

The Independent Environmental Advisor

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13 October 2022

NOTIFICATION & INVITATION TO COMMENT: BACKGROUND INFORMATION DOCUMENT

S24G application for the expansion of the Triple A Beef feedlot and abattoir, Albert Falls, Umshwathi Local Municipality, Umgungundlovu District Municipality: DC22/s24G/0006/2022

Purpose:

Triple A Beef (TAB) on behalf of Caine Farming (Pty) Ltd has made application for environmental authorisation under reference DC22/s24G/0006/2022 for the expansion of the Triple A Beef feedlot and abattoir with associated infrastructure over various contiguous properties in the Albert Falls area, Umshwathi Local Municipality. This application is to regularise the current activities of TAB and does not consider any future expansion or change to activities.

The purpose of this Background Information Document is to provide Interested and Affected Parties (I&APs) with information about the application made under s24G of the National Environmental Management Act and the activities covered by the application. I&APs have the opportunity to register as stakeholders in the public participation process and make initial comments and contributions to the assessment.

Background:

Caine Farming Pty Ltd, trading as Triple A Beef (TAB), operates a feedlot and abattoir in the Albert Falls Dam area over 13 adjacent properties.

TAB is located in a predominantly agricultural rural area to the south east of the village of Albert Falls and south of the Mpolweni settlement area. Mpolweni has few basic services and few economic opportunities other than sugar cane and beef farming opportunities.

The first property (Ptn 8 Shallow Drift) was bought in 1980 to establish a feedlot. As time passed, additional adjacent properties were purchased to enable the expansion of the feedlot and associated infrastructure such as cattle handling facilities (including loading and offloading facilities), transition paddocks, hospital facilities for sick animals, feed preparation, workshops and offices, abattoir, fodder production, and common services for the feedlot and abattoir.

The impetus for each acquisition came from events such as an outbreak of foot and mouth disease and the closure of the nearby CRAFCOR feedlot and ABACOR abattoir at Cato Ridge, as well as the need to treat and dispose of waste water from the abattoir, and then the need to grow as much of the feedlot ration on site as possible thereby reducing reliance on external farming operations.

The closure of the ABACOR abattoir at Cato Ridge necessitated the establishment of the TAB abattoir on site. It provided the benefit that cattle diseases could be better managed and controlled with appropriate quarantine protocols to ensure animal health and meat safety. Moreover, onsite facilities

provided the opportunity for vertical integration and to dispose of wastewater beneficially by irrigating fodder to produce animal feed onsite.

As each property was acquired, worker accommodation was consolidated and amenities provided in consultation with the workers. All amenities and infrastructure required by Triple A Beef are in place, including:

- Administration
- Feed production sheds
- Abattoir and associated cold and freezer rooms, processing carcasses to primal cuts with deboning facilities, hide preparation, offices, waste water treatment ponds
- Feedlot pens with feed and water troughs
- Raw water abstraction points (x4) from the Umngeni River with pipe lines to raw water storage dams (off channel) and reticulation to feedlot pens and other infrastructure
- Waste water dams runoff from the feedlot pens and wash water from within the cattle drinking facilities (off channel).
- Housing for workers (separate for feedlot and farm staff, and for abattoir workers)
- Internal roads and farm tracks
- Manure storage area
- There is a rendering plant that was constructed in 2005 to treat bloods, tissue and paunches from the abattoir to tallow and other secondary products, however, use of the rendering plant was discontinued in late 2016.

As additional properties were added to the TAB operations, relevant existing infrastructure was either retained (internal farm access, dams) or removed (nursery infrastructure, poultry houses, farm worker accommodation of poor quality).

The properties:

As indicated, Caine Farming (Pty) Ltd, acquired a number of properties over time to support and supplement the feedlot, and later the abattoir. The table below indicates the year of acquisition, the use of the property, and the possible transgression of EIA triggers, while the map below illustrates the landholding of Triple A Beef.



