

COPY

MINISTRY OF WORKS AND TRANSPORT

2021-06-09

RECEIVED *Maurice*

OFFICE OF THE EXECUTIVE DIRECTOR

APP - 002305

+264 81 669 7608

info@eccenvironmental.com



MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

DIRECTORATE OF ENVIRONMENTAL AFFAIRS

09 JUN 2021

RECEIVED 1

Signature: *Tobias F.*

061-2088822

www.eccenvironmental.com



REFERENCE: ECC-99-313-LET-08-D

01.06.2021

Ministry of Works and Transport
 Private Bag 13341
 Windhoek
 Namibia

RECEIVED BY OFFICIAL STAMP

Received by Name:

Date:

Signature:

FOR ATTENTION: EXECUTIVE DIRECTOR (MRS. ESTHER N. KAAPANDA)

COPY TO: Mr. Timoteus Mufeti (Ministry of Environment, Forestry and Tourism – Environmental Commissioner)
 Mrs. Esther N. Kaapanda (Ministry of Works and Transport – Executive Director)

RE: APPLICATION FOR AN ENVIRONMENTAL CLEARANCE – NAMZINC (PTY) LTD FOR THE CONSTRUCTION OF A BULK STORAGE AND HANDLING FACILITY FOR INDUSTRIAL SULPHURIC ACID AT THE SKORPION ZINC WAREHOUSE AT THE PORT OF LÜDERITZ, IN THE !KARAS REGION, NAMIBIA.

Environmental Compliance Consultancy (ECC), has been engaged by Namzinc (Pty) Ltd the proponent, to act on their behalf, for the application for the construction of a bulk storage and handling facility for industrial sulphuric acid at the Skorpion Zinc warehouse at the Port of Lüderitz, in the !Karas Region, Namibia.

An environmental clearance was approved for the Skorpion Zinc refinery conversion facility. The proposed modifications to the refinery will enable the treatment of zinc sulphide (ZnS) concentrate, which Namzinc intends to transport from their sister company Black Mountain Mining (Pty) Ltd (operating zinc/lead mine & concentrator) in the Northern Cape, South Africa.

The proposed construction of a 15 000 tonnes bulk storage facility, will store industrial sulphuric acid at the Skorpion Zinc warehouse, Lüderitz Port Shed. The foundations would include piling then plate work (mild steel) pumps and pipes installation and the process of stevedoring the acid onto ships for exportation.

In terms of Section 32 (1) of the Environmental Management Act, No. 7 of 2007, ECC has determined that the Ministry of Works and Transport (MWT) is the competent authority for the proposed project as it triggers the following listed activity that falls within the jurisdiction and mandate of MWT:

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.

9.2 Any process or activity which requires a permit, license or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, license or authorisation or which requires a new permit, license or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.



(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.

9.5 Construction of filling stations or any other facility for the underground and aboveground storage of dangerous goods, including petrol, diesel, liquid, petroleum, gas or paraffin.

- o The proposed project envisions the construction of a bulk storage facility to handle and store industrial sulphuric acid at the Port of Lüderitz.

Due to the nature of the proposed project, the potential limited effects on the environment and society and the implementation of industry best practice mitigation measures, ECC has undertaken a high-level environmental assessment in order to produce an environmental assessment report and environmental management plan as per attached.

Therefore, ECC hereby submits the attached application for your consideration and review:

- **COMPLETED FORM 1 (ATTACHED)** – Environmental Management Act, No. 7 of 2007, section 32 Application Environmental Clearance Certificate
- **ENVIRONMENT ASSESSMENT REPORT**
- **PROJECT SPECIFIC ENVIRONMENT MANAGEMENT PLAN (EMP)**

Both the environmental assessment and environmental management plan hereto attached are submitted to the Office of the Executive Director of MWT for your review, input, and feedback. ECC kindly requests confirmation that the above application is acceptable by your office and in order to fulfill the requirements as per Section 17 (b) and Section 33 (1) of the Environmental Management Act, No. 7 of 2007.

ECC aspires to build an open and transparent relationship with your office and ECC understands that the MWT are the competent authority, therefore we understand that once MWT completes the review of the attached application, MWT will forward the application to the MEFT for their attention and action.

Should you or your office require our assistance with the details contained within this letter or any project specific details, please do not hesitate to contact us and we will gladly assist.

We look forward to hearing from you at your earliest convenience.

Yours sincerely,

Stephan Bezuidenhout
Environmental Compliance Consultancy
Contact: +264 81 669 7608
Email: stephan@eccenvironmental.com

Jessica Bezuidenhout Mooney
Environmental Compliance Consultancy
Contact: +264 81 669 7608
Email: jessica@eccenvironmental.com

