

Save Langebaan Lagoon Action Group
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The Department of Environment, Forestry and Fisheries
473 Steve Biko & Soutpansberg Roads,
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Private Bag X447,
Pretoria, 0001
25 September 2020

For Attention:

Ms Barbara Creecy (Minister of Environment, Forestry and Fisheries)
Ms Maggie Sotyu (Deputy Minister of Environment, Forestry and Fisheries)

Ms Nosipho Ngcaba (Director General: Environment, Forestry and Fisheries)

Mr Ishaam Abader (Deputy Director General: Legal, Authorisation and Compliance and Enforcement)
Ms Judy Beaumont (Deputy Director General: Oceans and Coasts)
Mr Shonisani Munzhedzi (Deputy Director General: Biodiversity and Conservation)

Dear Madam / Sir

Re: New scientific information concerning current operations of aquaculture facilities in the Saldanha Bay Aquaculture Development Zone

Introduction

On behalf of the Save Langebaan Lagoon Action Group, I bring the following to your attention and request an urgent response thereto.

Save Langebaan Lagoon (SLL) is a registered Voluntary Association, duly constituted under the

Non-Profit Organisations Act, 71 of 1997, and has a current membership of 1478 registered I&APs.

SLL was formed to educate the public regarding the impacts of the aquaculture development zone on the Langebaan Lagoon and the greater Saldanha Bay marine system, the quality of and access to its waters and the socio-economic prosperity of Langebaan.

Further, SLL's role is to represent I&APs in interactions with the developers/proponents, their agents and the Competent Authorities.

Supportive documentation attached to this letter

Annex 1: *“Saldanha Bay Sea Based Aquaculture Development Zone Baseline Benthic Survey – Final Presentation.”*

Annex 2: *“Saldanha Bay Sea Based Aquaculture Development Zone Baseline Benthic Survey Report – Final Draft.”*

Annex 3: Management Actions 2020 scientific findings – Final.

Annex 4: Environmental Authorisation 14/12/16/3/3/1/1728.

Annex 5: Environmental Management Programme (Number 499020/6).

Please note: Page numbers referenced in the footnotes of this letter align with the page numbers of the PDF files attached.

Background

The Baseline Benthic Survey was commissioned in 2020 by the Department of Environment, Forestry and Fisheries (DEFF), Branch Fisheries, the holder of an Environmental Authorisation for the Saldanha Bay Aquaculture Development Zone (ADZ), and conducted by Anchor Research and Monitoring.

The new findings of the above survey indicate that the Saldanha Bay Aquaculture Development Zone (ADZ) presents an untenable risk to the receiving environment of the Big Bay precinct of Saldanha Bay, for which no mitigations were submitted in the Basic Assessment Report, in application for environmental authorisation.

This research was conducted post the granting of the environmental authorization, Annex 4, no impact mitigations to avoid/reduce harm to the sensitive reef ecosystems were investigated, nor has a programme to contain/reduce such impact been set out in the approved Environmental Management Programme (Number 499020/6) for the ADZ, Annex 5.

Below, please find relevant extracts from the Saldanha Bay ADZ Baseline Benthic Survey Presentation (Annex 1), in support of our contention that these new findings show conclusively that the ADZ presents an immitigable risk to this marine eco-system.

Statement of Concerns

1. Results and Discussion: Presence of hard substrata/reef in Big Bay¹

- i. The marine specialist report for the Saldanha ADZ EIA considered subtidal reef habitat to be scarce in Saldanha Bay (Pulfrich 2018).²
- ii. Only identified Lynch blinder and North Bay blinder as important reef areas.³
- iii. Reports from divers during this assessment revealed the presence of calcrete rock at several sampling sites during the baseline survey (Capfish 2019).⁴
- iv. Difficulties in obtaining grab samples at several stations in Big Bay during 2020 (AR&M) sediment surveys also suggests that rock which may form reef is more widespread in Big Bay than originally suspected.⁵
- v. Observations by ARM divers deploying water quality monitoring instruments during April 2020, also indicated reef in several areas of the Big Bay ADZ precinct.⁶
- vi. Subsequent literature review revealed the existence of an extensive abrasion platform (areas of exposed calcrete rock) throughout much of Big Bay (Flemming 2015).⁷
- vii. The distribution of the abrasion platform is overlaid on a map of Big Bay and the ADZ boundaries as well as the sampling sites on the following slide.⁸
- viii. Pictures of the rock/reef type habitat found in the finfish area were taken during instrument servicing in the finfish area on the 29th of June 2020. These images were taken in extremely poor visibility but indicate the presence of basket stars (Phylum Echinodermata), sponges (Phylum Porifera) and possibly Bryozoans. Before conclusions can be drawn about the nature of the communities, specimens would need to be collected and identified.⁹

2. Presence of hard substrata/reef in Big Bay /Recommendations¹⁰

- i. Given the presence of low-lying reef detected during the baseline surveys and instrument deployments in the finfish area in Big Bay, it is recommended that a side scan sonar survey be undertaken across the whole of Big Bay to establish the actual extent of this reef and that reef biota be surveyed.¹¹
- ii. Once the extent and nature of the reef and associated benthic communities have been assessed and quantified, the management measures, mitigation measures and monitoring measures should be reassessed.¹²

