

chapter 5

comments and responses trail



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5 COMMENTS AND RESPONSE TRAIL

5.1 IDENTIFICATION OF ISSUES

An important element of the Scoping process is to evaluate the issues raised through the Scoping interactions with authorities, the public, the specialists on the EIA team and the project proponent. In accordance with the philosophy of Integrated Environmental Management, it is important to focus the EIA on the key issues.

To assist in the identification of key issues, a decision-making process is applied to the issues raised, based on the following criteria (**Figure 5-1**):

- Whether or not the issue falls within the scope and responsibility of the Biofule Processing Plant EIA process; and
- Whether or not sufficient information is available to respond to the issue raised without further specialist investigation.

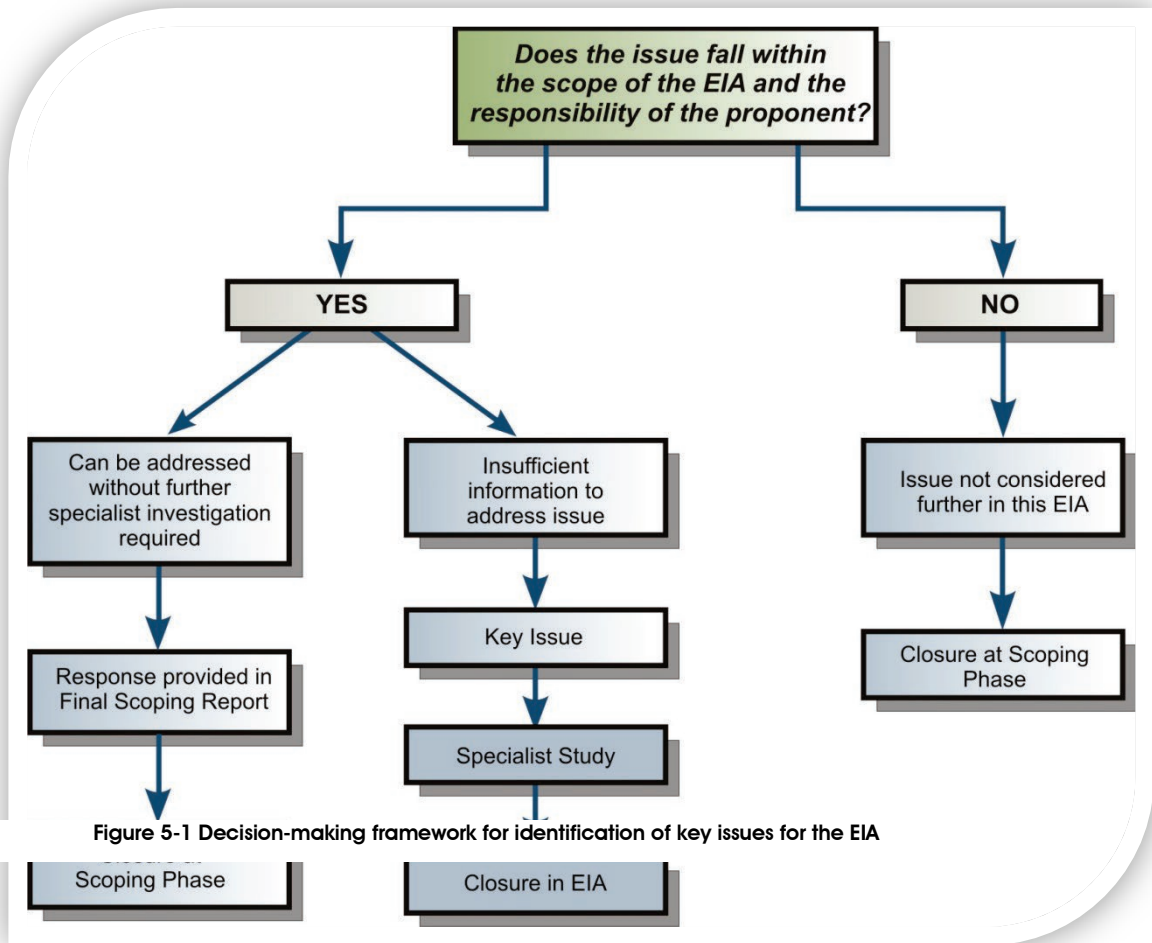
Issues were sourced by the EIA team from the following Scoping interactions:

