

Background Information Document

Pre-Application Notice: Rectification of the unlawful commencement of activities identified in terms of the Environmental Impact Assessment Regulations under the National Environmental Management Act and the NEM: Air Quality Act

13 June 2018

CEN Integrated Environmental Management Unit
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Sovereign Foods – Rocklands Poultry is the holder of a Provisional Atmospheric Emission Licence (PAEL) issued in terms of Section 42 of the NEM: Air Quality Act No. 39 of 2004 (Reference number 19/2/9/2/1/2 NMBM AEL 12/18(a)) for the operation of a rendering plant at their premises on Erf 12082 in Kruisrivier, Uitenhage. Figure 1 is an aerial image showing the relative location of the facility along Kruis River Road (central co-ordinates 33°46'23.12"S 25°22'43.00"E). Existing cookers at the facility were replaced with two new cookers without following the required notification and application procedures in terms of the EIA Regulations published under the National Environmental Management Act and the NEM:Air Quality Act. Consequently, Sovereign Foods is in non-compliance with their PAEL; specifically Condition 4.1.4 and 4.12.19 which notes the need to apply to the Nelson Mandela Bay Municipality for an amendment to the PAEL as well as a Basic Assessment application to the Department of Economic Development, Environmental Affairs and Tourism should any changes be made to the cookers.

CEN Integrated Environmental Management Unit has been appointed as the independent environmental assessment practitioner to prepare and submit an application to the competent authorities for rectification of the unlawful activities in terms of Section 24 G read together with sections 24 (F) and 7 of the National Environmental Management Amendment Act (Act No 62 of 2008) as amended. An amendment to the PAEL is also required from the NMBM. The application will include a retrospective assessment of impacts associated with the activities.

How Do I Participate

This is a pre-application notice whereby Interested and Affected Parties are invited to participate in the process by registering and submitting written comment to CEN IEM Unit within 30 days of this notice (i.e. by **13 July 2018**) to the details below. Further notices will follow once a draft report is available:

CEN IEM Unit – Dr Mike Cohen

36 River Road, Walmer, Port Elizabeth. 6070

Phone (041) 581 2983 / 082 320 3111 Fax (086) 504 2549

Email (preferred): steenbok@aerosat.co.za

A registration form is attached at the end of this BID. Upon submission of your registration and comments to CEN IEM Unit, you will be registered as an IAP, and will be included in the project database which will ensure that you receive future project information.

