



REFERENCE: 16/3/3/1/D2/21/0003/18
NEAS REFERENCE: WCP/EIA/0000395/2018
ENQUIRIES: Ms. Jessica Christie
DATE OF ISSUE: 2018 -08- 17

ENVIRONMENTAL AUTHORISATION

APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014: PROPOSED "RAND STREET ABATTOIR" ON ERF 8564, RAND STREET, GEORGE

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, the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the listed activities specified in section B below with respect to Alternative 1, described in the Basic Assessment Report ("BAR"), dated 14 May 2018.

The applicant for this Environmental Authorisation is required to comply with the conditions set out in section E below.

A. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

The Director
K2017009925 (SOUTH AFRICA) (PTY) LTD.
% Mr Jan van Rensburg
PO Box 288
GEORGE
6530

Tel: (044) 802 0000
Fax: (044) 874 7199

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

B. LIST OF ACTIVITIES AUTHORISED

Listed Activities	Activity/Project Description
Government Notice No. R. 983 of 4 December 2014 – Activity Number: 3 Activity Description: <i>The development and related operation of facilities or infrastructure for the slaughter of animals with a—</i> <i>(i) product throughput of poultry exceeding 50 poultry per day;</i> <i>(ii) <u>product throughput of reptiles, game and red meat exceeding 6 units per day; or</u></i> <i>(iii) wet weight product throughput of fish, crustaceans or amphibians exceeding 20 000 kg per annum</i>	The proposal is to develop and operate an abattoir on Erf 8564, George with a throughput capacity to slaughter 100 red meat units per day. Lairages will be developed to hold a maximum number of animals equivalent to 100 red meat units as well as staff amenities, offices and parking will be added.

The abovementioned list is hereinafter referred to as "**the listed activity**".

The holder is herein authorised to undertake the following alternative that includes the listed activity as it relates to the development:

The development and operation of an abattoir on Erf 8564 with a throughput capacity to slaughter 100 red meat units per day, including the development of associated lairages to hold a maximum number of animals equivalent to 100 units, additional ablution, parking and office facilities. The abattoir itself will be housed within the existing main building whilst the ancillary components (i.e. holding-pens/lairages, parking, offices.) will be newly constructed.

C. SITE DESCRIPTION AND LOCATION

The listed activity will be undertaken on Erf 8564, George with the physical address being 40 Rand Street George. The property is located at the following co-ordinates at the centre of the site:

Latitude: 33° 58' 59.42" South;

Longitude: 22° 27' 34.20" East

The SG digit code is: C02700020000856400000

Refer to Annexure 1: Locality Plan and Annexure 2: Site Development Plan.

The above is hereinafter referred to as "**the site**".

D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER / AND REVIEWER

Environmental Assessment Practitioner:

CAPE ENVIRONMENTAL ASSESSMENT PRACTITIONERS (PTY) LTD.
% Mrs. Melissa Mackay / Mrs. Louise-Mari van Zyl
P. O. Box 2070
GEORGE
6530

Tel: (044) 874 0365

Fax: (044) 874 0432

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Website: www.cape-eaprac.co.za

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 Alternative 1 described in the BAR dated 14 May 2018 on the site as described in Section C above.

This Environmental Authorisation is only for the implementation of the Preferred Alternative for the site which entails:

The development and operation of an abattoir on Erf 8564 with a throughput capacity to slaughter 100 red meat units per day, including the development of associated lairages to hold a maximum number of animals equivalent to 100 units, additional ablution, parking and office facilities. The abattoir itself will be housed within the existing main building whilst the ancillary components (i.e. holding-pens/lairages, parking, offices.) will be newly constructed.

Where "unit" in relation to a quantity standard for determining throughput of facilities or infrastructure for the slaughter of animals, has the meaning assigned to it in Regulations promulgated in terms of the Meat Safety Act, 2000 (Act No. 40 of 2000) in this case the Red Meat Regulations, 2004 (Government Notice no. 1072 of 17 September 2004) apply. Furthermore, "red meat" refers to domesticated units limited to cattle (i.e. cows, oxen, bulls or calves); horses; sheep, goats and pigs.