- **Newspaper Advertisements Placed Prior to the release of the Draft Scoping Report** – In order to inform the public of the proposed project and invite members of the public to register as I&APs, and to inform the EIA consultant about specific issues or interests in the proposed project, the project and EIA process was advertised in one provincial and one regional newspaper.
- **Newspaper Advertisements Placed for the Review of the Draft Scoping Report** – In order to inform the public of the review of the Draft Scoping Report, the availability of the report for comment and inviting I&APs to attend the Public Meeting to be held, newspaper adverts were placed in one provincial and one regional newspaper.
- **Focus Group Meetings** held between the Public Participation Consultant and key I&AP groups, prior to the release of the Draft Scoping Report and during the review of the Draft Scoping Report.
- **Telephone** – issues raised by I&APs during telephonic consultations.
- **Letters and faxes** – issues sent to PPC via fax or posted correspondence.
- **Email** – issues sent to PPC via email correspondence.
- **Comment Form** – issues submitted to PPC via the Comment Form that was provided at the focus group meetings, and with Letter 1 and the BID mailed to I&APs prior to the release of the Draft Scoping Report. As well as issued submitted to PPC in response to Letter 2, which was mailed to all I&APs on the project database and included a comment form and executive summary of the Draft Scoping Report..
- **Public Meeting** – issues raised at the Public meeting held on the 22 June 2012, to which all I&APs were invited via Letter 2 and the newspaper advertisements placed.

The Appendices of the DSR contain the supporting meeting notes and detailed correspondence received. Comments received that are not relevant to or form part of this EIA process have not been included in the Issues Trail below, the detailed comments received are included in Appendix H. Section 5.2 below provides a summary of the comments received and they have been grouped according to the following categories (number in brackets indicates the number of issues raised):

- Potential Air Quality Impacts (8)
- Potential Socio-Economic Impacts (11)
- Potential Waste Management Impacts (4)
- Potential Visual Impacts (2)
- Potential Noise Impacts (1)
- Assessment of Alternatives (1)

- Potential Traffic Impacts (2)
- Potential Biosecurity Impacts (3)
- Potential Impacts of Hazardous Materials (3)
- Potential Impact on Vegetation (1)
- Project Detail (12)
- EIA and Public Participation (10)
- General and Project Motivation (8)



5.2 COMMENTS AND RESPONSES TRAIL

The tables below summarize issues raised prior to the release of the Draft Scoping Report for I&AP review as well as during the review period of the Draft Scoping Report, together with a response from the EIA team. A synthesis of issues to be addressed in the Specialist Studies is provided in the Plan of Study for EIA (Chapter 6). The results of the Specialist Studies will be made available to I&APs for comment as part of the Draft EIA Report. All comments received prior to the release of the Final Scoping Report, through meetings and written correspondence are attached as Appendices to this report.