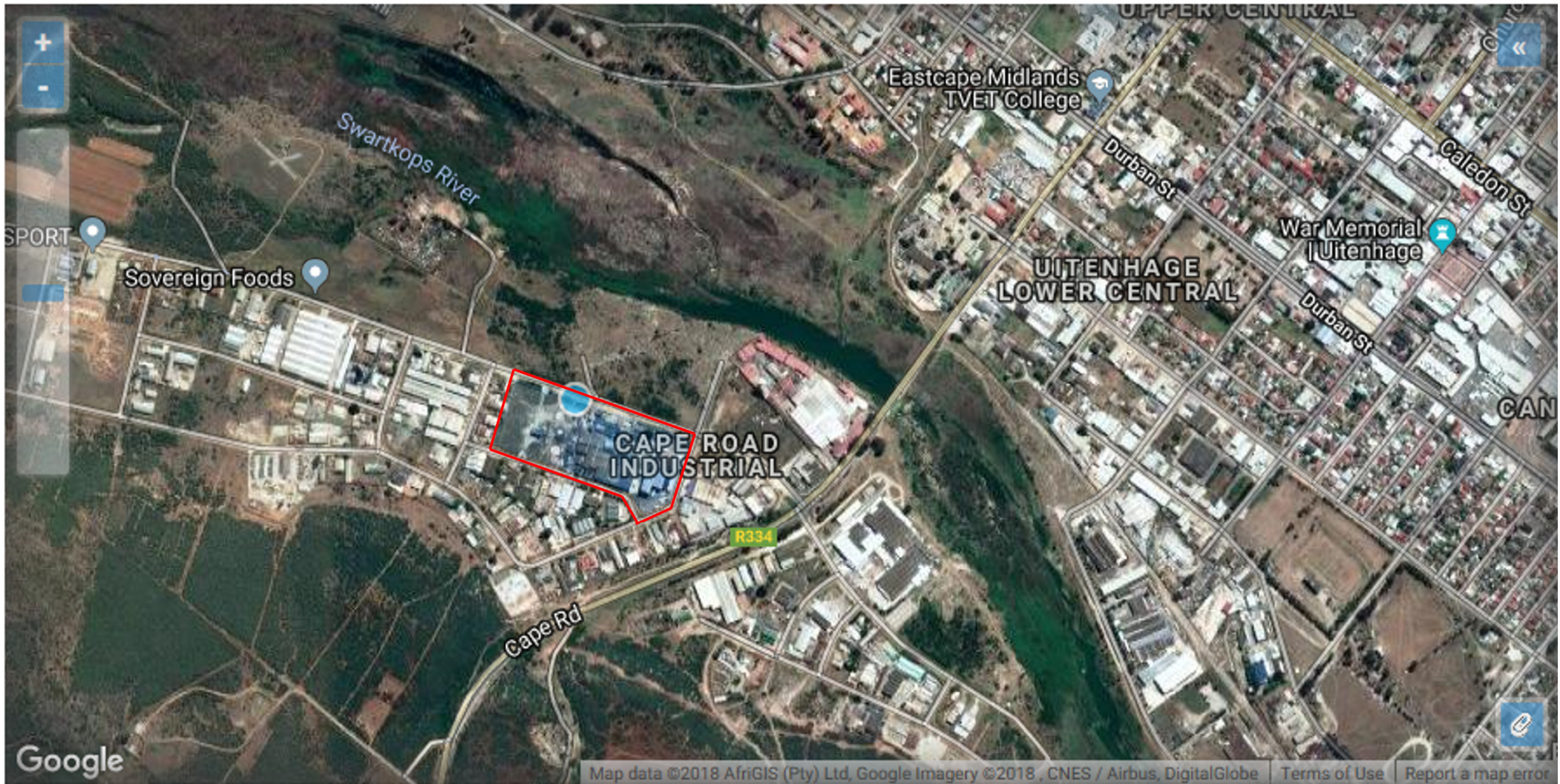


Figure 1: Aerial image showing the location of Erf 12082, Kruisrivier, Uitenhage.

Description of Operations at the Facility and the Need for the Application

Sovereign Foods – Rocklands Poultry operates a rendering facility at their poultry abattoir in the Cape Road Industrial Park in Uitenhage. The facility is located on Erf 12082 between Kruis River and Diesel Street, approximately 280 m west of the R334. Surrounding land uses include light industry, farming, vacant land, and natural open space (e.g. Swartkops River floodplain).

The rendering facility is used to process poultry waste from the facility. The rendering process includes the following stages:

- Inputs:
 - Non-edible byproduct, chicken blood, macerated dead chickens, and feathers are recovered from the abattoir waste stream and conveyed via pipelines to the rendering plant. Waste is recovered and batched to form three major components of the rendering PBY recipe:
 - Feathers are recovered from the chicken plucker units inside the abattoir. Feathers are dewatered at the rendering plant using two feather presses to remove excess water and to improve cooking efficiencies
 - Non-edibles are screened using static wedge wire screens to remove excess water and improve cooking efficiencies
 - Chicken blood is removed from the killing department bleed trough and pumped to a dedicated blood buffer tank, whereafter it is pumped into cookers for each batch
- At the start of the batch cook, the feathers, non-edibles and blood are loaded in two batch cookers via loading valves to the top of each cooker.
- All valves are closed, and cookers are pressurized to 350 kPa.
- The product is cooked under pressure for 40 minutes to ensure effective sterilization and break down of raw materials to form protein meal
- Once the raw material have been hydrolysed, pressure in the cooker vessels is reduced to atmospheric pressure (~40 minutes)
- Dry cooking cycle: the product is cooked for a further ~180 minutes at 180°C to reduce the moisture content of the protein meal to attain a final product moisture content of less than 10%. Ninety minutes into the drying cycle, wheat bran is added to bind oils and assist with reducing the moisture content of the meal
- Once the correct moisture content is reached, the product is removed from the batch cookers at the discharge valve by changing the direction of the cooker shaft.
- Meal is conveyed using screw augers to the Buhler screen
- The product is treated with a SANS registered anti-oxidant and bio-stat chemical at a set dosage rate in the inclined auger to ensure product quality and shelf life
- The PBY meal is screened to remove lumps and foreign materials, then weighed and bagged for transfer to the feed mill for internal consumption.

