

APP-004066

**STORAGE AND HANDLING OF RADIOACTIVE SOURCE MATERIAL ON ERF
3954, SWAKOPMUND, ERONGO REGION**

ENVIRONMENTAL ASSESSMENT PUBLIC CONSULTATION DOCUMENTATION



Assessed by:

Assessed for:



**Namaquanum Investment
Two CC**

July 2024

Proof of Public Consultation

- ◆ Notified and Registered Parties
- ◆ Proof of Notifications
- ◆ Letter from the National Radiation Protection Authority
- ◆ Comments and Responses Table
- ◆ Correspondence with IAPs
- ◆ Press Notices
- ◆ Site Notice

Proof of Notification: NRPA

TEL.: (+264-61) 257411 ♦ FAX.: (+264) 88626368
 CELL.: (+264-81) 1220082
 PO BOX 11073 ♦ WINDHOEK ♦ NAMIBIA
 E-MAIL: gpt@thenamib.com

To: The Director
 Atomic Energy & Radiation Protection Authority
 Ministry of Health and Social Services
 Private Bag 13198
 Windhoek

12 February 2024

Dear Mr. Tibinyanye

Re: Environmental Assessment and Management Plan for a Radioactive Source Material Storage and Handling Facility on Erf 3954, Swakopmund, Erongo Region

In terms of the Environmental Management Act (No 7 of 2007) and the Environmental Impact Assessment Regulations (Government Notice No 30 of 2012), notice is hereby given that an application will be made with the Environmental Commissioner for the construction and operations of a radioactive source material storage and handling facility on erf 3954, Swakopmund, Erongo Region. The Proponent for the project is Namaquanum Investments Two CC who has an existing workshop on erf 3954, Einstein Street, in the industrial area (Extension 10) of Swakopmund. The Proponent plans to refurbish the workshop and to construct a dedicated storage facility for radioactive source material used to calibrate and test drilling equipment (well logging equipment) used in the offshore oil exploration industry. Clients from the offshore exploration industry will utilise the workshop and source materials to perform the necessary calibrations and tests on their drilling equipment.

The facility will conform to stringent industry safety specifications. The preferred structure will be a six meter steel shipping container, placed on a concrete or paved surface. The four interior sides of the container will be lined by an approximately 50 cm thick, high density concrete layer. A prefabricated concrete slab will be placed on top of the container. The container will have intruder alarms and the area around it will be fenced and locked and entry strictly controlled. Warning signs will be placed, at minimum, at all entrances to the fenced area. The facility will be under 24 hour closed circuit television (CCTV) surveillance (outside and inside the container).

The existing workshop will be transformed into a state of the art workshop for the calibration and testing of drilling equipment. The floor of the workshop will be covered with a new 15 cm thick, reinforced and sealed concrete floor. Various workspaces will be created for the various tests and calibrations to be performed. Utilities like telecommunications, electricity and earthing, water, drainage, ventilation and compressed air will be upgraded or newly installed. An equipment wash bay will be constructed and this, together with various drains, will be connected to an oil water separator. Additional emergency infrastructure and equipment will include a fire detection system, firefighting equipment, emergency eye wash stations, radiation detectors with audible and/or visual alarms, etc.

Geo Pollution Technologies (Pty) Ltd was appointed by the Proponent to conduct an environmental assessment for the proposed project. As part of the assessment we notify interested and / or affected parties. You are hereby invited to share with Geo Pollution Technologies, any comments, issues or concerns related to the proposed project, for consideration in the environmental assessment.

Please forward your inputs to:

E-mail: ct@thenamib.com
 Fax: 088-62-6368.

Comments and registrations should reach us by 21 February 2024.

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Directors:

[Handwritten signature]
 12/02/2024

P. Botha (B.Sc. Hons. Hydrogeology) (Managing)

Proof of Notification: Swakopmund Municipality



TEL.: (+264-61) 257411 ♦ FAX.: (+264) 88626368
 CELL.: (+264-81) 1220082
 PO BOX 11073 ♦ WINDHOEK ♦ NAMIBIA
 E-MAIL: gpt@thenamib.com

To: Interested and / or Affected Party 30 January 2024

Re: Environmental Assessment and Management Plan for a Radioactive Source Material Storage and Handling Facility on Erf 3954, Swakopmund, Erongo Region

Dear Sir / Madam

In terms of the Environmental Management Act (No 7 of 2007) and the Environmental Impact Assessment Regulations (Government Notice No 30 of 2012), notice is hereby given that an application will be made with the Environmental Commissioner for the construction and operations of a radioactive source material storage and handling facility on erf 3954, Swakopmund, Erongo Region. The Proponent for the project is Namaquanum Investments Two CC who has an existing workshop on erf 3945, Einstein Street, in the industrial area (Extension 10) of Swakopmund. The Proponent plans to refurbish the workshop and to construct a dedicated storage facility for radioactive source material used to calibrate and test drilling equipment (well logging equipment) used in the offshore oil exploration industry. Clients from the offshore exploration industry will utilise the workshop and source materials to perform the necessary calibrations and tests on their drilling equipment.

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Please forward your inputs to:
 E-mail: ct@thenamib.com
 Fax: 088-62-6368.

Should you require any additional information please contact Geo Pollution Technologies at telephone 061-257411.

Thank you in advance.

André Paul
 Environmental Impact Assessment Practitioner

Directors:

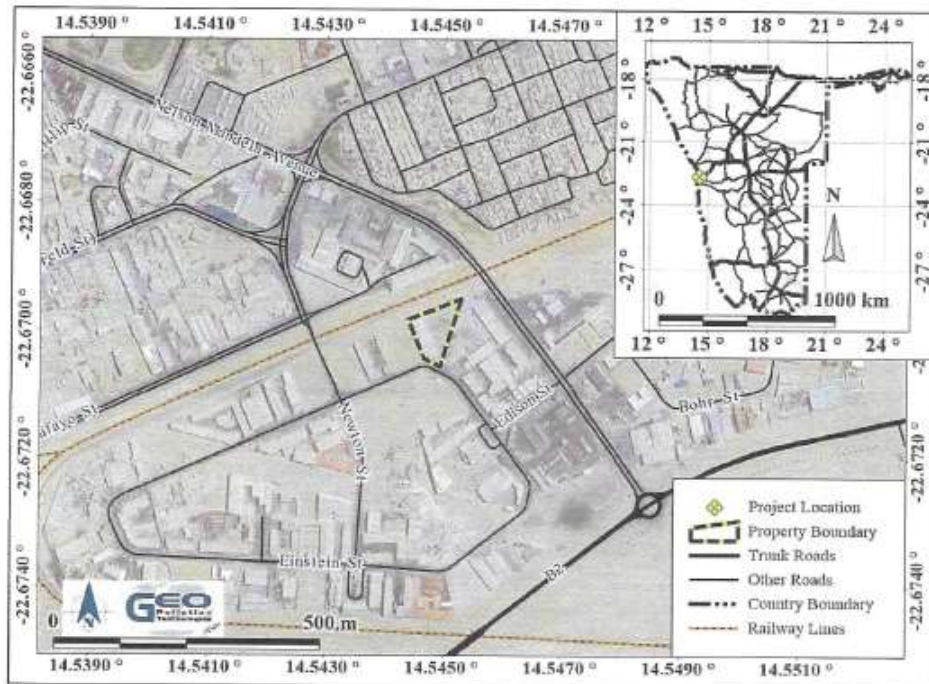
Swakopmund Municipality

[Signature] 2024-02-08

P. B. G. (B.Sc., Hons. Hydrogeology) (Managing)
 Engineering & Planning Services

Received

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Swakopmund Municipality
[Signature]
2024-02-08
General Manager
Engineering & Planning Services

Interested and Affected Parties Notified by E-Mail

Name	Organisation
Vera Schatz	Namibia Breweries Ltd (Erven 3976 and 3977)
Quintus Erasmus	QE Construction
Bernadette Weimann	Body Corporate Investment 625
Mberipura Hifitikeko	TransNamib
Bertus Eksteen	TransNamib
Alynsia Platt	TransNamib
Kristian H. Woker	Woker's Trust (Pty) Ltd (Erf 3953)

Registered Parties

Title	Name	Organisation	Date Registered
Mr	Alfeus Benjamin	Chief Executive Officer, Municipality of Swakopmund	2024-02-27
Ms	Alma Wallis	Private	2024-03-08
Ms	Annete Erbslöh	Private	2024-03-08
Ms	Berchen Kohrs	Earthlife Namibia	2024-02-29
Ms	Bernadette Weimann	Industrial Investment 625 Body Corporate	2024-03-11
Dr	Detlof Von Oertzen	VO Consulting	2024-02-27
Mr	Faried Abu-Salih	Private	2024-03-07
Mr	Gerhard Byleveld	Advertising Displays	2024-03-08
Mr	J.C Brandt	Private	2024-03-09
Mr	Jens Porthmann	Private	2024-03-04
Mr	John Hopkins	Chairman, Swakopmund Residents Association	2024-03-18
Ms	Julika Becker	Private	2024-03-07
Ms	Katharina Geier	Private	2024-03-06
Mr	Kristian H Woker	Woker's Trust (Pty) Ltd	2024-03-06
Ms	Margo Bassingthwaighte	Private	2024-03-10
Ms	Michelle Pfaffenthaler	Private	2024-03-25
Mr & Mrs	Nicholas Preller	Private	2024-03-04
Mr	Olof Nederlof	Private	2024-02-29
Ms	Paulina Engelbrecht	Environmental Officer, Municipality of Swakopmund	2024-02-27
Mr	Pieter Hamman	Pieter Hamman Legal Practitioners	2024-03-04
Mr & Mrs	Ralf and Birgit Linow	Private	2024-03-12
Mrs	Riana Brandt	Private	2024-03-09
Ms	Talita Nel	Capricorn Estate Agency	2024-03-07
Mnr	Thimo Martens	Private	2024-03-08
Ms	Virginia Tsele	Interwaste Environmental Solutions	2024-02-28
Mr	Wiebke Frey	Private	2024-03-08
Ms	Wiltrud Patzner	Private	2024-03-07



Comments Responses Table – Comments are presented as received with no changes or corrections made to text

IAP Details	Comment / Concern	Response
<p>Detlof Von Oertzen Email: 27/02/2024</p>	<p><u>Initial Query:</u> Kindly register me as an interested and affected party for the planned Industrial Hazardous Waste Storage Site at Swakopmund.</p>	<p><u>Initial Response:</u> Thank you for your mail. I assume you are referring to the Radioactive Source Material storage facility in Swakopmund as per attached BID? Note that it is not hazardous waste that will be stored, but radioactive sources that will be used to calibrate and test drilling equipment for the offshore oil industry. I have registered to you for the project and will share the EIA/EMP with you for comment. You are also welcome to send me your initial comments/questions to be included/considered in the EIA. Do not hesitate to contact me for any additional information.</p>
	<p><u>Subsequent Query:</u> The document was well received, and yes, it is the project for which you’ve sent the BID for which I requested to be registered as an I&A party. As I also mentioned to Johann Otto, the BID suggests that its purpose will be “...to register the ECC application with the Ministry of Health and Social Services’ National Radiation Protection Authority...”. Please note that it is not merely a matter of registering the project, but also submitting a Radiation Management Plan (RMP) for such a facility, prior to the commencement of operations. As my company is providing a broad range of radiation protection services, we could develop a fit-for-purpose RMP, if of interest. Also, I’d be keen to see the EIA/EMP, where my interest is particularly focused on the radiation-related impacts – has a radiation impact assessment (RIA) been done for the EIA? In my view, a RIA is essential, as there are many (often baseless) fears about the use of radioactive materials. Again, we could do a RIA for inclusion in the EIA/EMP, if of interest. Thanks for establishing contact, please do not hesitate to approach us if we can be of assistance!</p>	<p><u>Subsequent Response:</u> I take note of your comments and will also forward your mail to the client.</p>

IAP Details	Comment / Concern	Response
<p>Virginia Tsele Email: 28/02/2024</p>	<p><u>Initial Query:</u></p> <p>I would like to register as an Interested and Affected Party on the subjected project. Would you kindly share registration forms and any available documentations/reports regarding the subjected application.</p>	<p><u>Initial Response:</u></p> <p>The email is sufficient for registration and I have now registered you. Attached is the BID for the project in case you have not received it yet. I will forward you the EIA/EMP for review once complete. In the meantime please send any comments or questions you may have for consideration in the EIA to me.</p> <p>Do not hesitate to contact me for any additional information.</p>
<p>Berchen Kohrs Email: 29/02/2024</p>	<p><u>Initial Query</u></p> <p>I kindly ask you to register Earthlife Namibia as I&AP for the Storage Facility for Radioactive Source Material in Einstein Street in Swakopmund.</p> <p>Contact: Bertchen Kohrs Chair of Earthlife Namibia</p> <p>Earthlife Namibia is a NGO concerned about environmental and social justice and looks back on 33 years of experience on the nuclear field. We are interested in the above mentioned project.</p> <p>I would highly appreciate if you send a confirmation of registration.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your mail and registration. I have added you on behalf of Earthlife on the stakeholders list. In case you have not seen the BID yet, please find it attached. We will forward all documentation to you for review prior to submission to MEFT.</p>
	<p><u>Letter Received from Earthlife Namibia :</u></p> <p>Earthlife Namibia is an NGO concerned about social and environmental justice and as such looks back on 34 years of experience on the nuclear field.</p> <p>Thanks to Geo Pollution Technologies for the opportunity to ask questions and raise concerns. There are plenty of both. When it comes to radioactive material, all the alarm bells are ringing.</p> <p>Many nuclear accidents happen around the world where radioactive material is released, with devastating consequences for the people and the environment. Both, human and technical errors are usually the cause of industrial accidents. There are no</p>	<p><u>Responses to Letter</u></p> <p>Calibration and testing LWD tools is highly specialised and require highly specialised equipment. It is GPT's understanding that there is no facility in Namibia with this type of technology. If there is, we are not aware of it.</p>

IAP Details	Comment / Concern	Response
	<p>accident-free guarantees in any business. Many of these accidents are being swept under the carpet.</p> <p>The fact that the calibration of test drilling equipment and the physical characterisation of borehole profiles with radioactive material is a known and accepted method worldwide should not obscure the fact that it is associated with dangers and must therefore be handled with greatest expertise and utmost care.</p> <p>Unfortunately, in the BID of Geo Pollution Technologies the isotopes to be used in the off-shore oil exploration are not mentioned. It is extremely important to distinguish between alpha, beta, and gamma radiation of the isotopes and to handle and store them accordingly.</p> <p>Even though the EIA is dealing with the storage of radioactive material, it seems necessary to educate the population about the use of this material.</p> <p>Interested and concerned Namibian residents are invited to direct their objections and questions to Geo Pollution Technologies, although it can be assumed that only insiders understand the principle of the process.</p> <p>The method intended for the project under discussion is applied in mining, mineral exploration, oil and gas well-drilling, in fracking (which is fortunately not done in Namibia) and even in water-well drilling.</p> <ul style="list-style-type: none"> • Can one therefore assume that this method has already been used in Namibia without the awareness of the Namibian citizens? 	
	<p>What isotopes are we talking about?</p> <p>In order to make comments, it is necessary to know which isotopes are to be stored on the Einstein Street premise in the Swakopmund industrial area.</p> <p>Judging by the equipment of the shipping steel container with a coating of approximately 50 cm high density concrete layer, one can assume that this structure is for the storage of a gamma emitter.</p> <p>Generally, small quantities of caesium-137 are used for the calibration of radiation detectors.</p> <ul style="list-style-type: none"> • Can we assume that indeed Caesium-137 is the isotope we are talking about? 	<p>The isotopes are Caesium-137 and Americium-241 Beryllium.</p> <p>Yes, gamma rays will be emitted</p> <p>The SRS will be supplied by an international supplier, QSA Global. See the RIA for MSDS and supporting documentation</p> <p>Decommissioned SRS will be returned to the supplier.</p> <p>Decontamination will only be required if a leak from one or more of the SRS occurred. Decontamination procedures will thus occur during operations if such a leak is detected. Decontamination will comprise of washing</p>

