

Cleanergy Green Hydrogen Demonstration Plant Environmental Impact Assessment, Walvis Bay, Namibia

Environmental Scoping Report

Authority Ref: **APP-00149**

Report Prepared for

Cleanergy Solutions Namibia (Pty) Ltd

Report Number 585529/Environmental Scoping Report



Report Prepared by

The logo for srk consulting, featuring a stylized orange and grey graphic to the left of the text "srk consulting".

October 2022

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SRK Project Number 585529/Environmental Scoping Report

October 2022

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Executive Summary

Introduction

In 2021, a joint venture was established between the Ohlthaver & List Group of Companies (Namibia's largest privately held group of companies) and CMB.TECH (a Belgian owned company working towards the development of large marine and industrial applications for hydrogen). The joint venture, Cleanergy Solutions Namibia (Pty) Ltd, aims to be the first company in Namibia to produce commercial grade hydrogen from water, utilising renewable energy sources.

Cleanergy Solutions Namibia (Pty) Ltd (henceforth referred to as either the proponent or Cleanergy) appointed SRK Consulting (South Africa) (Pty) Ltd (hereafter referred to as SRK) to facilitate the Environmental Impact Assessment (EIA) process for the proposed pilot site, also referred to as the Green Hydrogen Demonstration Plant (GHDP).

The proposed GHDP will be located outside Walvis Bay on Farm 58 (in the new industrial zone), near the Walvis Bay International Airport and Dune 7 (inland to the Dune), to the East of the new Walvis Bay-Swakopmund highway (D1984). The total size of the area to be developed will be approximately 26 hectares (ha).

Main components of the GHDP will include:

- Five (5) Megawatts-peak (MW_p) solar Photovoltaic (PV) plant, with tracker configuration covering an area of 15 ha;
- Five (5) Megawatt (MW) Polymer Electrolyte Membrane (PEM) electrolyser;
- One (1) hydrogen generation alkaline electrolyser system with a capacity of 100-300 Kilowatt (KW)/2-6 kg/h.
- Compressors to densify the hydrogen gas for storage;
- Buffer tanks and storage tanks (300 bar/500 bar);
- A hydrogen fuelling station; and
- Information centre/building, which will also be used for training and operations.

The following secondary infrastructure will also be required:

- Access road;
- Water connection (pipeline connecting to main NamWater supply); and
- Grid connection (ErongoRed).

It should be noted that the grid connection will also require an Environmental Clearance Certificate (ECC), but that the process will be managed outside the current application due to some minor technical components which still need to be finalised and the fact that responsibility for complying with the requirements of the ECC will fall within the ambit of ErongoRed.

The demonstration project will be started at a 5 MW scale to:

- Evaluate the efficiency of current available technology within the Namibian context;
- Develop the required skills and competencies locally to operate and maintain the demonstration and possible commercial plant, as well as to share the necessary knowledge to allow for the conversion of existing equipment to allow for the utilisation of hydrogen as a fuel; and

- Develop an offtake for the green hydrogen locally (thus providing additional benefit to the country) to ensure multiple markets for the final product e.g., by converting heavy vehicles used in mining and within the port area to dual fuel vehicles.

One of the critical components of the demonstration plant will be the training centre, with course content being developed along with local vocational training and academic institutions, in order to ensure that the long-term staffing needs of the pilot and commercial facilities can be met. Cleanergy thus wants to commence with the construction of the training centre as soon as possible, in order to ensure that the necessary skills and competencies become available.

Motivation for the Proposed Project

Globally, green hydrogen is seen as imperative for the transition to cleaner economies and reducing reliance on fossil fuels, especially within transport industry. Although the transition to green hydrogen production might initially be expensive, it is expected to decrease significantly as the economy of scale is grown along with the market. Additional derivatives from hydrogen production like ammonia, methanol, and e-kerosene, will further aid in the decarbonisation of the heavy transport sector. The final product can either be exported or utilised locally, though for the latter some investment will be required to develop a local market as well.

Namibia has been identified as one of the countries with the greatest potential for large scale, commercial production of green hydrogen. Though some of the technologies to be utilised are new, there is already a well-established solar plant design and construction industry within the country. Therefore, it is anticipated that existing skill sets will be further enhanced with the development of green hydrogen projects, and entirely new job markets will also open up within a country struggling with high unemployment rates and minimal economic diversification. The industry will also substantially contribute to the overall Gross Domestic Product (GDP) for the country.

The final Cleanergy product will be stored as compressed hydrogen compared to liquified hydrogen and liquid organic hydrogen carriers, which requires cryogenic temperatures because the boiling point of hydrogen at one atmosphere pressure is -252.8 °C. Some of the risks associated with green hydrogen production, are storage and transportation including that of fire and explosion hazards. Further, as hydrogen is colourless and odourless, leaks are hard to identify without dedicated leak detectors.

However, when one considers the potential risks associated with the project, against the benefits, there is an overall view that the development of green hydrogen projects within Namibia will be significantly beneficial, and that there is sufficient scope and skills to manage the risks locally.

Alternatives Considered

The project components for which alternatives were considered included:

- Site;
- Type of renewable energy to be utilised;
- Source of water used for hydrogen production; and
- Technology to be utilised for hydrogen production process.

Site alternatives that were considered included a site at Arandis and the proposed site near Walvis Bay. Both sites were suitably zoned for the proposed project. The site at Arandis has greater solar potential, but ultimately the decision was made to focus exclusively on securing the site in Walvis Bay in part to the following reasons:

- Shorter transport distances between the site and harbour (exports and local market opportunities);
- Greater potential for further expansion of production;

- Access to contractors with significant industrial expertise (maintenance and construction);
- Access to multiple distribution routes; and
- Access to large scale supply of water.

Due to the proximity of the preferred site to the airport, it was determined that only solar generation will be utilised at this stage. In order for hydrogen production to be considered “green”, it has to be generated from renewable energy sources, and therefore no other power sources could be considered.

In terms of water supply, the decision was made to utilise water supplied by the municipality with a direct connection to the main water pipelines. Depending on the season, it is anticipated that between 10 m³/day and 14 m³/day of potable water will be required for the overall operation of the proposed Cleanergy GHDP Project. This can comfortably be supplied from existing resources. Desalination is currently not a feasible option due to the distance the water will need to be transferred and the current volumes required.

For the electrolysis of water, the proton exchange membrane process was chosen over the alkaline electrolysis and proton exchange membrane processes because of the availability of containerised solutions, quick response to fluctuations of renewable electricity, the lower importance of the pilot plant purpose, intrinsic hydrogen purity and elimination of a compression stage.

As the project focusses on local usage and long-distance shipment isn't required, the decision was made to store the final product as compressed hydrogen compared to liquified hydrogen and liquid organic hydrogen carriers, which can be shipped over long distances.

The “no-go” option is the alternative of foregoing the implementation of the project entirely. If the project does not proceed, it will imply that no negative environmental impacts will materialise at the proposed footprint area – from this project (though other projects with higher potential impacts can be developed at a later stage by other proponents). However, the overall environmental benefit of using green hydrogen as an energy source globally will be lost, along with potential local socio-economic benefits. Therefore, the no-go option was not considered as a feasible alternative, since none of the impacts identified in the Scoping Phase are currently considered as fatal flaws.

Environmental Impact Assessment Process

Who will Evaluate the Environmental Impact Assessment/Environmental Management Plan?

Before the proposed development can proceed, approval has to be obtained from the Ministry of Environment and Tourism (MEFT). The proposed project triggers listed activities of the Environmental Management Act, 2007 (Act No. 7 of 2007) (EMA) and will require an ECC from the Ministry.

This Scoping Report and Plan of Study (PoS) are submitted to the MEFT, who will then advise the project team as to how the project should proceed for the impact assessment phase of the project.

The impact assessment phase will entail detailed specialist investigations, reporting, and further public participation. Only once a Final Environmental Impact Assessment Report (EIAR) and Environmental Plan (EMP) have been submitted to the MEFT, can a decision be taken whether the project may proceed or not. If the project is approved, an ECC will be issued, and the proponent will be responsible for ensuring compliance to the EMP during construction and operation.

Approach to the Environmental Impact Assessment

The Namibian EIA process consists of two phases, the Scoping, and Impact Assessment Phases. After submitting the application documents to the MEFT, a Draft Scoping Report was compiled and submitted for

public review and comment. Within 14 days of receipt of the application and Final Scoping Report by the Environmental Commissioner, the Scoping Report should be accepted or rejected.

Specialist studies can then commence, and the Draft EIAR and EMP can be compiled. These draft documents also need to be sent out for public review and comment, after which the Final EIAR and EMP is submitted to the MEFT. If the EIA and EMP are accepted, an ECC will be issued. Figure ES - 1 provides an illustration of the EIA process that will be followed.

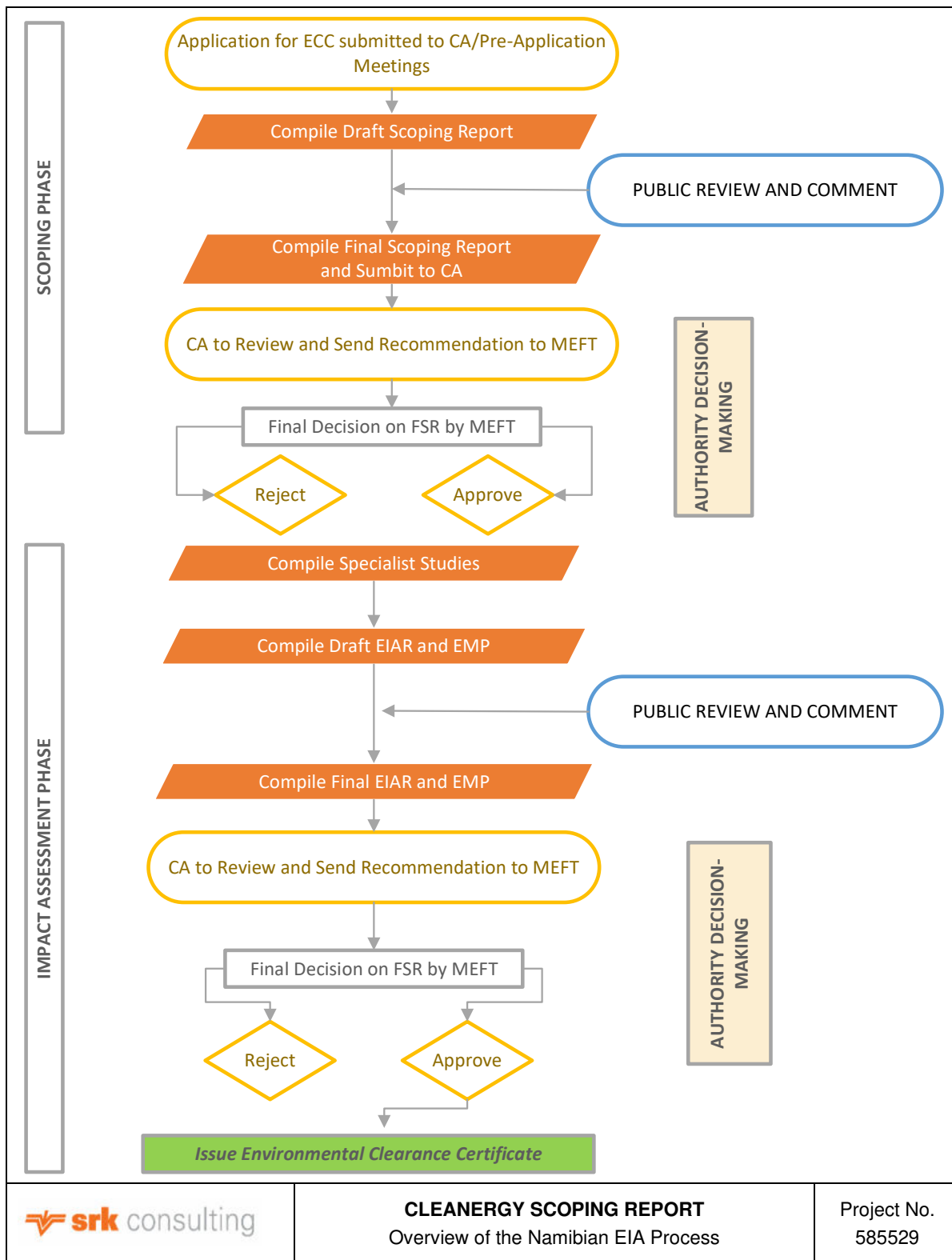


Figure ES - 1: Overview the Namibian Environmental Impact Assessment Process

Public Participation Process

Activities that have thus far been undertaken for the Public Participation Process (PPP) during the Scoping Phase are:

- Development of a stakeholder database:
 - The stakeholder database comprises a variety of stakeholders identified from previous projects in the area, newly identified stakeholders and through the initial registering process of this project.
- The opportunity to participate in the ECC application process and to register as an Interested and Affected Party (I&AP) was announced in July – August 2022 through the following means:
 - Letter of invitations to register and Background Information Documents (BIDs);
 - Media advertisements were placed in The Namib Times (5 August 2022 and 12 August 2022) and The Namibian newspapers (8 August 2022 and 15 August 2022), respectively; and
 - Site notices were erected at several places in and around the proposed study area.
- A pre-application meeting was held with MEFT (17 August 2022), as well as focus group meetings with:
 - The Walvis Bay Municipality (18 August 2022);
 - ErongoRed (18 August 2022); and
 - The Walvis Bay Airport (19 August 2022).
- A public meeting was held in Walvis Bay on 18 August 2022.

Comments received to date have been collated into a Comments and Responses Register (CRR) (Appendix C_10).

The Scoping Report was made available to the public for a 14-day commenting period. All issues, comments and suggestions received from stakeholders were reviewed and collated into a CRR. Comments from stakeholders were incorporated into the Final Scoping Report (This Report) and submitted to the MEFT for decision-making.

Once the MEFT has accepted the Final Scoping Report, the Environmental Assessment Practitioner (EAP) will compile the EIAR and EMP, which will also be made available to the stakeholders for a 14-day review and comment period. Comments received will be incorporated into the Final EIAR and EMP, which will be submitted to the MEFT for decision making. The comments will also be collated into the CRR, which will form an Appendix to the EIAR.

The stakeholders will be notified of MEFT's final decisions on the project once it has been communicated to the EAP and proponent (Cleanergy).

Summary of Issues Raised

Issues that have been raised to date by I&APs and other Stakeholders can be summarised as:

- Requests to be registered as I&AP;
- Source of funding for the project;
- Potable water supply and the impact;
- Collaboration with other companies undertaking similar work in the area;
- Concerns relating to battery storage and connection to ErongoRed;
- Requirements to undertake a Social Impact Assessment;

- Negative Socio-Economic impacts associated with the proposed project;
- Upscaling of the GHDP;
- Cleaning associated with solar panels;
- Price competitiveness when compared to existing technologies;
- Number of people employed on-site;
- Involvement of Small, Medium and Micro Enterprises (SMMEs);
- Proximity of the GHDP to the Walvis Bay Airport and the associated impacts on the airport;
- Proximity of the GHDP to an artillery shooting range and a military base and the associated safety risks associated with green hydrogen storage;
- Potential impacts associated with increased traffic movement in the area;
- Potential impacts on biodiversity and the management thereof;
- Rehabilitation of the site;
- Climate change considerations; and
- Occupational health and safety management.

Profile of the Receiving Environment

Baseline information for this Scoping Report was sourced through desktop analysis and information contained in studies undertaken by the various Namibian governmental departments, environmental non-governmental organisations and other Environmental Specialists.

The Scoping Report provides a general description of the status quo of the receiving environment in the project area. It serves to set the scene and provide context to the area within which the scoping exercise was conducted. This section also includes the main issues/impacts associated with each aspect and how the proposed project will affect the biophysical and social environment. A summary of the main baseline aspects is included in Table ES - 1, with more detail included in Section 5 of the report.

It is noted that the proposed Cleanergy GHDP Project area does not have any major unique habitats, is not in a pristine condition and is heavily impacted by various anthropomorphic activities.

Table ES - 1: Summary of the Profile of the Receiving Environment

Aspect	Description
Socio-Economy	<p>As mentioned previously, the proposed GHDP will be located outside Walvis Bay in the new industrial zone, near the Walvis Bay International Airport and Dune 7 (inland to the Dune), to the East of the new Walvis Bay-Swakopmund highway (D1984). The Narraville Community is the closest community to the proposed GHDP Project, with a line of site distance of almost 6 km. No unique habitats occur on site and the project area is heavily impacted by various anthropomorphic activities.</p> <p>Walvis Bay is in the Erongo Region of Namibia and is the largest town in the region, with a population of 62 000 in 2011 (NSA, 2014). The town is Namibia’s main industrial harbour town with an efficient international port and is becoming a growing logistics hub for other Southern African Development Community (SADC) countries. It is also the base to a large fishing industry.</p> <p>The Erongo Region has a relatively young population, with a median age of 26 years, and over 68% of the urban population are people of working age (between 15 and 59 years) (NSA, 2014). The most common home languages spoken in the region are Oshiwambo, spoken by 38.8% of the population. Afrikaans is spoken as a home language by 20.4% of the population, Nama/Damara by 18.8%, English by 5.3% and German by 2.8% (NSA, 2014).</p> <p>One of the key concerns raised during the public participation and stakeholder engagement, was the possible impact of this project on the socio-economic environment. It was noted that</p>

Aspect	Description
	<p>past projects promised a lot but delivered little and care must therefore be taken to ensure that the project provides benefits to the community. In line with this a consultant was identified, to assist the proponent with ensuring that the impacts of, especially the construction phase, can be adequately managed. Due to the importance placed on this item by the proponent, it was decided to allow the consultant to define the baseline of the socio-economic component outside the formal EIA process and then to proactively work with the proponent and contractors to developed sensible mitigation controls prior to the start of construction. Therefore, the socio-economic study will not be part of the formal EIA process but will be executed as part of the EMP in order to make it more proactive.</p>
Biodiversity	<p>According to Cunningham (2022), the central coastal region, and the Swakopmund/Walvis Bay area in particular, is regarded as “relatively low” in overall (all terrestrial species) diversity while the overall terrestrial endemism in the area on the other hand is moderate to high.</p> <p>It is estimated that at least 54 reptile, 7 amphibian, 43 mammal, 185 bird species (breeding residents), 39 species of larger trees and shrubs and up to 48 grasses are known to or expected to occur in the general/immediate Walvis Bay area of which a high proportion are endemics (e.g., reptiles with 53.7%) (Cunningham, 2022).</p> <p>The GHDP area does not have any major unique habitats; is not in a pristine condition and is heavily impacted by various anthropomorphic activities. However, the gravel plains east of the mobile dune belt are classified as a ‘biodiversity yellow flag’ area due to:</p> <ul style="list-style-type: none"> • areas with high levels of endemism and diversity; • conservation status of species; • the extent to which habitats are threatened or vulnerable to disturbance; and • habitats or migration routes which are critical for species’ survival. <p>Provision has been made for the practical impacts of the proposed Cleanergy GHDP Project on biodiversity to be assessed as part of the EIA Phase of the project.</p>
Surface Water	<p>The area is bordered by the Kuiseb River to the south (Walvis Bay area) and the Swakop River to the north (Swakopmund area) with catchment areas of 15,500 km² and 30,100 km², respectively (Cunningham, 2022).</p> <p>Two important coastal wetlands – i.e., Walvis Bay Wetlands and Sandwich Harbour – both Ramsar sites, occur in the area (Cunningham, 2022). The entire coast and the Walvis Bay lagoon as a coastal wetland, are viewed as sites with special ecological importance in Namibia. The known distinctive values along the coastline are its biotic richness (arachnids, birds and lichens) with the Walvis Bay lagoon’s importance being its biotic richness and migrant shorebirds as well as being the most important Ramsar site in Namibia.</p> <p>The gravel plains east of the dune belt are viewed as a biodiversity “Yellow Flag Area” due to lichens and biodiversity associated with the Tumas drainage area – i.e., Tumas ‘mouth’ (reedbed and ephemeral spring on eastern edge of dunes) – hummocks and ephemeral wetland (Cunningham, 2022). Other important areas in the general vicinity include the biodiversity “Red Flag Areas” such as the coast immediately north of Walvis Bay (important bird area; high density of waders along beach and Damara tern breeding area); Kuiseb River (Linear oasis, riparian woodland, aquifer recharge, rich wildlife.) and Swakop River (Linear oasis, riparian woodland, aquifer recharge, rich wildlife, bird light paths) (Cunningham, 2022).</p> <p>The proposed development area falls adjacent the recently proclaimed Dorob National Park. No communal and freehold conservancies are located in the general area with the closest communal conservancy being the Gaingu Conservancy in the Spitzkoppe area approximately 100 km to the northeast (Cunningham, 2022).</p> <p>A well vegetated hummock system in one of the ephemeral Tumas River drainage lines further to the north of the GHDP area. Such a well-developed hummock system is viewed as unique and can be compared to the sparsely vegetated drainage line in the GHDP area.</p> <p>Provision has been made for the practical impacts of the proposed Cleanergy GHDP Project on surface water resources to be further assessed.</p>
Geohydrology	<p>A productive porous aquifer is located within close proximity of the project site. During a site visit undertaken to the Project Site on 17 August 2022, it was evident that construction activities in the area “exposes” groundwater where the top layer of the sand is removed. Water was found ponding on surface in several of the areas in the surrounding areas. Further studies will be required in order to determine the significance of this phenomenon on the project. As such a Geohydrological Impact Assessment will be undertaken.</p>
Visual	<p>The area where the project is proposed is still fairly undeveloped and consists of mostly natural environments aside from the nearby roads and Walvis Bay International Airport.</p> <p>The Airport is a sensitive receptor and care must be taken to ensure that the project does not pose any undue risk to the Airport. Further, Dune 7 is a popular tourist destination, but is not</p>

Aspect	Description
	<p>frequented often by residents of the area. Thus, there will be minimal disruption to the sense of place for local populations, but there may be a negative perception from tourists once the entire industrial area is developed. This project, however, has minimal disruptive or highly industrial visual components.</p> <p>A Visual Impact Assessment will be undertaken to assess the practical impacts of the proposed Cleanergy GHDP Project and to develop appropriate environmental management measures to reduce the impact thereof.</p>
Climate	<p>The Erongo Region, located in the western part of Namibia, falls within the west coast arid zone of southern Africa, and is characterised by low rainfall, extreme temperatures and unique climatic factors influencing the natural environment and biodiversity. Episodic dust storms, associated with easterly wind conditions, are common during austral autumn and winter months. During these events, dust is transported westwards over long distances across the Namibian continent towards the Atlantic Ocean (Liebenberg-Enslin et al., 2017). This descend of air leads to a drop in air pressure as a result of vertical air column expansion, and the development of warm berg-wind conditions as a result of adiabatic heating. Although strong, hot and often uncomfortable for people, easterly wind conditions are usually relatively short lived (Liebenberg-Enslin et al., 2017).</p> <p>Although temperatures vary throughout the year, the average annual temperature for the general area is 16-18°C with the average maximum and minimum temperatures varying between 22-24°C and 10-12°C, respectively. Frost is uncommon in this area. The relative humidity between the least and most humid months varies between 50-60% and >90%, respectively with the average annual rainfall being between <50mm. Variation in annual rainfall is however quite high with >100%.</p> <p>The relative humidity is high, ranging from a high of 81% in January and March to a low of 65% to 71% in May, June, July, and December.</p> <p>Rainfall is more-or-less evenly spread from July to December. The average amount of rainfall is slightly higher in January and from April to June and peaks in March at 4.4 mm.</p>
Topography	<p>The gradient of the Central Namib is gradual at 1% in elevation from the coast to the escarpment foot. There are no major landscape features aside from a few river valleys, inselbergs, and dunes influencing the climate between the escarpment and the ocean. This allows the steady development of gradients impacting temperature, humidity, fog, and wind patterns. The isohyets mostly run parallel to the coast; however, some gradients are in opposite directions, changing the climatic characteristics from the coast inland. The Central Namib was thus divided in several zones namely the Pro-Namib, eastern zone, middle zone, foggy interior zone, and cool foggy coastal zone which are analysed by vegetation, land use, and soil processes.</p> <p>The terrain is overall very flat aside from Dune 7 located on the proposed site's western side and some smaller sand dunes. The site is between 30 and 50 m above sea level.</p>
Geography and Geology	<p>The dominant geology in the general area is associated with the Kalahari and Namib Sands (Kalahari Group) – i.e., relatively young at 0-70 million years. Mineral deposits in the area include uranium (Cunningham, 2022).</p>
Soils, land use, and land capability	<p>The dominant soils present at the Cleanergy GHDP Project area are described as petric gypsisols – i.e., soils with a solid layer at a shallow depth that remains hard even when wet with an accumulation of calcium sulphate restricted to the very dry areas of the Namib. These soils are typically low in fertility with only the hardiest plants able to survive in them (Cunningham, 2022).</p> <p>The proposed project area is located within an area zoned as Heavy Industrial Area.</p> <p>The proposed Cleanergy GHDP Project area does not have any major unique habitats, is not in a pristine condition and is heavily impacted by various anthropomorphic activities.</p>
Heritage/Archaeology	<p>Due to relative homogeneity of the site's topography and its geomorphology, no traces of significant archaeological and historical evidence relevant under the provisions of the National Heritage Act (Act No. 27 of 2004) were found (RCHS, 2022).</p>
Air Quality	<p>In general, the air quality in Walvis Bay is of good quality according to the Air Quality Index (AQI) and its main pollutant, PM_{2.5} concentration meets the World Health Organisation (WHO) annual air quality guideline value of 2.1 µg/m³. Surrounding areas in the proposed project area include roads and an airport which adds to the reduction of air quality, however, there are few other developments in the nearby area.</p> <p>The proposed Cleanergy GHDP Project may potentially result in nuisance dust during the construction phase of the project. The impacts of these emissions are expected to be low on the surrounding areas due to the status quo in the area. Provision has been made for the practical impacts of the proposed Cleanergy GHDP Project to be assessed during the EIA</p>

Aspect	Description
	phase of the project but since the impact is expected to be limited, no specific air specialist study is envisaged.
Noise	Current sources of noise on the surrounding area include highways and the Walvis Bay International Airport. The construction and operation of the proposed Cleanergy GHDP is not expected to generate material noise nuisance. Provision is made for the practical impacts of the proposed project to be further considered during the impact assessment phase of the EIA, although, since the impact is expected to be limited, no specific noise specialist study is envisaged.
Areas of conservation concern	<p>As mentioned previously, the proposed development area falls adjacent the recently proclaimed Dorob National Park. No communal and freehold conservancies are located in the general area with the closest communal conservancy being the Gaingu Conservancy in the Spitzkoppe area approximately 100 km to the northeast (Cunningham, 2022).</p> <p>An eroded granite riverbank, which forms part of the of the ephemeral Tumas River drainage lines, on the eastern side of the GHDP area is viewed as the most important habitat in the general GHDP area. It serves as habitat to a variety of vertebrate fauna – e.g., near threatened brown hyena (<i>Parahyaena (Hyaena) brunnea</i>) resting site and the diurnal and endemic Namib day gecko (<i>Phelsuma [Rhopropus] afer</i>). Although this habitat is not exclusively associated with the GHDP area, nor particularly unique, it nevertheless is viewed as the most important habitat in the general proposed GHDP area.</p> <p>A well vegetated hummock system in one of the ephemeral Tumas River drainage lines further to the north of the GHDP area. Such a well-developed hummock system is viewed as unique and can be compared to the sparsely vegetated drainage line in the GHDP area.</p> <p>An example of a dolerite ridge, further to the north of the GHDP area, is viewed as unique habitat to a variety of flora and vertebrate fauna.</p> <p>It is however noted that no areas of conservation concern are directly associated with the proposed Cleanergy GHDP Project footprint area.</p>

Anticipated Impacts

The Scoping Phase aims to identify the potential positive and negative biophysical, socio-economic, and cultural impacts of the proposed project. Given the proposed activities associated with the proposed Cleanergy GHDP and the sensitivities of the affected environment, several environmental and social impacts of potential significance have been identified by the project team are summarised in Table ES-2.

Potential impacts of relevance, including cumulative impacts, in terms of Construction, Operation, and Decommissioning Phases of the proposed Cleanergy GHDP Project will be further assessed during the Impact Assessment Phase of the EIA process, with inputs obtained from specialist studies. Mitigation and management measures of significant impacts will be incorporated into the EMP.

The EAP team and specialists will identify significant past and present projects and activities that may interact with the project to produce cumulative impacts during the impact assessment phase of the process. The EAP team and specialists will include mitigation and management measures in the EMP that Cleanergy will be required to implement to, where possible, avoid the negative impact and/or minimise the significance of the impacts.

Although this project will be a first for Namibia, the potential impacts associated with the Cleanergy GHDP Project are well known due to the nature of the activities that will be executed.

Table ES - 2: Anticipated Impacts

Element of Environment	Potential Impact Descriptions
Socio-Economic	<p>Positive (+):</p> <ul style="list-style-type: none"> • Potential positive impact on livelihoods/increase in temporary employment opportunities during the <i>Construction Phase</i>; • Positive Socio-Economic Impact as a result of skills development in the Green Energy Field (<i>Operational Phase</i>); • The positive impact resulting from the <i>Construction and Operation</i> of the proposed Cleanergy GHDP relates to the hydrogen production experience gained within Namibia, the demonstration of the potential successful commercialisation of hydrogen within Namibia and the training of local employees with the conversion of renewable electricity energy into green molecules like hydrogen and the successful demonstration; and • <i>Construction and the Operation</i> of the Cleanergy GHDP will not only provide employment opportunities but the sale of hydrogen will also contribute to the Namibian economy (albeit small as this is only a demonstration plant). Considerable economic investment will also be made during the design and construction phases of the project. <p>Negative (-):</p> <ul style="list-style-type: none"> • Potential negative impact on Sense of Place due to the permanent alteration of the current landscape (<i>Operational Phase</i>); • Influx of job seekers during the <i>Construction Phase</i>, may have a negative social impact as a result of increased social pathologies and increase petty crimes due to potential squatting; and • Health and safety risks may arise during especially the <i>Construction Phase</i>, as a result of workers lighting fires on site, littering and lack of housekeeping.
Air Quality	<p>Negative (-):</p> <ul style="list-style-type: none"> • Potential deterioration of air quality due to the generation and dispersion of dust caused by activities undertaken during the <i>Construction Phase</i> of the project.
Noise	<p>Negative (-):</p> <ul style="list-style-type: none"> • Potential increase in ambient noise levels (in the immediate vicinity of the project) during the <i>Construction Phase</i>, as a result of vehicles and machinery.
Heritage and Archaeological Resources	<p>Negative (-):</p> <ul style="list-style-type: none"> • Potential destruction or loss of cultural artefacts and/or sites of archaeological importance as a result of the <i>Construction Phase</i> of the project.
Visual/Landscape	<p>Negative (-):</p> <ul style="list-style-type: none"> • Indirect visual impact due to dust generation as a result of the movement of vehicles and materials, to and from the site area during the <i>Construction Phase</i> of the project; • Potential deterioration of the visual quality and sense of place of the site during the <i>Construction and Operational Phases</i> of the proposed GHDP, specifically as a result of the solar arrays; and • Glint and glare from the solar array during the <i>Operational Phase</i> of the project may further impact on aeronautical, particularly flights on approach and departure from the Walvis Bay Airport.
Biodiversity – Fauna and Flora	<p>Negative (-):</p> <ul style="list-style-type: none"> • Physical terrestrial habitat disturbance, alteration and loss of vertebrate fauna and flora habitat during the <i>Construction Phase</i> of the project; • Restriction of animal movement and entrapment during the <i>Operational Phase</i> of the project including: <ul style="list-style-type: none"> ○ Disruption of brown hyena movement patterns; ○ Pipeline trench act as pitfall trap; and ○ Aboveground pipeline acting as a barrier to ungulates and ostrich; • Establishment and spread of alien invasive plants during the <i>Construction and Operational Phases</i> of the project; and • Solar plant potentially disrupting avifauna during the <i>Operational Phase</i> of the project.

Element of Environment	Potential Impact Descriptions
Surface water	<p>Negative (-):</p> <ul style="list-style-type: none"> • The physical disturbance and destruction of dry and ephemeral water courses and drainage lines during the <i>Construction Phase</i> of the project; and • Possible deterioration of water resources as result of accidental spillages of hazardous substances from construction vehicles/machinery, as well as from hazardous materials storage areas during the <i>Construction Phase</i> of the project
Groundwater	<p>Negative (-):</p> <ul style="list-style-type: none"> • Possible deterioration of groundwater as a result of accidental spillages of hazardous substances from construction vehicles/machinery, as well as from hazardous materials storage areas during the <i>Construction Phase</i> of the project; and • Changes to geohydrological regime as a result of the <i>Construction and Operational Phases</i> of the project.
Soils	<p>Negative (-):</p> <ul style="list-style-type: none"> • Physical damage and destruction of soil crusts and soil horizons during the <i>Construction Phase</i> of the project; and • Possible deterioration of soils as a result of accidental spillages of hazardous substances from construction vehicles/machinery, as well as from hazardous materials storage areas during the <i>Construction Phase</i> of the project.
Climate Change	<p>Negative (-):</p> <ul style="list-style-type: none"> • During the <i>Construction Phase</i>, the movement of vehicles and earth moving machinery may result in the production of carbon dioxide (Green House Gas), which may have an impact on the climate in the area. <p>Positive (+):</p> <ul style="list-style-type: none"> • Positive climate change adaption as a result of the development of green hydrogen projects during the <i>Operational Phase</i> of the project.
Waste storage, handling and disposal	<p>Negative (-):</p> <ul style="list-style-type: none"> • Inappropriate storage, handling and disposal of waste during the <i>Construction and Operational Phases</i> of the project may lead to impacts on surface water, groundwater and soils; and • Inappropriate storage, handling and disposal of waste during the <i>Construction and Operational Phases</i> of the project may attract scavenging animals to the area which poses a safety risk to the Walvis Bay Airport.
Cumulative Impact	<p>Negative (-):</p> <p>The following potential preliminary cumulative impacts have been identified based on the project description and past studies:</p> <ul style="list-style-type: none"> • Positive Socio-Economic impacts as a result of temporary employment, skills development in the Green Energy Field etc.; • Clearance of soil crust and soil horizons and potential loss of habitat due to the development of the proposed Cleanergy GHDP Project; • Soil erosion due to cleared areas within an area already previously disturbed; • Emissions due to construction and operational equipment and machinery, adding to overall ambient air quality impact; • Increased influx of job seekers to the general area as a result of the construction activities of the Cleanergy GHDP Project; and • The construction period may cause traffic-related impacts on the local road network.

Specialist Studies

The following site-specific specialist studies will be undertaken during the impact assessment phase to address the impacts of significant relevance:

- Biodiversity Impact Assessment;
- Heritage and Archaeology Impact Assessment;
- Visual Impact Assessment;
- Surface Impact Assessment;
- Geohydrological Impact Assessment; and
- Socio-Economic Impact Assessment¹.

Certain impacts that are anticipated to be of limited or lower significance, either by virtue of the scale of the impacts, their short duration (e.g., Construction Phase only), disturbed nature of the receiving environment and/or distance to communities, will be assessed by EAP Team and reported directly into the EIAR.

Quantification of Impacts

The anticipated impacts associated with the proposed project will be assessed according to SRK's standardised impact assessment methodology which is presented Section 8.5.1. This methodology has been utilised for the assessment of environmental impacts where the consequence (severity of impact, spatial scope of impact and duration of impact) and likelihood (frequency of activity and frequency of impact) have been considered in parallel to provide an impact rating and hence an interpretation in terms of the level of environmental management required for each impact.

Plan of Study for the Environmental Impact Assessment

The Scoping Report is concluded with a Plan of Study (PoS) for the EIA which explains how the EIA will be conducted for the project in accordance with the following:

- Key environmental issues identified during the scoping phase to be investigated further in the EIA Phase;
- Feasible alternatives to be assessed further in the EIA Phase;
- Development of an EMP;
- Specialist investigations which need to be finalised;
- The public participation process to be followed;
- Method of assessing environmental and social issues and alternatives; and
- Consultation with the authorities.

¹ Due to the importance placed on this item by the proponent, it was decided to allow the consultant to define the baseline of the socio-economic component outside the formal EIA process and then to proactively work with the proponent and contractors to develop sensible mitigation controls prior to the start of construction. Therefore, the socio-economic study will not be part of the formal EIA process but will be executed as part of the EMP in order to make it more proactive.

Way Forward

- The Scoping Report was distributed for a 14-day commenting period;
- Comments received from I&APs were collated and responded to in an updated CRR included in the Final Scoping Report (This Report);
- Where required, the Scoping Report was edited and updated to address I&AP comments;
- The Final Scoping Report and CRR are submitted to MEFT for a decision on the Scoping Phase of the EIA process, including the ToR in the Scoping Report;
- Following the approval of the Scoping Report, the Impact Assessment Phase of the project will commence.

Conclusion

Anticipated environmental, social, and cultural impacts have been identified. Extensive consideration has been given to the proposed location and design of the project and no fatal flaws have been identified during Scoping Phase.

Required specialist studies that will be conducted include a Surface/Groundwater Impact Assessment, a Heritage and Archaeology assessment, a Visual Impact Assessment, and a Biodiversity Impact Assessment. Due to the importance placed on the Socio-Economic component of the project, it was decided to allow the consultant to define the baseline of the socio-economic component outside the formal EIA process and then to proactively work with the proponent and contractors to develop sensible mitigation controls prior to the start of construction. Therefore, the socio-economic study will not be part of the formal EIA process but will be executed as part of the EMP in order to make it more proactive.

Table of Contents

Executive Summary	ii
Disclaimer.....	xxiv
List of Abbreviations.....	xxv
1 Introduction and Background to Proposed Project	1
1.1 Environmental Impact Assessment Process Summary	2
1.2 Opportunity to Comment.....	4
2 Environmental Impact Assessment Approach and Methodology	6
2.1 Environmental Impact Assessment Project Team	6
2.2 Environmental Impact Assessment Process	7
2.2.1 Project Initiation Phase.....	8
2.2.2 Scoping Phase	8
Objectives of the Scoping Phase	8
Compilation of the Scoping Report	9
Compilation of the Final Scoping Report	10
2.2.3 Environmental Impact Assessment Phase.....	10
Environmental Management Plan.....	11
Submission of Environmental Impact Assessment Report and Environmental Management Plan for Review.....	11
Authority Consultation	11
Alternatives	11
Specialist Studies.....	11
2.2.4 Public Participation Process.....	12
Approach to Public Participation	13
Summary of Issues Raised	18
3 Environmental Policy Planning and Legal Framework	19
3.1 Namibian Institutional and Administrative Structure	19
3.1.1 Ministry of Environment, Forestry and Tourism	19
3.1.2 Ministry of Mines and Energy	19
3.1.3 Ministry of Agriculture, Water and Land Reform	20
3.1.4 Ministry of Fisheries and Marine Resources	20
3.1.5 Namibia Power Corporation and Regional Electricity Distributors	20
3.1.6 Namibian Water Corporation.....	20
3.2 Namibian Legislation.....	21
3.2.1 EMA Listed Activities and Description.....	28
3.2.2 Other Key Relevant Namibian Policies	28
3.2.3 International Conventions.....	30
3.2.4 International Finance Corporation Performance Standards.....	31
4 Description of Proposed Project.....	35

4.1	Proponent.....	35
4.2	Project Overview	35
4.3	Project Location	37
4.4	Schedule and Life of Project	40
4.5	Project Components.....	40
4.5.1	Solar Photovoltaic Plant	40
	Bifacial PV Modules	40
	Inverters	41
	Photovoltaic Tracking System.....	42
	Summary of Components Data.....	42
	Battery Energy Storage System (BESS)	43
4.5.2	Green Hydrogen Demonstration Plant.....	45
	Hydrogen System.....	45
	Electrolyser	45
	Compressor.....	46
	Storage.....	48
	Hydrogen Refuelling Station	48
	Effluents/Emissions from the GHDP Electrolyser	49
4.5.3	Training Centre.....	50
4.5.4	Access Road	52
4.5.5	Potable Water Pipeline Connection	55
4.5.6	Electrical Transmission	55
4.6	Project Activities.....	55
4.6.1	Site Preparation Phase	55
4.6.2	Construction Phase	55
4.6.3	Operational Phase.....	56
4.6.4	Decommissioning Phase.....	57
5	Description of the Baseline Environment	58
5.1	Socio – Economic Environment	58
5.2	Biodiversity	59
5.2.1	Habitat	59
5.2.2	Vegetation	59
5.2.3	General.....	60
5.2.4	Description of Affected Environment.....	63
	Vertebrate Fauna	63
	Reptile Diversity	63
	Amphibian Diversity	77
	Mammal Diversity.....	78
	Bird Diversity	83
	Tree and Shrub Diversity	90
	Grass Diversity.....	96

Southern Namib	96
Other Species Diversity	99
<i>Aloe spp.</i>	99
<i>Commiphora spp.</i>	100
<i>Euphorbia spp.</i>	100
<i>Ferns</i>	100
<i>Lichen spp.</i>	100
<i>Lithop spp.</i>	101
<i>Other</i>	101
Important Species	101
Reptiles	101
Amphibians	102
Mammals.....	102
Birds	102
Trees/Shrubs.....	102
Grasses.....	103
Other species	103
Important areas	103
Inland Gravel Plains [biodiversity yellow flag area].....	103
Other important non-marine areas in the immediate vicinity:	108
Coast immediately north of Walvis Bay [biodiversity red flag area]	108
Swakop River [biodiversity red flag area].....	108
Kuiseb River Delta [biodiversity red flag area]	108
!Nara Fields [biodiversity red flag area]	108
5.3 Heritage and Cultural Aspects	108
5.3.1 Fieldwork	111
5.3.2 Literature Review	115
5.3.3 Data Analysis & Results	118
5.4 Surface Water	124
5.5 Geohydrology	126
5.6 Topography	126
5.7 Visual	128
5.7.1 Visual Character.....	128
5.7.2 Visual Absorption Capacity	133
5.7.3 Visual Implications.....	133
5.7.4 Glint and Glare of the Proposed Photovoltaic Panels.....	136
5.8 Climate	137
5.8.1 Temperature.....	137
5.8.2 Humidity.....	138
5.8.3 Rainfall.....	139
5.9 Soils	140

5.10	Land Uses	142
5.10.1	Current Land Uses	142
5.10.2	Other Notable Land Uses	145
5.10.3	Planned Future Land Uses.....	145
5.10.4	Infrastructure	145
5.11	Geography	147
5.12	Geology	147
5.13	Air Quality.....	149
5.14	Noise	149
5.15	Areas of Conservation Concern.....	149
6	Alternatives.....	151
6.1	Site Alternatives	151
6.2	Technical Alternatives	151
6.2.1	Hydrogen Production.....	151
6.2.2	Water Provisioning	152
6.2.3	Water Electrolysis.....	152
6.2.4	Utilisation of Hydrogen	152
6.3	No-Go Option	153
7	Anticipated Environmental, Social, and Cultural Impacts	154
7.1	Cumulative Impacts.....	160
8	Plan of Study for the Environmental Impact Assessment Phase of the EIA Process	161
8.1	Purpose of this Plan of Study.....	161
8.2	Purpose of the Environmental Impact Assessment and Environmental Management Plan	161
8.3	Planned Task Description for the Environmental Impact Assessment Process	162
8.4	Specialist Study Terms of Reference.....	163
8.4.1	Generic Terms of Reference for Specialist Studies	164
8.4.2	Specialist Specific Terms of Reference	165
	Terrestrial Biodiversity and Ecology.....	165
	Heritage including Archaeology, Landscape Setting and Palaeontology	166
	Visual	167
	Surface Water and Geohydrology.....	167
	Socio-Economic	168
8.5	Proposed Method for Assessing Environmental and Social Issues and Alternatives	170
8.5.1	Impact Assessment Methodology	170
	Impact Identification	170
	Impact Assessment Methodology	170
8.6	Environmental Impact Assessment Report and Environmental Management Plan	173
8.6.1	Environmental Impact Assessment Report	173
8.6.2	Environmental Management Plan	173
8.7	Alternatives	173

8.8	Public Participation Process Going Forward (Environmental Impact Assessment Phase)	173
8.8.1	Submission of Environmental Impact Assessment Report and Environmental Management Plan for Review	173
8.8.2	Authority Consultation	174
8.8.3	Consultation Post Decision	175
8.9	Grievance Mechanism	175
9	Assumptions and Limitations	176
10	Undertaking of Oath by the EAP	177
11	Conclusions and Recommendations.....	178
12	References	180
	Appendices	191
	Appendix A: Curriculum Vitae of the Project Team and Projects.....	192
	Appendix B: MEFT Application Form.....	193
	Appendix C: Public Participation Process	194
	Appendix C_ 1: Stakeholder Database	195
	Appendix C_ 2: Project Announcement Notifications	196
	Appendix C_ 3: Background Information Document.....	197
	Appendix C_ 4: Newspaper Advert	198
	Appendix C_ 5: Site Notices	199
	Appendix C_ 6: Facebook Post	200
	Appendix C_ 7: MEFT Meeting	201
	Appendix C_ 8: Focus Group Meetings	202
	Appendix C_ 9: Public Meeting	203
	Appendix C_ 10: Comments and Responses Register.....	204
	Appendix C_ 11: Stakeholder Communications	205
	Appendix C_ 12: Competent and Commenting Authority Correspondence.....	206
	Appendix C_ 13: Distribution of Scoping Report.....	207
	Appendix C_ 14: Transmittal Notes of Scoping Report Distribution.....	208

List of Tables

Table 2-1:	EAP Contact Details.....	6
Table 2-2:	Requirements of Regulation 8 of GNR 30	9
Table 2-3:	Public Participation Plan for the Proposed Cleanergy GHDP.....	15
Table 3-1	Policy and Legislative Context of Proposed Project	22
Table 3-2:	Detailed Description of the Proposed Listed Activities	28
Table 3-3:	Summary of International Finance Corporation Performance Standards and how they will be addressed	32
Table 4-1:	Proponent Contact Details	35
Table 4-2:	List of Affected Properties and Property Portions.....	37
Table 4-3:	GHDP PV Plant Technical Specifications	42
Table 4-4:	PEM Electrolyser Specifications	46
Table 4-5:	Fuelling Base Case	49
Table 5-1:	Reptile Diversity Known and/or Expected to Occur in the General GHDP Project Area – Literature Study.....	65
Table 5-2:	Reptiles Recorded on the Gravel Plains at Gobabeb (Henschel et al., 2006).....	68
Table 5-3:	Reptiles Reported and/or Expected to Occur in the General Valencia Area (Griffin & Coetzee, 2005)	69
Table 5-4:	Reptiles Recorded in the General Trekkopje Uranium Mining Area (Cunningham, 2006b)	71
Table 5-5:	Reptiles recorded in the general Valencia area (Cunningham, 2007)	72
Table 5-6:	Reptiles Recorded in the General INCA and TRS Areas (Cunningham, 2010)	73
Table 5-7:	Reptiles Recorded in the General Khan River Area (Cunningham, 2011)	73
Table 5-8:	Reptiles recorded in the general Marenica (Spitzkoppe) area (Henschel et al., 2011)	74
Table 5-9:	Reptiles Recorded in the General Ongolo and Tumas Areas (Cunningham, 2013)	75
Table 5-10:	Reptiles Recorded in the General Rössing Uranium Mine Area (Kavari, 2007).....	76
Table 5-11:	Reptiles Recorded in the General Kuiseb River Delta Area, (Cunningham, 2019)	76
Table 5-12:	Reptiles Recorded in the General Tumas Area (Cunningham, 2020)	76
Table 5-13:	Amphibian Diversity Known and/or Expected to Occur in the General GHDP Project Area – Literature Study.....	78
Table 5-14:	Mammal Diversity Expected to Occur in the General GHDP Area – Literature Study	80
Table 5-15:	Avian Diversity Expected to Occur in the General GHDP Area – Literature Study	84
Table 5-16:	Tree and Shrub Diversity Expected (Literature Study) and Confirmed (√ - fieldwork) in the Proposed GHDP Area.....	92
Table 5-17:	Important Species – i.e., Red Data spp. – Known to Occur in the General Swakopmund/Walvis Bay (inland) Area according to Loots (2005)	94
Table 5-18:	Grass Diversity Expected (Literature Study) and Confirmed (√ - fieldwork) to Occur in the General GHDP Area	97
Table 7-1:	Summary of Potential Environmental Impacts Associated with the Proposed Development..	155
Table 8-1:	Key Environmental Assessment Practitioner Tasks and Indicative Time Frames associated with the Environmental Impact Assessment Phase	162
Table 8-2:	Summary of Specialist Studies and Relevant Project Components	163
Table 8-3:	Criteria used to determine the Consequence of the Impact	171
Table 8-4:	Method used to determine the Consequence Score	171

Table 8-5:	Probability Classification	171
Table 8-6:	Impact significance ratings	172
Table 8-7:	Impact Status and Confidence Classification.....	172

List of Figures

Figure 1-1: Overview the Namibian Environmental Impact Assessment Process	4
Figure 4-1: Project Illustration.....	36
Figure 4-2: Project Location	38
Figure 4-3: Relevant Properties.....	39
Figure 4-4: Scheme of functionality of bifacial PV modules and example for monocrystalline PV modules of Canadian Solar	41
Figure 4-5: Decentralised 215 kW Inverter from Huawei	41
Figure 4-6: Example for Bifacial Horizontal Tracking System	42
Figure 4-7: Sample Layout MTU EnergyPack QL	44
Figure 4-8: Key Componentry of the 5 MW GHDP	45
Figure 4-9: Electrochemical Reaction of Water Electrolysis (Kumar & Himabindu, 2019).....	46
Figure 4-10: Diaphragm Compressor (Li, et al., 2019).....	47
Figure 4-11: Piston Compressor (Hofer, n.d.)	48
Figure 4-12: Illustration of the Hydrogen Refuelling Station.....	49
Figure 4-13: Training Centre	51
Figure 4-14: Dune 7 Interchange and Service Road.....	53
Figure 4-15: Proposed Site Entrance Road	54
Figure 5-1: Biomes and Vegetation Types in Namibia with the GHDP Area Shown as Red Star (Mendelsohn et al. 2002)	62
Figure 5-2: <i>Salsola Nollothensis</i> (Saltbush) Shrubs are the Most Numerous Plants in the GHDP Area.....	94
Figure 5-3: The Endemic <i>Arthroa Leubnitziae</i> (Pencil Bush) Occurs in the GHDP Area although at Low Densities	95
Figure 5-4: The Endemic <i>Zygophyllum Stapfii</i> (Dollar Bush) Occurs in the GHDP Albeit as Individual Plants Only	95
Figure 5-5: <i>Salsola Nollothensis</i> (Saltbush) Hummocks forming along the Ephemeral Drainage Line	96
Figure 5-6: The Barren Sandy Gravel Gypsum Plain Area is Devoid of Vegetation including Grasses	99
Figure 5-7: An Unidentified Lichen Species (probably <i>Caloplaca spp.</i>) Observed in the GHDP Area	101
Figure 5-8: Off Road Driving and Old Tracks Remain Visible for Years in the Sandy Gravel Gypsum Plain Areas.....	104
Figure 5-9: Various Past and Present Construction Activities have Degraded the General Area	104
Figure 5-10: Litter is Scattered throughout the Area	105
Figure 5-11: A Well Frequented Brown Hyena (<i>Parahyaena (Hyaena) brunnea</i>) Resting Site Beneath the Granite Riverbank	106
Figure 5-12: The Eroded Granite Riverbank System Viewed as the Most Important Habitat in the General GHDP Area	106
Figure 5-13: A Well Vegetated Hummock System in One of the Ephemeral Tumas River Drainage Lines further to the North of the GHDP Area. Such a Well-Developed Hummock System is Viewed as Unique and can be Compared to the Sparsely Vegetated Drainage Line in the GHDP area. 107	107
Figure 5-14: An Example of a Dolerite Ridge, Further to the North of the GHDP Area, Viewed as a Unique Habitat to a Variety of Flora and Vertebrate Fauna	107
Figure 5-15: Animal Tracks Registered within the GHDP (RCHS, 2022)	109
Figure 5-16: The Endemic <i>Arthroa Leubnitziae</i> Recorded in the Footprint of the Project (RCHS, 2022)	110

Figure 5-17: Top Image Shows the Distance of the Site from Dune 7 Dune Fields in the Foreground while the Bottom Image is the Periphery Bordering the site (RCHS, 2022).....	112
Figure 5-18: Site Beacon (White Stones) Scaled at Local Level (RCHS, 2022)	113
Figure 5-19: Walkover Survey within the Proposed GHDP Site (RCHS, 2022).....	114
Figure 5-20: An Edited Satellite Map of the Dorob National Park, indicating its Geographical Boundaries and GHDP Site Location	117
Figure 5-21: Erongo Region (Blue Highlight) in Relation to the Distribution of Archaeological Sites in Namibia (John Kinahan, 2012).....	118
Figure 5-22: Off-roads Vehicle Tracks found in the Project Site (RCHS, 2022)	120
Figure 5-23: Rehabilitated Surface Land of the Project Site (RCHS, 2022)	121
Figure 5-24: The Site Repertoire: Surface Finds with Project Site. From A, C & E is the Debris of Rusted Cans and Broken Glass while B and D are Indeterminate Objects (RCHS, 2022)	122
Figure 5-25: A Fragment Mandible of Upper Maxillary Cheek Dental of an Unidentified Animal / Probably a Horse (RCHS, 2022)	123
Figure 5-26: Surface Water Resources	125
Figure 5-27: Topography	127
Figure 5-28: Visual Context - Study Area	130
Figure 5-29: Visual Sensitivity Map	132
Figure 5-30: Viewshed Analysis in terms of Local Landmarks.....	134
Figure 5-31: Artist Impression of the Proposed Cleanergy GHDP	135
Figure 5-32: Artist Impression of the Proposed Cleanergy GHDP (2)	136
Figure 5-33: Walvis Bay Temperatures (°C) (Weather Atlas, 2022).	138
Figure 5-34: Walvis Bay Relative Humidity (%) (Weather Atlas, 2022).	139
Figure 5-35: Walvis Bay Rainfall (mm) (Weather Atlas, 2022).....	140
Figure 5-36: Soil Map	141
Figure 5-37: Land Use	144
Figure 5-38: Infrastructure Map	146
Figure 5-39: Geology	148
Figure 5-40: Protected Areas	150

Disclaimer

The opinions expressed in this Report have been based on the information supplied to SRK Consulting (South Africa) (Pty) Ltd (SRK) by the Cleanergy Solutions Namibia (Pty) Ltd (Cleanergy). The opinions in this Report are provided in response to a specific request from Cleanergy to do so. SRK has exercised all due care in reviewing the supplied information. Whilst SRK has compared key supplied data with expected values, the accuracy of the results and conclusions from the review are entirely reliant on the accuracy and completeness of the supplied data. SRK does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. Opinions presented in this report apply to the site conditions and features, as they existed at the time of SRK's investigations, and those reasonably foreseeable. These opinions do not necessarily apply to conditions and features that may arise after the date of this Report, about which SRK had no prior knowledge nor had the opportunity to evaluate.

List of Abbreviations

Abbreviation	Description
ATC	Air Traffic Control
AQI	Air Quality Index
BESS	Battery Energy Storage System
BID	Background Information Document
CITES	Convention on International Trade in Endangered Species
CRR	Comments and Response Register
DC	Direct Current
DEA	Department of Environmental Affairs
EAP	Environmental Assessment Practitioners
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMA	Environmental Management Act
EMP	Environmental Management Plan
EDI	Electricity Distribution Industry
ESI	Electricity Supply Industry
GDP	Gross Domestic Product
GHDP	Green Hydrogen Demonstration Plant
GIS	Geographic Information System
Ha	Hectare
I&AP	Interested and Affected Parties
IWRM	Integrated Water Resource Management
IFC	International Finance Corporation
ILO	International Labour Organisation
IUSDF	Integrated Urban Spatial Development Framework
KDCA	Kuiseb Delta Conservation Areas
kV	Kilo Volt
kVA	kiloVolt-Ampere
kW	Kilo Watt
LOHC	Liquid Organic Hydrogen Carriers

MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MEGC	Multiple Elements Gas Container
MFMR	Ministry of Fisheries and Marine Resources
MME	Ministry of Mines and Energy
MVA	MegaVolt Ampere
MW	Mega Watt
MW _p	Megawatts-peak
MWAF	Ministry of Agriculture, Water and Forestry
NHC	National Heritage Council
NHI	National Heritage Council
NIMT	Namibian Institute of Mining and Technology
NIPDB	Namibia Investment Promotion and Development Board
NUST	Namibia University of Science and Technology
PEM	Polymer Electrolyte Membrane
PoS	Plan of Study
PPP	Public Participation Process
PS	Performance Standard
PV	Photo Voltaic
SADC	Southern African Development Community
SMME	Small, Medium and Micro Enterprises
SRK	SRK Consulting (South Africa) (Pty) Ltd
ToR	Terms of Reference
UN	United Nations
UNAM	University of Namibia
UNCBD	United Nations Convention on Biological Diversity
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
V	Volt
WBRR	Walvis Bay Biodiversity Report
WHO	World Health Organisation
WRMA	Water Resources Management Act

1 Introduction and Background to Proposed Project

In 2021, a joint venture was established between the Ohlthaver & List Group of Companies (Namibia's largest privately held group of companies) and CMB.TECH (a Belgian owned company working towards the development of large marine and industrial applications for hydrogen). The joint venture, Cleanergy Solutions Namibia (Pty) Ltd, aims to be the first company in Namibia to produce commercial grade hydrogen from water, utilising renewable energy sources.

Cleanergy Solutions Namibia (Pty) Ltd (henceforth referred to as either the proponent or Cleanergy) appointed SRK Consulting (South Africa) (Pty) Ltd (hereafter referred to as SRK) to facilitate the Environmental Impact Assessment (EIA) process for the proposed pilot site, also referred to as the Green Hydrogen Demonstration Plant (GHDP).

The proposed GHDP will be located outside Walvis Bay on Farm 58 (in the new industrial zone), near the Walvis Bay International Airport and Dune 7 (inland to the Dune), to the East of the new Walvis Bay-Swakopmund highway (D1984). The total size of the area to be developed will be approximately 26 hectares (ha).

Main components of the GHDP will include:

- Five (5) Megawatts-peak (MW_p) solar Photovoltaic (PV) plant, with tracker configuration covering an area of 15 ha;
- Five (5) Megawatt (MW) Polymer Electrolyte Membrane (PEM) electrolyser;
- One (1) hydrogen generation alkaline electrolyser system with a capacity of 100-300 Kilowatt (KW)/2-6 kg/h.
- Compressors to densify the hydrogen gas for storage;
- Buffer tanks and storage tanks (300 bar/500 bar);
- A hydrogen fuelling station; and
- Information centre/building, which will also be used for training and operations.

The following secondary infrastructure will also be required:

- Access road;
- Water connection (pipeline connecting to main NamWater supply); and
- Grid connection (ErongoRed).

It should be noted that the grid connection will also require an Environmental Clearance Certificate (ECC), but that the process will be managed outside the current application due to some minor technical components which still need to be finalised and the fact that responsibility for complying with the requirements of the ECC will fall within the ambit of ErongoRed.

The demonstration project will be started at a 5 MW scale to:

- Evaluate the efficiency of current available technology within the Namibian context;
- Develop the required skills and competencies locally to operate and maintain the demonstration and possible commercial plant, as well as to share the necessary knowledge to allow for the conversion of existing equipment to allow for the utilisation of hydrogen as a fuel; and

- Develop an offtake for the green hydrogen locally (thus providing additional benefit to the country) to ensure multiple markets for the final product e.g., by converting heavy vehicles used in mining and within the port area to dual fuel vehicles.

