

Sea based aquaculture development
zone (ADZ) in Saldanha Bay within
Saldanha Bay Local Municipality in the
Western Cape Province

26 August 2026

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Economic Development

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7th ENVIRONMENTAL AUDIT REPORT

In terms of the National Environmental Management Act, 1998
(Act No. 107 of 1998), as amended and the Environmental
Impact Assessment Regulations, 2014 (as amended).



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PROJECT & REPORT DETAILS	
Project Title:	Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay within Saldanha Bay Local Municipality in the Western Cape Province
Report:	Environmental Audit Report
Report Date:	26 August 2026
Applicant / Holder of the EA:	Department of Agriculture, Forestry and Fisheries: Aquaculture and Economic Development
Departmental Reference:	14/12/16/3/3/1/1728
DJEC Reference:	2026/17

APPOINTED AUDITOR
Doug Jeffery Environmental Consultants P.O. Box 44 Klapmuts 7625 Tel: 021 875 5272 <u>Author of Audit Report:</u> Tyron Momberg (BSc; BCB, Biodiversity & Conservation Biology), has 14 years' experience as an Environmental Control Officer (ECO) and has been conducting Environmental Audits on environmental authorisations, environmental management programmes and closure plans on behalf of the company since 2016. Refer to Appendix D for the Auditor's Curriculum Vitae.

DECLARATION

Declaration of the Auditor

I, **Tyron Momberg**, as independent consultant hereby declare/affirm the correctness of the information provided or to be provided as part of the environmental audit report, and that I:

- act/ed as the independent environmental auditor;
- in terms of the general requirement to be independent, other than fair remuneration for work performed/to be performed in terms of this audit report, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity.
- in terms of the remainder of the general requirements for an environmental auditor, am fully aware of and meet all the requirements and that failure to comply with any the requirements may result in disqualification.
- have and will not have any interest in the proposed activity;
- undertake the environmental audit based on information provided to me by the holder of the environmental authorisation, and additional information obtained during the audit period.
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).



Tyron Momberg
Environmental Auditor

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DEFINITIONS

Audit:	A systematic, independent and documented review by a suitably, qualified professional(s) of operations and practises to verify the status of relevant requirements.
Audit Criteria	The set of policies, procedures, or requirements used as a reference during an audit.
Audit Findings:	Results of the evaluation of the collected audit evidence against audit criteria. Audit findings can indicate either conformity or non-conformity with audit criteria.
Environmental Audit:	A systematic, documented verification process of objectively obtaining and evaluating evidence to determine whether specified environmental activities, events, conditions, management systems, or information about these matters conform with audit criteria, and communicating the results of this process to the client.
Environmental Management Programme:	A site-, project-, or facility-specific plan developed to ensure that environmental management practises to eliminate and control environmental impacts are followed during Commissioning and Operation phases.
Impact:	A description of the potential effect or consequence of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined time and space.
Mitigation:	Measures designed to avoid, reduce or remedy adverse impacts.
Non-compliance:	Issues that are in direct non-compliance with the requirements, commitments and/or management measures in approved EMPr.
Recycle:	A process where waste or wastewater is reclaimed for further use, this process involves the separation of waste from a waste stream for further use and the processing of that separated materials as a product or raw material.
Re-use:	To utilise articles from the waste or water again for a similar or different purpose without changing the form or properties of the articles.
Storage:	The accumulation of waste in a manner that does not constitute a treatment or disposal of that waste.
Waste:	Any substance, whether or not that substance can be reduced, re-used or recycled and recovered- • That is surplus, unwanted, rejected, discarded, abandoned or disposed of;

- Which the generator has no further use of for the purposes of production;
- That must be treated or disposed of;
- That is identified as waste by the Minister by notice in the Gazette and includes waste generated by the mining, medical or other sector, but a by-product is not considered waste;
- Any portion of waste, once reused, recycled and recovered, ceases to be waste.

Waste Classification:

Establishing-

- Whether a waste is hazardous or not based on the nature of its physical, health and environmental hazardous properties (hazard classes); and
- The degree or severity of the hazard posed (hazard categories).

Waste Generator:

Any person whose actions, production processes or activities including waste management activities, results in the generation of waste.

Waste Management:

Classifying, recycling, treatment and disposal of waste generated during construction, operation and decommissioning activities.

LIST OF ACRONYMS

ADZ	Aquaculture Development Zone
BAR	Basic Assessment Report
CV	Curriculum Vitae
DEA&DP	Western Cape Department of Environmental Affairs and Development Planning
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
NEM:BA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
WUL	Water Use Licence

ENVIRONMENTAL AUDIT REPORT REQUIREMENTS

Appendix 7 of the EIA Regulations, 2014 (as amended) contains the required contents of an Environmental Audit Report. The checklist below serves as a summary of how these requirements were incorporated into this Environmental Audit Report.

Requirement	Description
(1) An Environmental Audit Report prepared in terms of these Regulations must contain -	
(a) Details of – (i) The independent person who prepared the environmental audit report; and (ii) The expertise of independent person that compiled the environmental audit report.	Refer to page 2 and the Auditor CV attached as Appendix D .
(b) A declaration that the independent auditor is independent in a form as may be specified by the Competent Authority.	Refer to page 3 .
(c) An indication of the scope of, and the purpose for which, the Environmental Audit Report was prepared.	See Section 1.2 .
(d) A description of the methodology adopted in preparing the environmental audit report.	Refer to Section 3 .
(e) An indication of the ability of the EMPr, and where applicable the closure plan to – (i) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis; (ii) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and (iii) Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	Refer to Section 5 .

Requirement	Description
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge.	Refer to Section 4 .
(g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Refer to Section 3 .
(h) A summary and copies of any comments that were received during any consultation process.	Not applicable.
(i) Any other information requested by the Competent Authority.	Not applicable.

1. INTRODUCTION

The **Department of Agriculture, Forestry and Fisheries: Aquaculture and Economic Development**, was granted Environmental Authorisation (EA) by the Competent Authority, the Department of Forestry, Fisheries and the Environment (DFFE), in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) to undertake the listed activities as specified in the original EA (Ref. No. 14/12/16/3/3/1/1728), issued on 08 January 2018 (see **Appendix A**). Several appeals were submitted against the environmental authorization which were subsequently overruled by the then Minister of Environmental Affairs and the appeal decision was issued on 07 June 2018.

An amendment process was undertaken by the applicant, and an Amended EA was issued on 10 June 2019 (see **Appendix A**). The following amendments were approved:

Amendment 1: Amendment relating to the amendment of point 2 exclusion on page 10 of the EA.

Amendment 2: Amendment of Condition 29 to include all stages of development. An ECO is to be appointed for the operational phase as well.

Amendment 3: The amendment of condition 29.5 to allow practical implementation of the EA. Individual operators must ensure daily monitoring and the ECO should verify and sign off the daily monitoring findings on a monthly basis.

Amendment 4: Amendment relating to the change in contact details of the Holder of the EA.

An Amendment process was undertaken by the applicant, and an Amended EA was issued on 16 September 2020 (see **Appendix A**). The following amendments were approved:

Amendment 1: Amendment of the Small Bay (SB) North precinct coordinates to include the West Coast Aquaculture Operator (existing operator prior to the issuing of the EA) on page 5 of the EA.

Amendment 2: Amendment of the Big Bay (BB) North precinct coordinates (to include the correct boundary of the ADZ and to rename coordinate AC to Big Bay North) on pages 5-6 of the EA.

Amendment 3: Amendment of the Outer Bay (OB) South precinct coordinates to include the omitted coordinates for point AG on page 6 of the EA.

Amendment 4: Approval of the revised Environmental Management Programme (EMPr) (see **Appendix B**) and the inclusion of a condition to confirm that future amendments to the impact management actions of EMPr may be approved by the ADZ Management Committee (AMC).

Amendment 5: Amendment of Condition 32 of the EA to stipulate the frequency of the auditing and the submission of the audit report.

Amendment 6: Amendment of Condition 33 of the EA to specify final audit report submission requirements more appropriate to the type of development.

Amendment 7: Amendment of Condition 55.1 of the EA to specify the location where documents may be located for inspection by authorities.

Another Amendment process was undertaken by the applicant, and an Amended EA was issued on 02 May 2024 (see **Appendix A**). The following amendments were approved:

Amendment 1: Amended the list of approved species of seaweed on page 7 of the EA.

Amendment 2: Amendment of Condition 16 on page 13 of the EA.

In accordance with Regulation 34 of the EIA Regulations, 2014 (as amended), the Holder of the EA is required to conduct environmental audits to assess compliance with the conditions of the EA and the EMPr, and to submit Environmental Audit Reports to the Competent Authority. This Environmental Audit Report has been compiled in accordance with Regulation 34 of the EIA Regulations, 2014 (as amended), and adheres to the requirements outlined in Appendix 7 of the regulations.

The primary objective of this Environmental Audit Report is to assess the Holder of the EA's compliance with the EA and EMPr in relation to the operation of the Saldanha Bay ADZ.

Doug Jeffery Environmental Consultants (Pty) Ltd., was appointed by NCC Environmental Services (Pty) Ltd on behalf of the Holder of the EA, to conduct this environmental audit. The purpose of this audit is to determine compliance with the conditions of the EA and submit an Environmental Audit Report to the DFFE as required in the amended Condition 32 of the EA (see **This** audit includes all Operators in both precincts however only a handful of Operators were visited during this audit reports site inspection. This report presents the findings of assessments conducted for the following Operators that were visited:

Small Bay: Blue Sapphire Pearls and Aqua Foods.

Big Bay North: Ocean Grown Aquaculture, Saldanha Bay Oyster Company, Pluto Mussels and Mika Growers (A & B).

Table 1). The Environmental Audit required in terms of the amended Condition 32 is required annually, conducted over the period of five (5) consecutive years, after which the audit frequency can be reviewed based on the audit findings, taking into account the processes for such auditing as prescribed in Regulation 34 of GN R 982. This audit report will be the seventh (7th) consecutive annual audit report undertaken. The previous annual audit report was issued in February 2025 and no non-compliances with the EA or EMPr were recorded.

This audit includes all Operators in both precincts however only a handful of Operators were visited during this audit reports site inspection. This report presents the findings of assessments conducted for the following Operators that were visited:

Small Bay: Blue Sapphire Pearls and Aqua Foods.

Big Bay North: Ocean Grown Aquaculture, Saldanha Bay Oyster Company, Pluto Mussels and Mika Growers (A & B).

Table 1: Environmental Authorisations Issued

Decision	Date issued	Reference
Environmental Authorisation	08 January 2018	14/12/16/3/3/1/1728
Amended Environmental Authorisation	10 July 2019	14/12/16/3/3/1/1728/AM1
Amended Environmental Authorisation	16 September 2020	14/12/16/3/3/1/1728/AM2
Amended Environmental Authorisation	02 May 2024	14/12/16/3/3/1/1728/AM3

1.1. Scope and Purpose of this Report

The scope of this Environmental Audit Report is to assess the Holder of the EA's compliance with the EA and EMPr in relation to the to the operation of the Saldanha Bay ADZ. The purpose of the environmental audit report is to report on compliance with the EA and EMPr to the Competent Authority. The audit report aims to conform to the requirements of Regulation 34 of the EIA regulations, 2014 (as amended).

1.2. Site Location

The site where the authorised listed activities were being undertaken is Saldanha Bay in the Western Cape Province and can be found in Figure 1 below:

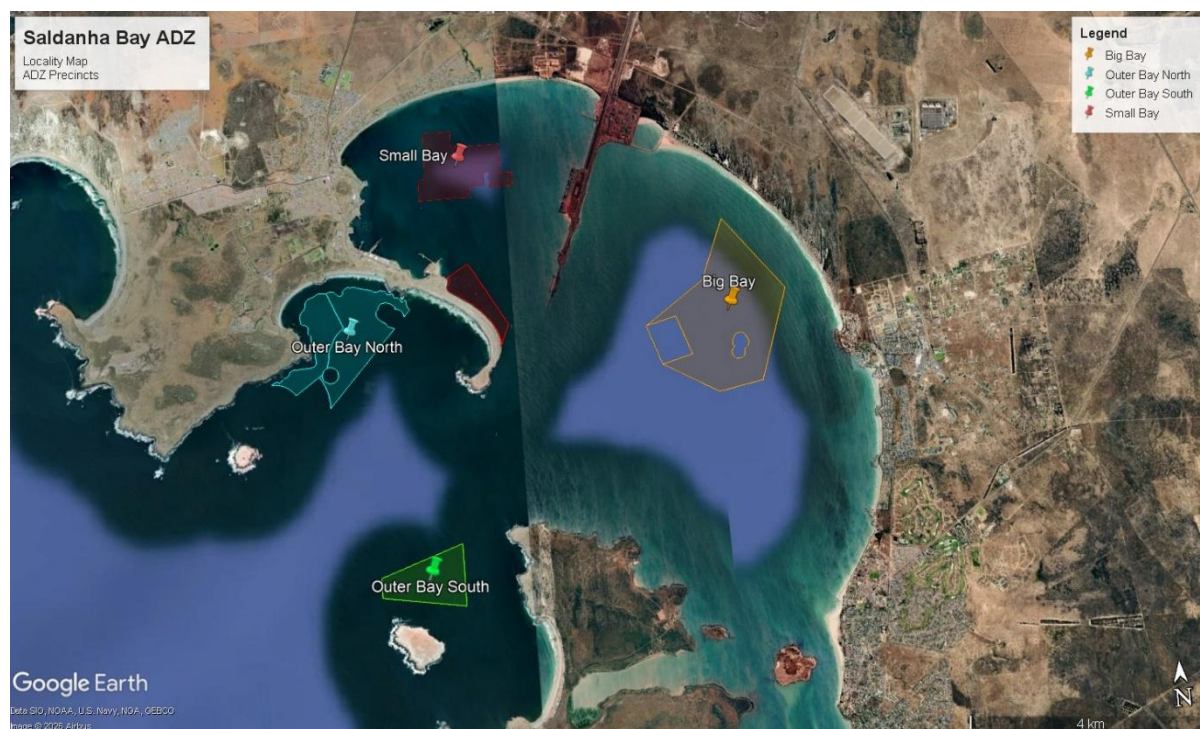


Figure 1: Location of the Saldanha Bay Aquaculture Development Zone

1.3. Approved Activities

The recommended post-mitigation scenario for the project will include the following:

(a) ADZ Areas

The recommended post-mitigation ADZ area comprises four precincts in Saldanha Bay, adding 420ha of new aquaculture areas in Saldanha Bay for a total ADZ comprising 884ha:

- * Small Bay: No additional aquaculture areas;
- * Big Bay North: North of Mykonos entrance channel;
- * Outer Bay North: North of Port entrance channel, near Malgas Island; and
- * Outer Bay South: South of Port entrance channel, near Jutten Island.