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	<ul style="list-style-type: none"> • Where will the material come from? Will it be obtained from an accredited source? • Where does the radioactive material go to after decommissioning of the plant? • How will the bunker and indeed the entire effected area be decontaminated after the plant is closed? 	<p>the contaminated area with tepid water and soap and disposable cloths. All cleaning material and water will be placed in an airtight container for storage in a secure location.</p>
	<p>Location of the storage facility</p> <p>It seems that Walvis Bay was the first choice when looking for a storage site.</p> <ul style="list-style-type: none"> • Why did Walvis Bay refuse to build the plant? • What tipped the balance in favour of the industrial area in Swakopmund? <p>Considering that the oil rigs are much closer to Walvis Bay, it seems to be the better choice.</p>	<p>Walvis Bay did not refuse as the Proponent never approached them. The Proponent has an existing property in Swakopmund which they wish to develop.</p>
	<p>Building the bunker to store highly radioactive substances is a decision with long-term consequences and needs to be well thought through, taking all factors into account, not just the location but the impact of the entire project.</p> <p>Residents of Kramersdorf and indeed the whole of Swakopmund are understandably very concerned about their safety. Even the people working in an industrial area should not be exposed to the risk of exposure and or a nuclear accident.</p> <ul style="list-style-type: none"> • Is there a chance that another location outside of any dwelling and human activity can be chosen? 	<p>The RIA indicates that the public will not be exposed to radiation under normal operating conditions.</p>
	<p>A photo taken at Einstein Street 111 shows shipping containers, apparently to be used for the storage of radioactive materials.</p> <ul style="list-style-type: none"> • Can we conclude from this that the project is already underway before an Environmental Clearance Certificate has been issued by government? <p>That would be illegal and would undermine any confidence in the entire project.</p>	<p>No. The containers served other purposes.</p>

IAP Details	Comment / Concern	Response
	 <p data-bbox="448 579 651 608">Einstein Street 111</p>	
	<ul data-bbox="495 632 1137 660" style="list-style-type: none"> • How is the proposed site protected against flash floods?  <p data-bbox="448 860 1361 1074">Although flash floods are rare in Namibia, they will inevitably come. The proposed site is in the lower reach of the Swakopmund river and sits at an estimated elevation of 28 m above normal sea level. The critical choking point of the Swakopmund river is the section where the C28 and the railway lines cross the river, some 3.7 km upstream at a normal river elevation of 35 meters above sea level. If that choking point would be clogged from debris like trees as flash floods regularly carry, there would be a major flooding risks of the proposed site.</p> <p data-bbox="448 1093 1361 1211">The major risk of flooding such installations are electrical faults in safety equipment and the buoyance of any equipment like containers. There is then also the risk of radioactive material leaking and catastrophic spreading of the contamination in a flash flood environment.</p> <ul data-bbox="495 1233 1361 1339" style="list-style-type: none"> • What kind of emergency measures will there be in place for such an event? • How will the site be protected against such flooding? Flash floods do not occur regularly, but they do occur. 	<p data-bbox="1391 632 2011 810">Refer to section Error! Reference source not found. It is extremely unlikely that a flash flood will impact the facility. There is a clear watershed between the site and the river. Two elevation profiles for two potential choke points were created. For both scenarios the water will flow around the obstruction and back to the river.</p> <p data-bbox="1391 831 2011 979">Heavy rainfall in Swakopmund and on the site itself may cause localised pooling. The catchment of erf 3954 is extremely small as indicated in Error! Reference source not found. As such significant flood damage that will result in the scenarios mentioned is highly unlikely.</p>

IAP Details	Comment / Concern	Response
	<ul style="list-style-type: none"> Are the Swakopmund emergency services equipped and trained to deal with a flooded nuclear facility? We doubt that. 	
	<p>Transport</p> <p>The transport of highly radioactive material is one of the major safety factors. The transport vehicles must be equipped appropriately, the drivers must be qualified and informed. In the event of an accident involving the transport vehicle, the driver must know what emergency measures need to be taken immediately.</p> <p>Namibia is a country with nuclear experience and as such should be equipped for the safe transport of radioactive materials, although accidents happen.</p> <p>The radioactive substance is normally stored in specially equipped metal containers. The nuclear material is extremely expensive and therefore a target for thieves and criminals. However, if the perpetrators are not aware of the danger of the loot and open the cans, this is their death sentence and possibly that of many others. It is known that tins have been violently broken because they were thought to contain something very valuable. This ended fatally.</p> <p>Last year, a container of highly radioactive material fell off a pick-up truck in Australia. After a long search, it was recovered unscathed in the bush. It would have been catastrophic if it had fallen into the wrong hands. This event is evidence of greatest negligence.</p> <ul style="list-style-type: none"> What measures will be taken to prevent all forms of accidents (road accidents, handling and loading of the material, etc.). What measures will be taken to prevent criminal action? 	<p>There is currently only one transport company in Namibia that is authorised by the NRPA to transport radioactive material. They have already been engaged and have indicated what steps need to be taken to obtain the necessary additional approvals for transport of the SRS, should the project realise.</p>
	<p>The legal issue</p> <ul style="list-style-type: none"> Is the necessary legislation, including regulations, in place for this business in Namibia? What are the recommendations of the National Radiation Protection Authority? What is the opinion of the Swakopmund City Council and other decision-makers in the city? 	<p>The EIA, RIA and ERMP is the first step in the obtaining all necessary permissions and approvals. The NRPA was notified of the EIA process and responded. They indicated that consent is required and that a final decision will be made pending the outcome of the EIA, RIA and issuance of an ECC.</p> <p>All concerns received from IAPs are included and addressed in this comments and responses table. The EIA, RIA and ERMP will be circulated to all registered parties for review and comment prior to submission.</p>

IAP Details	Comment / Concern	Response
	<ul style="list-style-type: none"> Are the concerns of Swakopmund residents being considered and properly reflected in the EIA? 	
	<p>Operational phase</p> <p>The BID states: Only suitably trained, qualified and authorised personnel will have access to the radioactive source material area, as well as handle and work with such material.</p> <ul style="list-style-type: none"> When is the start of construction expected (depending on when the ECC is issued, of course)? <p>It is unlikely that there will be sufficient persons in Namibia with the required qualifications.</p> <ul style="list-style-type: none"> Will there be sufficient time to train a suitably qualified team of employees? Or will foreigners be employed due to a lack of skilled local manpower? 	<p>The Proponent intends to start construction once and if the ECC is approved and the approvals from the NRPA and Swakopmund Municipality are obtained. Actual dates are not known.</p> <p>Due to the highly specialised nature of the work, skilled persons will have to be sourced from elsewhere. Unskilled and semi-skilled employees will be sourced locally (e.g security, administration, etc.)</p>
	<p>Safety Requirements</p> <p>The BID states: Regular leak tests will be performed as per individual sources' requirements, to ensure it remains within the threshold limits.</p> <ul style="list-style-type: none"> How will the tests be carried out? What are the threshold limits for the individual sources? What measures will be taken to prevent contamination of surface water, groundwater, soil and air? 	<p>Standardised wipe tests. Refer to section Error! Reference source not found. and section Error! Reference source not found. for procedures to prevent contamination.</p>
	<p>The BID states further: The existing workshop will be transformed into a state of the art for the calibration and testing of drilling equipment.</p> <p>In addition to the storage, this involves much more practical handling of highly radioactive material, more vulnerability to accidents and escape of radiation.</p> <p>The entire area must be shielded from the outside world like a high-security zone, similar to a nuclear reactor.</p> <ul style="list-style-type: none"> How can this be achieved? Can you confirm that the Specific Safety Requirements No. SSR-1 of the IAEA ("SITE EVALUATION FOR NUCLEAR INSTALLATIONS", in 	<p>SSR-1 is not applicable to the proposed facility of the Proponent. SSR-1 states:</p> <p><i>The requirements in this publication apply to all nuclear installations [10], as follows:</i></p> <ul style="list-style-type: none"> <i>Nuclear power plants;</i> <i>Research reactors (including subcritical and critical assemblies) and any adjoining radioisotope production facilities;</i> <i>Storage facilities for spent fuel;</i>

IAP Details	Comment / Concern	Response
	<p>particular Requirement 12: Potential effects of the nuclear installation on people and the environment”) will be followed through with scientific and technical vigor?</p>	<ul style="list-style-type: none"> • <i>Facilities for the enrichment of uranium;</i> • <i>Nuclear fuel fabrication facilities;</i> • <i>Conversion facilities;</i> • <i>Facilities for the reprocessing of spent fuel;</i> • <i>Facilities for the predisposal management of radioactive waste arising from</i> • <i>nuclear fuel cycle facilities;</i> • <i>Nuclear fuel cycle related research and development facilities.</i> <p>However, despite it not being applicable, significant effort was made to ensure proper evaluation of the site and risks.</p>
	<p>Can you confirm that the IAEA rules contained in the Safety Report Series No. 16: CALIBRATION OF RADIATION PROTECTION MONITORING INSTRUMENTS of 2000, in particular the requirements for calibration facilities will be fully observed?</p>	<p>Safety Report Series No. 16: CALIBRATION OF RADIATION PROTECTION MONITORING INSTRUMENTS of 2000 is not applicable to the facility. Its scope is as follows:</p> <p><i>This report is intended to serve those who are establishing or operating calibration facilities for radiation monitoring instruments. The sources of radiation and associated apparatus and calibration techniques presented are examples of what established calibration laboratories have deemed adequate.</i></p> <p>It therefor serves facilities that calibrate the radiation monitoring equipment that will be used by the Proponent to, amongst others, monitor radiation exposure of workers on site (i.e. dosimeters or similar).</p>
	<p>Health of the employees</p> <ul style="list-style-type: none"> • How regularly will the employees be medically examined? • Which medical check-ups are carried out regularly? 	<p>A health and safety policy in accordance with local laws, and regulated by IAEA, will be put in place and strictly followed. The objectives of which will be to protect the health of the general public and the employees, and to prevent debilitating accidents resulting from the use of</p>

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	<ul style="list-style-type: none"> • Is the medical staff trained to evaluate the health status of exposed employees? • Are employees provided with adequate medical and financial care if their health is affected by occupational circumstances, keeping in mind that gamma radiation is dealt with? • Are employees informed about the risks of their work before they sign an employment contract? • What kind of personal protection will employees receive in the form of clothing, masks, etc.? • And finally, what is the expected lifetime of the entire project? • Who will monitor the plant from A to Z? • Who will take responsibility for any accidents? • Will any victims be provided with medical and financial care? • What is the plan for decommissioning? <p>In view of the planned dangerous operation, Earthlife Namibia finds the many questions and comments justified. We trust that they will be taken into consideration when preparing the EIA and EMP.</p>	<p>radioactive materials. All employees will be informed of the risks involved with working with radioactive material.</p>
<p>Olof Nederlof Email: 29/02/2024</p>	<p><u>Initial Query:</u></p> <p>TO WHOM THIS MAY CONCERN</p> <p>Re: Consent for a Noxious Industry/Hazardous Storage (Radioactive Source Material Storage And Handling Facility) on Erf 3954 Swakopmund Extension 10</p> <p>I am writing this letter in regards to the consent referenced above. I am writing this letter as a concerned and angry resident of Swakopmund.</p> <p>Swakopmund has been my home for over 30 years, I was basically raised here. I am so blessed to call Swakopmund my home. In all of those years, there has been no events that ever shocked me until recently. On the social media platform Facebook, I saw a post that horrified me to the core. The post in question was about a consent to build a storage and handling facility for hazardous, radioactive source materials.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your mail. I take note of your objection letter. Just to be clear, we are dealing with the environmental impact assessment process for the proposed facility. Objections against consent should be directed towards Stewart Planning/the Municipality who deals with the consent application. Nevertheless, I will, based on your email, add you to the stakeholders list of the environmental assessment process and also include your letter in the environmental assessment report which will be submitted to the National Radiation Authority and the Ministry of Environment, Forestry and Tourism for review. Prior to submission of the reports we will circulate it to all registered stakeholders, such as yourself, for</p>

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	<p>I am totally against the idea of a facility holding hazardous and radioactive materials in a populated town. I have read through the background information document (which was attached to the Facebook post) and even though it mentions about safety of the structure and storage of the radioactive materials, I am not convinced. This is a huge risk to the health of every citizen and animals in Swakopmund and to the environment. It doesn't matter how well the structure is built or how safe and secure the radioactive materials are stored, there will always be a chance of an accident happening with perhaps deadly consequences. But what if there was an accident? What impact will it have on the health of every living person and animal living in Swakopmund? What impact will it have on the environment? With all due respect, but you are playing with fire with the lives of every living person and animal in Swakopmund.</p> <p>Swakopmund is a beautiful coastal town surrounded by the beauty of the Namib Desert and the mighty Atlantic Ocean. It is a very popular holiday destination for not only for Namibians but also for international visitors. You cannot build such facilities in such a popular town. I reiterate that you are playing with fire with not only the lives of every person living in Swakopmund, but also with the lives of persons from other countries as well. Facilities such as this, should be build where it will not harm people and animals and the environment.</p> <p>Even though it will be up to the Council to either approve or disapprove the consent for the building of the storage facility to store radioactive materials, but I strongly believe that the citizens in Swakopmund should have a vote to approve or disapprove, because this proposal is risking our health and lives and we should have a say in it as well. This will have an impact on the future generations to come.</p> <p>This letter is not a formal objection letter, but I will still OBJECT to the highest level to the consent for a noxious industry/hazardous storage (radioactive source material storage and handling facility) on ERF 3954 Swakopmund, Extension 10.</p> <p>If you could kindly note of my objection and receipt of this letter, I would be grateful.</p>	<p>review and comment. Please rest assured that we will conduct an in-depth scientific assessment of the proposed project and make our recommendations based on this assessment.</p> <p>Please do not hesitate to contact us for any additional information.</p>
<p>Jens Porthmann Email: 28/02/2024</p>	<p><u>Initial Query: 28 February 2024 08:51 (addressed to CEO of the Swakopmund Municipality and to the town planners dealing with the consent application</u></p> <p>Dear Mr. Benjamin,</p> <p>My family and I are residents of Swakopmund and are deeply concerned about the potential extreme danger of the above-mentioned planned facility, especially in view of the very close proximity to high-density DRC, as well as Mondesa and Kramersdorf.</p>	<p><u>Initial Response: 28 February 2024 at 13:10:31 by the town planner</u></p> <p>Thanks for your email and written objection. In reading Article 95(I), I get the impression that you were made to believe that this facility will permit the dumping of foreign nuclear waste and toxic waste on Namibian territory which is not the case.</p>

