ENVIRONMENTAL SCOPING ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PLAN FOR THE STORAGE AND HANDLING OF METAL ORES AND INDUSTRIAL CARGO ON ERF 4409 IN THE INDUSTRIAL AREA OF WALVIS BAY

BACKGROUND INFORMATION DOCUMENT



Prepared by:







1 INTRODUCTION

Geo Pollution Technologies (Pty) Ltd (GPT) was appointed by Wesbank Transport, a division of FP du Toit (Pty) Ltd (the Proponent) to undertake an environmental assessment for the proposed storage and handling of metal ores and industrial cargo on erf 4409, Walvis Bay, Erongo Region (Figure 1). The Proponent operates an existing warehouse on the erf which is located in Walvis Bay's industrial area, at the corner of 18th Road and 4th Street East. The facility will be used to receive and temporarily store metal ores to be exported via the Port of Walvis Bay. It will also receive industrial cargo imported via the Port and destined for African countries like Zambia and the Democratic Republic of Congo.

The Proponent requested that an application for an environmental clearance certificate (ECC) for the proposed operations of the warehouse be made. The ECC application will be made in terms of the Environmental Management Act, Act No. 7 of 2007 (EMA). A scoping environmental impact assessment (EIA) report and an environmental management plan (EMP) are proposed to be submitted to the Ministry of Environment, Forestry and Tourism's Department of Environmental Affairs (DEA) in support of an application for an ECC. The environmental assessment will include all operational and potential construction (upgrades and maintenance) activities associated with the planned project. While the application will be made in the Proponent's name, a third party may ultimately perform the operations under contract with the Proponent. The requirements of the EIA/EMP will then become part of the contract signed between the parties involved.

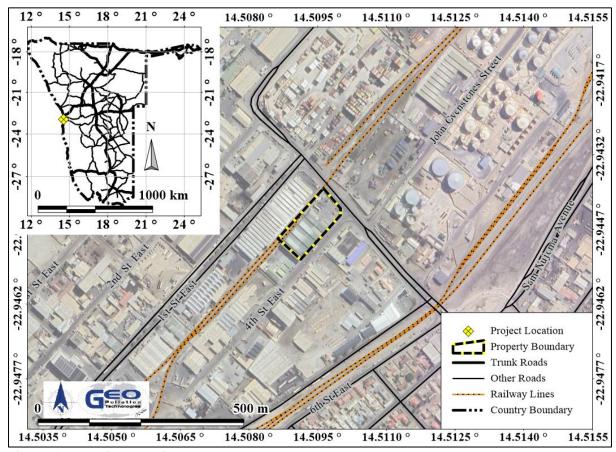


Figure 1 Project location

2 PURPOSE OF THE BID

With this background information document (BID), GPT aims to provide information to, and interact with, authorities and interested and affected parties (IAPs) regarding the project and the environmental assessment process. IAPs are therefore invited to register with GPT to:

- Be officially included in the list of registered IAPs for the project.
- Request additional information and clarifications.
- Provide information relevant to the proposed project which should be taken into account in the assessment of impacts.
- Share any comments, issues or concerns related to the project.
- Review and comment on the EIA, EMP and any other related submissions made to the DEA.

3 PROJECT DESCRIPTION

Activities which are considered for the environmental assessment are divided into the following phases: planning, construction (upgrades and continued maintenance), operational and decommissioning phases. A brief outline of expected activities for each phase is detailed below.

3.1 PLANNING PHASE

While planning for construction, operations, and decommissioning of the facility, it is the responsibility of the Proponent to ensure they are, and remain, compliant with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to, and during all phases, to ensure potential impacts and risk are minimised. Typical planning activities include:

- Obtain permits and approvals from local and national authorities.
- Ensure compliance to land use rights.
- Appoint a health, safety and environmental coordinator or similar to implement the EMP.
- Provide for a fund to cater for environmental incidents such as pollution clean-up and ecological restoration if ever required.
- Ensure all appointed contractors and employees enter into agreements which includes the EMP
- Establish and / or maintain a reporting system to report on aspects of construction, operations and decommissioning as outlined in the EMP and as required by the DEA.

3.2 Infrastructure and Construction

Erf 4409 is a developed property with an existing bonded warehouse in the industrial area of Walvis Bay. The warehouse is 5,000 m² in extent and has different bays for the storage and segregation of bulk products. The erf also has 3,200 m² open storage and parking as well as buildings covering 781 m² hosting offices, ablutions and related support infrastructure. All infrastructure will require periodic maintenance and upgrades which may entail some construction activities to be performed.

