing 1 (GN No. 983): aktiwiteit 42, vir uitbreiding van seegebaseerde akwakultuur met meer as 50 t produksieuitset per jaar.

Die publiek se betrokkenheid:

U is welkom om deel te neem aan die proses deur u kommentaar of insette te lewer. Indien u wens om as 'n belangeparty te registreer of indien u kommentaar wil lewer, kontak asseblief vir Ecosense. Die konsep Basiese Assesseringsverslag sal beskikbaar wees in hardekopie vanaf 21 Desember 2016 by die Saldanha Biblioteek. Dit kan egter intussen afgelaai word by die volgende skakel: <https://drive.google.com/open?id=0B0S5f5xTP1HHckM3dTNHZ1RjYlE> (epos michelle@ecosense.co.za om die skakel aan te stuur). U het geleentheid om kommentaar te lewer tot 6 Februarie 2017 (30 dae, met 15 Desember-5 Januarie uitgesluit). Meld asseblief die aansoekverwysingsnommer in alle korrespondensie.



Preferred sites for Molapong Aquaculture / Voorkeur terreine vir Molapong Akwakultuur

Contact details / Kontakbesonderhede: Kozette Myburgh, PO Box/Posbus 12697,

Die Boord, 7613, Tel: 021 886 4056, Fax/Faks: 086 547 4221,

Email/Epos: kozette@ecosense.co.za / mark@ecosense.co.za / michelle@ecosense.co.za





Figure 1: Notice at Saldanha public library, where a report was also made available



Figure 2: Notice at Benguela Fishing Shop in Saldanha



Figure 3: Charlie's Fish shop in Saldanha



Figure 4: Notice at Eigelaars Marine, Saldanha

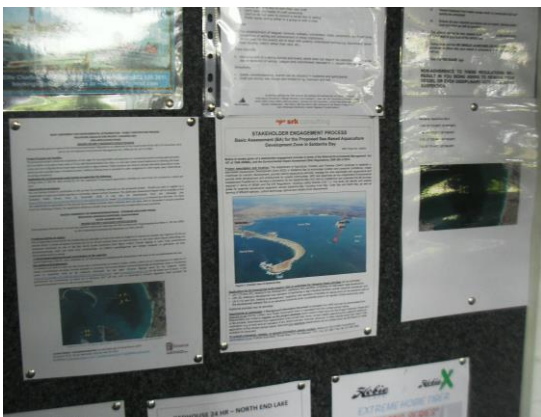


Figure 5: Notice at Langebaan Yacht club



Figure 6: Site visit with Dept of Environmental Affairs, Oceans and Coasts, 9 February 2017

3.2 Notices and News Paper advertisement - March 2017

**BASIC ASSESSMENT FOR ENVIRONMENTAL AUTHORISATION - PUBLIC PARTICIPATION PROCESS
MOLAPONG AQUACULTURE PROJECT, SALDANHA BAY
(DEADP) NOI REF # 16/3/3/1/F4/17/3014/17**

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Application for environmental authorisation to undertake the following:

Listing notice 1: (GNR983) activity 7,17,42&54; and Listing Notice 3(GNR985) activity 13&24 for the development and expansion of sea-based aquaculture activities for more than 50 t production output per year.

Opportunity to participate:

You are hereby invited to participate in the process by providing comment on the proposed project. Should you wish to register as a Stakeholder or have any further queries or comments, please contact Ecosense. The Basic Assessment Report will be available at the Saldanha Public Library from 20 March 2017. It can also be downloaded from the following link: <https://drive.google.com/open?id=0B0S5f5xTP1HHUlpUeFB3ZHlQZnc> (email michelle@ecosense.co.za to forward you the link). You have the opportunity to participate in the process by providing comment until 21 April 2017 (30 days, with public holidays excluded). The application reference number must accompany any correspondence and comments.

**BASIESE ASSESERING VIR OMGEWINGSMAGTIGING - OPENBARE DEELNAME PROSES
MOLAPONG AKWAKULTUURPORJEK, SALDANHABAAI
(DEADP) NOI REF # 16/3/3/1/F4/17/3014/17**

Kennis geskied hiermee van 'n proses van openbare deelname ingevolge die Wet op Nasionale Omgewingsbestuur (Wet nr. 107 avn 1998) en die Omgewingsimpakbepaling Regulasies van 2014, GN 982

Projekvoorstelling en Ligging:

Die voorgestelde projek behels die installering van seehokke vir boer met vinvis en langlyne vir mossels en seewier wat ongeveer 28,5ha sal beslaan binne 'n totale seespasie huurarea van 59 ha. Dit sal versprei wees oor twee terreine, nl. een naby Jutten Eiland (uitbreiding van bestaande huurarea) en een in Big Bay noord (nuwe huurarea). Hierdie liggings is naby reeds geallokeerde akwakultuurareas, maar ook buite hoof ontspannings- en militere opleidingsareas wat veiliger navigasie vir gebruikers sal bied. Alternatiewe word oorweeg.

'n Omgewingsmagtigingsaansoek word gedoen vir die volgende:

Lyskennisgewing 1 (GNR983): aktiwiteit 7,17,42&54; en Lyskennisgewing 3 (GNR985): aktiwiteit 13&24 vir vestiging en uitbreiding van seegebaseerde akwakultuur met meer as 50t produksieuitset per jaar.

Die publiek se betrokkenheid:

U is welkom om deel te neem aan die proses deur u kommentaar of insette te lewer. Indien u wens om as 'n belangeparty te registreer of indien u kommentaar wil lewer, kontak asseblief vir Ecosense. Die konsep Basiese Asseseringsverslag sal beskikbaar wees in hardekopie vanaf 20 Maart 2017 by die Saldanha Biblioteek. Dit kan egter intussen afgelaai word by die volgende skakel: <https://drive.google.com/open?id=0B0S5f5xTP1HHUlpUeFB3ZHlQZnc> (epos michelle@ecosense.co.za om die skakel aan te stuur). U het geleentheid om kommentaar te lewer tot 21 April 2017 (30 dae, publieke vakansiedae uitgesluit). Meld asseblief die aansoekverwysingsnommer in alle korrespondensie.



Preferred sites for Molapong Aquaculture / Voorkeur terreine vir Molapong Akwakultuur

Contact details / Kontakbesonderhede: Kozette Myburgh, PO Box/Posbus 12697, Die Boord, 7613,
Tel: 021 886 4056, Fax/Faks: 086 547 4221,
Email/Epos: kozette@ecosense.co.za / mark@ecosense.co.za / michelle@ecosense.co.za





Figure 7: Site notice in stipulated size according to the Regulations on a cage at the current experimental site, for water users to see. Note that it would not be possible to put up a site notice on the proposed site, as there are no structures to attach it to yet.



Figure 8: Notice at Charlies Fish Shop in Saldanha

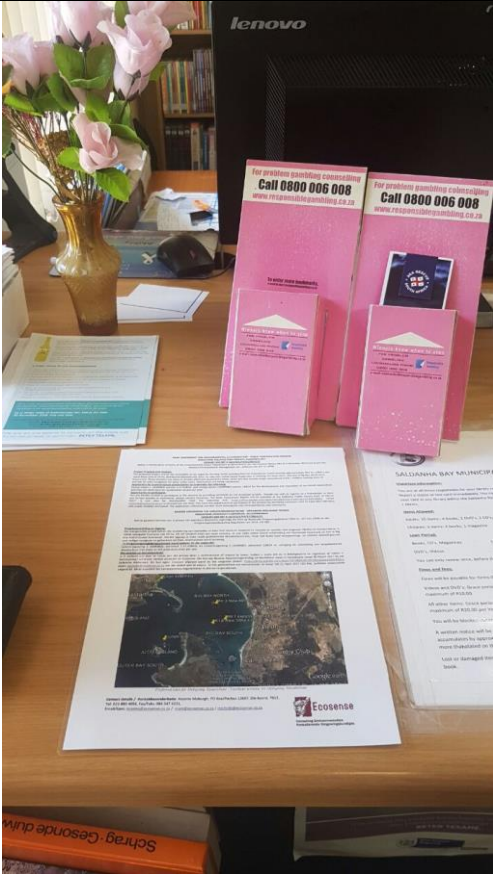


Figure 9: Notice at Saldanha Library



Figure 10: Report at Saldanha Library



Figure 11: Notice at Benguela Fishin Shop, Saldanha



Figure 12: Notice at Eigelaars Marine, Saldanha

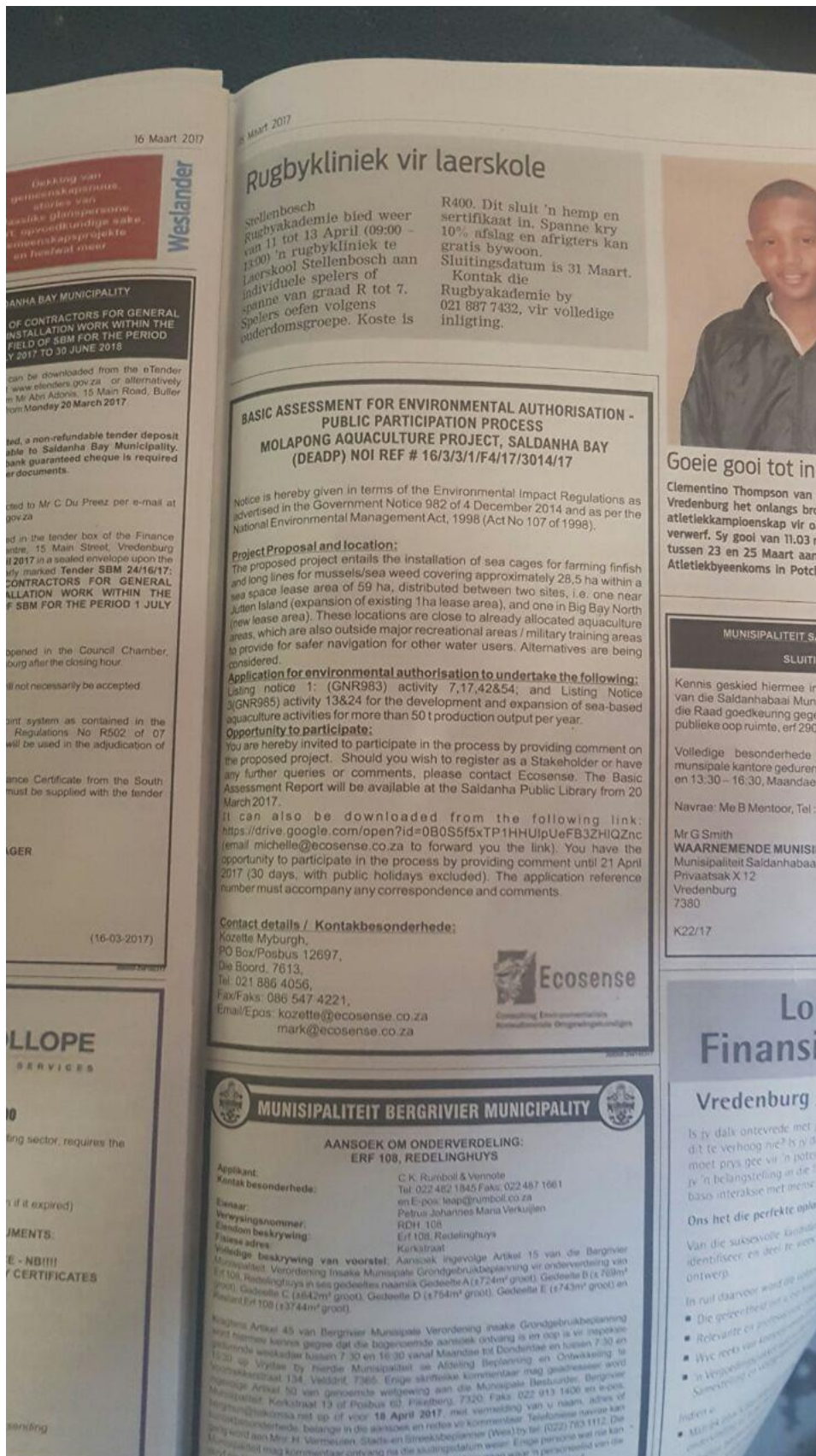


Figure 13: Advertisement in Weslander, 16 March 2017

4. Meetings held with Interested and affected parties as well as authorities

On 22 May 2017, a Focus group meeting was held in Saldanha at the Protea Hotel. The invite, as well as proceedings from the meeting follow in section 4.1 below.

On 9 June 2017, a meeting with the applicants from the ADZ, Molapong and Southern Cross Fish Farms were held to determine the status and way forward with the various applications, as these applications all fall within the same area with different competent authorities.

A follow-up meeting was held on 19 June with the EAPs of each of the applications to confirm the way forward.

Notes from the above meetings of 9 and 19 June were not made available by DAFF, who requested these meetings. The outcome of these meetings was that Molapong would complete their application to the DEADP. DEADP would defer the decision to the DEA, as the Molapong site falls within the ADZ area. The reason for Molapong completing their current application and not withdrawing to merge their application with the ADZ is two-fold:

1. Molapong would like to complete the public participation process in order to give comprehensive feedback to their IAPs on specific issues raised, as well as the expert focus group meeting, and further engagement with the SBWQFT and Birdlife SA.
2. In deferring their decision, it will be possible for the Provincial authority, DEADP to be an active role player in the monitoring committee that is being proposed to address the concerns of inadequate monitoring systems to check impacts.

On 27 June a meeting was held between Molapong and the Saldanha Bay Water Quality Forum Trust, to discuss monitoring results from the pilot project and the way forward in monitoring for the Molapong proposed commercial project. Notes from the meeting follow in section 4.2. Further email correspondence with Dr Clarke, relevant to the discussions, has also been included under section 4.2.

On 29 June a meeting was held between Molapong and SA Birdlife to discuss the concerns regarding the impact that the fish farm may have on bird life. Notes from the meeting follow in section 4.3.

4.1 Focus group with interested and affected organisations – 22 May 2017

4.1.1 Focus group notification:

Dear Registered Interested and Affected Party,

FOCUS GROUP MEETING

Proposed Molapong Aquaculture Project (DEADP) REF # 16/3/3/1/F4/17/3014/17
Monday 22 May 2017
8h45-12h00
Protea Hotel, Saldanha (51 Main Rd, Saldanha)

You are hereby invited to a focus group panel discussion meeting for the proposed Molapong Aquaculture project in Saldanha Bay as part of an ongoing public participation process under the NEMA EIA Regulations.

This focus group meeting is intended for organisations that have registered or raised comments for the Molapong project in the NEMA Environmental Authorisation Application Process. It will take the form of a facilitated expert panel discussion aimed at addressing or clarifying technical issues surrounding this aquaculture proposal and the main issues of concern that were raised.

The programme for the meeting is as follows:

8h45 – 9h10	Registration
9h10 – 9h15	Welcome and attendance
9h15 – 9h20	Overview, programme and protocol
9h20 – 9h50	Panel discussion 1 – water quality
9h50 – 10h10	Panel discussion 2 – disease and ecological / marine life impacts
10h10-10h30	Break
10h30-11h00	Panel discussion 3 – socio-economic
11h00-11h30	Panel discussion 4 – process and Public Participation
11h30-11h50	Other issues, general discussion and questions
11h50-12h00	Wrap up and way forward

We kindly request that you delegate one representative from your organisation/group to attend the meeting. Please RSVP with the name and contact details of the representative by Friday 12 May 2017, by responding to this email.

We value your participation in this process.

Kozette Myburgh




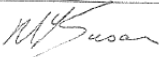
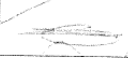




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Fax: 086 547 4221
Cell: 082 783 9860
Web: www.ecosense.co.za

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4.1.2 Attendance Register

	Name and Organisation	Contact Number	Contact Email	Signature
1	Abrahams, Safwaan (DEADP)	021 483 0780	Safwaan.Abrahams@westerncape.gov.za	
2	Bekko, leptieshaam (DEADP)	021 483 4527	leptieshaam.bekko@westerncape.gov.za	
3	Bernatzeder, Andrea (DAFF)	021 402 3067	andream@daff.gov.za	
4	Ceruti, Adrian (Atlantic Yachting)	022 772 0718	adrian@atlanticyachting.co.za	
5	Coetzee, Ethel (TNPA)	022 703 5452	Ethel.Coetzee@transnet.net	
6	Britz, Peter (Rhodes University)	046 603 8415	p.britz@ru.ac.za	
7	Christson, Kevin (DAFF)	021 430 7010	KevinCh@daff.gov.za	
8	Don, Ryan (Councillor)	022 714 1909	ryan.don@sbm.gov.za	
9	Duarte, Nazeema (SB Municipality)	022 703 4958	nazeema.duarte@sbm.gov.za	
10	Hagen, Christina (Birdlife SA)	083 301 8765	christina.hagen@birdlife.org.za	
11	Harrison, Keith (WC Bird Club)	022 713 3026	keithbharrison@lando.co.za	
12	Heinecken, Jeffrey (WC Business Chamber)		info@weskussakekamer.co.za	

	Name and Organisation	Contact Number	Contact Email	Signature
13	Kamerman, Jennifer (SLL)	083 408 6778	savelangebaanlagoon@gmail.com	
14	Kotze, Doretha (WC District Municipality)	022 433 8523	dkotze@wcdm.co.za	
15	Kruger, Andre (Councillor)		info@woh2o.com ; info@wowlangebaan.co.za	
16	La Grange, Lesa (SAHRA)	021 202 8658	llagrange@sahra.org.za	
17	Maclachlan, Andrew (SCSF)	083 626 6014	scopefull@gmail.com	
18	Malgas, Yael (Media24)	022 713 1251	Yael.malgas@media24.com	
19	Myburgh, Kozette (Ecosense)	082 783 9860	kozette@ecosense.co.za	
20	Nel, Pierre (SANParks)	022 772 2144	Pierre.nel@sanparks.org	
21	Pitcher, Grant (DAFF)	021 430 7015	GrantP@daff.gov.za	
22	Pretorius, Andre (PAAS)	084 470 3298	andre.praetor@gmail.com	
23	Probyn, Trevor (DAFF)	021 430 7014	TrevorP@daff.gov.za	
24	Pronk, Frank (Councillor Alternative)	022 714 3816	frank.pronk@sbm.gov.za	

	Name and Organisation	Contact Number	Contact Email	Signature
25	Ramakulukusha, Moses (DEA ICM)	021 819 2494	MRamakulukusha@environment.gov.za	
26	Resoort, Krijn (Molapong)	072 245 7605	krijn@molapong.co.za	
27	Sasman, Mark (Ecosense)	082 855 1720	mark@ecosense.co.za	
28	Semoli, Belemane (DAFF)	021 402 3534	belemanes@daff.gov.za	
29	Snijman, Phil (Independent Facilitator)	083 290 7073	psnijman@gmail.com	
30	Stander, Barend (Molapong)	082 782 7937	saidanha@molapong.co.za	
31	Van Wyk, Christo (SBWQFT)	022 714 3367	metsal@imagnet.co.za	
32	Vries, Stephanus T (Councillor)		sfvries@gmail.com	
33	Wessels, Elsa (Weskus on the line)	084 240 1540	ewes@mweb.co.za	
34	Colin Whitehead	082 439 7799	saswcchairman@sailing.org.za	
35	Whitelaw, D.A. (West Coast Bird Club)		davesue@mweb.co.za	
36	Wright, Clifford (SLL) Inge Frost	0823388950	clifford@pks.co.za inge@freecycle.co.za	

4.1.3 Proceedings

RECORD OF PROCEEDINGS OF A FOCUS GROUP MEETING¹
MOLAPONG AQUACULTURE BASIC ASSESSMENT APPLICATION
PROTEA HOTEL SALDANHA, WEST COAST
22 May 2017, 09:00

DISCUSSION POINTS	QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<p>Opening and Welcome</p> <p>Kozette Myburgh from Ecosense welcomed everybody and thanked them for making time available to attend the meeting. The focus group meeting forms part of the Basic assessment public participation process. Purpose of the meeting is to address the concerns raised by the stakeholders regarding the application of expanding the existing operations of Molapong Aquaculture in Saldanha Bay.</p> <p>The Basic assessment process steps were explained as well as the public participation steps undertaken to date:</p> <ul style="list-style-type: none"> • Draft BAR document was sent out to authorities for initial comment in September 2016. • A revised draft was sent out for public comment during December 2016 extended to February 2017 • An application was submitted beginning of March 2017 • Another draft was circulated and advertised for comment during March - April 2017 • The final report is to be submitted by 2 June and the response period will be 107 days. • After the decision has been taken, then the parties that are not satisfied with the decision can launch an appeal. <p>She explained the structure of the meeting. Four main general topics were identified as part of the public comments to date. The meeting is an opportunity for individual questions around these topics to the panel of experts:</p> <ul style="list-style-type: none"> • Water Quality • Disease and impacts on marine life • Socio-economic issues • Public Participation <p>She handed over to Phil Snijman as the Chairman / Facilitator of the Meeting. He introduced his background in environmental law and fishing sector and his role as the chairman/facilitator.</p>		

¹ The comments / questions / responses contained herein is not necessarily recorded *verbatim*, but has been represented as true to the original comment / question / response made as possible. The aim was to capture the issues raised and specific questions and responses relating to these issues.

DISCUSSION POINTS		QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<p>Introductions, Attendance and Apologies</p>	<p>Kammerman, Jennifer (SLL) Save Langebaan Lagoon Action group Ceruti, Adrian (Atlantic Yachting) Coetzee, Ethel (TNPA) From Transnet Kotze, Doretha (WC District Municipality) Maclachlan, Andrew (SCSF) Britz, Peter (Rhodes University) Chairman of the South African Aquaculture Association, professor at Rhodes university. Malgas, Yael (Media24) Myburgh, Kozette (Ecosense) Nel, Pierre (SANParks) Christson, Kevin (DAFF) Scientist Aquaculture Don, Ryan (Councillor) Heinecken, Jeffrey (WC Business Chamber) Harrison, Keith (WC Bird Club) Pitcher, Grant (DAFF) Research Aquaculture division Probyn, Trevor (DAFF) Resoort, Krijn (Molapong) Managing Director of Molapong Aquaculture Sasman, Mark (Ecosense) Semoli, Belemane (DAFF) Aquaculture Division Bernatzeder, Andrea (DAFF) Aquaculture Division Snijman, Phil (Environmental Law and Independent Facilitator) Stander, Barend (Molapong) Project Manager Van Wyk, Christo (SBWQFT)Saldanha Bay water quality forum. Frost, Inge (SLL) Save The Langebaan Lagoon action group.</p> <p>Apologies: Hagen, Christina BirdLife SA, Whitelaw, D.A West Coast Bird Club The Chairperson asked that stakeholders identify themselves when raising to speak, as this will assist the person writing the minutes.</p>	<p>It was requested that everyone introduce themselves.</p>	<p>Stakeholders present were given opportunity to introduce themselves.</p>
<p>Power point presentation by Barend Stander (Molapong Aquaculture Project Manager)</p>	<p>Barend Stander, the Project manager at Molapong Aquaculture gave a detailed presentation on how the Salmonid farm pilot phase operation looks, including pictures of the growth stages the trout and salmon go through before transfer of the fish to Saldanha Bay. An overview of the cages and navigational lights on the cages was given as well as an explanation on the legal requirements of navigational lights on structures within the commercial port of Saldanha due to shipping channels.</p>	<p>Jennifer Kamerman (SLL) asked about the mussel's retrieval and how this is done. She wanted to know if this done indiscriminately.</p>	<p>Barend Stander (Molapong): explained that the mussels in the video are biofouling that came off the ropes and that they are of they are the alien Mediterranean mussels. The farm retrieves these mussels by sending a diver down with a net to remove these so that these mussels do not accumulate below the cages.</p>

DISCUSSION POINTS	QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<p>An underwater video was shown of the benthos (bottom of the seafloor) underneath the current cages after a full production cycle. The video taken in January 2017 showed a small crayfish and some mussels that he suspects have come of the mooring lines on a sandy seafloor. A monitoring program (MOM system, international system used by Norway) is prescribed by DAFF, where sediment is sampled, REDOX readings are measured, very little impact can currently be seen compared to the baseline sites. Barend explained that a diver goes into the cages each day to remove any dead fish.</p> <p>The net is treated with an antifouling paint, this is done at a net making company in St Helena bay on shore. The net cleaning also takes place there on land. The copper based paint used to treat the nets is part of a monitoring program to assess the leaching rate of the copper. This is done by suspending oysters next to the cage and comparing the analyzed results with those with the results from the control site in Big bay.</p> <p>He also mentioned that the mussels spat will naturally settle on the anchor lines and as they grow are collected and given to the mussel farm.</p> <p>Stake holders were given an opportunity to ask questions and make comments regards the presentation.</p>	<p>Mark Sasman (Ecosense) asked where this biofouling by product is taken</p>	<p>Barend Stander (Molapong): answered that the mussels are taken to a sister company that is a mussel farm, which uses the mussels as spat on new production lines.</p>
	<p>Mark Sasman (Ecosense) asked if there have been any problems, have they picked up any leaching.</p>	<p>Barend Stander (Molapong): answered that there is leaching right next to the net, but no increase in copper levels at the control site, which was the main concern. Copper is not a heavy metal that is tested for regarding food safety, as opposed to lead and cadmium.</p>
	<p>Mark Sasman (Ecosense) asked for confirmation that all fish harvested are processed externally at existing processing facilities.</p>	<p>Barend Stander (Molapong): confirmed that fish are currently processed in Cape Town and/ or send directly to clients whole.</p>
	<p>Christo van Wyk (SBWQF): this project is a relative small application in a bigger picture, which will be discussed today. The problem lies within the context of the bigger application (ADZ).</p>	<p>The Chairman clarified that it's an important context, and asked for some comments within the ADZ context.</p> <p>Kozette Myburgh (Ecosense) indicated that most issues are indeed in relation to the bigger picture and the panelists will be discussing this.</p>
<p>Overview: Ecosense</p>	<p>Kozette Myburgh (Ecosense) explained again that the Molapong BAR process started in 2016, with a pre-application phase in order to have some additional time spend on interacting with stakeholders. The new legislation has shortened the actual period from start to finish down to three months, which forces the applicant to conduct a lot more pre-application consultation work to conduct proper consultation with interested and affected parties.</p> <p>In September 2016, a draft basic assessment report was sent out to the authorities for comments.</p> <p>This draft BAR was then changed to incorporate some of the suggestions made.</p> <p>A Pre- application draft BAR was send out to a list of identified ADZ affected and interested parties in December 2016, which was a list of over 240 individuals and organisations.</p> <p>The draft bar was advertised over the December/January holiday</p>	

DISCUSSION POINTS	QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<p>period in order to make people that stay primarily in Langebaan over the holiday period would also be informed and notified. The comment period ran from December to February, and the comments received were included into a second draft BAR document which was send out to all the original 240 parties on the list, as well as additional stakeholders that requested to be formally registered as affected and interested parties. Comments received during this second comment period are being incorporated into a third draft and the Ecosense team and the applicant decided in order to properly engage with the registered stakeholders to invite them for a focus group meeting in the form of this panel meeting. The idea from the project's point of view is to keep on engaging with the stakeholders, even when the project has received environmental authorisation. The project BAR is currently within the formal time frame period, which means that within 90 days the final BAR document needs to be submitted. The authorities then have 107 days to decide, after which Ecosense will inform the registered parties of the decision following which they have time to lodge an appeal if they so which to do.</p>		
<p>Panel discussions</p>	<p>The Facilitator explained that the focus group meeting will continue with the panel discussions on the main concerns raised in the draft BAR document. Approximately 20 minutes are set aside for questions on each topic session. Any items still outstanding after this time will be flagged and possibly addressed again at the end of the meeting.</p>	
<p>Discussion topic: Water quality</p>	<p>Kozette noted the main concerns raised by the affected parties:</p> <ul style="list-style-type: none"> • Dispersion of organic materials. • Monitoring and / or appropriate norms and standards and enforcement. • Benthic environment. • Impact on the Langebaan Lagoon. 	<p>Christo van Wyk (SBWQF): The manager of the water quality trust for the past 20 years. Sees huge gaps in the process. Disagrees with the notion that only the upper currents come into the bay. On four occasions during dredging in small bay, seabed growth was lost up in the lagoon. Sediment was taken up into the lagoon.</p> <p>Grant Pitcher (DAFF) responded that dredging obviously puts sediment into the surface layer, which would explain the incidents. He was not saying that there is no water exchange between the bay and the lagoon.</p>

DISCUSSION POINTS	QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<ul style="list-style-type: none"> • Flushing of the Lagoon. • Current movement within the system. <p>Trevor Probyn, Scientist at DAFF, explained the required process when engaging in finfish farming, the guidelines concerning fish farming and if the farm does not meet these they will have to cease farming. Monitoring and evaluation that will be done regularly by DAFF. The MOM system is used by DAFF for specific monitoring requirement by the farms. Some concerns have been raised on the impact on the upper water column, but these are strictly less than the impact on the bottom water column. He said flushing is important in this regard and this will disperse that waste underwater.</p>	<p>Christo van Wyk (SBWQF): The currents in the bay are strong which will take sediment into the lagoon. Does not agree with the view of the DAFF scientists and is of the opinion that the interaction between the lagoon and the bay has not been studied thoroughly.</p>	<p>Grant Pitcher (DAFF) said that their observation was that a lot of work has been done on Saldanha Bay in terms of research and recent publications and documents are a living proof of such information. He said two years ago there was a publication dealing with those aspects of the physical, chemical and biological environment in the bay through Oxygen nutrient sampling. The hydrodynamics of the Saldanha Bay are well understood. He said he is confident that the project won't negatively affect the Lagoon. Feaces from fish are dense and won't end up in the top water column. DAFF has issued a mariculture permit which specifies exactly what is expected in monitoring, and the permit is renewed annually based on compliance.</p>
<p>Grant Pitcher, scientist at DAFF said with regards to the impact on the Langebaan lagoon that there have been some studies done on the hydrodynamics of Saldanha Bay. Saldanha Bay is stratified for most of the year. It has a strong thermocline, which in effect creates two different water bodies. Typically wastes from a cage farm are fast sinking and will drop to the bottom, very little waste is transferred from the fish into the top water column. Due to the fact that the Langebaan lagoon is very shallow, only the top water column comes in and out with the tide and none of the bottom water body should mix with the Langebaan lagoon water. The exchange of the water between the Bay and the lagoon is therefore mainly of surface water. That means there will be relatively little enrichment into the lagoon from the fish farm.</p> <p>Prof Peter Britz from Rhodes University (RU) explained that when looking from an international perspective, cage farming is the standard for finfish farming. Since 1980's Norway's production has grown to almost a million tons and that of Chile to a couple of hundred thousand tons. The potential biological impacts from finfish farms are therefore well</p>	<p>Christo van Wyk (SBWQF): Who is going to pay for the monitoring, is the polluter going to pay for the monitoring?</p>	<p>Krijn Resoort (Molapong) responded on the Monitoring and evaluation question that was raised in general in the draft BAR comments as a concern. He explained that the project falls within the ADZ zone and as such is required to report to DAFF. On top of this, the project also intends to register with ASC, which is a WWF certification scheme for sustainable aquaculture. ASC aims for the highest standard on sustainable aquaculture through years of public participation they have created a standard called 5% standard for the aquaculture producers that wish be certified as sustainable aquaculture producers. The ASC certification has over 30 pages of auditable deliverables, which clearly state what is required in order to be ASC certified. All of the costs for monitoring and the audit itself are for the cost of the farm. The ASC standard is a positive way to create not only environmental awareness with the producers,</p>

DISCUSSION POINTS	QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<p>understood. As long as the governance and standards system implemented can be measured, it should be resilient and transparent with a staged production. The South African environment does differ from those conditions in other countries like Norway and Scotland because those are stiller waters with lower current speeds, which therefore put a lot of emphasis on benthos monitoring. The Norwegian fjords are also much deeper and colder and not nutrient rich, which means that there is not a lot of biological activity. However, the ecosystem on the West coast and the Saldanha bay in quite different. There is a lot more biological activity due to upwelling of nutrients and bigger biological turnover, which should make the Saldanha bay system more resilient than the other overseas systems, These overseas systems, however, are used for carrying capacity benchmarking, which may not be correct.</p>		<p>but also with the consumers. Consumers are willing to pay more for ASC certified products, which in a way pays for the additional environmental monitoring. It creates a win-win environment for all. Once the farm is registered with the ASC, all the data that is gathered is out in the public domain and the most important thing with the ASC is consultation with the stakeholders and local communities.</p>
	<p>Christo van Wyk (SBWQF): There is concern about the placement of farms near Jutten and taking a Nitrogen flux up into the lagoon. Are you determined that the bay can carry 5000 tons? There was a lot of desktop studies, but no site-specific monitoring done. Are you confident that the current will take the faeces of the fish farm out of the bay, that it won't end up in the lagoon?</p>	<p>Professor Britz (Rhodes University) responded that the water depth on the Norwegian fjords are much deeper about 20-30m, the project in the bay has about 5m under the cage. However, the international model takes this into account. (water depth, current speed). The Norwegian cages and biomass in them are much bigger as a result thereof, as opposed to the tiny cages of the proposed farm.</p>
	<p>Inge Frost (SLL) asked about the depths of water on the farms in other countries as compared to the Lagoon and what data do they have of other farms and where else in the world is the similar project done.</p>	<p>Krijn Resoort (Molapong) explained that they foresaw two years ago that eventually there was always going to be a discussion of the validity of models used to predict the possible impact of a fish farm on the bay environment Molapong therefore took a decision to do a trial project first to assess the direct impact on the environment and daily challenges and problems they may encounter when setting up</p>

DISCUSSION POINTS		QUESTIONS / COMMENTS	RESPONSES / COMMENTS
		<p>Jennifer Kamerman (SLL) feels that through the scale, the impact of the whole proposed ADZ may cause irreparable harm and damage.</p>	<p>a commercial fish farm in Saldanha bay. Although the trial shows very low direct environmental impact, Molapong is proposing to increase the production in a staggered way but monitored all the time. If the monitoring shows that there is an increase in the environmental impact the farm will have to change its operational procedures in order to bring the impact within the legal DAFF requirements.</p>
		<p>Christo van Wyk (SBWQFT): what are the critical limits by which DAFF will say, no more, close the project.</p>	<p>Trevor Probyn (DAFF): in the MOM system monitoring, mainly chemical levels are assessed. Mainly REDOX and PH. Scoresheets are used and conditions under the site are assessed on those. A decision on farms is based on that.</p> <p>Grant Pitcher (DAFF) clarified that with regard to the monitoring, this was actually specified in the permit conditions, which are annually reviewed and issued. Although the industry may end up paying for the monitoring, they are not autonomous. A good example is the current shellfish monitoring program, which is enforced very effectively and he sees no reason why the monitoring cannot be done effectively for this project.</p> <p>Andrea Bernatzeder (DAFF) explained that DAFF is not running any aquaculture projects themselves but they are managing the sector as a whole and the management the Saldanha Bay as a whole. DAFF have the best interest on the environment and that anything that has been put in can be removed if it shows potential risks following the proper channels of marine rights. DAFF is interested in multi trophic farming with some species taking out nutrients and others adding them to the water system. They look at the system holistically</p>

DISCUSSION POINTS		QUESTIONS / COMMENTS	RESPONSES / COMMENTS
			and would never allow one type of farming system to negatively influence another. Within general aquaculture, there is a direct overlap between the environment, the activity and the socio-economics. If you don't maintain your environment it will be to the detriment of the business and as such it's in the interest of all involved to look after that environment.
		Christo van Wyk (SBWQFT): There is a question about how many hectares of seafloor are going to be degraded, what about a bay wide environmental monitoring system.	Andrea Bernatzeder (DAFF) noted that there are currently no large fish farms in South Africa and very limited sites where fish farming can be potentially done. As such there is very little data that shows any negative impact. You could do models for the next 10 years, but until you have real data, you will always have to base these models on assumptions. A model is only as strong as the assumptions that are put in them. Saldanha bay water quality has been monitored by different parties over the past years. There is always the potential of environmental pollution when it comes to aquaculture but one must monitor and make decisions according to the real data. Regarding the point raised on best intentions by Jennifer Kameron (SLL), aquaculture is not a white elephant, if something goes in the water (infrastructure, cages/rafts) it can be removed. Sites can be fallowed and rehabilitated. If we come across through various things that this project is not sustainable in Saldanha Bay then it will be removed. So it's not something that is going to be out there for the next 20 years and cannot be removed. In terms of accountability, DAFF issues a marine right and permits, farms are monitored and environmental control officers that report on the projects. Growth of the industry will

DISCUSSION POINTS		QUESTIONS / COMMENTS	RESPONSES / COMMENTS
			happen over the next 10-20 years, which allows for enough monitoring before any possible degrading potentially takes place.
	The Facilitator hereby flagged water quality monitoring as an issue needing more addressing and moved onto the next topic.		
Disease and ecological impact	<p>The following concerns were raised on disease and ecological impact in the draft BAR document:</p> <ul style="list-style-type: none"> • Influence of Alien Disease, can it be brought into SA. • Bird life- entanglement /predator interactions • Escapes/how will this influence breeding with wild fish • Transmission of parasites <p>Mark Sasman (Ecosense) emphasized that these comments deal with the salmonid species for the Molapong project and that it does not cover the range of ADZ species.</p> <p>Kevin Christson (DAFF) talked on the possibility of a disease coming into the country with the imported eggs. He explained that the trout and salmon eggs get tested when leaving the country of origin and once they arrive in South Africa, they get tested again and placed under quarantine until the results are negative for OIE listed diseases typically those viral diseases associated with salmonids. Salt water is very good at removing parasites in fresh water fish and he thinks that the smoltification process where are transferred from fresh water to salt water in the cages will be healthy get rid of any possible parasites the fish may have. He states that he does not think that there is a risk of introduction alien diseases into the country by the project. Regarding the matter of disease/parasites transfer from the fish in the cages to the wild fish stock. In general, cage culture is considered an open culture system, so there is some exchange naturally between the</p>	<p>Keith Harrison (WC bird club): A question about the occurrence of soft fish flesh, is this something that still occurs in the industry?</p>	<p>Barend Stander (Molapong): no we have not experienced any soft fish.</p> <p>Krijn Resoort (Molapong): no knowledge of this occurring overseas at the moment.</p>
		<p>Keith Harrison (WC Bird Club) said that he was concerned about the impact that the cages will make on the birds during the breeding season in the north Bay and also at the Sadanha Bay. The Facilitator then asked to specifically address bird entanglement.</p>	<p>Barend Stander (Molapong): said there have been no incidents of birds getting tangled in the nets. No entanglements of predators such as seals or dolphins. The type of net used is called DYNEMA, which is strong and does not allow any predators to break into the cage net. At the moment, the bird interaction has been with some Kelp gulls and a few Hartlaub gulls that hang around the cages, waiting for a fish pellets to float outside the net.</p>
		<p>Inge Frost (SLL): During the recent Mykonos regatta, 3 yachts hit your test phase, did any fish escape and if yes, how were they recaptured?</p>	<p>Barend Stander (Molapong): There was no structural damage to the nets, there were no escapes, no fish died.</p> <p>Krijn Resoort (Molapong) explained that during their trials, concerned parties, especially the yachting industry has expressed concern about the position of the current trial site. As such the preferred expansion site in the BAR document was the 40 hectare site near the Iron ore jetty, which is situated furthest away from the yachting sites at Mykonos as well as the Langebaan lagoon.</p>