- Condensable hot vapours and gases from the batch cookers are passed through a water-cooled heat exchanger whereby the vapours are condensed to water
- The condensed water is treated in a Dissolved Air Flotation plant prior to being released into the municipal sewer system.
- Non-condensable gases are passed through a scrubber and bio filtration system to remove odours and pollutants prior to being discharged to the atmosphere

The process triggered Activity 10 under the list of activities published in terms of Section 21 of the NEM:Air Quality Act:

Category of Listed Activity	Sub-Category of Listed Activity	Listed Activity Name	Description of Listed Activity
10	-	Animal Matter Processing	Processes for the rendering, cooking, drying, dehydrating, digesting, evaporation or protein concentrating of any animal matter not intended for human consumption

A Provisional Air Emissions Licence was issued by the Nelson Mandela Bay Municipality for the specified activity. Sovereign Foods has in the interim changed the cookers specified in the licence application (which have a greater capacity), and did not apply for an amendment to the PAEL nor the required environmental approvals in terms of the EIA Regulations (2010 at the time). The Department of Economic Development, Environmental Affairs and Tourism (DEDEAT) and the NMBM Air Quality Section have indicated that Sovereign Foods is therefore in breach of their PAEL and the EIA Regulations, and that an application for rectification of the unlawful activities is required in terms of Section 24 G read together with sections 24 (F) and 7 of the National Environmental Management Amendment Act (Act No 62 of 2008) as amended.

The application will include:

- An audit of current activities at the facility in line with existing environmental approvals and licences to determine compliance with all relevant conditions.
- Stack sampling of air emissions at the facility to determine compliance with relevant air quality standards, and if any improvements are needed.
- A retrospective assessment of impacts associated with the installation of the 2 new cookers (and any other items that may be found to be non-compliant in the audit).
- The development of an Environmental Management Plan, inclusive of an Odour Management Plan for the facility.
- An application for an amendment to the existing PAEL.
- An application for rectification of the illegal installation of the 2 new cookers in terms of Section 24 G of NEMA

Description of the way forward

This BID is being distributed to stakeholders who may be affected by or interested in the application. This includes relevant state departments, non-government agencies, community representatives and leaders, and surrounding landowners and facilities. Posters advertising the development will be placed at visible locations near the site. The project will be advertised under the legal section of the *Herald* and *Die Burger*. This round of public participation is part of the pre-application process.

The next step will be to submit a formal application form to the authorities for registration. Once registered, a draft application report inclusive of a retrospective assessment of impacts will be compiled and sent to registered interested and affected parties (IAPs) and state departments for a 30 day comment period. The report will describe the project proposal and the surrounding environment, and will identify and assess the significance of potential impacts of the development on the biophysical and socio-economic environment. Comments received on the draft report will be collated, and the report updated to a final Section 24 G and PAEL amendment application for submission to the DEDEAT and the NMBM for their review.

Registration / Comment Sheet

Rectification of the unlawful commencement of activities identified in terms of the Environmental Impact Assessment Regulations under the National Environmental Management Act and the NEM: Air Quality Act – Sovereign Foods Rendering Plant, Uitenhage

I wish to register as an Interested and / or Affected Party and request that the following issues receive attention during the assessment process

Closing Date for Comments: 13 July 2018

Name of Respondent: _____

Organisation / Company: _____

Address: _____

Fax Number: _____

Tel Number: _____

Email: _____

Please use additional sheets as necessary

Signature: _____ Date: _____