Currently farmed areas will be incorporated into the ADZ:

Area	Currently Allocated	Currently Farmed	New Area	Total Future
Small Bay	163	125	-	163

Big Bay North	254	25	155	409
Outer Bay North	37	1	179	216
Outer Bay South	10	-	86	96
Total	464	151	420	884

(b) Species and methods for aquaculture production

The following species are considered for farming in the ADZ:

- Currently cultivated bivalve species:
 - i. Pacific oyster (*Crassostrea gigas*)
 - ii. Mediterranean mussel (*Mytilus galloprovincialis*)
 - iii. Black mussel (*Choromytilus meridionalis*)
- iv. New indigenous shellfish species:
 - v. Abalone (*Haliotis midae*)
 - vi. South African scallop (*Pecten suidicostatus*)
- New indigenous finfish species:
 - i. White Stumpnose (*Rhabdosargus globiceps*)
 - ii. Kabeljou (*Argyrosomus inodorus*)
 - iii. Yellowtail (*Seriola lalandi*)
- Alien finfish species:
 - i. Atlantic salmon (*Salmo salar*)
 - ii. Coho salmon (*Oncorhynchus kisutch*)
 - iii. King/Chinook salmon (*Oncorhynchus tshawytscha*)
 - iv. Rainbow trout (*Oncorhynchus mykiss*)
 - v. Brown trout (*Salmo trutta*)
- Seaweed:
 - i. Indigenous seaweed species

Viable production methods for farming in the ADZ:

- Longlines for bivalve culture, comprising a surface rope with floats and moored at each end to fix the line in position. The production ropes for mussels or oyster racks are then suspended from the surface rope;
- Rafts for bivalve culture, comprising of a floating top structure moored to the seabed from which mussel ropes are suspended;
- Cages for finfish production, constructed of circular flexible high-density polyethylene with multi-mooring systems; and
- Barrel culture for abalone, which can be deployed from rafts and longlines.

Table below summarises the Saldanha Bay ADZ areas, species and methods:

ADZ Precinct	Recommended species (*individual species as per list provided above)	Recommended Production Method
--------------	--	----------------------------------

Small Bay	Currently cultivated bivalve species* Indigenous shellfish species not currently cultivated* Seaweed*	Rafts/Longlines
Big Bay - North	Currently cultivated bivalve species* Indigenous shellfish species not currently cultivated* Seaweed*	Rafts/Longlines
	Indigenous finfish species* Alien finfish*	Floating Cages (Depths of more than 13m)
Outer Bay - North	Mediterranean mussel (Mytilus galloprovincialis) Black mussel (Choromytilus meridionalis)	Sub-surface Longlines
	Indigenous finfish species* Alien finfish species*	Floating Cages
Outer Bay - South	Mediterranean mussel (Mytilus galloprovincialis) Black mussel (Choromytilus meridionalis)	Sub-surface Longlines
	Indigenous finfish species* Alien finfish species*	Floating cages

(c) Extent of identified post-mitigation ADZ areas for bivalves and fish (ha)

Area	Total ADZ Area	Bivalves	Fish
Small Bay	163	163	-
Big Bay North	409	367	42
Outer Bay North	216	76	140
Outer Bay South	96	-	96
Total	884	606	278

(d) Production Volumes

• Bivalve Production

Based on calculations of the ecological carrying capacity of Saldanha Bay; the ADZ could support total aquaculture bivalve production of up to 27 597 tpa ungraded / 15 203 tpa graded production.

• Finfish Production

Based on estimated production of nutrients from fish farming, finfish production should be limited to 5 000 tpa. Assuming an average fish farming density of 40 t/ha, the recommended ADZ area could accommodate up to 10 000 tpa finfish production, However, 5 000 tpa will only be exceeded if deemed acceptable based on stringent environmental monitoring.

(e) Sea-based Aquaculture Activities

Sea-based activities associated with aquaculture in the ADZ include:

- Servicing and maintenance of aquaculture structures (such as rafts, lines, cages);
- Harvesting of cultivated species;
- Initial processing of bivalves, including de-clumping and grading, typically on the raft or support vessel; and
- Vessel trips between the shore and aquaculture areas, e.g. to service structures or harvest species.

(f) Associated Sea-based Infrastructure

Besides the rafts, lines, cages and barrels (including moorings and flotation devices) required for aquaculture, the following associated sea-based infrastructure is required:

- Navigational lights demarcating aquaculture areas; and
- Mooring facilities for boats.

Note that this environmental authorisation **does not include**:

1. Authorisation of the land-based facilities, since the detailed information for land-based facilities will depend on the specific cultivated species and production methods chosen by the individual operators within the ADZ. Should the land-based activities of the individual operators leasing areas within the ADZ trigger any listed activities in terms of the NEMA EIA Regulations, authorisation for those land-based activities will need to be obtained from the Competent Authority prior to commencement of the activity by the individual operators;

2. Authorisation of currently allocated and farmed areas within the ADZ, since these areas are already existing; and

3. Authorisation of the following areas, which formed part of the application for environmental authorisation. The reason for not authorising them is because separate environmental authorisations have been issued to other aquaculture operators for the same areas:

- a. Southern Cross Salmon Farming (Pty) Ltd application located within a recommended ADZ area within Outer Bay South area (10 ha) and Outer Bay North area (20 ha) with the following DEA Reference number 14/12/16/3/3/1/1728/1.
- b. Molapong Aquaculture (Pty) Ltd application located within a recommended ADZ area within Big Bay North area (approximately 40ha) and a site near Jutten Island (to be expanded from 1 ha to 15ha) with following the coordinates and DEA reference number 14/12/16/3/3//1728/2.



Figure 2: Small Bay ADZ and various Operators.



Figure 3: Big Bay North ADZ and various Operators.

2. AUDIT REPORT REGULATORY REQUIREMENTS

This audit has been conducted in terms of Regulation 34 of the EIA Regulations, 2014 (as amended).

Regulation 34(1) requires that, for as long as the EA, EMPr, and, where applicable, the closure plan remain valid, the holder of the EA must:

- (a) Ensure that the compliance with the conditions of the EA, EMPr, and the closure plan (in the case of a closure activity), is audited; and
- (b) Submit an Environmental Audit Report to the relevant Competent Authority.

Regulation 34(2) outlines the required content and approach of the audit, stipulating that the Environmental Audit Report must:

- (a) Be prepared by an independent person with the relevant environmental auditing expertise.
- (b) Provide verifiable findings, in a structured and systematic manner, on:
 - i. The level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation, EMPr and the closure plan in the case of a closure activity; and
 - ii. The ability of the measures contained in the EMPr and closure plan to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.
- (c) Contain the information set out in Appendix 7 of the EIA Regulations as amended; and
- (d) Be conducted and submitted to the Competent Authority at intervals specified in the EA.

Regulation 34(3) further requires that the audit must assess:

- (a) The ability of the EMPr, and the closure plan (where relevant), to adequately avoid, manage and mitigate environmental impacts associated with the activity on an ongoing basis, as well as during the closure of the facility; and
- (b) The level of compliance with the provisions of the EA, EMPr, or closure plan.

Regulation 34(4) provides that, where the audit findings indicate:

- (a) Insufficient mitigation of environmental impacts associated with the undertaking of the activity; or
- (b) Insufficient levels of compliance with the EA, EMPr or closure plan,

the holder must, when submitting the Environmental Audit Report to the Competent Authority, include recommendations to amend the EMPr or closure plan in order to address the shortcomings identified in the environmental audit report.

Regulation 34(5) states that, if amendments to the EMPr or closure plan are necessary, these must undergo a public participation process, agreed upon with the Competent Authority. The process must be appropriate to ensure that potential and registered interested and affected parties (I&APs), including organs of state with jurisdiction over any aspect of the activity, are informed and afforded the opportunity to comment before the proposed amendments are submitted for approval.

Regulation 34(6) requires that, within seven days of submitting the Environmental Audit Report to the Competent Authority, the holder of the EA must notify all potential and registered I&APs of the submission and make the report immediately available:

- (a) To anyone on request; and
- (b) On a publicly accessible website, where the holder has such a website.

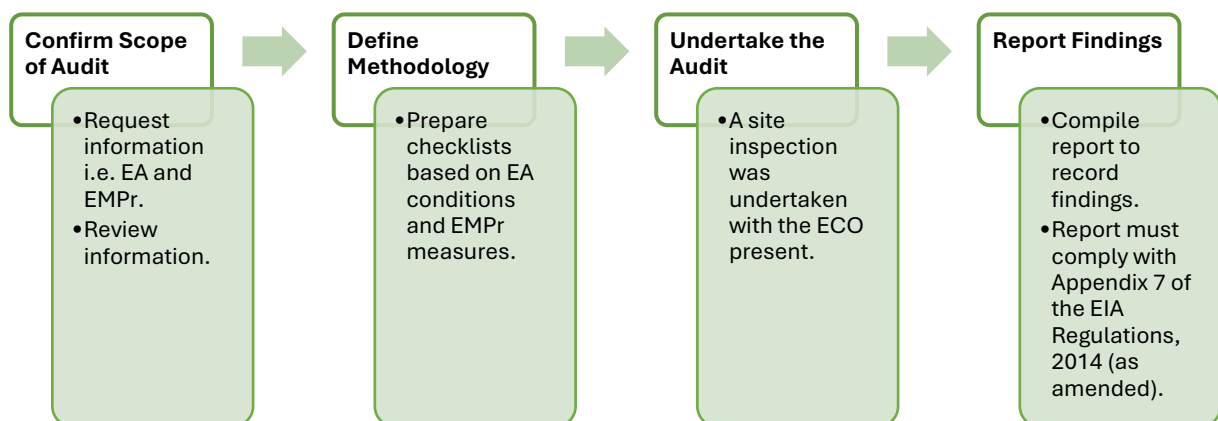
Regulation 34(7) confirms that an Environmental Audit Report must contain all information outlined in Appendix 7 of the EIA Regulations, 2014 (as amended).

3. METHODOLOGY

3.1. Audit process

The Environmental Audit Report is based on evaluation of the activities on site in relation to the review of the EA, monitoring reports from the Environmental Control Officer (ECO), information provided during the audit and verified *via* an on-water site inspection as well as a beach site inspection. The audit methodology was designed to ensure compliance with the requirements of Regulation 34(2) and Appendix 7 of the EIA Regulations, 2014 (as amended).

The audit methodology followed is outlined below.



- **Information gathering:** Relevant information was gathered from the ECO, records, and documentation to support the audit findings.
- **Review of EA, EMPr and ECO monitoring reports:** A thorough review of the EA, EMPr and ECO monitoring reports was conducted to understand the environmental requirements and commitments.
- **Site inspection:** Two site inspections were conducted to verify compliance with the EA and EMPr.

The audit methodology ensured that the report provides verifiable findings, in a structured and systematic manner, on the level of performance against and compliance of the project with the provisions of the EA and closure plan (where applicable).

4. ASSUMPTION, UNCERTAINTIES/ GAPS IN KNOWLEDGE

Assumptions

This audit report is based on the assumption that all information provided by the Holder of the EA and the appointed ECO is accurate and complete. The audit findings are reliant on the accuracy of the information provided.

Uncertainties

The audit was conducted based on the information available, which included the documentation reviewed below and personal observations made during the site visit and inspection. While every effort was made to verify the information, the audit is limited by the availability and accuracy of the data provided.

Gaps in Knowledge

No significant gaps in information were identified or recorded during the audit.

Documentation Reviewed

The following documentation was provided to Doug Jeffery Environmental Consultants and reviewed as part of this audit:

- EA and Amendments
- EMPr
- ECO Monitoring Reports (Monthly)
- Previous Regulation 34 Audit Reports (6 years of audits)
- Farm Monitoring Reports (Monthly Farm Monitoring Reports)
- CF (3 meetings) and AMC Meeting minutes (6 meetings)
- KMZ Files
- Beach Clean-up Reports (Monthly)
- Survey Reports
- Registers (Monthly)

Site Visit

An on-water site inspection was conducted on the 25th of March 2026, and a beach site inspection was conducted on the 26th of March 2026 by Tyron Momberg (author), representing Doug Jeffery Environmental Consultants, to observe and verify the approved activities and their implementation. The appointed ECO accompanied the auditor during the inspections.

5. COMPLIANCE AUDIT

The EA for the project was formally issued on the 08th of January 2018. This audit addresses the conditions specified by the Competent Authority, DFFE, in the issued EA.

Compliance Assessment

The compliance assessment is presented in **Table 2 and Table 3**, which summarise the conditions and requirements of the EA and EMPr, respectively. Each table includes an assessment of the level of compliance, accompanied by the Auditor's findings and recommendations.

Assessment criteria

The following assessment criteria are used to evaluate compliance:

Green	Indicates full compliance with the condition.
Yellow	Indicates partial compliance with the conditions, with the reasons provided.
Red	Indicates serious or ongoing non-compliance requiring immediate attention.
Blue	Indicates items that are not applicable, not audited or were deemed information items .

5.1. Compliance with the EA

Table 2: Audit of compliance with the EA

#	EA Condition	Findings		Recommendation
EA issued: 08 January 2018				
1	The post-mitigation scenario for the construction of the Sea-Based Aquaculture Development Zone in as Saldanha Bay within West Coast District Municipality in the Western Cape Province is approved per the geographic coordinates cited above (excluding currently allocated and farmed areas, and areas where authorisations have been issued to other aquaculture operators for the same areas, as per the above).	Information	Information item. The Holder should take note.	No further action required.
2	Authorisation of the activity is subject to the conditions contained in this environmental authorisation, which form part of the environmental authorisation and are binding on the holder of the authorisation.	Information	Information item. The Holder should take note.	No further action required.
3	The holder of the authorisation is responsible for ensuring compliance with the conditions contained in this environmental authorisation. This includes any person acting on the holder's behalf, including but not limited to, an agent, servant, contractor, sub-contractor,	Information	Information item. The Holder should take note. The Holder takes all responsibility for compliance with the conditions of the EA.	No further action required.