DISCUSSION POINTS	QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<p>fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project farms salmonids and there are no naturally occurring salmonids in the bay.</p> <p>He added that there are no realistic risks and no chance of transfer of the usual external parasites such as Salmon sealice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages. They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation inventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process, will mean that there is a low risk.</p> <p>The birds concern needs to be addressed by a specialist someone who would give advice on the birds around Saldanha Bay.</p> <p>Barend Stander said that over the past years he has managed two pilot projects, North Bay and the Molapong Pilot project. There have been zero entanglement of birds, zero entanglement of predators. One interaction with a predator, which was at the North Bay site.</p>	<p>Mark Sasman (Ecosense) asked what the interaction with the predator was.</p>	<p>Barend Stander (Molapong) answered that it was a seal during the daily mort removal in a cage. Barend picked up a dead fish from the net bottom and a seal tried to grab it from the outside of the net. The seal was unsuccessful due to the fact that the net material used is a Dynema fibre, which is extremely strong.</p>
	<p>Keith Harrison (WC bird club) Two important items. Your video showed the small cray fish below the nets, they are important feed source for the Banked Cormorant. This is doing very poorly at the moment. The other point is that Cape cormorant, it has at the end of the breeding season an epicentre of all the Cape Cormorants of the Benguela system come to. This year, six weeks ago, there were about 250,000 of them. They hunt by driving the little fish into a bait ball. I have watched it several times from the shore, watching them. They will be crashing straight into your nets. That is not in your basic assessment.</p> <p>Mark Sasman (Ecosense): Please identify that area.</p> <p>Keith Harrison (WC bird club): North Bay and Big Bay. It's the whole area. They go up the lagoon. It's like a black cloud.</p>	<p>Barend Stander (Molapong): We do see those feeding frenzies very often, we have not seen one at the cage site ourselves. If they did crash into the cages, then obviously, the bird netting did work well excluding them. We did not find any injured or entangled bird around the cage structures.</p>
	<p>Jennifer Kamerman (SLL): the positioning of your trial. What was the determining factor of that?</p> <p>Jennifer Kamerman (SLL) Sorry Barend, I asked that question in particular, in relation to the birding feeding patterns. Is the trial position in the area where massive flocks are flying, as you are wanting to expand your trial?</p> <p>Jennifer Kamerman (SLL) so the answer is that whilst the proposed area might be less sensitive with regards to yachting, it could me more deleterious to the bird life.</p>	<p>Barend Stander (Molapong): The first trial (SCC) was in North bay, which is close to the upwell center of Cape columbine. We did oxygen readings prior to the trial and then saw the upwell center move into the North Bay area, which is water which is oxygen depleted, and you cannot farm fish in that. So that site was decommissioned because of this, the risk of fish dying was too big. So the second trial (Molapong) was moved inside the bay, further away from the upwelling center and</p>

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			<p>continental shelf. The interaction in the bay between the wind, current and upwelling mixes the water. The current site is depth related, deeper areas in the bay were not available due to shipping lanes.</p> <p>Krijn Resoort (Molapong): Maybe just a confirmation on where the trial is and where we propose to expand. The current site is relatively close to the Langebaan lagoon. At the start of the BAR process there was quickly some negative perception towards that site, from the yachting industry that it was going to obstruct current yachting routes and access. The SA navy was negative about the location. Molapong then approached TNPA if there was a possibility to move the proposed expansion to a different area. In the Molapong BAR application, you are obliged to put in alternative sites. The one we prefer ourselves is the one in the ADZ, closest to the iron ore jetty.</p>
		<p>Mark Sasman (Ecosense): Is there a sensitivity map for birdlife?</p> <p>Jennifer Kamerman (SLL): That is why I am asking questions. We should have that information. Given that the area has an international reputation for birdlife.</p>	<p>Andrea Bernatzeder (DAFF) it would need to be raised in a formal comment to both the ADZ and the Molapong application as it was previously not raised or mentioned.</p>
<p>Socio-economic issues</p>	<p>The following concerns were raised with regards to the draft BAR process on Socio economics.</p> <ul style="list-style-type: none"> • What will the social economic benefits due to the project • The number of employment opportunities. • Will there be an influence on property value <p>Krijn Resoort (Molapong) gave an overview of Molapong Aquaculture (Pty) Ltd, which is an existing trout farming company. He explained that the regarding future employment opportunities, the BAR document clearly states what will be the growth on</p>	<p>Jennifer Kamerman (SLL): Would you be employing 70 permanent jobs? What sort of level of skills would they need?</p>	<p>Krijn Resoort (Molapong) the majority of jobs will be for young and unskilled, where the company will be teaching the basic farming skills. The company has access to SETA courses to upskill the staff.</p> <p>Andrea Bernatzeder (DAFF): to put things into the broader perspective, as with the bay wide EIA (ADZ). Mussel farming is a lot more labour intensive than finfish farming, the estimates from existing projects for the increase in jobs within the ADZ in total is 850</p>

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<p>employment in the next coming years. Currently the company employs during the pilot phase, 4 local full time employees. Once environmental Authorisation has been received, they are aiming to create about 70 permanent jobs over 5 years for people from the local communities.</p> <p>The Company has, to date, spend three million Rand on Opex and 2 million Rand on Capex. They have made a further commitment to a company in St Helena bay to build them a 2,5 million Rand workboat (fiberglass hull catamaran), which totals to a current financial commitment of roughly 8 million Rand to date. Total projected financial need for the project is budgeted on 40 million Rand, which will be sourced through internal intercompany loans through its shareholders, Viking Fishing and Viking Aquaculture. Molapong has a 25+ % direct BBEE shareholding and is a has a BEE certificated rated level 2. They are required by TNPA to remain at level 4 as a minimum</p> <p>The company is aware that the creation of 70 jobs within the current unemployment situation in Saldanha bay is not huge, but in their application they wanted to keep the job creation at sea separate from the employment opportunities on land through processing as this will be a different EIA process if they eventually decide to start a processing facility in Saldanha. The current model is for harvested fish to be packed on ice and transported to Cape Town, so that the project can focus on the farming side for now. At a later stage they may look at processing locally, which could employ up to 140 permanent jobs.</p> <p>The company currently employs 10 full time people to two dedicated hatcheries producing fish to go to sea, so the total job opportunities in total associated directly with the project would be about 220 at full scale production.</p> <p>Local suppliers and services are sourced as much as possible.</p>		<p>job opportunities. A study by Tonin pointed towards 2500 job opportunities within the same proposed ADZ, but including the land based jobs.</p>
	<p>Jennifer Kamerman (SLL): What would the employment breakdown be at year 5, full production?</p>	<p>Krijn Resoort (Molapong) A general manager, production managers for the Finfish, Mussels and Seaweed sections. The company looks at the potential of its staff and people and would assist in developing them to management levels as much as possible.</p>
	<p>Jennifer Kamerman (SLL): I don't have an answer because you don't have an answer for me. The issue of local procurement, are you applying any sort of BEE criteria to that?</p>	<p>Krijn Resoort (Molapong): Yes, that is part of our normal procurement process. You cannot be a level 2 BEE company and not look at procurement. Luckily the Saldanha project is part of the bigger company, so if local Saldanha companies would be lacking a required BEE status we could compensate that in the beginning a little with procurement from elsewhere, but yes ultimately BEE procurement locally would be important.</p>
	<p>Mark Sasman (Ecosense): To confirm a point, in addition to the 70 jobs created directly, you also have 10 related jobs elsewhere?</p>	<p>Krijn Resoort (Molapong) Yes.</p>
	<p>Jennifer Kamerman (SLL): of these 70 direct jobs, will you favour any people from Langebaan.</p>	<p>Krijn Resoort (Molapong): We will favour people from the wider local community, Saldanha, Langebaan, Vredenburg.</p>
	<p>Christo van Wyk (SBWQF): on the 3 million spend on Opex, how much of that was spent on environmental monitoring and health monitoring?</p>	<p>Krijn Resoort (Molapong): I would have to get back to you on that, I don't have that breakdown for you right now.</p>
<p>Kozette Myburgh (Ecosense): Doesn't the ASC standard also include a part on employment conditions and parameters?</p>	<p>Krijn Resoort(Molapong): Its does indeed. It deals with employment practices, how much overtime people work, ASC talks about a living wage, not a minimum wage.</p>	

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		Keith Harrison (WC bird club): Wants to know if the fish will be gutted in Saldanha.	Krijn Resoort (Molapong): No, strictly, no gutting on the cage (water), all fish will be transported on ice to Cape Town.
		Inge Frost (SLL): Will all your fish produced be exported? Will you be putting money back into the local community?	Krijn Resoort (Molapong): Most of the fish produced will be for local (South Africa) consumption. One of the reasons the company (Molapong Aquaculture) wants to expand its production into sea farming is that there are not enough local fresh water farm sites available to supply local demand for Trout and Salmon, which is about 4-5000 tons, which is currently imported from Chile, Scotland and Norway. The steady supply of fish from our project would enable our customers to grow their market with a steady price, as opposed to that of the imported product, most of which has variable spot prices. Regarding Community upliftment funding, we are looking at this, although we do have a commitment currently to our Staff trust and shareholders.
		Jennifer Kamerman (SLL): What sort of Social responsibility are you looking at?	Krijn Resoort (Molapong): We will have to look and see what is suitable either from a mentorship point of view, as we do for small BEE farm on the fresh water side or possibly infrastructure. We have not chosen a specific Social development project or way of how to do this yet. We do not want to raise any expectations within the local community and realise later that there is an appeal or the project cannot go ahead as the environmental authorisation has been denied. Krijn confirmed that their main shareholder, Viking Fishing does beneficiation through its staff trust, to areas from which their fishing company staff come.

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			<p>Andrea Bernatzeder (DAFF): There are a number of operation Phakisa projects which are located in remote areas, more so than Saldanha, what she has seen is that there is in general a lot of direct beneficiation through employment of people from the local community. In Hermanus and Gansbaai, the abalone farms do a lot of work on drug abuse and education, as their staff come from these communities. Two other farms have in partnership looked at setting up a local clinic for the community. So the social responsibility in general is addressed through specific identified needs in the area.</p>
		<p>Jennifer Kamerman (SLL): She is there to represent to Langebaan community and therefore wants to flag the transport cost to Saldanha, which would be an extra expense for people from Langebaan. Personally she would like to see DAFF make tangible CSI a permit condition locally. Beneficiation should be done locally, not at a location close to the shareholders.</p>	<p>Professor Peter Britz (Rhodes University): Aquaculture is a relative pioneer industry and it's actually pioneer farming and aquaculture is not an industry as such and also not a medium size company, but a start-up project. The strategy together with the government, is to find a diversity in this industry and bring new farmers from the community in it. However, at the moment you have to be a medium size enterprise at least to set up a value chain and CSI and have separate Hatchery and separate processing like the whole strategy you see with the mussel and oyster farmers and now with the trout farming.</p> <p>Mentoring local Entrepreneurs would be a powerful contribution that one could make to a local community. These are the people you can work together with, add value and supply the market with more fish.</p> <p>Andrea Bernatzeder (DAFF) said the farms have a distance apart from each other, and as such there is space to fish in between them. The aquaculture structures can act as FADS</p>
		<p>Christo van Wyk (SBWQF): please remember the transport cost for the people from Langebaan, as they are going to be most affected by your project. Have you taken into consideration the local small scale fishers that have fishing permits. Will this project and the bigger (ADZ) have a negative effect on them and will the projects reach out to those families that will lose their jobs?</p> <p>Mark Sasman (Ecosense): Why would they lose their jobs?</p> <p>Christo van Wyk (SBWQFT): The Area of 400 hectares would potentially displace these.</p>	

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			(Fish Aggregating Device Structures) and fishing can be possibly be improved. This needs to be investigated.
		Christo Van Wyk (SBWQF) asked if in future when DAFF issues out permits can they make it a permit condition that the aquaculture companies participate in the bay watch operations.	Belemane Semoli (DAFF): Good question, the environmental monitoring program should indeed include all industries holistically, including aquaculture. DAFF would have to be held accountable for the enforcement of the aquaculture part.
Process and public participation	<p>Kozette Myburgh (Ecosense) gave an overview of the public participation process followed during the current BAR application.</p> <ul style="list-style-type: none"> • Engagement after registration period with more than only those that formally registered • 3 comment periods (ongoing process) • Meeting with focus group • Advert in Weslander • Notices in frequented places <p>She specifically mentioned the holiday period over December/January, normally this period is excluded, but was included with an extended total time period, to make sure that the people on holiday in the area also had time to see the notices and capture that audience.</p> <p>The public process is ongoing and the purpose of the focus group meeting today was to have additional and specific interaction with the registered organisations that have given input into the draft BAR document to date. The questions and comments will be included into another round of comment. In terms of the regulatory requirements, the project has ticked all the required boxes. More can always be done, and the project is also thinking to have continuous engagement with stakeholders through a committee, especially since there are concerns regarding monitoring and enforcement, where the community can be a form of watchdog.</p>	<p>Jennifer Kamerman (SLL): More needs to be done to provide access or get attention from the affected parties within the community and this is with regards to advertising.</p> <p>Public participation should get more attention and this will add value to the aquaculture industry, it should not be a tick box kind of exercise. We need to educate and consult. It would also be appreciated if the community representatives reach out to the affected communities and have more visual information that is easier to understand. The picture that was used was very misleading in the report. The communication needs to be more accurate and better done. The first picture that was put on the ADZ report was very misleading and should be looked at in future. Not enough has been done, more needs to be done.</p> <p>The amount of technical data and documents within and submission are just ludicrous without additional time on an equal standing and feels railroaded.</p> <p>We are not saying that the public participation process was not legal, but it was inadequate.</p>	<p>Mark Sasman (Ecosense) explained the guidelines that they had to follow are dictated out of NEMA and their guidelines and that those were used as a legal requirement process that needs to be followed. It has been followed and exceeded i. The draft document was sent out to the authorities upfront with the hope of getting input into the possible legal issues of the application. The process thereafter has gone through three public participation phases, one of which was extended to the public holiday season to capture those visitors that are only there during the Festive season. Ecosense used the local newspaper and have invited two members of the press so that the message can get spread a little wider, in plain language and hopefully in an unbiased manner. The process is restricted by both budget and time process constraints. The process is not finished, it is continuing, there is scope to improve the transfer of information. As part of an ongoing process they have asked for a community participating information sharing committee. This should occur and can possibly be part of existing structures such as the Water quality forum. If there is a perception that you have</p>

DISCUSSION POINTS		QUESTIONS / COMMENTS	RESPONSES / COMMENTS
			<p>been railroaded, that has certainly not been the intention and is an erroneous assumption. Belemane Semoli (DAFF) said that more can always be done indeed and that proper consultation and information sharing is critical. He said that they should have had this meeting before as it has shown to be very helpful to the process, they can commit to the two things which are the establishment of the forum and that will be specific for aquaculture and the second one is that they will be part of the bigger forum. He said from DAFF side they want to make sure that the project is acceptable at all levels, environmentally, socially and economically.</p>
		<p>Inge Frost (SLL): requested inclusion of more visual information when communication goes out to the community and affected parties. The initial ADZ advert was only of the area of the inside bay, which she feels was misleading and the ADZ also includes other bay areas.</p> <p>She made a comment that was said earlier about the project not being successful and that Molapong will stop immediately should they see any environmental damage. She gave an example of a project that was launched few years back and was stopped but the results are still showing of the red sea weed in the Lagoon and other area. She said it very important that when you inform the public you also include the exit strategy should there be a need.</p>	<p>Andrea Bernatzeder (DAFF): Public consultation and media sharing of information is important, however she would like to flag that it's important that information is done responsibly. Some of the articles that she has seen include pictures of something completely different from what has been proposed. The reduction in the proposed size of the ADZ has not been correctly shared in the media. We need to work together to make sure that the correct information is shared out to Empower all stakeholders. There is a lot of media communication that is going out and one needs to be careful and maybe work together to make sure that the right information goes out there and people are informed and empowered.</p>
		<p>Jennifer Kamerman (SLL): Can you elaborate more on this committee?</p>	<p>Mark Sasman (Ecosense) indicated that such a structure has not been finalized, at the moment it's a recommendation. The project has not submitted its final BAR yet and will probably ask for a 50 Day extension to include additional public participation.</p>

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		<p>Christo van Wyk (SBWQF): His experience in public participation over the past 20 years has been that the law is adhered to, but as little as possible is tried to be done. He is not saying that this is what happening here with the Molapong BAR, he is concerned however about this project and it being part of the bigger ADZ application. He is worried that companies use the BAR process to create lots of smaller companies at production levels less than 50 tons. On the process side on the monitoring side, please DAFF, include existing committees for monitoring the different industries. Please think about this when you make recommendations towards a specific committee structure.</p>	<p>Kozette Myburgh (Ecosense): none of the projects try to manipulate the process by going through a separate BAR submission. Each individual project has to go through it, even housing developments in the area and the total sum of applications therefore is maybe a lot, but you cannot hold this against the individual projects. The shortened timeframes do make the process more difficult, consultants also struggle with this - it's a general problem. The way this problem has been addressed in this project is with the focus group meeting and by having productive discussions on a way forward.</p> <p>Mark Sasman (Ecosense): The ADZ BAR process started after the Molapong process had been initiated. The client had the choice to drop it, but the client/project did not know if the ADZ process was going to continue which has now actually jumped ahead of the Molapong project. The ADZ Final BAR was advertised yesterday. We are now trying to include relevant information from their project into the Molapong application. No one tried to manipulate the process as some have suggested.</p> <p>Andrea Bernatzeder (DAFF): From DAFF's perspective, they cannot stop people doing an EIA, some of these projects' EIA have been running for four years. They are trying to culminate all aquaculture projects into the ADZ. The intention is to manage the area as a zone, including monitoring. Existing industry will have to raise their game to fall in line with the ADZ requirements.</p>
		<p>Keith Harrison (WC bird club): blames the local newspaper for the small size of the BAR adverts. They are unreadable.</p>	<p>Mark Sasman (Ecosense): The size and structure of the adverts are stipulated by law.</p>

DISCUSSION POINTS		QUESTIONS / COMMENTS	RESPONSES / COMMENTS
Additional discussion on monitoring		Inge Frost (SLL): made a comment that was said earlier about the project not being successful and that Molapong will stop immediately should they see any environmental damage. She gave an example of a project that was launched few years back and was stopped but the results are still showing of the red sea weed in the Lagoon and other area. She said it very important that when you inform the public you also include the exit strategy should there be a need.	Phil Snijman (facilitator): this is always addressed in the EMP, construction as well as operational and decommissioning.
		Christo van Wyk (SBWQF): On the matter of the EMP who handles this?	Mark Sasman (Ecosense): The ADZ EMP goes to National, the Molapong BAR goes to provincial DEA&DP
		Christo van Zyl (SBWQF): in practical experience, only 4 % of their total budget comes from aquaculture, none from government at the moment, only legislation. What about the impact of the project on the wider Bay?	Grant Pitcher (DAFF): there is currently extensive bi-valve monitoring done, that information is available, free of charge. There seems to be a lack of communication between the parties, which needs to be addressed. DAFF has put a lot of resources into monitoring the Saldanha Bay
		Christo van Wyk (SBWQF): I think the current inter-governmental task team (IGT) would be a good vehicle for this.	Belemani Semoli (DAFF): There should possibly be a memorandum of understanding between all stakeholders involved, DEA, DAFF, communities and industry holistically so that you don't put specific pressure onto one stakeholder only. Regardless of the ADZ EIA going through or not.
Closing comments	Belemane Semoli (DAFF): wants to get to a win-win situation, thinks that today's discussion has been of help, especially to himself. The information he previously saw on Facebook have maybe been distorted. He wants to assure all from DAFF's side that they make sure that projects are responsible as they will be part of the local day to day environment. They can commit to the establishment of a specific aquaculture forum. Secondly, the part of the wider bay monitoring part and are open to ongoing discussions on matters that may need to be addressed one on one. Mark Sasman (Ecosense) thanked everyone for making time and assured the panel to form a forum and that the recommendations		

DISCUSSION POINTS	QUESTIONS / COMMENTS	RESPONSES / COMMENTS
<p>shared at this meeting did not cause conflict with each other. Prof Peter Britz said that he is very impressed with the level of engagement from the panel and stakeholders. The rational and valid comments really make a difference to the process. He saw democracy being exercised and the process that was followed was of high quality compared to other EIA processes he had attended. The Chairperson thanked all for attending and for their constructive participation.</p> <p>Meeting closed at 12:20</p>		

COMPILED BY **Chanelle Nxodo**

Edited by **Krijn Resoort, Kozette Myburgh**

DATE **23 May 2017**

4.2 Meeting with Saldanha Bay Water Quality Forum trust and Dr Barry Clarke (Anchor Environmental) – 27 June 2017

a. Email correspondence following the meeting (meeting notes included last)

From: Christo [<mailto:metsal@imagnet.co.za>]
Sent: Monday, 17 July 2017 4:19 PM
To: 'Mark Sasman' <mark@ecosense.co.za>; 'Barry Clark' <barry@anchorenvironmental.co.za>; krijn@molapong.co.za
Cc: 'Kozette Myburgh' <kozette@ecosense.co.za>; Christo van Wyk <metsal@imagnet.co.za>
Subject: RE: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

Hi Mark

Sorry I am only replying today. Was out of office for some two weeks.

In short, my views in the Carte Blanche recordings was reduced to one or two points. I was interviewed for most of an hour. The nitrogen flux that was mentioned in the program was also mentioned together with the fear or uncertainty of diseases, antibiotics and organic load from fin fish and aquaculture farming. The focus of what I said was that there was no site specific studies done on the interactions between Big Bay and the lagoon (we do not understand this process fully), that the SBWQFT observed that dredging events had an negative effect (die off) on sea weed growth in the upper lagoon, hence the fear or uncertainty of the organic load and nitrogen and other pollutants' effect on the upper lagoon.

We are not at ease with the stratified water body postulate that is promulgated by DAFF, our monitoring tells us that for months the upper and lower water bodies does mix. With the right weather conditions (like the storm we had recently) it is possible (my opinion) that organic load (from fin fish and mussel and oyster farms) could be transferred into the upper lagoon. Organic build-up under the mussel rafts is a reality, some 500 hectares of mussels. You need to take note that organic material on the bottom will "catch" heavy metals and if this contaminated stuff enters lagoon it could pose a real threat.

Molopong is small in comparison with the bigger picture, the Carte Blanche program focussed on the bigger picture. I said a lot more than what was broadcasted, same with the way they expressed DAFF on the program. They made DAFF officials look bad, especially the part about tourism.

Your "write-up" of the meeting is representative of our discussions. I have no additions to made, except:

I need to mentioned that we did disagree about the point of what needs to be included in the EMPR or not. I fully understand why you want the "detail" of monitoring to be included in attachment documents and not the EMPR, this will make life easier in terms of public participation and expense. My concerns were the capacity of DAFF and the effective enforcement of these conditions, the department have not a good record in terms of capacity at ground level. We can only refer to the mussel watch program to proof our point. Looking after the interest of the environment, my opinion was that DEADP have a better legislative capacity record and hence my opinion that detail to be included in the EMPR operation phase. I leave this for the relevant departments to clear out and trust that the cheapest, most effective way of ensuring effective environmental monitoring and management principles would be cemented in the outcome, be it a EMPR or DAFF licence.

I trust that the SBWQFT would have a good working relationship with Molapong, similar to our relationship with the other aquaculture industries in the area.

Again sorry for only replying now.

Groete / Regards

Christo van Wyk

Saldanha Bay Water Quality Forum Trust

Telephone: (022) 714 3367
Cell: 082- 376 8529
E-mail: metsal@imagnet.co.za

From: Mark Sasman [<mailto:mark@ecosense.co.za>]
Sent: Tuesday, 11 July 2017 5:19 PM
To: 'Barry Clark'; krijn@molapong.co.za; 'Christo'
Cc: 'Kozette Myburgh'
Subject: RE: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

I've responded in your notes below

Mark Sasman (Pr.Sci.Nat.)

Proposed Molapong Aquaculture: Comments and Responses Report July 2017

From: Barry Clark [<mailto:barry@anchorenvironmental.co.za>]
Sent: Tuesday, 11 July 2017 12:23 PM
To: Mark Sasman <mark@ecosense.co.za>; krijn@molapong.co.za; Christo <metsal@imagnet.co.za>
Cc: Kozette Myburgh <kozette@ecosense.co.za>
Subject: RE: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

Hi Mark

My impression is that nutrient loading from Molapong on its own will not add significantly to the nutrient loading in the Bay. **[Mark Sasman]** Agreed The same cannot be said for DAFFs ADZ which is several orders of magnitude greater. **[Mark Sasman]** However the max finfish load is 5000tonnes ie 2 and a bit x Malopong at full swing the rest being shellfish which filter with no added nutrient load in the form of feed etc (or have I made an incorrect assumption here. Even the nutrient loading from the ADZ will be difficult to detect through site based monitoring against the high natural background variability (high variability on a weekly basis linked with upwelling events)**[Mark Sasman]** from what was explained and the background loads this makes sense. I would expect to see overall average nutrient levels in the Bay rise relative to historic levels though. **[Mark Sasman]** is this against the 5000 tonnes of finfish or will the increased filter feeders also add to an average increase I hope this makes sense?**[Mark Sasman]** me too Barry - Unless there is a big kill or die off I don't see a large load increase but.... Hence my confusion with the carte blanche take.

Regards
Barry

From: Mark Sasman [<mailto:mark@ecosense.co.za>]
Sent: 10 July 2017 06:26 PM
To: 'Barry Clark'; krijn@molapong.co.za; 'Christo'
Cc: 'Kozette Myburgh'
Subject: RE: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

Thanks for the feedback Barry - we will incorporate where it will add value to the monitoring plan as discussed.

Christo please feedback ASAP as I'm a little confused given what we saw on carte blanche and what we discussed in the meeting.

In our meeting discussions there was definitely consideration given to nutrient loading of the bay and possible intensive monitoring but this was considered by Barry to be of little use given the natural high nutrient upwelling that permeates the bay frequently and as such ANY nutrient loading by aquaculture given the scale proposed currently would be lost in these high background counts that are natural. Yet in the televised version aquaculture is purported to be the nutrient loader of some apparent significance.

As the EAP I need to try and filter out the issues in terms of significance and given our meeting discussions and commentary from other scientific based observations the nutrient load is of a medium to low rating and with mitigation low.

We have also concluded that Molapong would join in the monitoring efforts bay wide as well as meeting their own ASC / MOM obligations.

Look forward to your comments on the notes below and this issue. We are finalising our comment responses by close of this week.

regards

Mark Sasman (Pr.Sci.Nat.)

Ecosense CC

Office: +27 21 886 4056
Mobile: +27 82 855 1720

From: Barry Clark [<mailto:barry@anchorenvironmental.co.za>]
Sent: Monday, 10 July 2017 4:49 PM
To: krijn@molapong.co.za; Mark Sasman <mark@ecosense.co.za>; Christo <metsal@imagnet.co.za>
Cc: Kozette Myburgh <kozette@ecosense.co.za>
Subject: RE: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

Hi Krijn

I'm short – no. We are doing (or have done) some continuous monitoring of temperature, salinity, oxygen, pH, turbidity, waves etc. for the Trust but this is all straight forward and instrument based. As I mentioned to you in the meeting, I have very little faith in discrete measurements taken infrequently as it is very difficult to extract anything useful from these data. Weekly or monthly monitoring of nutrient levels in the water column that you are proposing to do will provide some useful information on the state of the environment in the bay but won't really help us to understand impacts of mariculture on the bay except possibly in the long term (as mariculture expands).

Something I neglected to mention in my previous email is that we intend to start monitoring redox potential at all the sediment monitoring sites in the bay from next year (this will tie in nicely with the MOM and ASC standards). Sediment sampling sites in the Bay are as per the map below. They are mostly focussed in Small Bay and around the ore terminal where most of the activity/discharges have been focussed to date but there is a clear need to increase coverage in Big Bay and in Outer Bay where significant increases in mariculture are anticipated



Regards
Barry

From: Krijn Resoort [mailto:krijn@molapong.co.za]
Sent: 10 July 2017 03:34 PM
To: 'Barry Clark'; 'Mark Sasman'; 'Christo'
Cc: 'Kozette Myburgh'
Subject: RE: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

Dear Barry,

Thank you for this method statement.

I will discuss it with the farm manager and if we have any questions get back to you.

Do you have method statement for the water quality sampling ?

Regards
Krijn Resoort

From: Barry Clark [mailto:barry@anchorenvironmental.co.za]
Sent: 10 July 2017 03:20 PM
To: Mark Sasman <mark@ecosense.co.za>; Christo <metsal@imagnet.co.za>

Cc: Kozette Myburgh <kozette@ecosense.co.za>; krijn@molapong.co.za

Subject: RE: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

Hi Mark

Thanks for that. Looks good to me.

Please see method statements used for collection and analysis of sediment and macrofauna samples for the annual State of the Bay monitoring below. It would be ideal if you could follow a similar protocol as this then the samples you collect will be directly comparable with those for the SOB programme. It may not be possible to subject samples you collect on a monthly basis to this level of analysis but it would certainly be good if you could do this at least on an annual basis (preferably in April) as this is when the State of the Bay surveys are conducted.

Regards

Barry

Sediment

Sediment samples are collected by divers by hand using 250 ml plastic sample jars. Samples are placed on ice immediately after collection and submitted to a SANAS accredited analytical laboratory. Standard geotechnical techniques (Test Reference: ASTM D 422 – 63 (1990), ASTM D854-58, TMH1 A2-A4 (1986) are used for granulometry analyses which involves dry sieving with 18 different sieve sizes (7500-75 µm). TOC and TON content are determined using an Elemental Analyser (MALS3.1 Vario Elementar ELiii Elemental Analyser).

Benthic macrofauna samples

Samples are collected using a diver-operated suction sampler, which samples an area of 0.08 m² to a depth of 30 cm and retains benthic macrofauna (>1 mm in size) in a 1 mm mesh sieve bag. Three samples are taken at each site and pooled, resulting in a total sampling surface area of 0.24 m² per site. Samples are stored in plastic bottles and preserved with 5% formalin. In the laboratory, samples are rinsed of formalin and stained with Rose Bengal to aid sorting of biological from non-biological matter. In the laboratory, samples are rinsed on a 1 mm sieve with fresh water to remove formalin. The samples are then hand sorted and all fauna removed and preserved in 1% phenoxetol (Ethyleneglycolmonophenyl ether) solution. Organisms are identified to the lowest possible taxonomic level possible using available taxonomic keys (e.g. Day 1967a, b, 1974, Griffiths 1976, Branch *et al.* 2005). The validity of each species was then checked on The World Register of Marine Species (WoRMS, www.marinespecies.org). Empty shells and decapitated polychaetes that cannot be identified properly are excluded. The abundance and biomass (grams, blotted wet mass to four decimal places) of each species is recorded for each sample.

From: Mark Sasman [mailto:mark@ecosense.co.za]

Sent: 10 July 2017 12:14 PM

To: Christo; 'Barry Clark'

Cc: 'Kozette Myburgh'; krijn@molapong.co.za; mark@ecosense.co.za

Subject: Notes from Saldanha Bay Water Quality Forum Trust discussion regarding Molapong BAR Application

Importance: High

Dear Christo and Barry

Thanks for a very constructive discussion opportunity recently– here are my notes – please feel free to edit, add comment etc. I've tried to keep it condensed and hope to have captured the salient points.

Saldanha Bay Water Quality Forum Trust (SBWOT) discussion meeting held at Anchor office at 10h00 on 27/6/2017

Ongoing PP focus group for BAR application

Present –

Barry Clark – Anchor Environmental

Christo van Wyk – SBWQT

Krijn Resoort - Malopong

Mark Sasman – Ecosense

Intended to clarify issues and concerns on water quality and monitoring aspects and to ensure mitigation management can benefit the Bay wide monitoring objectives. These are notes only and are not intended to reflect as minutes or detailed summaries from the discussion which covered a wide aspects of the area water quality and management issues.

This discussion is part of the ongoing public participation of the Molapong BAR process and specifically follows on from the Focus Group meeting discussions and comments raised.

- Ecosense reiterated that there is a firm recommendation that a forum be initiated to ensure all roll players are considered and contribute to the aquaculture industry within the Malopong application and noted that this was also the view of the ADZ application. The DAFF had committed to such also at the Focus Group PP meeting recently held and minuted as such.
- Molapong likewise is committed to ensure that water quality monitoring and operational practices will meet the DAFF MOM and aims to become ASC Standard accredited and would want their results to add value and feed into the overall bay monitoring efforts. SBWQT confirmed that the weekly water quality testing, as required by the ASC standard would in all likelihood not show up much useful information, due to the nitrogen influx into the bay as a result of the natural upwelling. Molapong stated that they were committed to getting ASC accredited and would therefore follow the ASC standard, even if the weekly water quality monitoring seemed excessive or not needed. In order to monitor benthos underneath the cages, Molapong committed to monthly sampling of the benthos through REDOX readings, as opposed to once a year sampling, as required by both DAFF and ASC.
- SBWQT encouraged Molapong to adopt their sampling procedure methodology in order to make results useful and comparable. Molapong in turn agreed to adopt such protocols where feasible and committed to becoming a full contributing Member of the SBWQT to ensure that co-operative and responsible management governance are met and enhanced. Membership application was discussed and the process would be triggered between the parties ASAP.
- The MOM and ASC requirements dictated certain parameters, frequency and methodology in water and benthic monitoring to achieve the ASC certification. Where there are SBWQT sampling needs that can benefit from such analysis processing and collection (lab kits, diver sample collections etc.) that this would be discussed & undertaken as part of their co-operative objectives as a SBWQT member. The details and programmes would be agreed and implemented via a series of Standard Operating Procedures (SOP) and or Method Statements (MSt) to ensure comparability / repeatability/ continuity in method and results is upheld.
- Water quality and ecological limits, flags and or ranges would likewise be detailed within the SOP and M/Statements to be agreed in conjunction with the relevant authorities and which could then be attached as specifications / requirements to rights licences which are renewed annually thus ensuring binding commitment.
- The objectives, outcomes and mechanisms will be contained in the EMPr documentation but any SOP and MSt detail will be considered and maintained as addendums to allow for adaption and management review against results and observations without triggering an Authorisation review as now required by NEMA requirements for any substantial changes.
- SBWQT expressed their concerns w.r.t. the ADZ application as to how to ensure that other industry producers and future concessionaires be bound to consider and contribute to such ecological health objectives with SBWQT. This would be taken up with the ADZ applicant and their EAP at a similar discussion meeting soon.
- The BAR and EMPr would reflect the discussion outcomes for further formal consideration by the parties and authorities.
- All present expressed satisfaction that the intent for co-operative engagement and commitment to share results and observations would add value into the monitoring of the bay and that data would be scientifically valuable and useful for the longer term benefit of all users.

regards

Mark Sasman (Pr.Sci.Nat.)



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Web: www.ecosense.co.za

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b. Email correspondence re SBWQFT membership, following the meeting of 27 June 2017

From: Christo [<mailto:metsal@imagnet.co.za>]
Sent: 17 July 2017 01:51 PM
To: krijn@molapong.co.za
Cc: 'Barry Clark' <barry@anchorenvironmental.co.za>; 'Mark Sasman' <mark@ecosense.co.za>
Subject: RE: SBWQFT membership

Sorry Krijn

Just arrived in office today and are trying to catch-up with backlog. Please feel free to confirm that Molapong are part of the SBWQFT, I will get the paperwork back to you at a later stage. Hope this mail is not too late.

Groete / Regards

Christo van Wyk

Saldanha Bay Water Quality Forum Trust

Telephone: (022) 714 3367

Cell: 082- 376 8529

E-mail: metsal@imagnet.co.za

From: Krijn Resoort [<mailto:krijn@molapong.co.za>]
Sent: Wednesday, 12 July 2017 9:45 AM
To: 'Christo'
Cc: 'Barry Clark'; 'Mark Sasman'
Subject: SBWQFT membership

Dear Christo,

We are in the process to finalize our BAR document.

I would like to include our membership of the SBWQFT into this document.

Can you please send me the application form as a matter of urgency please.

Regards

Krijn Resoort



<p>KRIJN RESOORT MOLAPONG AQUACULTURE MANAGING DIRECTOR</p> <p>krijn@molapong.co.za www.vikingaquaculture.co.za</p> <p>tel 028 312 1273 cell 072 245 7605 f a x 0 8 6 5 7 8 0 6 6 2</p> <p>still street, new harbour P.O BOX 705, hermanus 7200 VAT NO. 441 023 8903</p>	The logo for Molapong Aquaculture, featuring a blue square with a white fish icon and the text 'MOLAPONG aquaculture' in white capital letters.
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4.3 Meeting with BirdLife South Africa 30 June 2017

From: Christina Hagen [<mailto:christina.hagen@birdlife.org.za>]
Sent: 11 July 2017 03:09 PM
To: krijn@molapong.co.za
Cc: Ross Wanless <ross.wanless@birdlife.org.za>
Subject: Re: notes from our meeting on the 30th of June 2017- final draft- hopefully.

Hi Krijn

Just confirming that I'm happy with this version.

Thanks for sharing the data with us now. I'll take a look and let you know if I have any questions. I will keep it in house for now.

Thanks
Christina

On Tue, Jul 11, 2017 at 1:47 PM, Krijn Resoort <krijn@molapong.co.za> wrote:

Hi Christina,

Please find below the latest draft.

Hopefully it now covers everything we discussed.

Regards
Krijn Resoort

BirdLife South Africa **Discussion meeting held at BLSA office at 09h00 on 30/6/2017**

Ongoing PP focus group for BAR application

Present –
Dr Ross Wanless - BLSA
Christina Hagen - BLSA
Krijn Resoort - Molapong Aquaculture

Meeting Intended to meet up with BirdLife South Africa (BLSA) as a registered party to the proposed Molapong Aquaculture Saldanha project and to clarify issues and concerns raised on water quality and monitoring aspects and to ensure mitigation to prevent any impact of the birdlife in Saldanha bay and surrounds.

These are notes only and are not intended to reflect as minutes or detailed summaries from the discussion which covered a wide range of topics.

Krijn Resoort gave a short overview of the proposed Molapong project and explained that the current trial phase has been in place for the past 2 years without any bird entanglement or fatalities. As part of the ASC certification, birdlife around the farm needs to be identified and recorded. Bird fatalities will be recorded and bird netting on top of the cages will be of a small mesh size so that no birds can get entangled in the bird nets.

The project is aiming for ASC certification for its proposed commercial phase of the Saldanha farm, which is the aquaculture certification equivalent of the MSC certification for the fisheries industry.

The projects farm manager was previously stationed as a bird observer at Malgas island and is well trained in identifying different bird species.

