

RENEWAL AND VARIATION OF ATMOSPHERIC EMISSION LICENCE FOR LUCKY STAR LIMITED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 2004 (ACT 39 OF 2004) –

Comments and Responses table

Number	Date	I&AP name	Comment	Response
Objections				
1	31/07/2017	Neil Drummond	<p>I would like to oppose the renewal of this licence based on the extreme impact this has on the surrounding area.</p> <p>I live in Northshore and the smell from the factory and the thick black smoke emitting from it are having a severe impact on our wellbeing. We can't go outside the house and even with all doors and windows closed the stench in the house is disgusting.</p> <p>This stops us using the many great restaurants in HB when the factory is operating and has a detrimental impact of their business.</p> <p>I have no desire to see the people who work for this company without work but they cannot be the only people's employment that is considered when making such a decision. Many restaurants have closed in HB in the last few years and I am sure guesthouses are also struggling.</p> <p>I have personally watched people get straight back in their car with a scarf over their mouth rather than visit the Harbour Market due to the stench.</p> <p>We have been promised scrubbers and filters but there is always an excuse as to why they are not working yet.</p> <p>Enough is enough. Use the space for some other meaningful employment and do the processing of pet food from fishmeal in an area where no businesses or residents nearby have to suffer.</p> <p>Thanks for your time and attention.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • It is noted that the factory releases a fishy smell. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. • Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. • The fishmeal plant also has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. <p>In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard.</p> <ul style="list-style-type: none"> • A Black smoke incident occurred on 28 July 2017. The incident was reported to City of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. • Please note that should the factory close, not all the workers would be able to get new jobs, given that jobs are scares and have certain requirement and require qualifications, etc. of which some of the workers would not be able to fulfil. • The City of Cape Town: Air Quality Management is the Competent Authority who will make the decision on whether to grant or refuse the AEL. • It is noted that you feel that your wellbeing is being affected by the emissions of the factory. Note that Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions. • Lucky Star employs 91 employees at the Hout Bay factory. A total more than R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R36 875 659 between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017. • Lucky Star acquired a specially manufactured chemical scrubber at a cost of R3,3 million. The new chemical scrubber was successfully commissioned on the 7th of July 2017 and is up and running. • Fishmeal is a nutrient-rich, high-protein supplement feed ingredient that stores well, and is used primarily as a valuable ingredient in animal and aquaculture feed, as well as premium agricultural

				<p>fertilizer. As such, fishmeal is an essential agricultural protein source. Fish oil is a by-product of the fishmeal production process and is also in high demand in the agricultural, chemical and pharmaceutical industries.</p> <ul style="list-style-type: none"> A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.
2	01/08/2017	Michael Darby	<p>I am a resident of Hout Bay Heights, and also operate a business in Hout Bay Heights. Since I moved here 2 years ago, and opened the business in January 2016, the Oceana factory has been the single biggest problem in my life.</p> <p>The smell is disgusting, and has meant that at times we have had to closer the office and work elsewhere. We are also now looking to move to another location. The tourist and job creation potential in this area is immense, and is much needed by the people of this community – but proposed developments like the Hout Bay Tourist and Information Centre will never be able to succeed and employ people as long as this awful smell persists.</p> <p>To really create a tourist opportunity and hundreds of job opportunities, please DO NOT renew their licence. Aside from damaging our economy and the potential for growth, we also live with health issues that we know are sufficient for the city to have blocked a proposed new housing development. I am occasionally wakened in the middle of the night due to the smell if I inadvertently leave windows open.</p> <p>It is unconscionable to have a factory emitting both unpleasant and possibly dangerous chemicals in the middle of a residential area like Hout Bay, for the sake of less than 100 jobs. It is disgusting that the City completely ignores like the rights and living conditions of residents in particularly <u>Hangberg</u> and Hout Bay Heights, as I know it has been petitioned numerous occasions with no change. The company operating the factory is a large and cash-rich company who can easily afford to move elsewhere. We cannot.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. Please note that the Factory has been operating in Hout Bay since 1958. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. Lucky Star employs 91 employees at the Hout Bay factory. A total more than R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R36 875 659 between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017. Please note that should the factory close, not all the workers would be able to get a new job, given that jobs are scares and have certain requirement and require qualifications, etc. of which a lot of the workers won't be able to fulfil. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay of which Hangberg was one. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and would have insignificant to no health risks. Comments on the City of Cape Town cannot be responded to as it must be taken up with the City itself.
3	01/08/2017	Janine Bywater	<p>I am writing to voice my concern that Oceana has requested a renewal of their licence to operate. As a Hout Bay resident I have experienced first-hand the toxic effects of the factory's operating and on numerous occasions have actually left</p>	<ul style="list-style-type: none"> Noted, thank you for your comment.

			<p>Hout Bay for the day as I have been unable to function due to the extremely unpleasant side effects of the noxious fumes that emanate from the factory. The smell is not only unpleasant but has at times caused physical illness – headaches and vomiting. In addition I have now purchased a property in Hout Bay but am concerned that the smell will drive visitors away from the bay and result in a decrease in our property value.</p> <p>The smell has resulted in loss of revenue for the restaurants in the valley and we have witnessed day trippers turn their cars around in the harbour area car parks when they experience the fumes. I can only imagine what this has done to the traders in the area.</p> <p>Please carefully consider renewing the license – for the sake of the Hout Bay population at large, and not just a minority who work for a company that has no regard for the health of the public or for the pollution that they are creating.</p>	<ul style="list-style-type: none"> • Please note that the unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. <p>Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.</p> <ul style="list-style-type: none"> • A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and would have insignificant to no health risks. • Lucky Star employs 91 employees at the Hout Bay factory. A total more than R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R36 875 659 between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017.
4	01/08/2017	Jeane McBride	<p>Welcome to the Fresh Air for Hout Bay (FAHB) Odour Pollution Impact Surveys. We are trying to determine the impact the odour pollution from Oceana's fishmeal factory has on our community. There are 4 sections to this survey - 1) general details, 2) health impact, 3) well-being impact, and 4) business impact. Please fill in as much information as possible, being truthful at all times. If a particular section is not relevant to you, simply click next at the bottom of the page and continue. Thank you for your help as we try to make a positive contribution to the sustainable growth of our community.</p> <p>1. Please note that the questions in this survey have been developed for research purposes and in preparation for the public participation process of Oceana's Atmospheric Emissions License. No personal details will be shared, only a summary of the collective results. By checking this box, you give your consent for your information to be included in this research and for it to be shared with the relevant authorities.</p> <ul style="list-style-type: none"> • <input type="checkbox"/> I declare that the information provided in this survey is true and correct as far as I understand, and I give my consent to Fresh Air for Hout Bay to use this information as part of their research and on-going discussions with relevant authorities <p>2. Contact Information and Personal Details: Name: Address: Phone number: E-mail:</p> <p>3. What is your relationship to Hout Bay</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Property owner • <input type="checkbox"/> Resident (tenant) • <input type="checkbox"/> Long-time visitor • <input type="checkbox"/> Tourist • <input type="checkbox"/> Other (please specify) <p>4. If you are a property owner or resident, please select the general area in Hout Bay where you live:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Harbour - Hangberg - Heights • <input type="checkbox"/> Northshore - Beach Estate - Kronenzicht - Helgarda • <input type="checkbox"/> Hanging Meadow - Hillcrest - Baviaanskloof - Scott Estate - Berg en Dal - Penzance • <input type="checkbox"/> Imizamo Yethu - Hughenden - Meadows - Oakhurst • <input type="checkbox"/> Suikerbossie - Ruyteplaats - Mount Rhodes • <input type="checkbox"/> Kenrock - Tarragona - Longkloof 	<p>8. Please note that the unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.</p> <p>Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.</p> <p>Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. Formalin concentrations as such should not pose a health risk in Hout Bay." Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study.</p> <p>10. Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials.</p> <p>The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs.</p> <p>In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard.</p>

			<ul style="list-style-type: none"> <input type="checkbox"/> Other (please specify) <p>5. Are you registered on the Fresh Air for Hout Bay website?</p> <ul style="list-style-type: none"> <input type="checkbox"/> No <input type="checkbox"/> Yes <p>6. Do you think the odour from Oceana's fishmeal factory is a problem in Hout Bay?</p> <ul style="list-style-type: none"> <input type="checkbox"/> No <input type="checkbox"/> Yes <p>7. How many people in your family or household are impacted by the odour? two</p> <p>8. Please describe the odour: <u>chemically nauseating</u></p> <p>9. How often do you experience the odour? Whenever the fish factory is working and the smoke is pouring out the stacks and wind is blowing south!</p> <p>10. How would you describe the intensity of the odour? Nauseating!!</p> <p>11. Do you think the odour compromises your Constitutional right to live in an environment that is not harmful to your health and well-being?</p> <ul style="list-style-type: none"> <input type="checkbox"/> No <input type="checkbox"/> Yes 	<ul style="list-style-type: none"> A Black smoke incident occurred on 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. Lucky Star acquired a specially manufactured chemical scrubber at a cost of R3,3 million. The new chemical scrubber was successfully commissioned on the 7th of July 2017 and is up and running. A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.
5	01/08/2017	Hout Bay Residents and Ratepayers Association – Len Swimmer	<p>With reference to your advertisement in The Sentinel News Friday July 28th 2017, regarding the Lucky Star fish factory's application for the renewal & variation of its Atmospheric Emission licence, we hereby inform you as follows:</p> <ul style="list-style-type: none"> Formalin is a saturated solution of formaldehyde gas in water. It contains about 40% (by volume) or 37% (by weight) formaldehyde gas along with a small amount of stabilizer. If there is insufficient stabiliser, formaldehyde gas, which is highly toxic, is given off. The <u>purpose of introducing formalin</u> into the production process is to increase the shelf life of the fish. A review of Google articles on the topic show that there have been numerous cases of excessive formalin being found in fish products, particularly from Far East sources, which is potentially dangerous for human consumption. This Association is particularly concerned in the quality of the emissions from the Lucky Star fish factory. It now seems that the introduction of formalin will result in making the emissions potentially even more toxic than they are already. We thus have no alternative but to object strongly to Lucky Star fish factory's application for the renewal & variation of its Atmospheric Emission licence with this toxic mix being introduced. 	<ul style="list-style-type: none"> Thank you for your comment. Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. Fishmeal is a nutrient-rich, high-protein supplement feed ingredient that stores well, and is used primarily as a valuable ingredient in animal and aquaculture feed, as well as premium agricultural fertilizer. As such, fishmeal is an essential agricultural protein source. Fish oil is a by-product of the fishmeal production process and is also in high demand in the agricultural, chemical and pharmaceutical industries. A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various

				<p>communities in close proximity and further away from the Hout Bay plant were well below the guidelines.</p> <p>In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1×10^{-6} and 0.4×10^{-6}. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.</p> <p>As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.</p>
6	01/08/2017	Gary Miller	<p>I wish to place my objection to the license renewal application for Oceana's Atmospheric Emissions License. I have lived in Hout Bay for over 4 years now and over this period the stench that emits from the factory has become progressively worse to the point where we sometimes cannot entertain guests in our gardens due to the putrid stench. It is beyond me how a company is allowed to pollute an entire suburb with little or no apparent concern for the wellbeing of its neighbourhood's air quality of water quality. I have seen the discharge from the factory into the harbour and am horrified by what I see.</p> <p>I would not get away with this if I ran a business and therefore I do not see how Oceana continue to be allowed to do so. They should be subject to substantial testing and infrastructure investment to provide a state of the art facility should they wish to continue, instead the smoke and chemical residue leaks straight through the roof of their facility into the air that I and my neighbours have to breath.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. <p>Note that internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.</p> <ul style="list-style-type: none"> Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. The factory does not pump any effluent into the harbour. All effluent lines are connected to the main municipal line and, as per the standard operating procedure for the factory, water is only sent to the pump station upon confirmation of full pump functionality from the Water Treatment Operators. Please note that the fishmeal process does not produce any production process effluent as all liquids are evaporated in the Waste Heat Evaporator. There is therefore no waste stream from the process. That being said, the plant does generate wash water which is created during clean-up processes of the plant and plant equipment. On 4 May 2016 - there was a processing liquid spill into the harbour, from our production facility in Hout Bay. The factory's emergency response team, who have been trained for this type of event, reacted immediately by encircling the spill with a 40 meter floating oil absorbent boom and treating the deposit with oil absorbent powder. Emergency response procedures were immediately initiated and work was completed within two hours of the incident occurrence. The incident was also escalated to the relevant authorities at both local municipal and provincial level. Post investigation regarding the incident we can confirm that an estimated 10 liters of processing liquid which contained a water and fish oil mixture, overflowed into the harbour due to the malfunction of the oil processing equipment. This resulted in the storage tank overflowing and liquid carryover into the air ducting system which was then channelled into the sea water scrubbing system. Corrective action has been implemented at the factory, with all tanks now being modified in order to prevent carryover into the air ducting system, and thereby prevent any possibility of further spills. Inspections of the harbour area post clean up showed no residual liquid in the bay. It is important to note that the spill was as a result of an irregular and upset processing condition at the factory and that corrective action has been taken so as to verify no repetition of the incident. The following infrastructure investments have been made over the past years, just to name a few: 2017 - a specially manufactured chemical scrubber was installed.