#	EA Condition	Findings		Recommendation
	employee, consultant or person rendering a service to the holder of the authorisation.			
4	The activities authorised may only be carried out at the property as described above.	Partial compliance	The majority of the activities were being carried out within the coordinates of the Saldanha Bay Aquaculture Development Zone (ADZ). During the on-water inspection by the ECO, it seemed like some of the longlines of Ocean Grown Aquacultures were situated slightly outside of the allocated coordinates of the Saldanha Bay ADZ.	The Holder must ensure the Operator moves all longlines to within the Saldanha Bay ADZ and allows the disturbed area to rehabilitate naturally.
5	Any changes to, or deviations from, the project description set out in this environmental authorisation must be approved, in writing, by the Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further environmental authorisation in terms of the regulations.	Compliant	According to the currently appointed ECO, no new changes have taken place that require an amendment process to be undertaken. The original EA was issued on the 08th of January 2018 (14/12/16/3/3/1/1728). An appeal was submitted against the environmental authorization which was subsequently overruled and the appeal decision was issued on 18 November 2018. Due to changes that have occurred, amended EA's have been issued on the 10th of July 2019 (14/12/16/3/3/1/1728/AM1), 16th of September 2020 (14/12/16/3/3/1/1728/AM2) and 02 May 2024 (14/12/16/3/3/1/1728/AM3) (See Appendix A).	No immediate action required.

#	EA Condition	Findings		Recommendation
6	The holder of an environmental authorisation must apply for an amendment of the environmental authorisation with the competent authority for any alienation, transfer or change of ownership rights on the property on which the activity is to take place.	Compliant	Compliant by absence of action. No transfer or change of ownership rights has been undertaken since the last external audit was conducted according to the appointed ECO.	No immediate action required.
7	This activity must commence within a period of five (05) years from the date of issue of this environmental authorisation. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.	Compliant	The construction phase commenced on 11 February 2019 which was the date of installation of the first infrastructure by Blue Sapphire Pearls. As the appeal authorization was issued on 7 June 2018, the project commenced within the validity period of the environmental authorization.	No further action required.
8	Commencement with one activity listed in terms of this environmental authorisation constitutes commencement of all authorised activities.	Information	Information item. The Holder should take note. All listed activities are deemed to have been commenced with.	No further action required.
Notification of authorisation and right to appeal				
9	The holder of the authorisation must notify every registered interested and affected party, in writing and within 14 (fourteen) calendar days of the date of this environmental authorisation, of the decision to authorise the activity.	Compliant	All I&AP's were notified within 14 calendar days of the date the EA was issued, of the decision to authorise the activity (See Appendix H).	No further action required.

#	EA Condition	Findings		Recommendation
10	The notification referred to must — 10.1. Specify the date on which the authorisation was issued; 10.2. Inform the interested and affected party of the appeal procedure provided for in the National Appeal Regulations, 2014; 10.3. Advise the interested and affected party that a copy of the authorisation will be finished on request; and 10.4. Give the reasons of the competent authority for the decision.	Compliant	All information required to be in the notification of the I&AP's letter as per condition 10, had been included accordingly.	No further action required.
Commencement of the activity				
11	The authorised activity shall not commence until the period for the submission of appeals has lapsed as per the National Appeal Regulations, 2014 and no appeal has been lodged against the decision. In terms of section 43(7), an appeal under section 43 of the National Environmental Management Act, 1998 will suspend the environmental authorisation or any provision or condition attached thereto. In the instance where an appeal is lodged you may not commence with the activity until such time that the appeal has been finalised.	Compliant	An appeal was submitted against the environmental authorization which was subsequently overruled and the activity commenced only after the appeal decision was issued on 18 November 2018 according to the first External Regulation 34 Audit Report (See Appendix H).	No further action required.

#	EA Condition		Findings	Recommendation
Management of the activity				
12	The Environmental Management Programme (EMPr) submitted as part of the Application for EA is hereby approved. This EMPr must be implemented and strictly adhered to. Individual operators must compile individual site specific EMPrs for the individual farms that are to be leased in the ADZ. The individual EMPrs must be in line with the recommendations of this overarching approved EMPr and the conditions of this EA. The individual EMPrs must be submitted to the ADZ Monitoring Committee (AMC) (see Condition 12 below) for endorsement and to the Department for record keeping purposes, before commencement of operations by the individual operator.	Compliant	The compliance with the implementation of the EMPr was audited in Table 3 below. Individual EMPr's have been compiled for each Operator within the ADZ and are available on the EDMS portal (See Appendix H). Endorsement letters from the AMC and Department have been provided to the Auditor for individual EMPr's.	No immediate action required.
ADZ Management				
13	To ensure appropriate ADZ management, two management bodies must be established by the holder of the authorisation prior to commencement of the activity.	Compliant	The Auditor has been made aware of two management bodies namely, the ADZ Management Committee (AMC) and the Consultative Forum (CF) who have been established to ensure appropriate management of the ADZ (See Appendix H). The ADZ Management Committee (AMC) was established	No immediate action required.

#	EA Condition	Findings		Recommendation
			on 27 July 2018 (date of inaugural meeting). The ADZ Consultative Forum (CF) was established on 6 November 2018 (date of inaugural meeting). The authorized activity commenced on 11 February 2019.	
	13.1. An ADZ Management Committee (AMC), comprising of, but not limited to, the Department of Agriculture, Forestry and Fisheries (DAFF), the Department of Environmental Affairs (DEA) (Oceans and Coasts / Biodiversity Branches) DEA (Integrated Environmental Authorisations), DEA Compliance and Monitoring, the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) and the Transnet National Ports Authority (TNPA), to fulfil a coordinating and supervising role and ensure compliance with the EMPr throughout all phases of aquaculture farming in the ADZ ; and	Compliant	The AMC has been established, regular meetings are held according to the ECO and all matters regarding the management of the ADZ are discussed (See Appendix H). Meeting minutes suggest compliance.	No immediate action required.
	13.2. A Consultative Forum that includes other relevant government departments, authorities and relevant local / public interest organisations, to review environmental monitoring data, advise on ADZ management and make	Compliant	The CF has been established; regular meetings are held according to the ECO and matters regarding monitoring data and management of the ADZ are discussed (See Appendix H). Part of the CF's role is to provide recommendations to the AMC as per the advert published in the	ECO/Holder – Consider documenting recommendations given to the AMC by the CF in meeting minutes.

#	EA Condition		Findings	Recommendation
	recommendations to the AMC. The Consultative Forum will therefore feed into the AMC through the outputs {recommendations and advice} that it provides to the AMC for consideration.		Weslander although no evidence showing that the CF has provided recommendations to the AMC has been observed.	
14	Upon establishment of the Consultative Forum, a notice must be published in a local newspaper announcing the inception of the Consultative Forum, providing contact details for the Consultative Forum Secretariat and inviting interested stakeholders to register on a stakeholder database to receive relevant notifications about the ADZ.	Compliant	The advert was published in the Weslander newspaper on the 26 th of July 2018 (See Appendix H) and included all of the requirements as per condition 14. A stakeholder database has also been established with all the emails addresses of the relevant stakeholders (See Appendix H).	No further actions required.
ADZ Management Committee				
15	The function of the AMC is to oversee, facilitate, manage and monitor aquaculture operations in the ADZ. DAFF, as the applicant, is primarily responsible for day-to-day management of the ADZ and ensuring the implementation of and adherence to the overarching approved EMPr, with appropriate support and guidance provided by the other AMC members:	Compliant	Refer to the Terms of Reference of the AMC (See Appendix H). The activities of the AMC as per the latest meeting minutes suggest compliance.	No immediate action required.

#	EA Condition	Findings		Recommendation
16	The AMC must be consulted before the appointment of the project ECO, to ensure that they are suitably qualified and have the relevant expertise to monitor and ensure compliance with the conditions of the EA and EMPr.	Compliant	The AMC received the CV of the latest ECO from NCC-Group, prior to their appointment. The AMC discussed and approved the appointment of the ECO in the meeting from the AMC Record of Proceedings dated 24 November 2025 (See Appendix H).	No immediate action required.
17	The AMC must meet before the commencement of construction activities to appoint a chairperson and to discuss the Terms of Reference (the member constitution, purpose, outcomes, roles and functions of the AMC, including but not limited those specified in this authorisation). From then on, the AMC must sit once every two months, and special meetings can be convened on special or emergency situations.	Compliant	The inaugural meeting of the AMC took place on 27 July 2018 which was before commencement of the authorized activity according to the first External Regulation 34 Audit Report. The meeting minutes from the inaugural meeting suggest compliance (See Appendix H). The currently appointed ECO confirmed the AMC meet every 2 months as can be verified by the meeting minutes.	No immediate action required.
18	The Chairperson must be an independent person, with experience in the environmental management and marine aquaculture field and/ or industry.	Compliant	The CV of the current Chairman has been sent to the Auditor (See Appendix H). The CV of the Chairman suggests compliance. The Terms of Reference of the AMC confirm the Chairman/s must be independent.	No further action required.
19	Key functions of the AMC are to: 19.1. Monitor aquaculture operators' compliance with the EMPr and ADZ EA conditions;	Compliant	Refer to the Terms of Reference of the AMC (See Appendix H). The activities of the AMC as per the latest meeting minutes suggest compliance.	No immediate action required.

#	EA Condition	Findings	Recommendation
	19.2. Oversee environmental monitoring related to ADZ aquaculture activities in Saldanha Bay; 19.3. Monitor production volumes in the ADZ; 19.4. Make decisions based on the outcomes of environmental monitoring, which could lead to the amendment of operations within the authorised ADZ; 19.5. Future amendments to the EMPr may be approved by the AMC, provided that the amendments are in terms of Regulation 36{1} of the EIA Regulations, 2014, as amended, which states that: “Where an amendment is required to the impact management actions of an EMPr, such amendments may immediately be effected by the holder and reflected in the next environmental audit report submitted as contemplated in the environmental authorisation and regulation 34”; 19.6. Settle disputes regarding the interpretation of requirements in the EMPr and EA; 19.7. Consider the advice, recommendations and inputs of the	The ECO presents the monthly ECO monitoring report to the AMC which includes compliance with EA and EMPr, production volumes, incidents, etc. The ECO’s monthly summary report is sent to the CF.	

#	EA Condition	Findings		Recommendation
	Consultative Forum with regards to environmental monitoring within Saldanha Bay and the management of the ADZ. 19.8. Receive and manage stakeholder comments; 19.9. Record and, if necessary, coordinate a response to environmental incidents related to aquaculture operations; 19.10. Review and comment on new / expanded aquaculture farm proposals within the approved ADZ; and 19.11. Provide updated information to the Consultative Forum for distribution to the public (e.g. farm coordinates, water quality information, and notification of new aquaculture operations).			
20	The AMC organisational structure must make provision for various functions, including: 20.1. Chairperson: Calls and chairs meetings of the AMC;	Compliant	Refer to the Terms of Reference of the AMC (See Appendix H). The activities of the AMC as per the latest meeting minutes suggest compliance.	No immediate action required.
	20.2. Secretariat: Fulfils secretariat functions, including:	Compliant	Refer to the Terms of Reference of the AMC (See Appendix H). The activities of the AMC as per the latest meeting minutes suggest compliance.	No immediate action required.

#	EA Condition	Findings		Recommendation
	20.2.1. Maintenance of member details and arrangement of meetings; 20.2.2. Compiling and distribution of meeting notes; 20.2.3. Distribution of communication aquaculture farmers in the ADZ; 20.2.4. Maintenance of a database of registered (public) stakeholders; 20.2.5. Drafting and distribution of regular (at least quarterly) AMZ Reports to all Consultative Forum members and registered stakeholders on activities in the ADZ; 20.2.6. Administration of and responding to stakeholder comments on aquaculture activities in the ADZ; and 20.2.7. Reporting on stakeholder aspects at AMC meetings			
	20.3. Environmental Representative: Fulfills environmental control functions, including: 20.3.1. Liaising with the suitably qualified service provider(s) appointed to attend to environmental sampling, monitoring and	Compliant	Refer to the Terms of Reference of the AMC (See Appendix H). The activities of the AMC as per the latest meeting minutes suggest compliance.	No immediate action required.

#	EA Condition	Findings		Recommendation
	auditing implemented as per the requirements; 20.3.2. Receiving and reviewing monthly Farm Monitoring Reports; 20.3.3. Receiving and reviewing environmental sampling, monitoring and audit results; 20.3.4. Notifying the Chairperson in the event any aspects require immediate attention of the AMC; 20.3.5. Notifying the Secretariat in the event any aspects require immediate attention of other aquaculture farmers in the ADZ; and 20.3.6. Reporting on environmental aspects at AMC meetings.			
Consultative Forum				
21	The holder of the authorisation must invite representatives of other relevant government departments, authorities, relevant local / public interest organisations and ADZ operators to become members of the Consultative Forum, including the following institutions / organisations:	Compliant	An invitation had previously been sent out to all relevant stakeholders and representatives required in Condition 21. Most of the representatives listed currently form part of the CF as can be seen from the meeting minutes provided (See Appendix H).	No immediate action required.

#	EA Condition	Findings		Recommendation
	21.1. Government and authorities: South African National Parks (SANParks); Western Cape Department of Agriculture (DoA); CapeNature; and Saldanha Bay Municipality; 21.2. Aquaculture industry: 21.3. Local industry association representing operators in the ADZ; 21.4. Farmers operating in the ADZ; 21.5. Other organisations: South African National Defence Force (SANDF) / South African Navy (SAN); Saldanha Bay Water Quality Forum Trust (SBWQFT); and Representatives of the local fishing industry.			
22	Forum members will join on a voluntary basis and at no costs to DAFF.	Compliant	Refer to the Terms of Reference for the CF (See Appendix H).	No immediate action required.
23	Key functions of the Consultative Forum are to: 23.1. Review environmental monitoring data related to aquaculture in Saldanha Bay; 23.2. Make recommendations to the AMC based on the outcomes of environmental monitoring; and	Compliant	Refer to the Terms of Reference for the CF (See Appendix H). The activities of the CF as per the latest meeting minutes suggest compliance.	No immediate action required.

#	EA Condition	Findings		Recommendation
	23.3. Provide a platform for discussion of environmental management in the ADZ and advise the AMC on ADZ Management,			
Frequency and process of updating the EMPr				
24	The EMPr must be updated where the findings of the environmental audit reports, contemplated in Condition 29 below, indicate insufficient mitigation of environmental impacts associated with the undertaking of the activity, or insufficient levels of compliance with the environmental authorisation or EMPr.	Compliant	The EMPr has undergone three (3) amendments previously. There have been no recent amendments to the EMPr in the last 3 years. There is no evidence that mitigation of environmental impacts has been insufficient for this audit report.	No immediate action required.
25	The updated EMPr must contain recommendations to rectify the shortcomings identified in the environmental audit report,	Information	See finding for Condition 24 above.	No immediate action required.
26	The updated EMPr must be submitted to the Department for approval together with the environmental audit report, as per Regulation 34 of GN R. 982, The updated EMPr must have been subjected to a public participation process, which process has been agreed to by the Department, prior to submission of the updated EMPr to the Department for approval.	Information	See finding for Condition 24 above.	No immediate action required.

