



**REFERENCE NUMBER:** 16/3/3/1/A8/49/3060/21  
**NEAS REFERENCE NUMBER:** WCP/EIA/0001013/2021  
**ENQUIRIES:** Ms. N. Wookey  
**DATE OF ISSUE:** 23 May 2022

The Director  
Maltento (Pty) Ltd.  
19 Moody Avenue  
**EPPING**  
7460

**For Attention: Mr. D. Smorenburg**

Cell: (071) 111 2154

Email: [Dean.Smorenburg@maltento.com](mailto:Dean.Smorenburg@maltento.com)

Dear Sir

**APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED EXPANSION OF THE EXISTING MALTENTO FACILITY ON ERF 32429, EPPING INDUSTRIA 1.**

1. With reference to the above application, the Department hereby notifies you of its decision to **grant** Environmental Authorisation, attached herewith, together with the reasons for the decision.
2. In terms of Regulation 4 of the Environmental Impact Assessment Regulations, 2014 (as amended), you are instructed to ensure, within 14 days of the date of the decision on the application, that all registered interested and affected parties ("I&APs") are provided with access to the decision and reasons for the decision, and that all registered I&APs are notified of their right to appeal.
3. Your attention is drawn to Chapter 2 of the National Appeal Regulations, 2014 (as amended), which prescribes the appeal procedure to be followed. This procedure is summarised in the Environmental Authorisation below.

Yours faithfully

**MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

Copies to: (1) Ms. M. Stewart (City of Cape Town: ERM)  
(2) Mr. J. Grobler (Landowner)  
(3) Ms. J. Fincham (WSP Group Africa (Pty) Ltd.)  
(4) Mr. I. Gildenhuis / Ms. L. Matthys (City of Cape Town)  
  
(5) Mr. P. Harmse (DEA&DP: Air Quality)

Email: [Maurietta.Stewart@capetown.gov.za](mailto:Maurietta.Stewart@capetown.gov.za)  
Email: [JGrobler@growthpoint.co.za](mailto:JGrobler@growthpoint.co.za)  
Email: [Jacqui.Fincham@wsp.com](mailto:Jacqui.Fincham@wsp.com) / [Robert.Els@wsp.com](mailto:Robert.Els@wsp.com)  
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## ENVIRONMENTAL AUTHORISATION

### APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED): THE PROPOSED EXPANSION OF THE EXISTING MALTENTO FACILITY ON ERF 32429, EPPING INDUSTRIA 1.

With reference to your application for the abovementioned, find below the outcome with respect to this application.

#### DECISION

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended), the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the listed activity specified in section B below with respect to the Preferred Alternative, described in the Basic Assessment Report ("BAR"), dated 26 January 2022.

#### A. DETAILS OF THE HOLDER FOR THIS ENVIRONMENTAL AUTHORISATION

The Director  
% Mr. Dean Smorenburg  
Maltento (Pty) Ltd.  
19 Moody Avenue  
**EPPING**  
7460

Tel: (071) 111 2154  
Email: [Dean.Smorenburg@maltento.com](mailto:Dean.Smorenburg@maltento.com)

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

## B. LISTED ACTIVITIES AUTHORISED

Listed Activity	Activity / Project Description
<p>Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended):</p> <p>Activity Number: 34 Activity Description:</p> <p><i>The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution, excluding—</i></p> <p><i>(i) where the facility, infrastructure, process or activity is included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies;</i></p> <p><i>(ii) the expansion of existing facilities or infrastructure for the treatment of effluent, wastewater, polluted water or sewage where the capacity will be increased by less than 15 000 cubic metres per day; or</i></p> <p><i>(iii) the expansion is directly related to aquaculture facilities or infrastructure where the wastewater discharge capacity will be increased by 50 cubic meters or less per day.</i></p>	<p>The proposed expansion of the existing development on Erf 32429, Epping Industria 1 will entail the facility processing more than 1 ton of animal matter (i.e. larvae) per day and will require the need for a permit or licence in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004).</p>

The abovementioned is hereinafter referred to as “**the listed activity**”.

The holder is herein authorized to undertake the following alternative that includes the listed activity as it relates to the proposed expansion:

The proposed expansion entails the expansion of the existing Maltento facility and associated infrastructure on Erf 32429, Epping Industria 1.