				<p>2016 - The Waste Heat Evaporators were fully automated and a high capacity decanter was installed.</p> <p>2015 - New oil-water separators were installed to improve the quality of the product and both Steam Driers were refurbished.</p> <p>2013-2014 - Two new jet fired burners were installed.</p> <ul style="list-style-type: none"> On Friday 03 March 2017 and Sunday 05 March 2017 the plant experienced a breakdown on an extractor fan that led vapour from the steam driers escaping the fishmeal plant into the atmosphere. Although production stopped during both incidents the vapour emission continued for approximately 25 to 30 minutes before it could clear. The extraction fan motor was replaced with a new motor. Both these incidents were communicated to with the local authorities and corrective actions were put in place. Lucky Star Hout Bay acquired a specially manufactured chemical scrubber at a cost of R3, 3 million. The new chemical scrubber was successfully commissioned on the 7th of July 2017 and is up and running.
7	02/08/2017	Jeremy Flowerday	<p>To whom it may concern,</p> <p>With reference to the above subject I wish to add my objections to the application process and state the following. I have been a resident in Hout Bay from 2006, I moved here to take up the General Managers position at the 12 Apostles Hotel and Spa. I was there from 2006 until 2009 where after I moved onto other positions in the hospitality industry both locally and overseas.</p> <p>I can recall on numerous occasions guests at the 12A asking me why there was a strange smell in Hout Bay, they had either been to lunch or an afternoon, evening drink or even a stroll on the beach, and without doubt all found the odour off putting and a deterrent to go back to Hout Bay again. I recall thinking that I am so glad our hotel is far away so that we are not affected by this odour but also spared a thought for all the hospitality businesses that were. Imagine all the complaints not to mention the decline in occupancies !</p> <p>It seems almost incredulous to me and to others that this activity is allowed in an area that is both a residential and commercial zone, it appears we are trying to send people away and destroy what essentially is Hout Bay. The essential Hout Bay of course has varying meanings to different people, an employer, yes without doubt, adds to the economic prosperity of the area, yes it does. But I ask at what long term cost to Hout Bay?</p> <p>Remove the restaurants, hotels, guest houses, a decent beach, the national park, we will then simply be a place to drive through on the way to Chapmans peak and beyond. No seal island trips, no coaches at the harbour having a stroll and purchasing a curio or two, no luncheons and dinners, poor atmospheric appearance and feel, once it starts it will never end. The world is a smaller place today and tomorrows visitor is very well and reliably informed of places to go and others to avoid either by safety concerns, not keeping within their lifestyle choice as well as the environment not being cared for.</p> <p>The process whereby Oceana can continue this ghastly, foul fish meal production process musts simply stop. It seems unbelievable that such a business exists in Hout Bay? It's always been here they say! Yes, I know but I don't recall the levels that are currently reached and the totally foul and obnoxious odours that all people in Hout Bay have to endure. Not to mention the people that visit here but don't live here. NIMBY or not in my back yard is a much-used term to avoid actions which have a measure of sense but are not nice for me, but it's a very real threat to welfare, health, business, expansion and ultimately welfare and an inheritance for our children for the future. Where will it stop????</p> <p>Oceana is a strong wealthy company currently trading at 9400 cents and a distribution to employees of R292 million or 11% of share ownership. All big picture stuff. However, it has the resources to re-locate or convert this process elsewhere where the impact to people will hopefully be nullified.</p> <p>From their web site below:</p> <p>We recognise the importance of engaging regularly with our key stakeholders, to understand and respond appropriately to their specific interests. We place a particular priority on those stakeholders who have a material influence on our activities, namely our employees and unions, government and regulators, investors, customers and suppliers, and the communities in which we operate. Following the changes in leadership within the Department of Agriculture, Forestry and Fisheries after the recent election, we have placed particular emphasis on developing constructive relationships with the</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions. Note that the wind direction plays a role in distribution of the smell. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10-6 and 0.4 x10-6. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required. Lucky Star acquired a specially manufactured chemical scrubber at a cost of R3, 3 million. The new chemical scrubber was successfully commissioned on the 7th of July 2017 and is up and running. The scrubbers are there to reduce the fishy smell.

			<p>new leaders. At a community level, we have continued building on the consolidation of our corporate social investment activities, through the work of the Oceana Foundation.</p> <p>The last part regarding the communities in which we operate brings us back to the very real problem facing the people and business of Hout Bay and is simply a "statement and a particular priority" on the part of Oceana which I believe is simply ignored and not taken into all due consideration.</p> <p>In closing for the sake of Hout Bay, its sustainability, its uniqueness, its quintessential charm and history we have to ensure this process is discontinued so that my daughter's children can enjoy an environment that is healthy and enjoyable. For all mankind, this surely is not much to ask.</p> <p>Jeremy Flowerday</p> <p>NB. Perhaps we should offer an AIR B&B offering to the Oceana Executives at the foreshore on the days the stink erupts???</p>	
8	02/08/2017	Lisa Walker-Brook	<p>I am writing to express my opinion (as a taxpayer) regarding the application for an Atmospheric Emissions License by the Oceana Fishmeal Factory. Our community is being poisoned by the emissions coming from this factory. The smell is nauseating and the smell impacts on our ability to live comfortably in our own homes. When the factory is pumping out these toxins we cannot even sit outside in our gardens, much less go out for dinner in the village as it makes you feel ill to breathe it. This smell is impacting upon businesses and the tourism industry in Hout Bay. Many of our residents rely upon this income for survival. Hout Bay pays some of the highest rates in the Western Cape for the privilege of enduring this smell.</p> <p>Many people are suffering various health issues which I am sure are linked to these toxins.</p> <p>As you know over the past eight months, housing development in Hangberg was halted due to health concerns from Oceana's emissions and yet the City of Cape Town has actively denied FAHB and the community access to the Health Risk Assessment conducted. The residents of Hout Bay deserve visibility of this report in the interests of transparency.</p> <p>Now that Oceana plan to reintroduce the use of formalin (formaldehyde) as a raw material in the process the risks to residents are even higher. I am allergic to formaldehyde and this will mean I cannot go outside at all and may even have to move out of Hout Bay.</p> <p>I hope that you reconsider issuing a license for Oceana to continue poisoning the community.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • Please note that the unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. • The statement made regarding the City of Cape Town denying access to the Health Risk Assessment could be due to another process such as an appeal being in process. Therefore, information would not be able to be accessed until that process has concluded. This should however be taken up by the competent authority. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. • A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and insignificant to no health risks. • A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines.

				<p>In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.</p> <p>As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.</p>
9	02/08/2017	Line Ryan-Du Preez	<p>As a resident of Hout Bay, I am so saddened by the news that the Fish factory is going to continue to operate, making people sick, getting headaches and so many other ailments, that when they leave, they get better. (I live close by and have also suffered at 3am in the morning vomiting, experiencing horrible effects with the stench, which I have reported in detail before).</p> <p>I am now informed that they are going to add more chemicals that will pollute the air. The school and residents are also in great danger and it is just such a scandal affecting all the businesses, out tourist trade and the basic health which is a right that we all have! The inhalation of formaldehyde gas in itself, in even small quantities is followed by bronchitis and pneumonia. Pneumonia is due to the inhalation of the gas and not to secondary infection.</p> <p>Please do not allow this !</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. • Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions. • A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and insignificant to no health risks. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. • The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. • Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. • The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. • A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. • In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.

				<p>As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.</p> <ul style="list-style-type: none"> Lucky Star employs 91 employees at the Hout Bay factory. A total of R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R19, 292 million between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017.
10	03/08/2017	Deborah Saint	<p>I am writing to oppose the renewal of Oceana's licence in Hout Bay.</p> <p>As I am sure you are aware - the smell from this factory is nauseating. I live a mile away and the stench actually wakes me up at night and I want to vomit. I have friends who have visited and stayed Hout Bay each year who just will not come again due to the smell. Tourism is affected to this degree. It's impossible to take visitors to lunch at The Look Out, or even at Dunes across the bay because of the smell.</p> <p>Hout Bay's restaurants, B&B's, hotels and the popular Market, are all affected by Oceana's stench and Hout Bay will suffer if this stench continues to be allowed to pollute our air which is detrimental to our health.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Lucky Star employs 91 employees at the Hout Bay factory. A total of R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R19, 292 million between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study.
11	05/08/2017	Katy Lambert	<p>I am writing with reference to the Hout Bay fish factory license renewal ref WCCT059.</p> <p>I do not want the license renewed because the fish factory's emissions negativity impact my family and a large amount of the community. We are unable to open our windows and the chemicals in the air give us head aches so bad we wake up in our sleep when they start. My mother had to start using an inhaler when she visits and the wind blows the emissions our way.</p> <p>The additional request to use formaldehyde is very concerning.</p> <p>I am hopeful that the harbour area could be renovated once the factory is removed and more jobs than what the present factory employees could be create. Plus the employees would not be exposed to the harmful effects of the emissions.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions. Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds.

				<ul style="list-style-type: none"> Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. Lucky Star employs 91 employees at the Hout Bay factory. A total of R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R19, 292 million between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017.
12	06/08/2017	Johan Wilke	<p>Ref: Wcct059</p> <p>I would like to object to renewal if license to Oceana on the grounds that it pollutes the air and deters tourists from having a meal at various restaurants in the area.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. <p>In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard.</p> <ul style="list-style-type: none"> A black smoke incident occurred on 28 July 2017. The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day.
13	07/08/2017	Lynne Marshall	<p>As a long-time resident of Hout Bay I most strongly object to the above application.</p> <p>The stench from Oceana when there are operating normally is already untenable, so many residents complain of headaches, nausea, red itchy eyes and respiratory problems when the factory is in operation (many children seem to be the worst affected). When in production various areas in Hout Bay are unbearable, these vary dependent on wind direction but in summer when it is hot this results in having to live inside a closed box – the alternative is to feel permanently sick from the odours.</p> <p>We have had friends who have come to Hout Bay to meet us for a lunch and they have left again as the thought of eating in the presence of these odours is just not an option – this in turn links to the viability of Hout Bay as a tourist attraction, which in turn has huge potential in the upliftment of the underprivileged in Hout Bay. There are also many self-employed people living here and the ability to work efficiently under these conditions is severely hampered</p> <p>Now Oceana wish to start adding formalin into the mix which will also spew out into the bay and which is totally unacceptable, (this usage was stopped some time ago I believe)</p> <p>Please see report below on the use of formalin :</p> <p>Potential Acute Health Effects: Very hazardous in case of eye contact (irritant), of ingestion, Hazardous in case of skin contact (irritant, sensitizer, permeator), of eye contact (corrosive). Slightly hazardous in case of skin contact (corrosive). Severe over-exposure can result in death. Inflammation of the eye is characterized by redness, watering, and itching. Potential Chronic Health Effects: Hazardous in case of skin contact (sensitizer).</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. <p>Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.</p> <ul style="list-style-type: none"> Lucky Star employs 91 employees at the Hout Bay factory. A total of R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R19, 292 million between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017.

			<p>CARCINOGENIC EFFECTS: Classified A2 (Suspected for human.) by ACGIH, 2A (Probable for human.) by IARC [Formaldehyde]. MUTAGENIC EFFECTS: Mutagenic for mammalian somatic cells. [Formaldehyde]. Mutagenic for bacteria and/or yeast. [Formaldehyde]. Mutagenic for mammalian somatic cells. [Methyl p. 2 alcohol]. Mutagenic for bacteria and/or yeast. [Methyl alcohol]. TERATOGENIC EFFECTS: Classified POSSIBLE for human [Methyl alcohol]. DEVELOPMENTAL TOXICITY: Not available The substance may be toxic to kidneys, liver, skin, central nervous system (CNS). Repeated or prolonged exposure to the substance can produce target organs damage. Repeated exposure to a highly toxic material may produce general deterioration of health by an accumulation in one or many human organs.</p> <p>All of the above must surely give the City of Cape Town a justifiable reason for not granting the emissions licence? I can be contacted for further comment on 083 2736297 or via email – lynem@cinemark.co.za</p>	<ul style="list-style-type: none"> Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that “Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>” Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. The extraction taken from the S.A Chemical Products Material Safety Data Sheet is noted. Also note that the aforementioned document states that Formalin is 100% soluble in water and therefore all emission generated from formalin will be treated with the seawater scrubber and chemical scrubber. The abovementioned document also provides exposure controls/personal protection information. A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required. Further note that no formalin will not be released into the bay.
14	07/08/2017	Linda Fedder	<p>Hout Bay Harbour has been deteriorating badly over the last 5 years. Sunken vessels are lying in the water, factories are operating from the harbour, processing fishmeal, spewing toxic fumes into the air. The City of Cape Town has blocked the development of an affordable housing complex in Hangberg due to health concerns for the residents. That being the case, how is it possible that the City would even consider allowing Oceana to extend their operating license? They want to reintroduce the use of formalin (formaldehyde) as a raw material in the process. What about the people who work there? How can it be allowed that they are exposed to those toxic conditions? What about all the rate paying residents, who have to breathe in this filth? Businesses in Hout Bay are losing clients, who cancel their bookings, or walk out of restaurants, gagging due to the stench in the air. People are suffering chronic sinusitis, chest infections and respiratory ailments due to these emissions. Fresh Air Hout Bay have provided information attesting to this on numerous occasions.</p> <p>Hout Bay harbour could be developed into a world class waterfront, creating hundreds of jobs, boosting the tourist sector and promoting wellbeing in the community. Why would the City allow this activity to continue polluting our beautiful bay? 100 seasonal jobs?</p> <p>Think of the long term benefits to the community if we had a waterfront in Hout Bay, think of the negative impact on the environment, community and economy if Oceana continues to operate.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. Please note that Lucky Star Hout Bay has no relation to the sunken vessels. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.

