



**REFERENCE:** 16/3/3/1/D5/15/0001/19  
**ENQUIRIES:** Shireen Pullen  
**DATE OF ISSUE:** 08 OCT 2019

The Director  
Hessequa Abattoir (Pty) Ltd  
PO Box 287  
**RIVERSDALE**  
6670

**Attention:** Mr. A. Swartz

Tel: 082 443 1740  
Fax: 086 627 6774

Dear Sir

**APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED): PROPOSED HESSEQUA ABATTOIR EXPANSION ON ERF 5798 AND THE PLACEMENT OF A CONTAINER TO HOUSE A MICRO RENDERING FACILITY ON ERF 4481, RIVERSDALE**

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 Environmental Authorisation, that all registered interested and affected parties ("I&APs") are provided with access to 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 Appeal Regulations, 2014, which prescribes the appeal procedure to be followed. This procedure is summarized in the attached Environmental Authorisation.

Yours faithfully

**MR. GAVIN BENJAMIN**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 3)**

Copy

Ms M. McKay  
Mr. S. Carelse

Cape EAPrac (EAP)  
Hessequa Municipality

Fax: 044 874 0432  
Email: shagon@hessequa.gov.za



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

**ENVIRONMENTAL AUTHORISATION**

**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 Department herewith **grants Environmental Authorisation** to the applicant to undertake the listed activities specified in section B below with respect to the preferred alternative, described in the Basic Assessment Report ("BAR"), dated 20 June 2019.

The granting of this Environmental Authorisation is subject to compliance with the conditions set out in section E below.

**A. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION**

The Director  
Hessequa Abattoir (Pty) Ltd  
% Mr. A. Swartz  
PO Box 287  
**RIVERSDALE**

6670

Tel: 082 443 1740  
Fax: 086 627 6774

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

## B. LIST OF ACTIVITIES AUTHORISED

The applicant is herein authorised to undertake the following alternative that includes the listed activities:

The proposal entails the undertaking of the listed activities below, in order to increase the throughput capacity of an existing abattoir from a 70 LSU /770 sheep abattoir to a 200 LSU / 1200 sheep abattoir. No structural changes are proposed or required for this expansion.

The proposal also includes the establishment of a micro rendering facility with a daily capacity of 4000kg on erf 4481, which will produce bone meal and tallow from the organic raw material.

Government Notice No. R. 983 of 4 December 2014 (as amended) –

Listed Activities	Activity/Project Description
<p>Government Notice No. R. 327 of 7 April 2017</p> <p><i>Activity 34</i> <i>Activity Description</i> The expansion or changes to existing facilities for any process or activity where such expansion or changes 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 or pollution, excluding—</p> <p>(i) where the facility, 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; or</p> <p>(ii) the expansion of or changes to existing facilities for the treatment of effluent, wastewater or sewage where the capacity will be increased by less than 15 000 cubic metres per day.</p>	<p>The proposal includes the addition of a micro rendering facility to treat the organic abattoir waste to produce blood meal, protein meal and tallow. The micro rendering facility will have a design capacity exceeding 1000kgs and as such will require an Atmospheric Emissions License (AEL) in terms of the NEM: AQA.</p>
<p><i>Activity 38</i> <i>Activity Description</i> The expansion and related operation of facilities for the slaughter of animals where the daily product throughput will be increased by more than—</p> <p>(i) 50 poultry;</p>	<p>The abattoir is currently authorised to slaughter 70 large stock units (LSU) or 700 sheep / goats (70/700 slaughter units) in terms of NEMA, however they</p>

<p>(ii) <b>6 units of reptiles, red meat and game; or</b>  (iii) 20 000 kg wet weight per annum of fish, crustaceans and amphibians.</p>	<p>have a 2018 throughput certificate from DAFF to accommodate 50/550 slaughter units. The management expansion activities will mean that they have the capacity to slaughter 200 LSU or 1200 sheep / goats (200/1200 slaughter units). Thus the expansion is more than 6 red meat units.</p>
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Hereinafter referred to as “listed activities”.

**C. SITE DESCRIPTION AND LOCATION**

The listed activities will take place at 35 Mulder Street on erven 4481 & 5798, within the existing industrial area of Riversdale.