One of the critical components of the demonstration plant will be the training centre, with course content being developed along with local vocational training and academic institutions, in order to ensure that the long-term staffing needs of the pilot and commercial facilities can be met. Cleanergy thus wants to commence with the construction of the training centre as soon as possible, in order to ensure that the necessary skills and competencies become available.

SRK, as the appointed Independent Environmental Assessment Practitioner (EAP), compiled an application for an ECC and conduct an EIA process together with the associated Public Participation Process (PPP) in terms of the Environmental Management Act (Act No. 7 of 2007) (EMA) and the associated Regulations 30 of 2012 (Figure 1-1) for the proposed GHDP. The PPP is to be undertaken in terms of Regulation/Part 21 of EMA.

Development and operation of the proposed GHDP is subject to the application and granting of an ECC in terms of Regulation/Part 6 of the EMA by the Ministry of Environment, Forestry and Tourism (MEFT), the competent authority.

An application was therefore submitted to the MEFT in terms of EMA and its associated EIA Regulations. Commenting authorities will review the application for the ECC and relevant reports, submit comments to the MEFT for their final review and decision.

This Scoping Report provides a description of the proposed project and sets out the proposed scope of the EIA and Environmental Management Plan (EMP) that will be undertaken for the proposed construction, operation, maintenance and decommissioning of the proposed GHDP. This includes alternatives which have been evaluated for various aspects of the project, the anticipated potential environmental impacts, issues raised by stakeholders, the specialist studies that will be undertaken including the terms of reference of the specialist studies, and the qualifications and experience of the study team.

PPP is a key element of the environmental decision-making process, and PPP forms part of the Scoping Phase as well as the Impact Assessment Phase.

The Scoping Report was made available for public review prior to submission to MEFT for authorisation. All the comments received were captured and addressed where feasible in the Scoping Report as well as the Environmental Impact Assessment Report (EIAR).

This document is intended to guide the EIA process and specialist studies by:

- Providing an overview of the legal requirements regarding to the proposed project, the project description and anticipated environmental and social issues and impacts that will be further investigated in the EIA; and
- Setting out the scope of the EIA process and the Terms of Reference (ToR) for specialist studies and outlining the approach and methodologies to be used in the EIA process, e.g., the proposed impact rating methodology.

This report is submitted to the MEFT for their decision.

Figure 1-1 provides an illustration of the proposed EIA process that will be followed.

1.1 Environmental Impact Assessment Process Summary

The Namibian application and granting of an ECC process consists of primarily of two phases, the Scoping and Impact Assessment Phases. After submitting the application documents to the MEFT, a

Draft Scoping Report can be compiled and submitted for public review and comment. Within 14 days of receipt of the application and final scoping report by the Environmental Commissioner, the Scoping Report should be accepted or rejected.

Specialist studies can then commence, and the Draft EIAR and EMP can be compiled. These draft documents also need to be sent out for public review and comment, after which the Final EIA report and EMP is submitted to the MEFT for review and decision making. If the EIA and EMP are accepted, an ECC will be issued.

Figure 1-1 provides an illustration of the EIA process that will be followed.

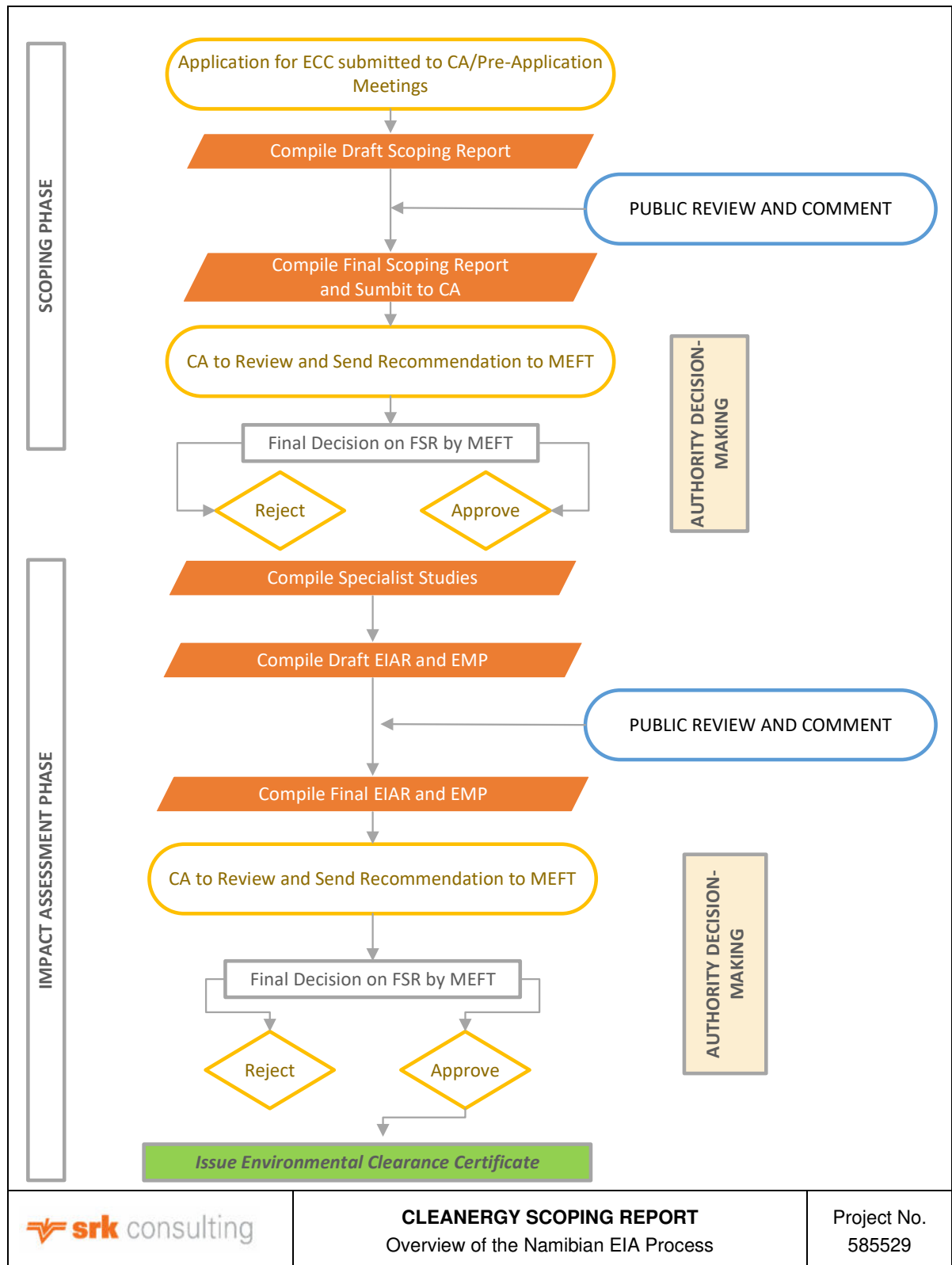


Figure 1-1: Overview the Namibian Environmental Impact Assessment Process

1.2 Opportunity to Comment

The Scoping Report documents the methodology followed and the findings of the scoping process as undertaken to date. Comments received through the PPP undertaken thus far (Please refer to Section 2.2.4) have been collated into a Comments and Responses Register (CRR) (Appendix C_10).

The Scoping Report was made available for a 14-day commenting period from **4 October 2022** to **17 October 2022**, to provide Interested and Affected Parties (I&APs) the opportunity to comment on the environmental and social aspects associated with the proposed GHDP.

I&APs were requested to provide comments and information on the following aspects of the proposed project:

- Information on how I&APs consider that the proposed activities will impact on them or their socio-economic conditions;
- Written responses stating their suggestions to mitigate the anticipated impacts of each activity;
- Information on current land uses and their location within the area under consideration;
- Information on the location of environmental features on site to make proposals as to how and to what standard the impacts on site can be remedied; and
- How to mitigate the potential impacts on their socio-economic conditions and to make proposals as to how the potential impacts on their infrastructure can be managed avoided or remedied.

The availability of the Scoping Report was announced by means of letters and emails sent to registered I&APs.

In addition to emailing an Executive Summary of the Scoping Report to Registered I&APs, the Report was also made available to the public via the SRK's website at www.srk.com by clicking on the following link [Draft Scoping Report for the Proposed Green Hydrogen Demonstration Plant in Walvis Bay, Namibia \(srk.com\)](http://www.srk.com).

Copies of the Scoping Report have been made available at the following public places for review:

- Narraville Library; and
- Walvis Bay Library.

The Scoping Report was also made available to commenting authorities during the PPP.

Comments on the Scoping Report were submitted to SRK at the details shown below. These comments were used to update the Final Scoping Report for submission to MEFT for review and acceptance.

To allow for comments to be included in the Final Scoping Report, I&APs were requested to submit comments to SRK by **17 October 2022**. If the Scoping Report is accepted by MEFT, the project will proceed on to the EIA Phase.

Please submit comments to the Public Participation officers:

Ms. Marissa Swart	Dr Laetitia Coetser
PostNet Suite #177, Private Bag X20009, Garsfontein, GT- South Africa, 0042	PostNet Suite #177, Private Bag X20009, Garsfontein, GT- South Africa, 0042
+27 (0) 12 361 1908	+27 (0) 12 361 1908
MSwart@srk.co.za	LCoetser@srk.co.za

2 Environmental Impact Assessment Approach and Methodology

2.1 Environmental Impact Assessment Project Team

SRK Consulting has been appointed by Cleanergy as the independent EAP, to conduct an EIA process together with the associated PPP for the proposed GHDP.

SRK was established in 1974 and has since undertaken a large variety of environmental studies. SRK is a South African founded international organisation of professionals providing a comprehensive range of consulting services to natural resource industries and organisations. South African offices are staffed with over 400 professional consultants in nine offices, operating in a range of disciplines, mainly related to the environment, water, social, and mining sectors. Back-up and peripheral expertise are available within these offices for all environmental projects.

The details of the team, including the EAPs and specialists undertaking the EIA process are provided in Table 2-1.

Table 2-1: EAP Contact Details

EAP Name	Contact Number	Email Address
Dr Laetitia Coetser Project Partner and EAP	+27 (0) 12 361 1908	lcoetser@srk.co.za
Ndomupe Masawi Project Manager and EAP	+27 (0) 12 361 1908	nmasawi@srk.co.za
Marissa Swart Project Consultant	+27 (0) 12 361 1908	mswart@srk.co.za
Fredrika Shagama Project Consultant	+26 (0) 81 407 5536	fredrika@serjaconsultants.com
Environmental and Social Specialists ²		
Environmental Aspect	Name	Consultant
Heritage and Archaeology Impact Assessment	Dr Alma Nankela (Research Culture Heritage Services CC: Archaeosciences & Consultants)	ahamulo@gmail.com / rcheritageservices@gmail.com
Biodiversity Impact Assessment	Peter L Cunningham (Environment & Wildlife Consulting, Namibia)	pckkwrc@yahoo.co.uk
Visual Impact Assessment	Theo Bredell (In Site Landscape Architects)	theo@insitegroup.co.za
Surface and Geohydrological Impact Assessment	Diganta Sarma (Namib Hydrosearch)	diganta@namibhydro.com
Socio-Economic Impact Assessment	Randolph Mouton (Sustainable Development Africa cc)	randolphmouton@susdaf.com

Dr Laetitia Coetser is a Partner within SRK and has been involved in the field of water and environmental management for more than 23 years. She holds a PhD. in Water Resource Management at the University of Pretoria and is a registered Professional Natural Scientist

² It is noted that additional specialist studies may still be required.

(SACNASP) (Pr. Sci. Nat 400312/06). She has an in-depth understanding and application of Integrated Environmental Management. She provides specialist advice to EIAs and EMPs as well as to Water Use Authorisations/Permitting. Laetitia has a range of specialisations including water resource management, surface water management, stakeholder engagement, data management and interpretation, environmental compliance auditing and due diligences. She has solid knowledge and understanding of the environmental legislation and subsequent regulations. Laetitia has further been involved with acid mine treatment and diffuse pollution and has compiled numerous articles and presentations on these matters. She is therefore well placed to be the Team Leader on this project.

Ndomupei Masawi is a registered Professional Natural Scientist (SACNASP Reg Number 400045/14) with an MSc Degree in Geo-Information for Environmental Management and an MSc Degree in Integrated Water Resource Management. Ndomupei has more than 15 years of Integrated Environmental Management and project management experience. Her experience includes compiling Environmental Management Plans, undertaking Public Participation Processes, providing Geographic Information System (GIS) Services and undertaking the processes and assessments to support applications for Environmental Authorisations, Water Use Authorisation/Permitting, Waste Management Licences and Air Emission Licences, for steel galvanizing, roads, railway lines, power stations, airports, dams, housing developments, schools in South Africa, Tanzania, Botswana, Lesotho, Zimbabwe, and Uganda.

Fredrika Shagama is a Geological Engineer (Hydrogeologist) with 7 years of experience in Groundwater and Environmental Consulting, with experience both in Namibia (mainly), South Africa and the Czech Republic. Her core skills are in Hydrogeology (Groundwater exploration, Supply, Drilling supervision, Impact Assessment and monitoring), Geotechnical investigation phase 1. Although Fredrika is a geological engineer (Hydrogeologist) by qualification and experience, she has also gained valuable experience in conducting EIAs and compilation of EMPs, facilitating EIA Consultation meetings and Stakeholders' Engagement. The specific groundwater and EIA project responsibilities range from proposal writing, technical report compilation, public meeting facilitation, site visits & assessments (fieldwork) to environmental compliance monitoring / auditing on sites.

Marissa Swart holds an Honours degree in Geography and Environmental Science and is busy completing her master's degree in Environmental Management. Ms Swart is a newly appointed Junior Environmental Scientist at SRK and is eager to gain experience in the Environmental Management field.

The Curriculum Vitae and declaration of interest of the EAP team and the background on experience gained by SRK in the field of Environmental Impact Assessments are provided in Appendix A.

2.2 Environmental Impact Assessment Process

The Environmental Commissioner can issue an ECC upon receipt of an application for environmental clearance in the form of EIA or for classified small project projects through receipt of baseline information on the likely environmental impacts associated with the proposed project. During previous engagements with MEFT, the expectation was established that a Scoping and EIA ECC Application process will need to be followed.

In order to ensure compliance with the objectives of EMA and the EIA Regulations, the EIA process seeks to identify the environmental consequences of a proposed project from the beginning, and helps to ensure that the project, over its life cycle, will be environmentally acceptable, and integrated into the surrounding environment in a sustainable way. It further seeks to provide the decision-making authorities with sufficient and accurate information in order to make a sound decision on the proposed development and set conditions that must be adhered to.

The EIA process for the proposed GHDP Project is undertaken in three phases:

- Project Initiation (Screening) Phase;
- Scoping Phase; and
- Impact Assessment Phase.

Sections 2.2.1 - 2.2.3 provide a summary of the approach taken as well as the key steps and corresponding activities.

2.2.1 Project Initiation Phase

The GHDP Project Initiation Phase has been completed and included the following tasks:

- Project inception and initiation meetings between Cleanergy and the SRK Consulting;
- Desktop review of the available information to become familiar with the project, the geographical area, other projects in the area and any other information that may assist in the execution of the project;
- Undertaking of a site visit to conduct a preliminary assessment of the baseline conditions at the project site and area of impact;
- Scoping of key environmental risks/potential impacts, and confirm the need for the identified detailed studies;
- Identification of key stakeholders that need to be involved in the project and compilation of a Stakeholder Database;
- Confirmation of the list of activities, according to the EMA, that is associated with the project, and which may not commence without an ECC;
- Confirmation of the Stakeholder Engagement approach; and
- Establishing Scoping Phase Requirements.

2.2.2 Scoping Phase

Objectives of the Scoping Phase

The objectives of the EIA Scoping Phase process for the proposed GHDP Project included:

- Registration of the project and EIA process with the relevant Competent Authority, MEFT. This was done through the submission of a hard copy of the application to MEFT's offices on 16 August 2022 (Appendix B);
- Provide opportunity to identified stakeholders and registered I&APs to be involved in the process through an interactive PPP;
- Providing an overview of the legal requirements with regards to the proposed project;
- Provide baseline environmental and social information of the project area;
- Identification of gaps in relevant environmental and social legislation;
- Identify anticipated key environmental and social issues and impacts that will be further investigated in the EIA;
- To assess the receiving environment in terms of current state and determine potential positive or negative impacts which may result due to the proposed development;
- To consider alternatives for achieving the project's objectives;

- To identify significant issues to be investigated further during the execution of the EIA phase; and
- Setting out the scope of the EIA process (Plan of Study (PoS)) and the ToR for specialist studies and outlining the approach and methodologies to be used in the EIA process, e.g., the proposed impact rating methodology.

Compilation of the Scoping Report

The EIA process for the GHDP Project is currently in the Scoping Phase (Please refer to Figure 1-1). Section 8 of GNR 30 of 2012 (EIA Regulations) published in terms of the EMA stipulates the minimal requirements and issues that need to be addressed in the Scoping Report. This report strives to address all these requirements as per regulations. Comments received during the Public Participation Process (Section 2.2.4) undertaken to date have also been incorporated into this report.

Table 2-2 provides a Scoping Report Index in relation to the EIA Regulations that have been addressed and the section of the Scoping Report where these requirements can be found.

Table 2-2: Requirements of Regulation 8 of GNR 30

Section of the EIA Regulations, 2012	Description of EIA Regulations Requirements for Scoping Reports	Completed	Section
Regulation 8	A scoping report must include –		
Regulation 8 (a)	The curriculum vitae of the EAP who prepared the report.	Yes	Section 2.1 Appendix A
Regulation 8 (b)	A description of the proposed activity.	Yes	Section 4
Regulation 8 (c)	A description of the site on which the activity is to be undertaken and the location of the activity on the site.	Yes	Section 4.3
Regulation 8 (d)	A description of the environment that may be affected by the proposed activity and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed listed activity.	Yes	Section 5
Regulation 8 (e)	An identification of laws and guidelines that have been considered in the preparation of the scoping report.	Yes	Section 3
Regulation 8 (f)	Details of the public consultation process conducted in terms of regulation 7(1) in connection with the application, including –		
Regulation 8 (f) (i)	The steps that were taken to notify potentially interested and affected parties of the proposed application;	Yes	Section 2.2.4
Regulation 8 (f) (ii)	Proof that notice boards, advertisements and notices notifying potentially interested and affected parties of the proposed application have been displayed, placed or given;	Yes	Section Appendix C
Regulation 8 (f) (iii)	A list of all persons, organisations and organs of state that were registered in terms of regulation 22 as interested and affected parties in relation to the application; and	Yes	Appendix C_ 1
Regulation 8 (f) (iv)	A summary of the issues raised by interested and affected parties, the date of receipt of and the response of the EAP to those issues.	Yes	Section 2.2.4 Appendix C_ 10
Regulation 8 (g)	A description of the need and desirability of the proposed listed activity and any identified alternatives to the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives have on the environment and on the community that may be affected by the activity.	Yes	Section 2.2.4

Section of the EIA Regulations, 2012	Description of EIA Regulations Requirements for Scoping Reports	Completed	Section
Regulation 8 (h)	A description and assessment of the significance of any significant effects, including cumulative effects that may occur as a result of the undertaking of the activity or identified alternatives or as a result of any construction, erection or decommissioning associated with the undertaking of the proposed listed activity.	Yes	Section 7
Regulation 8 (i)	Terms of reference for the detailed assessment.	Yes	Section 8
Regulation 8 (j)	A draft management plan, which includes –		
Regulation 8 (j) (aa)	Information on any proposed management, mitigation, protection and remedial measures to be undertaken to address the effects on the environment that have been identified including objectives in respect of the rehabilitation of the environment and closure;	Yes	To be included in EIAR
Regulation 8 (j) (bb)	As far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of the activity or specified activity to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and	No	To be included in EIAR
Regulation 8 (j) (cc)	A description of the manner in which the applicant intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation remedy the cause of pollution or degradation and mitigation of pollutants.	Yes	To be included in EIAR
Regulation 9	The terms of reference for an assessment must set out the approach that the proponent intends to follow in undertaking an assessment in accordance with the Act, these regulations and guidelines must include -	Yes	Section 8
Regulation 9 (a)	A description of all tasks to be undertaken as part of the assessment process, including any specialist to be included if needed;	Yes	Section 8
Regulation 9 (b)	An indication of the stages at which the Environmental Commissioner is to be consulted;	Yes	Section 8.8.2
Regulation 9 (c)	A description of the proposed method of assessing the environmental issues and alternatives	Yes	Section 8.5
Regulation 9 (d)	The nature and extent of the public consultation processes to be conducted during the assessment process	Yes	Section 8.8

The Scoping Report was made available for a 14-day commenting period as detailed in Section 1.2.

Compilation of the Final Scoping Report

Where necessary, comments and concerns received from I&AP's, including commenting authorities, on the Draft Scoping Report were incorporated and addressed in the Final Scoping Report. The EIA team is submitting the Final Scoping Report to the MEFT for decision-making.

2.2.3 Environmental Impact Assessment Phase

Upon acceptance of the Final Scoping Report by the MEFT, a Draft EIAR and EMP will be compiled. The purpose of the impact assessment Phase of this EIA process is to systematically assess the impacts of the proposed project on the immediate and surrounding biophysical and socio environment. All comments received on the Draft EIAR will be addressed and taken into consideration prior to submission of the Final EIAR to the MEFT.

Environmental Management Plan

An EMP will be compiled with the aim at providing effective management and mitigation measures pertaining to the proposed development relating to the identified environmental impacts. These management and mitigation measures will strive to minimise the negative impacts of the proposed development and enhance the positive impacts.

Submission of Environmental Impact Assessment Report and Environmental Management Plan for Review

The Draft EIAR and EMP will be made available for a 14-day commenting period. Registered I&AP's will be notified of the availability of the Draft EIAR.

Where necessary, comments and issues raised by I&AP's during the commenting period will be consolidated into the Final EIAR and EMP with the relevant response issued by the EAP. The Final EIAR and EMP will then be submitted to the MEFT for decision making. The comments will also be collated into the CRR that will form an Appendix to the Final EIAR.

Authority Consultation

Ongoing consultation with the different authorities will be conducted during the EIA process. Further consultations with the competent authorities will be conducted should they become necessary. Authority consultation is considered an on-going process until a decision is made on the environmental application.

Alternatives

In accordance with Section 8(g) of the EIA Regulations, feasible alternatives need to be considered and assessed during the Scoping Phase of the project. During the Scoping Phase, based on professional judgement of the EAP, the engineering design consultants and I&AP comments, alternatives have been considered for the proposed GHDP. In addition to these alternatives, the "no-go" alternative will also be assessed.

Specialist Studies

Based on the outcome of the Scoping Phase, various specialist studies have been identified to provide information and expert opinion necessary to address key issues requiring further investigation and detailed assessment (Section 8.4).

The following site-specific specialist studies will be conducted during the impact assessment phase:

- Biodiversity Impact Assessment;
- Heritage and Archaeology Impact Assessment;
- Visual Impact Assessment;
- Surface and Geohydrological Impact Assessment; and
- Socio-Economic Impact Assessment³.

Section 8.4 summarises the ToR for each of the specialist studies. The generic ToR for each specialist study are to:

³ Due to the importance placed on this item by the proponent, it was decided to allow the consultant to define the baseline of the socio-economic component outside the formal EIA process and then to proactively work with the proponent and contractors to develop sensible mitigation controls prior to the start of construction. Therefore, the socio-economic study will not be part of the formal EIA process but will be executed as part of the EMP in order to make it more proactive.

- Describe the existing baseline characteristics of the study area and place this in a regional context;
- Identify and assess potential impacts resulting from the project (including impacts associated with the construction and operation of the project), using SRK's prescribed impact rating methodology;
- Identify and describe potential cumulative impacts resulting from the proposed development in relation to proposed and existing developments in the surrounding area;
- Recommend mitigation measures to avoid or minimise impacts and/or optimise benefits associated with the proposed project; and
- Recommend and draft a monitoring plan, if applicable.

Certain impacts that are anticipated to be of limited or lower significance, either by virtue of the scale of the impacts, their short duration (e.g., construction phase only), disturbed nature of the receiving environment and/or distance to communities, will be assessed by EAP Team and reported directly into the EIAR.

2.2.4 Public Participation Process

The PPP is prepared in response to the requirements of Regulation/Part 21 of the EMA. Regulation 21 require that a person (proponent, specialist, EAP or other professional) who undertakes public participation as part of an environmental impact assessment process to obtain an ECC, must do the public participation process in compliance with the following:

- *“(2) The person conducting a public consultation process must give notice to all potential I&APs of the application which is subjected to public consultation by –*
 - (a) fixing a notice board at a place conspicuous to the public at the boundary or on the fence of the site where the activity to which the application relates is or is to be undertaken;*
 - (b) giving written notice to -*
 - i. the owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site;*
 - ii. the local authority council, regional council and traditional authority, as the case may be, in which the site or alternative site is situated;*
 - iii. any other organ of state having jurisdiction in respect of any aspect of the activity; and*
 - (c) advertising the application once a week for two consecutive weeks in at least two newspapers circulated widely in Namibia.*
- *(3) A notice, notice board or advertisement referred to in sub-regulation (2) must -*
 - (a) give details of the application which is subjected to public consultation; and*
 - (b) state -*
 - i. that the application is to be submitted to the Environmental Commissioner in terms of these regulations;*
 - ii. the nature and location of the activity to which the application relates;*
 - iii. where further information on the application or activity can be obtained: and*

- (c) *the manner in which and the person to whom representations in respect of the application may be made.*
- (4) *A notice board referred to in sub-regulation (2) must be of a size at least 60cm by 42cm.*
 - (5) *If a deviation from sub-regulation (2) is appropriate the person conducting the public participation process may deviate from the requirements of that sub-regulation to the extent and in the manner agreed by the Environmental Commissioner after consultation with the competent authority.*
 - (6) *When complying with this regulation, the person conducting the public consultation process must ensure that -*
 - (a) *information containing all relevant facts in respect of the application is made available to potential I&APs; and*
 - (b) *consultation by potential I&APs is facilitated in such a manner that all potential I&APs are provided with a reasonable opportunity to comment on the application.*
 - (7) *The public consultation process -*
 - (a) *in respect of an application for an environmental clearance certificate in terms of regulation 6(1); and the notification of an application and an assessment report in terms of regulation 16(1)(h),*
 - *must be completed within 21 days.”*

Approach to Public Participation

The PPP forms an important part of the ECC application process. The PPP is aligned with Regulation 21 of EMA. The following tasks have been undertaken in line with the stated regulations:

- Role players, including potential and registered I&APs, state departments, organs of state, and the Competent Authority (MEFT) will be provided with an opportunity to obtain clear, accurate and understandable information about the environmental impacts of the proposed activity and the implications associated with proceeding with the proposed project. SRK compiled a list all role players (please refer to Appendix C_1) focussing on landowners/land occupiers of the affected properties and of the properties immediately adjacent to the affected properties, this list will be updated continuously throughout the process until the authorisation is obtained;
- Providing the role-players for which contact information is available, and other registered and potential I&APs an opportunity to voice their concerns and questions regarding the proposed project, during the project announcement phase and the impact assessment phase of the project;
- Registered I&APs will be notified of the outcome of the application process, once the ECC is received/denied from the Competent Authority (MEFT);
- Incorporating the needs, preferences and values of role-plays and I&APs voiced, into the proposed project’s environmental authorisation process;
- Provide opportunities to clear up misunderstandings about technical issues, resolving disputes and reconciling conflicting interests associated with the proposed project; and
- Encouraging transparency and accountability in decision-making during the PPP.

The primary aim is to afford I&APs the opportunity to understand the project, prioritises the participation of parties who potentially have an interest in the proposed project, or may be directly or indirectly

affected by the proposed development. The process sought to lead to a joint effort by stakeholders, technical specialists, the authorities, and the proponent/developer through working together to produce better decisions than if they had acted independently.

The PPP will be conducted in two phases:

- Phase 1 – Scoping Phase; and
- Phase 2 – Impact Assessment Phase.

The EIA process is currently in the Scoping Phase whereby the Scoping Report has been compiled. The Scoping Report was distributed to Stakeholders and I&APs for a 14-day commenting period after which the Final Scoping Report was compiled and sent to Stakeholders and I&APs.

Table 2-3 summarises the PPP followed during the Scoping Phase.

Table 2-3: Public Participation Plan for the Proposed Cleanergy GHDP

Task	Activities	Date
Notification of Project to Regulatory Authorities and Registered Interested and Affected Parties		
Stakeholder Identification and Database Development	I&APs were identified and contact details obtained where possible using databases from other EIAs conducted in the area, engagements with key stakeholders, telephone calls and meetings. A stakeholder database was developed and maintained throughout the process (Please refer to Appendix C_1 for a copy of the Stakeholder Database).	July – September 2022
Project Announcement Letters	Project Announcement letters (Appendix C_2) and Background Information Documents (BIDs) (Appendix C_3) were distributed to all I&APs on the Stakeholder Database. Please refer to C for an example of the notifications sent via e-mail.	August – September 2022
Background Information Document (BID)	Background Information Documents (BIDs) describing the project and the legal requisites associated with the Authorisation process were compiled. The BID included a Reply Form (Appendix C_3), which granted the public opportunity to register as an I&AP, and to raise queries or concerns regarding the project. BIDs were distributed electronically (where possible) to all I&APs on the Stakeholder Database (Please refer to Appendix C_2 for copies of the Project Announcement Letters). Copies of the BIDs were also made available on request to SRK. A copy of the BID was also made available on the SRK website. Appendix C_3 for a copy of the BID.	July – September 2022
Newspaper Advertisements	Newspaper advertisements providing information on the proposed project, the availability of the BID and time and venue of planned public meeting were placed in two newspapers (circulated widely in Namibia) for two consecutive weeks, in English: <ul style="list-style-type: none"> • The Namib Times (5 August 2022 and 12 August 2022); and • The Namibian Newspapers (8 August 2022 and 15 August 2022); Please refer to Appendix C_4 for copies of the advertisements placed.	August 2022
Site Notices	English site notices (Sized 60 cm x 42 cm) were placed at the following locations on 17 August 2022 (Please refer to Appendix C_5 for photos of the site notices as well as a layout illustrating their positions): <ul style="list-style-type: none"> • On-site, next to D1984 road (x2); • Dune 7 Adventures; • Wormann Brock Narraville Supermarket; • Checkers, Dunes Mall; and • Walvis Bay Library. 	July – September 2022
Other	English advertisement was placed on the Walvis Bay Municipality Facebook Page on 11 August 2022 (Please refer to Appendix C_6 for a copy of the post as placed); and Telephonic Consultation with key stakeholders.	August - September 2022
Meeting with Competent Authorities	A meeting was held with the Competent Authority (MEFT) to confirm approach and listed activities prior to commencement of the application process (Appendix C_7 for Minutes of the Meeting).	17 August 2022
Scoping Phase Meetings and Submission of Comments		

Task	Activities	Date
Focus Group Meetings	Focus group meetings were held with: <ul style="list-style-type: none"> • Walvis Bay Municipality officials on 18 August 2022 (Please refer to Appendix C_ 8 for Minutes of the Meeting); • Walvis Bay International Airport officials on 19 August 2022 (Please refer to Appendix C_ 8 for Minutes of the Meeting); and • ErongoRed on 18 August 2022 (Please refer to Appendix C_ 8 for Minutes of the Meeting). 	18 – 19 August 2022
Public Meeting	A public meeting was held in Walvis Bay at Amjicaja Guesthouse (No 8 Temple Crescent, Meersig) on Thursday 18 August 2022 at 18h00. The presentation that was made at the meeting and the Minutes of the Meeting are attached in Appendix C_ 9.	18 August 2022
Comments and Responses	The CRR can be found in Appendix C_ 10 detailing all comments and responses received thus far. Comments received are attached in Appendix C_ 11. The registration and initial commenting period ended 2 September 2022. Comments received from Commenting Authorities are attached in Appendix C_ 12.	August – September 2022
Review of Scoping Report		
Scoping Report for public and Authorities Comment	<p>The availability of the Scoping Report was announced by means of letters and emails sent to registered I&APs. An Executive Summary of the Scoping Report was also distributed to all Stakeholders and I&APs via emails that are registered on the Stakeholder Database (Appendix C_1).</p> <p>In addition to emailing an Executive Summary of the Scoping Report to Registered I&APs, the Report was also made available to the public via the website at www.srk.com by clicking on the following link Draft Scoping Report for the Proposed Green Hydrogen Demonstration Plant in Walvis Bay, Namibia (srk.com).</p> <p>Hard copies of the Scoping Report were made available at the following public places:</p> <ul style="list-style-type: none"> • Narraville Library; and • Walvis Bay Library. <p>The availability of the Scoping Report was announced by means of letters and emails sent to registered I&APs. As per request made by MEFT during the meeting held 17 August 2022, hard copies (as well as electronic copies), of the Scoping Report were distributed to the following commenting authorities:</p> <ul style="list-style-type: none"> • The Green Hydrogen Commissioner; • The Ministry of Mines and Energy (MME); • Ministry of Agriculture, Water and Forestry (MWAFF); and • Ministry of Defence. <p>Hard copies (as well as electronic copies) of the Scoping Report were further distributed to the following commenting authorities:</p> <ul style="list-style-type: none"> • Ministry of Industrialisation, Trade and Small and Medium Enterprises (SMEs) Development; • Governor of Erongo; • Namibia Investment Promotion and Development Board (NIPDB); 	

Task	Activities	Date
	<ul style="list-style-type: none"> • Walvis Bay Municipality; • ErongoRed; • Ministry of Urban and Rural Development; • National Heritage Council of Namibia; • National Botanical Research Institute; and • Ministry of Land Reform. <p>Electronic copies of the Scoping Report were also made available to the following bodies:</p> <ul style="list-style-type: none"> • Walvis Bay Airport; • Roads Authority; • NamPower; and • NamWater. <p>Authorities and IAPs were provided with 14 days to review the Scoping Report and submit comments in writing to SRK Consulting. The commenting period ended on the 17 October 2022.</p>	

Summary of Issues Raised

The I&APs were notified of the proposed project and application process and invited to provide comments during the pre-application public participation phase. The CRR can be found in Appendix C_ 10 detailing all comments and responses received thus far. Verbatim stakeholder communications and commenting authority correspondence are included in Appendix C_ 11 and Appendix C_ 12 respectively.

Issues that have been raised to date by I&APs and other Stakeholders can be summarised as:

- Requests to be registered as I&AP;
- Source of funding for the project;
- Potable water supply and the impact;
- Collaboration with other companies undertaking similar work in the area;
- Concerns relating to battery storage and connection to ErongoRed;
- Requirements to undertake a Social Impact Assessment;
- Negative Socio-Economic impacts associated with the proposed project;
- Upscaling of the GHDP;
- Cleaning associated with solar panels;
- Price competitiveness when compared to existing technologies;
- Number of people employed on-site;
- Involvement of Small, Medium and Micro Enterprises (SMMEs);
- Proximity of the GHDP to the Walvis Bay Airport and the associated impacts on the airport;
- Proximity of the GHDP to an artillery shooting range and a military base and the associated safety risks associated with green hydrogen storage;
- Potential impacts associated with increased traffic movement in the area;
- Potential impacts on biodiversity and the management thereof;
- Rehabilitation of the site;
- Climate change considerations; and
- Occupational health and safety management.

3 Environmental Policy Planning and Legal Framework

The EIA Regulations (2012) requires that all legislation and guidelines considered in the EIA process be documented. This Section provides an overview of the relevant Namibian legislation and policies considered and also provides an overview of the Namibian administrative framework and international treaties, industry standards and guidelines applicable to the Cleanergy GHDP Project.

3.1 Namibian Institutional and Administrative Structure

The Namibian Constitution makes provision for the creation and enforcement of applicable legislation. Five tiers of law exist and include:

- The Constitution;
- Statutory law;
- Common law;
- Customary law; and
- International law.

Numerous laws intended to protect the natural environment and to manage potential environmental impacts have been passed following the Independence of Namibia in 1990. Table 3-1 provides a summary of the applicable legislation, policies and guidelines identified as relevant to the proposed Cleanergy GHDP Project.

3.1.1 Ministry of Environment, Forestry and Tourism

MEFT develops, administers, and enforces environmental legislation and policy in Namibia. The mission of MEFT is to promote biodiversity conservation in the Namibian environment through the sustainable utilization of natural resources and tourism development for the maximum social and economic benefit of its citizens.

The MEFT's Department of Environmental Affairs (DEA) gives effect to Article 95L of the Constitution by promoting environmental sustainability and is responsible for, inter alia, the administration of the EIA processes undertaken in terms of EMA and the EIA Regulations (2012). The Environmental Commissioner serves as head of the DEA.

DEA will be responsible for the issuing of a decision on the ECC application in the form of an ECC, based on recommendations from other Commenting Authorities.

3.1.2 Ministry of Mines and Energy

The MME comprises of six directorates of which one is the Directorate of Energy. The Directorate of Energy consists of 2 divisions, namely the Electricity Division and the Renewable Energy Division.

The Directorate of Energy enforces compliance of legal requirements of energy legislation (Electricity Act, Act No. 4 of 2007).

In March 2017, a directive was issued from MEFT which requires that applications for ECC for projects relating to power generation be submitted to MME as the Competent Authority.

It is noted that the purpose of the Cleanergy GHDP Project is not that of power generation but rather that of alternative energy supply in the form of green hydrogen for the use in local heavy-duty equipment like trucks, locomotives, tugboats, port/mining equipment and gensets.

3.1.3 Ministry of Agriculture, Water and Land Reform

The Ministry of Agriculture, Water and Land Reform (MAWLR) has as its mission the realization of the potential of the Agricultural, Water and Forestry sectors towards the promotion of an efficient and sustainable socio-economic development for a prosperous Namibia. The MAWLR is mandated to promote, develop, manage and utilize Agricultural and Water resources.

It is noted that as potable water will be sourced from municipality with a direct connection to the main water pipelines, the Cleanergy GHDP Project will not require the installation of a desalination plant.

3.1.4 Ministry of Fisheries and Marine Resources

The Ministry of Fisheries and Marine Resources (MFMR) is responsible for the management and development of fisheries and aquaculture in Namibia. The Ministry is comprised of four directorates; two of which include the Directorate of Resource Management and Directorate of Operations and Surveillance.

The Directorate of Resource Management is responsible for scientific research and providing advice on the state of commercially important marine fish stocks and recommending catch quotas. It is also responsible for managing and regulating species fish size limits, dates of closed fishing seasons, declaring areas closed to fishing and determining fishing gear use.

The Directorate of Operations and Surveillance is responsible for monitoring, controlling and surveillance of fishing-related activities both at sea and onshore.

It is noted that the proposed Cleanergy GHDP Project will have no impact on marine ecology and the fishing industry due to its proximity to the sea and the fact that no desalination plant will be required.

3.1.5 Namibia Power Corporation and Regional Electricity Distributors

ErongoRed was formed by merging the service of electricity distribution from the various municipalities and town councils in the Erongo region namely: the Municipality of Walvis Bay, Swakopmund, Henties Bay and Omaruru; the Town Council of Karibib, Usakos and Arandis; Erongo Regional Council; and NamPower. All these individual institutions are shareholders of ErongoRed. The initiative to create REDs was part of the Electricity Supply Industry (ESI) and Electricity Distribution Industry (EDI) restructuring Policy to distribute and supply electricity through economies of scale, the pooling together of human and operational capital resources to ultimately stabilize electricity prices and ensure reasonable, affordable and cost-effective tariffs to electricity consumers.

The company purchases electricity from NamPower for both urban and rural customers. The electricity is then transmitted and distributed to the various customer segments ranging from residential, business and industrial. ErongoRed uses about 21% of the total electricity requirement of Namibia. The electricity industry in Namibia is regulated by the Electricity Control Board of Namibia, thus ErongoRed operates under set regulations.

A 5 MegaVolt Ampere (MVA) connection from the ErongoRed electricity distribution grid will be required. It should be noted that the grid connection will also require an ECC, but that the process will be managed outside the current application due to some minor technical components which still need to be finalised and the fact that responsibility for complying with the requirements of the ECC will fall within the ambit of ErongoRed.

3.1.6 Namibian Water Corporation

The Namibia Water Corporation (NamWater) is another key stakeholder in the project and the EIA process. NamWater supplies water in bulk to industries, government institutions, municipalities, local authorities, commercial entities, such as mines, and to the Directorate of Water Supply and Sanitation

in the Ministry of Agriculture Water and Land Reform. The Directorate in turn supplies water to rural communities.

NamWater is a commercialized water entity, wholly owned by the Government of the Republic of Namibia. NamWater's mandate is to provide quality water and related services to the satisfaction of all stakeholders, taking cognizance of the environment, scarcity of and dependency of all on water. The Board of Directors ensures that NamWater utilizes the scarce water resources in the best interests of Namibia and the Namibian People.

The water which will be used in the process, is potable water supplied directly to site from municipality with a direct connection to the main water pipelines. Depending on the season, it is anticipated that between 10 m³ and 14 m³/day of potable water will be required for the overall operation of the Proposed Cleanergy GHDP Project.

3.2 Namibian Legislation

Table 3-1 provides a summary of the applicable legislation, policies and guidelines identified as relevant to the proposed project. In addition, a description of how the proposed activity complies with and responds to the legislation and policy context, is provided. This list is not exhaustive but rather represents an indication of the most applicable pieces of environmental legislation relevant to the project.

Table 3-1 Policy and Legislative Context of Proposed Project

Legislation	Description and Relevance	Responsible Authority
Namibian Constitution First Amendment Act (Act No. 34 of 1998)	<p>Article 95 (l) of the Constitution of the Republic of Namibia states that <i>“the State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at ... maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of natural resources on a sustainable basis for the benefit of all Namibians both present and future; in particular the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian Territory.”</i></p> <p>Article 100 states <i>“that the land, water and natural resources below and above the surface of the land ... shall belong to the State if they are not otherwise lawfully owned.”</i></p> <p>Article 101 of the Namibian Constitution further states that the principles embodied within the constitution <i>“shall not of and by themselves be legally enforceable by any court but shall nevertheless guide the Government in making and applying laws. ... The courts are entitled to have regard to the said principles in interpreting any laws based on them.”</i></p> <p><i>Ecological sustainability should inform and guide this ECC Application process and the proposed Cleanergy GHDP Project.</i></p> <p>The constitutional recognition of environmental concerns triggered widespread legislative reform relating to the management of natural resources in Namibia. The country’s environmental protection effort is currently comprised of the EMA and its Regulations (2012).</p>	Not Applicable
Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1995)	<p>The purpose of the Policy is seen as: informing decision makers and promoting accountability; ensuring that options and alternatives and environmental costs and benefits are considered; striving for a high degree of public participation and involvement of all sectors; incorporating internationally accepted norms and standards; taking into account secondary and cumulative environmental impacts; promoting the user pays principle; and promoting sustainable development. The Policy requires that all listed policies, programmes and projects, whether initiated by Government or the private sector, be subject to an EIA. Policies, programmes and projects requiring an Environmental Assessment, amongst others, include: structure plans (e.g. land-use plans and policies); rezoning applications; establishment of settlements; power generation facilities with an output of 1 megawatt or more; electrical substations and transmission lines having equipment with an operating voltage in excess of 30 000 volts rms phase-to-phase; afforestation projects; major roads; major pipelines; major canals, aqueducts, river diversions and water transfers; permanent flood control schemes; small scale (formal) water supply schemes; deforestation projects; effluent plants; multinational projects; waste disposal sites; alternate energy programmes; and commercial tourism and recreation facilities (see Appendix B of the Policy).</p> <p>The EIA Policy of 1995 therefore promotes accountability and informed decision making through the requirement of EIAs for listed programmes and projects. As mentioned above, the EIA policy is currently enforced through the EMA and its Regulations (2012).</p> <p><i>The Environmental Assessment Policy for Sustainable Development and Environmental Conservation is applicable to the proposed Cleanergy GHDP Project as listed activities in terms of the EIA Regulations, GNR 30 of 2012 published in terms of the EMA Section 56 are triggered. Please refer to Section Table 3-2 for EMA Listed Activities.</i></p>	Ministry of Environment and Tourism
Environmental Management Act (Act No. 7 of 2007)	The EMA promotes the sustainable management of the environment and the use of natural resources. It establishes principles for decision making on environmental related matters, establishes the Sustainable Development Advisory Council, provides to the appointment of an Environmental Commissioner along with environmental Officers, provides for	Ministry of Environment and Tourism

Legislation	Description and Relevance	Responsible Authority
	<p>the control and assessment of activities that might have a significant impact on the environment, and provides for incidental matters.</p> <p><i>The EIA Regulations, GNR 30 of 2012 published in terms of the EMA Section 56 regulates this proposed project and will be used to conduct a Scoping and Environmental Impact Assessment to obtain an ECC before commencing with the project. Please refer to Section 3.2.1 for EMA Listed Activities.</i></p>	
<p>Water Act (Act No. 54 of 1956) Water Resources Management Act (Act No. 11 of 2013)</p>	<p>The Water Resources Management Act (WRMA) (Act No. 11 of 2013) provides a framework for the management, protection, development, use, and conservation of water resources, for the regulation and monitoring of water services, and incidental matters.</p> <p>Currently the Water Act (Act No. 54 of 1956) is still applicable law. WRMA will become applicable law once the Government publishes a Government Notice in the Government Gazette, confirming the commencement of the new Act.</p> <p>A person may only abstract and use water from a water resource, which exceeds the threshold authorised in terms of a law relating to water resources above a certain threshold, if the person holds a licence issued by the Minister that authorises the abstraction and use of water from that water resource.</p> <p><i>As potable water will be used for the Cleanergy GHDP Project, no abstraction from a water resource will take place. There will also not be any discharge of water back to the environment. Therefore, no licence to abstract or use water resources will be required for the Cleanergy GHDP Project.</i></p> <p>Part 13 of the WRMA deals with Water Pollution Control and the opening section stipulates that “a person may not by any act or omission cause a water resource to be polluted, either directly or indirectly, unless authorised to do so by or under this Act or any other law, and in accordance with that authorisation.”</p> <p><i>The protection of ground and surface water resources should be a priority for the proposed Cleanergy GHDP Project. Possible deterioration of surface and groundwater as a result of accidental spillages concrete during construction, accidental spillages of hazardous substances from construction vehicles and machinery, as well as from hazardous materials storage areas are the main threats to water resources associated with the proposed project.</i></p>	<p>Ministry of Agriculture, Water, and Rural Development</p>
<p>Namibia Water Corporation Act (Act No. 12 of 1997)</p>	<p>The Namibian Water Corporation Act (Act No. 12 of 1997) aims to establish the Namibia Water Corporation Limited; to regulate its powers, duties, and functions; to provide for a more efficient use and control of water resources; and to provide for incidental matters.</p> <p><i>The protection of ground and surface water resources should be a priority for the proposed Cleanergy GHDP Project. Possible deterioration of surface and groundwater as a result of accidental spillages concrete during construction, accidental spillages of hazardous substances from construction vehicles and machinery, as well as from hazardous materials storage areas are the main threats to water resources associated with the proposed project.</i></p>	<p>Ministry of Agriculture, Water, and Rural Development</p>
<p>Nature Conservation Ordinance (No. 4 of 1975) – Nature Conservation Amendment Act (Act No. 5 of 1996)</p>	<p>The Nature Conservation Amendment Act No. 5 of 1996 amends the Nature Conservation Ordinance, 1975, “so as to provide for an economically based system of sustainable management and utilization of game in communal areas; to delete references to representative authorities; and to provide for matters incidental hereto.” Section 73. 1) provides: “No person other than the lawful holder of a permit granted by the local authority shall at any time pick (“pick”, as defined in Section 1 (xxxviii)), includes to cut off, chop off, pick off, take, gather, uproot, damage or destroy) or transport any protected plant: Provided that – (a) the owner a nursery licensed under section 75 may without such permit pick and transport any protected plant cultivated on the premises of such nursery and cause such protected plant to be picked and transported; (b) the owner or lessee of land may on that land without such permit pick the flower of a protected plant for use as a decoration in his home; (c) the owner or lessee of land may without such permit pick a protected plant on that portion of such land – (i)</p>	<p>Ministry of Environment and Tourism</p>

Legislation	Description and Relevance	Responsible Authority
	<p><i>which he needs for cultivated lands, the erection of a building, the construction of a road or airfield or any other development which necessitates the removal of vegetation; or (ii) on which such protected plant has been specially cultivated"</i> (Nature Conservation Ordinance 4 of 1975, Chapter VI INDIGENOUS PLANTS, Picking and transport of protected plants).</p> <p><i>The Proposed Cleanergy GHDP Project Area does not have any major unique habitats, is not in a pristine condition and is heavily impacted by various anthropomorphic activities. However, the gravel plains east of the mobile dune belt are classified as a "biodiversity yellow flag" i.e., habitats or migration routes which are critical for species' survival. This Act and Ordinance will be applicable to the proposed project as a large area of land will be impacted on by the development and needs to be cleared for the development which may include the need to remove protected and endangered species as well as invasive species. In accordance with this, a biodiversity impact assessment will be conducted as part of the specialist studies.</i></p>	
Forest Act (Act No. 12 of 2001)	<p>The Act "provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating to the management and use of forests and forest produce; to provide for the protection of the environment and the control and management of forest fires; to repeal the Preservation of Bees and Honey Proclamation, 1923 (Proclamation No.1 of 1923), Preservation of Trees and Forests Ordinance, 1952 (Ordinance No. 37 of 1952) and the Forest Act, 1968 (Act No. 72 of 1968); and to deal with incidental matters." Section 22. (1) provides: "Unless otherwise authorised by this Act, or by a licence issued under subsection (3), no person shall on any land which is not part of a surveyed erven of a local authority area as defined in section 1 of the Local Authorities Act, 1992 (Act No. 23 of 1992) cut, destroy or remove - (a) vegetation which is on a sand dune or drifting sand or on a gully unless the cutting, destruction or removal is done for the purpose of stabilising the sand or gully; or (b) any living tree, bush or shrub growing within 100 metres of a river, stream or watercourse."</p> <p><i>The Proposed Cleanergy GHDP Project Area does not have any major unique habitats, is not in a pristine condition and is heavily impacted by various anthropomorphic activities. However, the gravel plains east of the mobile dune belt are classified as a "biodiversity yellow flag" i.e., habitats or migration routes which are critical for species' survival. This Act and Ordinance will be applicable to the proposed project as a large area of land will be impacted on by the development and needs to be cleared for the development which may include the need to remove protected and endangered species as well as invasive species. In accordance with this, a biodiversity impact assessment will be conducted as part of the specialist studies.</i></p>	Ministry of Environment and Tourism
Civil Aviation Act (Act No. 6 of 2016)	<p>The Civil Aviation Act, Act No 6 of 2016 was brought into force on 1 November 2016 and was published in GG 6047. This act consolidates laws relating to civil aviation and related offences, provides powers and functions of the Minister, establishes the Namibia Civil Aviation Authority including its powers and functions, establishes the Air Navigation Services, provides for a civil aviation regulatory and control framework for the safety and security of civil aviation to ensure the implementation of international agreements, establishes the Directorate of Aircraft Accident and Incident Investigations with its powers and functions, establishes the Namibia Register of Aircraft and the Civil Aviation Registry, repeals civil aviation and offence laws, and provides for incidental matters.</p> <p>The Namibian Civil Aviation Regulations was published in terms of the Civil Aviation Act in 2001 (GG 2467). These regulations were amended twice in 2006, once in 2017, twice in 2018, once in 2019, and twice in 2020.</p> <p><i>This Act with its regulations may be applicable to the project as solar panels will be installed and the project area is located in close proximity to the Walvis Bay International Airport. A visual impact assessment will be undertaken as part of the EIA to assess the potential impacts associated with the PV plant location in relation to the Walvis Bay Airport. Light reflection</i></p>	Ministry of Works and Transport

Legislation	Description and Relevance	Responsible Authority
	<i>from the solar array may further impact on aeronautical users, particularly flights on approach and departure from the Walvis Bay Airport.</i>	
National Heritage Act (Act No. 27 of 2004)	<p>This Act provides for, inter alia, the protection and conservation of places and objects of heritage significance. A National Heritage Council has been established to identify, conserve, manage, and protect places and objects of heritage significance.</p> <p>Permits are required for the removal, damage, alteration or excavation of heritage sites or remains. Any person who discovers an archaeological site should notify the National Heritage Council. These aspects could be relevant during the construction activities of the proposed project and will require to be assessed.</p> <p><i>Potential deterioration of cultural artefacts within the proposed footprint of the project area. Construction activities may overturn currently unidentified historical artefacts. A heritage and archaeological impact assessment will be conducted as part of the EIA Phase of the project. Any heritage resources (e.g., human remains, artefacts etc.) discovered during the Construction Phase of the project will require a permit from the National Heritage Council (NHC) for relocation.</i></p>	Ministry of Environment and Tourism
Burial Place Ordinance 27 of 1966	<p>Burial Place ordinance 27 of 1966 prohibits the desecration or disturbance of graves and regulates how bodies may be unearthed or dug up.</p> <p><i>A heritage and archaeological impact assessment will be conducted as part of the EIA Phase of the project. Any heritage resources (e.g., human remains, artefacts etc.) discovered during the Construction Phase of the project will require a permit from the NHC for relocation.</i></p>	Ministry of Environment and Tourism
National Monuments Act (Act No. 28 of 1969)	<p>This Act establishes a National Monuments Council and provides for the preservation of certain property as National Monuments and the maintenance of certain burial grounds.</p> <p><i>No property of National importance is located within the project footprint area.</i></p>	Ministry of Environment and Tourism
Soil Conservation Act (Act No. 76 of 1969)	<p>The purpose of this Act is “to consolidate and amend the law relating to the combating and prevention of soil erosion, the conservation, improvement and manner of use of the soil and vegetation and the protection of the water sources in the Republic and the territory of South-West Africa; and to provide for matters incidental thereto.”</p> <p><i>Cognizance is to be taken in identifying potential impacts on soil, vegetation, water supply sources and resources by following the hierarchy of environmental impact mitigation i.e., avoid, then minimise, then restore impacted areas and finally offset any impacts that remain.</i></p>	Ministry of Agriculture, Water, and Rural Development
Hazardous Substances Ordinance 14 of 1974	<p>The Hazardous Substances Ordinance 14 of 1974 provide for the control of toxic substances which may result in injury, ill health or death of human beings.</p> <p><i>Storage and handling of various hazardous chemicals. Hydrogen will be produced which is a combustible fuel. Facilities for the storage and handling of dangerous goods including the storage of hydrogen.</i></p>	Ministry of Health and Social Services
Atmospheric Pollution Prevention Ordinance 11 of 1976	<p>The Atmospheric Pollution Prevention Ordinance, 11 of 1976 (GG 3555) came into force on 18 August 1976. This Ordinance provides for the prevention of the pollution of the atmosphere and for related incidental matters.</p> <p><i>Potential deterioration of air quality due to the generation and dispersion of dust caused by construction activities.</i></p>	Ministry of Health and Social Services
Labour Act (Act No. 11 of 2007)	<p>The Labour Act, Act No 11 of 2007 (GG 3971) was enforced on 1 March 2009 and was amended by Act No 2 in 2012 (GG 4925). This Act consolidates and amends the labour law, establishes a comprehensive labour law, entrenches fundamental labour rights and protections, regulates basic employment terms and conditions, ensures the safety, health, and welfare of employees, protects employees from unfair labour practices, regulates trade union and employer</p>	Ministry of Labour, Industrial Relations

Legislation	Description and Relevance	Responsible Authority
	<p>organisation registrations, regulates collective labour relations, provides for systematic prevention and resolution of labour disputes, establishes the Labour Advisory Council, the Labour Court, the Wages Commission and the labour inspectorate, provides for the appointment of the Labour Commissioner and Deputy Labour Commissioner, and provides for incidental matters.</p> <p><i>Cleanergy should ensure that all contractors involved during the Construction, Operation and Maintenance Phases of the Cleanergy GHDP Project comply with the provisions of these legal instruments.</i></p>	and Employment Creation
Public and Environmental Health Act (Act No. 1 of 2015)	<p>The Public and Environmental Health Act, Act No 1 of 2015 was published in GG 5740 and brought into force on 17 September 2020. This Act provides a framework for a structured uniform public and environmental health system in Namibia. It also provides for incidental matters. The Public Health Covid-19 General Regulations, GNR 91 of 2021 (GG 7522) was published in terms of the Public and Environmental Health Act and was repealed numerous times in 2021 and 2022.</p> <p><i>Cleanergy should ensure that all contractors involved during the Construction, Operation and Maintenance Phases of the Cleanergy GHDP Project comply with the provisions of these legal instruments.</i></p>	Ministry of Health and Social Services
Regulations relating to the health and safety of employees at work (GN 156 of 1997)	<p>These Regulations establish health and safety regulations for the workplace.</p> <p><i>Cleanergy should ensure that all contractors involved during the Construction, Operation and Maintenance Phases of the Cleanergy GHDP Project comply with the provisions of these legal instruments.</i></p>	Ministry of Health and Social Services
Urban and Regional Planning Act (Act No. 5 of 2018)	<p>The Urban and Regional Planning Act, Act No 5 of 2018 (GG 6631) came into force on 3 September 2020 and aims to consolidate laws relating to urban and regional planning, provide the legal framework for spatial planning, provide principles and standards of spatial planning, establish the regional and urban planning board, decentralise matters relating to spatial planning, prepare, approve, and review the national spatial development framework, regional structure plans, and urban structure plans, prepares, approves, reviews, and amendments zoning schemes, establish townships, alter boundaries of approved townships, disestablishment of approved townships, change names of approved townships, subdivide and consolidate land, alter, suspend, and delete conditions relating to land, and provide for incidental matters.</p> <p>Regulations relating to Urban and Regional Planning (GG 223) of 2020 (GG 7327) were published in terms of the Urban and Regional Planning Act Section 131.</p> <p><i>Area zoned as Heavy Industrial Area.</i></p>	Ministry of Urban-Rural Development
Roads Ordinance 17 of 1972	<p>The Roads Ordinance, 17 of 1972 (OG 3268) was brought into force on 1 January 1973 and was amended in 1973 (twice), 1974, 1975, 1979, 1980, 1984, 1986, and 1993. This Ordinance consolidates and amends laws relating to roads and incidental matters:</p> <ul style="list-style-type: none"> • Reserve boundaries (S3.1); • Control of traffic on urban trunk and main roads (S27.1); • Rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads (S36.1); • Infringements and obstructions on and interference with proclaimed roads. (S37.1); and • Distance from proclaimed roads at which fences are erected (S38). <p><i>The limitations applicable to the Roads ordinance on proclaimed roads should inform the proposed layout and zonings where applicable.</i></p>	Ministry of Works and Transport

Legislation	Description and Relevance	Responsible Authority
Walvis Bay Town Planning Scheme	This statutory document provides land use regulations and development. <i>Land uses and developments associated with the proposed Cleanergy GHDP Project, should be in accordance with the Town Planning Scheme.</i>	Walvis Bay Municipality
Integrated Urban Spatial Development Framework (IUSDF) of Walvis Bay	Provides future land use planning within the Walvis Bay district. <i>The IUSDF was utilized to see if the proposed activity is in accordance with the future planning of Walvis Bay.</i>	Walvis Bay Municipality
Walvis Bay Climate Strategic Action Plan	Provides action plans on how Town Planning can help mitigate Climate Change. To promote two-storey developments, reduce urban sprawl and land competition. Encourage EIA studies with regards to rezoning. <i>Area zoned as Heavy Industrial Area.</i>	Walvis Bay Municipality
Walvis Bay Biodiversity Report of 2008 (WBBR, 2008)	Provides a comprehensive summary and map of sensitive Biodiversity Areas and Zoning in the Walvis Bay district. <i>To ensure that the proposed activity is not located close to any Biodiversity Area or Zoning.</i>	Walvis Bay Municipality
Sustainable Urban Energy Planning: A handbook for cities and towns in developing countries (SUEP, 2004)	Provides a comprehensive list and case studies to implement energy saving measures. <i>Implementing energy-efficiency and carbon mitigation measures. Conserve natural resources with city planning.</i>	Walvis Bay Municipality

3.2.1 EMA Listed Activities and Description

Table 3-2 provides a summary of the proposed listed activities triggered in terms of the EIA Regulations.