Specific bird location concerns were not raised.

Organophosphates are not used to treat sealice infestation. The Daff specialist on diseases clearly stated during the focus group meeting that the sealice that has such a negative impact on salmon farming overseas is not present in South Africa.

The cages used during the trial phase have till now withstood the elements very well. A 30 year storm that went through the bay did not cause any structural damage to the cages.

The nets used are Dynema nets, which have a very high breaking strain and allow us to only use a single grow out net, without the use of a predator net.

The double bottom/false bottom net suggested in the King and Coho risk assessment is therefore not needed as the Dynema netting used can withstand a predator attack from below.

Predator attraction to the cage is minimized by the daily removal of mortalities by our divers.

Marine fouling rate is high in Saldanha bay, this is countered by the use of anti-fouling paint on the grow out nets. Nets are not cleaned in the water, but taken to land and cleaned there as per ASC requirements. The application of the anti-fouling paint on the clean nets is also done on land.

The feed used to feed the farmed fish is currently imported from Germany. This company has just recently launched a new feed that makes use of protein and fat which is produced from Algae. The feed is called neo green and contains no fish protein or fish oil. Molapong continues to work with a local feed company to move towards similar diets to reduce the need for imported goods. Feeding practices will be done in such a manner to optimize the feeding regime (Feed Conversion Ratio) and reduce the possibility of accumulation of waste feed below the cages.

Ross expressed that their main concerns in their submission had been addressed, mainly due to the fact that the company is aiming to produce an ASC certified product. BLSA has had a lot of practical experience with the MSC product certification of fisheries products and it supports this type of certification. Ross encouraged Molapong to make use of the ASC logo on its products once ASC certification had been gained.

Molapong offered their services in Saldanha to BLSA if and when they required them and offered to share data and observations gained on the farm and its surrounds

The sampling data gathered of the benthos below the cages during the trial period will be included as an annexure in the final BAR document.

Regards

Krijn Resoort

From: Christina Hagen [mailto:christina.hagen@birdlife.org.za]
Sent: 11 July 2017 12:14 PM
To: krijn@molapong.co.za
Cc: Ross Wanless <ross.wanless@birdlife.org.za>
Subject: Re: notes from our meeting on the 30th of June 2017- revised

Hi Krijn

Thanks for these notes. I agree that they capture our discussion. I just have a couple of things to add

Under the feed point, perhaps add that the feeding regime is optimised so that excess feed does not accumulate under the cages.

The other thing we briefly discussed was the data that you've collected during the pilot phase and whether/when that will be made available?

Thanks
Christina

Christina Hagen
Pamela Isdell Fellow of Penguin Conservation

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<http://www.birdlife.org.za>

Donations to BirdLife South Africa may contribute to your B-BBEE scorecard as we are fully SED compliant in terms of the B-BBEE Act. We are also a registered Public Benefit Organisation (No. 930004518) and authorised to issue 18A tax certificates where applicable.

Christina's work is supported by the African Penguin Patron: Pamela Isdell, Diemersfontein Wine Estate, and the Save Our Seabirds Fund.

On Tue, Jul 11, 2017 at 10:48 AM, Krijn Resoort <krijn@molapong.co.za> wrote:
Dear Ross,

Thank you once again for meeting with me at short notice on Friday the 30th of June.

Here are my notes, which I would like to include in our final BAR submission – please feel free to edit, add comment etc. I've tried to keep it condensed and hope to have captured our discussion correctly.

-

-

BirdLife South Africa
Discussion meeting held at BLSA office at 09h00 on 30/6/2017

Ongoing PP focus group for BAR application

Present –

Dr Ross Wanless - BLSA

Christina Hagen - BLSA

Krijn Resoort - Molapong Aquaculture

-

-

Meeting Intended to meet up with BirdLife South Africa (BLSA) as a registered party to the proposed Molapong Aquaculture Saldanha project and to clarify issues and concerns raised on water quality and monitoring aspects and to ensure mitigation to prevent any impact of the birdlife in Saldanha bay and surrounds.

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Specific bird location concerns were not raised.

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The cages used during the trial phase have till now withstood the elements very well. A 30 year storm that went through the bay did not cause any structural damage to the cages.

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Marine fouling rate is high in Saldanha bay, this is countered by the use of anti-fouling paint on the grow out nets. Nets are not cleaned in the water, but taken to land and cleaned there as per ASC requirements. The application of the anti-fouling paint on the clean nets is also done on land.

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- Molapong offered their services in Saldanha to BLSA if and when they required them and offered to share data and observations gained on the farm and its surrounds.

- Regards

- Krijn Resoort

- **From:** Krijn Resoort [mailto:krijn@molapong.co.za]

Sent: 11 July 2017 10:44 AM

To: 'Ross Wanless' <ross.wanless@birdlife.org.za>; 'Christina Hagen' <christina.hagen@birdlife.org.za>

Subject: RE: notes from our meeting on the 30th of June 2017

- Hi Ross,

- Thank you for the quick reply.

- I will change the name and send it out to you and Christina again.

- Regards

- Krijn

- **From:** Ross Wanless [mailto:ross.wanless@birdlife.org.za]

Sent: 11 July 2017 10:26 AM

To: krijn@molapong.co.za; Christina Hagen <christina.hagen@birdlife.org.za>

Subject: RE: notes from our meeting on the 30th of June 2017

- Hi Krijn

Thanks for this and for taking the time to meet with us. I'm happy with the notes below, but will ask Christina to all have a quick view of them. One thing that should please be changed. Our correct, full name is BirdLife South Africa (note capital L) and thereafter should be shortened to BLSA. Sorry, institutional stuff I have to stick to...

Cheers

Ross

5. Issues trail

This issues trail contains the comments as received in the various comment periods that were undertaken and the responses at the time. These responses were further informed by subsequent consultation with key stakeholders and authorities. Where new information was received in the time following up to the current time of the report, additional responses have been included as appropriate and indicated as such.

5.1 Comments received on draft pre-application BAR distributed to authorities during September 2016

Abbreviations:

ADZ	Aquaculture Development Zone	MOM	Modelling-On growing fish farms-Monitoring
BAR	Basic Assessment Report	MPA	Marine Protected Area
DAFF	Department of Agriculture, Forestry and Fisheries	NEMA	National Environmental Management Act
DEA	Department of Environmental Affairs	NEMBA	National Environmental Management Biodiversity Act
DEA&DP	Department of environmental Affairs and Development Planning	SAHRA	South African Heritage Resources Agency
EMPr	Environmental Management Programme	SBWQFT	Saldanha Bay Water Quality Forum Trust
IAP	Interested and Affected Party	SLL	Save the Langebaan Lagoon

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
1	Asanda Njombeni Director: DAFF Sustainable Aquaculture Management	26/09/2016	Officials from the DAFF (Branch Fisheries): Directorate: Sustainable Aquaculture Management: Sub-Directorate: Aquatic Animal Health and Environmental Interactions (AAHEI): Aquaculture Environmental Assessments have reviewed the draft Basic Assessment (BA) report with accompanying reports and would like to highlight the following: The DAFF have already had extensive engagements with Molapong regarding the Environmental Management Programme and the Monitoring Plan for the pilot scale project regarding the Marine Aquaculture Rights Application and so have a very clear idea of the project. However it is noted that in the BA report the Monitoring Plan has omitted to include the monitoring of copper for the use in the anti-fouling paint on the nets. A Copper monitoring plan was developed by Molapong in consultation with the DAFF and although this monitoring plan was for the pilot scale project it is recommended that this plan be revised to cater for a fully commercial scale project. The details of the plan can be discussed with the DAFF Aquaculture Scientists. The Monitoring plan currently only covers the pilot scale project and would need to be updated to accommodate for the commercial scale operation. This can again be discussed with the DAFF Aquaculture Scientists who assisted with the drafting of the current plan.	Ecosense	Molapong wishes to become ASC accredited. The Standard for Salmon includes strict parameters for copper monitoring, which will be implemented for the project. Please see EMPr Appendix 4 for the Standards, with reference to ASC Criterion 4.7 regarding non-therapeutic chemical inputs.
2.1	T Gawulekaya N Duarte Saldanha Bay	10/10/2016	1. This Basic Assessment is in conflict with the Record of Decision by the Department of Agriculture Forestry and Fisheries, in which it states that a basic assessment is not required unless	Ecosense	The basic assessment is not in conflict with any Record of decision by DAFF. The application is for expansion of production to 2000t, which

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	Municipality		there is expansion of production on the site by 50 tonnes per annum.		requires a basic assessment application. Additional response: Assuming that it is the Mariculture right RoD being referred to, it should be noted that the right will be amended as required, once the EA has been received.
2.2			2. Please advise if there would be a potential impact on the stumpnose population in the lagoon which is already under duress. The Saldanha Bay already has in excess of 60 alien species.	Ecosense	Molapong currently has a Marine Aquaculture Right for five species of salmonids i.e. Rainbow trout (<i>Oncorhynchus mykiss</i>), Atlantic salmon (<i>Salmo Salar</i>), Brown trout (<i>Salmo trutta</i>), King salmon (<i>Oncorhynchus tshawytscha</i>) and Coho salmon (<i>Oncorhynchus kisutch</i>). Risk assessments were completed for these. Since it is not possible to predict the impact of naturalised adult salmonoids on marine life, a sound management system, as indicated in the EMPr will be in place.
2.3			3. Whilst this is not a concern for this specific fish farm but as mentioned in this report, there are plans for the Aquaculture Development Zone of which this farm is included and the total impact of this zone is a concern.	Ecosense	Noted. People can register as IAP in this separate process
2.4			4. The applicant should ensure that the design and layout of the cages does not negatively impact other marine life.	Ecosense	Noted. See Specification 5.6.1 and 5.6.3 of OEMP, which deals with cage assembly and maintenance. The type and mesh sizes of netting chosen for use are also mitigation for marine life impact
2.5			5. No packaging waste material must be dumped at sea since this can have impact on the other species living in the marine environment.	Ecosense	Noted, please see Section 5.6.2 of the OEMP regarding housekeeping and waste management
2.6			6. Please advise what the feed will consist of?	Molapong	The feed Molapong will be using consist of the following: <ul style="list-style-type: none"> • Raw Materials • Wheat • Fishmeal • Poultry meal • Soya oilcake • MCP • Vit/min - premix • Techni-guard • Carophyll Pink (astaxanthin) • Carophyll red (canthaxanthin) • Lysine • Methionine • salt • mycotixin binder • Canola/sunflower/fish oil mix • Blood meal Feed will also conform to ASC standards for certification, see OEMP specification 5.6.11.
2.7			7. The report should also mention what would be the mitigation	Ecosense	Mussel and sea weed culture in close proximity to finfish cages

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			measures to reduce the wasted food and faecal material if it is found to have a negative impact on the state of the bay.		would serve as natural de-nitrification mitigation. Strict management practices and quality feed use to reduce impact (See OEMP specification 5.6.11).
3	S Abrahams DEA&DP Development Management Region1	08/12/16	<p>COMMENTS ON THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED MOLAPONG FINFISH CAGE CULTURE PROJECT, SALDANHA.</p> <p>The pre-application Basic Assessment Report ("BAR") dated September 2016 and received by this Department on 09 September 2016 and this Directorate's acknowledgement thereof dated 14 September 2016, refer.</p> <p>This Directorate apologises for the delay in the submission of comments on the BAR.</p>	Ecosense	Noted. Please note that the responses to your comments was not included in the pre-application BAR, but will be included in the Final BAR.
3.1.1			<p>1. Listed Activities</p> <p>1.1. You are hereby advised that in addition to Activity 42 of GN No. R. 983 of 04 December 2014, Activity 17 of GN No. R. 983 of 04 December 2014 will also be triggered by the proposed development. This determination is based on the fact that the development includes the development of sea-based cage culture on an additional site (Big Bay site 1) which is located approximately 3.5km from Langebaan.</p>	Ecosense	<p>Noted.</p> <p>The activities that have been included in the application are: Listing Notice 1: 7, 17, 42 and 54 Listing Notice 3: 13 and 24 We assume that you refer to Activity 17 (i)(f) for infrastructure covering more than 50m² in the sea.</p>
3.1.2			<p>1.2. This Directorate notes that the marine infrastructure includes the use of anchors to hold the proposed longlines in position. You are therefore required to confirm the applicability of Activity 19 of GN No. R. 983 of 04 December 2014.</p>	Ecosense	See response from DAFF below 14.1
3.2			<p>2. Activity Description</p> <p>The activity description must be amended to include that the proposed development entails the expansion of an existing sea-based cage culture facility at the Jutten Island site from 1ha to 15ha and the development of an additional sea-based cage culture facility at Big Bay site 1. The throughput capacity of the existing cage culture facility must be included in the activity description.</p>	Ecosense	Noted and changed accordingly
3.3			<p>3. Site Layout Plan</p> <p>The BAR must provide an indication of the area(s) to be used to assemble the cages for finfish. The location and footprint of these areas must be provided. Further, a site development plan of the possible sites to be used must be included in the BAR.</p>	Molapong	It is not possible to confirm the exact location of assembly areas. Sites for assembly of cages will be temporary with changing locations, which may even fall outside the Pepper Bay area. A management specification has been included specifically for cage assembly, which must apply to any site where cages are assembled. Standard practice is that the Port Captain monitors the site and clean-up after assembly. Currently sites within the Pepper Bay Industrial Area is being used, but in future other sites may also be considered and would be subject to best environmental management standards..
3.4.1			<p>4. Potential impacts</p> <p>4.1. The BAR indicates that specialist studies have been conducted to</p>	Ecosense	Correct.

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			address some of the potential impacts and as a source to determine mitigation.		
3.4.1.1			4.1.1. It is noted that a Biodiversity Risk Assessment was conducted for Coho Salmon and King Salmon. The Biodiversity Risk Assessment Reports, dated November 2014 and compiled by Anchor Environmental have been included in the BAR. However, it appears that these reports were compiled in order to inform the permit application in terms of Chapter 7 of the National Environmental Management: Biodiversity Act, 2004 ("NEMBA") and the Alien Invasive Species Regulations, 2014.	Ecosense	Correct. The studies have also been used as reference to inform the impact assessment for this application.
3.4.1.2			4.1.2. You are therefore required to include a Biodiversity Risk Assessment which was conducted to assess the potential impacts associated with the proposed sea-based cage culture development (as the development includes rainbow trout and Atlantic Salmon as well) in the BAR to be submitted as part of the application.	Ecosense, DAFF	As confirmed by DAFF (see point 14.2 below), the AIS listed species does not require a risk assessment for Rainbow trout and Atlantic Salmon.
3.4.2			4.2. The Directorate further notes that copies of the NEMBA permits obtained on 20 July 2015 for Coho Salmon and King Salmon at the Soetfontein farm hatchery in Ceres have been included in Appendix E of the BAR. It is further noted, that permits have not been obtained for Atlantic Salmon and Rainbow Trout.	Ecosense DAFF	As per DAFF's letter (see 14.2): Rainbow trout, <i>Oncorhynchus mykiss</i> and Atlantic Salmon, <i>Salmo salar</i> are not listed in the in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species Lists, 2016. List 7, Prohibited fresh-water fish: No. "72 <i>Oncorhynchus</i> species, <u>excluding</u> rainbow trout (<i>O. mykiss</i> (Walbaum, 1792)), Coho salmon (<i>O. kisutch</i> Walbaum, 1792)) and King Salmon (<i>O. tshawytscha</i>) (Walbaum, 1792))." Note also "102. <i>Salmo</i> species, excluding brown trout (<i>S. trutta Linnaeus</i> , 1758) and Atlantic salmon (<i>S. salar Linnaeus</i> , 1758) Section 66(2) of NEMBA states that: "Any person may carry out a restricted activity involving a specimen of an exempted alien species without a permit mentioned in section 65(1)." Therefore, on the list of Alien species, Brown trout and Atlantic salmon are excluded (see 102) as is Rainbow trout, Coho and King salmon (see 72)
3.4.2.1			4.2.1. You are required to confirm whether any additional permits in terms of Chapter 7 of the NEMBA and the Alien and Invasive Species Regulations, 2014 will be required for the proposed development. Please note that should any additional permits be required, proof of submission of the application(s) must be included in the BAR to be submitted as part of the application.	Molapong	No permit is required to keep or operate a fresh water trout farm, irrespective if broodstock or small fish is kept there. The small trout that is grown for transfer to salt water come from IMPORTED rainbow trout ova. In order to import these ova, an import permit from DAFF is required. The exporting country then signs off on the import permit and also sends with a disease free certificate for the ova. These two documents basically talk to each other, making sure that the health of the ova and the broodstock they came from, lives up to the requirements of the South African authorities (an example of such an import permit and disease free

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					<p>certificate attached in Appendix E of the BAR). In general, Molapong ONLY import trout ova from a trading partner AQUASEARCH from Denmark as we have a good relationship with them and are confident of their husbandry practices. Denmark has also some of the most stringent environmental laws in place for aquaculture, which gives us piece of mind when it comes to their products, as well as a good reference point for our own practices in South Africa.</p> <p>The King and Coho salmon ova come from Cananda. South Africa signed a specific health agreement with Cananda to allow for the import of these ova. These ova therefore also require an import permit from DAFF, as well as a specific import permit from DEA, due to the AIS lists (copies attached in Appendix E of the BAR). (NOTE on the list of Alien species, Brown trout and Atlantic salmon are excluded (see 102) as is Rainbow trout, Coho and King salmon (see 72))</p> <p>Additional response after March comment period: <i>these copies have since been removed as it caused confusion. They are not directly relevant to the sea cage proposal. They were only included to show examples of the intent regarding compliance with permit conditions, but has been removed from the BAR as it has caused confusion. Thank you for this observation.</i></p> <p><i>The marine right that was granted, as well as the relevant permit for mariculture has now been included in Appendix E to the BAR.</i></p> <p>A transport permit is given between existing farms by Cape Nature. Molapong is currently awaiting a new copy of such a permit from them. Any third party that is not a trout farm, needs to apply for a transport permit with Cape Nature and submit exactly where the live fish will be stocked.</p> <p>Additional response after March comment period: <i>the mariculture permit authorizes transport as well.</i></p>
3.4.3			4.3.Section 6 of the BAR must be amended once the potential marine impacts associated with the proposed development have been adequately assessed.	Ecosense	<p>It is assumed that you are referring to Section F of the BAR, which includes the following assessments of marine impacts:</p> <ul style="list-style-type: none"> • Disease • Pollution • Marine animals
3.5			5. Public Participation Process Please note that the proof of the Public Participation Process conducted must be included in the BAR to be submitted to the competent authority as part of the formal application.	Ecosense	Noted. A comments and responses report with proof of public participation will be updated in the final BAR. What has been done up to now was included in the pre-application BAR in Appendix F.
3.6			6. Declarations An originally signed declaration as completed by the Applicant,	Ecosense	Noted.

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			Environmental Assessment Practitioner ("EAP") and any specialists who have compiled any specialist reports as part of the EIA process must be submitted in the BAR to be submitted to the competent authority.		
3.7.1			7. General 7.1.Details of the EAP who prepared the report and the expertise of the EAP including a curriculum vitae must be included in the BAR and the Environmental Management Programme.	Ecosense	See page 2 of the BAR and 1.3 of the EMPr. CVs have also been included in Appendix J of the BAR.
3.7.2			7.2.Section 10 on page No. 18 of the BAR indicates that this Department is the administering authority for the NEMBA. You are hereby informed that the National Department of Environmental Affairs is the administering authority in this regard. Please note that an activity may not commence prior to an environmental authorisation being granted by the competent authority.	Ecosense	Noted. The National Department of Environmental Affairs was also given the opportunity to comment. A site visit was undertaken with them on 10 February 2017. The competent authority for the Molapong application is The DEA&DP.
3.8			The Department reserves the right to revise or withdraw comments or request further information based on any information received. Your interest in the future of our environment is greatly appreciated.	Ecosense	Noted.

5.2 Comments received on pre-application BAR, distributed to identified interested and affected parties during December2016-February2017

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
4	Adri La Meyer- DEA&DP	19/12/2016	Thank you for your e-mail. I note that a pre-application BAR was made available to authorities for comment. I assume you made the pre-application BAR available to our Directorate: Development Management? Could you please provide me with 1 x hard copy and 3 x CDs of the Draft BAR (marked for my attention)? I will then distribute the copies internally and collate the Department's response on the Draft BAR. Please note that I am on leave until 12/01/2017, but will be checking my e-mails (occasionally).	Ecosense	Noted as per your follow up email of 9 January 2017 (see point 5) that your directorate does not require further communication.
5	Adri La Meyer- DEA&DP	09/01/2017	I sincerely apologise for the confusion caused by my e-mail. I wrongly assumed that DEA was the competent authority for this application, but Alvan informed me that the Department is the CA (Safwaan Abrahams is the case officer). As such, the DDF need not be involved in the application at all and I do not require any further communication on this application. I apologise again for the inconvenience caused.	Ecosense	Noted.
6	Keagan-leigh Adriaanse DEA&DP	19/12/2016	Please note that I am not the case officer dealing with this case. It is Safwaan Abrahams.	Ecosense	Noted. A hard copy, as well as electronic copy for further distribution was sent to Safwaan Abrahams.

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			Note that a hard copy of the pre-application BAR must be submitted to this Directorate for comment. You are referred to this Department's circular on the submission of documents.		
7.1	John Selby	16/12/2016	My initial comment from scanning your document is that I see little reference to the on shore processing facility, its location, mode of operation, and its production of wastes and odours which are characteristic of fish factories. Do you have more details on this aspect of the project?	Ecosense Molapong	There is no on-shore processing facility proposed by the Molapong Project. Processing is therefore not part of this application as fish will be collected from the cages and taken to land. Processing will take place at a DAFF and NRCS registered processing facility.
7.2			My second comment relates to the water quality in the Bay. Currently there have been many comments about the discharge of raw sewage into the bay and the inability of the municipality to manage this issue. Added to this the possible addition of water contaminants from the Elandsfontein phosphate project would also need consideration.	Ecosense	These factors are outside the scope of this application. However, water quality monitoring is an important part of aquaculture projects, as the quality of the product relies on good water quality. Protocols for monitoring have been included in the EMPr.
8	Needham family	17/12/2016	We asked to be registered as Stakeholders in August, but we have obviously not been registered as we are not receiving correspondence. Please advise urgently!	Ecosense	We note that you received the information via another party, but as per our email response, you have been registered to receive further correspondence on the Molapong Project.
9	Lesla la Grange SAHRA	19/12/2016	I have recently had an application on our online platform, SAHRIS, for an aquaculture project in Saldanha and would like to confirm whether this is the same project. The SAHRIS case ID for the application I received is 10280. Please will you have a look at the case, and if it is the same application please upload the letter you sent as well as the report and appendices to SAHRIS. This will enable me to comment on the report and issue a response to your NID. If this is not the same case, you will need to create an application and upload the documents to a new case. Please contact me if you have any questions.	Ecosense	As per telephonic discussion with you, the Molapong project is an individual project within the proposed ADZ. The application has been uploaded under a new case as requested.
10	Guy Musson Saldanha Bay Oysters	20/12/2016	I would be grateful if you would please register me as an I&AP for the Molapong Aquaculture Project	Ecosense	Noted and registered, as confirmed by email to you.
11	Dean Impson Cape Nature	21/12/2016	We generally do not provide input on sea cage culture operations as this is the jurisdiction of DAFF and DEA: Oceans and Coasts. You didn't mention which species of finfish Molapong wants to culture?	Ecosense	As per my acknowledgement email and as stated in the section A (1) (b) of the report, Molapong currently has a Marine Aquaculture Right for five species of salmonids i.e. Rainbow trout (<i>Oncorhynchus mykiss</i>), Atlantic salmon (<i>Salmo Salar</i>), Brown trout (<i>Salmo trutta</i>), King salmon (<i>Oncorhynchus tshawytscha</i>) and Coho salmon (<i>Oncorhynchus kisutch</i>). Molapong is in the process of amending this Right to include Mediterranean mussels (<i>Mytilus galloprovincialis</i>), seaweed as well as Yellowtail (<i>Seriola lalandi</i>). Additional response after March comment period: Note that yellow tail is no longer considered and only salmonids will be farmed.
12	Kishan Sankar DAFF	22/12/2016	I have checked the AIS listed species and confirm that a risk assessment is not required for Rainbow trout and Atlantic Salmon. Listing Notice 1 activity 19 is also not applicable for your application. I have called DEA&DP to discuss these matters with the case officer, who is currently	Ecosense	Noted, thank you.

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			on leave until the 16 January 2017. There will be no action taken on the EIA until his return, I will therefore issue a letter to competent authority in January requesting a review of sections 1.2, 4.1.2 (and associated 4.2).		
13	Kishan Sankar DAFF	03/01/2017	The Applicant "Molapong Aquaculture" has requested the Operation Phakisa Delivery Unit review the DEA&DP letter issued to Mr Stander on the 6 December 2016. Please find the attached response, please contact me should there be any queries related to the letter. The original letter will be posted to the DEA&DP registry.	Ecosense	Noted and included under point 14 below, thank you.
14	Andrea Bernatzeder – Phakisa DAFF	03/01/2017	The Delivery Unit for Operation Phakisa: Aquaculture (DU) within the Department of Agriculture, Forestry and Fisheries (DAFF) herewith formally acknowledges Molapong Aquaculture project as part of the Operation Phakisa Aquaculture workstream. The Molapong Aquaculture project was accepted as one of the twenty-four catalyst projects during the Operation Phakisa Lab in Durban during July and August 2014. The DU recognises the contribution of the Molapong Aquaculture project to the realisation of the Aquaculture LAB aspirations.	Ecosense	Noted.
14.1			The Department of Agriculture Forestry and Fisheries (DAFF) has reviewed the letter with above mentioned reference number, issued to Mr Stander on the 8 December 2016. The DAFF requests DEA&DP to review the below listed provisions of the letter: 1.2 "This Directorate notes that the marine infrastructure includes the use of anchors to hold the proposed longlines in position. You are therefore required to confirm the applicability of Activity 19 of GN No. R. 983 of 04 December 2014." The in filling of 5 cubic meters in the previous iteration of the 2010 EIA Regulations Listing Notice 1, Activity 18 made specific reference to the sea. The word "sea" has been removed from the Listing Notice 1 Activity 19 (GN 983). The Department of Agriculture, Forestry and Fisheries is also undertaking an EIA of Saldanha bay and has confirmed the applicability of this provision of the listing notice with the Department of Environmental Affairs during the EIA process . The DAFF is therefore of the opinion that listed activity 19 of GN No. R. 983, is not applicable for this application.	Ecosense	We concur with the opinion of the DAFF that the activity is not applicable.
14.2			4.1.2 "You are required to include a Biodiversity Risk Assessment which was conducted to assess the potential impacts associated with the proposed sea-based cage culture development (as the development includes Rainbow Trout and Atlantic Salmon as well) in the BAR to be submitted as part of the application. " Rainbow trout, <i>Oncorhynchus mykiss</i> and Atlantic Salmon, <i>Salmo salar</i> are not listed in the in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species Lists, 2016. List 7, Prohibited fresh-water fish: No. "72 <i>Oncorhynchus</i> species, excluding rainbow trout (<i>O. mykiss</i>	Ecosense	We did not receive any further correspondence in this regard from the DEA&DP and therefore assume that a Biodiversity Risk assessment is not warranted in this particular case, seeing that none of the species proposed by Molapong is listed on the Invasive Species list.

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			<p>(Walbaum, 1792)), Coho salmon (<i>O. Kisutch</i> Walbaum,1792)) and King Salmon (<i>O. tshawytsha</i> (Walbaum, 1792)).”</p> <p>No." 102. Salmo Species, excluding brown trout (<i>S.trutta Linnaeus, 1758</i>) and Atlantic Salmon (<i>S. salar Linnaeus, 1758</i>) ”</p> <p>It must also be noted that currently Rainbow trout is being farmed in the bay by Molapong Aquaculture and previous trials have been conducted with Atlantic Salmon by Southern Atlantic Sea Farm.</p> <p>Based on the above the DAFF requests DEA&DP review the request for a Biodiversity Risk Assessment for Rainbow Trout and Atlantic Salmon to be included in the Basic Assessment Report as part of the application.</p>		
15	Taryn Dreyer DAFF	09/01/2017	Your correspondence is herewith acknowledged and noted. The Directorate will provide a formal response in due course.	Ecosense	Thank you. Comment was received on 6 February 2017, see point 17 below.
16	Michael Robinson / Beth le Suer South African Sailing	16/01/2017	SUBMISSION BY SOUTH AFRICAN SAILING WITH REGARD TO THE PROPOSED MOLAPONG AQUACULTURE PROJECT, SALDANHA BAY (DEA&DP) NOI REF # 16/3/3/6/7/1/F4/17/3124/16	Ecosense	Noted and registered as interested and affected party.
16.1			<p>INTRODUCTION:</p> <p>The mission of South African Sailing is the promotion of sailing for life, across all sailing disciplines for all South Africans.</p> <p>South African Sailing is the government legislated representative for the sport of sailing in South Africa. South African Sailing represents all disciplines of sailing, including Ocean Racing, Ocean Cruising, Dinghy and Catamaran Racing, Dinghy and Catamaran recreational sailing, Sailboarding and Kiteboarding. Because all of the above activities are practiced in Saldanha Bay, South African Sailing is a stakeholder as envisaged in the “Background Information Document” dated August 2016. Further, the government of South Africa, through the Department of Sport and Recreation (SRSA) and South African Sports Confederation and Olympic Committee (SASCOC) recognise only one federation to represent each sporting code in the country. South African Sailing (SAS) is the recognised National Federation representing the interests of sailing in all its forms in South Africa.</p> <p>South African Sailing (SAS), in terms of its Constitution, consists inter alia of affiliated clubs, being autonomous and properly constituted sailing or aquatic clubs whose constitutional objectives are compatible with the provisions of the SAS constitution, and who undertake to, and have complied with, the terms and conditions of the SAS constitution and bylaws.</p> <p>Clubs affiliated to SAS situated in the greater Saldanha Bay area are:-</p> <ol style="list-style-type: none"> 1. Saldanha Yacht Club - 220 members 2. Langebaan Yacht Club - 1500 members 3. Club Mykonos 	Ecosense	<p>We obtained your details from the ADZ stakeholder database, hence we notified you of the Molapong project, which is a separate application to the ADZ application.</p> <p>Thank you for the detailed information provided.</p>

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			<p>These clubs represent a total family membership of approximately 2720 families - effectively around 3550 individuals.</p> <p>South African Sailing is the authorising body for Sailing Schools in South Africa. The following Sailing Schools affiliated to South African Sailing operate in Saldanha Bay, and as such are also entitled to representation by South African Sailing:-</p> <ol style="list-style-type: none"> 1. Atlantic Yachting 2. Ocean Sailing Academy 3. Sail Due South 4. Yacht Master Ocean Services 5. Two Oceans Maritime 6. Ocean Star <p>By virtue of the above, South African Sailing, its affiliated clubs and individuals, as well as the affiliated sailing schools, are major players in the recreational use of the waters of Saldanha Bay, and as such, South African Sailing is justified in making this submission in its own right and on behalf of its affiliated bodies.</p> <p>South African sailing has a proud record of working with authorities in the most beneficial utilisation of the limited bodies of water in South Africa available for and suited to recreational water use, in general, and sailing in particular. The following are recorded :-</p> <ol style="list-style-type: none"> 1. The development and implementation of the CIWSP (Consolidated Inland Water Safety Programme). 2. The implementation of the Resource Management Plans on government controlled inland water bodies, including: <ol style="list-style-type: none"> a. Boskop Dam b. Theewaterskloof Dam c. Vaal Dam d. Midmar Dam 		
16.2			<p>DEVELOPMENT AND TRANSFORMATION</p> <p>South African Sailing has a proud record in the fields of development and transformation. SAS was one of the first members of SASCO to lodge and have accepted a Long Term Participant Development Programme (LTPD). Development has followed in terms of the basic guidelines contained therein.</p> <p>Key to meeting the requirements and growing numbers of sailors has been the development and upgrading of clubs and sailing schools for them to offer access to, and be attractive to potential sailors. Clubs have been actively encouraging new people to try the sport and go on to practice it as a lifelong activity in whichever of the many facets of sailing they choose. Clubs have also offered sailing to schools and universities through individual fleet racing, schools leagues, interschools and inter-</p>	Ecosense	Thank you for the detailed information provided.

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			<p>university team racing and match racing. Links have been strengthened between existing sailing schools and the clubs to ensure that all people who do courses at sailing schools will find a home in a club near to their home. SAS continues to grow sailing from the grass roots. One initiative undertaken, has been the training and employing of District Development Coordinators (DDCs) who will assist the growth and efficiency of SAS clubs and sailing schools at district level. They will also assist clubs in their day to day running, training, marketing and development.</p>		
16.3			<p>Having lodged its credentials, South African Sailing wishes to state its position in summary as follows:- 1. South African sailing and its constituents support the effective utilisation of South African water resources. This is especially true where (as is the case with properly conducted aquaculture), such utilisation will secure pollution free water for recreational users. This will need to be the case, where the products of the aquaculture have to be nurtured in clean, pollution free water to ensure marketability for public consumption. 2. Sailing activities are already well established in the area, and the demands in this market area are on the increase, and set to continue to grow, especially as the SAS transformation and development strategies introduce new candidates into the market 3. Sailing already has a substantial positive impact on the economy of the region, both in terms of direct impact, as well as in terms of tourism benefits.</p>	Ecosense	Your position is noted.
16.4.1			<p>THE ECONOMIC BENEFITS OF SAILING IN SALDANHA BAY The retention of suitable sailing waters in Saldanha Bay, would protect the following existing economic activities :- 1. Clubs and Marinas The availability of the sailing waters in Saldanha Bay are attractive to many sailors, the majority of which are not resident in the area. The following offer full time mooring and services as a result of the availability of the sailing waters available :- a. Club Mykonos 200 walk on moorings Slipway facilities Catering and victualling Chandlery Employee compliment 19 (Boat Yard 12 and Marina 7) b. YachtPort SA 20 walk on moorings Travel Lift / Slipway facilities Catering and victualling Chandlery Boat repair, annual maintenance of boats Employee compliment 7 - 12 c. Saldanha Bay Yacht Club 102 Swing moorings Slipway facilities Catering and victualling Employee compliment 4</p>	Ecosense	The economic benefits of sailing as stated are noted. Noted.

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
			<p>d. Langebaan Yacht Club 80 Swing moorings Slipway facilities Catering and victualling Chandlery Employee compliment 16</p>		
16.4.2			<p>2. Keel boat sailing schools The following sailing schools operate in Saldanha Bay, where the sheltered waters provide an excellent environment for sail training. These schools enjoy substantial support from international candidates. The following schools operate in the area:</p> <p>a. Atlantic Yachting 650 candidates per year 100 international candidates per year Employee compliment 13</p> <p>b. Ocean Sailing Academy 150 candidates per year 50 international candidates per year Employee compliment 7</p> <p>c. Sail Due South 300 candidates per year 150 international candidates per year Employee compliment 13</p> <p>d. Yacht Master Ocean Services 150 candidates per year 150 international candidates per year Employee compliment</p> <p>e. Two Oceans Maritime 300 candidates per year 100 international candidates per year Employee compliment 23</p> <p>f. Ocean Star 300 candidates per year 100 international candidates per year Employee compliment 23</p>	Ecosense	Noted.
16.4.3			<p>3. Kite Boarding and Wind Surfing Businesses and Schools The following businesses and sailing schools operate in Saldanha Bay and also offer accommodation inclusive of successful restaurants. The Schools run in conjunction with the Hotel and employ 2 - 3 employees out of season. In season, this number increases between 8 - 10 each, to accommodate international coaches. Course fees alone range from R3 500 per week, per course and excludes accommodation, meals, tourism activities etc :-</p> <p>a. Windtown 300 local as well as international candidates per year</p> <p>b. Kite Lab 200 local as well as international candidates per year</p> <p>c. Cape Sport Centre 200 local as well as international candidates per year</p> <p>d. Sirens (including Hobies) 200 local as well as international candidates per year</p>	Ecosense	Noted.

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
			e. Wind Chasers Bed & Breakfast (sailing community plus local guests) 200 local as well as international candidates per year Employee compliment 5 - 8 per season f. Wind Town Hotel (focused on accommodating sailors of all disciplines, world wide) 200 local as well as international candidates per year Employee compliment 5 - 8 per season		
16.4.4			4. Examples of formal competitive events held annually a. SAS WC Provincial Championships i. 300 competitors ii. Average spend per competitor R1 000 per person b. Hobie Champs (multihull) - Downward Dash i. 300 competitors ii. Average spend per competitor R1 500 per person c. Hobie Champs (multihull) - Triple Crown (3 visits per year) i. 100 competitors ii. Average spend per competitor R1 000 per person d. SAKA Downwind Dash (kite boarding) i. 300 competitors ii. Average spend per competitor R1 500 per person e. SAKA Closing Round (kite boarding) i. 100 competitors and family ii. Average spend per competitor R1 500 per person f. The WSA World, largest wind surfing, kite boarding and Hobie downwind event in the world, has been sailed on these waters for the past 10 years and attracts 300 - 400 competitors annually. i. 400 competitors ii. Average spend per competitor R1 500 per person g. Mykonos Regatta (keel and multihull) i. 450 competitors ii. 2 000 family members and spectators iii. Average spend per competitor R1500 per person 5. Informal or recreational sailing a. Catamaran and small sailboats i. Average: 50 persons per day ii. Spend: R 1000 per day (includes accommodation and food / restaurant and equipment hire) iii. Period : 6 months of the year (Oct - March) iv. Revenue : R 9 million a year b. Kiteboards and Windsurfers i. Average: 150 persons per day ii. Spend : R 1000 per day (includes accommodation and food / restaurant and equipment hire)	Ecosense	Noted.

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
			iii. Period : 6 months of the year (Oct - March) iv. Estimated Revenue : R 27 Million a year c. Keel boat cruising i. Average: 50 persons per day ii. Spend : R 1000 per day (includes accommodation and food / restaurant and equipment hire) iii. Period : 12 months of the year iv. Estimated Revenue : R 9 Million a year		
16.4.5			6. Langebaan CBD - Municipal Strategic Plan The Langebaan community benefit directly from the current usage of water space. The strategic plan for Langebaan, as per the diagram attached, will play an important role in extending the benefits to the local community derived from usage of the Saldanha Bay and Langebaan Lagoon waters. Without these waters being managed and shared effectively to the benefit of all parties, the strategic plan will certainly not be implemented. The investment in this plan is based on growing water sport activities in the area. The additional benefits to the local community will, therefore, be lost.	Ecosense	Noted.
16.5			From the above, it is clear that there are compelling reasons to protect this existing economic activity generated by sailing and dependant on the availability of sufficient and attractive water for the various disciplines to be accommodated. The information provided does not purport to be a definitive economic assessment. Rather the information and figures are informal estimates based on information gleaned during the preparation of this document. The figures are lodged as a justification for a formal economic assessment to be undertaken, and as an encouragement to properly evaluate the existing economic benefits of maintaining suitable sailing waters in Saldanha Bay, and establish the aqua culture projects in such a way as to protect the existing income generators.	Ecosense	Noted.
16.6			CONCLUSION The contention of South African Sailing is that the proposed Molapong Aquaculture Project in Saldanha Bay should be encouraged, for the obvious benefits that can arise. South African sailing contends that this should be done within parameters that protect the existing economic benefits that derive from an active and growing sailing industry, which is already producing benefits. The benefits of the Sailing Based industry are not only in keeping with the concept of utilisation of water based resources, but are already happening in the interests of the local community. Every effort should be made to maintain and foster the Sailing Based industry that already exists.	Ecosense	Your support for the proposed Molapong project, provided that it does not compromise existing economic benefits that derive from an active and growing sailing industry is noted.

