

SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE

Environmental Control Officer Site Inspection and Farm Monitoring Verification Report

PREPARED FOR:

The Department of Forestry,
Fisheries and the Environment
Branch: Fisheries Management

PREPARED BY:

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**forestry, fisheries
& the environment**

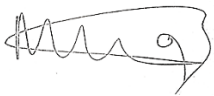
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

DECLARATION OF INDEPENDENCE

Environmental Control Officer

I, Michelle Lee, as duly authorised representative of NCC Environmental Services (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which the Department of Forestry, Fisheries and the Environment ("**DFFE**") has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Michelle Lee', enclosed within a simple rectangular box.

Michelle Lee

25 November 2025

Environmental Control Officer

NCC Environmental Services (Pty) Ltd

Audit Reviewer

I, Nick Gates, as duly authorised representative of NCC Environmental Services (Pty) Ltd, hereby confirm my independence (as well as that of NCC) as an audit reviewer and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which the Department of Forestry, Fisheries and the Environment has appointed NCC as Environmental Control Officer, other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Nick Gates', enclosed within a simple rectangular box.

Nick Gates

25 November 2025

ECO Line Manager

NCC Environmental Services (Pty) Ltd

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TABLE OF CONTENTS

ABBREVIATIONS	8
1 INTRODUCTION	9
1.1 AUDIT SCOPE AND PURPOSE.....	10
1.2 ASSUMPTIONS AND LIMITATIONS	11
1.3 COMPLIANCE WITH REGULATION 34 OF THE EIA REGULATIONS, 2014 (AS AMENDED)	11
1.4 MONITORING FREQUENCY AND REPORTING	13
2 PROJECT TEAM	14
3 AUDIT APPROACH	16
3.1 GENERAL APPROACH	16
3.2 AUDIT TABLES AND COMPLIANCE RATINGS.....	16
3.3 SITE INSPECTIONS.....	17
3.4 CONSULTATIONS AND COMMUNICATIONS.....	19
3.4.1 Consultations.....	19
3.4.2 Communications.....	20
4 GENERAL (NOTABLE EVENTS)	21
4.1 GENERAL OUTSTANDING MATTERS.....	21
4.2 FARM MAINTENANCE PLAN FEEDBACK.....	21
4.3 CONSERVATION OF FAUNA.....	21
5 BEACH INSPECTIONS	24
5.1 BEACH MONITORING BY OPERATORS	24
5.2 BEACH MONITORING BY THE ECO	25
6 INCIDENTS AND ACCIDENTS	26
7 DECOMMISSIONING PLANS.....	27
8 FARM MONITORING REPORTS	28
9 OPERATOR COMPLIANCE WITH THE EA AND EMPr.....	30
9.1 WASTE MANAGEMENT	32
9.2 AUDIT COMPLIANCE AND FINDINGS.....	32
9.2.1 Minor improvements required.....	33
9.2.2 Major improvements required.....	33
9.2.3 Summary of Compliance with the EA and EMPr.....	34
10 RECOMMENDATIONS AND CONCLUSION	35
10.1 RECOMMENDATIONS	35
10.2 CONCLUSION.....	35
10.3 EVALUATION OF EMPr	36
ANNEXURE A – CONCERNS/COMPLAINTS REGISTER.....	38
ANNEXURE B – PHOTOGRAPHS.....	39

LIST OF FIGURES

Figure 1. Locality map of ECO on-water inspection route with farms audited noted. It is noted that the start of the voyage, including the visit to Mika Growers is not recorded on the GPS (created via Strava and Google Earth Pro, 2025)	18
Figure 2. Floats collected from beaches in various precincts. Orange arrows indicate absence of reporting.	25
Figures 3. Beach inspection conducted by ECO during November 2025. It is noted that the Marcus Island beach inspection is not recorded on the GPS (created via Strava and Google Earth Pro, 2025)	26
Figure 4. Historic compliance upheld by the Saldanha ADZ	35
Figure 5. Floats observed black in colour and marked with lease name and sequence number.	40
Figure 6. Floats observed to be in straight lines and well floated.....	40
Figure 7. White cable ties observed as unique identifying marker.....	40
Figure 8. Floats observed black in colour and marked with lease name and sequence number.	41
Figure 9. Floats observed black in colour and marked with lease name and sequence number.	41
Figure 10. White cable ties observed as unique identifying marker.	41
Figure 11. Dormant lines observed black in colour to limit visual disturbance. Floats marked with lease name and sequence number.....	42
Figure 12. No litter or oil spills observed in the water.....	42
Figure 13. All lines noted to be straight and floated.....	42
Figure 14. Labelling of end floats in lease names and sequence numbers	42
Figure 15. Unique identifying markers observed on end floats.....	43
Figure 16. Lines observed straight and taught.	43
Figure 17. Floats marked with lease name and sequence number.....	43
Figure 18. Floats observed black in colour	44
Figure 19. White cable ties observed as unique identifying marker.	44
Figure 20. Captured 25/10/2025 - Before	44
Figure 21. Captured 25/10/2025 - After	44
Figure 22. Captured 2025/10/22 - Before	44
Figure 23. Captured 2025/10/22 - After	44
Figure 24. Green rope found along breakwater	45
Figure 25. Rope offcut found along breakwater	45
Figure 26 Large rope found along the breakwater	45
Figure 27. Grey container found along breakwater	45
Figure 28. Grey container found along breakwater	45
Figure 29. Green netted rope observed at breakwater.	45
Figure 30. Green rope found along breakwater	46
Figure 31. Large rope found along the breakwater	46
Figure 32. Blue rope observed along breakwater.....	46
Figure 33. Blue rope observed along breakwater.....	46
Figure 34. Oyster basket remnant found along breakwater.....	46
Figure 35. Various rope and netting collected by the ECO.....	46

LIST OF TABLES

Table 1: Summary of environmental requirements / criteria relating to the overall project.....	10
Table 2. Legal requirements for Audit Reports as per Appendix 7 of the EIA Regulations, 2014 (as amended).12	
Table 3. Line Manager Details.....	14
Table 4. Lead ECO Details.....	14
Table 5. Secretariat and support details	15
Table 6: Compliance rating and scoring.	17
Table 7. Saldanha Bay ADZ Farm Inspection Schedule. Grey blocks indicate farms that have had no farming activity or infrastructure in the water.....	18

Table 8. Communications received by the ECO during the audit period	20
Table 9. Precinct observations verified for October 2025.	22
Table 10. Faunal Observations made within the Saldanha Bay ADZ by Ocean Grown Aquaculture from 29/09/2025 to 31/10/2025.....	23
Table 11. Faunal Observations made within the Saldanha Bay ADZ by Imbaza Mussels from the 01/10/2025 to the 31/10/2025.....	23
Table 12. Members of Aquaculture Industry committed to beach monitoring and clean-up as required by EMPr conditions 1 and 2 of Table 7-1.....	24
Table 13. FMR submission status, supporting production - verification documents and visual inspection logs. Late submissions, lack of supporting documents and not providing visual logs are highlighted in red.	28
Table 14: November 2025 Audit Compliance	33
Table 15. Historic compliance with the EA and EMPr	34

ABBREVIATIONS

ADZ	Aquaculture Development Zone
AMC	ADZ Management Committee
BAR	Basic Assessment Report
BSASA	Bivalve Shellfish Association of South Africa
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ER	Employer's Representative
ETP	Endangered, threatened and protected
FMR	Farm Monitoring Reports
I&APs	Interested and Affected Parties
IAIASA	International Association for Impact Assessment South Africa
MLRA	Marine Living Resources Act, 1998 (Act No. 18 of 1998)
MLRF	Marine Living Resources Fund
NCC	NCC Environmental Services (Pty) Ltd
NCR	Non-Compliance Report
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
SAMSA	South African Marine Safety Authority
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SHERQ	Safety Health Environment Risk & Quality.
TBC	To Be Confirmed
TNPA	Transnet National Ports Authority

1 INTRODUCTION

The Department of Forestry, Fisheries and the Environment (“**DFFE**”), through the Marine Living Resources Fund (“**MLRF**”), has established a sea-based Aquaculture Development Zone (“**ADZ**”) within Saldanha Bay, Western Cape, to promote sustainable marine aquaculture and support economic development in the coastal region. In accordance with the Environmental Authorisation (“**EA**”) and the Environmental Management Programme (“**EMPr**”) issued for the ADZ, the appointment of an independent Environmental Control Officer (“**ECO**”) is a regulatory requirement to ensure environmental compliance and the responsible execution of aquaculture operations.

NCC Environmental Services (Pty) Ltd (“**NCC**”) has been appointed by the DFFE to provide suitably experienced independent ECO services for the Saldanha Bay sea-based ADZ in compliance with the conditions stipulated in the EA and EMPr for a contract period of four (**4**) months from 07 October 2025 to 06 February 2026.

The Saldanha Bay ADZ commenced with operations in **February 2019**.

Ongoing complaints have been received from members of the public regarding debris originating from aquaculture operations washing ashore along public beaches. Reported debris typically includes crates, ropes, baskets, and floats, which are often biofouled and decomposing, resulting in unpleasant odours and attracting flies. Such occurrences are contrary to the requirements outlined in the ADZ EMPr and the individual farm EMPrs.

In response, minimum infrastructure requirements have been established, in consultation with the industry, to strengthen waste management practices and reduce debris generation. These guidelines also serve to align farm operations with the production limits prescribed in the EMPr and EA. While it is recognised that complete prevention of infrastructure loss is impractical, aquaculture operators and the Bivalve Shellfish Association of South Africa (“**BSASA**”) conduct regular beach inspections and clean-ups, often addressing debris unrelated to aquaculture activities.

Although these clean-up efforts have proven largely effective, the ADZ continues to prioritise the reduction of debris generation and the identification of operators who fail to adequately maintain farm infrastructure. Poor maintenance not only increases debris accumulation but also negatively impacts the reputation of the entire ADZ. Accordingly, operators are required to mark their infrastructure with unique identifiers and to ensure ongoing maintenance to minimise the risk of breakage and loss, as stipulated in the EMPr.

Currently, **two** (2) aquaculture operators have committed to monitoring and cleaning the primary receiving beaches for aquaculture-related debris. Evidence of these activities, including photographic records and waste data, is submitted to the ECO monthly. Furthermore, recognising the importance of accurate production data for assessing potential environmental impacts within the Saldanha Bay system, the ADZ Management

Committee (“**AMC**”) has directed that monthly ECO audits include verification of production figures. To this end, operators submit monthly Farm Monitoring Reports (“**FMRs**”) with supporting documentation to enable cross-verification of reported sales and production data.

The ECO plays a critical role in monitoring and reporting on adherence to the stipulated environmental conditions, identifying potential risks, recommending corrective actions, and maintaining transparent communication between the MLRF, aquaculture operators, and relevant stakeholders.

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

Table 1: Summary of environmental requirements / criteria relating to the overall project.

Components of overall project	Environmental requirements / criteria			
	EA		EMPr	
	DFFE EA Ref No.	Issue date	Author	Date Compiled
Environmental Authorisation: Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	14/12/16/3/3/1/1728	08/01/2018	SRK	January 2018
Amendment of Environmental Authorisation issued on 08 January 2018 for the Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	14/12/16/3/3/1/1728/AM1	10/07/2019		
	14/12/16/3/3/1/1728/AM2	16/09/2020		
	14/12/16/3/3/1/1728/AM3	02/05/2024		

1.1 Audit Scope and Purpose

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and

- b) Submit an environmental audit report to the relevant competent authority.

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPs, and report on the extent to which the objectives of the EMPs and are being achieved.

1.2 Assumptions and Limitations

The compliance audit and report are based upon the assumptions that:

- i. All information received from the DFFE, their representatives and the ADZ Operators on which this audit report is based, is accurate and correct.
- ii. Evidence provided through interviews was factual and true.
- iii. No public consultation was undertaken as part of this ECO audit. In the opinion of the ECO, this was not required for the purposes of conducting the monthly site inspection audit.
- iv. A change of ECO has occurred during the operational phase of the ADZ. This was noted within the previous ECO monitoring reports submitted to the DFFE as well as the internal ECO handover report.
- v. The ECO had access to all the information necessary to compile this audit report. There are no gaps in knowledge that would suggest any level of uncertainty in the findings of the auditor.
- vi. The audit is based purely on the conditions as stipulated in the ADZ EA's, EMP's.
- vii. Where visual observations of equipment or infrastructure were not possible either due to the location or complexity to access the auditor has used other means to determine compliance, either through written evidence from operators or through interviews.
- viii. Note that NCC Environmental Services (Pty) Ltd are indemnified against any claim for damages that may result from this report and its recommendations.

1.3 Compliance With Regulation 34 of the EIA Regulations, 2014 (As Amended)

The National Environmental Management Act, 1998 (Act No. 107 of 1998) ("**NEMA**") provides the overarching framework for co-operative environmental governance in South Africa. In accordance with Sections 24(5) and 44 of NEMA, the Environmental Impact Assessment ("**EIA**") Regulations, 2014 (as amended), serve as the principal regulatory mechanism for managing and mitigating potential environmental impacts arising from listed activities and new developments.

NCC conducts environmental audits in terms of Regulation 34 of the EIA Regulations (as amended). The following should be noted in this regard:

- The audit reports prepared by NCC assess both compliance with, and the adequacy of, the approved EMPr.
- NCC's role does not extend to ensuring compliance with all other provisions of Regulation 34, such as initiating amendments to the EMPr or associated licences and permits and informing Interested and Affected Parties ("I&APs"). The responsibility for ensuring full compliance with applicable environmental authorisations and legislative requirements rests with the project proponent.
- Appendix 7 of the NEMA 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.

Table 2. Legal requirements for Audit Reports as per Appendix 7 of the EIA Regulations, 2014 (as amended).

Requirement	Report Section Reference
The environmental audit report must provide for recommendations regarding the need to amend the EMPr and the closure plan in the case of a closure activity.	Section 10
2. The objective of the environmental audit report is to- (a) report on- (i) the level of compliance with the conditions of the environmental authorisation and the EMPr and the closure plan in the case of a closure activity; and (ii) the extent to which the avoidance, management and mitigation measures provided for in the EMPr and closure plan achieve the objectives and outcomes of the EMPr and closure plan;	Section 5 - Section 10
2(b) identify and assess any new impacts and risks as a result of undertaking the activity;	Section 10
2(c) evaluate the effectiveness of the EMPr, and the closure plan in the case of a closure activity;	Section 10
2(d) identify shortcomings in the EMPr, and the closure plan in the case of a closure activity; and	Section 10
(e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and the closure plan in the case of a closure activity.	Section 5 – Section 10
(1) An environmental audit report prepared in terms of these Regulations must contain-	N/A
(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.	Section 2
(b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Page 2
(c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Section 1.1
(d) A description of the methodology adopted in preparing the environmental audit report.	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	Section 5 – Section 10

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, EMP, and where applicable, the closure plan.	
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge	Section 1.2
(g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Section 3.4
(h) A summary and copies of any comments that were received during any consultation process.	Section 3.4
(i) Any other information requested by the competent authority.	N/A

1.4 Monitoring Frequency and Reporting

The monitoring and reporting frequency by the ECO are monthly. In terms of this monitoring report, site inspections were undertaken on the **11th of November 2025** after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit.

This report details the activities and compliance demonstrated for the Saldanha Bay ADZ (EA: 14/12/16/3/3/1/1728, 14/12/16/3/3/1/1728/AM1, 14/12/16/3/3/1/1728/AM2 and 14/12/16/3/3/1/1728/AM3) only. This report covers the monthly reporting for the month of November 2025.

2 PROJECT TEAM

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

Our project team is composed of seasoned environmental professionals with extensive experience in environmental compliance monitoring. The project will be overseen by a dedicated Line Manager who will provide strategic oversight and quality assurance throughout the duration of the contract. Day-to-day implementation will be led by our appointed Lead ECO, who will be responsible for conducting all site inspections, monitoring activities, stakeholder engagement, and the preparation of monthly and final compliance reports in alignment with the tender scope requirements.

This team structure ensures both high-level oversight and operational efficiency, enabling us to deliver a responsive and technically sound service that meets the expectations of the DFFE and MLRF.

Table 3. Line Manager Details

PERSONAL DETAILS	
Name	Nicholas Anthony Gates
Profession	Service Line Manager: Environmental Management Consulting
QUALIFICATIONS	
Tertiary Education	
Bachelor of Social Science: Environmental and Geographical Sciences <i>University of Cape Town, 2007</i>	
Accreditation and Memberships	
- Environmental Assessment Practitioners Association of South Africa, <i>Registered EAP No. 2022/4508</i> - The Institute of Waste Management of South Africa, <i>Registration No. 30116139</i> - International Association of Impact Assessment South Africa, <i>Registration No. 5535</i> - Environmental Law Association: <i>Registration No. 2018/198/WC</i>	

Table 4. Lead ECO Details

PERSONAL DETAILS	
Name	Michelle Lee
Profession	Environmental Consultant and Environmental Control Officer
QUALIFICATIONS	
Tertiary Education	
BSc Hon Marine Biology <i>University of Cape Town</i>	

BSc Applied Biology, Ecology and Evolution, Marine Biology <i>University of Cape Town</i>
Accreditation and Memberships
The Environmental Assessment Practitioners Association of South Africa: Candidate EAP 2021/4150

Table 5. Secretariat and support details

PERSONAL DETAILS	
Name	Luke Saunders
Profession	Environmental Consultant
QUALIFICATIONS	
Tertiary Education	
BSocSci. Environmental & Geographical Science <i>University of Cape Town, 2019</i> BSc Hons. Environmental Management (in progress) <i>University of South Africa, 2025</i>	
Accreditation and Memberships	
International Association for Impact Assessment South Africa (IAIAsa): Membership No 7453 Environmental Impact Practitioners Association of South Africa (EAPASA): Candidate EAP 2024/8897	

3 AUDIT APPROACH

3.1 General Approach

The ECO conducts monthly visual inspections of selected farms within the Saldanha Bay ADZ, utilising a vessel provided by one of the operators. Photographs are captured during these inspections to serve as evidence of compliance (**Annexure B**). In addition, the ECO inspects specific beaches surrounding the ADZ to identify any aquaculture-related debris that may have washed ashore.

During farm inspections, the following elements are verified in accordance with the EA, associated guidelines, and the approved EMPr:

- Number of lines or rafts in operation.
- All lines are taut and properly aligned.
- Floats are muted in colour to minimise visual impact.
- Absence of litter on barges or rafts.
- No oil or fuel slicks present around working boats.
- Unique identifying markers are present on all infrastructure.
- No excess or loose equipment on rafts or barges.
- Vessels are noted to be in good working order.

3.2 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs during the reporting period. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 6** below.

Table 6: Compliance rating and scoring.

Status	Scoring	Description
Compliant	2	<i>No improvements required</i>
Partially Compliant	1	<i>Minor improvements required</i>
Non-Compliant	0	<i>Major improvements required</i>
Work In Progress	WiP	<i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>
Not Applicable / Not Audited	NA	<i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit.</i>
Informative	INFO	<i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria.</i>

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), non-compliant (red), Work in Progress (salmon), Not Auditable/Audited (grey) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the latter three audit status symbols, namely 'WiP', 'NA' and 'INFO' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

3.3 Site Inspections

The Saldanha Bay ADZ comprises **seventeen (17) lease areas** distributed across **three precincts**. To ensure that all farms are inspected by the ECO within an annual cycle, a subset of two to five farms are typically selected for inspection each month.

The farm inspection schedule for the period spanning from February 2025 is provided in **Table 7** below. The monthly ECO site inspection for November 2025 was conducted on the **11th of November 2025** at six lease areas in Big Bay. The following farms/lease areas were inspected during the current audit period:

- Blue Sapphire Pearls,
- Saldanha Bay Oyster Company (note this is owned by the Ocean Grown Aquaculture),
- Ocean Grown Aquaculture (previously known as West coast Oyster Growers),
- K2019005713,
- K2019005725, and

- Mika Growers.

All farms audited included an on-water inspection coupled with a verbal interview.



Figure 1. Locality map of ECO on-water inspection route with farms audited noted. It is noted that the start of the voyage, including the visit to Mika Growers is not recorded on the GPS (created via Strava and Google Earth Pro, 2025)

Table 7. Saldanha Bay ADZ Farm Inspection Schedule. Grey blocks indicate farms that have had no farming activity or infrastructure in the water.

Farm Name	Location	Species	ECO Audits					
			February 2025	March 2025	April 2025	May 2025	October 2025	November 2025
African Olive Trading	Small Bay	Mussels		X				
AquaFoods SA	Small Bay	Mussels Oysters				X		
Blue Ocean Mussels	Small Bay	Mussels	X					
Blue Sapphire Pearls	Small Bay	Mussels Oysters				X	X	
Imbaza Mussels	Small Bay	Mussels	X					
Saldanha Bay Oyster Company	Small Bay	Oysters					X	
Salmar Trading	Small Bay	Oysters					X	

West Coast Aquaculture	Small Bay	Mussels Oysters					X	
Ocean Grown Aquaculture	Small Bay	Mussels Oysters			X		X	
AquaFoods SA	Big Bay	Mussels						
Blue Sapphire Pearls	Big Bay	Mussels Oysters						X
K2019005713	Big Bay	Mussels						X
K2019005725	Big Bay	Mussels						X
Lagoon Aqua Farm	Big Bay	Oysters						
Madima General Agriculture Trading	Big Bay	Mussels			X			
Mika Growers	Big Bay	Mussels			X			X
Pluto Mussels and Trading	Big Bay	Mussels			X			
Saldanha Bay Oyster Company	Big Bay	Oysters						X
Southern Atlantic Sea Farms 2	Big Bay	Mussels						
Ocean Grown Aquaculture	Big Bay	Mussels Oysters						X

Please note: ECO inspections conducted from February 2025 to May 2025 were audited by the previously appointed ECO (*Anchor Research & Monitoring (Pty) Ltd*). Additionally, NCC has been advised that due to a delay in appointment processes, no ECO was appointed between the June 2025 and September 2025 period, however an oversight role was performed by the DFFE project team during this period.

Additionally, in respect of Table 7 above, lease areas where marine rights have been revoked or denied, or where no infrastructure is present in the water, have been removed from the table.

3.4 Consultations and Communications

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor, the Proponent, ADZ farm operators and relevant stakeholders which also includes communication with the competent authority (“CA”) in terms of report submission.

3.4.1 Consultations

The following consultations were undertaken during the audit period:

- 11th of November 2025 – Consultation was held with ADZ Operators of the following lease areas and their representatives, followed by an on-water inspection:
 - Blue Sapphire Pearls,
 - Saldanha Bay Oyster Company (note this is owned by the Ocean Grown Aquaculture),
 - Ocean Grown Aquaculture (previously known as West coast Oyster Growers),
 - K2019005713,
 - K2019005725, and
 - Mika Growers.
- 7th of November to the 21st of November 2025 - Farm Monitoring Reports were received from the various ADZ Operators.

Please note that no information was requested by the CA during the audit period.

3.4.2 Communications

Communications received by the Saldanha Bay ADZ ECO during the audit period (November 2025) are summarised in **Table 8** below.

Table 8. Communications received by the ECO during the audit period

Individual	Organisation	Subject
Mauritz Viljoen	Ocean Grown Aquaculture	SASF, SCSF, K13 & K25 decommissioning of sites
Kobus Nieuwodt	Lagoon Aqua	Site visit -Lagoon Aqua Farm
Ashley Patience	Ulwazi	Re: Saldanha Bay ADZ Reminder to submit Farm Monitoring Reports – request to be removed from mailing list
William Brink	SANParks	Saldanha Bay ADZ Request for ECO access to Marcus Island
Ethel Coetzee	TNPA	Saldanha Bay ADZ Request for ECO access to Marcus Island
Portia Dwane	DFFE - Directorate: Sustainable	RE: Alert: Increase in Alexandrium spp in Saldanha

	Aquaculture Management	
Gabriel Lee	Salmar Trading (Pty) Ltd	Follow-Up on Marine Right Amendment Request

4 GENERAL (NOTABLE EVENTS)

4.1 General Outstanding Matters

Any matters of concern or outstanding matters are to be recorded and summarised in the Communications Register (**Annexure A**).

The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

There is one outstanding concern raised for this audit period pertaining to the close out of an incident recorded in the October 2025 reporting period.

4.2 Farm Maintenance Plan Feedback

No updates to note during this reporting period.

4.3 Conservation of Fauna

In accordance with the approved EMPr, aquaculture operators are required to conduct daily visual observations to monitor potential interactions between marine animals and farm infrastructure. These observations are undertaken either from vessels during weekdays or from shore using binoculars (typically on weekends and public holidays when boats are not operating on the farms).