The existing facility was established in 2019 and makes use of insect technology by means of the dehydration of the black soldier fly larvae (that feed on brewer's by-products (i.e. spent grain, yeast etc.)) to produce nutritional pet and animal functional ingredients (animal feed). The existing facility processes less than 1 (one) tonne of live larvae per day and has therefore not required an Environmental Authorisation prior to the establishment of the existing facility. Products currently produced at the existing facility as follows:

- Primary product (i.e. Dried product – whole dried larvae); and
- Secondary products (i.e. liquid products and live products).

The proposed expansion to the existing facility will occur within the existing building/warehouse. Only the existing facility's operational footprint will expand. No expansion to the existing warehouse outside of the existing development footprint will occur. The existing building will be retro-fitted with infrastructure and divided into four climate-controlled iso-paneled bays as follows:

- Bay 1 – Controlled chambers for feed plant, grow out of larvae and breeding. The chambers will be ducted out to the atmosphere to ensure fresh air in the facility and insect grow rooms.
- Bay 2 – Grow rooms with a wash area for agri-bins, which recycles water for good hygiene purposes.
- Bay 3 – Processing plant, ablution facilities and canteen facility.
- Bay 4 – Product storage and dispatch area.

A maximum total processing capacity of approximately 20 tonnes of live larvae per annum will be established at full capacity. No additional municipal services will be required. Access to the site will be gained off Moody Avenue, Epping.

The production process will be as follows:

Raw materials (in the form of spent grain and yeast, fruit pulp, dry bran, so, maize and broiler pellets) will be delivered to the facility in agri-bins or bulk bags and will be temporarily stored within the facility prior to its use. Raw materials are then mixed and prepared and young larvae are added to each growth bin. Growth bins are then stacked and stored in a climate-controlled chamber. Once the larvae are ready to be harvested, the growth bins are discharged onto a conveyor belt to be separated. A portion of the harvested larvae are allowed to pupate into flies and kept for breeding purposes. The remainder of the harvested larvae are dried and packaged before distribution, minced into a liquid or sold as a live product.

### C. PROPERTY DESCRIPTION AND LOCATION

The listed activity will take place on the Erf 32429, Epping Industria 1.

The 21-digit Surveyor General code is:

Erf 32429, Epping Industria 1	C01600070003242900000
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The central co-ordinates for the proposed site are:

Middle point	33° 56' 02.33" South	18° 31' 24.41" East
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The above is hereinafter referred to as "**the site**".

Refer to **Annexure 1**: Locality Plan and **Annexure 2**: Site Development Plans and flow diagram of the production process.

### D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

WSP Group Africa (Pty) Ltd.  
 % Ms. J. Fincham  
 P.O. Box 2613  
**CAPE TOWN**  
 8000

Tel: (021) 481 8795  
 Cell: (082) 541 5038  
 Email: [Jacqui.Fincham@wsp.com](mailto:Jacqui.Fincham@wsp.com)

## E. CONDITIONS OF AUTHORISATION

### Scope of authorisation

1. The holder is authorised to undertake the listed activity specified in Section B above in accordance with and restricted to the Preferred Alternative described in Section B above and in the BAR dated 26 January 2022 on the site as described in Section C above.
2. The holder must commence with the listed activity on the site within a period of **five (5) years** from the date of issue of this Environmental Authorisation.
3. The development must be concluded within **ten (10) years** from the date of commencement of the listed activity.
4. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.
5. Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

### Written notice to the Competent Authority

6. A minimum of **seven (7)** calendar days' notice, in writing, must be given to the Competent Authority before commencement of development activity.
  - 6.1. The notice must make clear reference to the site details and EIA Reference number given above.
  - 6.2. The notice must also include proof of compliance with the following conditions described herein:

Conditions: 6, 7 and 11.

### Notification and administration of appeal

7. The holder must in writing, within **fourteen (14)** calendar days of the date of this decision–
  - 7.1. Notify all registered Interested and Affected Parties ("I&APs") of –
    - 7.1.1. the outcome of the application;
    - 7.1.2. the reasons for the decision as included in Section H;
    - 7.1.3. the date of the decision; and
    - 7.1.4. the date when the decision was issued.
  - 7.2. Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section F below;
  - 7.3. Draw the attention of all registered I&APs to the manner in which they may access the decision; and

7.4. Provide the registered I&APs with:

- 7.4.1. The name of the holder (entity) of this amended Environmental Authorisation;
- 7.4.2. The name of the responsible person for this amended Environmental Authorisation;
- 7.4.3. The postal address of the holder;
- 7.4.4. The telephonic and fax details of the holder;
- 7.4.5. The e-mail address, if any, of the holder; and
- 7.4.6. The contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).