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
17.1	Mr Georg Agotnes Southern Cross Salmon Farming (Pty) Ltd	11/01/2017	With reference to your letter dated 15 December 2016, SOUTHERN CROSS SALMON FARMING (PTY) LTD would like to register as an official stakeholder and as an entity we would like to make use of the opportunity to participate formally in the basic assessment process.	Ecosense	You have been registered as a stakeholder.
17.2			Southern Cross Salmon Farming (Pty) Ltd, is currently an active participant in efforts to establish a viable and sustainable Aquaculture Industry in South Africa. The company therefore supports any initiative that will contribute to this objective.	Ecosense	Your support for initiatives that will contribute to the objective of a viable and sustainable Aquaculture Industry in South Africa is noted.
17.3			SCSF (Pty) Ltd is the long term holder of off shore leasing right for 10 hectares of Sea Space outside Saldahna, adjacent Jutten Island granted by Transnet. The company is currently seeking environmental authorization from the Department of Environmental Affairs (DEA), for an off shore net cage farm, Ref 14/12/16/3/3/2/747. Planning for the project implementation is at an advanced stage.	Ecosense	Noted, as also indicated on the draft lease map, Appendix B to the Basic Assessment Report. Currently Molapong has a 1ha allocation in proximity of your site, which is proposed to be expanded northwards and not towards your current lease area.
17.4			In our view the key element of the future development of a sustainable industry is an effective and stable regulatory regime protective of the interests of all stakeholders and the natural environment. In the absence of a local regulatory regime SCSF (Pty) Ltd has committed to compliance with international accepted quality and environmental management standards for aquaculture which govern the management of Aquaculture in Northern Europe and Norway in particular, at least specifically NS 9415. These standards form the basis of management regimes in other parts of the world.	Ecosense Molapong	Agreed. Similarly, Molapong will also adopt international ASC standards.
17.5			These international standards are applicable to inter alia of at least, site location, daily operations infrastructure design, environmental management systems (including water quality and pollution control). Strict compliance with these internationally standards is the essential minimum required to secure the confidence competent financiers and insurers of industrial scale Aquaculture and maintain the high quality of the natural environment which is essential to commercially and environmentally sustainable operations.	Ecosense Molapong	Agreed.
17.6			Essential compliance with international standards was a critical factor in SCSF (Pty) Ltd site selection and resulted in a lease agreement with Transnet following assurances from the Port Manager (Mr. Willem Roux) that no additional leases would be granted in close proximity.	Ecosense	Transnet did not indicate that no additional leases in this area could be granted. As per draft lease plan included in Appendix B, they are proposing to allocate approximately 14ha extending north and westwards from Molapong's current allocated lease site.
17.7			If this situation no longer prevails we believe that any future decision to permit an extension of net cage farming beyond the current SCSF proposed site must be predicated on a scientific evaluation of the minimum distances between individual site locations. Failure to adhere to this basic provision of the international standards will serve to undermine the integrity of individual net cage farming operations where	Ecosense Molapong	The information forwarded to support your comment includes specialist opinion, Norwegian Standards and a Canadian study. The Norwegian Standards document provided (NS9415.E) does not stipulate minimum distances between fish farms. The Specialist opinion from Dr Anna Mouton recommends 10km, but the whole bay at its widest point is just over 10km wide. It

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			any negative impacts arising from one farm will contaminate adjacent farms. The effective and essential monitoring of quality and environmental management systems will be impossible. This situation will have disastrous consequences, both environmental and financial, to individual operators and jeopardize a sustainable future aquaculture industry in Saldanha Bay.		would therefore be impossible to space farms 10km's apart. The study conducted to evaluate site following, year class separation and distances between sites for fish health purposes on Atlantic salmon farms (Steward, 1998), states that the data illustrate that specific distances should not be the prime measure for guarding against the spread of infectious diseases. The problems inherent in relying on distance for this purpose are summed up in the maxim "Share the water share the disease". In the Saldanha Bay context on a previous inquiry about minimum distances, it was determined by DAFF that the accepted distance is 250m. It can further be noted that Southern Atlantic Sea Farms North Bay site was 250m from the Southern Cross site and was operational. DAFF is also of the opinion that the Bay should be regarded as one Epidemiological Management Unit. We include their letter of December 2014 (see Annexure A to this table).
17.8			Southern Cross Salmon Farms (Pty) Ltd will enthusiastically participate in future constructive discussions directed towards resolving any issues arising. SCSF (Pty) Ltd will also facilitate the active participation of international experts.	Ecosense	Noted.
18.1	Michelle Pretorius DAFF	06/02/2017	1. It is noted that the current application does contain and Environmental Management Program (EMP). The DAFF are currently undertaking a bay wide Basic Assessment for the establishment of an Aquaculture Development Zone, which also has a generic Environmental Management Plan which all industry located within the zone would need to comply with. Please note that the applicant would need to comply with the generic EMP if located within the allocated zones.	Ecosense	An EMP is a requirement for any application for environmental authorisation. Currently neither the ADZ nor the Molapong EMP have been approved. Your concern is noted, but the ADZ EMP can only be considered once finalised and approved. It shall, however be included as a referenced as a document of interest to be taken into consideration for future revisions of the Molapong EMP.
18.2			2. It is noted that the applicant has a Marine Aquaculture Right to farm Brown Trout amongst other species. Please note that the bay wide BA undertaken by the DAFF as well as the current application does not cover this species. Therefore, if this species is to be farmed in the future by the applicant and amendment to the EA or a new application would need to be undertaken.	Ecosense	If Molapong has an existing Marine Aquaculture Right, surely the right would still be valid and cannot be withdrawn on the basis of the ADZ, as this would be against the principles of administrative justice. The ADZ should have exclusions for existing rights so the amendments to individual EA's or the ADZ EA would not be required.
18.3			3. Appendix G refers to the Project Definition distributed by the DAFF under the bay wide BA, however please note that there have been many iterations of this report and so the attached appendix G is no longer up to date.	Ecosense	Noted. The document was included for reference only to show also that the applicant for Molapong is taking the Bay wide ADZ basic assessment process into consideration. We are aware that it may still change.
19	Marne van der Westhuizen Manager: Planning and	06/02/2017	South African National Parks (SANParks) has assessed the above mentioned Draft Basic Assessment Report (BAR) wishes to make the following comments regarding	Ecosense	Noted.

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
	Implementation SANParks - Cape Region		the application:		
19.1.1			<p>1. Proximity of proposed aquaculture areas to declared MPAs</p> <p>1.1 SANParks manages the Langebaan Lagoon Marine Protected Area (MPA) as well as the three island MPA's in the Saldanha Bay around the islands Malgas, Marcus and Jutten. This application proposes aquaculture areas in the Big Bay North area and onto the boundary of the Jutten Island MPA.</p> <p>Jutten Island and Malgas Island are important seabird breeding colonies for the African Black oyster catcher, the vulnerable Cape gannet, the endangered African penguin, bank cormorant, Cape cormorant and crowned cormorant.</p>	Ecosense	There are lease areas that have already been allocated in proximity to Jutten Island, of which the Molapong project has a 1ha site. This site is proposed to be expanded northwards to 15ha. We are aware of the breeding colonies on the various Islands. To our best knowledge, there are no breeding colonies of Cape Gannet on Jutten Island. Malgas Island is one of only six localities in the world that supports breeding Cape Gannet <i>Morus capensis</i> (Simon Todd Consulting, 2016 - Avifaunal study done for Mittal in Saldanha Bay).
19.1.2			<p>1.2 SANParks is concerned about the increasing number of aquaculture areas proposed via individual applications onto the island MPA's, including impact on access to the islands. SANParks is not in favour of the proposed zone onto Jutten Island, as set out in this application, and recommends that only the Big west toast Bay North area be investigated for further aquaculture zones.</p>	Ecosense	<p>This application does not intend to set out a zone near Jutten Island, but only a 15ha site, which would be an expansion of the existing lease already allocated to the applicant.</p> <p>The zones are being dealt with in the ADZ application.</p>
19.1.3			<p>1.3 Potential impacts of the various aquaculture farming methods on the breeding colonies on the three islands need to be exhaustively assessed by specialist input. This should include: potential mortality, change in feeding behaviour and disruption of breeding patterns. This data should inform the provision of adequate buffer zones around the MPAs and the buffer extent should be to the satisfaction of National Department Environmental Affairs (DEA).</p>	Ecosense	<p>It is assumed that this comment refers to the ADZ application for which a marine ecology assessment has been undertaken to address potential impacts of the various aquaculture farming methods on the breeding colonies on the three islands. The study is currently available for public review on the SRK website: http://www.srk.co.za/en/za-saldanha-bay-aquaculture-development-zone</p> <p>The Molapong project proposes sea cages to cover 50% of a total area of 55ha, to be distributed over two lease areas in order to allow for fallowing. As per the ADZ EMPr, Molapong will therefore be able to adhere to the requirement that finfish cages do not occupy more than 30% of the total area allocated for finfish farming at any one time. Mussels and seaweed culture in the vicinity of Molapong's cages would mitigate nutrient loading for finfish culture.</p> <p>Only one lease area would be located close to Jutten Island, but outside the MPA. No cages from the Molapong project would be located close to any of the other islands.</p> <p>Cages would be covered with netting that complies with the recommended type of mesh sizes of < 6 cm, as specified in the Marine ecology assessment undertaken for the ADZ.</p> <p>No entanglement of birds of any kind has been recorded at Molapong's experimental project site in Big Bay.</p>
19.2.1			2. Ecological impacts	Ecosense	The Molapong project on its own would have negligible impact on

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			<p>2.1 Note that the 'No' ticks in Section F, Table (b): Biological aspects (p. 29 of the Draft BAR document) are not correct and that the development will have an impact: The Saldanha bay is a linked ecosystem. Approximately 12% of the volume of the Saldanha Bay - Langebaan Lagoon system is exchanged during a spring tide (Shannon & Stander 1977). Any changes in water quality, particularly close to the entrance of the lagoon, will impact on the endangered and threatened habitats, as mentioned, but also on endangered ecosystems of the Langebaan Lagoon (which is also an international Ramsar site and declared part of a national park), and listed species (such as the most endangered marine mollusc, the limpet <i>Siphonaria compressa</i>).</p>		<p>the Langebaan lagoon system due to its proposed location. This section of the BAR has therefore been revised accordingly to reflect negligible instead of no impact.</p> <p>It is important to address the potential cumulative impacts of all projects together, which is being dealt with through the ADZ process.</p>
19.2.2			<p>2.2 SANParks is concerned over the impact of water quality on the lagoon and associated MPAs, the fact that this marine environment is classified as Endangered, and that the proposed site is next to an Island hosting large numbers of endangered seabirds, and a Lagoon hosting endemic linefish species vulnerable to disease transfer.</p>	Ecosense	<p>Water quality impacts have been discussed in 7.2 and 17.5 above</p> <p>Bird impacts have been discussed in 19.1.1 above</p> <p>Disease transfer risk from cultured to wild stock is high, but can be reduced to very low. See Section 4.5.4 of the marine Ecology assessment available on http://www.srk.co.za/en/za-saldanha-bay-aquaculture-development-zone which states the following: "The potential effects of the spread of diseases from finfish cage culture are deemed of high intensity, would potentially be irreversible, thereby persisting beyond the duration of the aquaculture activities themselves, and are thus considered to be of HIGH significance without mitigation. Suitable management would, however, reduce the significance to VERY LOW"</p> <p>Additional response after March comment period: Please also refer to discussions on disease in the focus group meeting proceedings of 22 March, included under section 4.1 of this Comments and Responses Report.</p>
19.3.1			<p>3. Pollution potential</p> <p>3.1 An assessment of impacts on water circulation and water quality is required of both water- and land-based aquaculture activities and facilities. Impact on water quality is a major concern, specifically at the Big Bay South zone, at the entrance to the Langebaan lagoon MPA, where all water circulation will go through the aquaculture zone to get into the lagoon, which could have detrimental effects.</p>	Ecosense	<p>These are bay-wide impacts being addressed in the ADZ study, and has also been included in the marine ecology assessment undertaken for the ADZ application.</p> <p>According to CSIR modelling (also included in the Marine Ecology Assessment Report for the ADZ), the outgoing seabed currents are stronger than incoming seabed currents. http://coastalmodels.csir.co.za/00059/000b.gif Similarly their modelling shows stronger outgoing surface currents http://coastalmodels.csir.co.za/00059/000a.gif</p> <p>Both models show strong flushing in the lagoon area.</p> <p>The proposed Molapong project would not be located close to the mouth of the lagoon, further reducing the risk of affecting water</p>

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					quality in the lagoon. Additional response after March comment period: Please also refer to discussions on water quality and monitoring in the focus group meeting proceedings of 22 March and subsequent meeting notes and email correspondence with the SBWQFT, included under section 4.2 of this Comments and Responses Report.
19.3.2			3.2 Direct pollution as well as potential for increased pollution from service vessels needs to be assessed: What will the impact (environmental and economic) be on the West Coast National Park, including the ramifications for the international Ramsar status of the lagoon, with regards to circulation within the bay, disturbance of breeding colonies, changes in ecosystem dynamics and possibly prey availability, etc.?	Ecosense	These are bay-wide impacts being dealt with in the ADZ study. The Molapong project would use one vessel twice daily for feeding and monitoring of their sites. Part of the EMPr includes regular servicing to limit potential impact from equipment, which includes boats.
19.3.3			3.3 The impacts of high metal loads and point sources of pollution within the greater Saldanha Bay area on the quality of the species farmed and the viability of expanding existing aquaculture activities in the bay, given the expansion of the industrial node around Saldanha Bay (IDZ) need to be assessed.		As the commercial viability of the product will be dependent on quality, it is an important aspect to monitor, but not within the ambit of the EMPr as the high metal loads is not as a result of the fish farm.
19.3.4			3.4 Nutrifaction and sedimentation impacts of the aquaculture activities (feeding, finfish excrement, etc.) on the bay and Langebaan lagoon is a concern requiring specialist assessment.	Ecosense	Your concern is noted. This has already been assessed in the ADZ marine ecology study and the BAR assessment will be updated accordingly to refer to the marine ecology report where relevant.
19.4.1			4. Alignment with broader Aquaculture Development Zone study 4.1 The Department of Agriculture, Forestry and Fisheries (DAFF) is undertaking investigations into a proposed Saldanha Bay sea-based Aquaculture Development Zone. SANParks recommends that the applicant of this proposal familiarise themselves and liaise with the DAFF (or their consultants on the project, SRK consulting) regarding proposed aquaculture areas.	Ecosense Molapong	The applicant has been in constant liaison with DAFF and ADZ elements and requirements have been incorporated into the Molapong application.
18.4.2			4.2 A holistic view of the bay usage needs to be taken into account. Potential impacts on other bay users, such as exclusion of other users of the bay, island visitors, etc. need to be assessed and recommendation provided to minimise conflict.	Ecosense	These are cumulative impacts being dealt with in more detail in the ADZ study. Cumulative impacts have also been considered in the assessment section of the BAR (Section F) The BAR does assess potential user conflict.
19.4.3			4.3 The impact on tourism potential of the area needs to be explored.	Ecosense	The Molapong project would have negligible impact on tourism potential. These are Bay wide impacts being dealt with in the ADZ study.
19.4.4			4.4 Given the sensitivities of the area, alternative sites (i.e. outside the bay) need to be considered and the Saldanha Bay EMF needs to be taken into account.		The Saldanha Bay area is one of a very few areas where sea cages can be installed successfully as it is one of the few protected bay areas along the exposed Western side of the South African coast line where cage culture can safely be practiced. The purpose of the ADZ process is to identify aquaculture zones

NO.	NAME	DATE RECEIVED	COMMENT	RESPONSE BY	RESPONSE
					within the bay, given the aquaculture industry that has already been established due to the site conditions, which are conducive for aquaculture. Molapong sites could fall within the ADZ zones, which are thus being investigated from more than one perspective and with due regard to sensitive areas.
20	N Duarte Saldanha Bay Municipality	31/01/17	The Draft Basic Assessment Report: Proposed Molapong Aquaculture Project dated December 2016 refers.		
20.1			Thank you for the clarification with regard to the DAFF RoD and the current process which the applicant is following.	Ecosense	Noted.
20.2			Where will the fishmeal component of the feed be sourced from?	Molapong	Molapong will adhere to Aquaculture Stewardship Council (ASC) Standards. Part of the ASC and Feed manufactures standards are to source fishmeal from monitored and sustainable fisheries
20.3			Saldanha Bay Water Quality Trust is a monitoring body in the Saldanha Bay and Langebaan Lagoon. Please contact Mr Christo van Wyk metsal@imagnet.co.za for more information.	Ecosense	Noted. They were identified as stakeholders and also received a copy of our notification. Molapong aquaculture attends meetings of the Saldanha Bay Water Quality Trust, as a matter of fact it is one of the special recommendations from DAFF to make sure that there is interaction between all water user forums.
20.4			Please inform the Environment and Heritage Section of the Saldanha Bay Municipality of any archaeological finds.	Ecosense	Noted.

Dear Messrs Stander and Ågotnes

RESPONSE TO MINIMUM DISTANCE REQUIREMENT BETWEEN FISH FARMS IN SALDANHA BAY QUERY

The Department of Agriculture, Forestry and Fisheries supports aquaculture initiatives that have potential of addressing food security, economic development and rural development among other key developmental agendas. These initiatives must be inclusive in nature and be developed and managed in an environmentally sustainable manner.

The Department has deliberated on the matter of implementing minimum distance between farms forwarded by Transnet National Ports Authority. Additional information and supporting documentation was provided by the Western Cape Aquaculture Development Initiative (WCADI), Mr. Henk Stander and Mr G. Ågotnes. The request to obtain a minimum distance between fish farms operating in Saldanha Bay was discussed at the Marine Aquaculture Working Group (MAWG) meeting held on the 10th December 2014. The following recommendations were made by the MAWG on the matter:

- It was recommended that Saldanha Bay be treated as one Epidemiological Management Unit (EMU) due to the small size and nature of the bay. Farms should be spaced apart as far as possible within this zone and farmers "encouraged" to coordinate their activities, such as stocking and fallowing regimes. It was also identified that there is a need to accommodate other farmers in the interests of encouraging development of aquaculture in South Africa. Ultimately a carrying capacity will need to be determined for the bay to address environmental sustainability along with economic imperatives
- It was stated that a minimum distance between farms is a viable disease control measure, but not the only factor to be considered for effective animal health management within the bay. It was recommended that suitable biosecurity measures

ANNEXURE A

are implemented such as animal health testing of fish prior to stocking of cages and routine disease monitoring of the fish in the cages. The management of diseases must be done in a co-ordinated and holistic manner and must include other controls such as import and movement controls.

- It was stated that Norwegian guidelines for disease management of fish farms cannot be adopted under all scenarios.

Please do not hesitate to contact the Department for further queries or clarity.

Yours sincerely



MS. ZIMASA JIKA
ACTING DIRECTOR: SUSTAINABLE AQUACULTURE MANAGEMENT
DATE: 19/12/2014



5.3 Comments received on application BAR, distributed to identified interested and affected parties in March 2017

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
21	Inge Frost	20/03/2017	Please email me the link regarding this BA report	Ecosense (email response)	Please find the documents at the following link: https://drive.google.com/open?id=0B0S5f5xTP1HHUlpUeFB3ZHIQZnc Please let me know if you wish to register as an interested and affected party. We will then register you as interested and affected parties and you will receive future correspondence related to the application. If you wish to comment, please send your comment in writing and state the issues that may be of significance in consideration of the application, as well as any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application. Regulation 43 (1) of the EIA Regulations state that: "A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application." Please also note the DEADP reference number in any correspondence.
22.1	Keith Harrison – West Coast Bird Club – Conservation	25/03/2017	The West Coast Bird Club objects to sea based aquaculture projects, which is also the policy of BirdLife South Africa.	Ecosense	Your objection is noted.
22.2	Keith Harrison – West Coast Bird Club – Conservation	25/03/2017	Alien disease can be brought with eyed ova from eg. Scandinavia to South Africa, as happened in Pacific Canada.	Molapong	Importation of Salmonid ova is regulated through the Animal Diseases Act 35 of 1984, which stipulates that all animals imported into South Africa, need to have the following documentation. 1) There needs to be an agreement between the exporting and the importing country on the specific disease free certification and testing protocol, prior to any import permit being issued. The exporting country needs to issue a health certificate in which it states that the Ova are free of OIE listed diseases. This needs to be signed by the regulating authorities (usually a state veterinarian) upon a final inspection of the ova. 2) Upon arrival of the ova in South Africa, the State veterinarian checks both the import and export original health certification and makes sure they comply. 3) A sample is then taken by the state veterinarian and sent for disease testing by Onderstepoort Veterinary Institute. The ova are then moved to an approved and DAFF registered hatchery where they are hatched, but kept in quarantine until the batch receives the final clearance from the state veterinarian, based on the results from Onderstepoort Laboratory.

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
				DAFF Disease Specialist Kevin Christson	<p>4) It is through this rigorous sampling and testing protocol, both at the exporting country and in South Africa, that our country has been kept free of any OEI listed diseases that affect salmonids. It is in the best interest of both the commercial grower that produces the ova and the commercial grower that does the ongrowing of the fish, to keep their respective countries and facilities disease free.</p> <p>5) Unfortunately, the pet trade is currently not very well regulated and the diseases that have entered our country have been brought in via the koi trade (Koi Herpes Virus KHV) and wild fish moving down from our neighbouring countries such as Mozambique and Botswana due to global warming in cases such as Tilapia and Catfish.</p> <p>Trout and salmon eggs get tested when leaving the country of origin and once they arrive in South Africa, they get tested again and placed under quarantine until the results are negative for OIE listed diseases typically those viral diseases associated with salmonids. Salt water is very good at removing parasites in fresh water fish and he thinks that the smoltification process where are transferred from fresh water to salt water in the cages will be healthy get rid of any possible parasites the fish may have. He states that he does not think that there is a risk of introduction alien diseases into the country by the project. Regarding the matter of disease/parasites transfer from the fish in the cages to the wild fish stock. In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project farms salmonids and there are no naturally occurring salmonids in the bay. There are no realistic risks and no chance of transfer of the usual external parasites such as Salmon sealice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages. They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation inventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process, will mean that there is a low risk (as confirmed by risk assessments, Appendix G of the BAR).</p>
22.3	Keith Harrison – West Coast Bird Club – Conservation	25/03/2017	Increase the organic load in the water.	Molapong / Ecosense	<p>Fin fish production in the bay does increase the organic load in the bay. This potential impact is however mitigated by:</p> <ul style="list-style-type: none"> • Use of highly digestible specialized salmonid diets, which increase the fish growth and reduce the amount of waste/ organic nutrients produced. • Use of Mussel and seaweed culture next to the fin fish cages, which take up

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					<p>a large percentage of the available organic nutrients in the water column.</p> <ul style="list-style-type: none"> The flushing rate of the bay, which is estimated to be twice the entire volume of the outer bay daily. Studies by Monteiro and Largier (1999), found that stratification and associated density-driven exchange flows are capable of flushing the bay in 6–8 days. This means that any additional nutrients left in the water not taken up by the mussel and seaweed units, will be very quickly diluted and flushed out of the bay. The phased approach to increasing production over at least 5 years supports the early detection of potential impact issues. The mitigation measures discussed and specified in the EMP and ASC standards as well as the very conservative stocking density caps in relation to the bay wide estimated carrying capacity (15% of estimated capacity and then this application is for 2000 t which is approximately 40% of the 15% cap) will give good margins of safety to overexploitation. There are further recommendations for an industry wide liaison and monitoring committee, which DAFF has indicated is going to be implemented. There is also commitment from DAFF to ensure authority oversight and accountability in relation to ensuring monitoring and implementation of both license conditions and approved specifications. See also EMP, ASC standards (Annexure to the EMP) and minutes of the Focus group meeting of 22 May 2017 as included in section 4.1 of the Comments and Responses report, Appendix F to the BAR.
22.4	Keith Harrison – West Coast Bird Club – Conservation	25/03/2017	The feed is based upon small pelagic fish species on which seabird species depend.	Molapong and Ecosense	<p>The feed that is currently used on the experimental farm in Saldanha has a 15% inclusion rate of fishmeal from a sustainable source. South African fishmeal is of too low standard to be used as fish feed, most of our fish meal is exported to the East for poultry feed. No local fish species is therefore used for feed.</p> <p>It is envisaged to trial out a new diet by the same producer which is 100 % free of marine proteins. Fish meal inclusion from a sustainable source is however only one of the fish feed ingredients that are audited in the ASC certification audit scheme. All ingredients included in the diet, including Soy and Palm oil need to be from certified sustainable sources. Please refer to the ASC standards that have been included as part of the Environmental Management Programme for implementation by the project. The EMP specifies feed management in Section 5.6.11</p>
22.5	Keith Harrison – West Coast Bird Club – WCBC - Conservation	25/03/2017	Food not consumed falls through the cages and attracts small fish which attracts Crowned Cormorants, who become entangled with the base of the cage and drown. Crowned Cormorants numbers are threatened.	Molapong and Ecosense	<p>The aim of finfish farming is to grow fish with the least amount of feed. Wastage of feed is therefore avoided as far as possible through careful calculation of the daily required feed amount, observation of the feed activity by the person feeding the fish as well as divers. It should be noted that during the 2 year period that the experimental trout farm in the Bay have been in operation, not a single case of bird or predator entanglement has been reported.</p> <p>It was also noted at the Focus Group meeting by Mr Harrison that there is</p>

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					concern for various species of birdlife being threatened by infrastructure especially at times when there are mass swarming and feeding onto fish "bait balls". Although there is observed occurrences of such feeding there have been no infrastructure related observations or reports of incidents during the 5 years by or to the farm managers. There has not been any observed intersection of bait balls with the trial cages to date. The EMPr specifies incident management (which could include bird entanglement) in Section 5.6.12
22.6	Keith Harrison – West Coast Bird Club – WCBC - Conservation	25/03/2017	The islands at the entrance of the bay hold over 80,000 breeding sea birds which are predated upon naturally during the breeding season. The cages will provide a potential prey presence the whole year round attracting more predators, this will increase pressure upon local sea bird populations.	Molapong	The mere presence of a potential feed source only increases pressure on the local seabird population if this results in a negative impact on those populations. As stated above, no bird entanglements have been reported over the past two years. It has been noticed that wild fish fry are taking refuge around cages, which implies that cage structures become a potential safe haven for the fish, which eventually could result in a higher and healthier natural fish stock in the bay, which potentially result in a higher fish stock available for the local seabird population. It must be noted that to date there have been no breaches of predators into the cages during the trial phase, however Inspection protocols for cage and infrastructure as well as observation returns at these and feeding times make allowance for reporting of seabird predators see section 5.6.9 of the EMPr. There have been no incidents of birds getting tangled in the nets. No entanglements of predators such as seals or dolphins. The type of net used is called DYNEMA, which is strong and does not allow any predators to break into the cage net. At the moment, the bird interaction has been with some Kelp gulls and a few Hartlaub gulls that hang around the cages, waiting for a fish pellets to float outside the net. In a follow-up meeting with BirdLife South Africa, specific bird location concerns were not raised (See section 4.3 of the Comments and Responses Report for notes from the meeting).
23	D.A. Whitelaw Chairman Cape Bird Club Conservation Committee	26/03/2017	I would be most grateful if you could register me an IAP for this project.	Ecosense (email response)	We have registered you as a stakeholder and you will be receiving future correspondence about this application
24	Christo van Wyk Saldanha Bay Water Quality Forum Trust	16/03/2017	Please add me to I&AP list. Also forward the BA	Ecosense (email response)	We will register you as a stakeholder. The BAR will be uploaded by Monday 20 March. We will forward you the link as soon as it is ready.
25	Bev le Sueur SAS WC	30/03/2017	Please confirm that SA Sailing WC is an IAP/Stakeholder on your records. Our initial objection was sent to your offices in good	Ecosense (email)	Yes, SA Sailing WC has been registered, and we received your previous correspondence. It has been included and responded to in the draft BAR

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	CHAIRPERSON		time	response)	currently available for comment. Please let me know if you have any further comments. Additional response - refer to point 16 above for detailed response previously given.
26	Deirdré Pretorius West Coast Business Chamber	22/03/2017	Please advise what is needed for the West Coast Business Chamber to register as a stakeholder of the Molapong Aquaculture project	Ecosense (email response)	Please find the documents at the following link: https://drive.google.com/open?id=0B0S5f5xTP1HHUlpUeFB3ZHIOZnc We will register the West Coast Business Chamber as interested and affected party. Please send me your postal address if you wish to receive correspondence by mail, otherwise we are happy to send correspondence by email. If you wish to comment, please send your comment in writing and state the issues that may be of significance in consideration of the application, as well as any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application. Regulation 43 (1) of the EIA Regulations state that: “A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.” Please also note the DEADP reference number in any correspondence
27	Michael Clemitson Ag Technical Services Limited	28/03/2017	Thank you for sending me the link to your Basic Assessment report. It is certainly comprehensive and makes interesting reading. It would be much appreciated if you would register me, either as an individual or through my business, as a stakeholder so that I may keep abreast of your progress.	Ecosense (email response)	I will register you on this email address so we can send you future correspondence.
28.1	Marina Black	24/03/2017	Thank you for the pre-application phase BAR. I would like to register as a stakeholder and but in the meanwhile please can you help me better my understand this BAR.	Ecosense (email response)	Thank you for your comments received. You have been registered as a stakeholder.
28.2	Marina Black	24/03/2017	It appears to me that the locality map and TNPA Leases all depict areas beyond inner bay, but in Appendix E – Marine Aquaculture Right ROD Signed 08 June2016 states “...at the allocated sea space in the Inner Bay, Saldanha Bay.”	Ecosense	That is correct. Although not accurate, the reference to Inner bay was for the 50 t experimental project and the aquaculture right is allocated for the farming of fish. The production capacity is at the minimum for which Authorisation is not required under NEMA. It was therefore noted that should the project be expanded, that a basic assessment would be required. This would not affect the right that has been issued (for fish farming), but any conditions or requirements from the application process would need to be complied with. The areas being applied for are as indicated on the TNPA and locality maps.
28.3	Marina Black	24/03/2017	The Vanderkloof Dam details do not seem relevant to Saldanha, but in Appendix E – Exemption with conditions trout	Ecosense	Correct. These are not directly relevant. The comments on the Coho and King permits regarding effluents not being allowed to reach the water way are

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			aquaculture research This is regarding Vanderkloof Dam and is for 2 floating cages 100m from the shore. Point 4. "Cages must be visible to other user groups on the dam and appropriate navigational markers must be used" How are these permits being adhered to, in a tidal lagoon, if no effluent is allowed to reach the waterways, as in Appendix E – Coho farming permit Point no. 33 on page 4/5 "No effluent is allowed to reach any waterways." And Appendix E – King farming permit. Point no. 33 on page 4/5 "No effluent is allowed to reach any waterways."		specifically for the DEA hatchery permit for the COHO and King salmon, which is at Vanderkloof. The Vanderkloof reference was only included to show examples of the intent regarding compliance with permit conditions, but has been removed from the BAR as it has caused confusion. Thank you for this observation. The marine right that was granted, as well as the relevant permit for mariculture has now been included in Appendix E to the BAR.
28.4	Marina Black	24/03/2017	The photo stating that the cages are not visible from Marc's Beach Bar is false. Appendix C - Photos	Ecosense	The cages are not visible in the photo, which was taken at sea level. We agree that they might be visible at elevated height. It should be noted that the site which is being applied for is located further north and farther from Langebaan and will entail that the cages at the experimental site will be removed and no longer be visible in that location.
28.5	Marina Black	24/03/2017	It is my understanding that Viking Fishing / Malapong currently have a few experimental fish cages and if I am not mistaken these are not in Inner Bay; do not have navigational lights; definitely do allow effluent to reach waterways and is visible from the shore.	Ecosense	The experimental project consists of 6 cages. They are located in Big Bay south. They do have navigational lights (see Appendix C to the BAR with photos added of the navigational lights on the cages and buoys). There is no effluent from cages as there is no processing. Nutrients from feed and feces are however released. The mitigation for this is the use of Mussel and seaweed culture next to the fin fish cages, which take up a large percentage of the available organic nutrients in the water column. The flushing rate of the bay is estimated to be twice the entire volume of the outer bay daily. This means that any additional nutrients left in the water not taken up by the mussel and seaweed units, will be very quickly diluted and flushed out of the bay. The project location is also away from the lagoon. We did state in our report that cages may be visible from an elevated height, and that larger configurations would be more visible, but mitigation proposed would reduce the impact.
28.6	Marina Black	24/03/2017	This BAR is a draft EMP to develop a sea-based aquaculture project to produce 2000 tons (t) in a phased approach and this will not be in Inner Bay and effluent will reach the water, so are these permits not applicable to the BAR and if so then where are the applicable permits?	Ecosense	This draft BAR includes a draft EMPr. The application process intends to obtain the necessary authorisation for the project. The applicable permits are included in the BAR, Appendix E. If this comment is referring to an effluent permit from cage culture then there is no such permit requirement for sea cage farming.
29	Liesel Delpont Boschendal	20/03/2017	Please register Rob Lundie and Sam as objectors	Ecosense (email response)	I phoned this morning and also left a message on your cell. Please send me the contact details and the reason for the objection of the two individuals. They must state the issues that may be of significance in consideration of the application, as well as any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application. We will register them as interested and affected parties and they will receive future correspondence related to the application. Regulation 43 (1) of the EIA Regulations state that: "A registered interested and affected party is entitled to comment, in writing, on all reports or plans

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					submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application." Please also note the DEADP reference no in any correspondence. Additional response: As we have yet to receive details for "Rob Lundie and Sam", Liezel Delpont has been registered to receive follow up correspondence instead.
30.1	Save Langebaan Lagoon Action Group Inge Frost	20/04/2017	The Save Langebaan Lagoon Action Group, representing more than 1000 residents, home owners and various businesses, herewith wishes to register as an Interested and Affected Party with regard to the above project. Please confirm via return email to savelangebaanlaqoon@gmail.com that we have been registered as an IAP.	Ecosense (email response)	Confirmed via email on 21 April.
30.2	Save Langebaan Lagoon Action Group (SLL) Inge Frost		Re: Application for extension of deadline for comment period: Molapong Aquaculture project Saldanha Bay (DEADP) REF # 16/3/3/1/F4/17/3014/17 This letter has been written without prejudice. The present deadline for comment on the BAR for the above project is Friday 21st April 2017. Herewith, Save Langebaan Lagoon Action Group (SLL) respectfully requests an extension of this deadline for a further period of 30 days, until Friday 19th March 2017. We make this request in the spirit of full, fair and transparent application of the Public Participation process, as envisaged under law. In motivation for this request: On behalf of over a 1000 Langebaan businesses, home-owners and residents, the SLL contends that we have been given an unreasonably narrow timeframe for considered commentary, as the window for response negates a comprehensive interrogation and understanding of the large volume of expert information contained in the BAR. The Public Participation process unambiguously requires that I&APs are not only given access to relevant information with regard to a proposed activity, but are able to comprehend such information. I&APs must have both access to the information and the opportunity to interrogate the meaning to ensure that all aspects, and therefore impacts, of a proposed development can be critically evaluated. In this context, the current deadline will exclude I&APs from meaningful participation in and contribution to the proposed development. SLL was established on 8th March 2017, in response to the Proposed Saldanha Bay Aquaculture	Ecosense (email response)	Thank you for your comment received. I would like to state that Ecosense did not fail to accommodate your request for extension. In our first telephonic discussion of Friday 21 April, I indicated to you that since an application for authorisation has already been submitted, it would compromise the legislated timeframes to allow extension until 19 May 2017. I did, however, indicate that we will be arranging a focus group meeting to which you would be invited and that I could give you extension to submit comment until 2 May. You phoned me a second time and asked which the latest time on Friday 21st was that I would accept your comments, upon which I indicated any time. You, however, asked that I send you an email stating that we would accept your comment until 17h00 on the 21st, which I did. This created the impression that you were able to submit comment. I therefore wish to emphasise that Ecosense should not be seen as unreasonable, but simply acting within the legislated requirements for this application. We will be in contact with you regarding the focus group meeting and respond to your comments in due course. Additional response: Subsequently further and detailed engagement was undertaken and can be supported in the Focus group meeting proceedings included in section 4.1, notes from the SBWQFT meeting, section 4.2 and BirdLife SA meeting notes, section 4.3 of the Comments and Responses report, Appendix F of the BAR. Please also note that the public participation process is ongoing and will include further correspondence to I&AP's including any decisions and further requirements from the determining authorities that have full access to all objections, comments and responses.