The facility will be established in accordance with the site development plan depicted in Annexure 2 of this Environmental Authorisation.

2. The non-operational component of the Environmental Authorisation is subject to the following:
 - 2.1 The holder must commence with the listed activity and conclude the development activity (construction phase) by **31 August 2023**. The facility must be completed to be able to operate at the full throughput capacity by said date; and
 - 2.2 The holder must finalise the post construction rehabilitation and monitoring requirements within a period of 12-months from the date the development activity (construction phase) is concluded.
3. The operational aspects of this Environmental Authorisation are granted until **31 August 2038** and during which period all rehabilitation and monitoring requirements and final environmental auditing and reporting must be finalised.
4. The listed activity may only be implemented in accordance with an approved Environmental Management Programme ("EMPr").
5. 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.

6. 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.

Notification and administration of appeal

7. The holder 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 –
 - 7.1.1. the decision reached on the application;
 - 7.1.2. the reasons for the decision as included in Annexure 3;
 - 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 G 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 the:
 - 7.4.1. 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. 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 (as amended).
 - 7.5. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision.
 - 7.6. 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 activities, including site preparation, must not commence until the appeal is decided.

Written notices to the Competent Authority

8. Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities.
 - 8.1. The notice must make clear reference to the site details and EIA Reference number given above.

8.2. The notice must also include proof of compliance with the following conditions described herein: **Condition no.: 7, 9, 10 and 12**

Management of activity

9. The draft or Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation must be amended to address the following aspects. The amended EMPr must -
 - 9.1. incorporate all the conditions given in this Environmental Authorisation;
 - 9.2. include the detailed final designs of the facility;
 - 9.3. incorporate an environmental auditing and monitoring schedule detailing the frequency of auditing compliance with environmental authorisation and environmental management programme and submission of environmental audit reports to the Competent Authority **during the construction and operational phases;**
10. The amended EMPr must be re-submitted to the Competent Authority and approved prior to commencement of construction.
11. The EMPr must be included in all contract documentation for all phases of implementation.

Monitoring

12. The holder must appoint a suitably experienced environmental control officer ("ECO") or Environmental Site Agent ("ESA"), for the duration of the construction phase of implementation contained herein.
13. The ECO or ESA must—
 - 13.1. be appointed prior to commencement of any construction activities commencing;
 - 13.2. ensure compliance with the EMPr and the conditions contained herein;
 - 13.3. keep record of all activities on site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO or ESA;
 - 13.4. remain employed until all development activities are concluded and the post construction and monitoring requirements are finalised.
14. A copy of the Environmental Authorisation, EMPr, any independent assessments of financial provision for rehabilitation and environmental liability, closure plans, audit reports and compliance monitoring reports must be kept at the site of the authorised activities and be made available to anyone on request, and where the holder has website, such documents must be made available on such publicly accessible website.
15. 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 Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.

Auditing

16. The holder must, for the period during which the environmental authorisation and EMPr remain valid—

- 16.1. ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited;
- 16.2. during the construction phase, the holder must undertake annual environmental audit(s) and submit these Environmental Audit Report(s) to the Competent Authority.

The final construction phase Environmental Audit Report(s) must be submitted to the Competent Authority within **two (2)** months of completion of construction;

- 16.3. during the operation phase, the holder must ensure that environmental audit(s) are performed regularly and submit these Environmental Audit Report(s) to the Competent Authority.

During the operational phase the frequency of the auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr must be done **annually for the first 5 years and thereafter may not exceed intervals of 5 years.**

A final audit must be performed prior to the validity period of the operational aspects lapsing as specified in this Environmental Authorisation. The final environmental audit must specifically determine and recommend if the operational validity period must be extended;

- 16.4. the environmental audit report must be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise;

17. The Environmental Audit Report, must –

- 17.1. provide verifiable findings, in a structured and systematic manner, on–
 - 17.1.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and
 - 17.1.2. the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.
- 17.2. identify and assess any new impacts and risks as a result of undertaking the activity;
- 17.3. evaluate the effectiveness of the EMPr;
- 17.4. identify shortcomings in the EMPr;
- 17.5. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
- 17.6. indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;
- 17.7. indicate the date on which the operational phase was commenced with and the progress of the rehabilitation;
- 17.8. include a photographic record of the site applicable to the audit; and

17.9. be informed by the ECO reports.