Map 1: Locality Map of Triple A Beef

Triple A Beef							
Schedule of Properties							
Albert Falls, uMthswathi Local Municipality, Umgungundlovu District Municipality							
Year of Purchase	Property Description	SG Code	Latitude Deg, Min, Sec	Longitude Deg, Min, Sec	Extent	Use	Possible Contraventions
1980	Ptn 8 of Shallow Drift No 15565 (changed from 2051)	NOFT00000001556500008	29°27'40.90"S	30°26'28.38"E	129.1830ha	Feedlot;	<ul style="list-style-type: none"> • 2006 onwards extension of feedlot pens: density & numbers, LN1 39(1);
						admin buildings; feed preparation;	<ul style="list-style-type: none"> • Extension of agri-industrial facilities, LN1 43
						hospital;	<ul style="list-style-type: none"> • waste water treatment ponds
						adjustment pens; workshop; 1987 - waste water treatment ponds; 2006-2010 feedlot extension and additional waste water treatment ponds; 2015 further extension of feedlot pens	
1991	Ptn 28 of Shallow Drift No 15565 (changed from 2051)	NOFT00000001556500028	29°28'4.07"S	30°26'53.62"E	125.1149ha	Feedlot;	<ul style="list-style-type: none"> • Expansion of abattoir
						Raw water ponds;	<ul style="list-style-type: none"> • Rendering plant (Sch II APPA)(rendering plant out of use/dysfunctional since 2016)
						2001 abattoir;	<ul style="list-style-type: none"> • Extension of feedlot pens
						2006-2010 feedlot extension and additional waste water treatment ponds; expansion of abattoir	
1995	Ptn 1 of Binchester Grange No 14258	NOFT00000001425800001	29°28'39.75"S	30°26'55.09"E	125.6206ha	2010 centre pivot; Irrigated effluent; Fodder production	
2007	Ptn 25 of Shallow Drift No. 15565	NOFT00000001556500025	29°28'27.92"S	30°26'25.45"E	55.4986ha	Hay/Fodder production	
2008	Ptn 20 of Wagenbeeijes Draai No. 875	NOFT0000000087500020	29°27'36.18"S	30°28'33.79"E	144.8455ha	1 st centre pivot 2010;	
						2 nd centre pivot 2012; Irrigated effluent; Fodder production	
2009	Ptn 46 of Wagenbeeijes Draai No. 875	NOFT0000000087500046	29°27'28.03"S	30°27'52.87"E	104.4855ha	Centre pivots 2013-2014; Irrigated effluent; Fodder production	
2009	Ptn 7 of Shallow Drift No. 15565	NOFT00000001556500007	29°27'20.49"S	30°26'48.77"E	32.1610ha	Fodder production	
2009	Ptn 1 of Linchester No. 15875	NOFT00000001587500001	29°28'39.14"S	30°27'17.79"E	59.6988ha	2010 clearing of bush encroachment; establishment of new land; Fodder production	
2014	Ptn 9 of Shallow Drift No. 15565	NOFT00000001556500009	29°27'38.76"S	30°26'58.32"E	20.4641ha	Fodder production; Calf rearing	
2014	Ptn 10 of Shallow Drift No. 15565	NOFT00000001556500010	29°27'44.92"S	30°27'10.86"E	25.5255ha	Fodder production; 2015 centre pivot over disturbed lands	
2014	Ptn 11 of Shallow Drift No. 15565	NOFT00000001556500011	29°28'1.88"S	30°27'21.97"E	46.1611ha	Processing (ex-abattoir, existing buildings); 2014 - 2015 removal of sheds	
2014	Ptn 12 of Shallow Drift No. 15565	NOFT00000001556500012	29°27'38.93"S	30°27'21.61"E	20.4760ha	2015 removal of Top Crop infrastructure & sheds; 2015 pasture establishment, centre pivot	
2015	Ptn 51 of Zeekoegat No. 1173 (also known as Ptn 1 (of 18) of Zeekoegat No. 15565)	NOFT00000000117300051	29°28'25.44"S	30°26'1.34"E	56.8348ha	2014 centre pivot;	
						Irrigated effluent; Fodder production	

Project description:

The Triple A Beef Feedlot was established in 1981 prior to the requirement for environmental authorisation, with guidance at the time from the Department of Agriculture and the Department of Water and Forestry. The onsite abattoir was established in 2001 under environmental authorisation granted EIA/1429.