5.2.1 Potential impacts on air quality

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	We appreciate the study on air quality to minimize the negative impacts of air quality on communities.	Kiki Dyimi, SANCO	8 May2012, focus group	CSIR: Noted
	What will be the impact on air quality as a result of this project? What emissions are anticipated from the project?	Ntombizodwa Zothani, SACP Coordinator	11 May2012, focus group	CSIR: It is not anticipated to have any atmospheric emissions from either the processing plant nor chemical storage facilities. A specialist atmospheric emissions study has, however, been commissioned as part of the EIA process to assess the potential impacts of atmospheric emissions, especially with regard to the storage of volatile chemicals.
	The Air Quality specialist assessment and draft EIA needs to indicate the methods and controls that will be used for the delivery and unloading of the hexane for storage.	Patrick Nodwele, NMBM Air Quality, Sub Directorate	1 June2012, Focus group	CSIR: Noted
	The size of the methanol and hexanol tanks must be specified in the EIA and Air Quality specialist assessment.	Patrick Nodwele, NMBM Air Quality, Sub Directorate	1 June2012, Focus group	CSIR: Noted
	Will dust be generated by the initial pressing process of the canola?	Patrick Nodwele, NMBM Air Quality, Sub Directorate	1 June2012, Focus group	PhytoAmandla: No dust is generated from the pre-pressing process.
	The Air Quality specialist assessment and draft EIA needs to provide a clear outline of the Biofuels production process, which should include the various processes, all inputs and outputs for each process component. Included in this should be a description of the methods /equipment used for the management of emissions.	Patrick Nodwele, NMBM Air Quality, Sub Directorate	1 June2012, Focus group	CSIR: Noted PhytoAmandla: Noted
	Where there is information lacking on the process description, information that is available from an existing plant should be used and this should be included in the AEL application.	Templeton Titima, NMBM Air Quality, Sub Directorate	1 June2012, Focus group	PhytoAmandla: Noted
	As organic materials are	Dr Paul Martin, Private	8 July2012,	CSIR:

involved, there will presumably be odour problems. Will this be assessed and how will it be mitigated?	email	This issue will be assessed as part of the Atmospheric Emissions specialist study that will form part of the EIA report.
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5.2.2 Potential socio-economic impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	We encourage job creation. Will the project involve small businesses in the development	Kiki Dyimi, SANCO	8 May2012, focus group	PhytoAmandla: Yes, for example for maintenance, housekeeping, security, technical services, office services, catering,
	How will the project involve small, medium and micro-enterprises?	Noxolo Sume, NAFCOC Secretary	9 May2012, Focus Group	PhytoAmandla: See above
	What will be the economic benefits of the project for communities?	Mongameli Peter, SANGOCO Regional Secretary	10 May2012, Focus Group	PhytoAmandla: The project will create jobs as well as governmental tax.
	How many job opportunities will be created as a result of this development?	Ntombizodwa Zothani, SACP Coordinator	11 May2012, focus group	PhytoAmandla: For the plant approximately 200 jobs and in farming approximately 25.000 jobs.
	We support the development as long as it will create job opportunities for the area of Wells Estate in particular. What will the specific benefits for the area of Wells Estate be for job creation on completion of the EIA process?	Clr. Mafana, Ward 60 Wells Estate	16 May2012, focus group	PhytoAmandla: The project will create job opportunities.
	Employment opportunities as a result of the project must benefit all the communities in Wells Estate as a directly affected area.	Nontando Nikani, Branch Executive Committee Member, Ward 60	16 May2012, focus group	PhytoAmandla: Noted
	We would appreciate the involvement of Small Businesses in the development.	Cll Hote, COPE Chairperson	29June2012, focus group	PhytoAmandla: Noted
	The identification of skills required for the project and the need for skills transfer is recommended for the empowerment of small businesses in order for them to benefit from this project.	Cll Hote, COPE Chairperson	29June2012, focus group	PhytoAmandla: Noted

<p>IDZ tenants are required to adhere to Coega's Zone Labour Agreement and this must be elaborated on in the Draft and Final EIA as well as the EMP. In this manner this then becomes binding on the developer.</p>	<p>Andrea von Holdt, Coega Development Corporation</p>	<p>22June2012, Public Meeting</p>	<p>CSIR: Noted. A summarising overview of the Zone Labour Agreement has been added to Section 3.4 of this report and will be further elaborated on in the EIA report.</p>
<p>The specific labour requirements of the project should be identified and elaborated on in the EIA phase of the assessment. There are 3 components to the EIA process, biophysical, social and economic; too often the focus is on the biophysical and not socio-economic.</p>	<p>Andrea von Holdt, Coega Development Corporation</p>	<p>22June2012, Public Meeting</p>	<p>CSIR: Noted. For this reason the Zone Labour Agreement will be elaborated on in the EIA report and included in the EMP.</p> <p>PhytoAmandla: Noted</p>
<p>The project appears to be quite technical, how do you propose to use local labour?</p>	<p>Primrose Madikizela, Transnet</p>	<p>22June2012, Public Meeting</p>	<p>PhytoAmandla: Local people will be trained already from the construction phase to develop skilled workers.</p>