18. The holder must, within 7-days of the submission of the 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).

Specific Conditions

19. 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: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human burials including grave goods and/or associated burial material.

20. A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.

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 activities.
2. This Environmental Authorisation does not authorise the decommissioning of the facility. This is identified as a separate activity for which environmental authorisation must first be obtained. Where decommissioning means to take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned.

Amendment of Environmental Authorisation and EMPr

3. If the holder does not commence with a listed activity within the period referred to in Section G, 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.

4. 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.

5. The validity period for the non-operational aspects (including date within which commencement must occur) and operational aspects, 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.

6. 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.

7. 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

8. 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).

9. 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.

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

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 Jaap de Villiers (Tel: 021 483 3721)
Room 809
8th 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 Jaap.DeVilliers@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 Jaap.DeVilliers@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.

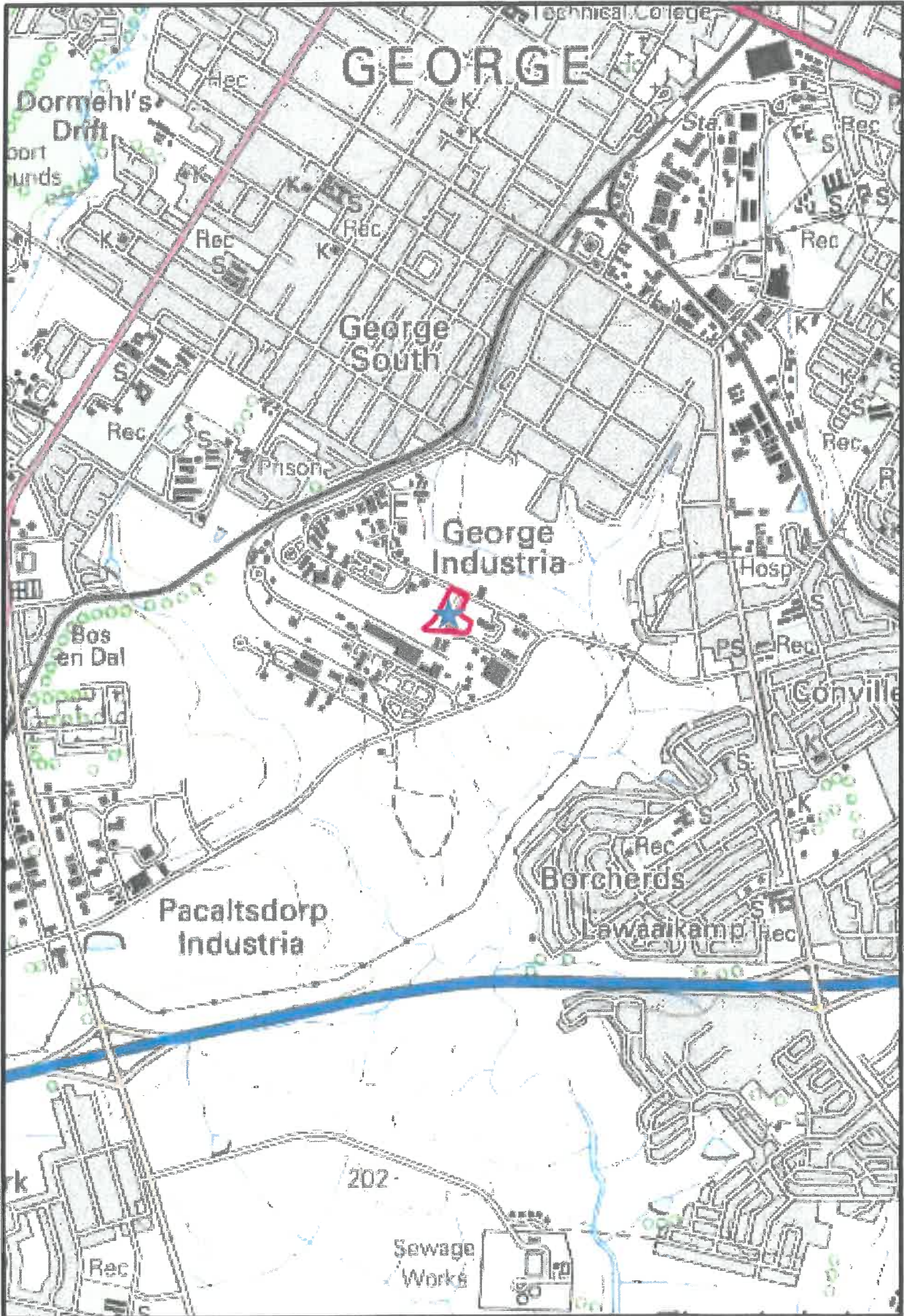
Yours faithfully



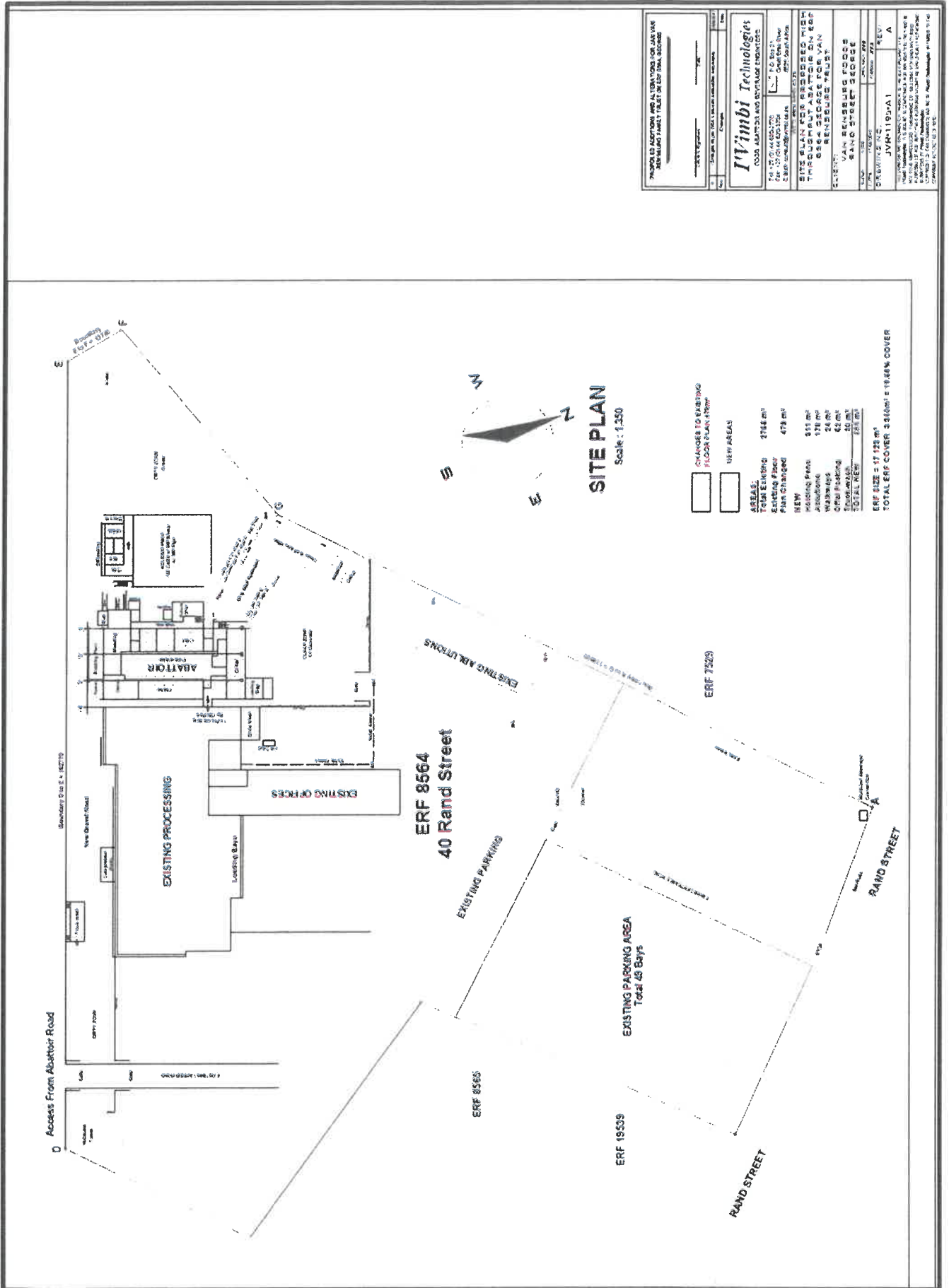
MR. GAVIN BENJAMIN
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 3)