Please don't renew Oceana's operating license

- Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase.

Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds.
- Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults.
The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. Formalin concentrations as such should not pose a health risk in Hout Bay." Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study.
- A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines.
In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.
As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.
- Lucky Star employs 91 employees at the Hout Bay factory. A total of R60 million has been paid out in salaries and wages between 2011 and 2017. Training and developed spend on the employees is in excess of R1 763 152 for the period 2011 to 2017. The facility paid rent, rates, taxes, and municipal bills to the value of R19, 292 million between 2011 and 2017. Oceana Foundation has invested R4 793 370 in the schools, early child development and Fire Disaster relief fund between 2011 and 2017.
- The Section 189 process, which was facilitated by the Commission for Conciliation, Mediation and Arbitration (CCMA), followed Oceana's announcement on August 14 2015 that the Company was giving serious consideration to the closure of its operations at the Hout Bay Fishmeal Factory, and proposed relocation of production capacity and all staff to their St Helena Bay operations or, where applicable, other subsidiaries in and around Cape Town.

It must be noted that the Hout Bay Staff were given the option to relocate to St Helena Bay on the same terms and conditions but this was not an option favoured by the staff or the wider Hout Bay community. Alternative options were therefore reviewed and debated during the consultation process to find economically viable and long term sustainable solution.

After tabling the proposed closure in August, Oceana was overwhelmed with community support calling for their continued presence in Hout Bay. In addition to this support, Oceana received a 1,200-strong petition on September 20 from the Hout Bay Civic Association, firmly rejecting the proposed closure on the grounds of the negative effect it would have had on the communities who rely on the fishing industry for their livelihood, and the levels of social investment contributed to neighbouring communities by the company.

15	07/08/2017	Shan Silberbauer	<p>I live in the residential Northshore area of Hout Bay, and as a home owner in the area, I am extremely concerned about the activities of the Oceana factory.</p> <p>The Oceana smell emissions have in the past been so disturbingly bad that my family has left the bay for the day to decrease the nausea levels in our family. In my area the emissions have mostly been extremely bad in the evenings and at night, and have woken my children and I up on many occasions. Interestingly over the past few months (ahead of this application) there has been few days where it has been terrible. Frequently between December and March of this year we had to cancel a garden family braais as it was just too unpleasant to eat outdoors, despite the wonderful weather. We have stopped inviting friends over all together, incase Oceana ruins our plans. This is unacceptable.</p> <p>I really feel that the actions of the factory are adversely affecting Northshore residence quality of life. It is negatively affecting my children's health and decreasing the value of our property. I strongly request that the factories compliance to emission limits be carefully analyzed before they are allowed to continue functioning. The building needs to securely sealed and industrial emission scrubbers should be compulsory at all times – <u>including</u> at night – when there seem to feel they aren't being monitored as closely and people can't take pictures of the pollution they are pumping into the environment.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions. • Note that there were no production days from November 2016 up to 19 January 2017. Production started on 20 January 2017 and was a total of 7 days in January, 11 days in February and 16 days in March 2017. As such no emissions or odours were emitted from the factory. • Lucky Star Hout Bay acquired a specially manufactured chemical scrubber at a cost of R3.3 million. The new chemical scrubber was successfully commissioned on the 7th of July 2017 and is up and running. • Please note that in 2014, the Department of Environmental Affairs and Development Planning (DEA:DP) installed an air monitoring station adjacent to the factory, which analyses and measures emissions on a 24-hour basis. Further note that emissions sampling is done and final analysis results are submitted to the licensing authority periodically as per the terms of the plant's Atmospheric Emission License. As such, emissions are being analysed and provided to the licensing authority. • The emissions are being scrubbed continuously during day and night shift. The current licence requires the scrubbing system to be operational day and night and hence the factory adheres to the requirement.
16	08/08/2017	Richenda Slingerland	<p>I am a resident living in close proximity to Oceana fish factory and feel my health and well-being severely affected due to their highly offensive and harmful emissions.</p> <p>I suffer from headaches and constant nausea due to the foul smell regularly permeating my home. This impacts my work, which I do from home. My clients are affected and reluctantly present themselves and often cancel due to the inhumane smell. My work performance is diminished due to an inability to stay focused caused by the taxation to my health and well-being.</p> <p>The smell restricts my social interactions which has a direct impact on my wellbeing. Friends and family cannot put up with the olfactory assault and stay away.</p> <p>It is beyond me that one company can be allowed to operate at the detriment and expense of an entire community and the multitude of visitors that constantly stream in.</p> <p>Please I implore you, do not renew Ocean's license.</p> <p>While I write this, the smell is causing terrible waves of nausea which is bringing me to tear.</p> <p>Please act now and save us from this horrible affliction.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the

				<p>factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.</p> <ul style="list-style-type: none"> Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.
17	08/08/2017	Hannah Currier	<p>I am writing as a Hout Bay resident and health coach working in Hout Bay.</p> <p>I would like to oppose the Oceana Emissions License Renewal happening in a few months' time.</p> <p>Myself and my family all suffer from headaches and I have developed asthma as a result of the chemical odours emitting from the factory in the harbour.</p> <p>Oceana needs to operate in a suitable location away from residential areas. I have seen first-hand what SO2 inhalation can do to a person who has sulphur sensitivity.</p> <p>Please record my strong opposition to the license renewal.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions. A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and insignificant to no health risks.
18	09/08/2017	Janet Becker	<p>I am not in agree with the licence being renewed for Oceania Fish factory in Houtbay.</p> <p>For approximately 4 to 5 months of the year, especially the summer months when we need to have the fresh air in our homes, we find we are having to batten down the hatches and burn candles, put our extractor fans on to try and rid our homes of the awful stench. We are tired of being woken in the middle of the night with the most hideous smells.</p> <p>We are so fed up of inviting friends to our home and our lovely local outdoor restaurants and trying to enjoy a lovely meal and bring bombarded by the atrocious smell.</p> <p>If this continues it will impact on so many businesses here in Houtbay, restaurants, shops and hotels and guest houses, which will result in more people losing their jobs, many more than are currently employed at Oceania here in Houtbay.</p> <p>I don't want to spend my summer months continuously feeling nauseated and tired from lack of sleep.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The factory operates 24/7 and processes fish whenever available, meaning during the day and night. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.
19	10/08/2017	Eckhard Becker	<p>To who it may concern :</p> <p>The renewal of the license for Oceana to continue with the processing plant in its current condition should not be granted.</p> <p>I am an affected resident of Houtbay who lives in 5 minute driving vicinity of the plant and I suffer from the stench that is blown by the wind in the direction of my home.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.

			<ul style="list-style-type: none"> The air pollution is so severe that I suffer from nausea, burning eyes and headaches as a result of the emissions. There is no way to protect myself from the effects as the emissions as they occur at unpredictably times, very often during sleeping hours where I am awakened by the sickening stench. <p>By that time it is too late to close windows in order to keep the smell out of the house.</p> <ul style="list-style-type: none"> Over the past years the only hope for an improvement in the situation have been the regular “promises” to investigate and attempts to improve the process and machinery. All these publicized measures were noncommittal as to a possible successful remedy , never implemented on a timescale that was envisaged and have come to no change or improvement to the situation. The argument of work places being lost in the community is unbalanced as <ul style="list-style-type: none"> a) the existing workers could be retrained to engage in alternative employment in the burgeoning tourist industry of Houtbay b) The effect of the stench in the town has caused many visitors to prematurely leave their places of stay in Houtbay thereby impacting workplaces that depend on and are connected to the restauration and accommodation establishments of the town. <p>With this input I respectfully oppose the application for a renewal of the license to the operators of the stench factory!</p>	<p>Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization’s recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.</p> <p>Lucky Star acquired a specially manufactured chemical scrubber. The new chemical scrubber was successfully commissioned on the 7th of July 2017 and is up and running.</p> <ul style="list-style-type: none"> There is no guarantee that the workers would be able to obtain new jobs, should the factory close.
20	14/08/2017	Rosanna Turner	<p>I hereby confirm my disagreement to the renewal to the use of formalin in the animal processing matter. Each and every time the Lucky Star factory is processing the stench makes me feel ill the whole day. I am unable to eat it is so bad. We do not need this in our valley as the wind disperses the stench all over, even as far as Llandudno.</p> <p>With reference to the newspaper ad in the Sentinel newspaper of Friday 28 July 2017, I hereby in my personal capacity would like to express that I am totally against this licence being renewed. Each and every time they process the animal matter at Lucky Star (Lot 14, Lucky Star Hout Bay Fishmeal Factory); I get a headache and feel nauseous the whole day. I have never suffered from headaches previously. I am also unable to eat as I feel like vomiting. This cannot be healthy for humans or animals to breathe in.</p> <p>Can you please contact me by email: rosanna.turner@btinternet.com</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory’s odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. <p>Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization’s recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.</p>
21	17/08/2017	Bernadette Dutton	<p>I am writing to say that i m against Oceana having their licence renewed.</p> <p>Since i moved to Hout Bay 3 years ago, i have terrible flares up from my autoimmune illness when the factory is on. It is extremely worrying they want to add another gas that is poisonous too.</p> <p>Please do not renew the licence, some people are baby affected by the gases emitted.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. <p>The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase.</p> <p>Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds.</p> <ul style="list-style-type: none"> Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. <p>The conclusion was that “Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>”</p> <p>Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study.</p> <ul style="list-style-type: none"> A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines.

				<p>In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.</p> <p>As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.</p>
22	17/08/2017	Sandra Hayes	<p>Please note that I am not happy about the reissue of the license for Lucky Star fish meal production in Hout Bay. We have to put up with the foul odours the factory produce which can at times make us feel nausea and our eyes sore. We run a guest house and feel it has a negative impact on our guests who are horrified that this is allowed. We feel tourism creates lots of jobs in Hout Bay and guests are put off by the smell.</p> <p>We know this is a fishing village but fishing doesn't produce smell. This Fish meal factory does though.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.
23	17/08/2017	Cherelle Leong	<p>I hereby wish to register my objection to the renewal of Oceana's emissions license, in particular relating to their use of Formalin (Formaldehyde) in their production process for the following reasons:</p> <p>Extensive scientific studies have been undertaken regarding the toxic effect of emissions containing formaldehyde for humans. Studies have proven that even in small quantities the vapours are carcinogenic and increase the risk of people contracting various forms of cancer.</p> <p>Workers at the factory would be at high risk, as well as the residents that live nearby. In addition, due to the prevailing summer south easterly winds, these emissions are most likely to be spread over the entire Hout Bay valley impacting all residents adversely.</p> <p>At greatest risk would be babies and small children as well as the elderly whose immune systems are not as strong. There are a number of schools in the valley as well as old age homes. I have a 4 month old baby and fear for the safety of his health if the emissions license is granted. We live less than 2km away from the Oceana factory.</p> <p>Attached are links to the studies referenced as evidence of the adverse effects of formaldehyde.</p> <p>https://www.ncbi.nlm.nih.gov/books/NBK217652/ https://www.ncbi.nlm.nih.gov/pubmed/19957118 http://www.tandfonline.com/doi/abs/10.1080/00039896.1982.10667579 http://journals.lww.com/joem/Abstract/1983/12000/Health_Effects_of_Low_Level_Exposure_to.13.aspx</p> <p>It is also cited as a cancer risk by both the Cancer Association and the United States Department of Labour</p> <p>https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10078 https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/formaldehyde/formaldehyde-fact-sheet</p> <p>Please take this evidence into consideration. We cannot have an organization that operates for profit putting the entire community at risk. Please do not allow Oceana an emissions license that allows them to use formalin or formaldehyde.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. <p>The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs.</p> <p>In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard.</p> <ul style="list-style-type: none"> • A black smoke incident occurred on 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults.