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	<p>I shall not dwell on the obvious inherent noxiousness, hazardousness and danger of the planned facility, but suffice to point out that, in the letter and spirit of Article 95(1) of our Constitution, it is clearly outlawed by both the Environmental Management Act 7 of 2007 and the Atomic Energy and Protection Act 5 of 2005.</p> <p>Trusting in your and Swakopmund Municipal Council's due consideration and consequent outright rejection of ANY related application.</p> <p>Thanking you in advance.</p> <p><u>Subsequent Response (addressed to the town planner): 29 February 2024 06:55</u></p> <p>Thank you for your response, advice and attached information.</p> <p>Concerns remain, however.</p> <p>For instance, why can the facility not be built more remotely where it is not populated? And, what about the harsh and corrosive conditions at the coast?</p> <p>Trusting in your due consideration.</p> <p><u>Subsequent Response (addressed to the town planner and Geo Pollution Technologies) 04 March 2024 13:30</u></p> <p>Good day Mr. Otto,</p> <p>Thank you for your advice.</p> <p>It would be appreciated if my concerns/questions could be addressed in the Environmental Impact Assessment report.</p> <p>I am copying our correspondence to the e-mail address you provided. .</p>	<p>Instead, the radioactive substances will be used to calibrate and test drilling equipment for the oil exploration industry – nothing to do with any nuclear waste or the nuclear industry. Please find attached, for your information, the public background information document on the project. You are welcome to share the BID document with anyone for their information as well. More information will follow from the developer.</p> <p>In any case, your objection has been recorded with our office.</p> <p><u>Subsequent response by the town planner: 1 March 2024 at 16:52:12</u></p> <p>Dear Mr Prothmann,</p> <p>Thank you for the questions and noting your remaining concerns. We hope your concerns and questions will be considered and addressed in the EIA report from Geo Pollution Technologies (GPT).</p> <p>GPT invites all interested and affected parties (IAPs) to provide in writing, any issues and suggestions regarding the project. Any comments, suggestions, concerns and/or objections will be considered by GPT in their EIA report: to register please email: ct@thenamib.com</p> <p>The results of the EIA will determine whether the project can be executed on this erf and will make recommendations to such an effect. The report will be submitted to all registered parties for review before final submission to the Ministry of Environment, Forestry and Tourism. The Ministry and the applicable competent authority, Ministry of Health and Social Services' National Radiation Protection Authority will review and decide on the issuance of an environmental clearance for the project.</p>

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		<p>Thank you for input and participation.</p> <p><u>Subsequent response by Geo Pollution Technologies:</u> Mon 04/03/2024 2:24 pm</p> <p>I confirm receipt of your email and registration as an interested and affected party for the project. Your concerns as outlined below is noted and will be addressed in the EIA. I understand you have received the BID from Johann. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>
<p>Pieter Hamman via Marina Loubser Email: 04/03/2024</p>	<p><u>Initial Query:</u></p> <p>Good Day</p> <p>Enclosed hereto please find our letterhead, which is self-explanatory, for your further attention.</p> <p>Kind regards</p> <p><u>Letter:</u></p> <p>Dear Sir/Madam</p> <p>Subject: Formal Objection to Proposed Application for Consent Use for Noxious Industry and Hazardous Material Handling</p> <p>We are writing to you on behalf of various members of the business community in Swakopmund to express their deep concern and urgency regarding the proposed application for consent use of property situated in our industrial area for a noxious industry and the storage and handling of hazardous materials.</p> <p>Our clients, as residents and businesspersons in Swakopmund, are deeply invested in the well-being of the Swakopmund community and environment. Our clients strongly object to this proposal on numerous grounds, including but not limited to the significant risks of:</p>	<p><u>Initial Response:</u></p> <p>Your email of 4 March 2024 refers. I confirm receipt of your email with objection and have registered you as an interested and affected party on the environmental impact assessment (EIA) side of the project. We are busy with the environmental impact assessment (EIA) and will include and address your objection in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

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	<p>1. Environmental Concerns: Our clients are deeply concerned about the potential environmental risks posed by this proposed development. The storage and handling of hazardous materials on the property could lead to soil contamination, groundwater pollution, air quality degradation, and adverse impacts on local ecosystems. It is imperative to protect our natural resources and biodiversity.</p> <p>2. Health and Safety Risks: The storage of hazardous materials presents severe health and safety risks to nearby residents, workers, and wildlife. Potential hazards such as toxic fumes, chemical spills, fires, explosions, and long-term health effects must be carefully considered and mitigated.</p> <p>3. Public Health Impacts: Our clients are alarmed by the potential public health impacts associated with exposure to hazardous substances. Increased rates of respiratory illnesses, cancer, birth defects, and other health problems could result from proximity to the proposed facility.</p> <p>4. Property Values: The presence of a hazardous waste storage facility could significantly diminish property values in the surrounding area. This would have adverse effects on homeowners, businesses, and local tax revenues, undermining the economic stability of the community.</p> <p>5. Legal Compliance: Our clients urge you to thoroughly review whether the proposed development complies with zoning laws, land use regulations, environmental protection statutes, and other applicable laws and ordinances. Any violations or inconsistencies must be addressed before moving forward with the application.</p> <p>6. Community Opposition: There is widespread opposition within the community to this proposed development. Our clients have gathered evidence of this opposition through petitions, letters of concern, public meetings, and statements from residents, businesses, and community organizations that can be made available on request.</p> <p>7. Alternative Locations: Our clients recommend exploring alternative sites for hazardous waste storage that may be more suitable in terms of environmental, health, and safety considerations. Industrial zones, remote areas, or facilities with advanced safety measures should be considered viable alternatives.</p> <p>8. Lack of Adequate Mitigation Measures: Our clients challenge the adequacy of proposed mitigation measures to address potential risks adequately. Evidence of emergency response plans, containment systems, monitoring protocols, and liability</p>	

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	<p>insurance coverage must be provided to ensure the protection of public health, safety, and the environment.</p> <p>9. Precedent Setting: Approving this proposal could set a dangerous precedent for future development projects in the area, potentially leading to further industrialization or hazardous waste storage. Our clients express serious concerns about the long-term implications of such a decision.</p> <p>10. Community Rights: Our clients assert the community's rights to participate in the decision-making process regarding land use and development projects that could impact their health, safety, and quality of life. Transparency, accountability, and meaningful public consultation are essential aspects of democratic governance.</p> <p>11. The proposed consent use of this property does not align with the approved 2020/2040 structure plan.</p> <p>12. Tourism: This application will hurt the Swakopmund Tourism industry in various ways:</p> <p>(a) Prosperous Tourism relies on the natural beauty and cleanliness of an area. Visitors will be deterred by the presence of industrial facilities and the associated pollution.</p> <p>(b) Concerns about exposure to hazardous chemicals could lead to decreased visitation and economic losses for tourism-dependent businesses.</p> <p>(c) Negative publicity surrounding the establishment of hazardous waste facilities can tarnish the reputation of Swakopmund as a tourist destination. Media coverage of environmental accidents, regulatory violations, or health concerns may deter potential visitors and impact the long-term viability of tourism-based economies.</p> <p>(d) Tourism is a significant source of revenue and employment in the Erongo and in particular the Swakopmund region. The presence of hazardous waste facilities may lead to decreased property values, loss of jobs in tourism-related industries, and reduced spending by tourists due to concerns about safety and environmental quality.</p> <p>(e) Tourism stakeholders often advocate for sustainable development practices that balance economic growth with environmental protection and social equity. Hazardous waste facilities may conflict with the principles of sustainable tourism by jeopardizing the natural and cultural resources that attract visitors in the first place.</p>	

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	<p>13. Insurance: This application will impact the insurance of surrounding properties to the following extent:</p> <p>(a) Risk Assessment: Insurance companies assess risks associated with properties when determining premiums. If a property in the immediate vicinity is rezoned to a designation that is deemed hazardous or noxious, insurance companies may perceive higher risks associated with the surrounding properties. This could be due to potential environmental hazards, increased crime rates, or other factors associated with the new zoning.</p> <p>(b) Premium Increases: Rezoning to a hazardous or noxious designation can lead to increased insurance premiums for surrounding property owners. Higher premiums can be a financial burden for property owners and may also affect property values.</p> <p>(c) Availability of Coverage: In some cases, insurance companies may be hesitant to provide coverage for properties located in areas with hazardous zoning due to the increased risks involved. This lack of insurance availability can make it difficult for property owners to protect their assets and may deter potential buyers or investors from acquiring property in the area.</p> <p>(d) Liability Concerns: Property owners will also for good reason become concerned about liability issues associated with owning property in a hazardous or noxious zoning area. If accidents or incidents occur on the property, liability claims could result in significant financial losses. Insurance coverage helps mitigate these risks, but if coverage is limited or unavailable, property owners may be more inclined to object to rezoning.</p> <p>(e) Impact on Businesses: Businesses operating in the rezoned area may face challenges obtaining insurance coverage for their operations. This can affect their ability to operate effectively and may lead to increased operating costs or even closure.</p> <p>14. Structural damage to surrounding properties: The property in question is situated on granite rock. This will require extensive blasting in the construction of the "bunker". As council, you are well aware of the extensive damage that has been caused to other properties in town due to construction blasting operations.</p> <p>(a) The potential for structural damage to surrounding properties cannot be overstated. Given that the proposed site is situated on granite rock, any construction involving extensive blasting poses a significant risk to the stability and integrity of nearby structures. The force generated by such blasting activities can cause vibrations</p>	

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	<p>that may lead to cracks, subsidence, and other forms of structural damage to adjacent buildings.</p> <p>(b) As a council, you are undoubtedly familiar with the detrimental effects that construction blasting operations have had on properties in our town. Instances of cracked walls, damaged foundations, and compromised structural integrity have been reported in areas where blasting has been conducted for various construction projects. Allowing similar activities to take place in such proximity to residential and commercial properties would undoubtedly exacerbate these risks and could result in costly repairs and potential safety hazards for occupant's.</p> <p>(c) Furthermore, the potential for structural damage extends beyond immediate neighbouring properties. The ripple effects of blasting-induced damage could spread throughout the community, impacting property values, insurance premiums, and overall quality of life for residents. This is a risk that our community simply cannot afford to take. d) Therefore, our clients strongly urge the council to consider the threat of structural damage to surrounding properties as a compelling reason to reject the proposed application for consent use. The potential consequences of such activities far outweigh any perceived benefits, and the safety and well-being of our community must be prioritized above all else.</p> <p>In light of the serious risks and concerns outlined above, our clients urge you to reject the proposed application for consent to the use of property for a noxious industry and hazardous material handling facility. The potential consequences of this project are too great to ignore, and the health and safety of our community must be prioritized above all else. Instead, we implore you to promote sustainable development practices that minimize harm to human health and the environment and prioritize the well-being of current and future generations.</p> <p>Thank you for considering our objections to this proposed development. Our clients trust that you will give careful consideration to the concerns raised by them and other concerned residents and make the decision that is in the best interests of our community and the environment.</p>	
<p>Nicholas Preller Email: 04/03/2024</p>	<p><u>Initial Query:</u></p> <p>1. Health and Safety Risks: Radioactive materials can pose significant health risks if improperly handled. We are concerned about the potential for accidents, leaks, or spills that could release radiation into the surrounding environment, leading to long-term health consequences for ourselves and future generations.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your email. I confirm receipt of your email and registration as an interested and affected party for the project. Your concerns as outlined below is noted and will be addressed in the EIA. In case you have not received the</p>

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	<p>2. Environmental Impact: Radioactive materials can have a detrimental impact on the environment. We are worried about the potential contamination of soil, groundwater, and water reservoirs, which could harm residents as well as local ecosystems and wildlife.</p> <p>3. Property Values: The presence of a radioactive storage facility can lead to a decline in property values in the surrounding area. We as Homeowners are concerned about potential financial losses and difficulties in selling our properties if such a facility is established nearby.</p> <p>4. Stigma and Perception: The presence of a radioactive storage facility will create negative perceptions about the town and its desirability as a place to live or visit. This could have adverse effects on tourism, economic development, and the overall reputation of the town.</p> <p>5. Emergency Preparedness: As Residents, we have concerns about the town's preparedness to handle emergencies related to the storage facility, such as fires, natural disasters, or terrorist threats. We question whether local emergency services are adequately equipped and trained to respond to such incidents.</p> <p>6. Lack of Public Input: As residents, we feel that the decision-making process regarding the facility's development has been opaque and lacking in public participation, and we hereby voice our dissatisfaction and demand a more transparent and inclusive approach to decision-making.</p>	<p>BID yet, please find it attached. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>
<p>Kristian H Woker Email: 06/03/2024</p>	<p>Thank you very much for your mail of 15 February 2024.</p> <p>Unfortunately we have to advise that we completely OBJECT to the establishment of a radioactive source material storage and handling facility on our neighboring Erf No. 3954 (Swakopmund), Einstein Street, Erongo Region.</p> <p>Besides all the usual concerns of having such an outright dangerous facility right next door, we are especially concerned about the future status of this facility. What happens, if this facility gets older and deteriorates ? What happens, if the Owners and / or Managers depart one day from Namibia or go into liquidation ? What happens, if the facility is damaged by outside factors or an accident happens, whilst the material is being handled on the premises ? We have seen too many bad examples in Namibia (for example many abandoned mines) and also worldwide (Chernobyl being the best example), where such dangerous facilities are simply left by the original operators and</p>	<p><u>Initial Communication:</u></p> <p>Please receive attached notification for an environmental impact assessment we are conducting for erf 3954, Ext 10, Swakopmund.</p> <p>Do not hesitate to contact us for more information.</p> <p><u>Subsequent Response:</u></p> <p>I have registered you on the environmental impact assessment side of the project which we are conducting. Your concerns as outlined below is noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me</p>

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	<p>the local population has to suffer the consequences. The suddenly no one is any more accountable or taking care of the aftermath.</p> <p>The storage of the material is dangerous enough (whilst in storage) but the handling thereof poses an even bigger risk for us. How will the bunker be accessed for use of the stored radioactive material, how long will it stay open for access, how will radioactive material be removed from the store, where will testing and calibration be done, how will the radioactive material be transported to and from the store & site ? Anything can / could go wrong during one of the above processes.</p> <p>Our biggest concern is also that this facility will instantly diminish the value of our own property (Erf 3953). Nobody would want to rent from us anymore. The stigma attached to this area will then always be negative.</p> <p>We realize that there is a need for such a facility but then this should be located well outside a municipal area like near the Rubbish dumps (in a large enough well fenced off area) or behind Dune 7 (Walvis Bay). The granite ground near Dune 7 would be especially ideal for the establishment of such a facility (underground). To locate such a potentially dangerous facility in the midst of a residential town in our view would be extremely reckless and irresponsible (towards the local inhabitants and visitors of this town). It simply does not make sense to us to locate such a facility in the midst of a Town, which specializes on Tourism and has Residential Areas nearby (Mondesa and Kramersdorf).</p> <p>To summarize: We absolutely OBJECT to this envisaged project and trust & hope that Council rejects it outright.</p>	<p>for any additional information pertaining to the EIA process or any other comments you may have.</p>
<p>Katharina Geier Email: 06/03/2024</p>	<p><u>Initial Query:</u></p> <p>To whom it may concern</p> <p>I herewith would like to hand in my objection against the storage and handling of radioactive material on ERF 3954 Swakopmund</p> <p>I am a resident of Swakopmund living in Kramersdorf. Transport and handling of radioactive material in the surrounding of a town is dangerous and for several reasons put the residents in risk.</p> <p>I would like to register for discussion and questions. Please send confirmation of this registration to me via email.</p>	<p><u>Initial Response:</u></p> <p>I have registered you on the environmental impact assessment side of the project which we are conducting. Your concerns as outlined below is noted and will be addressed in the EIA. In case you have not received the BID yet, please find it attached. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