DATE OF DECISION: 17/06/2018

ANNEXURE 1: LOCALITY MAP



ANNEXURE 2: SITE PLAN



PROPOSED TO BE CONSIDERED AS A DEVELOPMENT OF A RESIDENTIAL ZONE AND TO BE USED FOR RESIDENTIAL PURPOSES.

I'Vimbi Technologies
 FOOD ABATORIAL AND ADVANCE ENGINEERS

1001 VAN REEBURG BOULEVARD
 SANDHURST, KZN 3141

TEL: 031 261 4000
 FAX: 031 261 4001
 CELL: 082 900 1256
 E-MAIL: info@ivimbi.co.za

SITE PLAN FOR REBIDDING WITH THROUGHPUT ABATORIAL IN ERF 8564
 PREPARED BY: I'VIMBI TECHNOLOGIES
 CLIENT: VAN REEBURG BOULEVARD SANDHURST

DATE: 15/03/2018
 DRAWN: [Name]
 CHECKED: [Name]
 APPROVED: [Name]

PROJECT NO.: JVR-119JA-1
 SHEET NO.: A

Scale: 1:350

ANNEXURE 3: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, inter alia, the following:

- a) The information contained in the Application Form dated 12 March 2018, the EMPr submitted together with the BAR on 14 May 2018;
- 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 BAR dated 14 May 2018;
- e) The balancing of negative and positive impacts and proposed mitigation measures; and
- f) The site visit conducted on:
Date: 02 August 2018
Attended by: Ms Jessica Christie (DEA&DP) and Mrs Melissa Mackay (Cape-EAPrac)

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 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 and engagement with I&APs;
- fixing a notice board at the site and any alternative site where the listed activity is to be undertaken on 27 July 2017;
- giving written notice to the owners and occupiers of land adjacent to the site and any alternative site where the listed activity is to be undertaken, the municipality and ward councillor, and the various organs of state having jurisdiction in respect of any aspect of the listed activity on 27 March 2018;
- the placing of a newspaper advertisement in the 'George Herald' on 27 July 2017; and
- making the BAR available to I&APs for public review from 29 March 2018 to 30 April 2018.

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

The following Organs of State provided comment on the proposal:

❖ *Western Cape Government: Department of Health (DoH)*

The DoH has no objection to the proposed activity subject to the following conditions:

- all potable water supplied by George Municipality
- sewage is to be connected to George Municipality waste water system
- adequate number of sanitary facilities must be provided both male and female
- non-edible animal by-products must be disposed of at a registered disposal site
- no waste water or any drainage from holding pens will be allowed into nearby streams or off site
- holding pens must be cleaned on a regular basis
- requirements set by Dept. of Agriculture must be adhered to
- steps taken to prevent health hazard or nuisance on site
- owner must have EMPr to combat health hazard/nuisance

- drainage system must be able to accommodate the additional effluent from slaughtering
- all normal household waste to be incorporated into George Municipality solid waste system

The responses given by the EAP indicated that:

- An Effluent Discharge Permit will be applied for all effluent entering the municipal waste water system.
- Waste generated by the abattoir and lairages will be disposed of at any facility as long as the following conditions are met. The facility must be: - existing i.e. it must already be operational; - lawful i.e. it must be licensed by the appropriate competent authority to treat the waste material; - have capacity i.e. it must have sufficient capacity to accept the waste material.
- Holding pens will be cleaned out on a daily basis.
- The drainage system is designed to separate blood from the slaughter floor from wastewater from the processing areas. These drainage system plans will be included with the building plans to be submitted to the municipality.