Table 3-2: Detailed Description of the Proposed Listed Activities

Proposed Listed Activities	Description and Relevance
Energy generation, transmission, and storage	
1. The construction of facilities for – (a) the generation of electricity.	Construction and operation of a 5 MW _p demonstration solar PV power plant, including a battery storage facility, powering a 5 MW electrolyser allowing for the production of green hydrogen.
Waste management, treatment, handling, and disposal activities	
2.1. The construction of facilities for waste sites, treatment of waste and disposal of waste.	The construction of a wastewater collection system comprising of a conventional gravity system and conservancy tanks.
Hazardous substance treatment, handling, and storage	
9.1. The manufacturing, storage, handling, or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.	Storage and handling of various hazardous chemicals. Hydrogen will be produced which is a combustible fuel.
9.4. The storage and handling of a dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.	Facilities for the storage and handling of dangerous goods including the storage of hydrogen.
9.5. Construction of filling stations or any other facility for the underground or aboveground.	Construction and operation of a hydrogen filling station.
Infrastructure	
10.1. The construction of – (a) oil, water, gas, and petrochemical and other bulk supply pipelines. (b) public roads.	The project will require the construction of: <ul style="list-style-type: none"> • Access road(s) to site; and • Water supply pipeline from closest NamWater connection point.

3.2.2 Other Key Relevant Namibian Policies

Policies provide the framework to applicable legislation and are used to provide support to legal interpretation or guidance regarding the implementation of governmental objectives. Relevant policies not mentioned before applicable to the proposed Cleanergy GHDP Project include, but is not limited to:

- Environment:
 - 2nd National Biodiversity Strategy and Action Plan NBSAP2 (2013-2022);
 - Policy for Prospecting and Mining in Protected Areas (2018);
 - Access and Benefit Sharing Act (2017);
 - Environmental Assessment Policy (1995);
 - Land Use Planning towards Sustainable Development Policy (1994);
 - Draft Pollution Control and Waste Management Bill (1999); and
 - Nature Conservation Ordinance 4 of 1975.
- Water:

- Water Resources Management Act (2004 and revised 2013);
- Namibia's integrated Water Resources Management (IWRM) plan (2010);
- Water and Sanitation Policy (2008);
- Namibia's Draft Wetland Policy (2004); and
- National Water Policy White Paper (2000).
- Planning:
 - National Development Plan 5 and Vision 2030;
 - Fifth National Development Plan (2017);
 - National Integrated Resource Plan (2016);
 - Harambee Prosperity Plan (2016);
 - Vision 2030 (2004);
 - Regional Poverty Reduction Action Programme (2003); and
 - Regional Planning and Development Policy (1997).
- Forestry, Parks and Wildlife:
 - National Policy on Human Wildlife Conflict Management (2011);
 - Forestry Development Policy (1998);
 - Amendment to the 1975 Nature Conservation Ordinance (1996);
 - Wildlife management, Utilization and Tourism in Communal Areas Policy (1995);
 - Promotion of Community Based Tourism Policy (1995);
 - Policy for the Conservation of Biotic Diversity and Habitat Protection (1994); and
 - National Forest Policy (1992).
- Land:
 - National Agricultural Policy (2015);
 - Land Degradation Neutrality Report (2015);
 - National Industrial Policy (2012);
 - Communal Land Reform Act (2002);
 - National Land Tenure Policy (2005);
 - Land Tax and Communal land Reform Act (2002);
 - National Resettlement Policy (2001);
 - National Land Policy (1998);
 - National Land Policy, the National Resettlement Policy, The Agricultural (Commercial) Land Reform Act (1995); and
 - Commercial Land Reform Act (1995).
- Energy:
 - National Energy Policy (2017); and

- White Paper Policy on Energy (1998).
- Disaster risk management:
 - The Windhoek Declaration for Enhancing Resilience to Drought in Africa (2016); and
 - National Policy for Disaster Risk Management (2009).
- Climate change:
 - Intended Nationally Determined Contributions of The Republic of Namibia to the United Nations Framework Convention on Climate Change (2015);
 - National Climate Change Strategy and Action Plan (2013); and
 - National Policy on Climate Change for Namibia (2011).
- Tourism:
 - National Tourism Growth and promotion Strategy (MET, 2016);
 - National Policy on Tourism for Namibia (2008);
 - National Policy on Tourism for Namibia (2008);
 - Community Based Tourism Policy (1995); and
 - The Tourism White Paper (1994).
- Local Authorities:
 - Public and Environmental Health Act (Act No.1 of 2015); and
 - Local Authority Act (Act No. 23 of 1992)

3.2.3 International Conventions

Relevant international conventions and protocols to which Namibia is a signatory include:

- The Kyoto Protocol on United Nations (UN) climate change (ratified in 2020);
- Basel Convention on the control of trans boundary movements of hazardous wastes and their disposal (1992);
- Ramsar (wetlands) Convention (ratified in 2001);
- Convention for the Safeguarding of the Intangible Cultural Heritage Paris, 17 October 2003 (Ratification in Nigeria 2005);
- Convention of International Trade in Endangered Species of 1973;
- Convention of Biological Diversity, 1992;
- The Convention on International Trade in Endangered Species (CITES) of 1973;
- Convention Concerning the Protection of the World Cultural and Natural Heritage. Paris, 16 November 1972 (Ratification in Nigeria 1974);
- United Nations Convention to Combat Desertification (ratified in 1997);
- National Rangeland Management Policy and Strategy of 2012;
- National Biodiversity Strategy and Action Plan 1 and 2 (Draft);
- Vienna Convention for the protection of the ozone layer (1985);

- Montreal Protocol on Substances that Deplete the Ozone Layer (1987) (Ratification in Nigeria 1988);
- United Nations Convention on Biological Diversity (UNCBD);
- Equator Principles;
- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) 2007; and
- The International Labour Organisation (ILO) Eight Fundamental Conventions, consisting of the following:
 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
 - Forced Labour Convention, 1930 (No. 29), and its 2014 protocol;
 - Abolition of Forced Labour Convention, 1957 (No. 105);
 - Minimum Age Convention, 1973 (No. 138);
 - Worst Forms of Child Labour Convention, 1999 (No. 182);
 - Equal Remuneration Convention, 1951 (No. 100); and
 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

Many of these are incorporated into the various World Bank Operational Procedures and the International Finance Corporation (IFC) Performance Standards (PS). So, by conforming to these two sets of standards, the EIA will comply with the requirements of the relevant international protocols and conventions.

3.2.4 International Finance Corporation Performance Standards

The IFC PSs on Environmental and Social Sustainability, which were published in January 2012, are recognised as being the most comprehensive standards available to international finance institutions working within the private sector. The principles provide a framework for an accepted international approach to the management of social and environmental issues. Table 2-11 summarises the eight (8) different IFC PS and applicability that will apply to the EIA.

PS1 thus establishes the importance of (i) integrated assessment to identify the environmental and social impacts, risks, and opportunities of projects; (ii) effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and (iii) the client's management of environmental and social performance throughout the life of the project. IFC PS's 2 through 8 present requirements to avoid, reduce, mitigate, or compensate for impacts on people and the environment, and to improve conditions where appropriate. Where social or environmental impacts are anticipated, the client is required to manage them through its Environmental Management System consistent with PS1.

Table 3-3: Summary of International Finance Corporation Performance Standards and how they will be addressed

IFC PS	Objectives	How this EIA addresses it
Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts	<p>PS 1 underscores the importance of managing environmental and social performance throughout the life of a project. PS 1 requires the client to conduct a process of environmental and social assessment and to establish and maintain an Environmental and Social Management System (ESMS), appropriate to the nature and scale of the project and commensurate with the level of its environmental and social risks and impacts. PS1 aims to:</p> <ul style="list-style-type: none"> • Identify and evaluate environmental and social risks and impacts of the project⁴ ; • Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate/offset for risks and impacts to workers, affected communities, and the environment; • Promote improved environmental and social performance of clients through the effective use of management systems; • Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately; • Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them; and • Ensure that relevant environmental and social information is disclosed and disseminated. 	<p>In order to comply with the IFC requirements of PS 1 for the effective management of grievances and PPP for the proposed project, a number of site-specific management plans including but not limited to, PPP, grievance redress mechanism, traffic management will be incorporated in the EIA. Where sufficient detail for a site-specific management plan is not available, a framework will be included, to provide a basis for the development of a site-specific management plan (e.g., waste, water).</p>
Performance Standard 2: Labour and Working Conditions	<p>PS 2 recognises that the pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers. PS2 aims to:</p> <ul style="list-style-type: none"> • Promote fair treatment, non-discrimination and equal opportunity of workers; • Establish, maintain and improve the worker-management relationship; • Promote compliance with national employment and labour laws; 	<p>The need to protect the rights of workers involved in the GHDP Project is triggered by PS2. The EIA will address the impacts related to the employment of locals and identifies mitigation measures that will be implemented by Cleanergy to safeguard the rights of its workers and ensure safe and healthy working conditions.</p>

⁴ This includes cumulative impacts. The IFC's Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets, published in 2013 provides guidance.

IFC PS	Objectives	How this EIA addresses it
	<ul style="list-style-type: none"> • Protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties and workers in the client's supply chain; and • Promote safe and healthy working conditions and the health of workers; and avoid the use of forced labour. 	
Performance Standard 3: Resource Efficiency and Pollution Prevention	PS 3 recognises that increased economic activity and urbanisation often generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional, and global levels. Thus, PS3 aims to: <ul style="list-style-type: none"> • Avoid or minimise pollution from project activities; • Promote more sustainable use of resources (including energy and water); and • Reduce project-related Greenhouse Gas (GHG) emissions. 	The EIA will include an assessment of the risk of pollution and includes mitigation measures that will be aimed minimisation of pollution. The requirements of PS 3 on pollution management are addressed in the air quality monitoring plan and waste and water quality management frameworks. Complying with the mitigation measures in the Environmental and Social Management and Monitoring Plan and relevant management plans will ensure that negative environmental impact is avoided and/or reduced and the positive impacts are enhanced.
Performance Standard 4: Community Health, Safety, and Security	PS 4 recognises that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. PS4 aims to: <ul style="list-style-type: none"> • Anticipate and avoid adverse impacts on the health and safety of affected communities during the project life from both routine and non-routine circumstances; and • Ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimises risks to the affected communities. 	The EIA will include an assessment of the potential health and safety impacts that may occur due to the Cleanergy GHDP Project. The EMP will include health and safety training for contractors and workers. A safety risk assessment will be undertaken as part of the EIA to make recommendations to minimise safety risks from the new hydrogen storage facilities to surrounding communities. Noise, air quality, traffic and water studies, as well as the social impact assessment, will take community health and safety into account in the assessment of impacts.
Performance Standard 5: Land Acquisition and Involuntary Resettlement	PS 5 recognises that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. PS5 thus aims to: <ul style="list-style-type: none"> • Avoid, and when avoidance is not possible, minimise displacement by exploring alternative project designs; • Avoid forced eviction; • Anticipate and avoid, or where avoidance is not possible, minimise adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation and the informed participation of those affected; and • Improve, or restore, the livelihoods and standards of living of displaced persons. 	The EIA will include a socio-economic impact assessment as part of the EMP actions, where the impacts (negative and positive) of the proposed project on the communities around the project will need to be assessed. No resettlement activities will be required for the proposed Cleanergy GHDP Project.

IFC PS	Objectives	How this EIA addresses it
<p>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>	<p>PS 6 recognises that protecting and conserving biodiversity, maintaining ecosystem services, and sustainably managing living natural resources are fundamental to sustainable development. PS6 aims to:</p> <ul style="list-style-type: none"> • Protect and conserve biodiversity; • Maintain the benefits from ecosystem services; and • Promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities. 	<p>The EIA will include a biodiversity assessment undertaken by a specialist, which will provide a description of the biodiversity in the affected area. The assessment identifies any biodiversity of importance such as Red List listed species requiring special protection. The assessment includes the identification of the project's potential impacts on biodiversity and an assessment of the significance of the identified impacts. Mitigation measures will be identified and included in the Biodiversity Management Plan that is to be included in the project's EMP.</p>
<p>Performance Standard 7: Indigenous Peoples</p>	<p>PS 7 recognises that Indigenous Peoples, as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalised and vulnerable segments of the population. PS7 thus aims to:</p> <ul style="list-style-type: none"> • Ensure that the development process fosters full respect for human rights, dignity, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples; • Anticipate and avoid adverse impacts of projects on communities of Indigenous Peoples, or when avoidance is not possible, to minimise and/or compensate for such impacts; • Promote sustainable development benefits and opportunities for Indigenous Peoples in a culturally appropriate manner; • Establish and maintain an ongoing relationship based on informed consultation and participation with the Indigenous Peoples affected by a project throughout the project's life cycle; • Ensure the Free, Prior and Informed Consent of the affected communities of Indigenous Peoples when the circumstances described in this Performance Standard are present; and • Respect and preserve the culture, knowledge, and practices of Indigenous Peoples. 	<p>No recognized Indigenous Peoples are impacted in this project, hence PS7 is not triggered.</p>
<p>Performance Standard 8: Cultural Heritage</p>	<p>PS 8 recognises the importance of cultural heritage for current and future generations. As such, PS8 aims to:</p> <ul style="list-style-type: none"> • Protect cultural heritage from the adverse impacts of project activities and support its preservation; and • Promote the equitable sharing of benefits from the use of cultural heritage. 	<p>The EIA will include a specialist Cultural and Heritage Impact Assessment which entails the identification of existing cultural and heritage resources that may be affected by the proposed project. Mitigation measures aimed at minimising the significance of potential impacts on cultural and heritage resources will be included in the EMP.</p>

4 Description of Proposed Project

4.1 Proponent

As mentioned previously, in 2021, a joint venture was established between the Ohlthaver & List Group of Companies (Namibia's largest privately held group of companies) and CMB.TECH (a Belgian owned company working towards the development of large marine and industrial applications for hydrogen). The joint venture, Cleanergy Solutions Namibia (Pty) Ltd, aims to be the first company in Namibia to produce commercial grade hydrogen from water, utilising renewable energy sources.

Table 4-1 provides the details of the Proponent and facility owner's representative.

Table 4-1: Proponent Contact Details

Contact details of the Proponent:
<p>Company: Cleanergy Solutions Namibia (Pty) Ltd Physical Address: 23-33 Fidel Castro Street, Windhoek, Namibia Contact Person: Eike Krafft Tel: +264 61 207 5224 / +264 81 143 6373 E mail: eike.krafft@ol.na</p>

4.2 Project Overview

Cleanergy is proposing to construct a 5 MW GHDP in Walvis Bay, Namibia. The total size of the plant will be approximately 26 ha and the extent of the different project components are as follows:

- Solar PV plant with an output of 5 MW_p, with tracker configuration covering an area of 15 ha;
- A 5 MW PEM electrolyser (electrolyser systems with a capacity of producing 90 kg of hydrogen per hour. This system will be installed in two 40 feet (12.192 m long x 2.438 m wide x 2.591 m high) containers;
- One hydrogen generation Alkaline electrolyser system with a capacity of 100-300 KW/2-6 kg/h. This system will be installed in a 20 feet container (5.898 m long x 2.352 m wide x 2.393 m high);
- Compressor(s) with a combined capacity of 135 kg/h (1500 Nm³/h) at 40 bar inlet pressure to densify the hydrogen gas for storage. The compressors will be installed in three (3) 10 feet containers;
- Hydrogen buffer and storage tanks:
 - Low pressure hydrogen buffer tank at 40 bar with a volume of 40 m³;
 - Medium pressure hydrogen storage tank at 300 bar; and
 - High pressure hydrogen buffer storage tank at 500 bar for distributing hydrogen for refuelling heavy duty vehicles and filling MEGC trailers;
- Hydrogen fuelling station covering an area of approximately 335 m²; and
- Information centre/building covering an area of approximately 2 605 m².

The following secondary infrastructure will also be required:

- Access road of approximately 280 meters covering and area of approximately 4 364 m²;
- Water connection (pipeline connecting to main NamWater supply), with a length of approximately 3 392 m; and

- Grid connection (ErongoRed).

It should be noted that the grid connection will also require an ECC, but the process will be managed outside the scope of this process.

The demonstration project will be started at a 5 MW scale to:

- Evaluate the efficiency of current available technology within the Namibian context;
- Develop the required skills and competencies locally to operate and maintain the demonstration and possible commercial plant, as well as to share the necessary knowledge to allow for the conversion of existing equipment to allow for the utilisation of hydrogen as a fuel; and
- Develop an offtake for the green hydrogen locally (thus providing additional benefit to the country) to ensure multiple markets for the final product e.g., by converting heavy vehicles used in mining and within the port area to dual fuel vehicles.

One of the critical components of the demonstration plant will be the training centre, with course content being developed along with local vocational training and academic institutions, in order to ensure that the long-term staffing needs of the pilot and commercial facilities can be met. Cleanergy thus wants to commence with the construction of the training centre as soon as possible, in order to ensure that the necessary skills and competencies become available.

Please refer to Figure 4-1 for an illustration of the Cleanergy GHDP Project.

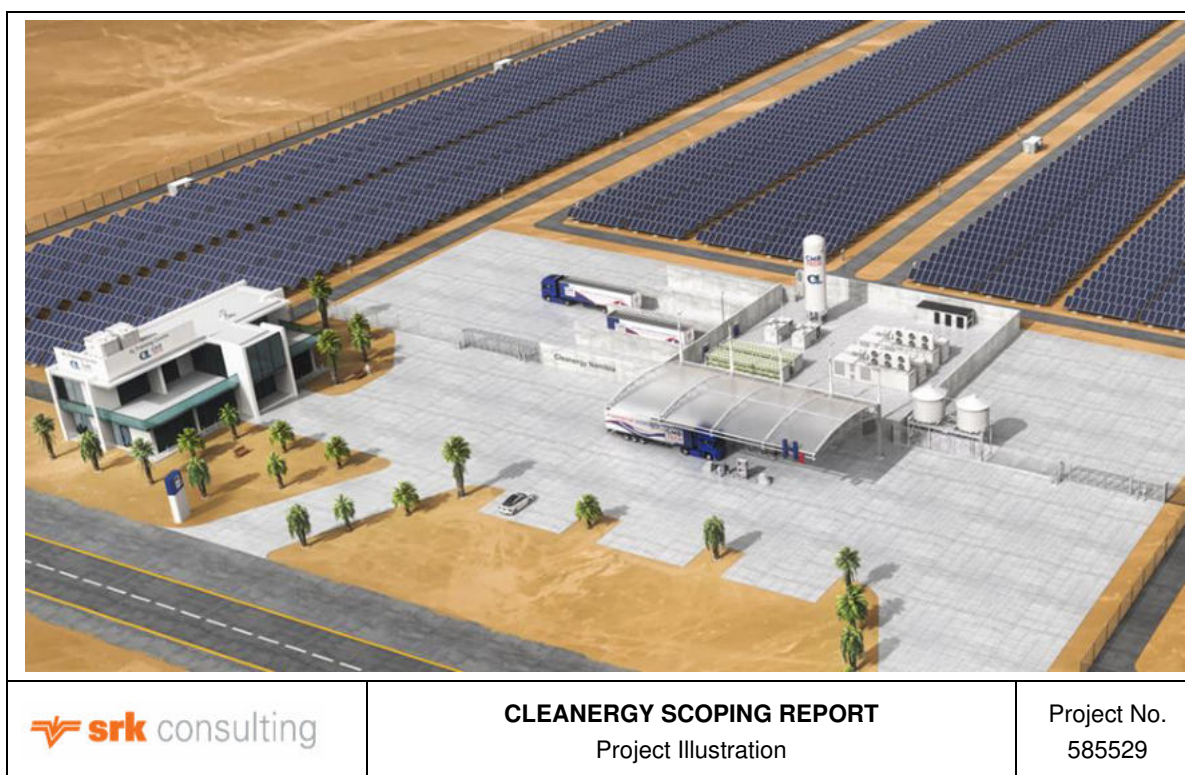


Figure 4-1: Project Illustration

4.3 Project Location

The project will be located on farm 58, Walvis Bay in the New Industrial Zone near the Walvis Bay International Airport and Dune 7 (inland to the Dune), to the East of the new Walvis Bay-Swakopmund highway (D1984). The total size of the plant will be approximately 26 ha (Figure 4-2) covering approximately 12% of Portion 8 of farm 58.

The proposed project is located on the erf numbers as illustrated in Table 4-2 and Figure 4-3 provides a description of the affected properties.

Table 4-2: List of Affected Properties and Property Portions

Physical Address	Owner	Portion
Farm No. 58, Walvis Bay, Namibia	Walvis Bay Municipality	Portion 8

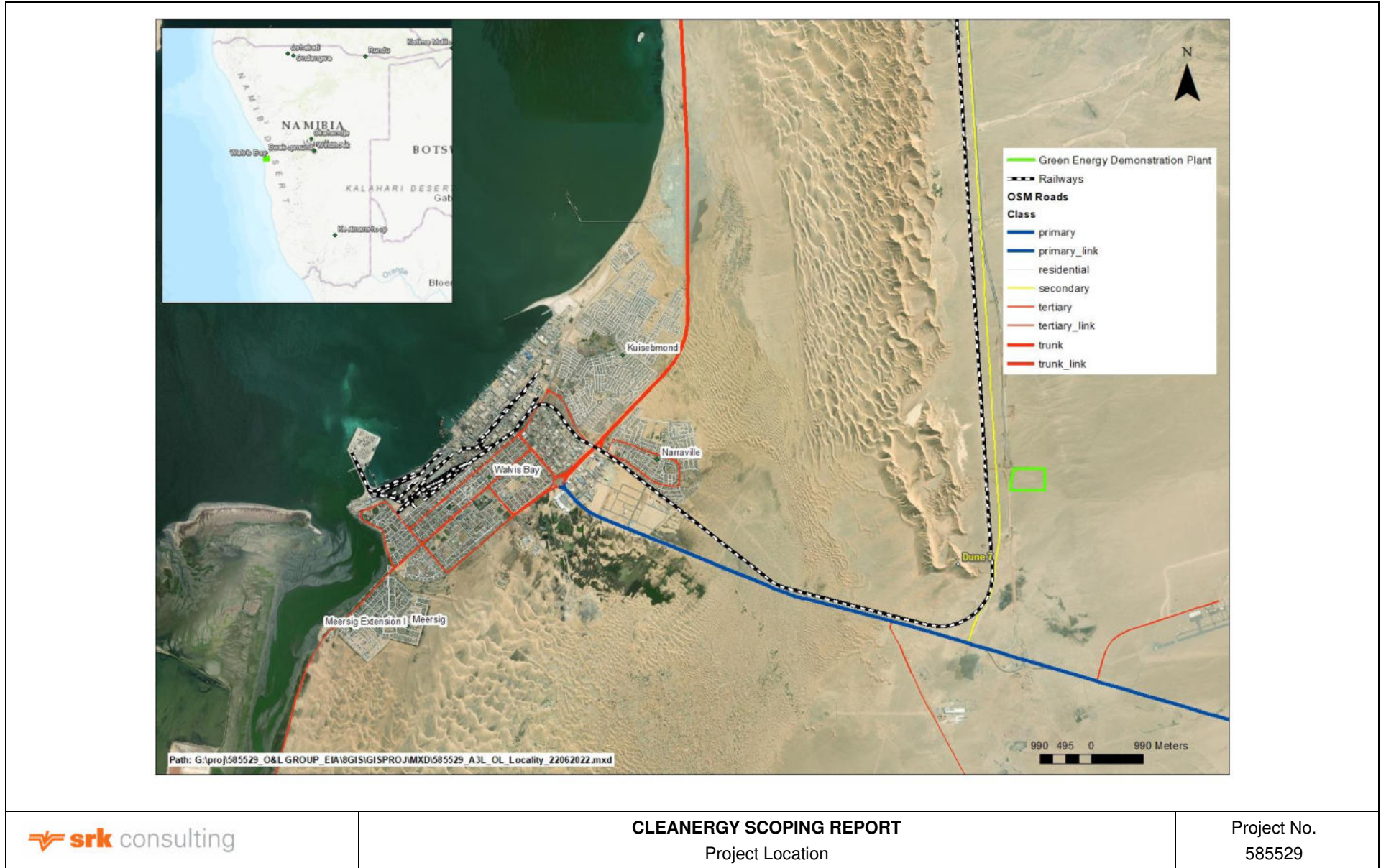


Figure 4-2: Project Location

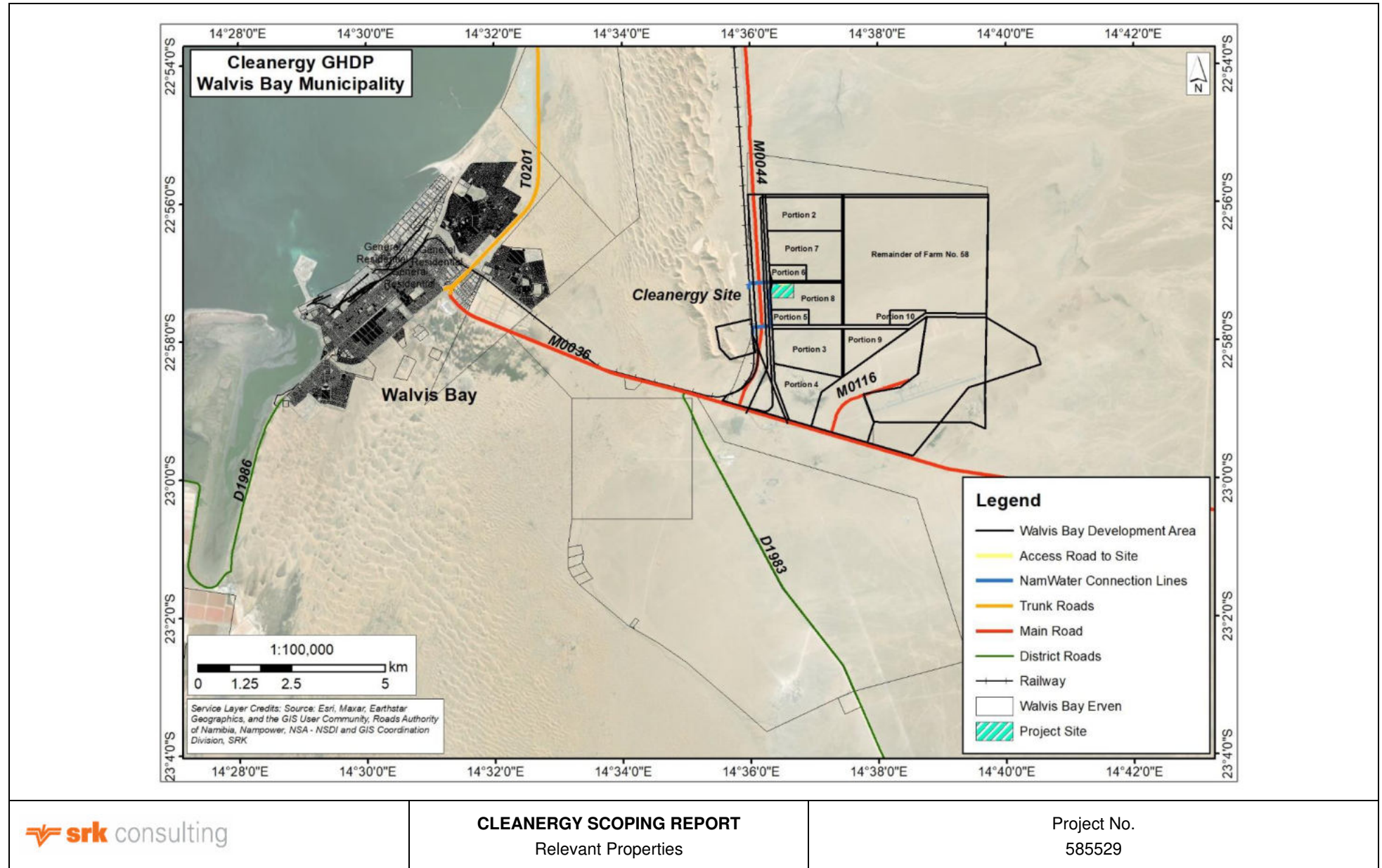


Figure 4-3: Relevant Properties

4.4 Schedule and Life of Project

Whilst the solar PV plant itself will have an anticipated life cycle of 25 years, the GHDP will only be in operation for as long as it is feasible.

4.5 Project Components

4.5.1 Solar Photovoltaic Plant

The solar PV plant technology as considered by Cleanergy is a high-quality, single axis, horizontal tracking, bifacial photovoltaic power plant. The power plant will be fully designed according to local and international standards. This includes Tier 1 bifacial PV modules, inverters as well as a high-quality tracking system specifically selected to withstand the local environment conditions close to the coast. Furthermore, a fully integrated monitoring system as well as a weather station will be installed for optimal plant performance and monitoring, forecasting and downtime control.

Key equipment technologies associated with the solar PV plant are described below.

Bifacial PV Modules

Cleanergy is proposing to utilize crystalline module technology due to its bankability and reliability. Compared to thin film technology, crystalline modules build up the major share (close to 90%) of all 177 GW installed PV capacity worldwide. Monocrystalline technology has a proven operational track record over the last four decades and power degradation values are well known. Therefore, the long-term performance bares significantly less risk than with the much younger thin film technology.

Based on the strong increase of bifacial installation in the last couple of years, we consider the advantages of bifacial monocrystalline modules for the respective PV Plants. Bifacial modules are further developed crystalline silicon modules, which are active on the front and the rear side. Due to ground reflection of radiation, they additionally use the light on the back side. The higher the albedo, the more irradiance reaches the rear surface of the module and the more the yield increases. CRONIMET is working with Tier 1 supplier companies for highest reliability and guarantees. The PV modules standard is a 10-year limited product warranty and a 30-year peak power warranty. Figure 4-8 indicates a typical module from Canadian Solar.

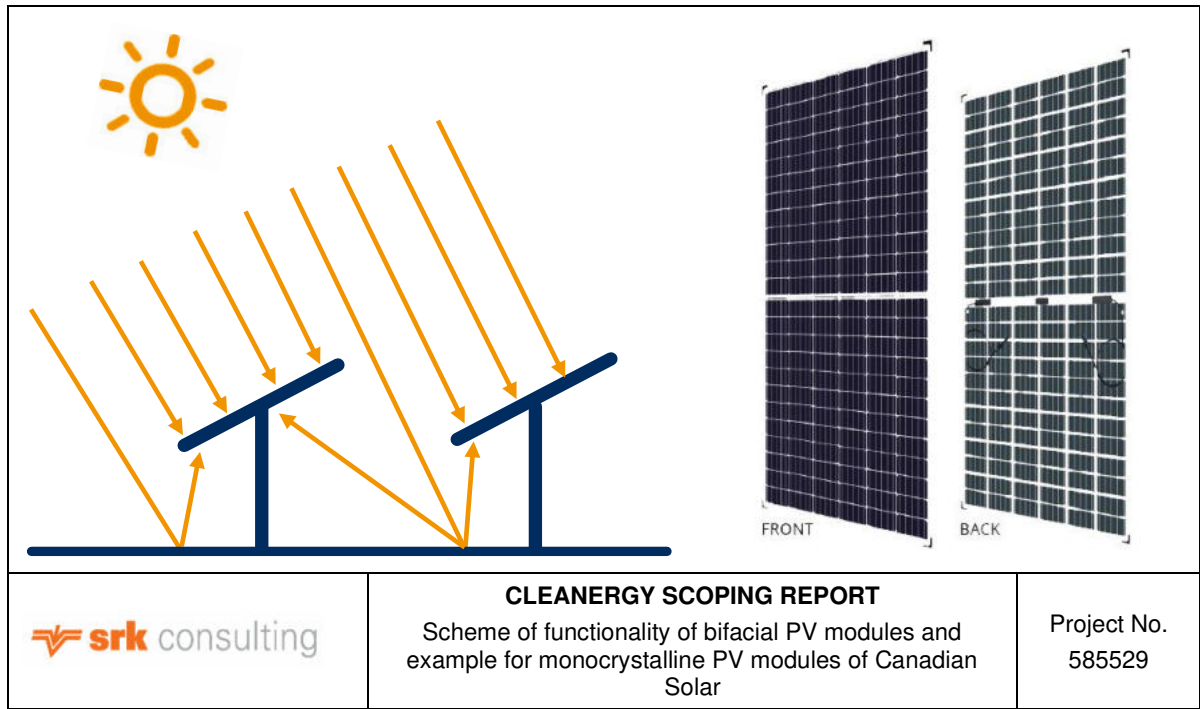


Figure 4-4: Scheme of functionality of bifacial PV modules and example for monocrystalline PV modules of Canadian Solar

Inverters

For the inverters, Cleanergy is proposing decentralized Tier 1 inverters for the power plant. The following figure shows decentralized inverter solutions from the top tier suppliers such as Huawei to guarantee highest performance and energy output combined with its high reliability which ensures minimum downtime and low O&M costs. The inverters come with a standard 5-year factory warranty. Our proposed inverter is the Huawei SUN2000 215kTL as illustrated in Figure 4-5 which has been in operation in some of the extreme conditions at our plants in Namibia.



Figure 4-5: Decentralised 215 kW Inverter from Huawei

Photovoltaic Tracking System

As there are no constrains in available area and shape, Cleanergy proposes a single axis PV tracking solution (Figure 4-6). The PV Power Plant’s electrical output increases as the system upgrades from the fixed tilt to single tracking system and with only marginal onetime capex and yearly operating and maintenance cost increases. Depending on the site and precise characteristics of the solar irradiation, bi-facial trackers may increase the annual energy yield by up to 20% for single-axis tracker as it can be seen in the table below. Cleanergy proposes to utilize the Schletter Single Axis Tracking system designed specifically for this Class 4 environmental corrosion conditions. Cleanergy have also procured and installed trackers from major suppliers like Exosun and Lumax. Beforementioned suppliers offer very durable solutions, and long warranty periods.



Figure 4-6: Example for Bifacial Horizontal Tracking System

Summary of Components Data

Table 4-3 summarises the offered Power Plant information data and its equipment data and ratings.

Table 4-3: GHDP PV Plant Technical Specifications

Technical Specifications of the PV Plant	
Plant Data	
Module Technology	Bifacial polycrystalline
Inverter Topology	Decentralized
Racking System	Horizontal Bifacial Single Axis, East-West Tracking
PV Module Data	
Supplier	Canadian Solar or Similar (Tier One)
Type	CS3U-370MB
Nominal Power	520 Wp
Efficiency	20.2 %
Warranty	10 years product warranty 30 years peak power warranty

Inverter Data	
Supplier	Huawei or Similar (Tier One)
Type	SUN2000 110kTL
Nominal Power	215 kW
Euro Efficiency	98.6 %
Output	400V 3 Phase
Warranty	5 years factory warranty
Racking System	
Supplier	Schletter or Similar (Tier One)
Type	Single Axis Tracker
Table Inclination (Both sides)	60°
Slope Gradient	10°
Wind Speed	Maximum operating wind speed of 60km/h; up to 290km/h in the security(stow) position.
Material	H4 Material Specification in order to withstand class 4 corrosion conditions.

Battery Energy Storage System (BESS)

The leading technology for stationary large-scale energy storage application are containerized Li-Ion Storage Systems (Figure 4-7). This solution is offered by several manufacturers such as Huawei, ABB, mtu or Tesla. The representative system comprises Li-Ion battery racks, each containing typically 480 MCN cells, combined in Battery Modules and controlled by a Battery Management System, including switchgear. The batteries cells are usually supplied by leading manufacturers like SAMSUNG, LG Chem or Panasonic and will perform at 80% of initial capacity after 4000 cycles with an assumed D.O.D (Depth of discharge) of 80%. The main advantage of Li-Ion storage compared to other technologies is its high roundtrip efficiency of around 88%, consequently PV loss due to battery charging is kept to a minimum. Operation and maintenance costs do not occur for this type of battery; however, lifetime is limited to the above discussed 4000 cycles which corresponds to about ten to fifteen years of operation.

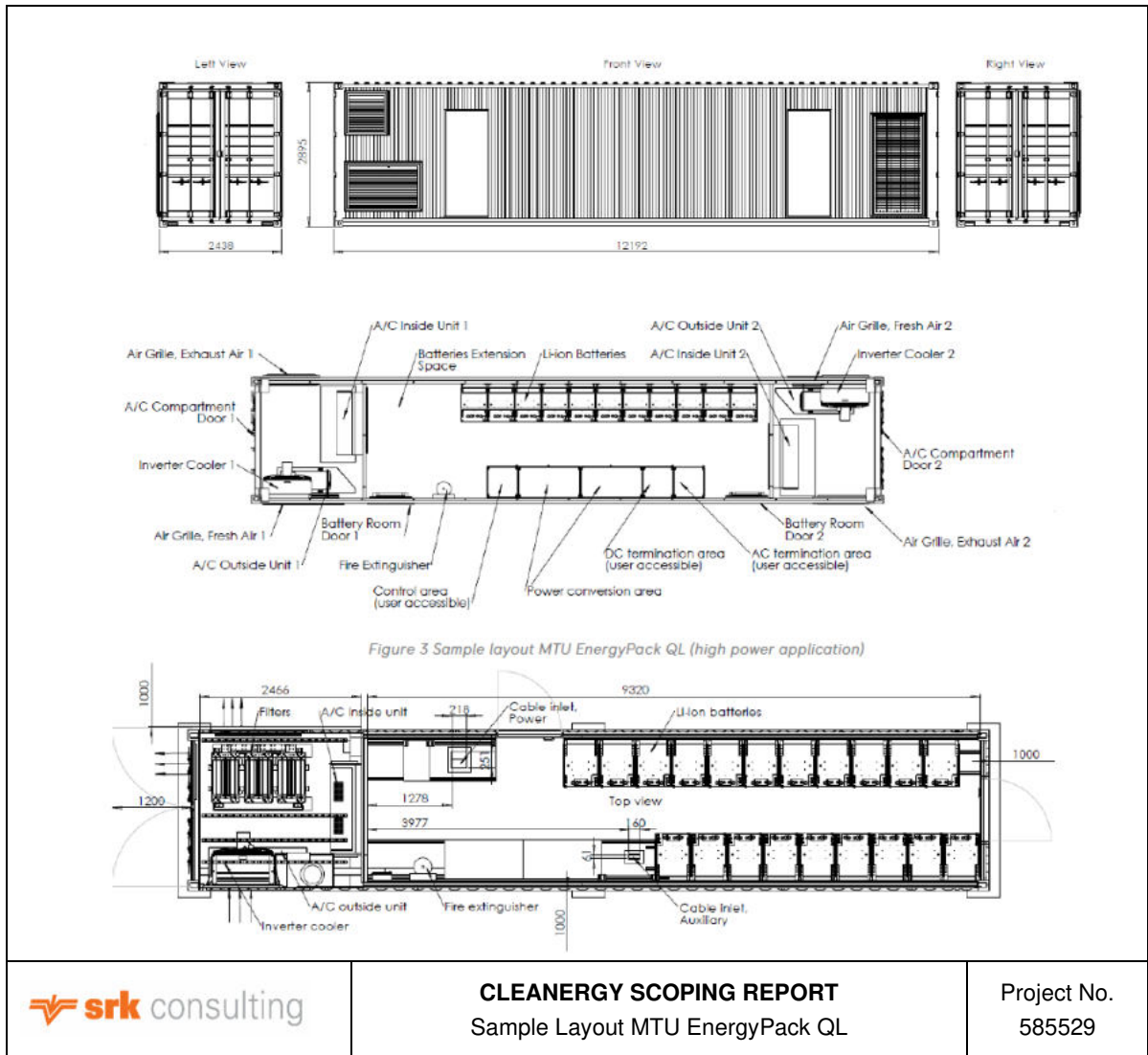


Figure 4-7: Sample Layout MTU EnergyPack QL

O&L Nexentury has successfully built large-scale Li-Ion battery systems in previous projects. Depending on further specifications, O&L Nexentury proposes a fixed ground-mounted bifacial layout with a state-of-the-art Li-Ion BESS.

4.5.2 Green Hydrogen Demonstration Plant

Figure 4-8 illustrates the key components of the 5 MW GHDP.

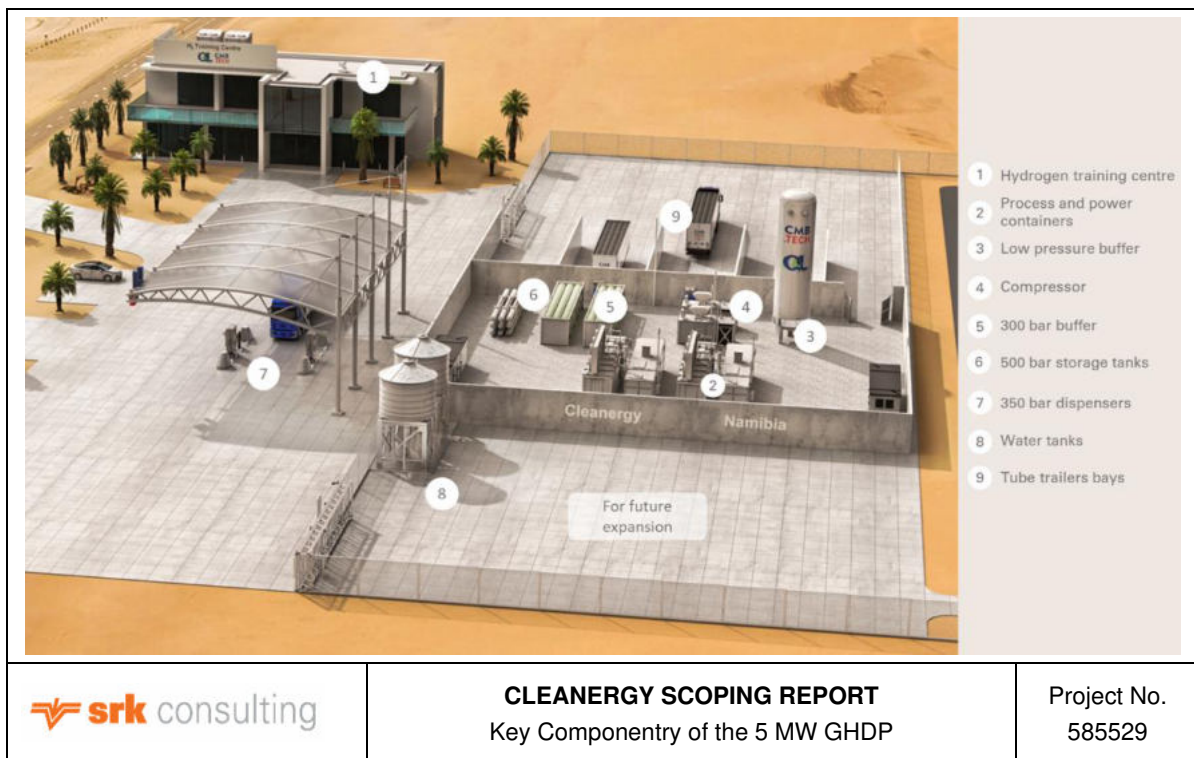


Figure 4-8: Key Componentry of the 5 MW GHDP

Hydrogen System

For the demonstration project, Cleanergy Solutions Namibia will be using the state-of-the-art electrolyser for the production of green hydrogen using solar panels as energy source. To deliver hydrogen to end-customers, hydrogen molecules need to be produced, then purified, compressed, and stored at the right pressure. All the equipment will be fully containerised to safely produce purified hydrogen from on-site water and power utility inputs.

Electrolyser

The site will be equipped with a 5 MW PEM electrolyser. The electrolyser is the key component for producing green hydrogen. It uses electricity to break water molecules into hydrogen and oxygen in a process called electrolysis (Figure 4-9).

This hydrogen production equipment called, a PEM electrolyser, consists of two electrodes, an anode and a cathode, and a semi-permeable membrane. Water molecules enter at the anode side and are split, when an electrical current is applied on the cell stack, into oxygen (O₂), hydrogen ion (H⁺) (proton) and two electrons. The protons flow through the membrane and form hydrogen at the cathode side through the combination of two protons and two electrons (Figure 4-9).

The produced oxygen gas is released to the atmosphere or can be captured and processed for industrial processes or even medical gases in some cases.

The hydrogen gas is then purified to meet the required quality standards.

The electricity will be provided by the solar park which is located next to the hydrogen production site. As the electrolyser requires Direct Current (DC) power, a power container will be installed next to the electrolyser. This power container is equipped with transformers and rectifiers to deliver the desired voltage to the electrolyser cell stack.

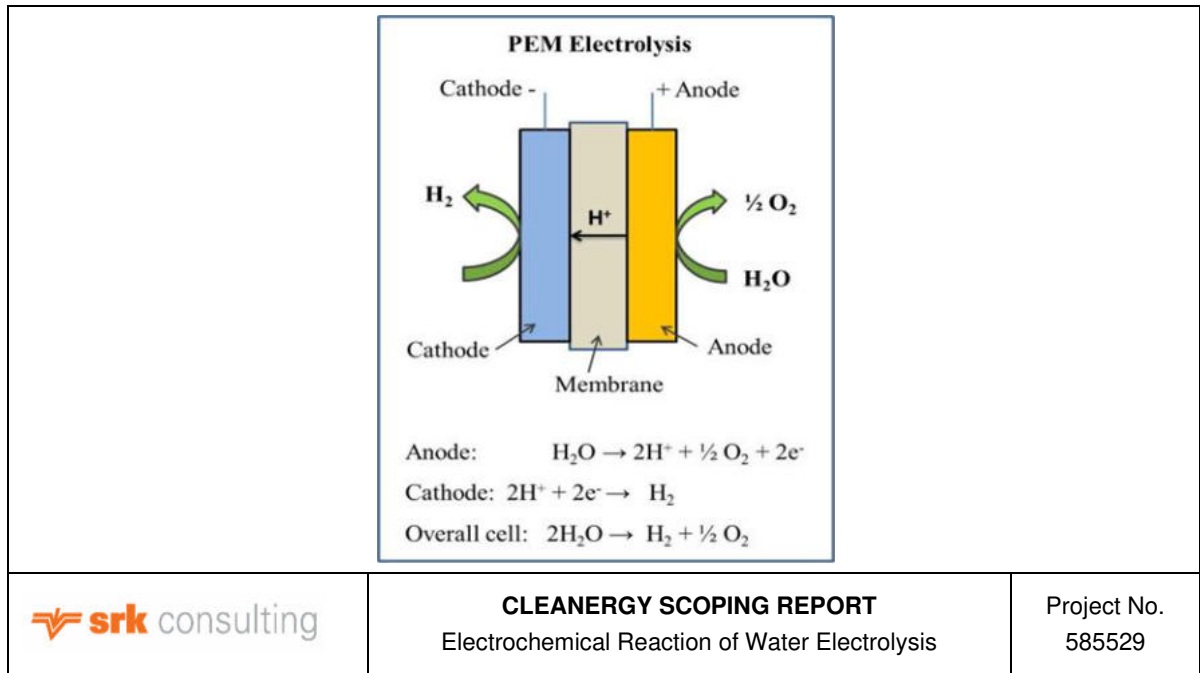


Figure 4-9: Electrochemical Reaction of Water Electrolysis (Kumar & Himabindu, 2019)

The electrolyser system is divided into 2 parts:

- Power container: The 40 feet container is equipped with transformers and rectifiers; and
- Production containers: Two (2) 40 feet containers are needed to host the hydrogen production equipment. It consists of one 5 MW PEM electrolyser cell stack, water and hydrogen purification system, cooling system, instrumentation, and control system.

Table 4-4: PEM Electrolyser Specifications

Capacity	5 MW
H₂ production at max. power	90 kg/h
Outlet pressure	40 bar
System efficiency at full output	56.7 kWh/kg
Total anticipated water consumption	1.2 m ³ /h
Footprint	Global footprint of 200 m ² divided into: <ul style="list-style-type: none"> • One (1) 40 feet container: power container • Two (2) 40 feet containers stacked on each other for the hydrogen production

Compressor

Once the hydrogen molecules are produced and purified, these are compressed to increase their energy density in order to facilitate the storage thereof. The site will be equipped with three compressors to increase the pressure of the hydrogen gas up to 550 bar. The compressor technology is not defined yet. Two options are currently being evaluated by Cleanergy i.e., diaphragm compressors and piston type compressors. Due to the required high quality of the hydrogen and the risk of pollution, the compressors will be oil free (free from lubricants) in the areas where the hydrogen molecules are compressed.

The diaphragm compressor increases the pressure of the gas by means of a flexible membrane and hydraulic oil (Figure 4-10). During the operation of the compressor, each revolution of the piston delivers a certain amount of hydraulic oil to the membrane. This oil moves the membrane upwards

and compresses the hydrogen gas situated on the other side of it. The back and forth moving membrane is driven by a rod and crankshaft mechanism. Only the membrane and the compressor box come into contact with the hydrogen. This ensures that the hydrogen molecules are not contaminated by other fluids.

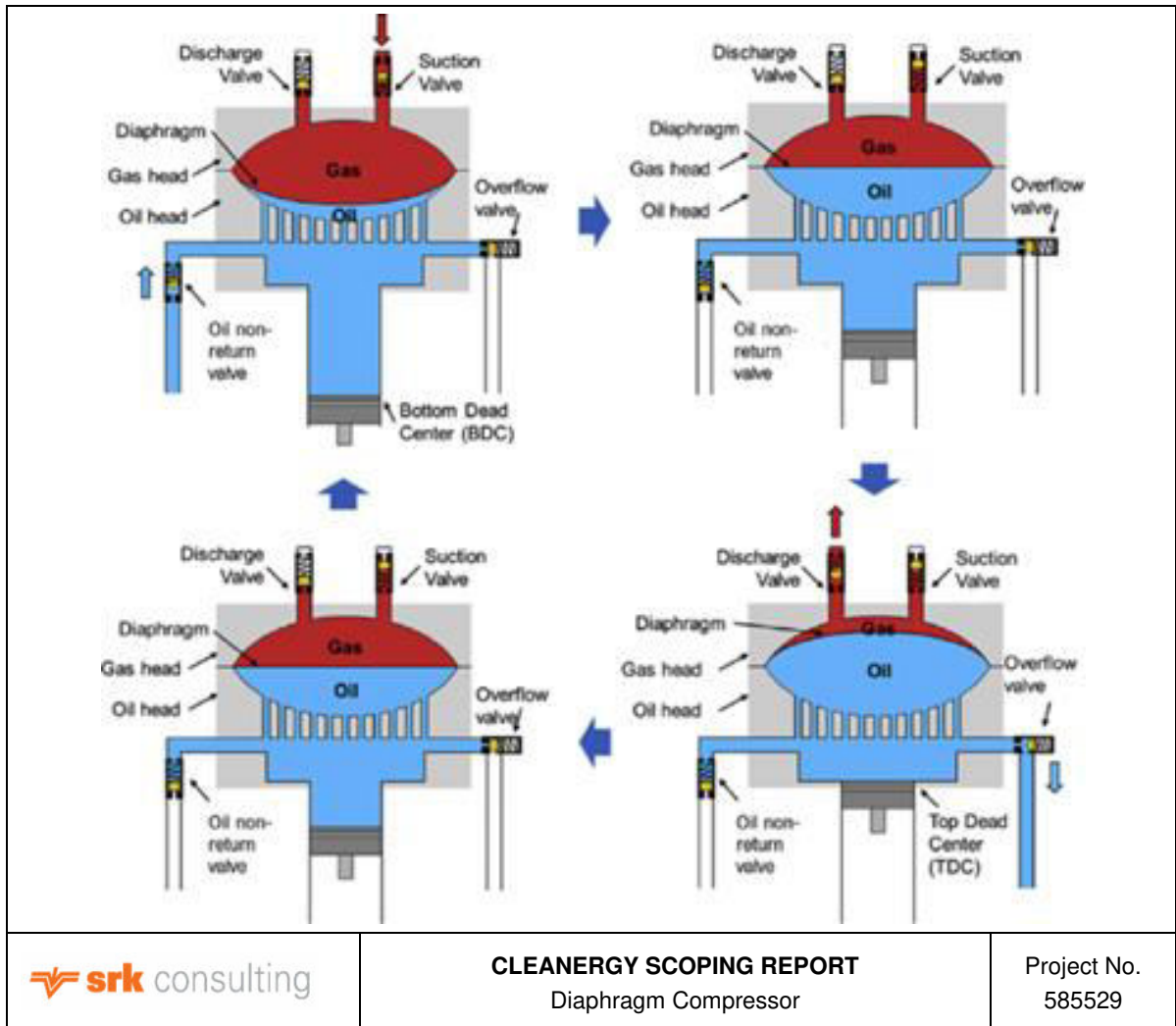


Figure 4-10: Diaphragm Compressor (Li, et al., 2019)

A piston compressor is mainly composed of one hydraulic cylinder and two gas cylinders (Figure 4-11). A steel rod connects the oil piston with two gas pistons. The pressure of the oil on the oil piston moves the connecting rod and gas is compressed in the gas cylinders by the gas pistons. The only moving part is the connecting rod. With this simple construction all forces are applied towards the same direction and are balanced by the hydraulic oil. Two sets of seals (one on the gas and one on the oil side) ensure that the hydrogen molecules are not contaminated by other fluids.

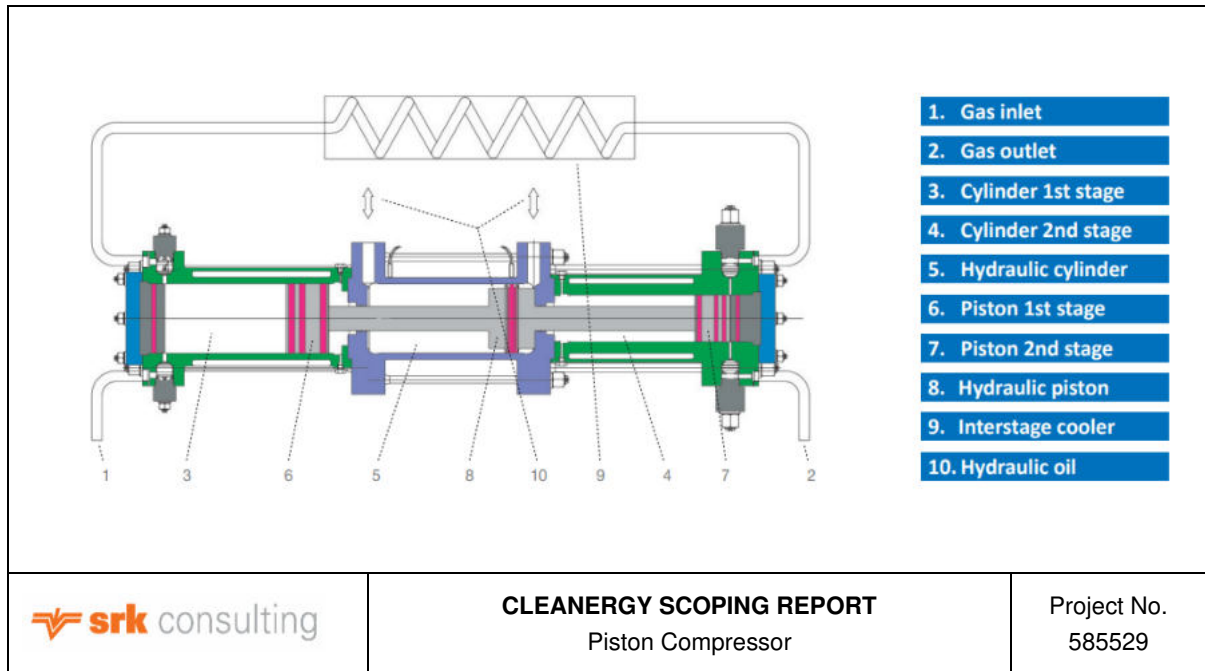


Figure 4-11: Piston Compressor (Hofer, n.d.)

To ensure redundancy, three compressors will be installed. Each compressor has the capacity of 50% of the total required capacity, thus three times 50%. During normal operations, two systems will be in use whilst one system serves as a spare. Each compressor will have a maximal hydrogen flow of 45 kg/h. As mentioned previously, the type of compressor is not yet defined.

Storage

A small 40 bar buffer is placed between the electrolyser and the compressors to overcome the time to start the electrolyser and the possibility to run the compressor in partial mode. This buffer consists of one big, Type I, steel cylinder placed vertically or horizontally.

Hydrogen will be stored at 300 bar and 500 bar. To ensure safe and continuous delivery of hydrogen, the site will have a capacity of about 2 days of production distributed between 300 bar and 500 bar. For the 300 bar and 500 bar storage, the intention is to use standard MEGC stationary container composed of vertical aligned Type IV cylinders. Type IV cylinders are made of a polymer liner wrapped in carbon fibres. This technology ensures a low weight and high storage pressure.

The capacity of the 40-bar buffer is not defined yet and will be defined based on the operations requirements and the operations limits of the equipment. The intention is to install a 40 m³ buffer.

The capacity of the 300 bar and 500 bar buffers is also not defined yet. The target is to have at least two days of production to ensure 24 hours, seven days a week operation. This corresponds to a capacity of +/- 2000 kg of hydrogen stored at two different pressures. Approximately 1200 kg of hydrogen will be stored at 300 bar while approximately 800 kg will be stored at 500 bar. Each buffer will consist of a 40 feet container.

Hydrogen Refuelling Station

One dual dispenser (1x TK16 & 1x TK16 HF) for heavy duty vehicles will be installed. The discharge pressure for fuelling equals 350 bar (Figure 4-12). This dual dispenser is designed according to the safety features as described in the Dutch PSG35 code.

The demonstration plant will further have a 500-bar mobile refueller which can be used to refuel heavy duty applications in the field, being a test ground for CMB.TECH H applications such as:

- Tugboat for Namport;
- Heavy duty mining dump truck;
- Port equipment;
- Locomotive for TransNamib/Traxtion;
- Trucks for long distance road transport; and
- Gensets.