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<p>Julika Becker Email: 07/03/2024</p>	<p><u>Initial Query:</u></p> <p>I would like to voice my concern regarding the plan to change the use of land in order to build a bunker for radioactive waste in Einstein Street, Swakopmund. Please register my name among those in opposition to the plan to build any kind of storage or bunker in or near Swakopmund for the long-term storage of radioactive waste, because:</p> <ol style="list-style-type: none"> I am a resident of Swakopmund and am concerned about the health risks involved for myself and future generations of residents of Swakopmund. The location is too close to residential areas, the risks posed to people and the environment is huge and unpredictable. There is no guarantee for control of what happens at such a facility over time when people, governors, governments and companies (responsibilities) change. Radioactive waste will be life threatening and toxic for over thousands of years for people, ground water, soil and air. The Municipality of Swakopmund and Stewart Planning have not taken adequate steps to inform, educate and involve all residents of Swakopmund as interested and affected parties about this vital and life changing plan. There should at least be a well-advertised public information meeting in the Town Hall and a public petition for all the residents to voice their opinion and/or opposition to such a dangerous, life threatening change in land use. <p>Please inform me of all further steps in handling this matter.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your email. I confirm receipt of your email and registration as an interested and affected party on the environmental impact assessment side of the project. Please note that the facility is not planned for the storage of radioactive waste. In case you have not received the BID yet, please find it attached. Your concerns as outlined below is nevertheless noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>
<p>Talita Nel Email: 07/03/2024</p>	<p><u>Initial Query (addressed to the Town Planners and the Swakopund Municipality): 27 February 2024 4:17 PM</u></p> <p>Please find attached hereto the letter being self-explanatory.</p> <p><i>Letter:</i></p> <p>Dear Sir/Madam,</p> <p>SUBJECT: OBJECTION T APPLICATION FOR CONSENT – NAMAQUANUM INVESTMENTS TWO CC (ERF 3954, EINSTEIN STREET, SWAKOPMUND)</p> <p>We write with earnest concern and formal objection to the proposed development submitted by Namaquanum Investments Two CC, seeking consent for the establishment of an above or underground bunker facility on Erf 3954 in Swakopmund Extension 10. The intended utilization of this facility, encompassing the storage and handling of hazardous radioactive substances, as well as calibration tests for offshore</p>	<p><u>Initial Response (by the Town Planner):</u></p> <p>Thank you for lodging your collective concern and/or objection to the proposed radioactive source material storage and handling facility on Erf 3954, Einstein Street, Swakopmund. Your concern/objection will be recorded in the consent use application.</p> <p>Note that the Namaquanum Investments Two CC has appointed Geo Pollution Technologies (GPT) to undertake an Environmental Impact Assessment (EIA). GPT invites all interested and affected parties (IAPs) to provide in writing, any issues and suggestions regarding the project. Any comments, suggestions, concerns and/or objections will be considered by GPT in</p>

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	<p>oil exploration drilling equipment, presents a multitude of intricate issues warranting meticulous consideration and scrutiny.</p> <p>Our objection is framed by several paramount considerations, which include, but are not limited to:</p> <p>Proximity to Residential and Industrial Areas:</p> <p>The proposed site's hazardous nature, located in close proximity to both residential and industrial zones, notably our Madison Business Park on Erf 3949, Einstein Street, Swakopmund, raises considerable apprehensions.</p> <p>This situation prompts grave concerns regarding potential adverse impacts on the safety, health, and well-being of the local community and surrounding businesses.</p> <p>Cumulative Hazards in the Industrial Area:</p> <p>The inherent risks associated with any industrial area are further compounded by the introduction of a facility designed for the storage of radioactive materials. This convergence amplifies risks exponentially, creating an unacceptable level of danger that may extend beyond the proposed facility's perimeters.</p> <p>Lack of Clarity in the Application:</p> <p>The application is deficient in crucial details pertaining to the nature of the hazardous materials, such as their physical state (liquid, gas, or solid). This lack of clarity undermines our ability to comprehensively assess potential risks and the adequacy of proposed safety measures.</p> <p>Need for Water Resources for Radiation Control:</p> <p>Inadequacies in addressing the water requirements for radiation control are apparent in the application. Given the nature of neutrons and their particles, which necessitate significant water use to decelerate radiation, clarity on this aspect is imperative to ensure the safe handling of radioactive materials.</p> <p>Inadequate Packaging Information:</p> <p>Insufficient information regarding the packaging of radioactive materials is a critical concern. The absence of clear identification and safety protocols for packaging raises serious apprehensions about the potential for mishandling, accidents, and the resultant impact on both human health and the environment.</p>	<p>their EIA report. Please find attached the background information document (BID) which explains how to register as an IAP and to submit further comments.</p> <p>The results of the EIA will determine whether the project can be executed on this erf and will make recommendations to such an effect. The report will be submitted to all registered parties for review before final submission to the Ministry of Environment, Forestry and Tourism. The Ministry and the applicable competent authority, Ministry of Health and Social Services' National Radiation Protection Authority will review and decide on the issuance of an environmental clearance for the project.</p> <p><u>Subsequent Response: (by Geo Pollution technologies)</u></p> <p>Thank you for your email. I confirm receipt of your email and registration on behalf of Madison Business Park as an interested and affected party on the environmental impact assessment side of the project. In case you have not received the BID yet, please find it attached. Your concerns as outlined in the letter are noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

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	<p>Additional Equipment and Costs:</p> <p>The proposed facility imposes an additional burden on the municipality, necessitating the acquisition of specialized equipment such as survey meters, contamination meters, and personal dosimeters for individuals in close proximity.</p> <p>The associated costs and resources required for the maintenance and operation of such equipment should be thoroughly considered.</p> <p>Inherent Risks of Radioactive Materials:</p> <p>Radioactive materials, being inherently hazardous and imperceptible to human senses, present a significant challenge in terms of containment, detection, and response in the event of mishandling or accidents.</p> <p>The potential consequences of such incidents are severe and could have lasting impacts on the health of the community and the integrity of the environment.</p> <p>Insufficient Public Communication and Engagement:</p> <p>The absence of a transparent and comprehensive communication strategy regarding the proposed development raises significant concerns. Adequate public engagement is paramount, and residents and businesses in the vicinity should be provided with detailed information and opportunities to voice their concerns.</p> <p>Health Risks:</p> <p>Exposure to hazardous materials poses severe health risks to both working individuals and residents in the surrounding area. Airborne pollutants, water contamination, and soil pollution can lead to respiratory issues, skin problems, and other health complications.</p> <p>Environmental Pollution:</p> <p>Accidental spills, leaks, or releases of hazardous substances can result in environmental pollution, affecting local ecosystems, water sources, and soil quality. The facility may contribute to long-term environmental degradation, impacting biodiversity and natural habitats.</p> <p>Safety Concerns:</p> <p>Proximity to train tracks increases the risk of accidents during transportation, such as derailments or spills, potentially leading to immediate dangers for nearby</p>	

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	<p>communities. The facility itself may be at risk of accidents, fires, or explosions, posing a threat to both property and lives.</p> <p>Property Values and Liveability:</p> <p>The presence of a hazardous facility can negatively impact property values in the surrounding area, making it less attractive for potential buyers or tenants. Reduced liveability due to concerns about safety and pollution can lead to a decline in the overall quality of life for residents as well as property value.</p> <p>Negative Impact on Tourism:</p> <p>Despite its location in a light industrial area, Swakopmund, being a tourist destination, may suffer from a decline in tourism if the perception of the area is associated with industrial hazards and environmental risks.</p> <p>Long-term Sustainability Impact:</p> <p>The long-term sustainability of the region may be compromised, affecting the ability of the community to thrive economically, socially, and environmentally.</p> <p>In light of the aforementioned concerns, we implore you to meticulously evaluate the potential risks and implications associated with the proposed development. The safety and well-being of the Swakopmund community should be paramount in the decision-making process.</p> <p>We respectfully request that you reject the application by Namaquanum Investments Two CC for the proposed noxious industry/hazardous storage facility on Erf 3954 Swakopmund Extension 10.</p> <p>Thank you for your attention to this matter. We trust that you will approach this issue with the seriousness it deserves and prioritize the long-term safety and prosperity of our community.</p> <p><u>Subsequent Query (to Geo Pollution Technologies): 07 March 2024 13:53</u></p> <p>Our Trustees at Madison Business Park, situated in Swakopmund, requested that we should register with you as an interested and affected party with regards to the attached.</p> <p>Please advise if there is a process applicable in this regard, since it would be great if we could be informed of any information regarding this application/development in the future.</p>	

IAP Details	Comment / Concern	Response
<p>Wiltrud Patzner Email: 07/03/2024</p>	<p><u>Initial Query:</u></p> <p>To whom it may concern</p> <p>Dear Sir/ Madam</p> <p>Herewith I would like to hand in my objection against the storage and handling of radioactive material on Erf 3954 Swakopmund, Extension 10.</p> <p>I am a resident of Swakopmund, Kramersdorf.</p> <p>Transport and handling of radioactive material in the surrounding area of a town is dangerous, and for several reasons put the residents on risk</p> <p>I would like to register for discussion and questions.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your email. I confirm receipt of your email and registration as an interested and affected party on the environmental impact assessment (EIA) side of the project. In case you have not received the BID yet, please find it attached. Your concerns as outlined below are noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>
<p>Fariied Abu-Salih Email: 07/03/2024</p>	<p><u>Initial Query (addressed to the Town Planners and the Swakopund Municipality):</u></p> <p>I would like to voice my concern regarding the plan to change the use of land in order to build a bunker for radioactive waste in Einstein Street, Swakopmund. Please register my name among those in opposition to the plan to build any kind of storage or bunker in or near Swakopmund for the long-term storage of radioactive waste, because:</p> <p>I am a resident of Swakopmund and am concerned about the health risks involved for myself and future generations of residents of Swakopmund. The location is too close to residential areas, the risks posed to people and the environment is huge and unpredictable</p> <p>There is no guarantee for control of what happens at such a facility over time when people, governors, governments and companies (responsibilities) change. Radioactive waste will be life threatening and toxic for over thousands of years for people, ground water, soil and air</p> <p>The Municipality of Swakopmund and Stewart Planning have not taken adequate steps to inform, educate and involve all residents of Swakopmund as interested and affected parties about this vital and life changing plan. There should at least be a well-advertised public information meeting in the Town Hall and a public petition for all the residents to voice their opinion and/or opposition to such a dangerous, life threatening change in land use.</p> <p>Please inform me of all further steps in handling this matter.</p>	<p><u>Initial Response (by the Town Planner):</u></p> <p>Your objection and concerns have been recorded with my office, thank you.</p> <p>Dear Geo Pollution Technologies, could you please register Fariied Abu-Salih as an interested and affected party for the EIA process?</p> <p><u>Subsequent Response (by Geo Pollution Technologies):</u></p> <p>With reference to the below, please note that I have registered you for the EIA side of the project. Your concerns as outlined below is noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

IAP Details	Comment / Concern	Response
<p>Annette Erbslöh Email: 08/03/2024</p>	<p><u>Initial Query (addressed to the Town Planner)</u></p> <p>In this letter I would like to make it very clear that I am against this planned project in Swakopmund in every aspect.</p> <p>I have informed myself about this project in various announcements, statements and articles and also listened to the report on your project in the HITRADIO Namibia report by Ms. Brigitte Weidlich.</p> <p>If you compare the official statements and those of the journalist, I think there is a world of difference. Offshore drilling or not, Namibia staying on the ball etc. is absolutely irrelevant in my eyes, because such a storage, even if supposedly secured, does not belong in a residential area, in the statements called "industrial area" - it is also ridiculous. Lined containers 6 m long with 50 cm thick compacted concrete walls in the interior etc. may sound reassuring, but they are not, as they are clearly not stored underground. Where do you want to install airlocks? The interior of a container is certainly not sufficient for this.</p> <p>What happens when the containers are "full", supposedly not waste, which is obviously not correct. They must be stored and therefore presumably moved or the contents must be transported. Here we are talking about "hazardous goods transportation". Who ensures safety? Who supervises it? Where is the radioactive waste then stored? These must be very special storage facilities. Are they really secure or do they even exist? And from the sound of it, there is no experience in Namibia and "you have to specialize in it now" is the statement. In addition, Cesium 137 is to be used for this. That's all that needs to be said! (The accident occurred in Chernobyl in 1986. Even today, mushrooms and game meat in the Bavarian Forest are still highly contaminated with radiation). The very tools used at that time are probably particularly radioactive and therefore the protective clothing etc. will also be contaminated. And this "waste" must or should be temporarily stored in the containers in Swakop. There is allegedly a low risk In the description by GEO Pollution Technologies, the material is described as hazardous, in a statement by Mr. Otto only as minimally hazardous ... That is already far too much.</p> <p>There are reports in the press of "underground storage", but in the description by GEO Pollution Technologies this is just another possibility. With the safety measures described, above-ground storage is far too unsafe. Water is used, which will then be contaminated This also poses a high risk. Can we still allow ourselves to contaminate water in our country? NO!</p>	<p><u>Initial Response (by the Town Planner):</u></p> <p>Thank you for raising your objection to the radioactive facility which will be recorded. Your careful evaluation of available information, and valuable input on the project is much appreciated.</p> <p>Dear Geo Pollution Technologies team,</p> <p>Will you please consider and address the comments, concerns, and objections raised by Annette Erbslöh in your Environmental Impact Assessment?</p> <p><u>Subsequent Response (by Geo Pollution Technologies):</u></p> <p>I confirm receipt of your email sent to the Town Planners. I have taken the liberty of registering you as an interested and affected party on the environmental impact assessment side of the project. Your concerns as outlined below is noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. It is indeed unfortunate that in the modern technological age of smartphones and social media the sharing of information becomes muddled. I trust that ultimately the EIA/EMP will present the facts in a way that is clear to everyone, and make recommendations that is based on scientific data taking into consideration of the local environment. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

IAP Details	Comment / Concern	Response
	<p>If Namibia thinks it has to get involved here, ONLY under the supervision of companies from abroad that have been practicing this for years, but never in a residential area of any size. If you really think you need to implement such a project/process etc. in Namibia, then plan it at the Rössing Mine.</p> <p>You must remember that we are exposed to a high level of insecurity in our country due to the unfortunately existing high level of corruption, companies operating in this country for whom the environment, safety, etc. mean absolutely nothing, but only their profit or greed and we are therefore exposed to a much higher risk than in countries such as the USA, UK, Germany.</p>	
<p>Gerhard Byleveld Email: 08/03/2024</p>	<p><i>Initial Query (addressed to the Town Planner):</i></p> <p>Dear sirs</p> <p>With the sketchy information provided re “radioactive source material storage and handling” I wish to point out that the location of this facility is surrounded by other factories and with the Mondesa town around 200 m from there.</p> <p>In Swakopmund we have 80% of the time a SW wind which blows in the direction of Mondesa. The placement of such facility is therefore critical taking into account the content and radioactivity of the “CONTENT” of such bunker.</p> <p>Much more information re products/source materials etc should be made available for residents especially Mondesa and surrounding areas to actively participate and make a more informed contribution.</p> <p>I trust that the Municipality will delve deeper into this matter and as usual put the safety and livelihood of residents first.</p>	<p><i>Initial Response (by the Town Planner):</i></p> <p>Thank you for your written concern, input and objection to the radioactive facility. If you have not done so already, you can also register as an interested and affected party with Geo Pollution Technologies who have been appointed to undertake the Environmental Impact Assessment (EIA) process. The attached background information document explains how to register. There is no specific deadline but the sooner the better.</p> <p>Dear Geo Pollution Technologies,</p> <p>Please see below the comment on the southwesterly wind which I think is important to consider and address in your EIA.</p> <p><i>Subsequent Response (by Geo Pollution Technologies):</i></p> <p>I confirm receipt of your email sent to the Town Planners. I have taken the liberty of registering you as an interested and affected party on the environmental impact assessment side of the project. Your concerns as outlined are noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