❖ *Breede-Gouritz Catchment Management Agency (BGCMA)*

- The proposed activity does not trigger water use in terms of NWA
- No pollution of surface or groundwater resources may occur due to proposed activity.
- All relevant sections and regulations of the NWA regarding water use and pollution prevention must be adhered to.
- The Competent Authority 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 and in the EMPr.

❖ *Western Cape Government: Department of Agriculture (DoA)*

The DoA: State Veterinarian: Veterinary Public Health highlighted the following during the pre-application process:

- The guidelines for water consumption per slaughter unit was based on very old legislation and slaughter methods. This stated, the average water consumption to be approximately 900ℓ per unit.
- New hygienic slaughter procedures has been adopted by the majority of abattoirs, where carcasses are not washed or rinsed thus increasing shelf-life and a superior quality carcass, this drastically reduces water consumption. The existing Van Rensburg's Abattoir at Bulida Farm applies these procedures.
- According to guidelines based upon the findings of the CSIR, the current water consumption is between 330ℓ and 460ℓ per slaughter unit.
- Van Rensburg's Abattoir at Bulida Farm is currently consuming an average of 400ℓ per unit.
- Abattoir owners have become sensitised to our nation's water crisis and it can be safely said that owners are thus attempting to safely save wherever they can.

The DoA: Food Safety & Export Control, raised various issues regarding the design requirements of the proposed red meat abattoir. The EAP's response indicated that these matters would be addressed.

❖ *CapeNature*

- CapeNature acknowledges that there is no natural vegetation remaining on site. However, more detail regarding how the facility aims to control contaminated stormwater runoff will be required, especially regarding runoff from the holding pens. CapeNature will not support the discharge of contaminated stormwater off the site.
- Greater details and information regarding the removal and treatment of abattoir waste is required. Details such as the facilities estimated peak waste volumes, storage capacity and the ability of the registered facility to treat such volumes will need to be outlined.
- Greater detail regarding the holding pen design will be required.
- It is also recommended that the consultant consider registering the facility as a hazardous waste storage facility due to the probability that diseased animals may get delivered to the site. Alternatively, the procedures around how the facility plans to handle diseased animals, may need to be outlined.

The response given by the EAP adequately addressed the comments made by CapeNature as:

- The facility, when it reaches peak capacity [100 red meat units (RMU) per day]¹ will generate ±11.6 tons of biodegradable, organic waste. Waste materials must be removed on a daily basis to prevent nuisance impacts such as odour and pests. All waste treatment will take place off-site. A service agreement must be entered into between the proponent and a registered facility who is existing, lawful and have capacity to take the material. There are some options already available, such as Optimum Waste and SS Transport Composting with other options such as the new regional site which will be available in the near future.
- Holding pens will be made up of concrete floors with drains, a roof and railings to keep animals in. The design is standard and determined by DAFF as the mandated authority for the holding of animals prior to slaughter.
- The facility will not store hazardous waste in any kind of volume that would necessitate such a requirement. Furthermore, the abattoir will not be general abattoir but will only take animals from the applicant's own farm. The farm is already very strictly monitored for sick and diseased animals. Pre mortem inspections will take place on the farm which will greatly eliminate any chance of sick or diseased animals entering the premises, followed up pre mortem inspections at the abattoir and further post mortem inspections during processing.

❖ *DEA&DP Pollution & Chemicals Management*

- To avoid blockages to the municipal sewer system the manure from the lairages may not be washed down into the sewer system.
- Even though you have alluded to removing solid organic wastes and washing the residues into the municipal sewer system it is obviously very reasonable that the effluent washing from the abattoir will have a high COD levels which could cause processing issues at the municipal treatment works. The applicant must indicate what water quality monitoring will be implemented at the abattoir, the parameters to be monitored and the frequency thereof before release to the municipal sewerage system.
- There is still not a clarity where hazardous organic materials such as diseased carcasses are to be disposed of as legislatively prescribed. Please clarify within the Environmental Management Plan (EMPr) which possible hazardous sites might be recipients of such diseased carcasses.