5.2.3 Potential Waste Management Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<p>Where will the waste generated by this project be disposed of?</p>	<p>Mongameli Peter, SANGOCO Regional Secretary</p>	<p>10 May2012, Focus Group</p>	<p>CSIR: Solid waste from the processing plant will predominantly be ash and biological sludge from the biogas plant. The use of the sludge and ash as agricultural fertilisers is currently being investigated.</p> <p>Cleaned process water from the plant will be fed into the municipal waste water system A waste management specialist study will be conducted as part of the impact assessment phase of the project to address this issue in more detail.</p>
	<p>Where will waste that is produced by the project be disposed of?</p>	<p>Ntombizodwa Zothani, SACP Coordinator</p>	<p>11May2012, Focus group</p>	<p>CSIR: See above</p>
	<p>If the waste is not registered as a fertiliser what are the quantities of waste that will be produced by the project?</p>	<p>Primrose Madikizela, Transnet</p>	<p>22June2012, Public Meeting</p>	<p>PhytoAmandla: Nearly 2 t ash per day Nearly 15 t biological sludge (Dry Mass) per day.</p>
	<p>If the waste is registered as a fertiliser will this be given to SMME's to create economic opportunities?</p>	<p>Primrose Madikizela, Transnet</p>	<p>22June2012, Public Meeting</p>	<p>PhytoAmandla: The fertilizer will be sold, preferably to one off-taker.</p>

5.2.4 Potential Visual Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Will there be silos at the IDZ site for the storage of canola seed? If yes, how many and how big will these be? SANParks' concern would be the visual impacts on the silos on Addo Elephant National Park.	Ane Oosthuizen, SANParks	29 May2012, Focus Group	PhytoAmandla: Silos for onsite canola storage are planned with a capacity of 100 000 t. Silo height is estimated at approximately 30 m.
	Developments in the IDZ are supposed to limit visual impacts, e.g. by choice of exterior paint colour, architectural design, etc. Many developments in the IDZ to date have not done this. How will this IDZ RoD requirement be complied with?	Dr Paul Martin, Private	8July2012, email	PhytoAmandla: IDZ will need to provide requirements to be written into the EMP and eventually into the Environmental Authorisation.

5.2.5 Potential Noise Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	The noise assessment study will assist the Health Department of the NMBM in ensuring noise impacts are within the acceptable by-law limits for the area.	Templeton Titima, NMBM Air Quality, Sub Directorate	1June2012, Focus group	CSIR: A noise specialist study is being conducted as part of the EIA process.

5.2.6 Assessment of Alternatives

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	An alternative pipeline routing needs to be identified, the route along the N2 is too long and one of the routes cuts through the Coega Open Space Management system and in all likelihood would not receive approval.	Andrea von Holdt, Coega Development Corporation	22June2012, Public Meeting	CSIR: During the EIA it will be advised that the pipeline routing alternative through the Coega Open Space Management system be abandoned. PhytoAmandla: The pipeline routes are supposed to be in existing CDC and Transnet servitudes.

5.2.7 Potential Traffic Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Do you know the ratio of truck versus rail for the transport of the seed? If rail is not available how many trucks would be required to transport the seed?	Andrea von Holdt, Coega Development Corporation	22June2012, Public Meeting	PhytoAmandla: The plant will be designed to cope with 100 % of feedstock to be delivered by either road or rail. The target is for 100 % to be delivered by rail. Seed transport without rail is a theoretical assumption only, and in this case nearly 5 trucks per hour will arrive at the plant.
	In a case where there is a strike and rail cannot be used what is the estimated truck traffic required by the project?	Primrose Madikizela, Transnet	22June2012, Public Meeting	PhytoAmandla: See response above; buffer capacities in the form of onsite stored feedstock will avoid short term bottlenecks.