8. The listed activity, including site preparation, must not commence within **twenty (20)** calendar days from the date the holder notifies the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activity, including site preparation, must not commence until the appeal is decided.

### **Management of activity**

- 9. The Environmental Management Programme ("EMPr") (compiled by WSP Africa Group and dated February 2022) and submitted as part of the application for Environmental Authorisation is herewith approved and must be implemented.
- 10. The EMPr must be included in all contract documentation for all phases of implementation.

### **Monitoring**

- 11. The holder must appoint a suitably experienced environmental control officer ("ECO"), or site agent where appropriate, before the commencement of any development activities to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.
- 12. A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept at the site of the authorised activity during the development activities thereafter it must be kept at the office of the holder and must be made available to any authorised person on request.
- 13. Access to the site referred to in Section C above must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.

### **Auditing**

- 14. In terms of Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr and submit Environmental Audit Reports to the Competent Authority. The Environmental Audit Report must be prepared by an independent person with the relevant environmental auditing expertise and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended).
  - 14.1. The holder must undertake an environmental audit within three (3) months of the commencement of the listed activity and submit an Environmental Audit Report to the Competent Authority one (1) month after the completion of undertaking the environmental audit.

- 14.2. A second Environmental Audit Report must be submitted to the Competent Authority one (1) month after the completion of the development/construction activities.
- 14.3. An Environmental Audit Report must be submitted to the Competent Authority every 5 (five) years after the commencement of the operational phase.
- 14.4. The holder must, within seven (7) days of the submission of the reports to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to any I&APs upon request.

### **Specific Conditions**

15. An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate.
16. Surface, storm or ground water must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.
17. The Odour Management Plan (compiled by WSP Africa Group and dated 28 January 2022) must be implemented during the operational phase.
18. Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.

### **F. GENERAL MATTERS**

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activity.
2. Non-compliance with a condition of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.
3. If the holder does not commence with the listed activity within the period referred to in Condition 2, this Environmental Authorisation shall lapse for that activity, and a new application for Environmental Authorisation must be submitted to the Competent Authority. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be made to the Competent Authority prior to the expiry date of the Environmental Authorisation.
4. An application for amendment of the Environmental Authorisation to the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended) must be submitted.

Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the Competent Authority must only be notified of such changes.

5. The manner and frequency for updating the EMPr is as follows:

Amendments to the EMPr, must be done in accordance with Regulations 35 to 37 of the NEMA EIA Regulations, 2014 (as amended) or any relevant legislation that may be applicable at the time.

## G. APPEALS

Appeals must comply with the provisions contained in the National Appeal Regulations, 2014 (as amended).

1. An appellant (if the holder of the decision) must, within 20 (twenty) calendar days from the date the notification of the decision was sent to the holder by the Competent Authority –
  - 1.1. Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations 2014 (as amended) to the Appeal Administrator; and
  - 1.2. Submit a copy of the appeal to any registered I&APs, any Organ of State with interest in the matter and the decision-maker i.e. the Competent Authority that issued the decision.
2. An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date the holder of the decision sent notification of the decision to the registered I&APs–
  - 2.1. Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations 2014 (as amended) to the Appeal Administrator; and
  - 2.2. Submit a copy of the appeal to the holder of the decision, any registered I&AP, any Organ of State with interest in the matter and the decision-maker i.e. the Competent Authority that issued the decision.
3. The holder of the decision (if not the appellant), the decision-maker that issued the decision, the registered I&AP and the Organ of State must submit their responding statements, if any, to the appeal authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.
4. The appeal form/s must be submitted by means of one of the following methods:

By post:           Attention: Marius Venter  
Western Cape Ministry of Local Government, Environmental Affairs and  
Development Planning  
Private Bag X9186  
**CAPE TOWN**  
8000

By facsimile: (021) 483 4174; or

By hand:           Attention: Mr M. Venter (Tel: 021 483 2659)  
Room 809  
8<sup>th</sup> Floor Utilitas Building  
1 Dorp Street  
**CAPE TOWN**  
8001

By e-mail:        [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za)
5. A prescribed appeal form, as well as assistance regarding the appeal processes is obtainable from the office of the appeal authority at: Tel. (021) 483 3721, E-mail [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za) or URL <http://www.westerncape.gov.za/eadp>.