Table 4-5: Fuelling Base Case

Number of vehicles	10 per day
Maximum per vehicle	30 kg (heavy duty truck)
Average fill per vehicle	20 kg
Throughput per day	200 kg
Maximum fuelling time	Max. 15 minutes
Maximal fuelling in sequence	Two parallel fuelling possible

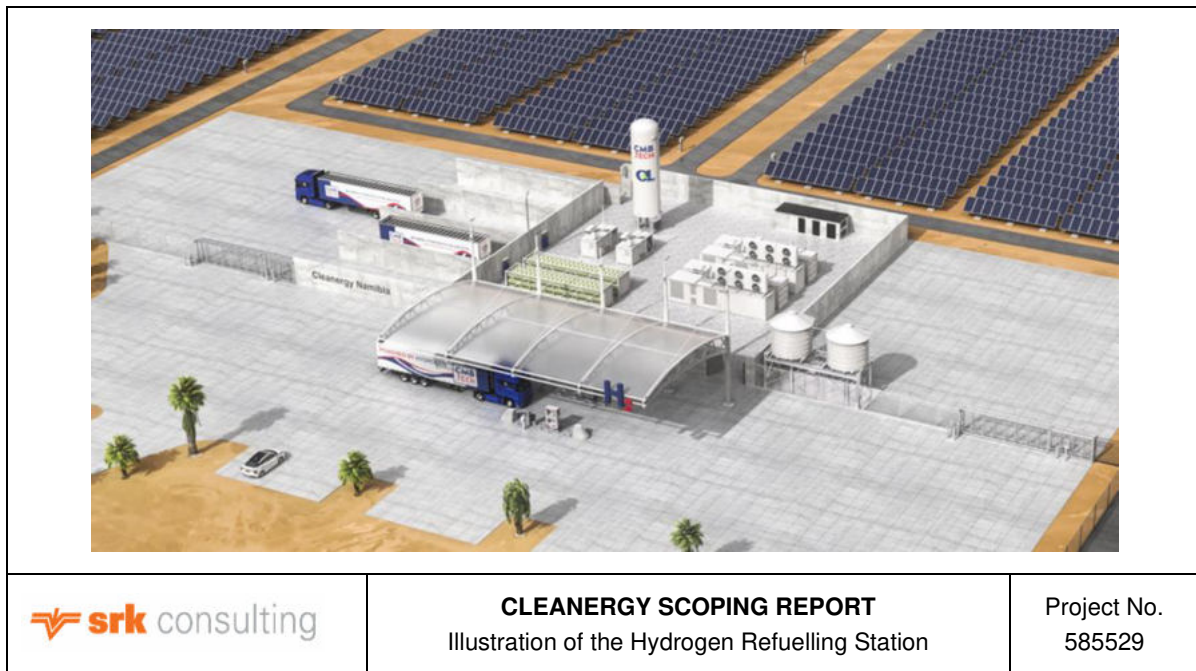


Figure 4-12: Illustration of the Hydrogen Refuelling Station

Effluents/Emissions from the GHDP Electrolyser

Effluent from the GHDP electrolyser should be suited to run into the sewer without requiring additional treatment. These effluents will be generated from the following sources:

- Water purification;
- Condensate from condensate trapes, chiller and the dryer;
- Air compressor (oil free type) and dryer; and
- Other sources not specified.

Emissions to air include:

- Gaseous hydrogen releases routed out to atmosphere at a safe location by means of a central vent stack; and
- Gaseous oxygen released to atmosphere.

4.5.3 Training Centre

To kickstart the project, Cleanergy will need to train a number of people around Walvis Bay from basic hydrogen knowledge to providing hands on experience. The training centre which will include classrooms and workshops facilities will be one of its kind where various groups of people can learn and develop hydrogen skills (Figure 4-13).

Training will typically be provided to hydrogen off-takers, service and engineering companies and people from neighbouring communities. One of the key objectives of the pilot project is thus to develop the local skillset required to support green hydrogen projects.

Education will be necessary to guarantee Cleanergy's license to operate and to showcase the potential of hydrogen to the whole community. Beside these intense and practical training opportunities in Walvis Bay, Cleanergy also want to support the education of the Namibian youth in the rest of Namibia.

Cleanergy believes that the highest impact on education can be reached by joining forces with all relevant stakeholders. Therefore, Cleanergy reached out to different educational institution in Namibia including:

- University of Namibia (UNAM) – A Memorandum of Understanding has been signed between UNAM and Cleanergy Solutions Namibia. UNAM is the premier institution of tertiary education in Namibia consisting of four faculties and twelve campuses country wide. This outreach makes UNAM a truly community-based institution, renowned for its academic excellence, outstanding research, and community development projects.

Cleanergy Solutions Namibia and UNAM are willing to collaborate on following possible R&D projects:

- Comparison of different technologies for electrolysers and solar parks within the Namibian environment. For research purposes different technologies can be evaluated in Cleanergy pilot plant; and
 - Optimisation of full plant scenarios based on analyses of operational and production data.
- Namibia University of Science and Technology (NUST); and
 - Namibian Institute of Mining and Technology (NIMT) Arandis - NIMT provides cost effective and quality vocational and educational training to Namibian students. The goal of the Institute is to equip Namibians with skills and knowledge that will enable them to take up positions as artisans within different sectors such as mining, civil, engineering, mechanics, electronics etc.

NIMT and Cleanergy Solutions Namibia are willing to collaborate on education of artisans (vocational training) to become the future employees of our hydrogen production plant. The collaboration can include course content and provision of training equipment related to hydrogen production and hydrogen applications.

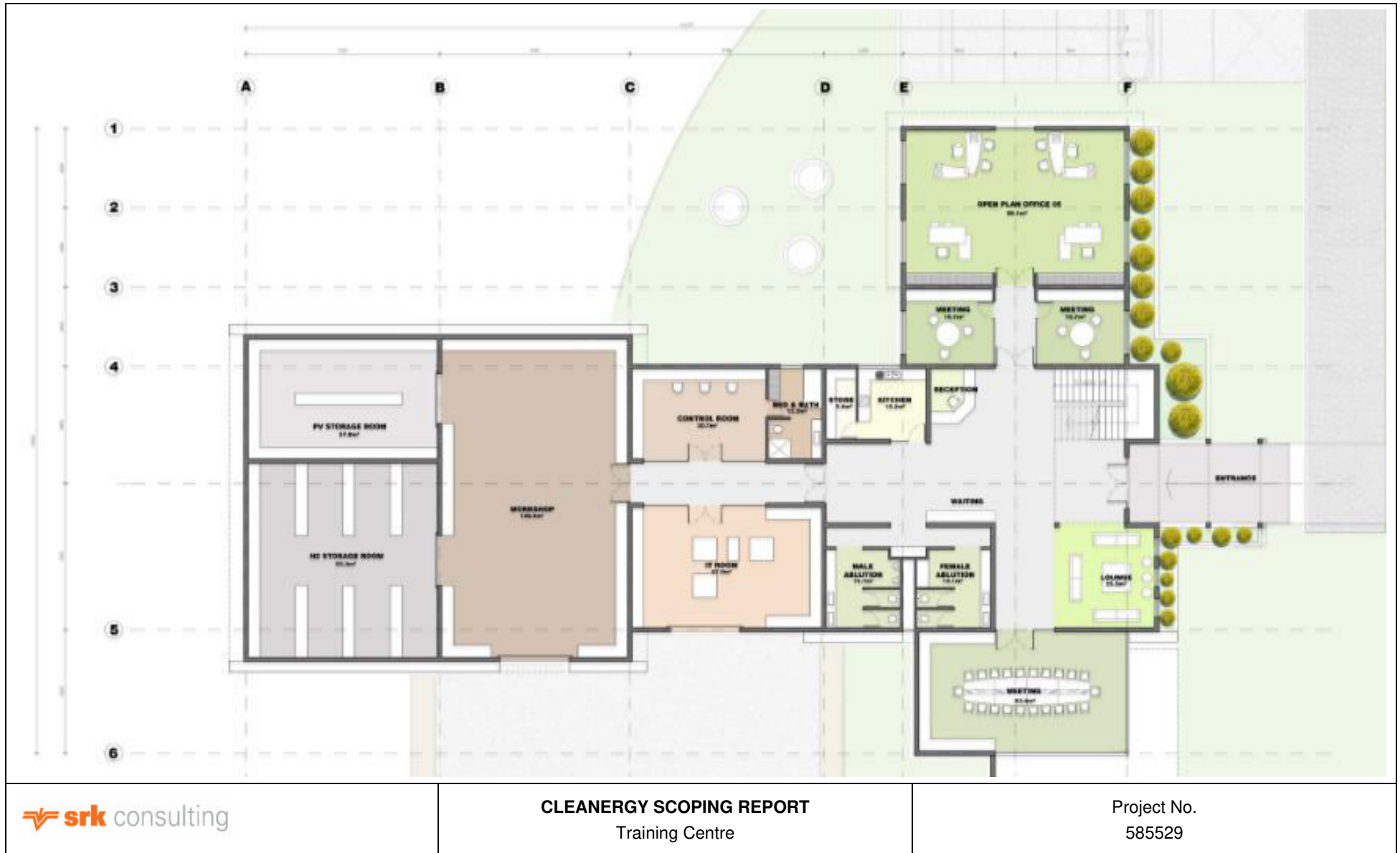


Figure 4-13: Training Centre

4.5.4 Access Road

It is noted that the Dune 7 interchange and service road to the heavy industrial zone needs to be completed in order to gain access site (Figure 4-14). Figure 4-15 illustrate the site entrance road proposed for the Cleanergy GHDP Project.

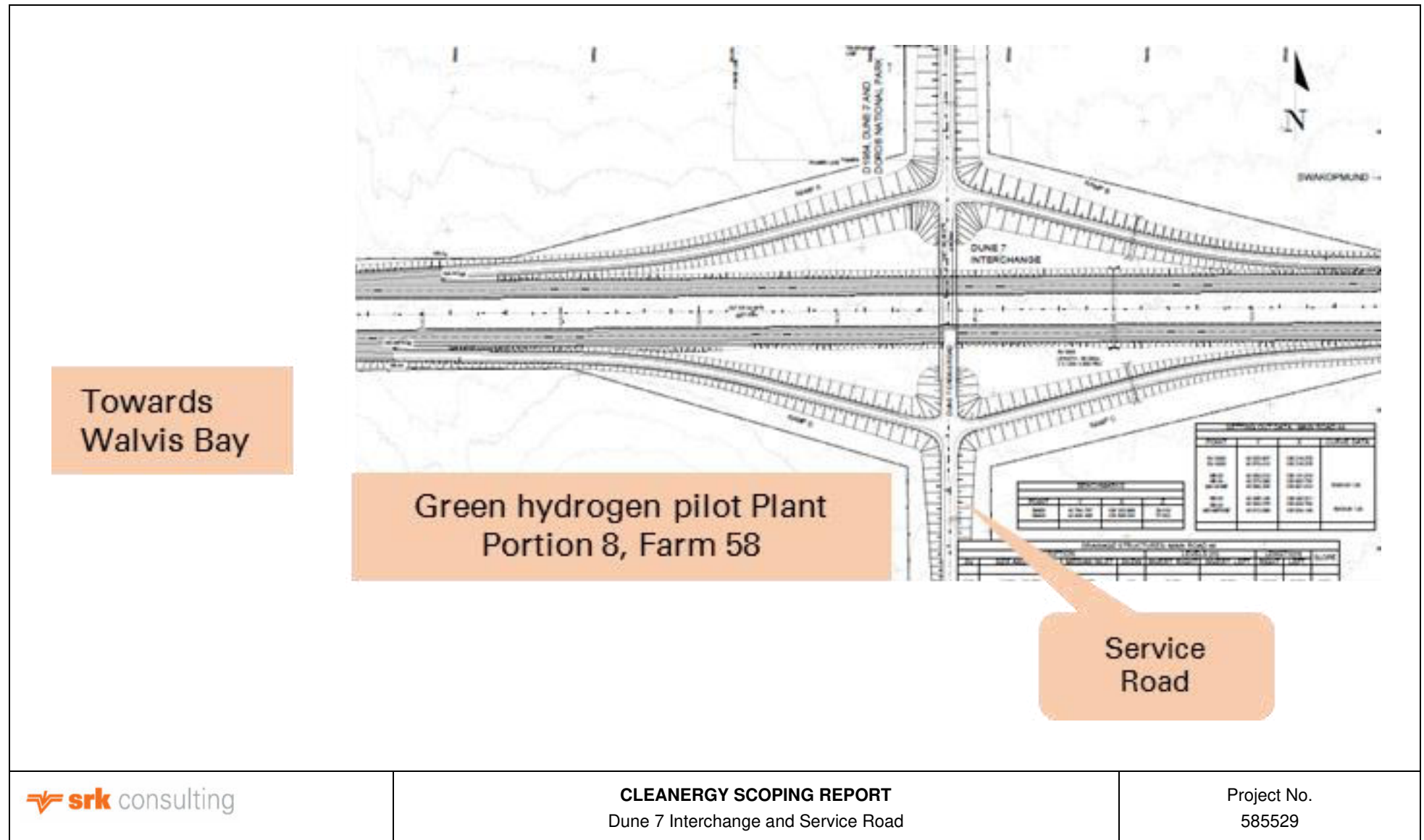


Figure 4-14: Dune 7 Interchange and Service Road

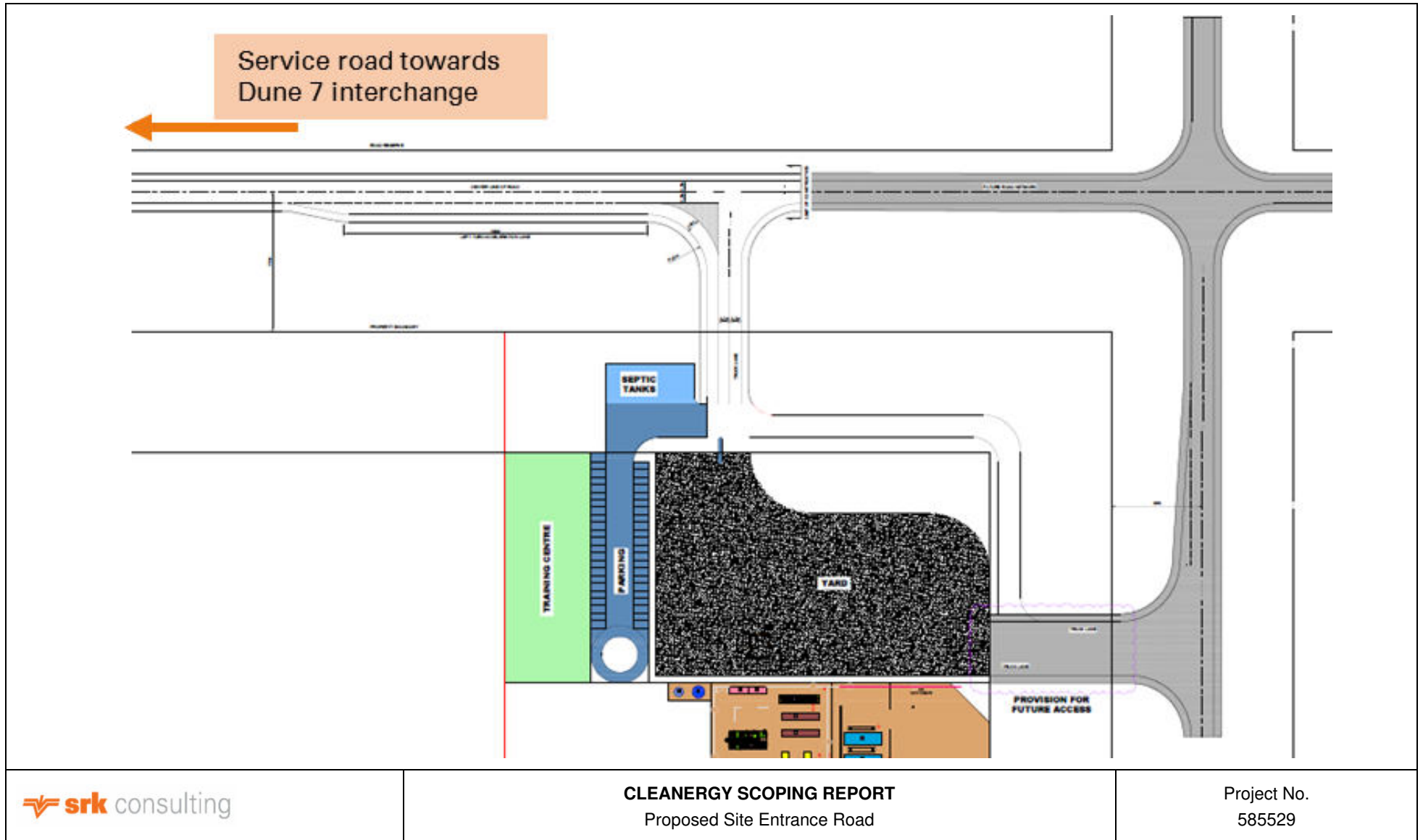


Figure 4-15: Proposed Site Entrance Road

4.5.5 Potable Water Pipeline Connection

At full load, the electrolyser requires 1200 litres (1.2 m³) per hour to produce 90 kg of hydrogen. Of this, 200 litres per hour will be rejected by the electrolyser's water treatment system. From this volume, 1 000 litres are effectively split into hydrogen and oxygen, while the rest is used as cooling water.

Depending on the season, Cleanergy will require between 10 and 14 m³ of potable water per day for hydrogen production. The extra water, can be used for different purposes including:

- Domestic/Sanitation;
- Growing plants on site; and
- Cleaning the solar panels.

The water which will be used in the process, is potable water to be supplied directly to site from municipality with a direct connection to the main water pipelines. The closest municipal water access point is approximately 1.5 km from the site. A new pipeline connection has to be established to have water access. To ensure safe operations and sustainable water usage, the option of a 400 m³ to 500 m³ water buffer tank will be envisaged.

4.5.6 Electrical Transmission

The Cleanergy GHDP Project requires grid connection to support night time operation and/or production. To kick-start the pilot project a minimum of 600 kiloVolt Ampere (kVA) grid power during night hours to support auxiliary system demands & training/office building.

To future proof the plant, it is necessary to have a 5 MVA grid connection, where surplus electricity from the PV could potentially be injected into the grid whilst off takers for the hydrogen are being developed. Once the hydrogen off-take base has been established, the 5 MVA grid connection can be used for producing hydrogen during night hours (by using surplus electricity).

As the connection to the grid will ultimately be the responsibility of ErongoRed, a separate EIA process will be undertaken to obtain an ECC for the connection to the ErongoRed grid.

4.6 Project Activities

Activities associated with the development and operation of the proposed Cleanergy GHDP Project is described in the following sections.

4.6.1 Site Preparation Phase

Site preparation activities will commence following the granting of the ECC. This Phase would include limited clearance of vegetation present on site, the installation of perimeter fencing, site levelling and preliminary earthworks. Thereafter the project site will be marked out, construction site offices set up and a temporary access road to site constructed.

4.6.2 Construction Phase

Once site preparation activities have been completed, the Construction Phase of the proposed Cleanergy GHDP Project will commence. Construction phase activities will include:

- Bulk earthworks;
- Layer works and surfacing of roads and hardstand areas;
- Installation of sub surface civil services such as water, sewer, fire and electrical networks;
- Construction of general storage facilities for water and sewage (complete);

- Excavation of cable and pipeline trenches;
- Ramming or drilling of the mounting structure frames;
- Installation of the PV modules onto the frames;
- Installation of measuring equipment;
- Laying of cables between the module rows to the inverter stations;
- Optionally laying of gravel or aggregate from nearby quarries placed in the rows between the PV panel array for enhanced reflection onto the panels, assisting in vegetation control and drainage;
- Construction of foundations for the inverter stations and installation of the inverters;
- Construction of the foundations for the hydrogen production electrolyzers, compressors, storage vessels, power container and hydrogen dispensing station;
- Construction of the substation and BESS foundations and installation of the substation components and placement of BESS;
- Construction of operations and maintenance buildings;
- Construction of refuelling station;
- Piping structure installation and piping interconnections between components;
- Cable structure installation and cabling interconnections between components;
- Undertaking of rehabilitation on cleared areas where required;
- Testing and commissioning;
- General fencing; and
- Removal of equipment and disassembly of construction camp.

It is noted that where possible, Cleanergy will source materials, plant and equipment from suppliers within the vicinity of the project area. The bulk of the specialist equipment, i.e., PV modules, inverters, BESS, substation components and BESS, etc, will be imported from China, Europe and/or South Africa and be shipped to Walvis Bay.

The construction phase of the proposed Cleanergy GHDP Project is estimated to take approximately 6-12 months.

4.6.3 Operational Phase

The proposed project will be operated on a 24-hour, 7 days a week basis. The operation phase of the proposed project will comprise the following activities:

- Operating of Training Centre which will include classrooms and workshops facility from where basic hydrogen knowledge to hands on experience can be delivered to various parties;
- Installation and testing of different green hydrogen technologies;
- Regular cleaning of the PV modules by trained personnel;
- Vegetation management under and around the PV modules to allow maintenance and operation at full capacity;
- Maintenance of all components including PV modules, mounting structures, trackers, inverters, substation transformers, BESS, and equipment;

- Office management and maintenance of operations and maintenance of buildings;
- Supervision of the solar PV facility operations;
- Supervision of the hydrogen production, storage and dispensing facilities;
- Site security monitoring;
- Executing storm water management plan;
- Managing sewage disposal; and
- General road/site maintenance.

4.6.4 Decommissioning Phase

Whilst the solar PV plant itself will have an anticipated life cycle of 25 years, the GHDP will only be in operation for as long as it is feasible. If decommissioned, the necessary approvals will be obtained before all components are to be removed and the site rehabilitated. Materials will be recycled where possible and where it is not possible to recycle the materials, these will be disposed of in accordance with local regulations and international best practice.

5 Description of the Baseline Environment

The following section presents an overview of the biophysical and socio-economic environment in which the proposed project is located, so as to:

- Understand the general sensitivity of and pressures on the affected environment;
- Inform the identification of potential issues and impacts associated with the proposed project, which was assessed during the impact assessment phase;
- Identify gaps in available information to inform specialist study requirements; and
- Start conceptualising practical mitigation measures.

Baseline information for this Scoping Report was sourced through desktop analysis and information contained in studies undertaken by the various Namibian governmental departments and environmental non-governmental organisations. Baseline information was obtained from the following sources:

- Atlas of Namibia (Mendelsohn et al., 2002) and Namibia's Coast (Robertson et al., 2012);
- EIA study for the Establishment of Walvis Bay Golf Course and Residential Areas to be known as the Presidents Links Estate (KPM Environmental Consulting, 2021);
- EIA study for the HDF Energy Renewable Swakopmund Project (SLR, 2022);
- Integrated Urban Spatial Development Framework for Walvis Bay (2011);
- Information found through internet searches on the project area;
- Topocadastral and geological maps covering the application area at scales ranging from 1:50 000 to 1:250 000; and
- Inputs from environmental and social specialists.

It is noted that the proposed Cleanergy GHDP Project area does not have any major unique habitats, is not in a pristine condition and is heavily impacted by various anthropomorphic activities.

5.1 Socio – Economic Environment

As mentioned previously, the proposed GHDP will be located outside Walvis Bay in the new industrial zone, near the Walvis Bay International Airport and Dune 7 (inland to the Dune), to the East of the new Walvis Bay-Swakopmund highway (D1984). The Narraville Community is the closest community to the proposed GHDP Project, with a line of site distance of almost 6 km. No unique habitats occur on site and the project area is heavily impacted by various anthropomorphic activities.

Walvis Bay is in the Erongo Region of Namibia and is the largest town in the region, with a population of 62 000 in 2011 (NSA, 2014). The town is Namibia's main industrial harbour town with an efficient international port and is becoming a growing logistics hub for other Southern African Development Community (SADC) countries. It is also the base to a large fishing industry.

The Erongo Region has a relatively young population, with a median age of 26 years, and over 68% of the urban population are people of working age (between 15 and 59 years) (NSA, 2014). The most common home languages spoken in the region are Oshiwambo, spoken by 38.8% of the population. Afrikaans is spoken as a home language by 20.4% of the population, Nama/Damara by 18.8%, English by 5.3% and German by 2.8% (NSA, 2014).

One of the key concerns raised during the public participation and stakeholder engagement, was the possible impact of this project on the socio-economic environment. It was noted that past projects promised a lot but delivered little and care must therefore be taken to ensure that the project provides benefits to the community. In line with this a consultant was identified, to assist the proponent with ensuring that the impacts of, especially the construction phase, can be adequately managed. Due to the importance placed on this item by the proponent, it was decided to allow the consultant to define the baseline of the socio-economic component outside the formal EIA process and then to proactively work with the proponent and contractors to develop sensible mitigation controls prior to the start of construction. Therefore, the socio-economic study will not be part of the formal EIA process but will be executed as part of the EMP in order to make it more proactive.

5.2 Biodiversity

This Section has been extracted from the Biodiversity Baseline Study compiled by Peter Cunningham (Cunningham, 2022).

5.2.1 Habitat

The general area is commonly – albeit broadly – referred to as the Southern Namib (Giess 1971) or Southern Desert (Mendelsohn *et al.*, 2002) and the vegetation structure is classified as grassland and dwarf shrubland (Mendelsohn *et al.*, 2002) (Figure 5-1).

5.2.2 Vegetation

According to Maggs (1998) there are approximately 4,344 higher plant species with the most species being within the grasses (422), composites (*Asteraceae*) (385), legumes (*Fabaceae*) (377) and figies (*Mesembryanthemaceae*) (177), recorded from Namibia. Total species richness depends on further collecting and taxonomic revisions. High species richness is found in the Okavango, Otavi/Karsveld, Kaokoveld, southern Namib and Central Highland (Windhoek Mountains) areas. Endemic species – approximately 687 species in total – are mainly associated with the Kaokoveld (north-western) and the succulent Karoo (southwestern) Namibia. The major threats to the floral diversity in Namibia are:

- Conversion of the land to agriculture (with associated problems); and
- Poorly considered development (Maggs, 1998, Mendelsohn *et al.*, 2002).

According to Giess (1971) the Southern Namib stretches from the Swakop River southwards until Lüderitz. *Stipagrostis sabulicola* (tough dune grass) occurs with *Trianthemahereroensis* on the dunes while the inter-dune flats (streets) are covered with *Stipagrostis gonatostachys* after rains. The eastern inland sections – pro-Namib – are dominated by *Stipagrostis obtusa* and *S. ciliata* after rains while the plains closer towards the coast are dominated by *Mesembryanthemum cryptanthum* (Giess, 1971).

An interesting feature of the coastal areas is the extensive formation of gypsum crusts in the soil as a result of sulphur releases during upwelling events in the ocean in the past. These substrates support the most diverse lichen fields in the world (Burke, 2003). Namibia has some of the rarest and most interesting species of lichens in the world although many have still not been officially described (Craven & Marais, 1986).

Burke (2003) estimates that over 400 species – 10% of the flora of Namibia – occur in the central Namib and although it has not been identified as a centre of endemism, it is dominated by endemics such as *Arthraerualeubnitziae*. The greatest variants affecting the diversity of plants are habitat and climate with the highest plant diversity generally associated with high rainfall areas.

The average plant production is extremely low (bare ground) with much variation (e.g., 0-5%) in green vegetation biomass (Mendelsohn *et al.*, 2002). The overall plant diversity (all species - "higher" plants)

in the general area is also low with <50 species (Mendelsohn *et al.*, 2002). Plant endemism is viewed as low with 2-15 species expected from the general area (Mendelsohn *et al.*, 2002). Simmons (1998b) puts the plant endemism at between 1 and 20 species depending on the locality.

Furthermore, Mendelsohn *et al.* (2002) views the grazing and browse as virtually non-existent in the general area (although browse is good along the ephemeral Kuiseb River) with the risk of farming viewed as high and the tourism potential of this area viewed as average.

5.2.3 General

Climatically the coastal area is referred to as Cool Desert with a high occurrence of fog (Van der Merwe, 1983). The Namib Desert Biome makes up a large proportion (32%) of the land area of Namibia with parks in this biome making up 69% of the protected area network or 29.7% of the biome (Barnard 1998). This has increased since the establishment of the Dorob National Park. Four of 14 desert vegetation types are adequately protected with up to 94% representation in the protected area network in Namibia (Barnard, 1998). The area is bordered by the Kuiseb River to the south (Walvis Bay area) and the Swakop River to the north (Swakopmund area) with catchment areas of 15,500 km² and 30,100 km², respectively with common riparian species including Ana tree, Tamarix, Camelthorn, Salvadora, Fig, Euclea, !Nara and Mesquite (Jacobson *et al.*, 1995).

Two important coastal wetlands – i.e., Walvis Bay Wetlands and Sandwich Harbour – both Ramsar sites, occur in the area. According to Curtis and Barnard (1998) the entire coast and the Walvis Bay lagoon as a coastal wetland, are viewed as sites with special ecological importance in Namibia. The known distinctive values along the coastline are its biotic richness (arachnids, birds and lichens) with the Walvis Bay lagoon's importance being its biotic richness and migrant shorebirds as well as being the most important Ramsar site in Namibia. The Ramsar site covers 12,600 ha with regular counts of birds varying between 37,000 and well over 100,000 individuals, albeit mainly migratory species (Kolberg, n.d.). The Walvis Bay wetland is considered the most important coastal wetland in southern Africa and one of the top 3 in Africa (Shaw *et al.* 2004). The Sandwich Harbour Ramsar site covers 16,500ha and falls within the Namib-Naukluft Park and enjoys full protection (Kolberg, n.d.). This area is a centre of concentration of migratory shorebirds, waders and flamingos regularly supporting over 142,000 and 50,000 birds during summer and winter, respectively (Kolberg, n.d.).

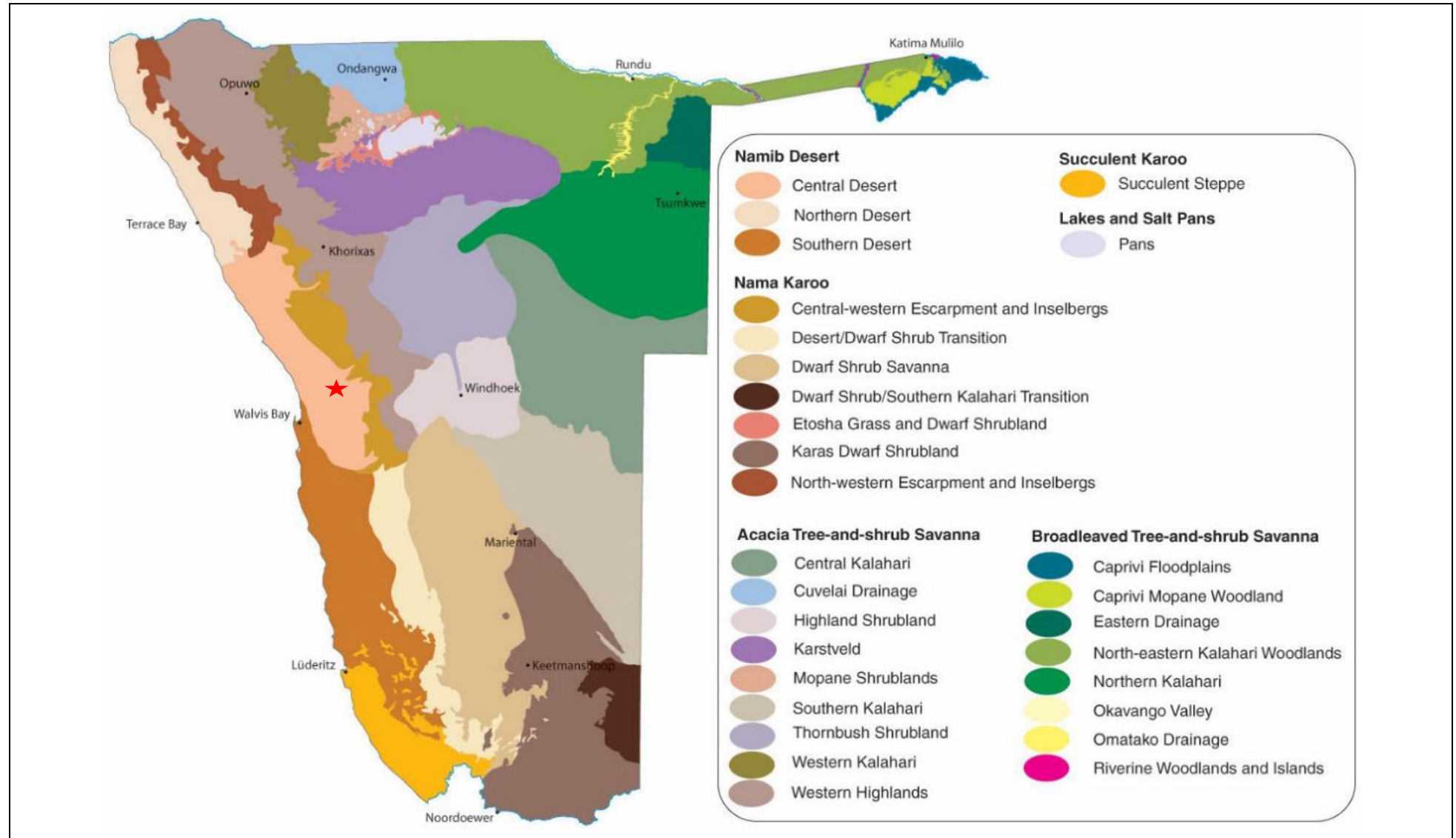
The gravel plains east of the dune belt are viewed as a biodiversity "Yellow Flag Area" due to lichens and biodiversity associated with the Tumas drainage area – i.e., Tumas 'mouth' (reedbed and ephemeral spring on eastern edge of dunes) – hummocks and ephemeral wetland (SAIEA, 2010). Other important areas in the general vicinity include the biodiversity "Red Flag Areas" such as the coast immediately north of Walvis Bay (important bird area; high density of waders along beach and Damara tern breeding area); Kuiseb River (Linear oasis, riparian woodland, aquifer recharge, rich wildlife.) and Swakop River (Linear oasis, riparian woodland, aquifer recharge, rich wildlife, bird light paths) (SAIEA, 2010).

The proposed development area falls adjacent the recently proclaimed Dorob National Park. No communal and freehold conservancies are located in the general area with the closest communal conservancy being the #Gaingu Conservancy in the Spitzkoppe area approximately 100 km to the northeast (Mendelsohn *et al.*, 2002, MEFT/NACSO, 2021).

The central coastal region, and the Swakopmund/Walvis Bay area in particular, is regarded as "relatively low" in overall (all terrestrial species) diversity while the overall terrestrial endemism in the area on the other hand is moderate to high (Mendelsohn *et al.*, 2002).

It is estimated that at least 54 reptile, 7 amphibian, 43 mammal, 185 bird species (breeding residents), 39 species of larger trees and shrubs and up to 48 grasses are known to or expected to occur in the

general/immediate Walvis Bay area of which a high proportion are endemics (e.g., reptiles with 53.7%).



	<p>CLEANERGY SCOPING REPORT</p> <p>Biomes and Vegetation Types in Namibia with the GHDP Area Shown as Red Star</p>	<p>Project No. 585529</p>
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Figure 5-1: Biomes and Vegetation Types in Namibia with the GHDP Area Shown as Red Star (Mendelsohn et al. 2002)

5.2.4 Description of Affected Environment

Vertebrate Fauna

Reptile Diversity

Reptile diversity known and/or expected to occur in the general project area (GHDP) – literature study only – is presented in Figure 5-1.

Approximately 261 species of reptiles are known or expected to occur in Namibia thus supporting approximately 30% of the continent's species diversity (Griffin, 1998a). At least 22% or 55 species of Namibian lizards are classified as endemic. The occurrence of reptiles of "conservation concern" includes about 67% of Namibian reptiles (Griffin, 1998a). Emergency grazing and large-scale mineral extraction in critical habitats are some of the biggest problems facing reptiles in Namibia (Griffin, 1998a). The overall reptile diversity and endemism in the general area is estimated at between 41-50 species and 21-24 species, respectively (Mendelsohn *et al.*, 2002). Griffin (1998a) presents figures of between 21-30 and 7-8 for endemic lizards and snakes, respectively, from the general area.

At least 54 species of reptiles are expected to occur in the general area with 29 species being endemic – i.e., 53.7% endemic. Two species expected to occur in the area (*Stigmochelys pardalis* and *Varanus albigularis*) are classified as vulnerable and protected game although both, especially *S. pardalis*, probably only occasionally frequents the Kuiseb River area as a vagrant and not expected to occur permanently in the area due to the overall arid conditions. *Pelomedusasubrufa* is only expected to occur in drainage lines in the area (e.g., Khan, Kuiseb, Swakop and Tumas Rivers and their tributaries) with suitable habitat – i.e., long-lasting water holes. *Lycophidioncapense* and *Lycophidionnamibianum* only marginally occur in the Namib-Naukluft Park (Griffin, 1998a) and potentially could occur in the general area. Two important species not included in Table 5-1 due to both being sand/dune dwelling species, although potentially could occur in the area dependent on suitable habitat (both species do occur in the dune belt to the west of the GHDP, *pers. obs.*), are *Bitis peringueyi* (Péringuey's Adder) and *Pachydactylusrangei* (Web-footed gecko).

Afroeduraafricanaafricana is classified as insufficiently known and rare (Griffin, 2003) and probably the reptile of most concern in the general area. Another important species from the general area is *Pedioplanishusabensis* which although secure (Griffin, 2003) is associated with the Husab Mountains and surrounding area only (Cunningham *et al.*, 2012). Nine species have an international conservation status (i.e., IUCN; SARDB and CITES) with *Varanus albigularis* the species of most concern and classified as vulnerable, peripheral and protected game under Namibian legislation and listed as safe to vulnerable by the SARDB (2004). Except for a few species all are classified as least concern although some reptiles have not yet been assessed for the IUCN Red List (IUCN, 2022).

The 54 species expected to occur in the general area consist of at least 18 snakes (2 thread snakes, 1 quill snouted and 15 typical snakes) of which 8 species (44.4%) are endemic, 1 tortoise, 1 terrapin, 14 lizards of which 6 species classified as endemic (42.9% endemic), 1 plated lizard, 1 monitor, 1 agama, 1 chameleon and 15 geckos of which 13 species classified as endemic (i.e., 86.7% endemic).

Gecko's (15 species with 13 species being endemic) and snakes (18 species with 8 species being endemic) are the most important groups of reptiles expected from the general area followed by lizards (14 species with 6 species being endemic). Namibia with approximately 129 species of lizards (Lacertilia) has one of the continents richest lizard fauna (Griffin, 1998a). Geckos expected and/or known to occur in the general area have the highest occurrence of endemics (86.7%) of all the reptiles in this area. Griffin (1998a) confirms the importance of the gecko fauna in Namibia.

The endemic *Afroeduraafricanaafricana* (African flat gecko) and *Pedioplanishusabensis* (Husab sand lizard) are viewed as the most important reptiles potentially occurring in the general area.

Pedioplanishusabensis is very habitat specific and mainly occurs on “white/grey” geology in the Khan River area south of Arandis (Cunningham *et al.* 2012). *Leptotyphlops occidentalis* (western thread snake) and *Lycophidionnamibianum* (Namibian wolf snake) are the snakes viewed as the most important in the area.

The most important species is the endemic *Pedioplanishusabensis* (Husab Sand Lizard) which is a restricted range species (100% of the taxon’s range within Namibia) occurring in the general area of the confluence of the Swakop and Khan Rivers. It is furthermore viewed as “threatened” by the ‘uranium rush’ (SAIEA, 2010) with its total known range currently estimated at <5,000km² (Wassenaar *et al.* 2010) which would put it in the “endangered” category according to the IUCN Red List Categories and Criteria (IUCN, 2022). Cunningham *et al.* (2012) showed that *P. husabensis* an extreme habitat specialist, selecting not only marble substrates, but specifically marble surrounded by other bare rock types. However, none of these habitats are known and/or expected in the proposed GHDP area.

Table 5-1: Reptile Diversity Known and/or Expected to Occur in the General GHDP Project Area – Literature Study

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status		
			SARDB	IUCN	CITES
TURTLES AND TERRAPINS					
<i>Stigmochelys pardalis</i>	Leopard Tortoise	Vulnerable; Peripheral; Protected Game		LC	C2
<i>Pelomedusa galeata (subrufa)</i>	Marsh/Helmeted Terrapin	Secure		LC	C3
SNAKES					
Thread Snakes					
<i>Namibiana (Leptotyphlops) occidentalis</i>	Western Thread Snake	Endemic; Secure	P	LC	
<i>Namibiana (Leptotyphlops) labialis</i>	Damara Thread Snake	Endemic; Secure		LC	
Quill Snouted Snakes					
<i>Xenocalamus bicour bicour</i>	Bicoloured Quill-snouted Snake	Secure			
Typical Snakes					
<i>Boaedon (Lamprophis) fuliginosus</i>	Brown House Snake	Secure		LC	
<i>Lycophidion capense</i>	Cape Wolf Snake	Secure		LC	
<i>Lycophidion namibianum</i>	Namibian Wolf Snake	Endemic; Secure		LC	
<i>Pseudaspis cana</i>	Mole Snake	Secure		LC	
<i>Pythonodipsas carinata</i>	Western Keeled Snake	Endemic; Secure		LC	
<i>Dipsina multimaculata</i>	Dwarf Beaked Snake	Endemic; Secure		LC	
<i>Psammophis trigrammus</i>	Western Sand Snake	Endemic; Secure		LC	
<i>Psammophis notostictus</i>	Karoo Sand Snake	Secure		LC	
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake	Secure		LC	
<i>Dasypeltis scabra</i>	Common/Rhombic Egg Eater	Secure		LC	
<i>Aspidelaps lubricus infuscatus</i>	Coral Snake	Secure		LC	
<i>Aspidelaps scutatus</i>	Shield-nose Snake	Endemic; Secure		LC	
<i>Naya nigricincta</i>	Black-necked Spitting Cobra	Endemic; Secure	R		
<i>Bitis arietans</i>	Puff Adder	Secure		LC	
<i>Bitis caudalis</i>	Horned Adder	Secure		LC	

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status		
			SARDB	IUCN	CITES
LIZARDS					
Skinks					
<i>Typhlacontias brevipes</i>	FitzSimon's Burrowing Skink	Endemic; Secure		LC	
<i>Trachylepis acutilabris</i>	Wedge-snouted Skink	Secure		LC	
<i>Trachylepis occidentalis</i>	Western Three-striped Skink	Secure		LC	
<i>Trachylepis striata wahlbergi</i>	Striped Skink	Secure		LC	
<i>Trachylepis sulcata</i>	Western Rock Skink	Secure		LC	
<i>Trachylepis variegata variegata</i>	Variegated Skink	Secure		LC	
Old World Lizards					
<i>Heliobolus lugubris</i>	Bushveld Lizard	Secure		LC	
<i>Meroles anchietae</i>	Shovel-snouted Lizard	Secure		LC	
<i>Meroles reticulatus</i>	Reticulated Desert Lizard	Endemic; Secure		LC	
<i>Meroles suborbitalis</i>	Spotted Desert Lizard	Endemic; Secure		LC	
<i>Pedioplanis breviceps</i>	Short-headed Sand Lizard	Endemic; Secure		LC	
<i>Pedioplanis namaquensis</i>	Namaqua Sand Lizard	Secure		LC	
<i>Pedioplanis inornata</i>	Plain Sand Lizard	Endemic; Secure		LC	
<i>Pedioplanis husabensis</i>	Husab Sand Lizard	Endemic; Secure		LC	
Plated Lizards					
<i>Cordylosaurus subtessellatus</i>	Dwarf Plated Lizard	Endemic; Secure		LC	
Monitors					
<i>Varanus albigularis</i>	Rock or White-throated Monitor	Vulnerable; Peripheral; Protected Game	S to V	LC	C2
Agama					
<i>Agama planiceps</i>	Namibian Rock Agama	Endemic; Secure		LC	
Chameleons					
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon	Secure		LC	C2
Geckos					

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status		
			SARDB	IUCN	CITES
<i>Afroedura africana africana</i>	African Flat Gecko	Endemic; Insufficiently known; Rare?		LC	
<i>Chondrodactylus angulifer namibensis</i>	Giant Ground Gecko	Endemic; Secure		LC	
<i>Narudasia festiva</i>	Festive Gecko	Endemic; Secure		LC	
<i>Pachydactylus bicolor</i>	Velvety Thick-toed Gecko	Endemic; Secure		LC	
<i>Pachydactylus kochii</i>	Kock's Thick-toed Gecko	Endemic; Secure		LC	
<i>Pachydactylus turneri</i>	Turner's Thick-toed Gecko	Secure		LC	
<i>Pachydactylus punctatus</i>	Speckled Thick-toed Gecko	Secure		LC	
<i>Pachydactylus rugosus rugosus</i>	Rough Thick-toed Gecko	Endemic; Secure		LC	
<i>Pachydactylus weberi weneri</i>	Weber's Thick-toed Gecko	Endemic; Secure		LC	
<i>Ptenopus carpi</i>	Carp's Barking Gecko	Endemic; Secure		LC	
<i>Ptenopus garrulus maculatus</i>	Common Barking Gecko	Endemic; Secure		LC	
<i>Ptenopus kochi</i>	Koch's Barking Gecko	Endemic; Secure		LC	
<i>Phelsuma (Rhoptropus) afer</i>	Common Namib Day Gecko	Endemic; Secure			
<i>Phelsuma (Rhoptropus) boultoni</i>	Boulton's Namib Day Gecko	Endemic; Secure			
<i>Phelsuma (Rhoptropus) bradfieldi</i>	Bradfield's Namib Day Gecko	Endemic; Secure			

Namibian conservation and legal status according to the Nature Conservation Ordinance No 4 of 1975 (Griffin 2003)

Endemic – includes Southern African Status (Branch 1998)

SARDB (2004): S to V – Safe to Vulnerable; V – Vulnerable; P – Peripheral

IUCN (2022): LC – Least Concern [All other species not yet assessed]

CITES: CITES Appendix 2/3 species

Source for literature review: Alexander & Marais (2007), Branch (1998), Branch (2008), Bonin *et al.* (2006), Boycott & Bourquin (2000), Broadley (1983), Buys & Buys (1983), Cunningham (2006a), Griffin (2003), Hebbard (n.d.), IUCN (2022), Marais (1992), SARDB (2004), Schleicher (2020), Tolley & Burger (2007)

Species such as *Chamaeleonamaquensis*, various *Phelsuma (Rhoptropus)* and *Meroles* spp. are probably the only ones inhabiting the proposed GHDP area.

As reptiles are generally understudied animals and occur at low densities in such marginal habitat, many more species are expected to occur in the general GHDP area than included in Table 5-1. However, no reptiles are exclusively associated with the GHDP area.

Other areas:

As reptiles are viewed as an important group in the desert areas of Namibia the following unpublished reports are included from the general area:

Other reptile related work in the general area includes Henschel *et al.* (2006) from Gobabeb, Griffin (2005) from Valencia, Cunningham (2006b) from Trekkopje, Cunningham (2007) from Valencia, Cunningham (2010) from INCA and TRS, Cunningham (2011) from Khan River, Henschel *et al.* (2011) from Marenica, Cunningham (2013) from Ongolo and Tumas, Kavari (2007) from Rössing Uranium Mine, Cunningham (2019) from the Kuiseb River Delta area and Cunningham (2020) from Tumas area. Their findings are presented in the following tables:

According to Henschel *et al.* (2006) at least 20 species of lizards (12 geckos, 5 lizards and 3 skinks) have been recorded on the gravel plains at Gobabeb (Desert Research site approximately 70km southeast of the general GHDP area) (Table 5-13).

Table 5-2: Reptiles Recorded on the Gravel Plains at Gobabeb (Henschel et al., 2006)

Family and Scientific name	Common name
Gekkonidae	
<i>Chondrodactylus angulifer</i>	Giant Ground Gecko
<i>Pachydactylus kockii</i>	Koch's Thick-toed Gecko
<i>Pachydactylus turneri</i>	Turner's Thick-toed Gecko
<i>Pachydactylus scherzi</i>	Schertz's Thick-toed Gecko
<i>Pachydactylus rugosus</i>	Rough Thick-toed Gecko
<i>Pachydactylus rangei</i>	Palmato gecko
<i>Ptenopus carpi</i>	Banded Barking Gecko
<i>Ptenopus garrulus</i>	Common Barking Gecko
<i>Rhoptropus afer</i>	Common Namib Day Gecko
<i>Rhoptropus barnardi</i>	Lesser Namib Day Gecko
<i>Rhoptropus bradfieldi</i>	Bradfield's Namib Day Gecko
<i>Narudasia festiva</i>	Festive Gecko
Lacertidae	
<i>Meroles suborbitalis</i>	Spotted Desert Lizard
<i>Pedioplanis breviceps</i>	Short-headed Sand Lizard
<i>Pedioplanis lineocellata</i>	Ocellated Sand Lizard
<i>Pedioplanis namaquensis</i>	Namaqua Sand Lizard
<i>Pedioplanis undata</i>	Western Sand Lizard
Scincidae	
<i>Trachylepis acutilabris</i>	Wedge-snouted Skink
<i>Trachylepis occidentalis</i>	Western Three-striped Skink
<i>Trachylepis spilogaster</i>	Namibian Tree Skink

Table 5-3 indicates the reptile diversity known, reported and/or expected to occur (77 species) in the general Valencia Uranium area (approximately 50km northeast of the general GHDP area) as presented by Griffin (2005).

Table 5-3: Reptiles Reported and/or Expected to Occur in the General Valencia Area (Griffin & Coetzee, 2005)

Species: Scientific name	Common name
Turtles and Tortoises and Terrapins	
<i>Geochelone pardalis</i>	Leopard tortoise
<i>Pelomedusa subrufa</i>	Marsh/Helmeted Terrapin
Snakes	
Worm Snakes	
<i>Leptotyphlops occidentalis</i>	Western Thread/Worm Snake
<i>Leptotyphlops labialis</i>	Damara Thread/Worm Snake
<i>Leptotyphlops scutifrons</i>	Peter's Thread/Worm Snake
Blind Snakes	
<i>Rhinotyphlops lalandei</i>	Delalande's Blind Snake
<i>Rhinotyphlops schinzi</i>	Beaked Blind Snake
Boas and Pythons	
<i>Python anchietae</i>	Namibian Dwarf Python
Typical Snakes	
<i>Lamprophis fuliginosus</i>	Brown House Snake
<i>Pseudaspis cana</i>	Mole Snake
<i>Psammophylax rhombeatus</i>	Spotted Skaapsteker
<i>Dipsina multimaculata</i>	Dwarf Beaked Snake
<i>Psammophis trigrammus</i>	Western Sand Snake
<i>Psammophis notostictus</i>	Karoo Sand Snake
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake
<i>Psammophis subtaeniatus</i>	Western Striped-bellied Sand Snake
<i>Psammophis leopardinus</i>	Leopard Whip Snake
<i>Dasypeltis scabra</i>	Common/Rhombic Egg Eater
<i>Philothamnus semivariegatus</i>	Spotted Bush Snake
<i>Telescopus beetzii</i>	Namaqua Tiger Snake
<i>Telescopus semiannulatus</i>	Southern Tiger Snake
<i>Telescopus sp. nov.</i>	Damara Tiger Snake
<i>Pythonodipsas carinata</i>	Western keeled Snake
<i>Prosymna frontalis</i>	Shouthwestern Shovel-snout
<i>Aspidelaps lubricus infuscatus</i>	Coral Snake
<i>Aspidelaps scutatus scutatus</i>	Shield-nose Snake
<i>Naja anchietae</i>	Angolan Cobra
<i>Naja nigricollis nigricincta</i>	Black-necked Spitting Cobra
<i>Naja woodi</i>	Black Spitting Cobra
<i>Naja nivea</i>	Cape Cobra

Species: Scientific name	Common name
<i>Dendroaspis polylepis</i>	Black Mamba
<i>Bitis arietans</i>	Puff Adder
<i>Bitis caudalis</i>	Horned Adder
Lizards	
Worm Lizards	
<i>Zygaspis quadrifrons</i>	Kalahari Round-headed Worm Lizard
Skinks	
<i>Trachylepis acutilabris</i>	Wedge-snouted Skink
<i>Trachylepis occidentalis</i>	Western Three-striped Skink
<i>Trachylepis hoeschi</i>	Western Rock Skink
<i>Trachylepis spilogaster</i>	Namibian Tree Skink
<i>Trachylepis sulcata</i>	Western Rock Skink
<i>Trachylepis variegata variegata</i>	Variegated Skink
<i>Trachylepis wahlbergii</i>	Wahlberg's Striped Skink
Old World Lizards	
<i>Nucras intertexta</i>	Spotted Sandveld Lizard
<i>Heliobolus lugubris</i>	Bushveld Lizard
<i>Meroles knoxii</i>	Round-snouted Sand Lizard
<i>Meroles cuneirostris</i>	Wedge-snouted Desert Lizard
<i>Meroles suborbitalis</i>	Spotted Desert Lizard
<i>Pedioplanis breviceps</i>	Short-headed Sand Lizard
<i>Pedioplanis lineocellata</i>	Ocellated Sand Lizard
<i>Pedioplanis namaquensis</i>	Namaqua Sand Lizard
<i>Pedioplanis gaerdesi</i>	Damara Sand Lizard
<i>Pedioplanis undata</i>	Western Sand Lizard
<i>Pedioplanis inornata</i>	Plain Sand Lizard
<i>Pedioplanis hasabensis</i>	Husab Sand Lizard
Plated Lizards	
<i>Cordylus subtaeniatus</i>	Dwarf Plated Lizard
<i>Gerrhosaurus nigrolineatus</i>	Black-lined Plated Lizard
<i>Gerrhosaurus validus</i>	Giant Plated Lizard
Monitors	
<i>Varanus albigularis</i>	Rock Monitor
Agamas	
<i>Agama anchietae</i>	Western Rock Agama
<i>Agama planiceps</i>	Namibian Rock Agama
Chameleons	
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon
Geckos	
<i>Afroedura africana africana</i>	African Flat Gecko
<i>Chondrodactylus angulifer namibensis</i>	Giant Ground Gecko

Species: Scientific name	Common name
<i>Narudasia festiva</i>	Festive Gecko
<i>Pachydactylus bicolour</i>	Velvety Thick-toed Gecko
<i>Pachydactylus capensis</i>	Cape Thick-toed Gecko
<i>Pachydactylus fasciatus</i>	Damaraland Banded Thick-toed Gecko
<i>Pachydactylus kockii</i>	Koch's Thick-toed Gecko
<i>Pachydactylus punctatus</i>	Speckled Thick-toed Gecko
<i>Pachydactylus turneri</i>	Turner's Thick-toed Gecko
<i>Pachydactylus scherzi</i>	Schertz's Thick-toed Gecko
<i>Pachydactylus rugosus rugosus</i>	Rough Thick-toed Gecko
<i>Pachydactylus weberi</i>	Weber's Thick-toed Gecko
<i>Lygodactylus bradfieldi</i>	Namibian Dwarf Gecko
<i>Ptenopus garrulus maculatus</i>	Common Barking Gecko
<i>Rhoptropus afer</i>	Common Namib Day Gecko
<i>Rhoptropus barnardi</i>	Lesser Namib Day Gecko
<i>Rhoptropus bradfieldi</i>	Bradfield's Namib Day Gecko

A survey of the reptiles associated with the Trekkopje Uranium Mining area (approximately 110km northeast of the general GHDP area) conducted by Cunningham (2006b) indicated the presence of 22 reptiles species (8 snakes, 1 skink, 2 lizards, 2 agamas, 1 chameleon and 8 geckos) (Table 5-4).

Table 5-4: Reptiles Recorded in the General Trekkopje Uranium Mining Area (Cunningham, 2006b)

Species: Scientific name	Species: Common name
Typical Snakes	
<i>Lamprophis fuliginosus</i>	Brown House Snake
<i>Lycophidion namibianum</i>	Namibian Wolf Snake
<i>Dipsina multimaculata</i>	Dwarf Beaked Snake
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake
<i>Dasypeltis scabra</i>	Common Egg Eater
<i>Aspidelaps lubricus infuscatus</i>	Coral Snake
<i>Naya nigricincta</i>	Black-necked Spitting Cobra
<i>Bitis caudalis</i>	Horned Adder
Lizards	
Skinks	
<i>Trachylepis acutilabris</i>	Wedge-snouted Skink
Old World Lizards	
<i>Pedioplanis namaquensis</i>	Namaqua Sand Lizard
<i>Pedioplanis husabensis</i>	Husab Sand Lizard
Agamas	
<i>Agama aculeata</i>	Ground Agama
<i>Agama anchietae</i>	Anchieta's Agama
Chameleons	
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon

Species: Scientific name	Species: Common name
Geckos	
<i>Chondrodactylus angulifer namibensis</i>	Giant Ground Gecko
<i>Lygodactylus bradfieldi</i>	Bradfield's Dwarf Gecko
<i>Pachydactylus bicolor</i>	Velvety Thick-toed Gecko
<i>Pachydactylus serval serval</i>	Western Spotted Thick-toed Gecko
<i>Ptenopus carpi</i>	Carp's Barking Gecko
<i>Rhoptropus afer</i>	Common Namib Day Gecko
<i>Rhoptropus boultoni</i>	Boulton's Namib Day Gecko
<i>Rhoptropus bradfieldi</i>	Bradfield's Namib Day Gecko

A survey of the reptiles associated with the Valencia Mine (approximately 50km northeast of the general GHDP area) conducted by Cunningham (2007) indicated the presence of 14 reptile species (5 snakes, 2 skinks, 1 lizard, 1 agama, 1 chameleon and 4 geckos) (Table 5-5).

Table 5-5: Reptiles recorded in the general Valencia area (Cunningham, 2007)

Species: Scientific name	Species: Common name
Typical Snakes	
<i>Lamprophis fuliginosus</i>	Brown House Snake
<i>Psammophis trigrammus</i>	Western Sand Snake
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake
<i>Aspidelaps lubricus infuscatus</i>	Coral Snake
<i>Bitis caudalis</i>	Horned Adder
Lizards	
Skinks	
<i>Trachylepis hoeschi</i>	Western Rock Skink
<i>Trachylepis sulcata</i>	Western Rock Skink
Old World Lizards	
<i>Pedioplanis husabensis</i>	Husab Sand Lizard
Agamas	
<i>Agama anchietae</i>	Anchieta's Agama
Chameleons	
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon
Geckos	
<i>Chondrodactylus angulifer namibensis</i>	Giant Ground Gecko
<i>Pachydactylus turneri</i>	Turner's Thick-toed Gecko
<i>Ptenopus garrulus maculatus</i>	Common Barking Gecko
<i>Rhoptropus bradfieldi</i>	Bradfield's Namib Day Gecko

A survey of the reptiles associated with the INCA Uranium and Iron (INCA) and Tubas Red Sands Uranium (TRS) sites (approximately 40km northeast of the general GHDP area) conducted by Cunningham (2010) indicated the presence of 14 reptile species (3 snakes, 1 skink, 2 lizards, 1 chameleon and 7 geckos) (Table 5-6).

Table 5-6: Reptiles Recorded in the General INCA and TRS Areas (Cunningham, 2010)

Family and Scientific name	Common name
Typical Snakes	
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake
<i>Naya nigricincta</i>	Black-necked Spitting Cobra
<i>Bitis caudalis</i>	Horned Adder
Lizards	
Skinks	
<i>Trachylepis acutilabris</i>	Wedge-snouted Skink
Old World Lizards	
<i>Meroles suborbitalis</i>	Spotted Desert Lizard
<i>Pedioplanis inornata</i>	Plain Sand Lizard
Chameleons	
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon
Geckos	
<i>Chondrodactylus angulifer namibensis</i>	Giant Ground Gecko
<i>Pachydactylus bicolor</i>	Velvety Thick-toed Gecko
<i>Pachydactylus kochii</i>	Kock's Thick-toed Gecko
<i>Pachydactylus punctatus</i>	Speckled Thick-toed Gecko
<i>Ptenopus carpi</i>	Carp's Barking Gecko
<i>Ptenopus garrulus maculatus</i>	Common Barking Gecko
<i>Rhoptropus afer</i>	Common Namib Day Gecko

A survey of the reptiles associated with the Khan River area (approximately 40km northeast of the general GHDP area) conducted by Cunningham (2011) indicated the presence of 6 reptile species (2 skinks, 1 lizard, 1 agama and 2 geckos) (Table 5-7).