The development of the feedlot and abattoir included the establishment of:

- cattle handling facilities
- feedlot pens with their drinking and feeding troughs,
- agri-industrial buildings for reception, administration, feed processing and production, staff facilities
- abattoir including slaughter, processing, offices, staff facilities, cold- and freezer rooms. A rendering plant was constructed however it has not been in use since 2016
- offchannel raw water storage dams
- waste water treatment dams for the feedlot and abattoir

Limited quantities of general waste would have been produced during the construction phases. Most of this waste would have been rubble, empty cement bags, wood off cuts and fencing material.

There are a number of waste streams associated with the operational phase of the TAB activities:

- Office/domestic

This includes waste paper, ink cartridges, obsolete or broken office furniture and equipment which is largely removed to municipal landfill

- Feedlot:

This includes empty medicine vials, used syringes and needles which are removed by a company specialising in medical waste removal (Rent-O-Kill). Manure and urine are washed down. Manure is removed to a central collection point and mixed with paunch content from the abattoir to be spread on the lands or sold to surrounding farmers as fertilizer. Urine and wash water from the feed and drinking troughs is directed to treatment ponds (either Triple Dams on the southern side of the feedlot, or D73 dams on the northern side), and then pumped into the 2nd of 10 maturation ponds that treat abattoir effluent.

- Abattoir:

Other than office/domestic waste described above, the only solid waste is paunch content which is mixed with the manure from the feedlot to either apply to TAB lands or sold to nearby farmers as fertilizer.

- Farm

Empty agri-chemical containers are disposed of in accordance with manufacturer specifications (they are removed from site by suppliers) while used oil is collected by Ndlekangco Oil Collections for treatment off-site.

The capacity of TAB has grown to a herd of average 30 to 32 000 cattle and an average throughput of 500 cattle per day five days a week in the abattoir with a maximum of 550 cattle per day allowed by Veterinary Public Health certificates.

Runoff from the feedlot pens is directed to either the four D73 offchannel storage dams (total capacity 78 000m³) on the northern side of the feedlot or to the three offchannel Triple Dams (total capacity 67 000m³) on the southern side of the feedlot. Each of the dams gravity feed to the dam below. Water from the lowermost dam is pumped to the 2nd maturation pond. See the plan below.



Figure 29 Location of Feedlot Runoff Off-Channel Catchment Dams on Caine Farming Properties

Effluent from the abattoir is directed to a series of ten offchannel maturation ponds, the first five ponds are anaerobic and the second five are aerobic. Treated water from the tenth dam is pumped to Back Dam (near the R614) and Wondervale (adjacent to the D73 near the former poultry farm), or directly to lands for irrigation.

TAB is a major economic driver in the uMshwathi Local Municipality producing very high quality beef products. The direct workforce has grown from 110 in 2001 to 538 employees in 2017 and currently 715 employees with each employee supporting an average of 5-10 dependents. The majority of the workforce is drawn from Mpolweni. Employees are provided with training and opportunities to advance or improve their position within the company.

TAB ensures food security through the supply of red meat and value-for-money products such as offal and heads. It also supports a range of upstream and downstream businesses and industries such as vehicle fleet, packaging, beef farmers, distribution agencies, leather production and pet food production. TAB also supplies local butcheries thereby facilitating the growth of these enterprises and ensuring food security for the local community.

TAB is the biggest private commercial feedlot in KwaZulu-Natal with its own on-site abattoir. It is central to the continued supply of red meat (beef) products to consumers in KwaZulu-Natal as well as neighbouring provinces as it is able to continue to produce even during times of disease because of the stringent biosecurity protocols in place and the size of the herd. The feedlot herd is drawn from beef farmers in KwaZulu-Natal and Free State providing these farmers with an assured income for their cattle provided they maintain their herds' health with appropriate health and safety protocols in place. There is a network of suppliers providing goods and services to TAB, including vehicles and fleet maintenance, materials for the feedlot pens, packaging and cleaning materials for an average

slaughter rate of 500 cattle per day (allowed up to 550 per day under veterinary certificates). TAB is a key client for these suppliers, some of whom would not continue to be in business if it were not for TAB.