SG 21 Code:

Abattoir: C06400030000579800000

MRF: C06400030000448100000

The listed activities will be undertaken at the following co-ordinates:

Coordinates:

Abattoir: 34° 05' 37" South  
21° 14' 51" East

MRF: 34° 05' 36.9" South  
21° 14.49' 10" East

The above is hereinafter referred to as “the site”.

**D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER**

Environmental Assessment Practitioner:  
Cape Environmental Assessment Practitioners (Pty) Ltd  
% Ms Melissa Mackay  
PO Box 2070  
**GEORGE**  
6530

Tel: 044 874 0365  
Fax: 044 874 0432

## E. CONDITIONS OF AUTHORISATION

### Scope of authorisation

1. The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the following preferred Alternative B as described in Section B above:

The proposal entails the expansion of the throughput capacity of an existing high throughput abattoir from a 70 LSU /770 sheep abattoir to a 200 LSU / 1200 sheep abattoir. No structural changes are proposed or required for this expansion, however, the proposal does include the addition of a micro-rendering facility on an erf 4481 across the road from the existing abattoir.

2. The non-operational component of the Environmental Authorisation is subject to the following:
  - 2.1 The holder must commence with all the listed activities within a period of **five (5) years** from the date of issue of this Environmental Authorisation;
  - 2.2 The development activities (construction phase) must be concluded within a period of **seven (7) years** from the date of issue of this Environmental Authorisation; and
  - 2.3 The post construction and monitoring requirements must be finalised within a period of six (6) months from the date the development activities (construction phase) are concluded.
3. The operational aspects of this Environmental Authorisation are granted for a period until **07 October 2049** during which period all monitoring requirements and final environmental auditing and reporting must be finalised. The abattoir and micro rendering facility may not be operated without a valid Environmental Authorisation.
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 Department

6. Seven calendar days' notice, in writing, must be given to the Department before commencement of construction activities.
  - 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 8, 10

### **Notification of authorisation and right to appeal**

7. The applicant must in writing, within 14 (fourteen) calendar days of the date of this decision–
- 7.1 notify all registered Interested and Affected Parties ("I&APs") of –
- 6.1.1 the outcome of the application;
  - 6.1.2 the reasons for the decision as included in Annexure 2;
  - 6.1.3 the date of the decision; and
  - 6.1.4 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 National Appeals Regulations, 2014 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;
- 7.4 provide the registered I&APs with:
- 7.4.1 the name of the holder (entity) of this Environmental Authorisation;
  - 7.4.2 name of the responsible person for this Environmental Authorisation;
  - 7.4.3 postal address of the holder;
  - 7.4.4 telephonic and fax details of the holder;
  - 7.4.5 e-mail address, if any, of the holder;
  - 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 2014 National Appeals Regulations.

### **Management of activity**

8. The draft EMPr submitted as part of the application for Environmental Authorisation must be amended:
- 8.1 to include an integrated air quality monitoring system, which specifies the frequency and parameters of monitoring, as well as the responsible person that will conduct monitoring of emissions. This system should take into consideration the requirements of the AEL and give effect to the provisions/measures stipulated therein.
- 8.2 and approved by this Department, prior to commencement of construction activities.

An application for amendment to the EMPr must be submitted to the Department if any further amendments to the EMPr are proposed, other than those mentioned above, and this may only be implemented once the amended EMP has been authorised by the Department.

The EMPr must be included in all contract documentation for all phases of implementation.

9. The facility (abattoir and micro rendering facility) must be operated nuisance-free in terms of emissions and controls. Non-compliance with these requirements may result in the suspension of this environmental authorisation and subsequent operational activities of the abattoir.

### **Monitoring**

10. The holder must appoint a suitably experienced environmental control officer ("ECO") for the Construction Phase to monitor compliance with the provisions of the EMPr and conditions of the EA and to ensure the effective decommissioning of the construction phase. Such appointment must take place prior to commencement of construction activities to ensure compliance with the EMPr and the conditions contained herein.
11. A copy of the Environmental Authorisation, EMPr, audit reports and compliance monitoring reports must be kept at the site of the authorised activities, and must be made available to anyone on request.
12. Access to the site referred to in section C must be granted and the environmental reports mentioned above must be produced to any authorised official representing the Department who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.