#	EA Condition	Findings		Recommendation
27	In assessing whether to grant approval of an EMPr which has been updated as a result of an audit, the Department will consider the processes prescribed in Regulation 35 of GN R.982. Prior to approving an amended EMPr, the Department may request such amendments to the EMPr as it deems appropriate to ensure that the EMPT sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.	Information	See finding for Condition 24 above.	No immediate action required.
28	The holder of the authorisation may apply for an amendment of an EMPT, if such amendment is required before an audit is required. In assessing whether to grant such approval or not, the Department will consider the processes and requirements prescribed in Regulation 37 of GN R. 982.	Information	See finding for Condition 24 above.	No immediate action required.
Monitoring				
29	The holder of the authorisation must appoint a suitably qualified and experienced independent Environmental! Control Officer (ECO) for the construction phase and operational phase of the development that will have the responsibility to ensure that	Compliant	NCC Environmental Services (Pty) Ltd have been appointed to provide ECO monitoring services for a 6-month period from 07 October 2025 to 06 February 2026. Michelle Lee is currently the ECO monitoring compliance on site.	Holder – Ensure the following ECO is appointed timeously.

#	EA Condition	Findings		Recommendation
	the mitigation/rehabilitation measures and recommendations referred to in this authorisation are implemented and to ensure compliance with the provisions of the EMPr.			
29.1	The ECO must be appointed before commencement of any authorised activities.	Partial compliance	There were a few months in the 2025 year when no ECO was appointed to monitor compliance with the EA and EMPr according to the currently appointed ECO. NCC Environmental Services have since been appointed to monitor compliance.	Holder – Ensure an ECO is appointed timeously to take over the monitoring as soon as the previous ECO's contract comes to an end.
29.2	Once appointed, the name and contact details of the ECO must be submitted to the Director: Compliance Monitoring of the Department.	Compliant	The ECO's name and contact details is included in the monthly ECO monitoring reports which are sent to the Director: Compliance Monitoring monthly.	No immediate action required.
29.3	The ECO must keep record of all activities on site, problems identified, transgressions noted and a schedule of tasks undertaken by the ECO.	Compliant	The ECO's monthly monitoring reports include all the requirements of Condition 29.3 (See Appendix F).	No immediate action required.
29.4	All monitoring studies conducted/commissioned by the Department of Agriculture, Forestry and Fisheries within Saldanha Bay must be reviewed by an independent specialist to verify findings before the report is submitted to the AMC.	Non-compliant	No evidence to suggest that monitoring studies done by appointed specialists have been reviewed by independent specialists to verify the findings before being sent to the AMC.	Holder – Ensure independent specialists are appointed to review and verify the findings of monitoring studies conducted by specialists.

#	EA Condition	Findings		Recommendation
				It is recommended that the Holder set-up and maintain a database of monitoring studies conducted/commissioned, indicating inter alia whether these have been reviewed by appropriately qualified specialists and then submitted to the AMC.
29.5	Individual operators must ensure that daily monitoring is undertaken. Findings of the daily monitoring must be verified and signed off by the ECO on a monthly basis and be reflected in the monthly ECO reports, which must be presented by the ECO to the AMC at the bi-monthly meetings.	Compliant	Monthly ECO monitoring reports have been compiled and are an agenda item on each AMC meeting where the report is presented by the ECO.	No immediate action required.
29.6	The ECO must also submit a detailed monitoring report to the Directorate: Compliance Monitoring on a monthly basis. A summarised version of this report must also be made available to all AMC members on a monthly basis.	Compliant	Monthly ECO monitoring reports are submitted to the Directorate: Compliance Monitoring on a monthly basis. Summarised monthly reports are uploaded to the internal ADZ portal and members of the AMC are notified monthly of the upload. The summarised version of the report is then presented by the ECO at the bi-monthly meetings to the AMC.	No immediate action required.
Recording and reporting to the Department				

#	EA Condition	Findings		Recommendation
30	All documentation e.g. audit monitoring/compliance reports and notifications, required to be submitted to the Department in terms of this environmental authorisation, must be submitted to the Director: Compliance Monitoring of the Department at Directorcompliance@environment.gov.za.	Compliant	All documentation required as per Condition 30 have been submitted to the Compliance Directorate for this reporting period (See Appendix H). For the most part documentation is loaded onto the portal, and the Department is afforded access via permitted access to the portal.	No immediate action required.
31	The holder of the environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid, ensure that project compliance with the conditions of the environmental authorisation and the EMPr are audited, and that the audit reports are submitted to the Director: Compliance Monitoring of the Department at Directorcompliance@environment.gov.za.	Compliant	External Regulation 34 Audits have been conducted annually for the past 6 years; the first External Regulation 34 Audit being undertaken in January 2020. Previous audit reports have been submitted to the Compliance Directorate (See Appendix H).	No immediate action required.
32	Auditing and of submission of the environmental audit reports must be undertaken annually, conducted over the period of five (5) consecutive years, after which the audit frequency can be reviewed based on the audit findings, taking into account the processes for such auditing as prescribed in Regulation 34 of GN R. 982	Compliant	External Regulation 34 Audits have been conducted annually for the past 6 years; the first External Regulation 34 Audit being undertaken in January 2020. Previous audit reports have been submitted to the Compliance Directorate.	No immediate action required.

#	EA Condition	Findings		Recommendation
33	The holder of the authorisation must, in addition, submit an environmental audit report to the Department within 30 days of completion of the installation of the infrastructure of the last aquaculture farm to be established within the ADZ.	Not audited	According to the currently appointed ECO, there is still room for more operators to install aqua culture farms. Therefore, this condition will only be applicable once the final aqua culture farm has been established within the ADZ.	No immediate action required.
34	The environmental audit reports must be compiled in accordance with Appendix 7 of the EIA Regulations, 2014 and must indicate the date of the audit, the name of the auditor and the outcome of the audit in terms of compliance with the environmental authorisation conditions as well as the requirements of the approved EMPr.	Compliant	The requirements of Appendix 7 have been taken into consideration in this environmental audit report (see legal requirements for environmental audits as described in checklist on Page 8 and 9).	No immediate action required.
35	Records relating to monitoring and auditing must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	Partial compliance	For the most part documentation is loaded onto the EDMS portal, and the Department is afforded access via permitted access however no hard copy or e-copy of the Regulation 34 Audit reports were available for inspection during the auditors site inspection.	Holder – Ensure a central location in Saldanha keeps records of all ECO monitoring reports and Regulation 34 Audit Reports ready for inspection by the Department or an Auditor.
Notification to authorities				
36	A written notification of commencement must be given to the Department no later than fourteen (14) days prior to the	Compliant	The holder gave notice to the competent authority of the commencement of construction on 9 November 2018 and again on 4 April 2019	No immediate action required.

#	EA Condition	Findings		Recommendation
	commencement of the activity. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence, as well as a reference number.		due to a delay in commencement. The notice issued was compliant with Condition 36.	
Operation of the activity				
37	A written notification of operation must be given to the Department no later than fourteen (14) days prior to the commencement of the activity operational phase.	Compliance	Blue Sapphire Pearls send emailed notification to the competent authority on 24 January 2019 of its intention to commence with operations on 11 February 2019.	No immediate action required.
Site closure and decommissioning				
38	Should the activity ever cease or become redundant, the holder of the authorisation must undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time.	Not audited	The ADZ is still fully operational. Fourteen (14) Marine Aquaculture Right Holders operating within the Saldanha Bay Aquaculture Development Zone (ADZ) were found to be non-compliant with the conditions of their permits issued in terms of Section 13 of the Marine Living Resources Act, 1998 (MLRA), and/or have failed to effectively utilise their allocated Rights. Following a review of the matter, the Director-General of the DFFE has decided to cancel thirteen (13) Marine Aquaculture Rights in terms of Section 28(3)(c) of the MLRA. The exception is Pluto Mussels and Trading (Pty) Ltd, who	Lagoon Aqua – Provide the ECO with a decommissioning plan.

#	EA Condition	Findings		Recommendation
			submitted adequate representation demonstrating why their Right should not be cancelled or revoked. According to the currently appointed ECO, Lagoon Aquaculture have also removed all of their equipment from the ADZ and have not provided the Department, ECO or AMC with a decommissioning plan as yet.	
Specific Conditions				
39	An integrated waste management approach must be implemented that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste must be disposed of at a landfill licensed in terms of section 20 (b) of the National Environment Management Waste Act, 2008 (Act No.59 of 2008).	Compliant	While it seems that most operators are disposing of their waste at the local landfill site, the landfill site does not provide safety disposal slips. The Auditor inspected the temporary waste storage area of Ocean Grown Aquacultures, and all waste was neatly stored and separated for disposal/recycling. All waste disposal records are provided in the monthly Farm Monitoring Reports done by each individual operator (See Appendix H). There are some reports of operators recycling and reusing some of their waste, such as crushing the oyster shells and using them in fishtank filter systems, crushing the shell waste and reusing them in fill material for the construction of roads, these records have been mentioned in the operators Farm Monitoring	Holder – Request signed letters from the recycling companies confirming that waste material is collected monthly for crushing and recycling/reuse purposes. The letters should detail the type of waste material and the method of reuse.

#	EA Condition	Findings		Recommendation
			Reports however no evidence was provided to the Auditor to verify this reuse.	
40	No new mooring blocks must be placed within a 200m of the Merestein site (33.087355°, 17.955044°E - WGS84, Decimal Degrees)	Compliant	New and proposed farms may only be located within the authorised ADZ area. The Merestein site lies outside of the approved ADZ area and therefore compliance with Condition 4 of the environmental authorisation will ensure compliance with this condition. Although the currently appointed ECO confirmed that no new mooring blocks have been recently installed.	No immediate action required.
41	A detailed anchor distribution plan must be provided to the Maritime and Underwater Cultural Heritage Unit at SAHRA once this has been finalised. This plan can be used to reassess potential shipwreck impacts or assist developers in determining whether to amend placement plans to avoid incurring further heritage intervention costs.	Compliant	A detailed anchor distribution plan with coordinates has been submitted to SAHRA and they confirmed that no shipwrecks would be impacted (See Appendix H).	No immediate action required.
42	Diver surveys must be completed during the activities required for setting anchor arrays. Commercial divers working on the project must be provided with brief orientation training. If wreck material is identified, archaeologists must be contracted to make an assessment.	Not audited	No records of diver orientation training were provided to the Auditor. The ECO informed the Auditor that training is done in house, and the Operators have records of training. No shipwreck material has been discovered for this reporting period.	Holder – Obtain dive surveys and records of orientation training from the relevant Operators/Service Providers.

#	EA Condition	Findings		Recommendation
43	The location and nature of any identified maritime and underwater cultural heritage resource must be provided to a maritime archaeologist and to the South African Heritage Resources Agency for inclusion on their Shipwreck Database.	Not audited	No underwater cultural heritage resources identified to date. Note that all known wreck sites were avoided in determining the ADZ area so it is unlikely that other maritime and underwater cultural heritage resources will be identified in future.	No immediate action required.
44	Should evidence of archaeological material be identified, the Maritime and Underwater Cultural Heritage Unit at SAHRA must be notified and an archaeologist must assess the findings.	Not audited	See finding for Condition 43 above.	No immediate action required.
45	Should any wreck site, or part thereof, or object or artefacts from a wreck site be disturbed during operations, a permit from SAHRA must be acquired prior to continuing with activities.	Not audited	See finding for Condition 43 above.	No immediate action required.
46	Benthic Mapping / survey of the area under individual farms must be undertaken by prospective operators before the commencement of the operational phase in order to establish baseline conditions for monitoring purposes.	Compliant	According to the first External Regulation 34 Audit Report, baseline samples were collected by CapMarine for all ADZ sites on behalf of the industry.	No immediate action required.
47	Monitoring points must be established before the commencement of farming activities on each site in order to measure pre-farming baseline conditions with	Compliant	According to the first External Regulation 34 Audit Report, a sampling plan was prepared by an independent specialist and finalized on 4 December 2018.	No immediate action required.

#	EA Condition	Findings		Recommendation
	observed conditions during the operational phase. The number and placement of these monitoring points, and the parameters measured, must be appropriate to the mariculture activity type (and its by-products) at that site, the benthic habitat at that site, as well as the prevailing environmental conditions (such as the dominant current directions). The information gathered from monitoring points must be used to guide the phased development of each site.			
48	Predictive dispersion models must be developed within 2 years of new aquaculture activities commencing and these must be used together with monitoring and other information to inform the continuous management of the Saldanha Aquaculture Development Zone.	Compliant	According to the first External Regulation 34 Audit Report, a dispersion model was developed for the ADZ by PRDW. The ECO confirmed that quarterly monitoring programmes undertaken by Anchor Environmental are part of the follow up dispersion monitoring required. Currently no finfish operations are underway in the ADZ therefore updates to the dispersion model are not applicable.	No immediate action required.
ADZ phasing-in of aquaculture expansion				
49	The holder of the authorisation must limit annual ungraded shellfish production to 10 000 tpa for the first two years, increasing thereafter annually by up to 5 000 tpa, only if	Compliant	All ungraded bivalve production from the Saldanha Bay ADZ is under the 10 000 tpa threshold given in condition 49 as per the latest summary report of the currently appointed ECO	No immediate action required.

#	EA Condition	Findings		Recommendation
	monitoring results indicate that environment health has been maintained and impacts remain manageable, to a maximum of 27 600 tpa ungraded production.		and the Farm Monitoring Reports submitted by the individual operators (See Appendix H).	
50	The holder of the authorisation must implement a phased approach for the development of finfish cage culture in the ADZ by: 50.1. Limiting annual increases in finfish production to no more than 1 000 tpa to a maximum of 5 000 tpa achieved over a 5-year period, only if monitoring results indicate that environment health has been maintained and impacts remain manageable. 50.2. Splitting the recommended annual increase in production between Big Bay and Outer Bay.	Not audited	Finfish production is not currently underway within the ADZ.	No immediate action required.
51	Finfish production beyond 5 000 tpa, to @ maximum of 10 000 tpa, must only be pursued if: 51.1. Ecological monitoring indicates that production of 5 000 tpa has no adverse ecological effects, and there is adequate	Not audited	Finfish production is not currently underway within the ADZ.	No immediate action required.