The responses given by the EAP adequately addressed the comments made by DEA&DP Pollution and Chemicals Management as:

- the manure will be scraped up and collected as far as possible to prevent organic overloading.
- The applicant must undertake at least weekly water monitoring of the effluent leaving the site and measure it against the parameters identified in the George Municipality Water & Sanitation By-Laws for industrial effluent.
- It is unlikely that sick / infectious animals will be slaughtered at the facility, but in the event that they do, Optimum Waste is able to treat hazardous waste, as will the new regional site outside Mossel Bay. Optimum has already indicated that it has a 5.0 (five) ton capacity available if necessary.

❖ *George Municipality*

- A concern was raised that fat, urine and blood etc. entering the effluent water, could have a major impact on the waste water works and which will need to be incorporated in the application for an effluent permit.
- The property has been in disuse for a period and in the interim a general growth and development has led to the Outeniqua WWTW exceeding capacity design. The WWTW is currently being upgraded and will be completed in 2019/20.

¹ The Basic Assessment Report (dated 14 May 2018) refers to Large Stock Units (LSU), however, the term "unit" in relation to a quantity standard for determining throughput of facilities or infrastructure for the slaughter of animals, has the meaning assigned to it in Regulations promulgated in terms of the Meat Safety Act, 2000 (Act No. 40 of 2000) in this case, the Red Meat Regulations, 2004 (Government Notice no. 1072 of 17 September 2004). In light hereof, and to avoid confusion, the term "Red Meat Unit" (RMU) is utilised in this Environmental Authorisation.

The response given by the EAP adequately addressed the comments made by the George Municipality as:

- Water saving and discharge quality mechanisms are being built into the design of the facility to minimise the effects of the abattoir on the municipal systems.

❖ *Eden District Municipality*

The Eden District Municipality raised issues related to:

- compliance with relevant legislation pertaining to the Foodstuffs, Cosmetics and Disinfectants Act of 1972 as well as Regulations governing General Hygiene requirements for food premises and transport of food, in conjunction with the Eden District Municipality Municipal Health By-Laws 6566 of 17 October 2008.
- Adherence to the National Environmental Management: Air Quality Act, 2004 if practices will trigger Section 21 listed activities.

2. Alternatives

Alternative 1 (Herewith authorised)

Development of a high throughput capacity abattoir with daily slaughter capacity of 100 units within the existing building facility on Erf 8564 (Rand Street, George). Associated amenities to be developed on the transformed areas adjacent to the designated abattoir area. Waste treatment will take place at a registered waste management facility.

- ❖ Daily water use per RMU: $400\text{l} \times 100 = 40\,000\text{l}$
- ❖ Daily sewage per RMU: $310\text{l} \times 100 = 31\,000\text{l}$
- ❖ Daily waste volume per RMU: $116\text{kg} \times 100 = 11\,600\text{kg}$
- ❖ Employment opportunities: 24
- ❖ Daily slaughter capacity: 100 RMU
- ❖ Amenities to accommodate 100 RMU

Since there are no site constraints preventing the 100 RMU from being implemented, the services capacity has been confirmed and the waste treatment capacity also, the deciding factor when comparing the 50 RMU to the 100 RMU option is the socio-economic benefit that stems from the employment factor as well as the income generation potential. In an economy where job losses are more common than job creation, this socio-economic benefit outweighs the services capabilities.

Alternative 2

- ❖ Daily water use per RMU: $400\text{l} \times 50 = 20\,000\text{l}$
- ❖ Daily sewage per RMU: $310\text{l} \times 50 = 15\,500\text{l}$
- ❖ Daily waste volume per RMU: $116\text{kg} \times 50 = 5\,800\text{kg}$
- ❖ Employment opportunities: 14
- ❖ Daily slaughter capacity: 50 RMU
- ❖ Amenities to accommodate 50 RMU

The use and demand associated with the 50 RMU abattoir is half that of Alternative 1. Judging only on the services demand/supply this alternative may seem to be the preferred option. However, the loss of potential income from rates and taxes (including the industrial effluent levy) to the Municipality will be a loss when the 50 RMU is compared to the 100 RMU option.