### **Environmental Audit Reports**

13. The holder must, for the period during which the environmental authorisation and EMPr remain valid ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.
14. The environmental audit report must be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise.
15. The holder must, within 7 days of the submission of the environmental audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).
16. The Environmental Audit Report must contain all the information required in Appendix 7 of the Environmental Impact Assessment Regulations, 2014.
17. During the construction phase, the holder must undertake annual environmental audit(s) and submit these Environmental Audit Report(s) to the Competent Authority.
18. The final construction phase Environmental Audit Report(s) must be submitted to the Competent Authority within six (6) months of completion of construction;

19. During the operation phase, the holder must ensure that environmental audit(s) are performed as specified in the approved EMPr and submit these Environmental Audit Report(s) to the Competent Authority.

### **Specific Conditions**

20. No surface or groundwater may be polluted as a consequence of any actions on the site. The applicable requirements of the relevant legislation must be met.
21. The existing agreement with the Hessequa Municipality regarding effluent or wash water that will go to the sewage works via the existing sewage connections must be adhered to and kept in place for as long as the abattoir is functional.
22. Contaminated stormwater should be collected in large ponds, aerated and irrigated without any off-site runoff.
23. Clean stormwater must be directed to the stormwater drainage system and may be used for watering and washing down in the facility.
24. The connection pipe of the stormwater and wastewater must be disconnected from the sewer connection and no contaminated stormwater may enter the sewer.
25. Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or unmarked human burials.

A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains.

### **F. GENERAL**

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.

#### ***Amendment of Environmental Authorisation and EMPr***

2. If the holder does not commence with a listed activity within the period referred to in Section D, this Environmental Authorisation shall lapse for that activity, and a new application for Environmental Authorisation must be submitted to the relevant Competent Authority.

If the holder wishes to extend a validity period specified in the Environmental Authorisation, an application for amendment in this regard must be made to the relevant Competent Authority prior to the expiry date of such a period.



Note:

- (a) Failure to lodge an application for amendment prior to the expiry of the validity period of the Environmental Authorisation will result in the lapsing of the Environmental Authorisation.
  - (b) It is an offence in terms of Section 49A(1)(a) of NEMA for a person to commence with a listed activity if the competent authority has not granted an Environmental Authorisation for the undertaking of the activity.
3. The holder is required to submit 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.

In assessing whether to grant such 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.

The onus is on the holder to verify whether such changes to the environmental authorisation must be approved in writing by the relevant competent authority prior to the implementation thereof.

4. The period within which commencement of the listed activities must occur, may not be extended unless the required process to amend the environmental authorisation as contemplated in the Environmental Impact Assessment Regulations, 2014 (or subsequent notice) is followed.
5. The manner and frequency for updating the EMPr is as follows:
- (a) Any further amendments to the EMPr, other than those mentioned above, must be approved in writing by the relevant competent authority.
  - (b) An application for amendment to the EMPr must be submitted to the Competent Authority if any amendments are to be made to the impact management outcomes of the EMPr. Such amendment(s) may only be implemented once the amended EMP has been approved by the competent authority.

The onus is however on the holder to confirm the legislative process requirements for the above scenarios at that time.

6. Where an amendment to the impact management outcomes of an EMPr is required before an environmental audit is required in terms of the environmental authorisation, an EMPr may be amended on application by the holder of the environmental authorisation.

### ***Compliance with Environmental Authorisation and EMPr***

7. Non-compliance with a condition of this environmental authorisation or EMPr is an offence in terms of Section 49A(1)(c) of the National Environmental Management Act, 1998 (Act no. 107 of 1998, as amended).
8. In the event that the Environmental Authorisation should lapse, it is an offence in terms of Section 49A(1)(a) of NEMA for a person to commence with a listed activity, unless the

competent authority has granted an Environmental Authorisation for the undertaking of the activity.

9. Offences in terms of the NEMA and the Environmental Impact Assessment Regulations, 2014, will render the offender liable for criminal prosecution.