Table 5-7: Reptiles Recorded in the General Khan River Area (Cunningham, 2011)

Species: Scientific name	Species: Common name
LIZARDS	
Skinks	
<i>Trachylepis variegata variegata</i>	Variegated Skink
<i>Trachylepis hoeschi</i>	Hoesch' Skink
Old World Lizards	
<i>Meroles suborbitalis</i>	Spotted Desert Lizard
Agama	
<i>Agama planiceps</i>	Namibian Rock Agama
Geckos	
<i>Rhoptropus afer</i>	Common Namib Day Gecko
<i>Rhoptropus boultoni</i>	Boulton's Namib Day Gecko

A survey of the reptiles associated with the Marenica Mining site in the Spitzkoppe area (approximately 170km northeast of the general GHDP area) conducted by Henschel *et al.* (2011) indicated the presence of 19 reptiles species (1 snake, 5 skinks, 6 lizards, 2 agamas, 1 chameleon and 4 geckos) (Table 5-8).

Table 5-8: Reptiles recorded in the general Marenica (Spitzkoppe) area (Henschel et al., 2011)

Family and Scientific name	Common name
Typical Snakes	
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake
Lizards	
Skinks	
<i>Trachylepis acutilabris</i>	Wedge-snouted Skink
<i>Trachylepis occidentalis</i>	Western Three-striped Skink
<i>Trachylepis hoeschi</i>	Western Rock Skink
<i>Trachylepis spilogaster</i>	Namibian Tree Skink
<i>Trachylepis variegata variegata</i>	Variegated Skink
Old World Lizards	
<i>Pedioplanis breviceps</i>	Short-headed Sand Lizard
<i>Pedioplanis inornata</i>	Plain Sand Lizard
<i>Pedioplanis namaquensis</i>	Namaqua Sand Lizard
Agamas	
<i>Agama anchietae</i>	Anchieta's Agama
<i>Agama planiceps</i>	Namibian Rock Agama
Chameleons	
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon
Geckos	
<i>Chondrodactylus angulifer namibensis</i>	Giant Ground Gecko
<i>Pachydactylus bicolor</i>	Velvety Thick-toed Gecko
<i>Pachydactylus turneri</i>	Turner's Thick-toed Gecko
<i>Pachydactylus scherzi</i>	Schertz's Thick-toed Gecko
<i>Ptenopus garrulus maculatus</i>	Common Barking Gecko
<i>Rhoptropus boultoni</i>	Boulton's Namib Day Gecko
<i>Rhoptropus bradfieldi</i>	Bradfield's Namib Day Gecko

A survey of the reptiles associated with the Ongolo and Tumas sites (approximately 60km northeast of the general GHDP area) conducted by Cunningham (2013) indicated the presence of 26 reptile species (6 snakes, 3 skinks, 6 lizards, 1 monitor, 1 chameleon and 9 geckos) (Table 5-9).

Table 5-9: Reptiles Recorded in the General Ongolo and Tumas Areas (Cunningham, 2013)

Family and Scientific name	Common name
Typical Snakes	
<i>Dipsina multimaculata</i>	Dwarf Beaked Snake
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake
<i>Aspidelaps lubricus infuscatus</i>	Coral Snake
<i>Naya nigricincta</i>	Black-necked Spitting Cobra
<i>Bitis arietans</i>	Puff Adder
<i>Bitis caudalis</i>	Horned Adder
LIZARDS	
Skinks	
<i>Trachylepis acutilabris</i>	Wedge-snouted Skink
<i>Trachylepis sulcata</i>	Western Rock Skink
<i>Trachylepis variegata variegata</i>	Variegated Skink
Old World Lizards	
<i>Meroles reticulatus</i>	Reticulated Desert Lizard
<i>Meroles suborbitalis</i>	Spotted Desert Lizard
<i>Pedioplanis breviceps</i>	Short-headed Sand Lizard
<i>Pedioplanis namaquensis</i>	Namaqua Sand Lizard
<i>Pedioplanis inornata</i>	Plain Sand Lizard
<i>Pedioplanis husabensis</i>	Husab Sand Lizard
Monitors	
<i>Varanus albigularis</i>	Rock or White-throated Monitor
Chameleons	
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon
Geckos	
<i>Chondrodactylus angulifer namibensis</i>	Giant Ground Gecko
<i>Pachydactylus bicolor</i>	Velvety Thick-toed Gecko
<i>Pachydactylus kochii</i>	Kock's Thick-toed Gecko
<i>Pachydactylus turneri</i>	Turner's Thick-toed Gecko
<i>Pachydactylus punctatus</i>	Speckled Thick-toed Gecko
<i>Ptenopus carpi</i>	Carp's Barking Gecko
<i>Ptenopus garrulus maculatus</i>	Common Barking Gecko
<i>Rhoptropus afer</i>	Common Namib Day Gecko
<i>Rhoptropus boultoni</i>	Boulton's Namib Day Gecko

A pilot study conducted by Kavari (2007) on the reptile diversity associated with the future expansion of the Rössing Uranium Mine (approximately 50km northeast of the general GHDP area) indicated the presence of 6 reptile species (3 geckos, 1 lizard, 1 chameleon and 1 snake) (Table 5-10).

Table 5-10: Reptiles Recorded in the General Rössing Uranium Mine Area (Kavari, 2007)

Family and Scientific name	Common name
Typical snakes	
<i>Psammophis notostictus</i>	Karoo Sand Snake
Geckkonidae	
<i>Trachylepis variegata variegata</i>	Variegated Skink
<i>Trachylepis hoeschi</i>	Western Rock Skink
<i>Ptenopus garrulus</i>	Common Barking Gecko
Lacertidae	
<i>Pedioplanis hasabensis</i>	Husab Sand Lizard
Chameleons	
<i>Chamaeleo namaquensis</i>	Namaqua Chameleon

A survey of the reptiles associated with the Kuiseb River Delta area (approximately 25km southwest of the general GHDP area) conducted by Cunningham (2019) indicated the presence of 5 reptile species (2 snakes, 1 burrowing skink, 1 typical skink and 1 lizard) (Table 5-11).

Table 5-11: Reptiles Recorded in the General Kuiseb River Delta Area, (Cunningham, 2019)

Family and Scientific name	Common name
Typical snakes	
<i>Bitis arietans</i>	Puff Adder
<i>Bitis caudalis</i>	Horned Adder
Skinks	
<i>Typhlacontias brevipes</i>	FitzSimmons' Burrowing Skink
<i>Trachylepis variegata variegata</i>	Variegated Skink
Lacertidae	
<i>Meroles reticulatus</i>	Reticulated Desert Lizard

A survey of the reptiles associated with the Tumas area (approximately 50km east/northeast of the general GHDP area) conducted by Cunningham (2020) indicated the presence of 6 reptile species (1 snake, 2 skinks, 1 lizard and 2 geckos) (Table 5-12).

Table 5-12: Reptiles Recorded in the General Tumas Area (Cunningham, 2020)

Family and Scientific name	Common name
Typical snakes	
<i>Psammophis leightoni namibensis</i>	Namib Sand Snake
Skinks	
<i>Typhlacontias brevipes</i>	FitzSimmons' Burrowing Skink
<i>Trachylepis sulcata</i>	Western Rock Skink
Old World Lizards	
<i>Meroles reticulatus</i>	Reticulated Desert Lizard
Geckos	
<i>Phelsuma (Rhoptropus) afer</i>	Common Namib Day Gecko
<i>Phelsuma (Rhoptropus) bradfieldi</i>	Bradfield's Namib Day Gecko

Amphibian Diversity

Amphibian diversity known and/or expected to occur in the general GHDP area (literature study only), is presented in Table 5-13.

Amphibians are declining throughout the world due to various factors of which much has been ascribed to habitat destruction. Basic species lists for various habitats are not always available with Namibia being no exception in this regard while the basic ecology of most species is also unknown. Approximately 4,000 species of amphibians are known worldwide with just over 200 species known from southern Africa and at least 57 species expected to occur in Namibia. Griffin (1998b) puts this figure at 50 recorded species and a final species richness of approximately 65 species, 6 of which are endemic to Namibia. This “low” number of amphibians from Namibia is not only as a result of the generally marginal desert habitat, but also due to Namibia being under studied and under collected. Most amphibians require water to breed and are therefore associated with the permanent water bodies, mainly in northeast Namibia. Desert areas and saline soils/pans are marginal habitat for amphibians (Cunningham & Jankowitz, 2010).

According to Mendelsohn *et al.* (2002), the overall frog diversity in the general area is estimated at between 1-3 species. Griffin (1998b) puts the species richness in the general area at 2 species.

At least 5 species of amphibians can occur in suitable habitat in the general area (Du Preez & Carruthers, 2009). The area is underrepresented, with 2 toads and 1 species each for rubber, sand and platanna known and/or expected to occur in the area (i.e., potentially could be found in the area). Of these, 2 species are endemic (*Poyntonophrynushoeschi* and *Phrynomantisannectens*) (Griffin, 1998b) – i.e., high level (40%) of amphibians of conservation value from the general area. The IUCN (2022) classifies all the species as least concern.

The most important species are the 2 endemics although they are widespread throughout Namibia and not specifically associated with the GHDP area. Overall suitable habitat for amphibians in the general area is viewed as the ephemeral Khan, Kuiseb, Swakop and Tumas Rivers and their tributaries. Temporary pools after localised rainfall events could potentially serve as habitat for amphibians throughout the area while leakages from the various NamWater pipelines could also serve as a habitat, albeit artificial. None of the unique/important amphibian species are exclusively associated with the proposed GHDP area.

Table 5-13: Amphibian Diversity Known and/or Expected to Occur in the General GHDP Project Area – Literature Study

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status – IUCN
Toads			
<i>Amietophrynus poweri</i>	Western Olive Toad		LC
<i>Poyntonophrynus hoeschi</i>	Hoesch's Pygmy Toad	Endemic	LC
Rubber Frog			
<i>Phrynomantis annectens</i>	Marbled Rubber Frog	Endemic	LC
Sand Frogs			
<i>Tomopterna tandyi</i>	Tandy's Sand Frog		LC
Platannas			
<i>Xenopus laevis</i>	Common Platanna		LC

Endemic – Griffin (1998b)

IUCN (2022): LC – Least Concern

Source for literature review: Carruthers (2001), Channing (2001), Channing & Griffin (1993), Du Preez & Carruthers (2009), Griffin & Coetzee (2005), IUCN (2022), Passmore & Carruthers (1995)

The area is extremely marginal with very little rainfall generally occurring in the area (<50mm annual average) and being highly variable (>100% coefficient of variation) and sporadic of nature (Mendelsohn *et al.*, 2002). Very little surface water collects in the Tumas River and its tributaries with few other natural sources (e.g., temporary pools in granite hollows, etc.) available in this ravel plain dominated habitat. Furthermore, no amphibians were observed by Cunningham (2010, 2013, 2019, 2020) at adjacent sites nor in the Marenicaarea (Spitzkoppe area) (Henschel *et al.*, 2011), either.

However, the general area undoubtedly has suitable, albeit temporary of nature, amphibian habitat during the rainy season (or where rainfall does occur) when pools could collect in the Tumas River and its tributaries and more especially in rocky hollows. The amphibians expected to occur in the general area are however not exclusively associated with the GHDP area with the 2 endemics that could potentially occur in the area occurring widespread throughout Namibia and not specifically associated with the proposed development sites.

Mammal Diversity

Mammal diversity known and/or expected to occur in the GHDP area (literature study only), is presented in Table 5-14.

Namibia is well endowed with mammal diversity with at least 250 species occurring in the country. These include the well-known big and hairy as well as a legion of smaller and lesser-known species. Currently 14 mammal species are considered endemic to Namibia of which 11 species are rodents and small carnivores of which very little is known. Most endemic mammals are associated with the Namib and escarpment with 60% of these rock-dwelling (Griffin, 1998c). According to Griffin (1998c) the endemic mammal fauna is best characterized by the endemic rodent family *Petromuridae* (Dassie rat) and the rodent genera *Gerbillurus* and *Petromyscus*.

Overall terrestrial diversity and endemism – all species – is classified as low to average respectively in the central western central part of Namibia (Mendelsohn *et al.*, 2002). The overall diversity (1-2 species) and abundance of large herbivorous mammals is low in the general area with oryx and springbok having the highest density of the larger species (Mendelsohn *et al.*, 2002). The overall abundance and diversity of large carnivorous mammals is average (4 species) in the general area with brown hyena having the highest density of the larger species (Mendelsohn *et al.*, 2002). The overall mammal diversity in the general area is estimated at between 16-30 species with 3-4 species being

endemic to the area (Mendelsohn *et al.*, 2002). Griffin (1998c) puts the species richness distribution of endemics also between 3-4 species in the general area while the Namib-Naukluft Park has an estimated 80 species in total and the Skeleton Coast National Park has at least 87 species of mammals.

At least 49 species of mammals are known and/or expected to occur in the general area of which 8 species (16.3%) are classified as endemic. The Namibian legislation classifies 5 species as vulnerable, 1 species as rare, 2 species as insufficiently known, 1 species as specially protected game, 5 species as protected game, 4 species as huntable game, 3 species as problem animals, 1 species as invasive alien, 1 species as a migrant and 1 species is not listed. At least 28.6% (14 species) of the mammalian fauna that occur or are expected to occur in general area are represented by rodents of which 3 species (21.4%) are endemic. This is followed by bats with 13 species (26.5%) of which 1 species is listed as endemic and rare (7.7%) and carnivores with 11 species (22.5%) of which 1 species (9.1%) is endemic and 5 species listed as vulnerable (45.5%).

The IUCN (2022) classifies 3 species as vulnerable (*Acinonyx jubatus*, *Panthera pardus*, *Equus zebra hartmannae*) and 2 species as near threatened (*Eidolon helvum*, *Parahyaena (Hyaena) brunnea*) and the rest as least concern and/or have not yet been assessed for the Red List while 1 species is classified as endangered, 2 species as vulnerable and 7 species as near threatened and by the SARDB (2004) and 6 species as either CITES Appendix 1 (2 species) and 2 (4 species) species. The house mouse (*Mus musculus*) is viewed as an invasive alien species to the area. *Mus musculus* are generally known as casual pests and not viewed as problematic although they are known carriers of “plague” and can cause economic losses (Picker & Griffiths, 2011). Although the brown and house rats are expected to occur in Walvis Bay and Swakopmund, they are commensally with humans and could occur in the general area although they probably do not occur in the open gravel plain areas.

The most important species from the general area are the Namibian wing-gland bat (*Cistugoseabrae*) listed as endemic and rare; Littledale's whistling rat (*Protomyslittledaleinamibensis*) – of which the subspecies “*namibensis*” is known to occur in the ephemeral river courses in the “Swakopmund area” Griffin (2003) – listed as endemic; brown hyena (*Parahyaenabrunnea*) and leopard (*Parthera pardus*) listed as near threatened and vulnerable (population trends decreasing), respectively by the IUCN (2022). However, leopard is only expected to occasionally pass through the area as the general gravel plain area is not viewed as favoured habitat. Hartmann's mountain zebra is known to occur further inland (westwards – i.e., Tumas and Langer Heinrich areas, etc.) and do not frequent the barren gravel plains close to the coast.

Habitat alteration and overutilization are the two primary processes threatening most mammals (Griffin 1998c) with species probably underrepresented in the above-mentioned table for the general area being the bats and rodents, as these groups have not been well documented from the arid central western part of Namibia.

However, none of the mammal species known and/or expected to occur in the general area are exclusively associated with the GHDP area.

Table 5-14: Mammal Diversity Expected to Occur in the General GHDP Area – Literature Study

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status		
			SARDB	IUCN	CITES
Elephant Shrews					
<i>Macroscelides (proboscideus) flavicaudatus</i>	Round-eared Elephant-shrew	Endemic; Secure		LC	
Aardvark					
<i>Orycteropus afer</i>	Aardvark	Secure; Protected Game		LC	
Bats					
<i>Eidolon helvum</i>	African Straw-coloured Fruit Bat	Secure; Migrant		NT	
<i>Rhinolophus darlingi</i>	Darling's Horseshoe Bat	Secure; Peripheral	NT	LC	
<i>Rhinolophus fumigatus</i>	Rüppell's Horseshoe Bat	Secure	NT	LC	
<i>Taphozous mauritanus</i>	Mauritian Tomb Bat	Secure		LC	
<i>Nycteris thebaica</i>	Egyptian Slit-faced Bat	Secure		LC	
<i>Sauromys petrophilus</i>	Robert's Flat-headed Bat	Secure		LC	
<i>Tadarida aegyptiaca</i>	Egyptian Free-tailed Bat	Secure		LC	
<i>Miniopterus natalensis</i>	*Natal Long-fingered Bat	Secure	NT	LC	
<i>Cistugo seabrae</i>	*Namibian Wing-gland Bat	Endemic; Rare	V	LC	
<i>Eptesicus hottentotus</i>	Long-tailed Serotine Bat	Secure		LC	
<i>Mimetillus thomasi</i>	Thomas's Flat-headed Bat	Not listed			
<i>Neoromicia zuluensis</i>	Zulu Serotine Bat	Secure		LC	
<i>Pipistrellus rueppellii</i>	Rüppell's Pipistelle Bat	Insufficiently known; Peripheral		LC	
Hares and Rabbits					
<i>Lepus capensis</i>	Cape Hare	Secure		LC	
Porcupine					
<i>Hystrix africaustralis</i>	Porcupine	Secure		LC	
Rats and Mice					
<i>Petromys typicus</i>	Dassie Rat	Endemic; Secure	NT		
<i>Pedetes capensis</i>	Springhare	Secure		LC	

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status		
			SARDB	IUCN	CITES
<i>Rhabdomys pumilio</i>	Four-striped Grass Mouse	Secure		LC	
<i>Mastomys coucha</i>	Southern Multimammate Mouse	Secure		LC	
<i>Aethomys chrysophilus</i>	Red Veld Rat	Secure		LC	
<i>Aethomys namaquensis</i>	Namaqua Rock Mouse	Secure		LC	
<i>Protomys littledalei namibensis</i>	Littledale's Whistling Rat	Endemic	NT		
<i>Desmodillus auricularis</i>	Cape Short-tailed Gerbil	Secure		LC	
<i>Gerbillurus paeba</i>	Hairy-footed Gerbil	Secure		LC	
<i>Gerbillurus setzeri</i>	Setzer's Hairy-footed Gerbil	Endemic		LC	
<i>Petromyscus collinus</i>	Pygmy Rock Mouse	Endemic; Secure		LC	
<i>Mus musculus</i>	House Mouse	Invasive alien		LC	
Primates					
<i>Papio ursinus</i>	Chacma Baboon	Secure; Problem animal		LC	C2
Carnivores					
<i>Parahyaena (Hyaena) brunnea</i>	Brown Hyena	Insufficiently known; (Vulnerable?); Peripheral	NT	NT	
<i>Crocuta crocuta</i>	Spotted Hyena	Secure?; Peripheral	NT	LC	
<i>Felis silvestris</i>	African Wild Cat	Vulnerable		LC	C2
<i>Suricata suricatta marjoriae</i>	Suricate	Endemic; Secure		LC	
<i>Otocyon megalotis</i>	Bat-eared Fox	Vulnerable(?); Peripheral; Protected Game		LC	
<i>Vulpes chama</i>	Cape Fox	Vulnerable?		LC	
<i>Canis mesomelas</i>	Black-backed Jackal	Secure; Problem animal		LC	
<i>Ictonyx striatus</i>	Striped Polecat	Secure		LC	
<i>Mellivora capensis</i>	Ratel	Secure; Protected Game		LC	
<i>Acinonyx jubatus</i>	Cheetah	Vulnerable; Protected Game	V	V	C1
<i>Caracal caracal</i>	Caracal	Secure; Problem animal		LC	C2
<i>Panthera pardus</i>	Leopard	Secure(?); Peripheral; Protected Game		V	C1
Pigs					

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status		
			SARDB	IUCN	CITES
<i>Phacochoerus africanus</i>	Warthog	Secure; Hunttable game		LC	
Zebra					
<i>Equus zebra hartmannae</i>	Hartmann's Mountain Zebra	Endemic; Secure; Specially Protected Game	E	V	C2
Antelopes					
<i>Oryx gazella</i>	Gemsbok	Secure; Hunttable game		LC	
<i>Tragelaphus strepsiceros</i>	Kudu	Secure; Hunttable game		LC	
<i>Sylvicapra grimmia</i>	Common Duiker	Secure		LC	
<i>Antidorcas marsupialis</i>	Springbok	Secure; Hunttable game		LC	
<i>Raphicerus campestris</i>	Steenbok	Secure; Protected Game		LC	

SARDB (2004): NT – Near Threatened, V – Vulnerable

IUCN (2022): V – Vulnerable, NT – Near Threatened, All the other species are listed as LC – Least Concern or not yet been assessed for the Red List.

CITES: CITES Appendix 1 or 2 species

* - Monadhem *et al.* (2010): NT – Near Threatened

Source for literature review: De Graaff (1981), Estes (1995), Frost (2014), Griffin & Coetzee (2005), IUCN (2022), Joubert & Mostert (1975), Monadhem *et al.* (2010), Picker & Griffiths (2011), Skinner & Smithers (1990), Skinner & Chimimba (2005), Stander & Hannsen (2003) and Taylor (2000)

Bird Diversity

Bird diversity known and/or expected to occur in the general GHDP area (literature study only), is presented in Table 5-15. This table excludes coastal marine birds although some may occasionally occur in the area (e.g. gulls and terns), migratory birds (e.g., Petrel, Albatross, Skua, etc.) and species breeding extralimital (e.g., stints, sandpipers, etc.) and rather focuses on birds that are breeding residents or can be found in the area during any time of the year. This would imply that many more birds (e.g., Palearctic migrants) could occur in the area depending on “favourable” environmental conditions.

Although Namibia’s avifauna is comparatively sparse compared to the high rainfall equatorial areas elsewhere in Africa, approximately 658 species have already been recorded with a diverse and unique group of arid endemics (Brown *et al.*, 1998, Maclean, 1985). Fourteen species of birds are endemic or near endemic to Namibia with the majority of Namibian endemics occurring in the savannas (30%) of which ten species occur in a north-south belt of dry savannah in central Namibia (Brown *et al.*, 1998).

Bird diversity is viewed as “average” in the general area with 141-170 species estimated and 1-3 species being endemic (Mendelsohn *et al.*, 2002). Simmons (1998a) suggests 4-6 endemic species and a low to average ranking for southern African endemics and high ranking for southern African red data birds expected from the general area. The Bannerman Water Supply Pipeline Project area does not fall within an Important Birding Area (IBA). Important Birding Areas, which are in the general vicinity include Walvis Bay (global IBA status), Sandwich Harbour (global IBA status), 30 km beach (national IBA status) and the Mile 4 Saltworks (global IBA status) (Simmons 1998a) all approximately 20-50km towards the southwest and/or northwest along the coast.

At least 130 species of terrestrial [“breeding residents”] birds occur and/or could occur in the general area at any time (Hockey *et al.*, 2006; Maclean, 1985; Tarboton, 2001). All the migrant and aquatic species have been excluded here. Seven of the 14 Namibian endemics are expected to occur in the general area (50% of all Namibian endemic species or 5.4% of all the species expected to occur in the area). However, Simmons *et al.* (2015) indicates that Rüppell’s parrot is viewed as near endemic. Furthermore, Simmons *et al.* (2015) list 7 species as endangered (Ludwig’s bustard, white-backed vulture, black harrier, martial eagle, tawny eagle, booted eagle, black stork), 2 species as vulnerable (Lappet-faced vulture, secretary bird) and 5 species as near threatened (Rüppell’s parrot, Cape eagle owl, kori bustard, Verreaux’s eagle and peregrine falcon). Other important species known to occur in the general area but not included in Table 5-15 are maccoa duck (NT) and great white pelican (V). Both these species are however aquatic species and not expected to occur in the GHDP area, but probably only pass over on their way to the coast.

Forty-three species have a southern African conservation rating with 9 species classified as endemic (20.1% of southern African endemics or 7% of all the birds expected) and 34 species classified as near endemic (79.1% of southern African endemics or 26.2% of all the birds expected) (Hockey *et al.* 2006). The IUCN (2022) lists 1 species as critically endangered (white-backed vulture), 5 species as endangered (Ludwig’s bustard, lappet-faced vulture, martial eagle, black harrier, secretarybird), 1 species as vulnerable (tawny eagle,) and 1 species as near threatened (kori bustard) (All other species are listed as Least Concern and/or not yet been assessed by the Red List).

Table 5-15: Avian Diversity Expected to Occur in the General GHDP Area – Literature Study

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status	
			Southern Africa	IUCN
<i>Struthio camelus</i>	Common Ostrich			
<i>Pternistis adspersus</i>	Red-billed Spurfowl		N-end	
<i>Numida meleagris</i>	Helmeted Guineafowl			
<i>Dendropicos namaquus</i>	Bearded Woodpecker			
<i>Tockus monteiri</i>	Monteiro's Hornbill	End		
<i>Tockus damarensis</i>	Damara Hornbill	End	N-end	
<i>Tockus leucomelas</i>	Southern yellow-billed Hornbill		N-end	
<i>Tockus nasutus</i>	African Grey Hornbill			
<i>Upupa africana</i>	African Hoopoe			
<i>Phoeniculus purpureus</i>	Green Wood-Hoopoe			
<i>Rhinopomastus cyanomelas</i>	Common Scimitarbill			
<i>Colius colius</i>	White-backed Mousebird		End	
<i>Urocolius indicus</i>	Red-faced Mousebird			
<i>Poicephalus rueppellii</i>	Rüppell's Parrot	End; NT	N-end	
<i>Agapornis roseicollis</i>	Rosy-faced Lovebird	End	N-end	
<i>Cypsiurus parvus</i>	African Palm Swift			
<i>Tachymartus melba</i>	Alpine Swift			
<i>Apus bradfieldi</i>	Bradfield's Swift		N-end	
<i>Apus affinis</i>	Little Swift			
<i>Apus caffer</i>	White-rumped Swift			
<i>Corythaixoides concolor</i>	Grey Go-away Bird			
<i>Tyto alba</i>	Barn Owl			
<i>Ptilopsis granti</i>	Southern White-faced Scops Owl			
<i>Bubo capensis</i>	Cape Eagle-Owl	NT		

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status	
			Southern Africa	IUCN
<i>Bubo africanus</i>	Spotted Eagle Owl			
<i>Bubo lacteus</i>	Verreaux's Eagle-Owl			
<i>Glaucidium perlatum</i>	Pearl-spotted Owlet			
<i>Asio capensis</i>	Marsh Owl			
<i>Columba livia</i>	Rock Dove			
<i>Columba guinea</i>	Speckled Pigeon			
<i>Streptopelia capicola</i>	Cape Turtle Dove			
<i>Streptopelia senegalensis</i>	Laughing Dove			
<i>Oena capensis</i>	Namaqua Dove			
<i>Neotis ludwigii</i>	Ludwig's Bustard	E	N-end	E
<i>Ardeotis kori</i>	Kori Bustard	NT		NT
<i>Eupodotis rueppellii</i>	Rüppell's Korhaan	End	N-end	
<i>Pterocles namaqua</i>	Namaqua Sandgrouse		N-end	
<i>Pterocles bicinctus</i>	Double-banded Sandgrouse		N-end	
<i>Vanellus armatus</i>	Blacksmith Lapwing			
<i>Rhinoptilus africanus</i>	Double-banded Courser			
<i>Elanus caeruleus</i>	Black-shouldered Kite			
<i>Aegypius tracheliotos</i>	Lappet-faced Vulture	V		E
<i>Gyps africanus</i>	White-backed Vulture	E		CE
<i>Circaetus pectoralis</i>	Black-chested Snake-Eagle			
<i>Melierax canorus</i>	Southern Pale Chanting Goshawk		N-end	
<i>Melierax gabar</i>	Gabar Goshawk			
<i>Accipiter badius</i>	Shikra			
<i>Circus maurus</i>	Black Harrier	E	End	E
<i>Buteo augur</i>	Augur Buzzard			

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status	
			Southern Africa	IUCN
<i>Aquila verreauxii</i>	Verreaux's Eagle	NT		
<i>Polemaetus bellicosus</i>	Martial Eagle	E		E
<i>Aquila rapax</i>	Tawny Eagle	E		V
<i>Aquila pennatus</i>	Booted Eagle	E		
<i>Sagittarius serpentarius</i>	Secretarybird	V		E
<i>Falco rupicolus</i>	Rock Kestrel			
<i>Falco rupicoloides</i>	Greater Kestrel			
<i>Falco chicquera</i>	Red-necked Falcon			
<i>Falco biarmicus</i>	Lanner Falcon			
<i>Falco peregrinus</i>	Peregrine Falcon	NT		
<i>Ciconia nigra</i>	Black Stork	E		
<i>Egretta garzetta</i>	Little Egret			
<i>Ardea cinerea</i>	Grey Heron			
<i>Ardea melanocephala</i>	Black-headed Heron			
<i>Bubulcus ibis</i>	Cattle Egret			
<i>Scopus umbretta</i>	Hamerkop			
<i>Dicrurus adsimilis</i>	Fork-tailed Drongo			
<i>Nilaus afer</i>	Brubru			
<i>Tchagra australis</i>	Brown-crowned Tchagra			
<i>Telophorus zeylonus</i>	Bokmakierie		N-end	
<i>Batis pririt</i>	Pirit Batis		N-end	
<i>Corvus capensis</i>	Cape Crow			
<i>Corvus albus</i>	Pied Crow			
<i>Lanius collaris</i>	Common Fiscal			
<i>Parus cinerascens</i>	Ashy Tit		End	

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status	
			Southern Africa	IUCN
<i>Riparia paludicola</i>	Brown-throated Martin			
<i>Hirundo albigularis</i>	White-throated Swallow			
<i>Hirundo dimidiata</i>	Pearl-breasted Swallow			
<i>Hirundo fuligula</i>	Rock Martin			
<i>Pycnonotus nigricans</i>	African Red-eyed Bulbul		N-end	
<i>Sylvietta rufescens</i>	Long-billed Crombec			
<i>Eremomela icteropygialis</i>	Yellow-bellied Eremomela			
<i>Eremomela gregalis</i>	Karoo Eremommela		End	
<i>Parisoma layardi</i>	Layard's Tit-Babbler		End	
<i>Parisoma subcaeruleum</i>	Chestnut-vented Tit-Babbler		N-end	
<i>Zosterops pallidus</i>	Orange River White-eye		End	
<i>Cisticola subruficapilla</i>	Grey-backed Cisticola		N-end	
<i>Cisticola juncidis</i>	Zitting Cisticola			
<i>Cisticola jaridulus</i>	Desert Cisticola			
<i>Prinia flavicans</i>	Black-chested Prinia			
<i>Mirafraba sabota</i>	Sabota Lark			
<i>Ammomanopsis grayi</i>	Gray's Lark	End		
<i>Certhilauda subcoronata</i>	Karoo Long-billed Lark		End	
<i>Eremopterix verticalis</i>	Grey-backed Sparrowlark		N-end	
<i>Calandrella cinerea</i>	Red-capped Lark			
<i>Alauda starki</i>	Stark's Lark		N-end	
<i>Bradornis infuscatus</i>	Chat Flycatcher		N-end	
<i>Melaenornis mariquensis</i>	Marico Flycatcher		N-end	
<i>Muscicapa striata</i>	Spotted Flycatcher			
<i>Cercotrichas paena</i>	Kalahari Scrub-Robin			

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status	
			Southern Africa	IUCN
<i>Namibornis herero</i>	Herero Chat	End	N-end	
<i>Oenanthe monticola</i>	Mountain Wheatear		N-end	
<i>Oenanthe pileata</i>	Capped Wheatear			
<i>Cercomela schlegelii</i>	Karoo Chat		N-end	
<i>Cercomela tractrac</i>	Tractrac Chat		N-end	
<i>Cercomela familiaris</i>	Familiar Chat			
<i>Myrmecocichla formicivora</i>	Ant-eating Chat		End	
<i>Onychognathus nabouroup</i>	Pale-winged Starling		N-end	
<i>Lamprotornis nitens</i>	Cape Glossy Starling			
<i>Creatophora cinerea</i>	Wattled Starling			
<i>Chalcomitra senegalensis</i>	Scarlet-chested Sunbird			
<i>Nectarinia fusca</i>	Dusky Sunbird		N-end	
<i>Sporopipes squamifrons</i>	Scaly-feathered Finch		N-end	
<i>Plocepasser mahali</i>	White-browed Sparrow-Weaver			
<i>Philetairus socius</i>	Sociable Weaver		End	
<i>Ploceus velatus</i>	Southern Masked-Weaver			
<i>Quelea quelea</i>	Red-billed Quelea			
<i>Amadina erythrocephala</i>	Red-headed Finch		N-end	
<i>Estrilda erythronotos</i>	Black-faced Waxbill			
<i>Estrilda astrild</i>	Common Waxbill			
<i>Passer domesticus</i>	House Sparrow			
<i>Passer motitensis</i>	Great Sparrow		N-end	
<i>Passer melanurus</i>	Cape Sparrow		N-end	
<i>Passer griseus</i>	Southern Grey-headed Sparrow			
<i>Motacilla capensis</i>	Cape Wagtail			

Species: Scientific name	Species: Common name	Namibian conservation and legal status	International Status	
			Southern Africa	IUCN
<i>Crithagra atrogulariis</i>	Black-throated Canary			
<i>Serinus flaviventris</i>	Yellow Canary		N-end	
<i>Serinus albogularis</i>	White-throated Canary		N-end	
<i>Emberiza impetuani</i>	Lark-like Bunting		N-end	
<i>Emberiza tahapisi</i>	Cinnamon-breasted Bunting			
<i>Emberiza capensis</i>	Cape Bunting		N-end	

Simmons *et al.* (2015): End – Endemic, E – Endangered, V – Vulnerable, NT – Near Threatened

Hokey *et al.* (2006): End – Endemic, N-End – Near Endemic

IUCN (2022): CE – Critically Endangered, E – Endangered, V – Vulnerable, NT – Near Threatened, All the other species are listed as LC – Least Concern or not yet been assessed for the Red List.

Source for literature review: Brown *et al.* (1998), Hokey *et al.*, (2006), IUCN (2022), Komen (n.d.), Little and Crowe (2011), Maclean (1985), Peacock (2015), Simmons *et al.* (2015), Tarboton (2001)

The most important birds known/expected to occur in the general area are all the endemics (See Table 5-15), especially Rüppell's korhaan, Gray's lark and Herero chat. Gray's lark is one of the species with the most restricted range in Namibia (Simmons 1998a). Other important species are the birds listed as endangered (Ludwig's bustard, white-backed vulture, black harrier, martial eagle, tawny eagle, booted eagle, black stork), vulnerable (Lappet-faced vulture, secretarybird) and near threatened (Rüppell's parrot, Cape eagle owl, kori bustard, Verreaux's eagle and peregrine falcon) by Simmons *et al.* (2015) and the species classified as critically endangered (white-backed vulture), endangered (Ludwig's bustard, lappet-faced vulture, black harrier), vulnerable (martial eagle, tawny eagle, secretary bird) and near threatened (kori bustard) by the IUCN (2022).

According to Cunningham (2010, 2013, 2019, 2020) between 8 (2010), 13 (2020), 17 (2013) and 18 (2019) species of birds were observed and/or confirmed (e.g., evidence thereof found) from the neighbouring INCA/TRS, Tumas, Ongolo and Kuiseb Delta areas. Furthermore, only 12 bird species were observed at Marenica (Spitzkoppe area) by Henschel *et al.* (2011).

However, the most important bird known to occur (and breed) along the coast is the Damara tern (*Sterna balaenarum*) classified as near endemic and near threatened under Namibian legislation (Simmons *et al.* 2015) and least concern (population trend decreasing with 2,200-5,700 mature individuals due to increased recreation and construction pressure on breeding grounds) by the IUCN (2022). With 98% of the Damara tern breeding population being in Namibia (Braby, 2010a; Braby, 2010b; Braby, 2011; Crawford & Simmons, 1997); very low inter-colony dispersal rates with only 70 known colonies (Braby, 2011); the importance of the general area cannot be stressed enough. Furthermore, the Caution Reef breeding colony (~13 to 120 nests since 1994) closer to Swakopmund is viewed as the third largest known breeding colony (Braby, 2011). Disturbance and urbanisation, especially off-road vehicles, impact on breeding success and consequently pose the biggest threat to Damara terns along the Namibian coast (Braby *et al.*, 2001; Braby, 2011; Braby & Braby, 2002). Although Damara tern potentially could breed on the sandy gravel gypsum plains in the general GHDP area, this has not yet been recorded and neither are these areas the quiet undisturbed habitat the birds prefer.

However, none of the bird species known and/or expected from the general area are exclusively associated with the GHDP area.

Tree and Shrub Diversity

It is estimated that at least 20-39 species of larger trees and shrubs (>1m in height) Burke (2003) [24 spp.], Coats Palgrave (1983) [20 spp.], Craven & Marais (1986) [23 spp.], Curtis & Mannheimer (2005) [39 spp.], Mannheimer & Curtis (2009) [26 spp.], Mannheimer & Curtis (2018) [14 spp.], Van Wyk & Van Wyk (1997) [20 spp.] occur in the general GHDP area. A total of 39 species is expected from the general area according to the above-mentioned authors (See Table 5-16).

A total of 39 larger trees and shrubs are known and/or expected to occur in the general area (See Table 5-16). According to Curtis & Mannheimer (2005), Mannheimer & Curtis (2009) and Mannheimer & Curtis (2018) between 14 and 39 species of larger trees and shrubs are known and/or expected to occur in the general area although not only specifically with the GHDP area, but rather associated with various habitats, mainly Kuiseb, Swakop and Tumas Rivers and rocky areas further inland.

Of the 39 species of trees and shrubs expected to occur in the area, 4 species are classified as endemic (10.3%), 1 species as near endemic (2.6%), 10 species are protected under the Forest Act No. 12 of 2001(25.6%), 3 species are protected under the Nature Conservation Ordinance No. 4 of 1975 (7.7%) while 2 species are listed as CITES Appendix 2 (5.1%) species. *Arthroaeruleubnitziæ* is endemic to the fog zone in the central Namib region (Burke, 2003).

The most important species expected to occur in the general area are *Acanthosicyoshorridus* (protected F; near endemic) which could be considered one of Namibia's most characteristic plants (Seely 2010) and remains an important commodity to the local Topnaar people (Burke 2003); *Capparis hereroensis* (endemic) and *Welwitschia mirabilis* (protected F & NC; C2). However, *A. horridus* and *C. hereroensis* are mainly associated with sandy areas (e.g. dune belt and Kuiseb River) and not the gravel plains in the proposed GHDP area while *W. mirabilis* is found further inland. Furthermore, none of the important larger tree and shrub species is exclusively associated with the GHDP area.

Table 5-16 indicates the tree and shrub diversity known and/or expected to occur in the general area and are derived from Mannheimer & Curtis (2018). Species are known from the quarter-degree square distribution principle used and don't necessarily occur throughout the entire area. Trees and larger shrubs likely to occur in the general area indicated by Burke (2003) (trees, shrubs and stem succulents) and Craven & Marais (1986), are also included. Species confirmed during the fieldwork are also included. Some species indicated to possibly occur in the area according to Coats Palgrave (1983) and Van Wyk & Van Wyk (1997) is excluded here.

Table 5-16: Tree and Shrub Diversity Expected (Literature Study) and Confirmed (√ - fieldwork) in the Proposed GHDP Area

Species: Scientific name	Species confirmed: Gravel plain area	Expected: Mannheimer and Curtis (2018)	Expected: Burke (2003)	Expected: Craven and Marais (1986)	Namibian conservation and legal status
<i>Acacia erioloba</i>		√	√	√	Protected (F)
<i>Acacia reficiens</i>				√	
<i>Acanthosicyos horridus</i>		√	√	√	Protected (F); N-end
<i>Adenolobus garipensis</i>			√		
<i>Adenolobus pechuelii</i>		√	√	√	
<i>Aloe asperifolia</i>				√	NC
<i>Aptosimum spinescens</i>			√		
<i>Arthroa leubnitziae</i>	√		√	√	End
<i>Asclepias buchenaviana</i>				√	
<i>Barleria lancifolia</i>			√		
<i>Boscia foetida</i>			√		
<i>Calicorema capitata</i>			√		
<i>Capparis hereroensis</i>		√			End
<i>Commiphora glaucescens</i>			√		
<i>Commiphora saxicola</i>			√	√	End; Protected (F)
<i>Cyphostemma currorii</i>			√		Protected (F)
<i>Dyerophytum africanum</i>			√		
<i>Euclea pseudebenus</i>			√	√	Protected (F)
<i>Euphorbia virosa</i>			√		C2
<i>Faidherbia albida</i>		√		√	Protected (F)
<i>Gossypium anomalum</i>		√			
<i>Hoodia currorii</i>			√	√	NC
<i>Ipomoea adenioides</i>				√	
<i>Lycium cinereum</i>		√		√	

<i>Lycium hirsutum</i>		√			
<i>Lycium tetrandrum</i>		√			
<i>Maerua schinzii</i>			√		Protected (F)
<i>Monechma cleomoides</i>			√		
<i>Moringa ovalifolia</i>			√		Protected (F)
<i>Parkinsonia africana</i>				√	
<i>Pechuel-Loeschea leubnitziae</i>		√		√	
<i>Petalidium setosum</i>			√	√	
<i>Salsola</i> spp.	√Δ	√	√	√	
<i>Salvadora persica</i>		√	√	√	
<i>Sarcocaulon marlothii</i>				√	
<i>Tamarix usneoides</i>		√	√	√	Protected (F)
<i>Tetragonia reduplicata</i>				√	
<i>Welwitschia mirabilis</i>			√	√	Protected (F); NC; C2
<i>Zygophyllum stapffii</i>	√	√		√	End

End; N-end = Endemic and Near-endemic (Craven, 1999; Mannheimer & Curtis, 2018)

Protected (F) = Forest Act No. 12 of 2001

NC = Nature Conservation Ordinance No. 4 of 1975

C2 = CITES Appendix 2 species

Δ = Dominant species

Loots (2005) lists at least 4 species of conservation concern – i.e. Red Data species – from the general Swakopmund/Walvis Bay (inland) area of which 3 species are endemic, 1 species viewed as near threatened (*Adenia pechuelii*), 3 species protected by the Nature Conservation Ordinance No. 4 of 1975, 1 species listed by CITES as Appendix 2 species and 3 species viewed as least concern (Table 5-17).

Table 5-17: Important Species – i.e., Red Data spp. – Known to Occur in the General Swakopmund/Walvis Bay (inland) Area according to Loots (2005)

Species: Scientific name	Conservation status
<i>Adenia pechuelii</i>	End, NT
<i>Aloe namibensis</i>	End, NC, C2, LC
<i>Lithops gracilidelineata</i> subsp. <i>gracilidelineata</i>	NC, LC
<i>Lithops ruschiorum</i>	End, NC, LC

End = Endemic (Loots, 2005)

NT = Near Threatened; **LC** – Least Concern (Loots, 2005)

NC = Nature Conservation Ordinance No. 4 of 1975

C2 = CITES Appendix 2 species

During the rapid site assessment only 3 species of larger trees/shrubs were observed in the GHDP area with *Salsola nollothensis* (saltbush) being the most numerous, especially along one of the southernmost (and least significant) channels of the ephemeral Tumas River drainage lines (Figure 5-2). The two endemic species (*Arthraerualeubnitziae* [pencil bush], *Zygophyllumstapffii* [dollar bush]) occurred at low densities interspersed with *S. nollothensis* shrubs throughout the area and more numerous the further one moves eastwards (i.e. inland), especially along the above mentioned ephemeral drainage line and inland granite ridges (Figure 5-3 and Figure 5-4).



Figure 5-2: *Salsola Nollothensis* (Saltbush) Shrubs are the Most Numerous Plants in the GHDP Area



Figure 5-3: The Endemic *Arthroa Leubnitziae* (Pencil Bush) Occurs in the GHDP Area although at Low Densities



Figure 5-4: The Endemic *Zygophyllum Stapffii* (Dollar Bush) Occurs in the GHDP Albeit as Individual Plants Only

All three species occur widespread along the central Namibian coastal area and are not exclusively associated with the GHDP area. The GHDP area is sparsely vegetated with individual *A. leubnitziae* and *S. nollothensis* shrubs scattered throughout the otherwise sandy gravel gypsum plain area. Hummock forming is often associated with these species which result in unique habitat to a variety of

vertebrate fauna, increasing their value from an ecological point. The initial stages of such hummocks can be viewed further eastwards along the ephemeral drainage line (Figure 5-5).



Figure 5-5: *Salsola Nollothensis* (Saltbush) Hummocks forming along the Ephemeral Drainage Line

Grass Diversity

It is estimated that up to 48 grasses – 6 to 37 species – (Burke 2003 [6 spp.], Curtis & Marais (1986) [5 spp.], Müller (2007) [21 spp.], Müller (1984) [24 spp.], Van Oudtshoorn (1999) [37 spp.]) occur in the general GHDP area.

Southern Namib

Desert grasses are dominated by the genus *Stipagrostis* (Lovegrove, 1999). *Stipagrostissabulicola* (tough dune grass) occurs on the dunes while the inter-dune flats (streets) are covered with *Stipagrostisgonatostachys* after rains. The eastern inland sections – pro-Namib – are dominated by *Stipagrostisobtusa* and *S. ciliata* after rains (Giess, 1971; Lovegrove, 1999). Possibly the most common and well adapted grass in the Walvis Bay area is the hardy salt loving *Odyseepaucinervis* (Müller, 1984; Van Oudtshoorn, 1999).

Table 5-18 indicates the grasses known and/or expected to occur in the general area and are derived from ¹Müller (1984), ²Van Oudtshoorn (1999), ³Burke (2003), ⁴Curtis & Marais (1986) and ⁵Müller (2007).

Table 5-18: Grass Diversity Expected (Literature Study) and Confirmed (√ - fieldwork) to Occur in the General GHDP Area

Species: Scientific name	Species confirmed: Gravel plain area	Namibian conservation and legal status	Ecological Status	Grazing Value
^{2,5} <i>Anthephora pubescens</i>			Decreaser	High
² <i>Aristida adscensionis</i>			Increaser 2	Low
² <i>Aristida congesta</i>			Increaser 2	Low
^{2,5} <i>Bachiaria deflexa</i>			Increaser 2	Average
^{2,3} <i>Cenchrus ciliaris</i>			Decreaser	High
^{1,2,3} <i>Centropodia glauca</i>			Decreaser	High
^{1,2} <i>Chloris virgata</i>			Increaser 2	Average
^{2,4} <i>Cladoraphis spinosa</i>			Increaser 1	Average
^{1,2,5} <i>Cynodon dactylon</i>			Increaser 2	High
^{1,2} <i>Dactyloctenium aegyptium</i>			Increaser 2	Average
^{1,2} <i>Enneapogon cenchroides</i>			Increaser 2	Low
^{1,2,3} <i>Enneapogon desvauxii</i>			Intermediate	Average
^{1,2} <i>Enneapogon scaber</i>			?	Low
² <i>Enneapogon scoparius</i>			Increaser 2	Low
^{1,5} <i>Entoplocamia aristulata</i>			Intermediate	Low
^{1,5} <i>Eragrostis annulata</i>			Increaser 2	Low
² <i>Eragrostis cilianensis</i>			Increaser 2	Low
^{1,2,5} <i>Eragrostis echinochloidea</i>			Increaser 2	Average
² <i>Eragrostis lehmanniana</i>			Increaser 2	Average
^{2,3,5} <i>Eragrostis nindensis</i>			Increaser 2	Average
¹ <i>Eragrostis omahekensis</i>		End	?	Low
^{1,5} <i>Eragrostis porosa</i>			Intermediate	Low
² <i>Eragrostis rotifer</i>			Intermediate	Low
^{2,5} <i>Eragrostis superba</i>			Increaser 2	Average
^{2,5} <i>Fingerhuthia africana</i>			Decreaser	Average
² <i>Melinis repens</i>			Increaser 2	Low
^{1,4,5} <i>Odyssea paucinervis</i>			?	Low
^{2,5} <i>Panicum repens</i>			Decreaser	High
^{2,4} <i>Phragmites australis</i>			Decreaser	Low

Species: Scientific name	Species confirmed: Gravel plain area	Namibian conservation and legal status	Ecological Status	Grazing Value
^{1,5} <i>Pogonarthria fleckii</i>			Increaser 2	Low
² <i>Polypogon monspeliensis</i>			?	Average
² <i>Schmidtia kalahariensis</i>			Increaser 2	Low
^{1,2} <i>Schmidtia pappophoroides</i>			Decreaser	High
¹ <i>Setaria appendiculata</i>			Decreaser	High
² <i>Setaria megaphylla</i>			Decreaser	High
^{1,2} <i>Setaria verticillata</i>			Increaser 2	Average
⁴ <i>Sporobolus consimilis</i>			?	Low
² <i>Sporobolus festivus</i>			Increaser 2	Low
⁴ <i>Sporobolus nebulosus</i>			Increaser 2	Low
^{1,2,3,5} <i>Stipagrostis ciliata</i>			Decreaser	High
^{1,2,5} <i>Stipagrostis hirtigluma</i>			Increaser 2	Low
^{1,5} <i>Stipagrostis hochstetteriana</i>			Decreaser	Average
^{1,2,5} <i>Stipagrostis namaquensis</i>			?	Average
³ <i>Stipagrostis sabulicola</i>		End*	?	?
^{1,2,5} <i>Stipagrostis obtusa</i>			Decreaser	High
^{1,2,5} <i>Stipagrostis uniplumis</i>			Increaser 2	Average
^{1,2,5} <i>Tricholaena monachne</i>			Increaser 2	Average
^{2,5} <i>Tragus berteronianus</i>			Increaser 2	Low

End = Endemic (Muller, 1984; Muller, 2007; *Burke, 2003)

? = Undetermined in literature

Δ = Dominant species

Between 21 and 24 species of grass potentially could occur in the general area (Müller, 1984; Müller, 2007). According to Müller (1984) the endemic grass *Eragrostisomahekensis* potentially occurs in the general area although the updated Müller (2007) excludes this species suggesting that it probably does not occur in the area. Burke (2003) describes *Stipagrostissabulicolia* as a “true Namib endemic” which only occurs in the dune fields of the Namib Desert. The annual *Stipagrostishermanii* occurs on the gravel and sandy/gravel plains, while *S. sabulicolia* is common on hummocks along in the Kuiseb River Delta area as well as some parts of the dune belt area. Patches of *Phragmites australis* also occurs in the area, but usually associated with surface water – e.g., leakages along the various pipelines and closer to the coastal areas (including the Walvis Bay sewerage works) (Cunningham, 2020).

Grasses are not well represented throughout the dune belt and gravel plain areas although *Stipagrostissabulicolia* and *Cladoraphis spinosa* form dense stands in some parts of the Kuiseb River Delta area (Cunningham, 2020). According to Burke (2003) the endemic *Stipagrostissabulicolia* is strictly confined to mobile dunes and as it is often the only perennial species present, it provides habitat for a variety of species, especially insects. The preferred habitat of *Cladoraphis spinosa* is dunes and riverbeds in the Namib (Burke, 2003).

The most important species expected to occur in the area are *Eragrostisomahekensis* and *Stipagrostissabulicolia*. However, none of the important grass species is exclusively associated with the GHDP area.

During the fieldwork, no grasses were observed from the GHDP area (Figure 5-6).



Figure 5-6: The Barren Sandy Gravel Gypsum Plain Area is Devoid of Vegetation including Grasses

Other Species Diversity

Aloe spp.

All the aloes are protected in Namibia (See Nature Conservation Ordinance No. 4 of 1975). Other than *Aloe asperifolia* listed in Table 5-16, *Aloe namibensis* and *A. hereroensis* probably also occur in

the general area (Rothmann, 2004). *Aloe namibensis* are known to occur in the general area (Pers. obs.).

Commiphora spp.

Many endemic *Commiphora* species are found throughout Namibia (Steyn, 2003) with other *Commiphora* species known/expected to occur in the general area include *Commiphora glandulosa*, *C. namaensis* and *C. wildii*. Furthermore, some species are also known to have an economic potential – i.e., resin properties of *C. wildii* used in the perfume industry (Nott & Curtis, 2006) – which makes them an important group of plants.

Euphorbia spp.

At least 47 *Euphorbia* spp. occur throughout Namibia of which 4 species are listed as rare, 1 endangered, 1 vulnerable and 1 near threatened (Moller & Becker, 2019). *Euphorbia* species known/expected to occur in the general area include at least 8 species (*Euphorbia avasmontana*, *E. gariepina*, *E. giessii*, *E. guerichiana*, *E. lignosa*, *E. mauritanica*, *E. monteiroi*, *E. virosa*).

Ferns

At least 64 species of ferns, of which 13 species being endemic, occur throughout Namibia. Ferns in the general area include at least 2 endemic species (*Cheilanthes nielsii*, *Isoetes giessii*.) and 9 indigenous species (*Actiniopteris radiata*, *Asplenium cordatum*, *Cheilanthes dinteri*, *C. inaequalis*, *C. marlothii*, *C. parviloba*, *Isoetes aequinoctialis*, *Ophioglossum polyphyllum*, *Pellaea calomelanos*) (Crouch, et al., 2011). Although the area is marginal habitat for ferns the general area is undercollected with more species probably occurring than presented above.

Lichen spp.

The overall diversity of lichens is poorly known from Namibia, especially the coastal areas and statistics on endemism is even sparser (Craven, 1998). To indicate how poorly known lichens are from Namibia, the recent publication by (Schultz & Rambold, 2007) indicating that 37 of the 39 lichen species collected during BIOTO surveys in the early/mid 2000's was new to science (i.e., new species), is a case in point. More than 120 species are expected to occur in the Namib Desert with the majority being uniquely related to the coastal fog belt (Wirth, 2010). Lichen diversity is related to air humidity and generally decreases inland from the Namibian coast (Schultz & Rambold, 2007). Many lichens look similar are highly variable in appearance and notoriously difficult to identify unless with the use of a microscope (e.g., crustose lichens) or certain chemical tests. Off road driving is the biggest threat to these lichens which are often rare and unique to Namibia. Lichens are important as the endemic Damara tern often uses these fields as a breeding ground (Craven & Marais, 1986) and may even reveal life-saving antibiotics in future (Seely, 2010).

Lichen diversity and abundance decreases from the sandy/gravel plains just south of the Swakop River to the sandy/gypsum plains north of the Kuiseb River east of the dune belt. The closest lichen hotspots include a Crustose lichen zone east of the dune belt area, just south of the Swakop River, while extensive patches of fruticose and foliose lichens occur in the Mile 8 and Wlotzkasbaken areas between Swakopmund and Henties Bay – i.e., far to the north of the proposed GHDP area.

During the fieldwork, only one species of lichen was observed from the GHDP area (Figure 5-7).



Figure 5-7: An Unidentified Lichen Species (probably *Caloplaca spp.*) Observed in the GHDP Area

Lithop spp.

Lithop species – all protected – are also known to occur in the general area and often difficult to observed, especially during the dry season when their aboveground structures wither. *Lithops ruschiorum* var. *ruschiorum* is known to occur in the general area (Cole & Cole, 2005; Earle & Round, n.d.)

Other

Other species with commercial potential that could occur in the general area include *Citrullus lanatus* (Tsamma melon) which potentially has a huge economic benefit (Mendelsohn *et al.*, 2002).

Often deserts and plants associated with this marginal area look “dead” although are not, and thus not viewed as important. All desert vegetation serves as a source of habitat and/or food for desert dwelling fauna – e.g., arthropods and reptiles. Although the focus during this literature survey was on the more visible trees, shrubs, grasses, and more important other species potentially occurring in the general GHDP area, many more species (e.g., herbs) occur throughout the area and are viewed as important.

Important Species

Reptiles

The endemic *Pedioplanishusabensis* (Husab Sand Lizard), which is a restricted range species (100% of the taxon’s range within Namibia) potentially, occurs in suitable habitat – e.g., “light coloured” geology (marble/granite ridges) – throughout the general area although probably not in the GHDP area. Other reptile species of concern and expected to occur in the general area are the endemic *Afroeduraafricanaafricana* (African flat gecko), *Leptotyphlops occidentalis* (western thread snake) and *Lycophidionnamibianum* (Namibian wolf snake).

Sedentary species – e.g., most species including all geckos – will be adversely affected by the proposed GHDP developments, however none of the reptiles expected to occur in the general area are exclusively associated with the proposed GHDP area.

Amphibians

Amphibians are not viewed as important throughout the GHDP area although the ephemeral Tumas River may occasionally serve as temporary habitat. The endemic *Poyntonophrynus hoeschi* and *Phrynomantis annectens* are viewed as the most important although they are not exclusively associated with the proposed GHDP area.

Mammals

The most important species from the general area are the Namibian wing-gland bat (*Cistugo seabrai*) listed as endemic and rare; Littledale's whistling rat (*Protomys littledalei namibensis*) – of which the subspecies “*namibensis*” is known to occur in the ephemeral river courses in the “Swakopmund area” (Griffin, 2003) – listed as endemic; brown hyena (*Parahyaena brunnea*) and leopard (*Parthera pardus*) listed as near threatened and vulnerable (population trends decreasing), respectively by the (IUCN, 2022). However, leopard is only expected to occasionally pass through the area as the general area is not viewed as favoured habitat.

Other important species expected to occur in the general area include the African wild cat (*Felis sylvestris*), suffering genetic pollution with domestic cats throughout its range and the endemic Hartmann's mountainzebra (*Equus zebra hartmannae*), classified as “Vulnerable” by the IUCN (2022). However, the Hartmann's mountainzebra favour the better vegetated inland areas and may only pass-through during foraging and do not necessarily occur in the area permanently.

Sedentary species – e.g., rodents – will be adversely affected by the proposed GHDP developments and species not being able to negotiate above ground pipeline infrastructures (e.g., oryx, Hartmann's mountain zebra); however none are exclusively associated with the proposed development area.

Birds

The most important birds known/expected to occur in the general area are all the endemics especially Rüppels korhaan, Gray's lark and Herero chat. Gray's lark is one of the species with the most restricted range in Namibia (Simmons, 1998a). Other important species are the birds listed as endangered (Ludwig's bustard, white-backed vulture, black harrier, martial eagle, tawny eagle, booted eagle, black stork), vulnerable (Lappet-faced vulture, secretarybird) and near threatened (Rüppell's parrot, Cape eagle owl, kori bustard, Verreaux's eagle and peregrine falcon) by (Simmons, et al., 2015) and the species classified as critically endangered (white-backed vulture), endangered (Ludwig's bustard, lappet-faced vulture, martial eagle, black harrier, secretarybird), vulnerable (tawny eagle) and near threatened (kori bustard) by the (IUCN, 2022).

Bird species most likely to be adversely affected by the proposed GHDP developments are the ground nesting species associated with gravel plains such as the endemic Gray's lark and Rüppell's korhaan as well as larger raptors, especially the disturbance at breeding sites (i.e. lappet-faced vulture nesting sites mainly isolated with bigger *Acacia erioloba* trees) and species not being able to negotiate above ground pipeline infrastructures (e.g., ostrich); however none are exclusively associated with the proposed development area.

Trees/Shrubs

Acanthosicyos horridus (!Nara) can be considered one of the most characteristic plants in the Namib Desert (Seely, 2010). It viewed as the most important plant species in the Kuiseb River Delta area, not only because of its social and financial value to the Topnaar community, but as it is viewed as a keystone species in the area – i.e., plays a unique and crucial role in the way the ecosystem functions. The plant is eaten by ostrich (and donkeys) and the fruit by various small rodents (gerbils), black backed jackal, oryx, black rhino and various invertebrates (Burke, 2003), (Mannheimer & Curtis, 2018), (Seely, 2010). It is also viewed as of “vital existence for several desert animals” (Mannheimer *et al.*

2008). Detritus (dead organic matter) associated with this plant also attracts a variety of insects (Burke, 2003) while various reptiles are also associated with this plant for shelter and invertebrates attracted to it – e.g. the mainly herbivorous *Angolosaurus skoogi* (desert plated lizard) in the northern Namib (Seely, 2010). Other important species include *Capparis hereroensis* and *Welwitschia mirabilis* although *A. horridus* and *C. hereroensis* are mainly associated with sandy areas (e.g., dune belt and Kuiseb River) and not the gravel plains in the proposed GHDP area while *W. mirabilis* is found further inland.