5.2.8 Potential Biosecurity Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Bringing in canola feedstock from several parts of SA could introduce rodents and pests from other areas – is this a risk that will be assessed?	Dr Paul Martin, Private	8July2012, email	PhytoAmandla: No, it will not be assessed, but rodents and pests will be controlled in the seed silos and on site.
	Having organic feedstock & cake on site will attract rodents, especially exotic rodents (mice & rats). The Port has a no-poison policy, CDC encourages no-poison solutions and the IDZ RoDs require rodent control systems that are complementary.	Dr Paul Martin, Private	8July2012, email	PhytoAmandla: Specialists for rodents and other pest will provide us in case it is happened.
	How will PhytoAmandla prevent rodents accessing potential food sources and how will it monitor and control rodents on	Dr Paul Martin, Private	8July2012, email	PhytoAmandla: See above.

and around its premises?			
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5.2.9 Potential Impact of Hazardous Materials

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	What permits are required for the handling, storage and transportation of hazardous materials and will a Hazardous Installation permit be required?	Dr Paul Martin, Private	8 July 2012, email	<p>CSIR: The need for a Hazardous Installation permit will be determined during the course of the EIA process, especially by the Atmospheric Emissions specialist study.</p> <p>An atmospheric emissions license application is currently underway for the project.</p>
	Presumably emergency plans will be in place in case of spills and accidents.	Dr Paul Martin, Private	8 July 2012, email	<p>CSIR: Will form part of the Hazardous Installation Permit application, if needed.</p> <p>PhytoAmandla: General emergency spill plans will also be in place as part of company policy.</p>
	Has NMBM adequate emergency and fire response capacity to deal with this facility (cumulative impacts of facilities planned for the IDZ may outstrip NMBM's capacity)?	Dr Paul Martin, Private	8 July 2012, email	<p>CSIR: Will also form part of the Hazardous Installation Permit application, if needed.</p>

5.2.10 Potential Impacts on Vegetation

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Impacts on the open space system will presumably be assessed with regards to the routing of pipelines to the tank farm	Dr Paul Martin, Private	8 July 2012, email	<p>CSIR: Correct</p>

5.2.11 Project Detail

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	What other products will be produced by the project for human consumption?	Cllr Nkosiyapantsi, Motherwell Environmental Forum	9 May2012, Focus Group	PhytoAmandla: The planting of canola in rotation with food crops will increases the agricultural food production. Meal that can be used for animal feed will also be produced.
	When will this project start to operate?	Noxolo Sume, NAFCOC Secretary	9 May2012, Focus Group	PhytoAmandla: In 2015 (first train 50% capacity; train 2 one year later)
	What other products could be produced by the development for human consumption?	Mongameli Peter, SANGOCO Regional Secretary	10 May2012, Focus Group	PhytoAmandla: The planting of canola in rotation with food crops will increases the agricultural food production and meal that can be used animal feed will be produced from the processing plant.
	Will there be any additional local farms or communities that may benefit as a result of the project, such as identifying co-operatives to supply the canola seed?	Ntombizodwa Zothani, SACP Coordinator	11 May2012, focus group	PhytoAmandla: Around 1,1 Mio tons of canola feedstock will annually be needed when the plant is operating at full capacity. This will mean an annual production area of 500,000 ha will be needed, from which local farms and communities will greatly benefit.
	Is the proposed project comparable to an oil refinery?	Dave Louw, Cerebos	23 May2012, focus group	PhytoAmandla: No. The processing plant is only a canola seed crushing unit combined with a degumming unit. The plant oil will be fed into a transesterification unit.
	Is this a fractionation process to produce the biofuel?	Patrick Hill, Cerebos	23 May2012, focus group	PhytoAmandla: No, it is only an oil crushing unit combined with a tranesterification unit
	It is the process used flammable or explosive in any manner?	Patrick Hill, Cerebos	23 May2012, focus group	PhytoAmandla: Yes, methanol and hexane are explosive. But the used technology is saved and will be built to a high security standard.
	Do you add anything to the meal in order to pelletise the meal and what kinds of animals eat the meal?	Andrea von Holdt, Coega Development Corporation	22June2012, Public Meeting	PhytoAmandla: Only water is added to the meal which can be fed to cattle, sheep, goats, pigs, etc.
	Is there a market in SA for Biofuel?	Andrea von Holdt, Coega Development Corporation	22June2012, Public Meeting	PhytoAmandla: Blending regulations for Biofuel (both ethanol and Biodiesel) are still under discussion in RSA. The targeted market for PhytoAmandla is thus Europe.
	SA is a water scarce country; you propose to use potable water for your	Primrose Madikizela, Transnet	22June2012, Public Meeting	CSIR: Currently CDC can only provide potable water from the NMBM.