New and existing employees are given training to equip them with improved technical skills including cattle handling, abattoir functions, meat processing, administration, workshop/mechanical, machinery operation, and general farming methods with specialisation in irrigation and waste water disposal to land.

The costs of production and distribution of products to consumers is such that TAB is ideally located in KZN to ensure equitable costs across KZN, particularly with ease of access from the primary corridors of R614 and R33 to the N3.

Legislation:

Environmental Authorisation following a Basic Assessment process was required for the expansion of the feedlot and abattoir as the following National Environmental Management Act, 1998, (NEMA) EIA listed activities (2010 – present) were triggered:

- expansion of the feedlot through the construction of new pens, activities 4(i) and 39(i);
- expansion of the abattoir, activities 38(ii) and 43;
- consolidation of fuel storage, activity 51; and
- expansion of waste water maturation ponds, activity 56.

The construction of the rendering plant in 2005 fell under the Environment Conservation Act, 1989 (ECA) EIA regulations (activity 9) as an interpreted Schedule II activity under the Atmospheric Pollution Prevent Act, 1965. Use of the rendering plant was discontinued in late 2016.

Section 24G of the National Environmental Management Act, 1998, recognises that there are instances when developments may not have the necessary prior authorisation and provides a mechanism whereby post-facto environmental authorisation may be granted after following a regulated process.

The table below illustrates the different approvals that are held by TAB:

LEGISLATION	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorization/comment	DATE
EIA Regulations, 1997	KZN Environmental Affairs	Authorisation abattoir EIA/1429	25 August 2000
Town Planning Ordinance, 1949	KZN COGTA	PTB 2000/462(II) abattoir	14 March 2001
National Water Act, Act 36 of 1998	Dept Water & Sanitation	IWUL	14 December 2020, amended 5 & 25 October 2021
Meat Safety Act, Act 40 of 2000	KZN Dept Agriculture, VPH	Certificate of Registration	28 Aug 2012 (Renewed every 3 years, current valid to 31 March 2024)
Red Meat Regulations, 2004	KZN Dept Agriculture, VPH	Certificate of Veterinary Approved Facility, source of hides/skins for export	Renewed annually, current certificates valid to 05-04-2023
GN 638 of 2018	uMgungundlovu DM Community Services	Certificate of Acceptability of Food Premises (packing and transport)	Issued 15 October 2020

Spatial Planning & Land Use Management Act	uMshwathi LM	Zoning Certificate	22 June 2022
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POLICY/ GUIDELINES	ADMINISTERING AUTHORITY
ISO 22000/2018: Food Safety Management System	Certification Partner Global obo International Systems Organisation
Halaal Certificate	South African National Halaal Authority

Impacts associated with the expansion of TAB:

The feedlot was expanded through the addition of new pens over lands previously transformed to crops and secondary veld, as was the abattoir. Lands have been established with contours and soil conservation measures in place. These have proved sufficient to prevent erosion during the heavy rain events of April and May 2022. Lands are set back from wetlands and streams thereby ensuring the integrity of the buffers. These measures are regarded as adequate to prevent or minimise erosion and alien plant encroachment into pastures and hay lands.

The impacts associated with the expansion of the feedlot and abattoir may include noise, nuisance such as odours and flies, socio-economic, possible water contamination, and biodiversity. These are summarised below.