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24	17/08/2017	Gavin Liggett	<p>I oppose the renewal of this license as the pollution that this factory emits affects my health and keeps me awake at night and a prisoner in my house during the days when the factory is operating. The emissions make my eyes burn and even wake us up in the middle of the night. We can often not sit outside or have visitors over because of the nauseating smell. It affects the value of properties in my area as well.</p> <p>This is unacceptable. The factory gets away with this because there are no repercussions as the City adopts a soft approach and does not enforce the relevant bylaws at their disposal to prevent this happening. When the smell us at its worst a drive down to the harbour will show that there are fumes emanating from every opening in the factory building as well as plumes of black smoke from the chimneys. This is clearly in contravention of their license but they have never been fined or called to account. Residents are fobbed off with the same excuses over and over again year after year.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. • The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. <p>Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds.</p> <ul style="list-style-type: none"> • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that “Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>” Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory’s odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization’s recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.

				<ul style="list-style-type: none"> Please note that comments on the City of Cape Town cannot be responded to.
25	17/08/2017	Emma King	<p>Please find below my feedback to the call for input into the submission by Lucky Star (Oceana) to renew and extend their Atmospheric Emission Licence (AEL) for their fishmeal processing operations in Hout Bay (ref: WCCT059).</p> <p>I am a home owner and resident in Hout Bay, feeding back on behalf of my family, and strongly object to their licence being renewed, for the following reasons:</p> <ul style="list-style-type: none"> Long term and ongoing public nuisance impacting the wellbeing of residents in Hout Bay: For years, since the factory has been in operation, the Oceana Fishmeal Factory has had an incredibly negative impact on the residents of and visitors to Hout Bay. This has been well documented by the hundreds of news articles documenting the issue of the offensive odour pollution and thousands of complaints on social media and other public platforms. When the factory is in production, the offensive and overbearing odour pollution permeates every element of people's livelihoods – it is impossible to sleep, have guests round or even live in your own home. It is more than just an unpleasant and irritating smell – it is pollution at an industrial level that severely impacts the wellbeing of people in Hout Bay. Lack of understanding of health implications: For years residents have raised concerns about the health implications of the emissions from the Oceana factory, particularly on vulnerable groups, such as the nearby primary schools. The City and the factory have always said that the emissions pose no health risks to local residents. However, there are untold examples (expressed on social media and other platforms) where residents have reported symptoms associated with exposure to pollutants emitted by the Oceana factory (including hydrogen sulphide) such as respiratory problems, burning eyes, coughing irritated thoughts and more. I myself have suffered from these symptoms, as has my husband – and these symptoms are only present when we are in Hout Bay and when the factory is in production. Anecdotal feedback from GPs in the area confirm that there are noticeably higher numbers of reported respiratory issues than in other areas. The City and Oceana claim that there is no way that these can irrefutably be connected to the factory's production, but likewise I would argue that there is no way that they cannot. Impact of local businesses and development: When the factory is in production, it has a huge negative impact on local businesses. Restaurants have patrons getting sick or nauseous from the emissions; guest-houses have clients leaving; local businesses have received public reviews on travel websites telling visitors not to visit Hout Bay. The harbour is ripe for development and with this will come further restaurants, guest-houses and other tourist attractions, bring job creation – but nothing can be done while Oceana continue to produce these emissions. Oceana would argue that they create jobs in the community, but the effect on other businesses and the impact that they put on other jobs being created is arguably more. Lack of information, transparency, communications and credible measurement: The local community has for years been expressing concerns and frustration about the negative impact that the factory has. Oceana does not communicate with the community and we are left in the dark as to their plans and development. They have never had a public meeting where they have met residents or attempted in any way to allay frustrations or concerns. Likewise, the City conducts piecemeal "measurements" of the odours impact, always communicating that concerns are over exaggerated or that the odours are not offensive. These have time and again been shown to not been credible (for example, a measurement of the odour by City officials will be take in one spot for 5 minutes, when residents have clearly shown the issue to be elsewhere and over longer periods of time). Lack of information on Hout Bay's unique situation: We are time and again told that the emissions pose no short term health issues, and that the particles disperse over distance. However, there are no studies which measure the impact of the pollutants in low levels over days and weeks (as is the case when the factory is in production). There are also no studies which show the effects of the pollutants in Hout Bay's unique geographical situation – where the valleys and mountains create "pockets" where the gasses settle in high concentration for days on end (also where the residential areas are). <p>Until a specific study has been done on the impact of these emissions in the specific conditions that Hout Bay create, the AEL should not be renewed.</p> <ul style="list-style-type: none"> Lack of Environmental Impact Assessment (EIA): Our understanding is that when the factory first was built, no EIA was ever conducted, and none has been done since. <p>Until an EIA has been done, the AEL should not be renewed.</p> <ul style="list-style-type: none"> Lack of credible complaints register: The only "complaints register" is managed by Oceana, which is in itself a conflict of interest. These complaints have never been audited or made public and there is no way of know that all are recorded or handed over by Oceana. In addition, the only way that anyone can complain is via the website created by Oceana, which is frequently down for months at a time. There are reports that Oceana discounts any complaints about the odour as it is "part of normal operations". As such, local businesses and resident have lost faith in reporting complaints, choosing to use social media and other platforms, 	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. <p>In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard.</p> <ul style="list-style-type: none"> A black smoke incident occurred on 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and insignificant to no health risks. A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required. Note that the factory has been operating in Hout Bay since 1958. Lucky Star provides communication and plans for the factory through their website. It has been the company's intention to have a public meeting during 2017, however due to many unrest situations in Hout Bay during the last months it was decided to rather have a meeting after the public participation process has been completed and during a time that unrest has stopped to ensure safety of all stakeholders.

			<p>and therefore the complaints registers offered by Oceana cannot be seen as credible or representative of the concerns of the community.</p> <p>Unless a new and transparent complaints register is formed, managed by the City, the AEL should not be renewed.</p> <ul style="list-style-type: none"> • Concern with requested changes to AEL: <p>The application for the new AEL shows the request to add formalin to the processing. We strongly object to this. We already have concerns about the impact on health on those affected by the noxious odours, and the addition of a compound that is a known carcinogen is simply unacceptable.</p>	<ul style="list-style-type: none"> • Please note that the factory was established prior to the NEMA EIA Regulations coming into effect, hence Environmental Authorisation was not required. Only if changes to the factory triggers a listed activity in terms of the NEMA EIA Regulations, Environmental Authorisation would be required. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. • A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.
26	17/08/2017	Steven Michelsen	<p>Firstly, thanks for taking the time to read my mail of concern :) I would like you take a few considerations into mind before granting Oceana an A.E.L permit.</p> <p>As you know the smell is only the mask left behind by the robber, in a nutshell the PPS (particles per square) are well into the dangerous carcinogen zone, which basically means that in a matter of time us happy residents of Hout Bay will develop slow and painful cancers that will in the end kill us. We understand that the factory feeds many mouths and people are employed by Oceana, but for the greater good of the community it would be in the CCT best interest to deny there permit, and relocate the plant & let booming tourist destination of Hout Bay prosper and fill 100x more jobs :)</p> <p>Keep smiling</p>	<ul style="list-style-type: none"> • Thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. The smell may however cause nausea. • A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and insignificant to no health risks. • A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas

				<p>would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.</p> <p>As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.</p>
27	17/08/2017	Kerryn Du Rand	<p>Ref: WCCT059</p> <p>We heard today was the deadline to comment on Oceana fishmeal factory's reapplying for their Atmospheric Emissions License, including a variation to add formalin!</p> <p>We live in Harbour Heights and the stench from the factory is unbelievable! We are constantly nauseas, and suffer from allergies, headaches, and sinus problems due to our residential proximity to the factory. We want to move out from our home there but we can't find a tenant due to the smell and health implications of the factory. There is a large residential area where we are (Harbour Heights) and we are all suffering and sick as a result of the factory's emissions. The license really needs to be denied for health reasons. When the wind blows (which it often does in Cape Town) the whole of Hout Bay experiences the smell and we can't escape it anywhere in the bay.</p> <p>Please will you consider our requests and decline this license. We would be forever indebted to you! Please contact me if you have any questions.</p>	<ul style="list-style-type: none"> • Thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. <p>Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization's recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions.</p>
28	17/08/2017	Amy Von Willigh	<p>With regards to the renewal of the license of Oceana, Hout Bay, I have great concerns about the use of formaldehyde. I am concerned of the safety of the Hout Bay residents, as well as the factory workers and the long term effects of formaldehyde on the health of the Hout Bay people.</p> <p>Please consider this aspect when assessing the renewal.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. <p>The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase.</p> <p>Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds.</p> <ul style="list-style-type: none"> • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. <p>The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>"</p> <p>Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. • A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. <p>In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.</p> <p>As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.</p> </p>

29	17/08/2017	Tamarin Liebenberg	<p>My name is Tamarin liebenberg and I live in Hout Bay (chaplains view South, Liverpool Street) with my little girl pretty close to Oceana Please Please do NOT renew their license as it is unliveable and has severely affected our health – when emissions are high we struggle with chest issues and get sick and have severe headaches. It really is the most vile air to breathe and makes for unliveable conditions for all of us. Oceana impact tourism and locals livelihood as well as locals health and wellbeing in only a negative way Please do not grant this</p> <p>I am happy to go on the record and provide letters from the Hout Bay medical centre to confirm</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • Internal analysis data, as well as independent analysis conducted by Department of Environmental Affairs (DEA) and CSIR, have shown that these emissions are not harmful to the surrounding community as they are well within World Health Organization’s recommended levels. There are no set regulatory limits for odour and, unfortunately, human olfactory senses are highly developed and therefore extremely sensitive to unpleasant aromas. The plant utilises sea water scrubbing, chemical scrubbing and/or gas incineration in order to minimise these emissions. • Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. • The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. <p>In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard.</p> <ul style="list-style-type: none"> • A black smoke incident occurred on 28 July 2017: The incident was reported to City of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town’s Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory’s odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.
30	17/08/2017	Mariya Badeva-Bright	<p>Ref: WCCT059 - Renewal of Oceana’s Atmospheric Emissions Licence</p> <p>[1] Thank you for the opportunity to express my views on the proposal to renew the Atmospheric Emissions License for Oceana.</p> <p>[2] My name is Mariya Badeva-Bright. I own a property and reside at 12 The Spinnaker, Westfort Road, and Hout Bay, in an area known as Northshore. My family consists of myself, my husband, and two small daughters. We purchased our property and moved to Hout Bay in September 2015.</p> <p>[3] A few months after our move, in the middle of the night, we were awoken by incredible stench of rotten cabbage. My younger daughter, then merely one year old, was crying, screaming and scratching her eyes - behaviour we had not seen before. She was, clearly, being affected by the emissions from Oceana. For the next months, and sometimes in sweltering heat, we would keep all doors and windows of our house closed, with wet towels at the crevices to keep as much of the stench away, so my children could sleep.</p> <p>[4] Having purchased and spent on, the otherwise modest property we reside in, over R 2, 95 million, we were now unable to enjoy the fresh ocean air and beautiful view that we paid for. We are embarrassed to invite friends over, and when they do come, we have to provide lengthy explanations about the stench. Our enjoyment of our own home was, and continues to be, severely diminished whenever Oceana is in production.</p> <p>[5] Discouraged by the lack of attention by the City of Cape Town, and by Oceana, to the problem despite my many protestations and complaints, I briefly placed my property on the market for sale in mid-2016. I have been unable to sell the property, and one of the reasons advanced has been the negative effect of the Oceana pollution on the area. Thus, Oceana directly impacts on the value of my property, and my economic interests.</p>	<ul style="list-style-type: none"> • Thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory’s odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. <p>Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds.</p> <ul style="list-style-type: none"> • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults.

[6] For the above reasons - health reasons and implications of sulphur dioxide on the health of humans; and for the negative impact on my economic situation personally, I believe Oceana should not be granted a license.

[7] I understand that Oceana has now applied for a renewal of their license, and that they plan to introduce the use of formalin and/or formaldehyde in their processing.

[8] I strongly oppose issuing Oceana with permission to employ the use of a harmful, for humans and the environment, substances such as formalin and formaldehyde. A quick scan of the medical literature reveals the following health problems associated with formalin and formaldehyde exposure.

[9] A century-old journal article identifies formalin and formaldehyde as highly toxic with the following impact on human health:

1. The inhalation of formaldehyde gas in even small quantities is followed by bronchitis and pneumonia. Pneumonia is due to the inhalation of the gas and not to secondary infection.
2. Formalin belongs to that rare group of poisons which are capable of producing death suddenly when swallowed.
3. The introduction of formalin into the stomach is followed by the production of a gastritis which varies greatly in character.
4. Intraperitoneal injections of formalin cause peritonitis of a fibrin-haemorrhagic character.

(Martin Fischer, "The Toxic Effects of Formaldehyde and Formalin" , J Exp Med. 1905 Feb 1; 6(4-6): 487-518, available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2124506/>)

[10] Results from human epidemiological studies, animal inhalation studies, and cell culture assays suggest that formaldehyde has the potential to cause adverse human health effects, including cancer. Based on these findings, the 1990 Amendments to the Clean Air Act in the United States specifically define formaldehyde as a toxic air pollutant.