Operators submit visual observation logs to the ECO monthly to verify that all three precincts within the ADZ have been adequately monitored.

The data presented in **Table 9** below reflects the information submitted for the month preceding the reporting period.

Table 9. Precinct observations verified for October 2025.

Date	ADZ Precinct		
	Small Bay	Big Bay	North Bay
01/10/2025	✓	✓	✓
02/10/2025	✓	✓	✓
03/10/2025	✓	✓	✓
04/10/2025	✓	✓	✓
05/10/2025	✓	✓	✓
06/10/2025	✓	✓	✓
07/10/2025	✓	✓	✓
08/10/2025	✓	✓	✓
09/10/2025	✓	✓	✓
10/10/2025	✓	✓	✓
11/10/2025	✓	✓	✓
12/10/2025	✓	✓	✓
13/10/2025	✓	✓	✓
14/10/2025	✓	✓	✓
15/10/2025	✓	✓	✓
16/10/2025	✓	✓	✓
17/10/2025	✓	✓	✓
18/10/2025	✓	✓	✓
19/10/2025	✓	✓	✓
20/10/2025	✓	✓	✓
21/10/2025	✓	✓	✓
22/10/2025	✓	✓	✓
23/10/2025	✓	✓	✓
24/10/2025	✓	✓	✓
25/10/2025	✓	✓	✓
26/10/2025	✓	✓	✓
27/10/2025	✓	✓	✓
28/10/2025	✓	✓	✓
29/10/2025	✓	✓	✓
30/10/2025	✓	✓	✓
31/10/2025	✓	✓	✓

Operators are required to record and report any sightings of marine fauna, including endangered, threatened, or protected (“**ETP**”) species, as part of their routine monitoring. These observations are submitted to the ECO on a monthly basis to ensure that all precincts are effectively monitored and potential impacts on marine wildlife are documented.

During the month of **September/October 2025**, the following ADZ Operators submitted faunal observations recorded to the ECO:

- Ocean Grown Aquaculture; and
- Imbaza Mussels

Table 10 and **Table 11** below provide a summary of the observations provided per precinct.

It is further noted that a yellow-bellied sea snake (*Hydrophis platurus*) was found during harvesting within the Saldanha Bay Oyster Company lease area. It is reported that the sea snake had climbed into a crate/cesto. The snake was not noted to be in distress and returned safely to the ocean without an incident occurring.

Table 10. Faunal Observations made within the Saldanha Bay ADZ by Ocean Grown Aquaculture from 29/09/2025 to 31/10/2025

Faunal Species	Number of Observations within Saldanha Bay ADZ Precinct			
	Small Bay	Big Bay	Outer Bay North	Quay
Common Dolphin		10		
Cape Fur Seal	23	38		3
Cape Ganet	>9	>140		>5
African Penguin		9		
Oyster Catcher				

Table 11. Faunal Observations made within the Saldanha Bay ADZ by Imbaza Mussels from the 01/10/2025 to the 31/10/2025

Faunal Species	Number of Observations within Saldanha Bay ADZ Precinct			
	Small Bay	Big Bay	Outer Bay North	Outer Bay South
Common Dolphin		N/A		
Cape Fur Seal	37			
Cormorant, Cape	105			
Cape Ganet				
African Penguin				
Gull, Kelp	297			
Gull, Hartlaub's	151			
Oyster Catcher	46			

Note: It is noted that the above records represent a cumulative count of individuals observed during the reporting period. As such, this figure is unlikely to reflect the total number of unique individuals recorded for the month, as some may have been counted repeatedly on different days

5 BEACH INSPECTIONS

5.1 Beach Monitoring by Operators

Through the BSASA, four members of the aquaculture industry have committed to conducting regular beach monitoring and clean-ups across the three precincts of the ADZ, namely Small Bay, Big Bay, and Outer Bay North, effective from 8 September 2022.

The ECO provides a standardised feedback template to participating operators to record waste volume estimates, dominant waste types, and the proportion of waste attributable to aquaculture debris. Beach clean-up feedback is submitted the following month to ensure that data reflects a full month's collection period.

While comprehensive waste data is routinely received for Small Bay, Big Bay, and Outer Bay North, detailed feedback for Marcus Island has not been consistently provided to date, aside from photographic evidence submitted in September 2022. Given the prevailing swell and current direction, minimal aquaculture-related waste has been reported to accumulate on Marcus Island. This has been evidenced within the recent ECO beach inspection monitoring conducted during the reporting period (see below).

Opportunistic visual inspections were conducted by the previously appointed ECO from a vessel en route to Big Bay during the October and November 2024 site visits. Formal beach inspections were carried out in May 2025 and November 2025.

Table 12. Members of Aquaculture Industry committed to beach monitoring and clean-up as required by EMPr conditions 1 and 2 of Table 7-1.

Responsible Party	Group/Affiliation	Precinct	Beach	Frequency
Wayne Maree	AquaFoods SA	Big Bay	Spreeuwalle – Paradise Beach	Twice a month
Mauritz Viljoen	Ocean Grown Aquaculture	Big Bay	Spreeuwalle – Paradise Beach	Bi-weekly
		Outer Bay North	West and Eastern Beach	Monthly
Vos Pienaar	Imbaza Mussels	Small Bay	Small Bay Northern beaches (Hoedjies Bay to Moss gas)	Weekly
SJ Poggenpoel	Blue Ocean Mussels (BOM)	Small Bay	Marcus Island – Small Bay side	Monthly

The ECO received beach clean-up data for October 2025 for clean ups from the following operators:

- Ocean Grown Aquaculture - Big Bay (Spreeuwalle) and Outer Bay North (North Bay)
- Imbaza Mussels - Small Bay

The following was noted:

- 36 aquaculture floats were found on beaches located adjacent to Big Bay.
- 0 aquaculture floats were found on beaches adjacent to Small Bay.
- 4 half floats (broken/burst floats) were found on beaches adjacent to Outer Bay North.
- The majority waste type collected on Northern Beach (Small Bay) was noted to be general litter with ~5% attributed to the aquaculture industry.

Please refer to **Figure 20** to **Figure 23** for photographic evidence.

The ECO noted that records for small bay lacked information pertaining to location, photographic evidence and date of beach inspections. Additionally, the ECO advises that “before” and “after” images should always be taken to ensure proper documentation of the site conditions prior to cleanup activities. It is noted that no beach cleanup information was received for Marcus Island or the TNPA port breakwater area

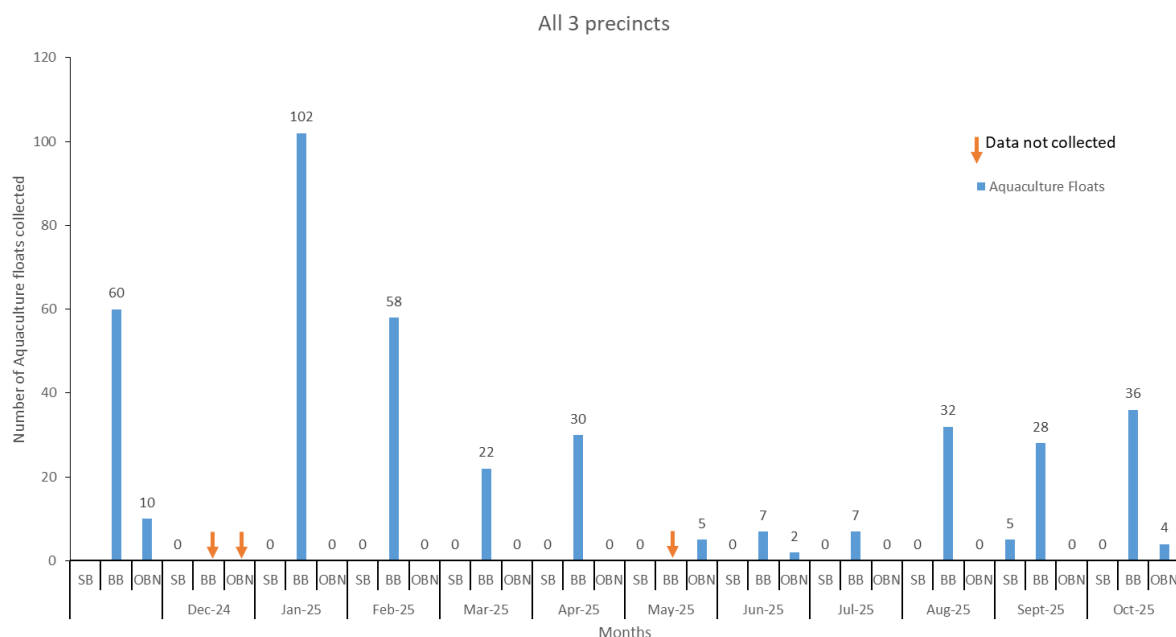


Figure 2. Floats collected from beaches in various precincts. Orange arrows indicate absence of reporting.

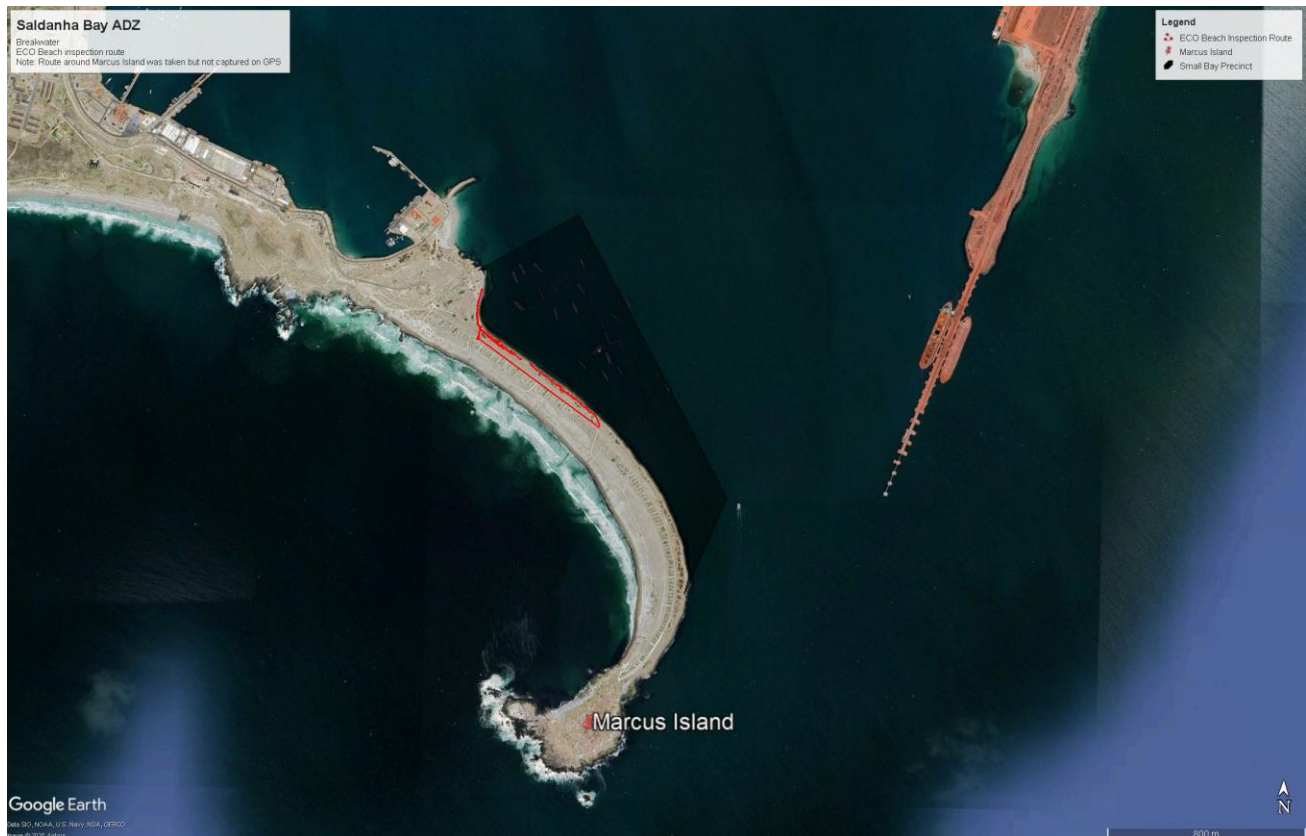
5.2 Beach Monitoring by the ECO

The ECO conducted spot beach inspections at Marcus Island and the TNPA breakwater area, adjacent to Small Bay, on the 11th of November 2025. The following observations were made during the inspections:

- No aquaculture infrastructure was observed on the beaches of Marcus Island
- Two grey containers, possibly used for oysters, were noted within the rocks of the breakwater.

- Various rope offcuts were observed within the rocks/shoreline of the breakwater. These included both small and longer rope offcuts.
- Given the location of the breakwater and various types of rope observed, it is not clear to the ECO which wash up is associated with the aquaculture industry and which is associated with the other port activities. However, it is recommended that beach inspections and clean-ups re-commence within this area adjacent to the ADZ.

Please refer to **Figure 24** to **Figure 35** for photographic evidence.



Figures 3. Beach inspection conducted by ECO during November 2025. It is noted that the Marcus Island beach inspection is not recorded on the GPS (created via Strava and Google Earth Pro, 2025)

6 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register. An environmental incident register is in place.

During the reporting period the following is noted:

- No incidents were reported during the November 2025 reporting period.
- On the 10th of September 2025, the 14B south mooring at AquaFoods SA Farm was reported to come loose from a shackle at the block while harvesting of the line was being undertaken. No environmental

damage was observed. The operator initially tied the affected mooring to the adjacent 13b mooring. The ECO has followed up with the relevant operator to confirm if the mooring shackle has been repaired. Feedback is still awaited from the operator.

- On the 17th of October 2025, the ECO was made aware of an oyster line on Lagoon Aqua Farm being observed out of place and bundled up due to the north riser line breaking off. The ECO communicated this with the relevant operator and was advised on the 23rd of October 2025 and the 17th of November 2025 that the Operator is attending to the broken line with a two-week remediation timeframe required to remove the stock and fix the line. The ECO is currently awaiting feedback on the remediation.

No NEMA section 30 environmental incident/s were reported during this audit period.

7 DECOMMISSIONING PLANS

Southern Atlantic Sea Farms and Southern Cross Sea Farms has completed all decommissioning activities within the Outer Bay North precinct. Confirmation of removal of all infrastructure has been received by Ocean Grown Aquaculture on the 03rd of November 2025.

The following farms are currently in various stages of decommissioning (as per communications received on the 03rd of November 2025):

- Southern Atlantic Sea Farms (Big Bay): **Eleven (11)** lines remain in the water and are yet to be removed. Additionally, twenty-two (22) of the 3.2 tons blocks and twenty-two (22) of the 1.2 ton sleeper packs are still required for removal.
- K2019005713 (Big Bay): The submitted Farm Monitoring Report indicates that **six (6)** dormant lines remain in the water. Additionally, fourteen (14) of the 3.2 tons blocks and fourteen (14) of the 1.2 ton sleeper packs are still required for removal.
- K2019005725 (Big Bay): The submitted Farm Monitoring Report indicates that **seven (7)** dormant lines remain in the water. Additionally, fourteen (14) of the 3.2 tons blocks and fourteen (14) of the 1.2 ton sleeper packs are still required for removal.

The ECO has further been advised that the relevant farm operator is currently busy focusing decommissioning and relocation of infrastructure to the following lease areas:

- Saldanha Bay Ocean Company (SBOC) in Big Bay,
- Ocean Grown Aquaculture (previously West Coast Oyster Growers) in Big Bay, and
- West Coast Aquaculture in Small Bay.

All the recovered 3.2T blocks have been used for current line installations. For all future line installations operators will be casting new mooring blocks (6 Tons).

8 FARM MONITORING REPORTS

All aquaculture operators are required to complete and submit Farm Monitoring Reports ("**FMRs**") by the 15th of each month for the preceding reporting period. Each submission must be accompanied by supporting verification documentation (such as invoices or other records) to confirm production figures.

A separate FMR is required for each farmed product and for every precinct in which an operator is active. Accordingly, the feedback presented below reflects the total number of FMRs submitted across the various precincts and product types.

As of the 25th of November 2025, a total of 19 Farm Monitoring Reports were received on time, one was late, with none outstanding. Two lease areas reported no sales and 17 lease areas had no activity due to either being decommissioned (or in the process thereof) or never commencing with activities.

Note: In respect of Table 13 below, lease areas where marine rights have been revoked or denied, or where no infrastructure is present in the water, have been removed from the table.

Table 13. FMR submission status, supporting production - verification documents and visual inspection logs. Late submissions, lack of supporting documents and not providing visual logs are highlighted in red.

Farm Name	Location	Species	Date	Supporting Documentation	Visual Inspection Log	Notes
African Olive Trading	Small Bay	Mussels	11/11/2025	Yes	Yes	-
AquaFoods SA	Inner Bay	Mussels Oysters	07/11/2025	Yes	Yes	-
Aquafoods SA	Big Bay	Mussels	No farming activity. Farm has been decommissioned.			
Blue Ocean Mussels	Small Bay	Mussels	21/11/2025	Yes	Yes	No biofouling management undertaken.
Blue Sapphire Pearls	Small Bay	Mussels Oysters	15/11/2025	Yes	Yes	Biofouling management noted in Oyster FMR

Blue Sapphire Pearls	Big Bay	Mussels Oysters	13/11/2025	No farm sales	Farm observations vested in Ocean Grown Aquaculture group.	
Imbaza Mussels	Small Bay	Mussels	14/11/2025	Yes	Yes	-
K2019005713	Big Bay	Mussels	Decommissioning in progress. However, FMR has been received on 13/11/2025.			
K2019005725	Big Bay	Mussels	Decommissioning in progress. However, FMR has been received on 13/11/2025.			
Lagoon Aqua Farm	Big Bay	Oysters	14/11/2025	No farm sales	No	-
Mika Growers	Big Bay	Mussels	13/11/2025	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Molapong	Big Bay	Salmon	No farming activity. Farm has been decommissioned.			
Pluto Mussels and Trading	Big Bay	Mussels	13/11/2025	No	No	-
Saldanha Bay Oyster Company	Small Bay	Oysters	13/11/2025	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Saldanha Bay Oyster Company	Big Bay	Mussels	13/11/2025	Yes		
Salmar Trading	Small Bay	Oysters	09/11/2025	Yes	No	-
Southern Atlantic Sea Farms 2	Big Bay	Mussels	No farming activity. Farm has been decommissioned. However, FMR has been received on 13/11/2025.			
West Coast Aquaculture	Small Bay	Mussels Oysters	13/11/2025	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Ocean Grown Aquaculture	Big Bay	Mussels Oysters	13/11/2025	Yes		
Ocean Grown Aquaculture	Small Bay	Mussels Oysters	13/11/2025	Yes		

9 OPERATOR COMPLIANCE WITH THE EA AND EMPR

As noted above, the ECO audited five aquaculture farms within the Big Bay ADZ Precinct in the November 2025 audit period. The information summarises the inspection observations and interview responses noted.

Blue Sapphire Pearls

- Approved for 8 mussel longlines and 3 oyster longlines.
- 3 mussel longlines observed.
- 1 dormant oyster longline observed.
- All lines were observed taut and properly aligned.
- No excess or loose infrastructure observed.
- Floats are black in colour to minimise visual impact.
- No litter or diesel/oil spills were noted within the farm boundaries.
- Unique identifying markers in the form of white cable ties have been secured to each float.

Please refer to **Figure 18** to **Figure 19** for photographic evidence.

K2019005713 (K13)

- Approved for 11 mussel longlines.
- No farming was observed within this lease area and decommissioning is in process with 6 dormant lines remaining.
- Remainder infrastructure noted to be well marked.
- Floats are observed to be black in colour to limit visual impact.
- All lines were observed taut and properly aligned.
- No excess or loose infrastructure observed.
- No litter or diesel/oil spills were noted within the farm boundaries.

Please refer to **Figure 11** to **Figure 12** for photographic evidence.

K2019005725 (K25)

- Approved for 11 mussel longlines.
- No farming was observed within this lease area and decommissioning is in process with 7 dormant lines remaining.
- Remainder infrastructure noted to be well marked.
- Floats are observed to be black in colour to limit visual impact.

- All lines were observed taut and properly aligned.
- No excess or loose infrastructure observed.
- No litter or diesel/oil spills were noted within the farm boundaries.

Please refer to **Figure 13** to **Figure 14** for photographic evidence.

Mika Growers

- Approved for 14 mussel longlines as per the 14th of October 2025 via the AMC.
- 14 mussel longlines observed.
- All lines were observed taut and properly aligned.
- No excess or loose infrastructure observed.
- Floats are black in colour to minimise visual impact.
- Floats are well marked with Farm name and line sequence number.
- No litter or diesel/oil spills were noted within the farm boundaries.

Please refer to **Figure 5** to **Figure 7** for photographic evidence.

Saldanha Bay Oyster Company

- Approved for 34 mussel longlines.
- 18 mussel longlines observed with 6 lines noted to be dormant.
- All lines were observed taut and properly aligned.
- No excess or loose infrastructure observed.
- Floats are observed to be black in colour to limit visual impact.
- No litter or diesel/oil spills were noted within the farm boundaries.
- Floats are well marked with lease name and line sequence number.
- Unique identifying markers in the form of white cable ties have been secured to each float.
- A copy of the EA and EMPr is noted in soft copy within the shore-side facility.

Please refer to **Figure 8** to **Figure 10** for photographic evidence.

Ocean Grown Aquaculture (previously West Coast Oyster Growers)

- Approved for 21 mussel longlines.
- 13 mussel longlines observed with 4 lines noted to be dormant.
- All lines were observed taut and properly aligned.

- No excess or loose infrastructure observed.
- Floats are observed to be black in colour to limit visual impact.
- Floats are well marked with lease name and line sequence number.
- Unique identifying markers in the form of white cable ties have been secured to each float.
- No litter or diesel/oil spills were noted within the farm boundaries.
- A copy of the EA and EMPr is noted in soft copy within the shore-side facility.

Please refer to **Figure 15** to **Figure 17** for photographic evidence.

9.1 Waste Management

Waste continues to be appropriately managed across the ADZ. General waste is collected and stored in municipal black bins with lids and removed on a weekly basis by the local municipality. In some cases, solid waste is transported directly to the Saldanha Bay Landfill Facility for proper disposal. No solid waste or litter was observed on the Pepper Bay Jetty.

In addition, operators have explored opportunities for the beneficial reuse of biological waste in alternative markets. These initiatives include the potential use of bio-waste materials in road construction and as filtration media in aquaculture and fish-keeping systems.

Records of waste generation and disposal are noted within the monthly FMRs submitted by the ADZ operators to the ECO.

9.2 Audit compliance and Findings

In terms of the findings and results of the **November 2025** ECO audit, the project achieved an overall **99.80%** compliance rating with the conditions of the EAs and EMPrs.

Table 14: November 2025 Audit Compliance

SUMMARY OF RESULTS										
No.	COMPLIANCE WITH:	Compliant	Partially Compliant	Non-Compliant	Not Applicable / Not Audited	Work in Progress	Informative	Number of Conditions	Audit Score	Audit Compliance %
		2	1	0	NA	WiP	INFO			
1	Environmental Authorisation: Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	63	1	0	35	0	12	111	127	99%
2	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Operational Phase	71	0	0	74	2	3	150	142	100%
3	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Decommissioning Phase	11	0	0	0	1	0	12	22	100.0%
4	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Environmental Monitoring and Corrective Action	16	0	0	8	0	0	24	32	100.0%
TOTAL		161	1	0	117	3	15	297	323	99.80%
Total Score		322	1	0	NA	NA	NA			

9.2.1 Minor improvements required

- Beach inspections should target the breakwater area within the TNPA port boundaries
- More accurate beach clean-up data is to be collected with accompanying location and photographs captured.
- All farm incidents are to be documented and closed out as soon as possible with evidence provided to the ECO.

9.2.2 Major improvements required.

- The EA Holder should continue engagements with Transnet National Ports Authority ("TNPA") to ensure 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.

9.2.3 Summary of Compliance with the EA and EMPr

This section provides an overview of the ECO's assessment of compliance with the conditions of the EA and the approved EMPr over the preceding audit periods. Compliance scores and percentages from previous ECO audits are summarised to illustrate trends in environmental performance, highlight areas of consistent adherence, and note intervals requiring improvement.

For context, the conditions assessed by the previous ECO and the current NCC ECO are not directly comparable, as NCC identified a substantially larger set of 297 auditable conditions, whereas the previous ECO assessed only 27; therefore, the figures presented reflect different audit scopes rather than a change in compliance performance.