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			Development Zone and the associated BAR compiled by SRK (aka SRK Project Number 4990220). From our inception, the SLL's collective effort and attention was directed to drafting a credible response to meet the comment period deadline of 31st March. It would be unreasonable and procedurally flawed to expect that our public interest group would also be able to timeously and thoroughly respond to the BAR for the Molapong project proposal, due to the overlapping timeframes of both EIA processes. Please confirm by close of business on Thursday 20th April 2017 if this extension has been granted.		
31	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	This Letter of Objection is submitted without prejudice. We, the membership of the Save Langebaan Lagoon Action Group (SLL), representing over 1000 Langebaan residents, hereby lodge our outright objection to the proposal for an aquaculture development zone in the areas as demarcated and explicated in the Basic Assessment Report (BAR), Molapong Aquaculture project Saldanha Bay (DEADP) REF # 16/3/3/1/F4/17/3014/17 We wish to state that we are not opposed to aquaculture developments per se and recognise the industry's potential to contribute to food security, job creation and BBEE. However, we are opposed to the current scope and scale of the development, in the sites proposed. This Letter of Objection is to be read in conjunction with and in addition to the objections already submitted by stakeholders / I&APs and incorporated by Ecosense Consultants in the "Comments and Responses" report of the BAR, with particular reference to: - Submission by South African Sailing (Pg. 19) - Response by South African National Parks (Pg. 27) Further, to be read in conjunction with email from Christo van Wyk – Saldanha Bay Water Quality Forum Trust (SBWQFT), submitted to you, 19th April 2017 and the submission by Organic Aqua, Appendix 1, attached to this Letter of Objection. Our objections are as follows:	Ecosense	It is noted that this group represents some 1000 members and therefore supports the public participation process in the dissemination of information for this project. We trust that all members are also copied with the relevant information and updates as we can only correspond with your leadership representatives. <i>Please also note that the objection by Organic Aqua was not submitted to Ecosense, but to SRK for the ADZ application.</i> The phased approach to increasing production over at least 5 years supports the early detection of potential impact issues. The mitigation measures discussed and specified in the EMPr and ASC standards as well as the very conservative stocking density caps in relation to the bay wide estimated carrying capacity (15% of estimated capacity and then this application is for 2000 t which is approximately 40% of the 15% cap) will give good margins of safety to overexploitation. There are further recommendations for an industry wide liaison and monitoring committee, which DAFF has indicated is going to be implemented. There is also commitment from DAFF to ensure authority oversight and accountability in relation to ensuring monitoring and implementation of both license conditions and approved specifications. See also EMPr, which includes the ASC standards (Appendix H to the BAR); and minutes of Focus group meeting in section 4.1 of the Comments and Responses Report, Appendix F to the BAR. Please also note that the public participation process continues and will include further correspondence to I&AP's including any decisions and further requirements from the determining authorities that have full access to all objections, comments and responses.
31.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	1. Public Participation We contend that the public participation process conducted by Ecosense Consultants (Ecosense) to date falls short of the legal requirements and intentions as set out in the National Environmental Management Act (107 of 1998) as amended (NEMA) and the EIA Regulations GNR 982 of 2014. _	Ecosense	Ecosense submits to have complied with the legal and minimum requirements as set out in Chapter 6 of the Regulations. Ecosense submits further that the process has in fact surpassed the guideline requirements and Public Participation continues to be applied in the form of focus group meetings, liaison meetings with authorities, technical monitoring liaison with specific interest groups & issuing of updated BAR documentation. It will further be continued in notifications of any authority decisions and any post authorisation processes.

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					That there can be improved and wider consultation is not disputed but in terms of the legal obligations and guidelines we submit that these have been met and surpassed both in spirit and fact.
31.1.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	1.1. Tourism is a critically important economic contributor to the town of Langebaan. Thus it should have been foreseeable by Ecosense that due to the popular holiday destination of the town, a high percentage of home owners do not live permanently in Langebaan and therefore would have been excluded in the stakeholder engagement process (advertisement placement, notification sites,) as detailed in the BAR, Section C, Pg.22. As such, the legal requirement contained in section 40 (2) (d) of the EIA Regulations (2014) that the public participation process “must provide access to all information...and must include consultation with all potential, or, where relevant interested and affected parties” could not be fulfilled.	Ecosense	We wish to note the availability of the pre-application draft basic assessment report over the holiday season for an extended time period from 15 December to 6 February, specifically for the reason of giving the opportunity for notifying holiday visitors, absentee landlords, and business owners etc. that may only be present at these times.
31.1.2	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	1.2 Section 40 (2) requires “consultation” with prescribed stakeholders. How has this requirement been interpreted in the public participation process to date? It is unclear /absent from the BAR the manner in which Ecosense consulted with the stakeholders to the full extent envisaged by section 40(2) (b) and (c) of the EIA Regulations and giving full effect to the purpose of public participation. Page 10 of the Comments and Responses Report of the BAR refers: Was this the full extent of the placement of notifications of the proposed development? If so, notification placement was biased towards those having access to the Saldanha Bay area. From the photographs depicted on page 10, it appears that the only notification placement in Langebaan was at the Langebaan Yacht Club. Were there other notification placements in more accessible public sites in Langebaan that would attract a broader demographic, more representative of the Langebaan community? Consultation is clearly contemplated in the preamble to NEMA and in section 4(f)). The guidelines for interpretation of the wording of the Act require that interpretation “is consistent with the purpose of this Act” (section 1 (3)). In this context then, Ecosense failed to facilitate an inclusionary process, by removing all barriers to full involvement with all potential I&APs, so as to engender understanding and thereby promote active participation and contribution by the potential I&APs. Thus the approach to engaging with the I&AP’s, as envisaged by the legislation, the courts and the regulatory guidelines, is procedurally deficient and as such, the incompleteness of a material process cannot be	Ecosense	<p>A complete and detailed explanation of the public participation process has been included in the Comments and responses report, section 1. In summary, the following:</p> <ul style="list-style-type: none"> • Authority consultation by providing a draft report for initial input - Sept 2016. Comments and responses included in the BAR, Appendix F. • Pre-application draft BAR distributed to stakeholders identified in the ADZ process, details provided by the DAFF. Comments and Responses included in the report, appendix F; • Draft BAR circulated to additionally identified stakeholders, plus again the same list to which it was distributed in December, newspaper advert, as required by the Regulations and notices on the cages as well as popular public places. <p>Section 40 (3) of the Regulations state that Potential or registered interested and affected parties, including the competent authority, <u>may</u> be provided with an opportunity to comment on reports and plans contemplated in sub-regulation (1) prior to submission of an application but <u>must</u> be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority. We have undertaken to do both. In addition, Focus group meetings with key stakeholders and those community groups who have registered as IAPS have been organised to provide a forum for constructive, focused and meaningful discussions to enable representatives of interest groups to better understand and convey information to their respective groups. Proceedings and notes from these meetings are included in sections 4.1-4.3 of the Comments and Responses report, Appendix F to the BAR.</p> <p>We contend that the process cannot be regarded as incomplete if it has not</p>

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			used in the assessment of the merits of the BAR.		run the full course yet.
31.1.3	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	1.3 What “reasonable alternative methods”, as required by section 41 (2) (e) (iii) of the EIA Regulations, were used to ensure that those home owners who do not live permanently in Langebaan, and are therefore disadvantaged in their ability to participate, were informed? What “reasonable alternative methods” were used for those potential I&Aps who may be illiterate, or who have “any other disadvantage” in being able to participate in the public participation process as per section 41 (2) (e) (i) – (iii)?	Ecosense	It is our opinion out of years of experience with EA application processes and public participation requirements as contemplated by the Regulations and interpreted by competent authorities that it would never be possible to ensure complete inclusion of all potential IAPs. As such, following the minimum requirements provides a reasonable chance for the person conducting the EIA process to reach all potential IAPs. The advantage that many IAPs in the Langebaan area has is access to social media regardless of where they reside, which has been demonstrated by the Facebook groups Save the Langebaan Lagoon and People Against Aquaculture in Saldanha with a fairly large following. By informing ward councillors as representatives of their communities, which may include illiterate, disabled or disadvantaged persons, it provides another mechanism for reaching potential IAPs. Five different ward councillors were informed. None responded. Even though not initiated by Ecosense, the bigger ADZ, and by implication the Molapong project has received wide coverage in the media on SABC (Focus programme) and DSTV (CarteBlanche on Mnet).
31.1.3.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	i) Is the Weslander an “appropriate newspaper in terms of accessibility” for all potential I&Aps? (Section 41.1 (c) Public Participation Guidelines (2012) GNR 807). The content of the Weslander is approximately 80% Afrikaans and 20% English (Source: Editor of the Weslander). Is this the language breakdown of the potential I&Aps?	Ecosense	It is our contention that the Weslander is the appropriate newspaper in terms of local notices and distribution.
31.1.3.2	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	ii) Given that many home and business owners do not live permanently in Langebaan, why was there no attempt to place a notification in a national newspaper?	Ecosense	It is not required by the Regulations
31.1.3.3	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	iii) What research was conducted by Ecosense to assess the number of residents in the affected area who speak an official language other than Afrikaans or English?	Ecosense	A census of such scale is not in our mandate.
31.1.3.4	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	iv) What research was conducted by Ecosense to establish the level of illiteracy amongst the Langebaan community to ensure that all potential I&Aps could participate meaningfully in the public participation process?	Ecosense	The literacy rate for Saldanha Bay region, which includes Langebaan, is reportedly approximately 86% (according to the Saldanha Bay Municipality Socio-economic profile of 2016, published by the Western Cape Government, accessed on http://www.saldanhabay.co.za/pages/IDZ_LED/LED/SocioEconomicProfile.pdf). It can therefore be reasonably accepted that there would be meaningful participation by those interested or affected by the project.
31.1.3.5	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	v) Section 41 (6) (b) of the EIA Regulations refers. Given the socio-economic diversity of the area, the material fluctuations of the Langebaan population during weekends and holidays, and the complexity and volume of the technical and scientific	Ecosense	One can never undertake enough public participation, but has to conform to the minimum requirements, which have been done. The ongoing public participation and news generated on the ADZ and aquaculture project through many media sources including news, TV and social media indicates

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			aspects of the proposal under consideration, additional, more accessible public participation measures should have been implemented e.g. advertisement placed in a regional newspaper; use of radio in local languages; public open day held in a venue closer to the economically marginalised community. We would like to know why Ecosense elected such a narrow interpretation of this requirement, despite the inherent complexities of all aspects of the proposed development and therefore the real risk of exclusion of potential I&APs.		that there is a depth of awareness even if the facts and merits are not adequately or fairly presented. We are also reasonably restricted by both budget and time process constraints.
31.1.3.6.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	vi) Section 41 (6) (a) of the EIA Regulations refers. The BAR is lacking/inadequate in comprehensively elucidating the full impact of the aquaculture development on all aspects that may be affected by such project e.g. (and not limited to) a detailed expert and independent assessment of the socio-economic impact of the proposal;	Malopong	This proposal details that 70 job opportunities will be made available within the Molapong project. The majority of jobs will be for young and unskilled, where the company will be teaching the basic farming skills. The company has access to SETA accredited courses to upskill the staff. At management level are general manager, production managers for the Finfish, Mussels and Seaweed sections. The company looks at the potential of its staff and people and would assist in developing them to management levels as much as possible. Malopong is a level 2 BEE company. Malopong will favour people from the local wider community, Saldanha, Langebaan, Vredenburg. The ASC Standards Malopong is adopting furthermore deals with employment practices, how much overtime people work, ASC talks about a living wage, not a minimum wage.
31.1.3.6.2	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2018	a detailed analysis of the projected revenue and employment opportunities likely to be created by the proposed project, measured against the perceived loss of revenue and employment opportunities as a result of the proposed project;	Ecosense / Molapong	The BAR document clearly states what will be the growth on employment in the next coming years. Currently the company employs during the pilot phase, four local full time employees. The Company has, to date, spend three million Rand on Opex and 2 million Rand on Capex. They have made a further commitment to a company in St Helena bay to build them a 2,5 million Rand workboat (fiberglass hull catamaran), which totals to a current financial commitment of roughly 8 million Rand to date. Total projected financial need for the project is budgeted on 40 million Rand, which will be sourced through internal intercompany loans through its shareholders, Viking Fishing and Viking Aquaculture. Molapong has a 25+ % direct BBEE shareholding and has a BEE certificated rated level 2 and are required by TNPA to remain at level 4 as a minimum. The current model is for harvested fish to be packed on ice and transported to Cape Town, so that the project can focus on the farming side for now. At a later stage local processing may be considered, which could create up to 140 permanent jobs. In addition the company currently employs 10 full time people to two dedicated hatcheries producing fish to go to sea, so the total job opportunities in total associated directly with the project would be about 220 at full scale production.

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					Local suppliers and services are sourced as much as possible.
31.1.3.6.3	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	a more detailed visual impact assessment report specifically for Langebaan.	Ecosense	It must be noted that visual impact assessment is not, by nature, a purely objective, quantitative process, and depends to some extent on subjective judgments. The Molapong project would only be a small component of the ADZ area, which has already considered the cumulative visual impact for the ADZ. A more detailed visual assessment is not considered a further requirement for the Molapong project, which, if the mitigation measures are implemented, residents and visitors to the area may consider the project to be congruent with the marine environment and perceived use of Saldanha Bay as a marine development zone (also considering the existing aquaculture operations within the Bay). Mitigation includes spreading mooring grids over two sites as far as possible to avoid larger concentrations of cages, of which the bulk would be more visible. Reducing height of bird net supports and the use of only one low visibility colour on netting (e.g. grey based hues), downward pointing shaded lights and marking of equipment for retrieval purposes. See also Section 5.6.3 and Section 5.6.10 of the EMPr for details.
31.1.3.7	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	vii) Further, we contend that the shortened timeframes for I&AP response to the BAR (2014 EIA Regulations) militate against effective and full public participation, in contravention of the requirement and intention of the law. As such, Ecosense should have facilitated a broader, more imaginative and inclusive approach to public participation, to ensure that I&APs are able make informed appraisals about and fully participate in the project proposal.	Ecosense	Although there is always scope for increased and more intensive Public Participation, Ecosense has and is continuing to undertake Public Participation that is resilient and effective, borne out by the large number of I&AP's represented by various stakeholders, interest groups, social media platforms, radio and TV features etc. which have reached a wider than anticipated audience. Also note that the comment period and public notices were purposely included over the December / January holiday period to give as wide an exposure as possible to those that may only have an interest when visiting homes or business in the area. There are ongoing opportunities for engagement as the process is open and continuing all the way through to authorisation appeal if required.
31.1.3.8	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	viii) It is clear from the Comments and Responses Report that there has been a poor response to date by individual I&APs, (i.e. those not directly solicited), who nevertheless have a material interest in proposed developments that are likely to negatively affect the town of Langebaan. This strongly suggests an insufficiently executed public participation process.	Ecosense	In addition to our response at point 31.1.3.7, we submit that we cannot be held responsible for the way in which IAPs react, however, there is always scope for increased and more intensive Public Participation.
31.1.4	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	1.4 Given the scale of the proposed aquaculture project and the volume of technical and scientific information contained in the BAR, and given the gaps in the public participation process, why did Ecosense refuse a request for an extension of the commentary deadline from Save Langebaan Lagoon? (Refer request for extension email sent and received, with a follow up phone-call, 20th April 2017). SLL contends that we have been given an unreasonably narrow timeframe for considered commentary, as the window for response negates a	Ecosense	Refer to comment at point 30.2 above. Ecosense did not refuse an extension. The BAR was also sent to Ms Frost upon first inquiry on the day the comment period commenced (refer to point 21 above). SLL therefore had 30 days as prescribed in the Regulations to comment. Upon telephonic inquiry a week extension was offered, but after a second inquiry, comment was submitted timeously on the closing date. As acknowledged in SLL's comment, the shortened timeframes for I&AP response to a BAR as contemplated by the 2014 EIA Regulations can militate against effective and full public participation, especially when taking into consideration the myriad of EIA

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			comprehensive interrogation and understanding of the large volume of expert information contained in the BAR. The Public Participation process unambiguously requires that I&APs are not only given access to relevant information with regard to a proposed activity, but are able to comprehend such information. I&APs must have both access to the information and the opportunity to interrogate the meaning to ensure that all aspects, and therefore impacts, of a proposed development can be critically evaluated. In this context, the deadline for commentary on the BAR has excluded numerous I&APs from meaningful anticipation in and contribution to the proposed development. It is unreasonable and procedurally flawed to expect that our public interest group would be able to timeously and thoroughly respond to the BAR for the Molapong project proposal, due to the overlapping EIA timeframes of the Proposed Saldanha Bay Aquaculture Development Zone (Refer SRK Project Number 4990220).		applications requiring comment at any one time.
31.2.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	2. Socio-economic Considerations Page 19 of the BAR refers: We contend that the interpretation of this requirement was too narrowly applied. The assessment conducted is both linear and superficial in its consideration and fails to account for the disparate “character” of the Saldanha Bay Municipality’s towns. Both Saldanha Bay and Langebaan will be impacted by the proposed aquaculture development, but likely with different outcomes. Albeit that both Langebaan and Saldanha Bay fall under the Saldanha Bay Municipality, the two towns are materially distinct in their character, their economy, their social diversity, population size and their physical settings. Saldanha Bay has a well-developed industrialised footprint, whereas Langebaan has negligible industry, but a mature, vigorous and regionally important tourism sector. By persistently conflating the two towns’ socio-economic landscape under the municipal description “Saldanha Bay” throughout the BAR, a more thorough scrutiny of the unique distinguishing features and attributes of Langebaan and therefore, the scale of the potential impact of the development on the town, is conveniently avoided by SRK. Ecosense’s “one size fits all” approach to the socio-economic aspect will prevent an objective assessment by the competent authority in the decision-making process.	Ecosense	Comprehensive feedback has been given at the Focus group meeting of 22 May, where the socio-economic aspects of the Molapong project were discussed in detail. Please refer to the proceedings included under section 4.1 of the Comments and responses report for these details. (See also 31.2.2 below). We do not dispute the distinguishing characters of the two towns and have in fact referred in our BAR, section B (9) to the wider Saldanha bay municipal area, including Langebaan and the other towns. It is therefore not relevant to refer to the way in which SRK has presented the information in their report, which is a separate application.
31.2.2	Save Langebaan Lagoon Action Group Jennifer	21/04/2017	Services and Tourism are high growth sectors, outperforming manufacturing sectors in terms of job creation. Langebaan Tourism has provided the following top-line employment figures	Molapong	This proposal details that 70 job opportunities will be made available within the model. The majority of jobs will be for young and unskilled, where the company will be teaching the basic farming skills. The company has access to

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	Kamerman		<p>for the sector for 2016: Approximately 2000 permanent jobs and 750 part-time (seasonal) jobs in 2 hotels, 2 resorts, 95 guest-houses, 1150 holiday home rentals – a total of 9500 beds – and 55 eateries. These current figures need to be seen in the context of the Spatial Development Plan for the area Further, it is estimated by Langebaan Tourism that the various water-sport clubs and businesses currently support 161 permanent jobs. At the time of writing we do not have the employment figures for Langebaan’s construction industry which is experiencing high growth levels due to the desirability of Langebaan, both as a residential as well as holiday destination. The BAR does not include a specific economic impact assessment for Langebaan, including a breakdown of current and projected employment figures. Further, there is lack of quality information regarding the employment statistics of the current aquaculture enterprises in Saldanha Bay over time, and the projected employment figures should the proposed project be authorised. As such, the I&APs and other stakeholders do not have adequate comparative information with which to assess the socio-economic benefits of the development and are therefore excluded from fully participating in such assessment. We therefore note with interest the findings by the Minister of Environmental Affairs in the (successful) appeal against the EA issued to DAFF for the Algoa Fish Farm development (Reference: LSA138222 – 18 August 2015), that required the applicant to submit “[a] detailed analysis of the projected revenue and employment opportunities likely to be created by the proposed project, measured against the perceived loss in revenue and employment opportunities as a result of the proposed project...” (Pg.4, clause 4.2.2). It would be counter-productive and misleading to deny that the economic contribution of the tourism and related service industries in Langebaan is inextricably linked to the natural, non-industrialised lagoon vistas, largely unrestrained lagoon and bay access for water-sports and activities and the surrounding ecological integrity i.e. Langebaan has a high value natural sense of place. The Molapong proposal threatens these key attractions and attributes which is likely to precipitate the erosion of a currently healthy, growing, sustainable economy.</p>	<p>DAFF</p> <p>Ecosense</p>	<p>SETA courses to upskill the staff. At management level are general manager, production managers for the Finfish, Mussels and Seaweed sections. The company looks at the potential of its staff and people and would assist in developing them to management levels as much as possible. Malopong is a level 2 BEE company. Malopong will favour people from the local wider community, Saldanha, Langebaan, Vredenburg. The ASC Standards Malopong is adopting deals with employment practices, how much overtime people work, ASC talks about a living wage, not a minimum wage.</p> <p>The BAR document clearly states what will be the growth on employment in the next coming years. Currently the company employs during the pilot phase, four local full time employees.</p> <p>The Company has, to date, spend three million Rand on Opex and 2 million Rand on Capex. They have made a further commitment to a company in St Helena bay to build them a 2,5 million Rand workboat (fiberglass hull catamaran), which totals to a current financial commitment of roughly 8 million Rand to date. Total projected financial need for the project is budgeted on 40 million Rand, which will be sourced through internal intercompany loans through its shareholders, Viking Fishing and Viking Aquaculture.</p> <p>Molapong has a 25+ % direct BBEE shareholding and is a has a BEE certificated rated level 2. They are required by TNPA to remain at level 4 as a minimum</p> <p>The current model is for harvested fish to be packed on ice and transported to Cape Town, so that the project can focus on the farming side for now. At a later stage they may look at processing locally, which could employ up to 140 permanent jobs.</p> <p>In addition the company currently employs 10 full time people to two dedicated hatcheries producing fish to go to sea, so the total job opportunities in total associated directly with the project would be about 220 at full scale production.</p> <p>Local suppliers and services are already sourced as much as possible. The aquaculture industry in this area should be considered in the broader perspective. Mussel farming is a lot more labour intensive then finfish farming, the estimates from existing projects for the increase in jobs within the ADZ in total is 850 job opportunities. Studies have pointed towards 2500 job opportunities within the same proposed ADZ, but including the land based jobs.</p> <p>The appreciation of the Langebaan Lagoon’s sports and tourist value is borne out in that the applied for areas do not include any of the Lagoon sites and the current experimental site is to be moved further into the harbour and away from approach areas. There will therefore be no aquaculture development in the lagoon, although it would be visible from an elevated height against the backdrop of an industrialised harbor. If the mitigation</p>

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					measures as stated in the BAR are implemented, residents and visitors to the area may consider the project to be congruent with the marine environment and perceived use of Saldanha Bay as a marine development zone (also considering the existing aquaculture operations within the Bay).
31.2.3	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	It is relevant to our objection that the guideline for EIAs from the Department of Environmental Affairs (DEA) states that “[w]hen considering how the development may affect or promote justifiable economic and social development, the relevant spatial plans must be considered, including Municipal Integrated Development Plans (IDP), Spatial Development Frameworks (SDF) and Environmental Management Frameworks (EMF)”. (Pg. 4 DEA (2017), Guideline on Need and Desirability). And further, “[w]hat is needed and desired for a specific area should primarily be strategically and democratically determined beyond the spatial extent of individual EIAs (Pg 7.) It is not evident from the BAR if the socio-economic aspect of the Molapong proposal harmonises with the Integrated Development and Spatial Development Framework specifically for Langebaan, as envisaged by the above guideline.		The South African Cabinet commissioned an economic potential study for the ocean areas off South Africa in 2013 and this indicated that this Ocean sector could significantly increase its GDP contribution to the economy and to job creation. The Aquaculture industry sector was identified as one of the sectors' high potential growth vectors and is included under the National Operation Phakisa development to support the National Development Plan, 2030. The DAFF commissioned a financial feasibility study in 2016 which identified Saldanha and Gansbaai as suitable cage based areas. However, the failed Gansbaai project identified Gansbaai as too exposed whereas the Saldanha experimental project yielded good results promoting interest in expansion and investment. The 2015/16 Saldanha Bay IDP includes Aquaculture as a labor growth industry for promotion. The 2011 Saldanha Bay SDF promotes the growth of alternative agro-sector industries which would include Aquaculture. The proposal moves the experimental farm further away from the Langebaan approach in further consideration of the tourism, aesthetic and water sport aspects considered as high growth sectors in this Lagoon area.
31.3	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	3. Visual Impact Assessment Our comments with regard to the unique, unspoilt attractions of Langebaan, and its obviously visual distinction from Saldanha Bay, as stated in point 3 above, have equal application to our objection to the lack of visual impact assessment in the BAR. It is clear from the Molapong sites and the type of fish farm structure proposed that this development will be highly visible to many residents and visitors on land as well as those who use the lagoon and bays for recreation. Nevertheless, the scope of the BAR conveniently side-steps this responsibility to fully interrogate the visual impact of the proposed development. This material lacuna indicates a lack of appreciation of the unique topography of Langebaan and the value of this appeal to investors and tourists. Currently there are few and immaterial visual disturbances experienced by Langebaan residents from the existing aquaculture operations. The importance of the Cape West Coast Biosphere Reserve and the three Marine Protected Areas in the Langebaan Lagoon are internationally recognised and regulated as areas of high conservation value. The Langebaan lagoon is rated nationally as a “biodiversity hotspot”. The undisturbed natural integrity of these areas is a major	Ecosense	It is not denied that the project would have visual impact. The scale of visual impact of the Molapong project vs the ADZ in full operation must, however, not be confused. The Molapong project would only be a small component of the ADZ area, which has already considered the cumulative visual impact for the ADZ and further increased the distance from shore. A more detailed visual assessment is not considered a further requirement for the Molapong project, which, if the mitigation measures are implemented, residents and visitors to the area may consider the project to be congruent with the marine environment and perceived use of Saldanha Bay as a marine development zone (also considering the existing aquaculture operations within the Bay, and the backdrop of a highly industrialised harbor, iron ore jetty, container ships etc). Mitigation includes spreading mooring grids over two sites as far as possible to avoid larger concentrations of cages, of which the bulk would be more visible. Reducing height of bird net supports and the use of only one low visibility colour on netting (e.g. grey based hues), downward pointing shaded lights and marking of equipment for retrieval purposes. See also Section 5.6.3 and Section 5.6.10 of the EMPr for details.

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			<p>contributor to sense of place and visual quality. Hence, the visual resource value of the residential areas in close proximity to the proposed development is rated as being high. In contrast, much of the town of Saldanha Bay has an industrialised landscape. Whilst the proposed development in Big Bay will be less visible to residents and holidaymakers in the Langebaan town itself, the uninterrupted long-range views that many such residents currently enjoy (e.g. Myburg Park), and the very same lagoon and bay view aesthetics that have attracted them to invest and settle in the area, will be irrevocably impaired by the industrialisation of their outlook. "To maintain and protect the natural character values of the coastal environment fish farming activities should avoid high visual audience areas where close views are gained" (Pg. iii. Natural Character and Visual Impact Assessment of Potential Finfish Farming Development (for the Waikato Regional Council). Bernard Brown Associates Ltd. May 2008) This specialist assessment is supported by the Minister of Environmental Affairs in the Algoa Bay Fish Farm authorisation appeal. The Directorate: Appeals and Legal Review conducted a site visit in 2015 to an existing aquaculture farm in Saldanha and found that "... this facility was situated a long distance from tourist facilities and outside of public scrutiny. In many ways, it is an ideal location for a floating fish farm". (Pg. 7. Clause 4.6.6). The finding clearly recognises the negative visual impact of fish farms and the need to avoid same.</p>		
31.4	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	<p>4. Ecological Impacts We are gravely concerned that the mitigation measures recommended in the BAR do not adequately address the myriad site specific risk potential, especially with regard to (but not limited to) carrying capacity, water contamination, site specific hydrography over time, tide movements and variations of the lagoon and bay system over time, post production rehabilitation, the independence and frequency of oversight management, the bias of experts, scientific uncertainty, lack of quality impact data, biofouling, impacts on local fauna and flora habitats, breeding and migratory paths. However, the timeframes for submission of our objection do not permit a thorough assessment of these important influencers. "The 2011 National Biodiversity assessment indicated that Langebaan, South Africa's only lagoon ecosystem is vulnerable and recommended that this habitat should not be placed under any additional anthropogenic pressure." (Pg. 51 DAFF Strategic</p>	Malopong DAFF Ecosense	<p>The mitigation measures in the BAR have been proposed through careful consideration of available specialist input, consultation with authorities and stakeholders directly involved in the specific concerns raised (such as water quality and birds). Ongoing engagement with these roleplayers have provided opportunity for further consideration of the proposed project with productive input received (refer to notes from meetings with SBWQFT and BirdLife SA, sections 4.2 and 4.3 of the Comments and Responses report). Further engagement with scientists have also resulted in a clearer picture of how mitigation can be implemented successfully, added to it a precautionary approach, which is one of the main principles of NEMA. It is widely published and acknowledged that the Saldanha Bay system, of which the Langebaan Lagoon forms only a part is under environmental stress, hence the precautionary approach. As stated in the State of the Bay report (2016), the development of the Saldanha Bay port has significantly altered the physical structure and hydrodynamics of the Bay, whilst all developments within the area (industrial, residential, tourism etc.) have the potential to negatively impact on ecosystem health.,</p>

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			<p>Environmental Assessment – Identification of Potential Marine ADZ for Fin Fish Cage Culture. October 2011) With this in mind, the scale and type of mitigation factors contained in the BAR to address the identified ecological impact risks of the proposed aquaculture project, are of grave concern. Further, we contend that the probability of proactive and successful implementation of such mitigation measures is unlikely and unfeasible. If the project was to be “phased in”: Given the time scale needed to monitor and assess the site specific ecosystems once operations have commenced, as well as the time scale to effectively address any deterioration in the quality of the site specific ecosystems, the implementation of each phase of the project could only happen over considerable timeframe. How does this impact on the feasibility of the project in its entirety? Further, sea-based aquaculture is a high risk activity in terms of its potential for irreversible negative impact on the environment in which it is based.</p>		<p>Molapong is proposing to increase its production in a staggered way but monitored all the time. If the monitoring shows that there is an increase in the environmental impact the farm will have to change its operational procedures in order to bring the impact within the legal DAFF requirements. Monitoring is specified in the aquaculture permit conditions, which are annually reviewed and issued (see Appendix E to the BAR). Saldanha bay water quality has been monitored by different parties over the past years. Dr Barry Clarke who is involved in the State of the Bay reports was consulted in addition to DAFF scientists. He indicated that nutrient loading from Molapong on its own would not add significantly to the nutrient loading in the Bay. The same cannot be said for DAFFs ADZ which is several orders of magnitude greater. Even the nutrient loading from the ADZ will be difficult to detect through site based monitoring against the high natural background variability (high variability on a weekly basis linked with upwelling events). I would expect to see overall average nutrient levels in the Bay rise relative to historic levels though (see email correspondence in section 4.2). There is always the potential of environmental pollution when it comes to aquaculture but one must monitor and make decisions according to the real data. Sites can be fallowed and rehabilitated. If it becomes evident that a project is not sustainable in Saldanha Bay then it will be removed. DAFF issues a marine right and permits, farms are monitored and environmental control officers that report on the projects. The risk has been shown to be manageable with mitigation and as determined by best current information at the time of assessment. That there can be improvement to underlying data and information source is not disputed. The precautionary principle supporting NEMA is very strongly emphasised in that the conservative estimate for finfish production carrying capacity is some 24600 t (Table 6 of SRK ADZ final BAR within Section A 1 a) D2) and then it further recommends that production is further capped at 15% of the calculated capacity for the bay being approximately 5 150 tpa. Thus with the Molapong application requesting a maximim 2000 t, which equates to less than 40% of an already very conservative 15% estimated carrying capacity. The significant reduction in initial allocations of production clearly shows responsible and precautionary principles being applied to support early detection and if required either modifications to operational management, reduction in biomass, increased fallow requirements, or even curtailment of operations. There is ongoing liaison which included a focus group meeting the minutes of which are included in the submissions. There is further a recommendation that there is an information sharing / monitoring forum established that will continue to add value and distribute information on activities if this application and or the ADZ application process is acceptable. The principle of this forum is included in our submission and the detail of what structure and</p>

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					<p>process this forum will take is left to the parties participating to decide i.e. direct input into and participation by identified groups / I&AP's.</p> <p>The DAFF have committed to sit on this forum if/when implemented.</p> <p>Although the ADZ application and EMP goes to DEA and the Molapong BAR goes to provincial DEA&DP there are strong likelihood that the DEA&DP will ask for delegated authority to DEA so that decision making between the various applications is considered holistically by the DEA for the ADZ and also at individual project level based on the merits of the various applications.</p>
31.4.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	<p>4.1 Monitoring, Compliance and Enforcement</p> <p>It is of particular concern that there currently is an absence of enforceable, clearly elucidated, site and species specific norms and standards for aquaculture farming in South Africa. The sector is governed by various regulatory regimes and various organs of state making the monitoring, compliance and enforcement mechanisms weak. Poor coordination of frameworks poses a high risk of ecological degradation where aquaculture developments are situated. Guidelines exist, but are broad-based, lacking in detail and are not enforceable. There is a paucity of detailed information in the BAR with regard to site specific monitoring systems that meet or exceed best practice international standards. As a result, there is insufficient interrogation of this critical aspect of the BAR which will impact the quality and impartiality of the decision-making process.</p>		<p>The EMPr mitigation measures incorporating the International MOM system monitoring techniques (Modelling-Ongrowing fish farms-Monitoring, which is currently being used by the experimental project and will serve to provide water quality results to the ALF and SBWQFT) and this applicant's intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. The Focus Group meeting and subsequent water quality meeting further support the mitigation and responsible intent to meet best practice.</p> <p>The DAFF and Competent Authority determining process and decision making have been specifically consulted on integration for application considerations including needs for monitoring and adaptive management.</p> <p>The ASC requirements warrant special note here: Farms must meet 100 percent of the requirements to achieve certification. Meeting the full suite of requirements will require farms to have a high level of transparency and regular monitoring of a number of key indicators. The ASC Salmon Standard requires the farm to make some performance data publicly available and other performance data available to the Aquaculture Stewardship Council (ASC) and includes approximately 50 specific reporting requirements.</p> <p>Although the ASC Salmon Standard is creating farm-level requirements, they are intended to help protect and maintain ecosystem function and ecosystem services in salmon-producing areas, with the recognition that aquaculture operations are not solely responsible for total ecosystem health. The ASC Salmon Standard is intended to be revisited and updated periodically (e.g., every three to five years) to ensure that its requirements are based on the best available scientific knowledge and management practices and to encourage continuous improvement (ASC Salmon Standard 2017:12).</p> <p>The culmination of discussions with interested groups and authorities is reflected in the EMPr, section 5.5, which makes it enforceable:</p> <p>The Molapong Project Manager shall be responsible for responding to third party or public queries and/or complaints relating to construction operations and the dissemination of information to the community and the media (press</p>

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					<p>releases etc).</p> <p>The DAFF has committed (Molapong Aquaculture Panel meeting at Protea Hotel, Saldanha on 22 May 2017) to facilitating the establishment of an Aquaculture Liaison Forum (ALF), which would include Molapong as an industry producer.</p> <p>Further we understand that the DEA&DP as the Provincial Environmental Compliance authority will also be actively involved and attend such ALF meetings, which will support confidence to stakeholders and industry that monitoring, compliance and enforcement is being implemented.</p> <p>The intention of the Forum is to ensure that stakeholders have a forum to share information, concerns and monitoring results so that all parties have an opportunity to discuss and take any necessary actions to address such needs as appropriate and within their respective mandates.</p> <p>The structure and agenda has not been made clear at this point by DAFF but Molapong has committed itself and will actively participate in this forum.</p> <p>It is anticipated that this Forum will convene within three months of any permit / authorisation issued regarding this application.</p> <p>The DAFF and the participants invited shall decide the structure, operating process and frequency of meetings and reporting as part of the order of business from the inaugural meeting.</p> <p>Updates shall be made available to stakeholders regarding results of environmental monitoring in the reporting period.</p> <p>It is also significant that Molapong have applied for full membership of the Saldanha Bay Water Quality Forum Trust and have committed to sharing of water quality monitoring results, observations and assisting with the SBWQFT monitoring process for the Bay wide programme. This SBWQFT has a wide interest group of membership which also enhances the communication of information within the Community.</p>
31.4.2.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	<p>4.2 Specific ecological impact concerns</p> <p>4.2.1 Interaction between farmed animals and wild fish: The mitigation measures recommended in the BAR cannot guarantee that there will be no fish escapes and therefore no impact on wild populations. "The probability of fish escaping from traditional aquaculture systems is so large that the FAO (1995) stated that a new species introduced to aquaculture will be seen as a new species introduced to the wild, no matter how secure the system is. There is convincing evidence from literature that farmed fish can have a significant influence on the genetic profile of associated wild populations. Given the paucity of data regarding actual population consequences of escaped farmed fish on wild populations...it seems prudent to treat farmed fish as exotic species with potentially negative</p>	Ecosense DAFF disease expert	<p>There is no guarantee in preventing escapees although it is mitigated and minimised through net materials, inspection protocols and management (See EMPr Appendix H, Sections 5.6.6 and 5.6.12, based on recommendations from risk assessments for King, Coho and Trout in Appendix G to the BAR). Regarding the matter of disease/parasites transfer from the fish in the cages to the wild fish stock. In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project initially farms salmonids and there are no naturally occurring salmonids in the bay. There are no realistic risks and no chance of transfer of the usual external parasites such as Salmon sea lice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages.</p>

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			consequences for wild populations, particularly when the latter are of conservation concern. (Pg. 10. Marine Fish Farming Environmental Impact Information. Marine Finfish Farmer's Association of South Africa (MFFASA) 28 July 2011).		They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation inventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process will mean that there is a low risk. Imported ova are guaranteed disease free, which means the risk of salmonids introducing disease is very low. It is in the best interest of both the commercial grower that produces the ova and the commercial grower that does the on-growing of the fish, to keep their respective countries and facilities disease free.
31.4.2.2	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	4.2.2 Fish Feed: We require a full explanation as to the composition of the feed to be used for the fin fish and the fish-in-fish-out ratio.	Molapong and Ecosense	The feed that is currently used on the experimental farm in Saldanha has a 15% inclusion rate of fishmeal from a sustainable source. It is envisaged to trial out a new diet by the same producer which is 100 % free of marine proteins. Fish meal inclusion from a sustainable source is however only one of the fish feed ingredients that are audited in the ASC certification audit scheme. All ingredients included in the diet, including Soy and Palm oil need to be from certified sustainable sources. Please refer to the ASC standards that have been included as part of the EMPr for implementation by the project. The EMPr specifies feed management in Section 5.6.11
31.4.3	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	Does the proposed ADZ plan to use wild stocks of pelagic fish for feed of the caged stocks? If so, are these wild stocks currently under stress or are they currently harvested by subsistence / small scale fishers? How then does this support a key aim of the proposed ADZ which is to support food security needs?	Ecosense	We are not mandated to respond on behalf of the ADZ applicant.
31.4.4	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	We assert that the Molapong project sites, the scale of proposed farms, the proposed type of farming and type of species farmed will have an untenable deleterious impact on the lagoon and bay systems with minimal potential for ecological rehabilitation. The current mitigation measures recommended in the BAR require a rigorous interrogation as to their site-specific feasibility, and especially in the context of the high ecological value of the lagoon and bay.	Molapong and Ecosense	Ecosense submits that the sites, species, farming method are reasonably considered in terms of this assessment process. A risk adverse and precautionary approach has been demonstrated in the first instance by this application of 2000 t being for less than 40% of the recommended and capped production carrying capacity of 5150 t which in turn is 15% of the total calculated carrying capacity for the bay of approximately 24600 t . This application represents under 8.5% of the total finfish calculated carrying capacity, which will be phased in over 5 years to ensure responsible and measurable decision making based on empirical and observable data. The assessment shows that with mitigation there is reasonable confidence that responsible development of aquaculture within this high ecological area is feasible. The Competent Authority is the judge of the merits of this application and through this rigorous process a decision will be made.
31.4.4	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	The Saldanha Bay Municipality's EMF clearly supports our concerns with regard to foreseeable ecological threats: "Big Bay and Outer Bay form part of "Zone 2 – Be Careful" identified in the EMF, as Big Bay is deemed important from a marine ecological perspective, which is deemed likely to increase in	Ecosense	The EMF holds draft status at the time of drafting and has not been formally adopted from the final draft of Feb 2015. The zoning of the areas is acknowledged and the Zone 2 indicated Aquaculture consideration - development with care. The monitoring included in the MOM and ASC standards will include dispersion data and if required further modeling. The