#	EA Condition	Findings		Recommendation
	information to permit further expansion in fish production; 51.2. Intensified monitoring is applied (a detailed monitoring plan to be implemented) and that expanded production can only occur by following a more precautionary ramp up approach (where the expanded production is phased in over at least a five-year period, provided ongoing monitoring has indicated that resource quality objectives are maintained); and 51.3. In the ramp up period, and for any production beyond five years, a further period of strict monitoring and environmental quality standards is introduced. Should standards or precautionary limits be approached or exceeded, sampling and monitoring plans must include a response procedure that leads to appropriate downward adjustments of fish production.			
52	“These detailed monitoring plans, for intensified monitoring in the expanded finfish production scenario (i.e. finfish production beyond 5 000 tpa, to a maximum	Not audited	Finfish production is not currently underway within the ADZ.	No immediate action required.

#	EA Condition	Findings		Recommendation
	of 10 000 tpa), must be submitted to the Department for approval, prior to this expansion in finfish production commencing”.			
53	The holder of the authorisation must ensure that the findings of the dispersion modelling inform the site specific EMPs (to be compiled individual operators), Sampling Plan, ADZ layout and expansion.	Compliant	According to the first External Regulation 34 Audit Report undertaken, the following was recorded: “Dispersion Modelling was undertaken by PRDW. The Dispersion Model has informed the Sampling Plan as it is referenced in the Plan. In approving the site specific EMPs the ADZ has taken cognizance of the findings of the Dispersion Modelling.” The above comment from the first audit report therefore suggests compliance.	No immediate action required.
54	Environmental monitoring must be implemented to inform management and expansion of operations as part of the phased approach.	Compliant	It is unclear as to what “environmental monitoring” condition 54 is referring to. Currently there is an ECO appointed to monitor the ADZ’s compliance with the EA and EMPr. Chemical surveying is currently being undertaken between 2025 – 2027. A reef survey was also recently conducted in January 2026.	No immediate action required.
General				

#	EA Condition	Findings		Recommendation
55	A copy of this environmental authorisation, the audit and compliance monitoring reports, and the approved EMPr, must be made available for inspection and copying- 55.1. at the Chief Fisheries Compliance Monitoring Office located in Pepper Bay Harbour Saldanha Bay, as well as at the onshore office of each operator within the ADZ, 55.2. to anyone on request; and 55.3. where the holder of the environmental authorisation has a website, on such publicly accessible website.	Partial compliance	During the audit inspection, the Auditor visited the Ocean Grown Aquaculture land-based offices. An electronic copy of the EA and Operator specific EMPr was available during the inspection. No copy of the approved EMPr was available for viewing. 55.1. The Auditor is unsure whether copies of the EA, EMPr and compliance monitoring reports are available at the Chief Fisheries Compliance Monitoring Office located in Pepper Bay Harbour Saldanha Bay, due to no staff being available during the audit inspection. The Holder has sent photographic evidence of the relevant documents on site, after the site inspection of the Auditor was conducted. 55.2. As per above. 55.3. The ECO informed the Auditor that the journal is available on the internal ADZ Electronic Document Management System (EDMS) and anyone with a password is able to access it. However as far as the Auditor is aware, a copy of the document has not been placed on a publicly accessible website.	Holder – Ensure a copy of the EA's, approved EMPr, audit and compliance monitoring reports are available for inspection and copying, at the Chief Fisheries Compliance Monitoring Office located in Pepper Bay Harbour Saldanha Bay, to anyone on request; and on a publicly accessible website.
56	National government, provincial government, local authorities or committees appointed in terms of the	Information	Holder to take note of this condition.	No immediate action required.

#	EA Condition	Findings		Recommendation
	conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his/her successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.			

5.2. Compliance with the EMPr

Table 3: Audit of Compliance with Section 5.1 Operational Phase – ADZ-level management and mitigation measures

ID	EMPr Outcomes		Findings	Recommendation
Demarcation of ADZ precincts				
1.	Ensure that all active aquaculture farms are accurately marked on navigational charts.	Compliant	All aquaculture farms are accurately marked on navigational charts (See Appendix H).	No immediate action required.
2.	Ensure that the outside boundaries of all active aquaculture areas are accurately marked day and night using markers compliant with South African Marine Safety Authority (SAMSA) regulations.	Non-compliant	Outside boundaries of the active aquaculture areas were not accurately marked day or night with markers compliant with South African Marine Safety Authority (SAMSA) regulations. The latest ECO monitoring report mentions that “ongoing incidents of toplines being cut and rafts being damaged have been noted in previous monitoring reports as a result of the active aquaculture farms not being marked accordingly.” The ECO informed the Auditor that Transnet Ports Authority (TNPA) are in the process of developing an Aids to Navigation (AtoN) Plan however this seems to have been ongoing for the	Holder – Ensure the outside boundaries of the active aquaculture farms are marked with markers compliant with South African Marine Safety Authority (SAMSA) regulations. If this is still not possible then the Holder should apply for an amendment to the Condition of the EA to make it something more suitable and specific to conditions of the site.

ID	EMPr Outcomes		Findings	Recommendation
			past couple of years with no real results or progress being achieved. Further correspondence with the ECO and the Applicant confirms that monthly efforts are implemented to request information and action from the TNPA but no response has been received. Further evidence of discussion and efforts made to correct the non-compliance was also documented in AMC Meeting Minutes (See Appendix H).	
3.	Monitor that markers are fully functional.	Not audited	No marker buoys for the ADZ area were observed during the audit inspection.	No immediate action required.
4.	If the Ports Authority requires flashing lights, ensure the lights flash simultaneously.	Not audited	According to the ECO this is not required from the Ports Authority at this stage.	No immediate action required.
5.	Do not restrict access to fishing rights areas where practically possible.	Compliant	No non-compliance was observed or has been reported to the ECO and Auditor.	No immediate action required.
Supervision of farming activities				
6.	Enforce maintenance and operational guidelines and standards in relation to potential entanglement risks at farms, including loose ropes, lines, buoys or floats.	Compliant	Maintenance of the aqua culture farms is the responsibility of the individual farm operators. All farms	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			seemed to be relatively well maintained during the audit inspection. A loose rope was observed at line “A” of the Blue Sapphire Pearls aquaculture farm in Small Bay during the on-water inspection. All maintenance of farms is recorded in the Operator’s individual Farm Monitoring Reports (See Appendix H). The comment from the ECO in the latest ECO monitoring report suggests compliance.	
7.	Implement monitoring as per the environmental monitoring requirements stipulated in Section 7 of the EMPr.	Compliant	The monitoring tables in Section 7 of the EMPr are audited in the tables below in this report. The Auditor has received evidence of reef survey monitoring and benthic chemical monitoring that has been undertaken in the past year.	No immediate action required.
8.	Update the dispersion model with monitoring information as it becomes available to inform further monitoring and the phased implementation of the ADZ.	Not audited	No finfish farming is currently underway in the ADZ. The water nutrient data for updating of the dispersion model is collected by Anchor Environmental and is reported on in their annual/quarterly reports.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			The dispersion model has not been updated.	
Stakeholder communication				
9.	Notify registered stakeholders of new farms commences. Provide detail on the proposed farm type and location.	Not audited	No new farms have been recently established according to the ECO.	No immediate action required.
10.	Make available ADZ Report updates to all registered stakeholders on aspects relating to the ADZ, including: - Location of existing and planned aquaculture farms; - Results of environmental monitoring in the reporting period; - Any other relevant aspects.	Compliant	ADZ reporting updates are given to stakeholders through the following methods: • Bi-monthly updates through the ECO at the AMC meetings (See Appendix H). • Quaterly updates through the ECO at the CF meetings (See Appendix H). • Annual External Regulation 34 Audits are sent to all stakeholders. • Monthly ECO Reports are uploaded onto the EDMS online portal.	No immediate action required.
Complaints Register				
6.	Maintain and disclose a complaints / comments register. The register must record:	Partial compliance	Any complaints received are captured by the ECO and provided to	Holder – Ensure the ECO maintains a separate complaints register that includes all the

ID	EMPr Outcomes		Findings	Recommendation
	- Name and contact details of person complaining / commenting; - Date submission was lodged; - Person who initially received the submission; - Nature of the submission; - Operator that is subject to the submission; - Actions taken to investigate a complaint and outcome of the investigation; - Action taken to remedy the situation; and - Date on which feedback was provided to the complainant.		the relevant stakeholders according to the latest ECO monitoring report. No official complaints register was available or being maintained with all the relevant data required as per the relevant EA Condition.	information required as per the relevant EA Condition.
Response to environmental incident				
11.	Record all environmental incidents related to aquaculture farm operations, including: - Loose / drifting equipment; - Accidents (collisions) with other water users; - Entanglement of marine animals; - Loss of stock; and - Disease outbreak or algal bloom. - Spill of pollutants; and - Waste in the marine environment.	Compliant	All incidents are reported by Operators to the ECO, and the ECO summarizes all incidents in the monthly ECO Monitoring Reports (See Appendix F). A loose rope was observed during the Auditor's on-water inspection at Blue Ocean Sapphire's farm. The ECO recorded the incident. A loose chain from the Aqua Foods farm was reported by the boat	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			Captain to the ECO and Auditor during the on-water inspection. The ECO recorded the incident.	
12.	Coordinate a response to environmental incidents related to aquaculture operations, if necessary.	Compliant	All incidents are reported to the ECO which then will coordinate the necessary response to handle and close out the incident. Some minor incidents of loose and broken moorings still need to be closed out according to the ECO.	Holder – Ensure all previous recorded incidents are closed out with the ECO.
13.	Activate the emergency response protocol to respond to an environmental incident if it cannot be dealt with at farm level.	Compliant	According to the ECO there is an emergency response protocol and responders in place in case of an environmental emergency. No environmental incidents that were classified as emergencies had taken place in the reporting period therefore this item is compliant by absence of action.	No immediate action required.
Sector development				
14.	Liaise with relevant authorities to encourage the development of South African spat and fingerling hatcheries to reduce the reliance on import, and associated risk of non-intentional introduction of associated alien species and diseases.	Compliant	According to the ECO, the DFFE: Fisheries Management Branch liaise with the relevant authorities to encourage the development of South African spat and fingerling hatcheries. Therefore, Oyster	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			hatcheries in Paternoster and Kleinsee in South Africa are primarily used to purchase oyster spat from. Mussel spats are collected in Saldanha Bay on settlement ropes and then reseeded to grow out.	
15.	Encourage the municipality, in cooperation with aquaculture operators and the AMC, to initiate a study to identify industries or projects that could benefit from the direct and indirect opportunities generated by the ADZ, and mechanisms to promote or establish such industries or projects.	Compliant	According to the ECO, “the Department has initiated and secured support for several programmes that directly promote community participation and socio-economic inclusion in the Saldanha Bay area. Through the proposed GEF Catalyst South African Project, the Department has developed a five-year programme focused on sustainable aquaculture development with specific emphasis on supporting women, youth, vulnerable groups and local communities through training, incubation, mentorship, entrepreneurship development and community-based aquaculture clusters. The programme specifically identifies the Saldanha Bay	No immediate action required.

ID	EMPr Outcomes	Findings	Recommendation
		Aquaculture Development Zone as a beneficiary site and includes support for small-scale fishers and coastal communities to participate in kelp aquaculture activities. The GEF-8 Food Systems Integrated Programme, implemented through FAO and DFFE, seeks to promote inclusive aquaculture value chains, improve access to production opportunities, develop incubation models for small-scale producers, and support women, youth and marginalised groups within the aquaculture sector. In addition, the UNDP-supported aquaculture development initiatives complement these interventions by focusing on community empowerment, local enterprise development, livelihood creation, capacity building and expanded participation of historically disadvantaged communities in the oceans economy. The UNDP interventions are aligned with DFFE's transformation and inclusive growth	

ID	EMPr Outcomes	Findings		Recommendation
			objectives, and collectively contribute to meeting the intent of Condition 15.” Please refer to Appendix H for evidence submitted, confirming the various programmes being undertaken.	
16.	Encourage the municipality, in cooperation with aquaculture operators and the AMC, to encourage and support projects and / or networks that provide training and support for small and medium enterprises in the Saldanha Bay Municipality to benefit from the opportunities generated by the ADZ.	Compliant	According to the ECO, “The submitted evidence demonstrates that significant measures are being implemented to ensure that local communities derive direct socio-economic benefits from aquaculture development activities within Saldanha Bay. The GEF project is specifically designed to establish sustainable aquaculture value chains that contribute towards employment creation, food security, income generation, economic development and entrepreneurship opportunities. The project includes expansion of kelp production, development of hatchery infrastructure, training programmes, enterprise incubation and value-addition opportunities that are intended to create new economic	No immediate action required.

ID	EMPr Outcomes	Findings	Recommendation
		opportunities for local communities and small-scale producers. The Saldanha Bay component of the project specifically identifies small-scale fishers, coastal communities and new entrants as target beneficiaries. Activities include the provision of seed supply, technical support, mentorship, training and knowledge transfer to facilitate participation in the emerging kelp farming industry. The project also seeks to increase the number of beneficiaries through commercial expansion of the sector and development of local supply chains. The GEF-8 Programme further promotes long-term investment into sustainable aquaculture systems and inclusive value chains, with dedicated outputs focused on small-scale producer financing, incubation, technology transfer and support for women, youth and marginalised groups.	

ID	EMPr Outcomes	Findings		Recommendation
			Collectively, the GEF/FAO and UNDP-supported interventions provide evidence that DFFE has established a clear pathway for local economic development, job creation, skills development and community beneficiation in Saldanha Bay, thereby addressing the requirements of Condition 16.” Please refer to Appendix H for evidence submitted, confirming the various enterprises and stakeholders benefitting from the Saldanha Bay Aquaculture Development Zone.	
Auditing				
17.	Condition 32 of the EA stipulates that: The frequency of auditing and of submission of the environmental audit reports must be as per the frequency indicated in the EMPr, taking into account the processes for such auditing as prescribed in Regulation 34 of GN R. 982. This condition was amended in the (Sept 2020 Amended EA) to read: Auditing and submission of the environmental audit reports must be undertaken annually, conducted over the period of five (5) consecutive years, after which the audit frequency can be reviewed based on the audit findings, taking	Compliant	Annual External Regulation 34 Audits have been undertaken consecutively since 2020. This Regulation 34 Audit Report is the 7 th consecutive audit report.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
	account the processes for such auditing as prescribed in Regulation 34 of GNR.982.			