[11] The United States Environmental Agency classifies formalin and formaldehyde as cancerogenous substances. A University of Cincinnati study, published on the EPA website, that was conducted over 4 years found that exposures to formaldehyde, acrolein, and other aldehydes occur at work, in homes, and outdoors. Inhalation of high doses of formaldehyde has produced nasal tumours in laboratory rats, and lower concentrations have irritated eyes and air passages in humans.

(Leikauf, George D. , "Final Report: Inhalation of Aldehydes and Effects on Breathing", available at: <https://cfpub.epa.gov/ncer/abstracts/index.cfm/fuseaction/display.abstractDetail/abstract/2315/report/0>)

[12] The Occupational Safety and Health Administration of the United States Department of Labour classifies formaldehyde as a toxic and hazardous substance with effects on the respiratory system, skin, eyes and internal organs. See full details here: https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10078

[13] The National Cancer Institute has published authoritative information on the risks posed by formaldehyde here: <https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/formaldehyde/formaldehyde-fact-sheet#g4> They cite the following international agencies, who have classified formaldehyde as a carcinogen:

"The International Agency for Research on Cancer (IARC) classifies formaldehyde as a human carcinogen (2). In 2011, the National Toxicology Program, an interagency program of the Department of Health and Human Services, named formaldehyde as a known human carcinogen in its 12th Report on Carcinogens (3)."

(2) International Agency for Research on Cancer (June 2004). IARC Monographs on the Evaluation of Carcinogenic Risks to Humans Volume 88 (2006): Formaldehyde, 2-Butoxyethanol and 1-tert-Butoxypropan-2-ol. Retrieved June 10, 2011, from: <http://monographs.iarc.fr/ENG/Monographs/vol88/index.phpExit Disclaimer>.

(3) National Toxicology Program (June 2011). Report on Carcinogens, Twelfth Edition. Department of Health and Human Services, Public Health Service, National Toxicology Program. Retrieved June 10, 2011, from: <http://ntp.niehs.nih.gov/go/roc12>.

[14] Clearly, the dangers of the proposed process will increase the risk for my family and myself to live in Hout Bay. Furthermore, it will increase the risk for all those, who live near the factory - the residents of Hangberg, Hout Bay Heights, Northshore, Beach Estate, Scott Estate, if not even further.

The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. Formalin concentrations as such should not pose a health risk in Hout Bay."

Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study.

- A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and insignificant to no health risks.
- A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.

			<p>[15] I am, further, concerned about the potential for pollution of the waters around the factory, as well as the well-being of the aquatic life in the harbour.</p> <p>[16] I am also concerned about the impact all of the above will have on tourism and the development of the Hout Bay community. The impact on the social and economic well-being of all will be negatively impacted.</p> <p>[17] I urge the City of Cape Town to decline the issuance of a new AEL to Oceana, and that the factory's operations are stopped. This factory has no place in a residential community.</p>	
31	17/08/2017	Kiara Worth	<p>As the facilitator for Fresh Air for Hout Bay (FAHB), and on behalf of our 626 registered members, I would like to submit our comment on the application for the renewal and variation of Oceana's Atmospheric Emissions Licence. It is the opinion of FAHB that Oceana's operations have a severe negative impact on life in Hout Bay and for this reason, the licence should not be granted. We have comprehensively detailed a range of concerns in the attached document, from health impacts, delayed access to health information, concerns over the proposed use of formalin, well-being impacts, and business and development impacts, in addition to other concerns.</p> <p>As part of the public participation process, we expect that all of our concerns will be taken into account and we kindly request that a comprehensive formal response be provided to us regarding the concerns raised. Please let us know when this can be expected and what further efforts will be made to follow up with the comments provided by the residents.</p> <p>In response to the call for public participation regarding the renewal and variation of the Atmospheric Emissions Licence (AEL) for Lucky Star Ltd., As detailed in terms Section 46 & 47 of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), Fresh Air for Hout Bay would like to submit this formal comment and be registered as an Interested and affected party. It is the position of Fresh Air for Hout Bay that the renewal and variation To the AEL should not be considered, for the reasons detailed in this report.</p> <div data-bbox="682 1039 1418 1780" style="border: 1px solid black; padding: 5px;"> <p>In response to the call for public participation regarding the renewal and variation of the Atmospheric Emissions Licence (AEL) for Lucky Star Ltd., as detailed in terms Section 46 & 47 of the National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004), Fresh Air for Hout Bay would like to submit this formal comment and be registered as an interested and affected party.</p> <p>It is the position of Fresh Air for Hout Bay that the renewal and variation to the AEL should not be considered, for the reasons detailed in this report.</p> <p>1. Introduction and Overview of Fresh Air for Hout Bay</p> <p>There has been a long history of public discontent with Lucky Star Ltd.'s (henceforth referred to as Oceana) operations. As part of its fishmeal and fish oil production process, the plant releases a 'cocktail'¹ of emissions, the most predominant of which is Hydrogen Sulphide, and the result is a strong noxious odour. Described as a 'mixture of rotting flesh combined with raw sewage and a splash of sour fetid vomit',² the odour has been a contentious topic in the community for decades.</p> <p>Many people feel that the odour is a public nuisance, arguing that it has a negative impact on health and well-being, and hinders the growth of economic sectors such as tourism and local business development. In 2013, concerned residents formed the community interest group Fresh Air for Hout Bay (FAHB) that is committed to eliminating the odour from our community.</p> <p>FAHB currently has an official membership of 627³ individuals as documented through formal registration on our website. We engage informally with a further 2,077 people on our social media sites (1,452 on our official FAHB Facebook page and a 1,625 on our FAHB discussion platform). In addition, FAHB gathered the support of 2,040 people on a petition calling for change.</p> <p>This makes FAHB one of the larger community groups in Hout Bay and it is under this representation that we submit this comment.</p> </div>	<ul style="list-style-type: none"> • Thank you for your comment. • Please note that the comments and responses table will be made available on the PBPS website as indicated in previous correspondence. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. The smell may however cause nausea. • Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. • The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. • In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard. • A black smoke incident occurred on 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. • A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas and insignificant to no health risks. • A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required. • Please note that Lucky Star did an independent HIA, as requested by the City of Cape Town.

2. Concerns about the renewal and variation of Oceana's AEL

There are a variety of concerns regarding the impact of Oceana's operations. While many of these concerns have been discussed anecdotally on our social media sites, FAHB conducted a community-based [Air Pollution Impact Survey](#) over a 5-month period (March – August 2017) to officially document the impacts in response to this AEL renewal application.

A total of **432 surveys were completed, representing 2,374 members of the community.** Of this, 99% of respondents recognised Oceana's operations as being problematic for Hout Bay and 97% believed this was a violation of their constitutional right to live in an environment that is not harmful to their health and well-being.

The following impacts were documented as part of this survey.

2.1. Health Impacts

The UN World Health Organisation (WHO) defines health as "a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity". The WHO provides guidelines about the safety of Hydrogen Sulphide emissions, yet these are based on research conducted on short-term exposure – there is no recognised research on chronic, low-level exposure and certainly no research specific to the situation in Hout Bay and its unique geographic location.

Bearing this definition of health in mind, **90% of respondents felt that the emissions from Oceana negatively influenced the health of themselves and their families**, citing an array of health-related symptoms experienced only when the factory is in production.

The following symptoms were recorded:

Ailment	Percentage
Nausea	78%
Headache	75%
Respiratory ailments	59%
Coughing and wheezing	35%
Asthma	12%

Additional symptoms included burning eyes, sore throat, shortness of breath, bronchitis and skin irritations. 61% of respondents felt these impacts prevented them from doing their daily activities. Respondents in the survey commented the following:

"We get sick. I have a child that complains about nausea and headaches only when the factory is operating."

"I run a medical practice from Victoria Avenue and my PA, patients and I get nauseas from the smell. One of my patients vomitted on my carpet (not due to illness)... My home is 8km away from my office and we can even smell it there."

"I suffer from asthma. Every time the factory is in production I have an attack. I had absolutely no attacks when they are closed. The doctor said it could be aggravated by the air pollution."

2.2. Delayed Access to Health Risk Assessment

In 2016, the Housing Directorate conducted a Health Risk Assessment as part of a housing development planned for Hangberg. The then MAYCO Member for Health, Cllr. Mamkell, stated that the Health Risk Assessment found the emissions from Oceana to be potentially harmful to health, and [housing planned in the vicinity of the factory was halted](#). FAHB requested access to the report, commissioned by the Housing Directorate, but this was denied claiming the inclusion of sensitive land information. Despite suggesting this information be redacted, the Housing Directorate continued to deny access to the report.

FAHB applied for the Health Risk Assessment through the Public Access to Information process (PAIA), but again this was denied by the City, stating the report had not even been received by the PAIA offices. FAHB then appealed to the Speakers Office to revoke this decision and on 15 August 2017 received confirmation that access is being granted to portions of the report. No documents have yet been received, and it has taken more than 10 months to get this confirmation alone.

The statement made regarding the City of Cape Town denying access to the Health Risk Assessment could be due to another process such as an appeal being in process. Therefore, information would not be able to be accessed until that process has concluded. This should however be taken up by the competent authority.

- Concerns regarding health and well-being is noted and should be taken into consideration.
- Please note that the staff that left the company retired and/or resigned.
- Please note that the factory was established prior to the NEMA EIA Regulations coming into effect, hence Environmental Authorisation was not required. Only if changes to the factory triggers a listed activity in terms of the NEMA EIA Regulations, Environmental Authorisation would be required.
- Concerns regarding the complaints register should be taken up with the City of Cape Town.
- Stakeholder meetings have been standardised and will be conducted once per annum. Stakeholder meeting minutes take long to finalise because of attendees not agreeing with content and continuous changes being made.

While we have not yet had the opportunity to review the documents, we believe that the City deliberately withheld this information, respecting the interests of industry and not those of the concerned residents. This does not demonstrate the transparency, nor the democracy, that the City is supposed to embody.

2.3. Health Concerns over the Use of Formalin

While considerable health concerns already exist, the proposed variation to include the use of formalin (formaldehyde) as a raw material in the process, adds to this concern significantly.

It is known that chronic inhalation exposure to formalin can result in respiratory symptoms, and eye, nose and throat irritations. Occupational studies have noted statistically significant associations between exposure to formalin and increased incidence of lung and nasopharyngeal cancer – it is a well known carcinogen.

While we understand that a risk assessment would be conducted, we have no confidence that concerns raised would be taken into account – we have already seen the response to current health concerns, and the lack of disclosure of the health risk assessment adds to this further.

2.4. Well-being Impacts

According to Chapter IX, 26-1-c of the Air Quality Management By-Law passed in 2015:

"No person shall... cause any reasonable interference or likely interference through air pollution which may adversely affect the health or well-being of any person or living organism; or the use

and enjoyment by an owner or occupier of his or her property or environment."

95% of respondents felt that Oceana's operations violated this by-law and that the emissions negatively impact the well-being of themselves and their families. 98% felt the emissions impacted their ability to enjoy their own homes and social activities. Specifically, the survey recorded the following well-being impacts, as experienced by the community:

Ailment	Percentage
Frustration	88%
Anger and anxiety	70%
Embarrassment	60%
Stress	46%
Distraction	38%

Mental effects such as depression, fatigue and sleeplessness, mood disturbance and a decrease in working efficiency have also been recorded. 61% of respondents felt that Oceana's odour pollution prevented them from doing their day-to-day activities. As respondents have commented:

"It's astonishing what a sick dirty vomit like smell can do to ones life. Everything feels dirty. It's repulsive. Truly. To understand it – one has to imagine there was an open sewer under your bed. Really. Imagine the rancid smell floating around, inside the home. No escape. It's obscene."

"It's so revolting I get in my car and leave Hout Bay."

"If they produce during the day it makes me feel so dizzy and nauseas that I am unable to concentrate. If they produce at night the odour either keeps you awake or actually wakes you up. So the next day you're tired, feeling sick, and you still have to breathe the stink."

"My children's school is often affected badly by the smell and they struggle with it. It makes it harder to concentrate and the children don't want to be outdoors."

"The beauty and the night smells of the evening are stolen. You cannot escape the penetrative and vile smell. It's revolting and it should be a crime."

"It makes life miserable."

In terms of property, 69% of respondents were property owners in Hout Bay and 57% felt the emissions negatively impacted on their property value. Various real estate agencies in Hout Bay have confirmed that the odour from Oceana is a major consideration when purchasing property and has often led to a decrease in value. As one respondent commented:

"I am a real estate agent. I have not had a successful viewing or resultant sale when the factory is polluting the air. Very embarrassing showing people homes when the smell is about."

In addition, 99% of respondents felt the odour created a negative perception of the community and a further 70% stated that the odour had made them consider leaving Hout Bay.

"I tell people not to come to Hout Bay anymore. It's just too embarrassing."

"I am actually being driven away from my own home."