Table 15. Historic compliance with the EA and EMPr

Audit Date	Total Applicable Conditions	Compliance Percentage (%)	Compliant	Partially Compliant	Non-Compliant	Not Applicable / Not Audited	Work in Progress	Informative
21/01/2025	24	83	20	4	0	3	N/A	N/A
11/02/2025	24	92	22	2	0	3	N/A	N/A
25/03/2025	24	92	22	2	0	3	N/A	N/A
29/04/2025	24	92	22	2	0	3	N/A	N/A
21/05/2025	24	92	22	2	0	3	N/A	N/A
No ECO audits were conducted between June 2025 and September 2025								
14/10/2025	164	95.98%	157	3	3	118	1	15
11/11/2025	165	99.8	161	1	0	117	3	15

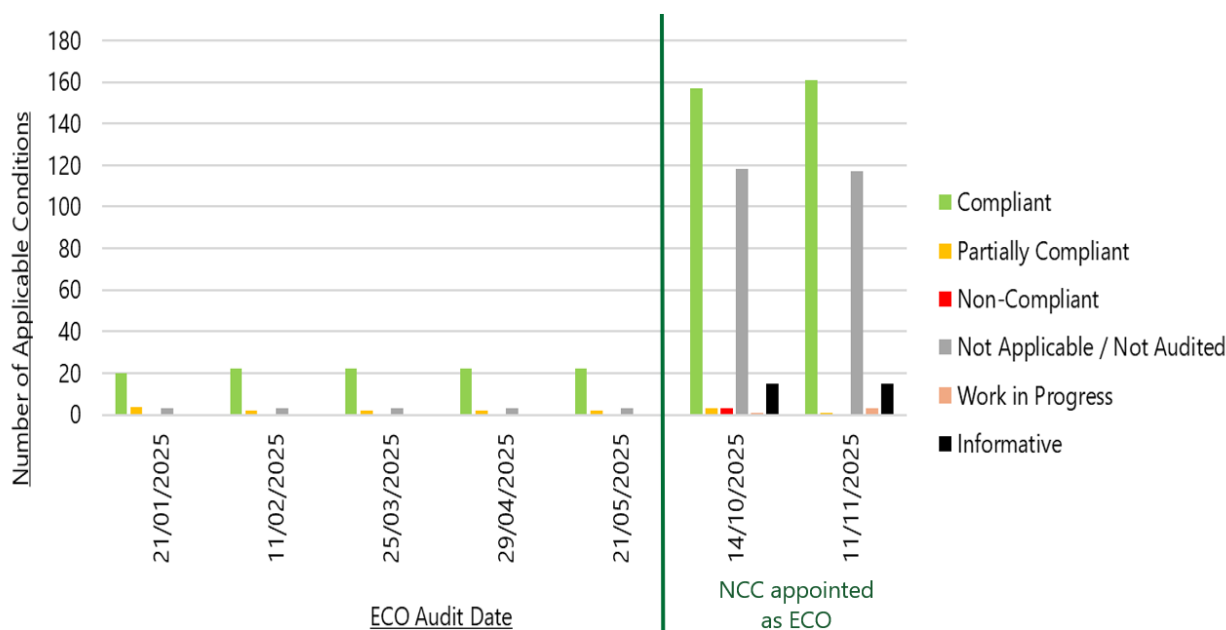


Figure 4. Historic compliance upheld by the Saldanha ADZ

For context, the conditions assessed by the previous ECO and the current NCC ECO are not directly comparable, as NCC identified a substantially larger set of 297 auditable conditions, whereas the previous ECO assessed only 27; therefore, the figures presented reflect different audit scopes rather than a change in compliance performance.

10 RECOMMENDATIONS AND CONCLUSION

10.1 Recommendations

The following recommendations are made by the ECO for the consideration of the DFFE: Fisheries Management

- The EA Holder should continue engagements with Transnet National Ports Authority ("**TNPA**") to ensure 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.
- More accurate beach clean-up data is to be collected with accompanying location and photographs captured.
- All farm incidents are to be documented and closed out as soon as possible with evidence provided to the ECO.
- Beach inspections and clean-ups recommence within Marcus Island and the breakwater area within the TNPA port boundaries.

10.2 Conclusion

NCC Environmental Services (Pty) Ltd was appointed as the Environmental Control Officer for the Saldanha Bay Aquaculture Development Zone for the period 07 October 2025 to 06 February 2026. On the 11th of November 2025, the ECO conducted on-water inspections of six lease areas in Big Bay. No litter or oil spills were observed

during the audit, and all lines were found to be straight and taut. End floats were clearly marked in farm sequence and white cable ties were present as unique identifying markers for the overarching operator.

No incidents were reported during the November 2025 reporting period. However, the ECO requires feedback and status updates on two incidents reported during the October 2025 audit period.

Beach clean-up data for October 2025 was received from Ocean Grown Aquaculture and Imbaza Mussels. A total of 36 floats were collected adjacent to Big Bay, nonadjacent to Small Bay, and four half-floats from Outer Bay North. General litter remained the predominant waste type on Northern Beach, with only a small proportion (~5%) linked to aquaculture activities. However, the Small Bay records submitted lacked key details, including inspection locations, dates and photographic evidence, which limits the completeness and reliability of the dataset.

The ECO noted that in some beach clean-ups photographs were not captured by operator representatives and recommends that these be consistently taken to document site conditions prior to clean-up activities. Additionally, some submissions lacked details regarding location, photographic evidence, and inspection dates, which should be improved in future reporting.

Spot inspections were conducted by the ECO on the 11th of November 2025 at Marcus Island and the breakwater area adjacent to Small Bay. No aquaculture infrastructure was observed along the Marcus Island shoreline. At the breakwater, two grey containers, potentially oyster-related, were found among the rocks, along with several rope offcuts of varying lengths. Due to the mixed-use nature of the area and proximity to port operations, the source of the debris could not be clearly attributed to aquaculture activities. The ECO recommends that regular beach inspections and clean-ups resume in this area adjacent to the ADZ.

As of the 25th of November 2025, a total of 19 Farm Monitoring Reports were submitted on time, one was late, with none outstanding. Two lease areas reported no sales and 17 lease areas had no activity due to either being decommissioned (or in the process thereof) or never commencing with activities.

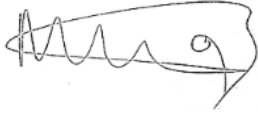
Overall, environmental compliance within the Saldanha Bay ADZ remains high, with operators demonstrating continued commitment to environmental management and reporting. Minor administrative improvements in record-keeping, photographic documentation, and timely submission of FMRs are recommended to further strengthen compliance consistency and environmental performance.

10.3 Evaluation of EMPr

In the opinion of the ECO, no amendments to the EMPr are required at this stage, as the current measures remain adequate to ensure the continued avoidance, management, and mitigation of environmental impacts.

Furthermore, the ECO does not recommend any changes to the EMPr to maintain compliance with the conditions of the EA.

PREPARED BY:

A handwritten signature in black ink, appearing to read 'Michelle Lee', is positioned below the 'PREPARED BY:' heading.

Michelle Lee

M · 072 569 1047

Environmental Control Officer

E · michellel@ncc-group.co.za

NCC Environmental Services (Pty) Ltd

ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	Proposed Corrective Action	Status	Closure status
001	November 2025	The ECO is awaiting feedback on the status of remediation for the incident reported on the 10/09/2025.	Immediately	Advise ECO on status of remediation	Open	TBC

Closed Concerns

No	Observation date	Concern/Complaint	Due Date suggested by ECO	Corrective Action Taken	Outcome	Closure status

ANNEXURE B – PHOTOGRAPHS



Figure 5. Floats observed black in colour and marked with lease name and sequence number.



Figure 6. Floats observed to be in straight lines and well floated.



Figure 7. White cable ties observed as unique identifying marker.

Saldanha Bay Oyster Company



Figure 8. Floats observed black in colour and marked with lease name and sequence number.



Figure 9. Floats observed black in colour and marked with lease name and sequence number.



Figure 10. White cable ties observed as unique identifying marker.

K13



Figure 11. Dormant lines observed black in colour to limit visual disturbance. Floats marked with lease name and sequence number.

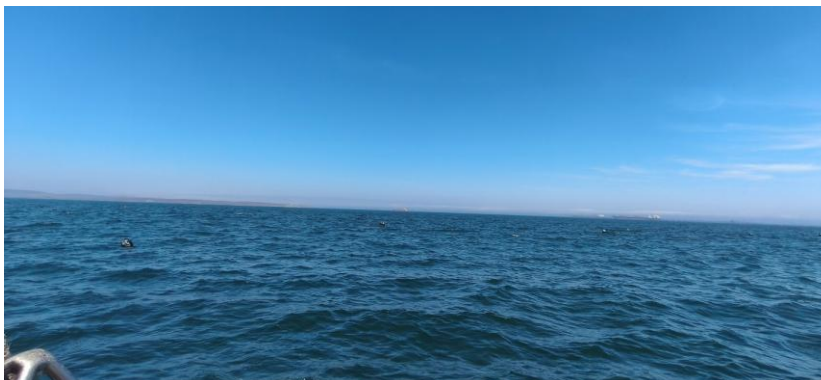


Figure 12. No litter or oil spills observed in the water.

K25



Figure 13. All lines noted to be straight and floated.



Figure 14. Labelling of end floats in lease names and sequence numbers

Ocean Grown Aquaculture (previously West Coast Oyster Growers)



Figure 15. Unique identifying markers observed on end floats.



Figure 16. Lines observed straight and taught.



Figure 17. Floats marked with lease name and sequence number.

Blue Sapphire Pearls



Figure 18. Floats observed black in colour



Figure 19. White cable ties observed as unique identifying marker.

Beach cleanup activities undertaken by ADZ operators

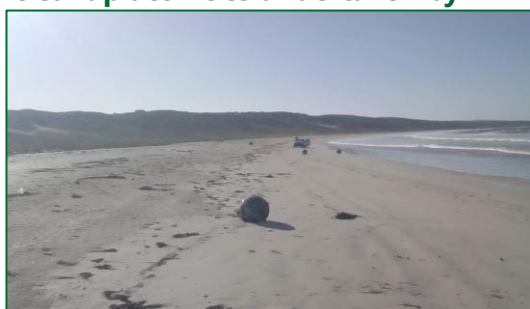


Figure 20. Captured 25/10/2025 - Before

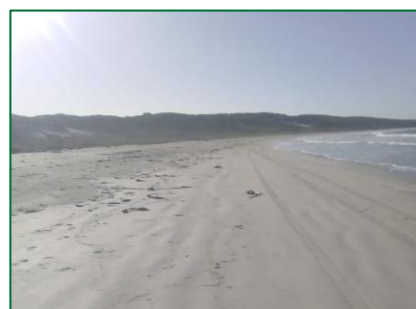


Figure 21. Captured 25/10/2025 - After



Figure 22. Captured 2025/10/22 - Before



Figure 23. Captured 2025/10/22 - After

Beach Inspection undertaken by the ECO



Figure 24. Green rope found along breakwater



Figure 25. Rope offcut found along breakwater



Figure 26 Large rope found along the breakwater



Figure 27. Grey container found along breakwater



Figure 28. Grey container found along breakwater

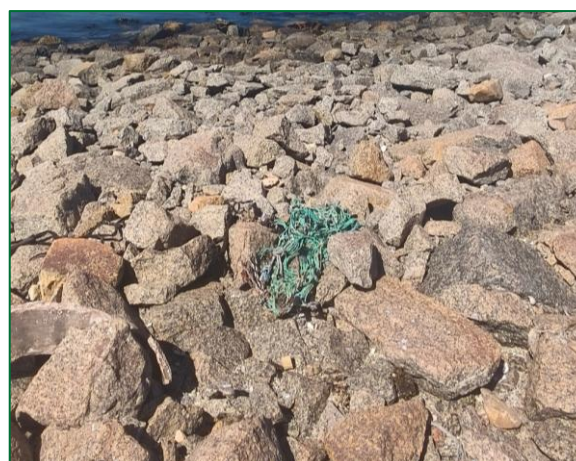


Figure 29. Green netted rope observed at breakwater.



Figure 30. Green rope found along breakwater



Figure 31. Large rope found along the breakwater



Figure 32. Blue rope observed along breakwater



Figure 33. Blue rope observed along breakwater



Figure 34. Oyster basket remnant found along breakwater



Figure 35. Various rope and netting collected by the ECO

SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE

Environmental Control Officer Site Inspection and Farm Monitoring Verification Report

PREPARED FOR:

The Department of Forestry,
Fisheries and the Environment
Branch: Fisheries Management

PREPARED BY:

NCC Environmental Services

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**forestry, fisheries
& the environment**

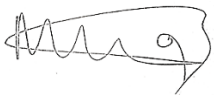
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

DECLARATION OF INDEPENDENCE

Environmental Control Officer

I, Michelle Lee, as duly authorised representative of NCC Environmental Services (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which the Department of Forestry, Fisheries and the Environment ("**DFFE**") has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Michelle Lee', enclosed within a hand-drawn rectangular box.

Michelle Lee

23 December 2025

Environmental Control Officer

NCC Environmental Services (Pty) Ltd

Audit Reviewer

I, Nick Gates, as duly authorised representative of NCC Environmental Services (Pty) Ltd, hereby confirm my independence (as well as that of NCC) as an audit reviewer and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which the Department of Forestry, Fisheries and the Environment has appointed NCC as Environmental Control Officer, other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Nick Gates', consisting of several loops and a trailing line.

Nick Gates

23 December 2025

ECO Line Manager

NCC Environmental Services (Pty) Ltd

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DOCUMENT CONTROL

REPORT TITLE	Environmental Control Officer Site Inspection and Farm Monitoring Verification Report - #41
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ECO	NCC Environmental Services (Pty) Ltd
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DATE	15 January 2025

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Rev 01	15/01/2025	Final - Authority submission

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Michelle Pretorius	DFFE	23/12/2025	Electronic
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Saldanha Bay ADZ Management Committee		15/01/2025	Electronic
Director of Compliance	DFFE	15/01/2025	Electronic

TABLE OF CONTENTS

ABBREVIATIONS	8
1 INTRODUCTION	9
1.1 AUDIT SCOPE AND PURPOSE.....	10
1.2 ASSUMPTIONS AND LIMITATIONS.....	11
1.3 COMPLIANCE WITH REGULATION 34 OF THE EIA REGULATIONS, 2014 (AS AMENDED).....	11
1.4 MONITORING FREQUENCY AND REPORTING.....	13
2 PROJECT TEAM.....	14
3 AUDIT APPROACH	16
3.1 GENERAL APPROACH.....	16
3.2 AUDIT TABLES AND COMPLIANCE RATINGS	16
3.3 SITE INSPECTIONS	17
3.4 CONSULTATIONS AND COMMUNICATIONS	19
3.4.1 Consultations.....	19
3.4.2 Communications.....	20
4 GENERAL (NOTABLE EVENTS).....	21
4.1 GENERAL OUTSTANDING MATTERS.....	21
4.2 CHANGE IN INFRASTRUCTURE	21
4.2.1 Saldanha Bay Oyster Company – Pilot Oyster Stacks.....	21
4.2.2 Ocean Grown Aquaculture (Big Bay) – Movement of Lines.....	21
4.3 FARM MAINTENANCE PLAN FEEDBACK.....	22
4.4 CONSERVATION OF FAUNA	22
5 BEACH INSPECTIONS.....	24
5.1 BEACH MONITORING BY OPERATORS	24
5.2 BEACH MONITORING BY THE ECO	26
6 INCIDENTS AND ACCIDENTS	27
7 DECOMMISSIONING PLANS	28
7.1 UPDATE ON SECTION 28(3)(C) PROCESSES	29
8 FARM MONITORING REPORTS	30
9 OPERATOR COMPLIANCE WITH THE EA AND EMPR.....	32
9.1 WASTE MANAGEMENT.....	33
9.2 AUDIT COMPLIANCE AND FINDINGS.....	33
9.2.1 Minor improvements required.....	34
9.2.2 Major improvements required.....	35
9.2.3 Summary of Compliance with the EA and EMPr.....	35
10 RECOMMENDATIONS AND CONCLUSION	36
10.1 RECOMMENDATIONS.....	36
10.2 CONCLUSION.....	37
10.3 EVALUATION OF EMPR.....	38
ANNEXURE A – CONCERNS/COMPLAINTS REGISTER	39
ANNEXURE B – PHOTOGRAPHS	40

LIST OF FIGURES

Figure 1. Locality map of ECO on-water inspection route with farms audited noted (created via Google Earth Pro, 2025).....	18
Figure 2. Floats collected from beaches in various precincts. Orange arrows indicate absence of reporting.	26
Figures 3. Beach inspection conducted by ECO during December 2025 noted in red. (created via Strava and Google Earth Pro, 2025).....	27
Figure 4. Historic compliance upheld by the Saldanha ADZ.....	36
Figure 5. Seaweed longline with all buoys marked according to lease name. Buoys black in colour to limit visual impact.....	41
Figure 6. Rafts placed in arrangement of 3 or 4 per line. All droppers noted to be straight and well attached to raft. Raft labelled according to lease name and sequence number.....	41
Figure 7. Service barge noted to be free of equipment and waste. No loose infrastructure observed.	41
Figure 8. Rafts well-spaced from one another. All droppers observed in straight alignment. No bright colours observed.....	42
Figure 9. No loose infrastructure observed. No equipment noted on rafts.....	42
Figure 10. Rafts labelled according to lease area (IM).....	42
Figure 11. Rafts placed in arrangement of 3 or 4 per line. All droppers noted to be straight and well attached to raft. Raft labelled according to lease name and sequence number.....	43
Figure 12. Droppers noted to be straight and well attached to rafts.....	43
Figure 13. Longline floats noted to be painted with lease name. Paint noted to have washed away on several floats.	43
Figure 14. Seeding of mussel raft observed.....	43
Figure 15. Captured 06/11/2025 - Before.....	44
Figure 16. Captured 06/11/2025 - After.....	44
Figure 17. Captured 14/11/2025 - Before.....	44
Figure 18. Captured 14/11/2025 - After.....	44
Figure 19. Captured 19/11/2025 - After.....	44
Figure 20. Captured 27/11/2025 - Before.....	44
Figure 21. Captured 28/11/2025 - Before.....	45
Figure 22. Captured 28/11/2025 - After.....	45
Figure 23. Captured 28/11/2025 - After.....	45
Figure 24. Rope found within rocks on beachfront.	46
Figure 25. Rope offcut found along beachfront.....	46
Figure 26. SBOC buoy observed between rocks.	46
Figure 27. Rope offcut observed between rocks.....	46
Figure 28. Unmarked black buoy wedged in rocks.....	46
Figure 29. Yellow buoy observed under rockface.....	46
Figure 30. Unmarked black buoy wedged in rocks.....	46
Figure 31. Unmarked black buoy wedged in rocks.....	46
Figure 32. Unmarked black buoy wedged in rocks.....	47
Figure 33. Unmarked black buoy wedged in rocks.....	47
Figure 34. Rope offcut observed on beachfront.	47
Figure 35. Rope offcut observed on beachfront.....	47
Figure 36. Plastic netting wedged in between rocks.	47

LIST OF TABLES

Table 1: Summary of environmental requirements / criteria relating to the overall project.....	10
Table 2. Legal requirements for Audit Reports as per Appendix 7 of the EIA Regulations, 2014 (as amended). 12	
Table 3. Line Manager Details.....	14

Table 4. Lead ECO Details	14
Table 5. Secretariat and support details	15
Table 6: Compliance rating and scoring	17
Table 7. Saldanha Bay ADZ Farm Inspection Schedule. Grey blocks indicate farms that have had no farming activity or infrastructure in the water.....	18
Table 8. Communications received by the ECO during the audit period	20
Table 9. Precinct observations verified for November 2025.....	22
Table 10. Faunal Observations made within the Saldanha Bay ADZ by Ocean Grown Aquaculture from 03/11/2025 to 28/11/2025.....	24
Table 11. Faunal Observations made within the Saldanha Bay ADZ by Imbaza Mussels from the 03/11/2025 to the 28/11/2025.....	24
Table 12. Members of Aquaculture Industry committed to beach monitoring and clean-up as required by EMPr conditions 1 and 2 of Table 7-1.....	25
Table 13. Status of Section 28(3)(c) processes for the Saldanha Bay ADZ.....	29
Table 14. FMR submission status, supporting production - verification documents and visual inspection logs. Late submissions, lack of supporting documents and not providing visual logs are highlighted in red.	30
Table 15: December 2025 Audit Compliance	34
Table 16. Historic compliance with the EA and EMPr	35

ABBREVIATIONS

ADZ	Aquaculture Development Zone
AMC	ADZ Management Committee
BAR	Basic Assessment Report
BSASA	Bivalve Shellfish Association of South Africa
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ER	Employer's Representative
ETP	Endangered, threatened and protected
FMR	Farm Monitoring Reports
I&APs	Interested and Affected Parties
IAIASA	International Association for Impact Assessment South Africa
MLRA	Marine Living Resources Act, 1998 (Act No. 18 of 1998)
MLRF	Marine Living Resources Fund
NCC	NCC Environmental Services (Pty) Ltd
NCR	Non-Compliance Report
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
SAMSA	South African Marine Safety Authority
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SHERQ	Safety Health Environment Risk & Quality.
TBC	To Be Confirmed
TNPA	Transnet National Ports Authority

1 INTRODUCTION

The Department of Forestry, Fisheries and the Environment (“**DFFE**”), through the Marine Living Resources Fund (“**MLRF**”), has established a sea-based Aquaculture Development Zone (“**ADZ**”) within Saldanha Bay, Western Cape, to promote sustainable marine aquaculture and support economic development in the coastal region. In accordance with the Environmental Authorisation (“**EA**”) and the Environmental Management Programme (“**EMPr**”) issued for the ADZ, the appointment of an independent Environmental Control Officer (“**ECO**”) is a regulatory requirement to ensure environmental compliance and the responsible execution of aquaculture operations.

NCC Environmental Services (Pty) Ltd (“**NCC**”) has been appointed by the DFFE to provide suitably experienced independent ECO services for the Saldanha Bay sea-based ADZ in compliance with the conditions stipulated in the EA and EMPr for a contract period of four (**4**) months from 07 October 2025 to 06 February 2026.

The Saldanha Bay ADZ commenced with operations in **February 2019**.

Ongoing complaints have been received from members of the public regarding debris originating from aquaculture operations washing ashore along public beaches. Reported debris typically includes crates, ropes, baskets, and floats, which are often biofouled and decomposing, resulting in unpleasant odours and attracting flies. Such occurrences are contrary to the requirements outlined in the ADZ EMPr and the individual farm EMPrs.

In response, minimum infrastructure requirements have been established, in consultation with the industry, to strengthen waste management practices and reduce debris generation. These guidelines also serve to align farm operations with the production limits prescribed in the EMPr and EA. While it is recognised that complete prevention of infrastructure loss is impractical, aquaculture operators and the Bivalve Shellfish Association of South Africa (“**BSASA**”) conduct regular beach inspections and clean-ups, often addressing debris unrelated to aquaculture activities.

Although these clean-up efforts have proven largely effective, the ADZ continues to prioritise the reduction of debris generation and the identification of operators who fail to adequately maintain farm infrastructure. Poor maintenance not only increases debris accumulation but also negatively impacts the reputation of the entire ADZ. Accordingly, operators are required to mark their infrastructure with unique identifiers and to ensure ongoing maintenance to minimise the risk of breakage and loss, as stipulated in the EMPr.

Currently, **two** (2) aquaculture operators have committed to monitoring and cleaning the primary receiving beaches for aquaculture-related debris. Evidence of these activities, including photographic records and waste data, is submitted to the ECO monthly. Furthermore, recognising the importance of accurate production data for assessing potential environmental impacts within the Saldanha Bay system, the ADZ Management

Committee (“**AMC**”) has directed that monthly ECO audits include verification of production figures. To this end, operators submit monthly Farm Monitoring Reports (“**FMRs**”) with supporting documentation to enable cross-verification of reported sales and production data.

The ECO plays a critical role in monitoring and reporting on adherence to the stipulated environmental conditions, identifying potential risks, recommending corrective actions, and maintaining transparent communication between the MLRF, aquaculture operators, and relevant stakeholders.

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

Table 1: Summary of environmental requirements / criteria relating to the overall project.

Components of overall project	Environmental requirements / criteria			
	EA		EMPr	
	DFFE EA Ref No.	Issue date	Author	Date Compiled
Environmental Authorisation: Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	14/12/16/3/3/1/1728	08/01/2018	SRK	January 2018
Amendment of Environmental Authorisation issued on 08 January 2018 for the Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	14/12/16/3/3/1/1728/AM1	10/07/2019		
	14/12/16/3/3/1/1728/AM2	16/09/2020		
	14/12/16/3/3/1/1728/AM3	02/05/2024		

1.1 Audit Scope and Purpose

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and

- b) Submit an environmental audit report to the relevant competent authority.

