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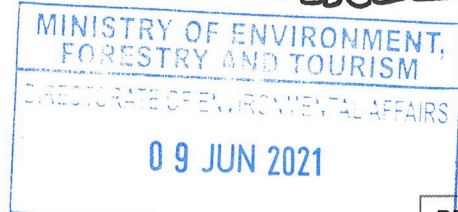
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061-208822



REFERENCE: ECC-99-313-LET-05-D

01.06.2021

Ministry of Works and Transport  
Private Bag 13341  
Windhoek  
Namibia



<b>RECEIVED BY OFFICIAL STAMP</b>
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**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 TRANSPORTATION OF INDUSTRIAL SULPHURIC ACID FROM THE NAMZINC REFINERY, WITHIN NAMIBIA TO LOCAL CONSUMERS, AND TO 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 transportation of industrial sulphuric acid from the Namzinc refinery, within Namibia to local consumers, and to 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 treated zinc sulphide concentrate will produce industrial sulphuric acid, which is proposed to be transported, within Namibia to local consumers, and to the Skorpion Zinc warehouse at the Port of Lüderitz, on a route distance of 293 kilometres for bulk storage and export. A total of 75 000 tonnes per annum will be trucked (or approximately 6 truck loads per day) will be transported for this project.

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.



(9.4) 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.

- o The proposed project envisions the handling and transportation of industrial sulphuric acid from the Namzinc refinery, within Namibia to local consumers, and to the Skorpion Zinc warehouse at the Port of Lüderitz, for bulk storage and export.

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,

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ENVIRONMENTAL COMPLIANCE CONSULTANCY  
CC/2013/11404

9 JUN 2021



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