¹ Annex 1 – page 17

² Annex 1 – page 17

³ Annex 1 – page 17

⁴ Annex 1 – page 17

⁵ Annex 1 – page 17

⁶ Annex 1 – page 17

⁷ Annex 1 – page 17

⁸ Annex 1 – page 17

⁹ Annex 1 – page 21

¹⁰ Annex 1 – page 24

¹¹ Annex 1 – page 24

¹² Annex 1- page 24

- iii. West Coast Rock Lobster (*Jasus Lalandi*) are evident in the video footage recorded from the Molapong dives was and were noted by AR&M divers deploying instruments.¹³
- iv. While Rock Lobster would benefit from increased organic matter originating from the aquaculture as a food source, their habitat may ultimately become smothered by fall off biofouling and culture animals.¹⁴

3. *Conclusions/ Presence of hard substrata and reef in the big bay precinct*¹⁵

- i. The presence of hard substrata and low lying reef (besides that identified at Lynch Blinder) within the Big Bay ADZ precinct has been highlighted for the first time.¹⁶
- ii. The reef appears to be low-profile that is mostly < 1 m in height, although some outcrops greater than 1 m in height are present.¹⁷
- iii. The extent and nature of the reef needs to be quantified throughout Big Bay which is frequently impacted by scouring and sand deposition.¹⁸
- iv. The nature of the macro-faunal/epifaunal assemblages associated with the reef needs to be quantified.¹⁹
- v. Once the above aspects are completed, the impacts of aquaculture in the Big Bay precinct in light of there being reef present should be re-assessed.²⁰

4. *Extract from the “Saldanha Bay ADZ Baseline Benthic Survey Report – Final Draft, (Annex 2), in support of the contention that the ADZ poses an immitigable threat to this marine eco-system.*

“The impact assessment for bivalve aquaculture did not assess the impact of placing the culture structures over hard substrata (SRK BAR 2017, appendix D2), and while the impact assessment for finfish culture does consider the presence of reef, it assumed limited distribution which was confined to Lynch Blinder (SRK BAR 2017, appendix D2). The effects of aquaculture on patches of low-lying reef with some substantial outcrops exceeding 1m in height and their associated epifaunal communities has thus not been considered in the Big Bay precinct beyond Lynch Blinder. Given the identification of reef in this precinct further studies should be conducted to address this omission. It is important to note that this is **ONLY** applicable to areas of the Big Bay precinct (not the ADZ as a whole) where reef occurs (the present day extent of reef in Big Bay is yet to be determined and a detailed bathymetry/side scan sonar survey should be undertaken).”²¹

¹³ Annex 1 – page 22

¹⁴ Annex 1 – page 22

¹⁵ Annex 1 – page 27

¹⁶ Annex 1 – page 27

¹⁷ Annex 1 – page 27

¹⁸ Annex 1 – page 27

¹⁹ Annex 1 – page 27

²⁰ Annex 1 – page 27

²¹ Annex 2 – page 40

5. *Annex 3 refers: “Preliminary way forward with regards to scientific findings to be undertaken forward by the DEFF: Fisheries Management”, published in Management Actions 2020 scientific findings, as communicated to the members of the ADZ Consultative Forum.*

In consideration of the findings identified in the Benthic Survey Presentation and Report, Save Langebaan Lagoon Action Group therefore avers that the recommendations by DEFF in Annex 3 are inadequate and/or inappropriate, in addition to lacking the necessary sense of urgency to meaningfully address these additional ecological risks to the receiving environment.²²

6. *In addition to the above, please clarify:*

- i. Why the Flemming report/side scan sonar report as mentioned in the Benthic Survey was not included in the environmental impact assessment studies conducted as part of the Final Basic Assessment Report?
- ii. Why no investigation was conducted by DEFF regarding the presence of a reef as identified by Pulfrich (2018)?

We therefore request that the concerns raised and the gaps in knowledge identified by Anchor Research and Monitoring in the Benthic Survey Presentation and Report be addressed immediately by DEFF.

Further, we request independent oversight of the steps to be taken to ameliorate such risk and that all interested and affected parties are comprehensively apprised of such action.

The Benthic Survey Presentation and Report raise numerous critically important questions regarding the impact of aquaculture on the habitats of these rocky outcrops, including the health of the rock lobster population, and the dispersion of pollutants, issues germane to assessment of the risk of ecological harm posed by the ADZ and the type and efficacy of mitigation measures.

In conclusion:

We submit that the omission of a comprehensive assessment of the sea-bed in the area of the sited ADZ in the final basic assessment report must render the Environmental Authorisation granted fatally and technically flawed. Mitigations submitted in the final BAR are incomplete or lacking and therefore should not have been relied upon by the Minister of Environmental Affairs to inform a positive authorisation.

We therefore call on DEFF to immediately suspend the current Saldanha Bay ADZ operations until these critical deficiencies of the approved Environmental Management Programme for the ADZ have been comprehensively addressed.

We respectfully request that DEFF responds with a proposed plan of action with regard to this matter by Friday 9th October 2020

²² Annex 3

Yours sincerely

Clifford Wright

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