### ***Suspension and withdrawal of environmental authorisation***

10. In terms of Regulation 38(1) of the NEMA EIA Regulations, the competent authority may, in writing, suspend or partially suspend, with immediate effect, the environmental authorisation and direct the holder of such environmental authorisation forthwith to cease any activities that have been commenced or to refrain from commencing any activities, pending a decision to withdraw the environmental authorisation, if the competent authority has reason to believe that the authorisation was obtained through fraud, non-disclosure of material information or misrepresentation of a material fact.

## **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 and the responding statement must be submitted to the address listed below:

By post: 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 Marius Venter (Tel: 021 483 3721)  
Room 809  
8<sup>th</sup> Floor Utilitas Building, 1 Dorp Street, Cape Town, 8001

**Note:** For purposes of electronic database management, you are also requested to submit electronic copies (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Authority to the address listed above and/ or via e-mail to [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 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 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



**MR. GAVIN BENJAMIN**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 3)**

DATE OF DECISION: 07/10/2019

Ms M. MacKay  
Mr. S. Carelse

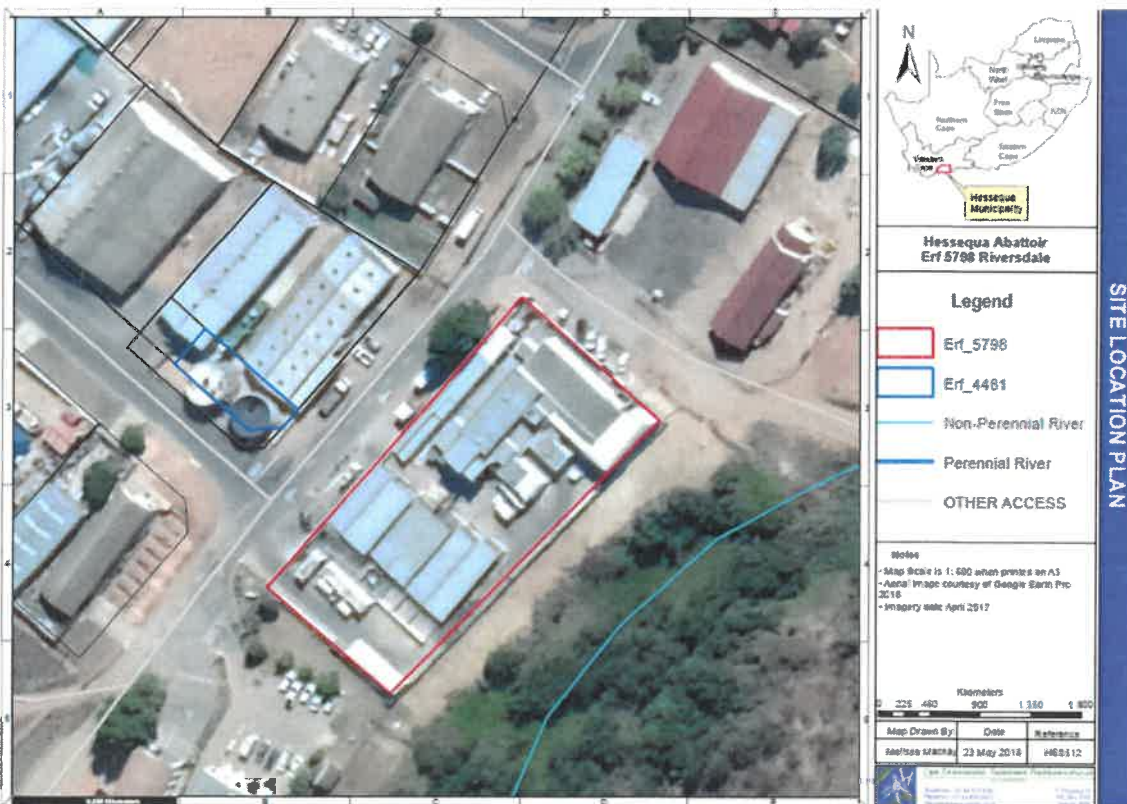
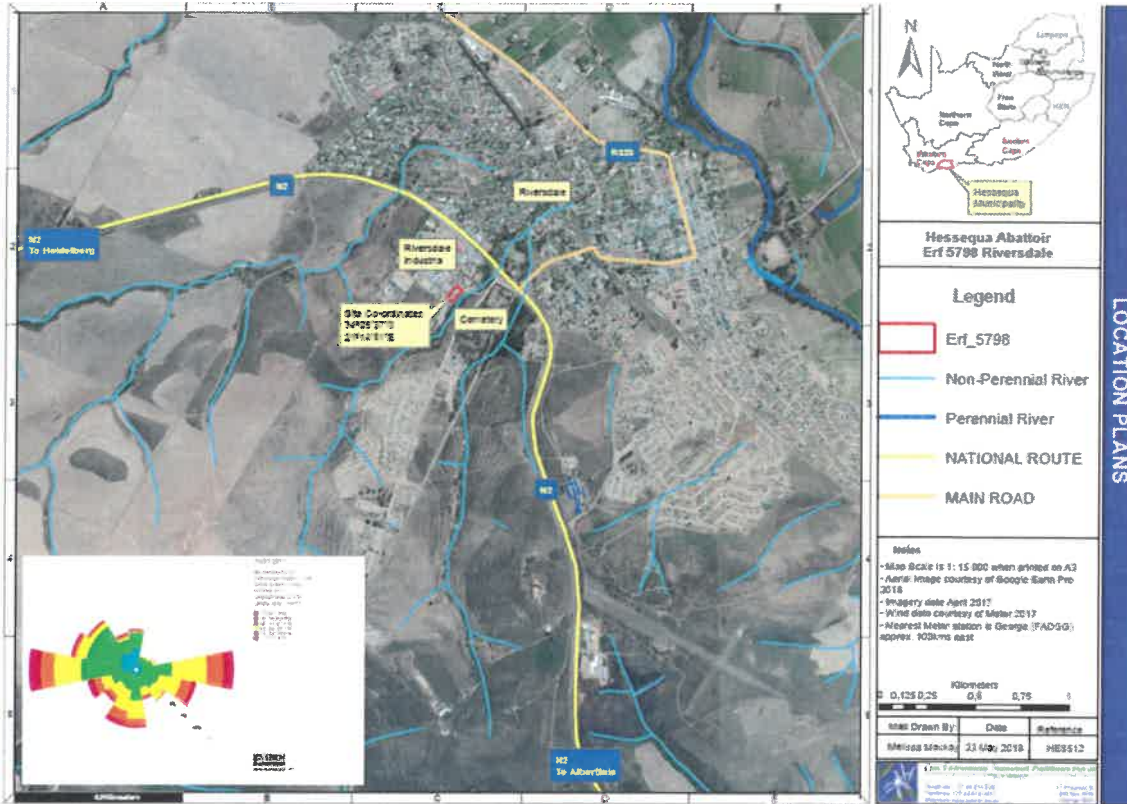
Cape EAPrac (EAP)  
Hessequa municipality