IAP Details	Comment / Concern	Response
		<p>Radioactive material can only become airborne if it leaks from the capsule of the SRS. This is not likely to occur and the SRS will not be removed from the pig outside of the bunker or calibration room.</p>
<p>Thimo Martens Alma Wallis Email: 08/03/2024</p>	<p><u>Initial Query (addressed to the Town Planner):</u> Thursday, 8 March 2024 4:24 pm</p> <p>Please find attached objection letter.</p> <p><u>Letter:</u></p> <p>To whom this may concern</p> <p>Re: Hazardous Storage Facility on Erf 3954 Swakopmund Extension 10</p> <p>We would herewith like to hand in our objection to the Hazardous Storage Facility on Erf 3954 Swakopmund.</p> <p>Reasons for objection:</p> <p>The proposed facility is directly in Swakopmund, with high traffic volumes passing the storage facility daily.</p> <p>Radioactive waste can leak into our underground water channels or escape into the air – with the facility being so close to human population, this poses a high risk to human health and the environment.</p> <p>Would it not be better to create a storage facility outside of town?</p> <p>Radioactive waste only decays naturally over hundreds of years. How can the Municipality of Swakopmund guarantee the safe-guarding and proper upkeep of the storage facility for that duration of time?</p> <p>The proposal states that personnel will be monitored to make sure their radioactive exposure is within legal limits. What about the public or the personnel of business in close proximity? How will the health and safety of those individuals be guaranteed / monitored?</p> <p>In the proposal it is being stated that the concrete walls of the storage facility will only be 50cm thick. Overseas, similar radioactive storage facilities are being stored 500m underground. How can mere 50cm thick walls be thick enough? The proposed thickness of the walls does not correspond with the depth the canisters are be stored</p>	<p><u>Initial Response (by the Town Planner):</u></p> <p>I herewith confirm receipt of the objection letter from Thimo, thank you.</p> <p>Dear Geo Pollution Technologies, could you also consider the questions, comments, and objections raised by Thimo?</p> <p><u>Subsequent Response by Geo Pollution Technologies):</u></p> <p>I confirm receipt of your objection sent to the Town Planners. I have taken the liberty of registering you as an interested and affected party on the environmental impact assessment side of the project. Please note that the facility is not planned for the storage of radioactive waste. In case you have not received the BID yet, please find it attached. Your concerns as outlined below is nevertheless noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

IAP Details	Comment / Concern	Response
	<p>overseas. Added to that, that the proposed facility will be above ground, instead of underground.</p> <p>It is not being said what kind of radioactive waste will be stored – is it high-level or low-level waste? This makes a huge difference in the correct disposal procedure.</p> <p>The exact disposal procedure and nature of the waste storage is not clearly explained in the proposal – ie. Sentences such as “as an alternative option, the facility to store radioactive source material can also be partially underground” make the proposal sound like only ideas are being shared. If something can also be done, it is not said that it will be done. Where is the guarantee that all correct procedures are being followed – and which procedures are being implemented, as per law, pertaining the level of waste? None of this is being indicated in the proposal, thus we find the proposal not very clear and transparent.</p>	
<p>Wiebke Frey Email: 08/03/2024</p>	<p><u>Initial Query:</u></p> <p>I herewith hand in my concern against handling and storage of any radioactive material on Erf 3954 Swakopmund.</p> <p>I am a Swakopmund resident in the City and feel nothing in connection with radioactive things should be handle in a town due to the fact it is dangerous.</p> <p>I d like to register for discussions and questions . Could you please confirm registration.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your email. I confirm receipt of your email and registration as an interested and affected party on the environmental impact assessment (EIA) side of the project. In case you have not received the BID yet, please find it attached. Your concerns as outlined below are noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>
<p>J.C Brandt Riana Brandt Email: 09/03/2024</p>	<p><u>Initial Query:</u></p> <p>Proposed Storage and handling facility for radioactive source material at Namaquanum Investments two CC, Erf 3954, Einstein Street, Swakopmund</p> <p>We are writing to register on behalf of myself and my wife, Riana Brandt, our objection to the applicants’ application.</p> <p>While we understand the necessity of safe storage facilities for radioactive materials, we also have concerns about the safety of the inhabitants of Swakopmund, given the proximity of the proposed facility to residential areas. Radioactive materials, if mishandled or improperly stored, pose significant health and environmental risks.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your email. I confirm receipt of your email and registration as an interested and affected party on the environmental impact assessment (EIA) side of the project. In case you have not received the BID yet, please find it attached. We are busy with the environmental impact assessment (EIA) as per point four of your information request list and trust that your other questions will be answered in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me</p>

IAP Details	Comment / Concern	Response
	<p>Therefore, we believe it is essential for the community to be informed about the safety measures that will be implemented to mitigate these risks.</p> <p>Additionally, we would like to enquire whether the feasibility of locating such a facility in a more remote area, away from densely populated areas, has been considered. Building the facility in the desert, away from residential zones, could potentially reduce the risk to human health and the environment while still serving its intended purpose.</p> <p>We kindly request that you provide more detailed information regarding the proposed facility, including but not limited to:</p> <ol style="list-style-type: none"> 1. The types and quantities of radioactive materials that will be stored at the facility. 2. The safety measures and protocols that will be in place to prevent accidents and mitigate risks. 3. The emergency response plans in case of incidents or accidents. 4. Any environmental impact assessments that have been conducted. 5. Consideration given to alternative locations for the facility and the rationale for selecting the current site. 6. Training of the staff taking care of the operations and monitoring thereof and where the training takes place (which institutions) and for whose expense. <p>It baffles the mind of the public and every reasonable citizen that while Swakopmund is surrounded by hundreds of thousands of vacant land that the proponent elects to convert the property in question for purposes of storage and handling facility of radioactive source material.</p> <p>Thank you for your elaborate and eloquent assurance of how the proponent/the council/and all the other authoritarian institutions referred to by you will monitor the operation of the facility in order to protect the public at large. It is a well-known fact that our country is inundated with corruption and incompetence however these aspects are not addressed against the background of monitoring and safeguarding the public.</p> <p>Should the council approve the proponents' application will the council be prepared to indemnify affected persons against the risks of any negative potential risks/effects/losses/expenses by such person? Any such indemnification should be supported by appropriate guarantees/suretyships commensurate to potential losses.</p> <p>We are looking forward to hearing from you.</p>	<p>for any additional information pertaining to the EIA process or any other comments you may have.</p>

IAP Details	Comment / Concern	Response
<p>Margo Bassingthwaighe Email: 10/03/2024</p>	<p><u>Initial Query:</u></p> <p>As a resident of Swakopmund I totally OBJECT to the above mentioned being carried out in the town of Swakopmund, in the industrial area along Einstein Street on Erf 3954 Ext 10. It does not take into consideration the lives of innocent people should there be a leak or any such thing happening. It will impact on people’s health when things go wrong and you cannot guarantee that it won’t.</p> <p>Need I say anymore.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your email. I confirm receipt of your email and registration as an interested and affected party on the environmental impact assessment (EIA) side of the project. In case you have not received the BID yet, please find it attached. Your concerns as outlined below are noted and will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime, please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>
<p>Bernadette Weimann Email: 11/03/2024</p>	<p><u>Initial Query:</u></p> <p>Attached, please find a letter from the owners of Industrial Investment 625 Body Corporate.</p> <p>Letter: Reference: 3954S</p> <p>RE: Consent for a noxious industry/ hazardous storage (radioactive source material storage and handling facility) on Erf 3954 Swakopmund, Extension 10</p> <p>This letter serves to inform you that the owners of Erf 625 Swakopmund, Extension 10, object to the above planning application for the following reasons:</p> <ul style="list-style-type: none"> •Why must such facilities be operated inside town? Would it not be better accommodated at a mine or a more remote industrial site that would have the correct zoning? •What are the real dangers that might be imposed daily on humans operating and working within the relevant closer vicinity (inclusive of Erf 625)? •With the fact that this Erf is located directly at the railway, the derailment of a train, smashing into the relevant premises, and releasing "nuclear waste" is a big problem. •Such installations might impact the value of the surrounding Erfs and workshops. It might also make it difficult, if not impossible, to source future tenants or buyers for neighboring Erfs. 	<p><u>Initial Response:</u></p> <p>Your email and letter is well received. I have registered you on behalf of Investment 625 Body Corporate. Your concerns as outlined in the letter are noted and these together with your questions will be addressed in the EIA. We will forward the EIA and EMP documentation for your review and comment once complete. In the meantime please feel free to contact me for any additional information pertaining to the EIA process or any other comments you may have.</p>

IAP Details	Comment / Concern	Response
	<ul style="list-style-type: none"> •We would like to get more information about the applicant: Namaquanum Investments Two CC. We couldn't find any webpages or any other information about this company. •Additionally, we would like to receive more information about the work that is planned to be done on Erf 3954. Will there be radioactive waste? If so, will all requirements for the management and removal of radioactive waste be met? What radioactive material and how much will be stored? •Toxic materials remain highly radioactive for tens of thousands of years, posing a threat to the land, soil, freshwater sources, underground water, and humans. •We think that the above-ground storage facility is more dangerous than the alternative option of storing the radioactive material underground. <p>We oppose these plans and would like to receive further and more detailed information about the application. Please keep us updated on the situation.</p>	
<p>Ralf and Birgit Linow Email: 12/03/2024</p>	<p><u>Initial Query:</u></p> <p>We are residents of Swakopmund and have a few questions as to GPT's project in Einstein street:</p> <ol style="list-style-type: none"> 1. Kindly inform us as Swakopmund residents about the type of radioactive material you intend to store in Einstein street? 2. Where does the radioactive material come from? 3. How does it get transported to Swakopmund? 4. Why place such a unit in a fairly dense area instead of somewhere in the mining area near Rössing etc.? 5. How radioactive is the material and please give us a comparison if possible to the degree of radioactivity. 6. Will the company be paid for storing radioactive material? <p>We have major concerns about this project as to handling faults, pollution during operation(and afterwards - we all know that radioactive radiation cannot be destroyed and damage done to any genetic material/soil/water is permanent with potential detrimental outcome.</p>	<p><u>Initial Response:</u></p> <p>Thank you for your email and interest in the project. Your questions and concerns are well noted and will be answered/addressed in the environmental impact assessment (EIA) we are conducting for our client. I have also now registered you as interested and affected parties for the project. Just to confirm, it is not our project, but we were appointed as independent environmental consultants to conduct the EIA. I am not sure if you have seen the background information document yet, I therefore attach it again. It will answer some of your questions. The rest will be answered in the EIA which will be shared with you for review once complete. You will then get another chance to provide comments or questions which will be included in the final report to be submitted to the Ministry of Environment, Forestry and Tourism and the National Radiation Protection Authority of Namibia for their consideration and review. In the mean time you are welcome to provide more input / questions.</p>

IAP Details	Comment / Concern	Response
	<p>We live in a tourist attraction area providing income to about 50 - 80% of the people. This should not be at risk by something serving such a small community which can potentially be so harmful and cause longstanding effects. We are not a rubbish dump for other country's radioactive material - if this should be the case.</p> <p>Nobody is perfect and here no-one has experience in handling such material. The incidence rate would be quite high from human errors.</p> <p>Thus we generally don't agree to storage of such hazardous material in our town.</p>	
<p>Gerhard Byleveld Email: 28/03/2024</p>	<p><u>Initial Query:</u></p> <p>With reference to our telephone conversation this morning and my written submission at the bottom of the email, I wish to state the following:</p> <ol style="list-style-type: none"> 1. At present there appears to be a lot of confusion regarding the proposed "Radioactive Bunker" in Einstein Street, adjacent to Mondesa and other food related businesses. 2. Johan Otto requested inputs by 8 March 24 but many concerned citizens (e.g. residents from Mondesa and their Councillors) were not even aware of the time line. 3. Yesterday a meeting was advertised to be held at the Tamariskia Town Hall where around 50 persons were under the impression it was a formal session by either yourselves or Town Panning. Nobody took a lead in this fruitless gathering. Apparently a concerned citizen Mr Hertzberg wanted to encourage people to attend the "Municipal strategic briefing" to elevate these concerns (wrong place/wrong agenda"). As confirmed by you it was not arranged by either of you as leading parties. Be that as it may, this was a clear indication that there are far more concerned citizens than the 21 registered which you received up to now. 4. Due to the vague description of "radioactive source material" I would suggest that a much wider and more in depth communicate be put out (also via community leaders) so that citizens are well informed before making submissions. At present it might even include serious radioactive waste in a "bunker" adjacent to a town extension. What perception will this leave in the minds of potential Tourists once the "Greenies" get hold of it. 	<p><u>Initial Response:</u></p> <p>Thank you for the call and email. It is quite unfortunate that someone advertised a public meeting and that expectations were that we / the town planners are hosting the meeting. Thank you also for putting me into contact with the SRA chairman. I hope that through the SRA we can better disseminate information regarding the project and the way forward. I urge all concerned residents and parties to register with me in order to be included in the environmental assessment process. I am currently engaging with the client in order to address the current confusion and "panic" (if that is the correct word to use). I will write a short communication in which I will try and better explain the process we are following for the EIA, and hopefully this will put residents at ease in so far as the EIA process is concerned – i.e. that the correct processes will be followed and that all parties' will get an opportunity to review and comment on the EIA prior to it being submitted. I will forward said communication to you, the SRA, all parties registered with us in due course.</p>

IAP Details	Comment / Concern	Response
	<p>This EIA has the potential to probably stir up a lot of emotions, whether true or false, yet the best way to combat negative perceptions is adequate detailed information to the wider community for their inputs.</p> <p>I trust that you see my concerns as pro-active and meant in a positive light.</p>	
<p>Michelle Pfaffenthaler Email 22/03/2024</p>	<p><u>Initial Query</u></p> <p>I have been doing a bit of research myself and would like to raise concerns that I would like to see addressed:</p> <p>1) LIST OF MATERIALS. We need a comprehensive list of all the radioactive substances that will be used, e.e.radon, beryllium, plutonium.</p> <p>2) APPROPRIATE ACTIVITY Whilst calibration of equipment is standard in the oil drilling industry, this kind of work really needs to be done by experts as they are working with a variety of radioactive materials and both safe storage, and working with the materials will be important. In addition, disposal of contaminated wastes (including water) will be an issue. We need to identify if Namaquanum Investment Two CC has the expertise to do this kind of work and if it is not better to send the equipment to existing labs. We also need to know more about this company.. I do not find any mention of them on the internet, other than in relation to their commissioning you to do the EIA.</p> <p>3)ALTERNATIVE LOCATIONS. I do not think that it is appropriate for this facility to be in Swakopmund light industrialist are. I think that alternate locations should be investigated, more specifically in the heavy industrial sections of Luderitz and Walvis Bay.</p>	<p><u>Initial Response:</u></p> <p>Apologies, I was out of office end of last week. I hereby confirm you registration with Geo Pollution Technologies for the EIA side of the project. I also take note of your concerns as raised below and these are concerns that we will definitely look at and address in the EIA. I will later today circulate information that answers some of the questions you and the other stakeholders raised, for example pertaining to the types of radioactive isotopes to be stored on site.</p>

Widely Distributed Clarification Letter



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25 March 2024

To: The Chairman of the Swakopmund Residents Association,
 Registered Interested and Affected Parties,
 Concerned Citizens of Swakopmund
 Interested and Affected Parties

Dear Sir/Madam

Radioactive Source Material Storage and Handling Facility in Swakopmund

Geo Pollution Technologies, as appointed independent environmental assessment practitioner (EAP) for the above project, hereby acknowledges that there are currently concerns and confusion regarding the proposed project. Please allow us the opportunity to provide some clarifications regarding the project and the authorisation process for the project.