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			importance. Aquaculture is listed as an activity that could be considered for public interest reasons but are likely to have significant negative impacts (scale dependent) in Zone 2”.		mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. It is the EAP's opinion that the mitigation and monitoring will be effective in illuminating early detection and effective reaction management for any significant negative effects. The application's risk adverse and precautionary approach in relation to bay / ADZ carrying capacity and the phased increase in production over 5 years to ensure responsible management adaption against monitoring results do not validate a high risk rating if implemented, i.e. development with care.
31.5.1	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	In conclusion: As a result of noted unacceptably high risks of irreversible ecological damage, associated with “limits of current knowledge” and too many gaps and inconsistencies in the scientific data, the precautionary principle must apply, as mandated in section 24 of the Constitution and Section 2(4)(a)(vii) NEMA, which requires a risk-averse and cautious approach. This legal requirement therefore demands further wider and a far more rigorous enquiry into the risks acknowledged in the BAR, without which any decision-making process with regard to an environmental authorization will be procedurally and substantively flawed.	Ecosense	The discussion at the Focus Group meeting also revealed that the DAFF experience and expertise and opinions differ from the SBWQFT which has resulted in further technical discussion taking place with them – see sections 4.1 and 4.2. Dr Barry Clarke (from Anchor Environmental and with extensive involvement in the State of the Bay reporting) indicated that nutrient loading from Molapong on its own would not add significantly to the nutrient loading in the Bay, although the same cannot be said for DAFFs ADZ which is several orders of magnitude greater. Even the nutrient loading from the ADZ will be difficult to detect through site based monitoring against the high natural background variability (high variability on a weekly basis linked with upwelling events) (see email correspondence in section 4.2). In that there is relatively low technical / empirical data on cage culture of salmonids in the South African coastal waters and in the Western Cape in particular, this application has certainly encouraged the need to apply the precautionary principal as envisaged in section 24 of the Constitution and Section 2(4)(a)(vii) NEMA, which requires a risk-averse and cautious approach. It can be contended that this application for approximate 8% of the total calculated carrying capacity, phased over a five year period to enable empirical data to be gathered to support any decisions forward, conforms to such approach. The current data sets in the experimental phase for 50 t show low measurable variants (refer to Appendix G of the BAR for examples of data sets).The EMPr mitigation measures incorporating the International MOM monitoring techniques and this applicant's intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. Furthermore, the enabling Government agent for the industry being DAFF has affirmed their responsibility and commitment to ensure implementation of monitoring and enforcement required and has affirmed that they are accountable for such and committed to facilitating the

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					<p>establishment of an Aquaculture Liaison Forum (ALF), which would include Molapong as an industry producer.</p> <p>Community relations will enjoy a distinct place in the EMP to ensure implementation of mitigation. Section 5.5 refers:</p> <p>The Molapong Project Manager shall be responsible for responding to third party or public queries and/or complaints relating to construction operations and the dissemination of information to the community and the media (press releases etc).</p> <p>Further we understand that the DEA&DP as the Provincial Environmental Compliance department will also be actively involved and attend such ALF meetings, which will support confidence to stakeholders and industry that monitoring, compliance and enforcement is being implemented.</p> <p>The intention of the Forum is to ensure that stakeholders have a forum to share information, concerns and monitoring results so that all parties have an opportunity to discuss and take any necessary actions to address such needs as appropriate and within their respective mandates.</p> <p>The structure and agenda has not been made clear at this point by DAFF but Molapong has committed itself and will actively participate in this forum. It is anticipated that this Forum will convene within three months of any permit / authorisation issued regarding this application.</p> <p>The DAFF and the participants invited shall decide the structure, operating process and frequency of meetings and reporting as part of the order of business from the inaugural meeting.</p> <p>Updates shall be made available to stakeholders regarding results of environmental monitoring in the reporting period.</p> <p>It is also significant that Molapong have applied for full membership of the Saldanha Bay Water Quality Forum Trust and have committed to sharing of water quality monitoring results, observations and assisting with the SBWQFT monitoring process for the Bay wide programme. This SBWQFT has a wide interest group of membership which also enhances the communication of information within the Community.</p>
31.5.2	Save Langebaan Lagoon Action Group Jennifer Kamerman	21/04/2017	We trust that Molapong Aquaculture / Ecosense will apply its mind to our Letter of Objection in full compliance with and in support of the tenets of administrative justice. Please note that all current members of Save the Langebaan Action Group (SLL) are registered I&As and further, that all current members have given SLL proxy to represent them in this objection (proof of letters of proxy on request). Please ensure that all correspondence with regard to the Molapong aquaculture project is emailed to savelangebaanlagoon@gmail.com	Ecosense	<p>The commitment to supporting and participation of local aquaculture liaison and monitoring forums further demonstrates responsible and committed management. The annual permitting requirements ensure further that timeous compliance must be met by any proponent.</p> <p>The offer to submit the proof of proxy for all the then current members (of at least 1000 as noted elsewhere) was not received.</p>
32	BirdLife South Africa Christina	21/04/2017	Please register BirdLife South Africa as an I&AP for the above project	Ecosense	Registered. Please also see notes from meeting with BirdLife South Africa in section 4.3. At this meeting, it was noted that the main concerns in the

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	Hagen				submission had been addressed, mainly due to the fact that the company is aiming to produce an ASC certified product.
32.1.1	BirdLife South Africa Christina Hagen	21/04/2017	BirdLife South Africa supports the development of sustainable aquaculture if it removes some of the pressure on wild fish stocks. However, many parts of the South African coastline are not suited to all types of aquaculture (especially caged finfish farming). Concerns regarding choice of locations Saldanha Bay and Langebaan Lagoon are ecologically important areas and contain several marine protected areas, an international Important Bird and Biodiversity Area and a Ramsar site. It is also part of the West Coast Biosphere Reserve. The three islands in the bay – Jutten, Malgas and Marcus - are important breeding areas for 11 species of seabirds (three of which are Endangered, and one Vulnerable) and host nearly 80 000 seabirds.	Ecosense	Noted and bird and related activities will be observed and recorded for adaptive management discussions. There are recommendations for inclusive forums for the industry where such interests and groups can liaise and participate in recommendations forward.
32.1.2	BirdLife South Africa Christina Hagen	21/04/2017	The lagoon is an important breeding and spawning area for commercially important fish species. The adjacent wetland is critically important for several endangered migratory wader species and regularly holds more than 20 000 waterbirds at a time. South Africa, being a signatory to the Convention on Migratory Species and African-Eurasian Waterbird Agreement, is required to protect sites such as the Langebaan Lagoon, which are important to migratory species (See below for a list of globally and regionally threatened, and congregatory bird species that occur in the area).	Ecosense	Acknowledged. Monitoring and observation recording shall include birdlife interactions and these will be made available through the channels provided. There is a recommendation that an aquaculture industry forum be established where all interested parties can liaise and discuss matters of interest or concern. The DAFF have supported this and further clarification can be found in the focus group proceedings included in section 4.1.
32.1.3	BirdLife South Africa Christina Hagen	21/04/2017	The area adjacent to Jutten Island is within 400 m of the island, which is a Marine Protected Area and hosts breeding populations of several seabirds. If the project goes ahead, we would recommend a larger buffer zone be in place around the island.		Noted. Siting of precincts to avoid MPAs, and implementation of a buffer zone between an MPA and an adjacent precinct will mitigate impacts to some extent. However, as seabirds forage over a wide area there is no universal mitigation feasible or possible other than the no-project alternative. The recommended buffer around Jutten MPA is 250m (Marine Ecology report for the ADZ, 2016:66, 77).
32.1.4	BirdLife South Africa Christina Hagen	21/04/2017	We also have concerns regarding the accumulation of chemicals and heavy metals, fish feed, medication and excreta around the sites near the mouth of the Langebaan Lagoon.	Ecosense	Note that the Molapong site will not be near the mouth of the lagoon. The phased approach to increasing production over at least 5 years supports the early detection of potential impact issues. The mitigation measures discussed and specified in the EMPr and ASC standards as well as the very conservative stocking density caps in relation to the bay wide estimated carrying capacity will give good margins of safety to overexploitation. Application of anti-fouling paint and cleaning of nets would be done on land. There are further recommendations for industry wide liaison and monitoring committee, which DAFF has indicated is going to be implemented. There is also commitment from DAFF to ensure authority oversight and accountability in relation to ensuring monitoring and implementation of both permit conditions and approved specifications. See also EMPr, including the ASC

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					standards in Appendix H to the BAR and proceedings of the Focus group meeting of 22 May and further discussions with the SBWQFT and BirdLife South Africa in section 4.1-4.3 of the Comments and Responses Report, Appendix F to the BAR.
32.1.5	BirdLife South Africa Christina Hagen	21/04/2017	The report does not include an analysis of the flow of currents within the bay to indicate where the potential pollutants would likely to be dispersed. If they disperse into the Langebaan Lagoon, there is the potential to negatively affect the sensitive ecosystem within the lagoon through changes in nutrient levels and water chemistry.		The existing information indicated strong tidal exchange and the influence of effluent dispersion in the existing trial phase also indicated extremely low effects. The monitoring included in the MOM (Modelling-Ongrowing fish farms-Monitoring, which is currently being used by the experimental project and will serve to provide water quality results to the ALF and SBWQFT) and ASC standards (currently the highest international standard for ensuring responsible aquaculture), will include dispersion data and if required further modeling. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. The discussion at the Focus Group meeting of 22 May also revealed that the DAFF experience and expertise and opinions differ from the SBWQFT which has resulted in further technical discussion taking place with them. The proceedings of the Focus Group meeting and the SBWQFT meeting are included in section 4.1-4.2. It is the EAP's opinion that the mitigation and monitoring will be effective in illuminating early detection and effective reaction management for any significant negative effects.
32.2.1	BirdLife South Africa Christina Hagen	21/04/2017	Impacts on seabirds The most concerning impact on seabirds is indirectly through the subsidization of seabird predators. The fish farm could inadvertently provide year-long food subsidies for seabird predators (e.g. Cape fur seals and Kelp gulls), attracting them to the site in large numbers and therefore making seabirds more vulnerable to predation. Both Cape fur seals and Kelp Gulls are known predators of seabirds and already have a significant impact on seabird numbers in Saldanha Bay. This issue is not brought up explicitly in the BAR and should be considered in further reports. Mitigation measures that are suggested are to "Keep a log of all cetaceans, seabirds and predators recorded in the vicinity of fish farms, including behavioural observations." without indicating what action should be taken if adverse interactions are observed.	Ecosense / Molapong	It must be noted that to date there have been no breaches of predators into the cages during the trial phase, however inspection protocols for cages and infrastructure as well as observation returns at these and feeding times make allowance for reporting of seabird predators, see 5.6.9 and 5.6.12 of the EMPr, Appendix H to the BAR. Specification 5.6.9 notes that marine animal observations should be reported to relevant experts for analysis. One interaction in two years was recorded being with a seal during the daily mortality removal in a cage. The diver picked up a dead fish from the net bottom and a seal tried to grab it from the outside of the net. The seal was unsuccessful due to the fact that the net material used is a Dynema fibre, which is extremely strong. There have been no incidents of birds getting tangled in the nets. No entanglements of predators such as seals or dolphins. The type of net used is called DYNEMA, which is strong and does not allow any predators to break into the cage net. At the moment, the bird interaction has been with some Kelp gulls and a few Hartlaub gulls that hang around the cages, waiting for a fish pellets to float outside the net.
32.2.2	BirdLife South Africa Christina Hagen	21/04/2017	Organophosphate products used to control sea lice in farmed salmon have had an impact on seabirds elsewhere, especially cormorants, due to their neurotoxic nature. Bird behaviour can be altered, which can be detrimental to breeding success. In	Ecosense / Kevin Christson (DAFF)	Organophosphates are not used to treat sea lice infestation. The DAFF specialist on diseases clearly stated during the focus group meeting that the sea lice that has such a negative impact on salmon farming overseas is not present in South Africa. All treatments must be covered under the

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			order to prevent bird interactions, protective screens should be used over and around the cage nets.		supervision/ directive of a Veterinary Professional and documented in accordance with the Animal Diseases Act 35 of 1984.
32.3.1	BirdLife South Africa Christina Hagen	21/04/2017	Other considerations The South African coast is notorious for rough sea conditions. Fish farms have failed in Gansbaai and elsewhere in the past due to cage breakages (Hutchings et al. 2011). The rough sea conditions increase the chances of fish escaping from the cages, which is considered “routine” even in countries with calmer waters (Coho Risk Assessment- Appendix G). The mitigation measures for reducing the changes of escape listed in Appendix G are not mentioned in the main report.	Ecosense	The Procedure in section 5.6.6 in the EMPr (Appendix H to the BAR) for escapee management has been updated with the mitigation measures as stipulated in the risk assessments.
32.3.2	BirdLife South Africa Christina Hagen	21/04/2017	Antifouling is another practical issue to consider in Saldanha Bay. Existing mussel farms in the bay experience extremely high bio-fouling rates (Anchor Environmental – Saldanha Bay and Langebaan Lagoon: State of the Bay 2011). The application of anti-fouling agents can have significant environmental impacts. Manual cleaning as an alternative can be time and cost intensive, which may reduce the frequency at which the nets are cleaned, increasing the likelihood of damage or breaking of nets.	Molapong	The net is treated with an antifouling paint, this is done at a net making company in St Helena bay on shore. The net cleaning also takes place there on land. The antifouling has been relatively effective on the nets during the trial period and the frequency and biomass for cleaning is reduced significantly The copper based emulsion used to treat the nets is part of the monitoring program to assess the leaching rate of the copper. This is done by suspending oysters next to the cage and comparing the analyzed results with those with the results from the control site in Big bay. Results show only localised leaching and nil at the control sites (see Appendix G to the BAR with monitoring results). Mussel spat will naturally settle on the anchor lines and as they grow are hand stripped, collected and given to the mussel farm. Large volumes can be experienced at times.
32.3.3	BirdLife South Africa Christina Hagen	21/04/2017	The lagoon is also home to a large number of species of indigenous fish, which would be vulnerable to disease or parasite transfer from farmed fish.	Molapong /	Importation of Salmonid ova is regulated through the Animal Diseases Act 35 of 1984, which stipulates that all animals imported into South Africa, need to have the following documentation. 1) There needs to be an agreement between the exporting and the importing country on the specific disease free certification and testing protocol, prior to any import permit being issued. The exporting country needs to issue a health certificate in which it states that the Ova are free of OIE listed diseases. This needs to be signed by the regulating authorities (usually a state veterinarian) upon a final inspection of the ova. 2) Upon arrival of the ova in South Africa, the State veterinarian checks both the import and export original health certification and makes sure they comply. 3) A sample is then taken by the state veterinarian and send for disease testing by Onderstepoort Veterinary Institute. The ova are then moved to an approved and DAFF registered hatchery where they are hatched, but kept in quarantine until the batch receives the final clearance from the state veterinarian, based on the results from Onderstepoort Laboratory. 4) It is through this rigorous sampling and testing protocol, both at the

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				DAFF Disease Specialist Kevin Christson	<p>exporting country and in South Africa, that our country has been kept free of any OEI listed diseases that affect salmonids. It is in the best interest of both the commercial grower that produces the ova and the commercial grower that does the ongrowing of the fish, to keep their respective countries and facilities disease free.</p> <p>5) Unfortunately, the pet trade is currently not very well regulated and the diseases that have entered our country have been brought in via the koi trade (Koi Herpes Virus KHV) and wild fish moving down from our neighbouring countries such as Mozambique and Botswana due to global warming in cases such as Tilapia and Catfish.</p> <p>Trout and salmon eggs get tested when leaving the country of origin and once they arrive in South Africa, they get tested again and placed under quarantine until the results are negative for OIE listed diseases typically those viral diseases associated with salmonids. Salt water is very good at removing parasites in fresh water fish and he thinks that the smoltification process where are transferred from fresh water to salt water in the cages will be healthy get rid of any possible parasites the fish may have. He states that he does not think that there is a risk of introduction alien diseases into the country by the project. Regarding the matter of disease/parasites transfer from the fish in the cages to the wild fish stock. In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project farms salmonids and there are no naturally occurring salmonids in the bay. There are no realistic risks and no chance of transfer of the usual external parasites such as Salmon sea lice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages. They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation inventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process will mean that there is a low risk.</p>
32.4.1	BirdLife South Africa Christina Hagen	21/04/2017	Specific comments on the report Page 25: The answer to the question "How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/natural environment)?" is given as "The area forms part of a harbour and the site will not be located within any sensitive area." However, the BGIS maps provided in	Ecosense	<p>The Molapong sites are located within the Port of Saldanha, which is demarcated by the TNPA – hence the necessity for a lease application to obtain sea space.</p> <p>You are, however, correct in pointing out the biodiversity status of the area – this has been corrected in the BAR.</p> <p>The preferred site for the Molapong project in Big Bay is located</p>

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			Appendix D of the BAR, shows that the proposed sites are within Endangered and Vulnerable ecosystems. There is also no mention of the highly sensitive Langebaan Lagoon very close to the proposed aquaculture sites.		approximately 2.8km from the Langebaan Lagoon MPA border within which the Langebaan lagoon is situated. The current test site, which is located closer to this area will be phased out and moved to the preferred site.
32.4.2	BirdLife South Africa Christina Hagen	21/04/2017	Similarly on Page 31, the answer to the question “Will the development have an impact on any populations of threatened plant or animal species, and/or on any habitat that may contain a unique signature of plant or animal species?” is “No”. There is no mention of the Langebaan Lagoon and the important role it plays as a nursery for several fish species and as a migration stopover for many thousands of birds.	Ecosense	Acknowledged and revised. Although the project would not be located in the lagoon, there could be impact, although negligible (refer to statement from Dr Barry Clark, section 4.2 of the Comments and Responses Report). The Lagoon has been identified as an Important Bird area (IBA). The Lagoon is therefore important and the monitoring, reporting and enforcement is considered key to the development of a responsible and ecological sustainable industry for all parties and interests.
32.4.3	BirdLife South Africa Christina Hagen	21/04/2017	The report states that there are existing experimental fish farms in Saldanha Bay. It would be useful in evaluating the impacts of increasing the footprint of aquaculture within the Bay if an impact report from the existing structures were available.	Ecosense	The focus group Meeting proceedings do reflect relevant observations and results from monitoring of the experimental phase of Molapong. There are also further discussions specifically on water quality issues and recommendations for continued participation by interest groups. Actual results from the experimental project have been included under Appendix G of the BAR.
32.4.4	BirdLife South Africa Christina Hagen	21/04/2017	A suggested alternative activity is an on-shore recirculation aquaculture system (pg. 28). This alternative is dismissed as too expensive and with a high carbon footprint. However no references or data are presented to support this claim.	Ecosense	The energy inputs and use of resources to build and maintain such a recirculation facility is by its design and nature environmentally less acceptable. Pumps, water use and waste treatment as well as temperature and lighting controls are obvious issues and costs. Although feed conversion in closed systems can be better the energy consumption (and associated carbon footprint) in conversion and lifecycle can be higher. A study by Aubin et al was used as reference (full reference in BAR), which compared freshwater raceways, sea cages and inland recirculation systems. The re-circulation system was a high energy-consumer compared to the raceway system (four times higher) and the sea cage system (five times higher).
32.5.1	BirdLife South Africa Christina Hagen	21/04/2017	Conclusion Sea-base aquaculture needs to be developed and implemented sustainably, taking all environmental risks into consideration. This report in our opinion fails to take into account all the environmental risks. Birdlife South Africa is not in favour of sea-based aquaculture on South Africa’s exposed shoreline, especially not in an area adjacent to marine protected areas, as is the case for Saldanha Bay.	Ecosense	The risk identification and assessment criteria and outcomes are detailed in the report - The mitigation and monitoring is included in the EMPr. We contend that the risks identified and mitigation and monitoring protocols submitted will allow for sustainable development and maintain ecological risks to reasonable levels which can be evaluated and management adapted or curtailed. Note that the mariculture permits are annually renewed and adverse impact reaction and mitigation enforcement are reasonably available. The potential positions and alternatives are based on production and species requirements, which are then assessed against ecological aspects and impacts. Mitigation measures regarding site selection are considered and contained in the BAR and EMPr. The status of these areas is acknowledged.
32.5.2	BirdLife South Africa Christina	21/04/2017	Finfish farming in particular is relatively untested in South Africa, and carries many potential risks to wild fish populations in terms	Molapong /	That finfish farming in the sea in South Africa is relatively new is correct. However, importation of Salmonid ova is regulated through the Animal

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	Hagen		of diseases, as well as to marine mammals, seabirds and benthic organisms.	DAFF Disease Specialist Kevin Christson	<p>Diseases Act 35 of 1984, which stipulates that all animals imported into South Africa, need to have the following documentation:</p> <p>1) There needs to be an agreement between the exporting and the importing country on the specific disease free certification and testing protocol, prior to any import permit being issued. The exporting country needs to issue a health certificate in which it states that the Ova are free of OIE listed diseases. This needs to be signed by the regulating authorities (usually a state veterinarian) upon a final inspection of the ova.</p> <p>2) Upon arrival of the ova in South Africa, the State veterinarian checks both the import and export original health certification and makes sure they comply. 3) A sample is then taken by the state veterinarian and send for disease testing by Onderstepoort Veterinary Institute. The ova are then moved to an approved and DAFF registered hatchery where they are hatched, but kept in quarantine until the batch receives the final clearance from the state veterinarian, based on the results from Onderstepoort Laboratory.</p> <p>4) It is through this rigorous sampling and testing protocol, both at the exporting country and in South Africa, that our country has been kept free of any OEI listed diseases that affect salmonids. It is in the best interest of both the commercial grower that produces the ova and the commercial grower that does the ongrowing of the fish, to keep their respective countries and facilities disease free.</p> <p>5) Unfortunately, the pet trade is currently not very well regulated and the diseases that have entered our country have been brought in via the koi trade (Koi Herpes Virus KHV) and wild fish moving down from our neighbouring countries such as Mozambique and Botswana due to global warming in cases such as Tilapia and Catfish.</p> <p>Trout and salmon eggs get tested when leaving the country of origin and once they arrive in South Africa, they get tested again and placed under quarantine until the results are negative for OIE listed diseases typically those viral diseases associated with salmonids. Salt water is very good at removing parasites in fresh water fish and he thinks that the smoltification process where are transferred from fresh water to salt water in the cages will be healthy get rid of any possible parasites the fish may have. He states that he does not think that there is a risk of introduction alien diseases into the country by the project. Regarding the matter of disease/parasites transfer from the fish in the cages to the wild fish stock. In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project farms salmonids and there are no naturally occurring salmonids in the bay. There are no realistic risks and no chance of</p>

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					transfer of the usual external parasites such as Salmon sea lice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages. They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation inventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process will mean that there is a low risk.
33	DAFF: Sustainable Aquaculture Management Michelle Pretorius	10/04/2017	Please note that the DAFF: Sustainable Aquaculture Management have reviewed the BAR released in March 2017 and have no further comments to add as concerns have been addressed in the current report which were highlighted in the pre application report.	Ecosense	Noted.
34	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	The Chief Directorate: Integrated Coastal Management in the Oceans and Coasts Branch of the Department of Environmental Affairs values the opportunity to comment on the Draft Basic Assessment Report. The Oceans and Coasts Branch has no objection to the proposed Molapong Salmonid Aquaculture Project in Saldahna Bay in the Western Cape Province by Molapong provided that the issues highlighted in this document are addressed. The Department has identified sections and issues that need to be considered in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (ICM Act) that are summarised below:	Ecosense	Noted.
34.1.1	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	A dispersion model simulating the dispersion rate of organic matter from the net cage taking into account the stock density, feed type, species tolerance levels, waste, waves, wind direction and other relevant local environmental conditions must be developed to inform mitigation measures in the environmental management plan.	Ecosense	A monitoring forum for the industry is recommended in the EMPr and would incorporate all stakeholders including the SBWQFT to further develop and monitor those aspects of potential impacts that may influence environmental health or other interest group activities (see section 5.5 of the EMPr, Appendix H to the BAR). A model such as that indicated could and is likely to be considered by such a group which will also include DAFF and the DEA&DP / DEA:ICM being invited.
34.1.2	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	Mapping of the benthic environment must be done in order to show species distribution and types and their ability to assimilate increased organic matter from the net cages.	Ecosense	The monitoring regimes and mitigation requirements in the EMPr including MOM (Modelling-Ongrowing fish farms-Monitoring, which is currently being used by the experimental project and will serve to provide water quality results to the ALF and SBWQFT), ASC (highest international aquaculture standard) and any further specifications incorporate Benthic recording assessments.
34.1.3	DEA: Integrated	04/04/2017	Literature with the regional Species distribution must be taken	Ecosense	This has been screened in relation to the species being proposed for

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	Coastal Management		into consideration in order to get an understanding of what species are likely to be impacted on by the different activities of the proposed development.		production. The monitoring potential at a bay wide and industry level will also assist in determining trends or impacts which may or may not be as a direct result of aquaculture facilities.
34.2	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	Organic matter including food waste, faeces, medicine and chemicals used in the cleaning of the nets will eventually deposit and accumulating on the benthic environment likely resulting in dissolved oxygen levels. Proper environmental monitoring and adaptive management practice of the benthic environment under the net cages must be implemented in order to ensure that sediment build up is detect on time.	Ecosense	Furthermore the enabling Government agent for the industry being DAFF has affirmed their responsibility and commitment to ensure implementing the monitoring and enforcement required and has asserted that they are accountable for such. The commitment to supporting and participation of local aquaculture liaison and monitoring forums further demonstrates responsible and committed management. The annual mariculture permitting requirements ensure further that timeous compliance must be met by any proponent.
34.3	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	In developing the management plan, an understanding of the objectives and purpose of the MPA must be established in order to come up with mitigation measures that will not affect the purpose of the MPA, conservation status and its ecological functionality. Therefore the study must take into consideration the function and purpose of the MPA and how the operation of the proposed development during different phases will impact on it.	Ecosense	The potential positions and alternatives are based on production and species requirements which are then assessed against ecological aspects and impacts. Mitigation measures regarding site selection and mitigation measures are considered and contained in the BAR and EMPr. The status of these areas is acknowledged. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation if successful. The Focus Group meeting and subsequent water quality meeting further support the mitigation and responsible intent to meet best practice. The DAFF and Competent Authorities determining process and decision making have been specifically consulted on integration for application considerations including needs for monitoring and adaptive management.
34.4	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	Disease transfer from the farmed species to wild species is likely to spread and therefore a disease management plan must be implemented. Medicine and related chemicals must only be applied under supervision and prescription from a qualified Veterinarian.	Molapong	Importation of Salmonid ova is regulated through Animal Diseases Act 35 of 1984, which stipulates that all animals imported into South Africa, need to have the following documentation. 1) There needs to be an agreement between the exporting and the importing country on the specific disease free certification and testing protocol, prior to any import permit being issued. The exporting country needs to issue a health certificate in which it states that the Ova are free of OIE listed diseases. This needs to be signed by the regulating authorities (usually a state veterinarian) upon a final inspection of the ova. 2) Upon arrival of the ova in South Africa, the State veterinarian checks both the import and export original health certification and makes sure they comply. 3) A sample is then taken by the state veterinarian and sent for disease testing by Onderstepoort Veterinary Institute. The ova are then moved to an approved and DAFF registered hatchery where they are hatched, but kept in quarantine until the batch receives the final clearance from the state veterinarian, based on the results from Onderstepoort Laboratory. 4) It is through this rigorous sampling and testing protocol, both at the exporting country and in South Africa, that our country has been kept free of

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				DAFF Disease Specialist Kevin Christson	<p>any OEI listed diseases that affect salmonids. It is in the best interest of both the commercial grower that produces the ova and the commercial grower that does the on-growing of the fish, to keep their respective countries and facilities disease free.</p> <p>5) Unfortunately, the pet trade is currently not very well regulated and the diseases that have entered our country have been brought in via the koi trade (Koi Herpes Virus KHV) and wild fish moving down from our neighbouring countries such as Mozambique and Botswana due to global warming in cases such as Tilapia and Catfish.</p> <p>Trout and salmon eggs get tested when leaving the country of origin and once they arrive in South Africa, they get tested again and placed under quarantine until the results are negative for OIE listed diseases typically those viral diseases associated with salmonids. Salt water is very good at removing parasites in fresh water fish and he thinks that the smoltification process where are transferred from fresh water to salt water in the cages will be healthy get rid of any possible parasites the fish may have. He states that he does not think that there is a risk of introduction alien diseases into the country by the project. Regarding the matter of disease/parasites transfer from the fish in the cages to the wild fish stock. In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project farms salmonids and there are no naturally occurring salmonids in the bay. There are no realistic risks and no chance of transfer of the usual external parasites such as Salmon sea lice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages. They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation interventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process will mean that there is a low risk.</p>
34.5	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	The potential risk of escapes is likely and the farmed species being exotic in nature is likely to have no natural predator and since some species will escape from the cages or during the transfer of species ,that will poses a risk on the distribution and abundance of local species that will have to compete with them for food and territorial survival. Therefore is a need to investigate further the impacts that the species will have to the	Ecosense	It is unlikely that escapees will assimilate to the external environment in terms of habitat and food competition. Salmonids do not occur in these waters. There is a reasonable abundance of predatory fish which would predate on escapees. The farmed fish are only familiar with pelletized feed sources. There however is not much documented information regarding these aspects in waters that do not naturally support salmonid species.

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			indigenous species (population, breeding, disease, maturity and the possibility of the mating with them in order to develop mitigation measures.	DAFF disease expert	In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project initially farms salmonids and there are no naturally occurring salmonids in the bay. There are no realistic risks and no chance of transfer of the usual external parasites such as Salmon sea lice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages. They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation inventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process will mean that there is a low risk.
34.6	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	To minimise or even eliminate the risk of species mating with local species, it is recommended that farmed species must be sterilized or selectively chosen as such that the risk of the establishment of a self-sustaining of the species population in the area will be minimised.	Ecosense	There are no salmonid species occurring naturally in the area. The vast majority of ova imported or hatched for farming are currently monosex.
34.7	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	During transfer, 10% mortality rate is expected and such waste must therefore be immediately disposed of at licensed disposal facilities. Clarity must be given on whether the mortality is expected during the transfer phase or post transfer of the species. Frequent monitoring and maintenance of the net cages is essential to ensure that Entanglement of species by net cages is immediately attended to and relevant measures are taken.	Molapong	It should be noted that although initially assumed as high as 10 %, the trial project has managed to get this mortality rate down to less than 1 % over the past 2 years. This as a result of improved transfer equipment and protocols, as well as staff experience and species specific requirements. Mortalities are removed very frequently: any surface carcasses are removed when seen and during feeding times. Divers inspect the cages very frequently as the weather permits to inspect / repair and remove and mortalities that have sunk to the net base. All mortalities are removed whole and transported to an existing fish meal and composting facility for responsible disposal. Mortality records are kept in detail. No entanglements have been recorded or observed during the trial period as the net designs are such that this is precluded / minimised. There are monitoring and reporting procedures for any such occurrence if encountered.
34.8	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	Frequent water sampling must be undertaken and the samples must be taken for analysis at an accredited analysis Centre.	Ecosense	The EMP mitigation measures incorporating the International MOM monitoring techniques and this applicants intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment. The ASC standard requires weekly water samples to be taken, which the company has committed to. The email from Barry Clark however does state that this probably won't pick up anything significant (see section 4.2). The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past

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					authorisation. See OEMP Annexure 1 (Molapong monitoring protocol) and 4 (ASC Standards) for reference.
34.9	DEA: Integrated Coastal Management Moses Ramakulukusha	04/04/2017	Kindly note that the Department reserves the right to revise its initial comments and may request further information based on any additional information that may come to light. You are therefore advised to submit any future development proposals or amendments to the current proposal for the attention of the Director: Coastal Conservation Strategies via the address provided below. This should include both hard and electronic copies.	Ecosense	Noted.
35	SAHRA Lesa le Grange	21/04/2017	The applicant seeks statutory comment on the Draft Basic Assessment Report (DBAR) for the proposed Molapong sea-based Aquaculture Project. The proposed location for the installation of sea-based aquaculture infrastructure is in Big Bay North, Saldanha Bay, West Coast, Western Cape. The DBAR was distributed to relevant authorities in September 2016, however, it should be noted that SAHRA did not receive the document at this time. The DBAR was first uploaded to the relevant application on SAHRIS in March 2017. SAHRA thanks the applicant for the opportunity to comment on the DBAR. The following points must be taken into consideration and incorporated in the Final Basic Assessment Report:	Ecosense	Noted
35.1	SAHRA Lesa le Grange	21/04/2017	1. Mooring of mussel long lines and sea cages must be positioned in a way which avoids damage and/or disturbance of cultural heritage material.	Ecosense	The areas considered and applied for are away from any identified heritage material. The wrecks known and in bay area have detailed co-ordinates and the anchor points and lines are well away from such points. Divers will pre-inspect anchor points for evidence of any heritage materials. See section 5.6.3 of the EMPr.
35.2	SAHRA Lesa le Grange	21/04/2017	2. The proposed locations of the mooring blocks must be subjected to comprehensive geophysical survey, and divers must be deployed to conduct sea-bed inspections at each locality.	Ecosense	The areas considered and applied for are away from any identified heritage material. The wrecks known and in bay area have detailed co-ordinates and the anchor points and lines are well away from such points. Divers will pre-inspect anchor points for evidence of any heritage materials. See section 5.6.3 of the EMPr.
35.3	SAHRA Lesa le Grange	21/04/2017	3. Should any shipwreck or cultural heritage material be detected in the development area via the geophysical survey, diver inspection, or other means, the position must be recorded, and the area must be excluded from the list of proposed mooring block locations. SAHRA must be notified immediately AND work must cease and may not commence until feedback has been received from SAHRA. Under no circumstance may mooring blocks be placed on any shipwreck site which is proven or suspected to be older than 60 years.	Ecosense	Divers will pre-inspect anchor points for evidence of any heritage materials. See section 5.6.3 of the EMPr.
35.4	SAHRA Lesa le	21/04/2017	4. Should any shipwreck site or associated material be in danger	Ecosense	See section 5.6.3 of the EMPr.

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	Grange		of damage and/or disturbance, a permit application will be required.		
35.5	SAHRA Lesa le Grange	21/04/2017	5. All documentation relevant to the proposed Molapong Aquaculture Project must be uploaded to SAHRIS.	Ecosense	Documents and application outcomes will be uploaded as previously.
36	SBWQFT Christo van Wyk	19/04/2016	Attached please find the SBWQFT's formal response with regards to the current EIA for the proposed Aquaculture Development Zone. Our fear with regard to the ADZ will be the same for your specific project and are relevant and should be incorporated in your EIA process.	Ecosense	The Molapong project is not at the same scale as the ADZ and will be implemented over a shorter period of time. It will also follow strict monitoring protocols in order to detect impacts and act accordingly. The Molapong project takes cognisance of the finding of the ADZ studies.
36.1	SBWQFT Christo van Wyk	19/04/2017	The SBWQFT concerns are summarized on page 25 of your BA. The waste under the cages, (nitrogen flux) eutrophication (especially in the upper lagoon) and change in benthic population are real threats to our already impacted eco-system. Page 25: <text image extract page 25 of BAR>	Ecosense	The existing information indicated strong tidal exchange and the influence of effluent dispersion in the existing trial phase also indicated extremely low effects. The monitoring included in the MOM and ASC standards will include dispersion data and if required further modeling. The MOM, or Modelling-Ongrowing fish farms-Monitoring, which is currently being used by the experimental project and will serve to provide water quality results to the ALF and SBWQFT. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. The discussion at the Focus Group meeting also revealed that the DAFF experience and expertise and opinions differ from the SBWQFT which has resulted in further technical discussion taking place with them. The minutes of the Focus Group meeting and the SBWQFT meeting are included in section 4.1-4.2. The culmination of these discussions led to agreement and alignment of monitoring protocols, while participants expressed satisfaction that the intent for co-operative engagement and commitment to share results and observations would add value into the monitoring of the bay and that data would be scientifically valuable and useful for the longer term benefit of all users. It is the EAP's opinion that the mitigation and monitoring will be effective in illuminating early detection and effective reaction management for any significant negative effects.
36.2.1	SBWQFT Christo van Wyk	19/04/2017	Your BA stated that NO impacts will occur on CBA – the Environmental Management Framework (DEADP doc) indicated Big Bay and Lagoon as sensitive areas and that limited or no development be authorized in these areas. The status of the EMF should be checked, not sure if it is already approved by DEADP.	Ecosense	The EMF holds draft status at the time of drafting and has not been formally adopted from the final draft of Feb 2015. The zoning of the areas is acknowledged and the Zone 2 indicated Aquaculture consideration - development with care.
36.2.2	SBWQFT Christo van Wyk	19/04/2017	Point 3 on page 31 state that there will be no impact on animal species, and/or any habitat –this is not true, fin fish will have a negative impact on marine habitat and resident species like the White Stumpnose and could pose a threat to endangered resident Waders and other species, should eutrophication occur and these species' food security be compromised. Page 31: <text image extract page 31 of BAR>	Molapong / Ecosense	One interaction in two years was recorded being with a seal during the daily mortality removal in a cage. The diver picked up a dead fish from the net bottom and a seal tried to grab it from the outside of the net. The seal was unsuccessful due to the fact that the net material used is a Dynema fibre, which is extremely strong. The report has been revised to reflect the concern, should eutrophication occur, which is unlikely as stated by Dr Clarke – see email in section 4.2.