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPs, and report on the extent to which the objectives of the EMPs and are being achieved.

1.2 Assumptions and Limitations

The compliance audit and report are based upon the assumptions that:

- i. All information received from the DFFE, their representatives and the aquaculture operators in the ADZ on which this audit report is based, is accurate and correct.
- ii. Evidence provided through interviews was factual and true.
- iii. No public consultation was undertaken as part of this ECO audit. In the opinion of the ECO, this was not required for the purposes of conducting the monthly site inspection audit.
- iv. A change of ECO has occurred during the operational phase of the ADZ. This was noted within the previous ECO monitoring reports submitted to the DFFE as well as the internal ECO handover report.
- v. The ECO had access to all the information necessary to compile this audit report. There are no gaps in knowledge that would suggest any level of uncertainty in the findings of the auditor.
- vi. The audit is based purely on the conditions as stipulated in the ADZ EA's, EMP's.
- vii. Where visual observations of equipment or infrastructure were not possible either due to the location or complexity to access the auditor has used other means to determine compliance, either through written evidence from operators or through interviews.
- viii. Note that NCC Environmental Services (Pty) Ltd are indemnified against any claim for damages that may result from this report and its recommendations.

1.3 Compliance With Regulation 34 of the EIA Regulations, 2014 (As Amended)

The National Environmental Management Act, 1998 (Act No. 107 of 1998) ("**NEMA**") provides the overarching framework for co-operative environmental governance in South Africa. In accordance with Sections 24(5) and 44 of NEMA, the Environmental Impact Assessment ("**EIA**") Regulations, 2014 (as amended), serve as the principal regulatory mechanism for managing and mitigating potential environmental impacts arising from listed activities and new developments.

NCC conducts environmental audits in terms of Regulation 34 of the EIA Regulations (as amended). The following should be noted in this regard:

- The audit reports prepared by NCC assess both compliance with, and the adequacy of, the approved EMPr.
- NCC's role does not extend to ensuring compliance with all other provisions of Regulation 34, such as initiating amendments to the EMPr or associated licences and permits and informing Interested and Affected Parties ("I&APs"). The responsibility for ensuring full compliance with applicable environmental authorisations and legislative requirements rests with the project proponent.
- Appendix 7 of the NEMA 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.

Table 2. Legal requirements for Audit Reports as per Appendix 7 of the EIA Regulations, 2014 (as amended).

Requirement	Report Section Reference
The environmental audit report must provide for recommendations regarding the need to amend the EMPr and the closure plan in the case of a closure activity.	Section 10
2. The objective of the environmental audit report is to- (a) report on- (i) the level of compliance with the conditions of the environmental authorisation and the EMPr and the closure plan in the case of a closure activity; and (ii) the extent to which the avoidance, management and mitigation measures provided for in the EMPr and closure plan achieve the objectives and outcomes of the EMPr and closure plan;	Section 5 - Section 10
2(b) identify and assess any new impacts and risks as a result of undertaking the activity;	Section 10
2(c) evaluate the effectiveness of the EMPr, and the closure plan in the case of a closure activity;	Section 10
2(d) identify shortcomings in the EMPr, and the closure plan in the case of a closure activity; and	Section 10
(e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and the closure plan in the case of a closure activity.	Section 5 – Section 10
(1) An environmental audit report prepared in terms of these Regulations must contain-	N/A
(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.	Section 2
(b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Page 2
(c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Section 1.1
(d) A description of the methodology adopted in preparing the environmental audit report.	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	Section 5 – Section 10

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, EMP, and where applicable, the closure plan.	
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge	Section 1.2
(g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Section 3.4
(h) A summary and copies of any comments that were received during any consultation process.	Section 3.4
(i) Any other information requested by the competent authority.	N/A

1.4 Monitoring Frequency and Reporting

The monitoring and reporting frequency by the ECO are monthly. In terms of this monitoring report, site inspections were undertaken on the **18th of December 2025** after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit.

This report details the activities and compliance demonstrated for the Saldanha Bay ADZ (EA: 14/12/16/3/3/1/1728, 14/12/16/3/3/1/1728/AM1, 14/12/16/3/3/1/1728/AM2 and 14/12/16/3/3/1/1728/AM3) only. This report covers the monthly reporting for the month of December 2025.

2 PROJECT TEAM

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

Our project team is composed of seasoned environmental professionals with extensive experience in environmental compliance monitoring. The project will be overseen by a dedicated Line Manager who will provide strategic oversight and quality assurance throughout the duration of the contract. Day-to-day implementation will be led by our appointed Lead ECO, who will be responsible for conducting all site inspections, monitoring activities, stakeholder engagement, and the preparation of monthly and final compliance reports in alignment with the tender scope requirements.

This team structure ensures both high-level oversight and operational efficiency, enabling us to deliver a responsive and technically sound service that meets the expectations of the DFFE and MLRF.

Table 3. Line Manager Details

PERSONAL DETAILS	
Name	Nicholas Anthony Gates
Profession	Service Line Manager: Environmental Management Consulting
QUALIFICATIONS	
Tertiary Education	
Bachelor of Social Science: Environmental and Geographical Sciences <i>University of Cape Town, 2007</i>	
Accreditation and Memberships	
- Environmental Assessment Practitioners Association of South Africa, <i>Registered EAP No. 2022/4508</i> - The Institute of Waste Management of South Africa, <i>Registration No. 30116139</i> - International Association of Impact Assessment South Africa, <i>Registration No. 5535</i> - Environmental Law Association: <i>Registration No. 2018/198/WC</i>	

Table 4. Lead ECO Details

PERSONAL DETAILS	
Name	Michelle Lee
Profession	Environmental Consultant and Environmental Control Officer
QUALIFICATIONS	
Tertiary Education	
BSc Hon Marine Biology <i>University of Cape Town</i>	

BSc Applied Biology, Ecology and Evolution, Marine Biology <i>University of Cape Town</i>
Accreditation and Memberships
The Environmental Assessment Practitioners Association of South Africa: Candidate EAP 2021/4150

Table 5. Secretariat and support details

PERSONAL DETAILS	
Name	Luke Saunders
Profession	Environmental Consultant
QUALIFICATIONS	
Tertiary Education	
BSocSci. Environmental & Geographical Science <i>University of Cape Town, 2019</i> BSc Hons. Environmental Management (in progress) <i>University of South Africa, 2025</i>	
Accreditation and Memberships	
International Association for Impact Assessment South Africa (IAIAsa): Membership No 7453 Environmental Impact Practitioners Association of South Africa (EAPASA): Candidate EAP 2024/8897	

3 AUDIT APPROACH

3.1 General Approach

The ECO conducts monthly visual inspections of selected farms within the Saldanha Bay ADZ, utilising a vessel provided by one of the operators. Photographs are captured during these inspections to serve as evidence of compliance (**Annexure B**). In addition, the ECO inspects specific beaches surrounding the ADZ to identify any aquaculture-related debris that may have washed ashore.

During farm inspections, the following elements are verified in accordance with the EA, associated guidelines, and the approved EMPr:

- Number of lines or rafts in operation.
- All lines are taut and properly aligned.
- Floats are muted in colour to minimise visual impact.
- Absence of litter on barges or rafts.
- No oil or fuel slicks present around working boats.
- Unique identifying markers are present on all infrastructure.
- No excess or loose equipment on rafts or barges.
- Vessels are noted to be in good working order.

3.2 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs during the reporting period. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 6** below.

Table 6: Compliance rating and scoring.

Status	Scoring	Description
Compliant	2	<i>No improvements required</i>
Partially Compliant	1	<i>Minor improvements required</i>
Non-Compliant	0	<i>Major improvements required</i>
Work In Progress	WiP	<i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>
Not Applicable / Not Audited	NA	<i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit.</i>
Informative	INFO	<i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria.</i>

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), non-compliant (red), Work in Progress (salmon), Not Auditable/Audited (grey) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the latter three audit status symbols, namely 'WiP', 'NA' and 'INFO' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

3.3 Site Inspections

The Saldanha Bay ADZ comprises **seventeen (17) lease areas** distributed across **three precincts**. To ensure that all farms are inspected by the ECO within an annual cycle, a subset of two to five farms are typically selected for inspection each month.

The farm inspection schedule for the period spanning from February 2025 is provided in **Table 7** below. The monthly ECO site inspection for December 2025 was conducted on the **18th of December 2025** at three lease areas in Small Bay. The following farms/lease areas were inspected during the current audit period:

- African Olive Traders,
- Imbaza Mussels, and
- Blue Ocean Mussels.

All farms audited included an on-water inspection coupled with a verbal interview.



Figure 1. Locality map of ECO on-water inspection route with farms audited noted (created via Google Earth Pro, 2025)

Table 7. Saldanha Bay ADZ Farm Inspection Schedule. Grey blocks indicate farms that have had no farming activity or infrastructure in the water.

Farm Name	Location	Species	ECO Audits						
			February 2025	March 2025	April 2025	May 2025	October 2025	November 2025	December 2025
African Olive Trading	Small Bay	Mussels		X					X
AquaFoods SA	Small Bay	Mussels Oysters				X			
Blue Ocean Mussels	Small Bay	Mussels	X						X
Blue Sapphire Pearls	Small Bay	Mussels Oysters				X	X		
Imbaza Mussels	Small Bay	Mussels	X						X
Saldanha Bay Oyster Company	Small Bay	Oysters					X		
Salmar Trading	Small Bay	Oysters					X		
West Coast Aquaculture	Small Bay	Mussels Oysters					X		
Ocean Grown Aquaculture	Small Bay	Mussels Oysters			X		X		
AquaFoods SA	Big Bay	Mussels							

Blue Sapphire Pearls	Big Bay	Mussels Oysters						X	
K2019005713	Big Bay	Mussels						X	
K2019005725	Big Bay	Mussels						X	
Lagoon Aqua Farm	Big Bay	Oysters							
Madima General Agriculture Trading	Big Bay	Mussels			X				
Mika Growers	Big Bay	Mussels			X			X	
Pluto Mussels and Trading	Big Bay	Mussels			X				
Saldanha Bay Oyster Company	Big Bay	Oysters						X	
Ocean Grown Aquaculture	Big Bay	Mussels Oysters						X	

Please note: ECO inspections conducted from February 2025 to May 2025 were audited by the previously appointed ECO (*Anchor Research & Monitoring (Pty) Ltd*). Additionally, NCC has been advised that due to a delay in appointment processes, no ECO was appointed between the June 2025 and September 2025 period, however an oversight role was performed by the DFFE project team during this period.

Additionally, in respect of Table 7 above, lease areas where marine rights have been revoked or denied, or where no infrastructure is present in the water, have been removed from the table.

3.4 Consultations and Communications

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor, the Proponent, ADZ farm operators and relevant stakeholders which also includes communication with the competent authority (“CA”) in terms of report submission.

3.4.1 Consultations

The following consultations were undertaken during the audit period:

- 24th of November 2025 – AMC meeting was conducted online.
- 18th of December 2025 – Consultation was held with aquaculture operators in the ADZ of the following lease areas and their representatives, followed by an on-water inspection:
 - African Olive Traders,
 - Imbaza Mussels, and
 - Blue Ocean Mussels.

- 11th of December 2025 to the 23rd of December 2025 - Farm Monitoring Reports were received from the various aquaculture operators in the ADZ.

Please note that no information was requested by the CA during the audit period.

3.4.2 Communications

Communications received by the Saldanha Bay ADZ ECO during the audit period (December 2025) are summarised in **Table 8** below.

Table 8. Communications received by the ECO during the audit period

Individual	Organisation	Subject
Marius Jooste	Gainmaker	RE: Pluto Request for approval of 3 additional lines on top of 11 lines approved:
Marizann Steyn	Aquafoods SA	Re: Aqua Food SA Oct 2025 reporting
Mauritz Viljoen	Saldanha Bay Oyster Company	Oysters on SBOC Big Bay farm
Mayizole Majangaza	DFFE: Acting Environmental Officer Control Grade A: Aquaculture Authorisations	Section 28(3)(c) of the MLRA: Saldanha Bay Aquaculture Development Zone (ADZ) (Finalised)
Portia Dwane	DFFE: Directorate: Sustainable Aquaculture Management	Small Bay- PST above threshold limit
Portia Dwane	DFFE: Directorate: Sustainable Aquaculture Management	Small Bay farms- Revert to routine sampling

4 GENERAL (NOTABLE EVENTS)

4.1 General Outstanding Matters

Any matters of concern or outstanding matters are to be recorded and summarised in the Communications Register (**Annexure A**).

The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

There is one outstanding concern raised for this audit period pertaining to the close out of an incident recorded in the October 2025 reporting period.

4.2 Change in Infrastructure

4.2.1 Saldanha Bay Oyster Company – Pilot Oyster Stacks

On the 08th of December 2025, Saldanha Bay Oyster Company (SBOC) notified the ECO that installation of the recently approved aquaculture lines within its lease area is ongoing, with 23 of the 34 authorised lines already installed. To assess oyster growth performance in Big Bay relative to Inner Bay, SBOC initiated a small-scale trial involving the placement of 43 oyster stacks on an existing mussel line, intended to remain in place for approximately four weeks.

However, the installation of the oyster stacks was undertaken without prior notification to the ECO and without approval from the AMC or the DFFE.

In terms of the Environmental Authorisation (EA) for the Saldanha Bay Aquaculture Development Zone (ADZ) and the approved Environmental Management Programme (EMPr), the ECO must be notified at least two weeks prior to any changes to infrastructure. This requirement ensures effective monitoring of infrastructure, compliance with production thresholds, and adherence to EA conditions.

The ECO accordingly noted that SBOC was in contravention of the conditions of the EA and the approved EMPr due to failure to provide prior notification. Furthermore, this non-compliance was noted to not be an isolated incident, with a similar contravention previously recorded at the Ocean Grown Aquaculture farm in January 2025.

A letter of non-compliance was issued to SBOC on the 23rd of December 2025 by the ECO.

4.2.2 Ocean Grown Aquaculture (Big Bay) – Movement of Lines

Aquaculture infrastructure, consisting of top ropes, mooring blocks and risers, was moved into the Ocean Grown Aquaculture Big Bay lease area during November 2025. The infrastructure was newly deployed and not transferred from another farm. Installation activities took place on 17 November 2025 (three installations), 18

November 2025, and 24 November 2025, and were associated with lines 17, 18, 19, 20 and 21 at the destination farm.

Aquaculture infrastructure, comprising top ropes, mooring blocks and risers, was moved into the Saldanha Bay Oyster Company Big Bay lease area during November 2025. The infrastructure was newly deployed and not transferred from another farm. Installation occurred on the 08th, 25th, 26th, 27th and the 28th of November 2025, and was associated with lines 2, 3, 4, 5 and 6 at the destination farm.

Additionally, aquaculture infrastructure consisting of top ropes, mooring blocks and risers was moved into the West Coast Aquaculture Small Bay lease area. The infrastructure was transferred from the Southern Cross Sea Farm (3.2-ton and 1.2-ton blocks). Installation activities took place on the 01st of November 2025, 05th of November 2025 (two installations) and the 08th of November 2025, and were associated with lines 27, 28, 29 and 30 at the destination farm.

4.3 Farm Maintenance Plan Feedback

No updates to note during this reporting period.

4.4 Conservation of Fauna

In accordance with the approved EMPr, aquaculture operators are required to conduct daily visual observations to monitor potential interactions between marine animals and farm infrastructure. These observations are undertaken either from vessels during weekdays or from shore using binoculars (typically on weekends and public holidays when boats are not operating on the farms).

Operators submit visual observation logs to the ECO monthly to verify that all three precincts within the ADZ have been adequately monitored.

The data presented in **Table 9** below reflects the information submitted for the month preceding the reporting period.

Table 9. Precinct observations verified for November 2025.

Date	ADZ Precinct		
	Small Bay	Big Bay	North Bay
01/11/2025	✓	✓	✓
02/11/2025	✓	✓	✓
03/11/2025	✓	✓	✓
04/11/2025	✓	✓	✓
05/11/2025	✓	✓	✓
06/11/2025	✓	✓	✓
07/11/2025	✓	✓	✓

08/11/2025	✓	✓	✓
09/11/2025	✓	✓	✓
10/11/2025	✓	✓	✓
11/11/2025	✓	✓	✓
12/11/2025	✓	✓	✓
13/11/2025	✓	✓	No observations has been conducted by the aquaculture operators in the ADZ for North Bay from the 12/11/2025 onwards.
14/11/2025	✓	✓	
15/11/2025	✓	✓	
16/11/2025	✓	✓	
17/11/2025	✓	✓	
18/11/2025	✓	✓	
19/11/2025	✓	✓	
20/11/2025	✓	✓	
21/11/2025	✓	✓	
22/11/2025	✓	✓	
23/11/2025	✓	✓	
24/11/2025	✓	✓	
25/11/2025	✓	✓	
26/11/2025	✓	✓	
27/11/2025	✓	✓	
28/11/2025	✓	✓	
29/11/2025	✓	✓	
30/11/2025	✓	✓	

Operators are required to record and report any sightings of marine fauna, including endangered, threatened, or protected (“ETP”) species, as part of their routine monitoring. These observations are submitted to the ECO on a monthly basis to ensure that all precincts are effectively monitored and potential impacts on marine wildlife are documented.

During the month of **December 2025**, the following aquaculture operators in the ADZ submitted faunal observations recorded to the ECO:

- Ocean Grown Aquaculture; and
- Imbaza Mussels

Table 10 and **Table 11** below provide a summary of the observations provided per precinct.

Table 10. Faunal Observations made within the Saldanha Bay ADZ by Ocean Grown Aquaculture from 03/11/2025 to 28/11/2025

Faunal Species	Number of Observations within Saldanha Bay ADZ Precinct			
	Small Bay	Big Bay	Outer Bay North	Quay
Common Dolphin		14		
Cape Fur Seal	23	15		
Cape Ganet	4	>80		
African Penguin		5		
Oyster Catcher	2			

Table 11. Faunal Observations made within the Saldanha Bay ADZ by Imbaza Mussels from the 03/11/2025 to the 28/11/2025

Faunal Species	Number of Observations within Saldanha Bay ADZ Precinct			
	Small Bay	Big Bay	Outer Bay North	Outer Bay South
Common Dolphin		N/A		
Cape Fur Seal	27			
Cormorant, Cape	83			
Cape Ganet				
African Penguin				
Gull, Kelp	270			
Gull, Hartlaub's	134			
Oyster Catcher	38			

Note: It is noted that the above records represent a cumulative count of individuals observed during the reporting period. As such, this figure is unlikely to reflect the total number of unique individuals recorded for the month, as some may have been counted repeatedly on different days

5 BEACH INSPECTIONS

5.1 Beach Monitoring by Operators

Through the BSASA, four members of the aquaculture industry have committed to conducting regular beach monitoring and clean-ups across the three precincts of the ADZ, namely Small Bay, Big Bay, and Outer Bay North, effective from 8 September 2022.

The ECO provides a standardised feedback template to participating operators to record waste volume estimates, dominant waste types, and the proportion of waste attributable to aquaculture debris. Beach clean-up feedback is submitted the following month to ensure that data reflects a full month's collection period.

While comprehensive waste data is routinely received for Small Bay, Big Bay, and Outer Bay North, detailed feedback for Marcus Island has not been consistently provided to date, aside from photographic evidence submitted in September 2022. Given the prevailing swell and current direction, minimal aquaculture-related waste has been reported to accumulate on Marcus Island. This has been evidenced within the recent ECO beach inspection monitoring conducted during the reporting period (see below).

Opportunistic visual inspections were conducted by the previously appointed ECO from a vessel en-route to Big Bay during the October and November 2024 site visits. Formal beach inspections were carried out in May 2025 and November 2025.

Table 12. Members of Aquaculture Industry committed to beach monitoring and clean-up as required by EMPr conditions 1 and 2 of Table 7-1.

Responsible Party	Group/Affiliation	Precinct	Beach	Frequency
Wayne Maree	AquaFoods SA	Big Bay	Spreeuwalle – Paradise Beach	Twice a month
Mauritz Viljoen	Ocean Grown Aquaculture	Big Bay	Spreeuwalle – Paradise Beach	Bi-weekly
		Outer Bay North	West and Eastern Beach	Monthly
Vos Pienaar	Imbaza Mussels	Small Bay	Small Bay Northern beaches (Hoedjies Bay to Moss gas)	Weekly
SJ Poggenpoel	Blue Ocean Mussels (BOM)	Small Bay	Marcus Island – Small Bay side	Monthly

The ECO received beach clean-up data for November 2025 for clean ups from the following operators:

- Ocean Grown Aquaculture - Big Bay (Spreeuwalle) and Inner Bay (Yacht port, Transnet and Blue Bay Lodge)
- Imbaza Mussels - Small Bay

The following was noted:

- 79 aquaculture floats were found on beaches located adjacent to Big Bay.
- 14 aquaculture floats were found on beaches adjacent to Small Bay/Inner Bay.

- 26 bags of waste was collected on Northern Beach (Small Bay). The majority waste type collected on Northern Beach (Small Bay) was noted to be general litter with ~5% attributed to the aquaculture industry.

Please refer to **Figure 15** to **Figure 23** for photographic evidence.

The ECO noted that no beach monitoring of Outer Bay North occurred during the November 2025 period. It is understood this is due to all lease areas within the area being decommissioned and no farming activity occurring. Additionally, records for Small Bay lacked information pertaining to location, photographic evidence and date of beach inspections. Additionally, the ECO advises that “before” and “after” images should always be taken to ensure proper documentation of the site conditions prior to cleanup activities. It is noted that no beach cleanup information has been received for Marcus Island or the TNPA port breakwater area.

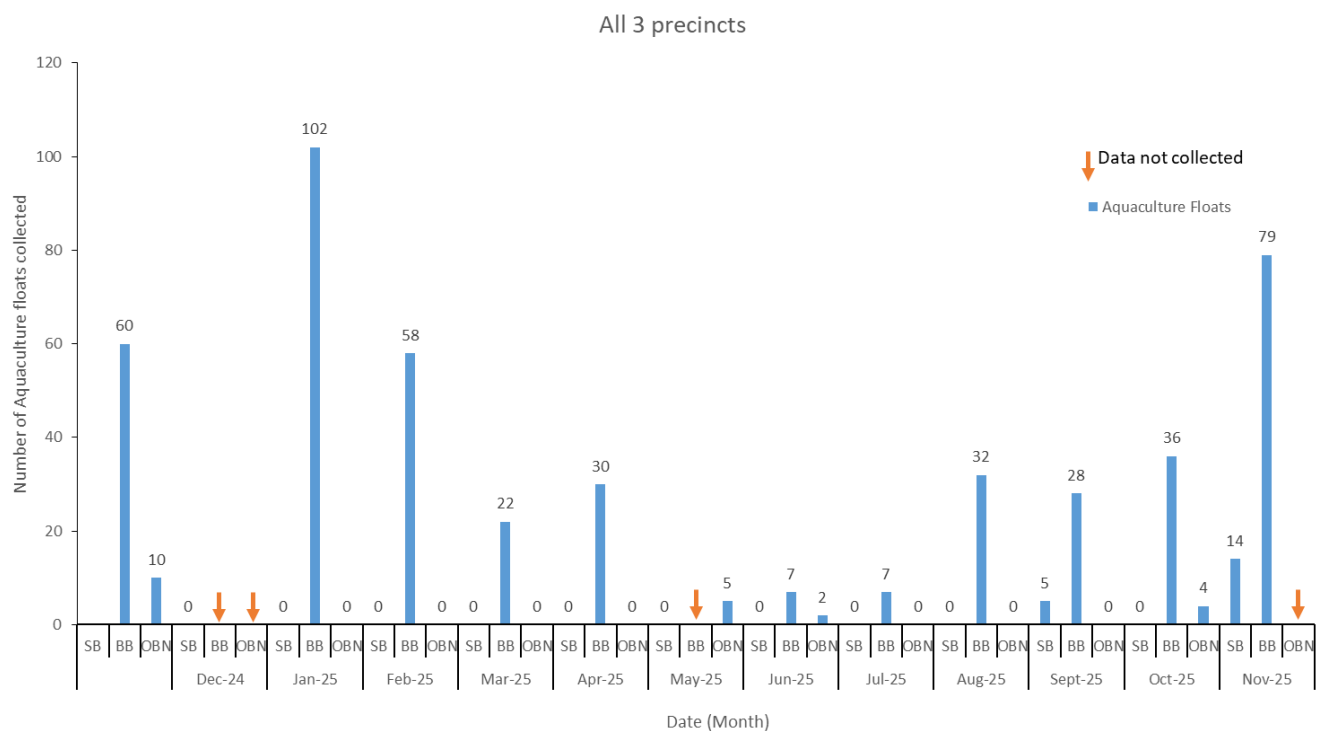


Figure 2. Floats collected from beaches in various precincts. Orange arrows indicate absence of reporting.