Species listed by (Loots, 2005) as of conservation concern – i.e., Red Data species – from the general Swakopmund/Walvis Bay (inland) area, are also viewed as important.

Furthermore, Southern Africa is an important centre of diversity for the melon family (*Cucurbitaceae*) and they have an excellent potential for development to supplement or replace cereal production in arid regions (Kolberg, 1998).

Grasses

The most important species expected to occur in the area are *Eragrostis omahekensis* and *Stipagrostis sabulicola*.

Other species

Various *Aloe*, *Euphorbia*, fern, lichens, *Lithop* species associated with the gravel plain habitat are viewed as important, especially the large lichen diversity known from certain 'lichen field' sites.

Important areas

The GHDP area does not have any major unique habitats; is not in a pristine condition and is heavily impacted by various anthropomorphic activities. However, the following areas are viewed as the most unique (sensitive) throughout the general area although only the Inland Gravel Plains are directly relevant to the proposed GHDP area:

Inland Gravel Plains [biodiversity yellow flag area]

The gravel plains east of the mobile dune belt are classified as a 'biodiversity yellow flag' area (SAIEA, 2010). The 'red' and 'yellow' flag areas have been proposed on the basis of the following guiding principles:

- areas with high levels of endemism and diversity;
- conservation status of species;
- the extent to which habitats are threatened or vulnerable to disturbance; and
- habitats or migration routes which are critical for species' survival (SAIEA, 2010).

According to SAIEA (2010) the lichens, invertebrates and biodiversity associated with the Tumas River drainage area and Tumas River 'mouth' (reedbed and ephemeral spring on eastern edge of dunes) – hummocks and ephemeral wetland are viewed as important. Curtis & Barnard (1998) list the Namib gravel plains (coastal fog belt) as a site of special ecological importance with its known distinctive values including its biotic richness and endemism (e.g., lichens, arachnids and insects) and habitat threatened by off-road driving. Dolerite ridges are also viewed as important habitat, rich in lichens and other plant diversity – e.g., *Aloe namibensis*, *Euphorbia lignosa*, etc. (SAIEA, 2010), albeit not as numerous and/or well vegetated south of the Swakop River as in the general Wlotskasbaken area (Figure 5-13 and Figure 5-14).

However, this area is not pristine anymore and heavily impacted by various anthropomorphic activities (past and present) which include road construction activities, existing pipeline and transmission line infrastructures; litter dumping; various tracks; off road driving; etc. (Figure 5-8 to Figure 5-10).



Figure 5-8: Off Road Driving and Old Tracks Remain Visible for Years in the Sandy Gravel Gypsum Plain Areas



Figure 5-9: Various Past and Present Construction Activities have Degraded the General Area



Figure 5-10: Litter is Scattered throughout the Area

An eroded granite riverbank, which forms part of the of the ephemeral Tumas River drainage lines, on the eastern side of the GHDP area is viewed as the most important habitat in the general GHDP area. It serves as habitat to a variety of vertebrate fauna – e.g., near threatened brown hyena (*Parahyaena (Hyaena) brunnea*) resting site (Figure 5-11) and the diurnal and endemic Namib day gecko (*Phelsuma [Rhoptropus] afer*). Although this habitat is not exclusively associated with the GHDP area, nor particularly unique, it nevertheless is viewed as the most important habitat in the general proposed GHDP area (Figure 5-12).

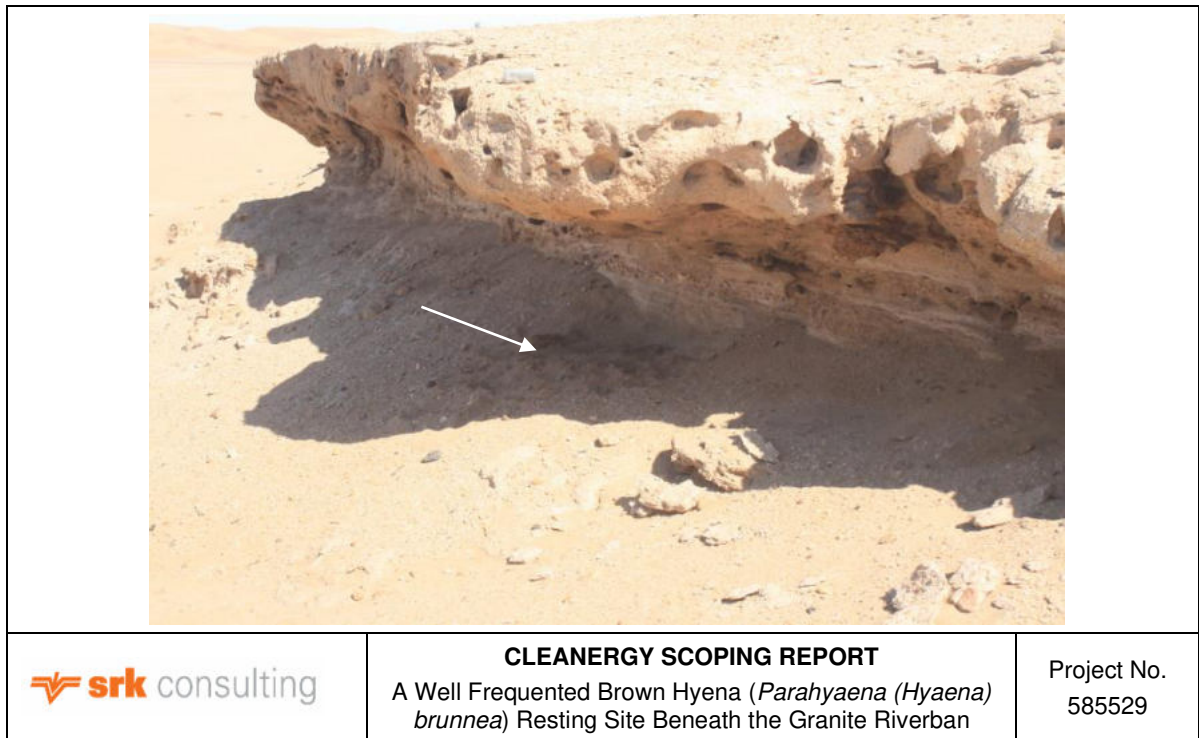


Figure 5-11: A Well Frequented Brown Hyena (*Parahyaena (Hyaena) brunnea*) Resting Site Beneath the Granite Riverbank



Figure 5-12: The Eroded Granite Riverbank System Viewed as the Most Important Habitat in the General GHDP Area

A well vegetated hummock system in one of the ephemeral Tumas River drainage lines further to the north of the GHDP area. Such a well-developed hummock system is viewed as unique and can be compared to the sparsely vegetated drainage line in the GHDP area (Figure 5-13).



Figure 5-13: A Well Vegetated Hummock System in One of the Ephemeral Tumas River Drainage Lines further to the North of the GHDP Area. Such a Well-Developed Hummock System is Viewed as Unique and can be Compared to the Sparsely Vegetated Drainage Line in the GHDP area.



Figure 5-14: An Example of a Dolerite Ridge, Further to the North of the GHDP Area, Viewed as a Unique Habitat to a Variety of Flora and Vertebrate Fauna

Other important non-marine areas in the immediate vicinity:

Coast immediately north of Walvis Bay [biodiversity red flag area]

This coastal area is 90km² in size and viewed as an Important Bird Area (IBA) with a high density of waders along the beach including a known Damara tern breeding area (SAIEA, 2010). Furthermore, the entire coastline is viewed as a site of special ecological importance in Namibia with distinctive values such as its biotic richness especially for arachnids, birds, and lichens (Curtis & Barnard, 1998).

Swakop River [biodiversity red flag area]

The Swakop River is an important habitat due to the linear oasis, riparian woodland, aquifer recharge, rich wildlife, and bird flypaths associated with this ephemeral drainage line (SAIEA, 2010).

Kuiseb River Delta [biodiversity red flag area]

The Kuiseb River has a catchment area of 15,500km² and a total length of 420km with the common riparian vegetation including species such as *Acacia erioloba*, *Acanthosicyoshorridus*, *Eucleapseudebenus*, *Faidherbia albida*, *Ficus* spp., *Salvadora persica* and *Tamarix usneoides* (Jacobsen *et al.*, 1995). Ephemeral rivers are viewed as sites of special ecological importance mainly for its biotic richness; large desert-dwelling mammals; high value for human subsistence and tourism (Curtis & Barnard, 1998) while the lower catchment of the Kuiseb River passes through a unique arid environment divided by this linear oasis and has great conservation and tourism significance to Namibia (Jacobsen *et al.*, 1995). Such vegetated rivers in an otherwise extreme arid environment are unique habitat and a virtual lifeline to many desert-dwelling fauna. The Kuiseb River Delta is viewed as an area with high biodiversity value (i.e., very high density of !Nara plants and important for Topnaar livelihoods) and listed as a 'biodiversity red flag' area (SAIEA, 2010).

!Nara Fields [biodiversity red flag area]

The *Acanthosicyoshorridus* (!Nara) fields in the Kuiseb River Delta area fall within the 'biodiversity red flag' area (and the *raison d'être* for the listing) (SAIEA 2010). The endemic and protected *Acanthosicyoshorridus* (!Nara) is important as a commodity for the Topnaars living along the Kuiseb River. Furthermore, it serves as refuge and a source of food for various desert dwelling fauna. According to Jacobsen *et al.* (1995) the over extraction of groundwater from alluvial aquifers has lowered the water table and caused the death of natural vegetation such as *Faidherbia albida* (anna tree) and the loss of production of *Acanthosicyoshorridus* (!Nara) in the lower Kuiseb River. Although the roots are 30-40m long to access water deep underground (Mannheimer *et al.*, 2008) – i.e., roots are always in contact with water (Seely 2010) – the lowering of the water table may have disastrous effects on this species and all those species reliant on it for their survival (including the Topnaar community).

5.3 Heritage and Cultural Aspects

This Section has been extracted from RCHS, 2022.

Namibia has a very diverse culture. Cultures commonly found in Namibia include the Afrikaners, German communities, African communities, and Creole communities. The Rehobothers closely resembles the mid-20th century rural Afrikaner culture, while the Nama has more in common with African communities. The northern African cultures formed from a mixed farming context unlike the Damara and Herero. The San's culture was ruined by wartime exploitation and ranch labourers (Britannica, 2022).

The proposed GHDP site is an area between Walvis Bay and Swakopmund in proximity to D1984 road network. It is a designated light/heavy industrial area that has been also subject to intensive

recreational pressure associated with the Dune 7. Other activities in the area, such as quad-biking, off-road driving and sightseeing appear to be operating. However, these are not regulated. The topography of the proposed GHDP site is relatively flat and on level ground with an altitude of 50m above sea level. Its whether is largely influenced by arid coastal conditions that are maintained by the cold Benguela Current that flows northwards from the South Atlantic Ocean, driven by strong south-westerly winds. Its geology is characterised by two distinct geomorphological units. The largest by far being the gravel coastal plain and a dry disappeared riverbeds with lateral erosion of previous floods barely visible (Figure 5-15). During the site visit, no animals were observed in the area, but multiple fresh footprints belonging to carnivores- hyena or jackal (not confirmed) were visible on the ground (Figure 5-16) and these differs in size and morphological appearance. One plant species was registered in the project - isolated patches of *Arthraerua leubnitziae* hummocks (Figure 5-17).



Figure 5-15: Animal Tracks Registered within the GHDP (RCHS, 2022)



Figure 5-16: The Endemic *Arthroerua Leubnitziae* Recorded in the Footprint of the Project (RCHS, 2022)

5.3.1 Fieldwork

Sites visit and a detailed field investigation was carried out from the 16 to 18 August 2022 by the cultural heritage team. The walkover survey (Figure 5-19) covered an entire combined area of 26 hectares of the proposed sites. In total, this area stretches from the new road D1984 extension which lies just before the western margin of the High Dune Belt overlooking Dune 7 fields (Figure 5-17A) to the eastern small escarpment formed by the lateral erosion of the flood deposits (Figure 5-17B). A systematic visual inspection was undertaken, and photographs taken to record ground conditions and any surface archaeological/cultural heritage sites encountered. The locations of surface features were included in the survey and objects were recorded using a handheld Garmin GPS with an accuracy of +/-2 m horizontally and elevation. The site beacon (Figure 5-18) has been marked for the project.

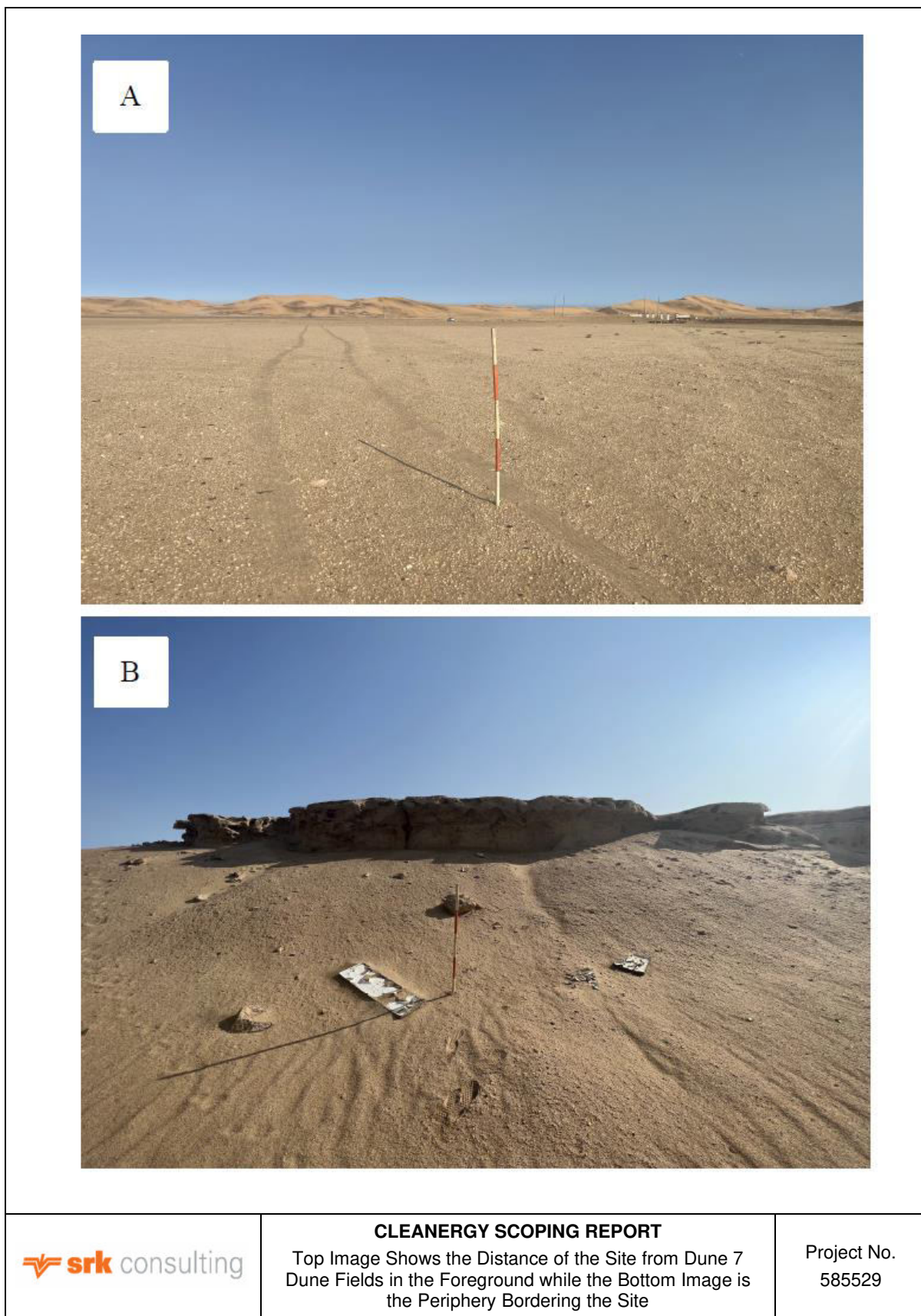


Figure 5-17: Top Image Shows the Distance of the Site from Dune 7 Dune Fields in the Foreground while the Bottom Image is the Periphery Bordering the site (RCHS, 2022)

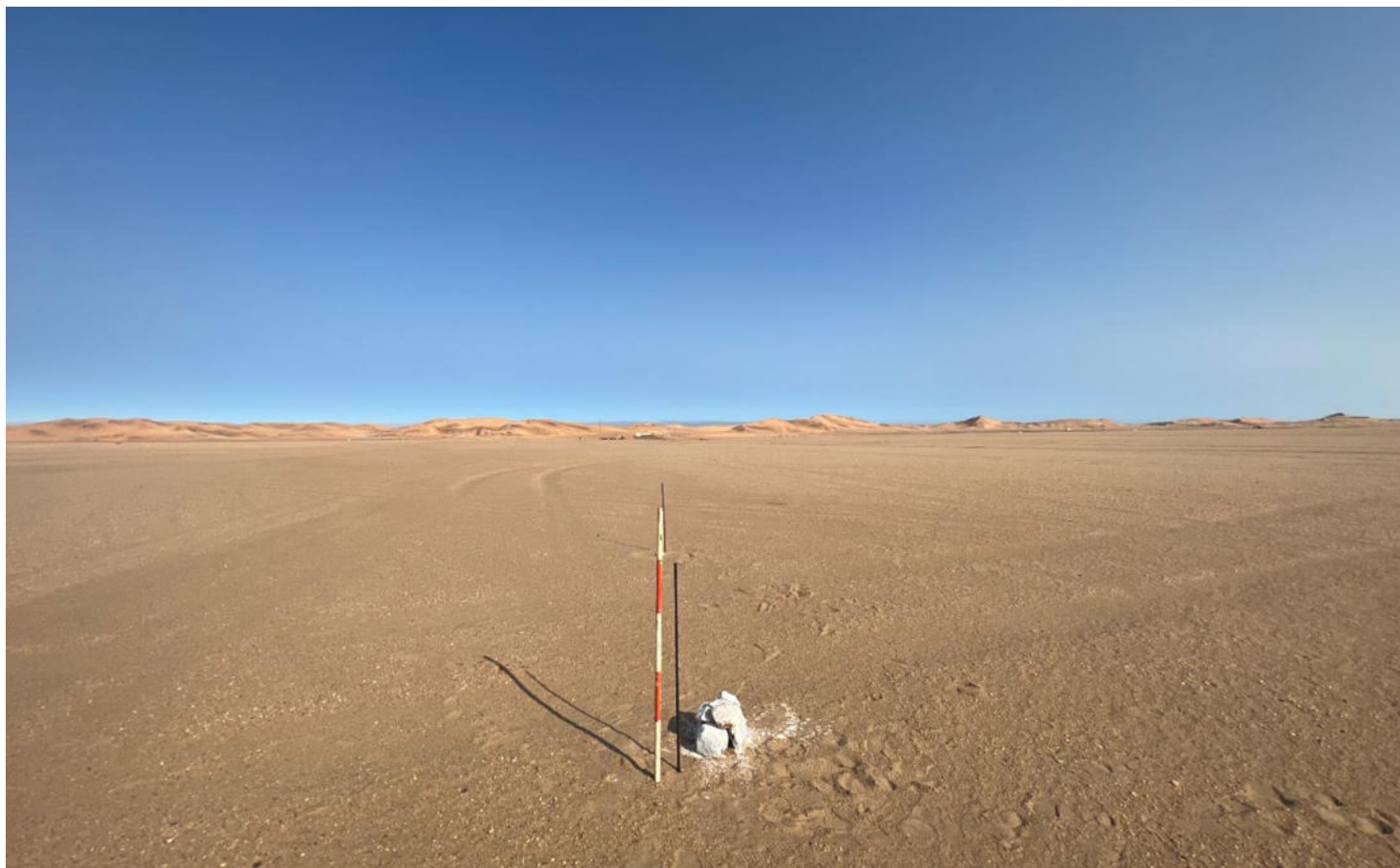


Figure 5-18: Site Beacon (White Stones) Scaled at Local Level (RCHS, 2022)



Figure 5-19: Walkover Survey within the Proposed GHDP Site (RCHS, 2022)

5.3.2 Literature Review

Available heritage literature indicates that the area covering the GHDP Project falls under the Namib Naukluft Park in Erongo Region (Figure 5-20). It was proclaimed in August 1979 under the Nature Conservation Ordinance No 4 of 1975.

According to several researchers, the Erongo Region, including the central Namib Desert is recognized as a major archaeological landscape in Namibia (see Wendt, 1972; Kinahan, 1990, 1984, 2020, 2012, 2021; Richter, 1991, Lenssen-Erz, 1997, 2004; Breunig 2003; Pleurdeau *et al.*, 2012; Nankela, 2013, 2017, 2020 etc.) also (Figure 5-21). However, a considerable and large part of the region remains archaeologically unregistered because research has concentrated mostly on key major granite landforms which helped to establish the sequence of human occupations and determined the relationship between archaeological sites and the particular types of terrain across the landscape. It is for this reason that the region's archaeological wealth is evidenced in a substantial number of prehistoric human settlements dating from the Early through Middle to Late Stone Age periods (Kinahan, 2012). The earliest evidence of human activity is traced back from 800 000 years Before Present (BP) according to Kinahan (2011). Multiple sources further attest that abundance of significant archaeological sites have been recorded within the last 12 000 to 10 000 years, during Holocene period which coincides with the onset of warmer and moist conditions after the retreat of the Last Ice Age period which led to sudden expansion of human occupation as aridity intensified in the entire Namib Desert and hinterland (Stuut *et al.*, 2000; Kinahan, 1991, 2012, 2021; Pleurdeau *et al.*, 2012; Nankela, 2007; Lenssen-Erz, 2007). Such changes eventually prompted the Hunter-Gatherers to find refuge in mountainous localities such as the Brandberg, Erongo and Spitzkoppe Mountains where food and shelter was available. Chronologically, records yielded from a series of excavations carried out in these areas roughly over the last 6000 BP to 50 years BP when the rock art tradition was likely abandoned. These archaeological data are attributed to the Hunter-Gatherers and later pastoralists communities.

The coastal region is another crucial archaeological landscape in Erongo. The rich oceanic and coastal biodiversity and its resources has afforded a favorable living environment for the indigenous pastoralists' community as evidenced by Pre-Holocene records including detailed historical records from the last 250 years (Avery, 1984; Kinahan, 1991, 2000, 2001, 2005; Kinahan & Kinahan 2009; Morse *et al.*, 2013; Bennett *et al.*, 2014; Detroit & Nankela, 2014; Nankela, 2017). These are harvested through a series of detailed archaeological research and surveys assessments. Walvis Bay, a natural harbour, and the largest anchorage on the coast that stretches about 500 km to the north is the first site of contacts between the indigenous communities and Europeans during the late seventeenth century (Kinahan & Kinahan, 2009). To date, Walvis Bay, and its surrounding environment i.e., Kuiseb Delta and Dune Belt Areas also Kuiseb Delta Conservation Areas (KDCA) has registered approximately 235 archaeological sites of which 75% dates from prehistoric period linked to the indigenous communities such as the Topnaar (Aonin). They were purportedly wealthy pastoralist that controlled extensive grazing lands around in the interior of the country and exploited the coastal resources (Kinahan, 2001; Kinahan & Kinahan, 2009). Such sites are generally characterized by shell middens of various extensions, accumulations of skeletal remains of marine and terrestrial (wild and domestic) vertebrates, pottery, beads, human footprints, and various artifacts including human remains buried under silt deposits with some largely exposed by natural erosion corresponding to the flood deposits of Kuiseb River (Detroit & Nankela, 2014).

As Walvis Bay became the gateway to the interior for traders, explorers, missionaries, and settlers; evidence of contact with the Western world has been registered in the episodic river delta at Walvis Bay, with over 58 sites (Ibid 2009). Here, the pastoralists reportedly traded (bartered) cattle, sheep, hides, and feathers were traded (Kinahan, 2000; 2001) for the European exotic goods such as glass beads, porcelain, gin bottles and tins food among other things (Kinahan & Kinahan, 2009). However,

during the first half of the nineteenth century importation of traded goods intensified around Walvis Bay coastline which encouraged movements further inland where merchants settled and established themselves further (Kinahan, 2000; Kinahan & Kinahan, 2009; Nankela, 2017; 2021). Although material evidence of these historical settlements is less documented and poorly preserved, debris of what is left is visible in the landscape today and can easily be mistaken for trash. The genetic character of artefacts found in these sites comprised of material trace of the European community of the time. They include remnant of building materials, broken bottles inclusive of square case gin bottles, tins, rusted copper wires and drums, old post (indicative of settlement), old clothing, fishing nets, charcoal, animal bones fragments, decorated porcelains, cups, trade beads, used bullets and consumed products i.e., shell maddens all dating from the 17th to 19th Century during intense trading economy between the European merchants and indigenous traders. Possible historic graves and skeletal remains of animals (mainly horses) might also be expected at such sites (Kinahan 2000; Nankela, 2017; 2020).

For instance, the new Wastewater Treatment Works located about 10 km near Farm No. 60 just behind Dune 7 recreational area has produced similar materials finds (Nankela, 2017). Another site near Swakop River 25km from Walvis Bay also yielded similar finds (Nankela, 2021). A further 40 km south of Walvis Bay, a commercial fishing establishment at Sandwich Harbour reportedly existing alongside the indigenous settlements from 1860 to the late 1880s who largely dependent upon wage labour and European charity” (Kinahan, 1991).

The overall distribution of heritage sites beyond KDCA decreases towards the hinterland where the proposed GHDP site lies. This is largely attributed to increased footprints of anthropogenic impacts on the environment with clear visible damages and disturbances from earlier and current constructions of infrastructure development i.e., railway line and service road, roads networks, telecommunication lines, town expansions, sewerage, and water utilities as well as increased tourism activities associated with recreational area of Dune 7. Natural impacts such as erosion (mainly by the wind and sand movements) related to coastal dynamic environment also threatens the integrity of many archaeological and historic sites in this area.

This erosion process aggravates archaeological remains including possible buried remains which might be preserved and protected under shallow sedimentary deposits. Further, coastal fogs and other form of moisture degrade artefacts and reduces the visibility of the sites. The unregulated tourism activities such as off-road driving and quad biking within the area can easily damage heritage resources unintentionally through trampling and crashing. As a result, their historical value is compromised, and its significance rating is therefore relatively very low to 0.

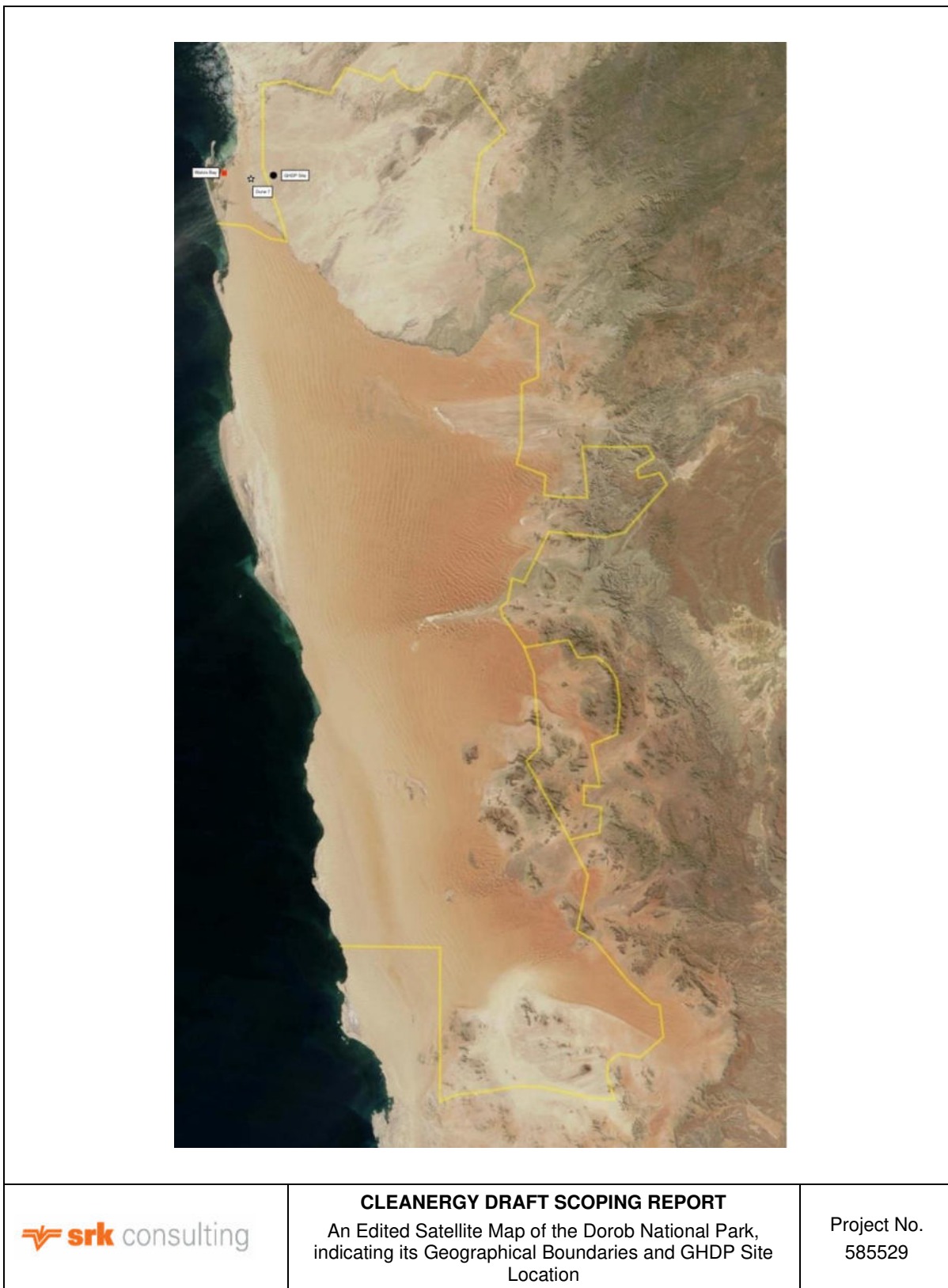


Figure 5-20: An Edited Satellite Map of the Dorob National Park, indicating its Geographical Boundaries and GHDP Site Location⁵

⁵ Source- NASA, 2006 Accessed from: <https://upload.wikimedia.org/wikipedia/commons/4/42/Namib-Naukluft-Park-Borders-Sat.jpg> on the 8th September 2022.

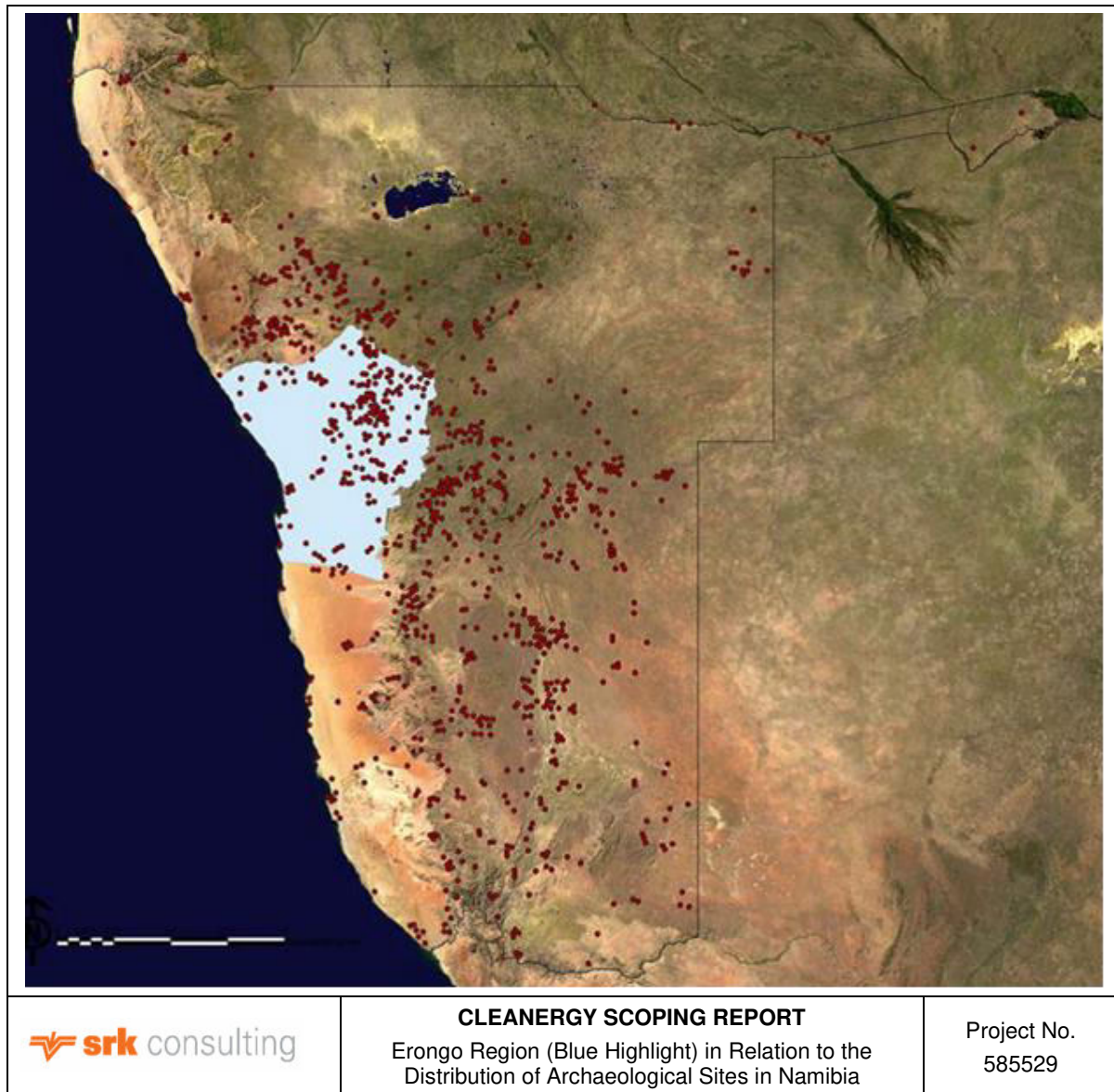


Figure 5-21: Erongo Region (Blue Highlight) in Relation to the Distribution of Archaeological Sites in Namibia (John Kinahan, 2012)

5.3.3 Data Analysis & Results

Due to relative homogeneity of the site's topography and its geomorphology, no traces of significant archaeological and historical evidence relevant under the provisions of the National heritage Act (No. 27 of 2004) were found. This is attributed to the surface disturbances related to the rehabilitations (Figure 5-22A&B), constructions, and erections infrastructure related development i.e., roads, telecommunication lines and service roads in vicinity to the proposed site. The present off-roads vehicle prints (Figure 5-23A&B) and possible recreational activities carried out in the area has also disturbed the site context. However, typical few surface finds in form of rusted tins, broken glass, and animal bones fragments (mandible) were recoded (Figure 5-25). The contexts of majority co suggests that such surface deposits might be a result of gradual aeolian erosion and natural erosion of the surface of the flood deposit rather than a secondary context by prehistoric nomads. However, if they are associated with the materials linked to the 17th to 19th Century during trading economy between the European merchants and indigenous traders, their significance is reduced considerably due to surface disturbances and the fact that these surface materials are seemingly in secondary deposition. However, one feature that stood out (Figure 5-24D) is an industrial plastic pole cut off a concrete

foundation with legible numbers that reads “RWK 227”. A quick internet search revealed that it’s a most probably a “screw compressor” which may attest to the previous industrial use of this area. However, this find was recorded in the immediate surrounding of the site limit and not within the project area.

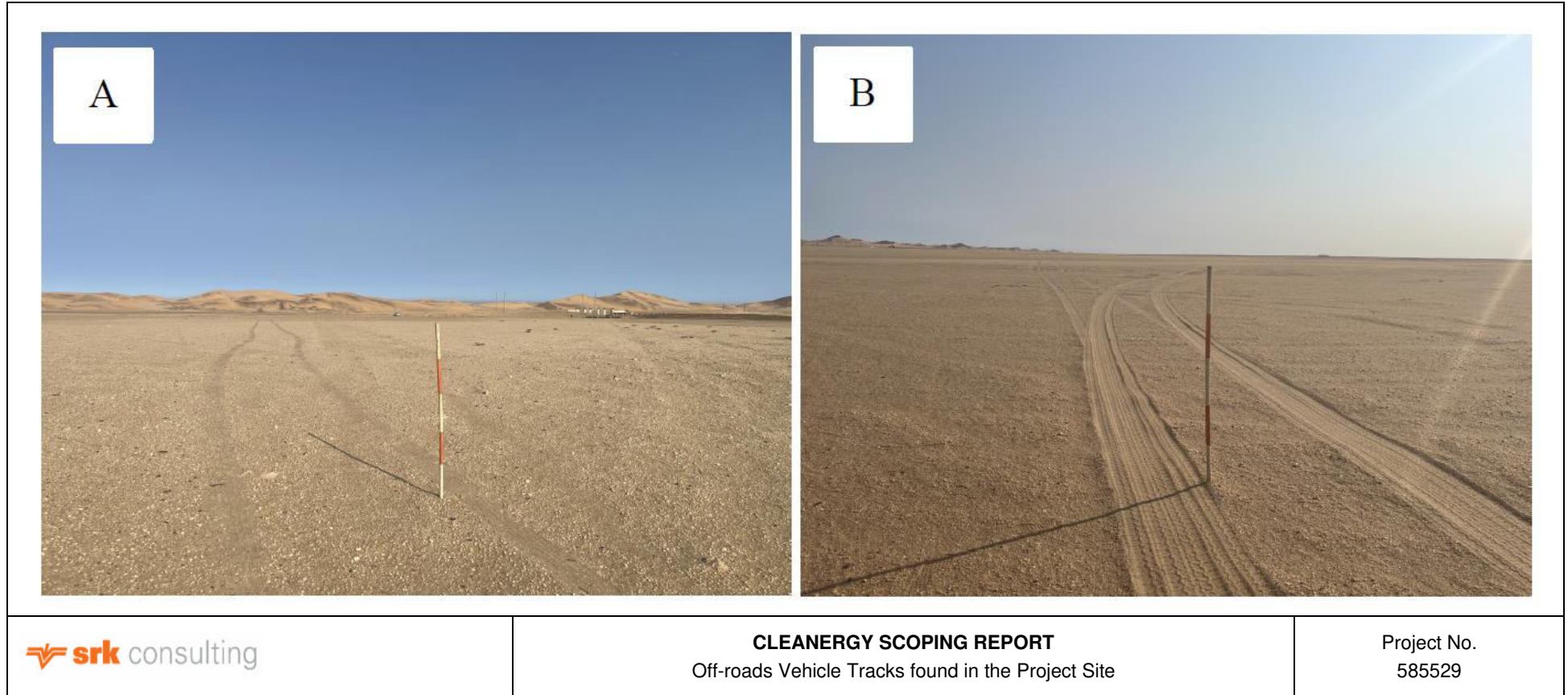


Figure 5-22: Off-roads Vehicle Tracks found in the Project Site (RCHS, 2022)

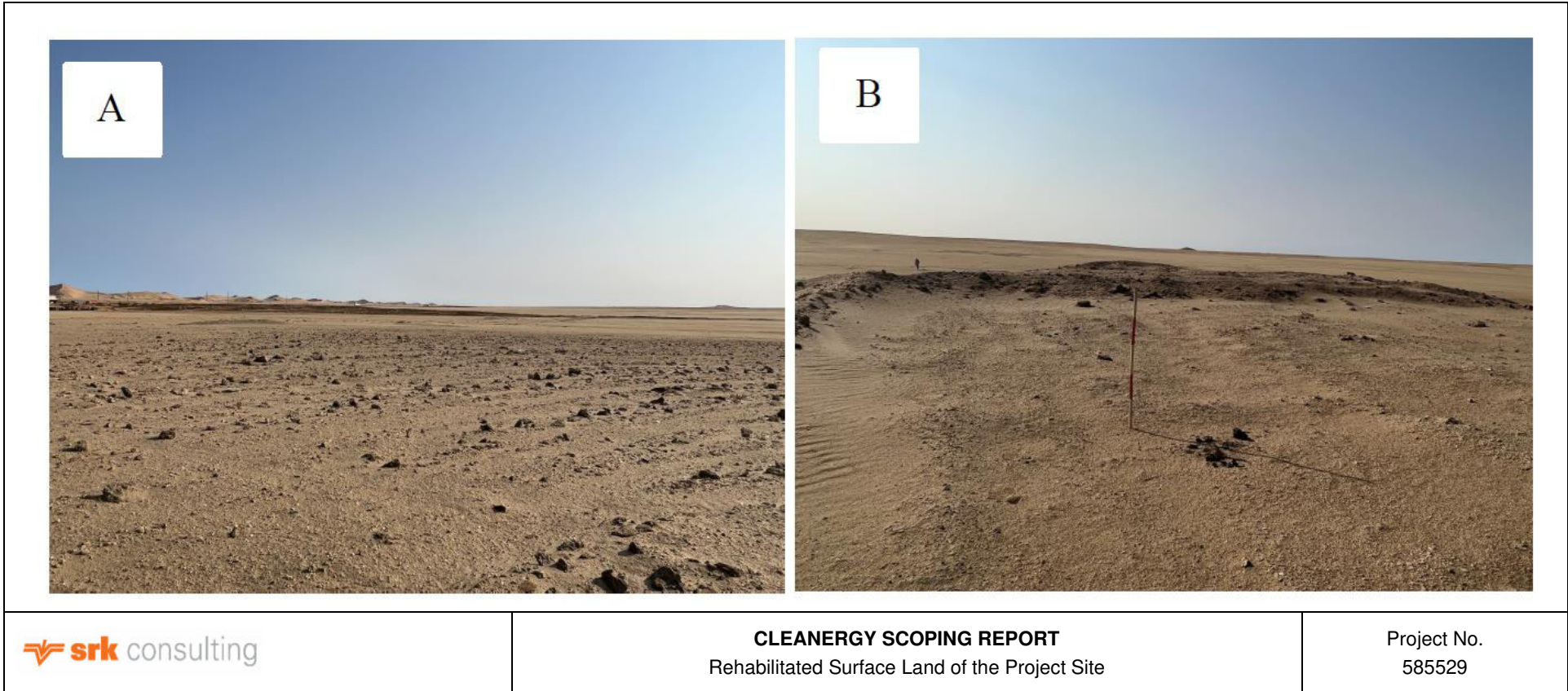
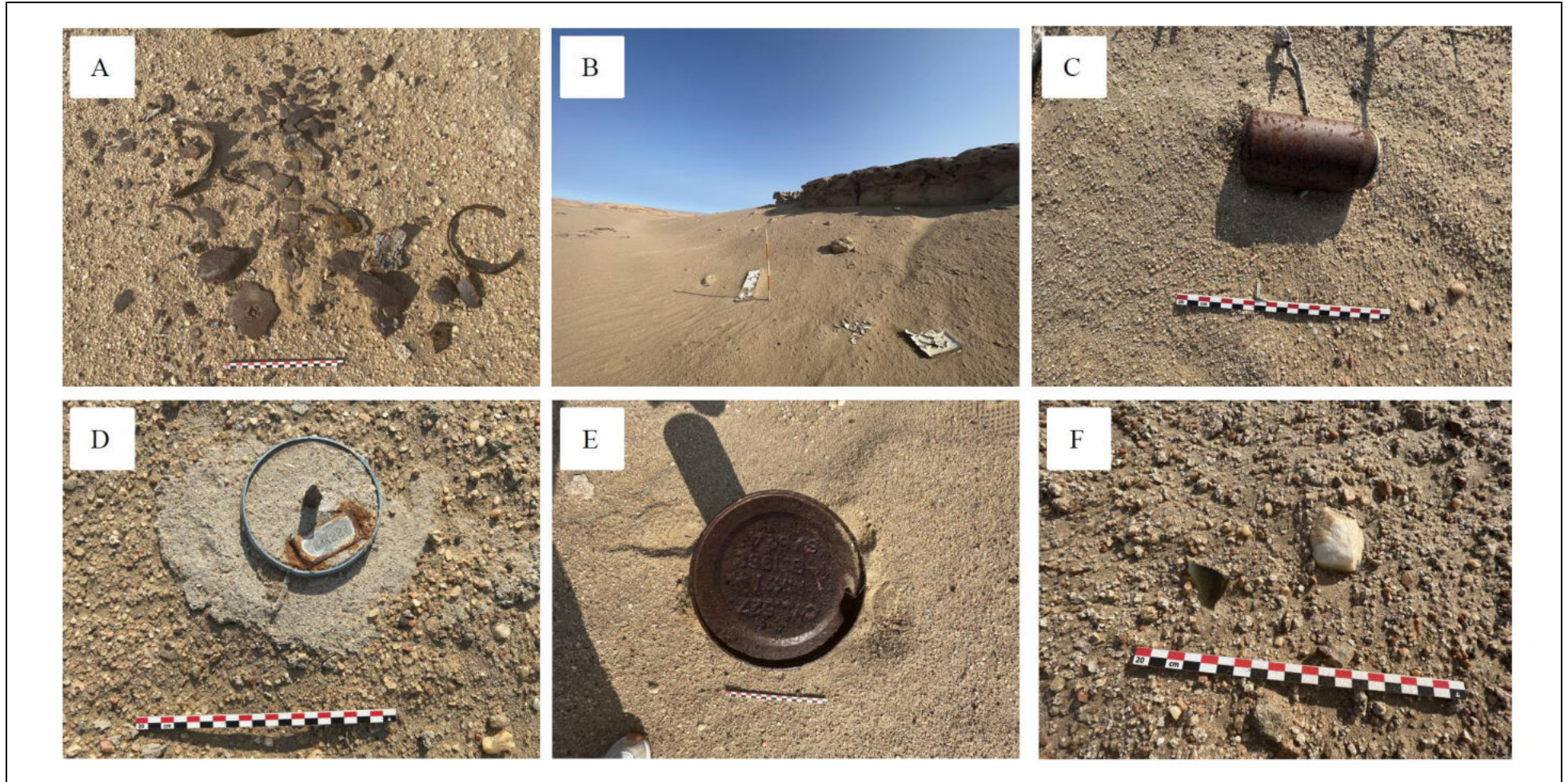


Figure 5-23: Rehabilitated Surface Land of the Project Site (RCHS, 2022)




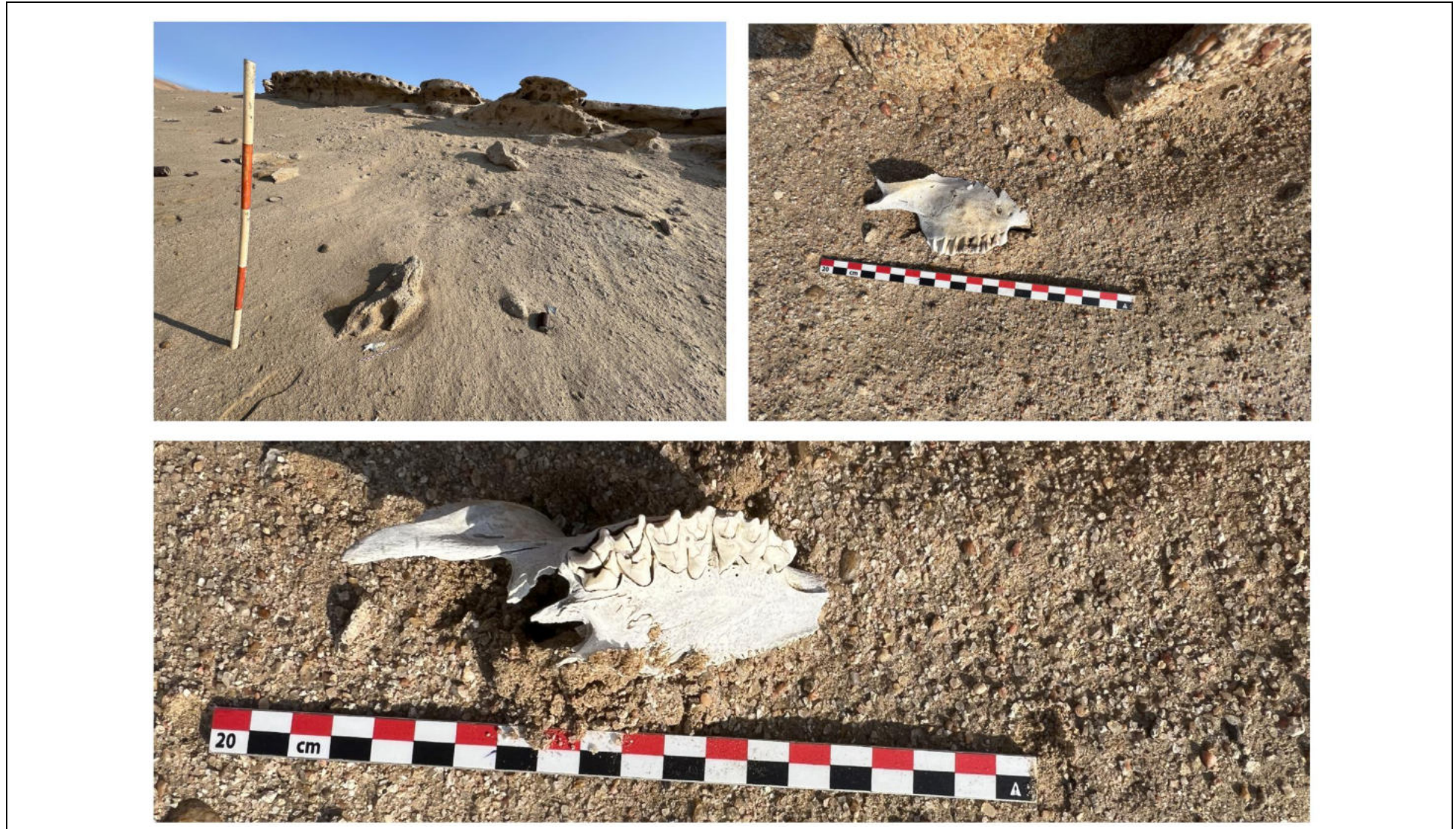
	<p>CLEANERGY SCOPING REPORT The Site Repertoire: Surface Finds within the Project Site</p>	<p>Project No. 585529</p>
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Figure 5-24: The Site Repertoire: Surface Finds with Project Site. From A, C & E is the Debris of Rusted Cans and Broken Glass while B and D are Indeterminate Objects (RCHS, 2022)




	<p align="center">CLEANERGY SCOPING REPORT A Fragment Mandible of Upper Maxillary Cheek Dental of an Unidentified Animal</p>	<p align="right">Project No. 585529</p>
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Figure 5-25: A Fragment Mandible of Upper Maxillary Cheek Dental of an Unidentified Animal / Probably a Horse (RCHS, 2022)

5.4 Surface Water

The area is bordered by the Kuiseb River to the south (Walvis Bay area) and the Swakop River to the north (Swakopmund area) with catchment areas of 15,500 km² and 30,100 km², respectively (Figure 5-26) (Cunningham, 2022).

Two important coastal wetlands – i.e., Walvis Bay Wetlands and Sandwich Harbour – both Ramsar sites, occur in the area (Cunningham, 2022). The entire coast and the Walvis Bay lagoon as a coastal wetland, are viewed as sites with special ecological importance in Namibia. The known distinctive values along the coastline are its biotic richness (arachnids, birds and lichens) with the Walvis Bay lagoon's importance being its biotic richness and migrant shorebirds as well as being the most important Ramsar site in Namibia.

The gravel plains east of the dune belt are viewed as a biodiversity "Yellow Flag Area" due to lichens and biodiversity associated with the Tumas drainage area – i.e., Tumas 'mouth' (reedbed and ephemeral spring on eastern edge of dunes) – hummocks and ephemeral wetland (Cunningham, 2022). Other important areas in the general vicinity include the biodiversity "Red Flag Areas" such as the coast immediately north of Walvis Bay (important bird area; high density of waders along beach and Damara tern breeding area); Kuiseb River (Linear oasis, riparian woodland, aquifer recharge, rich wildlife) and Swakop River (Linear oasis, riparian woodland, aquifer recharge, rich wildlife, bird light paths) (Cunningham, 2022).

The proposed development area falls adjacent the recently proclaimed Dorob National Park. No communal and freehold conservancies are located in the general area with the closest communal conservancy being the Gaingu Conservancy in the Spitzkoppe area approximately 100 km to the northeast (Cunningham, 2022).

A well vegetated hummock system in one of the ephemeral Tumas River drainage lines further to the north of the GHDP area. Such a well-developed hummock system is viewed as unique and can be compared to the sparsely vegetated drainage line in the GHDP area.

Provision has been made for the practical impacts of the proposed Cleanergy GHDP Project on surface water resources to be further assessed.

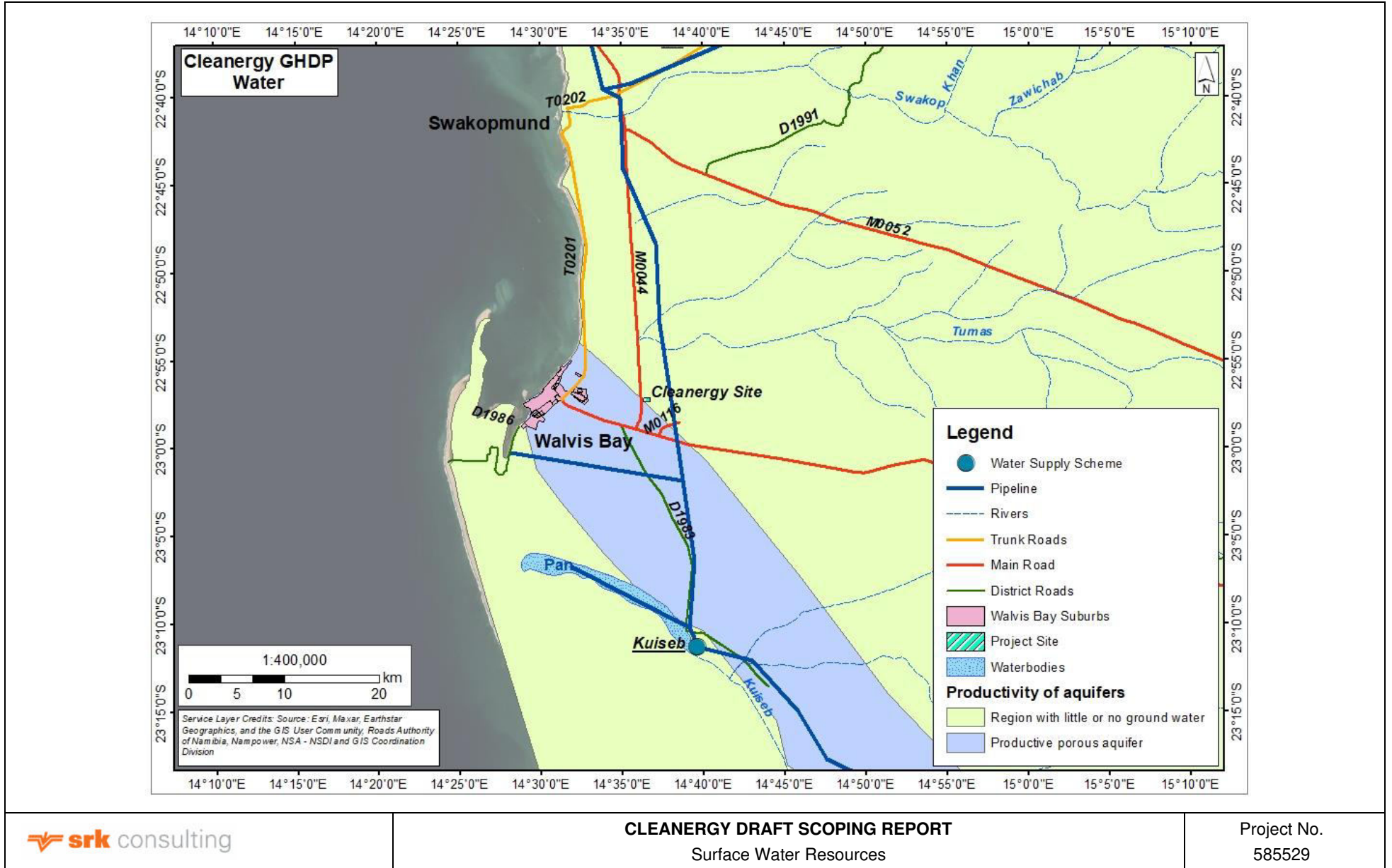


Figure 5-26: Surface Water Resources

5.5 Geohydrology

A productive porous aquifer is located within close proximity of the project site (Figure 5-26). During a site visit undertaken to the Project Site on 17 August 2022, it was evident that construction activities in the area “exposes” groundwater where the top layer of the sand is removed. Water was found ponding on surface in several of the areas in the surrounding areas. Further studies will be required in order to determine the significance of this phenomenon on the project. As such a Geohydrological Impact Assessment will be undertaken.

5.6 Topography

The gradient of the Central Namib is gradual at 1% in elevation from the coast to the escarpment foot. There are no major landscape features aside from a few river valleys, inselbergs, and dunes influencing the climate between the escarpment and the ocean (Watson & Lemon, 1985). This allows the steady development of gradients impacting temperature, humidity, fog, and wind patterns. The isohyets mostly run parallel to the coast; however, some gradients are in opposite directions, changing the climatic characteristics from the coast inland. The Central Namib was thus divided in several zones namely the Pro-Namib, eastern zone, middle zone, foggy interior zone, and cool foggy coastal zone which are analysed by vegetation, land use, and soil processes (Hachfield & Jurgens, 2000).

The terrain is overall very flat aside from Dune 7 located on the proposed site’s western side and some smaller sand dunes. The site is between 30 and 50 m above sea level.

The study area for the proposed Cleanergy GHDP terrain is overall very flat aside from Dune 7 located on the proposed site’s western side and some smaller sand dunes. The site is between 30 and 50 m above sea level (Topographic-map, 2022). A depiction of the area’s topography is provided in Figure 5-27.