The Project

Firstly, let us consider the project itself. The proposed facility will under **no** circumstances receive, handle or store any radioactive waste. What will be stored, is commonly referred to as "radioactive sources". For this project, it will specifically be **sealed radioactive sources** where the radioactive material (radioisotope) is permanently sealed in a capsule or closely bonded and in a solid form. The capsules are often made of stainless steel and a search for "sealed radioactive sources" on the internet will show you what they look like, and how small they typically are.

The radioisotopes contained in the sealed sources planned to be stored and used on erf 3954, are indicated in the following table.

Radioisotope	Examples of where this radioisotope is commonly used
Americium-241/Beryllium*	Smoke detectors in homes and businesses Tool used to measure lead in paint samples Steel and paper production to measure and ensure uniform thickness of steel and paper sheets Industrial radiography, gauging applications, mineral analysis, and geological prospecting devices Soil moisture gauging (measurement)
Cesium-137	Radiology to treat cancerous tumours To measure and ensure the right fill level for packages of food, drugs, and other products. Soil moisture-density gauges Flow meters

* The beryllium component is not radioactive

The sources that will be stored on erf 3954 will be used to calibrate and test drilling and well logging equipment used in the offshore oil exploration industry. Apart from their primary containment, i.e. the capsule, they will remain stored inside secondary containment (called a pig), in the proposed bunker. The pig is a container made of a material such as lead, which blocks radiation. The bunker thus being the third "layer" of containment and also acting as a security bunker to prevent theft. Some sources have

Page 1 of 3

Directors:

P. Botha (B.Sc. Hons. Hydrogeology) (Managing)

such low radiation activity that there is no need to store them inside pigs. These sources are typically stored in a bunker only. The sources will be removed from the bunker for the duration of its use in calibration or testing of the drilling equipment which will occur on site. Upon decommissioning of the source, they will be returned to the manufacturer for safe disposal. More details on these aspects will be available in the environmental assessment report (see “The Authorisation Process” below).

The Authorisation Process

The Environmental Management Act of Namibia lists certain activities that may not be undertaken without environmental clearance. In order to apply for an environmental clearance certificate (ECC), an environmental impact assessment (EIA) must be conducted and an environmental management plan (EMP) prepared. These documents must be submitted to the competent authority and the Ministry of Environment, Forestry and Tourism (MEFT) for review and approval/rejection. For the current project, the reports, and an application for an ECC, will thus be submitted to the National Radiation Protection Authority (NRPA), as competent authority, and the MEFT. The NRPA will provide their recommendations to the MEFT regarding the project’s approval/rejection.

The environmental assessment process has, in short, the following phases:

1. Notification Phase: EAP notifies direct neighbours, authorities and interested and affected parties of the proposed project and invites them to provide an initial round comments/concerns to be considered in the environmental assessment. In order to give input, comments, concerns, or receive any further information beyond the notification phase, all parties must register with the EAP.
2. Assessment Phase: The EAP prepares the EIA and EMP in which all the project details are clarified. The environment is also described, impacts identified and management measures proposed. All comments and concerns received to date, are included and responded to, in the report, specifically included the comments and responses report, which will become public, as is the EIA and EMP. Based on the outcome of the EIA, the EAP will recommend that the project may or may not go ahead.
3. IAP Document Review Phase: The EIA and EMP are shared with all registered interested and affected parties for review. Interested and affected parties are again invited to, based on the review of the documents, provide comments.
4. Submission Phase: The comments received after the public review period, are included and addressed in the final EIA and EMP, which is then submitted to the NRPA and MEFT. All registered interested and affected parties are notified of the submission, and the final documents as submitted, are made available to interested and affected parties.
5. Public Review Phase: The MEFT provides another opportunity for the public to review and comment on the EIAs, this time directly to them via their online EIA Portal system.
6. Record of Decision Phase: The MEFT will, after receipt of the NRPA’s recommendations and their own review, reject or approve the ECC, or, if the reports are lacking information, request additional work to be conducted. Should an ECC be granted, the EAP will notify all registered IAP’s about the decision, only once an approved certificate was issued.

Currently we are still busy with the first two phases of this process. We usually do not give a deadline for comments and registrations and will accept these up to preparation of the final reports for submission to MEFT. However, to prevent further confusion, we decided to set a deadline for the initial round of registration and comments (Phase 1 as indicated above). The deadline is 12 April 2024. Remember that you do not have to submit comments by the 5th, but you should at least register in order to ensure receipt of the EIA and EMP for review. At that stage, you can still submit your comments based on the contents of the EIA and EMP. The EIA will, in addition to the technical explanations and discussions, provide a non-technical explanation of the project, in order to make sure everybody has a reasonable understanding of the project and its potential impacts.

Please note the following in terms of the relationship between the environmental assessment process and the town planning process. These are two separate processes, each with its own registration and reporting requirements, conducted by separate consulting firms. Thus, if you registered for the town planning process, you are not automatically registered for the environmental assessment process, and *vice versa*. Thus, once again, please make sure you register with Geo Pollution Technologies for the

environmental assessment process. Also note that the Municipality of Swakopmund's consent for the project (which is the town planning process) will be dependent on the outcome of the EIA and the issuance of an ECC.

We understand that someone advertised a public meeting addressed to "concerned citizens" in the Namib Times and on social media. It is also our understanding that the person(s) who advertised the meeting did not show up to chair the meeting. I can confirm that this meeting was not advertised or arranged by Geo Pollution Technologies, the town planners or the client. I am not sure if this was a deliberate, malicious attempt by someone to cause further turmoil, or whether it was somehow a simple misunderstanding. We understand the frustration this caused and wish to, for future reference, confirm that we will always have our company name, a contact person, our company logo, and contact details, on any advertisements for EIAs and public meetings we intend to host.

Lastly, it was also mentioned on some platforms that it is Geo Pollution Technologies who will lease the property for purposes of storing the radioactive sources. This is not the case and we remain an independent consultant tasked with conducting the environmental assessment for the project.

In summary:

- ◆ Please **register** with Geo Pollution Technologies, by 05 April 2024, to be included in the environmental assessment process.
- ◆ **All** registered parties **will** receive access to an electronic copy of the EIA and EMP documentation for review prior to submission to MEFT.
- ◆ Feel free to **share** this letter with any party or member of the community who may benefit from the explanations above, or who may still wish to register.
- ◆ The background information document (BID) for the project, which is only a very short introduction to the proposed plans, remains available for download at www.thenamib.com/projects/projects.html under the heading - **BID: Namaquanum Radioactive Source Material Storage and Handling Facility, Swakopmund.**

Do not hesitate to contact us for any additional information.

Sincerely



Dr André Faul
Conservation Ecologist
PhD Medical Bioscience

REDFORCE COLLECTS OVER \$33M FOR ONDANGWA

STAFF REPORTER ENGOVI

RedForce Debt Management has recovered over N\$33 million from Ondangwa stakeholders who had defaulted on their municipal accounts.

The figure, as at November last year, was revealed by Ondangwa town council spokesperson Petrina Shitalangabo-Mutikisha, who said the money was collected over a period of 10 months.

In September last year, Ondangwa was owed a cumulative N\$85 million by institutions, businesses and residents.

When asked what the debt-collection company's monthly target is, Shitalangabo-Mutikisha said council cannot disclose such information.

She, however, added that the council is "happy with the work they are doing thus far. The figures are there to see".

When RedForce was enlisted by the Rundu town council, the company had a monthly target of N\$5 million - one it failed to reach most months, leading to its contract being terminated at that town.

Different exercise

Meanwhile, the Ondangwa town council's incentive initiative, which has seen it writing off close to N\$700 000 in interest charged on accounts, is ongoing.

When asked whether there is any conflict between the initiative and RedForce's collection attempts, Shitalangabo-Mutikisha said they have experienced no challenges.

"The incentive is an initiative to help people whose debt accounts are growing on a daily basis. The collection by a debt-management company is a different exercise," she said.

"We should remember that this relief was introduced by council after going through reports from the debt-management company and it does not in any way affect their collections. To date, close to N\$700 000 has been written off already from the people who have settled their accounts. We encourage others to take advantage of this relief exercise," she said.

She further clarified that "all accounts handed over to RedForce are not charged interest for the period they are with RedForce - only collection fees".



HARD AT WORK RedForce has collected millions owed to the Ondangwa town council by defaulting stakeholders. PHOTO: KENYA KAMBORE

PUBLIC PARTICIPATION NOTICE

ENVIRONMENTAL ASSESSMENT AND MANAGEMENT PLAN FOR A RADIOACTIVE SOURCE MATERIAL STORAGE AND HANDLING FACILITY ON ERF 3954, SWAKOPMUND, ERONGO REGION

Geo Pollution Technologies (Pty) Ltd was appointed by Namaquanum Investments Two CC Ltd to undertake an environmental assessment for construction and operations of a radioactive source material storage and handling facility on erf 3954, Swakopmund, Erongo Region. Additional and location information about the project can be obtained at: <http://www.thenamib.com/projects/erf3954/>

The environmental assessment will be conducted according to the Environmental Management Act of 2007 and its regulations as published in 2012.

The Proponent has an existing workshop on erf 3954, Erongo Street, in the industrial area of Swakopmund. The Proponent plans to refurbish the workshop and to construct a dedicated storage facility for radioactive source material used to calibrate and test drilling equipment (well logging equipment, used in the offshore of exploration industry. Clients from the offshore exploration industry will utilize the workshop and source materials to perform calibrations and tests on their drilling equipment. The facility will conform to stringent industry safety and security specifications.

All interested and affected parties are invited to register before 21 February 2024 with the environmental consultant. By registering you are provided with the opportunity to share any comments, issues or concerns related to the project, for consideration in the environmental assessment. Additional information can be requested from:

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• NEW RAILWAY TO BOOST TRADE

Landmark Namibia, Botswana Trans-Kalahari railway spotlighted

The rail authorities of the two countries have been **lauded for the work done so far in order to make the project a reality.**



TOGETHER Namibia's transport minister John Mutorwa and his Botswana counterpart, minister Eric Molale. PHOTO: PREGIOUS NGHTUNJHO

STAFF REPORTER SWAKOPMUND

Works and transport minister John Mutorwa has officially signed an agreement for the Trans-Kalahari Railway Line Project during a joint ministerial committee meeting held on 2 February in Swakopmund, Namibia.

His Botswana counterpart, transport and public works minister Eric Molale, was present at the meeting to mark a crucial step towards the recognition of the cross-border railway initiative.

"After a series of discussions, we have concluded by signing an agreement with regard to investigating the possibility of constructing a railway line from the sovereign territory of Botswana, which, once it is visible and practically implemented, will link with the railway line in Namibia," Mutoewa confirmed.

In his statement, Molale said: "Botswana and Namibia are just facilitators and probably the owners of the railroad, but we are doing this in the interest of the Africa Continental Free Trade Area initiative

as well as the SADC Regional Integration Plan, where both documents call on member states to improve and expand on their infrastructure."

"That should become a catalyst for speedy economic growth for Africa and for the southern nations."

Crucial discussions

The committee, led by the Namibian transport ministry's executive director Esther Kaapanda and her Botswana counterpart Kgakamalo Ketshajwang, discussed crucial aspects of the project, including the proposed operational budget for the 2024-25 financial year.

In acknowledgment of the progress made, the ministers approved the reinforcement of the Trans-Kalahari Railway Project Management Office with the necessary expertise to expedite the drafting of

comprehensive terms of reference for the request for proposals. These are expected to be issued to short-listed respondents by March, with the appointment of a successful respondent anticipated by May 2024, aligning with the project's roadmap.

Expressing satisfaction with the commitment and progress demonstrated by rail authorities and senior officials, the ministers emphasised the importance of adhering to timelines. They reaffirmed their dedication to deepening strategic cooperation and partnership in transport infrastructure while nurturing the warm bilateral relations between Botswana and Namibia.

Construction on the Trans-Kalahari Railway Line is expected to commence in 2025, marking a transformative moment for regional connectivity and economic integration.

New 'home' for advocates

STAFF REPORTER WINDHOEK

"You provide a service to the public, and it's a lot of money to hire a lawyer. The least we can do is to deliver the best service at the best possible rate."

This is according to advocate Marius Boonzaier, who was elected chairman of the newly established Namibian Bar Association on 29 January.

"We are very excited. It's not every day that something like this happens," he said. Boonzaier's colleague and friend, advocate Abraham (Apie) Small, has been appointed as the secretary and treasurer, and advocate Herman Steyn wrote the association's constitution.

"I started the constitution with a clean slate. I saw an opportunity for a new beginning," Steyn explained. One of the constitution's provisions stipulates that the association should be a home for its members, where they can share knowledge, skills, information and experiences with each other. "People should feel comfortable and at home here."

Modern and flexible

The Namibian Bar Association's constitution allows its members to practice from any location.

"The constitution has been modernised. It is very flexible and provides for different segments of society to practice because not everyone can necessarily afford chambers in the beginning," Boonzaier explained.

According to him, it can also be ideal in cases where parents would like to



NEW Adv Herman Steyn (left) is the author of the Namibian Bar Association's constitution, Adv. Marius Boonzaier (middle) is the chairman and Adv. Apie Small is the secretary and treasurer. Photo: Kristien Kruger

practice from home or retired lawyers no longer want to incur the expenses of having full-time chambers (as lawyers and judges prefer to call their offices).

"An individual can practice from home and can still be a member of our association. The person still has access to a boardroom and research software. The facilities are here - for a fraction of the cost," Boonzaier explained.

"It's not because we are angry; our needs are simply not being met, especially concerning chambers," said Steyn.

Referrals

Boonzaier also emphasised that the association does not compete with attorneys.

"We are still a referral profession. A member of the public cannot just come to us; they still need a referral from an attorney. It's like the difference between a general practitioner and a specialist. You can't go to the specialist without a

referral," he explained.

According to Boonzaier, there were also other needs, aside from the issues regarding chambers, that the association identified and took into account to "keep up with life."

"Our constitution is drafted so that a person who has been a lawyer for 20 years automatically qualifies to become a senior lawyer," Steyn added that in such cases, the lawyer still has to apply for it.

Transparency

Another provision in the association's constitution - which differs from many others around the world - is that an individual may not be a member of the association if they are a member of a secret organisation.

"It's about objectivity. If you are representing a client, you should be able to lie in the trench with that person, walk a path together, and not be influenced by external factors," said Boonzaier.

"Openness and transparency are important to us," affirmed Steyn.

Ons Mense

irene@republikein.com.na

Vrou met 'n hart vir haar medemens

>> Reeds 15 jaar by Huis Acacia

Maggie Kotze het vroeër jare skoolgehou en 'n koffiewinkel bestuur, maar sy het uiteindelik haar roeping by CAN se tussentydse tuiste vir kankerpatiënte gevind.

Irene-Mari van der Walt

"Mense is ingesteel daarop – die oomblik as jy 'kanker' hoor hoor jy 'dood' en dis nie die waarheid nie. Daar is mense wat by ons kom kuier wat 20 of 25 jaar gelede met kanker gediagnoseer is wat nog steeds lewe. Ons probeer die dood 'uit kanker haal,' sê Maggie Kotze wat reeds die afgelope 15 jaar die matrone by Huis Acacia afgetree het.