Table 4: Audit of Compliance with Section 5.2 Operational Phase – Farm-level management and mitigation measures

ID	EMPr Outcomes		Findings	Recommendation
Bio-fouling				
1.	Undertake routine surveillance for indications of non-native fouling species on and around marine farm structures and associated vessels and infrastructure.	Compliant	Individual farm operators undertake daily monitoring during routine harvesting and maintenance operations for non-native fouling species and these are reported on in their farm monitoring plans/reports (See Appendix H).	No immediate action required.
2.	Maintain effective antifouling coatings and monitor for fouling.	Not Audited	No antifouling coatings are used on the mussel and oyster aquafarms, and no finfish are currently being farmed in the ADZ. Therefore, this requirement is not applicable. Fouling on the mussel longlines and oyster farms is monitored by individual farm operators through daily visual inspections during routine maintenance and harvesting operations. The ECO also inspects fouling during site inspections.	No immediate action required.
3.	Clean structures and hulls regularly to ensure eradication of pests before they become established.	Compliant	Cleaning of structures and hulls is done regularly by individual farm operators during routine harvesting and maintenance operations. This is reported on in the Farm Monitoring	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
			Reports (See Appendix H). The Auditor also observed an operator removing fouling on buoys and cages during the on-water inspection (See Appendix E).	
4.	Avoid using chemicals for the cleaning of cage nets. It is recommended that high-pressure water hoses and drying or sunning be used to clean cage nets of algae and debris.	Not audited	No finfish were being farmed in the ADZ at the time of the audit. Therefore, no cage nets were being used. Therefore, no chemicals for the cleaning of cage nets were being used or observed.	No immediate action required.
5.	Minimise the impact of bio-fouling organisms by using smooth, plastic coated, knotless mesh on nets, or copper-alloy mesh.	Not audited	Nets are associated with finfish farming. Currently there are no finfish being farmed in the ADZ.	No immediate action required.
6.	Do not use of antifouling products based on heavy metals.	Not audited	No finfish were being farmed in the ADZ at the time of the audit. Therefore, no antifouling products were being used.	No immediate action required.
7.	Use only prescribed veterinary chemicals and antifoulants.	Not audited	Currently no antifouling products are being used in the ADZ.	No immediate action required.
8.	Establish and adhere to guidelines around the use of anti-fouling products in the mariculture industry.	Not audited	Currently no antifouling products are being used in the ADZ.	No immediate action required.
9.	Do not apply antifoulants on site and use environmentally friendly alternatives where effective.	Not audited	Currently no antifouling products are being used in the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
10.	Ensure that veterinarian protocols to eliminate any pests, parasites and diseases are strictly adhered to.	Not audited	The Auditor is unsure if this condition is being implemented.	No immediate action required.
11.	Obtain health certificates for any new batches of fry / finfish introduced into the bay (finfish and oysters).	Compliant	Health certificates for new batches of fry have been obtained and were provided to the Auditor (See Appendix H).	No immediate action required.
Biosecurity				
12.	Ensure that a high level of biosecurity management and planning is in place to limit the introduction of pests and diseases and to be able to respond quickly and effectively should biosecurity risks be identified. Comply with procedures prescribed by the DFFE Aquatic Animal Health Plans. Key components to biosecurity management include: • Prevention of incursions, focussing on the management of: - High-risk pathways (including international source regions); - New pathways; and - Regional sources known to be infected by recognised high-risk pests; • Surveillance (detection), focussing on: - Passive surveillance (screening at airports and ports)	Not audited	According to the ECO the requirement relates to animal health and biosecurity associated with finfish operations, which is currently not taking place within the ADZ. Therefore, this requirement is not applicable to the current operations within the ADZ. Full PPE was being worn in the factories inspected during the audit (See Appendix E).	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
	- Routine surveillance (undertaken on and around marine farm structures and associated vessels and infrastructure by farm operators); and - Targeted surveillance of high-risk areas; and • Control of populations and outbreaks through coordination with, and support from: - All marine stakeholders whose activities can spread unwanted organisms; and - Agencies at local, regional and national scales. Eradication measures and / or application of therapeutants (pharmaceutical products, or ‘medicines’) are only advised if the risk of re-invasion can be managed and pests can be detected before they become widespread.			
Maintenance of aquaculture infrastructure				
13.	Maintain all project infrastructure in good working order. Operators are required to maintain documented records of inspections and maintenance.	Compliant	Most of the operator’s aquaculture infrastructure seemed to be in good working order during the Auditor’s on-water inspection. Operators document maintenance activities within their Farm Monitoring Reports.	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
14.	Regularly clean cages, rafts etc and inspect for alien species. Operators are required to maintain documented records of inspections and maintenance.	Compliant	Cages and rafts are cleaned regularly during routine maintenance and harvesting operations. No alien species have been recorded or observed by the operators. Inspections and maintenance are documented in the Farm Monitoring Reports and daily observation checklists done by farm operators (See Appendix H).	No immediate action required.
15.	Regularly inspect aquaculture infrastructure for integrity of the structure, anchorage and general wear and tear. Operators are required to maintain documented records of inspections and maintenance.	Compliant	Inspections and maintenance are documented in the Farm Monitoring Reports and daily observation checklists done by farm operators (See Appendix H).	No immediate action required.
16.	Keep all lines taught through regular inspections and maintenance. Operators are required to maintain documented records of inspections and maintenance.	Partial compliance	Most of the lines audited during the on-water inspection were taught (See Appendix E), this compliance is further evident from the latest ECO Monitoring Reports (See Appendix F) however the lines from Pluto Trading were tangled. The ECO informed the Auditor that Pluto Trading is a Spat Farm Operator, and their lines are a lot lighter than those used on production farms. They are also	Holder – Ensure Pluto Trading make all their lines taught and further secure the lines to prevent entanglement.

ID	EMPr Outcomes		Findings	Recommendation
			placed perpendicular to the prevailing swell. Inspections and maintenance are documented in the Farm Monitoring Reports and daily observation checklists done by farm operators (See Appendix H).	
17.	Leave mooring anchors or blocks in place when undertaking cage or raft maintenance or fallowing sites to avoid repetitive impacts on the seabed. Operators are required to maintain documented records of inspections and maintenance.	Compliant	According to the ECO Monitoring Reports, mooring blocks/anchors are left in place during maintenance. The ECO Monitoring Reports therefore suggest compliance.	No immediate action required.
18.	Keep marine structures clean and free of unnecessary equipment. Operators are required to maintain documented records of inspections and maintenance.	Compliant	No unnecessary equipment was observed on the marine structures and boats during the on-water inspection (See Appendix E). All inspections and maintenance undertaken is documented.	No immediate action required.
19.	Maintain service barges and boats to withstand local weather conditions and fit them with the necessary safety equipment to provide a safe working environment. Operators are required to maintain documented records of inspections and maintenance.	Compliant	Service barges and boats seemed to be well maintained. The necessary safety equipment was also observed on the boats (See Appendix E). All inspections and maintenance undertaken is documented.	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
Vessel operation				
20.	Implement maritime safety protocols while working on vessels and at sea.	Compliant	No issues were noted during the on-water inspection or have been reported in the ECO Monitoring Reports.	No immediate action required.
21.	Minimise noise and air emissions from vessels.	Compliant	No issues were noted during the on-water inspection or have been reported in the ECO Monitoring Reports.	No immediate action required.
Safety				
22.	Clearly mark cages and other offshore infrastructure with clear warning markers, bells and radar reflectors to ensure visibility to marine traffic.	Partial compliance	Cages and other offshore infrastructure were not clearly marked for visibility to marine traffic. One of the farms had reflector tape placed on their buoys which seemed to be quite effective (See Appendix E). This requirement appears to contradict other conditions of approval, which require all aquaculture equipment to remain visually unobtrusive. The Holder may wish to consider amending this requirement of the EMPr to better align with the overall	The Holder may wish to consider amending this requirement of the EMPr to better align with the overall objectives of the EMPr and to ensure consistency with the other visual impact mitigation requirements.

ID	EMPr Outcomes		Findings	Recommendation
			objectives of the EMPr and to ensure consistency with the other visual impact mitigation requirements.	
23.	Keep necessary safety equipment (e.g. life rings) on platforms in an accessible position.	Compliant	Life rings were observed on the service boats used (See Appendix E) which seemed to be sufficient due to most farms not having any platforms.	No immediate action required.
Human consumption				
24.	Ensure that products intended for human consumption are of an acceptable quality and comply with health standards for seafood as prescribed by the relevant authorities such as the South African Bureau of Standards (SABS) and DFFE.	Compliant	Frequent biotoxin monitoring is conducted by the farm operators, with reports being analysed by the state veterinarian. The state veterinarian informs the AMC should levels exceed the food safety threshold. An alert was issued on the 15/01/2026 notifying all Small Bay operators that E.Coli mussel samples taken from MSS2 on the 12th of January 2026, exceeded the regulatory limit (See Appendix H). The Inner Bay farms were temporarily closed for harvesting and marketing of bivalves until further notice. The Inner Bay farms	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
			were re-opened on the 19 th of January 2026 again.	
Waste management				
25.	Minimise waste through reducing and re-using material (e.g. packaging).	Compliant	Aquaculture infrastructure washed up on shore is reused as far as possible. The Auditor observed one of the operators repairing damaged buoys to be reused (See Appendix E). Two other operators crush the waste shells and send them off to separate facilities where the crushed material gets reused for fish tank filters and the other for suitable infill material for the construction of roads. No official letters or records are available to verify this. Wood pallets are also reused by all operators (See Appendix E).	Holder – Obtain letters from the operators confirming the reuse of material.
26.	Collect recyclables separately and deliver these to suitable facilities or arrange for collection.	Compliant	Two operators crush the waste shells and send them off to separate facilities where the crushed material gets reused for fish tank filters and the other for suitable infill material for the construction of roads. No	Holder – Obtain signed letters from the Operators and Service Providers confirming the reuse of material.

ID	EMPr Outcomes	Findings		Recommendation
			official letters or records are available to verify this. Wood pallets are also reused by all operators (See Appendix E).	
27.	Collect all waste in bins and/or skips. Prevent littering by staff at work sites by providing bins or waste bags in sufficient locations.	Compliant	No litter or inappropriately stored waste was observed during the on-water inspection. The Auditor inspected one of the operator's waste storage areas during the audit and all waste was stored appropriately within suitable waste bins/bags/skips (See Appendix E).	No immediate action required.
28.	Provide separate bins for hazardous / polluting materials and mark these clearly.	Compliant	Biological waste (Oyster and mussel shells) is stored in a separate area to the domestic and packaging waste as these get crushed first and then removed for reuse. No hazardous waste was observed on site during the audit inspection.	No immediate action required.
29.	Ensure no debris and waste material used at the operations enters the marine environment (particularly plastics), to minimise the risk of attraction, harming and entanglement by seabirds, marine mammals and large predators.	Compliant	No litter or plastics were observed in the marine environmental or at the working areas. No major incidents of waste pollution have been reported or recorded for the reporting period.	Holder – Ensure operators investigate alternative disposal methods for biofouling that is removed.

ID	EMPr Outcomes		Findings	Recommendation
	Organic waste in the form of biofouling removed during harvesting is traditionally discarded overboard. Active investigations to alternative disposal methods must be pursued.		Organic waste from biofouling is discarded overboard currently. According to the ECO, Anchor Environmental are in the process of preparing a biofouling strategy. Once completed, it will be shared with industry stakeholders prior to implementation.	
30.	Do not discard non-organic waste overboard vessels.	Compliant	No litter or plastics were observed in the marine environment or at the working areas. No major incidents of waste pollution have been reported or recorded for the reporting period.	No immediate action required.
31.	In the event of equipment, litter and debris entering the sea, remove these as soon as possible.	Compliant	No equipment, litter or debris was observed in the marine environment during the on-water inspection. Farm operators monitor for equipment, debris and litter in the marine environment daily.	No immediate action required.
32.	Remove debris washed onshore. This should be done / paid for by the operator the debris belongs to (which should be marked).	Compliant	Regular beach clean-ups are conducted by operators (See Appendix H). The Auditor and ECO conducted a beach inspection of the Spreeuwalle beach and observed several buoys and pieces of rope (See Appendix E). All debris was	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			marked with GPS and given to the relevant operators to go clean up.	
33.	Investigate alternative uses for wastes (such as using shell grit for driveway gravel, gardening or chicken farming) prior to disposing to landfill.	Compliant	Two operators crush the waste shells and send them off to separate facilities where the crushed material gets reused for fish tank filters and the other for suitable infill material for the construction of roads. No official letters or records are available to verify this. Wood pallets are also reused by all operators (See Appendix E).	No immediate action required.
Employment				
34.	Procure goods and services from local, provincial or South African suppliers as far as possible, with an emphasis on BBBEE suppliers where possible.	Compliant	Goods and services as far as reasonably possible are procured and supplied locally according to the ECO and operators interviewed during the audit.	No immediate action required.
35.	Procure ancillary services for goods purchased overseas, such as installation, customisation and maintenance, from South African companies as far as possible.	Compliant	As above.	No immediate action required.
36.	Utilise local labour (Saldanha Bay municipality) as much as possible. Where non-local specialist staff is required, implement a training programme to upskill local labour to assume these positions over a period of 5 years.	Compliant	All staff, divers and specialists used by the operators are employed from the local municipality as far as	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
			possible according to the staff interviewed.	
37.	Implement a local recruitment policy, to discourage an uncoordinated influx of outside workers.	Partial compliance	Operators have confirmed that all staff currently employed by them are locally employed. This was verified during an interview with two Captains of the maintenance boats. Most of the Operators have confirmed that no local recruitment policy is currently in place, although most of their staff are local people from the local Municipality.	Holder – Ensure Operators implement a local recruitment policy, to discourage an uncoordinated influx of outside workers.
38.	Collect data on staff numbers, composition and origin and report these to the DFFE.	Partial compliance	According to the ECO Monitoring Reports, staff numbers, composition and origin is recorded in the monthly Farm Monitoring Reports however upon inspection of these reports, it is unclear as to the number of staff, composition or origin of staff on the farms as the data is not being filled in, in the operator's Farm Monitoring Reports. The ECO further mentions that this data is sent annually to the DFFE for economic reporting, ECO Monitoring Reports are also sent monthly to the DFFE.	Holder – Ensure operator's report their staff numbers, composition and origins to the DFFE.