"No-Go" Alternative

The status quo implies that the facility remains as is with no on-site abattoir, only the existing meat processing/packaging facility. The potential benefits/positive impacts associated with the preferred Alternative 1 would not realize in that additional employment opportunities would fall away, direct supply of meat to the meat processing facility (i.e. so improving logistics) and economic growth would not be stimulated. Water demand, sewage and electricity would be less under the Status Quo, but the potential socio-economic positive benefits mentioned above outweigh the additional demand.

3. Impact Assessment and Mitigation measures

3.1 Activity need and desirability

The property is currently zoned for 'Industrial II' and was used previously by *McCains* as their vegetable processing facility. The site is within an urban area that is designated for Industrial uses. Consent use for Industrial Zone II permits an abattoir to be operated on the premises.

3.2 Regional/ planning context

According to the Provincial Spatial Development Framework (PSDF) George is identified as a key area in its primary objective of growing the economy: "the PSDF focuses on opening-up opportunities in the Provincial space-economy, using public investment strategically to leverage private and community investments in urban and rural markets. The strategy revolves around: ii. Investing in new regional economic infrastructure to unlock the potential of the emerging Mossel Bay/George and Saldanha Bay/Vredenburg regional economic nodes, (Western Cape Provincial Spatial Development Framework March 2014). The PSDF shows the Western Cape having identified their main focus areas for economic growth to be in the urban space-economy looking mainly at public infrastructure investment which is what the Applicant is proposing to undertake. According to the PSDF one of their target areas is commercial agriculture with George also highlighted as a Growth Management Zone.

According to the Integrated Development Plan (IDP) of the George Municipality the first strategic goal of George is "Develop and Grow". The proposed development plans to add to the economic growth of George as well as align itself to the IDP's mention of its focus on retaining and expanding established businesses in George. *McCains*, which was a big economic generator in the area pulled out leaving the property vacant, lost jobs and loss to the local economy. The development is not likely to have a negative impact on people's health and wellbeing. It is situated in the George Industrial area which has no residential components and will not impact on the sense of place.

Apart from temporary noise impacts during construction, noises emanating from the activity will be associated with animal sounds and is likely to be of a low significance considering proximity to the existing Roelcor Abattoir on the adjacent property. The development of the proposed abattoir is on an existing site that used to accommodate a large scale vegetable processing/packaging facility; therefore, little additional pressure is being put on resources

3.3 Services/ bulk infrastructure

It is an existing facility and the additional demand for water, effluent and electricity can be accommodated by the Municipality.

3.4 Biophysical Impacts

The site has a flat gradient and it completely transformed with no indigenous vegetation remaining (confirmed by CapeNature in their comment dated 1 September 2017).

3.5 Biodiversity

The site is completely transformed. No biological aspects will be impacted.

3.6 Visual / sense of place

None as the main building is existing and the additions will not cause visual impacts.

3.7 Traffic

Access to the proposed abattoir will be via Abattoir Street which is an existing second access onto the premises. Delivery vehicles will bring animals in via this road and they will leave the premises via the same entrance. This entrance will be manned for security and biosecurity control.

3.8 Noise

No significant noise impacts are anticipated as there is a neighbouring abattoir directly adjacent.

3.9 Health issues

Because the site will house animals in lairages there will be animal sounds during the day (only on slaughter days). Operating hours are from 7h00 – 18h00 six days of the week. Other than animal smells which is not considered a nuisance odour, unpleasant odours can originate from waste materials such as manure/urine/blood/solid waste materials. These materials will however not be treated on the premises. Odours from these sources become a nuisance if the waste material is not collected on a daily basis. The Red Meat Regulations, 2004 stipulate that all waste materials must be removed from site on a daily basis. The additional measure of not having animals overnight on the premises will reduce the amount of urine and manure thereby addressing odour problems as well

3.10 Heritage / archaeological / built environment

The site is completely transformed with existing buildings on the property as well as surrounding properties that all resemble industrial use. No heritage features are present on or in proximity to the site. Because the abattoir will be housed within an existing building, with only the ancillary structures/buildings to be newly built, the character of the site will not be changed either.

3.11 Socio-economic

Employment opportunities and skills development in the industry will be created which improves local social development positively.

4. 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.

5. 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.

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