Impacts are assessed using a standard matrix of:

Duration: Short term (0-6 months) – Medium term (6 months – 3 years) – Long term (3 years or more)

Extent: Site – local – regional – provincial – national – international

Intensity: Low – medium – high

Frequency: Occasional – temporary – seasonal – permanent/ongoing

Reversibility: Unlikely – possible

Possible Impacts	Significance rating of impacts after mitigation (Low, Medium, Medium-High, High, Very High):
<p>Biodiversity TAB activities have been established on already transformed lands. Wetland and stream buffers are maintained. Hay lands and green fodder production attract and support endangered species such as oribi, grey crested cranes and blue cranes, southern bald ibis, amongst others. (long term; regional; low; ongoing; unlikely)</p>	<p>Low – medium (positive for cranes and oribi)</p>
<p>Socio-economic TAB provides housing and training for employees. There are many subsidiary businesses that are reliant on TAB, either in the supply of goods to TAB or the sale and distribution of products from TAB, all of which have numerous employees. TAB provides very high quality products: Hides for leather products Beef products for food security By-products for animal feed production (long term; national; high; ongoing; possible)</p>	<p>High – Very High positive</p>

<p>Sense of Place/heritage There are no known heritage resources on or near TAB operations. The visual screen of Johannesburg gold trees along the R33 reduces the intrusion of the feedlot into viewsheds as motorists pass by. (long term; local; low; ongoing; possible)</p>	<p>Low negative</p>
<p>Pollution/environmental degradation TAB has been established and expanded over existing lands and transformed ground. Pollution risks are associated with runoff from the feedlot pens and effluent from the abattoir, however the system of maturation ponds and disposal to lands as liquid fertilizer has proved adequate to prevent pollution of downstream water bodies and erosion during heavy rainfall events such as the April and May 2022 events. Any pollution event would of short duration and quickly remedied by mitigation measures as the reputational risk to TAB is too great to compromise. (short term; site-local; medium; occasional; possible)</p>	<p>Low-medium negative</p>
<p>Nuisance Hygiene is critical to the continued viability of the feedlot and abattoir. Fly traps are positioned to ensure minimal flies disturb the cattle in the feedlot. Manure is removed from the pens regularly as it provides substrate for diseases which would otherwise affect the health of the herd. The pens are continuously monitored for flies and herd health which reduces the nuisance to surrounding properties. (long term; local; low; ongoing; possible)</p>	<p>Low negative</p>

Public Participation:

This Background information Document is an invitation for you to provide comment on the application for Environmental Authorisation on or before 3 November 2022.

Copies of the application and assessment report will be lodged in the following places with effect from 13 October 2022 for a 20 day comment period (ie, on or before **3 November 2022**):

- Triple A Beef/Caine Farming Reception
- Electronically.

Prior arrangements must be made to view the documents due to biosecurity protocols using the contact information below.

Parties wishing to comment or register as Interested and Affected Parties are requested to send any concerns and comments on the application before **3 November 2022** to The Independent Environmental Advisor by email sarah.wine@iuncapped.co.za; facsimile 0862422646; PO Box 586, Howick 3290; or telephone 0719754865 attention Mr Barry James/Ms Sarah Allan.

Invitation to Register and Comment: before 3 November 2022

If you are interested in or affected by the application for environmental authorisation of the existing expansion of the Triple A Beef feedlot and abattoir to their current state in the Albert Falls area, uMshwathi Local Municipality, Umgungundlovu District Municipality, you are invited to register and submit your comments, stating any interest you have in this application (neighbour, competitor, supplier, authority) using the form below. Please forward the form to:

The Independent Environmental Advisor
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for attention Barry James/Sarah Allan.

**TRIPLE A BEEF
EXPANSION OF FEEDLOT AND ABATTOIR
APPLICATION FOR ENVIRONMENTAL AUTHORISATION
DC22/S24G/0006/2022**

Title (Mr/Ms/Mrs)		Phone	
Name		Fax	
Organisation/interest in application		Email	
Signature		Postal address	

I would like to raise the following issues/comments/concerns to be noted regarding the expansion of the feedlot and abattoir:

If you know of anyone else who may have an interest in this application, please may you provide their contact details so that their participation can be facilitated:

Name	
Organisation	
Tel	
Address	

Please note that The Independent Environmental Advisor adheres to the principles of the Protection of Personal Information Act, Act 4 of 2013. By signing this form, you acknowledge that TIEA may use your information for the sole purpose of Public Participation related to the project mentioned above.

Thank you!