5.2 Beach Monitoring by the ECO

The ECO conducted spot beach inspection at Spreeuwalle beach, adjacent to Big Bay, on the 18th of December 2025. The following observations were made during the inspections:

- 10 aquaculture floats were observed along the beachfront, wedged between or beneath large rocks and boulders. With the exception of one float labelled as SBOC, the floats did not display unique identifying markers.

- Various rope offcuts were observed within the rocks/shoreline of the beachfront. These included both small and longer rope offcuts.

Please refer to **Figure 24** to **Figure 36** for photographic evidence.



Figures 3. Beach inspection conducted by ECO during December 2025 noted in red. (created via Strava and Google Earth Pro, 2025)

6 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register. An environmental incident register is in place.

During the reporting period the following is noted:

- No incidents were reported during the December 2025 reporting period.
- On the 10th of September 2025, the 14B south mooring at AquaFoods SA Farm was reported to come loose from a shackle at the block while harvesting of the line was being undertaken. No environmental damage was observed. The operator initially tied the affected mooring to the adjacent 13b mooring. The ECO has followed up with the relevant operator to confirm if the mooring shackle has been repaired. Feedback is still awaited from the operator.

- On the 17th of October 2025, the ECO was made aware of an oyster line on Lagoon Aqua Farm being observed out of place and bundled up due to the north riser line breaking off. The ECO communicated this with the relevant operator and was advised on the 23rd of October 2025 and the 17th of November 2025 that the Operator is attending to the broken line with a two-week remediation timeframe required to remove the stock and fix the line. The ECO is currently awaiting feedback on the remediation.

No NEMA section 30 environmental incident/s were reported during this audit period.

7 DECOMMISSIONING PLANS

Southern Atlantic Sea Farms and Southern Cross Sea Farms has completed all decommissioning activities within the Outer Bay North precinct. Confirmation of removal of all infrastructure has been received by Ocean Grown Aquaculture on the 03rd of November 2025.

The following farms are currently in various stages of decommissioning (as per communications received on the 03rd of November 2025):

- Southern Atlantic Sea Farms (Big Bay): **Eleven (11)** lines remain in the water and are yet to be removed. Additionally, twenty-two (22) of the 3.2 tons blocks and twenty-two (22) of the 1.2 ton sleeper packs are still required for removal.
- K2019005713 (Big Bay): The submitted Farm Monitoring Report indicates that **six (6)** dormant lines remain in the water. Additionally, fourteen (14) of the 3.2 tons blocks and fourteen (14) of the 1.2 ton sleeper packs are still required for removal.
- K2019005725 (Big Bay): The submitted Farm Monitoring Report indicates that **seven (7)** dormant lines remain in the water. Additionally, fourteen (14) of the 3.2 tons blocks and fourteen (14) of the 1.2 ton sleeper packs are still required for removal.

The ECO has further been advised that the relevant farm operator is currently busy focusing decommissioning and relocation of infrastructure to the following lease areas:

- Saldanha Bay Ocean Company (SBOC) in Big Bay,
- Ocean Grown Aquaculture (previously West Coast Oyster Growers) in Big Bay, and
- West Coast Aquaculture in Small Bay.

All the recovered 3.2T blocks have been used for current line installations. For all future line installations operators will be casting new mooring blocks (6 Tons).

No further updates on the decommissioning activities were received in December 2025.

7.1 Update on Section 28(3)(c) processes

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 submitted adequate representation demonstrating why their Right should not be cancelled or revoked.

Table 13 below provides an update on the Section 28(3)(c) processes for the Saldanha Bay ADZ.

Table 13. Status of Section 28(3)(c) processes for the Saldanha Bay ADZ

Right Holder	Validity Period	Right Reference	Status
Chapmans Aquaculture Company (Pty) Ltd (Chapmans)	14 September 2016 - 15 September 2031	MAQUA1034	Right cancelled
Requa Enterprises (Pty) Ltd (Requa)	18 October 2016 - 17 October 2031	MAQUA1035	Right cancelled
MMM Agriconsult (Pty) Ltd (MMM)	21 February 2020 - 20 February 2035	MAQUA1045	Right cancelled
Pluto Mussels and Trading (Pty) Ltd (Pluto)	21 February 2020 - 20 February 2035	MAQUA1051	Right Not cancelled
Xesibe Aquaculture Projects (Pty) Ltd (Xesibe)	21 February 2020 - 20 February 2035	MAQUA1046	Right cancelled
Madima General Agricultural Trading (Pty) Ltd (Madima)	21 February 2020 - 20 February 2035	MAQUA1048	Right cancelled
Ulwazi Kukutya (Pty) Ltd (Ulwazi)	21 February 2020 - 20 February 2035	MAQUA1050	Right cancelled
Blue Lagoon Products (Pty) Ltd (BLP)	21 February 2020 - 20 February 2035	MAQUA1057	Right cancelled
Simunye Mussels (Pty) Ltd (Simunye)	21 February 2020 - 20 February 2035	MAQUA1047	Right cancelled
K2019005725 (Pty) Ltd (K25),	25 March 2020 – 24 March 2035	MAQUA1052	Right cancelled

K2019005713 (Pty) Ltd (K13),	25 March 2020 – 24 March 2035	MAQUA1053	Right cancelled
CEX Enterprises (Pty) Ltd (CEX)	25 March 2020 – 24 March 2035	MAQUA1056	Right cancelled
Wada Projects (Pty) Ltd (Wada)	25 March 2020 – 24 March 2035	MAQUA1055	Right cancelled
Well Done Works (Pty) Ltd (Well Done)	25 March 2020 – 24 March 2035	MAQUA1054	Right cancelled

8 FARM MONITORING REPORTS

All aquaculture operators are required to complete and submit Farm Monitoring Reports (“**FMRs**”) by the 15th of each month for the preceding reporting period. Each submission must be accompanied by supporting verification documentation (such as invoices or other records) to confirm production figures.

A separate FMR is required for each farmed product and for every precinct in which an operator is active. Accordingly, the feedback presented below reflects the total number of FMRs submitted across the various precincts and product types.

As of the 14th of January 2026, a total of sixteen Farm Monitoring Reports were received on time and four were late. Four lease areas reported no sales and 17 lease areas had no activity due to either being decommissioned (or in the process thereof) or never commencing with activities.

Note: In respect of Table 13 below, lease areas where marine rights have been revoked or denied, or where no infrastructure is present in the water, have been removed from the table.

Table 14. FMR submission status, supporting production - verification documents and visual inspection logs. Late submissions, lack of supporting documents and not providing visual logs are highlighted in red.

Farm Name	Location	Species	Date	Supporting Documentation	Visual Inspection Log	Notes
African Olive Trading	Small Bay	Mussels	12/12/2025	No	Yes	Last harvesting day was on 27 October 2025
AquaFoods SA	Small Bay	Mussels Oysters	23/12/2025	Yes	Yes	-
Aquafoods SA	Big Bay	Mussels	No farming activity. Farm has been decommissioned.			

Blue Ocean Mussels	Small Bay	Mussels	08/01/2026	Yes	Yes	-
Blue Sapphire Pearls	Small Bay	Mussels Oysters	15/12/2025	Yes	Yes	-
Blue Sapphire Pearls	Big Bay	Mussels Oysters	15/12/2025	No farm sales	Farm observations vested in Ocean Grown Aquaculture group.	
Imbaza Mussels	Small Bay	Mussels	17/12/2025	No farm sales	Yes	-
K2019005713	Big Bay	Mussels	Decommissioning in progress. However, FMR has been received on 11/12/2025.			
K2019005725	Big Bay	Mussels	Decommissioning in progress. However, FMR has been received on 11/12/2025.			
Lagoon Aqua Farm	Big Bay	Oysters	15/12/2025	No farm sales	No	Farm is closed.
Mika Growers	Big Bay	Mussels	11/12/2025	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Molapong	Big Bay	Salmon	No farming activity. Farm has been decommissioned.			
Pluto Mussels and Trading	Big Bay	Mussels	17/12/2025	No	No	-
Saldanha Bay Oyster Company	Small Bay	Oysters	11/12/2025	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Saldanha Bay Oyster Company	Big Bay	Mussels	11/12/2025	Yes		
Salmar Trading	Small Bay	Oysters	15/12/2025	Yes	Yes	-
Southern Atlantic Sea Farms 2	Big Bay	Mussels	No farming activity. Farm has been decommissioned. However, FMR has been received on 11/12/2025.			
West Coast Aquaculture	Small Bay	Mussels Oysters	11/12/2025	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Ocean Grown Aquaculture	Big Bay	Mussels Oysters	11/12/2025	Yes		
Ocean Grown Aquaculture	Small Bay	Mussels Oysters	11/12/2025	Yes		

9 OPERATOR COMPLIANCE WITH THE EA AND EMPR

As noted above, the ECO audited three aquaculture farms within the Small Bay ADZ Precinct in the December 2025 audit period. The information summarises the inspection observations and interview responses noted.

African Olive Trading

- Approved for 23 mussel rafts and 1 seaweed longline.
- 22 mussel rafts observed.
- 1 seaweed longline observed.
- All rafts were observed well situated with good spacing noted between.
- Lines on the raft were observed straight, taut and properly aligned.
- No excess or loose infrastructure observed.
- No bright colours observed on the rafts.
- All rafts have been labelled with the lease name and raft number (i.e. AOT1, AOT2 etc.)
- No litter observed on top of rafts or in the water.
- No diesel/oil spills were noted within the lease area boundaries.

Note: The ECO was advised that no harvesting has taken place since October 2025. The farm continues to undertake maintenance inspections.

Please refer to **Figure 5** to **Figure 7** for photographic evidence.

Imbaza Mussels

- Approved for 26 mussel rafts.
- 26 mussel rafts observed.
- All rafts were observed well situated with good spacing noted between.
- Lines on the raft were observed straight, taut and properly aligned.
- No excess or loose infrastructure observed.
- No bright colours observed on the rafts.
- All rafts have been labelled with the lease name and raft number (i.e. IM1, IM2 etc.)
- No litter observed on top of rafts or in the water.
- No diesel/oil spills were noted within the lease area boundaries.

Note: The ECO was advised that no harvesting has taken place since October 2025. The farm continues to undertake maintenance inspections.

Please refer to **Figure 8** to **Figure 10** for photographic evidence.

Blue Ocean Mussels

- Approved for 45 mussel rafts, 3 mussel longlines and 2 seaweed longlines.
- 44 mussel rafts observed. 2 mussel longlines and 2 seaweed longlines observed.
- All rafts were observed well situated with good spacing noted between.
- Lines on the raft were observed straight, taut and properly aligned.
- No excess or loose infrastructure observed.
- No bright colours observed on the rafts.
- All rafts have been labelled with the lease name and raft number (i.e. BOM1, BOM2 etc.)
- Unique identifying markers could not be seen on the mussel longlines.
- No litter observed on top of rafts or in the water.
- No diesel/oil spills were noted within the lease area boundaries.

Please refer to **Figure 11** to **Figure 14** for photographic evidence.

9.1 Waste Management

Waste continues to be appropriately managed across the ADZ. General waste is collected and stored in municipal black bins with lids and removed on a weekly basis by the local municipality. In some cases, solid waste is transported directly to the Saldanha Bay Landfill Facility for proper disposal. No solid waste or litter was observed on the Pepper Bay Jetty.

In addition, operators have explored opportunities for the beneficial reuse of biological waste in alternative markets. These initiatives include the potential use of bio-waste materials in road construction and as filtration media in aquaculture and fish-keeping systems.

Records of waste generation and disposal are noted within the monthly FMRs submitted by the aquaculture operators in the ADZ to the ECO.

9.2 Audit compliance and Findings

In terms of the findings and results of the **December 2025** ECO audit, the project achieved an overall **99.07%** compliance rating with the conditions of the EAs and EMPrs.

Table 15: December 2025 Audit Compliance

SUMMARY OF RESULTS										
No.	COMPLIANCE WITH:	Compliant	Partially Compliant	Non-Compliant	Not Applicable / Not Audited	Work in Progress	Informative	Number of Conditions	Audit Score	Audit Compliance %
	Score	2	1	0	NA	WiP	INFO			
1	Environmental Authorisation: Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	63	1	1	34	0	12	111	127	98%
2	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Operational Phase	70	0	1	74	2	3	150	140	99%
3	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Decommissioning Phase	11	0	0	0	1	0	12	22	100.0%
4	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Environmental Monitoring and Corrective Action	16	0	0	8	0	0	24	32	100.0%
TOTAL		160	1	2	116	3	15	297	321	99.07%
Total Score		320	1	0	NA	NA	NA			

9.2.1 Minor improvements required

- All ADZ aquaculture infrastructure is to be removed from the Spreeuwalle beachfront.
- More accurate beach clean-up data is to be collected with accompanying location and photographs captured. This is noted as a repeated recommendation.
- All farm incidents are to be documented and closed out as soon as possible with evidence provided to the ECO. This is noted as a repeated recommendation.
- Unique identifying markers are to be placed on all aquaculture infrastructure in line with the EMP requirements.

9.2.2 Major improvements required.

- The EA Holder should continue engagements with Transnet National Ports Authority (“**TNPA**”) to ensure 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.
- The ECO is to be informed of all infrastructure modifications, additions and/or removals by the relevant aquaculture Operator in the ADZ at least two weeks prior to implementation.

9.2.3 Summary of Compliance with the EA and EMPr

This section provides an overview of the ECO’s assessment of compliance with the conditions of the EA and the approved EMPr over the preceding audit periods. Compliance scores and percentages from previous ECO audits are summarised to illustrate trends in environmental performance, highlight areas of consistent adherence, and note intervals requiring improvement.

For context, the conditions assessed by the previous ECO and the current NCC ECO are not directly comparable, as NCC identified a substantially larger set of 297 auditable conditions, whereas the previous ECO assessed only 27; therefore, the figures presented reflect different audit scopes rather than a change in compliance performance.

Table 16. Historic compliance with the EA and EMPr

Audit Date	Total Applicable Conditions	Compliance Percentage (%)	Compliant	Partially Compliant	Non-Compliant	Not Applicable / Not Audited	Work in Progress	Informative
21/01/2025	24	83	20	4	0	3	N/A	N/A
11/02/2025	24	92	22	2	0	3	N/A	N/A
25/03/2025	24	92	22	2	0	3	N/A	N/A
29/04/2025	24	92	22	2	0	3	N/A	N/A
21/05/2025	24	92	22	2	0	3	N/A	N/A
No ECO audits were conducted between June 2025 and September 2025								

14/10/2025	164	95.98%	157	3	3	118	1	15
18/12/2025	163	99.07%	160	1	2	116	3	15

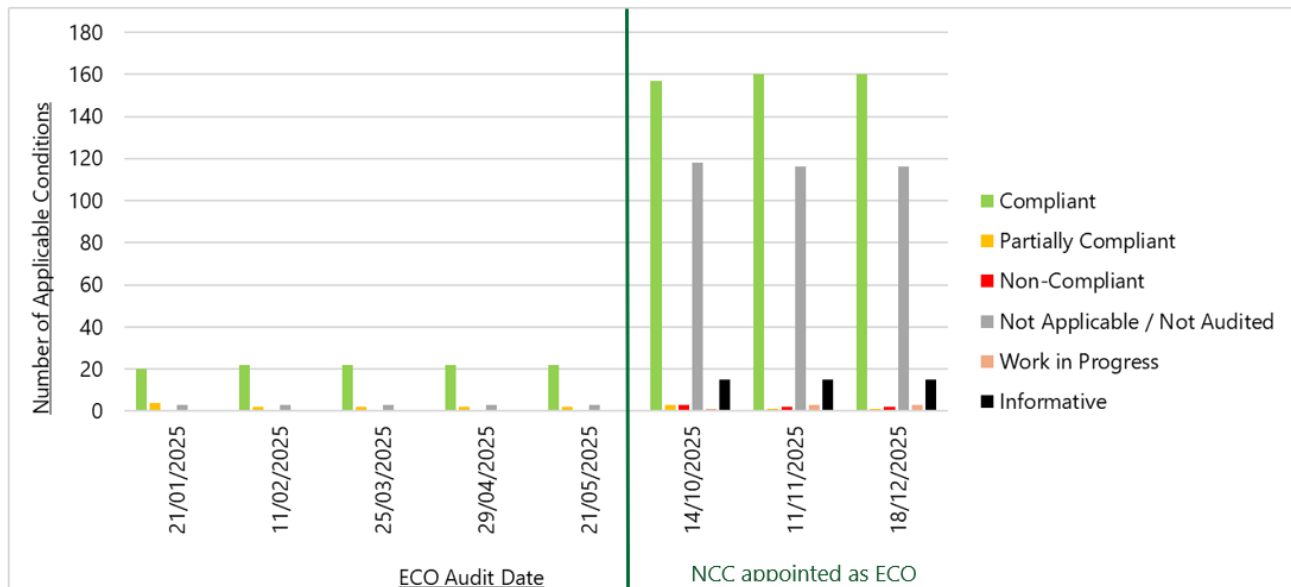


Figure 4. Historic compliance upheld by the Saldanha ADZ

For context, the conditions assessed by the previous ECO and the current NCC ECO are not directly comparable, as NCC identified a substantially larger set of 297 auditable conditions, whereas the previous ECO assessed only 27; therefore, the figures presented reflect different audit scopes rather than a change in compliance performance.

10 RECOMMENDATIONS AND CONCLUSION

10.1 Recommendations

The following recommendations are made by the ECO for the consideration of the DFFE: Fisheries Management

- The EA Holder should continue engagements with Transnet National Prots Authority ("TNPA") to ensure 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.
- The ECO is to be informed of all infrastructure modifications, additions and/or removals by the relevant aquaculture Operator in the ADZ at least two weeks prior to implementation.
- Visual inspection logs are to be to be supplied to the ECO by all aquaculture operators in the ADZ.
- Supporting documentation for farm sales are to be provided to the ECO by all aquaculture operators in the ADZ.
- All ADZ aquaculture infrastructure is to be removed from the Spreeuwalbe beachfront.
- More accurate beach clean-up data is to be collected with accompanying location and photographs captured. This is noted as a repeated recommendation.

- All farm incidents are to be documented and closed out as soon as possible with evidence provided to the ECO. This is noted as a repeated recommendation.
- Unique identifying markers are to be placed on all aquaculture infrastructure in line with the EMP requirements.

10.2 Conclusion

NCC Environmental Services (Pty) Ltd was appointed as the Environmental Control Officer for the Saldanha Bay Aquaculture Development Zone for the period 07 October 2025 to 06 February 2026. On the 18th of December 2025, the ECO conducted on-water inspections of three lease areas in Small Bay. No litter or oil spills were observed during the audit, and all rafts were found to be well anchored, with lines being straight and taut. All rafts were clearly marked in according to lease area name and farm sequence.

No incidents were reported during the December 2025 reporting period. However, the ECO requires feedback and status updates on two incidents reported during the October 2025 audit period.

Beach clean-up data for November 2025 was received from Ocean Grown Aquaculture and Imbaza Mussels. A total of 79 aquaculture floats were recorded on beaches adjacent to Big Bay, while 14 floats were identified along beaches in the Small Bay/Inner Bay area. In addition, 26 bags of waste were collected from Northern Beach (Small Bay), with the majority consisting of general litter and approximately 5% attributed to aquaculture-related debris.

The ECO noted that in some beach clean-ups photographs were not captured by operator representatives and recommends that these be consistently taken to document site conditions prior to clean-up activities. Additionally, some submissions lacked details regarding location, photographic evidence, and inspection dates, which should be improved in future reporting.

The ECO conducted a spot beach inspection at Spreeuwalle Beach, adjacent to Big Bay, on the 18th of December 2025. During the inspection, 10 aquaculture floats were observed along the beachfront, wedged between or beneath large rocks and boulders. With the exception of one float labelled as SBOC, the floats did not display unique identifying markers. In addition, various rope offcuts of differing lengths were noted within the rocks and along the shoreline.

As of the 14th of January 2026, a total of sixteen Farm Monitoring Reports were received on time and four were late. Four lease areas reported no sales, and 17 lease areas had no activity due to either being decommissioned (or in the process thereof) or never commencing with activities.

Overall, environmental compliance within the Saldanha Bay ADZ remains high, with operators demonstrating continued commitment to environmental management and reporting. Minor administrative improvements in record-keeping, photographic documentation, and timely submission of FMRs are recommended to further strengthen compliance consistency and environmental performance.

10.3 Evaluation of EMPr

In the opinion of the ECO, no amendments to the EMPr are required at this stage, as the current measures remain adequate to ensure the continued avoidance, management, and mitigation of environmental impacts. Furthermore, the ECO does not recommend any changes to the EMPr to maintain compliance with the conditions of the EA.

PREPARED BY:

A handwritten signature in black ink, appearing to read 'Michelle Lee', is positioned above the printed name.

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Environmental Control Officer

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NCC Environmental Services (Pty) Ltd

ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	Proposed Corrective Action	Status	Closure status
001	November 2025	The ECO is awaiting feedback on the status of remediation for the incident reported on the 10/09/2025.	Immediately	Advise ECO on status of remediation	Open	TBC

Closed Concerns

No	Observation date	Concern/Complaint	Due Date suggested by ECO	Corrective Action Taken	Outcome	Closure status

ANNEXURE B – PHOTOGRAPHS

African Olive Traders



Figure 5. Seaweed longline with all buoys marked according to lease name. Buoys black in colour to limit visual impact.



Figure 6. Rafts placed in arrangement of 3 or 4 per line. All droppers noted to be straight and well attached to raft. Raft labelled according to lease name and sequence number.



Figure 7. Service barge noted to be free of equipment and waste. No loose infrastructure observed.

Imbaza Mussels



Figure 8. Rafts well-spaced from one another. All droppers observed in straight alignment. No bright colours observed.

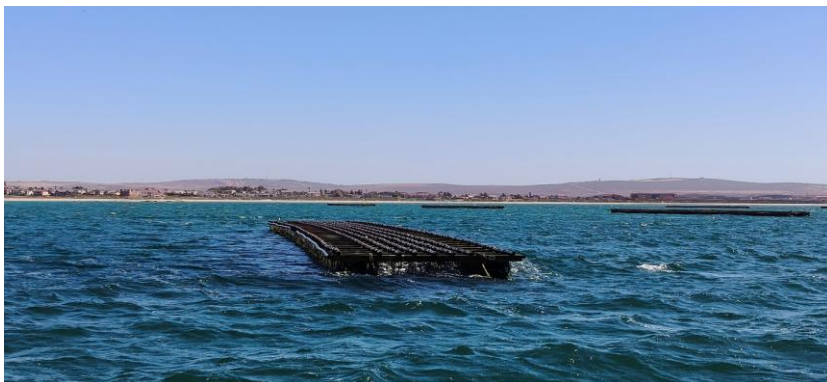


Figure 9. No loose infrastructure observed. No equipment noted on rafts.



Figure 10. Rafts labelled according to lease area (IM)

Blue Ocean Mussels



Figure 11. Rafts placed in arrangement of 3 or 4 per line. All droppers noted to be straight and well attached to raft. Raft labelled according to lease name and sequence number.



Figure 12. Droppers noted to be straight and well attached to rafts.



Figure 13. Longline floats noted to be painted with lease name. Paint noted to have washed away on several floats.



Figure 14. Seeding of mussel raft observed.

Beach cleanup activities undertaken by aquaculture operators in the ADZ



Figure 15. Captured 06/11/2025 - Before



Figure 16. Captured 06/11/2025 - After



Figure 17. Captured 14/11/2025 - Before



Figure 18. Captured 14/11/2025 - After



Figure 19. Captured 19/11/2025 - After



Figure 20. Captured 27/11/2025 - Before



Figure 21. Captured 28/11/2025 - Before



Figure 22. Captured 28/11/2025 - After



Figure 23. Captured 28/11/2025 - After

Beach Inspection undertaken by the ECO



Figure 24. Rope found within rocks on beachfront.