## H. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this Addendum to the Environmental Authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is appreciated.

Yours faithfully

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**MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

**DATE OF DECISION: 23 MAY 2022**

Copies to: (1) Ms. M. Stewart (City of Cape Town: ERM)  
(2) Mr. J. Grobler (Landowner)  
(3) Ms. J. Fincham (WSP Group Africa (Pty) Ltd.)  
(4) Mr. I. Gildenhuys / Ms. L. Matthys (City of Cape Town)  
  
(5) Mr. P. Harmse (DEA&DP: Air Quality)

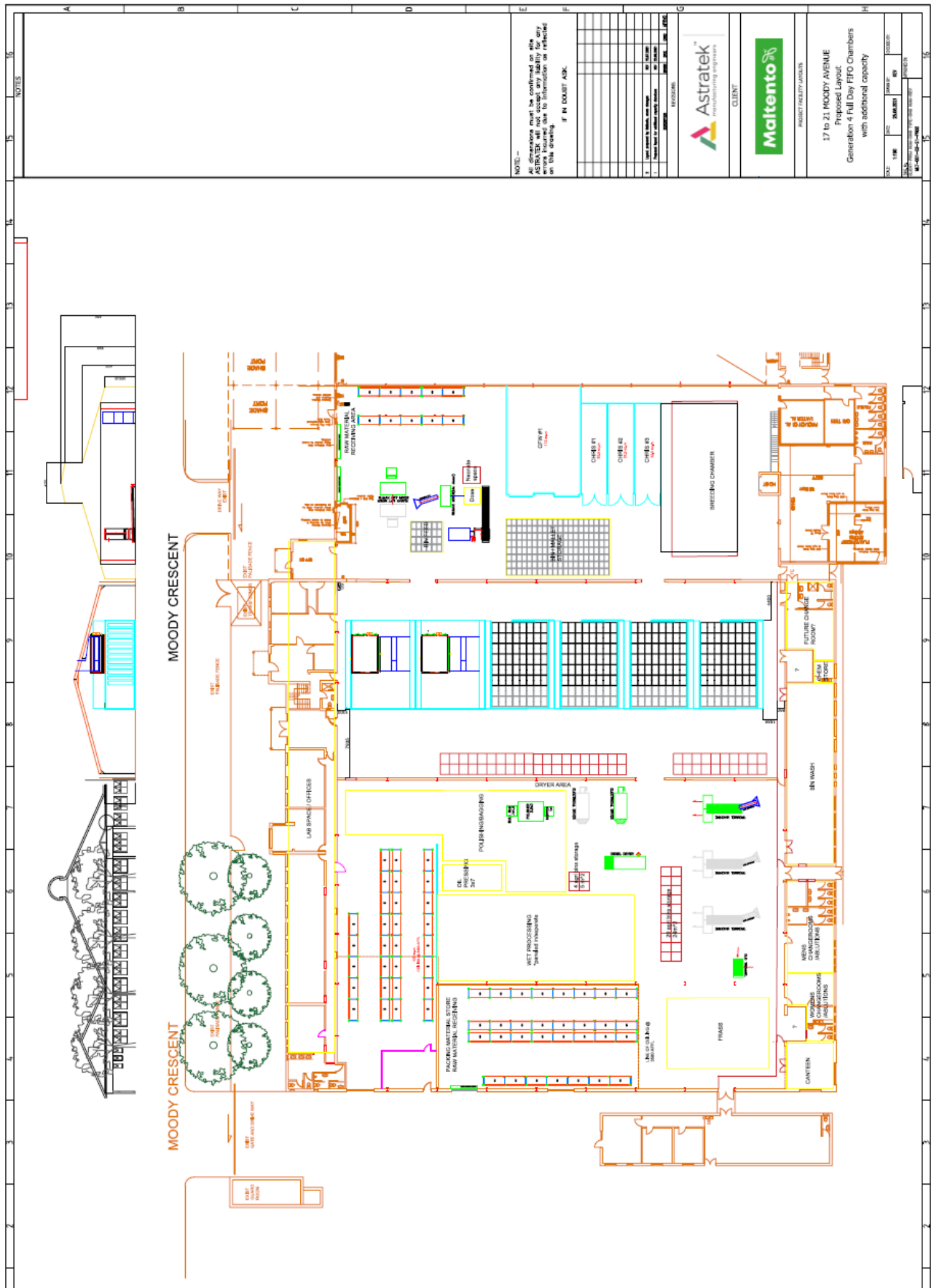
Email: [Maurietta.Stewart@capetown.gov.za](mailto:Maurietta.Stewart@capetown.gov.za)  
Email: [JGrobler@growthpoint.co.za](mailto:JGrobler@growthpoint.co.za)  
Email: [Jacqui.Fincham@wsp.com](mailto:Jacqui.Fincham@wsp.com) / [Robert.Els@wsp.com](mailto:Robert.Els@wsp.com)  
Email: [Ian.Gildenhuys@capetown.gov.za](mailto:Ian.Gildenhuys@capetown.gov.za) /  
[Lynelle.Matthys@capetown.gov.za](mailto:Lynelle.Matthys@capetown.gov.za)  
Email: [Peter.Harmse@westerncape.gov.za](mailto:Peter.Harmse@westerncape.gov.za)