Fax: 044 874 0432  
Email: [shagon@gessequa.gov.za](mailto:shagon@gessequa.gov.za)

### **FOR OFFICIAL USE ONLY:**

**EIA REFERENCE NUMBER:** 16/3/3/1/D5/15/0001/19  
**NEAS EIA REFERENCE NUMBER:** WCP/EIA/ 0000557/2019

**ANNEXURE 1: LOCALITY MAP**





### **ANNEXURE 3: REASONS FOR THE DECISION**

In reaching its decision, the Department, *inter alia*, considered the following:

- a) The information contained in the Application Form dated 28 January 2019, the final BAR and the EMPr submitted together with the final BAR dated 19 June 2019;
- b) Relevant information contained in the Departmental information base, including, the Guidelines on Public Participation, Alternatives (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 I&APs and responses to these, included in the final BAR dated 19 June 2019;
- e) The balancing of negative and positive impacts and proposed mitigation measures; and
- f) A site visit was conducted on 17 September 2019 attended by Shireen Pullen and Harriet van Schalkwyk from this Department and Eddie Ten Hoope (Facility Manager).

All information presented to the Department was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues that were considered to be the most significant for the decision is set out below.

#### **1. Public Participation**

The public participation process included:

- identification of Interested and Affected Parties (I&APs) and engagement with I&APs;
- fixing a notice board on 4 June 2018 at the site and any alternative site where the listed activities are to be undertaken;
- giving written notice on 6 June 2018 to the owners and occupiers of land adjacent to the site and any alternative site where the listed activities are to be undertaken, the municipality and ward councillor, and the various organs of state having jurisdiction in respect of any aspect of the listed activities;
- the placing of a newspaper advertisement in the 'South Cape Forum' on 26 July 2018;
- First 30-day Public & Authority Consultation period (20 Feb- 22 March 2019);
- Second 30-day Public & Authority Consultation period (16 May - 14 June 2019);

During the first PPP period the Department of Health, Breede Gouritz Catchment Management Agency (BGCMA) and Hessequa Municipality raised concerns regarding the provision of sufficient water supply, drainage capacity, surface water pollution, waste disposal, traffic impact, stormwater management, the provision of a water demand management plan, complaints about odours, as well as the quality of the wastewater from the expanded abattoir.

All the concerns raised by I&APs during the public participation process were responded to and adequately addressed by the EAP in the final BAR. Specific management and mitigation measures have been incorporated into this Environmental Authorisation and in the EMPr to adequately address the concerns raised.

The Garden Route District Municipality, which is the licensing authority for the micro-rendering facility indicated their support as the proposed MRF is based on the best available technology. They further indicated that the BAT efficacy is dependent on various design and operational factors and that the holder is still responsible to mitigate plant odours and to prevent offensive odours.

The Department concurs with the Environmental Assessment Practitioner's responses to the issues raised during the public participation process and has included appropriate conditions in this Environmental Authorisation to ensure that the identified impacts that will have a negative effect on the receiving environment are avoided, mitigated or minimised where necessary.

## **2. Alternatives**

No property and location sites were considered, as the application is for the expansion of the throughput capacity of the existing facility.

### **Preferred Alternative**

This alternative entails the expansion of an existing abattoir that has been in existence for more than 32 years by increasing the throughput capacity from 70 LSU / 770 sheep to 200 LSU / 1200 sheep. It also entails the addition of a micro-rendering facility to be located in a container adjacent to the current biogas tanks on Erf 4481 across the road from the abattoir. This micro-rendering facility will enable the abattoir to manage its' waste product on site instead of transporting the organic by-products offsite as per status quo. The onsite treatment will mean that the organic materials are processed to produce a viable, in demand product such as bone, blood, protein meal and tallow.

The implementation of the micro rendering facility will greatly improve the organic waste management of the facility and add another production stream from material previously discarded.

### **Alternative 2**

This alternative entails the expansion of an existing abattoir that has been in existence for more than 32 years by increasing the throughput capacity from 70 LSU / 770 sheep to 200 LSU / 1200 sheep, without the implementation of the micro rendering facility. This means the waste management of the facility remains as is, daily transport of organic material to offsite facilities. This is not the applicant's preferred alternative.

### **No-Go Alternative**

This alternative entails retaining the current throughput capacity of 70 LSU / 770 sheep and the existing waste management process of removing organic material daily to offsite facilities.

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

### *3.1 Activity Need and Desirability*

The BAR submits that the properties are zoned Industrial 1 and Erf 5798 currently operates as an abattoir with a throughput capacity of 50/550, although it is authorised for 70/700. According to the BAR the expansion activity will not compromise the objectives of any forward planning documents. The municipality has already indicated that the

expansion of activities in the industrial area supports employment opportunities and improves economic development in the town, which is a priority.

The BAR submits that Hessequa Abattoir is the only high throughput abattoir in the Hessequa Municipal area. The nearest high throughput abattoirs to the Hessequa municipal area are located in Bredasdorp (120kms west) or Mossel Bay (112kms east). This places the Hessequa Abattoir strategically in the middle of an area that has a high production of sheep. This also means that transport of livestock to slaughter facilities is reduced and subsequently the conditions of the animals are improved where transport distances are shorter. According to the BAR it will also ensure that a better product is available to consumers and that farmers get better prices for their livestock and the economic development and recognition of the region for good quality meat products is ensured.