ID	EMPr Outcomes		Findings	Recommendation
Environmental awareness training				
39.	Provide environmental awareness training to all personnel on site at the start of their employment. Training should include discussion of: • Potential impact of waste and farming activities on the environment; • Suitable disposal of waste; • Key measures in the EMPr relevant to worker's activities; • How incidences and suggestions for improvement can be reported. Ensure that all attendees remain for the duration of the training. Operators to keep a record of personnel that received environmental inductions / informal training and include this in the monthly reporting to the ADZ ECO.	Non-compliance	No evidence of inductions or refresher inductions has been received during the audit process. No awareness training or induction data was being filled in the Farm Monitoring Reports.	Holder- Ensure operator's provide environmental induction to all staff prior to commencing with work on site and conduct refresher environmental inductions at the beginning of each year for all staff. Environmental awareness training and induction records should be filled into the Farm Monitoring Reports.
Mussel farm management				
40.	Seed ropes with specimens present in the area and do not introduce mussels from other areas.	Compliant	Mussel spats are collected in Saldanha Bay on settlement ropes and then reseeded to grow out	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			according to the ECO Monitoring Reports.	
41.	Do not dispose of mussels in the Bay during red tides.	Compliant	None observed or reported to the ECO during the auditing period. If there is a HAB event, there are protocols in place to deal with the required actions and additional monitoring.	No immediate action required.
42.	Avoid high density culture (overcrowding). The recommended density is: • One raft of 800 droppers per ha; or • 11 longlines of 832 droppers per ha.	Compliant	No overcrowding was observed during the on-water inspection of the Auditor. Production quantities are included within the monthly Farm Monitoring Reports submitted by the operators to the ECO.	No immediate action required.
Oyster farm management				
43.	Use only spat sourced from bio secure certified hatcheries and/or quarantine facilities.	Compliant	According to the ECO only certified spat is used and introduced into the farming operations within the Saldanha Bay ADZ.	No immediate action required.
44.	Inspect imported spat for other species before introduction into the Bay. Destroy any other species associated with oyster spat and report the incident to the DFFE.	Not audited	None of the spat used for oysters during the auditing period was imported.	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
45.	Avoid high density culture (overcrowding). The recommended density is 11 longlines of 176 oyster stacks / abalone barrels per ha.	Compliant	No overcrowding was observed during the on-water inspection of the Auditor. Production quantities are included within the monthly Farm Monitoring Reports submitted by the operators to the ECO.	No immediate action required.
46.	Do not discard fouling organisms removed from cultured stock taken onshore for maintenance back into the marine environment.	Not audited	No evidence to confirm safe disposal of organisms removed during fouling on shore were provided to the Auditor. No non-compliances were observed during the audit either.	Holder – Obtain evidence of safe disposal of organisms removed during fouling activities on shore.
Finfish farm management - Farm layout and density				
47.	Ensure that finfish cages do not occupy more than 30% of the total area allocated for finfish farming at any one time, both within individual licence areas and overall within the portions of the ADZ identified for finfish culture.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
48.	Rotate cages within a production area to allow recovery of benthos.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
49.	Destock, or fallow, a site after a growing cycle to allow seabed recovery prior to restocking.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Finfish farm management - Feed				
50.	Purchase only registered aquaculture feeds from recognised feed companies that produce high quality	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
	feeds of which the ingredients, composition and manufacturing methods are known.			
51.	Use palatable feeds of the correct pellet or grain size to ensure low levels of feed loss.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
52.	Use high digestibility, high energy and low phosphorus feeds, species and system-specific feeds and maximize food conversion ratios (and minimize waste).	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
53.	Store and use feed on a “first-in-first-out” basis to prevent unnecessary aging and deterioration in quality.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
54.	Ensure that feed storage areas are well ventilated, cool, dry and free of vermin that can damage, contaminate and consume feeds.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
55.	Use feeding regimes that minimise direct feed wastage and excessive faecal and metabolite releases from fish.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
56.	Record feed types and feeding rates daily so that conversion efficiency can be calculated and monitored.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
57.	Monitor and manage feeding regimes to minimise feed wastage and chemical usage.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Finfish farm management - Genetics				
58.	Use all female or triploid salmonids in the farms.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
59.	Implement suitable management and planning measures to limit the possibility of genetic interactions.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
60.	Adhere to DFFE genetic management guidelines.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
61.	Use appropriate spawning regimes in the hatchery to maintain genetic diversity in the offspring.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
62.	Implement annual genetic monitoring between wild caught and farmed fish to monitor for any significant differences.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
63.	Implement the “Genetic Best Practice Management Guidelines for Marine Finfish Hatcheries in South Africa” developed by DFFE and ensure adequate genetic monitoring of brood stock rotation.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Finfish farm management - Escapes				
64.	Ensure good physical and biological containment to limit the effects of escaped stocks.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
65.	Use robust, well-maintained containment systems. Operators are required to maintain documented records of inspections and maintenance.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
66.	Maintain cage integrity through regular maintenance and replacement. Operators are required to maintain documented records of inspections and maintenance.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
67.	Develop and implement recovery procedures should escapes occur.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Finfish farm management - Maintenance				

ID	EMPr Outcomes	Findings		Recommendation
68.	Keep cage netting clean, free of algal growth and free of any damage that could lead to the escape of farmed organisms or the penetration of predators.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
69.	Keep nets well maintained (e.g. repair holes immediately). Operators are required to maintain documented records of inspections and maintenance.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Finfish farm management - Waste				
70.	Do not discard fouling organisms removed from netting taken onshore for maintenance back into the marine environment.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
71.	Do not discard sick or dead fish into the marine environment	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
72.	Provide fish mortality to fishmeal farms in the area, where possible. Where not possible, dispose of fish mortality in line with legal requirements.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Finfish farm management - Predators				
73.	Remove any injured or dead fish from cages promptly.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
74.	Do not release any blood and/or offal (organic waste) from finfish into the bay.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
75.	Do not release any blood and/or offal (organic waste) from finfish into the bay.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
76.	Monitor whether predators are attracted to cages, e.g. through the presence of wild fish close to the cages.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Finfish farm management - Diseases				
77.	Ensure all fry undergoes a health examination prior to stocking in sea cages.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
78.	Take necessary action to eliminate pathogens through the use of therapeutic chemicals or improved farm management as per veterinary identification and prescriptions.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
79.	Regularly inspect stock for disease and/parasites as part of a formalised stock health monitoring programme approved by DFFE.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
80.	Maintain comprehensive records of all pathogens and parasites detected as well as logs detailing the efficacy of treatments applied.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
81.	Locate cages stocked with different cohorts of the same species as far apart as possible; if possible stock different species in cages successively.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
82.	Implement good house-keeping practices in place at all times i.e. keep nets clean and allow sufficient fallowing time on sites to ensure low environmental levels of intermediates hosts and or pathogens.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
83.	Treat adjacent finfish cages simultaneously even if infections have not yet been detected if prescribed by veterinarian.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
84.	Quarantine new juveniles or new broodstock when introduced to identify and treat potential diseases and parasites under the supervision of a veterinary professional. OR Ensure all newly introduced organisms undergo a health exam by a suitably qualified veterinarian and are certified as disease free.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
85.	Humanely euthanize production animals that are injured or diseased to a point that causes excessive suffering.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
86.	Remove and dispose of dead organisms daily (weather permitting) and dispose of in a responsible manner.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
87.	Clean and sanitise equipment used for disposing of dead organisms.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
88.	Appoint an aquaculture veterinarian to conduct a health assessment at least annually.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
89.	Take the following actions in the event of a disease breakout: • Notify the branch DFFE Fisheries Management immediately;	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
	• Isolate the affected individuals / cages; • Identify the disease; • Consult a veterinarian for treatment advice; • Apply treatment recommended by veterinarian; and • Monitor the efficacy of the treatment.			
Finfish farm management - Medication and pesticides				
90.	Seek assistance of an aquaculture veterinarian in the use of therapeutics and treatments, where required.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
91.	Avoid using excessive amounts of medication, antibiotics, hormones and pesticides.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
92.	The use of chemicals in disease management is discouraged due to negative impacts on the aquatic environment, consumer reluctance, and because the frequent use of traditional therapeutics may trigger the emergence of disease-resistant strains of pathogens.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
93.	Reduce levels of nutritional therapeutants and trace contaminants in feed, using only the lowest effective doses.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
94.	Use the most efficient drug delivery mechanisms that minimise the concentrations of biologically active ingredients entering the environment.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
95.	Malachite Green as a bactericide or fungicide is discouraged.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
96.	Reduce reliance on therapeutic chemicals through the use of sound husbandry practices aimed at disease and stress prevention.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
97.	Antibiotics use as a prophylactic or preventative measure is discouraged but may be used in consultation with the authorities.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
98.	Use bait type pesticides with care to prevent poisoning of non-target species.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
99.	Use only recognised and registered chemicals as treatments, medicines, herbicides, insecticides, pesticides and for other purposes.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
100.	Record dosages, application methods and the resultant outcome of all treatments in a treatment register.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
101.	File Material Safety Data Sheets (MSDS) or medicine datasheets and reference during use, storage and disposal.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Gracilaria management				
102.	Use only locally sourced Gracilaria for stocking the ropes.	Not audited	None of the seaweed farms were audited during this audit due to the Farm Manager not being available.	No immediate action required.
103.	Avoid the use of fertilizers or chemicals in the culture of seaweeds.	Not audited	None of the seaweed farms were audited during this audit due to the Farm Manager not being available.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
104.	Use as a co-culture species for use in Integrated Multi-Trophic Aquaculture (IMTA) rather than as monoculture, if possible.	Not audited	None of the seaweed farms were audited during this audit due to the Farm Manager not being available.	No immediate action required.
Predatory birds				
105.	Use exclusion devices to prevent killing of stock by predatory birds and do not kill predatory birds.	Not audited	Exclusion devices not installed. However, no evidence of predatory birds killing stock or killing of predatory birds was identified during the audit.	No immediate action required.
Other				
106.	Comply with all management programmes required by DFFE Branch Fisheries Management (e.g. health management programme) including the reporting requirements of these programmes.	Compliant	The ECO and ADZ Operators report to the DFFE: Fisheries Management as per the EA and EMPr requirements.	No immediate action required.
Response to environmental incidents				
107.	In the event of environmental pollution, immediately stop the activity causing the problem.	Compliant	No incidents of environmental pollution have occurred or been reported during the reporting period. Regulation beach inspections and clean-ups are conducted by operators to record, note, collect and dispose/reuse of ADZ infrastructure.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
108.	Initiate steps to contain the environmental incident at a farm level.	Not audited	No incidents of environmental pollution were observed or reported to the Auditor.	No immediate action required.
109.	Only resume activity once the problem has been stopped or (in the case of spillages) the pollutant can be captured without reaching the marine environment.	Not audited	No incidents of environmental pollution were observed or reported to the Auditor.	No immediate action required.
110.	Repair faulty equipment as soon as possible. Operators are required to maintain documented records of inspections and maintenance.	Compliant	Faulty equipment seems to be repaired as soon as possible. The majority of farms inspected during the on-water inspection had infrastructure in good working condition. All records of inspections and maintenance are recorded in the Farm Monitoring Reports.	No immediate action required.
111.	Report all environmental incidents related to aquaculture farm operation to the branch Fisheries Management, including: - Loose / drifting equipment; - Accidents (collisions) with other water users; - Entanglement of marine animals; - Loss of stock; and - Disease outbreak or algal bloom. - Spill of pollutants; and	Compliant	According to the ECO, all incidents are reported to the ECO by the public, operators and other stakeholders. The ECO's monthly report records environmental incidents, and the report is sent to the branch Fisheries Management Department (See Appendix H).	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
	- Waste in the marine environment.			
112.	Request assistance with environmental incidents from the DFFE Branch Fisheries Management/ AMC if the incident cannot be dealt with at farm level.	Compliant	Naturally all incidents are reported via the ECO Monitoring Reports to the DFFE Branch Fisheries Management/AMC and when incidents are not resolved then assistance is requested from the Fisheries Management Department and the AMC. Currently the ECO awaits feedback regarding a previous incident that occurred on the 10 th of September 2025 according to the ECO's latest Monitoring Report dated January 2026.	No immediate action required.
113.	Rectify activities that elicit noise or odour complaints.	Compliant	No noise or odour complaints have been reported or recorded during the reporting period. Compliant by absence of action.	No immediate action required.
Entanglement				
114.	Ensure that exclusion nets are clearly visible under and above water.	Not audited	No exclusion nets are currently used in the ADZ.	No further action required.
115.	Ensure all mooring lines and rafts are highly visible (use thick lines and bright antifouling coatings).	Compliant	All mooring lines were visible. Thick lines were being used and large buoys (See Appendix E).	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
116.	Implement the relevant AMC protocol in case of entanglement.	Not audited	No incidents of entanglement reported during the auditing period.	No immediate action required.
117.	Request assistance with entanglement incidents from the DFFE: Branch Fisheries Management / AMC if the incident cannot be dealt with at farm level.	Not audited	No incidents of entanglement reported during the auditing period.	No immediate action required.
118.	Contact experts from the NSRI in the event of large marine mammals becoming entangled in cage systems.	Not audited	No incidents of entanglement reported during the auditing period.	No immediate action required.
119.	Keep record of all incidents of entanglement and the outcome of these incidents.	Compliant	Last entanglement was in 2021. Incidents are recorded in the monthly ECO Monitoring Reports and separated into incident registers. No records of the last entanglement were observed in one of the registers provided to the ECO.	Holder – Ensure all entanglement incidents are recorded in a register. Consider keeping a separate incident register just for entanglements to prove compliance with Condition 119.
Incident Logging				
120.	Maintain an incident register in which all events caused by farming activities or farm infrastructure, such as escape events or the dislodging of infrastructure, which may have environmental risks, are recorded.	Compliant	The ECO maintains an incident register. Incidents are recorded in the monthly ECO Monitoring Reports and separated into incident registers.	No immediate action required.

ID	EMPr Outcomes	Findings	Recommendation
121.	Report all non-routine events that may have an environmental impact to the DFFE Branch Fisheries Management / AMC ECO.	Compliant All incidents are recorded in the monthly ECO Monitoring Reports which are submitted to the DFFE Branch Fisheries Management/AMC.	No immediate action required.