	project, where will this water come from?			CDC has, however, indicated that as soon as sufficient industry is operational in the IDZ it would establish its own water treatment facility in the IDZ. This could lead to recycled water being available for industrial use in the IDZ. Depending on the quality, PhytoAmandla will consider making use of such recycled water.
	What other countries produce biofuel?	Primrose Madikizela, Transnet	22 June 2012, Public Meeting	PhytoAmandla: Main producers are in Europe, South- and Northern America and South- East Asia In Germany alone a production capacity of 5 Mio t/a is installed.
	Water recycling & energy conservation is mentioned in the Scoping Report. What other green building systems are planned for this development?	Dr Paul Martin, Private	8 July 2012, email	PhytoAmandla: Solar panels are planned on all roofs while thermal and electrical energy will be generated from process waste natural materials in the biogas facility.

5.2.12 EIA and Public Participation

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	The main concerns SANParks has with this project would be the impact on increased shipping to meet the export requirements of the project, and the impact increased shipping would have on the marine environment. We would want to know the number and types of ships required. If this EIA does not assess the impacts of increased shipping the OTGC EIA must ensure that the risks associated with increased shipping are addressed. The OTGC EIA must specify the number and types of ships required by PhytoAmandla and the potential impacts on the marine environment.	Ane Oosthuizen, SANParks	29 May 2012, Focus Group	CSIR: The offsite storage and loading of ships will be the responsibility of the tank farm operator. The assessment of the marine environment does, therefore, not fall within the scope of this EIA. These impacts will, however, be assessed as part of the Tank Farm's EIA
	Once we have more detail on the project we will be able to provide more meaningful input.	Aphiwe Bewana, SANParks	29 May 2012, Focus Group	Public Process Consultants: The Draft Scoping Report will provide more information on the project. SANParks will remain on the project I&AP database and be notified of the review period for the Draft Scoping Report.
	Besides the canola meal what	Noxolo Sume,	9 May 2012,	PhytoAmandla:

other products are used to produce the diesel and are they environmentally friendly.	NAFCOC Secretary	Focus Group	Biodiesel, Canola Meal, Salt (could be used as fertilizer); ashes and sludge (possible fertilizers).
Besides the canola meal, what other products are used in the production process to produce the fuel. Is there a specialist assessment that will identify these products and outline their impact on the environment?	Mongameli Peter, SANGOCO Regional Secretary	10May2012, Focus Group	CSIR: Dangerous chemicals will be utilised in the processing plant. No specific study to assess the individual chemicals are included as part of the EIA. Since the project triggers the listed activity pertaining to the storage of dangerous goods the storage of chemicals will be assessed in general by the EAP. The air emission specialist will also assess the storage and use of chemical as to determine any possible emissions.
Is it possible to obtain a process flow diagram so that we are able to provide meaningful comment on the project?	Dave Louw, Cerebos	23 May 2012, focus group	PhytoAmandla: Such a diagram is under development. A process flow diagram will be available during the Basic Engineering phase.
We will provide more detailed comment once there is more information available on the project and what the production process will entail.	John Drinkwater, Cerebos	23May2012, focus group	Public Process Consultants: The Draft Scoping Report and EIA report will provide more information on the project. Cerebos will remain on the project I&AP database and be notified of the review period for the Draft Scoping Report.
This serves as confirmation that your application has been captured in our electronic AgriLand tracking and management system. It is strongly recommended that you use the on-line AgriLand application facility in future.	JH Buys, Director Land Use and Soil Management, National Dept of Agriculture		Public Process Consultants: Noted
I have read the notes/ minutes. There is only one thing that I have noted to be corrected is: Methane into Methanol, otherwise the rest is okay according to my assessment.	Busiwe Zungu Environmental Health Practitioner: Air Pollution and Noise Control, NMBM	12June2012, email	Public Process Consultants: As per the email received a correction was made to the notes from the focus group meeting.
Best Practise: Is the latest best practise technology being used in this development? Please provide basic details under project description in the EIA.	Dr Paul Martin, Private	8July2012, email	PhytoAmandla: The basic technology is described in the Scoping Report Section 2.2.1