### 3.2 *Services/ bulk infrastructure*

According to the BAR these services will be provided by the Hessequa Municipality, as confirmed in their correspondence dated 14 June 2019. The water demand management plan submitted with the final BAR further articulates the estimated water demands and estimated volumes of wastewater that will be produced and how these will be managed.

### 3.3 *Biodiversity and biophysical impact*

The existing abattoir, as well as the erf for the micro rendering facility are both located within the Riversdale industrial area, on a site that is already transformed and developed. As such, there will be no impact on any biodiversity elements as a result of the proposed upgrade of the abattoir facility.

### 3.4 *Traffic*

The BAR submits that both erven have existing access off municipal roads. According to the BAR any potential traffic impacts could include livestock deliveries taking place more frequently than the current status quo, although this is not expected to lead to significant impacts on other road users. According to the traffic impact statement, the traffic impact of the proposed upgrade will be insignificant and therefore no changes to the existing road infrastructure are required.

### 3.5 *Socio-economic*

According to the BAR, the expansion will result in more opportunities for local farmers to slaughter and sell their livestock. According to the BAR one can also expect increased production of livestock due to the locality of the abattoir facility, which will ensure better products for consumers.

### 3.6 *Air Quality*

The BAR submits that no official emission limits have been defined for animal matter processing in National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004) "NEMAQA". According to the BAR the only requirement is best practice measures intended to minimise or avoid odours that must be implemented by all installations. These measures must be documented to the satisfaction of the Licensing Authority.

According to the BAR it is generally accepted that odorous emissions, while not necessarily hazardous, are a cause for complaints from nearby receptors.

The Air Quality Specialist Report states that Best Available Technology (BAT) is the thermal treatment of emissions and further states what can be done if offensive residual



emissions are emitted. The USEPA AP-42, CH 9.5.3: Meat Rendering Plants, lists emissions and controls (BAT) for odour emission abatement. It is recommended that one of these USEPA odour emission abatement methods be considered, including the treatment of all fugitive emissions to comply or give effect to Condition 9 of this environmental authorisation, which specifically aims to address this aspect of emissions and controls for odour emission abatement.

Furthermore, this Department, in its consideration of the proposal took inter alia into account that any BAT's efficacy is dependent on various design and operational factors. Although this technology is deemed as BAT by the USEPA, the holder is still responsible to mitigate all plant emissions in order to prevent any offensive odours and to comply with the minimum emission limits that will be specified in the Atmospheric Emission Licence.

Support for the proposed micro-rendering facility is based on the findings of the Air Quality Specialist Report, which clearly indicated negligible offensive odour emitted from the proposed rendering plant.

### 3.7 Surface Water

According to the BAR, Erf 5798 is located adjacent to a non-perennial drainage line, which arises from the southwest and ends in the town of Riversdale. However, it must be noted that this is not a new abattoir and the current abattoir has been in operation for over 30 years, preceding the enactment of the NWA. Furthermore, there is an existing municipal water line that is located to the east of the erf boundary alongside the watercourse. This servitude is maintained by the municipality. With this in mind, this Department is of the opinion that with the implementation of the EMP and mitigation measures, the expansion of the abattoir will not result in any adverse effects on the riparian ecological status of the water resource.

## 4. Impacts

According to the BAR the proposed activity will result in both positive and negative impacts; namely:

- The preferred alternative has the potential to generate +/- 6 full time employment opportunities.
- The implementation of the micro rendering facility will greatly improve the organic waste management of the facility and add another production stream from material previously discarded.
- The preferred alternative will stimulate the economy to a greater extent compared to the No-Go alternative.
- The preferred alternative can be provided for in terms of service capacity and supply by the Hessequa Municipality.
- Potential noise and odour impacts may occur with both alternatives although the higher throughput volume (the preferred alternative) may have slightly elevated levels / volumes when compared to the No Go option. It has been confirmed however that the odour concentrations area is already below ambient levels and will have a very low to negligible impact on surrounding areas in the vicinity.

*Considering both positive and negative impacts mentioned above, as well as the mitigation measures contained in the EMP, the positive impacts largely outweigh the negative impacts, as these are mostly insignificant in nature.*

## 5. 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.

## 6. Conclusion

**In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, this Department is satisfied that the proposed listed activities 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 activities can be mitigated to acceptable levels.**

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