Figure 25. Rope offcut found along beachfront

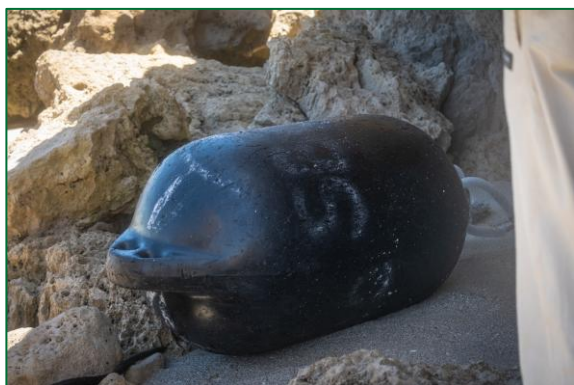


Figure 26 SBOC buoy observed between rocks.

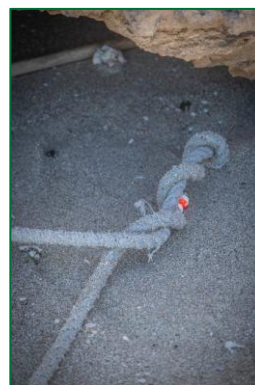


Figure 27. Rope offcut observed between rocks.



Figure 28. Unmarked black buoy wedged in rocks.

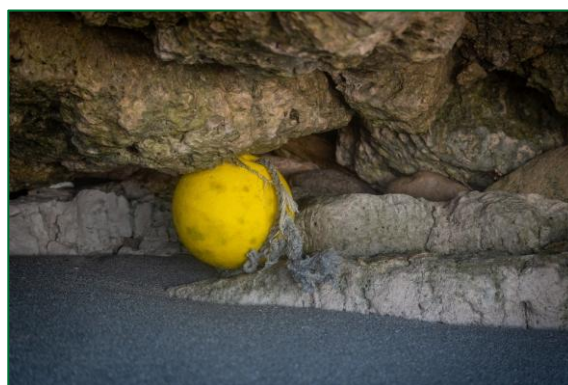


Figure 29. Yellow buoy observed under rockface.



Figure 30. Unmarked black buoy wedged in rocks

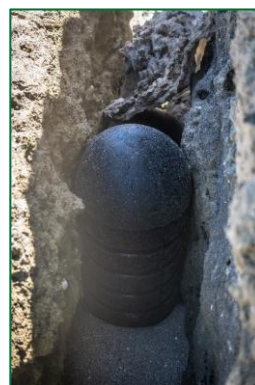


Figure 31. Unmarked black buoy wedged in rocks



Figure 32. Unmarked black buoy wedged in rocks



Figure 33. Unmarked black buoy wedged in rocks



Figure 34. Rope offcut observed on beachfront.



Figure 35. Rope offcut observed on beachfront.

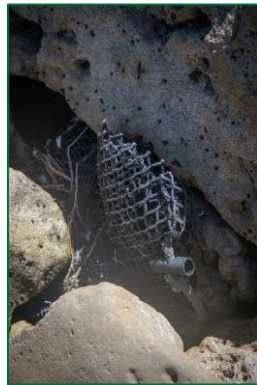


Figure 36. Plastic netting wedged in between rocks.

SALDANHA BAY AQUACULTURE DEVELOPMENT ZONE

Environmental Control Officer Site Inspection and Farm Monitoring Verification Report

PREPARED FOR:

The Department of Forestry,
Fisheries and the Environment
Branch: Fisheries Management

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**forestry, fisheries
& the environment**

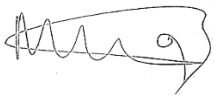
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

DECLARATION OF INDEPENDENCE

Environmental Control Officer

I, Michelle Lee, as duly authorised representative of NCC Environmental Services (Pty) Ltd ("**NCC**"), hereby confirm my independence (as well as that of NCC) as an auditor and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which the Department of Forestry, Fisheries and the Environment ("**DFFE**") has appointed NCC as Environmental Control Officer ("**ECO**"), other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Michelle Lee', enclosed within a rectangular box.

Michelle Lee

27 January 2026

Environmental Control Officer

NCC Environmental Services (Pty) Ltd

Audit Reviewer

I, Nick Gates, as duly authorised representative of NCC Environmental Services (Pty) Ltd, hereby confirm my independence (as well as that of NCC) as an audit reviewer and declare that neither I nor NCC have any interest, be it business, financial, personal or other, in any proposed activity, application or appeal in respect of which the Department of Forestry, Fisheries and the Environment has appointed NCC as Environmental Control Officer, other than fair remuneration for worked performed, specifically in connection with the Environmental Authorisations and Environmental Management Programmes. I further declare that I am confident in the results of the audit undertaken and the findings as a result of it – as are described in this report.

Signed:

A handwritten signature in black ink, appearing to read 'Nick Gates', enclosed within a rectangular box.

Nick Gates

27 January 2026

ECO Line Manager

NCC Environmental Services (Pty) Ltd

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DOCUMENT CONTROL

REPORT TITLE	Environmental Control Officer Site Inspection and Farm Monitoring Verification Report - #42
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ECO	NCC Environmental Services (Pty) Ltd
AUDIT MONTH	January 2026
REVISION	00
DATE	27 January 2026

Revision	Date	Description
Rev 00	27/01/2026	First Draft - Internal
Rev 01	09/02/2026	Final - Authority submission

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Saldanha Bay ADZ Management Committee		09/02/2026	Electronic
Director of Compliance	DFFE	09/02/2026	Electronic

TABLE OF CONTENTS

ABBREVIATIONS	8
1 INTRODUCTION	9
1.1 AUDIT SCOPE AND PURPOSE.....	10
1.2 ASSUMPTIONS AND LIMITATIONS.....	11
1.3 COMPLIANCE WITH REGULATION 34 OF THE EIA REGULATIONS, 2014 (AS AMENDED).....	11
1.4 MONITORING FREQUENCY AND REPORTING.....	13
2 PROJECT TEAM.....	14
3 AUDIT APPROACH	16
3.1 GENERAL APPROACH.....	16
3.2 AUDIT TABLES AND COMPLIANCE RATINGS	16
3.3 SITE INSPECTIONS	17
3.4 CONSULTATIONS AND COMMUNICATIONS	19
3.4.1 Consultations.....	19
3.4.2 Communications.....	20
4 GENERAL (NOTABLE EVENTS).....	21
4.1 GENERAL OUTSTANDING MATTERS.....	21
4.2 CHANGE IN INFRASTRUCTURE	21
4.2.1 Saldanha Bay Oyster Company (Big Bay) – Movement of Lines	21
4.3 FARM MAINTENANCE PLAN FEEDBACK.....	21
4.4 CONSERVATION OF FAUNA	21
5 BEACH INSPECTIONS.....	23
5.1 BEACH MONITORING BY OPERATORS	23
5.2 BEACH MONITORING BY THE ECO	25
6 INCIDENTS AND ACCIDENTS	26
7 DECOMMISSIONING PLANS	27
7.1 LAGOON AQUA NON-COMPLIANCE	28
8 FARM MONITORING REPORTS	28
9 OPERATOR COMPLIANCE WITH THE EA AND EMPr.....	30
9.1 WASTE MANAGEMENT.....	32
9.2 AUDIT COMPLIANCE AND FINDINGS.....	32
9.2.1 Minor improvements required.....	33
9.2.2 Major improvements required.....	33
9.2.3 Summary of Compliance with the EA and EMPr	33
10 RECOMMENDATIONS AND CONCLUSION	35
10.1 RECOMMENDATIONS.....	35
10.2 CONCLUSION.....	36
10.3 EVALUATION OF EMPr.....	37
ANNEXURE A – CONCERNS/COMPLAINTS REGISTER	38
ANNEXURE B – PHOTOGRAPHS	39

LIST OF FIGURES

Figure 1. Locality map of ECO on-water inspection route with farms audited noted (created via Google Earth Pro, 2026).....	18
Figure 2. Floats collected from beaches in various precincts. Orange arrows indicate absence of reporting.	25
Figures 3. Beach inspection route conducted by ECO during January 2026 noted in red with lookout points noted in green (created via Strava and Google Earth Pro, 2026)	26
Figure 4. Historic compliance upheld by the Saldanha ADZ. Green line denotes when NCC was appointed as ECO.....	35
Figure 5. Mussel longline with floats marked with a letter "P". Floats black in colour to limit visual disturbance.	40
Figure 6. Two mussel longlines observed with floats marked with a letter "P". Floats black in colour to limit visual disturbance.....	40
Figure 7. Mussel longlines observed to be curved in the water.	40
Figure 8. No on-water infrastructure observed within lease area.	42
Figure 9. No on-water infrastructure observed within lease area.	42
Figure 10. No on-water infrastructure observed within lease area.	42
Figure 11. Lines observed to be straight with end buoys well floated.....	43
Figure 12. End floats labelled with farm name and float sequence number ("33 SBOC")	43
Figure 13. White cable ties observed on floats as unique identifying marker.	43
Figure 14. Lines observed to be straight with buoys well floated.....	44
Figure 15. Line with broken shackle tied to adjacent mooring and awaiting repair.....	44
Figure 16. End floats labelled with farm name ("AF")	44
Figure 17. Captured 12/12/2025 - Before	45
Figure 18. Captured 12/12/2025 - After	45
Figure 19. Captured 15/12/2025	45
Figure 20. Captured 17/12/2025	46
Figure 21. Tyre found along Saldanha Bay Beach.....	47
Figure 22. Rope offcut found along Northern Bay beachfront	47
Figure 23. Unmarked buoy observed in front of Blue Bay Lodge.....	47
Figure 24. Rope offcut found along Northern Bay beachfront	47
Figure 25. Rope offcut found along Northern Bay beachfront	47
Figure 26. Rope offcut found along Northern Bay beachfront	47

LIST OF TABLES

Table 1: Summary of environmental requirements / criteria relating to the overall project.....	10
Table 2. Legal requirements for Audit Reports as per Appendix 7 of the EIA Regulations, 2014 (as amended). 12	
Table 3. Line Manager Details.....	14
Table 4. Lead ECO Details.....	14
Table 5. Secretariat and support details	15
Table 6: Compliance rating and scoring.....	17
Table 7. Saldanha Bay ADZ Farm Inspection Schedule. Grey blocks indicate farms that have had no farming activity or infrastructure in the water.....	18
Table 8. Communications received by the ECO during the audit period	20
Table 9. Precinct observations verified for December 2025.	22
Table 10. Faunal Observations made within the Saldanha Bay ADZ by Ocean Grown Aquaculture from 01/12/2025 to 19/12/2025.....	23
Table 11. Faunal Observations made within the Saldanha Bay ADZ by Imbaza Mussels from the 01/12/2026 to the 24/12/2025	23

Table 12. Members of Aquaculture Industry committed to beach monitoring and clean-up as required by EMPr conditions 1 and 2 of Table 7-1.....	24
Table 14. FMR submission status, supporting production - verification documents and visual inspection logs. Late submissions, lack of supporting documents and not providing visual logs are highlighted in red.	29
Table 15: January 2026 Audit Compliance.....	32
Table 16. Historic compliance with the EA and EMPr	34

ABBREVIATIONS

ADZ	Aquaculture Development Zone
AMC	ADZ Management Committee
BAR	Basic Assessment Report
BSASA	Bivalve Shellfish Association of South Africa
CA	Competent Authority
DEA	Department of Environmental Affairs (now DFFE)
DFFE	Department of Forestry, Fisheries, and the Environment
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ER	Employer's Representative
ETP	Endangered, threatened and protected
FMR	Farm Monitoring Reports
I&APs	Interested and Affected Parties
IAIASA	International Association for Impact Assessment South Africa
MLRA	Marine Living Resources Act, 1998 (Act No. 18 of 1998)
MLRF	Marine Living Resources Fund
NCC	NCC Environmental Services (Pty) Ltd
NCR	Non-Compliance Report
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
SAMSA	South African Marine Safety Authority
SDC	Safe Disposal Certificate
SHE	Safety, Health, and Environment
SHERQ	Safety Health Environment Risk & Quality.
TBC	To Be Confirmed
TNPA	Transnet National Ports Authority

1 INTRODUCTION

The Department of Forestry, Fisheries and the Environment (“**DFFE**”), through the Marine Living Resources Fund (“**MLRF**”), has established a sea-based Aquaculture Development Zone (“**ADZ**”) within Saldanha Bay, Western Cape, to promote sustainable marine aquaculture and support economic development in the coastal region. In accordance with the Environmental Authorisation (“**EA**”) and the Environmental Management Programme (“**EMPr**”) issued for the ADZ, the appointment of an independent Environmental Control Officer (“**ECO**”) is a regulatory requirement to ensure environmental compliance and the responsible execution of aquaculture operations.

NCC Environmental Services (Pty) Ltd (“**NCC**”) has been appointed by the DFFE to provide suitably experienced independent ECO services for the Saldanha Bay sea-based ADZ in compliance with the conditions stipulated in the EA and EMPr for a contract period of four (**4**) months from 07 October 2025 to 06 February 2026.

The Saldanha Bay ADZ commenced with operations in **February 2019**.

Ongoing complaints have been received from members of the public regarding debris originating from aquaculture operations washing ashore along public beaches. Reported debris typically includes crates, ropes, baskets, and floats, which are often biofouled and decomposing, resulting in unpleasant odours and attracting flies. Such occurrences are contrary to the requirements outlined in the ADZ EMPr and the individual farm EMPrs.

In response, minimum infrastructure requirements have been established, in consultation with the industry, to strengthen waste management practices and reduce debris generation. These guidelines also serve to align farm operations with the production limits prescribed in the EMPr and EA. While it is recognised that complete prevention of infrastructure loss is impractical, aquaculture operators and the Bivalve Shellfish Association of South Africa (“**BSASA**”) conduct regular beach inspections and clean-ups, often addressing debris unrelated to aquaculture activities.

Although these clean-up efforts have proven largely effective, the ADZ continues to prioritise the reduction of debris generation and the identification of operators who fail to adequately maintain farm infrastructure. Poor maintenance not only increases debris accumulation but also negatively impacts the reputation of the entire ADZ. Accordingly, operators are required to mark their infrastructure with unique identifiers and to ensure ongoing maintenance to minimise the risk of breakage and loss, as stipulated in the EMPr.

Currently, **two** (2) aquaculture operators have committed to monitoring and cleaning the primary receiving beaches for aquaculture-related debris. Evidence of these activities, including photographic records and waste data, is submitted to the ECO monthly. Furthermore, recognising the importance of accurate production data for assessing potential environmental impacts within the Saldanha Bay system, the ADZ Management

Committee (“**AMC**”) has directed that monthly ECO audits include verification of production figures. To this end, operators submit monthly Farm Monitoring Reports (“**FMRs**”) with supporting documentation to enable cross-verification of reported sales and production data.

The ECO plays a critical role in monitoring and reporting on adherence to the stipulated environmental conditions, identifying potential risks, recommending corrective actions, and maintaining transparent communication between the MLRF, aquaculture operators, and relevant stakeholders.

A summary of the various environmental requirements i.e. the audit criteria relating to the overall project is provided in **Table 1**.

Table 1: Summary of environmental requirements / criteria relating to the overall project.

Components of overall project	Environmental requirements / criteria			
	EA		EMPr	
	DFFE EA Ref No.	Issue date	Author	Date Compiled
Environmental Authorisation: Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	14/12/16/3/3/1/1728	08/01/2018	SRK	January 2018
Amendment of Environmental Authorisation issued on 08 January 2018 for the Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	14/12/16/3/3/1/1728/AM1	10/07/2019		
	14/12/16/3/3/1/1728/AM2	16/09/2020		
	14/12/16/3/3/1/1728/AM3	02/05/2024		

1.1 Audit Scope and Purpose

In accordance with Regulation 34 of the 2014 NEMA EIA Regulations (as amended) the holder of an environmental authorisation must, for the period during which the EA and EMPr, and where applicable the closure plan, remain valid —

- Ensure that the compliance with the conditions of the EA and the EMPr, and where applicable the closure plan, is audited; and

- b) Submit an environmental audit report to the relevant competent authority.

The purpose of this environmental audit is to verify compliance to the overarching environmental requirements specified as conditions of the EAs and EMPs, and report on the extent to which the objectives of the EMPs and are being achieved.

1.2 Assumptions and Limitations

The compliance audit and report are based upon the assumptions that:

- i. All information received from the DFFE, their representatives and the aquaculture operators in the ADZ on which this audit report is based, is accurate and correct.
- ii. Evidence provided through interviews was factual and true.
- iii. No public consultation was undertaken as part of this ECO audit. In the opinion of the ECO, this was not required for the purposes of conducting the monthly site inspection audit.
- iv. A change of ECO has occurred during the operational phase of the ADZ. This was noted within the previous ECO monitoring reports submitted to the DFFE as well as the internal ECO handover report.
- v. The ECO had access to all the information necessary to compile this audit report. There are no gaps in knowledge that would suggest any level of uncertainty in the findings of the auditor.
- vi. The audit is based purely on the conditions as stipulated in the ADZ EA's, EMP's.
- vii. Where visual observations of equipment or infrastructure were not possible either due to the location or complexity to access the auditor has used other means to determine compliance, either through written evidence from operators or through interviews.
- viii. Note that NCC Environmental Services (Pty) Ltd are indemnified against any claim for damages that may result from this report and its recommendations.

1.3 Compliance With Regulation 34 of the EIA Regulations, 2014 (As Amended)

The National Environmental Management Act, 1998 (Act No. 107 of 1998) ("**NEMA**") provides the overarching framework for co-operative environmental governance in South Africa. In accordance with Sections 24(5) and 44 of NEMA, the Environmental Impact Assessment ("**EIA**") Regulations, 2014 (as amended), serve as the principal regulatory mechanism for managing and mitigating potential environmental impacts arising from listed activities and new developments.

NCC conducts environmental audits in terms of Regulation 34 of the EIA Regulations (as amended). The following should be noted in this regard:

- The audit reports prepared by NCC assess both compliance with, and the adequacy of, the approved EMPr.
- NCC's role does not extend to ensuring compliance with all other provisions of Regulation 34, such as initiating amendments to the EMPr or associated licences and permits and informing Interested and Affected Parties ("I&APs"). The responsibility for ensuring full compliance with applicable environmental authorisations and legislative requirements rests with the project proponent.
- Appendix 7 of the NEMA 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.

Table 2. Legal requirements for Audit Reports as per Appendix 7 of the EIA Regulations, 2014 (as amended).

Requirement	Report Section Reference
The environmental audit report must provide for recommendations regarding the need to amend the EMPr and the closure plan in the case of a closure activity.	Section 10
2. The objective of the environmental audit report is to- (a) report on- (i) the level of compliance with the conditions of the environmental authorisation and the EMPr and the closure plan in the case of a closure activity; and (ii) the extent to which the avoidance, management and mitigation measures provided for in the EMPr and closure plan achieve the objectives and outcomes of the EMPr and closure plan;	Section 5 - Section 10
2(b) identify and assess any new impacts and risks as a result of undertaking the activity;	Section 10
2(c) evaluate the effectiveness of the EMPr, and the closure plan in the case of a closure activity;	Section 10
2(d) identify shortcomings in the EMPr, and the closure plan in the case of a closure activity; and	Section 10
(e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and the closure plan in the case of a closure activity.	Section 5 – Section 10
(1) An environmental audit report prepared in terms of these Regulations must contain-	N/A
(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.	Section 2
(b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Page 2
(c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Section 1.1
(d) A description of the methodology adopted in preparing the environmental audit report.	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	Section 5 – Section 10

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.	
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge	Section 1.2
(g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Section 3.4
(h) A summary and copies of any comments that were received during any consultation process.	Section 3.4
(i) Any other information requested by the competent authority.	N/A

1.4 Monitoring Frequency and Reporting

The monitoring and reporting frequency by the ECO are monthly. In terms of this monitoring report, site inspections were undertaken on the **16th of January 2026** after which this report was compiled which serves to document and record the audit proceedings and observations and provide recommendations and conclusions in relation to the audit.

This report details the activities and compliance demonstrated for the Saldanha Bay ADZ (EA: 14/12/16/3/3/1/1728, 14/12/16/3/3/1/1728/AM1, 14/12/16/3/3/1/1728/AM2 and 14/12/16/3/3/1/1728/AM3) only. This report covers the monthly reporting for the month of January 2026.

2 PROJECT TEAM

NCC is a multi-disciplinary environmental consulting company based in South Africa which adopts a 'values driven' approach with a common purpose to conserve and create sustainable environments that enable people, planet and business to thrive. We are a trusted partner to major engineering and construction firms, mines, parastatals, film, sports and event production companies, municipalities, provincial and national government, and conservation organisations. Drawing on our years of experience on a wide range of projects, NCC works with our clients to develop, implement, and monitor customised services that add real value.

Our project team is composed of seasoned environmental professionals with extensive experience in environmental compliance monitoring. The project will be overseen by a dedicated Line Manager who will provide strategic oversight and quality assurance throughout the duration of the contract. Day-to-day implementation will be led by our appointed Lead ECO, who will be responsible for conducting all site inspections, monitoring activities, stakeholder engagement, and the preparation of monthly and final compliance reports in alignment with the tender scope requirements.

This team structure ensures both high-level oversight and operational efficiency, enabling us to deliver a responsive and technically sound service that meets the expectations of the DFFE and MLRF.

Table 3. Line Manager Details

PERSONAL DETAILS	
Name	Nicholas Anthony Gates
Profession	Service Line Manager: Environmental Management Consulting
QUALIFICATIONS	
Tertiary Education	
Bachelor of Social Science: Environmental and Geographical Sciences <i>University of Cape Town, 2007</i>	
Accreditation and Memberships	
- Environmental Assessment Practitioners Association of South Africa, <i>Registered EAP No. 2022/4508</i> - The Institute of Waste Management of South Africa, <i>Registration No. 30116139</i> - International Association of Impact Assessment South Africa, <i>Registration No. 5535</i> - Environmental Law Association: <i>Registration No. 2018/198/WC</i>	

Table 4. Lead ECO Details

PERSONAL DETAILS	
Name	Michelle Lee
Profession	Environmental Consultant and Environmental Control Officer
QUALIFICATIONS	
Tertiary Education	
BSc Hon Marine Biology <i>University of Cape Town</i>	

BSc Applied Biology, Ecology and Evolution, Marine Biology <i>University of Cape Town</i>
Accreditation and Memberships
The Environmental Assessment Practitioners Association of South Africa: Candidate EAP 2021/4150

Table 5. Secretariat and support details

PERSONAL DETAILS	
Name	Luke Saunders
Profession	Environmental Consultant
QUALIFICATIONS	
Tertiary Education	
BSocSci. Environmental & Geographical Science <i>University of Cape Town, 2019</i> BSc Hons. Environmental Management (in progress) <i>University of South Africa, 2025</i>	
Accreditation and Memberships	
International Association for Impact Assessment South Africa (IAIAsa): Membership No 7453 Environmental Impact Practitioners Association of South Africa (EAPASA): Candidate EAP 2024/8897	

3 AUDIT APPROACH

3.1 General Approach

The ECO conducts monthly visual inspections of selected farms within the Saldanha Bay ADZ, utilising a vessel provided by one of the operators. Photographs are captured during these inspections to serve as evidence of compliance (**Annexure B**). In addition, the ECO inspects specific beaches surrounding the ADZ to identify any aquaculture-related debris that may have washed ashore.

During farm inspections, the following elements are verified in accordance with the EA, associated guidelines, and the approved EMPr:

- Number of lines or rafts in operation.
- All lines are taut and properly aligned.
- Floats are muted in colour to minimise visual impact.
- Absence of litter on barges or rafts.
- No oil or fuel slicks present around working boats.
- Unique identifying markers are present on all infrastructure.
- No excess or loose equipment on rafts or barges.
- Vessels are noted to be in good working order.

3.2 Audit Tables and Compliance Ratings

The audit table captures observations and recommendations made in relation to the conditions stipulated in the EAs and EMPrs during the reporting period. It provides the reader with more detailed information in terms of what the stipulated requirements are in relation to the organisation's assessed current compliance status, according to the observations recorded by the auditor.

Ratings are calculated based on a scoring system whereby each auditable condition is provided with a score as highlighted in **Table 6** below.

Table 6: Compliance rating and scoring.

Status	Scoring	Description
Compliant	2	<i>No improvements required</i>
Partially Compliant	1	<i>Minor improvements required</i>
Non-Compliant	0	<i>Major improvements required</i>
Work In Progress	WiP	<i>Environmental management measures are underway but not yet fully implemented or verified, requiring further monitoring and assessment.</i>
Not Applicable / Not Audited	NA	<i>No improvements required and / or the condition is either not, not yet or no longer relevant at the time of the audit.</i>
Informative	INFO	<i>These relate to informative elements that provide either useful information or are descriptive in the explanation and understanding of statements or concepts in the audit criteria.</i>

Each condition has been ascribed a colour-coded status indicator of Compliant (green), Partially Compliant (orange), non-compliant (red), Work in Progress (salmon), Not Auditable/Audited (grey) and Informative (blank/white) to assist the reader in determining aspects that require attention to improve on compliance achieved, if and where applicable. No compliance scoring is attributed any of the audit criteria information pertaining to the latter three audit status symbols, namely 'WiP', 'NA' and 'INFO' as they were either not auditable and/or were not applicable/relevant at the time the audit was undertaken. In other words, they are excluded from the overall compliance rating calculations.