3.3 OPERATIONAL PHASE

Cargo to be handled on site can be distinguished between export and import cargo. Export cargo will be the ores of copper, manganese, nickel, lithium, chrome and zinc, as well as and cobalt hydroxide (Co(OH)₂). Copper can also include copper concentrates and cathodes. Imported cargo will be the industrial chemicals sulphur (S), sodium metabisulphite (SMBS) and magnesium oxide (MgO).

All metal ores, except manganese ore, and cobalt hydroxide will be received in bulk bags on flatbed trucks. Manganese ore will be received as bulk cargo in tipper trucks. The products may be offloaded directly into the warehouse or temporarily in the yard. If offloaded in the yard, it will only be for a short period until it is stuffed into containers or moved into the warehouse. In the warehouse bags will be emptied onto stockpiles. When a vessel arrives in the Port, the stockpiled ore will be loaded into skips and skips or containers will be transported to the designated berth in the Port. All ship loading activities will be handled by Namport or third party stevedores and thus will be outside of the scope of the environmental assessment. Imported industrial cargo will all be received in bags and will require short term storage in the warehouse until it can be transported to clients on trucks.

Dust suppression will be conducted inside the warehouse. Fire detection and firefighting equipment and procedures will be in place according to accepted standards. Administrative tasks, site security and cleaning of the premises will continue on a daily basis to ensure the effective and clean

operations of the facility. Environmental compliance monitoring and public liaison will continue throughout operations.

3.4 DECOMMISSIONING PHASE

Decommissioning of the entire facility is not foreseen during the validity of the ECC. Decommissioning will however be assessed, since activities like the removal of old infrastructure during construction and maintenance activities or upgrades form part of decommissioning. Where decommissioning occur, rehabilitation of the area may be required. Decommissioning will entail partial or complete removal of all infrastructure, including buildings and underground infrastructure. After decommissioning, any pollution present on the site must be removed or remediated.

3.5 Preliminary Identified Impacts

During the preparation of the EMP, all components of the environment will be considered. However, only those components which are, or may be, significantly impacted, or are deemed to be sensitive, will be assessed. These include the following:

- Human component (employee and visitor health and safety).
- Infrastructure (aesthetics, fire, integrity, etc.).
- Neighbours (dust, noise, aesthetics, waste, traffic).
- Groundwater, surface water and soil (ore dust, hydrocarbon spills, effluent generation and disposal, waste, pollutants).
- Ecosystem and biodiversity (dust, spilled ore and dust, pollutants).
- Social and cultural aspects (demographic processes, sense of place, community services etc.).
- Economic characteristics (revenue generation, employment, training, skills, revenue).

4 PUBLIC CONSULTATION

Geo Pollution Technologies invites all IAPs to provide in writing, any issues and suggestions regarding the project. This correspondence must include:

- Name and surname
- Organization represented or private interest
- Position in the organization
- **♦** Contact details
- Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application

All contributions by IAPs become public knowledge and will be circulated along with the reports as per the EMA requirements. The comments, inputs and suggestions will also be submitted to the DEA along with how any issues have been addressed in the EIA. The public participation process will remain ongoing during the environmental assessment. However, all comments and concerns should be provided timeously to ensure incorporation into the final report. The deadline for submission of comments will be communicated to all registered IAPs.

For any additional information the project team may be contacted at:



Your Rights as an IAP according to the Environmental Management Act, No7 of 2007, Government Notice No 30 (Environmental Impact Assessment Regulations)

Section 23.

- (1) A registered interested or affected party is entitled to comment in writing, on all written submissions made to the Environmental Commissioner by the applicant responsible for the application, and to bring to the attention of the Environmental Commissioner any issues which that party, believes may be of significance to the consideration of the application, as long as -
 - (a) comments are submitted within 7 days of notification of an application or receiving access to a scoping report or an assessment report;
 - (b) the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.
- (2) Before the applicant submits a report compiled in terms of these regulations to the Environmental Commissioner, the applicant must give registered interested and affected parties access to, and an opportunity to comment in writing on the report.
- (3) Reports referred to in sub regulation (2) include
 - (a) scoping reports;
 - (b) scoping reports amended and resubmitted;
 - (c) assessment reports; and
 - (d) assessment reports amended and resubmitted.
- (4) Any written comments received by the applicant from a registered interested or affected party must accompany the report when the report is submitted to the Environmental Commissioner.
- (5) A registered interested or affected party may comment on any final report that is submitted by a specialist reviewer for the purposes of these regulations where the report contains substantive information which has not previously been made available to a registered interested or affected party.

Section 24:

The applicant responsible for an application must ensure that the comments of interested and affected parties are recorded in reports submitted to the Environmental Commissioner in terms of these regulations, and comments by interested and affected parties on a report which is to be submitted to the Environmental Commissioner may be attached to the report without recording those comments in the report itself.