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
36.3.1	SBWQFT Christo van Wyk	19/04/2017	Also please see our written objection to fin fish farming (attached) and the risks thereof to the Lagoon and Big Bay system with regards to the ADZ. Your risk assessment ratings are very low if you take into consideration the sensitive marine environment you are proposing to impact upon with fin fish farming.	Ecosense	The risks in the context of the ADZ must be sought in the relevant ADZ reports. The rational for the ratings are described in the various assessments.
36.3.2	SBWQFT Christo van Wyk	19/04/2017	Impacts (most probably detrimental) on resident fish species like the White Stumpnose, benthic environment, which is food source for endangered bird species, water pollution that could well due to nutrient enrichment cause eutrophication should be high to very high, it could be detrimental to the upper lagoon area of Geelbek.		In that there is relatively low technical / empirical data on cage culture of salmonids in the South African coastal waters and in the Western Cape in particular, this application has certainly recognised the need to apply the precautionary principal as envisaged in section 24 of the Constitution and Section 2(4)(a)(vii) of NEMA, which requires a risk-averse and cautious approach. This application is for 2000 t. The theoretical estimate for finfish production carrying capacity in the Bay area is some 24 600 t calculated from the Nitrogen N loads for the bay which is an international accepted provision (Table 6 of SRK ADZ final BAR within Section A 1 a) D2) There has then been a recommendation through DAFF to initially cap finfish allocatable production to 15% of this theoretical calculated capacity and this brings the figure to approximately 5 150 t pa. The application is for 2000 t p.a. being less than 40% of what is already a precautionary total allocation. Ecosense therefore submits that this approximate 8.1% application more than supports a risk averse and cautious approach. This is further supported by a 5 year phased approach to this maximum 2000 t p.a. to enable empirical data to be gathered to support any decisions forward. The current data sets in the experimental phase for 50 t show extremely low measurable variants. The EMPr mitigation measures incorporating the International MOM monitoring techniques and this applicants intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. Furthermore the enabling Government agent for the industry being DAFF has affirmed their responsibility and commitment to ensure implementing the monitoring and enforcement required and has affirmed that they are accountable for such. The commitment to supporting and participation of local aquaculture liaison and monitoring forums further demonstrates responsible and committed management. The annual permitting requirements ensure further that timeous compliance must be met by any proponent.
36.3.3	SBWQFT Christo van Wyk	19/04/2017	The current movement from Big Bay to Lagoon should be verified, this will determine the “speed” and risk of moving the nutrients from fish farming areas into the sensitive lagoon system. These waters in the upper lagoon are low in nutrients	Ecosense	The existing information indicated strong tidal exchange and the influence of effluent dispersion in the existing trial phase also indicated extremely low affects. The monitoring included in the MOM and ASC standards will include dispersion data and if required further modeling. The mitigation

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			and are higher in temperature and are the “perfect storm” for eutrophication.		recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. The discussion at the Focus Group meeting also revealed that the DAFF experience and expertise and opinions differ from the SBWQFT which has resulted in further technical discussion taking place with them. The proceedings of the Focus Group meeting and the SBWQFT meeting are included in section 4.2. It is the EAP's opinion that the mitigation and monitoring will be effective in illuminating early detection and effective reaction management for any significant negative effects for the Molapong project, especially since there is a strong intent for co-operative engagement and commitment to share results and observations would add value into the monitoring of the bay and that data would be scientifically valuable and useful for the longer term benefit of all users (refer to SBWQFT meeting notes and follow-up email correspondence, section 4.2.
36.3.4	SBWQFT Christo van Wyk	19/04/2017	This area homes various endangered bird species that are dependent on the specific benthic community that currently exist for their food source. Historic studies indicated that there is a direct link between Geelbek area and Small and Big Bay – historic dredging events clearly impacted negatively on seaweed footprint in the upper lagoon, it is anticipated that nutrients from the proposed farms will be also be “moved” to the upper lagoon due to current movement. (Huge risk) Page 32: <text image extract page 32 of BAR>	Grant Pritcher DAFF	We consider the observations of “discoloured” water in Langebaan Lagoon, following dredging in Saldanha Bay, to support the supposition that the exchange between the two systems is dominated by surface waters; i.e. only following dredging when fine particles are re-suspended into surface waters are discoloured waters observed in Langebaan Lagoon. It is not denied that there is no link between the bay and lagoon.
36.4	SBWQFT Christo van Wyk	19/04/2017	As per your BA page 51, the risk of disease, especially to resident species like the White Stumpnose should render any fin fish farms in this sensitive lagoon system out and any such developments should not be considered, areas outside the Bay should be considered for these type of operations with high risk potential. Page 51: text image extract page 51 of BAR>	Molapong	Importation of Salmonid ova is regulated through the Animal Diseases Act 35 of 1984, which stipulates that all animals imported into South Africa, need to have the following documentation: 1) There needs to be an agreement between the exporting and the importing country on the specific disease free certification and testing protocol, prior to any import permit being issued. The exporting country needs to issue a health certificate in which it states that the Ova are free of OIE listed diseases. This needs to be signed by the regulating authorities (usually a state veterinarian) upon a final inspection of the ova. 2) Upon arrival of the ova in South Africa, the State veterinarian checks both the import and export original health certification and makes sure they comply. 3) A sample is then taken by the state veterinarian and send for disease testing by Onderstepoort Veterinary Institute. The ova are then moved to an approved and DAFF registered hatchery where they are hatched, but kept in quarantine until the batch receives the final clearance from the state veterinarian, based on the results from Onderstepoort Laboratory. 4) It is through this rigorous sampling and testing protocol, both at the exporting country and in South Africa, that our country has been kept free of

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				DAFF Disease Specialist Kevin Christson	<p>any OEI listed diseases that affect salmonids. It is in the best interest of both the commercial grower that produces the ova and the commercial grower that does the on-growing of the fish, to keep their respective countries and facilities disease free.</p> <p>5) Unfortunately, the pet trade is currently not very well regulated and the diseases that have entered our country have been brought in via the koi trade (Koi Herpes Virus KHV) and wild fish moving down from our neighbouring countries such as Mozambique and Botswana due to global warming in cases such as Tilapia and Catfish.</p> <p>Trout and salmon eggs get tested when leaving the country of origin and once they arrive in South Africa, they get tested again and placed under quarantine until the results are negative for OIE listed diseases typically those viral diseases associated with salmonids. Salt water is very good at removing parasites in fresh water fish and he thinks that the smoltification process where are transferred from fresh water to salt water in the cages will be healthy get rid of any possible parasites the fish may have. He states that he does not think that there is a risk of introduction alien diseases into the country by the project. Regarding the matter of disease/parasites transfer from the fish in the cages to the wild fish stock. In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project farms salmonids and there are no naturally occurring salmonids in the bay. There are no realistic risks and no chance of transfer of the usual external parasites such as Salmon sea lice as these do not naturally occurring in the environment. There will be some opportunistic parasites that can have a broader host range that may be able to establish themselves in the cages. They are however generally seen as production related diseases and due to the ongoing monitoring and veterinary care, mitigation interventions can take place to keep the parasite load low. It's unrealistic to expect any type of farming to be disease free, but the risks to the environment being that we are dealing with a host that does not naturally occur in the environment and the smoltification process will mean that there is a low risk.</p>
36.5	SBWQFT Christo van Wyk	19/04/2017	In general your BA does not take into consideration the accumulative impacts of the proposed fin fish and other aquaculture projects that are envisaged. This project cannot be evaluated on its own, but the total impacts of all aquaculture farms should be taken into consideration.	Ecosense	<p>In that there is relatively low technical / empirical data on cage culture of salmonids in the South African coastal waters and in the Western Cape in particular this application has certainly recognised the need to apply the precautionary principle as envisaged in section 24 of the Constitution and Section 2(4)(a)(vii) NEMA, which requires a risk-averse and cautious approach. This application is for 2000 t.</p> <p>The ADZ's theoretical estimate for finfish production carrying capacity in the</p>

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					<p>Bay area is some 24 600 t calculated from the Nitrogen N loads for the bay which is an international accepted provision (Table 6 of SRK ADZ final BAR within Section A 1 a) D2) There has then been a recommendation through DAFF to initially cap finfish allocatable production to 15% of this theoretical calculated capacity and this brings the figure to approximately 5 150 tpa. The application is for 2000 t p.a. being less than 40% of what is already a conservative total allocate. Ecosense therefore submits that this approximate 8.1% application more than supports a risk averse and cautious approach. This is further supported by a 5 year phased approach to this maximum 2000 t p.a. to enable empirical data to be gathered to support any decisions forward. The current data sets in the experimental phase for 50 t show extremely low measurable variants.</p> <p>There is better data on bivalves and calculations by Probyn for the entire ADZ area have a range of approximately 4600t and 15 200t (current production in the industry here is approximately 2000 t p.a. There is reasonable scope for expansion.</p>
36.6.1	SBWQFT Christo van Wyk	19/04/2017	The SBWQFT is in favour of aquaculture projects like mussels and oysters that requires a good water quality, but the size of the total production unit should be weighed against the Bay's assimilative ecological carrying capacity and food production. .	Ecosense	<p>See response under 36.5.</p> <p>Mussel culture will be used next to the cages to mitigate nutrient loading from finfish.</p> <p>The EMPr mitigation measures incorporating the International MOM monitoring techniques and this applicants intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation.</p> <p>Molapong has been accepted as a member of the SBWQFT which would further ensure implementation of monitoring, as well as sharing and comparison of data (see email correspondence in section 4.2)</p>
36.6.2	SBWQFT Christo van Wyk	19/04/2017	The SBWQFT is of the opinion that fin fish production should be banned in total from the bay due to the high risk of these types of industry to enclosed marine ecosystems, taking into consideration that the Bay is already under stress. Fin Fish production should be located in open marine areas such as St. Helena Bay or further North or on on-land units where effluent could be treated such as the projects that is under way north of the Berg River mouth	Ecosense	<p>The South African Cabinet commissioned an economic potential study for the ocean areas off South Africa in 2013 and this indicated that this Ocean sector could significantly increase its GDP contribution to the economy and to job creation. The Aquaculture industry sector was identified as one of the sectors high potential growth vectors and is included under the National Operation Phakisa development to support the NDP 2030. The DAFF commissioned a financial feasibility in 2016 identified Saldanha and Gansbaai as suitable cage based areas however the failed Gansbaai project identified Gansbaai as too exposed whereas the Saldanha experimental project yielded good results pro ting interest in expansion and investment.</p> <p>The 2015/16 Saldanha Bay IDP includes Aquaculture as a labor growth industry for promotion.</p> <p>The 2011 Saldanha Bay SDF promotes the growth of alternative agro-sector</p>

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					industries which would include Aquaculture. The risk is shown to be manageable with mitigation and as determined by best current information at the time of assessment. That there can be improvement to underlying data and information source is not disputed. However and in fact the precautionary principle is very strongly emphasised in that the conservative estimate for finfish production carrying capacity calculated for the bay is some 24 600 t (Table 6 of SRK ADZ final BAR within Section A 1 a) D2) and then recommends that production is conservatively capped at an initial 15% of the capacity being approximately 5 150 t pa. Thus with this application requesting a maximum 2000 t it equates to less than 10% of the calculated carrying capacity.
37	WCDM Doretha Kotze	20/04/2017	Attached please find the West Coast District Municipality's comments on the Draft BAR for the Molapong Aquaculture proposal. The letter has also been mailed to your postal address. I refer to your electronic communication dated 20 March 2017 and the Draft BAR for the proposal.	Ecosense	Noted and acknowledged.
37.1	WCDM Doretha Kotze	20/04/2017	The West Coast District Municipality is concerned about the proposed expansion of aquaculture in Saldanha Bay as it may have a negative impact on tourism and recreational activities, as well as the water quality in the bay and Langebaan Lagoon.	Ecosense	The existing information indicated strong tidal exchange and the influence of waste dispersion in the existing trial phase also indicated extremely low affects. The monitoring included in the MOM (Modelling-Ongrowing fish farms-Monitoring, which is currently being used by the experimental project and will serve to provide water quality results to the ALF and SBWQFT) and ASC standards (highest international standards for aquaculture) will include dispersion data and if required further modeling. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. The discussion at the Focus Group meeting also revealed that the DAFF experience and expertise and opinions differ from the SBWQFT which has resulted in further technical discussion taking place with them. The minutes of the Focus Group meeting and the WQ meeting are reflected in the supporting documentation. It is the EAP's opinion that the mitigation and monitoring will be effective in illuminating early detection and effective reaction management for any significant negative effects.
37.2	WCDM Doretha Kotze	20/04/2017	The Aquaculture Development Zone BAR, currently being drafted by SRK Consulting, indicates an area in Big Bay North for future expansion of aquaculture in Saldanha Bay. Alternative 3 of Molapong indicates an area in this vicinity, but from the maps provided it does appear as if the Molapong Alternative 3 Big Bay North area is situated outside or exceeds the proposed Big Bay North ADZ area.	Ecosense	The ADZ final BAR includes the preferred Malopong area into the ADZ zoning. There has been consensus at departmental levels that DEA will consider all the applications together and therefore it is anticipated that an integrated approach to any authorisations and conditions determined will be possible.
37.3	WCDM Doretha Kotze	20/04/2017	However, the Big Bay area proposed in Alternative 3 is considered more suitable than the Big Bay Areas proposed for Alternatives 1 and 2. The latter two areas will definitely be in	Ecosense	Noted - The proposal moves the experimental farm further away from the Langebaan approach in further consideration of the tourism, aesthetic and water sport aspects considered as high growth sectors in this Lagoon area.

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			conflict with other users.		
37.4	WCDM Doretha Kotze	20/04/2018	The WCDM has no objection to the area proposed to the north of Jutten Island in Alternative 3.	Ecosense	Noted.
38.1	People agains Aquaculture in Saldanha (PAAS) Andre Pretorius	26/04/2017	I must strongly object to the advertised new sites for fish farming in the Big Bay North area and Juten Island area for Molapong Aquaculture dated 16 March 2017.	Ecosense	Noted but without specifics there is no response.
38.2	PAAS Andre Pretorius	26/04/2017	These are new sites or expansion of existing and also part of the recent Aquaculture applications for the Saldanha Bay and therefore cannot be handled separately from that process. The initial EA was not successful for these sites as the BAR and EMPs was incomplete and public objections were numerous.	Ecosense	The Malopong application is a legally entitled standalone application and must be processed as such. However, there are synergies of impact and mitigation with the ADZ application which shall where possible be addressed accordingly. This is evident in the recent focus group meeting (to which you were invited) where DAFF as the ADZ proponent was present as well as DAFF specialists being part of the expert panel. The initial BAR process is ongoing and as far as we are aware at the time of comment/ reply there has been no issuing of an EA to the ADZ. The DAFF and DEA have also indicated that the DEA&DP will ask for a delegated authority to DEA so that decision making between the various applications is considered holistically by DEA for the ADZ but also at a project level based on the merits of the various applications.
38.3.1	PAAS Andre Pretorius	26/04/2017	What is more the currently leased activities of fish farming as a pilot project did not go through the prescribed public participation process or an approved BAR and EA.	Ecosense	It was not required to undertake such as the activities were below the thresholds for application.
38.3.2	PAAS Andre Pretorius	26/04/2017	Additionally, empirical studies of the pollution effect were not published after this project. This indicates that the current activities are in fact unlawful.	Ecosense	All monitoring and reporting during the pilot phase have been in accordance with and reported to the competent authority as required. Monitoring has indicated very low measurable pollution levels that can be attributed to fish farming – See extracts of results in Appendix G to the BAR.
38.4	PAAS Andre Pretorius	26/04/2017	This is simply an attempt to separate their application from the other sites and an approval constitutes a breach of regulations.	Ecosense	There is no breach of Regulations identified - this applicants process started before the ADZ process and is for specific rights to farm as an extension of their experimental phase.
38.5	PAAS Andre Pretorius	26/04/2017	These areas are especially eco-sensitive and can not be threatened by fish farming activities which are highly polluting.	Ecosense	All monitoring and reporting during the pilot phase have been in accordance with and reported to the competent authority as required. Monitoring has indicated very low measurable pollution levels that can be attributed to fish farming.
38.6	PAAS Andre Pretorius	26/04/2017	Effectively this will create a dead zone to other indigenous fish and marine life in the Big Bay North as it lies directly on the inflow current to the bay. Additionally, this will effectively block the entrance of whale and dolphins trying to enter the bay.	Ecosense	There is no relevant evidence for this conjecture but it is noted and will be determined in the mitigation / monitoring measures envisaged. The existing information indicated strong tidal exchange and the influence of effluent dispersion in the existing trial phase also indicated extremely low affects. The monitoring included in the MOM (Modelling-Ongrowing fish farms-Monitoring, which is currently being used by the experimental project and will serve to provide water quality results to the ALF and SBWQFT) and ASC standards (highest international standards for aquaculture) will include

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
					dispersion data and if required further modeling. The mitigation recommendations also support regular liaison with all roleplayers and effectively furthers the participation process past authorisation. The discussion at the Focus Group meeting also revealed that the DAFF experience and expertise and opinions differ from the SBWQFT which has resulted in further technical discussion taking place with them. The proceedings of the Focus Group meeting and the SBWQFT meeting are included in section 4.1-4.2 of the Comments and Responses Report, Appendix F to the BAR. It is the EAP's opinion that the mitigation and monitoring will be effective in illuminating early detection and effective reaction management for any significant negative effects.
38.7	PAAS Andre Pretorius	26/04/2017	Fish farming have been banned in numerous countries from inshore bay areas to offshore locations only.	Ecosense	Noted but without specifics there is no response.
38.8.1	PAAS Andre Pretorius	26/04/2017	What is most disturbing is that it is directly next to an declared marine protected area (SAS Saldanha conservation area and the Saldanha crayfish protected area).	Ecosense	Only one of the proposed areas for Molapong is immediately next to a marine protected area - the Jutten Island MPA. According to the Saldanha Bay municipality's SDF, there is no formally protected Saldanha crayfish protected area and the SAS Saldanha conservation area is located at Cape Colombine, which is not close to any of the proposed farm sites for Molapong. The potential positions and alternatives are based on production and species requirements which are then assessed against ecological aspects and impacts. Mitigation measures regarding site selection and mitigation measures are considered and contained in the BAR and EMPr.
38.9	PAAS Andre Pretorius	26/04/2017	In view of this it is my contention that the existing and intended expansion is unlawful and should be ceased.	Ecosense	The process required has been considered by the responsible authorities during the preparation and draft phases. The facilitating authority in DAFF has also been privy to information and documentation available. The Lease Holder has sight of the documentation as a registered I&AP. There is no substantiated indication or contention that such application is unlawful from these sources. The EAP has further screened this contention as best we can and states without prejudice that no substantiated indications for this being unlawful were apparent.
39	SBWQFT Christo van Wyk	06/06/2017	The SBWQFT would like to respond to the open day that was held on 22 May 2017 at the Protea Hotel, Saldanha as part of the Molapong EIA. Thanks you for the opportunity to raise our concerns about finfish farming in Langebaan Lagoon on that day as well as earlier in the EIA process.	Ecosense	Email response: I hereby acknowledge receipt of your email and will respond formally in the context of the Molapong application when we next make a report available for comment. Your and other IAP comments at the focus group meeting were duly noted and will form part of the proceedings, which will be included in our report. Additional response: Additional comments are noted. We also refer to further discussions with yourself and Dr Barry Clark at a meeting held on 27 June, the notes and further email correspondence, which has been included in section 4.2 of the comments and responses report, Appendix F to the BAR.

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39.1	SBWQFT Christo van Wyk	06/06/2017	<p>I would like to respond to a scientific “answer” that were given on the day re the SBWQFT’s concern that the Nitrogen Flux and organic debri arising from the Finfish farms would reach the Upper Lagoon and could create an environment where eutrophication could occur in this sensitive area of the Lagoon. It was mentioned by DAFF scientist that the Lagoon water layer is stratified and that the “upper” water would not mix with the “lower” colder waters and therefor currents will not be able to flush the nitrogen rich debri from underneath the finfish cages and around these farms into the upper Lagoon.</p> <p>I have bounced this idea off our scientists and please see our scientific response, we used current data to proof our point. This is Dr Barry Clarck’s response:</p> <p>“Hi Christo. My 5c as follows.... I think DAFF is over simplifying things for their convenience. Our temperature monitoring data (see below) and that which has been collected historically (see SOB report) shows very clearly that the Bay is not stratified at all in Winter (May-Sep – big yellow circle on the graph below) as evidenced by the lack of separation between the temperature at different depths (different coloured lines – blue is surface, green mid water, red is bottom) on the graph below. Stratification (evident where there is a big separation between the various coloured lines on the graph below) also breaks down completely at intervals during spring/summer/autumn (once or twice per month – small yellow circles on the graph below – where red and blue lines are close together). These are the “overturning events that Pedro refers too. Furthermore, much of the detritus that accumulates on the substratum below the cages will be mobilised (resuspended into the water column) in winter when waves are typically larger when there is no stratification in the water column which means this material can easily be transported directly into the lagoon by tidal currents! Regards, Barry</p> <p><image of water temperature at varying depths – see copy of comment included in section 6></p>	Grant Pritcher DAFF	<p>Response to email by Christo van Wyk (Saldanha Bay Water Quality Forum Trust) The intention of my contribution relating to the hydrodynamics of Saldanha Bay and Langebaan Lagoon was to demonstrate that the exchange of water between the two systems is dominated by surface waters and that the mechanism of exchange substantially limits the flow of bay bottom water into Langebaan Lagoon. Consequently, because finfish operations are most likely to impact bay bottom waters, the mechanism of exchange will significantly reduce any impact of fish farming on Langebaan Lagoon. The mechanism of exchange between the two systems is detailed in the publication by Monteiro and Largier (1999) in the section aptly entitled <i>Decoupling of Saldanha Bay and Langebaan ecosystems</i>. The implication of this mechanism of exchange is that Langebaan Lagoon is dominated by oligotrophic optically clear waters (borne out by observation). I made it very clear that this mechanism of exchange operates under stratified conditions which dominate for much of the year but are broken down during winter. Nevertheless, as is evident from the work of Smith and Pitcher (2015) the period of winter mixing is limited to around 3 months of the year (supported by the unpublished observations of Clark). The “breakdowns” in stratification referred to by Clark during spring, summer and autumn are a function of the coastal upwelling-downwelling cycle and the outflow of cold bottom water from the bay (as is evident from the considerable warming of bottom waters). These events are not driven by mixing and are less likely to re-suspend bottom deposits into surface waters (upper 5m).</p> <p>With reference to specific comments by Mr van Wyk: “I mentioned that during dredging events we picked up that Small Bay activities had a negative influence of seaweed beds in the upper lagoon, thus proof that there is interaction between the lagoon and Big and Small bay. DAFF then uttered the comment that during dredging mixing of the water columns takes place, but that at fish farms it is not the case, can you believe this bull”. We consider the observations of “discoloured” water in Langebaan Lagoon, following dredging in Saldanha Bay, to support the supposition that the exchange between the two systems is dominated by surface waters; i.e. only following dredging when fine particles are re-suspended into surface waters are discoloured waters observed in Langebaan Lagoon. At no stage did I suggest that there was no “interaction” between the bay and lagoon.</p> <p>“I have bounced this idea off our scientists and please see our scientific response, we used current data to proof our point”. I see no reference to current data to prove any point (only temperature data).</p> <p>“It was mentioned by DAFF scientist that the Lagoon water layer is stratified and that the “upper” water would not mix with the “lower” colder waters....”I did not state that “the Lagoon water layer is stratified” – only the bay water – this is fundamental to understanding the mechanism of exchange between the two systems.</p>

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					References Monteiro PMS and JL Largier. 1999. Thermal Stratification in Saldanha Bay (South Africa) and Subtidal, Density-driven Exchange with the Coastal Waters of the Benguela Upwelling System. <i>Estuarine, Coastal and Shelf Science</i> 49, 877–890. Smith ME and GC Pitcher 2015 Saldanha Bay, South Africa I: the use of ocean colour remote sensing to assess phytoplankton biomass. <i>African Journal of Marine Science</i> 2015: 1–10. G.C. PITCHER
39.2	SBWQFT Christo van Wyk	06/06/2017	The SBWQFT hereby request that our comments be part of the minutes of the open day.	Ecosense	Your comments made at the Focus Group meeting of 22 May have been included in the proceedings; your comments here have been included in the comments and responses report.
39.3	SBWQFT Christo van Wyk	06/06/2017	We are not in agreement with DAFF about the influence of nitrogen arising from finfish farming to the sensitive Lagoon system. The SBWQFT, based on scientific monitoring results, is of the opinion that finfish farming can and will have a negative effect on the Langebaan Lagoon.	Ecosense	It is agreed that finfish farming can have an influence on the Lagoon. However, as per Dr Clarke’s later contention, he is under the impression that nutrient loading from Molapong on its own will not add significantly to the nutrient loading in the Bay (see copy of email correspondence in section 4.2).
39.4	SBWQFT Christo van Wyk	06/06/2017	We would request the minister to determine before finfish farming is allowed, critical environmental criteria (specific limits on specific parameters) to allow for a stop farming scenario should the environment be compromised. The environmental system is already compromised and under stress, the question is how much more can we allow this system to deteriorate. The risk is high with Finfish farming.	Ecosense	The precautionary approach is being taken. In that there is relatively low technical / empirical data on cage culture of salmonids in the South African coastal waters and in the Western Cape in particular, this application has certainly encouraged the need to apply the precautionary principal as envisaged in section 24 of the Constitution and Section 2(4)(a)(vii) NEMA, which requires a risk-averse and cautious approach. It can be contended that this application for approximate 8% of the total calculated carrying capacity, phased over a five year period to enable imperial data to be gathered to support any decisions forward, conforms to such approach. The current data sets in the experimental phase for 50 t show 110low measurable variants (refer to Appendix E of the BAR for examples of data sets).The EMPr mitigation measures incorporating the International MOM monitoring techniques and this applicant’s intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment. Furthermore, it has been agreed that Molapong become an official member of the SBWQFT – see email correspondence in section 4.2b.
			<p>From: Christo [mailto:metsal@imagnet.co.za] Sent: 06 June 2017 09:19 AM To: 'Barry Clark' Cc: Inge Frost; Kruger, Andre Subject: FW: Water monitoring / Fish cages / DAFF / IS THIS LEGAL/ Ethical Importance: High</p> <p>Hi Barry I attended an EIA open day for the Molopong Fishfarm where the whole DAFF team, Trevor Probyn and others, were present.</p>	Ecosense	Note that the complete email thread has been included here to provide context to the response by Mr Pritcher above.

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			<p>My fear of the nitrogen flux ending up in the Lagoon where nullified, with an argument that the bay is stratified in layers and that the currents will not take the nitrogen rich debri from the fish farms up into the lagoon.</p> <p>I will include all Inge’s mails for background.</p> <p>What is your opinion, on these stratified layers. I can recall that Pedro did some work way back, which included a section where he mentioned that the water column “turns over or flips” (this is my wording) at some times during the seasonal cycles.</p> <p>I cannot believe that this argument from DAFF can hold water, the currents must take this nitrogen rich debri into the lagoon. I mentioned that during dredging events we picked up that Small Bay activities had a negative influence of seaweed beds in the upper lagoon, thus proof that there is interaction between the lagoon and Big and Small bay. DAFF then uttered the comment that during dredging mixing of the water columns takes place, but that at fish farms it is not the case, can you believe this bull. The fish will stay calm and will not disturb the water column in the nets and the currents is not strong enough to sweep this mugg from beneath the fish cages to the upper Lagoon.</p> <p>Your opinion would be very appreciative.</p> <p>Groete / Regards Christo van Wyk Saldanha Bay Water Quality Forum Trust Telephone: (022) 714 3367 Cell: 082- 376 8529 E-mail: metsal@imagnet.co.za</p> <p>From: Inge Frost [mailto:inge@treecycle.co.za] Sent: Monday, 05 June 2017 7:08 PM To: 'Christo'; 'Clifford Wright'; 'Jennifer Kamerman' Subject: Water monitoring / Fish cages / DAFF / IS THIS LEGAL/ Ethical Importance: High</p> <p>Hi Christo and Jennifer and Clifford I was looking at final bar attachments, at the Ecosense meeting the man from DAFF stressed that the currents etc are not a problem due to the “ inversion layer “ caused by the</p>		

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
			<p>temperature differences.</p> <p>There argument was that the waste and fecal matter and bacteria etc should not “ float “ around or up toward the lagoon . Also see Andrea from DAFF comments on Fokus : go to time slot 6:08 and watch until end of Christo’s comments. You tube link : https://www.youtube.com/watch?v=qlkm_4XJXMI</p> <p>Why then does this report from Cap Marine say :</p> <p>1)That the monitoring could not be done due to the current / traps could not be kept in place !!!</p> <p>2) Also DAFF said the trails were granted by DAFF of a permit requiring Specific monitoring ! So if they could not provide the MOM method results, what monitoring results did they provide / if any. Are their monitoring methods acceptable to DAFF ?</p> <p>Christo do you know of any results they have supplied , are we aloud to request copies of these results ?</p> <p>Will the FinFish farming be permitted to proceed / expand without quantified results ?</p> <p>http://www.srk.co.za/sites/default/files/File/South-Africa/publicDocuments/Saldanha_Bay/May_2017/499020_Saldanha_ADZ_Final_BAR_App_D1_PD_Report.pdf</p> <p>Page 49 of report / page 50 of PDF – Cap Marine Environmental report Revised / see below (I copied and pasted) Information available The spatial separation (bivalves, cage culture etc.) of aquaculture activities was based on broad consultation with the current aquaculture industry and many other interested and affected parties. These consultations included discussions regarding the areas for fish farming, in particular farming for salmon and trout, for which trials with cages were already under way in Big Bay. Historically trials using fish in cages in Outer Bay north were also considered pertinent although the outcome of those trails was largely negative due to anoxic water conditions (target species was both Salmon and endemic species). The trials on salmon in Big Bay were also based on the granting by DAFF of a permit requiring specific monitoring. Information on the monitoring was not provided to</p>		

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			<p>CapMarine or SRK other than that the MOM methodology had not been effective as the currents in Big Bay had resulted in difficulties in following this approach (net traps under the cages could not be kept in place due to the current). Similarly, the information from other aquaculture activities in South Africa e.g. Algoa Bay, Mossel Bay and Richards Bay, provided no direct information that could inform the carrying capacity and ramp up of fish farming in Saldanha Bay. Saldanha Bay is a semi-closed Bay abutting both marine protected areas and large scale industrial activities with anthropogenic impacts (ore jetty, fish factories, sewage). In addition, reports on some current initiatives to develop fish cage culture were reviewed, specifically in the context of determining the potential carrying capacity of fish cage culture in Saldanha Bay. These included the report by Hecht (2016), the monitoring of fish culture cages in Algoa Bay (Nel and Winter, 2009), and the "Final marine specialist report for marine aquaculture development zones for finfish cage culture in the Eastern Cape" undertaken by (Anchor Environmental), 2013 as well as the "aquaculture</p> <p>Kind regards Inge Frost 082 3388950</p>		
40	John Van der Vyfer	19/06/2017	<p>Could I please register as an I&AP in the evaluation of the MOLAPONG scheme, ref # 16/3/3/1/F4/17/3014/17.</p>	Ecosense	Registered
			<p>I primarily listed 6 categories of both objection and non viability of the project ass jeopardizing existing water tourism revenues, existing long standing rights in these water and water safety. (these are listed below) In addition I would like to add these current updates.</p> <p>Note many of these issues we believe make both proposed aquaculture and fish farming initiatives not viable when considered with current rights, safety and current sustainable green water tourism, the biggest revenue generator for the region.</p>	Ecosense	It is assumed that you are referring to the comments submitted to the ADZ application, of which we have had sight. Please note that our responses are made in context of the Molapong application.
			<p>1. I would like to re register and re affirm these points. Both in that I believe they need to read with and considered in this matter but also based on my experience, deep knowledge of the area of more than 40 years in the water there and 20 years in sustainable business in the area, I believe are very relevant to the arriving at a balanced and correct decision.</p>	Ecosense	Noted. You have been registered for the Molapong application.

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			2. I would also like to highlight that over the last 10 months, many of these issues raised have proved both relevant and mutually exclusive to a safe and viable project :	Ecosense	Noted.
			<ul style="list-style-type: none"> We have had recent storms and significant infrastructure has broken free and floated un marked over the lagoon waters. Craft and water users hitting this both risk material and personal safety and risk of injury. The pilot or evaluation farm is liable for this and any consequential damage, but in reality can't manage this effectively and will accelerate over time as gear wears out. In short this both impinges on existing rights and any significant accident, physical injury/death or damage to property will be laid at the aqua farm as rightly or wrongly basic negligence. This point was high lighted and has now been proven. 	Molapong / Ecosense	The equipment that broke free did not belong to Molapong. The structures (6 cages) withstood the 30 year storm of June 2017. The EMPr specifies strict procedures to avoid such incidents with reporting protocols, including branding of equipment to determine who it belongs to. Please refer to EMPr section 5.6.2 for waste management, 5.6.3 for infrastructure and equipment management (including regular maintenance) and 5.6.12 whereby all incidents should be reported. Note that the EMPr also requires the establishment of a liaison forum, which would provide the public with a mechanism to report such incidents.
			<ul style="list-style-type: none"> The recent down wind dash saw very high winds and significant equipment had to be abandoned as rescuers could not reach participants by virtue of the in water structures. 	Ecosense	The pilot project will be transferred to the new areas being applied for, as described in the alternatives section of the report (refer to Section E of the BAR). The new location would be outside the major recreational users routes, including the Downwind Dash.
			<ul style="list-style-type: none"> In the Mykonos yacht race several yachts sailed into unmarked and unlit infrastructure as they approached the finish near Club Mykonos. 	Ecosense	The area that the cages are in has been indicated on navigational charts for many years (SAN 1011 Date 30/11/1977 and 30/11/1984) as an aquaculture area. Marine notices were also given out. Cages are lit up and have radar reflectors on. Should incidents of this nature occur it should be reported to SAMSA.
			<p>The other factors that we should not loose sight of :</p> <ol style="list-style-type: none"> We have never had a major shark attack in the area. Fish farms change both the time sharks hang around but also their nature and they become more opportunistic. With an apex predator this has a very increased risk to water users. We have seen 2 major cases round the world backed up by marine biologists which ascribe the increased shark presence and change in behavior/aggression to fish farms. A similar analogy is cage diving where this practice and attracting sharks to boats and people have changed sharks behavior and attitude to people and boats. Should an attack happen it would danger tourism materially, look at Reunion island and other venues where it takes years for tourists to return and feel safe to enjoy the waters again. 	Ecosense	<p>The Molapong cages are visited daily and no predator interaction, other than one seal trying to grab a dead fish on the bottom of a cage has been observed.</p> <p>The EMPr provides for monitoring of such interactions through keeping a log of all cetaceans, seabirds and predators recorded in the vicinity of fish farms, including behavioural observations. Marine animal observations and monitoring data should be periodically compiled and sent to relevant experts for analysis. See EMPr Section 5.6.9.</p> <p>As with any of the other concerns, monitoring and appropriate action is central to the success of the project, for both the project itself, as well as the affected environment and its users.</p>
			<ul style="list-style-type: none"> Another issue is the feeding of fish and non indigenous 	Ecosense	The Salmonid species that are proposed would reduce the risk of genetic and

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
			<p>fish can result in :</p> <ul style="list-style-type: none"> • Changing the water balance with increased new foreign food forms and matter. • Note I believe some of the non indigenous fish are considered more viable 		disease impacts to indigenous fish. The feed regime is scientifically determined and implemented to maximize food conversion ratios and minimize wastage. Water quality issues has been of great concern, but it is the scientific opinion that nutrient loading from Molapong on its own would not add significantly to the nutrient loading in the Bay, although the same cannot be said for DAFF's ADZ, which is several orders of magnitude greater. Even the nutrient loading from the ADZ will be difficult to detect through site based monitoring against the high natural background variability (refer to DAFF scientists responses during the Focus Group meeting – see section 4.1 and Dr Barry Clarke and the SBWQFT).
			Can I please ask these points raised and registered be considered carefully. Should the evaluating authority or board wish to discuss this further I would make myself available at their request.	Ecosense	Your points have been included here for consideration.
			<p>We all want jobs, economic progress etc, however green tourism is the only sustainable material asset this region has, please don't risk so much for such a much smaller consequential potential gain, Yours sincerely John van der Vyver</p>	Ecosense	<p>Noted. The 2015/16 Saldanha Bay IDP includes Aquaculture as a labour growth industry for promotion. The 2011 Saldanha Bay SDF promotes the growth of alternative agro-sector industries, which would include Aquaculture. The precautionary principle supporting NEMA is very strongly emphasized by the DAFF in that the conservative estimate for finfish production carrying capacity is some 24600 t (Table 6 of SRK ADZ final BAR within Section A 1 a) D2) and then it recommends that production is further capped at 15% of the calculated capacity for the bay being approximately 5 150 tpa. Thus with the Molapong application requesting a maximum of 2000 t, which equates to less than 40% of an already very conservative 15% estimated carrying capacity, the Molapong project supports the principle of sustainability.</p>
			<p>Please register me as an I&AP for this project. Here are the our details:</p> <ol style="list-style-type: none"> 1. John van der Vyver, ID 7007125216083, Langebaan property owner 2. Friday Island (PTY) LTD, tourism based accommodation and restaurant business, focussing on kitesurfing, SUP, windsurfing, hobie sailing and water sports, where water sport tourism is Langebaan's biggest summer income stream. 3. Langebaan Kitesurfing Guild, organisation responsible for managing kitesurfing in Langebaan and its facilitation and interaction with other water users and stakeholders. 4. Race Director Langebaan Downwind Dash 	Ecosense	<p>We note that this has previously been submitted for the ADZ application. The entities will be listed for the Molapong project, but in absence of specific contact details cannot be registered. We refer to Regulation 43 (1) of the EIA Regulations which state that: "A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application." If any of them wish to comment, it must be sent in writing and state the issues that may be of significance in consideration of the application, as well as any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.</p>
			In addition to Registration as an I&AP :	Ecosense	We note that this comment refers to the ADZ application.