An overall compliance rating is calculated as a percentage to provide the reader with an overview of compliance to the relevant audit criteria however each condition should be considered on its own merits as the ratings do not necessarily portray the severity or impact of the reported finding relating to a condition.

3.3 Site Inspections

The Saldanha Bay ADZ comprises **seventeen (17) lease areas** distributed across **three precincts**. To ensure that all farms are inspected by the ECO within an annual cycle, a subset of two to five farms are typically selected for inspection each month.

The farm inspection schedule for the period spanning from February 2025 is provided in **Table 7** below. The monthly ECO site inspection for January 2026 was conducted on the **16th of January 2026** at three lease areas in Big Bay and one lease area in Small Bay. The following farms/lease areas were inspected during the current audit period:

- Big Bay - Saldanha Bay Oyster Company,
- Big Bay - Pluto Trading and Mussels,
- Big Bay – Lagoon Aqua Farm, and
- Small Bay - AquaFoods SA.

All farms audited included an on-water inspection coupled with a verbal interview.



Figure 1. Locality map of ECO on-water inspection route with farms audited noted (created via Google Earth Pro, 2026)

Table 7. Saldanha Bay ADZ Farm Inspection Schedule. Grey blocks indicate farms that have had no farming activity or infrastructure in the water.

Farm Name	Location	Species	ECO Audits							
			February 2025	March 2025	April 2025	May 2025	October 2025	November 2025	December 2025	January 2026
African Olive Trading	Small Bay	Mussels		X					X	
AquaFoods SA	Small Bay	Mussels Oysters				X				X
Blue Ocean Mussels	Small Bay	Mussels	X						X	
Blue Sapphire Pearls	Small Bay	Mussels Oysters				X	X			
Imbaza Mussels	Small Bay	Mussels	X						X	
Saldanha Bay Oyster Company	Small Bay	Oysters					X			
Salmar Trading	Small Bay	Oysters					X			
West Coast Aquaculture	Small Bay	Mussels Oysters					X			
Ocean Grown Aquaculture	Small Bay	Mussels Oysters			X		X			
AquaFoods SA	Big Bay	Mussels								

Blue Sapphire Pearls	Big Bay	Mussels Oysters						X		
K2019005713	Big Bay	Mussels						X		
K2019005725	Big Bay	Mussels						X		
Lagoon Aqua Farm	Big Bay	Oysters								X
Madima General Agriculture Trading	Big Bay	Mussels			X					
Mika Growers	Big Bay	Mussels			X			X		
Pluto Mussels and Trading	Big Bay	Mussels			X					X
Saldanha Bay Oyster Company	Big Bay	Oysters						X		X
Ocean Grown Aquaculture	Big Bay	Mussels Oysters						X		

Please note: ECO inspections conducted from February 2025 to May 2025 were audited by the previously appointed ECO (*Anchor Research & Monitoring (Pty) Ltd*). Additionally, NCC has been advised that due to a delay in appointment processes, no ECO was appointed between the June 2025 and September 2025 period, however an oversight role was performed by the DFFE project team during this period.

Additionally, in respect of Table 7 above, lease areas where marine rights have been revoked or denied, or where no infrastructure is present in the water, have been removed from the table.

3.4 Consultations and Communications

The approach of consultation followed during the environmental audit was based on written (email) and telephonic correspondence between the ECO/auditor, the Proponent, ADZ farm operators and relevant stakeholders which also includes communication with the competent authority ("**CA**") in terms of report submission.

3.4.1 Consultations

The following consultations were undertaken during the audit period:

- 16th of January 2026 – Consultation was held with aquaculture operators in the ADZ of the following lease areas and their representatives, followed by an on-water inspection:
 - Big Bay - Saldanha Bay Oyster Company,
 - Big Bay - Pluto Trading and Mussels,
 - Big Bay – Lagoon Aqua Farm, and
 - Small Bay - AquaFoods SA.

- 14th of January 2026 to the 15th of January 2026 - Farm Monitoring Reports were received from the various aquaculture operators in the ADZ.
- 26th of January 2026 – AMC meeting was conducted online.

Please note that no information was requested by the CA during the audit period.

3.4.2 Communications

Communications received by the Saldanha Bay ADZ ECO during the audit period (January 2026) are summarised in **Table 8** below.

Table 8. Communications received by the ECO during the audit period

Individual	Organisation	Subject
Mauritz Viljoen	Saldanha Bay Oyster Company	Farming of oysters on SBOC Big Bay Farm
Tiishetso Maswanganye	Blue Ocean Mussels	Follow-up: November FMR
Kobus Niewoudoudt	Lagoon Aqua Farm	Follow-up: Saldanha ADZ Incident observed at Lagoon Aqua Farm - Big Bay
Nadia Du Toit	Lagoon Aqua Farm	Saldanha ADZ ECO Inspection - January 2025. Closure of farm
Mauritz Viljoen	Saldanha Bay Oyster Company	Saldanha ADZ ECO Inspection - January 2025
Michelle Pretorius	DFFE: Operation Phakisa Aquaculture Delivery Unit	Saldanha ADZ - SBOC (BB) Request to Farm Oysters
Jess Dawson	Anchor Research and Monitoring	Saldanha Bay ADZ AMC meeting - Epifaunal Reef Survey Report Presentation
Portia Dwane	DFFE: Sustainable Aquaculture Management	Closure Inner Bay Farms- E. coli exceeded the limit
John Foord	DFFE: Sustainable Aquaculture Management	Closure Inner Bay Farms- E. coli exceeded the limit
Pat Bopape	SANPARKS	Saldanha Bay ADZ Availability of November 2025 ECO Summary Report
Maxhoba Jezile	DFFE: Sustainable Aquaculture Management	Saldanha ADZ Lagoon Aqua FMR
Ethel Coetzee	Transnet National Ports Authority	RE: Saldanha Bay ADZ Follow-up on Action Item - Beach clean-up infrastructure
John Foord	DFFE: Sustainable Aquaculture Management	PAH Saldanha Bay 22/12/2025
Michelle Pretorius	DFFE: Operation Phakisa Aquaculture Delivery Unit	Saldanha Bay ADZ Reminder to submit Farm Monitoring Reports
Hendré van Rensburg	Anchor Research and Monitoring	Saldanha Bay ADZ AMC meeting - Epifaunal Reef Survey Report Presentation

Mellissa Naiker	Department of Environmental Affairs and Development Planning: Biodiversity and Coastal Management	Notice of resignation as a member of the Saldanha Bay ADZ AMC
Tiishetso Maswanganye	Blue Ocean Mussels	Saldanha ADZ Broken Raft

4 GENERAL (NOTABLE EVENTS)

4.1 General Outstanding Matters

Any matters of concern or outstanding matters are to be recorded and summarised in the Communications Register (**Annexure A**).

The register makes provision for the number of concerns noted and distinguishes between the number of outstanding or open items and closed-out items. Any unresolved conditions will roll-over to the next reporting period and will be removed once resolved.

There are no outstanding concerns raised for this audit period.

4.2 Change in Infrastructure

4.2.1 Saldanha Bay Oyster Company (Big Bay) – Movement of Lines

New infrastructure, including top ropes, mooring blocks and risers, was installed at the farm during the reporting period. The infrastructure was newly introduced (not transferred from another farm) and was installed on the 1st of December 2025 and on the 10th of December 2025. The infrastructure was placed on Lines 7 and 8.

4.3 Farm Maintenance Plan Feedback

No updates to note during this reporting period.

4.4 Conservation of Fauna

In accordance with the approved EMPr, aquaculture operators are required to conduct daily visual observations to monitor potential interactions between marine animals and farm infrastructure. These observations are undertaken either from vessels during weekdays or from shore using binoculars (typically on weekends and public holidays when boats are not operating on the farms).

Operators submit visual observation logs to the ECO monthly to verify that all three precincts within the ADZ have been adequately monitored.

The data presented in **Table 9** below reflects the information submitted for the month preceding the reporting period.

Table 9. Precinct observations verified for December 2025.

Date	ADZ Precinct		
	Small Bay	Big Bay	North Bay
01/12/2025	✓	✓	No observations have been conducted by the aquaculture operators in the ADZ for North Bay from the 12/11/2025 onwards.
02/12/2025	✓	✓	
03/12/2025	✓	✓	
04/12/2025	✓	✓	
05/12/2025	✓	✓	
06/12/2025	✓	✓	
07/12/2025	✓	✓	
08/12/2025	✓	✓	
09/12/2025	✓	✓	
10/12/2025	✓	✓	
11/12/2025	✓	✓	
12/12/2025	✓	✓	
13/12/2025	✓	✓	
14/12/2025	✓	✓	
15/12/2025	✓	✓	
16/12/2025	✓	✓	
17/12/2025	✓	✓	
18/12/2025	✓	✓	
19/12/2025	✓	✓	
20/12/2025	✓	✓	
21/12/2025	✓	✓	
22/12/2025	✓	✓	
23/12/2025	✓	✓	
24/12/2025	✓	✓	
25/12/2025	✓	✓	
26/12/2025	✓	✓	
27/12/2025	✓	✓	
28/12/2025	✓	✓	
29/12/2025	✓	✓	
30/12/2025	✓	✓	

Operators are required to record and report any sightings of marine fauna, including endangered, threatened, or protected (“**ETP**”) species, as part of their routine monitoring. These observations are submitted to the ECO on a monthly basis to ensure that all precincts are effectively monitored and potential impacts on marine wildlife are documented.

During the month of **January 2026**, the following aquaculture operators in the ADZ submitted faunal observations recorded within the previous month to the ECO:

- Ocean Grown Aquaculture; and

- Imbaza Mussels

Table 10 and **Table 11** below provide a summary of the observations provided per precinct.

Table 10. Faunal Observations made within the Saldanha Bay ADZ by Ocean Grown Aquaculture from 01/12/2025 to 19/12/2025

Faunal Species	Number of Observations within Saldanha Bay ADZ Precinct			
	Small Bay	Big Bay	Outer Bay North	Alongside
Common Dolphin		5		
Cape Fur Seal	7	37		1
Cape Ganet		>90		
African Penguin		2		

Table 11. Faunal Observations made within the Saldanha Bay ADZ by Imbaza Mussels from the 01/12/2025 to the 24/12/2025

Faunal Species	Number of Observations within Saldanha Bay ADZ Precinct			
	Small Bay	Big Bay	Outer Bay North	Outer Bay South
Common Dolphin		N/A		
Cape Fur Seal	25			
Cormorant, Cape	85			
Gull, Kelp	226			
Gull, Hartlaub's	117			
Oyster Catcher	34			

Note: It is noted that the above records represent a cumulative count of individuals observed during the reporting period. As such, this figure is unlikely to reflect the total number of unique individuals recorded for the month, as some may have been counted repeatedly on different days

5 BEACH INSPECTIONS

5.1 Beach Monitoring by Operators

Through the BSASA, four members of the aquaculture industry have committed to conducting regular beach monitoring and clean-ups across the three precincts of the ADZ, namely Small Bay, Big Bay, and Outer Bay North, effective from 8 September 2022.

The ECO provides a standardised feedback template to participating operators to record waste volume estimates, dominant waste types, and the proportion of waste attributable to aquaculture debris. Beach clean-up feedback is submitted the following month to ensure that data reflects a full month's collection period.

While comprehensive waste data is routinely received for Small Bay, Big Bay, and Outer Bay North, detailed feedback for Marcus Island has not been consistently provided to date, aside from photographic evidence submitted in September 2022. Given the prevailing swell and current direction, minimal aquaculture-related waste has been reported to accumulate on Marcus Island. This has been evidenced within the recent ECO beach inspection monitoring conducted during the reporting period (see below).

Opportunistic visual inspections were conducted by the previously appointed ECO from a vessel en-route to Big Bay during the October and November 2024 site visits. Formal beach inspections were carried out in May 2025 and November 2025.

Table 12. Members of Aquaculture Industry committed to beach monitoring and clean-up as required by EMPr conditions 1 and 2 of Table 7-1.

Responsible Party	Group/Affiliation	Precinct	Beach	Frequency
Wayne Maree	AquaFoods SA	Big Bay	Spreeuwalle – Paradise Beach	Twice a month
Mauritz Viljoen	Ocean Grown Aquaculture	Big Bay	Spreeuwalle – Paradise Beach	Bi-weekly
		Outer Bay North	West and Eastern Beach	Monthly
Vos Pienaar	Imbaza Mussels	Small Bay	Small Bay Northern beaches (Hoedjies Bay to Moss gas)	Weekly
SJ Poggenpoel	Blue Ocean Mussels (BOM)	Small Bay	Marcus Island – Small Bay side	Monthly

The ECO received beach clean-up data for December 2025 for clean ups from the following operators:

- Ocean Grown Aquaculture - Big Bay (Spreeuwalle and area next to Transnet Quay) and Inner Bay (Bluewater Bay)
- Imbaza Mussels - Small Bay

The following was noted:

- 13 floats were found on the rocks next to the Transnet Quay up to Spreeuwalle beach
- 4 floats were found adjacent to Transnet within Big Bay,

- 3 broken crates and 14 plastic bottles were found adjacent to Transnet within Big Bay
- 5 floats were found in Bluewater Bay.
- 24 bags of waste were collected on Northern Beach (Small Bay). The majority waste type collected on Northern Beach (Small Bay) was noted to be general litter with ~5% attributed to the aquaculture industry, mainly being rope offcuts.

Please refer to **Figure 17** to **Figure 20** for photographic evidence.

The ECO noted that no beach monitoring of Outer Bay North occurred during the December 2025 period. It is understood this is due to all lease areas within the area being decommissioned and no farming activity occurring. Additionally, records for Small Bay lacked information pertaining to location, photographic evidence and date of beach inspections. Furthermore, the ECO advises that “before” and “after” images should always be taken to ensure proper documentation of the site conditions prior and after cleanup activities. It is noted that no beach cleanup information has been received for Marcus Island or the TNPA port breakwater area.

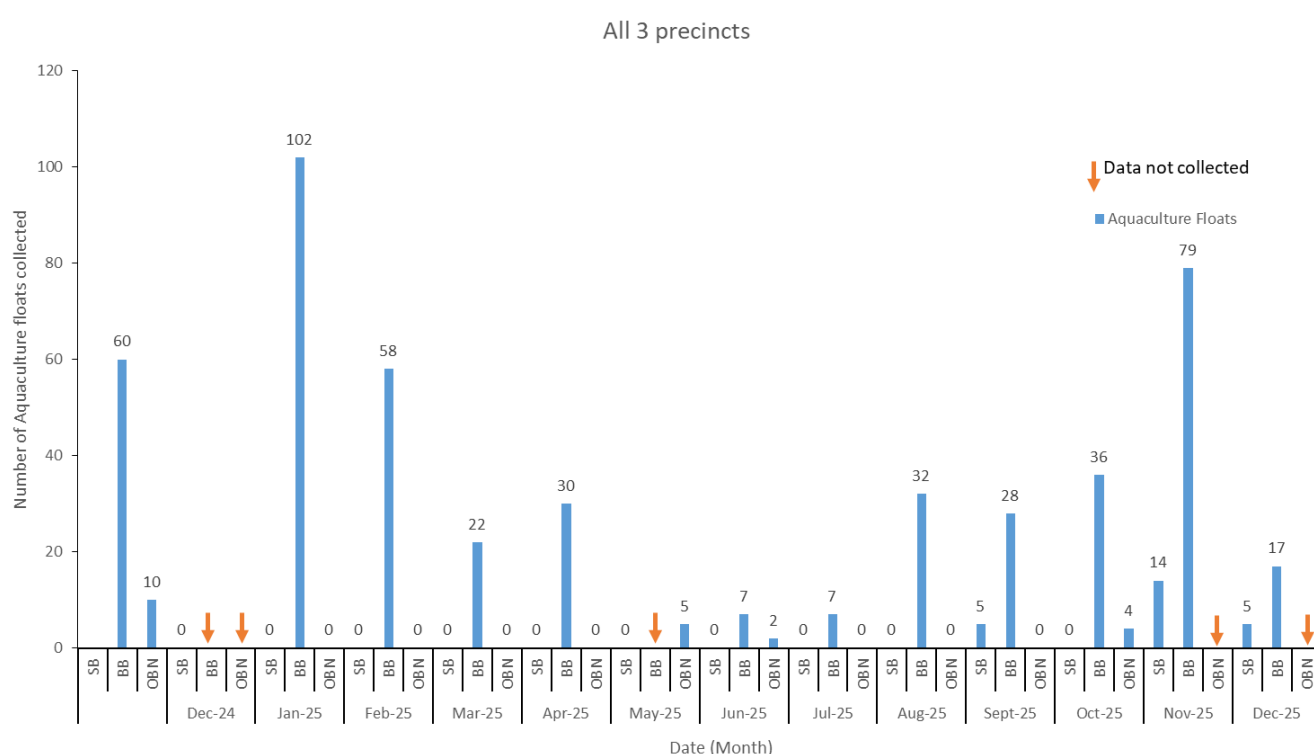


Figure 2. Floats collected from beaches in various precincts. Orange arrows indicate absence of reporting.

5.2 Beach Monitoring by the ECO

The ECO conducted spot beach inspection at Northern beach, adjacent to Small Bay, on the 16th of January 2026. The following observations were made during the inspections:

- 1 aquaculture float was observed along the beachfront, in front of Blue Bay lodge. The floats did not display unique identifying markers (label nor cable tie).
- Several rope offcuts were observed within the shoreline of the beachfront. These were small rope offcuts only.

Please refer to **Figure 21** to **Figure 26** for photographic evidence.

The ECO acknowledges that members of the Saldanha Bay community also take responsibility for maintaining the cleanliness of the beaches by collecting and depositing aquaculture infrastructure into the waste receptacles provided along the beachfront.

The ECO further highlights that the amount of aquaculture-related waste observed along the beachfront is significantly less than that recorded in October 2025. The operators responsible for beach cleaning are commended on the improved condition of the area and are encouraged to continue these efforts.

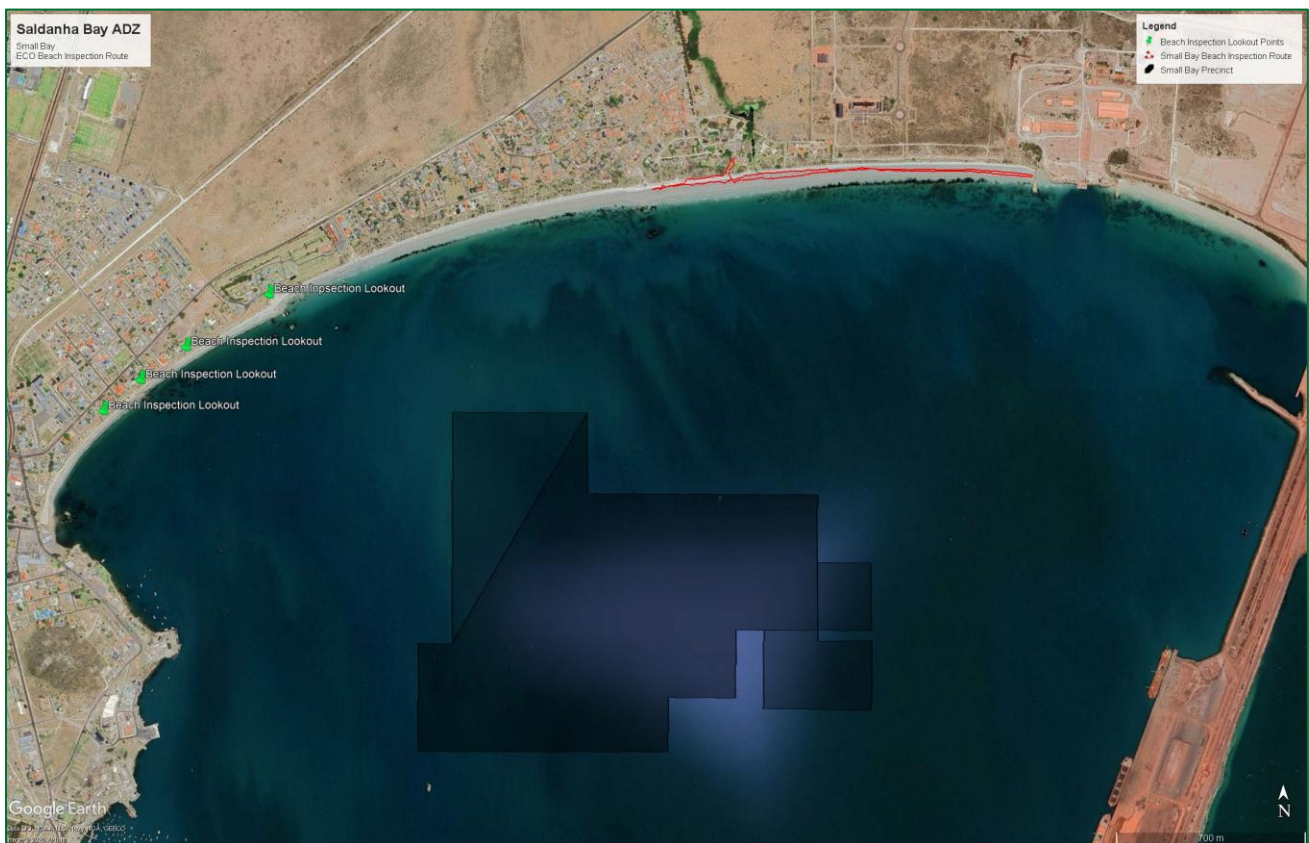


Figure 3. Beach inspection route conducted by ECO during January 2026 noted in red with lookout points noted in green (created via Strava and Google Earth Pro, 2026)

6 INCIDENTS AND ACCIDENTS

All environmental related events, incidents and accidents are to be reported directly to the ECO and kept on a central register. An environmental incident register is in place.

During the reporting period the following is noted:

- No incidents were reported during the December 2025 reporting period.
- On the 10th of September 2025, the 14B south mooring at AquaFoods SA Farm was reported to come loose from a shackle at the block while harvesting of the line was being undertaken. No environmental damage was observed. The operator initially tied the affected mooring to the adjacent 13b mooring. The ECO has followed up with the relevant operator to confirm if the mooring shackle has been repaired. Feedback is still awaited from the operator.
- On the 17th of October 2025, the ECO was made aware of an oyster line on Lagoon Aqua Farm being observed out of place and bundled up due to the north riser line breaking off. The ECO communicated this with the relevant operator and was advised on the 23rd of October 2025 and the 17th of November 2025 that the Operator is attending to the broken line with a two-week remediation timeframe required to remove the stock and fix the line. Within January 2026, the ECO has been advised that the aquaculture farm has closed with all infrastructure removed from the lease area. This was confirmed by the ECO during the on-water site inspections conducted within the audit period. A decommissioning plan was not received by the ECO nor the DFFE from the Lagoon Aqua Farm operator.

No NEMA section 30 environmental incident/s were reported during this audit period.

7 DECOMMISSIONING PLANS

Southern Atlantic Sea Farms and Southern Cross Sea Farms has completed all decommissioning activities within the Outer Bay North precinct. Confirmation of removal of all infrastructure has been received by Ocean Grown Aquaculture on the 03rd of November 2025.

The following farms are currently in various stages of decommissioning (as per communications received on the 03rd of November 2025):

- Southern Atlantic Sea Farms (Big Bay): **Eleven (11)** lines remain in the water and are yet to be removed. Additionally, twenty-two (22) of the 3.2 tons blocks and twenty-two (22) of the 1.2 ton sleeper packs are still required for removal.
- K2019005713 (Big Bay): The submitted Farm Monitoring Report indicates that **six (6)** dormant lines remain in the water. Additionally, fourteen (14) of the 3.2 tons blocks and fourteen (14) of the 1.2 ton sleeper packs are still required for removal.
- K2019005725 (Big Bay): The submitted Farm Monitoring Report indicates that **seven (7)** dormant lines remain in the water. Additionally, fourteen (14) of the 3.2 tons blocks and fourteen (14) of the 1.2 ton sleeper packs are still required for removal.