2.5. Business and Development Impacts

Fifty-one (51) businesses participated in the survey and 82% of these commented that the emissions from Oceana negatively impacted their daily business operations. A further 74% stated they suffered a financial loss as a direct result of the odour pollution. It is important to note that **these businesses alone employ 149 local people, accounting for higher employment levels than those found at the factory itself.**

The following impacts to business were noted in the survey, with additional comments:

Impact	Percentage
Complaints received about the odour	72%
Clients leaving the business premises due to the odour	44%
Reduced productivity due to minor health irritations	56%
Reduced productivity due to embarrassment	44%

"I run a retail shop in the harbour. The number of visitors drops drastically on a smelly day. No visitors, no customers. No customers, no sales."

"Our guests have cancelled their bookings with us because of the smell. We bought extra fans to try to dissipate the smell and had to placate angry guests in our questhouse."

This information supports the findings of the Economic Opportunity and Stakeholder Research report for tourism development in Hout Bay. The report, conducted by Towards Uhuru and in collaboration with the Hout Bay Partnership, notes that one of the key challenges facing tourism development is the odour from Oceana's operations. **It is a key recommendation of this report that suitable alternative locations be found for the production of fishmeal** considering the negative impact current operations have on tourism and business development. **These are some comments from respondents:**

"Tourism in Hout Bay would give more jobs than the factory could ever scratch up. It's obvious. Hout Bay could be world class."

"I have a real affection for Hout Bay after being a regular visitor for many years but had this been my first visit here I would have NEVER returned because of this foul putrid smell which permeates every part of the village. It's awful and tragic that such a lovely community can be so polluted. I appreciate that many people are employed by Oceana, but what about all the people who have employment because of the tourism industry? What happens when the tourists stop coming because the place 'stinks'? It breaks my heart and my heart belongs to Hout Bay."

2.6. Additional Concerns

While these immediate problems persist, the community has an additional set of concerns regarding the general situation.

Decrease in Oceana's employment and negative impact on socio-economic development

FAHB is concerned about the incredibly low rate of employment at the factory itself – the factory currently employs approximately less than 1% of the local Høngberg community. In addition, we note there has been a 10% decrease of employment at the factory over the past two years – permanent land-based staff reduced from 102 in 2014⁵ to 92 in 2016⁷. Informal correspondence with Oceana suggests the reduction was due to normal operating changes but the decline is alarming.

It is the opinion of FAHB that Oceana's contribution to employment in Hout Bay is relatively low, especially considering the number of jobs it prevents from being actualised due to the impact of their emissions. Indeed, there is a higher rate of employment from the businesses cited in this survey alone than that offered by Oceana.

Oceana's operations have a negative impact on the socio-economic development of Hout Bay and for this reason the renewal of their licence should not be considered. We further note that were Oceana to relocate operations, there would not be significant job loss – Oceana offered relocation packages to all staff in their proposed 2015 closure, and it is assumed this option would still be available.

Lack of Environmental Impact Assessment

Despite Oceana enjoying certain legal rights to their production, FAHB does not believe the City has followed due process to determine the impact of this industry on the community. We are aware that **no environmental impact assessment has ever been conducted** and there is no immediate intention to do so. Instead, the community is presented with an application of renewal for Oceana's licence, disregarding the countless negative impacts that have been expressed to the City. Still no formal impact assessment has been conducted for the factory and its operations.

Discrepancy over complaints database

The recording and documenting of complaints has been very questionable over the years and a formal complaints register was only introduced in 2014 on Oceana's website. The website is frequently down, sometimes for months at a time, with issues ranging from being hacked, to invisible complaints forms, to incorrect contact information.

While Oceana claims the registries are being maintained, no records have been disclosed and there is unreasonable bureaucratic procedure to access registries through the City. A review of initial registries show there are significant gaps, including that Oceana disregards complaints about odour and instead considers them as 'normal'.

There is no confidence that the complaints registries are maintained appropriately, nor that they fully reflect impacts on the community. Further to this, considering that Oceana operates the complaints registries, there is a blatant conflict of interest – the perpetrator of a complaint should not maintain a complaints register against themselves. We have raised this concern with the City with no response, much like the concerns raised in the complaints registries have received no response either.

Poor institutional engagement with the community

Despite concerns being raised about Oceana for more than 20 years, the City has made no effort to discuss, investigate or validate concerns with residents. There have been no public meetings, no information sharing or communication, no investigations to address concerns. Instead, residents have received intermittent reports after random monitoring exercises⁸, containing inaccurate information that maintains the situation is perfectly acceptable.

Oceana's engagement with the community has been much the same. Despite establishing the Community Stakeholder Forum to 'facilitate more comprehensive communication and understanding between the factory and the community', it has been largely defunct, with only two meetings conducted since its establishment in 2015 and no further communication since. Minutes from the meetings have taken upwards of six months to finalise and the forum in no way serves to aid communication between the residents and the factory.

			<p>Despite committing to "ensure that all stakeholders receive accurate information regarding the factory, its operations, systems as well as changes that are made due to strategic and operational requirements", we note that no notification went out to residents, nor even to the members of the Community Stakeholder Forum, regarding the application for this licence renewal, despite the information being posted on their site on 18 July 2017. This poor communication is indicative of the attitude towards transparency that Oceana has demonstrated over the years.</p> <p>3. Conclusion</p> <p>FAHB firmly believes that current practices at the Oceana fishmeal factory negatively influence life in Hout Bay and additionally prevents the positive growth and development of the community.</p> <p>A summary of our concerns is as follows:</p> <ul style="list-style-type: none"> • The current emissions from Oceana already pose a health concern, with symptoms such as nausea, headaches, and respiratory ailments clearly documented. • The City of Cape Town has delayed access to the Health Risk Assessment, containing pertinent information about Oceana's emissions, and after 10 months we are still waiting for the documents. • The introduction of formalin as a raw material raises further health concerns, including increasing respiratory ailments and being a known carcinogen. • The noxious odour emitted by Oceana has significant negative impacts on well-being and is a violation of the Air Quality Management By-Law. <ul style="list-style-type: none"> • The noxious odour negatively impacts businesses in Hout Bay and prevents growth and development in the tourism and business sector. • Oceana's employment numbers are low relative to their significant negative impact on job creation and socio-economic development as a result of their emissions. • No environmental impact assessment has been conducted for the factory and there is no consideration for the impact the factory has on the community. • The complaints register is largely faulty and inaccurate and the concerns raised by the community are not taken into account. • Thus far, both the City of Cape Town and Oceana have not demonstrated transparency in their actions, failing to acknowledge, respond to, or rectify the concerns raised by residents. <p>FAHB strongly objects to the renewal and variation of Oceana's licence.</p>		
32	17/08/2017	Paula Kelly	<p>This email is in connection with the reapplication of The Oceana Fishmeal Factory for their Atmospheric Emissions Licence. I think it would be an absolute tragedy if this Licence was granted again. The Factory emits the most foul smelling & toxic fumes that almost devour our precious air space in the small Village of Hout Bay. We as a residence are very protective of our surroundings & the fact that our Village is just that, a Village. What this factory emits into our atmosphere has irreversible effects on not only the people who live there but to our precious wild life & vegetation.</p> <p>I feel it is not even an option that this Licence be granted.</p>		<ul style="list-style-type: none"> • Noted, thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. • Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. • The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. • In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard. • A black smoke incident occurred on 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day.

33	17/08/2017	Sandra Silbernagl	<p>I am a resident of Hout Bay and am against the renewal of the Atmospheric Emissions License for Ocean fishmeal factory (WCC059).</p> <p>I am allergic to the emissions of Oceana, I have allergic asthma and on days that the smells reach my house my health get compromised; my eyes itch and I cannot see properly, I need to use my pump and my sinuses get affected which results to a blocked nose and often a headache. Also my children often suffer from headaches and nausea on the days the stench reaches our house.</p> <p>On top of the already damaging effects of the emissions by Oceana for me and my family, formalin is toxic and causes a health risk to all living beings in Hout Bay.</p> <p>I am sure that our wellbeing is more important to the city than a factory which could locate to a non-residential area so I trust that you will do the right thing and deny Oceana the License they have applied for.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. • Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. • The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. • In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard. • A black smoke incident occurred on 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. • Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. • Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. • A Health Risk Assessment was conducted in Hout Bay by Infotox (Pty) Ltd in 2016, relating to the emissions of Lucky Star. Various study areas were selected in Hout Bay (called receptors) of which Hangberg was one. The assessment concluded that contaminants of potential concern, namely Hydrogen sulphide, fatty acids, ammonia, Trimethylamine and Methyl mercaptan, had no significant odour annoyance in the study areas. • A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various
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				<p>communities in close proximity and further away from the Hout Bay plant were well below the guidelines.</p> <p>In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1×10^{-6} and 0.4×10^{-6}. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible.</p> <p>As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.</p>
34	17/08/2017	Cindy Cordingley-Wiid	<p>Comment: The licence should not be renewed as the emission smell from Oceana – dependant on wind direction – causes my entire family to become sick with nausea. Some days you need to close all the door and windows and lock yourself inside to get away from the stench.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.
35	17/08/2017	Lisha	<p>I OJBECT and will continue to do so until the Oceana license is revoked</p> <p>I live in Hout Bay</p> <p>Unacceptable that this is even up for debate</p>	<ul style="list-style-type: none"> Noted, thank you for your comment.
36	17/08/2017	Kiara Worth	<p>While you should have received the comments submitted by Fresh Air for Hout Bay, I would like to add my personal comments as well.</p> <p>Oceana's operations in Hout Bay are an atrocity. Not only is the industry unsustainable in every possible form, the negative impacts caused by their emissions preventing the growth and development of Hout Bay, and essentially its own sustainability.</p> <p>I can personally testify to the serious well-being impacts that have occurred as a result of Oceana's emissions. I am unable to work, I am unable to concentrate, I am unable to live peacefully in my own home, I am embarrassed to bring people to Hout Bay, and I feel sick to my core every time the factory is in production. I find it hard to believe an industry has operated for so long, with so little controls, and for the years that I have been here, there has been no change, no improvement, and no acknowledgement of our experiences.</p> <p>What is more atrocious, however, is the City of Cape Town's complacency to address this issue. We have tried to register the odour as a public nuisance but there is a loop-hole in legislation that clearly demonstrates the City's willingness to favour industry above the interests of the people they represent. Over the past five-years I have watched how the City has denied and avoided this issue, spouting off copy and pasted emails, and refusing to consider - or even acknowledge - the very serious health, well-being and business development concerns that Oceana's emissions bring. This is a political decision and the City has not responded to it. As a result of this experience, I have lost faith in the City of Cape Town. I moved to this city because I believed that it had the most progressive local government in the country, that it followed the principles of democracy and integrity, and that it actively cared for its peoples. I no longer have these views about the City of Cape Town. The City has let down the people of Hout Bay and you have lost my vote.</p> <p>And after all of this, we are then requested to comment on the renewal of Oceana's AEL, which includes a variation to include formalin in the operating process. While I appreciate that at last there is some form of public participation - the first ever that I am aware of - we <i>already</i> have significant health and well-being concerns and the inclusion of formalin, as a well-known and highly dangerous toxin, adds to these concerns further. It is very disappointing to see this and unfortunately I do not have confidence that either Oceana or the City will follow due process in protecting the rights of the people of Hout Bay.</p> <p>For a full detail of how Oceana's emissions impact the community, and myself, I refer you to the Fresh Air for Hout Bay comment document - I fully support their position and do not believe the licence should be renewed, nor should the variation be accepted.</p> <p>Many thanks...</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. Please note that the factory has been in the Hout Bay Harbour since 1958. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard. A Black smoke incident occurred on 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. Any issues that you may have with the City of Cape Town will have to be taken up with them. Public Participation meeting was held 03 December 2002 for the upgrade of fishmeal plant.