"Ek het daarna nooit weer gewerk nie, want ek lewe my passie uit. Vyftien jaar later, en hier is ek steeds by Acacia," sê sy.

Maggie sê die algemene vrees onder pasiënte is om dood te gaan.

"Baie kere wanneer die pasiënte hier aankom, vra hulle of hulle gaan doodgaan? Ek sê dan ja, en dan sien jy die geskokte uitdrukking op hulle

gesigte. Dan verduidelik ek dat almal van ons gaan doodgaan, maar jy gaan nie noodwendig aan kanker doodgaan nie – jy kan van baie ander dinge doodgaan. Ek wat nie kanker het nie, kan byvoorbeeld oor die pad loop en 'n motor kan my raakry," sê sy.

"Dit is egter vir my die lekkerste wanneer pasiënte gesond word. Ek kan in Namibië enige plek gaan en iemand sal my herken en hulle arms om my kom sit. Om pasiënte weer raak te loop ná hulle van kanker genees is en hulle jou hulle arms om jou om dankie te sê, dan besef jy dat jy tog iets beteken," sê sy.

Maggie verduidelik Huis Acacia bied nie net verbygaan kankerpatiënte wanneer hulle behandeling ontvang nie, dis ook 'n plek waar pasiënte deur mense omring word wat hulle verstaan en 'n plek waar hulle sonder vrees kan praat.

"Alle pasiënte voel hulle kan met ons praat en dan luister ek net. Wanneer hulle klaar gepraat het, sê hulle dankie, hulle voel beter, maar jy het eintlik niks gedoen nie. Hulle kan nie altyd op gesprekke met hulle vriende en familie hê nie, want die geliefdes is bekommerd, maar met jou kan hulle opeentlik oor hul vrees praat," sê sy.

Diens wat reeds in Namibië is help ook uit by Huis Acacia om pasiënte moed in te praat.

"Hulle sê altyd hulle bet gedink hulle is die sikeste mens, maar dan kom hulle hier en besef daar is altyd iemand sieker as hulle," sê sy.

Sy sê ook dat Huis Acacia hoop aan pasiënte bied.

"Baie kere woon mense wat vir hul opvolgbesoek kom ook hier. Dié mense is reeds genees en hulle praat dan met die pasiënte en dit gee hulle hoop. Ons kry baie ouer mense wat vrede in hul harte het en sê hulle is nie bang om dood te gaan nie, maar ons hardste vegters is ma's met jong kinders. Hulle wil veg en wil aanhou



Maggie verkoop appels ten bate van die Bank Windhoek Kankerappieprojek. FOTO: MARIKKA



Maggie en haar man in Barcelona.

lewe vir hulle kinders," sê Maggie.

"Dit is baie rustig hier – die pasiënt kan eers slaap wanneer hulle wil – daar is nie 'n roetine nie. Dit is nie snos om by familie te kuier waar hulle 'n roetine moet volg nie," sê sy.

Haar grootste wens is dat pasiënte kankervry is.

"My wens is net kom, word gesond, gaan terug na jou mense toe en kom weer terug – hulle doen dit nie altyd nie. 'n Pasiënt moet in die jare ná die diagnose vir hul opvolgafsprake kom," sê Maggie.

Sy raai aan dat diens wat reeds kanker gehad het en hul nabye familie vir gereelde doktersbesoeke gaan.

"Gaan elke jaar dokter toe. Die oomblik as jy

vroeggediagnoseer word, is jou kans op herstel baie beter – moenie wag dat jy siek word nie," sê sy.

CAN het onlangs aangekondig dat Huis Acacia nou sewe dae per week oop sal wees, waar dit voorheen van Sondagmiddag tot Vrydagoggende oop was, en Maggie is vasbeslote om dié uitdaging aan te pak.

"Dis 'n groot stap, maar ons pasiënte neem geweldig toe. Die staatsposiënte raak nou so baie dat hulle op Saterdag en Sondag ook moet behandeling kry – so ons moet daarby inval. Dit is nuwe aanpassings en nuwe dinge, maar ek glo ons sal dit regkry," sê sy.

Maggie moedig die gemeenskap aan om betrokke te raak waar hulle kan.

"Nou dat ons meer pasiënte het, raak ons kostes ook meer. Jy dink dalk nie so nie, maar selfs 'n pakkie rys gaan help. Wanneer ons geldinsamelings hou, koop die appels, ondersteun ons projek, koop die kolwyntjies. Tien dollar is dalk nie baie vir jou nie, maar 'n klomp tien dollars bymekaar kan ons help om 'n verskil te maak. As iemand hier verbyry en kom aankop en sê hulle het vir ons 'n sakkie aartappels, is ons altyd so dankbaar," sê sy.

Diens wat selfs net hul tyd kan afstaan om geselskap aan die pasiënte by Huis Acacia te bied, is ook welkom.

"Kom kuier vir ons mense – enigiemand kan kom aankop en sê hulle het kolwyntjies gebreng, kom ons maak koffie – dit is vir hulle so lekker om iemand van buite af te kry," sê sy.

"Baie pasiënte kom hier aan dan vra hulle wat is die besoeke, want hulle het so baie mense wat vir hulle wil kom kuier. Ons sê dan dat ons nie sulke dinge het nie – hierdie is nie 'n koslys en 'n hospitaal nie – jou mense kan

vir jou kom kuier. Dan gaan die tyd verby en niemand kom kuier nie," sê Maggie.

"Ek moes al talle kere hierdie mense se geliefdes vra hoekom hulle nie kom kuier nie, dan is hulle woorde: 'Wat moet ons vir hulle wê?' Daardie persoon het nie verander nie, dis presies dieselfde mens. Wat sou jy vir hulle sê as hulle nie kom kuier vir hulle, kom ondersteun hulle. Al kan jy net een dag hier kom koffie drink en net vry geselskap bring, kom kuier vir hulle."

Maggie vertel van 'n pasiënt wat op sy 75ste verjaardag geen besoekers gekry het nie.

"Hier was 'n oom wat 75 geword het en ek kon sien die oom was dié dag nie lekker nie. Ek het my maat gebel en gesê by moet om-middelklik 'n kosse koop en Acacia toe kom. Hy het toe so gemaak en almal het die oom se verjaardag saam met hom gevier. Hy het ure lank geseel en almal het saam kook geëet en gekuier," onthou sy.

PUBLIC PARTICIPATION NOTICE
ENVIRONMENTAL ASSESSMENT AND MANAGEMENT PLAN FOR A RADIOACTIVE SOURCE MATERIAL STORAGE AND HANDLING FACILITY ON ERF 3554, SWAKOPMUND, ERONGO REGION

Geo Pollution Technologies (Pty) Ltd was appointed by Namaquanum Investments Two CC Ltd to undertake an environmental assessment for construction and operations of a radioactive source material storage and handling facility on erf 3554, Swakopmund, Erongo Region. Additional and location information about the project can be obtained at: <http://www.thenamib.com/projects/projects.html>

The environmental assessment will be conducted according to the Environmental Management Act of 2007 and its regulations as published in 2012.

The Proponent has an existing workshop on erf 3554, Eriksen Street, in the industrial area of Swakopmund. The Proponent plans to refurbish the workshop and to construct a dedicated storage facility for radioactive source material used to calibrate and test drilling equipment (well logging equipment), used in the offshore exploration industry. Clients from the offshore exploration industry will utilize the workshop and source materials to perform calibrations and tests on their drilling equipment. The facility will conform to stringent industry safety and security specifications.

All interested and affected parties are invited to register before 21 February 2024 with the environmental consultant. By registering you are provided with the opportunity to state any comments, issues or concerns related to the project, for consideration in the environmental assessment. Additional information can be requested from:

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Die CAN-ghan by die Hats and Roses-roueentby in 2023. FOTO: VEEBEE

STEF BOS BITTERLIEF
 aangebied deur Windhoek Woordfees

2 Maart
 Namib Primary Aule, Strand Straat, Swakopmund, Namibia

Hekke oop: 18:00 | Vertoning begin: 19:30
 Kaartjieprys: N\$250
 Pensionarisse: N\$200 | Kinders: N\$100
 Beperkte kaartjies beskikbaar

stefbos.my.na of by die Erongo Kantoor – ground floor Plaza Am Meer, Swakopmund

NEWS IN SHORT

Man wanted for assault

Police in the Karango West Region are appealing for public assistance in tracing a suspect who allegedly assaulted a 29-year-old man with a bottle to his right eye, leaving him severely injured, at Nkarenkuru. Chief Inspector Raimbert Muronga confirmed the incident, which took place at Sondorokani shroben. The victims is from Sondorokani village. Anyone with information on the whereabouts of the suspect is urged to contact the nearest police station.

NIKANDOR NANGOLO

FlyNamibia celebrates first all-female crew

FlyNamibia yesterday celebrated its very first flight with an all-female crew. Captain Elsa Martin and co-pilot Li Rossouw flew with Yolanda Gawases as flight attendant. Martin is an experienced pilot and was named captain at FlyNamibia in October last year, becoming the airline's first female captain. "I don't think your gender or skin colour matters. If you have a passion for flying, nothing will stop you. But it would be nice to see more girls in the industry," Martin said in an interview with Namibia Media Holdings last year. Meanwhile, outside her work as a pilot, Rossouw owns a swimwear business, Cheeky, with her friend and fellow pilot Belinda Hoebes. Cheeky's exclusive, sustainable swimwear aims to make women of all shapes and sizes feel comfortable in their own skin. Each piece is made from recycled plastic bottles, salvaged fishing nets and other ocean waste.

"It has always been important to us to be inclusive and to ensure that every woman can feel comfortable and beautiful," Rossouw said in an earlier interview.

STAFF REPORTER



GIRL POWER: FlyNamibia's Li Rossouw, Yolanda Gawases and Elsa Martin. PHOTO: FLYNAMIBIA

WRONG RATES IN GOVERNMENT GAZETTE

Construction industry: Wage adjustments delayed

The process has to start all over again, the labour ministry's executive director said.

ALGETTO GRAIG WINDHOK

While the Construction Industries Federation of Namibia (CIF) and the Metal and Allied Namibian Workers Union (Manwu) reached an agreement on adjustments to the minimum wage for workers in the construction industry last October, it has yet to take effect.

The CIF and the union have blamed the labour ministry for the delay, while the ministry has pointed fingers right back at the two bodies.

According to executive director Lydia Indumbo, the delay is due to an incorrect version of the agreement being submitted electronically by the CIF.

The federation's CEO Birbel Kirchner admitted that an incorrect version was sent to the ministry on 7 October 2023. However, it was sent after the correct, original agreement had already been submitted to the ministry's office on 4 October 2023, she explained.

The ministry submitted



WAITING: Construction workers like Jonathan Gull will have to wait more than a month for adjustments to the minimum wage to take effect. PHOTO: YALJA BAUSE

the wrong document to its justice counterpart, which was subsequently published in the Government Gazette on 19 December 2023, Kirchner said.

"The version of the joint agreement the ministry received from the parties was wrong. This was the exact version that the ministry used throughout the process and was finally published in the Government Gazette," Indumbo said.

After publication in the Government Gazette, 44 days must lapse for the recording of any objections and before the minimum wage comes into force.

Human error According to Kirchner, an inquiry by a building contractor brought the error to

the CIF's attention.

"Fortunately, we picked up the error shortly before the grace period ended. There was indeed an error in the soft copy emailed to the ministry. It was an honest, human error and there was nothing deliberate about it," she stressed.

According to Indumbo, the process now has to start all over again. She said the labour ministry has already submitted the correct agreement to the justice ministry. However, it must be published again in the Government Gazette, while the period of 44 days will also apply again.

Indumbo further denied that the ministry wants to delay the ratification of the new minimum wage. "The ministry wants to

make it clear that it has no reason to delay such an application or any other application," she said. She also distanced herself from allegations made by Manwu against the ministry.

Delay tactic

The union's secretary-general Justina Jonas said the ministry is simply shifting the blame. According to her,

the ministry has been using this delay tactic for years. "Every year, they delay things until we have to fight for them, then they wake up. Publication in the Government Gazette is always delayed - sometimes for six months, sometimes up to a year! This is the same thing they are doing now and now they want to blame us for it. The document is verified and usually they then come back to us but not this time."

Jonas added: "They only respond when you follow up. We contacted the executive director in January and only got a reply a week later. When asked whether the error would cause a delay, it took three weeks before they could answer us." "Why don't they make sure from the beginning? Why don't they do their job from day one? The labour ministry delays the process year in and year out," she fumed.

algetto@republiconline.com.na

PUBLIC PARTICIPATION NOTICE

ENVIRONMENTAL ASSESSMENT AND MANAGEMENT PLAN FOR A RADIOACTIVE SOURCE MATERIAL STORAGE AND HANDLING FACILITY ON OUF 3554, SWAKOPMUND, ERONGO REGION

Geo Pollution Technologies (Pty) Ltd was appointed by Namaquanum Investments Two CC Ltd to undertake an environmental assessment for construction and operations of a radioactive source material storage and handling facility on erf 3554, Swakopmund, Erongo Region. Additional and location information about the project can be obtained at:

http://www.thenamib.com/objects/projects.html

The environmental assessment will be conducted according to the Environmental Management Act of 2007 and its regulations as published in 2012.

The Proponent has an existing workshop on erf 3554, Erstein Street, in the industrial area of Swakopmund. The Proponent plans to refurbish the workshop and to construct a dedicated storage facility for radioactive source material used to calibrate and test drilling equipment (well logging equipment), used in the offshore exploration industry. Clients from the offshore exploration industry will utilise the workshop and source material to perform calibrations and tests on their drilling equipment. The facility will conform to stringent industry safety and security specifications.

All interested and affected parties are invited to register before 21 February 2024 with the environmental consultant. By registering you are provided with the opportunity to share any comments, issues or concerns related to the project, for consideration in the environmental assessment. Additional information can be requested from:

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GOVT CALLS ON CITIZENRY TO SUPPORT RADIO

OGONE TLHAGE WINDHOK

Deputy communications minister Modestus Amutse says radio is an important means of informing the masses and has had a profound impact on society.

He made the remarks in commemoration of World Radio Day yesterday.

"We celebrate the significant role radio continues to play in informing, educating and entertaining

communities globally. As we mark 100 years since its inception, we reflect on radio's evolution, its profound impact on societies and its promising future," Amutse said.

He further called on the citizenry to continue supporting the medium through advertising.

"We urge both the public and private sectors to maintain their support for radio stations through advertising, enabling them to fulfil their

mandate of informing, educating and entertaining while upholding fact-based, high-quality journalism sustainably," he said.

"Let us recognise and honour the enduring legacy of radio by appreciating its influence and looking forward with optimism to the future. Let us continue embracing the power of radio, allowing it to capture our imagination and keep us tuning in."



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>> Lubowski-familie hard getref

‘Antwoorde sterf saam met Geingob’

Anton Lubowski se familie het gehoop president Hage Geingob kon lig werp oor sy laaste ontmoeting met hom die aand van sy sluipmoord.

Digone Thabe

Die weduwe van die vermoorde politikus Anton Lubowski, Gabriëlle, sê die dood van president Hage Geingob het alle hoop laat verdwyn dat sy familie geregtigheid vir sy sluipmoord sal kry.

Lubowski wat 'n prominente regspraktisyn en Swapo-lid was, is die aand van 12 September 1989 vermoor. Die 37-jarige Lubowski is voor sy huis in Windhoek met 'n AK-47 outomatiese geweer doodgeskiet.