Table 5: Audit of Compliance with Section 6.1 Decommissioning Phase – Farm-level management and mitigation measures

ID	EMPr Outcomes	Findings	Recommendation
Determine requirements			
1.	Initiate consultation with the AMC before decommissioning to discuss potential decommissioning options, methods and requirements.	Partial compliance Several farms are currently in the process of decommissioning due to Section 28(3)(c) processes. The ECO confirmed the decommissioning processes have been actively followed up and formally raised with the AMC, while the DFFE Compliance and Sector Monitoring Directorate have also been informed. However, according to the latest ECO Monitoring Report, Lagoon Aqua have removed all their infrastructure and closed their farms, although no decommissioning plan has been submitted to the ECO or the AMC.	Lagoon Aqua – Ensure a decommissioning plan is submitted to the AMC ASAP.
2.	Determine other potential commercial uses for the plant equipment and infrastructure to be decommissioned.	Compliant According to the ECO, this is undertaken by the AMC. Some of the moorings are moved to other farms.	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
			This was confirmed in one of the decommissioning plans in the evidence folder (See Appendix H).	
3.	Identify and assess any potential environmental and societal risks associated with the preferred method of decommissioning and implement mitigation to minimise risks.	Not audited	No decommissioning plans have been received during the audit.	No immediate action required.
4.	Notify the AMC before decommissioning activities commence in a formal decommissioning plan with actions and deliverable dates.	Non-compliant	Several farms are currently in the process of decommissioning due to Section 28(3)(c) processes. However, according to the latest ECO Monitoring Report, Lagoon Aqua have removed all their infrastructure and closed their farms, although no decommissioning plan has been submitted to the ECO or the AMC.	Lagoon Aqua – Ensure a decommissioning plan is submitted to the AMC ASAP.
Removal of aquaculture equipment				
5.	Remove all aquaculture infrastructure and equipment and dispose of it appropriately.	Compliant	All farms that have been decommissioned that were inspected during the on-water inspection had all the infrastructure removed from the water. Some of the moorings were moved to other farms according to the ECO. This was confirmed in one of the	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			decommissioning plans in the evidence folder (See Appendix H).	
6.	Do not deposit any parts of the decommissioned infrastructure and equipment in the Bay.	Compliant	None was observed or reported to the ECO/Auditor during the auditing period and inspection.	No immediate action required.
7.	Ensure that no litter and debris reach the marine environment during the removal of equipment, cleaning of infrastructure and general decommissioning activities.	Compliant	None was observed or reported to the ECO/Auditor during the auditing period and inspection.	No immediate action required.
8.	In the event of equipment, litter and debris entering the sea, remove these as soon as possible.	Compliant	No litter, equipment or debris was observed in the sea or around the farms during the audit inspection. This is on-going.	No immediate action required.
9.	Train all staff in the effects of debris and litter in the marine environment and appropriate disposal procedures.	Partial compliance	According to the ECO Monitoring Report and previous Regulation 34 Audit Report (See Appendix H), all staff are trained on waste disposal procedures. No evidence to show waste management training had been conducted was provided to the Auditor.	Holder – Ensure all staff are trained on waste management and disposal procedures and ensure records of training are kept and provided to the ECO/Auditor.
10.	Aim to reuse or recycle decommissioned items.	Not audited	No evidence of decommissioned items being reused has been provided.	No immediate action required.
11.	Collect recyclables separately and deliver these to suitable facilities or arrange for collection.	Not audited	No decommissioning plans have been received during the audit. No	No immediate action required.

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ID	EMPr Outcomes	Findings		Recommendation
			evidence to confirm compliance has been received.	
12.	Do not allow any burning or burying of waste on site.	Compliant	No burning or burying of waste has been reported during this reporting period. None was observed during the audit inspection.	No immediate action required.

Table 6: Audit of Compliance with Section 7.1 Monitoring – ADZ-level monitoring requirements

ID	EMPr Outcomes		Findings	Recommendation
General				
1.	Ensure that the aquaculture industry association in Saldanha Bay designates an individual to monitor the shoreline of the Bay, Spreeuvalle and Paradise Beaches weekly for any aquaculture equipment washed ashore. The frequency of monitoring can be reduced after 6 months with the approval of the AMC if incidents of equipment washing ashore are very limited.	Compliant	Designated Operators have taken on responsibility of undertaking regular beach clean-ups to remove debris from the ADZ that has washed ashore. This is also monitored by bi-weekly inspections from the ECO, who records waste observed and requests the Operators to remove it during their next beach clean-up. Beaches that are monitored for debris are the Boulders beach, Spreeu Walle, Langebaan beach (79 Main Road) and Breakwater. Beach clean-up reports have been sent to the Auditor (See Appendix H).	No immediate action required.
2.	Ensure that the shoreline of the bay, including Spreeuvalle and Paradise Beaches is monitored for any aquaculture equipment washed ashore.	Compliant	As above.	Operators – Ensure Paradise Beach is included in the beach clean-ups.
3.	Appoint / nominate a suitably qualified specialist to compile a comprehensive Sampling Plan for the ADZ and present the Sampling Plan to the AMC and consultative forum for review.	Compliant	According to the ECO Monitoring Reports, a Sampling Plan was compiled in December 2018 and revised in 2022 with the final plan being submitted on the 08 December	No immediate action required.

ID	EMPr Outcomes		Findings	Recommendation
			2022. This was distributed to both the CF and the AMC on 13 December 2022 (See Appendix H). A copy of the Sampling Monitoring Plan can be view in Appendix H.	
4.	Ensure that a suitably qualified specialist conducts sampling and sample analysis in line with the Sampling Plan.	Compliant	According to the ECO Monitoring Reports, sampling commenced in 2020 and an external specialist monitoring service provider was appointed in November 2021 and reappointed for the period 2024 – 2027. The latest reef survey sampling report was done in the 2025 year and has been sent to the Auditor (See Appendix H).	No immediate action required.
5.	Appoint a suitably qualified specialist to monitor / audit compliance of aquaculture operators with specifications in the EMPr.	Compliant	The following ECO appointments have been made thus far: • Ecosense (Sep 2018 – Aug 2019) • SRK (Sep 2019 – Feb 2020) • Errol Cerff (Mar 2020 – Mar 2022) • Anchor Research and Monitoring (Apr 2022 – May 2025)	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			NCC Environmental Services (Oct 2025 – Jan 2026) It should be noted that there was no ECO appointment between May 2025 to October 2025. Currently NCC Environmental Services are the appointed ECO Monitoring activities on site (See Appendix H).	
6.	Ensure that a suitably qualified specialist monitors / audits compliance of aquaculture operators with specifications in the EMPr and submits EMPr Compliance Reports.	Compliant	As above. Monthly ECO Monitoring Reports are submitted to the Competent Authority – DFFE: Director of Compliance.	No immediate action required.
7.	Support ongoing State of the Bay monitoring and aim to include parameters that are also relevant to monitoring potential impacts of aquaculture and respective baselines.	Compliant	The Sampling Plan is aligned to the State of the Bay (SOB) monitoring, and the same methodologies were used for baseline allowing comparison with SOB data. Sample sites for the ADZ of the Sampling Plan are different to those used for the SOB, providing for monitoring of a larger area.	No immediate action required.
8.	Review and interpret results of environmental monitoring in Saldanha Bay and make decisions based on the	Compliant	The AMC review and interpret results of the environmental monitoring to	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
	outcomes of environmental monitoring, which could lead to the amendment of operations within the authorised limits.	Compliant	make informed decisions and amendments to operations as and when required.	
9.	Develop effective protocols to report on stocking densities, mortalities, graded and ungraded production, biofouling discards.		Farm Monitoring Reports from the Operators record this information and are sent to the ECO monthly (See Appendix H).	No immediate action required.

Table 7: Audit of Compliance with Section 7.2 Monitoring – Farm-level monitoring requirements that must be implemented by individual operators

ID	EMPr Outcomes		Findings	Recommendation
Equipment				
1.	Establish an effective monitoring protocol to ensure that longline / raft / net integrity and supporting infrastructure are maintained. Ensure that: - Primary longline / raft / net is secured appropriately so that it is kept taut and rigid at all times. Nets of fish cages should be weighted; - Ropes and anchor lines are taut, especially after rough seas; - Ropes are routinely inspected for wear, especially after rough conditions, and replaced as and when required; and - There is adequate separation between rafts and longlines, even during strong currents and rough seas; or - There is adequate separation between the primary and secondary nets of fish cages, even during strong currents and rough seas.	Compliant	The ECO does an on-water inspection bi-weekly to check these requirements. Operators check this daily during operational activities and report all incidents to the ECO. Incidents are also reported in the Farm Monitoring Reports (See Appendix H). The Auditor inspected this during the on-water audit inspection and found most of the farm Operators to be compliant (See Appendix G).	No immediate action required.
2.	Maintain a comprehensive and detailed register of the quantities of chemicals, antibiotics, antifoulants and hormones etc. that are utilised.	Not audited	Chemicals are not used by the bivalve industry. Antifoulants and hormones are used by finfish only. No finfish farming is currently underway in the ADZ.	No immediate action required.
Water quality				

ID	EMPr Outcomes	Findings		Recommendation
3.	Monitor water quality and sediment quality as required for operations and/or by other authorisations.	Not audited	According to the first initial Regulation 34 Audit Report undertaken in 2020 (See Appendix H), this requirement applies to finfish farming. No finfish farming is currently underway in the ADZ.	No immediate action required.
Biosecurity				
4.	Establish a traceability protocol of the cultured finfish / shellfish and its products.	Compliant	A traceability protocol has been established for the shellfish in the ADZ.	No immediate action required.
5.	Develop and implement a stock health monitoring programme, including regularly inspecting stock for disease and parasites, in collaboration with the DFFE branch Fisheries Management.	Compliant	Frequent biotoxin monitoring is conducted by the farm Operators, with reports analysed by the state veterinarian. The state veterinarian informs the AMC, should levels exceed the food safety threshold. An alert was issued on the 25th of November 2025 requesting Small Bay Operators to commence with intensive sampling of PST due to increased levels detected within the ADZ area. Additionally, farming operations in the Big Bay precinct were closed from the 25th of November to the 10th of December with Operators notified to recall all	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			product from the 21st of November 2025. Similarly E.Coli test results were above the allowable limit on the 12th of January 2026 and farm Operators were informed not to harvest from the affected areas in Small Bay during the relevant time. The Small Bay farming areas was reopened on the 19th of January 2026 (See Appendix H).	
6.	Ensure that facilities are inspected by an aquaculture veterinarian to allow for monitoring of the health status of cultured stock.	Compliant	Dr Vianca Naidu and Ms Primrose Lehubye monitors animal health according to the Applicant. Animal health monitoring is generally performed by the Aquatic Animal Health Unit, consisting of Dr Vianca Naidu (State Veterinarian: Aquatic Organisms) and Ms Primrose Lehubye (EOSP), where applicable.	No immediate action required.
Fish farming				
7.	Monitor culture-fish mortalities to ensure dead fish are quickly removed, to minimise contamination and fluxes in waste production.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
8.	Monitoring feed input and uptake to ensure feed waste is limited (i.e. prevent overfeeding by maximising the feed conversion ratio of cultured fish).	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
9.	Develop and implement a protocol to monitor escapes from finfish farms.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
10.	Adopt the MOM management system (or similar) for monitoring.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
11.	Ensure adequate genetic monitoring of brood stock rotation.	Not audited	No finfish farming is currently underway within the ADZ.	No immediate action required.
Marine animals				
12.	Keep a log of all cetaceans, seabirds and predators recorded in the vicinity of fish farms, including behavioural observations. These data should be periodically compiled and analysed by experts.	Compliant	The Captains and teams on the boats for the various farms, record fauna observed around the farming operations. These records are logged in the ETP logs and are provided to the ECO regularly (See Appendix H).	No immediate action required.
13.	If predator deterrents are used, closely monitor cetacean, seal, shark and seabird behaviour.	Not audited	No predator deterrents are used in the ADZ currently.	No immediate action required.
14.	Record all marine vertebrate mortalities resulting either directly or indirectly from aquaculture operations. Where appropriate modify equipment and/or implement other measures to reduce mortalities.	Compliant	A dead Cape Fur Seal and a dead Kelp Sea Gull were observed during the beach inspection during the audit. No further dead fauna have	No immediate action required.

ID	EMPr Outcomes	Findings		Recommendation
			been reported or recorded during the auditing period.	

5.3. Evaluation of the EMPr's Ability to Manage and Mitigate Impacts

This section evaluates the effectiveness of the Environmental Management Programme (EMPr) in managing and mitigating environmental impacts associated with the project.

(a) Regulation 34(3)(a): Adequacy of EMPr Measures to Avoid, Manage, and Mitigate Environmental Impacts

In the auditor's opinion, the EMPr has sufficiently provided for the avoidance, management, and mitigation of environmental impacts associated with the undertaking of the activity, specifically during the initial construction phase, operational phase and within the scope of this audit.

(b) Regulation 34(3)(b): The level of compliance with the provisions of the EA and EMPr

The level of compliance with the provisions of the EA and EMPr has been addressed in **Table 2 to Table 37**, with a summary of compliance provided in **Table 8**.

(c) Regulation 34(4): Need for Amendments to the EMPr

No amendments to the avoidance, management and mitigation measures in the EMPr are required at this stage.

6. FINDINGS & CONCLUSION

The audit assessed a total of 240 conditions: 66 from the EA and 174 from the EMPr. The conditions that were deemed "not applicable" or "not audited" were not considered for the below rating, to improve the accuracy of the audit score.

Summary of Audit Outcomes

A summary of the audit outcomes and associated compliance status is provided **Table 8** below.

Table 8: Summary of Compliance Outcomes

# Items	Compliance	% Compliance
	Fully compliant / condition completed	91%
	Partial compliance (with reasons provided)	6%
	Serious or ongoing non-compliance (requiring urgent action)	3%

Key Findings

The audit findings, supported by ECO reporting, indicate that the project is **largely compliant** with the conditions of the EA and EMPr.

- **One (1) non-compliance and four (4) partial compliances** were recorded with respect to the EA.
- **Three (3) non-compliances and five (5) partial compliances** were recorded in the EMPr checklist.
- **Recommendations**

Recommendations for addressing the findings are provided in the "Action" column of the compliance tables in **Section 5**. Implementing these actions will improve the overall compliance.

No inconsistencies were identified between the EA and the EMPr.

7. STAKEHOLDER ENGAGEMENT

No formal public consultation process was undertaken for this audit. However, **ongoing engagement** was conducted with the ECO and relevant site personnel throughout the audit process.

Given that the audit findings did not reveal any significant issues, such as insufficient mitigation of environmental impacts or major non-compliances with the EA, a public participation process in accordance with Regulation 34(5) was deemed unnecessary. As a result, no formal public consultation was conducted beyond the ongoing engagement with the ECO and site personnel. The completed Regulation 34 Audit Report will be sent to the registered I&AP's within 7 calendar days of the report being sent to the Department.

APPENDICES

Appendix A: Environmental Authorisation (EA)

Appendix B: Environmental Management Programme (EMPr)

Appendix C: Notification of commencement

Appendix D: Auditor CV

Appendix E: Site Photographs

Appendix F: ECO Monitoring Reports

Appendix G: On-water Inspection Checklists

Appendix H: Evidence Folder