	<p>Could you please provide me with information regarding the abovementioned application?</p> <ul style="list-style-type: none"> ▪ The area in hectares to be occupied by the proposed project. ▪ The total area of the property ▪ A clear locality and layout plan. 	<p>Sambulo Mnguni, Depart of Agriculture, Forestry and Fisheries, Land Use and Soil Management</p>	<p>20July2012, email</p>	<p>Public Process Consultants:</p> <p>The Scoping and EIA process for the PhytoAmandla Biofuels processing plant is located in the Coega Industrial Development Zone near Port Elizabeth. A site of approximately 25 ha in zone 5 of the Coega IDZ, which is zoned for high intensity industrial activities, has been allocated for the construction of the Biofuel Processing Plant. Kindly note, that this EIA process is for the construction of a Biofuels Processing Plant only. For your information I have attached a copy of Appendix B of the Draft Scoping Report which indicates the locality of the project within Zone 5 of the Coega IDZ. At this stage of the Scoping and EIA process a layout plan for the plant is not yet available and will, amongst others, be determined by the outcome of the specialist studies undertaken for the EIA phase of the assessment.</p> <p>Kindly note that the canola feedstock for the project, will utilise <u>existing</u> agricultural land which will be grown as a winter crop in rotation with summer food crops. As existing agricultural land is to be utilised on a rotational basis, no expansion of agricultural land is proposed and therefore this component of the project is not included in this Scoping and EIA process.</p>
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5.2.13 General and project motivation

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	We appreciate and welcome the development. We will disseminate the information to all committee members.	Cllr Nkosiyapantsi, Motherwell Environmental Forum	9 May2012, Focus Group	Public Process Consultants: This comment is noted. A focus group meeting will be held with the Motherwell Environmental Forum during the review of the Draft EIA.
	The information provided will be shared with the executive committee for further comments.	Noxolo Sume, NAFCOC Secretary	9 May2012, Focus Group	Public Process Consultants: This comment is noted, no further comments were received from NAFCOC.
	We welcome and support the development as it is part of a global initiative to minimize the impacts of climate change and produce cleaner fuel.	Mongameli Peter, SANGOCO Regional Secretary	10 May2012, Focus Group	CSIR: Noted
	There is no information in the area on recruitment and placement for IDZ projects.	Cllr. Mafana, Ward 60 Wells Estate	16 May2012, focus group	PhytoAmandla: Noted
	The recruitment, placement and information sharing on development in the Coega IDZ must be done in liaison with offices of the councillors.	Nontando Nikani, Branch Executive Committee Member, Ward 60	16 May2012, focus group	PhytoAmandla: Noted
	Job creation is encouraged and should be spread throughout the area of Motherwell making use of the office of the Councillor. The Councillors office must be given a quota on any employment opportunity that is available in the Coega IDZ.	Cllr Frans, Secretary, Motherwell Councillors Form	19 May2012, focus group	PhytoAmandla: Noted
	The project is welcome as it a clean fuel production process and contributes towards the environment.	Cllr Frans, Secretary, Motherwell Councillors Form	19 May2012, focus group	PhytoAmandla: Noted
	If there was someone with a specific commercial interest in establishing a pelletising plant adjacent to the Biofuels project could they construct such a facility?	Piet Le Roux, MC Design	22June2012, Public Meeting	PhytoAmandla: Actually, a pelletizing unit for the canola meal is considered in the PhytoAmandla plant. From Phyto's side, there are no objections against other pelletizing projects.