The ECO has further been advised that the relevant farm operator is currently busy focusing decommissioning and relocation of infrastructure to the following lease areas:

- Saldanha Bay Ocean Company (SBOC) in Big Bay,
- Ocean Grown Aquaculture (previously West Coast Oyster Growers) in Big Bay, and
- West Coast Aquaculture in Small Bay.

All the recovered 3.2T blocks have been used for current line installations. For all future line installations operators will be casting new mooring blocks (6 Tons).

No further updates on the decommissioning activities were received in January 2026.

7.1 Lagoon Aqua non-compliance

On the 12th of January 2026, the ECO was advised that the operator of the Lagoon Aqua lease area had closed the aquaculture farm and removed all infrastructure from the water. This was confirmed during the January 2026 site inspection, during which the ECO verified that no top structures or on-water infrastructure were visible within the lease area.

However, no decommissioning plan was submitted by the operator. This constitutes a non-compliance with the EMPr and has been raised with the AMC for discussion. The ECO is currently in the process of drafting a letter of non-compliance for submission to the operator.

Please refer to **Figure 8** to **Figure 10** for photographic evidence confirming the absence of infrastructure within the lease area.

8 FARM MONITORING REPORTS

All aquaculture operators are required to complete and submit Farm Monitoring Reports (“**FMRs**”) by the 15th of each month for the preceding reporting period. Each submission must be accompanied by supporting verification documentation (such as invoices or other records) to confirm production figures.

A separate FMR is required for each farmed product and for every precinct in which an operator is active. Accordingly, the feedback presented below reflects the total number of FMRs submitted across the various precincts and product types.

As of the 27th of January 2026, a total of fifteen Farm Monitoring Reports were received on time with one being outstanding. Seven lease areas reported no harvesting occurred and 22 lease areas had no activity due to either being decommissioned (or in the process thereof) or never commencing with activities.

Note: In respect of Table 14 below, lease areas where marine rights have been revoked or denied, or where no infrastructure is present in the water, have been removed from the table.

Table 13. FMR submission status, supporting production - verification documents and visual inspection logs. Late submissions, lack of supporting documents and not providing visual logs are highlighted in red.

Farm Name	Location	Species	Date	Supporting Documentat ion	Visual Inspection Log	Notes
African Olive Trading	Small Bay	Mussels	15/01/2026	No	Yes	Last harvesting day was on 27 October 2025. Farm reopened on 5 January 2026.
AquaFoods SA	Small Bay	Mussels Oysters	14/01/2026	Yes	Yes	-
Blue Ocean Mussels	Small Bay	Mussels	15/01/2026	Yes	Yes	-
Blue Sapphire Pearls	Small Bay	Mussels Oysters	15/01/2026	Yes	Yes	-
Blue Sapphire Pearls	Big Bay	Mussels Oysters	15/01/2025	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Imbaza Mussels	Small Bay	Mussels	14/01/2026	No	Yes	-
K2019005713	Big Bay	Mussels	Decommissioning in progress. However, FMR has been received on 14/01/2026.			
K2019005725	Big Bay	Mussels	Decommissioning in progress. However, FMR has been received on 14/01/2026.			
Lagoon Aqua Farm	Big Bay	Oysters	Outstanding at the time of compiling this report.	No	No	The ECO has been advised that the farm is closed.
Mika Growers	Big Bay	Mussels	14/01/2026	Yes	Farm observations vested in Ocean Grown Aquaculture group.	

Pluto Mussels and Trading	Big Bay	Mussels	14/01/2026	No farm sales reported.	No	-
Saldanha Bay Oyster Company	Small Bay	Oysters	14/01/2026	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Saldanha Bay Oyster Company	Big Bay	Mussels	14/01/2026	Yes		
Salmar Trading	Small Bay	Oysters	14/01/2026	Yes	Yes	-
Southern Atlantic Sea Farms 2	Big Bay	Mussels	No farming activity. Farm has been decommissioned. However, FMR has been received on 14/01/2026.			
West Coast Aquaculture	Small Bay	Mussels Oysters	14/01/2026	Yes	Farm observations vested in Ocean Grown Aquaculture group.	
Ocean Grown Aquaculture	Big Bay	Mussels Oysters	14/01/2026	Yes		
Ocean Grown Aquaculture	Small Bay	Mussels Oysters	14/01/2026	Yes		

9 OPERATOR COMPLIANCE WITH THE EA AND EMPR

As noted above, the ECO audited four aquaculture farms within the Big Bay and Small Bay ADZ Precincts in the January 2026 audit period. The information summarises the inspection observations and interview responses noted.

Aquafoods SA (Small Bay)

- Approved for 21 mussel longlines and 7 oyster longlines.
- 20 mussel longlines observed. 4 dormant mussel lines observed.
- 7 oyster longlines observed.
- All lines were observed taut and properly aligned.
- No excess or loose infrastructure observed.
- Floats are blue in colour to minimise visual impact. End floats noted to be bright orange,
- No litter or diesel/oil spills were noted within the farm boundaries.
- Unique identifying markers in the form of red farm labels ("AF") on end buoys observed.
- ECO was advised that farm utilises red ribbon as another unique identifying marker. Not observed during inspection.

Please refer to **Figure 14** to **Figure 16** for photographic evidence.

Lagoon Aqua (Big Bay)

- No on-water infrastructure observed in the lease area.
- The ECO or EA holder was not provided with a decommissioning plan.

As a result of the above, a letter of non-compliance is being issued to the aquaculture operator. The matter was further raised to the AMC for discussion.

Please refer to **Figure 8** to **Figure 10** for photographic evidence.

Pluto Mussels and Trading (Big Bay)

- Approved for 11 mussel longlines.
- 6 mussel longlines observed.
- Lines were observed to be curved in the water. This is not deemed a concern for this lease area as the farm is noted to be a 'seed farm' with different weighting characteristics.
- No excess or loose infrastructure observed.
- Floats are black in colour to minimise visual impact.
- No litter or diesel/oil spills were noted within the farm boundaries.
- Unique identifying markers in the form of white farm labels ("P") on buoys observed.

Please refer to **Figure 5** to **Figure 7** for photographic evidence.

Saldanha Bay Oyster Company (Big Bay)

- Approved for 34 mussel longlines.
- 20 mussel longlines observed. 5 dormant lines observed.
- All lines were observed taut and properly aligned.
- No excess or loose infrastructure observed.
- Floats are black in colour to minimise visual impact.
- No litter or diesel/oil spills were noted within the farm boundaries.
- Unique identifying markers in the form of white farm labels ("SBOC") on buoys observed. White cable ties also attached to buoys/floats as unique identifying marker.
- Pilot oyster stack observed removed from the water.

Please refer to **Figure 11** to **Figure 13** for photographic evidence.

9.1 Waste Management

Waste continues to be appropriately managed across the ADZ. General waste is collected and stored in municipal black bins with lids and removed on a weekly basis by the local municipality. In some cases, solid waste is transported directly to the Saldanha Bay Landfill Facility for proper disposal. No solid waste or litter was observed on the Pepper Bay Jetty.

In addition, operators have explored opportunities for the beneficial reuse of biological waste in alternative markets. These initiatives include the potential use of bio-waste materials in road construction and as filtration media in aquaculture and fish-keeping systems.

Records of waste generation and disposal are noted within the monthly FMRs submitted by the aquaculture operators in the ADZ to the ECO.

9.2 Audit compliance and Findings

In terms of the findings and results of the **January 2026** ECO audit, the project achieved an overall **94.53%** compliance rating with the conditions of the EAs and EMPs.

Table 14: January 2026 Audit Compliance

SUMMARY OF RESULTS										
No.	COMPLIANCE WITH:	Compliant	Partially Compliant	Non-Compliant	Not Applicable / Not Audited	Work in Progress	Informative	Number of Conditions	Audit Score	Audit Compliance %
		2	1	0	NA	WiP	INFO			
1	Environmental Authorisation: Sea Based Aquaculture Development Zone (ADZ) in Saldanha Bay Within Saldanha Local Municipality in the Western Cape	63	1	1	34	0	12	111	127	98%
2	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Operational Phase	69	2	0	74	2	3	150	140	99%
3	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Decommissioning Phase	9	0	2	0	1	0	12	18	81.8%

4	Environmental Management Programme for the Saldanha Bay Aquaculture Development Zone: June 2022 – Environmental Monitoring and Corrective Action	16	0	0	8	0	0	24	32	100.0%
TOTAL		157	3	3	116	3	15	297	317	94.53%
Total Score		314	3	0	NA	NA	NA			

9.2.1 Minor improvements required

- Lines are to be straight and taut in the water.
- Visual inspection logs are to be supplied to the ECO by all aquaculture operators in the ADZ.
- Supporting documentation for farm sales are to be provided to the ECO by all aquaculture operators in the ADZ.
- More accurate beach clean-up data is to be collected with accompanying location and photographs captured. **This is noted as a repeated recommendation**
- All farm incidents are to be documented and closed out as soon as possible with evidence provided to the ECO. **This is noted as a repeated recommendation.**
- All aquaculture operators within the ADZ are to ensure that the unique identifying markers are present and visible on all floats and buoys.

9.2.2 Major improvements required.

- The EA Holder should continue engagements with Transnet National Ports Authority ("**TNPA**") to ensure 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.
- The ECO is to be informed of all infrastructure modifications, additions, removals and/or decommissioning by the relevant aquaculture operator in the ADZ at least two weeks prior to implementation or as required.
- Beach clean-ups within the TNPA port boundaries, adjacent to Marcus Island and the breakwater should re-commence by the relevant aquaculture operators in the ADZ.

9.2.3 Summary of Compliance with the EA and EMPr

This section provides an overview of the ECO's assessment of compliance with the conditions of the EA and the approved EMPr over the preceding audit periods. Compliance scores and percentages from previous ECO audits are summarised to illustrate trends in environmental performance, highlight areas of consistent adherence, and note intervals requiring improvement.

For context, the conditions assessed by the previous ECO and the current NCC ECO are not directly comparable, as NCC identified a substantially larger set of 297 auditable conditions, whereas the previous ECO assessed only 27; therefore, the figures presented reflect different audit scopes rather than a change in compliance performance.

Table 15. Historic compliance with the EA and EMPr

Audit Date	Total Applicable Conditions	Compliance Percentage (%)	Compliant	Partially Compliant	Non-Compliant	Not Applicable / Not Audited	Work in Progress	Informative
21/01/2025	24	83	20	4	0	3	N/A	N/A
11/02/2025	24	92	22	2	0	3	N/A	N/A
25/03/2025	24	92	22	2	0	3	N/A	N/A
29/04/2025	24	92	22	2	0	3	N/A	N/A
21/05/2025	24	92	22	2	0	3	N/A	N/A
No ECO audits were conducted between June 2025 and September 2025								
14/10/2025	164	95.98%	157	3	3	118	1	15
11/11/2025	162	99.8	160	1	2	116	3	15
18/12/2025	163	99.07%	160	1	2	116	3	15
16/01/2026	163	94.53	157	3	3	116	3	15

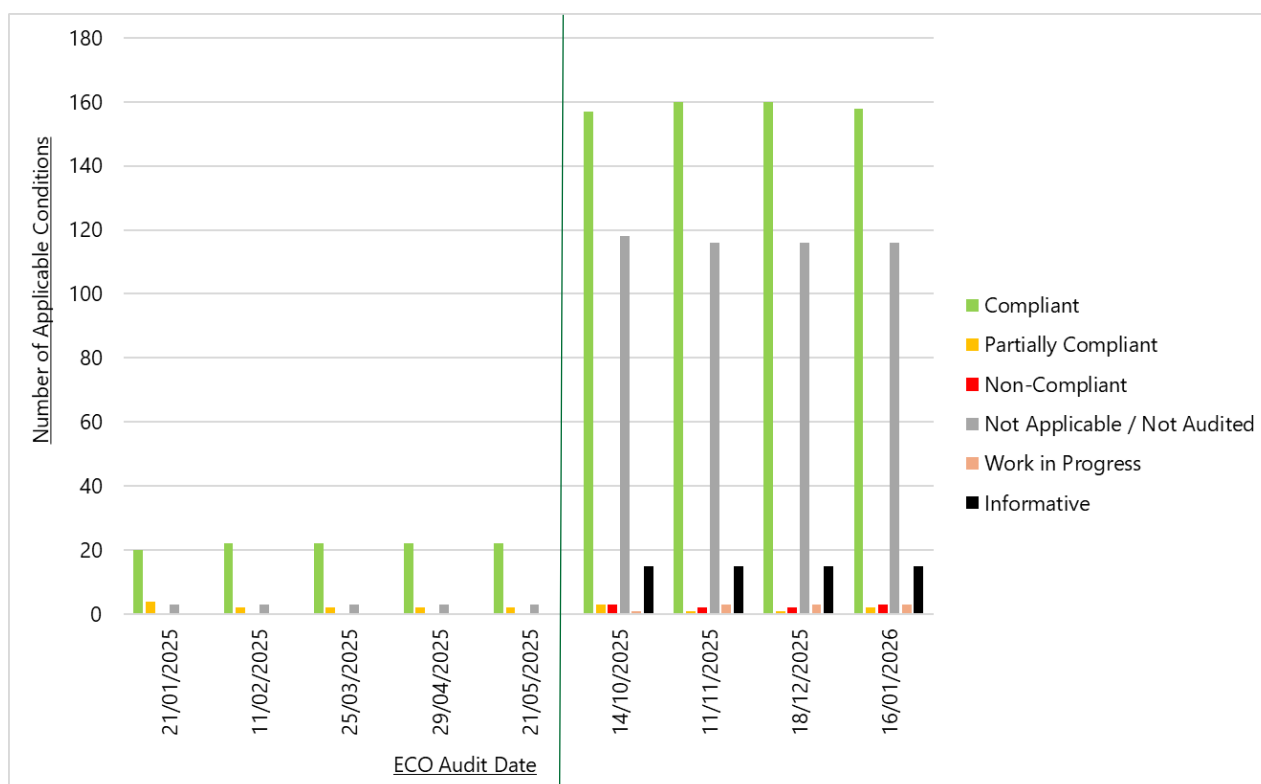


Figure 4. Historic compliance upheld by the Saldanha ADZ. Green line denotes when NCC was appointed as ECO.

For context, the conditions assessed by the previous ECO and the current NCC ECO are not directly comparable, as NCC identified a substantially larger set of 297 auditable conditions, whereas the previous ECO assessed only 27; therefore, the figures presented reflect different audit scopes rather than a change in compliance performance.

10 RECOMMENDATIONS AND CONCLUSION

10.1 Recommendations

The following recommendations are made by the ECO for the consideration of the DFFE: Fisheries Management

- The EA Holder should continue engagements with Transnet National Ports Authority ("TNPA") to ensure 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.
- The ECO is to be informed of all infrastructure modifications, additions and/or removals by the relevant aquaculture Operator in the ADZ at least two weeks prior to implementation.
- Beach clean-ups within the TNPA port boundaries, adjacent to Marcus Island and the breakwater should re-commence by the relevant aquaculture operators in the ADZ.
- Visual inspection logs are to be supplied to the ECO by all aquaculture operators in the ADZ.
- Supporting documentation for farm sales are to be provided to the ECO by all aquaculture operators in the ADZ.

- More accurate beach clean-up data is to be collected with accompanying location and photographs captured. This is noted as a repeated recommendation
- All farm incidents are to be documented and closed out as soon as possible with evidence provided to the ECO. This is noted as a repeated recommendation.
- All aquaculture operators within the ADZ are to ensure that the unique identifying markers are present and visible on all floats and buoys.

10.2 Conclusion

NCC Environmental Services (Pty) Ltd was appointed as the Environmental Control Officer for the Saldanha Bay Aquaculture Development Zone for the period from the 07th of October 2025 to the 06th of February 2026. On the 16th of January 2026, the ECO conducted on-water inspections of one lease area in Small Bay and three lease areas in Big Bay. No litter or oil spills were observed during the audit, and all lines were to be well floated, taut and straight excluding Pluto Mussels and Trading. However, this lease area is noted to be a seed farm and has different weight characteristics than production farms. Unique identifying markers in the form of farm labels and cable ties were observed on floats and end buoys.

No incidents were reported during the January 2026 reporting period. However, the ECO requires feedback and status updates on one incident reported during the previous audit period. It is understood that the operator is awaiting repair parts.

Change in infrastructure was noted for Saldanha Bay Oyster Company in Big Bay with new infrastructure, including top ropes, mooring blocks and risers, was installed at the farm during the reporting period. The infrastructure was newly introduced (not transferred from another farm) and was installed on the 1st of December 2025 and on the 10th of December 2025. The infrastructure was placed on Lines 7 and 8.

On the 12th of January 2026, the ECO was advised that the operator of the Lagoon Aqua lease area had closed the aquaculture farm and removed all infrastructure from the water. This was confirmed during the January 2026 site inspection, during which the ECO verified that no top structures or on-water infrastructure were visible within the lease area. However, no decommissioning plan was submitted by the operator. This constitutes a non-compliance with the EMPr and has been raised with the AMC for discussion. A letter of non-compliance is being issued to the Operator by the ECO.

Beach clean-up data for December 2025 was received for Big Bay, Inner Bay and Bluewater Bay and Small Bay. The data indicates that aquaculture-related debris, including floats, broken crates and rope offcuts, continues to be present along portions of the coastline, particularly within Big Bay and Bluewater Bay, while waste collected at Small Bay was predominantly general litter with a minor proportion attributed to aquaculture activities. No beach monitoring was undertaken in Outer Bay North due to the decommissioning of lease areas and the

absence of farming activities. The ECO further notes gaps in the submitted records, including missing location details, dates and photographic evidence, and emphasises the need for consistent “before” and “after” photographs to adequately document clean-up activities. No beach clean-up information was received for Marcus Island or the TNPA port breakwater area during the reporting period.

The ECO conducted a spot beach inspection at Northern Beach, adjacent to Small Bay, on the 16th of January 2026. The inspection identified one unmarked aquaculture float along the beachfront in front of Blue Bay Lodge, as well as several small rope offcuts within the shoreline area. The ECO acknowledges the role played by members of the Saldanha Bay community in maintaining beach cleanliness by collecting and disposing of aquaculture-related debris in the designated waste receptacles. Notably, the quantity of aquaculture-related waste observed during this inspection was significantly lower than that recorded in October 2025. The operators responsible for beach cleaning are commended for the improved condition of the beachfront and are encouraged to continue these efforts.

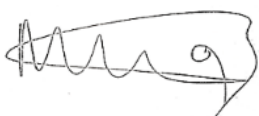
As of the 27th of January 2026, a total of fifteen Farm Monitoring Reports were received on time with one being outstanding. Seven lease areas reported no harvesting occurred and 22 lease areas had no activity due to either being decommissioned (or in the process thereof) or never commencing with activities.

Overall, environmental compliance within the Saldanha Bay ADZ remains high, with operators demonstrating continued commitment to environmental management and reporting. Minor administrative improvements in record-keeping, photographic documentation, and timely submission of FMRs are recommended to further strengthen compliance consistency and environmental performance.

10.3 Evaluation of EMPr

In the opinion of the ECO, no amendments to the EMPr are required at this stage, as the current measures remain adequate to ensure the continued avoidance, management, and mitigation of environmental impacts. Furthermore, the ECO does not recommend any changes to the EMPr to maintain compliance with the conditions of the EA.

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NCC Environmental Services (Pty) Ltd

ANNEXURE A – CONCERNS/COMPLAINTS REGISTER

Open Concerns/Complaint

No	Observation date	Concern/Complaint	Suggested Due Date ¹	Proposed Corrective Action	Status	Closure status

Closed Concerns

No	Observation date	Concern/Complaint	Due Date suggested by ECO	Corrective Action Taken	Outcome	Closure status
001	November 2025	The ECO is awaiting feedback on the status of remediation for the incident reported on the 10/09/2025.	Immediately	Advise ECO on status of remediation	Closed	The ECO was advised that the farm has closed with all infrastructure removed from the water.

ANNEXURE B – PHOTOGRAPHS

Pluto Mussels and Trading – Big Bay Precinct



Figure 5. Mussel longline with floats marked with a letter “P”. Floats black in colour to limit visual disturbance.



Figure 6. Two mussel longlines observed with floats marked with a letter “P”. Floats black in colour to limit visual disturbance.



Figure 7. Mussel longlines observed to be curved in the water.

Lagoon Aqua – Big Bay Precinct



Figure 8. No on-water infrastructure observed within lease area.



Figure 9. No on-water infrastructure observed within lease area.

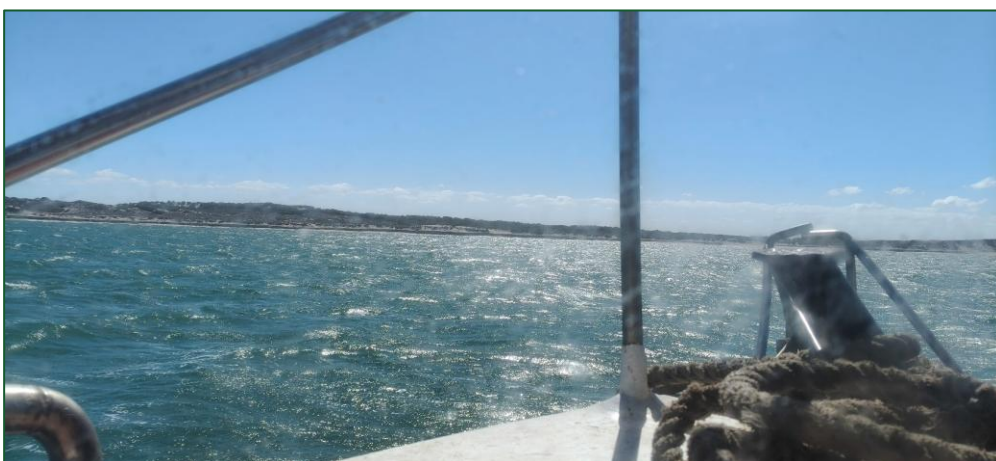


Figure 10. No on-water infrastructure observed within lease area.

Saldanha Bay Oyster Company – Big Bay Precinct



Figure 11. Lines observed to be straight with end buoys well floated.



Figure 12. End floats labelled with farm name and float sequence number ("33 SBOC")



Figure 13. White cable ties observed on floats as unique identifying marker.

Aquafoods SA – Small Bay Precinct



Figure 14. Lines observed to be straight with buoys well floated.



Figure 15. Line with broken shackle tied to adjacent mooring and awaiting repair.



Figure 16. End floats labelled with farm name ("AF")

Beach cleanup activities undertaken by aquaculture operators in the ADZ



Figure 17. Captured 12/12/2025 - Before



Figure 18. Captured 12/12/2025 - After



Figure 19. Captured 15/12/2025



Figure 20. Captured 17/12/2025

Beach Inspection undertaken by the ECO



Figure 21. Tyre found along Saldanha Bay Beach



Figure 22. Rope offcut found along Northern Bay beachfront

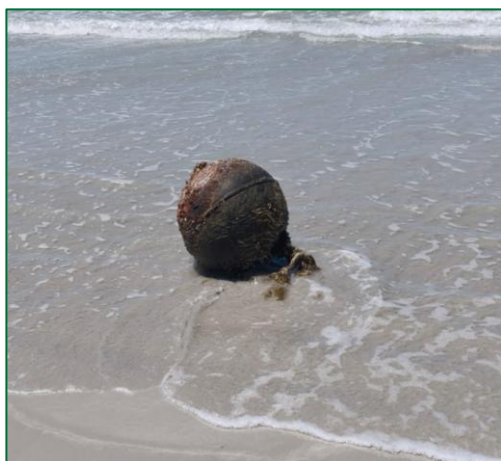


Figure 23 Unmarked buoy observed in front of Blue Bay Lodge.



Figure 24. Rope offcut found along Northern Bay beachfront



Figure 25. Rope offcut found along Northern Bay beachfront

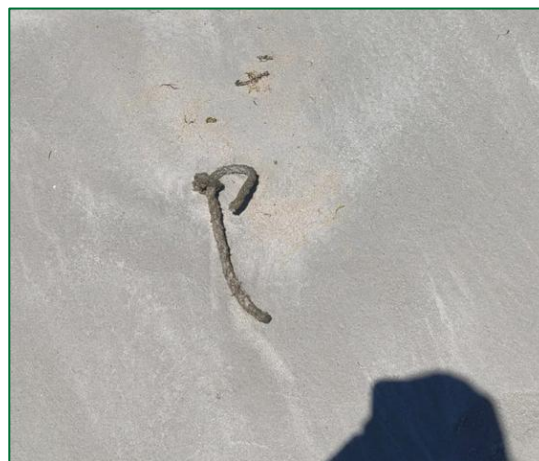


Figure 26. Rope offcut found along Northern Bay beachfront