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
			<p>1. Please provide an overview of the public participation process to date, based on knowledgeable and experienced parties who can comment with respected subject matter knowledge on the wider effect of this proposed project to all Water users, stakeholders, their safety and also the ability of this project to not jeopardise, damage and erode current income, jobs, rights and enjoyment these users have. Note the effect on tourism income could easily erode more than this project seeks to gain for the community.</p>		<p>Please refer to section 1 of this Comments and responses report, which provides a summary of the Molapong public participation process. Note that this is a separate process to the ADZ process, for which the overview was requested.</p>
			<p>2. The proposed venue is a world class venue that hosts many annual sailing regattas for Hobie Cats , dingies and Keel Boats. Many Nationals and world championships have been held here, this project will wipe this entire venue out as a world acclaimed sailing venue of choice. These areas also present great dangers for sail boats at day and night and how they currently navigate the lagoon. These areas also sprawl as they have in Saldanha and many people have been badly hurt sailing into these areas which are badly marked, not accurately on charts or don't provide reasonable course of sail as weather and wind change daily.</p>	Ecosense	<p>We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong. The pilot project of Molapong will be transferred to the new areas being applied for, as described in the alternatives section of the report (refer to Section E of the BAR). The new location would be outside the major recreational user's routes. The areas the cages are in have been indicated on navigational charts for many years (SAN 1011 Date 30/11/1977 and 30/11/1984) as an aquaculture area. Marine notices were also given out. Cages are lit up and have radar reflectors on. Should incidents of this nature occur it should be reported to SAMSA.</p>
			<p>3. The Langebaan Downwind Dash, the longest running windsurfing, kiting and sailing event since 1984, featuring windsurfers, kitesurfers, hobie cats and SUPs racing from Langebaan to Saldanha over 22km crosses this proposed areas several times. This event draws 100s of competitors, is featured in magazines, TV and social media and greatly boosts Langebaan area for tourism. The current facility in Saldanha needs to be managed tighter as any unmarked areas, broken off areas has caused previous physical damage to competitors previously. Increased areas are not an option for a safe race and the consequential liability to the people doing this farming starts to be a serious factor. We also need to ensure that the current facility in Saldanha carries sufficient 3rd party insurance, this if for facility, any unmarked areas and any equipment that breaks free and can be readily identified as sea farming equipment.</p>	Ecosense	<p>We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong. The importance of tourism events such as the Downwind Dash is not denied and as such Molapong has applied for an area that does not fall within this route. As noted above, the equipment that broke free did not belong to Molapong. The structures (6 cages) withstood the 30 year storm of June 2017. The EMPr specifies strict procedures to avoid such incidents with reporting protocols, including branding of equipment to determine who it belongs to. Please refer to EMPr section 5.6.2 for waste management, 5.6.3 for infrastructure and equipment management (including regular maintenance) and 5.6.12 whereby all incidents should be reported. Note that the EMPr also requires the establishment of a liaison forum, which would provide the public with a mechanism to report such incidents</p>
			<p>4. Paddling and SUP, this area is used several times a</p>	Ecosense	<p>We note that this comment refers to the ADZ application. However, we</p>

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
			week for the paddles from Langebaan Yacht Club and the Langebaan SUP forum, have these organisations been polled and considered for input.		provide this response in the context of Molapong. A large number of organisations including the surfing, paddling and sailing community were requested to comment on the Molapong application. Please refer to Section 2 of the Comments and responses report for identified organisations.
			5. Farming in access zones to the mouth is dangerous to all sailing and access routes as in rougher weather conditions many vessels approach from the south inside Jutten island, fouling or being stuck is dangerous.	Ecosense	We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong. The Molapong project will not be located in any of these areas.
			6. In these initiatives equipment often breaks loose in storms, this drifts unmarked in the water, many water users move at high speeds, kiting and windsurfing, hitting this at speed is very dangerous. This aside Langebaan has a very large industry teaching kite surfing, windsurfing and sailing, where learners and inter mediate ability students can get blown down to these areas, panic and incur serious injury or worse. One bad injury or drowning would damage langebaan tourism and these industries hugely.	Ecosense	We note that this comment refers to the ADZ application. However, as noted above, the equipment that broke free did not belong to Molapong. The structures (6 cages) withstood the 30 year storm of June 2017. The EMPr specifies strict procedures to avoid such incidents with reporting protocols, including branding of equipment to determine who it belongs to. Please refer to EMPr section 5.6.2 for waste management, 5.6.3 for infrastructure and equipment management (including regular maintenance) and 5.6.12 whereby all incidents should be reported. Note that the EMPr also requires the establishment of a liaison forum, which would provide the public with a mechanism to report such incidents
			This aside I feel this initiative needs to be viewed and commented by all related and effected parties objectively : <ul style="list-style-type: none"> This is private enterprise in public space, the area needs commercial assistance, jobs and food, it just has to be done in a responsible manner and in areas that don't impact current water users and established routes. 	Ecosense	We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong. The pilot project of Molapong will be transferred to the new areas being applied for, as described in the alternatives section of the report (refer to Section E of the BAR). The new location takes current water users and established routes into account as it would be outside the major recreational user's routes.
			<ul style="list-style-type: none"> The relevant informed and knowledgable parties need to be engaged, Langebaan Yacht Club, Langebaan Kitesurfing Guild, Windsurfing SA, SAKA, Hobie SA and SAS, Langebaan paddling and SUP club, NSRI, Mykonos harbour, Saldanha Bay Yacht Club. 	Ecosense	We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong. A large number of organisations including the surfing, paddling and sailing community were requested to comment on the Molapong application. Please refer to Section 2 of the Comments and responses report for identified organisations. Note also comprehensive comment received ffrom SA Sailing and the attendance by Atlantic Yachting at the focus group meeting of 22 May (see section 4.1 of this Comments and Responses report for proceedings)
			<ul style="list-style-type: none"> Tourism and Municipality current initiatives and future objectives need to be discussed and managed, ie we can't jeopardise the little we have in a hope to get more. 	Ecosense	We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong. The relevant municipal planning frameworks have been considered for the Molapong application and they were also requested to comment. In their comment received

NUMBER	NAME	DATE	COMMENT	RESPONSE BY	RESPONSE
			<ul style="list-style-type: none"> Langebaan Ratepayers where the greater consensus and good of the town can be managed and balanced 	Ecosense	We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong Langebaan is not the only affected area and the Greater Saldanha Bay area was considered.
			<ul style="list-style-type: none"> Sanparks need to be consulted and their input respected. 	Ecosense	We note that this comment refers to the ADZ application. However, we provide this response in the context of Molapong. SANParks provided comment and we have responded. See point 19 under Section 5.2. SanParks also attended the Focusgroup meeting of 22 May. See section 4.1.

5.4 Summary of key issues raised and responses thereto

Note that this summary should be read with the detailed comments received and responses given to each comment in section 5.1-5.3 above.

Name & Organisation	Comment period	Issue summary	General response to issue
ADZ			
T Gawulekaya N Duarte SDM	1	Total impact of aquaculture is concerning	<p>It is noted that there is a general objection raised against the authorization of the ADZ. Although it is not the Molapong project's obligation to answer the concerns raised in terms of the ADZ, it is acknowledged that the proposed project could contribute to the cumulative impact associated with the ADZ.</p> <p>The precautionary principle is very strongly emphasised in that the conservative estimate for finfish production carrying capacity calculated for the bay is some 24 600 t (Table 6 of SRK ADZ final BAR within Section A 1 a) D2) and then recommends that production is conservatively capped at an initial 15% of the capacity being approximately 5 150 t pa. Thus with this application requesting a maximum 2000 t it equates to less than 10% of the calculated carrying capacity for the Bay.</p> <p>In that there is relatively low technical / empirical data on cage culture of salmonids in the South African coastal waters and in the Western Cape in particular, this application has certainly encouraged the need to apply the precautionary principal as envisaged in section 24 of the Constitution and Section 2(4)(a)(vii) NEMA, which requires a risk-averse and cautious approach. It can be contended that this application for approximate 8% of the total calculated carrying capacity, phased over a five year period to enable empirical data to be gathered to support any decisions forward, conforms to such</p>
Michael Robinson / Beth le Suer SAS WC	2	SAS notes to be a stakeholder in the ADZ process due to its interest in all forms of sailing and works with authorities for most beneficial use of water bodies suited for recreational use	
Michelle Pretorius DAFF	2	ADZ species doesn't include Brown trout	
DEA ICM	3	Future development proposals or amendments to current proposals must be submitted to DEA: Coastal Conservation Strategies	
Marne van der Westhuizen SANParks - Cape Region	2	<p>Pollution from service vessels</p> <p>Circulation in the Bay</p> <p>Distance and impacts of various methods of farming on all islands - require buffer zones</p> <p>Concerned about increasing number of aquaculture projects</p> <p>Not in favour of Jutten Island,</p> <p>Must align with ADZ</p>	
Marne van der Westhuizen SANParks - Cape Region	2	Concern about poor Water Quality as a result of water and land based facilities that could affect the Lagoon MPA	
Needham family	1	Concern about not being registered as they asked to be registered in the previous process (ADZ)	
Jennifer Kamerman SLL	3	<p>Outright objection against ADZ</p> <p>Questioning support for food security if wild stocks will be used for feed</p> <p>Refers to scale of ADZ and that the site specific risks within the lagoon and bay system are not</p>	

Name & Organisation	Comment period	Issue summary	General response to issue
		addressed	<p>approach. The current data sets in the experimental phase for 50 t show low measurable variants The EMPr mitigation measures incorporating the International MOM monitoring techniques and this applicant's intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment. Furthermore, it has been agreed that Molapong become an official member of the SBWQFT – see email correspondence in section 4.2b.</p> <p>The pilot project of Molapong will be transferred to the new areas being applied for, as described in the alternatives section of the report (refer to Section E of the BAR). The new location takes current water users and established recreational routes into account as it would be outside the major recreational user's routes.</p>
Christo van Wyk SBWQFT	3	Same fears as for ADZ	
Andre Pretorius PAAS	3	Molapong application cannot be handled separately from ADZ	
John van der Vyver	3	6 categories of both objection and non viability jeopardizing existing water tourism revenues, existing long standing rights in these water and water safety.	
FEED			
T Gawulekaya N Duarte SDM	1	Feed composition	<p>The feed that is currently used on the experimental farm in Saldanha has a 15% inclusion rate of fishmeal from a sustainable source. South African fishmeal is of too low standard to be used as fish feed, most of our fish meal is exported to the East for poultry feed. No local fish species is therefore used for feed.</p> <p>It is envisaged to trial out a new diet by the same producer which is 100 % free of marine proteins. Fish meal inclusion from a sustainable source is however only one of the fish feed ingredients that are audited in the ASC certification audit scheme. All ingredients included in the diet, including Soy and Palm oil need to be from certified sustainable sources. Please refer to the ASC standards and audit questions that have been included as part of the Environmental Management Programme for implementation by the project. The EMPr specifies feed management in Section 5.6.11.</p> <p>The aim of finfish farming is to grow fish with the least amount of feed. Wastage of feed is therefore avoided as far as possible through careful calculation of the daily required feed amount, observation of the feed activity by the person feeding the fish as well as divers.</p>
N Duarte SDM	2	Source of fishmeal component of feed	
Keith Harrison WCBC	3	The feed is based upon small pelagic fish species on which seabird species depend	
Jennifer Kamerman SLL	3	Composition of feed as well as fish in fish out ratio Questioning support for food security if wild stocks will be used for feed	
MONITORING			
Asanda Njombeni DAFF Sustainable Aquaculture Management	1	Acknowledgement of extensive engagement with DAFF on monitoring for the project. Copper monitoring was excluded in the first draft BAR, monitoring to be updated to commercial scale for the project.	<p>An industry wide liaison and monitoring committee has been recommended, which DAFF has indicated is going to be implemented. There is also commitment from DAFF to ensure authority oversight and accountability in relation to ensuring monitoring and implementation of both permit conditions and approved specifications.</p> <p>Molapong is proposing to increase its production in a staggered way</p>
N Duarte SDM	2	Referred the applicant to the SBWQFT, which is a monitoring body in the Bay.	
Jennifer Kamerman SLL	3	Concerned that there is a lack of norms and standards for aquaculture in SA and that guidelines are not enforceable	

Name & Organisation	Comment period	Issue summary	General response to issue
Moses DEA ICM	3	Requires frequent water sampling and analysis through an accredited analysis centre. Not adequate information in the BAR re site specific monitoring systems that meet or exceed international best practice standards.	but monitored all the time. If the monitoring shows that there is an increase in the environmental impact the farm will have to change its operational procedures in order to bring the impact within the legal DAFF requirements. Monitoring is specified in the aquaculture permit conditions, which are annually reviewed and issued (see Appendix E to the BAR). Saldanha bay water quality has been monitored by different parties over the past years. Dr Barry Clarke who is involved in the State of the Bay reports was consulted in addition to DAFF scientists. He indicated that nutrient loading from Molapong on its own would not add significantly to the nutrient loading in the Bay. Even the nutrient loading from the ADZ will be difficult to detect through site based monitoring against the high natural background variability (high variability on a weekly basis linked with upwelling events). He would expect to see overall average nutrient levels in the Bay rise relative to historic levels though (see email correspondence in section 4.2).
Christina Hagen BLSA	3	An impact report on existing farms in the Bay would be useful	
Michelle Pretorius DAFF	2	EMPr – compliance with ADZ generic EMPr	
DEA ICM	3	EMPr – dispersion model must inform mitigation measures in EMPr	
DEA ICM	3	mapping of benthic environment should be done. Organic matter in the benthic environment would result in dissolved oxygen levels, monitoring needed to detect sediment build-up	
Christo van Wyk SBWQFT	3	The SBWQFT, based on scientific monitoring results, is of the opinion that finfish farming can and will have a negative effect on the Langebaan Lagoon.	
PROCESS			
T Gawulekaya N Duarte SDM	1	Conflict between the BAR and RoD from DAFF	There is no conflict. Assuming that it is the Mariculture right RoD being referred to, it should be noted that the right will be amended as required, once the EA has been received
S Abrahams DEA&DP DM	1	Listed activities to be verified Revisions to project descriptions to be in line with listed activities Note inclusion of NEMBA permits and biodiversity risk assessment for AIS Ensure application is complete Include site development plans	The required sections have been updated with the relevant information,
Adri La Meyer-DEA&DP	2	The Directorate Development Facilitation requested information, but acknowledged that they need not be involved if DEA&DP is the Competent Authority	Organs of state contacts have been updated.
Keagan-leigh Adriaanse DEA&DP	2	Indicated that they she would comment, but none received from her directly.	Organs of state contacts have also been updated, which includes Ms Dreyer, additional liaison was also undertaken directly.
Lesia la Grange SAHRA	2	Requested clarity on ADZ vs Molapong, requested documents to be uploaded to SAHRIS	Uploaded necessary documents
Kishan Sankar DAFF	2	Responded to DEA&DP re listed activities that are not applicable	No response required
Andrea Bernatzeder – Phakisa DAFF		Responded to DEA&DP re requirement for biodiversity risk assessment (not required, since species are not on AIS list)	
Jennifer Kamerman SLL	3	Decision cannot be taken with current limits in knowledge	The issues have been addressed to our best ability after consultation with various experts. It is our contention that the information contained in the report is sufficient to allow authorities to take a decision.
Andre Pretorius PAAS	3	The expansion of Molapong project is unlawful as it is an attempt the separate the project from	The EAP has screened this contention as best we can and states

Name & Organisation	Comment period	Issue summary	General response to issue
		the ADZ, which is a breach of Regulations.	without prejudice that no substantiated indications for this being unlawful were apparent. The Malopong application is a legally entitled standalone application and must be processed as such.
PUBLIC PARTICIPATION			
S Abrahams DEA&DP DM	1	Proof of public participation must be included in the BAR	Proof is included as part of this comments and responses report.
Mr Georg Agotnes SCSF	1	Request for registration as IAP	Registered as specifically requested, register of interested and affected parties include in section 2.2 of this Comments and Responses report.
Inge Frost	3	Request for link to BAR	
D.A. Whitelaw CBC	3	Request for registration as IAP	
Christo van Wyk SBWQFT	3	Request for registration as IAP	
Bev le Suer SAS WC	3	Request for confirmation of registration as IAP	
Deirdré Pretorius West Coast Business Chamber	3	Request for registration as IAP	
Michael Clemitson Ag Technical Services Limited	3	Request for registration as IAP	
Marina Black	3	Request for registration as IAP and request for explanation of BAR	
Liezel Delport Boschendal	3	Request for registration of two parties as objectors	
Inge Frost SLL	3	Request for registration of SLL as IAP	
Christina Hagen BLSA	3	Request for Registration	
Guy Musson Saldanha Bay Oysters	2	Request for Registration	
John van der Vyver	3	Request for Registration	
Jennifer Kamerman SLL	3	The requirements for public participation as in NEMA EIA Regs were not fulfilled Approach could not provide access to information and consultation with all potential IAPs - those not living permanently in Langebaan were excluded Not sufficient notice in Langebaan Reasonable alternative methods for disadvantaged IAPs (referring to those not living permanently in Langebaan) are questioned Timeframe unreasonable due to overlap with ADZ comment period Choice of Weslander - language not representative Illiteracy not considered No advert in national newspaper Poor response by individual IAPs Due to shortened timeframes of the regulations, Ecosense should have facilitated broader	

Name & Organisation	Comment period	Issue summary	General response to issue
		public participation	but in terms of the legal obligations and guidelines we submit that these have been met and surpassed both in spirit and fact.
Jennifer Kamerman	3	All current members of the SLL are registered IAPs as they have given proxy	Without contact details and comment in writing, stating the issues that may be of significance in consideration of the application, as well as any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application, individuals cannot be registered. Regulation 43 (1) of the EIA Regulations state that: "A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application." Thus the SLL has been registered as interested and affected party.
John van der Vyver	3	Registration of 3 other entities as interested and affected parties	
Andre Pretorius PAAS	3	The pilot project did not go through public participation or environmental authorisation process	There was no legal requirement for the pilot project to apply for environmental authorisation, as the production output of less than 50t does not require such.
SITE LAYOUT / LOCALITY / PROXIMITIES			
S Abrahams DEA&DP DM	1	Requested site layout for the cage assembly area	Only one of the proposed areas for Molapong is immediately next to a marine protected area - the Jutten Island MPA. According to the latest ADZ layout (June 2017), which this report has taken into consideration, the Molapong sites fall within the ADZ. The Island is one of the identified Important Bird Areas. In a meeting with Bird Life SA, it was agreed that adherence to high international standards (ASC) would put the necessary measures in place to ensure that impacts on birds, should they occur, would be recorded and acted upon.
John Selby	2	Requested information on onshore processing facility	
Marina Black	3	The TNPA lease areas and aquaculture right presents conflicting information (inner bay)	
Doretha Kotze WCDM	3	Alternative 3 falls outside proposed ADZ	
WCDM Doretha Kotze	3	no objection to Jutten site	
Marne van der Westhuizen SANParks - Cape Region	2	Proximity to Jutten MPA is concerning as Jutten and Malgas host important bird colonies	
Christina Hagen BLSA	3	Due to important breeding areas on the islands, a larger buffer zone is recommended. Not in favour of aquaculture adjacent to MPAs.	
DEA ICM	3	Impacts on MPA - EMP must consider MPA objectives	
Andre Pretorius PAAS	3	Project is next to SAS Saldana Conservation Area and Saldanha Crayfish Protected Area	
Mr Georg Agotnes SCSF	2	Transnet indicated that no additional leases would be granted near SCSF site by Jutten	The decision lies with Transnet to allocate seaspace.
Mr Georg Agotnes SCSF	2	Minimum distances were indicated in the Norwegian standards, Canadian study and local Specialist opinion (10km)	The indicated distances is not practically possible as the size of the Bay is less than that.

Name & Organisation	Comment period	Issue summary	General response to issue
John van der Vyver	3	Broken infrastructure and collisions with water users	<p>The equipment that broke free in recent storms did not belong to Molapong. The structures (6 cages) withstood the 30 year storm of June 2017.</p> <p>The EMPr specifies strict procedures to avoid such incidents, including branding of equipment to determine who it belongs to, infrastructure and equipment management (including regular maintenance) and reporting of all incidents. The EMPr also requires the establishment of a liaison forum, which would provide the public with a mechanism to report such incidents.</p> <p>The areas the cages are in have been indicated on navigational charts for many years (SAN 1011 Date 30/11/1977 and 30/11/1984) as an aquaculture area. Marine notices were also given out. Cages are lit up at night and have radar reflectors on. Should incidents of this nature occur it should be reported to SAMSA.</p>
WASTE MANAGEMENT			
T Gawulekaya N Duarte SDM	1	Waste management - no packaging materials to be dumped at sea	This has been included in the relevant sections of the EMPr for implementation.
DEA ICM	3	Mortalities should be disposed of at licensed landfill Entanglements must be attended to through frequent monitoring	
HERITAGE / ARCHAEOLOGY			
N Duarte SDM	2	To notify municipality of any archaeological finds	These aspects have been included as procedures in the EMPr.
Lesia le Grange SAHRA	3	heritage conditions re mooring, geophysical surveys, recording of wrecks, permits for wrecks, all documents on SAHRIS	
SOCIO-ECONOMIC			
Michael Robinson / Beth le Suer SAS WC	2	Economic benefit of sailing	<p>These benefits are acknowledged. The appreciation of the Langebaan Lagoon's sports and tourist value is borne out in that the applied for areas do not include any of the Lagoon sites and the current experimental site is to be moved further into the harbour and away from approach areas. There will therefore be no aquaculture development in the lagoon, although it would be visible from an elevated height against the backdrop of an industrialised harbor. If the mitigation measures as stated in the BAR are implemented, residents and visitors to the area may consider the project to be congruent with the marine environment and perceived use of Saldanha Bay as a marine development zone (also considering the existing aquaculture operations within the Bay).</p>
Michael Robinson / Beth le Suer SAS WC	2	employment creation by sailing	
Michael Robinson / Beth le Suer SAS WC	2	established sailing activities	
Michael Robinson / Beth le Suer SAS WC	2	income generated by sailing	
Doretha Kotze WCDM	3	Expansion of aquaculture activities may have impact on tourism	
Marne van der Westhuizen SANParks - Cape Region	2	Tourism potential to be investigated	
Marne van der	2	User conflict to be taken into account - users of the bay, island users	

Name & Organisation	Comment period	Issue summary	General response to issue
Westhuizen SANParks - Cape Region			
Jennifer Kamerman SLL	3	Provides info on services and tourism, which outperforms the manufacturing sector. Lack of specific socio-economic impact assessment for Langebaan BAR doesn't have statistics on current aquaculture enterprise Revenue from project not indicated (ADZ) Key attractions and economic growth in Langebaan threatened.	
John van der Vyver	3	Influence of shark attacks on tourism	The Molapong cages are visited daily and no predator interaction, other than one seal trying to grab a dead fish on the bottom of a cage has been observed. Any mortalities are however removed daily. The EMPr provides for monitoring of such interactions through keeping a log of all cetaceans, seabirds and predators recorded in the vicinity of fish farms, including behavioural observations. Marine animal observations and monitoring data should be periodically compiled and sent to relevant experts for analysis. As with any of the other concerns, monitoring and appropriate action is central to the success of the project, for both the project itself, as well as the affected environment and its users.
PLANNING INSTRUMENTS AND INTERNATIONAL STANDARDS			
Marne van der Westhuizen SANParks - Cape Region	2	EMF to be taken into account - sensitivities	The EMF holds draft status at the time of drafting and has not been formally adopted from the final draft of Feb 2015. The zoning of the areas is acknowledged and the Zone 2 indicated Aquaculture consideration - development with care. The South African Cabinet commissioned an economic potential study for the ocean areas off South Africa in 2013 and this indicated that this Ocean sector could significantly increase its GDP contribution to the economy and to job creation. The Aquaculture industry sector was identified as one of the sectors' high potential growth vectors and is included under the National Operation Phakisa development to support the National Development Plan, 2030. The intention to meet ASC Standards (being the highest international industry standard) supports the integrity and intent to responsibly develop the industry without significantly impacting the environment
Jennifer Kamerman SLL	3	EMF states that aquaculture could be considered for public interest but is likely to have significant effects at scale	
Christo van Wyk SBWQFT	3	Bigbay and the lagoon is sensitive and EMF advocates limited or no development. Uncertain about status of EMF	
Michael Robinson / Beth le Suer SAS WC	2	Langebaan municipal strategic plan will not be implemented if waters are not shared/managed effectively. Investment in this plan is based on growing water sport activities	
Andrea Bernatzeder – Phakisa DAFF	2	The project is formally acknowledged as part of Phakisa work stream	
Mr Georg Agotnes SCSF	2	International standards for location, operation, infrastructure design and management of water quality and pollution is important in absence of local regulatory regime	
WATER QUALITY / POLLUTION			
Michael Robinson / Beth le Suer SAS WC	2	pollution free water for aquaculture as well as recreational users	The mitigation measures in the BAR have been proposed through careful consideration of available specialist input, consultation with authorities and stakeholders directly involved in the specific concerns raised (such as water quality and birds). Ongoing engagement with these roleplayers have provided opportunity for further consideration of the proposed project with productive input received. Further engagement with scientists have also resulted in a clearer picture of
PAAS Andre Pretorius	3	pollution	
John Selby	2	Concerned about discharge of sewage and pollution from Elandsfontein phosphate project Water quality	
Marne van der Westhuizen SANParks	2	Water quality of lagoon and areas adjacent to island hosting endangered sea birds and lagoon with endemic line fish that are vulnerable to disease	

Name & Organisation	Comment period	Issue summary	General response to issue
- Cape Region	2	Influence of high metal loads on farmed fish	<p>how mitigation can be implemented successfully, added to it a precautionary approach, which is one of the main principles of NEMA. It is widely published and acknowledged that the Saldanha Bay system, of which the Langebaan Lagoon forms only a part is under environmental stress, hence the precautionary approach and consideration of cumulative effects. As stated in the State of the Bay report (2016), the development of the Saldanha Bay port has significantly altered the physical structure and hydrodynamics of the Bay, whilst all developments within the area (industrial, residential, tourism etc.) have the potential to negatively impact on ecosystem health.,</p> <p>Molapong is proposing to increase its production in a staggered way but monitored all the time. If the monitoring shows that there is an increase in the environmental impact the farm will have to change its operational procedures in order to bring the impact within the legal DAFF requirements. Monitoring is specified in the aquaculture permit conditions, which are annually reviewed and issued (see Appendix E to the BAR).</p> <p>Saldanha bay water quality has been monitored by different parties over the past years. Dr Barry Clarke who is involved in the State of the Bay reports was consulted in addition to DAFF scientists. He indicated that nutrient loading from Molapong on its own would not add significantly to the nutrient loading in the Bay.</p> <p>There is always the potential of environmental pollution when it comes to aquaculture but one must monitor and make decisions according to the real data. Sites can be followed and rehabilitated. If it becomes evident that a project is not sustainable in Saldanha Bay then it will be removed. DAFF issues a marine right and permits, farms are monitored and environmental control officers that report on the projects.</p> <p>The risk has been shown to be manageable with mitigation and as determined by best current information at the time of assessment. That there can be improvement to underlying data and information source is not disputed. The precautionary principle supporting NEMA is very strongly emphasised in that the conservative estimate for finfish production carrying capacity is some 24600 t (Table 6 of SRK ADZ final BAR within Section A 1 a) D2) and then it further recommends that production is further capped at 15% of the calculated capacity for the bay being approximately 5 150 tpa. Thus with the Molapong application requesting a maximum 2000 t, which equates to less than 40% of an already very conservative 15% estimated carrying capacity. The significant reduction in initial allocations of production clearly shows responsible and precautionary</p>
Marne van der Westhuizen SANParks - Cape Region	2	The Langebaan lagoon / Saldanha Bay ecosystem is linked, 12 % of volume of system is exchanged during spring tide and changes in water quality will impact lagoon	
WCDM Doretha Kotze	3	Expansion of aquaculture may have negative impact on water quality in the Bay and lagoon (ADZ?)	
Keith Harrison WCBC	3	Increase of organic load in the lagoon	
Christina Hagen BLSA	3	Concern about chemicals, heavy metals, fish feed, medication and excreta around sites near the lagoon (ADZ?)	
Christina Hagen BLSA	3	No indication of how potential pollutants may be dispersed and Langebaan lagoon impacted by changes in nutrients and water chemistry	
Christo van Wyk SBWQFT	3	Confirmation of current movement required. Lower nutrients and higher temperatures in upper lagoon can lead to eutrophication	
Andre Pretorius PAAS	3	Positioning of projects lies directly in inflow current (ADZ?)	
DEA ICM	3	dispersion (rate of dispersion of organic matter) model to be included in EMP	
T Gawulekaya N Duarte SDM	1	de-nitrification mitigation for wasted food and faecal material if found to have negative impact on state of the Bay	
Marne van der Westhuizen Manager SANParks - Cape Region	2	Nitrification - concern from feeding and excrement	
Christo van Wyk SBWQFT	3	cumulative impacts - must be assessed with other projects	

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			<p>principles being applied to support early detection and if required either modifications to operational management, reduction in biomass, increased fallow requirements, or even curtailment of operations.</p> <p>There is ongoing liaison which included a focus group meeting the minutes of which are included in the submissions. There is further a recommendation that there is an information sharing / monitoring forum established that will continue to add value and distribute information on activities if this application and or the ADZ application process is acceptable. The principle of this forum is included in our submission and the detail of what structure and process this forum will take is left to the parties participating to decide i.e. direct input into and participation by identified groups / I&AP's.</p> <p>The DAFF have committed to sit on this forum if/when implemented.</p>
DISEASE			
Keith Harrison WCBC	3	Alien disease can be brought in with ova	<p>Ova are required to have permits declaring them disease free by a state veterinarian, examples of which have been included in the BAR. In general, cage culture is considered an open culture system, so there is some exchange naturally between the fish stocked inside the cages and fish outside of the cages. This exchange is exacerbated if the farmed species also naturally occurs in the wild. In this case, the project farms salmonids and there are no naturally occurring salmonids in the bay.</p>
Christina Hagen BLSA	3	Risk of disease or parasite transfer for indigenous fish	
DEA ICM	3	Requires disease management and application of medicines from qualified vet	
Christo van Wyk SBWQFT	3	Risk to stumpnose	
ESCAPEES			
Jennifer Kamerman SLL	3	No guarantees that fish will not escape and therefore mitigation cannot guarantee no impact on wild population, genetic influence	<p>There is no guarantee in preventing escapees although it is mitigated and minimised through net materials, inspection protocols and management. It is unlikely that escapees will assimilate to the external environment in terms of habitat and food competition. Salmonids do not occur in these waters. There is a reasonable abundance of predatory fish which would predate on escapees.</p>
DEA ICM	3	Risk to abundance and distribution of local species: competition for food and territory	
LANGEBAAAN LAGOON			
Jennifer Kamerman SLL	3	Project sites mentioned and the lack of site specific feasibility (ADZ?) Impact on lagoon with minimal rehabilitation potential	<p>The importance of the lagoon is not denied. The Molapong sites would be located over 2,5km from the mouth of the lagoon and water quality impacts on the lagoon specifically has been discussed with scientists and key stakeholders to put satisfactory monitoring protocols in place, allow for sharing of information and thus ensure early detection of impacts to decide on appropriate action to be taken.</p>
Christina Hagen BLSA	3	Importance of lagoon and wetland	
Christina Hagen BLSA	3	Lagoon is not mentioned as important	
MARINE AND BIODIVERSITY IMPACTS			
Andrea Bernatzeder – Phakisa DAFF	2	Biodiversity risk assessment - response to DEADP comment: not required	No response required

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T Gawulekaya N Duarte SDM	1	Design and layout of cages should not impact negatively on marine life	Design and layout mitigation is contained in the EMPr.
S Abrahams DEA&DP DM	1	Requires Assessment of marine impacts	Marine ecology assessment undertaken for the ADZ was considered and referenced. The precautionary approach of the project would serve to identify and act upon any site specific impacts that may occur.
Christo van Wyk SBWQFT	3	<p>Fin fish will have a negative impact on marine habitat and resident species like the White Stumpnose and could pose a threat to endangered resident Waders and other species, should eutrophication occur and these species' food security be compromised.</p> <p>Impacts to resident fish species like the White Stumpnose, benthic environment, which is food source for endangered bird species, water pollution that could well due to nutrient enrichment cause eutrophication rating should be high to very high, it could be detrimental to the upper lagoon area of Geelbek.</p> <p>Endangered bird species are dependent on the specific benthic community that currently exist for their food source.</p> <p>It is anticipated that nutrients from the proposed farms will be also be "moved" to the upper lagoon due to current movement. (Huge risk)</p>	In that there is relatively low technical / empirical data on cage culture of salmonids in the South African coastal waters and in the Western Cape in particular, the Molapong application has certainly recognised the need to apply the precautionary principal as envisaged in section 24 of the Constitution and Section 2(4)(a)(vii) of NEMA, which requires a risk-averse and cautious approach. This application is for 2000 t, which is less than 10% of the conservatively estimated 24 600t carrying capacity for the Bay and would be implemented in stages to allow for early detection of impacts. Dr Barry Clarke who is involved in the State of the Bay reports was consulted in addition to DAFF scientists. He indicated that nutrient loading from Molapong on its own would not add significantly to the nutrient loading in the Bay.
Dean Impson Cape Nature	2	Local species that could be impacted should be identified	Molapong is proposing to increase its production in a staggered way but monitored all the time. If the monitoring shows that there is an increase in the environmental impact the farm will have to change its operational procedures in order to bring the impact within the legal DAFF requirements. Monitoring would include watchin behavioural changes of marine animals and birds as per EMPr.
Christina Hagen BLSA	3	Subsidization of seabird predators. What happens after cetaceans, birds and predators have been recorded?	
Keith Harrison WCBC	3	Drawing predators to cages will increase pressure on birds	
DEA ICM	3	Farmed species must be sterilised to eliminate risk of breeding with local species	
Christina Hagen BLSA	3	anti-fouling agents have impact, on other hand mechanical cleaning expensive and less regular which may lead to net failure	The net is treated with an antifouling paint, this is done at a net making company in St Helena bay on shore. The net cleaning also takes place there on land. Nets are inspected regularly as part of the EMPr requirements to avoid net failure.
Christo van Wyk SBWQFT	3	The total production unit should consider assimilative ecological carrying capacity and food production	The Molapong application is for 2000 t, which is less than 10% of the conservatively estimated 24 600t carrying capacity for the Bay and would be implemented in stages to allow for early detection of impacts
Christina Hagen BLSA	3	CBA - the sites fall within Vulnerable and Endangered ecosystems and are therefore sensitive	Noted and corrected in report
VISUAL			
Marina Black	3	There are a few experimental cages falling outside inner bay, which don't have navigational lights and are visible from shore	The cages do have navigational lights and are visible from elevated heights.
Jennifer Kamerman SLL	3	Lack of visual impact assessment in the BAR. High visibility to many residents and visitors on land as well as those who use the lagoon and bays for recreation. Currently there are few and immaterial visual disturbances experienced by Langebaan residents from the existing	It is not denied that the project would have visual impact. The scale of visual impact of the Molapong project vs the ADZ in full operation must, however, not be confused. The Molapong project would only

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		<p>aquaculture operations. The undisturbed natural integrity of Langebaan lagoon is a major contributor to sense of place and visual quality vs the town of Saldanha Bay with industrialised landscape. Whilst the proposed development in Big Bay will be less visible to residents and holidaymakers in the Langebaan town itself, the uninterrupted long-range views that many such residents currently enjoy (e.g. Myburg Park), and the very same lagoon and bay view aesthetics that have attracted them to invest and settle in the area, will be irrevocably impaired by the industrialisation of their outlook. Refers to Minister of Environmental Affairs Algoa Bay decision on appeal which notes that fish farms idea location is a long distance from tourist facilities and outside public scrutiny.</p>	<p>be a small component of the ADZ area, which has already considered the cumulative visual impact for the ADZ and further increased the distance from shore. A more detailed visual assessment is not considered a further requirement for the Molapong project, which, if the mitigation measures are implemented, residents and visitors to the area may consider the project to be congruent with the marine environment and perceived use of Saldanha Bay as a marine development zone (also considering the existing aquaculture operations within the Bay, and the backdrop of a highly industrialised harbor, iron ore jetty, container ships etc). Mitigation includes spreading mooring grids over two sites as far as possible to avoid larger concentrations of cages, of which the bulk would be more visible. Reducing height of bird net supports and the use of only one low visibility colour on netting (e.g. grey based hues), downward pointing shaded lights and marking of equipment for retrieval purposes, as per EMPr requirements</p>
OTHER / GENERAL			
Jennifer Kamerman SLL	3	Relevant spatial plans must be considered. Not clear that Molapong project harmonises with SDP, especially for Langebaan.	The 2015/16 Saldanha Bay IDP includes Aquaculture as a labour growth industry for promotion. The 2011 Saldanha Bay SDF promotes the growth of alternative agro-sector industries, which would include Aquaculture.
Michelle Pretorius DAFF	3	no comment	No response required
Marina Black	3	correction	Corrected
Keith Harrison WCBC	3	Objection to sea-based aquaculture projects	Noted
Christo van Wyk SBWQFT	3	objection against finfish	
Andre Pretorius PAAS	3	objection against finfish	
Marina Black	3	Availability of applicable Permits	Included in Appendix E of the report
Christina Hagen BLSA	3	recirc alternative - references or data should be provided why this is more costly and has higher carbon footprint	<p>The energy inputs and use of resources to build and maintain such a recirculation facility is by its design and nature environmentally less acceptable. Pumps, water use and waste treatment as well as temperature and lighting controls are obvious issues and costs. Although feed conversion in closed systems can be better the energy consumption (and associated carbon footprint) in conversion and lifecycle can be higher. A study by Aubin et al was used as reference (full reference in BAR), which compared freshwater raceways, sea cages and inland recirculation systems. The re-circulation system was a high energy-consumer compared to the raceway system (four times higher) and the sea cage system (five times higher).</p>

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DEA ICM	3	No objection to proposed project	Noted
Michael Robinson / Beth le Suer SAS WC	2	support for aquaculture despite concerns	
Mr Georg Agotnes SCSF	2	support for aquaculture despite concerns	

6. Copies of comments received

Comments were received from the following who have accordingly been registered as stakeholders (attached hereafter):

NAME	ORGANISATION	DATE RECEIVED
On draft BAR distributed to authorities only (September 2016)		
Asanda Njombeni	Director: DAFF Sustainable Aquaculture Management	26/09/2016
T Gawulekaya & N Duarte	Saldanha Bay Municipality	10/10/2016
S Abrahams	DEADP Development Management	08/12/2016
On pre-application BAR distributed to authorities and identified stakeholders (December 2016)		
Adri La Meyer- DEADP	DEADP Development Facilitation	19/12/2016
Adri La Meyer- DEADP	DEADP Development Facilitation	09/01/2017
Keagan-leigh Adriaanse	DEADP	19/12/2016
John Selby		16/12/2016
Needham family		17/12/2016
Lesla la Grange	SAHRA	19/12/2016
Guy Musson	Saldanha Bay Oysters	20/12/2016
Dean Impson	Cape Nature	21/12/2016
Kishan Sankar	DAFF Operation Phakisa Delivery Unit	22/12/2016
Kishan Sankar	DAFF Operation Phakisa Delivery Unit	03/01/2017
Andrea Bernatzeder	DAFF Operation Phakisa Delivery Unit	03/01/2017
Taryn Dreyer	DEADP Development Management (Region 1)	09/01/2017
Michael Robinson	South African Sailing	16/01/2017
Mr Georg Agotnes	Southern Cross Salmon Farming (Pty) Ltd	11/01/2017
Michelle Pretorius	DAFF	06/02/2017
Marne van der Westhuizen	Planning and Implementation SANParks - Cape Region	06/02/2017
N Duarte	Saldanha Bay Municipality	31/01/2017
On application BAR distributed to authorities and identified stakeholders (March 2016)		
Inge Frost	Save the Langebaan Lagoon Action Group	20/03/2017
Keith Harrison	West Coast Bird Club – Conservation	25/03/2017
D.A. Whitelaw	Cape Bird Club Conservation Committee	20/04/2017
Christo van Wyk	Saldanha Bay Water Quality Forum Trust	16/03/2017
Bev le Sueur	South African Sailing	30/03/2017
Deirdré Pretorius	West Coast Business Chamber	22/03/2017
Michael Clemitson	Ag Technical Services Limited	28/03/2017
Marina Black	None indicated	24/03/2017
Liesel Delpont	Boschendal	20/03/2017
Inge Frost	Save Langebaan Lagoon Action Group	20/04/2017
Jennifer Kameron	Save Langebaan Lagoon Action Group	21/04/2017
Christina Hagen	Bird Life South Africa	21/04/2017
Michelle Pretorius	DAFF	10/04/2017
Moses Ramakulukusha	DEA: Integrated Coastal Management	04/04/2017
Lesla le Grange	SAHRA	21/04/2017
Christo van Wyk	Saldanha Bay Water Quality Forum Trust	19/04/2017
Doretha Kotze	WCDM	20/04/2017
Andre Pretorius	People against Aquaculture in Saldanha (PAAS)	26/04/2017
Christo van Wyk	Saldanha Bay Water Quality Forum Trust	06/06/2017
John Van der Vyfer		19/06/2017