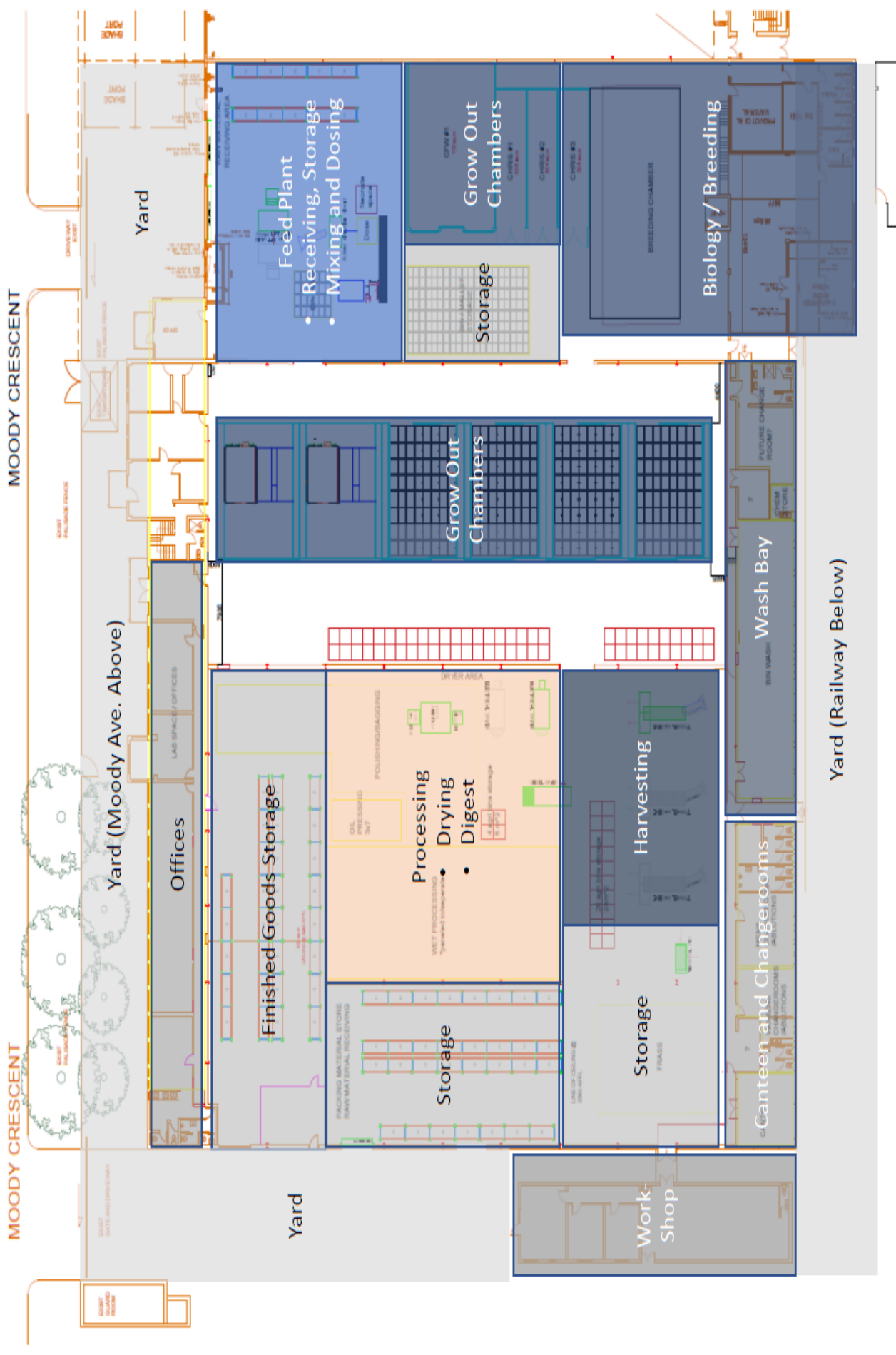
# ANNEXURE 1: LOCALITY PLAN



## ANNEXURE 2: SITE PLAN

Site Development Plans and Schematic flow diagram of production process.





MOODY CRESCENT

MOODY CRESCENT

Yard (Moody Ave. Above)

Yard (Railway Below)

Yard

Yard

Offices

Finished Goods Storage

Storage

Processing  
Drying  
Digest

Storage

Harvesting

Canteen and Changerooms

Work Shop

Grow Out Chambers

Grow Out Chambers

Biology / Breeding

Wash Bay

Feed Plant  
Receiving, Storage  
Mixing and Dosing

Storage

BREEDING CHAMBER

FUTURE CHANGE ROOM STORE

EN WASH

RECEIVING AREA

RECEIVING AREA

RECEIVING AREA

RECEIVING AREA

RECEIVING AREA

### ANNEXURE 3: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority took, inter alia, the following into consideration:

- a) The information contained in the Application Form dated the draft BAR dated 11 November 2021 and received by the Competent Authority on 25 November 2021 and 26 November 2021, respectively, and the BAR dated 26 January 2022 submitted together with the Environmental Management Programme ("EMPr") received by the Competent Authority on 02 February 2022.
- b) Relevant information contained in the Departmental information base, including, the Guidelines on Public Participation, Alternatives and Exemptions (dated March 2013).
- c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998).
- d) The comments received from interested and affected parties and the responses to these, included in the BAR dated 26 January 2022.
- e) The balancing of negative and positive impacts and proposed mitigation measures; and
- f) No site visits were conducted, the Competent Authority had sufficient information before it to make an informed decision without conducting a site visit.

All information presented to the Competent Authority was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues which, according to the competent authority, were the most significant reasons for the decision, is set out below.

#### 1. Public Participation

The public participation process included:

- identification of and engagement with I&APs by means of distributing a background information document (BID) and opportunity to register as an interested and affected party (I&AP);
- fixing of notice boards / site notices at the property boundary where the listed activity is to be undertaken, the OK Minimark in Thornton, the Pinelands Public Library and Langa Police Station on 08 September 2021.
- the placing of newspaper advertisements in the 'City Vision' on 25 November 2021 and the 'Cape Times' on 26 November 2021.
- Making the draft BAR available to I&APs for public review from 26 November 2021 to 17 January 2021.
- giving written notice to the owners and occupiers of land adjacent to the site where the listed activity is to be undertaken, the municipality and ward councilor, and the various organs of state having jurisdiction in respect of any aspect of the listed activity on 26 November 2021 and 12 January 2022.
- Making the draft BAR available to I&APs for public review from 26 November 2021 to 17 January 2022; and
- The PPP undertaken was in accordance with the approved Public Participation Plan (dated 26 August 2021).

Concerns with regards to odour resulting from the proposed activities at the existing facility were raised by adjacent businesses and landowners where a response relating to the odour treating / abatement measures contained in the proposed Odour Management Plan (dated January 2022) and proposed Air Emission Licence application were highlighted. In response to the concerns highlighted by the City of Cape Town's Air Quality Department regarding potential odour producing activities, amendments to the Odour Management Plan have been made.

All the concerns raised by I&APs were responded to and adequately addressed during the public participation process. The Department is satisfied that the Public Participation Process that was followed met the minimum legal requirements and all the comments raised and responses thereto were included in the comments and response report. Specific management and mitigation measures have been considered in this Environmental Authorisation and in the EMP to adequately address concerns raised.