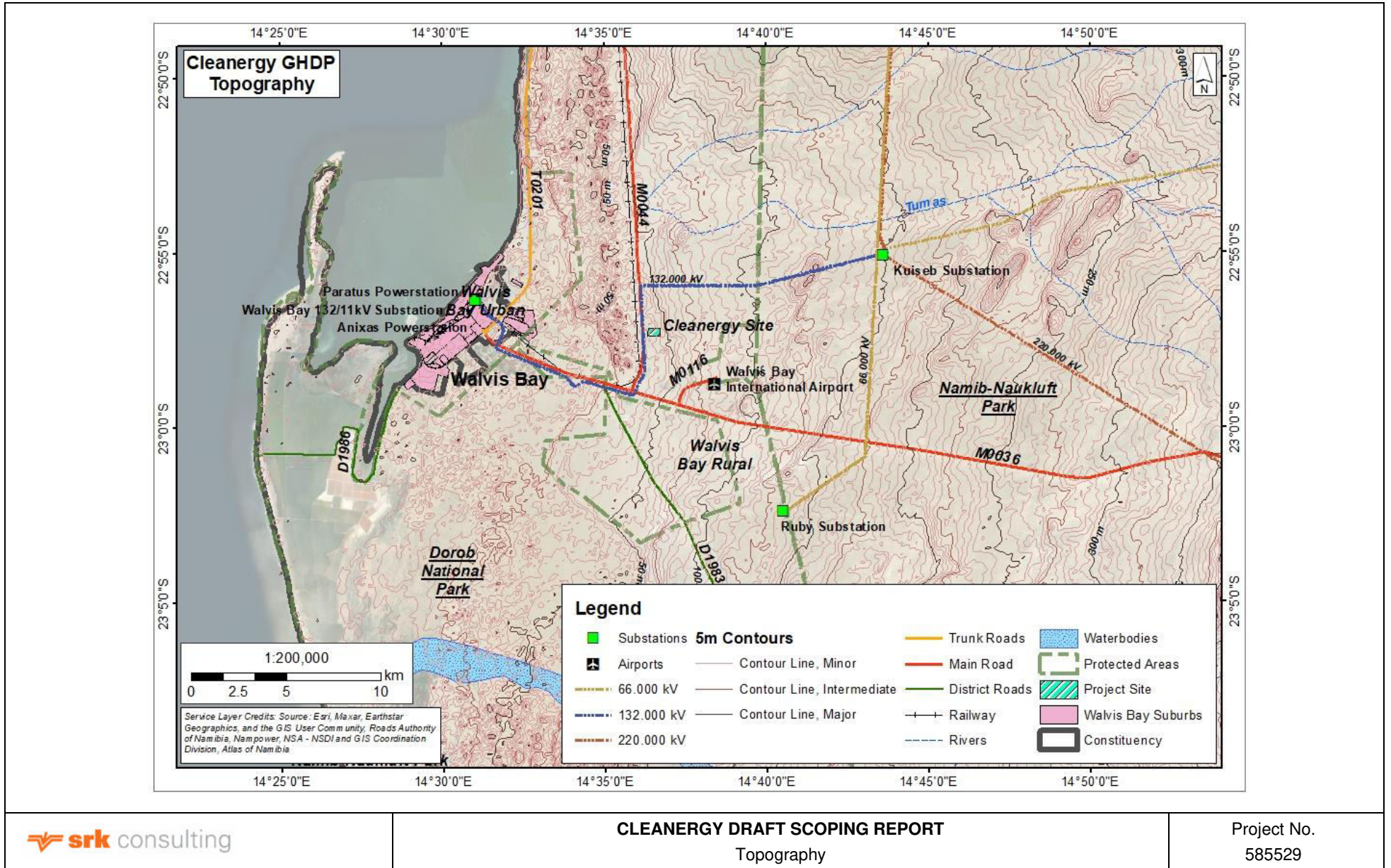


Figure 5-27: Topography

5.7 Visual

This Section has been extracted from InSite Landscape Architects Report, 2022. Within the wider region and context of the receiving environment, the area has been modified due to numerous infrastructure-related and manmade interventions such as roads, bridges etc. In stark contrast with this is the Natural uniqueness of the Dorob National Park and within that, Dune 7 desert landscape that dominates the skyline to the east of the study area.

In terms of the natural uniqueness, “irreplaceability” of the site and within local, regional and international context the scenic, landmark and therefore tourism significance of Dune 7 is noted. Dune 7 is the highest dune in Namibia. The dune has been measured at over 383 meters and is named Dune 7 because it is the seventh dune one encounters after crossing the river Tsauchab. In the context of the surrounding region, at a local, regional and national scale, plus the site has international relevance as a world-famous tourist attraction.

Dune 7 is located within the Dorob National Park (“dry land”) is a protected area in Erongo, along the central Namibian coast, which stretches along the coastline for 1,600 kilometres. The proposed development site is located (east) in a direct line approximately 500 m outside the conservation area.

In terms of the general visual sensitivity of the affected environment the site is vulnerable and exposed. The general sensitivity originates from the largely flat and very subtle undulating macro landscape to the east and south. To the east are open vistas and on contrast with the “buffered” natural desert dunes to the west of the site. This expansive landscape is more sensitive to visual impacts due to the very low vegetation cover.

Visual Sensitivity, in this instance, refers to the capacity of an environment to tolerate disturbance (taking the environment’s natural capacity to recover from disturbance as well as existing cumulative impacts into account).

The proposed development footprint itself is located on an already modified and disturbed landscape, thus resulting in a very little, or no permanent loss of vegetation cover or of a natural landscape.

The affected environment could be categorised as having a low tolerance to disturbance and is mainly due to the macro landscape, context, and exposed short, medium and long-range views to the east. These sensitivities influence the sensitivity of the overall system, mainly due to the location of the existing aerodrome in relation to the proposed development site.

The below baseline Visual Impact Assessment data collection was completed thorough literature review as well as a site investigation and field survey conducted on 23 and 24 August 2022.

5.7.1 Visual Character

The physical and landscape related baseline and characteristics of the study area are described in Section 5.6 of the report and contribute to its overall visual character and uniqueness of the landscape and “landscape sense of place” also known as genius loci.

Landscape character is defined here as a “distinct, recognisable, and consistent pattern of elements in the landscape that makes one landscape different from another...” (Swanwick, 2002).

Visual character largely depends on the level of change or transformation from a natural baseline in which there is little evidence of human transformation of the landscape, to a modified and ultimately transformed landscape.

Varying degrees of human transformation of a landscape would result in differing visual characteristic to that landscape, with a highly modified urban or industrial landscape being at the opposite end of the scale to a largely natural, pristine, totally undisturbed, or natural landscape.

- Visual character is also influenced by the presence of built infrastructure including buildings, roads, and other objects such as telephone and electric infrastructure. In the case of the proposed study area all of the following linear elements influence the visual baseline:
 - Ongoing road works and road widening (highway under construction);
 - Existing railway line;
 - Existing power lines all run in a general north south direction and mostly linear development footprints; and
 - Arterial roads and temporary and/or permanent access roads.

The visual character of an area largely determines the 'sense of place' relevant to the area. The 'sense of place' is generally defined by its unique quality or character of a place, whether natural, rural, or urban which results in a uniqueness, distinctiveness, or strong identity. The level of modification, and therefore the identity of the study area is varying:

- Across much of the western portion of the study area there are relatively low levels of human transformation and visual degradation is low, and as such the natural character has been largely retained;
- The flowing desert landscape and unique identity is strongly supported by the uniqueness and landmark status associated with Dune 7; and
- Much of the eastern portion of the study area has however been transformed resulting in vast and open wasteland visual character in these areas.
- The areas east of the railway is largely modified and a transformed landscape (Figure 5-28).

The level of transformation in the landscape is an important factor in this context, as the introduction of the proposed Cleanergy Green Hydrogen Demonstration Plant (GHP) Walvis Bay, would result in less visual contrast, where other manmade elements are already present.

In this instance the level of contrast will be highly evident, most especially the Solar PV Array, but also the other resulting infrastructure associated with the Cleanergy Demonstration Plant (GHP).

The scenic quality of the landscape is also an important factor contributing to the visual character of an area or the inherent 'sense of place'.

Visual appeal is often associated with unique natural features or distinct variation in landform, shapes, and texture, which in this case is very evident within the greater landscape, but also local context and uniqueness of the study area.

Note that the nature of the receiving environment is such that any development footprint plus vertical scale gets emphasized in the vastness of the landscape. As a result, the largely natural and unspoilt desert landscape (macro environment) features as the dominant landform in an otherwise modified (micro) environment.

Noted furthermore that the existing Nature Conservation area that is located west of the development footprint increase the scenic appeal (e.g., as a tourism destination) as well as landscape and visual interest of the area.

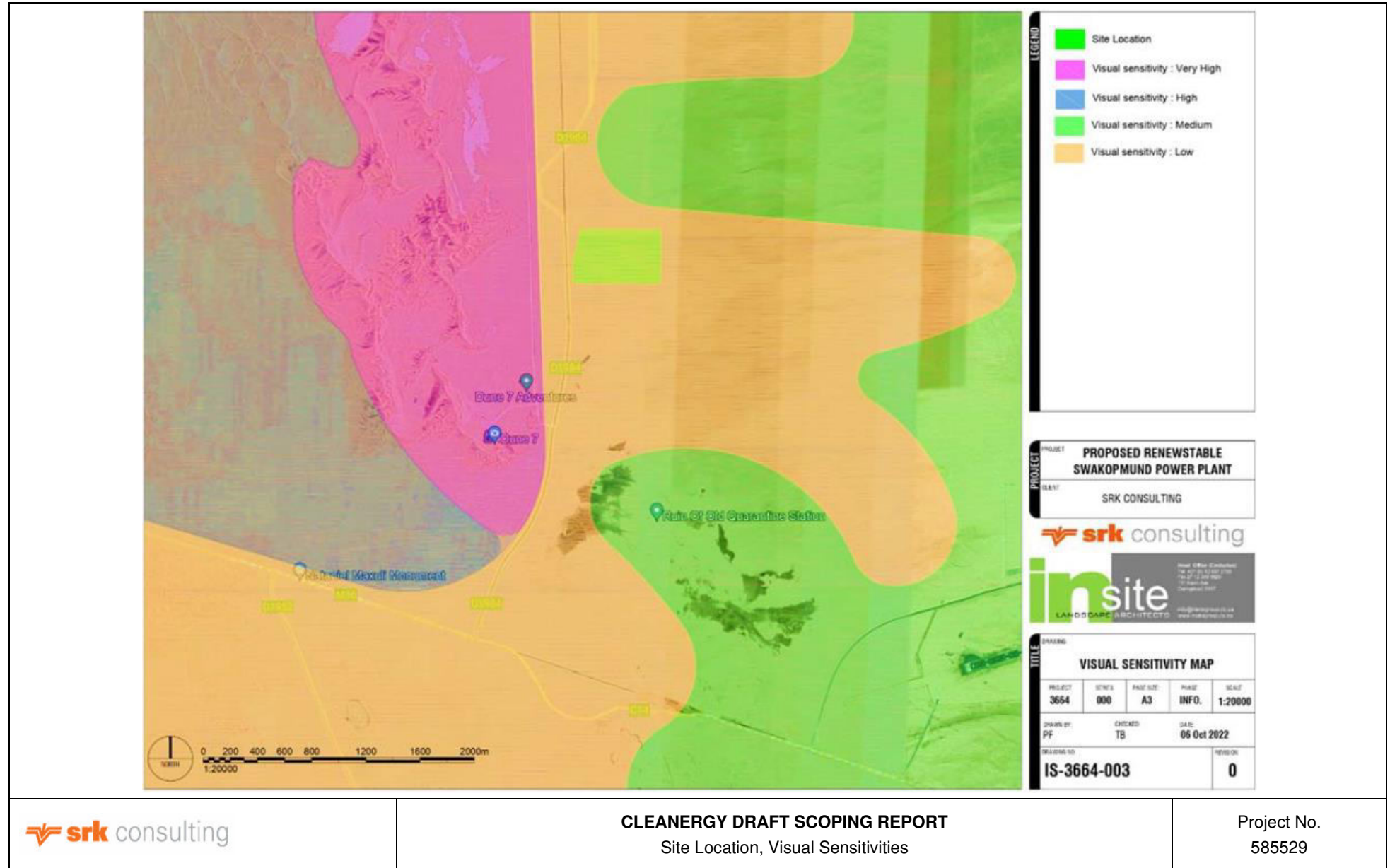


Figure 5-29: Visual Sensitivity Map

5.7.2 Visual Absorption Capacity

Visual absorption capacity is the ability of the landscape to absorb a proposed new development without any significant change in the visual character and quality of the existing landscape.

The level of absorption is largely based on the physical characteristics of the landscape (existing topography, landform, and vegetation cover), and the level of transformation that is present in the landscape. Any visual and landscape intervention is emphasized within the relative exposed and relatively flat topography of the study area. The lack of vegetation found in a desert environment will further reduce the visual absorption capacity of the study area. This would be offset to a smaller extent because much of the adjacent landscape, east and south of the study area have already undergone large scale transformation.

The absence of a direct visual link to the urban development beyond the dunes (west of the development footprint) will make the site more protected and buffered from long range views to and from the site in a western direction. In contrast the ongoing extensive roads upgrade and existing airport developments and associated infrastructure and close proximity to the proposed project will marginally increase the overall visual absorption capacity of the landscape.

5.7.3 Visual Implications

Areas of flat relief towards the eastern portion of the study area are characterized by wide open ranging vistas, whilst views westwards will be constrained by the higher line of sand dunes evident in the landscape in the western sector of the study area.

The position of the viewer within the landscape will influence the types of vistas to be experienced. Viewers located within a more raised position e.g., roadways and elevated dunes etc will have direct views of the proposed development site.

Viewers located within a more defined valley for example would have limited or constrained vistas.

Notably the same is also true of objects placed at different elevations and within different landscapes, and different settings or visual contexts. Typically objects or developments placed on higher-elevations, slopes or ridgelines would be more visible, while those placed in valleys or in case plateaus would be notably less visible. In the context of this GHDP development and the associated elements will not be located in high elevation or slopes or on ridgelines and as such will be a low impact on the skyline.

Localised Topographic variations may limit views of the development from some part of the study area, but across the remainder of the study area there will be little topographic shielding to reduce the visibility, especially those of larger elements of the proposed project (both vertically and horizontally larger elements area noted).

From the locally occurring receptor locations, then considering that the PV panels will be the most visible element of the proposed development, a viewshed analysis for the proposed PV development footprint was done (Figure 5-30).

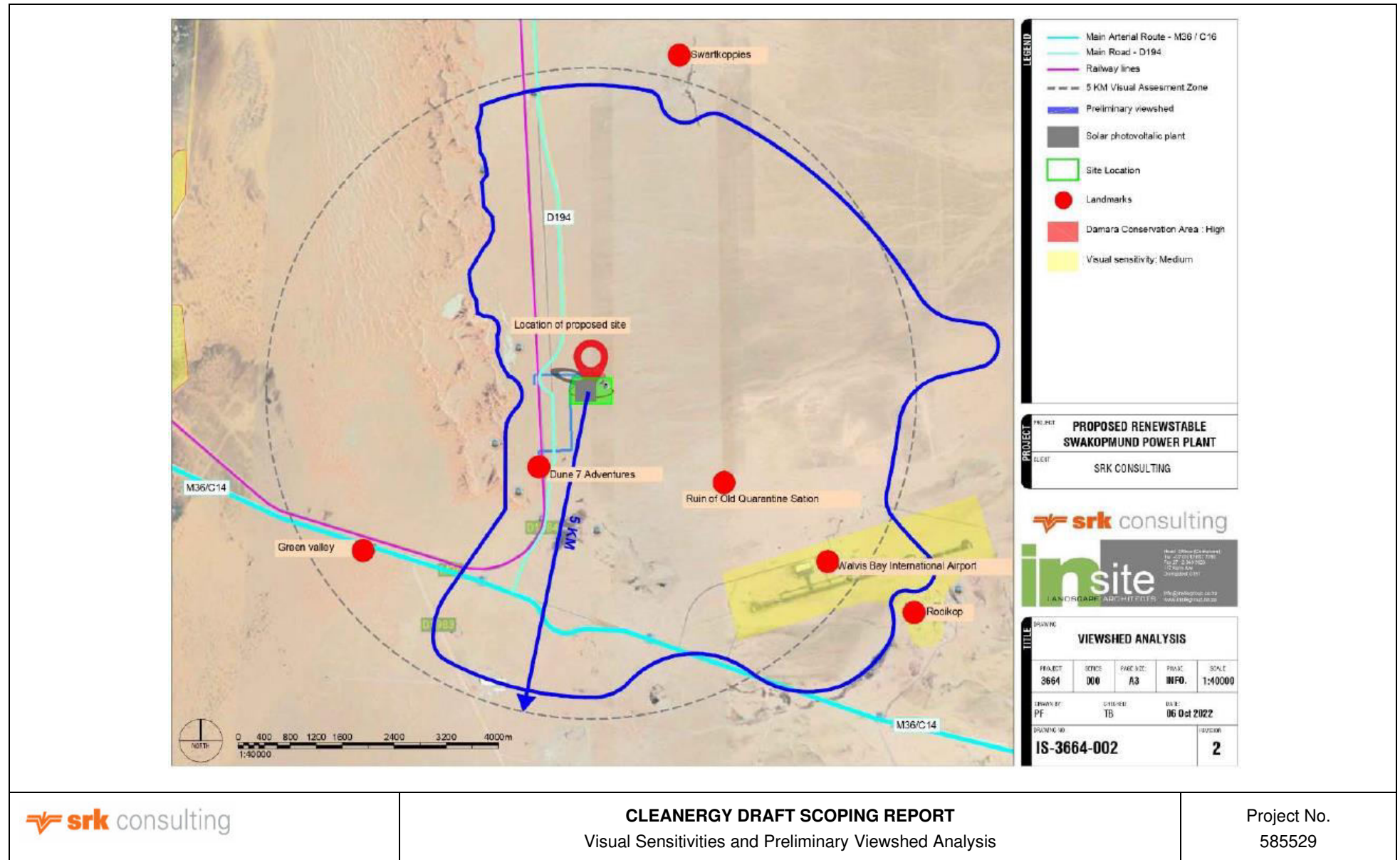


Figure 5-30: Viewshed Analysis in terms of Local Landmarks

A worst-case scenario will be assumed when undertaking the analysis in which the proposed PV panels will be signed a maximum height of 14 meters. It is, however, anticipated that the proposed PV panels will not be higher than 2 meters. The resulting viewshed as shown in Figure 5-30 indicates that the solar PV arrays would be visible, or partially visible from much of the southern and eastern sector of the study area.

This analysis is restricted to the visibility of the GHDP and does not consider the other elements of the proposed roadway and resulting highway, interchange and resulting infrastructure upgrades.

See attached artist impression of the proposed development; refer to Figure 5-31 and Figure 5-32.

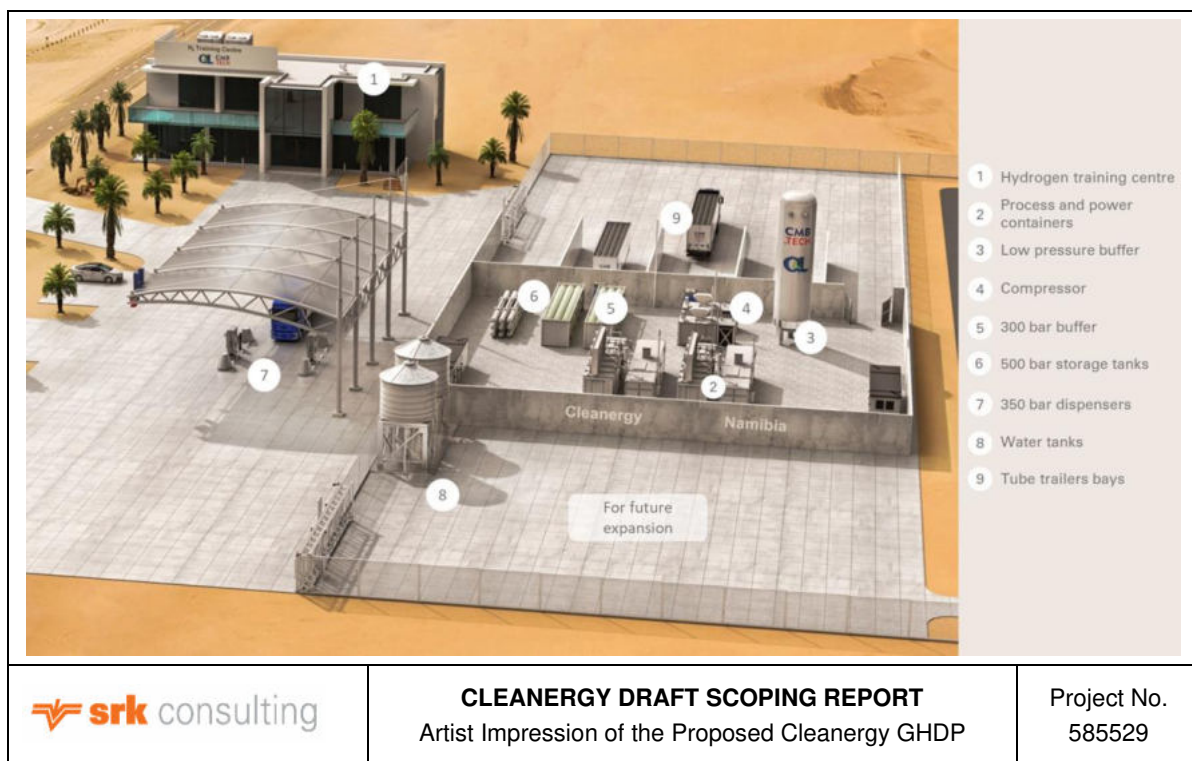


Figure 5-31: Artist Impression of the Proposed Cleanergy GHDP

Figure 5 3 Artist impression of the proposed development Cleanergy GHDP and various operational components.

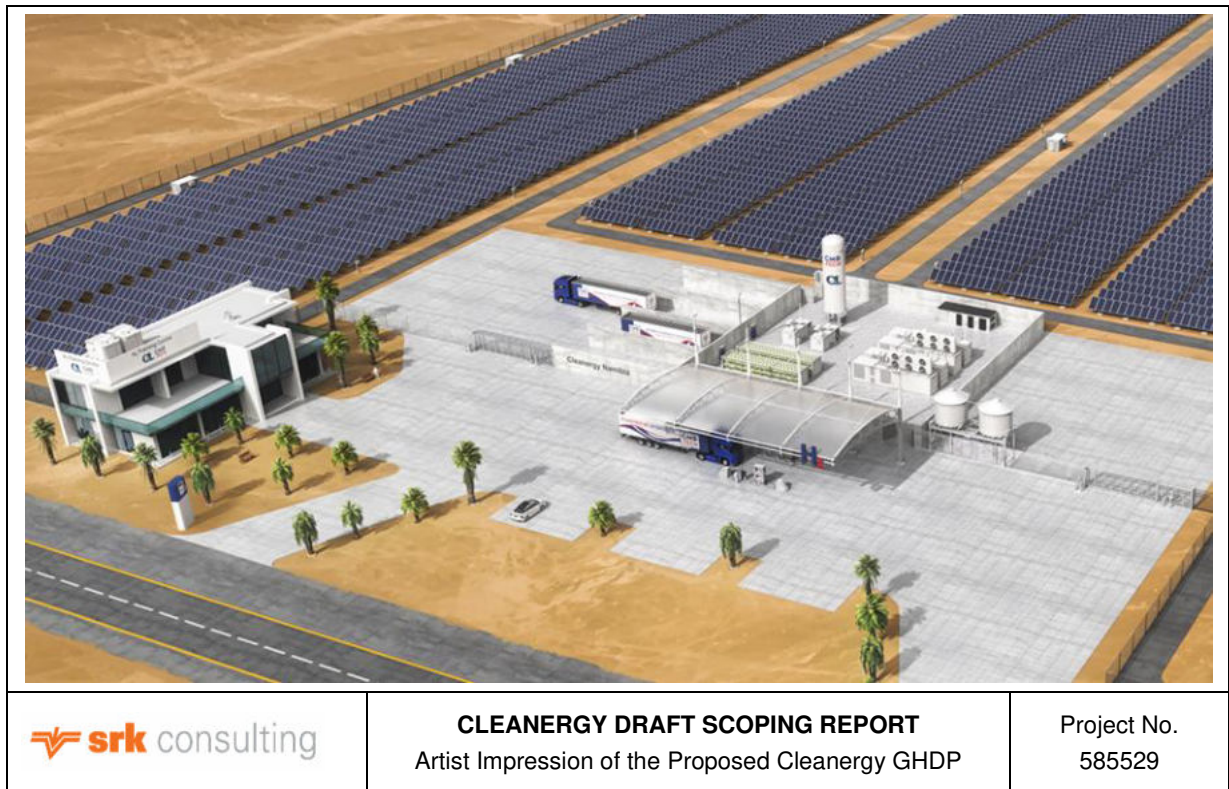


Figure 5-32: Artist Impression of the Proposed Cleanergy GHDP (2)

5.7.4 Glint and Glare of the Proposed Photovoltaic Panels

Broadly translated (visual) receptors are sensitive elements, which absorb light, and transmit the visual signal to the brain.

Ground based receptors as identified on the attached maps for this project include:

- Existing railway;
- Freeway adjacent to the development; and
- Local identified tourist attractions including Dune 7 and various associated buildings.

Aviation receptors are those specific towards the aviation industry and associated infrastructure. Receptors include:

- Walvis Bay International Airport, Namibia;
- Air traffic control (ATC) tower; and
- Aircraft in aerodromes on final approach or departure from runways.

Glint can be described as a direct reflection of the sun from the surface of the solar PV panel and can be described as a momentary flash of light.

Glare is significantly less intense in comparison to glint and can be described as a continuous source of bright light, relative or in comparison to a diffused light.

The Visual Impact Assessment will consider best practise and international as well as local aviation authority guidelines with regards to glint and glare. The study will also review and assess the potential visual hazard regarding light-sensitive receptors for solar (photovoltaic) developments and infrastructure with reflective surfaces. This will be documented in relation to background and research studies documented and reported – by others.

The ICOA (part II) Land use and environmental management guideline Chapter 4 Page 4-15 states, in terms of airport support elements and renewable sources of power generation, that:

“Consideration of a large solar array should be accompanied by an ocular analysis of glint and glare. This will help identify solar panel orientation that maximise system performance while eliminating risk of glint and glare which could be hazardous to air traffic control and pilots”

A Visual Impact Assessment will be undertaken to assess the practical impacts of the proposed Cleanergy GHDP Project and to develop appropriate environmental management measures to reduce the impact thereof.

5.8 Climate

The Erongo Region, located in the western part of Namibia, falls within the west coast arid zone of southern Africa, and is characterised by low rainfall, extreme temperatures and unique climatic factors influencing the natural environment and biodiversity. Episodic dust storms, associated with easterly wind conditions, are common during austral autumn and winter months. During these events, dust is transported westwards over long distances across the Namibian continent towards the Atlantic Ocean (Liebenberg-Enslin *et al.*, 2017). This descend of air leads to a drop in air pressure as a result of vertical air column expansion, and the development of warm berg-wind conditions as a result of adiabatic heating. Although strong, hot, and often uncomfortable for people, easterly wind conditions are usually relatively short lived (Liebenberg-Enslin *et al.*, 2017).

5.8.1 Temperature

Although temperatures vary throughout the year, the average annual temperature for the general area is 16-18°C with the average maximum and minimum temperatures varying between 22-24°C and 10-12°C, respectively. Frost is uncommon in this area. The relative humidity between the least and most humid months varies between 50-60% and >90%, respectively with the average annual rainfall being between <50mm. Variation in annual rainfall is however quite high with >100%.

Figure 5-33 shows that maximum temperatures for Walvis Bay stay fairly constant from December to May with an average range between 19.1 °C and 20.4 °C and vary between 18.7 °C and 17.6 °C from June to November. The minimum temperatures are also fairly constant between December and March, ranging between 14.1 °C and 15.1 °C, while the minimum temperatures vary more between April and November, ranging from 9.9 °C and 12.6 °C (Weather Atlas, 2022).

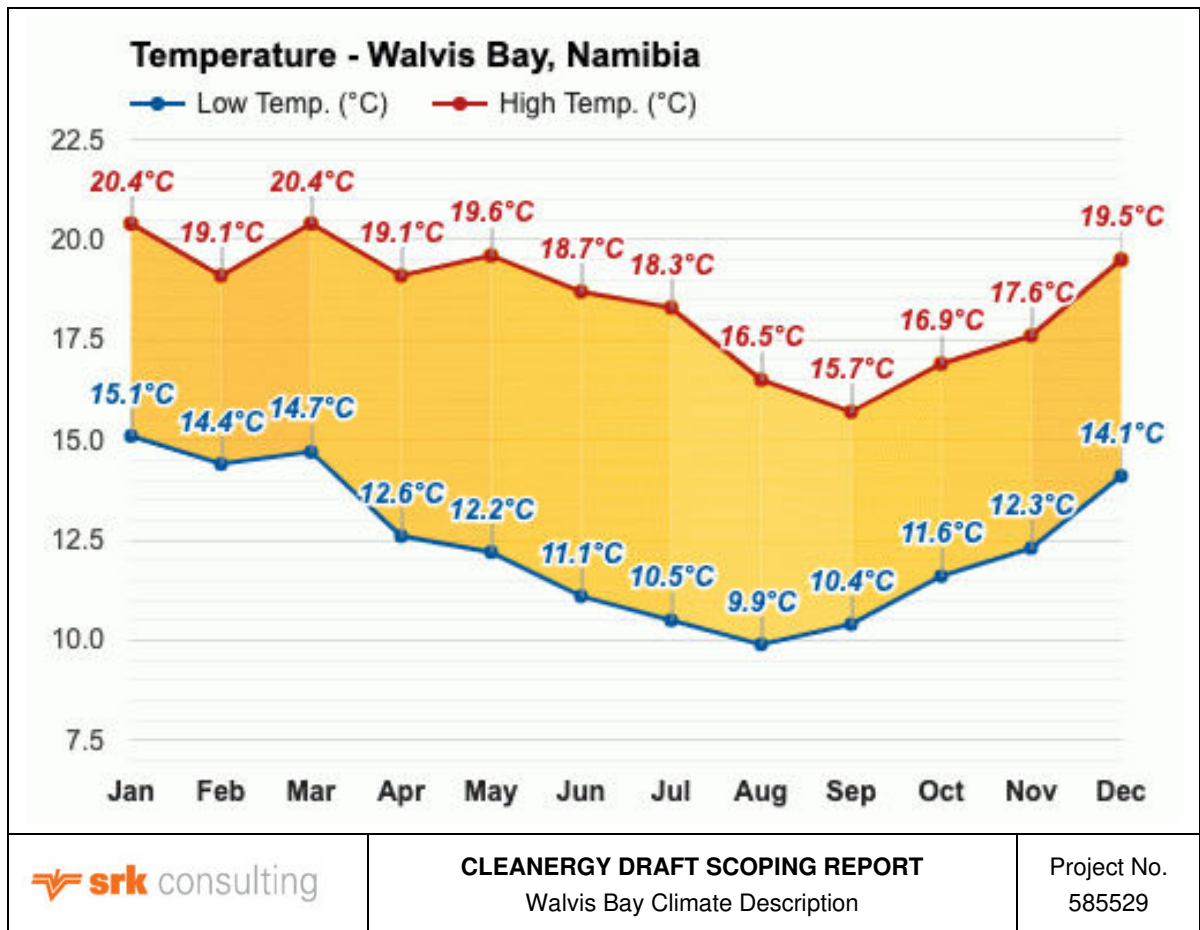


Figure 5-33: Walvis Bay Temperatures (°C) (Weather Atlas, 2022).

5.8.2 Humidity

The relative humidity for the Walvis Bay area is high, ranging from a high of 81% in January and March to a low of 65% to 71% in May, June, July, and December (Figure 5-34) (Weather Atlas, 2022).

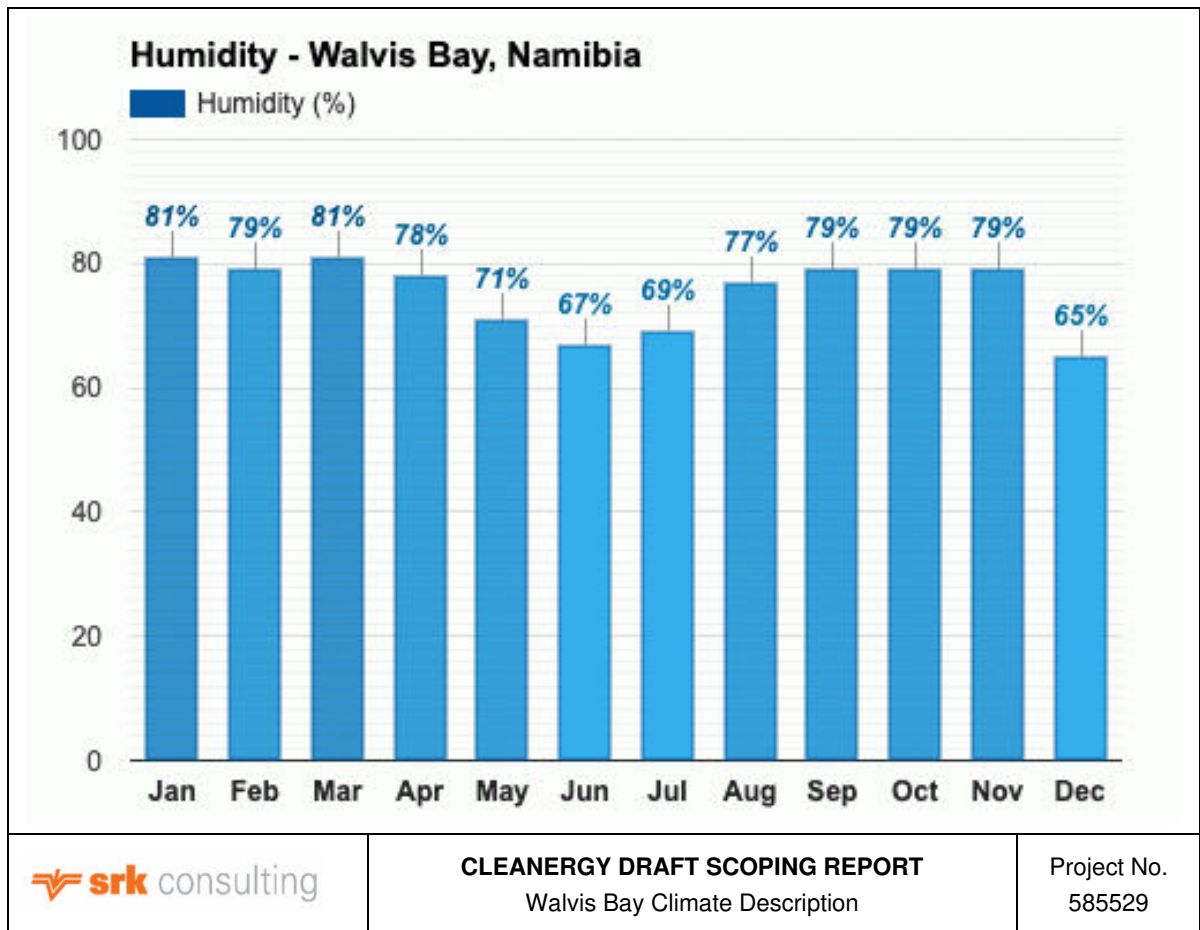


Figure 5-34: Walvis Bay Relative Humidity (%) (Weather Atlas, 2022).

5.8.3 Rainfall

Figure 5-35 illustrates that rainfall is more-or-less evenly spread from July to December for the Walvis Bay Area. The average amount of rainfall is slightly higher in January and from April to June and peaks in March at 4.4 mm (Weather Atlas, 2022).

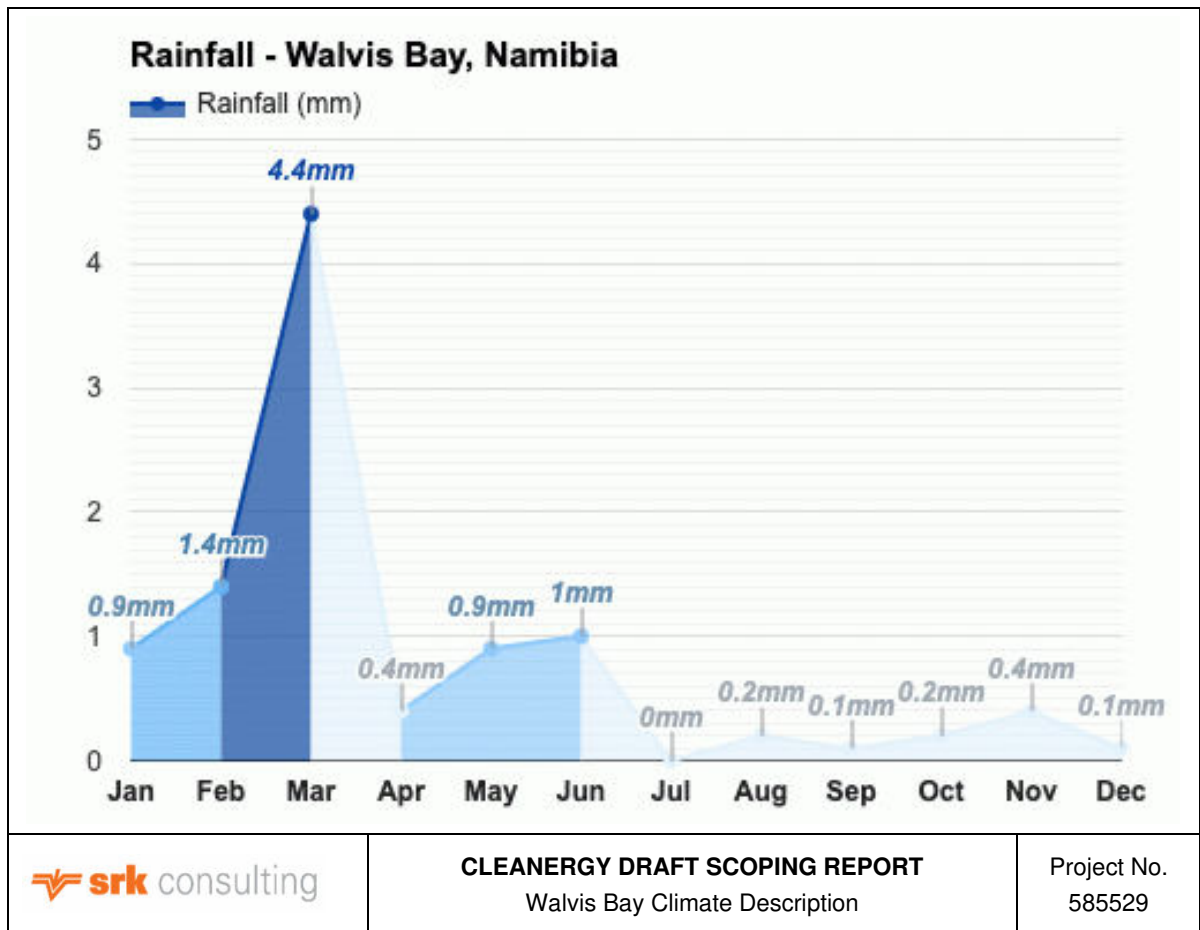


Figure 5-35: Walvis Bay Rainfall (mm) (Weather Atlas, 2022).

5.9 Soils

The most common soils in Namibia are arenosols (sandy soils) and leptosols (young soils on fertile rock). Fertile fluvisols are only found along ephemeral river courses and in the Caprivi region. Walvis Bay specifically is situated on petric gypsisols (Kamuhelo, 2015) which are soils with a substantial secondary accumulation of Gypsum (Schreiber & Schneider, 2001).

The dominant soils present at the Cleanergy GHDP Project area are described as petric gypsisols – i.e., soils with a solid layer at a shallow depth that remains hard even when wet with an accumulation of calcium sulphate restricted to the very dry areas of the Namib. These soils are typically low in fertility with only the hardiest plants able to survive in them (Mendelsohn *et al.*, 2002).

Soils of the regions are provided in Figure 5-36. Land use of the proposed project site is zoned as Heavy Industrial Area.

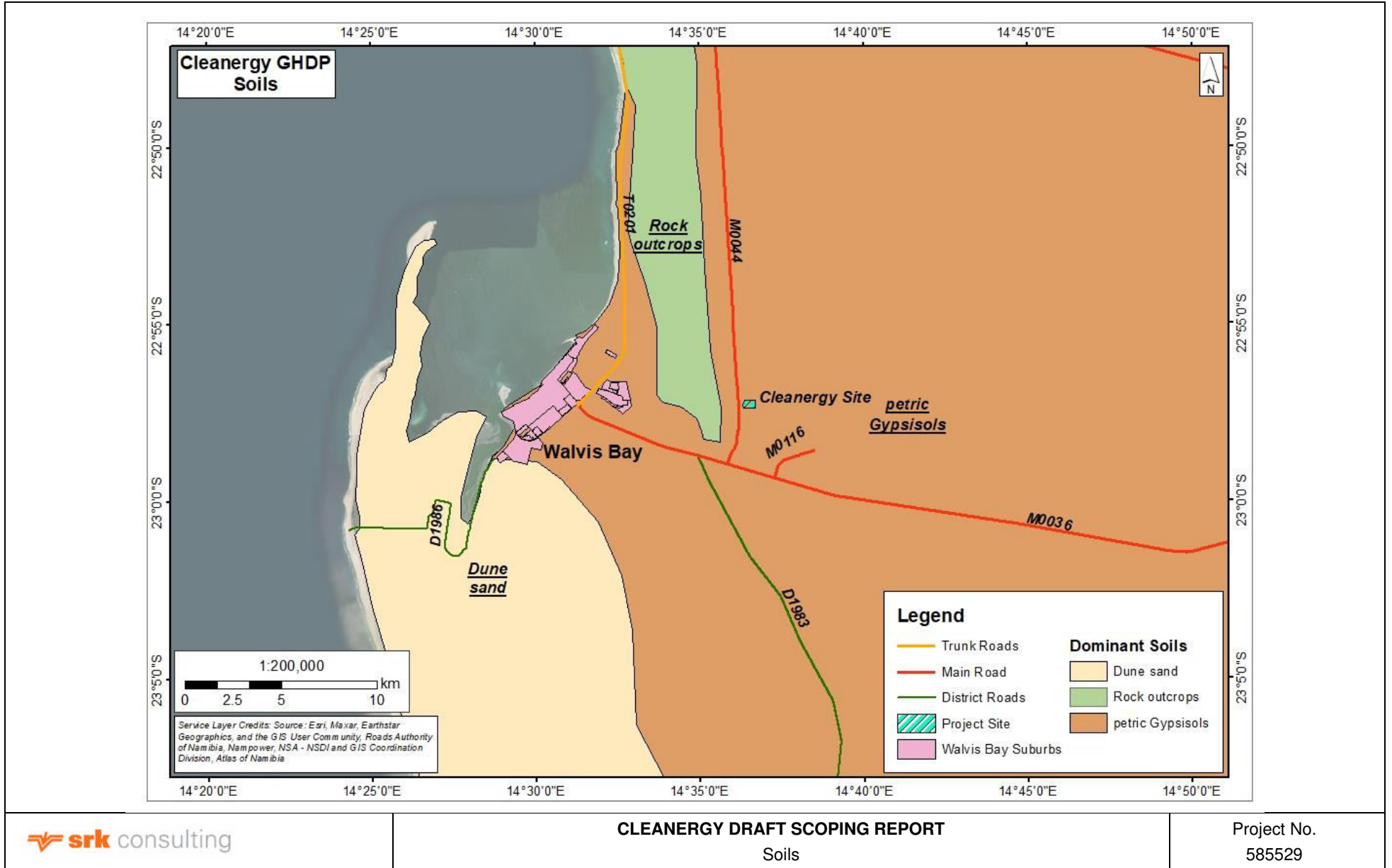


Figure 5-36: Soil Map

5.10 Land Uses

5.10.1 Current Land Uses

Walvis Bay is situated in Erongo Region along the western coast of Namibia, about 30 km from Swakopmund and 400 km west of Windhoek. Its northern borders of the town area stretch right from the middle of the Swakop River while its southern boundaries stretch up to the Kuiseb River. The eastern boundary extends into the Namib Desert all the way up the Namib Naukluft Park. To the west, the town area covers the famous Pelican Bay area. In total, the Walvis Bay town area covers an area of approximately 1124 km² in extent (SLR, 2022).

Urbanisation is a phenomenon which is observed all over the world, but it is particularly virulent in Africa. Namibia is no exception, and nor is Walvis Bay, where urban growth has been overwhelming in recent years. Walvis Bay is the third largest urban settlement in Namibia after Windhoek, the Capital City and Rundu (Worldatlas, 2022).

The town's strategic location and position has led it to become Namibia's only harbour town able to accommodate larger ships. These deep-sea harbour qualities led to various industrial growths, particularly the fishing industry, which is the primary industrial sector due to the boats at the harbour as well as large cargo handling owing to the deep and stable port. The port and fishing industry attracted many supporting industrial services such as the transportation services of bulk goods in all rail, air, and road networks. This strategic advantage not only serves the rest of the country but goes as far as serving all neighbouring landlocked countries such as Zimbabwe, Zambia and Botswana.

The well-developed road network links Walvis Bay to the rest of the country and SADC region, making it accessible to the central and southern regions of the country. The existing railway line is also well connected to the rest of the country. The Walvis Bay Airport is the second major gateway that is developed and managed by Namibian Airports Company.

Subsequent to the above background, Walvis Bay has become a national node resulting in increased in-migration as well as internal population growth (New Era Live, 2021). The town is growing rapidly due to increased employment opportunities created as many more industrial activities are earmarked for the town of Walvis Bay. Although seen by many as an unhealthy trend, especially where the physical manifestation is unplanned and unhygienic squatter camps, it is now generally recognized that rural-urban migration usually provides better life options for the marginalized poor leaving rural areas. At first, migrants will find themselves in a highly uncomfortable environment without access to adequate shelter, water or sanitation. They will, however, find better access to health and education and they will have the opportunity to find a job or to engage in informal economic activities. Life expectancy is notably better in towns than it is in the rural areas (Hitula, 2011). The property market is also growing rapidly due to the developments along the coast offering some of the best sea front properties. These developments also attract a high influx of holiday makers as well as holiday homes. In addition, more immigrants in search of employment opportunities need housing and accommodation, creating a serious housing shortage. This can be seen by the number of increased back yard shacks within the Kuisebmond Township and the number of requested general residential housing projects which yield high numbers of low to middle income housing. This has resulted into a direct competition between housing development and industrial growth in general (Hitula, 2011).

Figure 5-37 illustrates existing districts and suburbs.

The proposed project area is located within an area zoned as Heavy Industrial Area. The Proposed Cleanergy GHDP Project Area does not have any major unique habitats, is not in a pristine condition and is heavily impacted by various anthropomorphic activities. However, the gravel plains east of the

mobile dune belt are classified as a “biodiversity yellow flag” i.e., habitats or migration routes which are critical for species’ survival. This area falls outside of the immediate project area.

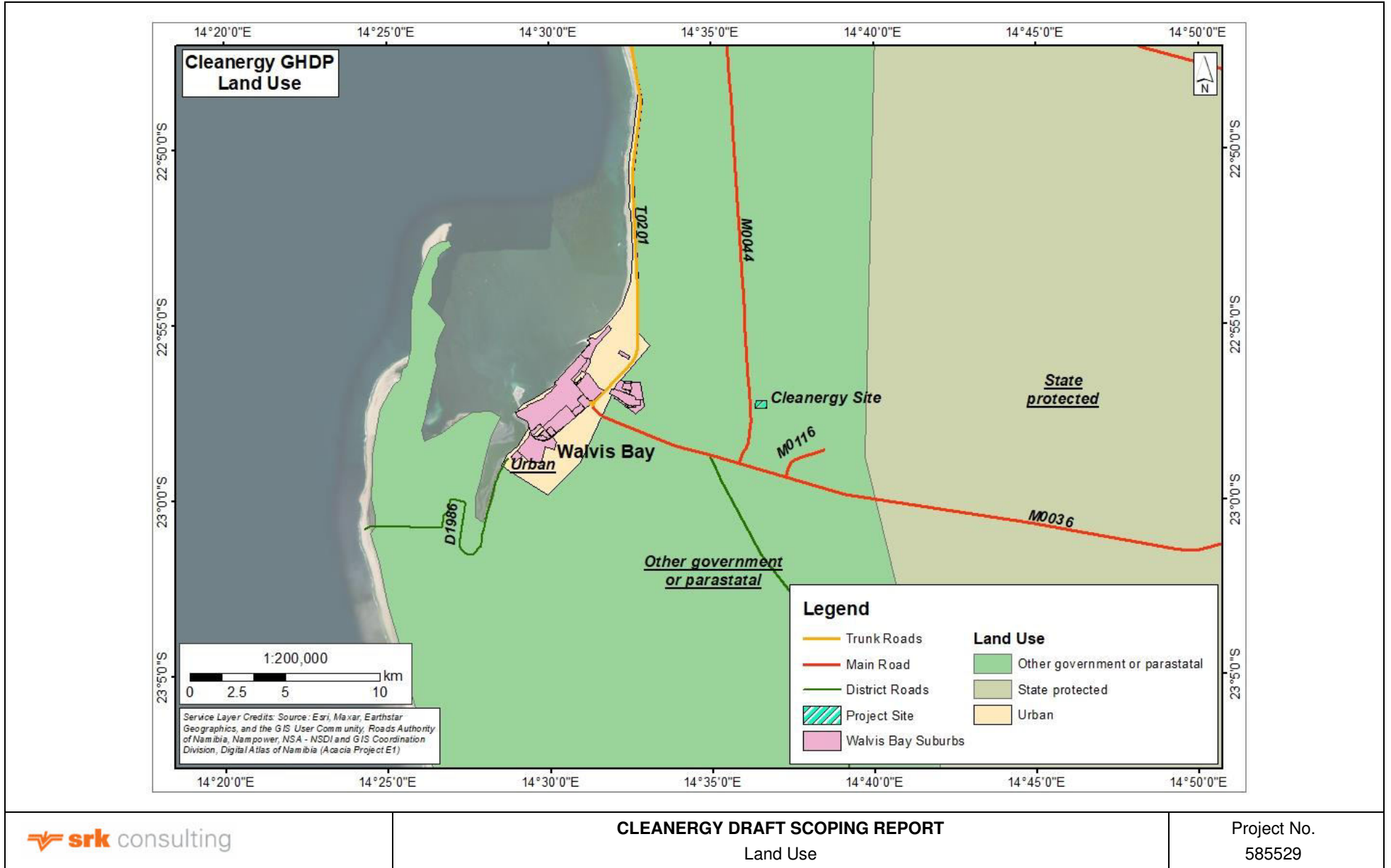


Figure 5-37: Land Use

5.10.2 Other Notable Land Uses

Other land uses undertaken in the region which contribute to the environmental baseline include:

- **Salt production** - Namibia is the largest salt producer in sub-Saharan Africa. Walvis Bay Salt Holdings (Pty) Ltd, through its various subsidiaries, is the largest producer of solar evaporated sea salt in sub-Saharan Africa. The Walvis Bay Salt Refiners site is located in the Kuiseb river delta at the southern end of the Walvis Bay lagoon which is a Ramsar site;
- **Mariculture** - A Strategic Environmental Assessment developed for the Erongo Region, indicated that suitable locations for sea-based and land-based aquaculture were limited and would primarily be associated with Walvis Bay and Swakopmund (SLR, 2022). Two plots between Walvis Bay and Swakopmund have been specifically zoned for land-based aquaculture developments; and
- **Ecotourism** - The old West Coast Recreation Area, now part of the newly proclaimed Dorob National Park, is renowned for its excellent angling. As a tourist, one of the most unique and interesting aspects of Walvis Bay is the huge natural lagoon. This always has numerous seabirds on and around it. Over 100,000 birds were counted on the lagoon, the most noticeable being the flamingos and pelicans (SLR, 2022). These are joined annually by another 200,000 migratory birds, making this an excellent place for keen birdwatchers. It is an ideal place from which to enjoy a guided trip to Sandwich Harbour, a freshwater lake surrounded by dunes 40 kilometres south of the town. It is also very convenient for kayak trips to Pelican Point and the adventurous can go and climb Dune 7, just outside town. In town, attractions include the local museum, birdlife information centre and several restaurants and cafés.

5.10.3 Planned Future Land Uses

The proposed project area is located within an area zoned as Heavy Industrial Area. Currently, it is unknown which other developments will occur in close proximity to the project area as many developers have come forward with proposed projects but none has materialised to date.

5.10.4 Infrastructure

Walvis Bay is linked to Swakopmund and the national road network via the B2 main road. The new dual carriageway behind the dunes, MR44, has been upgraded to enable heavy trucks to access the Port of Walvis Bay, without driving through Swakopmund. Within the town, suburbs are split up by large road infrastructure (SLR, 2022).

A railway links the hinterland, Swakopmund and Walvis Bay, although it is not largely used by industry, which prefers road transport.

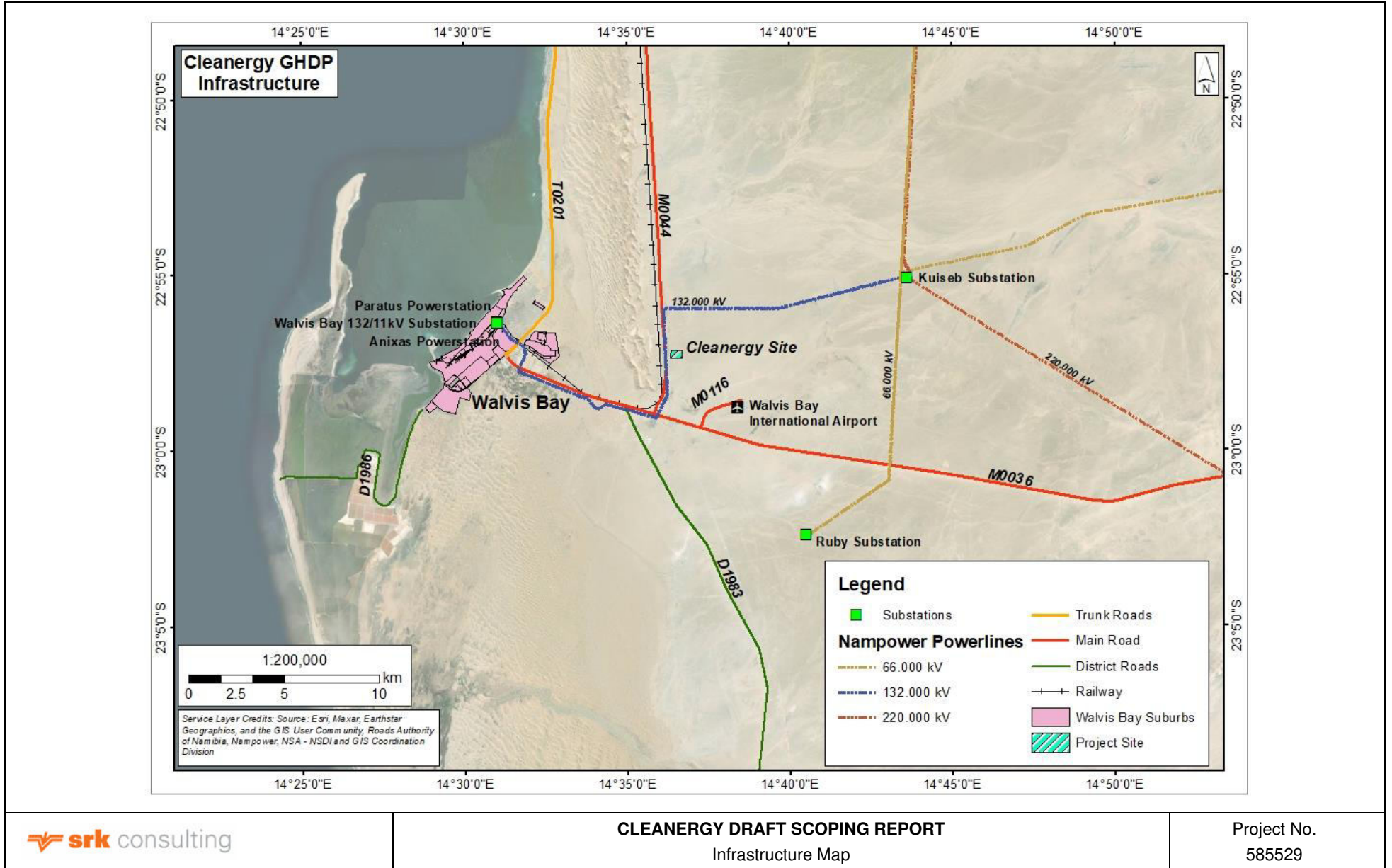


Figure 5-38: Infrastructure Map

5.11 Geography

The Erongo Region in which Walvis Bay is situated makes up 7.7% of Namibia's total area. This region is surrounded by the Kunene in the north, Otjozondjupa in the northeast, the Khomas in the southeast, and the Hardap in the south. The Erongo Region reached westwards from the Central Plateau across the Escarpment and Central-Western Plains to the Central Namibian coast. The distance covered is between 200 km and 350 km. It also stretches from the Ugab River in the north to the Kuiseb River in the south, covering approximately 300 km. The Atlantic Ocean is situated on its western side (Erongo Regional Council, 2015).

The Kuiseb River, ending close to the proposed project site divides the dunes in the south and the gravel plains in the north. This river disappears into the sand in the Kuiseb Delta and does not reach the sea. Walvis Bay then extracts underground water where the river ends. The Erongo Region was named after the Erongo Mountains which consists of an eroded relic of a volcano. This mountain dominates the flat plains in the west, flanked by the Namib Desert in the west and woodland savannah in the east (Erongo Regional Council, 2015).

5.12 Geology

The geology in Walvis Bay is made up of Swakop lithologies consisting of schist with Matchless Amphibolite. The Namibian supergroup is present dating between 1 000 to 542 million years ago and forms part of the Proterozoic Damara Orogen Belt (Intercontinental Belt) and the Coastal Branch (Ministry of Mines and Energy, 2011).

The dominant geology in the general Cleanergy GHDP Project area is associated with the Kalahari and Namib Sands (Kalahari Group) – i.e., relatively young at 0-70 million years. Mineral deposits in the area include uranium (Mendelsohn, et al., 2002). Figure 5-39 provides the underlying geology of the study site and the geology of the surrounding area.

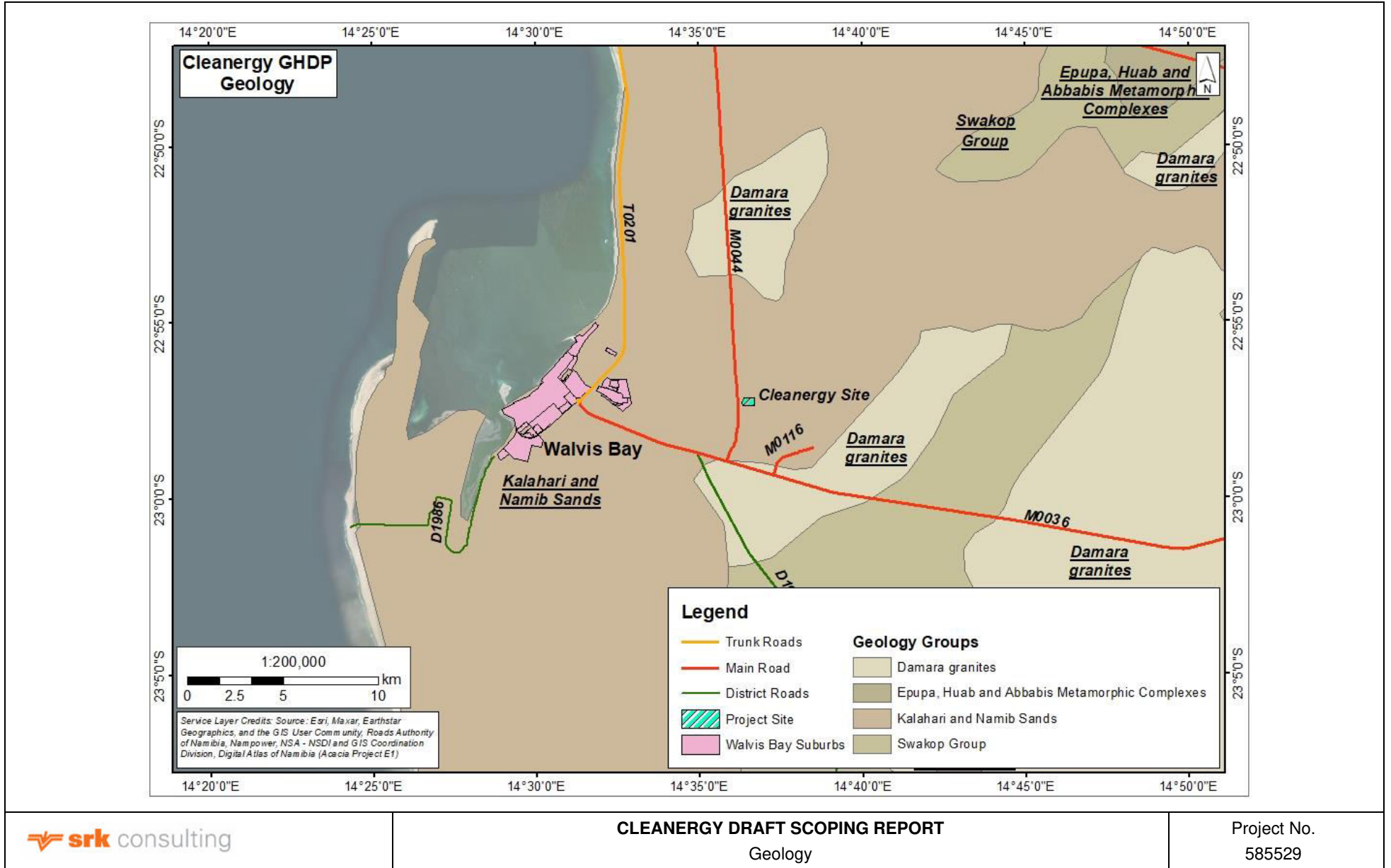


Figure 5-39: Geology

5.13 Air Quality

In general, the air quality in Walvis Bay is of good quality according to the Air Quality Index (AQI) and its main pollutant, PM_{2.5} concentration meets the World Health Organisation (WHO) annual air quality guideline value of 2.1 µg/m³. Surrounding areas in the proposed project area include roads and an airport which adds to the reduction of air quality, however, there are few other developments in the nearby area.