				<ul style="list-style-type: none"> Formalin is internationally used at fishmeal plants as a processing aid. The use of formalin in the production process facilitates the separation process of the solids and the liquids that are produced in the production phase. The formalin is pumped from an existing 63m³ formalin storage tank to the existing smaller 2m³ tank from where it is pumped to the fish feed hopper before the fish is cooked. This processing aid assists in the bonding of the solids which increases the ease of separation in the decanters and the tricanter. The addition of the processing aid results in less solid carry over in the liquid phase. Excessive carry-over of solids to the liquid phase results in process upsets in the evaporation process and therefore a decrease in plant production throughput. The decrease in production rate is directly proportional to the increase in fish age and therefore indirectly also an increase in odorous compounds. Formalin exposure was measured in Hout Bay by the CSIR in 1996. Formalin badges were put on learners from Sentinel Primary, Kronendal Primary and Hout Bay High School as well as some adults. The conclusion was that "Personal exposure yields a maximum of 0.010 ppm. This is much lower than the community exposure limit of 0.02ppm. <u>Formalin concentrations as such should not pose a health risk in Hout Bay.</u>" Although this was done in 1996, it must be emphasized that the formalin addition levels have decreased over years in the fishing industry therefore the emission from the addition of formalin as a processing aid will result in even lower results than measured in 1996 during the CSIR study. A Formalin Atmospheric Impact Assessment was conducted during May 2017 and concluded the following: The resulting formaldehyde concentrations at the various communities in close proximity and further away from the Hout Bay plant were well below the guidelines. In addition, the closest communities around the Hout Bay plant are expected to be within the cancer risk zones of between 0.1 x10⁻⁶ and 0.4 x10⁻⁶. This means that a person in any of these areas would have a less than 0.4 in 1,000,000 chance of developing cancer due to a lifetime exposure. The carcinogenic risk is therefore considered negligible. As such, it can be concluded that the potential atmospheric impact due to the use of formalin at the Hout Bay Fishmeal Plant will be extremely low or negligible, and no additional mitigation measures will be required.
37	17/08/2017	Ronald and Marianne Marsh	<p>We have been residents of Hout Bay for 22 years.</p> <p>The foul odour caused by the emissions from the Oceana fishmeal factory in the last five years are totally unacceptable. I have been woken up on numerous occasions short of breath with blinding headaches. I recall it was bad 20 years ago and they were forced to do modifications to their stacks, it must be time to do major repairs or renovations. Best option would be relocation.</p> <p>As a healthy person the smell is disturbing/unpleasant/distressing but even more so for older people, those with breathing problems and young children. It is a thick lingering cloying smell that one can almost taste.</p> <p>We are forced to live with doors and windows closed to be able to escape the vrot smells.</p> <p>If this was a small fishing village with fishing village rates and taxes the employment opportunities might be worth the discomfort. However in a town that has a high number of tourist attractions and guest houses it is unacceptable. I have cancelled dinners and lunches more times than I can recall due to the foul smell.</p> <p>We pay exorbitant rates and taxes, yet we live in an area with a foul smelling factory that has no regards for its neighbours or society</p> <p>We are totally against the license being renewed.</p>	<ul style="list-style-type: none"> Thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard. Black smoke incident 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system

				<p>and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day.</p> <ul style="list-style-type: none"> Lucky Star has made numerous improvements and upgrades to the factory in order to improve the facility as well as decrease emissions and smell. Noted
38	17/08/2017	Daniel Bernberg	<p>I object to the license renewal for Oceana in Hout Bay.</p> <p>They pollute our air, affecting our lifestyle, businesses, and most importantly our health.</p> <p>They negatively impact tourism.</p> <p>They negatively impact the psychology of the community.</p> <p>Beyond that they do not take complaints seriously or deal with them satisfactorily.</p> <p>They have caused financial hardship, and psychological suffering to a community that doesn't deserve it.</p> <p>Please give this due consideration and reject this renewal - you will free Hout Bay from an undeserved blight on this beautiful community.</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. A complaints register held of all complaints lodged via the website, email or telephonically. The plant conditions and H₂S levels are reviewed for period relevant to the complaint and plant upset conditions are investigated. The complaints register is monthly submitted to the City of Cape Town with each complaint, fish processed for the day and relevant information regarding the total volatile nitrogen of the fish. Complaints lodged directly to the City of Cape Town is investigated by the City and communicated to the factory to include on the complaints register. Noted
39	17/08/2017	Lisa Horne	<p>I have already submitted my online impact assessment form about how emissions from Oceana factory affect us living on Empire Ave, Hout Bay (Beach estate) but I believe we need to also email you before 5pm today.</p> <p>When the Oceana factory is in production mode spewing vile, toxic, putrid emissions into the air please note my following points:</p> <ol style="list-style-type: none"> 1. My Eyes become red and inflamed and itchy 2. My Throat gets sore and I feel nauseous 3. On certain occasions when it is done during the night/early am I wake up retching from the vile and putrid acrid stench coming in via windows. 4. I Have to close all the doors/windows and still the stench permeates (this is not acceptable as I have a right to fresh air and not be a prisoner in my own home at any time but especially when it's peak summer heat!) 5. If washing has been hung out to dry and the factory is in production mode I have to re wash clothes as the stench permeates fabric and it is disgusting! 6. Earlier this year had a severe case of sinusitis diagnosed by a Dr who said was caused by sinuses being irritated by something. That something was the vile putrid emissions from Oceania! <p>I therefore formally state that above are my reasons why the atmospheric emissions license should NOT be renewed!</p>	<ul style="list-style-type: none"> Noted, thank you for your comment. It is assumed that the online impact assessment form indicated in your comment is that of Fresh Air for Hout Bay. Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard. Black smoke incident 28 July 2017: The incident was reported to City Of Cape Town. It was concluded that the incident did not contravene Chapter V the City of Cape Town's Air Quality Bylaw of 2016. The black smoke was not emitted for more than 3 minutes in a continuous 30 minutes. The incident was due to the blocked lance and nozzles which lead to insufficient fuel passing through the combustion system and led to the oil in the combustion chamber to not combust and therefore caused black smoke once the combustion occurred. The problem was addressed the same day. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. Noted

40	17/08/2017	Gregory Magid	<p>Comment: I don't not believe the air license should be renewed based on the fact that it does not seem like they are in compliance with regulations, there is clearly and visibly effluent being discharged from the factory which causes disgusting smells/odour and contributes to continues sinus and health issues. If they are granted permissions to use more dangerous chemicals and this effluent is disposed of in the same manner (without/not effectively being cleansed via scrubber or bag houses) this will be more detrimental to the health of the occupants of Hout Bay (including negative environmental impacts on animals and flora) as well as decrease desire for tourists to visit the village because of the terrible smell and perception of filthiness.</p> <p>The fact is, if they were cleaning the air as they should be and as is required by law and regulation then there would not be any issues here. There is equipment available for this.</p>	<ul style="list-style-type: none"> • Noted, thank you for your comment. • Please state what regulations you are referring to. • The factory does not pump any effluent into the harbour. All effluent lines are connected to the main municipal line and, as per the standard operating procedure for the factory, water is only sent to the pump station upon confirmation of full pump functionality from the Water Treatment Operators. It is important to note that the fishmeal process does not produce any production process effluent as all liquids are evaporated in the Waste Heat Evaporator. There is therefore no waste stream from the process. That being said, the plant does generate wash water which is created during cleanup processes of the plant and plant equipment. • The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community. The smell may however cause nausea. • The factory does not pump any effluent into the harbour. All effluent lines are connected to the main municipal line and, as per the standard operating procedure for the factory, water is only sent to the pump station upon confirmation of full pump functionality from the Water Treatment Operators. It is important to note that the fishmeal process does not produce any production process effluent as all liquids are evaporated in the Waste Heat Evaporator. There is therefore no waste stream from the process. That being said, the plant does generate wash water which is created during cleanup processes of the plant and plant equipment. • Please note that the Air Emissions Licence stipulated what is required from the factory in terms of air emissions and air quality. Hence the AEL is required by the factory in order to operate.
41	17/08/2017	Astrid HJ Armatas	<ul style="list-style-type: none"> • OCEANA Factory so close to a residential area is totally unacceptable • Oceana's stinky, smelly and unhygienic emissions affect all and sundry in Hout Bay and right up the valley. • A factory of this kind should not be situated in a village where people reside. • This is 2017 and NOT the 1800's, where this type of practise took place. Surely there is solution in this time and age to such a bad emission problem, and should not be tolerated in modern time of 2017. Give us a break! 	<ul style="list-style-type: none"> • Thank you for your comment. • Please note that the factory was established in 1956 and that residential areas migrated closer to the factory due to Municipal planning. • Please note that Bylaws stipulate allowance for certain volumes of smoke emission during the processing period. In order to minimise the impact of emissions, the plant has employed various preventative and corrective actions which are communicated to and approved by authorities and audited during visits from Licensing Officials. • The fishmeal plant has four permitted smoke stacks for the combustion units and one for the chemical scrubbing stack. Due to the combustion of low sulphur oil, smoke is generated during plant start-up as well as during equipment installation and/or repairs. • In addition, the plant periodically releases steam, during blowdown, which tends to be more pronounced during still windless days as well as days with overcast and/or low ambient temperature. None of these emissions pose a health hazard.
42	17/08/2017	Madeleine Leonard	The stench is overwhelming and sticking. It is a welcoming idea to have an improvement in the quality of the air.	<ul style="list-style-type: none"> • Noted, thank you for your comment.

				<ul style="list-style-type: none"> The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.
43	17/08/2017	S Davids	The stink fish smell is a barrier in my class, learners can't concentrate, they often fall ill and vomit, some days it's really bad that we can't even open our door for fresh air.	<ul style="list-style-type: none"> Noted, thank you for your comment. The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.
44	17/08/2017	N Rabie	I honestly believe that a state of destitution will set in Hout Bay if Oceana Lucky Star Limited, does not start and continue proper environmental management and Air Quality Management. Poor air quality management does affect learners' ability to concentrate at Sentinel Primary.	<ul style="list-style-type: none"> Noted, thank you for your comment. Please note that the AEL is required for Lucky Star to operate in terms of Air Quality Act.
Accept				
1	14/08/17	Lizette Ruiters	Oceana is a great asset in the developmental society of Hout Bay where it is built. It provides employment to the majority of learners, parents in the community. Formalin can be used as long as it has a positive effect on the people of Hout Bay, we will endure it.	Noted, thank you for your comment.
2	15/08/17	James Wichman	As a born and bred citizen of Hout Bay, I fully support the renewal of the Lucky Star Hout Bay's application for the AEL. The fish smell as a certain individual claim as harmful has not physically affected anyone on medical grounds The Lucky Star Factory has been in existence since the 1950's and I have been the UFR blood of Hout Bay's Fishing community and should continue as it has always been. The fishmeal factory have provided employment to many residents both in Hout Bay and Out of Hout Bay and will increase unemployment and lead to crime etc. in our community closes to it.	Noted, thank you for your comment.
3	15/08/2017	Alfred Boonzaaier	I lived and worked in the factory when it was still called South African Sea Products. Not once did the effect of the fishmeal smell cause me or my family to be hospitalized. It is degrading that to think that people with all the motives want the fishmeal plant to close just to enhance their own financed gain, by that I mean enhancing the the Hout Bay Market. Why do you want to close the plant and render people and families jobless?? Have you no shame?? The fishmeal plant is built and operated at the love of sweat and tears of descent honest people who want to earn a decent wage to provide for their families.	Noted, thank you for your comment.
4	15/08/2017	Addeem Ebraahim	Most the Hout Bay harbour people are fisherman of which heir income is from the area. Hout Bay harbour is all years a fishing village and Oceana was all this years in Hout Bay providing work to all the people more than 50 years. Why should a permit not be granted, taking people's lives from them.	Noted, thank you for your comment.
5	15/08/2017	Fatima Samuels	This place Hout Bay has always been fishing village so why should a renewal of licence permit not be issued to Lucky Star. It's a place where people work to provide a living for their families.	Noted, thank you for your comment.
6	15/08/2017	Sameeda Dante'	I support application, it is needed to keep the air clear and clean. The smell could possibly cause young and old to become ill. As this is a community living close to the harbour and the factory people are continually exposed to the stench-It can become unbearable. Learners also can't concentrate when there is a smell in the air (and teachers also become affected) For the above reason I support the application.	<p>Noted, thank you for your comment.</p> <p>The unpleasantness of the fishy smell is a direct result of trimethylamines and hydrogen sulphide. These, along with other processing emissions, are all collected and ducted and then treated in the factory's odour suppression plant. The resulting emissions are negligibly low in concentration and do not pose a risk to the health of the community.</p>
7	16/08/2017	Ashely John Anderson	I A.J Anderson residing at the above mentioned address employing 10 youth from Hout Bay who are all bread winners for the respective families in addition another's workers are subcontracted on a ADHOL basis at the Lucky Star fishmeal plant. We are in support of the atmospheric emissions' license. Failure to do so will result in more unemployment which can lead to crime poaching, drug and alcohol abuse which are very high in this community.	Noted, thank you for your comment.
8	16/08/2017	Andre Sampie	I Andre Sampie have no objection the renewal of the renewal of the license of Lucky Star Limited, as they hold no threat to the community by virtue of their emissions. I have never experience ill health or any form of uncomfotability as a result of the emission of their factory.	Noted, thank you for your comment.