## 2. Alternatives

Site alternatives and technology alternatives were identified and screened out as follows:

An alternative site located at 27 Locksack Avenue; Epping Industria 2 was identified as a potential alternative site as it was large enough (i.e. 6000m<sup>2</sup> in extent) to accommodate the proposed facility with an increased capacity. This site was deemed undesirable based on the following negative aspects:

- The design of the site would not effectively accommodate the proposed layout of the facility.
- The existing traffic congestion experienced within the area.
- Uncertainty surrounding the potential sale of the property.
- Lack of office space.
- A reduced electrical capacity available than the preferred site.
- The sharing of a building with a textile company.

Odour abatement technology screened out (as a result of potential financial costs) included the use of wet scrubbers and ultraviolet germicidal irradiation.

The Preferred Alternative and No-Go" Alternative were as follows:

### The Preferred Alternative - herewith authorised

The Preferred Alternative entails the expansion of the existing Maltento facility and associated infrastructure on Erf 32429, Epping Industria 1.

The existing facility was established in 2019 and makes use of insect technology by means of the dehydration of the black soldier fly larvae (that feed on brewer's by-products (i.e. spent grain, yeast etc.)) to produce nutritional pet and animal functional ingredients (animal feed). The existing facility processes less than 1 (one) tonne of live larvae per day and has therefore not required an Environmental Authorisation prior to the establishment of the existing facility. Products currently produced at the existing facility as follows:

- Primary product (i.e. Dried product – whole dried larvae); and
- Secondary products (i.e. liquid products and live products).

The proposed expansion to the existing facility will occur within the existing building/warehouse. Only the existing facility's operational footprint will expand. No expansion to the existing warehouse outside of the existing development footprint will occur. The existing building will be retro-fitted with infrastructure and divided into four climate-controlled iso-paneled bays as follows:

- Bay 1 – Controlled chambers for feed plant, grow out of larvae and breeding. The chambers will be ducted out to the atmosphere to ensure fresh air in the facility and insect grow rooms.
- Bay 2 – Grow rooms with a wash area for agri-bins, which recycles water for good hygiene purposes.
- Bay 3 – Processing plant, ablution facilities and canteen facility.
- Bay 4 – Product storage and dispatch area.

A maximum total processing capacity of approximately 20 tonnes of live larvae per annum will be established at full capacity. No additional municipal services will be required. Access to the site will be gained off Moody Avenue, Epping.

The production process will be as follows:

Raw materials (in the form of spent grain and yeast, fruit pulp, dry bran, so, maize and broiler pellets) will be delivered to the facility in agri-bins or bulk bags and will be temporarily stored within the facility prior to its use. Raw materials are then mixed and prepared and young larvae are added to each growth bin. Growth bins are then stacked and stored in a climate-controlled chamber. Once the larvae are ready to be harvested, the growth bins are discharged onto a conveyor belt to be separated. A portion of the harvested larvae are allowed to pupate into flies and kept for breeding purposes. The remainder of the harvested larvae are dried and packaged before distribution, minced into a liquid or sold as a live product.

The Preferred Alternative takes cognisance of the existing facility in the context of the surrounding environment in terms of potential receptors, existing traffic, the existing building and cost implications to retro-fit with equipment and existing municipal services. Since the potential impacts associated with the Preferred Alternative is anticipated to be low negative significance post mitigation (with the exception of the potential economic benefits), this alternative is deemed the Preferred.

#### "No-Go" Alternative

The "No-Go" alternative entails the "status quo", i.e. not expanding the existing facility on the Erf 32429, Epping Industria. Since the Preferred Alternative will not result in unacceptable environmental impacts, the demonstration of the application of the Section 2 NEMA principles and the implementation of the mitigation hierarchy, the "No-Go" alternative was not preferred.

### **3. Impact Assessment and Mitigation measures**

#### 3.1 Activity Need and Desirability

The existing facility is within a developed site within an industrial area and the site that has been completely transformed by existing warehouse on Erf 32429, Epping Industria 1. The proposed site is zoned for General Industry purposes and the existing facility is within its existing land-use rights. The existing facility is a sustainable development based on the fact that the process diverts waste from landfill into its process as a primary source and is a promotion of waste recovery / upcycling. The proposed expansion is aligned with the Integrated Development Plan since it will promote economic growth by means of employment opportunities and skills development and contribution to waste minimisation. The proposed expansion of the existing facility is consistent with the principles and policies of the Provincial and Municipal Spatial Development Frameworks.