Sy familie het gehoop dat hulle Geingob vanjaar kan ontmoet om meer uit te vind oor die besonderse van sy laaste ontmoeting met Lubowski die aand van sy sluipmoord.

"Ons was so seker dat ons hom in 2024 gaan ontmoet en dat hy uiteindelik met ons sou deel wat so belangrik was dat hy en Anton sonder yfwagte in die destydse Kaiserstraat

(nou Onafhanklikheidslyn) moes gaan stap sodat niemand die gesprekke kon afluister nie," sê Gabriëlle.

Gabriëlle Lubowski

WYLE ANTON LUBOWSKI SE VROU

"Die nuus van president Geingob se dood het ons hard getref. Dit was soos 'n hou in die maag, ons was diep ontsteld en tranerig."

Lubowski het Geingob die aand van sy dood vir ete ontmoet. In 'n opebrief aan die ontslape president in 2019 het sy aan hom gevra wat so sensitief was dat hulle nie eers in 'n veilige ruimte kon gaan sit nie.

"Jy was die laaste persoon met wie Anton gepraat het. Hy het inligting met jou gedeel wat so sensitief was dat die twee van julle nie eens kon gaan sit vir 'n koppie koffie nie. 'n Paar



Die ontslape president Hage Geingob saam met die Swapo-politikus Anton Lubowski wat in 'n sluipmoordaanval dood is. FOTO: ARSOF

uur later was Anton dood," skryf sy in die brief.

Volgens Gabriëlle het die nuus van Geingob se dood op 4 Februarie die familie hard getref.

"Die nuus van president Geingob se dood het ons hard getref. Dit was soos 'n hou in die maag, ons was diep ontsteld en tranerig."

Die langverwagte gesprekke met Geingob sou 'n einde bring aan die geheimagtigheid wat Anton se dood

omhul, sê Gabriëlle.

"Ons wou nie met die inhoud van daardie gesprekke weet nie, maar het ook die begeerte gehad vir die aanvaarding en erkenning van al die pyn, trauma, teistering en verwerping wat ons moes verduur het. Net Geingob sou ons vermoedsrus kon gee en ons waardigheid herstel en die nalatenskap met trots dra."

Die familie moet nou egter aanvaar dat hulle ná Geingob se dood nooit

die waarheid sal weet nie.

"Net God kan ons nou troos. Ons moet aanvaar dat 'n ontmoeting van vrede, vergifnis en versoening vir altyd buite bereik is," het sy gesê.

Geingob het oor die jare enige betrokkeheid by Lubowski se moord ontken. In 'n brief aan sy vrou het die ontslape staatshoof by monde van sy prokureur Sisa Namandje haar bewerings as absurd beskryf.

"Jou bewerings is absurd en vreemd. Ten spyte van die feit dat die koelbloedige moord van Anton Lubowski die fokus van 'n polisieondersoek (en waartydens verreis is dat almal insluitend jy, die polisie met inligting help) en 'n openbare hoorhof ondersoek was, maak jy eers byna 30 jaar later roekelose bewerings," het hy gesê.

Die Ierse burger Donald Acheson wat oorweldigende bewyse teen hom as die beweerde sluipmoordenaar gehad het, is ná agt maande in aanhouding in Suid-Afrika vrygelaat. Geen poging is ooit aangewend om Acheson aan Namibië uit te lewer om hier verhoor te word nie. Hy is in 1991 na Ierland gedeputeer.

republiekin@republiekin.com.na

FlyNamibia maak geskiedenis

FlyNamibia het gister sy heel eerste vlug met 'n bemanning wat slegs uit vroue bestaan het, gevier.

Kaptein Elsa Martin en eerste offisier Li Rossouw, waaroor Flypublikum al voorheen berig het, het saam met Yolanda Gawases as kajuitbemanningslid.

Elsa is 'n ervare vlieënier en is in Oktober verlede jaar as kaptein by FlyNamibia aangestel en het hul eerste vrouekaptein geword.

Li besit ook 'n besigheid wat sy saam met haar vriendin Belinda Inebes bedryf. Hul besigheid, Cheeky, verkoop svenklers en het ten doel om vroue van verskillende groottes en liggaamstipes gemaklik in hul vel te laat voel. "Dit was nog altyd vir ons be-



Li Rossouw, Yolanda Gawases en Elsa Martin. FOTO: FACEBOOK/FLYNAMIBIA AIRLIE

langrik om inklusief te wees en te sorg dat elke vrou gemaklik en mooi kan voel. Ná ons die eerste

keer ons produkte bekend gestel het, het iemand vir ons 'n bodskap gestuur wat ontvredde was

omdat die grootste nommer 'n XL was," het Li verlede jaar in 'n onderhoud gesê.

PUBLIC PARTICIPATION NOTICE

ENVIRONMENTAL ASSESSMENT AND MANAGEMENT PLAN FOR A RADIOACTIVE SOURCE MATERIAL STORAGE AND HANDLING FACILITY ON ERF 395A, SWAKOPMUND, ERONGO REGION

Geo Pollution Technologies (Pty) Ltd was appointed by Namaquanum Investments Two CC Ltd to undertake an environmental assessment for construction and operations of a radioactive source material storage and handling facility on erf 395A, Swakopmund, Erongo Region. Additional and location information about the project can be obtained at:

<http://www.flynamibia.com/projects/projects.html>

The environmental assessment will be conducted according to the Environmental Management Act of 2007 and its regulations as published in 2012.

The Proponent has an existing workshop on erf 395A, Einstein Street, in the industrial area of Swakopmund. The Proponent plans to refurbish the workshop and to construct a dedicated storage facility for radioactive source material used to calibrate and test drilling equipment (well logging equipment), used in the offshore oil exploration industry. Clients from the offshore exploration industry will utilize the workshop and source materials to perform calibrations and tests on their drilling equipment. The facility will conform to stringent industry safety and security specifications.

All interested and affected parties are invited to register before 21 February 2024 with the environmental consultant. By registering you are provided with the opportunity to share any comments, issues or concerns related to the project, for consideration in the environmental assessment. Additional information can be requested from:

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Appendix A: Comments and Responses: IAP Review of EIA/ERMP

IAP Details	Comment / Concern	Response
<p>Detlof Von Oertzen Email: 19/06/2024</p>	<p>Thank you for your mail and sharing the EIA/RIA/ERMP doc.</p> <p>There are numerous issues in the document, some of which include the following:</p>	
	<p>The exposure dose levels provided in table 5-2 are not complying with Namibian regulatory requirements, and the units are spelled incorrectly. I cannot believe that these matters were vetted by Dr van Blerk, noting the contents of section 3.2.3? Basic quality assurance should have addressed such discrepancies.</p>	<p>The following is an exact copy of Government Notice No. 221 Radiation Protection and Waste Disposal Regulations: Atomic Energy and Radiation Protection Act, 2005 (Act No. 5 of 2005)</p> <p><i>Occupational dose limits</i></p> <p>1. (1) <i>Subject to subitem (2), the occupational exposure of any worker must be so controlled that the following limits are not exceeded –</i></p> <p>(a) <i>an effective dose of 20 mSv per year averaged over five consecutive years;</i></p> <p>(b) <i>an effective dose of 50 mSv in any single year;</i></p> <p>(c) <i>an equivalent dose to the lens of the eye of 150 mSv in a year; and</i></p> <p>(d) <i>an equivalent dose to the extremities (hands and feet) or the skin of 500 mSv in a year.</i></p> <p>(2) <i>For apprentices of 16 to 18 years of age who are training for employment involving exposure to radiation and for students of age 16 to 18 who are required to use sources in the course of their studies, the occupational exposure must be so controlled that the following limits are not exceeded –</i></p> <p>(a) <i>an effective dose of 6 mSv in a year;</i></p> <p>(b) <i>an equivalent dose to the lens of the eye of 50 mSv in a year; and</i></p> <p>(c) <i>an equivalent dose to the extremities or the skin of 150 mSv in a year.</i></p> <p><i>Special circumstances</i></p> <p>2. <i>When, in special circumstances, a temporary change in the dose limit requirements is approved under regulation 11 –</i></p> <p>(a) <i>the dose averaging period referred to in paragraph (a) of subitem 1(1) may exceptionally be up to 10 consecutive years as specified by the Authority, and the effective dose for any worker may not exceed 20 mSv per year averaged over this period and may not exceed 50 mSv in any single year, and the circumstances must be reviewed</i></p>

IAP Details	Comment / Concern	Response
		<p>when the dose accumulated by any worker since the start of the extended averaging period reaches 100 mSv; or</p> <p>(b) the temporary change in dose limit must be as specified by the Authority, but may not exceed 50 mSv in any year and the period of the temporary change may not exceed 5 years.</p> <p><i>Dose limits for the public</i></p> <p>3. The estimated average doses to the relevant critical groups of members of the public that are attributable to practices may not exceed the following limits –</p> <p>(a) an effective dose of 1 mSv in a year: Provided that in special circumstances, an effective dose of up to 5 mSv in a single year may be approved: Provided further that the average dose over five consecutive years does not exceed 1 mSv: per year;</p> <p>(b) an equivalent dose to the lens of the eye of 15 mSv in a year; and (c) an equivalent dose to the skin of 50 mSv in a year.</p> <p>Error! Reference source not found. is consistent with the above.</p> <p>Dr van Blerk only prepared the RIA.</p> <p>mSV was changed to mSv in the table.</p>
	<p>Section 6.1 does not address whether a facility as envisaged is not better located elsewhere, for example in Lüderitz. This should have been assessed and discussed.</p>	<p>The Proponent has taken various factors in consideration, including the needs of potential future clients. These, together with the fact that the Proponent already owns the erf in question, do not warrant assessment of alternative locations, as the Proponent is not considering alternative locations.</p>
	<p>Chapter 7 should include a summary of the provisions under the Atomic Energy and Radiation Protection Act 5 of 2005, and the Regulations under the Act.</p>	<p>A detailed summary of the Act and its regulations is provided in the RIA.</p>
	<p>Chapter 9 completely misses the point that the facility was advertised as being a “noxious/industry storage site”. It is not what members of the public construed, but is a direct consequence of the adverts places by the project proponent or their “consultants”. In my view,</p>	<p>“Noxious/industry storage site” is the official wording that had to be used by the Town Planners in order to apply for consent from the Municipality. The EIA advertisements clearly indicated “radioactive source material”. Regardless of this, “Noxious/industry storage site” still does not imply that radioactive waste will be stored. The general public however persisted with sharing the notion that it will be a storage site for radioactive</p>

IAP Details	Comment / Concern	Response
	the statements in paragraph 3 in particular are neither helpful nor addressing the subject matter in a factual and balanced way.	waste. Paragraph 3 addresses the misinformation and also confirm that their concerns are understood, even though their concerns may be based on the wrong information. As such, it is helpful in providing the Environmental Commissioner’s office with background to the public consultation process that may ultimately assist them in reaching a decision on the ECC approval/rejection.
	Section 10.5 lacks a description on how radioactive contamination can potentially arise and spread from the proposed premises.	This is discussed in the RIA.
	Section 10.5 would benefit from some serious fact checking and corrections.	Added references to section 10.5.
	Section 11.1 and its subsections are qualitative and do not present objective indicators that can be used to rank the various risks that were identified.	A standard environmental assessment method was used for the impact assessment.
	Many of the statements in section 11.1 are irrelevant (example: “A common example is the radioactive isotopes used to treat cancer patients.”) and not related to the project under consideration, not sure for whose benefit they were included?	The opinion on this is noted.
	Page 103, section 5.5.2, lacks quantification and would benefit (and be more credible) if it were to include actual gamma dose rates during on-site calibration, as well as off-site gamma dose rates during calibration. In the absence of specific exposure scenarios, the qualitative description provided in section 5.5.2 is too simplistic to enable a balanced judgement on the actual on- and off-site risk of exposure associated with on-site calibrations.	<p>The facility is not operational yet and, therefore, is considered prospective in nature. It is recommended in the report that gamma dose rate surveys be conducted before commissioning of the facility to establish baseline conditions at the facilities, at the site and around the site. Once commissioned, this should be repeated under actual operating conditions.</p> <p>The sections on potential exposure to the public were revised and now include several scenarios under normal operating conditions and exposure conditions. It is recommended that these scenarios be revisited once commissioned to ensure that they represent operational conditions. The prospective assessment should be updated with an operational safety assessment and incorporate any site and facility-specific changes.</p>
	Page 104, section 5.5.3, a few exposure scenarios would assist in quantifying the potential risk of exposure – the qualitative argumentation used not not adequately convey the measure of actual and potential	The sections on potential exposure to the public were revised and now include several scenarios under normal operating conditions and exposure conditions. It is recommended that these scenarios be revisited once commissioned to ensure that they represent operational conditions. The prospective assessment should be updated with an operational safety assessment and incorporate any site and facility-specific changes.

IAP Details	Comment / Concern	Response
	risk of exposure of staff as well as members of the public.	
	Section 5.6 has the same deficiencies as identified in the previous bullets in that it lacks a measure for the actual risk of exposure.	The facility is not operational yet and, therefore, is considered prospective in nature. It is recommended that these scenarios be revisited once commissioned to ensure that they represent operational conditions. The prospective assessment should be updated with an operational safety assessment and incorporate any site and facility-specific changes.
	6.3.2.1 mentions Radiation Protection Officers (RPOs). In Namibia, RPOs are NRPA staff. What this section should refer to are the duties of the Radiation Safety Officer (RSO). Had you hired a competent Namibian specialist, such mistakes would not have happened!	This “error” does not change any of the findings of the study and the ultimate responsibility, regardless of what the position is called, remains the same. A local specialist was engaged, but, due to an excessively expensive quote by the specialist, could not be contracted. Nevertheless the comment is noted and it was changed to Radiation Safety Officers (RSO).
	Table 6.1 – the exposure periods assumed are most likely too short in an operational setting. This implies that the associated exposure dose estimate is likely too low.	Section 6.2.2.6 discusses the effect of the shorter or longer exposure period.
	Attention needs to be given to the number significant figures that is used to express the exposure dose estimates in the report, one cannot use an input of one significant figure and express a result using three significant figures – Maths 101.	Noted. The tables were revised to be consistent and the values quoted in the text are presented in a consistent manner.
	A Radiation Management Plan was not included in the document, although this is suggested in your email. The RMP forms the basis of radiation protection measures contained in the EMP.	A radiation management plan and overall operational overview is provided in the final submitted document.
Kristian Woker Email: 19/06/2024	<p>Thank you very much for your mail of 18 June 2024 and the detailed Report. It certainly makes for interesting reading.</p> <p>We have full understanding that such a facility is necessary but not in the middle of a town. We have several residential area’s nearby and Swakopmund is a well-known holiday destination.</p>	<p><i>Initial Response</i></p> <p>Your email and objection is noted and will be included in the EIA. You will also be notified upon final submission of the documentation, with the final document also shared with all registered parties.</p> <p><i>Subsequent Response</i></p> <p>The RIA as presented in Error! Reference source not found. was reworked and expected exposure for nearby residents, neighbours and passers-by was calculated. Refer</p>

IAP Details	Comment / Concern	Response
	<p>This facility will also devalue our property, as no one would like to rent next to such a facility (no matter how good the precautions are). It is just how human nature works.</p> <p>We thus still OBJECT to this facility. It needs to be located in a safer and more remote area like the Industrial properties near the airport of Walvis Bay.</p>	<p>to section 6.3 in the RIA. As can be seen, exposure to nearby neighbours and passers-by is extremely low.</p>