9	16/08/2017	Kobus Esterhuysen	We are a supplier of chemicals to Lucky Star. We would be negatively affected if the licence is not approved.	Noted, thank you for your comment.
10	17/08/2017	Roscoe Jacobs Secretary Hout Bay Civic Association	Find attached our letter and petition submitted to the City in relation to the Air Emission License for Oceana Groups Hout Bay Fishmeal Factory, WCCT059. Re: Reference Number WCCT059 The Hout Bay Civic Association calls on the City of Cape Town to grant/renew Oceana Groups Hout Bay Fishmeal Factory an Atmospheric Emissions Licence. Failure to grant this licence will impact the Hangberg community negatively. This will leave around a 100 people without work and their families without a bread winner. This excludes the seasonal/contract workers that are also employed. Unemployment in the adjacent Hangberg area is rife and not renewing this licence will increase to the already high unemployment rate. The closure of this factory will also impact the Hout Bay businesses which provide services to the Oceana Group Hout Bay Fishmeal Factory and their employees. We call on the City in granting this Licence to Oceana to also monitor the Air Emissions regularly to ensure that they align to International best practice. Along with our letter we are also resubmitting our petition which we had to the City, Department of Public Works and Oceana Groups in support of granting the Air Emissions Licences.	Noted, thank you for your comment.
11	17/08/2017	Jacobs Matthews	My concern as a member of this community is that I don't have a problem with Oceana because I have been here for the last 47 years, I think the community is blessed to have Oceana here as they are providing help to the community in various ways. If there is a disaster they are there. The smell is not an issue at all	Noted, thank you for your comment.
12	17/08/2017	Randy Robin Adams	Closing the factory because if the smell is totally wrong because we were born in that smell, raised and lived in it all our lives, so what's the use? Where is our people going to get jobs and the smell doesn't last all day.	Noted, thank you for your comment.
13				
14	17/08/2017	Jacqui Beukes	I think that if Oceana factory closes because of the smell then a lot of people and families in Hangberg will be jobless and be unable to provide for their families. So a solution can be worked out for the smell and save people's jobs because the factory has been in Hout Bay very long why worry about the smell now.	Noted, thank you for your comment. Lucky Star has been making improvements in terms of the smell and will continue to do so.
15	17/08/2017	Sharon Wagner	I lived in Hout Bay all my life and Oceana became part of this life. I have no problem with the factory because it supply our already destitute and unemployed community with work. A lot of families rely factory for work. It is important for this factory to stay functioning. On the other hand, Oceana contributes to the education of the schools in our community, Sentinel, Hout Bay HS and Sidjikamva HS benefit from many generous donations. Over so many years, both Sentinel and Hout Bay HS can be far the first time in the history of these schools to be owners of their first school bus and all thanks to Oceana. Also they generously provide the schools with assistance with food for families and feeding schemes.	Noted, thank you for your comment.
16	17/08/2017	Benjamin Joubert	This facility is in operation since 1958 and has service this community employment ever since. The in closure of ton-non approval of the AEL will result in facility and which unemployment will lead to unemployment in the community and that will include myself and I have three dependants that live off me who is currently employed at Lucky Star Hout Bay and the closure of the facility will also have an impact on the broader coloureds and black communities. This facility also has a rich history in this community. This is also a historical landmark of Hout Bay.	Noted, thank you for your comment.
17	17/08/2017	Crystalene Miller	I know that the factory has a bad smell but I think if Oceana closes then a lot of people will be out of work. The community of Hangberg benefits from the factory.	Noted, thank you for your comment.
18	17/08/2017	Liesel Mathews	I feel that Oceana Brand must get the license because all the people and especially the community of Hangberg get work opportunity from Oceana and we know that it smell very bad at times but Oceana is prepared to work something out with the smell, If there is a solution that will help them without interfering with taking a way with taking away people's jobs.	Noted, thank you for your comment.
19	17/08/2017	Peter Warner	This place has been there since 1958. This place is the future of my family's lively wood. The closing of the factory will affect our lives.	Noted, thank you for your comment.
20	17/08/2017	Dellareese Poggenpoel	This company stand since 1958. Our parents worked here and now we are working here. This company stand 59 years. This is our Future company. I am working at this company for 14 Years; I have two kids who are in grade 9 and grade 1. They have big dreams so if they close the company there will be no future for my 2 children. Oceana is a very good company; they are involved with the community so I don't think closing will be a good idea impact on the community	Noted, thank you for your comment.

			because they know this place as their bread winner of their houses. So I say Oceana Lucky Star must stay, this is our community future and the smell never affected me or anyone else is Hout Bay.	
21	17/08/2017	Dicky Mhlongo	License must be renewed Reason no.1 My family depends on me also my mom and the children on my sister. Reason no.2 Must be renewed because this company must reduce the number on unemployed people and crime is low 100 people for lucky star plus 16 securities will be hopeless, shocked and surprised. Reason no.3 99 years in running in shows a good management in South Africa and good history, how can we close a factory like this Reason no. 4 License must be renewed because it's a future for my kids, mother and father, I put the food on top of the table in Limpopo because of this.	Noted, thank you for your comment.
22	17/08/2017	Morris Fortuin	I am the factory manager at the lobster plant, Atlantic road, Hout Bay. The plant is situated approximately 100m from Lucky Star Fishmeal Operations. We are not negatively affected by the operations of the fishmeal plant. We are therefore in agreement with the issuing of the renewal AEL.	Noted, thank you for your comment.
23	17/08/2017	James Milanzi	On behalf of top security, we request the license of Lucky Star to be renewed due to the number of people who are working there and the community are benefiting in terms of job opportunities. The factory is not harmful to the community.	Noted, thank you for your comment.
24	18/08/2018	Riedwaan Abrahams	Factory is very important for the community of Hout Bay. It provides work and sponsorship to the need.	Noted, thank you for your comment.
25	18/08/2017	Deserona Cloete	I've been staying in Hangberg for the past 40 years. We do not need to lose any more jobs. Other countries are using formalin successfully and all the complaints about the smell is the issue. It does not smell all the time. Nobody I have heard of has had any ill effects.	Noted, thank you for your comment.
26	15/08/17	F Williams	Die reuk het aansienlik verminder asook die rook. Die fabriek skep werk aan inwoners. Skole in die area is afhanklik van donasies wat Oceana voorsien.	Noted, thank you for your comment.
27	15/08/17	Debri –Lee De Jager	Die reuk was soms steurend. Alhoewel die fabriek baie werkseleenthede bied en die gemeenskap finansiële baie ondersteun moet die fabriek nie gesluit word nie.	Noted, thank you for your comment.
28	15/08/17	Thobeka Bomela Imizamo Yethu	That's a big no from my side because it's not fair at all. This is our bread and butter and it's been there since we grew up. They can't just decide to close it down they also think of people's needs first where are we going to work because we've been working for years now so no let the community work to feed their family.	Noted, thank you for your comment.
29	16/08/17	Warren Abrahams	I was born in this house that is one of many closest to Oceana Hout Bay years back. It was worse than today and the emission and smell also. Today it is way better and we can safely say that it is still smell, but not as bad. We know that this is a fishing village first and foremost and people who bought houses recently are the ones who complain the most. The minority don't even live in this area and they should've investigated before purchasing their properties. We call them the "elite few" and if they had it their way, we the aboriginal inhabitants of Hout Bay would have been homeless and without our much needed income to sustain our lives in Hout Bay.	Noted, thank you for your comment.
30	16/08/17	Roscoe Jacobs Secretary Hout Bay Civic Association	Find attached our letter and petition submitted to the City in relation to the Air Emission License for Oceana Groups Hout Bay Fishmeal Factory, WCCT059. Re: Reference Number WCCT059 The Hout Bay Civic Association calls on the City of Cape Town to grant/renew Oceana Groups Hout Bay Fishmeal Factory an Atmospheric Emissions Licence. Failure to grant this licence will impact the Hangberg community negatively. This will leave around a 100 people without work and their families without a bread winner. This excludes the seasonal/contract workers that are also employed. Unemployment in the adjacent Hangberg area is rife and not renewing this licence will increase to the already high unemployment rate. The closure of this factory will also impact the Hout Bay businesses which provide services to the Oceana Group Hout Bay Fishmeal Factory and their employees.	Noted, thank you for your comment.

			We call on the City in granting this Licence to Oceana to also monitor the Air Emissions regularly to ensure that they align to International best practice. Along with our letter we are also resubmitting our petition which we had to the City, Department of Public Works and Oceana Groups in support of granting the Air Emissions Licences.	
31	17/08/17	Shaney van Neel	I know they Oceana factory had a bad smell in the community but I think this is a factory that come a long way here in Hout Bay. People will be workless when Oceana will close and people of the community will not benefit from the factory and children will be hungry and home list when parents will loss these jobs from the factory that must close after all this years.	Noted, thank you for your comment.
32	17/08/17	Carnita van Harten	The factory has been here all these years with the smell why must the Ocean factory close now then a lot of people will be jobless and cannot provide for their families can their not just work out something for the smell and save people jobs.	Noted, thank you for your comment.
33	17/08/17	Trevor Schoeman	No proof of health risk and no to job losses. In favour of renewal.	Noted, thank you for your comment.
34	17/08/17	Atieka Rajap	I am resident in Hout Bay all my life. I can see the work this do in our community. I am in full favour for Oceana to get their licence renewed.	Noted, thank you for your comment.
35	17/08/17	Mogamad Yaghya	I am in favour of the renewal of the AEL licence because they create employment in our community.	Noted, thank you for your comment.
36	17/08/17	Jude Swartbooi	I am a proud employee at Oceana for 20 years. Over the years I have seen the Fishmeal Plant go through many changes and improvements and challenges. Always improvements for the better odour reduction being of the most importance on the list I grew up in community and can contrast that the plant emissions have improved multiple times over. Quite frankly I love this smell that gives Hout Bay its character. It is one of the best companies to work for in the Western Cape. A company that looks for and takes care of its employees. The community it processes if and also the environment it operates in the Company is an asset to the broader community and its surrounding schools. Never hesitating to lend its support when tragedy strikes. All members of my family of five have worked here including mother, father and grandfather.	Noted, thank you for your comment.
37	17/08/17	Patrick Kleinhans	Die rede hoekom die plek moet oop bly is da tons werk vir n familie so hoe kan die plek toe maak/ God het tot hier toe vir ons voorsien en ek glo dat God die mense sal in die hande kry, want die word van God se ons is brood winaars vir ons family. Amen	Noted, thank you for your comment.
38	17/08/17	Rabia Ally	Community depend on factory for employment Factory here long before affluent settlement Fish itself does not smell. It is doing the processing that odours emitted, however this is normal throughout all coastal fishing villages e.g. San Francisco, Bom Bay, Istanbul, Puket etc. I support the issuing of a licence to Oceana Hout Bay Lucky Star.	Noted, thank you for your comment.
39	17/08/17	Imaam Mogamad Shahied Salie	I am in favour of the renewal. There are always jobs in Our community.	Noted, thank you for your comment.
40	17/08/17	Elizabeth Wyngaard	Support it.	Noted, thank you for your comment.
41	17/08/17	Candice Saunders	Yes I am in favour of Oceana Renewal of licence. Oceana provided employment to the community of Hout Bay. Oceana also sponsored the schools and day care centres in Hout Bay. Oceana is part of Hout Bay community.	Noted, thank you for your comment.
42	17/08/17	Chad Leigh Cloete	Yes I am in favour because of the opportunities it gives the people of Hout Bay sustainable jobs and it has been a part of Hout Bay for years.	Noted, thank you for your comment.
43	17/08/17	Samantha Africa	Yes I am in favour of the renewal of Oceana's operation licence because the Company provides employment to people living in the community. Oceana Brands sponsors the school, crèches and different organisations in Hout Bay. Oceana is part of Hout Bay community,	Noted, thank you for your comment.
44	17/08/17	Gerald Cloete t/a Sentinel Coachworks	Yes I am in favour of the renewal of Lucky star's licence. Growing up in Hout Bay Oceana has been part of Hout Bay community for many years. Oceana Brands provides employment, donates to community and to schools and crèches in Hout Bay.	Noted, thank you for your comment.
45	17/08/17	Bronwen Cloete	Oceana helped schools and day cares in Hout Bay. Provide work for people of Hangberg. Operating for many years.	Noted, thank you for your comment.

46	17/08/17	Nadeema Jacobs	I am in favour of the AEL licence because Oceana Brands Hout Bay always support our crèches and churches.	Noted, thank you for your comment.
47	17/08/17	Gadija Salie	I am in favour of the renewal of the AEL licence. This Company is always there for our community specially our schools that benefit transport and the soup kitchen.	Noted, thank you for your comment.
48	17/08/17	Enoch Hlatshwayo	I am Enoch Hlatshwayo have been employed by Oceana Group Lucky Star Division for the past 17 years. The recent application for our new licence (AEL) for continued processing is very important for me. I will continue working and providing for my family and improving the life of my 4 children by taking them to the right school where they will benefit a proper education and continue supporting my parents and my sisters and brother who are not employed yet. With having 9 people depending on my income which Oceana Company is providing to me. It is very important that this licence is renewed and granted as the Company has improved this Plant on the yearly basis. Also this Company very involved within the assisting the community of Hout Bay.	Noted, thank you for your comment.
49	17/08/17	Scales Incorporated	We have a long standing contract with Lucky Star and have 29 employees dependant on the income of our clients.	Noted, thank you for your comment.
50	17/08/17	Hendry Hlongwane	I been here working here for 16 years and at my family, I am bread winner my kids at school so I am willing to see this Company going on operating so even the future generations work in this Company.	Noted, thank you for your comment.
51	17/08/17	Shamiela Bester	I am a worker at Lucky star for 15 years now. I am the sole supporter of two kids. My kids are in grade 7 and 11. I have been working at Lucky Star is to ensure a future for my kids. My kids dreamt of becoming something in life with me sitting at home will definitely not help them to become an graphic designer and engineer.	Noted, thank you for your comment.