The proposed expansion of the existing facility will not require any additional municipal infrastructure or services. It is expected that a capital investment in the local economy of approximately R20 -R30 million will be invested as a result of the proposed development. The existing facility currently employs 30 individuals residing in Langa, Gugulethu, Khayelitsha and Westlake. An additional 15 employment opportunities are expected from the proposed expansion.

#### 3.2. Biophysical Impacts

Since the proposed expansion of the existing facility is proposed within an industrial area and within the development footprint of an existing warehouse, the nature of the site is completely transformed with no naturally occurring vegetation and is not located within or within 100m of a delineated watercourse. The proposed expansion is not expected to have any direct agricultural, freshwater, botanical, faunal, heritage, civil aviation, defence impacts. Comments from CapeNature (dated 14 January 2022) and the Western Cape Department of Agriculture (14 January 2022) indicated that they have no objection to the proposed development.

### 3.3. Air Quality Impacts

Although potential air quality impacts are anticipated as a result of the proposed expansion to the existing facility, an Air Quality Impact Assessment was not undertaken as part of this EIA application. An air quality specialist from WSP Environmental (Pty) Ltd indicated (in their correspondence dated 26 October 2021) that no measurements / data was available for the existing facility since it was not required to record emissions associated with the existing facility. In addition, no documented / validated emission factors are available as a point of reference with regards to the existing facility. The air quality specialist recommended that odour dispersion modelling / assessment be conducted once the proposed expanded facility is in operation and is based on emission data requirements. The air quality specialist further suggested that a Tier 1 atmospheric dispersion model be undertaken to depict the extreme impact scenario at community receptor level. The City of Cape Town: Air Quality Management Unit indicated (in their correspondence dated 22 January 2022) that they support the recommendations of the specialist.

An Odour Management Plan (compiled by WSP Africa Group and dated 28 January 2022) was compiled in accordance with international best practice (for control, monitoring and measurement of odorous components associated with the proposed expanded facility). Abatement measures proposed should confirm that odour impacts will occur below nuisance thresholds during normal operating conditions. It is proposed that the implementation of the mitigation measures contained in the Odour Management Plan would minimise odour impacts as an interim measure until accurate emission measurements and modelling assessments can be conducted to confirm the level of impact.

### 3.4. Noise Impacts

According to the Screening Report (dated 13 August 2021), the proposed activity is deemed to have sensitivities from an acoustic / auditory perspective and has identified that a Noise Impact Assessment is required. The EAP has disputed this requirement and deemed it unnecessary based on the fact that the proposed expansion of the existing facility is contained within an existing warehouse and significant noise impacts within the industrial area are not expected.

Potential noise impacts associated with the proposed development will be mitigated by the implementation of the mitigation measures included in the EMPr.

### 3.5. Traffic Impacts

According to the Screening Report (dated 13 August 2021), the proposed activity is deemed to have sensitivities from a traffic perspective and has identified that a Traffic Impact Assessment is required. The EAP has disputed this requirement and deemed it unnecessary based on the fact that the proposed expansion will not result in significant traffic impact associated with the delivery of raw materials and the loading of products.

### 3.6. Services

No additional municipal services will be required as a result of the proposed expansion.

The development will result in both negative and positive impacts.

Negative Impacts include:

- Potential reduction in air quality / odour / nuisance; and
- Potential increase in noise impacts during the construction phase.

Positive impacts include:

- Diversion of waste to landfill and upcycling of waste / waste recovery;



- The production of high protein based products;
- Employment opportunities during construction and operation phase of the proposed development; and
- Economic gain for the applicant.

### **National Environmental Management Act Principles**

The National Environmental Management Principles (set out in section 2 of the NEMA, which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), inter alia, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures; and
- the selection of the best practicable environmental option.

### **Conclusion**

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, the Competent Authority is satisfied that the proposed listed activity will not conflict with the general objectives of integrated environmental management stipulated in Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and that any potentially detrimental environmental impacts resulting from the listed activity can be mitigated to acceptable levels.

You are reminded of your general duty of care towards the environment in terms of Section 28(1) of the NEMA which states: *“Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”*

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