The proposed Cleanergy GHDP Project may potentially result in nuisance dust during the construction phase of the project. The impacts of these emissions are expected to be low on the surrounding areas due to the status quo in the area. Provision has been made for the practical impacts of the proposed Cleanergy GHDP Project to be assessed during the EIA phase of the project but since the impact is expected to be limited, no specific air specialist study is envisaged.

5.14 Noise

Current sources of noise on the surrounding area include highways and the Walvis Bay International Airport. The construction and operation of the proposed Cleanergy GHDP is not expected to generate material noise nuisance. Provision is made for the practical impacts of the proposed project to be further considered during the impact assessment phase of the EIA, although, since the impact is expected to be limited, no specific noise specialist study is envisaged.

5.15 Areas of Conservation Concern

As mentioned previously, the proposed development area falls adjacent the recently proclaimed Dorob National Park Figure 5-40. No communal and freehold conservancies are located in the general area with the closest communal conservancy being the Gaingu Conservancy in the Spitzkoppe area approximately 100 km to the northeast (Cunningham, 2022).

As mentioned previously, an eroded granite riverbank, which forms part of the of the ephemeral Tumas River drainage lines, on the eastern side of the GHDP area is viewed as the most important habitat in the general GHDP area. It serves as habitat to a variety of vertebrate fauna – e.g., near threatened brown hyena (*Parahyaena (Hyaena) brunnea*) resting site (Figure 5-11) and the diurnal and endemic Namib day gecko (*Phelsuma [Rhoptropus] afer*). Although this habitat is not exclusively associated with the GHDP area, nor particularly unique, it nevertheless is viewed as the most important habitat in the general proposed GHDP area.

A well vegetated hummock system in one of the ephemeral Tumas River drainage lines further to the north of the GHDP area. Such a well-developed hummock system is viewed as unique and can be compared to the sparsely vegetated drainage line in the GHDP area (Figure 5-13).

An example of a dolerite ridge, further to the north of the GHDP area, is viewed as unique habitat to a variety of flora and vertebrate fauna (Figure 5-14).

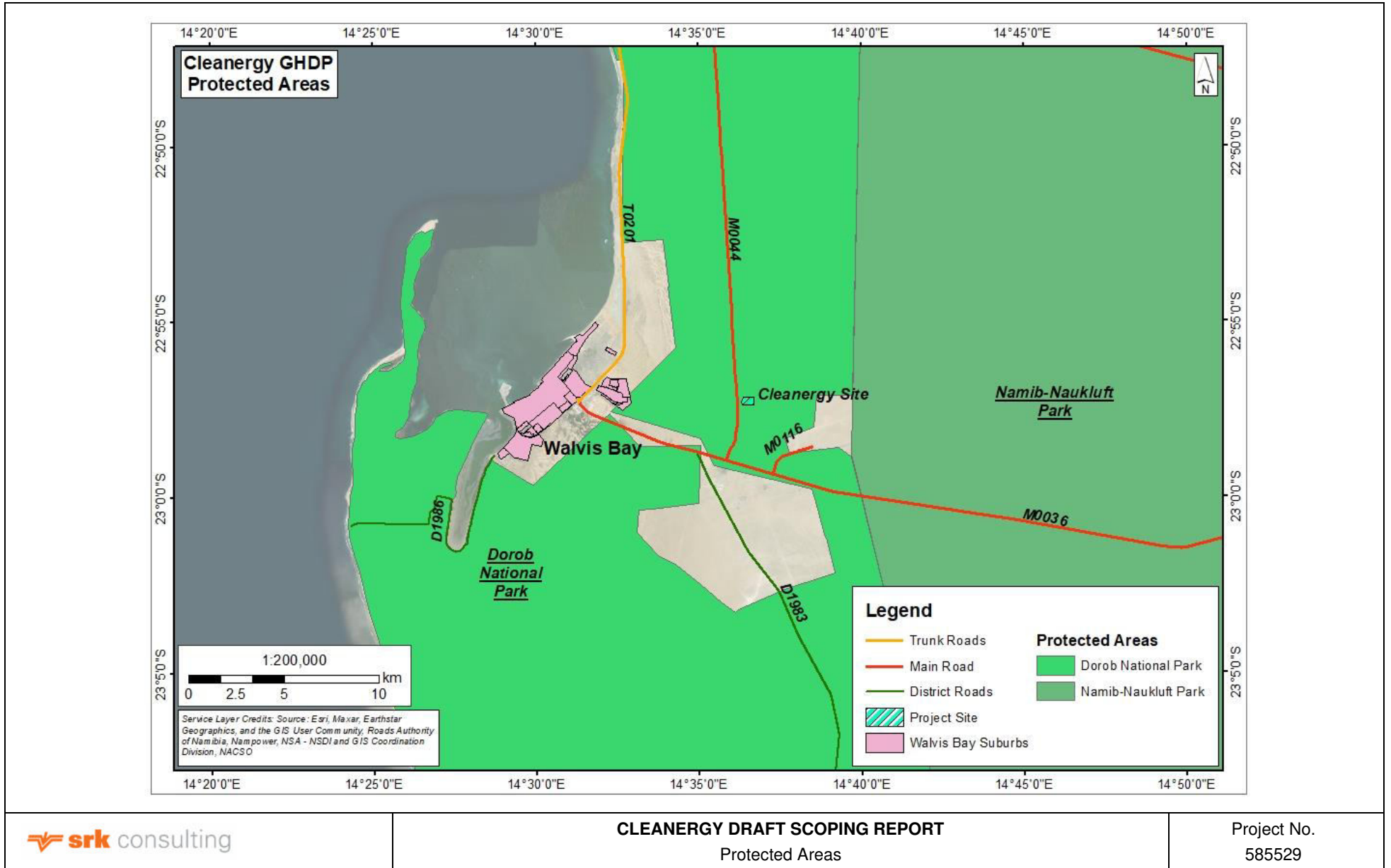


Figure 5-40: Protected Areas

6 Alternatives

During the Scoping Phase, based on professional judgement of the EAP, the engineering design consultants and I&AP comments, different alternatives have been considered for the proposed GHDP Project. The aim of Section 6 is to detail and compare the environmental and social impacts and risks of the project alternatives for the purpose of selecting preferred alternative(s). Section 6 has compiled in compliance with Section 8(g) of the EIA Regulations.

The project components for which alternatives were considered included and are described in the following sections:

- Site;
- Type of renewable energy to be utilised;
- Source of water used for hydrogen production; and
- Technology to be utilised for hydrogen production process.

6.1 Site Alternatives

Both the demonstration and PV plant will be located on one site. Two potential sites were considered. One in Walvis Bay and the other in Arandis. It was agreed that the plant should be located in an area that:

- Was already zoned as an industrial area;
- Is approximately 15 km from the Walvis Bay port;
- Is sufficiently sized for all the infrastructure;
- Will not disturb other economic activities;
- Is close to towns with sufficient accommodation for additional personnel;
- Has adequate access to service providers for services and maintenance;
- Has easy access from the D1984 highway; and
- Has access to all major transport corridors.

The site at Arandis was discarded. The decision approach considered superior transportation accessibility and connectivity as well as plans to establish a new economic zone which outweighed Arandis' favourable solar irradiation conditions.

6.2 Technical Alternatives

6.2.1 Hydrogen Production

Options weighed for the type of hydrogen production method included:

- **Grey hydrogen** which is based natural gasses mainly methane (CH₄) emitting a carbon content (CO₂) to the atmosphere. The plant configuration was, however, too extensive, and complex.
- **Blue hydrogen** which is similar to grey hydrogen, but CO₂ is rather captured or separated and sent to long term storage or used as a raw material in the chemical industry instead of being released to the atmosphere. Storage possibilities or the chemical usage thereof were, however, limited.

- **Orange hydrogen** which is based on biogas through the fermentation of biomass to incineration and gasification, however its carbon content is very high.
- **Green hydrogen** which is based on renewable energy and water transforming water into oxygen and hydrogen done through water electrolysis. This was the preferred option because of the abundance of renewable energy in the form of solar energy and because the process of converting water into oxygen and hydrogen is relatively well established.

6.2.2 Water Provisioning

Because clean water of good quality is required for the green hydrogen production process, the following two options were considered:

- **Desalination** using thermal or membrane processes, usually reverse osmosis to treat seawater to be of suitable quality that can be used in the hydrolysis process. The largest desalination plant in Namibia is the Orano Plant, 35km north of Swakopmund and selling water to NamWater and the mining industry.
- Because the demand of water for the proposed project is less than 14 m³/d, it can easily and effectively be supplied by the municipality which already provide water of potable quality. The preferred option was thus to obtain **water from the municipality**.

6.2.3 Water Electrolysis

Technologies that were considered for water electrolysis were:

- Alkaline electrolysis (TRL 8-9);
- Proton exchange membrane or polymer electrolyte membrane (TRL 8);
- Solid oxide electrolysis cell/high temperature electrolysis (TRL 6); and
- Anion exchange membrane (TRL 6).

Even though TRL 6 processes can bring distinctive improvements more easily, only TRL 8 and 9 were considered for the proposed project.

Between the alkaline electrolysis and proton exchange membrane, the proton exchange membrane process was chosen because of its reduced capacity, the lower importance of the pilot plant purpose, intrinsic hydrogen purity, and elimination of a compression stage.

6.2.4 Utilisation of Hydrogen

Options considered for the usage of elementary hydrogen included:

- **Compressed hydrogen** which was only feasible for clients in Namibia or neighbouring countries as it cannot be shipped over long distances. A medium-term possibility is to use dual-fuel engines for short-sea shipping and trucks at a pressure level of 350 bar.
- **Liquified hydrogen** which can be transported over long distanced, but the material requirements and heat duty are more demanding.
- **Liquid Organic Hydrogen Carriers (LOHC)** which absorbs and releases hydrogen chemically allowing safe storage and transport, but proven LOHC capacities have not reached their sizes yet, making it less likely for usage.

Options considered for the usage of a carbon-containing product included methane, methanol, and synthetic fuels. Sufficient CO₂ and CO quantities required in these usages can, however, not be obtained in Namibia and was ruled out.

Options considered for the usage of ammonia which is the only economical way to bind nitrogen in the atmosphere chemically, producing either grey ammonia from natural gas or green ammonia from solar irradiation. Both of these options were feasible, but for the purposes of the proposed demonstration plant the compressed hydrogen option is the most technically feasible. For this option, the demonstration plant will use only compressed hydrogen tanks.

6.3 No-Go Option

The “no-go” option is the alternative of foregoing the implementation of the project entirely. If the project does not proceed, it will imply that no negative environmental impacts will materialise at the proposed footprint area. However, the overall environmental benefit of using green hydrogen as an energy source will be lost. When compared to current energy sources used, zero polluting emissions is a major advantage associated with the use of green hydrogen.

Further, the socio-economic benefits associated with green hydrogen will also be lost. None of the environmental and social risks identified in Section 7, are considered to be fatally flawed.

7 Anticipated Environmental, Social, and Cultural Impacts

The Scoping Phase aims to identify the potential positive and negative biophysical, socio-economic, and cultural impacts that the proposed project. Anticipated impacts that have been identified by the project team are summarised in Table 7-1.

All impacts in terms of Construction, Operation, and Decommissioning together with the recommended mitigation measures will be and addressed in the Impact Assessment Phase of the project. The discussions also conclude as to which of the potential impacts do not require to be investigated further in the Impact Assessment Phase.

Table 7-1: Summary of Potential Environmental Impacts Associated with the Proposed Development

Element of Environment	Key Issue	Driver	Infrastructure Component	Conclusion
Socio-Economic	<p>Positive (+):</p> <ul style="list-style-type: none"> Potential positive impact on livelihoods/increase in temporary employment opportunities during the <i>Construction Phase</i>; Positive Socio-Economic Impact as a result of skills development in the Green Energy Field (<i>Operational Phase</i>); The positive impact resulting from the <i>Construction and Operation</i> of the proposed Cleanergy GHDP relates to the hydrogen production experience gained within Namibia, the demonstration of the potential successful commercialisation of hydrogen within Namibia and the training of local employees with the conversion of renewable electricity energy into green molecules like hydrogen and the successful demonstration; and <i>Construction and the Operation</i> of the Cleanergy GHDP will not only provide employment opportunities but the sale of hydrogen will also contribute to the Namibian economy (albeit small as this is only a demonstration plant). Considerable economic investment will also be made during the design and construction phases of the project. 	Job creation; Skills development.	Not applicable	Undertake a Socio-Economic Impact Assessment during the Construction Phase of the Project. The scope of work is detailed in Section 8.4.2.
	<p>Negative (-):</p> <ul style="list-style-type: none"> Potential negative impact on Sense of Place due to the permanent alteration of the current landscape (<i>Operational Phase</i>). 	Operational Phase activities and above surface infrastructure development including linear infrastructure i.e., water pipeline, PV panels and other infrastructure causing visual disturbance to road users, including tourists travelling between the coast and Windhoek.	Operational Phase activities and above surface infrastructure including pipeline, PV panels and other infrastructure.	Visual Impact Assessment will be commissioned to assess the potential impacts. The scope of work is detailed in Section 8.4.2.

Element of Environment	Key Issue	Driver	Infrastructure Component	Conclusion
	<p>Negative (-):</p> <ul style="list-style-type: none"> Influx of job seekers during the <i>Construction Phase</i>, may have a negative social impact as a result of increased social pathologies and increase petty crimes due to potential squatting; and Health and safety risks may arise during especially the <i>Construction Phase</i>, as a result of workers lighting fires on site, littering and lack of housekeeping. 	Available job opportunities; Unsafe practices; and Inappropriate waste management practices.	Not applicable	Undertake a Socio-Economic Impact Assessment during the Construction Phase of the Project. The scope of work is detailed in Section 8.4.2.
Air Quality	<p>Negative (-):</p> <ul style="list-style-type: none"> Potential deterioration of air quality due to the generation and dispersion of dust caused by activities undertaken during the <i>Construction Phase</i> of the project. 	Construction phase activities associated with the GHDP and associated infrastructure.	Construction phase activities associated with the GHDP and associated infrastructure.	Air quality is not seen as an impact which cannot be managed with appropriate dust mitigation measures which will be included in the EMP. Air quality therefore does not require further consideration.
Noise	<p>Negative (-):</p> <ul style="list-style-type: none"> Potential increase in ambient noise levels (in the immediate vicinity of the project) during the <i>Construction Phase</i>, as a result of vehicles and machinery. 	Construction phase activities associated with the GHDP and associated infrastructure.	Construction phase activities associated with the GHDP and associated infrastructure.	As the proposed GHDP will be located within an area zoned as heavy industrial, the area is already disturbed by other activities and there are no sensitive receptors on site, it is not foreseen that a Noise Impact Assessment will be required. Impacts can be managed through mitigation measures which will be included in the EMP.
Heritage Resources	<p>Negative (-):</p> <ul style="list-style-type: none"> Potential destruction or loss of cultural artefacts and/or sites of archaeological importance as a result of the <i>Construction Phase</i> of the project. 	Construction phase activities associated with the GHDP and associated infrastructure.	Construction of all infrastructure associated with the GHDP.	A Heritage Impact Assessment will be commissioned to assess the potential impact of the project on heritage resources. The scope of work is detailed in Section 8.4.2.

Element of Environment	Key Issue	Driver	Infrastructure Component	Conclusion
Visual/Landscape	<p>Negative (-):</p> <ul style="list-style-type: none"> Indirect visual impact due to dust generation as a result of the movement of vehicles and materials, to and from the site area during the <i>Construction Phase</i> of the project; Potential deterioration of the visual quality and sense of place of the site during the <i>Construction</i> and <i>Operational Phases</i> of the proposed GHDP, specifically as a result of the solar arrays; and Glint and glare from the solar array during the <i>Operational Phase</i> of the project may further impact on aeronautical, particularly flights on approach and departure from the Walvis Bay Airport. 	Construction phase activities and above surface infrastructure development including linear infrastructure i.e., water pipeline, PV panels and other infrastructure causing visual disturbance to road users, including tourists travelling between the coast and Windhoek.	Construction phase activities and above surface infrastructure including pipeline, PV panels and other infrastructure.	Visual Impact Assessment will be commissioned to assess the potential impacts. The scope of work is detailed in Section 8.4.2.
Biodiversity – Fauna and Flora	<p>Negative (-):</p> <ul style="list-style-type: none"> Physical terrestrial habitat disturbance, alteration and loss of vertebrate fauna and flora habitat during the <i>Construction Phase</i> of the project; Restriction of animal movement and entrapment during the <i>Operational Phase</i> of the project including: <ul style="list-style-type: none"> Disruption of brown hyena movement patterns; Pipeline trench act as pitfall trap; and Aboveground pipeline acting as a barrier to ungulates and ostrich; Establishment and spread of alien invasive plants during the <i>Construction</i> and <i>Operational Phases</i> of the project; and Solar plant potentially disrupting avifauna during the <i>Operational Phase</i> of the project. 	Activities and footprints associated with all infrastructure during Construction and Operational Phases.	Construction and Operation of all infrastructure associated with the GHDP.	A Biodiversity Impact Assessment will be undertaken to determine the potential impact on biodiversity as well as to develop site specific management measures. The scope of work is detailed in Section 8.4.2.

Element of Environment	Key Issue	Driver	Infrastructure Component	Conclusion
Surface water	<p>Negative (-):</p> <ul style="list-style-type: none"> The physical disturbance and destruction of dry and ephemeral water courses and drainage lines during the <i>Construction Phase</i> of the project; and Possible deterioration of water resources as result of accidental spillages of hazardous substances from construction vehicles/machinery, as well as from hazardous materials storage areas during the <i>Construction Phase</i> of the project. 	<p>Activities and footprints associated with all permanent and temporary infrastructure during Construction;</p> <p>Waste and waste water management;</p> <p>Hazardous materials handling.</p>	Solar PV plant and Hydrogen Plant, conservancy tanks, hazardous material storage areas, hydrogen refuelling station etc.	A Surface water Impact Assessment will be undertaken to determine the potential impact on surface water and to develop site specific management measures to protect the surface water resources. The scope of work is detailed in Section 8.4.2.
Groundwater	<p>Negative (-):</p> <ul style="list-style-type: none"> Possible deterioration of groundwater as a result of accidental spillages of hazardous substances from construction vehicles/machinery, as well as from hazardous materials storage areas during the <i>Construction Phase</i> of the project; and Changes to geohydrological regime as a result of the <i>Construction and Operational Phases</i> of the project. 	<p>Activities and footprints associated with all permanent and temporary infrastructure during Construction;</p> <p>Waste and waste water management;</p> <p>Hazardous materials handling.</p>	Solar PV plant and Hydrogen Plant, conservancy tanks, hazardous material storage areas, hydrogen refuelling station etc.	A Groundwater Impact Assessment will be undertaken to determine the potential impact on groundwater and to develop site specific management measures to protect the groundwater resources. The scope of work is detailed in Section 8.4.2.
Soils	<p>Negative (-):</p> <ul style="list-style-type: none"> Physical damage and destruction of soil crusts and soil horizons during the <i>Construction Phase</i> of the project; and Possible deterioration of soils as a result of accidental spillages of hazardous substances from construction vehicles/machinery, as well as from hazardous materials storage areas during the <i>Construction Phase</i> of the project. 	Hazardous materials and waste handling and storage.	Solar PV plant, GHDP infrastructure, hydrogen refuelling station, waste and hazardous storage facilities.	Issues and impacts relating to soil will be considered as part of the Terrestrial Impact Assessment, the Groundwater Impact Assessment and Waste Management.

Element of Environment	Key Issue	Driver	Infrastructure Component	Conclusion
Climate Change	<p>Negative (-):</p> <ul style="list-style-type: none"> During the <i>Construction Phase</i>, the movement of vehicles and earth moving machinery may result in the production of carbon dioxide (Green House Gas), which may have an impact on the climate in the area. <p>Positive (+):</p> <ul style="list-style-type: none"> Positive climate change adaption as a result of the development of green hydrogen projects during the <i>Operational Phase</i> of the project. 	<p>Tail pipe emissions from construction vehicles and equipment.</p> <p>For the Operational Phase, power generation is mostly limited to renewable sources and the Green House Gas emissions will be negligible.</p> <p>Electricity sourced from ErongoRed to drive night-time operations.</p>	<p>Construction vehicles and equipment.</p> <p>ErongoRed emergency power use.</p>	<p>Green House Gas emissions during Construction and Operational Phases are unlikely to have a noticeable negative impact on climate change. The Construction Phase will also be relatively short. For the Operational Phase, power generation is mostly limited to renewable sources and the Green House Gas emissions will be negligible. As green energy will mostly be used and produced on site, the project will ultimately have a positive impact on Climate Change. For the purpose of the demonstration plant it is not anticipated that a Climate Change Study will be required.</p>
Waste storage, handling and disposal	<p>Negative (-):</p> <ul style="list-style-type: none"> Inappropriate storage, handling and disposal of waste during the <i>Construction and Operational Phases</i> of the project may lead to impacts on surface water, groundwater and soils; and Inappropriate storage, handling and disposal of waste during the <i>Construction and Operational Phases</i> of the project may attract scavenging animals to the area which poses a safety risk to the Walvis Bay Airport. 	<p>Waste generation and the storage, handling and disposal thereof.</p>	<p>Waste management facilities.</p>	<p>During Construction and Operation Phases of the proposed project, large volumes of both general and hazardous waste will be produced. It is, however, important to consider proper waste management taking into account the project components, area to be developed, and activities to occur. A specialist study is, however, not required, but waste management practices will still be considered, developed, and included in the EMP.</p>

7.1 Cumulative Impacts

Activities undertaken by different industries can result in several complex effects on the natural biophysical and social environment. These impacts are mainly identified as direct and immediate effects on the environment by a single entity affecting a variable of the environment. These direct impacts have the potential to combine and interact with other activities, depending on the surrounding environmental state and land use. These impacts may aggregate or interact with other impacts to cause additional effects, not easily quantified when assessing an individual entity.

The EMA EIA Regulation of 2012 specifically requires that cumulative impacts be assessed. The impact assessment phase will include a description and analysis of the potential cumulative effects of the proposed Cleanergy GHDP, considering the effects of any changes on the:

- Biophysical; and
- Socio-economic conditions.

The following potential preliminary cumulative impacts have been identified based on the project description and past studies:

- Positive Socio-Economic impacts as a result of temporary employment, skills development in the Green Energy Field etc.;
- Clearance of soil crust and soil horizons and potential loss of habitat due to the development of the proposed Cleanergy GHDP Project;
- Soil erosion due to cleared areas within an area already previously disturbed;
- Emissions due to construction and operational equipment and machinery, adding to overall ambient air quality impact;
- Increased influx of job seekers to the general area as a result of the construction activities of the Cleanergy GHDP Project; and
- The construction period may cause traffic-related impacts on the local road network.

The EAP team and specialists will identify significant past and present projects and activities that may interact with the project to produce cumulative impacts during the impact assessment phase of the process. The EAP team and specialists will include mitigation and management measures in the EMP that Cleanergy will be required to implement to, where possible, avoid the negative impact and/or minimise the significance of the impacts.

8 Plan of Study for the Environmental Impact Assessment Phase of the EIA Process

A full EIA process will be conducted for the proposed project, where an EIAR and EMP will be compiled and submitted to the MEFT. A summary of the approach to be followed is provided in Figure 1-1.

This PoS for the EIA is provided to give an indication of further studies and assessments to be undertaken for the project and the impact assessment methodology that will be used to qualify and quantify the identified impacts.

The scoping process is designed to identify impacts and determine if these impacts are sufficiently significant to warrant a specialist investigation in the EIA Phase. Issues requiring further investigation require a common set of assessment criteria against which the impacts can be described, evaluated, and the significance determined.

8.1 Purpose of this Plan of Study

The purpose of the Scoping Phase of this EIA process is to identify potential environmental impacts, and to discuss the alternatives considered. This PoS outlines the process to be followed during the course of the EIA and is submitted to the MEFT for review and comment as part of the Draft Scoping Report. The Draft Scoping Report, with the PoS was also made available to all the stakeholders for review and comment. Comments received were incorporated into the Final Scoping Report and PoS, which is submitted to the MEFT for approval.

The purpose of the PoS is to lay out an effective methodology to be followed during the assessment of impacts, should this be deemed necessary, in order to meet the requirements of the EMA.

8.2 Purpose of the Environmental Impact Assessment and Environmental Management Plan

The objectives of the EIA/EMP will be to:

- Review and update I&AP Database;
- Ensure ongoing consultation with I&APs;
- Identify and assess the environmental (biophysical, socio-economic, and cultural) impacts of the construction, operation, decommissioning and post closure impacts of the proposed project. The cumulative impacts of the proposed development will also be identified and evaluated;
- Identify and evaluate potential management and mitigation measures that will reduce the negative impacts of the proposed development and enhance the positive impacts;
- Manage specialist activities and review specialist study reports;
- Assess environmental impacts;
- Compile monitoring, management, mitigation, and training needs in the EMP;
- Compile EIAR and EMP; and
- Provide the decision-making authorities with sufficient and accurate information in order to make a sound decision on the proposed development.

8.3 Planned Task Description for the Environmental Impact Assessment Process

Table 8-1 summarises the key tasks and provide indicative timeframes for the EIA Phase of the proposed Cleanergy GHDP Project.

Table 8-1: Key Environmental Assessment Practitioner Tasks and Indicative Time Frames associated with the Environmental Impact Assessment Phase

Task Number	Activity	Indicative Timeframe	I&AP Participation Opportunities
1	<u>Ensuring On-going Public Participation:</u> <ul style="list-style-type: none"> Review, update and maintain Stakeholder Database (Appendix C_1); Provide opportunities to I&APs and other Stakeholders to participate in the process; Provide responses to concerns raised by I&APs and other Stakeholders. 	Throughout EIA process	Opportunities provided throughout process to submit comments to SRK
2	<u>Specialist Study Management and Quality Assurance:</u> <ul style="list-style-type: none"> Compile and issue project specific Scope of Work (specialist methodology) to specialist; Manage specialist activities in line with Scope of Work issued (Please refer to Section 8.4.2); Receive project specific specialist inputs for incorporation into EIAR and EMP; Review of specialist study reports and other inputs received. 	Three Months (August – October 2022)	Final Specialist Reports issued as part of Draft EIAR/EMP for I&AP/Stakeholder comment
3	<u>Assessment of Identified Environmental Impacts and Develop Management/Mitigation measures:</u> <ul style="list-style-type: none"> Assess Environmental Impacts identified in accordance with the SRK Impact Assessment Methodology (Section 8.5); Develop project specific practical management/mitigation measures to address identified Environmental Impacts; Compilation of EIAR and EMP. 	Two Months (September – October 2022)	Draft EIAR/EMP for I&AP/Stakeholder comment
4	<u>Draft EIAR/EMP release for Public Comment:</u> <ul style="list-style-type: none"> Notification to Registered I&APs/Stakeholders of availability of Draft EIAR/EMP for a 14-day commenting period; Electronic distribution of Draft EIAR/EMP including CRR and Specialist Reports on request; Making Draft EIAR/EMP including CRR and Specialist Reports available on selected internet sites; Making Hard copies of the Draft EIAR/EMP including CRR and Specialist Reports available at selected sites; Distributing of hard copies of the Draft EIAR/EMP including CRR and Specialist Reports to Competent Authority (MEFT) and selected Commenting Authorities; Arrange/Facilitate public meeting and focus group meetings, as and if required. 	One Month (October 2022)	Draft EIAR/EMP for I&AP/Stakeholder comment
4	<u>Compilation of Final EIAR/EMP:</u> <ul style="list-style-type: none"> Assimilation of comments received; Preparation of feedback in response to comments received; 	Two weeks	Not Applicable

Task Number	Activity	Indicative Timeframe	I&AP Participation Opportunities
	<ul style="list-style-type: none"> Updating and finalisation of EIAR/EMP (including updated CRR). 		
5	<u>Final EIAR/EMP:</u> <ul style="list-style-type: none"> Submit Final EIAR/EMP to MEFT for decision making; Follow up on final decision by MEFT. 		Not Applicable

8.4 Specialist Study Terms of Reference

The following site-specific specialist studies will be conducted during the impact assessment phase to address the key issues (Section 7) requiring further investigation and management:

- Biodiversity Impact Assessment;
- Heritage and Archaeology Impact Assessment;
- Visual Impact Assessment;
- Surface Water and Geohydrological Impact Assessment; and
- Socio-Economic Impact Assessment⁶.

Table 8-2 summaries the Specialist Studies and relevant project components requiring assessment.

Table 8-2: Summary of Specialist Studies and Relevant Project Components

No	Specialist Study	Relevant Project Components
1	Biodiversity Impact Assessment	All infrastructure components: <ul style="list-style-type: none"> • GHDP; • Solar PV plant; • Water pipeline; and • Access road.
2	Heritage and Archaeology Impact Assessment	All infrastructure components: <ul style="list-style-type: none"> • GHDP; • Solar PV plant; • Water pipeline; and • Access road.
3	Visual Impact Assessment	All infrastructure components: <ul style="list-style-type: none"> • GHDP; • Solar PV plant; • Water pipeline; and • Access road.
4	Surface Water and Geohydrological Impact Assessment	All infrastructure components: <ul style="list-style-type: none"> • GHDP; • Solar PV plant; • Water pipeline; and • Access road.

⁶ It is noted that a Socio-Economic Impact Assessment will be required as part of the EMP Conditions and will need to be undertaken during the Construction Phase of the project to maximise the opportunities associated with the proposed project.

No	Specialist Study	Relevant Project Components
5	Socio-Economic Impact Assessment	All infrastructure components: <ul style="list-style-type: none"> • GHDP; • Solar PV plant; • Water pipeline; and • Access road.

Certain impacts that are anticipated to be of limited or lower significance, either by virtue of the scale of the impacts, their short duration (e.g., construction phase only), disturbed nature of the receiving environment and/or distance to communities, will be assessed by EAP Team and reported directly into the EIAR. These studies include:

- Noise;
- Climate Change; and
- Waste Management.

8.4.1 Generic Terms of Reference for Specialist Studies

SRK has noted that there is a tendency for specialist studies to over-deliver on baseline and under-deliver on impact assessment and mitigation. Noting that the purpose of the studies is not academic, but to inform the Cleanergy GHDP Project study, specialists should devote considerable effort to the impact assessment and recommendations for mitigation.

It is important that specialists bear in mind, both during fieldwork and in subsequent reporting, that the generic ToR and principal objectives for each specialist study are to:

- Describe and map the receiving environment and existing baseline characteristics of the study area and place this in a regional context. Identify and discuss sensitivity, rarity and other relevant aspects of the project site requiring special consideration, taking cognisance of the baseline description;
- Review the Scoping phase Comments and Response Report to ensure that all relevant issues and concerns raised by I&APs, relevant to fields of expertise, are addressed;
- Assess the potential impacts of the proposed project activities and facilities, including any associated cumulative impacts. Assessments and standards use must include both local Namibian Standards as well as the IFC PSs. Where there is more than one standard for a specific aspect, the stricter standard should be adopted. Where no standards exist refer to other relevant internationally appropriate standards;
- Describe the legal, permit, policy and planning requirements including requirements the IFC PSs. Identify areas where issues could combine or interact with issues likely to be covered by other specialists, resulting in aggravated or enhanced impacts;
- Consult and discuss applicable (sectoral) guidelines and policy documents;
- Identify and assess each potential impact of the project and the alternatives (if any are presented to the specialist), including impacts associated with the construction, operation and decommissioning phases, followed by a narrative description of each impact and a presentation of the assessment impact, using SRK's prescribed impact rating methodology;
- Specialists shall use SRK's standard assessment method for impact prediction and assigning significance;
- Indicate the acceptability of the project and/or alternatives;

- Identify alternatives that could avoid or minimise impacts;
- Indicate the reliability of information utilised in the assessment of impacts as well as any constraints to which the assessment is subject (e.g., any limitations and assumptions);
- Identify and describe potential cumulative impacts of the proposed project in relation to proposed and existing activities impacting on the same resource;
- Where necessary consider the precautionary principle in the assessment of impacts;
- Identify management and mitigation actions in order to avoid first, then reduce/minimise, then rectify and then lastly offset potential impacts;
- If applicable, recommend and draft a monitoring measure indicating what, how, when and where monitoring including the relevant standards, where they exist;
- Specialist reports must include all aspects included in the Specialist Report template (Supplied by SRK) to comply with the EIA Regulations.
- Specialists should determine the spatial scope of their assessments using their professional judgment;
- The General ToR may not apply equally to all specialists but are included so as to provide a comprehensive guideline. Specialists should disregard those elements of the ToR which are not applicable to them; and
- Specialist reports to include an Executive Summary.

8.4.2 Specialist Specific Terms of Reference

Terrestrial Biodiversity and Ecology

The proposed scope of work for the Biodiversity & Ecology Impact Assessment are as follows:

- Undertake a desktop screening to identify sensitive and/or data scarce areas within the proposed project site that will require detailed surveys;
- Undertake a detailed ecological survey of the proposed site;
- Describe and map the baseline terrestrial biodiversity and ecology of the proposed project area/sites, emphasising, but not limited to, key habitat and landscape features (e.g. drainage lines and rocky outcrops), soils, watercourses, sensitive and threatened habitats, and species of conservation concern with International Union of Conservation of Nature (IUCN) red list and/or range-restricted status;
- Compile sensitivity maps, at an appropriate scale, of the sites of the various proposed infrastructure components;
- Review and interpret all relevant, available local and international publications, standards, guidelines and other information sources relevant to the biodiversity and ecology issues associated with the proposed infrastructure components;
- Undertake a habitat assessment based on IFC definitions of modified and natural habitat, including high level critical habitat assessment using IFC PS 6 thresholds;
- Identify presence and distribution of alien invasive plant species;
- Record observations of human use of provisioning ecosystem services (e.g., specific indigenous fruit or timber trees);

- Identify and describe all factors resulting from the construction and operation of the proposed infrastructure components that may influence terrestrial environments in the region;
- Identify and describe potential terrestrial biodiversity and ecology impacts and/or opportunities;
- Assess the direct, indirect and cumulative impacts of the proposed development on terrestrial biodiversity and ecology during the different phases of the proposed infrastructure components; and
- Compile an EMP for terrestrial impacts of the proposed infrastructure components.

The terrestrial biodiversity and ecology assessment must be conducted in line with relevant national and/or international standards / guidelines, where available, inter alia, the IFC PS 6.

Heritage including Archaeology, Landscape Setting and Palaeontology

The proposed scope of work for the Heritage Impact Assessment is as follows:

- Undertake a desktop screening to identify sensitive and/or data scarce areas in the proposed project area/sites that will require detailed surveys as well as areas with intensive legacy damage that does not require detailed surveys;
- Undertake detailed heritage surveys of proposed project site;
- Describe and map the baseline heritage (aesthetic, archaeological, architectural, cultural, historical, scientific or social significance) of the proposed project area;
- Compile sensitivity maps (at an appropriate scale) of the proposed project area;
- Review and interpret relevant, available local and international publications, standards, guidelines and other information sources relevant to the issues associated with the proposed infrastructure components;
- Identify and describe all factors resulting from the construction and operation of the proposed project that may influence terrestrial environments in the region;
- Identify and describe potential heritage feature impacts and/or opportunities;
- Assess the direct, indirect and cumulative impacts of the proposed development on heritage during the construction, operational and decommissioning phases of the proposed project;
- Recommend management of impacts, in line with the mitigation hierarchy, and for the approval of the National Heritage Council;
- Make recommendations on permitting required in the event of unavoidable damage/encroachment on heritage sites, and any other requirements in terms of the National Heritage Act, 2004 (Act No. 27 of 2004);
- Recommend actions and measures to monitor impacts; and
- Compile an EMP for terrestrial aspects of the construction / upgrade, operations and maintenance of the proposed infrastructure components. The EMP should contain a protocol for “chance finds” in during construction earthworks.

The heritage assessment will be conducted in line with relevant national and/or international standards/guidelines, where available. This includes, inter alia, the IFC PS8 Cultural Heritage.

Visual

The proposed scope of work for the Visual Impact Assessment (including glint and glare) are as follows:

- Undertake a site visit to document a comprehensive description, characterization and visual sensitivity of the receiving environment. The character and quality of the landscape and the sense of place shall be determined and mapped;
- Quantify the extent of risk to road users and flights approaching and departing from the Walvis Bay International Airport;
- Describe the project components in terms of their physical characteristics and determine potential visual issues;
- Simulate the physical presence and nature of the visual intrusion of the proposed project components (which) from critical viewing areas. Determine visibility and visible exposure by conducting a viewshed analysis;
- Compile a visual impact assessment based on the simulation results and assess the potential impacts of the proposed project components on the visual environment;
- Identify practicable mitigation measures to reduce negative impacts on sensitive receptors and indicate how these can be incorporated into the design, construction and management of the proposed project; and
- Compile an EMP for visual impacts of the proposed infrastructure components.

The visual assessment will be conducted in line with relevant national and/or international standards/guidelines, where available.

Surface Water and Geohydrology

The proposed scope of work for the Surface and Groundwater Impact Assessment are as follows:

- Undertake a desktop screening to identify sensitive surface and groundwater features (i.e. drainage lines, aquifers and rivers) within the extent of the project Area of Influence;
- Undertake detailed surface water / hydrological surveys and groundwater hydro census of the sites proposed for the proposed GHDP;
- Describe and map the baseline surface water and geohydrological features relating to the abovementioned activities;
- Assess the direct, indirect and cumulative impacts of the proposed development on surface hydrology and geohydrology during the construction, operational and decommissioning phases of the proposed infrastructure components;
- Recommend management of impacts, in line with the mitigation hierarchy, to:
 - Anticipate and avoid risks and impacts associated with the above assessment findings, and the consideration of potential surface and groundwater polluting activities; and
 - Develop management recommendations;
- Recommend actions and measures to monitor impacts;
- Compile an EMP for geohydrology aspects relating to proposed infrastructure components.

Socio-Economic

One of the key concerns raised during the public participation and stakeholder engagement, was the possible impact of this project on the socio-economic environment. It was noted that past projects promised a lot but delivered little and care must therefore be taken to ensure that the project provides benefits to the community. In line with this a consultant was identified, to assist the proponent with ensuring that the impacts of, especially the construction phase, can be adequately managed. Due to the importance placed on this item by the proponent, it was decided to allow the consultant to define the baseline of the socio-economic component outside the formal EIA process and then to proactively work with the proponent and contractors to developed sensible mitigation controls prior to the start of construction. Therefore, the socio-economic study will not be part of the formal EIA process but will be executed as part of the EMP in order to make it more proactive.

The proposed scope of work for the Socio-Economic Impact Assessment is as follows:

- Establish a socio-economic baseline of communities located within the pre-agreed area of influence. The baseline will be prepared using secondary data and supplemented by primary data – including quantitative and qualitative surveys of communities and households that are (1) directly affected by the project, (2) indirectly affected by the project, as well as (3) vulnerable or special interest groups (indigenous people (if any)) located in these communities;
- An extensive literature review will be conducted focusing on the socio-economic status of the Walvis Bay and the region as a whole. Some of the key primary data collection sources will include the Population and Housing Census (2011, 2001 and 1991), Household Income and Expenditure Surveys, Demographic and Health Surveys, Education Management Information Systems, Regional Poverty Assessments, regional development plans, sectoral policies, strategies and plans, and research documents amongst others;
- Undertake desktop mapping to define key physical social features (households, farms, water points, cemeteries etc.). The desktop mapping will cover all directly and indirectly affected communities included in the area of impact;
- Undertake a reconnaissance visit. The main purpose of the reconnaissance visit would be to become familiar with the project area and to refine the Feasibility Study programme and methodology. Key objectives of the reconnaissance visit are to:
 - Gain preliminary insights into socio-economic status of the project area;
 - Collect GPS coordinates of social and economic infrastructure not already available;
 - Gain initial insights into opinions and attitudes toward the hydrogen demonstration plan; and
 - Gain insights that may influence the Social Impact Assessment approach and methodology.
- Primary Data Collection. The overall research approach will be participatory in nature, ensuring that I&APs are provided with ample opportunity to voice their views and opinions regarding the proposed hydrogen demonstration plant. This calls for extensive consultations with Government Departments, Regional and Local Authorities, Non-Governmental Organisations's (NGOs) and other organisations involved in the preservation of the social environment, managers of tourism attraction sites and facilities and the general public.

The research methods for collecting data on socio and economic indicators will primarily be qualitative in nature, while quantitative (statistical) data will be collected via existing literature.

The research methods will entail literature collection and review and high level Key Informant Interviews (KIIs). Representatives from the following organisations will be interviewed:

- Regional Governor;
 - Constituency Councilor;
 - Ministry of Mines and Energy;
 - Ministry of Works and Transport;
 - Ministry of Education, Arts and Culture;
 - Ministry of Health and Social Services;
 - Ministry of Gender Equality, Poverty Eradication and Social Welfare;
 - Ministry of Urban and Rural Development;
 - Ministry of Labour, Industrial Relations and Employment Creation;
 - NamPort;
 - NamCor;
 - Tourism establishment;
 - NGOs who work in the fields of health, social and urban development;
 - Business association; and
 - Other.
- Review all Public Participation records (including issues and comments trails, meeting minutes, written representations) to profile the dominant social issues and concerns raised during the EIA public participation process. The profile will be included as a separate chapter in the SIA report;
 - Analysis and Social Impact Assessment Report and Social Management Plan Preparation. A thematic analysis approach will be used for the Social Impact Assessment Report. The social-economic impacts will focus on the construction period only;
 - Assess the potential direct, indirect and cumulative social-economic impacts and risks linked to the project. The assessment of impacts shall entail but may not be limited to the following:
 - Socio-economic development;
 - Social and cultural change;
 - Impact on household livelihoods as a result of the project and the price of water;
 - Impact on internally displaced communities;
 - Impacts on human rights;
 - Impact on health and safety (including sexually transmitted diseases, health conditions and well-being, occupational health and safety of workers and labour and working conditions);
 - Impact of project traffic;
 - Impact on vulnerable groups;
 - Interface with other specialist to ensure suitable interface between the SIA and biophysical specialist studies. The interface will ensure suitable collaboration in (1) defining a common

study area and social receptors, (2) assessing secondary impacts on local communities related to biophysical primary impacts, (3) assessing ecosystem services, and (4) integration of the ESMP;

- Prepare practical mitigation measures and enhancement measures that will avoid, reduce, or compensate for the identified social impacts associated with the project, while promoting and enhancing social benefits. The impact assessment and mitigation measures will cover all project phases (construction, operations, and decommissioning phase), as well as all associated facilities. The social impact assessment will be conducted in line with relevant national and / or international standards / guidelines, where available. This includes, inter alia, the IFC PS3, IFC PS 4, IFC PS 5.

8.5 Proposed Method for Assessing Environmental and Social Issues and Alternatives

8.5.1 Impact Assessment Methodology

A quantitative impact assessment will be conducted for the project. The method to be used makes use of the basic risk assessment approach of deriving an expression for risk from the product of likelihood (probability) and consequences.

The main objective of the impact assessment is to identify the impacts that can be avoided and/or mitigated and the benefits of the positive impacts during the planning, construction, operation and decommissioning and rehabilitation phases of the proposed project on the receiving environment.

Impact Identification

Specialists will be required to identify impacts (positive and negative) associated with the project, then further specify whether the impact would have a direct/indirect effect. An assessment of the cumulative and residual impacts if any, that may occur because of the proposed project are also evaluated.

Impact Assessment Methodology

The anticipated impacts associated with the proposed project will be assessed according to SRK's standardised impact assessment methodology, which is presented below. This methodology has been utilised for the assessment of environmental impacts where the consequence (extent, intensity, and duration of the impact) and probability of the impact have been considered in parallel to provide an impact rating and hence an interpretation in terms of the level of environmental management required for each impact as follows:

The **significance** of an impact is defined as a combination of the **consequence** of the impact occurring, including possible irreversibility of impacts and/or loss of irreplaceable resources, and the **probability** that the impact will occur.

The criteria used to determine impact consequence are presented in Table 8-3.

Table 8-3: Criteria used to determine the Consequence of the Impact

Rating	Definition of Rating	Score
A. Extent – the area over which the impact will be experienced		
Local	Confined to project or study area or part thereof (e.g. site)	1
Regional	The region, which may be defined in various ways, e.g. cadastral, catchment, topographic	2
(Inter) national	Nationally or beyond	3
B. Intensity – the magnitude of the impact in relation to the sensitivity of the receiving environment, taking into account the degree to which the impact may cause irreplaceable loss of resources		
Low	Site-specific and wider natural and/or social functions and processes are negligibly altered	1
Medium	Site-specific and wider natural and/or social functions and processes continue albeit in a modified way	2
High	Site-specific and wider natural and/or social functions or processes are severely altered and/or irreplaceable resources ⁷ are lost	3
C. Duration – the timeframe over which the impact will be reversed		
Short-term	Up to 2 years	1
Medium-term	2 to 15 years	2
Long-term	More than 15 years or irreversible	3

The combined score of these three criteria corresponds to a **Consequence Rating**, as provided in Table 8-4.

Table 8-4: Method used to determine the Consequence Score

Combined Score (A+B+C)	3 – 4	5	6	7	8 – 9
Consequence Rating	Very low	Low	Medium	High	Very high

Once the consequence is derived, the probability of the impact occurring is considered using the probability classifications presented in Table 8-5.

Table 8-5: Probability Classification

Probability – the likelihood of the impact occurring	
Improbable	< 40% chance of occurring
Possible	40% - 70% chance of occurring
Probable	> 70% - 90% chance of occurring
Definite	> 90% chance of occurring

The overall **significance** of impacts is then determined by considering consequence and probability using the rating system prescribed in Table 8-6.

⁷ Defined as important cultural or biological resource which occur nowhere else, and for which there are no substitutes.

Table 8-6: Impact significance ratings

		Probability			
		Improbable	Possible	Probable	Definite
Consequence	Very Low	INSIGNIFICANT	INSIGNIFICANT	VERY LOW	VERY LOW
	Low	VERY LOW	VERY LOW	LOW	LOW
	Medium	LOW	LOW	MEDIUM	MEDIUM
	High	MEDIUM	MEDIUM	HIGH	HIGH
	Very High	HIGH	HIGH	VERY HIGH	VERY HIGH

Finally the impacts will also be considered in terms of their status (positive or negative impact) and the confidence in the ascribed impact significance rating. The prescribed system for considering impacts status and confidence (in assessment) is laid out in Table 8-7.

Table 8-7: Impact Status and Confidence Classification

Status of impact	
Indication whether the impact is adverse (negative) or beneficial (positive).	+ ve (positive – a 'benefit')
	– ve (negative – a 'cost')
Confidence of assessment	
The degree of confidence in predictions based on available information, SRK's judgment and/or specialist knowledge.	Low
	Medium
	High

SRK recommends that the impact significance rating should be considered by authorities in their decision-making process based on the implications of ratings ascribed below:

- **INSIGNIFICANT:** the potential impact is negligible and **will not** have an influence on the decision regarding the proposed activity/development.
- **VERY LOW:** the potential impact is very small and **should not** have any meaningful influence on the decision regarding the proposed activity/development.
- **LOW:** the potential impact **may not** have any meaningful influence on the decision regarding the proposed activity/development.
- **MEDIUM:** the potential impact **should** influence the decision regarding the proposed activity/development.
- **HIGH:** the potential impact **will** affect the decision regarding the proposed activity/development.
- **VERY HIGH:** The proposed activity should only be approved under special circumstances.

In the report, practicable mitigation and optimisation measures will be recommended and impacts rated in the prescribed way both without and with the assumed effective implementation of essential mitigation and optimisation measures. Mitigation and optimisation measures will be either:

- **Essential:** best practice measures which must be implemented and are non-negotiable; and
- **Best Practice:** recommended to comply with best practice, with adoption dependent on the proponent's risk profile and commitment to adhere to best practice, and which must be shown to have been considered and sound reasons provided by the applicant if not implemented.

8.6 Environmental Impact Assessment Report and Environmental Management Plan

8.6.1 Environmental Impact Assessment Report

Upon acceptance of the Final Scoping Report by the MEFT, a Draft EIA report and EMP will be compiled in terms of Section 56 of GNR 30 promulgated in terms of the EMA. The purpose of the impact assessment phase of this EIA process is to systematically assess the impacts of the proposed project on the immediate and surrounding biophysical and socio environment.

The specialist findings, recommendations and other relevant information will be integrated into the EIAR and EMP. The EAP will review the Specialist Reports and the finalised Specialist Reports will be included in the EIAR.

All comments received on the Draft EIA report will be addressed and taken into consideration prior to submission of the Final EIA report to the MEFT.

8.6.2 Environmental Management Plan

An EMP will also be compiled. This will provide effective management and mitigation measure pertaining to the proposed development relating to the identified environmental impacts. Specialists will be required to develop management and monitoring plans in their respective areas of expertise, which will be incorporated into the EMP. These management and mitigation measures will strive to minimise the negative impacts of the proposed development and enhance the positive impacts.

8.7 Alternatives

According to GNR 30 promulgated in term of the EMA, feasible alternatives need to be considered and assessed during the scoping Phase of the project. During the scoping phase, the project alternatives, including the no-go option have been identified and described in Section 6. All alternatives, including the no-go option will be subject to the impact assessment.

8.8 Public Participation Process Going Forward (Environmental Impact Assessment Phase)

The PPP conducted thus far is provided in Section 2.2.4. The PoS for the proposed development should achieve the following:

- Describe the tasks that will be undertaken as part of the EIA/EMP process, and the process followed in undertaking these tasks;
- Describe the authority consultation process and an indication when consultation will be conducted;
- Provide the assessment methodology used to assess the potential environmental impacts; and
- Provide an overview on the on-going I&AP consultation process.

8.8.1 Submission of Environmental Impact Assessment Report and Environmental Management Plan for Review

Upon acceptance of the Final Scoping Report by the MEFT, a draft EIAR will be compiled in terms of Section 56 of GNR 30 promulgated in terms of the EMA. The purpose of the impact assessment Phase of this EIA process is to systematically assess the impacts of the proposed project on the immediate and surrounding biophysical and socio environment.

The draft EIAR and EMP will be made available for a 14-day commenting period. Registered I&AP's will be notified of the availability of the draft EIR and EMP Report through email. Depending on the responses received during the registration period, and where requested by the stakeholders, a public meeting and/or key stakeholder meetings may be held during the impact assessment phase of the project.

Where necessary, comments and issues raised by I&AP's during the commenting period will be consolidated into the Final EIAR and EMP with the relevant response issued by the EAP. The Final EIAR and EMP will then be submitted to the MEFT for decision making. The comments will also be collated into the CRR that will form an Appendix to the Final EIR.

8.8.2 Authority Consultation

Ongoing consultation with the different authorities will be conducted during the course of the EIA process. Further consultations with the competent authorities will be conducted should they become necessary. Authority consultation is considered an on-going process until a decision is made on the environmental application. Other authorities that will be included is the Walvis Bay municipality and others identified during the scoping phase of the project.

The EIA phase will only commence if the MEFT accept the Scoping Report and the PoS for the EIA.

Copies of the Draft EIAR will be made available to the following key regulatory and commenting authorities:

- The Green Hydrogen Commissioner;
- The MME;
- MAAF;
- Ministry of Defence.
- Ministry of Industrialisation, Trade and SMEs Development;
- Governor of Erongo;
- Namibia Investment Promotion and Development Board (NIPDB);
- Walvis Bay Municipality;
- ErongoRed;
- Ministry of Urban and Rural Development;
- National Heritage Council of Namibia;
- National Botanical Research Institute;
- Ministry of Land Reform;
- Walvis Bay Airport;
- Roads Authority;
- NamPower; and
- NamWater.

All other authorities will be e-mailed the report or a link to where the report can be sourced. Copies of the report will be made available upon request.

The final EIA Report will be submitted to the Ministry of Environment and Tourism for decision making.

For the remainder of the Scoping process and EIA, the interaction with the MEFT will be as follows:

- Submission of the Draft Scoping Report;
- Addressing comments on the Draft Scoping Report;
- Submission of the Final Scoping Report;
- Submission of the Draft EIA Report and EMP;
- Addressing comments on the EIA Report and EMP;
- Submission of the Final EIA Report and EMP; and
- Obtaining an ECC from the Ministry of Environment and Tourism.

8.8.3 Consultation Post Decision

Once decisions on the ECC application have been made, the EAP team will inform the I&APs of the decision through emails and notification letters. The notification will include information on the appeal process that the I&APs may go through should they wish the MEFT decisions to change.

8.9 Grievance Mechanism

A detailed Grievance Mechanism will be developed which will be used for the remainder of the EIA process into the Construction and Operational Phases of the Cleanergy GHDP Project. The Grievance Mechanism should cover as a minimum the following:

- Grievance Mechanism Purpose;
- Definition of Grievance;
- Roles and Responsibilities;
- How Grievances will be management;
- Complaint Register;
- Confidentiality/Data Management;
- How conflicts of interest will be dealt with; and
- Protection from Retaliation process.

9 Assumptions and Limitations

** In accordance with the purpose of Scoping, this report does not include detailed specialist investigations on the receiving environment, which will only form part of the impact assessment phase.*

The findings included in this Scoping Report are based on existing information from specialist studies undertaken in the project area, preliminary assessments undertaken by specialists for the proposed Cleanergy GHDP Project as well as information obtained from environmental GIS databases.

A detailed description of the site-specific environmental attributes will be updated during the impact assessment phase once all the specialist studies have been concluded.

10 Undertaking of Oath by the EAP

SRK and the EAPs managing this project hereby affirm that:

- To the best of our knowledge the information provided in the report is correct, and no attempt has been made to manipulate information to achieve a particular outcome. Some information, especially pertaining to the project description, was provided by the applicant and/or their sub-contractors. In this respect, SRK's standard disclaimer pertaining to information provided by third parties applies.
- To the best of our knowledge all comments and inputs from stakeholders and I&APs have been captured in the report and no attempt has been made to manipulate such comment or input to achieve a particular outcome. Written submissions are appended to the report while other comments are recorded within the report. For the sake of brevity, not all comments are recorded verbatim, and in instances where many stakeholders have made similar comments, they are grouped together, with a clear listing of who submitted which comment(s).
- Information and responses provided by the EAP to I&APs are clearly presented in the report. Where responses are provided by the applicant (not the EAP), these are clearly indicated.
- With respect to EIA Reports, SRK will take account of I&APs' comments and, insofar as comments are relevant and practicable, accommodate these during the EIA/EMP process.

11 Conclusions and Recommendations

The aim of this Scoping Report is to provide an indication of the identified, positive, and negative environmental and socio-economic impacts associated with the proposed project activities. The proposed project will be located within the New Industrial Zone on farm 58 in Walvis Bay. This site zoned as Industrial Area is in line with proposed project's description.

The PPP undertaken in the Scoping Phase plays an important role in determining possible impacts and allowing the concerns by the public to be adequately addressed in the Impact Assessment Phase of the EIA process.

The Scoping Report has presented:

- The environmental process undertaken so far;
- A brief description of the proposed project;
- A baseline description of the current environment;
- The potential environmental and social impacts identified to date; and
- The recommended environmental process to be followed to develop the EIA/EMP Report.

Once the Scoping Report has been accepted by the MEFT, an EIA report, including a Draft EMP, will be compiled and subjected to a round of public comment. The EIA report will then be submitted to the MEFT for decision-making. On submission of the EIR and EMP, notification will be sent to registered I&APs to inform them of the submission of the documents; and the opportunity to request copies of the Final reports.

Anticipated environmental, social, and cultural impacts have been identified and described in Section 7. Extensive consideration has been given to the proposed location and design of the project and no fatal flaws have been identified during scoping phase. Required specialist studies that will be conducted include a groundwater impact assessment, a heritage and archaeology assessment, a visual impact assessment, and a biodiversity impact assessment. A Social Impact Assessment will be undertaken as part of the mitigation measures during the Construction Phase of the project to allow for the full benefit of socio-economic benefits to materialise.

No fatal flaws have been identified during the preliminary environmental and social impact assessment.

Findings from specialist studies will be incorporated into the EIR and EMP during the EIA phase. The proposed comprehensive PPP in the PoS will ensure that the stakeholders are involved in the process, from the conception of the ECC application process to the end. It is anticipated that implementation of the PoS presented in this report will result in an adequate EIA process which will result in the formulation of a sound EMP to be integrated into the overall management system of the Cleanergy GHDP Project.

It is anticipated that implementation of the PoS presented in this report will result in an adequate EIA process which will result in the formulation of a sound EMP to be integrated into the overall management system of the proposed Cleanergy GHDP Project.

Prepared by

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Dr Laetitia Coetser
Principal Scientist/Partner

All data used as source material plus the text, tables, figures, and attachments of this document have been reviewed and prepared in accordance with generally accepted professional engineering and environmental practices.

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Appendices

Appendix A: Curriculum Vitae of the Project Team and Projects

Submitted as a Separate Document on the ECC System

Appendix B: MEFT Application Form

Submitted as a Separate Document on the ECC System i.e. Proof of Payment

Appendix C: Public Participation Process

Submitted as a Separate Document on the ECC System

Appendix C_ 1: Stakeholder Database

Appendix C_ 2: Project Announcement Notifications

Appendix C_3: Background Information Document

Appendix C_ 4: Newspaper Advert

Appendix C_ 5: Site Notices

Appendix C_ 6: Facebook Post

Appendix C_ 7: MEFT Meeting

Appendix C_8: Focus Group Meetings

Appendix C_ 9: Public Meeting

Appendix C_ 10: Comments and Responses Register

Appendix C_ 11: Stakeholder Communications

Appendix C_ 12: Competent and Commenting Authority Correspondence

Appendix C_ 13: Distribution of Scoping Report

Appendix C_ 14: Transmittal Notes of Scoping Report Distribution